

**Stennett, Jasmine**

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**From:** Karl clowry [REDACTED]  
**Sent:** 06 February 2026 14:18  
**To:** Planning Policy Consultations  
**Subject:** Objection to MM55 – City Plan 2040 Proposed Main Modifications

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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 write as a long-term local resident of Cromwell Tower (A-side), with direct East facing frontage towards Silk Street, to object to MM55 as currently drafted.

The proposed modification is of direct and material relevance to my residential amenity and to the character, townscape and heritage setting of the Barbican and Golden Lane neighbourhood. I am particularly concerned that MM55 materially weakens the clarity and integrity of the Plan's spatial strategy for tall buildings, and is patently a late attempt to try to expand the area for development of "tall buildings" in the City departing from a long standing approach that residents have relied upon.

#### 1. MM55 Undermines the Plan-Led Tall Buildings Strategy

The City Plan 2040 adopts a spatially defined, plan-led approach to tall buildings, identifying specific locations where such development is considered appropriate, and by implication identifying areas where it is not.

MM55 introduces a route by which redevelopment of a site outside identified tall building areas may be treated as appropriate in principle simply because a tall building currently exists on that site. In some cases, "tall building" status may derive in part from rooftop plant rather than from an intentionally designed built form.

This approach risks converting an existing condition into a policy justification. It substitutes legacy height for evidence-based spatial planning. That fundamentally weakens the discipline of a mapped tall buildings strategy.

If suitability for tall building redevelopment can be inferred from the presence of an existing tall building — regardless of how or why that height arose — then the spatial strategy ceases to be genuinely plan-led and becomes reactive.

A robust plan-led approach requires that suitable locations be identified through evidence (heritage

capacity, townscape analysis, daylight and sunlight modelling, wind and microclimate assessment, strategic views testing). It should not permit suitability to be inferred from historic accident or plant height.

## 2. Risk of Height Creep and Cumulative Impacts

MM55, as drafted, contains no explicit control preventing incremental increases in height, bulk and massing when existing tall buildings outside identified areas are redeveloped.

In practice, redevelopment applications rarely replicate an existing envelope exactly. Commercial pressures incentivise increases in floorspace and intensification. Without explicit safeguards, the foreseeable outcome is progressive “height creep”.

Over successive redevelopment cycles, even modest increases can generate severe cumulative impacts, particularly in sensitive residential and heritage contexts such as the Barbican and Golden Lane estates, and the Barbican Arts Centre.

For residents along Silk Street and within the Barbican, the risks are concrete and measurable:

- Loss of daylight and sunlight, and a more oppressive sense of enclosure;
  - Adverse wind and microclimate impacts at street level and within podium and courtyard spaces;
  - Increased noise, servicing, and late-night activity associated with intensified office or mixed use development;
  - Greater overlooking and loss of privacy;
  - Erosion of established skyline composition and harm to the setting of designated heritage assets and protected views.
- An evident potential breach by the City of London as our landlord to ensure quiet enjoyment of our leasehold interests which would be undermined by such a policy being driven by senior planning officers, wholly at variance with the City’s unavoidable contractual duties to its tenants, who will be reluctantly forced to injunction the City from adopting or deployment such policies in its planning function, at a cost to the City ultimately even if tenants have to expend some money to ensure their quiet enjoyment is preserved.

Cumulative impact is especially critical. The harm may not arise from a single proposal but from a pattern of incremental increases enabled by policy ambiguity.

MM55 currently provides no mechanism to prevent this.

## 3. Reduced Policy Certainty and Internal Inconsistency

One of the primary purposes of the tall buildings strategy is to provide clarity and certainty — for residents, applicants, and decision-makers.

Outside identified tall building areas, proposals are expected to be strongly constrained due to:

- heritage sensitivity,

- townscape character,
- strategic and local views,
- residential amenity considerations.

MM55 blurs this clarity. It invites argument at application stage that a site is “appropriate in principle” because it already hosts a tall building.

This weakens the ability of decision-makers to rely on the Plan when resisting inappropriate proposals. It also undermines residents’ legitimate expectation that mapped spatial designations provide meaningful protection.

A policy that introduces ambiguity at the level of principle will inevitably shift conflict to the development management stage, increasing uncertainty and reducing the effectiveness of the Plan.

#### 4. Lack of Clear Justification or Safeguards

If the intention behind MM55 is to enable retrofit, refurbishment, or decarbonisation of existing tall buildings, the current drafting goes significantly further than necessary.

As written, MM55 appears to:

- create an implied presumption that redevelopment may be appropriate;
- allow potential exceedance of the existing envelope;
- allows developers to extrapolate a small elements of an existing tall building to an unlimited height and massing, (a particular lacuna that appears to be driven by such a deployment at 1 Silk Street which may seek to place a tower or equally massing structure to their current proposal soon to be substituted)
- provide no clear evidence-based justification for intensification outside mapped tall building areas; and
- omit explicit safeguards against cumulative harm.

There is no clearly articulated evidence base demonstrating that sites outside identified tall building areas are suitable for intensified tall building redevelopment beyond their existing envelope.

In a sensitive residential and heritage context, such a policy relaxation requires compelling justification and explicit controls. Those are absent.

#### Requested Outcome

I respectfully request that MM55 be removed in its current form.

If the Inspectors consider that policy wording is required to address existing tall buildings outside identified areas, it must be substantially rewritten to avoid creating any presumption in favour of tall

buildings outside the mapped strategy and to include explicit safeguards.

At minimum, the modification should:

- Make clear that the existence of a tall building on a site does not establish suitability in principle for redevelopment as a tall building;
- Constrain redevelopment to the existing built envelope (excluding rooftop plant) as a starting point;
- Require any exceedance in height, bulk or massing to demonstrate a clearly evidenced, overriding public interest case;
- Require robust assessment of cumulative impacts, including daylight/sunlight, wind and microclimate, heritage setting, views, and residential amenity and ensure that any extant tall-building element can not be utilised to facilitate a much taller and more massive structure via this policy which is likely restrainable in the context of the Coty as landlord seeking to cut across its non-a R o gable duties to ensure quite enjoyment by its tenants of their properties, which is likely contravening this duty let alone if it were to be adopted and invoked in any planning application.

Without such safeguards, MM55 materially weakens the plan-led tall buildings strategy and risks long-term harm to the character and amenity of the Barbican and Golden Lane neighbourhood.

Thank you for considering my objecting representation.

Yours faithfully,

