

**Statement of Common Ground (SoCG) between
City of London Corporation and the S&P Sephardi Community**

6 June 2025

Chapter 11 Heritage and Tall Buildings

1. Purpose of the Statement of Common Ground

- 1.1. On 4 March 2025 the City Corporation and S&P Sephardi Community agreed a Statement of Common Ground (reference SOCG24: <https://www.cityoflondon.gov.uk/assets/Services-Environment/socg24-bevis-marks-synagogue.pdf>)
- 1.2. This Statement set out positions on matters related to heritage and tall buildings, with particular reference to the Bevis Marks Synagogue. The purpose of this SoCG addendum is to update on further discussions and proposed changes within the City Plan 2040.

2. Parties

- 2.1. The signatories to this SoCG are the City of London Corporation (City Corporation) and the S&P Sephardi Community.

3. Background

- 3.1. At Regulation 20 stage a representation was received (R0096: <https://www.cityoflondon.gov.uk/assets/Services-Environment/R0096-Bevis-Marks-Synagogue.pdf>). The previous Statement of Common Ground proposed some minor changes to paragraph 11.2.6. Further and ongoing discussions have taken place in advance of the heritage and tall buildings examination hearing sessions on 10 and 11 June, and further agreement has been reached on some matters.

4. Matters on which parties agree

- 4.1. The following proposed changes have been agreed:

Policy	Proposed changes
S12	5. The suitability of sites for tall buildings within the identified areas <u>will depend on the sensitivity of the relevant context to such proposals.</u> and Their design, height, scale and massing should ensure that they <u>take into consideration local preserve and enhance the significance of heritage assets and take into consideration other</u> localised factors relating to townscape character and microclimate.

S21	6. Ensuring development proposals have regard to the immediate setting of Bevis Marks Synagogue (as set out in the Policy Map). (Remainder of S21(6) discussed below in Section 5)
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5. Matters on which parties disagree

	S&P Sephardi Community	City of London Corporation
HE1	<p>Policy HE1(6) should state that tall buildings are inappropriate within conservation areas, reflecting long-standing policy in this area.</p> <p>Proposed wording:</p> <p>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 considered sought, where appropriate. Tall buildings are unlikely to conserve and enhance conservation areas and are therefore inappropriate in these areas.</p>	<p>The City Corporation do not agree that HE1(6) should state that tall buildings are inappropriate in conservation areas. However, the following wording is proposed, to clarify that opportunities to enhance conservation areas should be actively sought, rather than considered:</p> <p>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 considered <u>sought where appropriate.</u></p>
11.5.13	<p>The ‘juxtaposition of old and new’ does not in all cases make a positive contribution to the setting of heritage assets. The S&P Community do not feel that this phrase is appropriate in a paragraph discussing the potential impacts on heritage assets.</p> <p>Proposed change:</p> <p>Within and in close proximity to the City Cluster, there are numerous heritage assets with the potential to be affected by tall buildings <u>including a number of conservation areas</u></p>	<p>The following wording is proposed, to recognise that the City Cluster contains numerous heritage assets:</p> <p>Within and in close proximity to the City Cluster, there are numerous heritage assets with the potential to be affected by tall buildings <u>including a number of conservation areas partially within the Cluster itself.</u> 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</p>

	<p>partially within the Cluster itself. The location, siting, bulk, massing, height and design of tall buildings should be informed by the potential impact on all 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.</p>	<p>that already exists and that, in many instances, makes a positive contribution to the character of the Square Mile.</p>
<p>S21 or 11.2.1</p>	<p>Propose additional wording to bullet 6 of S21 as below:</p> <p><i>Developments should form a positive relationship with the Synagogue without dominating or detracting from its architectural, historic, cultural and religious value; and ensuring that the historic elements of the Synagogue’s setting <u>including its clear sky backdrop</u> are preserved and enhanced.</i></p> <p>The proposed changes to the supporting text are noted and the intention is welcomed; however to ensure sufficient protection to the synagogue, suitable policy wording is required. The clear sky backdrop is fundamentally important to the heritage, cultural and religious value of the synagogue and should be referenced specifically in policy.</p>	<p>The CoLC do not agree with the proposed amendment to refer to the clear sky backdrop in policy S21. However, the CoLC are content to include wording to paragraph 11.2.1 (supporting text of Policy HE1) to refer to the need to give consideration to impacts on sky space in views. The following change is proposed, which is based on (but amended from) a proposed change by Historic England:</p> <p>11.2.1 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 (the Monument is also scheduled) and require special consideration and protection, given their outstanding architectural and historic significance and, for these particular buildings, the critical contribution of their immediate setting to that significance. <u>This includes features and characteristics of the enclosures around them, and the space that remains.</u></p> <p><u>11.2.1a 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</u></p>

		<p><u>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></p>
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- 5.1. S&P Sephardi Community have prepared proposed amendments to the City Cluster tall building contours, as set out in representation REP-R0096-002 (HGH Consulting obo S&P Sephardi Community MM7 addendum).
- 5.2. The CoLC have carefully considered the proposed amendments to the contours that have been produced by S&P Sephardi Community. 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 which have a pan-City skyline presence, 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).
- 5.3. The S&P Sephardi Community consider that Bevis Marks Synagogue is a strategically significant heritage asset and should be treated as equivalent to St Paul’s Cathedral and The Monument within the City Plan.
- 5.4. Given commercial sensitivities, and the fact that the proposed changes would affect a very limited number of sites, the CoLC are not able to provide significant commentary about the potential capacity calculations undertaken by S&P Sephardi Community regarding which sites have been included in the CoLC’s overall capacity figure. However, the CoLC consider that the underlying methodology undertaken by S&P Sephardi Community in respect of this work appears sound.
- 5.5. The S&P Sephardi Community’s MM7 Addendum also sets out their position that the immediate setting policy does not specify what protection it would provide. The Community’s view is that it should restrict buildings within the immediate setting to the height of the existing buildings as the default.

Signed on behalf of City of London Corporation:



Rob McNicol

SOCG24A

Assistant Director – Planning Policy & Strategy

City of London Corporation

Signed on behalf of the S&P Sephardi Community:

A handwritten signature in black ink, appearing to read 'R. Hepher', written in a cursive style.

Roger Hepher

Executive Director, hgh Consulting

On behalf of the S&P Sephardi Community