

Stennett, Jasmine

From: Susan Cox [REDACTED]
Sent: 05 February 2026 13:31
To: Planning Policy Consultations
Subject: Comments on proposed modifications to the City Plan 2040

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Dear Sir/Madam

Comments on proposed modifications to the City Plan 2040

We are writing to object principally to:

Main Modification 55 (MM55) which has been proposed (but by whom?) as part of the final inspection changes to City Plan 2040. We consider this to be a significant and unjustified weakening of established policy at this very late stage in the plan-making process.

MM55 would introduce an exception to the strategic requirement, set out in the London Plan, that tall buildings (over 75 metres) should be located within three clearly defined clusters in the City (the City/Eastern cluster, Fleet Valley/Holborn and Broadgate). In policy terms, this represents a material weakening of the tall buildings strategy and is inconsistent with the intent of the London Plan's clustering approach, the purpose of which is to manage cumulative impacts on townscape, heritage assets, microclimate, daylight and sunlight, and residential amenity. MM55 undermines this approach by allowing tall-building redevelopment in locations that have not been assessed or designated as suitable for such development.

We also object to the definition of a "tall building" to include uninhabitable rooftop installations. Counting plant and servicing equipment toward height thresholds distorts the intent of tall-building policy and should not be used to justify further intensification. The proposed modification would effectively create a loophole that would undermine the principle of clustering tall buildings and risks enabling major new tall developments in locations where they were never intended. In these circumstances, MM55 could enable significant increases in scale and massing on sites outside of the defined tall building clusters without proper strategic justification or cumulative impact assessment.

Given the advanced stage of the plan process and the fact that no new matters should be introduced at this final stage, we do not consider it appropriate to introduce a modification that alters the spatial application of tall-building policy in this way. MM55 should therefore be removed, and the existing clustering policy retained without exception.

We would also like to object to the following proposed amendments:

Main Modification 8 (MM8) – given the growing requirement for such facilities, housing for Older Persons should be added to the wording of this policy

Main Modification 22 (MM22) – the suggested addition of the word "unacceptable" to the policy in our view actually makes it more imprecise and therefore waters down the requirement to protect residential amenity

Main Modifications 59-63 (MM 59 - 63) – the creation of urban heat islands should clearly be minimised given that overheating in the City is already a growing problem. We feel that the modifications suggested (the creation of two separate clauses) actually serve to weaken rather than strengthen the policy

We thank you for your attention to this matter and would request that our comments will be taken into consideration.

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Yours faithfully,

Peter and Susan Cox

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