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From: Sue Pearson [REDACTED]
Sent: 06 February 2026 18:26
To: Planning Policy Consultations
Cc: Secretary Glera
Subject: Response to draft City Plan 2040
Attachments: GLERA response to City Plan_Feb2026_v2.pdf

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Pease find attached the Golden Lane Estate Residents' Association response to your consultation on the 2040 City Plan
Can you please acknowledge receipt.

Kind regards
Sue Pearson
Chair GLERA 2025 26

Sent from my iPhone

GOLDEN LANE ESTATE RESIDENTS' ASSOCIATION

6 February 2026

GLERA Response to City Plan 2040

GLERA, the Golden Lane Estate Residents' Association, is the Recognised Tenants' Association representing all residents on Golden Lane Estate. Its aim is to further the common community interests of all its residents and represent members in dealings with the City of London Corporation, and any other bodies pursuant to those community interests.

In response to the consultation document we note that significant and far-reaching changes being made at the eleventh hour. It is unclear the extent to which these really represent issues of soundness or legality. Diverging further from the elected Mayor of London's Plan does not make the City Plan more sound (especially regarding the clustering of Tall Buildings in identified areas, and Agent of Change on Hotels) and we believe that heritage protections are being lost in the balance.

We would like to see the inclusion of specialist older person housing in MM8.

Although the City's Vision now includes reference to people who live in the City there is no reference to it seeking to protect heritage or improving the health of people living or working here.

Finally the plan needs to be clear about amenity. The City is the most densely developed part of the UK – it needs to be consistent in ensuring that residents and commerce can happily co-exist.

In more detail:

- 1. We object to Tall Buildings (over 75m AOD) outside the clusters** - Main Modification 55 (MM55). An unwelcome last-minute change which seriously undermines the London-wide policy to cluster tall towers together. The City is already given broad latitude under the elected Mayor of London's Plan to
 - a) define what "Tall" means locally, and
 - b) to identify exactly where new building above this height is appropriate and allowable.

Despite this permissive framework, MM55 shows that the City is intent on defying the broad intent to curate the skyline for the benefit of all Londoners, in favour of a loophole for developers seeking to redevelop big buildings outside the clusters. The 2036 draft City Plan had to be abandoned because it did not limit and contain tall towers sufficiently to satisfy the Mayor of London. This eleventh-hour change to City Plan 2040 appears to be a return to the former attempts to allow tall towers where they are not suitable, simply because of what is on the site now, by adding this paragraph into Chapter 11 Heritage and Tall Buildings. We would prefer to see this Modification deleted in its entirety.

If it is to stay, the inherent problems with this approach need to be addressed:

- a) Some existing buildings fall into the Tall Building category simply by having a plant room or similar on the roof – an existing building cannot be classified as “Tall” based on completely uninhabitable structures on the roof.
- b) The whole paragraph is only about existing tall buildings outside the tall buildings area so there is no need to say “both within and outside”; the speculation about material planning consideration is contentious and should be removed.
- c) outside the clusters, the redevelopment of existing “Tall” buildings should not be significantly taller than the current building – both to encourage sustainable retrofit, and to respect the planners’ assessment of where, and where not, tall towers are acceptable.
- d) Policy S2 (5) must apply to all areas, and must be referred to in MM55.

Our preferred wording for City Plan 2040 proposed paragraph 11.5.13 is: *“On sites that already contain a tall building (outside the tall building areas identified Figure 14). Retrofit or redevelopment of sites with existing tall buildings outside of the tall building areas may be considered appropriate, provided the development is not significantly taller than the existing building and it is demonstrated that it would meet the requirements of Policy S12 (5), (8), (9) and (10) in relation to their impacts and design, and other relevant development plan policies”.*

If the City is seeking to approve Tall Buildings outside the clusters, Policy S12 (5) must also be reworded to apply to Tall Buildings outside clusters (AM71):

“5. The suitability of sites for tall buildings 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.”

2. We object to watering down of protections for neighbours of new hotels (MM22). We recognise that the City could do with more hotels, and that they can usefully come about by retrofitting older offices stranded by the rush to move into tall towers. We think that hotels can happily sit alongside existing housing, but only if the incoming development protects against adverse impacts on the amenity of the neighbours who were there first (Agent of Change).

Unaccountably, MM22 proposes to weaken the draft City Plan 2040’s protections by only applying them if “adverse impacts” are “unacceptable”. We object to this muddled addition; either an impact is adverse or it is not. Qualifying it simply invites hotel developers to do less than is necessary to avoid noise and nuisance. We know these adverse impacts can be “designed-out” in a way which is both effective and cost-efficient, as befits a densely-occupied world-class city, but only if the requirement is clear. We therefore propose that “unacceptable” is deleted.

3. Include Older Person Housing (MM8). The Barbican and Golden Lane Neighbourhood Forum gave evidence to the City and the Plan Inspectors of Housing Need by independent specialists using appropriate methodology, proved that there is “identified need” for specialist older persons housing in the City. Given this, which is clearly demonstrated on Golden Lane Estate, we believe it would be appropriate to include “specialist older person housing” 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.”*