

**Stennett, Jasmine**

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**From:** Helen Fairfoul [REDACTED]  
**Sent:** 05 February 2026 23:50  
**To:** Planning Policy Consultations  
**Subject:** City Plan 2040 change MM55

**Follow Up Flag:** Follow up  
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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 making a representation objecting to MM55 as drafted.

I regard it as unacceptable that such a significant modification to the Plan be proposed at this very late stage and without the benefit of consultation.

I live in the [REDACTED] and a policy change which weakens the plan-led approach to tall buildings across the City and specifically in the area in which I live is directly relevant 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 significantly weakens the clarity and integrity of the Plan’s intended strategy for tall buildings.

As in the draft Plan without this amendment we should have a clear tall buildings strategy that identifies suitable locations through evidence and mapping. MM55 will open the door to taller buildings scattered all over the City by enabling suitability to be inferred anywhere simply from the presence of a single building with a legacy height threshold.

2) Risk of “height creep” and cumulative impacts

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. This presents a risk over successive applications of a “height creep”, with cumulative effects that could be severe in sensitive residential contexts.

As a resident in the [REDACTED] I can already see the practical risks from such scenarios with the 1 Silk Street proposals, including:

loss of daylight and sunlight and a more oppressive townscape; wind and microclimate impacts at street level; 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 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 will be weakened.

### 4) Amending the Plan further than can be justified

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

My representation is that MM55 be removed.

If it is considered necessary to have some policy wording to address existing tall buildings outside identified areas, MM55 should be substantially rewritten. It should not create any presumption in favour of tall buildings outside the mapped areas and should be clear that proposals for redevelopment of an existing tall building site outside identified tall building areas should be exceptional.

Proposals should also be constrained to the existing height/envelope, excluding plant, with anything beyond this requiring a clearly evidenced, overriding public interest case and demonstrating no unacceptable impact on residential amenity, townscape, heritage assets and views.

Thank you for considering my representation.

Yours faithfully,  
Helen Fairfoul

Sent from my iPhone