

# Statement of Common Ground between the City of London Corporation and Westminster City Council

April 2024

## Introduction

This document is the Statement of Common Ground (SoCG) between the City of London Corporation and the City of Westminster.

This SoCG applies to the preparation of the City of London Local Plan (known as City Plan 2040) and the partial review of the Westminster City Council Local Plan (known as City Plan 2019-2040). It sets out details of the cooperation between Westminster City Council and the City of London Corporation during plan preparation and will inform further engagement to ensure effective coordination and implementation of Local Plan policies.

The Westminster City Plan 2019-2040 was adopted by full council on 21 April 2021. It replaced the former Westminster City Plan 2016. Westminster City Council is currently undertaking a partial review to refocus ambitions on building more affordable housing (particularly social housing), prioritising the retrofitting of existing buildings, and incorporating a small number of site allocations. The partial review is due for Regulation 19 consultation in March 2024.

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 Mayor of London considered the draft City Plan 2036 to be in non-conformity with the London Plan 2021, as the plan did not explicitly identify locations that may be appropriate for tall buildings, including associated maximum or appropriate heights, in accordance with Policy D9 of the London Plan. City Plan 2040 is aiming for 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

The SoCG covers the Local Planning Authority areas of the City of London and City of Westminster. The boundaries are showing on figure 1.



Figure 1 The boundary of the City of London and the City of Westminster

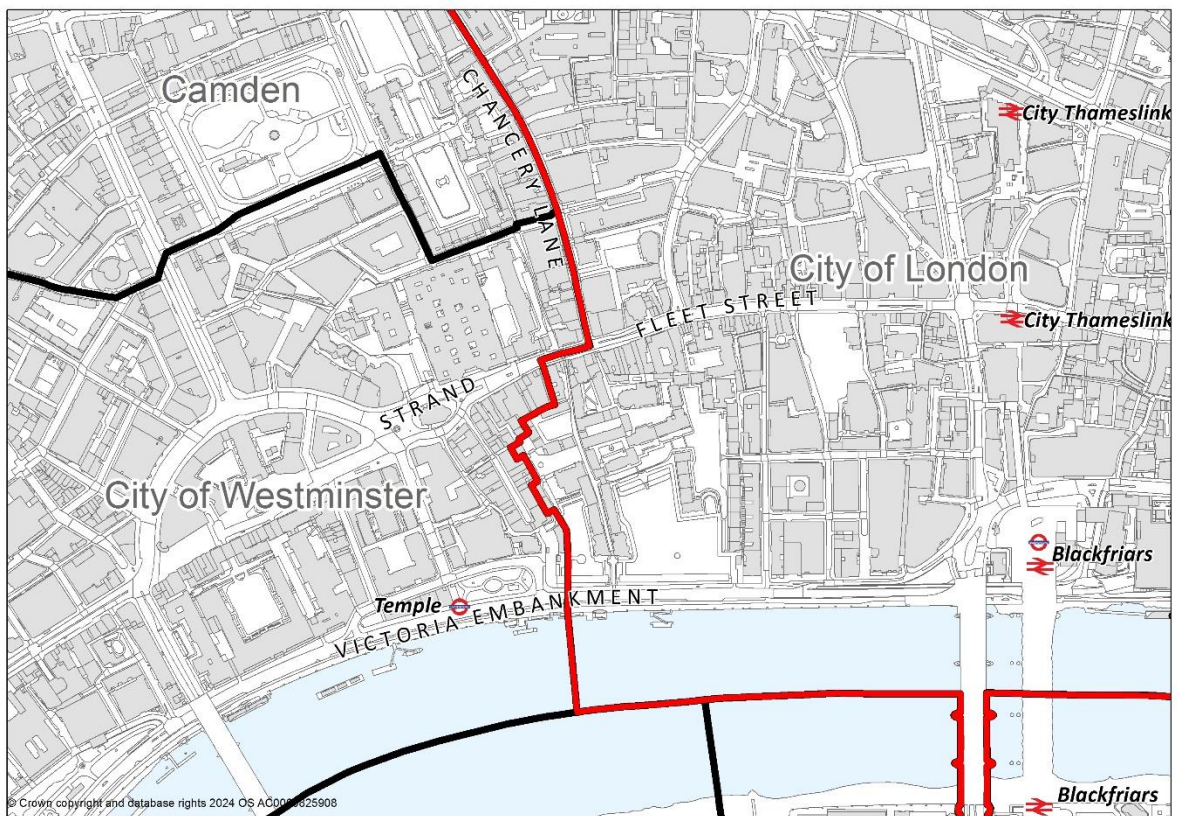


Figure 2 Boundary between the City of London and the City of Westminster

### City of London

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 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.

The City of London and the City of Westminster share a border of 0.75km. Key strategic routes cross the boundary between the City and Westminster, including Embankment and the Strand/Fleet Street. The Processional Route between Westminster and the City (Buckingham Palace and St Paul's Cathedral), has been used on various state occasions in the past and will continue to be used in the future. Within the London Plan 2021's CAZ diagram the legal cluster is identified which encompasses the Inns of Court and the Royal Courts of Justice.

### **City of Westminster**

The City of Westminster stretches over just eight square miles and is one of central London's largest boroughs. Much of Westminster is within the Central Activities Zone (CAZ). Westminster is home to over 211,000 people, 56 conservation areas covering 78% of the City of London's footprint and 789,000 jobs. Professional, business and financial industries make up the largest employment sector, however, Westminster is a global hub for creative industries with 30% of all London's jobs in music, performing arts and visual arts based within the City. Westminster is home to more than 130 major cultural establishments such as Tate Britain and the National Gallery.

### **Key Strategic Matters**

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.

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.

The City of London Corporation and City of Westminster 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 have been held on 8 May 2015, 19 May 2016, 30 June 2017, 16 May 2018, 11 December 2018, 3 February 2021, 18 April 2023, 19 September 2023 and 9 February 2024 (Appendix 1). Liaison has also been conducted through pan-London groups such as London Councils and the Association of London Borough Planning Officers (ALBPO).

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. Westminster and the City of London Corporation are committed to further dialogue moving forward, and not just those limited to periods of plan preparation.

### Tall buildings and protected views

The City Corporation has developed a tall buildings evidence base which includes two tall building clusters: City Cluster and Fleet Valley. The City Corporation undertook a Strategic Views Impact Assessment to understand the impacts from the Mayor's Landmark View Management Framework (LVMF) and Westminster's locally identified views: including from St. James' Park Bridge [LVMF-26a.1], St James's Park Bridge [WCC-mv34b], St James's Park Bridge [WCC-mv34a], Somerset House Terrace [WCC-mv17b], The Strand west, at Burleigh Street [WCC-mv18n], The Strand west, at Burleigh Street [WCC-mv18c], and The Strand west, at Burleigh Street [WCC-mv18s]. We agree that these are the important views that need to be considered as they could be sensitive to further tall building development in the City.

### Central Activities Zone – Office space

Both the City Corporation and City of Westminster play a key role in the Central Activities Zone (CAZ), containing nationally and internationally significant office functions.

The London Plan supports creating and improving the quality, flexibility and adaptability of office space of different sizes. 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. Both the City Corporation and City of Westminster have Article 4 directions to ensure that office areas are not undermined by office to residential permitted development rights.

The London Plan sets out a office floorspace target for the CAZ and NIOD (Northern Isle of Dogs) of 3.5 million sqm from 2016-2041. The City of London Plan seeks to provide a minimum of 1.2 million sqm of additional office floorspace up to 2040, approximately 35% of the total office space required in the London Plan. The office target in the City of London Plan is a major contributor to London's future office supply and economic competitiveness. Westminster's adopted city plan seeks to provide office floorspace to accommodate at least 63,000 new jobs over the plan period.

### Housing

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 Corporation's target is 146 additional residential units per annum up to 2028/29. The target for the plan period is 1,706 units, the housing requirement beyond 2029 is derived from the national standard methodology.

The City of London has a target for 146 dwellings per year and the City of Westminster has a target of 985 dwellings per year. The City of London and Westminster both agree that they can meet or exceed the total numerical housing target assigned to them in the London Plan within their own borders.

The City of Westminster is currently undertaking a Partial Review and are aiming to strengthen their existing affordable housing policies to maximise the provision of affordable housing and in particular social housing.

The City of London and City of Westminster are aligned with the London Plan tenure mix for affordable schemes as the London Plan provides flexibility across affordable housing types required.

### **Retrofit first**

Both the City Corporation and City of Westminster local plans acknowledge 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. Both of the policy approaches are for retrofit first, not retrofit only. These two plans will be the first local plans that seek to introduce policies with a 'retrofit first' policy objective. Whilst both plans share the same objectives, alternative approaches are taken in terms of the technicalities of how and when the policy applies and tests it introduces for new developments to pass. The retrofit fast track approach in policy OF2 of the City of London City Plan 2040 considers the loss of office for a development that would retain the substantial majority of the superstructure of the existing building, lead to an improvement in the environmental performance of a building, and result in a change of use to a hotel, cultural or educational use. In addition, 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.

City of Westminster is looking to introduce a new retrofit first policy as part of its partial review of the City Plan which requires developers to consider retrofit options before demolition, but also offers scope of demolition in certain circumstances – such as where redevelopment can achieve public benefits that a retrofit scheme could not.

### **Riverfront**

The North Bank riverfront is important to both the City of London and the City of Westminster. The City of London has identified Blackfriars (close to the Westminster border and North Bank area) as a key area of change. Westminster and the City share similar ideas for improving the north bank of the Thames such as making the area better connected and pedestrian friendly.

The North Bank riverfront of the City of London and City of Westminster falls under London City Policy Unit of the Thames Estuary 2100 plan. The flood risk layer shows that, in much of the policy unit, there is a 0.1% or higher chance of flooding each year without the existing flood defences. The risk is reduced by defence.

### **Site allocations**

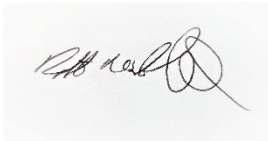
The City of London does not allocate any sites in the City Plan. The partial review of the Westminster City Plan looks to incorporate 4 new site allocations to help shape an unlock development at complex sites (St Mary's Hospital, Royal Oak, Westbourne Park Bus Garage, and Grosvenor Sidings). As these sites are not close to the border with City of London, they do not give rise to any strategic cross-boundary issues.

### Governance arrangements

This SoCG will be updated as each local planning authority reaches a critical stage in plan making and will form a key part of implementation of Local Plan policies and any future Local Plan reviews (for both authorities).

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 status of issues discussed and other factors including ongoing Local Plan reviews, these discussions may inform a revised SoCG.

Officers in each local authority will feedback to senior officers any relevant issues raised in discussions. Likewise, any senior level discussions on relevant crossboundary issues will inform discussions.



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