

**Statement of Common Ground 19 Addendum (SoCG) between  
City of London Corporation and Bluebutton Properties UK Limited in relation to Broadwalk House  
02 June 2025**

**Chapter 11 Heritage and Tall Buildings**

**1. Purpose of the Statement of Common Ground Addendum**

- 1.1. On the 25<sup>th</sup> November 2024 the City Corporation and Bluebutton Properties UK Limited agreed a Statement of Common Ground (SOC19).
- 1.2. SOCG19 set out how agreement had been reached with respect to the approach to identify permissible heights, and that the evidence submitted in the R19 representation by Bluebutton Properties UK Limited suggested that the site of Broadwalk House and the adjacent Network Rail signal box could be identified as a site that would potentially be appropriate for a tall building and that changes to the Policies Map and Figure 14 of the City Plan could be made to reflect this, subject to further heritage and strategic views impact assessment.
- 1.3. This purpose of this addendum to SOCG19 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 Bluebutton Properties UK Limited.

**3. Further discussions and amendments to the proposed form**

- 3.1. The illustrative massing shown in the Regulation 19 response by British Land (R0167) shows two distinct taller forms, one up to 173.3m AOD (building form A) and a smaller, shorter part rising to 137.8m AOD (building form B), with a valley between the two at 80.4m AOD.
- 3.2. The City Corporation undertook an initial consideration of the potential impacts of these forms in strategic views and on the key strategic landmarks of St Paul's Cathedral and the Tower of London World Heritage Site. This initial consideration led to amendments to the form that has subsequently been assessed in the Strategic Views Impact Assessment addendum (ED-HTB36). The tested form is similar in overall shape to that proposed by Bluebutton Properties UK but with the maximum heights set at 160m AOD and 120m AOD for the two taller parts of the form, and a central valley of between 75m AOD and 80m AOD. These amendments are to ensure that any building of the heights proposed would not be seen in the relevant views above the embrasures of the Tower of London's White Tower; would ensure that the informal cluster (of which a tall building on this site would form a part) would not be seen to expand to the west when viewed from the River Prospects; and that the 'valley' of the building would sit below the line of St Paul's Cathedral's south transept in the Westminster Pier view.

- 3.3. Both parties agree with the conclusions of the SVIA addendum (ED-HTB36) in relation to this site that the tested form would satisfactorily minimise the possibility of harm to the three Strategic Landmarks. Both parties also agree that this site has the potential to make a meaningful contribution to the capacity of the City's office floorspace.
- 3.4. Similar testing of strategic views has been undertaken independently by Miller Hare on behalf of BlueButton Properties UK Limited. This work demonstrates the potential for a taller building at this location without having significant impact or introducing additional new effects on strategic protected landmarks. This testing verifies in more detail the findings and conclusions found by the City Corporation in the SVIA addendum (ED-HTB36).

#### **4. Further discussions following the publication of the SVIA and contour lines for the site**

- 4.1. Both parties have continued discussions regarding the contour lines and how these can best be presented to achieve clarity within the City Plan.
- 4.2. Both parties agree that the illustration of the contour lines in Policies Map E (LD31 – revised policies maps) could be further amended to remove the 75m annotation in red font that sits at the bottom of the two taller elements of the massing. This would bring it in line with the other two contour maps, which only show the upper number where the contours meet the edge of the tall building area. Both parties agree that this would not alter the effect of the relevant policy or the policies map in any way but may helpfully ensure any misinterpretation is avoided. The City Corporation intends to table this as an Additional Modification to the City Plan. See Appendix A for the further revisions.
- 4.3. Both parties agree that the illustration of the heights in the contours for the valley section have not been designed to result in a particular built form or shape for this aspect of any scheme that comes forward on the site. Setting a maximum height of between 75m and 80m has been informed primarily by the need to ensure that the form sits comfortably below the south transept of St Paul's Cathedral in the view from Westminster Pier (8A.1). The height of this element will be informed by a range of factors, including the view of the Cathedral.



**Rob McNicol**

Assistant Director – Planning Policy & Strategy

City of London Corporation

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

**Michael Meadows**

Authorised signatory

For and on behalf of Bluebutton Properties UK Limited