

Stennett, Jasmine

From: Roger Pavitt [REDACTED]
Sent: 05 February 2026 09:29
To: Planning Policy Consultations
Cc: Roger Pavitt - Google [REDACTED]
Subject: Subject: City Plan 2040 – Objection to Main Modification MM55

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Dear Planning Policy Consultation Team,

Re: City Plan 2040 – Proposed Main Modifications Consultation

Main Modification: MM55 (Tall buildings – redevelopment outside identified tall building areas)

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

I am a resident of [REDACTED] with my flat facing [REDACTED]. A policy change that weakens the plan-led approach to tall buildings in this location is therefore of direct relevance to my residential amenity and to the character and townscape of the Barbican/Golden Lane area.

MM55 undermines the Plan's spatial strategy for tall buildings.

It introduces a route by which sites **outside identified tall building areas** could be treated as suitable for tall building redevelopment simply because a tall building already exists on the site, including where height is driven by rooftop plant. This converts a legacy condition into a policy principle and weakens the clarity and integrity of a plan-led approach. Suitability for tall buildings should be determined through evidence and designation, not inferred from existing height.

MM55 enables height creep and cumulative impacts.

As drafted, the modification does not include clear safeguards to prevent incremental increases in height, bulk or massing when existing tall buildings outside identified areas are redeveloped. Over time this creates a foreseeable risk of cumulative harm, including loss of daylight and sunlight, increased enclosure and townscape harm, adverse wind and microclimate effects, increased noise and overlooking, and erosion of the established skyline and the setting of nearby heritage assets.

MM55 reduces policy certainty and consistency.

The City Plan's tall buildings strategy is intended to provide clarity and certainty by focusing tall buildings within identified areas and applying strong constraints elsewhere. MM55 blurs this distinction and invites argument at application stage, weakening the ability of residents and decision-makers to rely on the Plan to resist inappropriate tall building development outside designated areas.

MM55 is not sufficiently justified by evidence.

If the intention is to facilitate refurbishment or retrofit of existing tall buildings, the wording goes significantly further than necessary and enables additional height and intensification without a clear purpose, a supporting evidence base, or adequate safeguards for sensitive residential contexts.

Requested outcome

I respectfully request that **MM55 be removed.**

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

“Where an existing tall building is located outside the identified tall building areas, its presence will not in itself be taken to indicate that tall building redevelopment is appropriate.

Redevelopment proposals must not result in any increase in height, bulk or massing beyond the existing built envelope and must demonstrate that impacts on residential amenity, townscape, heritage assets, strategic views and microclimate are avoided or reduced.

There will be no presumption in favour of tall buildings outside the identified tall building areas, and proposals will be assessed in accordance with the Plan’s spatial strategy and relevant development management policies.

Applicants should demonstrate that refurbishment, retrofit or re-use within the existing envelope has been fully considered before redevelopment is pursued.”

**Yours faithfully,
Roger Pavitt**

Roger Pavitt

