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Sent: 06 February 2026 13:12
To: Planning Policy Consultations
Subject: Change MM55 to City Plan 2040

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Dear Planning Policy Consultation Team,

City Plan 2040 - Proposed Main Modifications Consultation - MM55

I am writing to formally object to MM55 as drafted. I consider it renders the Plan unsound, as it is not justified by proportionate evidence and is ineffective in delivering a consistent, plan-led spatial strategy.

I am a resident of Cromwell Tower, with my flat facing Silk Street. A policy change weakening the plan-led approach to tall buildings directly affects my residential amenity and the character, townscape, and Grade II listed setting of the Barbican and Golden Lane Estates.

Key Objections

1. **Undermines plan-led strategy**

MM55 allows sites outside identified tall building areas to be treated as suitable for tall-building redevelopment solely because a tall building exists there today. This converts a legacy condition into a principle, weakening the spatial strategy that should be based on evidence and mapping.

2. **Height creep and heritage impacts**

Without robust controls, MM55 risks incremental increases in height and massing over successive redevelopments, causing:

- Harm to the skyline and setting of the Barbican and Golden Lane Estates.
- Loss of daylight/sunlight and oppressive townscape.
- Adverse wind and microclimate impacts.

- Inconsistency in protecting heritage assets and views.
3. **Reduced policy certainty**
MM55 blurs the clear distinction between identified and non-identified tall building areas, inviting “argument by precedent” and weakening the Plan’s effectiveness in guiding appropriate development.
4. **Conflict with “Retrofit First” and lack of evidence**
MM55 incentivises demolition and taller redevelopment, disincentivising genuine retrofit. It lacks:
- Evidence demonstrating suitability for increased volume.
 - Clear purpose limited to retrofit or public-interest outcomes.
 - Safeguards to prevent cumulative harm in sensitive residential areas.

Requested Outcome

I request that MM55 be removed.

If policy is required to address existing tall buildings, it should:

- Treat redevelopment outside identified areas as exceptional, not justified by existing height.
- Be height-neutral (constrained to existing envelope, excluding plant).
- Require any exceedance to have a clearly evidenced public-interest justification and heritage-first impact assessment, ensuring no harm to the Barbican/Golden Lane Estates or protected views.

Thank you for considering my representation.

Kind regards,

