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From: James O'Brien [REDACTED]
Sent: 05 February 2026 07:47
To: Planning Policy Consultations
Cc: silkstreetcampaign@gmail.com
Subject: City Plan 2040 – Representation OBJECTING to Main Modification MM55 (Tall Buildings outside identified areas)

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Dear Planning Policy Consultation Team,

Re: City Plan 2040 – Proposed Main Modifications consultation

Main Modification referenced: MM55 (tall buildings – redevelopment of existing tall buildings outside identified tall building areas)

I am writing to make a representation **objecting** to MM55 as drafted.

I live in [REDACTED] and my flat **faces onto** [REDACTED]. A policy change which weakens the plan-led approach to tall buildings in this area is therefore of direct relevance to my residential amenity and to the character and townscape of the Barbican/Golden Lane neighbourhood.

1) MM55 undermines the plan-led tall buildings strategy

MM55 introduces an exemption/route by which a site **outside the identified tall building areas** could be treated as appropriate for tall-building redevelopment **simply because a tall building exists on the site today** (including where the current “tall building” status may be driven by rooftop plant). This risks turning an existing-condition fact into an effective principle, weakening the clarity and integrity of the Plan's spatial strategy for tall buildings.

A plan-led tall buildings strategy should identify *suitable locations* through evidence and mapping, not permit suitability to be inferred from a legacy height threshold.

2) Risk of “height creep” and cumulative impacts

As drafted, MM55 does not include a clear control to prevent incremental increases in height, bulk and massing when an existing tall building is redeveloped outside the identified tall building areas. Over successive applications this creates a foreseeable “**height creep**” dynamic, with cumulative effects that can be severe in sensitive residential contexts.

For residents in the Barbican and along Silk Street, the practical risks include (individually and cumulatively):

- loss of **daylight and sunlight** and a more oppressive townscape;
- **wind and microclimate** impacts at street level and within the estate;
- increased **noise** and late-night activity associated with intensified development;
- greater **overlooking** and loss of privacy;
- erosion of the established skyline and setting of nearby heritage assets and views.

3) Reduced policy certainty and internal inconsistency

The Plan’s tall buildings approach is intended to provide certainty: tall buildings are focused in identified areas, and outside those areas proposals are expected to be strongly constrained due to heritage, views and townscape sensitivity.

MM55 blurs that clarity and invites argument at application stage (“the site already has a tall building, therefore it’s appropriate”), which will make policy application less consistent and less effective. The likely effect is that residents’ and decision-makers’ ability to rely on the Plan to resist inappropriate tall buildings outside identified areas is weakened.

4) Not sufficiently justified by evidence

If the intention is to enable refurbishment/retrofit or appropriate redevelopment of existing tall buildings, MM55 goes much further than necessary. It effectively opens the door to **additional height and intensification** outside identified areas without:

- a clearly articulated purpose limited to retrofit outcomes;
- a clear evidence basis demonstrating that such locations are suitable for tall-building redevelopment beyond the existing envelope; or
- safeguards to avoid cumulative harm in sensitive residential neighbourhoods.

Requested outcome

I ask that **MM55 be removed**.

If the Inspectors consider some policy wording is needed to address existing tall buildings outside identified areas, MM55 should be **substantially rewritten** so it does **not** create any presumption in favour of tall buildings outside the mapped areas and includes explicit safeguards. For example, MM55 should be limited to something along these lines:

- Redevelopment of an existing tall building site outside identified tall building areas should be **exceptional**, and must not be treated as appropriate in principle simply because the existing building exceeds the tall building threshold (including where this is due to rooftop plant).
- Any proposal should, as a starting point, be constrained to the **existing height/envelope excluding plant**, with any exceedance requiring a clearly evidenced, overriding public interest case and demonstrating no unacceptable impact on residential amenity, townscape, heritage assets, views, and cumulative effects (including wind/microclimate and daylight/sunlight).

Thank you for considering my representation.

Yours faithfully,

James O'Brien

