

**Statement of Common Ground (SoCG) between
City of London Corporation and Brookfield Properties**

In relation to 30 Fenchurch Street

4 December 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 Brookfield Properties.

3. Comments received at Regulation 20

- 3.1. Brookfield Properties submitted their response to the Regulation 19 City Plan on 6 May 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
R0119/C0002	Chapter 11 Heritage & Tall Buildings	The contour lines proposed on site restrict the ability to use the existing structure and the ability to add sufficient office floorspace to make a retrofit or redevelopment viable.
R0120/Appendix	Chapter 11 Heritage & Tall Buildings	Revisions to the interpretation of the contour rings to favour the higher height to optimise the cluster's volume.

4. Matters on which parties agree

- 4.1. Both parties agree on the importance of celebrating the City's rich and diverse heritage.

- 4.2. Both parties agree that the approach to identified tall building clusters is appropriate to meet identified development requirements.
- 4.3. Both parties agree on the approach to identifying appropriate locations for tall buildings using three-dimensional computer models to inform and depict suitable building heights.
- 4.4. Both parties agree that the evidence submitted in the Brookfield R19 representation suggests that the contours at 30 Fenchurch Street could be refined to reflect further site-specific evidence demonstrating how some additional height and changes to the contour lines over this site may be acceptable, subject to additional strategic views and heritage impact assessments. In the main this is because the site is situated in the lee of 20 Fenchurch Street, concealed by it from St Paul's and set well apart from the WHS.

5. Agreed proposed changes (if any)

- 5.1. Subject to additional strategic views and heritage impact assessments, an adjustment of the proposed City Cluster contour lines could be made to the Policies Map.

6. Matters on which parties disagree

Topic/matter	City of London Corporation	Brookfield Properties
Interpretation and use of the 2D Policies Map	The tall buildings contours are as identified on the Policies Map and the 3D model is illustrative. The wording 'maximum permissible' is appropriate, demonstrating that proposals should not exceed the relevant contour rings. 'Successfully mediate' is also appropriate wording demonstrating how the areas between contours should respond to them.	Please refer to our representations to the Regulation 19 Publication City Plan (paragraphs 1.10 to 1.14 of the Townscape Consultancy response) which sets out our position on this matter.
180m-160 contour lines over the site	The submitted SVIA illustrates that this height range of 160m to 180m would be likely to be excessive for this site and bring the heights of the centre of the Cluster too far towards the edge. However, it is recognised by CoLC that some increase in heights of the contours over the site may be feasible, subject to further HIA and SVIA.	Please refer to our representations to the Regulation 19 Publication City Plan (paragraphs 1.15 to 1.23 of the Townscape Consultancy response) which sets out our position on this matter.

City of London Corporation



Name:

Rob McNicol - Assistant Director Planning Policy & Strategy

Brookfield Properties



Name & Title:

Dan Scanlon, President