

**Statement of Common Ground (SoCG) between  
City of London Corporation and Historic England**

**6 June 2025**

**Chapter 11 Heritage and Tall Buildings**

**1. Purpose of the Statement of Common Ground**

- 1.1. In November 2024 the City Corporation and Historic England agreed a Statement of Common Ground (reference SOCG9: <https://www.cityoflondon.gov.uk/assets/Services-Environment/Statement-of-Common-Ground-Historic-England-City-of-London.pdf> )
- 1.2. The purpose of this SoCG is to update on further discussions in relation to the approach to heritage and 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 Historic England.

**3. Background**

- 3.1. The local plan examination hearings commenced in late March 2025. During initial legal and procedural discussions the Planning Inspectors requested that the City Corporation works with Historic England (HE) and other heritage bodies to seek to reach some additional agreement on outstanding heritage matters.
- 3.2. A series of meetings took place in April and May 2025. The focal points of discussions were the approach to the tall buildings contours as set out in Policies Map C (see <https://www.cityoflondon.gov.uk/assets/Services-Environment/Policies-Maps-City-Plan-2040-2024.pdf>) in relation to the three strategic landmarks.
- 3.3. Historic England has proposed some suggested amendments to the City Plan policies within Chapter 12 Heritage and Tall Buildings which would seek to address a number of their concerns. These changes are included within section 4 and 5 below. HE has also made some proposals for revisions to the contour lines, which are discussed in section 6 below.
- 3.4. The City Corporation also showed some potential further changes to the south-eastern edge of the City Cluster tall building contours, which arose from other Statements of Common Ground with developers at New London House, 30 Fenchurch Street and 1-2 Minster Court. The City Corporation also shared a potential tall building envelope for a site at Broadwalk House to the north of Liverpool Street station. These potential further

changes to the contours were subject to a separate consultation and are not addressed as part of this SoCG. Historic England responded to these proposed changes as a Hearing Statement addendum on 31 May 2025.

**4. Changes proposed by Historic England on which parties agree**

4.1. Both parties have agreed the following changes to the City Plan:

*Table 1- Agreed changes*

	<b>Historic England proposed changes</b>	<b>City Corporation position</b>
HE1	6. Development in conservation areas should preserve, and where possible, enhance and better reveal the character, appearance and significance of the conservation area and its setting. The buildings and features that contribute to the character, appearance, setting or significance of a conservation area should be conserved and opportunities to enhance conservation areas should be <del>considered</del> <b>sought where appropriate.</b>	Agreed
S12	3. The maximum permissible tall building heights within the identified tall building areas are depicted as contour rings on Policies Maps C and D and Figure 15. Tall buildings should not exceed the height of the relevant contour rings. In areas between the contour rings, tall buildings should be designed to successfully mediate between the contour ring heights and should not exceed the next higher contour. Tall buildings should not necessarily be designed to maximise height; instead they should be thoughtfully designed to create built form that contributes positively to the skyline and <b>respects both heritage significance and townscape character</b> , creating a coherent cluster form and a varied and animated skyline, and should have architectural integrity.	Agreed
S12	5. The suitability of sites for tall buildings within the identified areas <b>will depend on the sensitivity of the relevant context to such proposals.</b> <del>and</del> Their design, height, scale and massing should ensure that they <del>take into consideration local</del> <b>preserve and enhance the significance of</b> heritage assets and <b>take into consideration</b> other <del>localised</del> factors relating to townscape character and microclimate.	Agreed

S12	8c. the significance of heritage assets and their <del>immediate</del> <b>and wider</b> settings.	Agreed – this would not compromise the operation of the ‘Immediate Setting’ policy mechanism.
11.5.12	All tall building proposals should be accompanied by a Heritage Townscape Visual Impact Assessment that includes computer generated visualisations to illustrate the likely visual impacts of the proposed development, taking account of the cumulative impact of other proposed, permitted and existing tall buildings. Digital massing models of tall buildings should be submitted, in appropriate formats. The City Corporation will use these models to assess the impact of tall buildings on the local, City-wide and London-wide <b>historic environment</b> , townscape and skyline, <b><u>including their cumulative effects.</u></b>	Agreed
11.5.13	Within and in close proximity to the City Cluster, there are numerous heritage assets with the potential to be affected by tall buildings <b><u>including a number of conservation areas partially within the Cluster itself.</u></b> The location, siting, bulk, massing, height and design of tall buildings should be informed by the potential impact on <u>all</u> heritage assets, while recognising the juxtaposition of old and new architecture that already exists and that, in many instances, makes a positive contribution to the character of the Square Mile.	Agreed
S21	6. Ensuring development proposals have regard to the <del>immediate</del> setting of Bevis Marks Synagogue ( <del>as set out in the Policy Map</del> ). Developments should form a positive relationship with the Synagogue without dominating or detracting from its architectural and historic value; and ensuring that the historic elements of the Synagogue’s setting are preserved and enhanced.	Agreed

**5. HE further comments and proposed changes to HE1 on which parties have reached some agreement**

- 5.1. HE considers it important that the plan is sufficiently clear that the ‘immediate setting’ mechanism proposed by the City Corporation is intended to strengthen broader policy protection for the setting of heritage assets and therefore does not undermine it. HE notes the City Corporation’s intention, as set out in the Bevis Marks immediate setting policy paper, to update and publish a revised Protected Views Supplementary Planning Document (SPD), or equivalent, once the City Plan 2040 is adopted. HE considers it essential that any future guidance is informed by genuine consultation and a full understanding of the settings of the heritage assets concerned. HE therefore suggests that the findings and recommendations of the new St Paul’s Setting Study (prepared for St Paul’s Cathedral and Historic England) will also be a valuable source of information. It would be helpful if the City Plan referred to this document as a source of information to inform development proposals and decisions.
- 5.2. Table 2 sets out HE’s further proposed changes to Policy HE1 on which the parties have reached some degree of agreement. Alternative changes have been put forward by the City of London Corporation. No further agreement has been reached in relation to the inclusion of a clause stating that tall buildings are inappropriate in conservation areas, which is covered by section 9 of the Initial Statement of Common Ground dated 25/11/2024 (SOCG9).

Table 2 – Additional proposed changes to Policy HE1

	<b>Historic England proposed changes</b>	<b>City Corporation position</b>	<b>HE position</b>
HE1	8. Development in the defined immediate setting of Bevis Marks Synagogue and The Monument <del>should</del> <b>will be carefully managed to</b> preserve, and where possible, enhance the elements of setting that contribute to the significance of these heritage assets, <b>including those associated with the distinct enclosures that surround them.</b>	The CoLC agrees to the first change.  The change relating to ‘distinct enclosures’ is not agreed, as this a point of detail that is better covered in the supporting text, not least as it is only relevant to the Synagogue, not the Monument, where enclosure is not a significant aspect of setting.  <i>CoLC proposed wording:</i>  8. Development in the defined immediate	HE queries whether the policy text could be adjusted to incorporate the wording now proposed in supporting text at 11.2.1, i.e.  <b><u>“This includes features and characteristics of the enclosures around them, and the space that remains.”</u></b>

		<p>setting of Bevis Marks Synagogue and The Monument <del>should</del> <b>will be carefully managed</b> to preserve, and where possible, enhance the elements of setting that contribute to the significance of these heritage assets</p>	
<p>11.2.1</p>	<p>The City Corporation has identified ‘immediate setting’ areas around the Monument and Bevis Marks Synagogue, both of which are Grade I listed heritage assets in the City (<b><u>the Monument is also scheduled</u></b>) and require special consideration and protection, given their outstanding architectural and historic significance and, for these particular buildings, the critical contribution of setting to that significance. <b><u>This includes features and characteristics of the enclosures around them, and the space that remains. It should be noted that the contribution that any part of the totality of a setting makes to the significance of a designated heritage asset is afforded protection by relevant legislation, national policy and Policy HE1. This would include protection from development that impacts on the sky space in views,</u></b></p>	<p>The CoLC agree to most of these amendments. However, the CoLC do not agree with the proposed amendment that refers to <i>protection from</i> development that impacts on the sky space in views -rather, CoLC believe that this should refer to the need to give consideration, which better reflects the statutory and policy tests.</p> <p>The CoLC proposes the following wording:</p> <p>The City Corporation has identified ‘immediate setting’ areas around the Monument and Bevis Marks Synagogue, both of which are Grade I listed heritage assets in the City (<b><u>the Monument is also scheduled</u></b>) and require special consideration and protection, given their outstanding architectural and historic significance and,</p>	<p>Agreed</p>

	<p><b><u>where this enables aspects of their significance to be appreciated. The identification of the immediate settings of the Monument and Bevis Marks synagogue in policy is therefore intended to further strengthen their protection.</u></b></p>	<p>for these particular buildings, the critical contribution of <b><u>their immediate</u></b> setting to that significance. <b><u>This includes features and characteristics of the enclosures around them, and the space that remains.</u></b></p> <p><b><u>It should be noted that the contribution that any part of the totality of a setting makes to the significance of a designated heritage asset is afforded protection by relevant legislation, national policy and Policy HE1. This would include consideration of impacts on sky space in views, where this enables aspects of their significance to be appreciated. The identification of the immediate settings of the Monument and Bevis Marks synagogue in policy is therefore intended to further strengthen their protection.</u></b></p>	
<p>11.2.13</p>	<p>The City Corporation’s Character Areas Study provides an overview of the City’s overall significance including a Statement of Significance for key strategic assets, like St Paul’s Cathedral; The Monument; and the Tower</p>	<p>The CoLC agree with this addition but would like a minor tweak to recognise that not every single aspect of the study are matters that the CoLC agree with.</p>	<p>Agreed</p>

	<p>of London. It identifies the principle attributes that contribute to the significance of these assets and their settings, which should be protected, enhanced, better revealed or celebrated. The study also divides the City into nine character areas having shared characteristics, and provides a thorough assessment of the core heritage typologies in the area, highlighting the key aspects that contribute to their significance. <b><u>The St Paul’s Setting Study (commissioned and produced by Historic England and the Cathedral) offers further helpful detail and advice on how the setting of the Cathedral can be considered and managed in relation to development proposals in order to conserve its role in contributing to significance.</u></b> Applicants should draw reference to the Character Areas Study <b><u>and the Setting Study (where appropriate)</u></b> to understand their site’s significance and the key attributes of significance they should consider.</p>	<p>The CoLC proposes the following wording:</p> <p>The City Corporation’s Character Areas Study provides an overview of the City’s overall significance including a Statement of Significance for key strategic assets, like St Paul’s Cathedral; The Monument; and the Tower of London. It identifies the principle attributes that contribute to the significance of these assets and their settings, which should be protected, enhanced, better revealed or celebrated. The study also divides the City into nine character areas having shared characteristics, and provides a thorough assessment of the core heritage typologies in the area, highlighting the key aspects that contribute to their significance. <b><u>Many aspects of the St Paul’s Setting Study (commissioned and produced by Historic England and the Cathedral) offers further helpful detail and advice on how the setting of the Cathedral can be considered and managed in relation to development proposals</u></b></p>	
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		<p><b><u>in order to conserve its role in contributing to significance.</u></b> Applicants should draw reference to the Character Areas Study <b><u>and the Setting Study (where appropriate)</u></b> to understand their site’s significance and the key attributes of significance they should consider.</p>	
11.6.6a	<p><b><u>A revised and updated Protected Views Supplementary Planning Document (SPD) will be produced by the City Corporation, and will be informed by both public consultation and the evidence and views gathered as part of the plan making process.</u></b></p>	Agreed	

**6. Changes to contour lines proposed by HE**

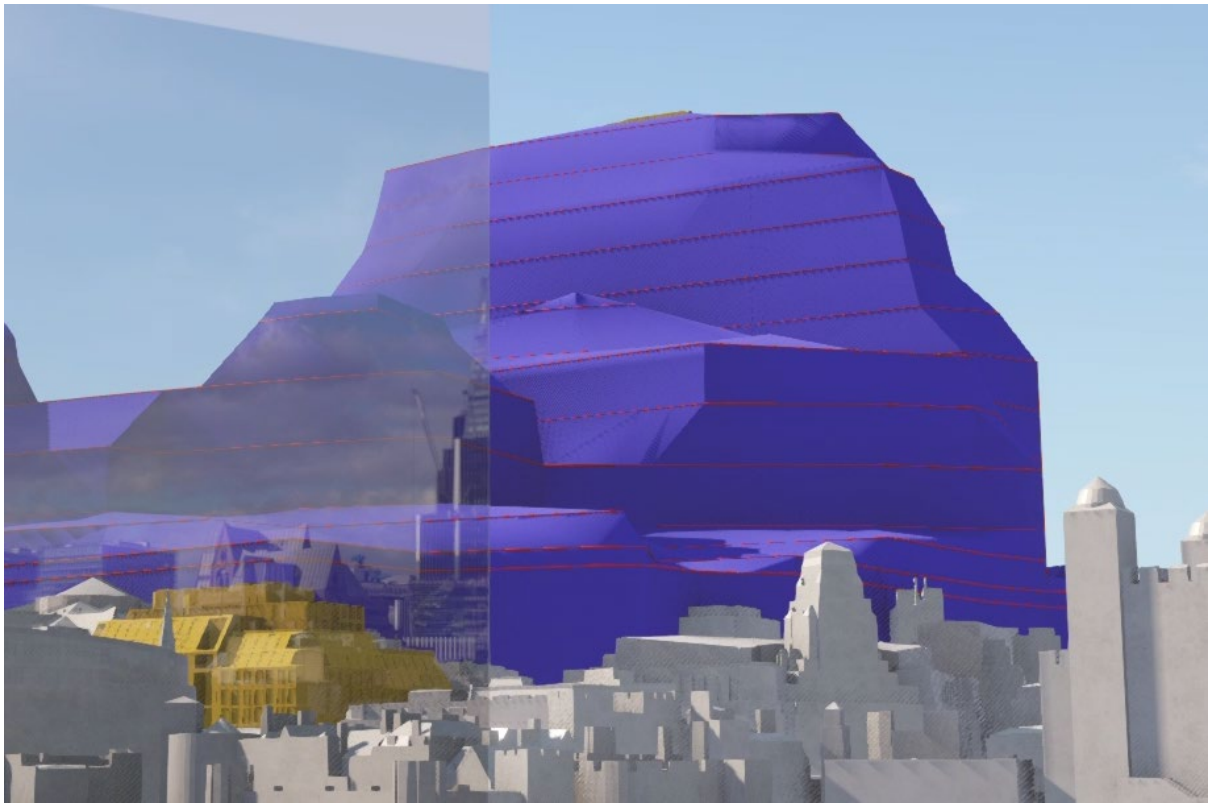
- 6.1. The following paragraphs set out the respective positions of HE and CoLC on matters of disagreement related to proposed changes by HE and Bevis Marks Synagogue to the City Cluster contour lines.
- 6.2. HE has used the City Corporation’s digital model of the proposed City Cluster to identify potential revisions to the expanded profile as set out at Regulation 19 and as a result has requested that the Corporation make consequent changes to the relevant contour lines contained within policy S12 tall buildings. HE’s proposed revisions have been shared to further discussion with the City Corporation and do not necessarily represent HE’s final position on the issue. Given the examination timetable, and given our desire to find further common ground with the City Corporation, HE has focussed on identifying revisions at the eastern edge of the expanded City Cluster. The proposed revisions do not therefore address HE’s concerns in relation to all heritage assets, and should not be understood as a solution to all of the issues HE has previously identified with the expanded Cluster or with the City Plan more broadly. Nevertheless, HE considers the revisions would reduce the harmful effects of the Cluster profile on the OUV of the Tower of London WHS in a meaningful way, although the harmful effects would not be eliminated completely. HE is keen to continue discussions on revisions to the contour lines with the City Corporation and other stakeholders to see whether further common ground can be reached on ways to address impacts on the historic environment. In this

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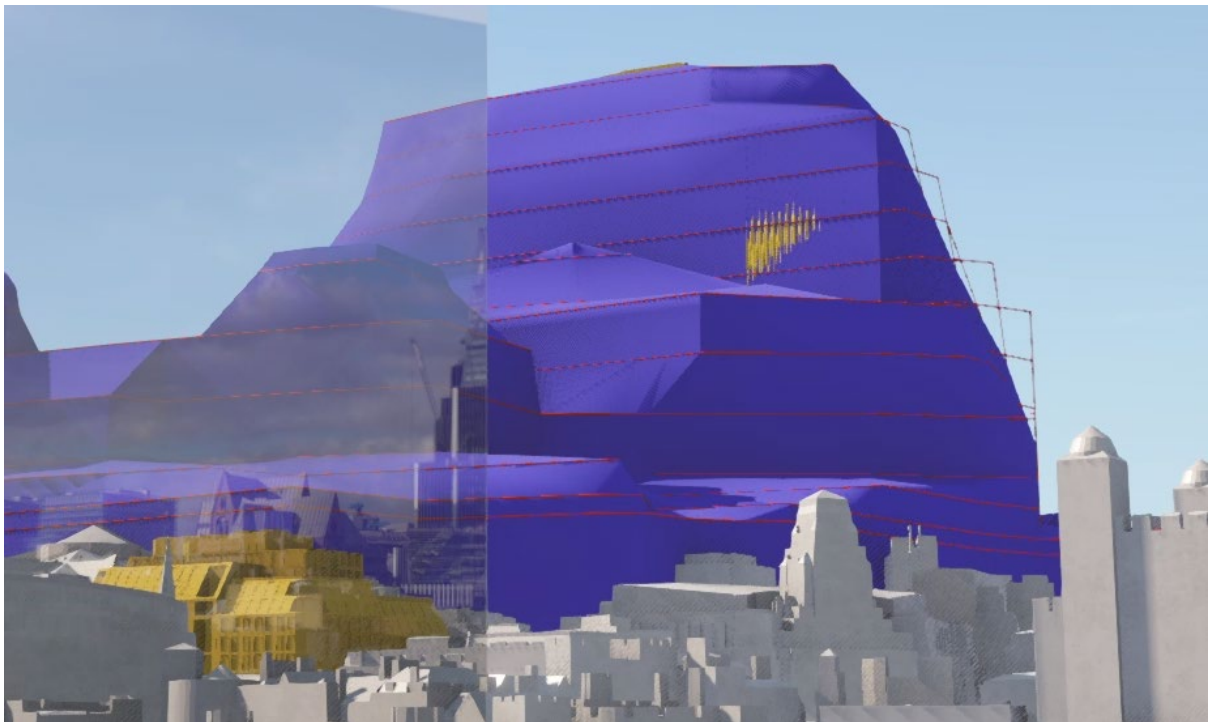
regard, HE is mindful that international bodies have not had sight of its proposed revised modelling.

It should be noted that the proposals in the second illustration below are indicative only and HE is willing to work further with the City Corporation and other stakeholders in order to derive amended contour lines from them.

Regulation 19 proposals – view from LVMF 10A1



Historic England proposed amendments to eastern edge of City Cluster June 2025 (with Regulation 19 proposed contour lines) – view from LVMF 10A1



- 6.3. The CoLC has given careful consideration to the proposed amendments to the City Cluster put forward by HE. The CoLC do not consider that these amendments would ensure that the Plan delivers sustainable development for the Square Mile. The CoLC remain of the view that the contours put forward at Regulation 19 stage, and as amended (set out in the Revised Policies Map, ref. LD31), would successfully minimise the possibility of harm to the setting and Outstanding Universal Value of the Tower of London World Heritage Site from development within the City Cluster. The CoLC have established that the amendments put forward by HE could lead to a loss of potential additional floorspace capacity of around 32,000sqm (NIA), although it should be noted that the detailed figures underlying these calculations have not been shared with HE at the time of this SoCG, due to the commercial sensitivity of this data. This is equivalent to between 2-3% of the City's minimum floorspace demand of 1.2m sqm, equating to sufficient space for around 2,000 jobs or more. As the City's floorspace demand will come forward up to 2040, the loss of capacity would equate to around half of one year's requirement, taken as an average. These capacity calculations have not factored in the degree to which such changes may affect the viability and deliverability of sites that would be impacted by the proposed changes.
- 6.4. HE understands that Bevis Marks Synagogue has separately commissioned and produced modelling and potential amendments to the contour lines, which seek to address the harmful impacts of the modelled policy s12 contours (as at Regulation 19 consultation stage) on the setting of the synagogue. HE would support further amendments to the contour lines that ensure effective protection of the synagogue's significance.
- 6.5. The CoLC have carefully considered the proposed amendments to the contours that have been produced by Bevis Marks Synagogue. The CoLC remain of the view that these amendments are not necessary to ensure that sufficient protection is given to the Synagogue as a Grade I listed building. While the CoLC recognises the great importance of Bevis Marks Synagogue, the contour modelling for the tall building clusters in the Square Mile have not been directly informed by individual buildings other than the three strategic landmarks, as to do so would not be proportionate or appropriate for the plan-making process. Policies S11, HE1, S12 and S21 – together with the protection afforded the Synagogue by legislation – are sufficient to ensure the right level of protection from development within its setting (taken as a whole).

Signed on behalf of City of London Corporation:



**Rob McNicol**

SOCG9A

Assistant Director – Planning Policy & Strategy

City of London Corporation

Signed on behalf of Historic England

A handwritten signature in black ink, appearing to read 'Tim Brennan', is written over a faint, repeating watermark of the word 'electronic'.

**NAME** Tim Brennan

**TITLE** Historic Environment Planning Adviser

Historic England