

**Statement of Common Ground 13 Addendum (SoCG) between
City of London Corporation and the Mayor of London**

21 February 2024

Chapter 11 Heritage and Tall Buildings

1. Purpose of the Statement of Common Ground Addendum

- 1.1. On the 25th November 2024 the City Corporation and the Mayor of London agreed a Statement of Common Ground (SOCG 13).
- 1.2. SOCG13 set out how agreement had been reached with respect to issues the GLA raised regarding chapter 4 (Housing) of the City Plan 2040, and four other minor points across the Health, Transport, Climate Resilience and Implementation chapters. It also confirmed that both parties agree that the Heritage and Tall Buildings policies of the City Plan are consistent with London Plan Policy D9.
- 1.3. SOCG 13 also set out four more detailed areas within the Heritage and Tall Buildings Chapter where the Mayor and the City Corporation had not come to an agreement.
- 1.4. This purpose of this addendum to SOCG 13 is to provide an update on further discussions.

2. Parties

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

3. Outstanding disagreement from SOCG 13

- 3.1. Table 3 in SOCG13 sets out the matters that were not agreed at that time. These were:
 - Alignment with HC2 World Heritage Sites Part A (including policies)
 - Alignment with HC2 World Heritage Sites Part D (utilising WHS Management Plans to inform plan-making; especially how the Cluster modelling exercise was informed by the Tower's OUV)
 - Reference to GLA Practice Note: Heritage Impact Assessments and Historic Buildings

4. Update on conformity with LP policy HC2

- 4.1. The Mayor of London stated in SOCG13 that:

'It is not clear how the currently proposed shape of the jelly mould meets the requirements of Policy HC2; specifically how it promotes, actively protects and interprets the OUV of the ToL WHS. It is noted that Policy HE3 and Policy S11 of the draft City Plan largely reflect and repeat what is contained in LP2021 Policy HC2. The policy does not interpret the OUV of the ToL WHS or consider impacts on its wider

setting. For these reasons it is considered that the requirements of Policy HC2 have not been met in full.’

- 4.2. The City Corporation has produced a note (*‘City Plan 2040 and London Plan policy HC2: World Heritage Sites’ (or the ‘Cluster and OUV note’)*) that explains in detail how the WHS management plan and OUV set out therein was used to inform the evidence base and modelling of the Cluster contour lines. This note is appended to this SOCG addendum and will be appended to Matters Statement 7: Heritage and Tall Buildings.
- 4.3. The City Corporation has suggested an additional paragraph after paragraph 11.4.0 of City Plan, to state more clearly that the ToL OUVs have been interpreted as part of policy S12.

‘The City Corporation has interpreted the ToL’s OUV through an analysis of attributes and this has informed the contour lines of the City Cluster in policy S12. Policy HE3 preserves, and seeks to enhance, the ToL’s OUV, as experienced in the relevant views, including those where the City Cluster is visible.’

‘Applicants will be required to submit a Heritage Impact Assessment along with the planning application that shows how the OUV of the Tower of London has been interpreted’

5. Comments by both parties on outstanding matters

- 5.1. Table 1 below sets out the matters which have been agreed in this SOCG addendum.

Table 1- Matters agreed in this SOCG addendum

Topic/Matter	City Corporation	Mayor of London
Evidence behind tall buildings cluster approach and how it is informed by the ToL OUV	The <i>‘Cluster and OUV note’</i> note explains how the attributes of OUV were considered and informed the evidence and the form of the tall building cluster.	Noted
Alignment with HC2 World Heritage Sites Part A (including policies)	The <i>‘Cluster and OUV note’</i> shows how the City Plan meets the expectations of HC2(a). An additional paragraph could be added after paragraph 11.4.0 to explain how an interpretation of the OUV informed policy S12.	Request the following amendment to the text set out in para 4.3 above: “The City Corporation has interpreted the ToL’s OUV through an analysis of attributes and this has informed the contour lines of the City Cluster in policy S12. Policy HE3 seeks to conserve and enhance the ToL’s OUV, as experienced in the relevant views, including those where the City Cluster is visible.” “Applicants will be required to submit a Heritage Impact

		Assessment along with the planning application that shows how the OUV of the Tower of London has been interpreted.”
Alignment with HC2 World Heritage Sites Part D (utilising WHS Management Plans to inform plan-making) Due consideration of the wider context and surroundings of the OUV and how it has informed the evidence base and contour lines (London Plan paragraphs 7.2.1 and 7.2.2)	The ‘ <i>Cluster and OUV note</i> ’ discusses how the WHS Management Plan has informed the evidence base and contour lines.	See above

Signed on behalf of City of London Corporation:



Rob McNicol

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City of London Corporation

Signed on behalf of the Greater London Authority:



Lucinda Turner

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