

Statement of Common Ground (SoCG) between

City of London Corporation and AXA IM

in relation to 63 St Mary Axe

24 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 AXA Real Estate Investment Managers UK Limited (AXA IM).

3. Comments received at Regulation 20

- 3.1. AXA IM 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), with specific reference to Camomile Court, 63 St Mary Axe.
- 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
R0161/C0006	Chapter 11 Heritage & Tall Buildings	63 St Mary Axe has potential to deliver significant uplift through tall building. Support principle of the contour rings in Figure15 but have comments on the wording and the heights of the contours that relate to the site.
R0161/C0007	Chapter 11 Heritage & Tall Buildings	SVIA undertaken to inform S12 shaped by hard constraints. Qualitative criteria include impacts of setting of local heritage assets, impacts on townscape and future baseline of consented schemes. City plan should offer a clear description of how these have influenced the 2D contours in policies map C.

R0161/C0008	Chapter 11 Heritage & Tall Buildings	Volumetric testing has informed the contour rings which cross site are in response to LVMF 10A.1 or view C1. Effect of the step out at Pan Pacific Hotel is to include all of the existing silhouette of the Pan Pacific from LVMF 10A.1, but not explicitly marked to account for development in foreground of the Pan Pacific causing confusion.
R0161/C0009	Chapter 11 Heritage & Tall Buildings	Should provide clarifications to demonstrate how approach can be applied to individual sites with complex contour ring relationships such as 63 St Mary Axe.
R0161/C0010	Chapter 11 Heritage & Tall Buildings	The text mentions the mediation between the contours and where overlaps occur the lower height should be applied to the development that sits outside the contour ring; the higher height should be applied to the development that sits inside.
R0161/C0011	Chapter 11 Heritage & Tall Buildings	This is considered too complicated and could be simpler with a 'range' approach.. At 63 St Mary Axe because there are overlapping contour rings at 120 to 180m AOD, development that sits outside the contour ring is subject to the lower height of 120m AOD should 'mediate' between 120m and 100m AOD. But interpretation is that site lies across areas identified to mediate between 100m and 240m.

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.
- 4.3. Both parties agree that the evidence submitted in the AXA IM R19 representation suggests that the site at Camomile Court, 63 St Mary Axe sits within the contours of 100m AOD and 240m AOD. Development of the site has potential to be delivered within the scope of these contours. Any elements which exceed these contours would need to provide strategic views and heritage impact assessments evidence minimising the possibility of harm to the relevant Strategic Landmarks.

5. Agreed proposed changes (if any)

6. Matters on which parties disagree

Topic/matter	City of London Corporation	AXA IM
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	The policy wording would benefit from some additional clarity, given the complexity of the contour ring approach. Specifically, greater clarity on how the policy sets maximum

	<p>exceed the relevant contour rings.</p> <p>'Successfully mediate' is also appropriate wording demonstrating how the areas between contours should respond to them. This approach is considered appropriate and therefore a 'range' of heights is not required.</p>	<p>heights 'directly below a contour ring', distinct from 'in areas between contour rings' should be provided.</p> <p>A range of heights could provide a simpler and less prescriptive way to apply the policy.</p>
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Signed on behalf of City of London Corporation:



Rob McNicol

Assistant Director – Planning Policy & Strategy

City of London Corporation

Signed on behalf of AXA IM:



Rob Samuel

Head of Development UK

AXA Real Estate Investment Managers UK Ltd