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To: Planning Policy Consultations
Subject: MM55

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Dear Planning Policy Consultation Team,

Re: City Plan 2040 – Proposed Main Modifications Consultation Main Modification MM55: Tall buildings – redevelopment of existing tall buildings outside identified tall building areas

I am writing to object to Main Modification MM55 as currently drafted.

I live in [REDACTED] within the [REDACTED], and the proposed policy change is therefore of direct relevance to my residential amenity and the character of the surrounding townscape.

1. MM55 undermines the plan-led tall buildings strategy

MM55 introduces a route by which redevelopment of a site outside the identified tall building areas may be treated as appropriate for tall buildings simply because a tall building exists on the site today. This includes circumstances where the current “tall building” status is driven wholly or partly by rooftop plant.

This approach risks converting an existing condition into an effective policy principle. It undermines the clarity and integrity of the City Plan's spatial strategy, which is intended to identify suitable locations for tall buildings through evidence-based mapping and plan-making, rather than through legacy height thresholds.

A genuinely plan-led approach should not permit suitability for tall buildings to be inferred retrospectively from the presence of an existing structure, particularly where that structure predates the current Plan.

2. Risk of height creep and cumulative impacts

As drafted, MM55 does not include any clear safeguard to prevent incremental increases in height, bulk or massing when an existing tall building is redeveloped outside identified tall building areas.

This creates a foreseeable “height creep” dynamic: successive redevelopments may each argue marginal increases are acceptable, leading over time to significant cumulative impacts in sensitive residential environments.

For residents of the Barbican Estate and along Silk Street, these risks include, both individually and cumulatively:

- loss of daylight and sunlight and an increasingly oppressive townscape;

- adverse wind and microclimate effects at street level and within the estate;
- increased noise and activity associated with intensified development;
- greater overlooking and loss of privacy;
- erosion of the established skyline and the setting of nearby heritage assets and views.

3. Reduced policy certainty and internal inconsistency

The Plan's tall buildings strategy is intended to provide certainty: tall buildings are directed to identified areas, and proposals outside those areas are expected to be strongly constrained due to townscape sensitivity, heritage considerations and protected views.

MM55 blurs this clarity and invites argument at application stage that a site is appropriate "in principle" because it already contains a tall building. This weakens policy certainty, reduces consistency in decision-making, and diminishes the ability of residents and decision-makers to rely on the Plan to resist inappropriate tall buildings outside identified areas.

4. Insufficient justification and over-reach

If the intention of MM55 is to enable refurbishment, retrofit or sensitive renewal of existing tall buildings, the wording goes significantly further than necessary.

As drafted, MM55 effectively opens the door to additional height and intensification outside identified tall building areas without:

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

5. Harm to heritage significance and the Barbican townscape

The Barbican Estate is a nationally significant designated heritage asset, whose significance derives not only from the architectural quality of individual buildings but from the coherence of the estate as a planned ensemble, its carefully controlled skyline, and the deliberate relationship between height, massing, open space and movement.

The City Plan's plan-led approach to tall buildings is particularly important in this context. MM55 risks undermining that approach by weakening the spatial distinction between areas identified as suitable for tall buildings and those that are not, thereby increasing the likelihood of inappropriate tall building redevelopment affecting the setting, appreciation and legibility of the Barbican and its surrounding townscape.

By allowing redevelopment of existing tall buildings outside identified tall building areas to be treated as potentially appropriate in principle, MM55 introduces a policy mechanism that could incrementally erode the established skyline and spatial composition that underpin the Barbican's heritage significance. This would conflict with the requirement to give great weight to the conservation of designated heritage assets and their settings, and to avoid incremental harm which may individually appear limited but cumulatively results in substantial heritage and townscape damage.

In this context, the presence of an existing tall building cannot reasonably be treated as evidence that further tall building redevelopment or intensification would preserve or enhance heritage significance. Rather, the sensitivity of the Barbican Estate reinforces the need for a clear, restrictive and genuinely plan-led approach.

6. Inconsistency with national plan-led policy

MM55 risks undermining the primacy of the development plan by shifting decisions about tall building suitability from plan-making to application-stage argument. Allowing suitability to be inferred from an existing condition weakens the role of spatial strategy and reduces the effectiveness of the Plan as a decision-making tool.

This approach increases uncertainty, encourages speculative proposals, and conflicts with the principle that strategic development choices — particularly for tall buildings — should be made through the Plan itself.

7. Failure to apply a precautionary approach in sensitive residential contexts

Tall buildings can have disproportionate and often irreversible impacts on townscape, heritage settings, microclimate and residential amenity. In sensitive locations such as the Barbican and Golden Lane, policy should therefore apply a precautionary and restrictive approach.

MM55 instead lowers the policy threshold for redevelopment outside identified tall building areas without adequate justification, safeguards or limits, exposing established residential communities to avoidable risk and uncertainty.

Requested outcome

I ask that MM55 be removed.

If the Inspectors consider that some policy wording is required to address existing tall buildings outside identified 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 should be limited to wording along the following 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 solely 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 and envelope (excluding plant). Any exceedance should require a clearly evidenced overriding public interest justification and must demonstrate no unacceptable impact on residential amenity, townscape, heritage assets, protected views, or cumulative effects, including wind and microclimate and daylight and sunlight.’

Taken together, these concerns indicate that MM55 is not justified, not effective, and risks undermining the coherence and credibility of the City Plan’s tall buildings strategy.

Thank you for considering my representation.

Yours faithfully,

Helen Lincoln



Sent from my iPhone