

**Statement of Common Ground (SoCG) between
City of London Corporation and SEA Profit Holdings Ltd**

In relation to 33 Old Broad Street

22 November 2024

Chapter 11 Heritage & Tall Buildings

1. Purpose of the Statement of Common Ground

- 1.1. The purpose of this SoCG is to update the local plan Inspector/s and other parties in relation to matters raised within Regulation 20 representations. The topics covered in this SoCG are heritage and tall buildings.
- 1.2. This SoCG has been prepared post submission of the City Plan 2040 on 29 August 2024. It highlights matters where agreement has been reached, and areas where agreement has not yet been reached but will be subject to further discussion at the local plan examination hearings.
- 1.3. This SoCG is in addition to any other matters statements to be produced during the course of the examination by either party.

2. Parties

- 2.1. The signatories to this SoCG are the City of London Corporation (City Corporation) and SEA Profit Holdings Ltd.

3. Comments received at Regulation 20

- 3.1. SEA Profit Holdings Ltd submitted their response to the Regulation 19 City Plan on 17 June 2024. This raised questions in relation to the approach to tall buildings and heritage (Chapter 11).
- 3.2. Table 1 below includes the relevant reference number of the comments to which this SoCG relates, both parties agree this is a true record of the main matters subject to this SoCG.

Table 1- Representation references

Comment ID	Chapter	Summary	Section of SoCG
R0169/C0002	Chapter 11 Heritage & Tall Buildings	The contour lines proposed onsite restrict the ability to use the existing structure and the ability to add sufficient office floorspace to make a retrofit or redevelopment viable.	Disagree
R0169/C0004	Chapter 11 Heritage & Tall Buildings	Revisions to the interpretation of the contour rings to favour the higher height in mediation to optimise the cluster's volume.	Disagree

4. Matters on which parties agree

- 4.1. Both parties agree on the approach taken to identifying permissible heights within the City Cluster through the use of the contours mapping.
- 4.2. Both parties agree that the site may be suitable for a tall building, defined as above 75m AOD and therefore should be included within the identified City Cluster tall buildings area.

5. Agreed proposed changes (if any)

- 5.1. Subject to additional strategic views and heritage impact assessments, some very minor adjustments of the proposed City Cluster contour lines could be made to the Policies Map at this location.

6. Matters on which parties disagree

Topic/matter	City of London Corporation	SEA Holdings
Contours over 33 Old Broad Street	The maximum contours at 33 Old Broad Street demonstrate an appropriate height to be achieved at this location, taking into account the possibility of harm to the relevant Strategic Landmarks, in this case St Paul's Cathedral. A change to the maximum contours would not be appropriate but some potential minor changes to the positioning of the contour lines across the site could be agreed. Any minor refinements to the contour lines would be subject to additional strategic views and heritage impact assessments.	There is potential for additional massing within the maximum contours at 33 Old Broad Street, without causing additional potential harm to relevant Strategic Landmarks.

Signed on behalf of City of London Corporation:

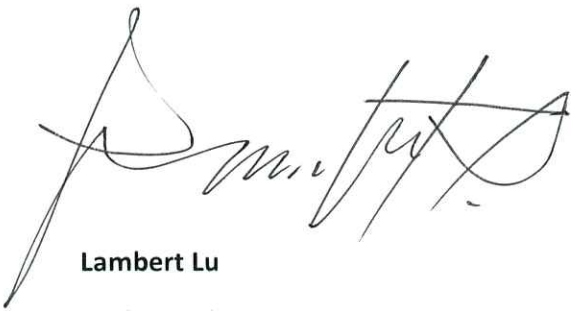


Rob McNicol

Assistant Director – Planning Policy & Strategy

City of London Corporation

Signed on behalf of SEA Profit Holdings Limited:



Lambert Lu

Authorised Signature

SEA Profit Holdings Limited