

Statement of Common Ground between the City of London Corporation and the London Borough of Tower Hamlets

March 2024



Introduction

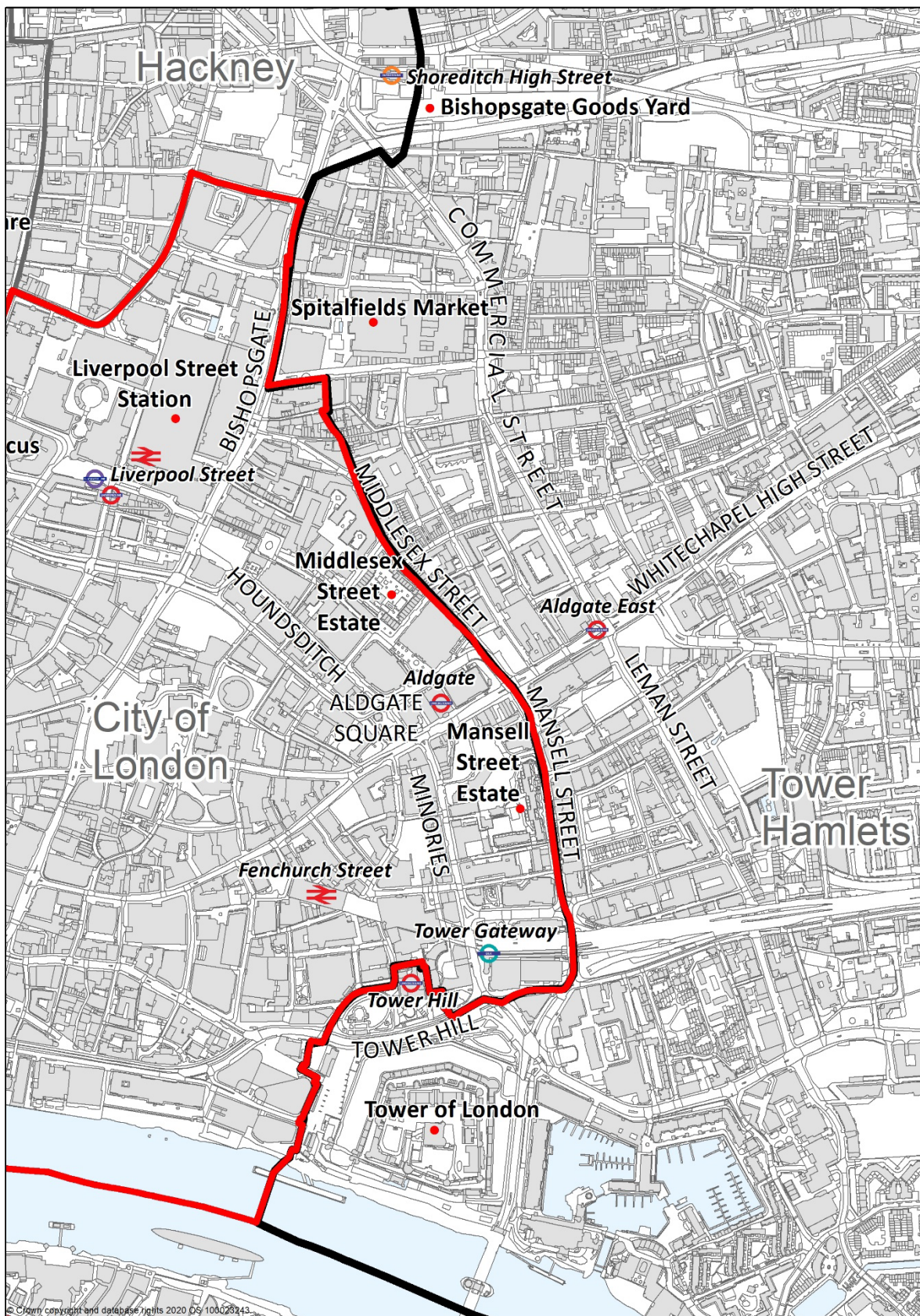
1. This document is the Statement of Common Ground (SoCG) between the London Borough of Tower Hamlets and the City of London Corporation. This SoCG applies to the review of the City of London Local Plan (known as City Plan 2040) and to the implementation of the London Borough of Tower Hamlets Local Plan 2031: Managing Growth and Sharing Benefits. Tower Hamlets consulted on a first draft version of a new Local Plan for Tower Hamlets in accordance with Regulation 18 legislation between November and December 2023.
2. It sets out details of the cooperation between Tower Hamlets and the City of London during plan preparation and will inform further engagement to ensure effective coordination and implementation of Local Plan policies.
3. The Tower Hamlets Local Plan 2031: Managing Growth and Sharing Benefits was adopted on the 15th January 2020. The Plan is currently being reviewed, with Regulation 18 consultation recently concluded and Regulation 19 Consultation planned for summer 2024.
4. The City of London Local Plan was adopted in January 2015. The City Corporation consulted on a full Draft Local Plan between November 2018 and February 2019. In spring 2021, a proposed submission version of City Plan 2036 was consulted on. Further evidence and revisions to the City Plan in 2022 and 2023 were undertaken to address consultation responses and changing economic, social and environmental circumstances. The key concern for further evidence was the Mayor of London considered the draft City Plan 2036 to be in non-conformity with the London Plan 2021. It was thought that a policy approach that maps out areas inappropriate for tall buildings leaves uncertainty regarding the status of other parts of the City. The City Corporation will conduct Regulation 19 publication of the Local Plan and Regulation 20 consultation in spring 2024, followed by submission to the Secretary of State in summer 2024.

Geography covered by the Statement of Common Ground

5. The SoCG covers the Local Planning Authority areas of the City of London and the London Borough of Tower Hamlets. The boundaries of these are shown on Map 1.



Map 1: Location of the City of London and London Borough of Tower Hamlets



Map 2: Boundary between London Borough of Tower Hamlets and the City of London

London Borough of Tower Hamlets

6. Tower Hamlets is a diverse and rapidly growing inner London Borough, with an estimated population of around 310,300 in 2021. Tower Hamlets shares boundaries with the City of London to the west and the boroughs of Newham and Hackney to the north. The River Thames flows along its southern boundary, separating Tower Hamlets from the boroughs of Greenwich, Lewisham and Southwark. Tower Hamlets is made up of distinct places, from the major international business centres of Canary Wharf and parts of the City Fringe, through to residential areas with traditional East End character, such as Bow and Stepney, and vibrant inner-city communities, such as Whitechapel and Shoreditch. It also contains the Tower of London along with many other historical landmarks.

City of London

7. 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 8,600 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 23.3 million international and domestic tourists in 2019.

Key strategic matters

8. The City of London Corporation and the London Borough of Tower Hamlets have had a constructive dialogue on cross boundary planning matters for many years, discussing a broad range of planning issues, including strategic matters. Specific meetings are listed in Appendix 1. Liaison has also been conducted through pan-London groups such as London Councils and the Association of London Borough Planning Officers (ALBPO).
9. The following issues are the key strategic matters with regard to ongoing plan making, although it is noted that there are other issues that may have cross boundary impacts. Tower Hamlets and the City of London Corporation are committed to further dialogue moving forward, and not just those limited to periods of plan preparation.
10. Many of the strategic matters and key issues to be addressed through compliance with the duty to cooperate are, in London, a matter for the London Plan or are otherwise addressed through the preparation of the London Plan. The London Plan is part of the development plan for planning authorities in London and Local Plans prepared by the City of London and the London boroughs are required to be in general conformity with it.
11. Officers from both authorities have an ongoing and close relationship with Greater London Authority (GLA) officers, attend regular meetings to discuss strategic matters affecting our areas and London and have participated in the development and review of the London Plan.

Housing

12. 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 Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA). The SHMA has identified need for 66,000 additional homes per year. The NPFF 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.
13. Tower Hamlets' adopted Local Plan sets an overall housing requirement of 58,965 new homes over the 15-year Plan period between 2016 and 2031, which equates to an average of 3,931 per annum. The London Plan sets a housing target of 37,470 for the period 2019-2029 for Tower Hamlets. The authorities consider that their London Plan targets can be met within their respective boundaries and represents a reasonable assessment of housing capacity which they are planning to meet through their adopted and emerging Local Plans.

Affordable housing

15. The City Corporation owns and manages the 80 flats within the Dron House estate in Tower Hamlets. The City Corporation has a programme of infill and redevelopment schemes in many estates across its portfolio to deliver increased affordable housing capacity. The City Corporation and Tower Hamlets will continue to work together to identify suitable sites to deliver affordable housing in Tower Hamlets, using s106 contributions from residential and commercial developments in the City of London area. Issues such as nomination rights will also be a key part of future discussions.

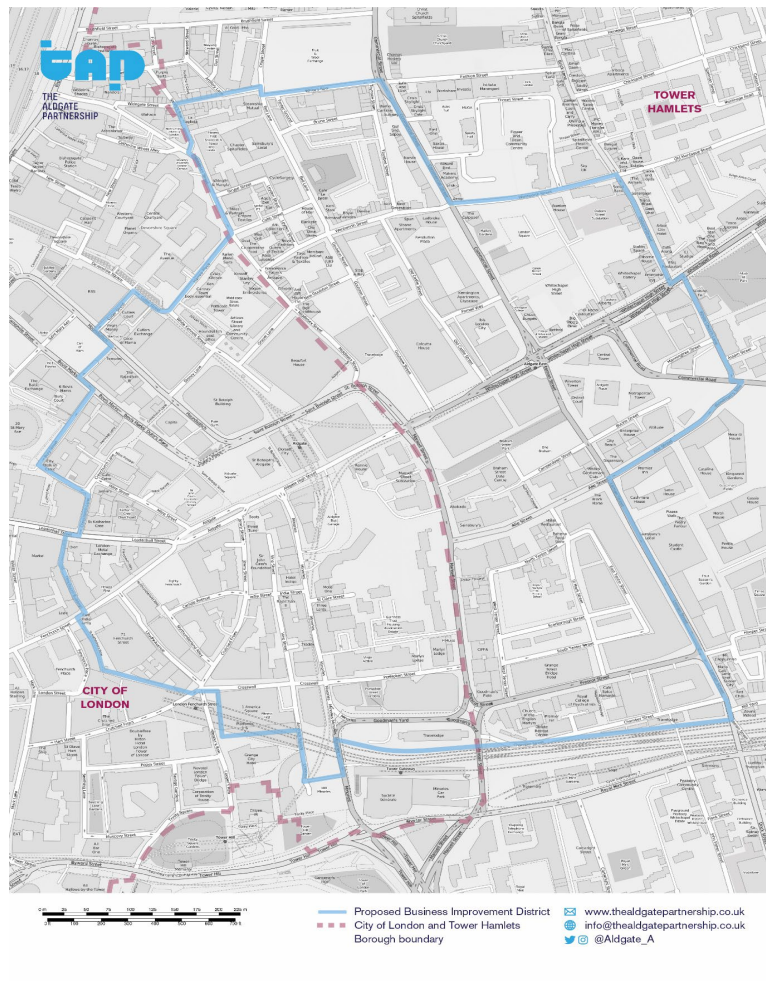
Employment space

16. The City of London and the western portion of Tower Hamlets lie within the Central Activities Zone (CAZ), where the London Plan promotes further economic and employment growth. Although not formally within the CAZ, the northern part of the Isle of Dogs fulfils some of the same functions, and the same general policy approach is taken there for offices as in the CAZ. The continued success of the CAZ is vital to London's world city status. Both authorities have introduced Article 4 Directions to protect their strategically important office supply against conversion to residential use under permitted development rights. These Article 4 Directions apply to the whole of the City of London and to areas of Tower Hamlets that lie within the CAZ and the City Fringe/Tech City Opportunity Area, together with part of the Isle of Dogs and other key local employment locations elsewhere in the borough.
17. The emerging City Plan 2040 seeks to provide a minimum of 1.2 million sqm of additional office floorspace in the City of London to 2040, in line with the City's identification as a nationally important location for globally oriented financial and professional services in the London Plan. Tower Hamlets' Local Plan 2031 aims to maximise the provision of employment floorspace in designated employment

locations to contribute towards the borough's target of creating 125,000 new jobs over the period to 2031.

City Fringe / Aldgate

18. The City Fringe is an important area of economic and employment growth in Tower Hamlets and the Local Plan 2031 vision for the area aims to maximise opportunities arising from the expansion of the City of London's commercial activities eastwards and the Tech City and Med City initiatives, with support for new affordable and flexible employment spaces benefiting from the arrival of the Elizabeth Line.
19. The emerging City Plan 2040 identifies Key Areas of Change, where the scale of change expected over the Plan period presents opportunities or challenges that warrant a specific policy focus. One of the Key Areas of Change is the Liverpool Street area, which will also benefit from the opening of the Elizabeth Line. The City Plan 2040 supports the role of this area as a gateway to the City Fringe/Tech City by encouraging the development of flexible, affordable and collaborative office space suitable for tech start-ups and growing businesses. The policy approach in the two Local Plans is considered to be complementary.
20. The vision for the City Fringe in Tower Hamlets' Local Plan 2031 supports a more diverse mix of commercial, cultural, leisure, tourism and night-time activities in the area's town centres, including Shoreditch, Spitalfields and Aldgate, capitalising on the visitor economy arising from the Tower of London. The Local Plan 2031 seeks to improve the public realm, including signage and wayfinding in and around the Tower of London, to encourage visitors to explore the rest of Tower Hamlets.
21. This approach aligns with the emerging City Plan 2040, which identifies the Aldgate, Tower and Portsoken Key Area of Change along the City of London's eastern boundary as a vibrant mixed-use area where the competing needs of residents, workers and visitors need to be balanced. It similarly seeks to improve linkages with the Tower of London and to enhance the townscape and public realm within the Tower Gateway area, noting that there is currently little to entice visitors going to the Tower to explore this part of the City more widely.
22. The City of London Corporation and the London Borough of Tower Hamlets have worked jointly since 2014 to promote the regeneration of Aldgate through their involvement in the Aldgate Partnership, which represents businesses and other stakeholders in the area. With support from both authorities, the Aldgate Partnership developed proposals for a cross-boundary Business Improvement District (BID), which were approved in a ballot of local businesses in February 2020. The BID, known as Aldgate Connect, went live on 1st April 2020. The BID will raise money to be spent on projects aimed at delivering its strategic priorities of an appealing area; a protected area; a stronger area; and a welcoming area. The BID covers equidistant areas on either side of the administrative boundaries of the City of London Corporation and the London Borough of Tower Hamlets.



Map 3: Area covered by Aldgate Connect BID

Tall buildings and protected views

23. The Mayor's LVMF Townscape View from The Queen's Walk to the Tower of London World Heritage Site incorporates areas of Tower Hamlets and the City of London within the background Wider Setting Consultation Area and the protected silhouettes of the White Tower. In addition, two of the Mayor's LVMF London Panoramas (from Primrose Hill and from Greenwich Park) affect small parts of Tower Hamlets as well as the City of London, while two of the LVMF linear views of St Paul's Cathedral (from King Henry VIII's Mound, Richmond and from Westminster Pier) extend into Tower Hamlets as background Wider Setting Consultation Areas. These strategic views are shown on the Policies Maps produced by both authorities. The protection of views of the Tower of London and St Paul's affects the control of building heights in certain parts of the City of London and the London Borough of Tower Hamlets, and the two authorities will continue to cooperate to ensure these strategic views are protected and enhanced.
24. Tall buildings are an iconic feature of the skyline in parts of the City of London and Tower Hamlets, but by their nature they can have significant impacts. The two authorities will work together to ensure that tall buildings are located in suitable areas where adverse impacts on local townscape character and the wider skyline can be prevented.

25. The Tower Hamlets Local Plan 2031 indicates that tall buildings should be of a height, scale, mass and volume proportionate to their role, function and importance of the location in the local, borough-wide and London context; and take account of the character of the immediate context and of their surroundings. Tall buildings are guided towards designated Tall Building Zones, based on the findings of a 2017 study. The Regulation 18 draft of the emerging Tower Hamlets Local Plan proposes a more flexible approach to tall buildings, with more areas of the borough being identified as potentially suitable for tall buildings, though tall buildings would still be expected to relate sensitively to their context.
26. The City Corporation has developed a tall buildings evidence base which includes two tall building clusters: City Cluster and Fleet Valley. The City Corporation acknowledges that tall buildings should be located in suitable areas where adverse impacts can be prevented, The City Corporation undertook a Strategic Views Impact Assessment to understand the impacts from the Mayor's Landmark View Management Framework (LVMF) and Tower Hamlets locally identified views.
27. The majority of the City of London's tall buildings pipeline is focused in and around the existing cluster in the east of the City, while Aldgate is identified as one of the Tall Building Zones in Tower Hamlets. The Regulation 18 draft of the emerging Tower Hamlets Local Plan also identifies a number of areas along the boundary between the City and Tower Hamlets as part of a potential new Tall Building Zone. Therefore, tall buildings is a cross-boundary issue between the two authorities.

Tower of London World Heritage Site

28. While the Tower of London is within Tower Hamlets, part of its defined Local Setting Area is also within the City of London and each authority shows this area on their respective Policies Maps. Both the Tower Hamlets Local Plan 2031 and the emerging City Plan 2040 contain policies relating to the Tower of London World Heritage Site, which seek to safeguard its Outstanding Universal Value. The two plans are aligned in seeking opportunities to enhance the area immediately around the Tower, much of which experiences heavy traffic flows and offers a relatively poor-quality public realm.

Governance arrangements

29. This Statement of Common Ground has been informed by ongoing engagement between Tower Hamlets and the Corporation of London. It has been prepared as a living document, which will be reviewed and updated as necessary and will form a key part of implementation of Local Plan policies and any future Local Plan reviews (for both authorities).
30. Specific officer-level meetings to discuss cross-boundary issues will continue to be held on a regular basis, (proposed bi-annually, particularly where there are significant cross-boundary issues to discuss). Regular Member-led partnership meetings will continue to take place between the two authorities. Depending on the status of issues discussed and other factors including ongoing Local Plan reviews, these discussions may inform a revised SoCG.

31. Officers in each Local Authority will feedback to senior officers any relevant issues raised in discussions. Likewise, any senior officer level discussions on relevant cross boundary issues will inform discussions.

Signatures

32. Both parties agree that this Statement is an accurate representation of matters discussed and issues agreed upon. We confirm that the information in this Statement of Common Ground reflects the joint working to address identified strategic matters that has been undertaken between the London Borough of Tower Hamlets and the City of London Corporation. The authorities will continue to work collaboratively to address cross-boundary issues and to meet the duty to cooperate.

LONDON BOROUGH OF TOWER HAMLETS

Name: Tom Walsh

Position: Principal Planner, Plan Making Team, Housing and Regeneration Directorate

Signature:



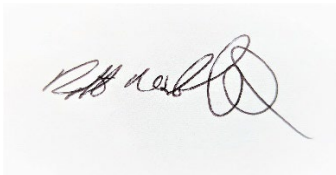
Date: 2/05/2024

CITY OF LONDON CORPORATION

Name: Rob McNicol

Position: Assistant Director (Policy and Strategy)

Signature:



Date: 25/03/2024

14 th April 2015	Tower Hamlets, Hackney and CoL Liaison	Peter Shadbolt, Lewis Claridge	Chris Horton, Alan Hesketh	Discussed Local Plan issues.
8 th February 2016	Tower Hamlets, Hackney and CoL liaison	Peter Shadbolt, Lisa Russell	Chris Horton	Discussed progress of Local Plans.
18 th May 2016	Tower Hamlets, Islington, Hackney and CoL liaison	Peter Shadbolt, Lewis Claridge	Chris Horton	Discussion on tall building policy.
19 th July 2017	Tower Hamlets and CoL	Adrian Roche, Therese Finn	Philip Wadsworth, Rosica Kolarova	Discussed issues relevant to both boroughs.
15 th September 2017	TH, Lambeth, Southwark CoL	Adrian Roche, John Harte	Terunesh McKoy, Catherine Carpenter, Tom Weaver	Discussed issues relevant to all boroughs.
11 th November 2022	Tower Hamlets and CoL Plan Liaison	Peter Shadbolt, Lisa Russell	Matthew Wong, Tom Walsh	Discussed Issues relevant to both boroughs.
19 th October 2023	Tower Hamlets and Islington Joint Duty to Co-operate Meeting	Rob McNicol, Lisa Russell	Matthew Wong, Tom Walsh, Jonathan Gibb	Discussed issues relevant to both boroughs.
25 th October 2023	Tower Hamlets and CoL Duty to Co-operate on waste	Lisa Russell	Tom Walsh	Discussed general waste matters.
3 rd April 2024	Tower Hamlets and CoL Duty to cooperate on tall buildings	Gudrun Andrews, Garima Nayyar, Fiona Williams, Lisa Russell	Steven Heywood, Marc Acton Fillion	Discussed tall buildings evidence and policy.

Appendix 1 – Liaison meetings between City of London and Tower Hamlets

