

**Statement of Common Ground (SoCG) between
City of London Corporation and London Borough of Hackney**

4th June 2025

Chapter 12 Heritage and Tall Buildings

1. Purpose of the Statement of Common Ground

- 1.1. In March 2024 the City Corporation and the London Borough of Hackney agreed a Statement of Common Ground (reference SOCG1: <https://www.cityoflondon.gov.uk/assets/Services-Environment/statement-of-common-ground-hackney.pdf>).
- 1.2. This Statement set out the agreed position on cross-boundary matters and the duty to cooperate, including tall buildings and protected views. Both parties agreed to work together to ensure that strategic views are protected and enhanced and that any cross-boundary impacts from tall buildings on the settings of historic townscapes and landscapes are fully addressed.
- 1.3. The purpose of this SoCG is to update on further discussions in relation to the approach to tall buildings as set out in the City Plan 2040.

2. Parties

- 2.1. The signatories to this SoCG are the City of London Corporation (City Corporation) and the London Borough of Hackney.

3. Background

- 3.1. At Regulation 20 stage Hackney submitted a representation (Reference R0115: [R0115-Liverpool-Street-station.pdf](https://www.cityoflondon.gov.uk/assets/Services-Environment/statement-of-common-ground-Liverpool-Street-station.pdf)). This confirmed that Hackney is supportive of the City Plan vision and objectives and had no objections. It was also supportive of the principle of enhancing Liverpool Street station in the City Plan and its surrounding area. It also highlighted that it is preparing a new Area Action Plan for Shoreditch and is keen to understand how the proposed 1.2 million sqm of office floorspace will be met over the plan period.
- 3.2. A representation was also received from Bluebutton Properties UK Limited identifying additional potential for a tall building at Broadwalk House. An additional Statement of Common Ground was prepared in November 2024 regarding this site, which acknowledges potential for an additional tall building site at Broadwalk House, subject to confirmation in additional Strategic View Impact Assessment and Heritage Impact Assessments (see Statement of Common Ground 19: <https://www.cityoflondon.gov.uk/assets/Services-Environment/statement-of-common-ground-Bluebutton-Properties-UK-Limited-COLC-for-Broadwalk-House.pdf>).

- 3.3. As the Broadwalk House site is located directly on the border of Hackney, in the representations from Bluebutton have been shared with Hackney. City of London shared further [modeling work](#) to consider this site. City of London's suggestion is to update the City Plan to identify a new tall building area and other potential amendments to the tall buildings contours for the City Cluster to suggest a tall building (of 75m+) may be appropriate on the Broadwalk House site. These amendments are included in section 4.5 below.

4. Matters on which parties agree

- 4.1. It is agreed that the Broadwalk House site is immediately adjacent to the borough/City of London border.
- 4.2. Subject to further Strategic View Impact Assessment (SVIA) and Heritage Impact Assessment (HIA) testing the Broadwalk House site is considered potentially appropriate for a tall building as defined within the City Plan (Policy S12: Tall Buildings) of over 75m AOD.
- 4.3. The City of London's tall building clusters are areas which may be suitable for tall buildings. Contour mapping has been used to identify appropriate heights for tall buildings considering the three strategic heritage assets of St Paul's Cathedral; the Monument; and the Tower of London and also the London View Management Framework views.
- 4.4. It is agreed that any tall building proposal on the Broadwalk House site would need to consider the strategic views of the London View Management Framework and any relevant local views, including within LB Hackney, such as those identified in the [South Shoreditch Conservation Area Appraisal & Management Plan & emerging Future Shoreditch Area Action Plan](#). Any tall building proposal on the site would need to take into account local site-specific factors including the presence of the South Shoreditch Conservation Area which lies to the north-west of the site, along with the other heritage assets, such as the Grade II* listed Webb Terrace.
- 4.5. Both parties agree the following proposed amendments to **Policy S25** and its supporting text will assist in relation to future development proposals on the site. These are in addition to the requirements of Policies S11, S12 and HE1 as set out below:

Strategic Policy S11: Historic Environment- 2. Conserving and enhancing heritage assets and their settings; opportunities will be sought for development proposals to make a positive contribution to, and better reveal the significance of, heritage assets and reflect and enhance local character and distinctiveness;

Policy S12: Tall Buildings: 8. (b) the character and amenity of their surroundings, including the relationship with existing and consented tall buildings; c. the significance of heritage assets and their immediate and wider settings; 10. (d) make a positive contribution to the townscape character;

Policy HE1: Managing Change to the Historic Environment - Development proposals that affect heritage assets or their settings should be supported by a Statement of Heritage Significance and a Heritage Impact Assessment. It should be ensured any impacts of the proposals on the significance of heritage assets or their settings have been fully assessed and understood


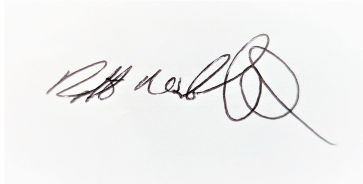
Policy/paragraph	Amendments
Policy S25: Liverpool Street	<p>Additional bullet:</p> <p><u>12. Supporting development which preserves and enhances Conservation Areas and their settings, including South Shoreditch Conservation Area which lies to the north-west of the site, any relevant local views along with other heritage assets, such as the Grade II* listed Webb Terrace.</u></p>
14.10.1	<p>14.10.1 Where feasible, additional urban greening and the creation of green urban spaces will be encouraged. Impact of development on local views, heritage assets and <u>the Bishopsgate and New Broad Street Conservation Areas and the South Shoreditch Conservation Area in LB Hackney will be material considerations in decision-making. All proposals for taller buildings must respect local character and historic townscapes including those in adjoining boroughs.</u></p>
Policies Map	<p><i>Proposed amendments to include a new tall buildings site at Broadwalk House as below:</i></p>  <p>The map shows a site at Broadwalk House outlined in red. A key indicates height contours in meters: 75 (yellow), 80 (orange), 90 (red), 100 (dark red), 120 (purple), 140 (blue), and 160 (green). A dashed line represents contours that conflict with local heights. The map is titled 'CITY OF LONDON LOCAL PLAN MAY 2025 AMENDMENTS TO SUBMITTED PLAN POLICIES MAP E May 2025 Broadwalk Tail Building Site'. It includes a scale of 1:1000 and the City of London Environment Department logo.</p>
Figure 14	<p><i>Change to show Broadwalk House Site as an area suitable for tall buildings</i></p>

Figure 15	<i>Change to show Broadwalk House site contours</i>
11.5.4	<p><i><u>For the purposes of Policy D9 of the London Plan, the The tall buildings areas identified as being appropriate locations for tall buildings are the City Cluster, and Fleet Valley and Broadwalk House site areas. A comprehensive analysis of the character of the City informed the location of these tall building areas. The study found that, given its historic nature, and the prominence in local and wider strategic views, all parts of the Square Mile are sensitive or very sensitive to <u>new</u> tall buildings. The City Cluster and Fleet Valley areas are the only broad areas found to be less sensitive and less constrained relative to other areas. Outside the identified tall building areas, <u>new tall buildings, particularly on sites where there is no tall building currently, would be likely to have significant impacts on heritage assets and on protected views from places within and outside the Square Mile, and could significantly undermine the prevailing townscape and character of the area.</u></u></i></p>
11.5.6	<p><i>11.5.6 The heights of the buildings in the City Cluster, and Fleet Valley and Broadwalk House site areas were determined through extensive three dimensional modelling and mapping, informed by a detailed assessment of how the proposed massing of tall buildings in these areas could potentially impact the wider City and pan-London skyline. Both <u>These</u> areas were assessed based on the London Views Management Framework (LVMF), St Paul's Heights, Monument Views, Tower of London approaches and representative views.</i></p>

Matters on which parties do not agree: .

4.6 Hackney suggested adding to the supporting text on paragraph 14.01.1 identifying that shoulder setbacks form a consistent building typology on Hewett Street/ Curtain Road (east)/ Appold Street in response to the South Shoreditch Conservation area. Hackney suggested it would be beneficial to add this wording to supporting text to 14.10.1. The City of London considers this is appropriately covered through other policies in the City Plan.

Signed on behalf of City of London Corporation:

A handwritten signature in black ink, appearing to read 'Rob McNicol', written on a light grey rectangular background.

Rob McNicol

Assistant Director – Planning Policy & Strategy City
of London Corporation

Signed on behalf of the London Borough of Hackney:

A handwritten signature in black ink, appearing to read 'Natalie Broughton', written on a light grey rectangular background.

Natalie Broughton

Assistant Director
London Borough of Hackney