

Stennett, Jasmine

From: Frank Davidson [REDACTED]
Sent: 06 February 2026 18:21
To: Planning Policy Consultations
Subject: City Plan 2040 - Objection to Main Modification No. 55

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Dear Sir / Madam

**City Plan 2040 Consultation
Objection to Main Modification No. 55 to London City Plan 2040**

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.

I am writing to object to the proposed insertion of a new paragraph, referenced above (after 11.5.12), in Chapter 11 *Heritage and Tall Buildings* that has been proposed as Main Modification No.55.

My specific objections:

1. **Impacts the Tall Building Cluster Policy.** This paragraph gives a presumption in favour of Tall Building development on sites that lie outside of the designated areas in the City Plan 2040 for Tall Buildings. This will create unnecessary confusion in the planning policy concerning scale and location and undermines the designated area status for Tall Buildings. This would also undermine the Mayor of London's Plan that promotes clustering over scattering of Tall Buildings.
2. **Rewards Past Planning Mistakes.** By making an existing tall building a 'material consideration', this will reward past planning mistakes by allowing new and oversized structures based on the presence of an existing building that might have been consented and built under much weaker heritage or environmental standards.
3. **No Height Limit.** Unlike the current Tall Building cluster policy with its proposed graduated height

limits, this paragraph would allow for Tall Buildings in a non-designated area without any height limit. Therefore, this will inevitably be interpreted as an opportunity to push for maximum site exploitation. Developers will regard the existing building height as a floor not a ceiling when bringing forward development proposals.

4. **Conservation and Heritage Impact.** Many existing tall buildings outside designated areas are adjacent to sensitive conservation and historic areas. This proposed paragraph therefore risks permanently imposing harmful impacts on the setting of highly valued heritage assets thereby compromising the more traditional scale and character of City neighbourhoods.

5. **Subjective Not Objective.** The phrasing "may therefore be considered appropriate" is far too subjective and discretionary. This is unfortunate as inevitably developers will always favour height increases on sites rather than alternative development solutions that promote public realm, resident amenity and heritage safeguarding. This paragraph will restrict opportunities for more appropriate development in scale, form and function on these sites.

Quite simply, this paragraph is far too loaded and favourable to developers who will exploit it to maximise development gain over the rights and interests of other legitimate stakeholders in the planning process.

I therefore **object** to its insertion into City Plan 2040 for adoption.

Yours faithfully

Frank Davidson RIBA

