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Sent: 05 February 2026 22:10
To: Planning Policy Consultations
Cc: Jan-Marc Petroschka; Randall Anderson
Subject: Response to City Plan modifications consultation from Barbican Association
Attachments: BA Response to City Plan 2024 Consultation on Main Modifications January final.docx

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Dear Sir/Madam

Please find the response to this consultation from the Barbican Association.

Best wishes

Jane

Jane Smith

chair, BA planning subcommittee



Representing the interests of Barbican Residents

Response to City Plan 2024 Consultation on Main Modifications January/February 2026

From Barbican Association

The Barbican Association has responded to all iterations of this City Plan and made representations to and attended the Inspector's Examination.

We are pleased to respond to this final stage. Our main concerns all along have been the protection and enhancement of residential amenity in this densely packed City and the protection of its 20th Century heritage, notably the Barbican Estate.

Not many changes have been made to the plan as a result of the examination. Some are welcome tweaks in the right direction. There are one or two that are detrimental to residential amenity and the protection of our local heritage, and we seek to have them reconsidered.

We are not clear how some of the Major Modifications have arisen because they did not seem to be discussed during the Examination hearings, and we are puzzled too by how some of them make the plan sounder or more effective (eg MM4 and MM9).

General points

Housing

As a community organization within the Barbican and Golden Lane Neighbourhood Area, we share the Neighbourhood Forum's disappointment at the lack of

- a) site allocations for housing and in particular
- b) the explicit recognition of the need for specialist older person housing in the City (as set out in the Forum's Housing Needs Assessment).

We therefore support the request for an addition to Policy S3 (2) (c) to read:

“providing an appropriate mix of affordable tenures, addressing identified need in the City of London, including social or London affordable rented housing, **specialist older person housing**, and where appropriate intermediate housing (living rent, shared ownership or other genuinely affordable products) for rent or sale.”

Residential amenity

Policies that affect residential amenity are dispersed around the many policies in the plan (as well as HS3 being explicitly about residential amenity). During the Examination

hearings it was pointed out that there were inconsistencies on the description of adverse effects on residential amenity, in that sometimes the description “adverse” was qualified by the word “unacceptable” but that most times it was not. The Barbican Association requested that the word unacceptable should be removed – that “adverse” was clear enough as a description.

Policy CV4(2) on hotels now has a major modification (MM22) which has added the qualifier “unacceptable” to what was a reasonable and acceptable policy. It now reads: “Proposals of for hotels and other visitor accommodation will be permitted where they... “Do not result in **unacceptable** adverse impacts on the amenity of neighbouring occupiers, including cumulative impacts;”

We request that the word “unacceptable” is not added to CV4(2).

This change weakens the protections of residential amenity in the original plan. It is not clear how it makes the plan more effective; Qualifying “adverse” by the word “unacceptable” would in fact make the policy more imprecise for decision-makers. It also undermines policies HS3 (residential amenity) and HL3 (Noise: “should ensure that operational noise does not **adversely** affect noise-sensitive land uses such as housing...”) that protect residential amenity. Policy HS6 (1e) on student accommodation has similar wording without the addition of “unacceptable”: “They will only be permitted where...e. They would not have an adverse impact on the residential amenity of the area.”

We are not objecting to hotels but they can have adverse impacts through deliveries, terrace bars, parking, noise, rooftop plant. These all need to be fully mitigated to prevent avoidable conflict. The addition of “unacceptable” allows developers to provide lower mitigations to adverse impacts that could be properly mitigated and so prevented altogether.

Residential amenity has so many challenges in this dense economic area that the protections in City Plan 2040 should be clear. We question how this modification addresses an issue of soundness.

We would like the removal of “unacceptable” and the original wording reinstated. “Adverse” is a clear description of harm to residential amenity and qualifying undermines the intent to “protect” residential amenity (as set out in HS3), not to gently degrade it.

DE7(1) relates to daylight and sunlight – a key aspect of residential amenity. We note that AM57 has added churchyards to sensitive areas, but we seek a further change, which we believe will make the plan more effective and sound.

For the avoidance of doubt, we seek the addition of a sentence recognising that the cumulative loss of daylight and sunlight to people’s homes will also be taken into account. This recognises that residents often live in their homes for a much longer

period than the lifespan of an average office block and therefore aligns this policy with policy HS3(4).

DE7(1) Development proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings and other sensitive receptors including schools, hospitals, hotels and hostels, places of worship and open spaces including churchyards, is appropriate for its context and provides acceptable standards of daylight and sunlight, taking account of the Building Research Establishment's guidelines. **The cumulative loss of daylight and sunlight to homes will also be taken into account.**

Heritage and Tall buildings

The current plan identifies three areas for tall buildings (the City (eastern) Cluster, Fleet Valley, and (added as a major modification) Broadgate). This was done to align with the London Plan, to ensure that tall buildings (over 75m AOD) were confined to specific areas within the City.

At this late stage the plan has introduced a completely new paragraph (in MM55) that seems to potentially to undermine the policy of clustering tall buildings. This reads:

“On sites that contain a tall building (both within and outside the tall building areas identified in Figure 14), the existence of a tall building is likely to be a material consideration in the determination of development proposals. The retrofit or redevelopment of sites with existing tall buildings outside of the tall building areas may therefore be considered appropriate, where demonstrated that they would meet the requirements of Policy S12 (8), (9) and (10) in relation to their impacts and design, and other relevant development plan policies.”

It is indisputable that there are individual tall buildings (over 75m) throughout the City, outside the three designated areas, that have been there for some time. Indeed, the three Barbican towers fit that description – though it should be noted that they were carefully curated as part of an urban neighbourhood and set off the lower-level buildings rather than intrude upon them.

As worded, however, the proposed MM55 creates the risk that existing tall buildings may be replaced by even taller ones and serve as an excuse for generally raising the height in the neighbourhood of these tall building “outliers”. That seems to us to be entirely against both the letter and the spirit of the London Mayor’s requirement for tall building areas to be defined.

The issue could be remedied: and we ask that the sentence is amended as follows (the struck-out clauses are unnecessary and the emboldened text is necessary to stop the development of additional tall buildings outside the tall buildings areas):

*“On sites that contain a tall building ~~(both within and outside the tall building areas identified in Figure 14)~~, **the existence of a tall building is likely to be a material consideration in the determination of development proposals.** the retrofit or*

redevelopment of a tall building ~~sites with existing tall buildings outside of the tall building areas~~ may be ~~therefore be considered~~ appropriate, where **the development is not significantly taller than the existing building and it is** demonstrated that it would meet the requirements of Policy S12 (8), (9) and (10) in relation to their impacts and design, and other relevant development plan policies.

AM71 could become a Main Modification since it covers similar ground and could apply everywhere.

It currently reads

“S12 (5) 5. The suitability of sites for tall buildings within the identified areas will depend on the sensitivity of the relevant context to such proposals. Their ~~and their~~ design, height, scale and massing should ensure that they ~~take into consideration~~ local preserve and enhance the significance of heritage assets and take into consideration other ~~localised~~ factors relating to townscape character and microclimate.”

The words “within the identified areas” should be removed, given the thrust and wording on the new paragraph proposed in MM55.

Given that tall buildings are such a significant feature of the City of London, and City Plan 2040, it is crucial that the definition of “scale” given in the National Design Guide is put into the City Plan 2040 glossary, for the avoidance of doubt, to read

Scale

“Scale is the height, width and length of each building proposed within a development in relation to its surroundings. This relates both to the overall size and massing of individual buildings and spaces in relation to their surroundings, and to the scale of their parts. It affects how a space can be used and how it is experienced.”

Urban Heat Island Effect

The effect of hotter summers on residential amenity in the City of London has made mitigation of the urban heat island effect a new and important issue for its residents. The City’s own LEAP report makes the point that overheating is a more serious issue than under heating, yet the plan does little to address this problem.

We do not think that the modifications made actually improve matters -though we suspect that they were intended to.

The changes to MM59 read:

Buildings and the public realm must be designed to be adaptable to future climate conditions and resilient to more frequent extreme weather events.

1. Development must minimise the risk of overheating ~~and any adverse contribution to the urban heat island effect;~~
2. Development must mitigate the impacts of the urban heat island effect;

We appreciate making the comment about the urban heat island effect a separate point, but it has lost some of its force in the move.

2 should read

2 Development must avoid contributing to the urban heat island effect in the wider environment and minimize the impacts of the urban heat island effect

Comments on some specific modifications

(in some cases we have adopted the comments of the Barbican and Golden Lane Neighbourhood Forum)

Main Modifications

MM1	Reworded Vision statement	As a result of BA and Forum representations, this now includes reference to people who live here, <u>but</u> it; <ul style="list-style-type: none"> - Does not seek to protect heritage (only celebrate it) - Does not seek to improve the health of people (only to create a healthy environment)
MM4	Air Quality	Policy HL2(1). Adds a reference to the SPD and air quality neutral assessment. <i>This is not a change at all – it simply adds a summary of what the SPD says, which is for air quality neutral impact – not a requirement to improve air quality.</i>
MM20 and 21	Culture	We oppose the change to MM21 to make cultural provision off site in large developments “not acceptable” We agree with the Forum (and others) that the insistence on large developments having local cultural provision in that building is short sighted and counterproductive to the aim of supporting cultural activity in the City. We are surrounded by cultural institutions and activities – which often need additional funding – funding by developers may be better used to support existing facilities or be pooled to create something really world class. <u>Given that the City is about to produce a Cultural SPD, the addition of (MM21) “Not acceptable” for provision off site for large developments has an absoluteness that virtually nothing else in this plan shows.</u> <u>We suggest “Not usually acceptable, unless contributions to an existing/emerging cultural facility would clearly provide more benefit than on site provision”.</u>
MM22	Culture and visitors	We object to this modification. See comments above.

MM 55	Heritage and tall buildings	We request changes to this modification – see above (also AM71).
MM59	Climate resilience	See comment above and suggested rewording.
MM64 &MM 65	Smithfield and Barbican KAOC	We support this change.

Additional Modifications

AM4	Economic objective	<p><i>This is a procedural point that should be drawn to the attention of the inspectors.</i></p> <p><i>This clarifies that the minimum of 1.2 million sqm referred to throughout the original draft plan is NIA and equates to 1.6 million GIA) net additional office floorspace.</i></p> <p><i>Though being precise is good, the entire consultation was run on the understanding that everyone was talking about 1.2m sqm, not 1.6sqm.</i></p>
AM7, 8 & 9	Air Quality	<p>Although the City’s Vision is to create a “healthy environment” (MM1 above), the text has been changed to show a reduced commitment to air quality.</p> <p>Removing the WHO target for PM2.5 particulates and extending the deadline for reaching the NO2 target by 5 years.</p> <p>See Forum comments.</p>
AM17	HL9	Should include “housing” as a sensitive use – for the avoidance of doubt – in “The impact on sensitive uses such as housing , education, health, leisure or community facilities, places of worship, publicly accessible open space including churchyards, hot food take away shops, betting shops and in areas where air pollution and noise issues are particularly prevalent should be taken into consideration.”
AM 23 & 24	Amenity	HS3 – small tweak to amenity policy to make it clear, requested by the BA and accepted by the City.
AM 31	Culture	<p>The BA welcomes the use of the term “cultural infrastructure” to recognise that places where culture is produced are as important as places where it is consumed – as described in AM31 (and reflected in AM30).</p> <p>However, we are dismayed by the introduction of the concept of “cultural contributors” and want to challenge this late and major change as an additional modification.</p> <p>It was not discussed at the Examination.</p>

		<p>The problem is that the definition is so wide as to be meaningless – and includes places/activities that have their own policies. It includes “restaurants, bars, clubs, public houses, retail areas and tourism facilities...”</p> <p><i>Wideness:</i> what is the justification of not including transport facilities (to bring people to culture), health facilities (in case concert goers become ill), educational facilities (to help them appreciate the cultural facilities or contribute to them)?</p> <p>If the concept of cultural contributors is to have any meaning it should be confined to cafes/bars/restaurants/bookshops that cultural spaces might develop to support their own work.</p> <p><i>Covered elsewhere in the plan:</i> “leisure, recreation, and visitor facilities” have their own policies and resisting the removal of them (AM32 and 35) is covered by other policies in this plan.</p> <p>AM33 and 36 – Changing the title of policies CV1 and CV2 is not trivial. It shifts policies about culture to ones that are also about recreation and visitors. Yet CV3 is all about visitor facilities. It was coherent before -it is incoherent now and undermines an understandable categorisation of different sorts of activities.</p> <p>The same applies to the similar wording changes in this chapter.</p>
AM57	Daylight/sunlight	<p>The BA and the Forum asked for policy DE7(1) to be strengthened.</p> <p>We would like to see the <u>cumulative loss</u> of daylight/sunlight to people’s homes to be taken into consideration.</p>
AM63	Servicing - impact	<p>The Forum made representations about the impact of servicing on residential areas. Text (not policy) changed to recognise this.</p>
AM71	S12(5)	<p>See comments above.</p>
AM76	Views SPD	<p>A new one will be done.</p>
AM 87, 88, 89	Temple	<p>There are only small changes here.</p> <p>However, the BA and Forum continue to maintain that the special status of The Inner and Middle Temple as “a mix of workspaces, residential, commercial and communal uses” is equally applicable to the Barbican and Golden Lane – and that if the Temple’s “mix of uses</p>

		contributes to the historic interest and high environmental quality of the area and should be maintained” that is applicable, too.
AM95 – AM 98	Smithfield and Barbican KAO	The BA and the Forum made representations, which are reflected in the changed text.
AM 105	City Landmarks	Barbican Towers and Great Arthur House have been added to the list, which we support
Proposed AM	Glossary	<p>The Forum/BA suggested that the Plan, when it referred to the scale and massing of a building, should also refer to its height (particularly as that is relevant to the tall building definition and areas). The suggestion was not incorporated in the plan.</p> <p>As an alternative the Forum/BA proposed that the definition of “scale” given in the National Design Guide” could usefully be included in the glossary – for the avoidance of doubt – ie</p> <p>26 “Scale is the height, width and length of each building proposed within a development in relation to its surroundings. This relates both to the overall size and massing of individual buildings and spaces in relation to their surroundings, and to the scale of their parts. It affects how a space can be used and how it is experienced.”</p>

5 February 2026