

Statement of Common Ground between London Borough of Southwark and the City of London Corporation

May 2024



Introduction

- 1.1 This Statement of Common Ground (SCG) has been prepared to demonstrate how the London Borough (LB) of Southwark and the City of London Corporation have facilitated effective joint working on cross-boundary strategic planning matters, in accordance with the requirements of the National Planning Policy Framework (NPPF). It focusses on areas of agreement or disagreement between LB of Southwark and the City Corporation on strategic cross-boundary matters.
- 1.2 The purpose of the SCG is to document the strategic cross-boundary matters being addressed and progress in cooperating to address them. Updates to this document will be agreed at key stages of plan-making. It therefore includes details on mechanisms for review and updating.
- 1.3 This SCG would replace the existing agreement signed in November 2019 between the two parties prepared in support of LB of Southwark's draft Local Plan and the City of London's draft Local Plan (City Plan 2036). This has now been updated to reflect Southwark's Local Plan and the City Corporation's City Plan 2040. These existing arrangements are considered appropriate and proportionate for dealing with any potential strategic and cross-border issues that may arise and will continue to remain in place unless otherwise agreed.

Strategic Geography & Local Policy Context

- 1.4 This section sets out the factual position regarding cross-boundary strategic matters. The location and administrative boundaries of each borough are shown on Figure 1 and Figure 2 below.



Figure 1: Locations of City of London and LB of Southwark within Central London

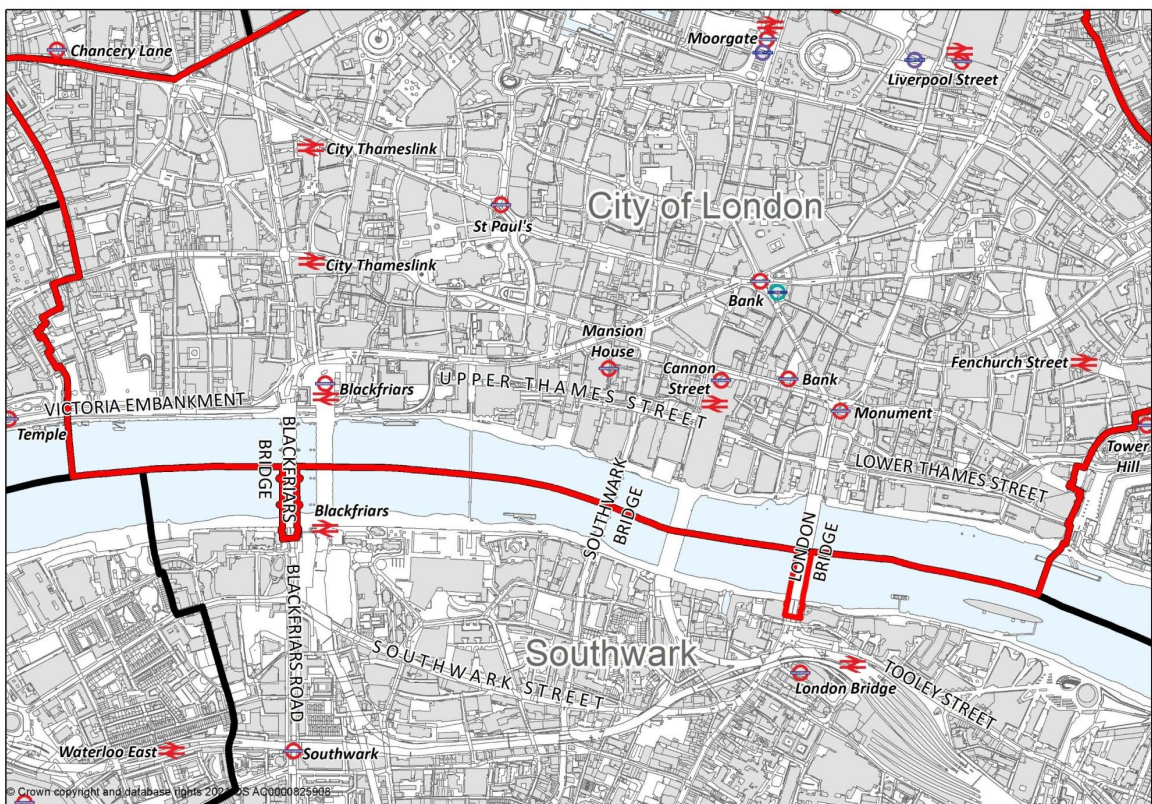


Figure 2: Border between City of London and LB of Southwark

Local Planning Authority:

- 1.5 The City of London Corporation and the LB of Southwark have had a constructive dialogue on cross boundary planning matters for many years, discussing a broad range of planning issues including strategic matters. Several meetings have been held since 2019 which are set out in Appendix 1 (See Table 2) which have informed development of adopted plans and other related documents. Liaison has also been conducted through pan-London groups such as London Councils, the Association of London Borough Planning Officers (ALBPO) and liaising with the Mayor of London.
- 1.6 The City of London borders the LB of Southwark to the north and are separated by the River Thames but connected via six river crossings (London Bridge, Southwark Bridge, Cannon Street Railway Bridge, Millennium Bridge, Blackfriars Railway Bridge and Blackfriars Bridge). This SCG includes the whole of the LB of Southwark and the whole of the City of London's Square Mile.
- 1.7 The City of London lies to the north of the River Thames and covers an area just over one square mile. It is surrounded by seven other London Boroughs - City of Westminster, LB of Camden, LB of Islington, LB of Hackney, LB of Tower Hamlets, LB of Southwark, and LB of Lambeth.
- 1.8 The LB of Southwark is an inner London borough with a northern boundary on the River Thames and situated between the LB of Lambeth, LB of Lewisham and LB of Bromley.
- 1.9 The City of London, also known as the Square Mile, is a world leading financial and professional services centre and a strategically important office cluster at the heart of the Central Activities Zone (CAZ). The City is home to around 21,000 businesses and its resident population of about 8,500 people is significantly smaller than its daytime working population of approximately 615,000. The City is situated on the north bank of the River Thames and is the ancient core of London with a rich legacy of history. It contains St Paul's Cathedral, the Monument, the Bank of England and many other well-known landmarks; it adjoins the Tower of London and houses arts and cultural facilities of international renown, including the Barbican Centre. The City is estimated to have attracted 21.5 million leisure and business visits in 2018.
- 1.10 Southwark is a densely populated and diverse inner London borough set over almost 30km of land to the south of the River Thames. Home to over 314,000 people, the borough is a patchwork of communities set over diverse 23 wards. Whilst the northern part of the borough already enjoys excellent transport links to the rest of London, the south is due to benefit from the extension of the Bakerloo Line, which will open up areas including the Old Kent Road to new growth.

The Southwark Plan was adopted in February 2022 and sets out the council's ambitious plans for the borough. We have pledged to deliver 2,255 new homes every year, of which 50% will be affordable, and to provide 11,000 new council homes by 2043. We are working hard to develop business, with an aim of creating 58,000 new jobs over the plan period and with 52 hectares of land designated as Strategic Protected Industrial Land or Locally Significant Industrial Sites.

1.11 Southwark benefits from four Opportunity Areas (OA) which have significant capacity for development, growth, and potentially improved public transport access and which are essential in delivering Southwark's housing strategy. The four OAs are:

- Canada Water
- Elephant and Castle
- London Bridge, Borough and Bankside
- Old Kent Road

London Plan:

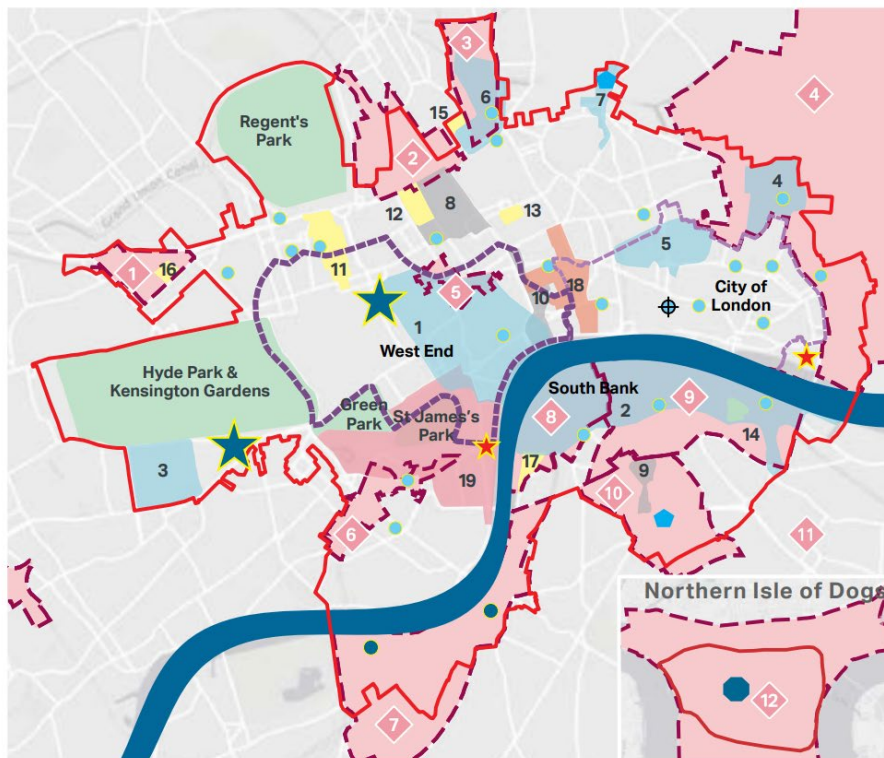
1.12 The London Plan is the spatial development strategy for London, produced by the Greater London Authority (GLA) on behalf of the Mayor of London. Every London borough Local Plan must be in general conformity with the London Plan. Together, the policies in the London Plan and in each borough's Local Plan constitute the statutory local development plan for that borough, along with any neighbourhood development plans once made. It is worth noting that in a London context, collaboration on many strategic issues that go beyond borough boundaries (e.g. distribution of housing targets, identification of major areas of growth etc.) are addressed through the London Plan and the current version of this was published March 2021.

Key Strategic Matters

1.13 The key strategic issues are set out below in regard to ongoing plan making, although it is noted that there are other issues that may have cross boundary impacts. Both the City of London and LB of Southwark are committed to further dialogue moving forward, and not just those limited to periods of plan preparation.

Employment, retail, leisure and commercial development:

1.14 There are no shared town centres but both the City of London and LB of Southwark are within the Central Activities Zone (See Figure 3).



The Central Activities Zone and the Northern Isle of Dogs



Figure 3: The CAZ and the Northern Isle of Dogs (Source - Figure 2.16 – CAZ Diagram in the London Plan)

1.15 In regard to employment the whole of the City of London and areas of LB of Southwark in the northern part of the borough lies within the Central Activities Zone (CAZ). The CAZ is a London Plan designation set out in Policy SD4 (The Central Activities Zone - CAZ). It contains a broad range of functions that have London-wide, national and international significance including Government, business, culture, research and education, retailing, tourism, transport and places of worship. The London Plan seeks to promote and enhance the agglomeration and rich mix of strategic functions and local uses in the CAZ, whilst also supporting and enhancing its significant office functions.

1.16 The City of London Corporation plays a key role in the Central Activities Zone, containing nationally and internationally significant office functions. Policy E1 of the London Plan identifies the unique agglomerations and dynamic clusters of world city businesses and other specialist functions of the central London office market, including the Central Activities Zone. The London Plan supports local authorities in protecting strategic office locations, such as the CAZ, including through the use of Article 4 directions. The City of London Corporation has Article 4 directions to ensure that areas are not undermined by

office to residential permitted development rights. The City Plan seeks to provide a minimum of 1.2 million sqm of additional office floorspace up to 2040, to accommodate an increase of 66,000 jobs.

Neighbourhood Planning:

- 1.17 There are two designated neighbourhood planning areas spanning the borough boundary between the two parties- Southbank & Waterloo Neighbourhood Plan and the Bankside Neighbourhood Forum.

Housing:

- 1.18 London is considered as a single housing market area, with a series of complex and interlinked sub-markets. The Mayor has carried out a London-wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA). The SHMA has identified need for 66,000 additional homes per year. The NPPF sets out a standardised approach to assessing housing need and requires strategic planning authorities to follow this approach in setting housing targets in Local Plans. The City of London Local Plan is required to be in general conformity with the London Plan, which sets a housing target for the City and the London boroughs. The City Corporations target is 146 additional residential units per annum up to 2028/29. The target for the plan period is 1,706 units.
- 1.19 The adopted Southwark Plan aims to deliver at least 2,355 new homes every year up to 2036, totalling 40,035 new homes within the plan period. It seeks to deliver 50% of all new homes as social rented and intermediate homes, with a minimum requirement of 35% (25% social rented and 10% intermediate).
- 1.20 Both parties **agree** that they will aim to meet or exceed the total numerical housing target assigned to them by the Mayor of London in the London Plan, within the confines of their own administrative boundary.
- 1.21 In terms of affordable housing, to ensure a consistent approach across London, both parties **support** the Mayor's threshold approach to affordable housing and the Mayor's strategic target of 50% affordable housing across London.
- 1.22 The City of London manages several housing estates within the LB of Southwark totalling 1,063 homes.
- 1.23 Both parties **agree** to work collaboratively on any additional development or redevelopment of these properties and estates to deliver new affordable housing for City and LB of Southwark residents.

Gypsies and Travellers:

- 1.24 The London Plan states that in the absence of an up-to-date local Gypsy and Traveller needs assessment boroughs should use the need figure set out in Table 4.4 of the London Plan.
- 1.25 The City of London has a need for zero pitches and is not planning to make provision.

- 1.26 LB of Southwark has an identified need of zero pitches for Gypsies and Travellers who meet the Planning Policy for Traveller Sites (2015) definition and a need for 43 pitches for those who do not meet the definition. There is no identified need for plots for travelling showpeople in the borough. LB of Southwark will meet the needs of Southwark's Gypsy and Traveller community over this period by safeguarding the existing Gypsy and Traveller sites in Brideale Close, Burnhill Close, Ilderton Road and Springtide Close and managing churn in vacant pitches on this site to meet identified future need.
- 1.27 Both parties **agree** that on this basis neither borough has unmet need for gypsy and travellers accommodation

The provision of energy (including heat):

- 1.28 The London heat map is an online tool, developed by the Mayor, used to find opportunities for decentralised energy (DE) projects in London. The Mayor has identified Heat Network Priority Areas, which can be found on the London Heat Map website. These identify where in London the heat density is sufficient for heat networks to provide a competitive solution for supplying heat to buildings and consumers. No existing or proposed heat networks cross the borough boundary between the two parties.
- 1.29 Sub-regional Local Area Energy Plans (LAEPs) are being developed across London to facilitate cross-boundary local energy planning and action, led by the Mayor of London. The City is part of the Central, Inner East and North (CIEN) sub-region and these sub-regional priorities are likely to include heating and cooling networks and electricity grid capacity / resilience. Heat zoning regulations being developed by the UK Government are intended to provide the basis for the commercialisation and expansion of heat networks in central London. The City Corporation is participating in the UK Government's Advanced Zoning Programme (AZP) and is contributing to the way the regulations could be applied in the City.

Waste management:

- 1.30 Each Waste Planning Authority is expected to plan for their identified waste needs, including planning to meet London Plan apportionment targets.
- 1.31 The City of London works collaboratively with the South East London Joint Waste Planning Group (SELJWPG) to meet its London Plan Waste Apportionment in full. This group consists of LB of Bexley, LB of Bromley, LB of Greenwich, LB of Lewisham and LB of Southwark. The City of London Local Plan promotes a Circular Economy approach to waste.
- 1.32 There are no significant commercial waste movements between LB of Southwark and the City of London. However, the City's household recyclable materials are sent to a Materials Recovery Facility (MRF) operated by Veolia in the LB of Southwark.
- 1.33 Both parties acknowledge that there are no implications for either party as a result of each other's proposed position on waste.

Tall Buildings:

- 1.34 The London Plan Policy D9 (Tall Buildings) requires Development Plans to define what is considered to be a tall building and determine if there are locations where tall buildings may be an appropriate form of development, identifying locations and appropriate tall

building heights. The draft City Plan 2040 sets out a comprehensive approach to managing tall building proposals in the Square Mile.

- 1.35 Tall buildings in the City are defined as those exceeding 75m AOD in height. The draft City Plan Policy S12 identifies locations (City Cluster and Fleet Valley) and heights for tall buildings areas in the City where tall building development will be considered appropriate. This policy has been informed by detailed heritage impact assessments and strategic visual impact assessment, considering how the proposed massing of tall buildings in these areas could potentially impact the strategic landmarks and the wider City and pan-London skyline.
- 1.36 Tall buildings in LB Southwark are defined as above 30m except in the Thames Special Policy Area where it is defined as above 25m. The areas where tall buildings are acceptable are identified in the adopted Policies Map. These are typically within our Major Town Centres, Opportunity Area Cores, Action Area Cores and the Central Activities Zone.

Strategic and Local Views:

- 1.37 The London Plan currently protects strategic views of a number of significant heritage assets in central London through the London Views Management Framework (LVMF). However, it is important both the LB of Southwark and City of London collaboratively with one another and the GLA and other London Boroughs on these views.
- 1.38 The Strategic views which cross the borough boundary between the two parties:
- Protected Vista Blackheath Point to St Paul's Cathedral
 - Protected Vista Greenwich Park to St Paul's Cathedral
- 1.39 The Background Wider Setting Consultation Area for views of St Paul's Cathedral which cross the borough boundary between the two parties:
- London Panorama Alexandra Palace to St Paul's Cathedral
 - London Panorama Kenwood to St Paul's Cathedral
 - London Panorama Parliament Hill to St Paul's Cathedral
 - London Panorama Primrose Hill to St Paul's Cathedral
- 1.40 Local views from LB of Southwark into the City of London
- London Panorama of St Paul's Cathedral from One Tree Hill
 - London Panorama of St Paul's Cathedral from Nunhead Cemetery
 - Linear view of St Paul's Cathedral along Camberwell Road
 - River prospect of River Thames and its frontage, Tower Bridge and St Paul's Cathedral from Kings Stairs Gardens
 - The townscape view south from the centre of the Millennium Bridge
- 1.41 St Paul's Heights Code viewpoints along South Bank of the Thames and southern ends of Blackfriars Bridge, Southwark Bridge, Cannon Street Railway Bridge and London Bridge.

- 1.42 There are no local views from the City of London into LB of Southwark but Local views from LB of Southwark into the City are listed above.
- 1.43 Within LB of Southwark protected views and areas appropriate for tall buildings have been identified.
- 1.44 Within the City of London draft Local Plan, areas appropriate for tall buildings have been identified. The City Plan includes a St Paul's Heights code, which has been in place since the 1930s.
- 1.45 Both parties **agree** to have regard to cross border strategic and local views when determining applications and consult each other on any proposals that could impact on these views. LB of Southwark agrees to protect views of St Paul's Cathedral, complementing the St Paul's Heights code, from identified viewpoints.

Heritage, design and conservation:

- 1.46 The conservation areas which cross the borough boundary between the two parties are set out below and we agree to work collaboratively on this:
- Whitefriars Conservation Area

Cultural Infrastructure:

- 1.47 The Southbank/Bankside/London Bridge area is designated in the London Plan as a strategic cluster of cultural attractions. This area set out in Figure 3 (The CAZ) crosses the borough boundary between the LB of Lambeth and LB of Southwark and lies adjacent to the boundary with the City of London. As set out in the London Plan boroughs should identify these are other strategic clusters of cultural attractions in their Local Plans. The City of London have published a Cultural Planning Framework (CPF) which sets out cultural provision in the City.
- 1.48 Destination City, the City Corporation's flagship strategy, recognises the crucial role that culture and visitors will play in creating a more vibrant Square Mile that is a welcoming destination for everyone. The draft City Plan Policy S6 (Culture and Visitors) seeks the development of a wide range of cultural, leisure and recreational facilities across the City. It provides links to the CPF, which is currently under development, and which will set out a framework for how new development can support the cultural life of different parts of the Square Mile, informed by extensive research.
- 1.49 Both parties acknowledge that this area could result in cross border movements of people between LB of Southwark and the City of London but **agree** there are no known planning reasons why these movements cannot continue.

River Thames

Policy Approach:

- 1.50 The Thames Policy Area is a special policy area set out in the London Plan and to be defined by boroughs in which detailed appraisals of the riverside will be required. Collaboration with riparian neighbouring boroughs, the Environment Agency, the Marine Management

Organisation, the Port of London Authority and the Mayor of London is essential to ensure that the strategies and plans for the river are realised.

- 1.51 The River Thames provides a major asset that LB of Southwark and the City of London border. Both authorities recognise the importance of this setting and have complementary policy approaches to shape future development within the area designated through the London Plan as the Thames Policy Area.
- 1.52 The City of London Riverside Strategy (2021) provides guidance for the management of the river flood defences in the Square Mile, including the approach to raising the flood defences over the coming century whilst also providing benefits to the workers, residents and visitors that use the Thames river frontage.
- 1.53 The Thames Vision produced by the Port of London Authority, sets a framework for greater use of the River Thames between now and 2050 including targets for increased passenger and freight movements.

River Services:

- 1.54 Both parties **agree** to work collaboratively to improve both passenger transport on the River and use of the River for freight movements and implement policies affecting the London Plan Thames Policy Area.

Site of Importance for Nature Conservation:

- 1.55 Both parties are separated by the River Thames and therefore no green infrastructure crosses the borough boundary between the two parties. However, the River Thames and Tidal Tributaries Metropolitan SINIC crosses the border.
- 1.56 Both parties **agree** to consult each other on any proposals that could impact on the River Thames and Tidal Tributaries Metropolitan SINIC.

Sustainability:

- 1.57 LB of Southwark has declared a Climate Emergency and is aiming to do everything it can to meet carbon neutrality by 2030. This is set out in Southwark's Climate Strategy.
- 1.58 The City of London Climate Action Strategy provides evidence for the trajectory to a net zero carbon City by 2040. The City of London will ensure it is environmentally sustainable and transitions to a net zero carbon, taking a 'retrofit first' approach to development.
- 1.59 Many of the sections set out in this SCG relating to transport, waste, flood risk, provision of energy and air quality are all relevant to mitigating and adapting to climate change.
- 1.60 Both authorities agree to follow the approach outlined in the London Plan for zero carbon developments (Policy SI2) and support the principle of the Mayor's urban greening and Biodiversity Net Gain (BNG) objectives.

Retrofit First:

- 1.61 The City of London Corporation acknowledges the need to prioritise the retrofit and refurbishment of existing buildings to meet the changing needs of occupiers and reduce the impact of development on climate change. The policy approach is for retrofit first, not

retrofit only. The City Corporation has developed supplementary planning guidance, including Carbon Options Guidance and a draft Sustainability SPD. The supplementary guidance outlines the methodology for undertaking a whole life-cycle carbon assessment.

Flood Risk:

- 1.62 The Thames Barrier is managed and maintained by the Environment Agency and protects 125 square kilometres of central London from flooding caused by tidal surges. This includes the protection of properties in LB of Southwark and in the City who would otherwise be at risk of tidal and fluvial flooding. The Thames tidal defences also includes tidal walls and embankments along the banks of the River Thames. Should they fail or become breached the areas most at risk of flooding would be in the north of Southwark and an area of the City within 200m of the Thames, but this could also impact on the surrounding neighbourhoods. The Environment Agency holds tidal breach modelling. This is also detailed within Southwark's Strategic Flood Risk Assessment (SFRA) Tidal Breach addendum and the City of London's SFRA.
- 1.63 The Environment Agency's Thames Estuary 2100 Plan sets out the measures that require implementing to maintain adequate flood risk protection from the River Thames by the year 2100. The Plan identifies LB of Southwark and the City of London within Action Zone 2 – Central London. The Plan outlines a number of recommendations to mitigate flood risk within this zone, including to maintain, enhance or replace, the river defence walls and active structures through central London. The Plan was updated in May 2023 which brought forward the first raising in the City of London from 2065 to 2050, which can be up to 0.5m and a further 0.5m by 2090.
- 1.64 Flood risk in each borough is addressed through respective Strategic Flood Risk Assessment (SFRAs) and Local Plans planning policies. SFRAs assess the risk from all sources of flooding, this includes fluvial, tidal, surface water and foul water sources.
- 1.65 Each local authority is statutorily required to produce a Local Flood Risk Management Strategy (LFRMS) for their respective borough which details how they assess and will manage Local Flood Risk within their administrative boundary. LFRMSs require cross boundary partnership working to achieve the ultimate outcome of reducing Local Flood Risk. The City of London have quarterly Flood Group meetings with London boroughs in the North Central section, but LB of Southwark do not form part of this group but meet with colleagues in the LB of Lambeth. As part of the partnership working, Southwark's and the City's Flood Risk Officers meet at quarterly Flood Group meetings. The City of London attend the London North Central Thames Catchment Flood Risk Partnership and the LB of Southwark attend the Central South Flood Risk Partnership.
- 1.66 Both parties **agree** to have regard to each other's flood risk policies and evidence.

Governance Arrangements

- 1.67 This statement has been informed by on-going engagement between the two parties – as evidenced by the main body of the statement explaining joint working and engagement between the parties in Appendix 1.

1.68 This SCG is a live document and will be reviewed and updated when either party reaches a critical stage in plan-preparation and will form a key part of implementation of Local Plan policies and reviews. The SCG will be informed by continued communication between the parties through meetings, statutory consultation at key plan making stages and electronic communication.

1.69 Key stages of each borough’s plan making process (set out in Table 1) will be triggers for the SCG to be reviewed, however strategic matters will be dealt with on an on-going basis in-between formal reviews of the SCG.

Timetable for agreement, review and update

1.70 LB of Southwark adopted its Local Plan in February 2022 and the key dates for the review of this document are set out in Table 1 below.

1.71 The City of London’s current Local Plan was adopted in 2015. Preparation of a new local plan, called City Plan 2040 is currently in progress. It is anticipated that this will be submitted for examination in Summer 2024. Once adopted, the new Plan will replace the Local Plan 2015. The key dates for this review are set out below.

Local authority	Present plan adoption	Date of Review	Reg. 18 date	Anticipated Reg. 19 date (Revised Reg19 date for City)	Anticipated submission date
LB of Southwark Local Plan	February 2022	TBC	TBC	TBC	TBC
City of London Local Plan	January 2015	2016	November 2018	Spring 2024	Summer 2024

Table 1: Plan review, update and submission dates produced by City of London and LB of Southwark

1.72 Ongoing collaboration between the parties will continue through regular meetings and through attendance at group meetings where cross boundary issues are discussed.

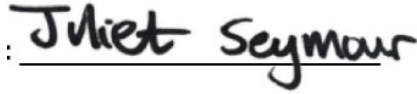
Signatories

1.73 Both parties agree that this statement is an accurate representation of matters discussed and schedule of issues agreed upon set out in Appendix 1.

1.74 It is agreed that these discussions will inform both the draft Southwark Local Plan and the draft City Plan 2040 and both parties will continue to work collaboratively in order to meet the duty to cooperate.

1.75 For the City of London the Statement of Common Ground is signed by the Head of Policy & Strategy with political oversight from the Chair and Deputy of the Planning & Transportation Committee.

Signed:



Name: Juliet Seymour

Position: Head of Policy, Building Control and the Historic Environment

London Borough of Southwark

Signed:



Name: Rob McNicol

Position: Head of Policy & Strategy

City of London

Appendix 1 - Schedule of engagement between the parties

1.76 Officer-level meetings to discuss strategic cross border planning matters under the duty to co-operate and to develop this Statement of Common Ground took place to discuss emerging Local Plans and wide range of strategic matters:

Dates	Purpose of Meeting	Key Actions
Friday 15 September 2017	Duty to Co-operate	Discussed issues relevant to both boroughs and discussed Local Plan updates.
September 2019	Duty to Co-operate	Discussed issues relevant to both boroughs and discussed Local Plan updates.
Wednesday 22 March 2023	Duty to Co-operate	Discussed issues relevant to both boroughs and discussed Local Plan updates as set out in Table 1.
Thursday 16 November 2023	Duty to Co-operate	Discussed issues relevant to both boroughs and discussed Local Plan updates as set out in Table 1.

Table 2: Schedule of engagement between City of London and LB of Southwark