

**Felgate, Gavin**

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**From:** Jane Smith [REDACTED]  
**Sent:** 17 June 2024 16:25  
**To:** Planning Policy Consultations  
**Subject:** Barbican Association Response to City Plan 2040  
**Attachments:** Part 1 Representation.docx; Response Barbican Association.zip; List of documents.docx

**Categories:** CONFIRMED

THIS IS AN EXTERNAL EMAIL

Dear Planners

I attach the Barbican Association's responses to your Regulation 19 consultation on the City Plan 2040.

I've attached separately part 1 of your response form together with a list of documents that are contained in the attached zip file.

The zip file contains, each in a separate file, as requested, the Barbican Associations' responses to policies. (For ease of managing, each Part B document has a header identifying it as a response from the Barbican Association).

In some cases we have provided evidence within the response, but we have also cited evidence submitted by the Barbican and Golden Lane Neighbourhood Forum in their response. The BA is a founder member of the Forum and we have collaborated on producing some of the evidence, and in many cases our responses are similar.

The BA planning subcommittee members would, of course, be happy to discuss any of our points with you further.

I would be very grateful if you could acknowledge its safe receipt.

Best wishes

Yours sincerely

Jane

Jane Smith

Chair, Barbican Association Planning Subcommittee

## List of documents

Part 1 Barbican Association contact details

Introduction

Strategic priorities

Spatial Strategy

S1 Healthy and inclusive City

HL2 Air quality

HL6 Public toilets

HL7 Sport

HL8 Play areas

S2 Safe

S3 Housing

HS1 Location of new housing

HS3 Residential environment

HS6 Student accommodation

HS7 Older persons housing

S4 Offices

RE3 Specialist retail and clusters

S6 Culture and Visitors

CV2 Provision of Arts, Culture, and Leisure Facilities

CV5 Evening and night time economy

IN1 Infrastructure connections

S8 Design

DE1 Sustainable design

DE2 Design Quality

DE3 Public realm

DE4 Terraces and elevated public spaces

DE7 Daylight and sunlight

DE8 Lighting

DE9 Residential Amenity -**new policy**

VT2 Freight and servicing

S10 Active travel and healthy streets

S11 Historic environment

Figure 12 Designated heritage assets

HE1 Managing change to the historic environment

S12 Tall Buildings

S14 Open Spaces

OS1 Protection open spaces

Figure 17 Open spaces

OS2 Urban Greening

OS3 Biodiversity

OS5 Trees

S15 Climate Resilience

CR1 Overheating and Urban Heat Island Effect

S23 Smithfield and Barbican

S23 Barbican and Golden Lane – **new policy**

## Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input type="text" value="x"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="x"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="x"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Barbican Association (BA) is a founder member of the Barbican and Golden Lane Neighbourhood Forum (B&GLNF), and in many cases our representations are similar to those made by the Forum, particularly relating to the Key Area of Change Smithfield and the Barbican.

The Barbican Association has contributed to the evidence produced by the Forum, and in several cases we rely on its evidence in addition to any we have produced in our responses (and the Forum’s evidence documents are referenced)

We agree with the Forum that the Neighbourhood should be mentioned in the plan and shown on Figure 1 Key diagram. The Neighbourhood has been recognised and a Neighbourhood Plan is in preparation.

We’d like you to note three points about our responses:

1. We agree with the B&GLNF that there needs to be another strategic policy covering the Barbican part of the Smithfield and Barbican KAOC. This would be effective policy because there is a separate strategic policy covering the Smithfield part



of the KAOC, and because the parts are significantly different in character and require different policy responses. Without it, the policy is unsound. We include this new policy in our responses – as S23B. We also support that the Smithfield and Barbican KAOC boundary should be coterminous – in the east of the KAOC - with the Neighbourhood Area boundary, to reduce policy confusion.

2. We remain unclear about how direct contradictions between policies are to be resolved (a comment we made on the first iteration of this plan). We cannot see how heritage can be adequately protected, open and green space enlarged, play and sports areas for visitors provided, climate resilience strengthened, carbon reduced, and housing targets met when there is such a large requirement for new build tall offices. Current experience is that when harms to heritage and open space are being weighed against the “need” for office space, the need for office space always trumps all other policies. It is also not clear whether the target for increased office space in the City has already been met by buildings currently being constructed and consented, or whether that number is actually needed.

In those respects we argue that the plan is unsound.

Finally, the Barbican Association would like to appear before the Planning Inspector at the Examination. The BA represents a substantial proportion of the City’s residential community and wants the opportunity to argue for the changes we have suggested to this long term plan – which will affect the lives of those of us who live in the City for the next 15 and more years. And be able to respond to the representations of others.

The responses, on Part B forms, are contained within the zip file. They are headed as Barbican Association responses.

17 June 2024

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Barbican Association Response to City Plan 2040

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The Barbican Association considers the strategic priorities unsound as they do not mention the specific needs of residents (except to engage them along with others), the quality of their homes, their amenity, and the liveability of the City.

We see that many policies do address these elements, but the lack of a specific mention in these priorities misses an opportunity to recognise this important minority group within the City, which has a particular set of needs not shared by workers or visitors, and which is acknowledged in many of the policies in this plan

Evidence for the needs of residents is provided in the B&GLNF Evidence bundle K *Evidence of Health and Social Need* and in several individual sections of their evidence bundles (eg on noise, air quality, overheating)

Since the spatial strategy refers to existing residential areas as the focus for additional housing, we think reference in the Social Objective is appropriate

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Suggest amend this point

“Delivering additional **high quality** additional homes within the Square Mile and on City Corporation estates and other appropriate sites outside the City”

Add this point

**Support the City’s residential neighbourhoods by protecting residential amenity and ensuring a liveable environment**

(Continue on a separate sheet /expand box if necessary)

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In every other local authority area, the background context is that the local authority is a place where many many people live – and policies have that as a background assumption. That is not the case in the City of London, so residents needs require specific attention

## Barbican Association Response to City Plan 2040

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The Barbican Association considers that  
 The Spatial strategy diagram should show the Barbican and Golden Lane Neighbourhood Area. The Forum and Area were designated on 18 July 2023  
<https://www.cityoflondon.gov.uk/assets/Services-Environment/barbican-and-golden-lane-neighbourhood-forum-area-map.pdf>

Sites for housing are not identified. It is not clear to us from the rest of the Plan how Item 3 can be met.

The green links are ill defined and aspirational and while the intention seems to be to encourage greening along the links (which we would welcome), it is not clear from the rest of the plan how this would necessarily lead to biodiversity corridors or biodiversity net gain

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The Barbican Association considers that all the elements of this policy are necessary to meet the needs of all residential communities (including older people and children) in the City and nearby.

But given the length of the plan, the specifics are not enough to improve the health of residents and others in the City, so it is not effective.

Item 6c should not just emphasise nitrogen dioxide and particulates PM10 and PM2.5 but all pollutants described in the latest WHO guidelines for short and long term air quality. (This could go in HL2)

See B&GLNF evidence K *Evidence of Health and Social Need -Air Quality*

Item 6 e should give force to this policy by adding the installation of automated blinds in windows facing homes, to drop at 7pm (This could do in DE8)

See See B&GLNF evidence I *Lighting Impact Analysis and Case Study*

The policy should also aim to bring environmental noise levels down to 53 dBLden and 45 dBLnight, as recommended by WHO guidelines, starting with residential areas. (this could go in HL3)

See B&GLNF evidence K *Evidence of Health and Social Need -Noise*

See B&GLNF evidence H *Environmental Noise and Health*



And it should include the aim to reduce the Urban health island effect because average summer temperatures are rising

See See B&GLNF evidence E *Overheating and Climate Resilience*

This policy should also support measures to make the City's environment healthier by improving air quality, reducing noise, reducing the urban heat island effects, especially in residential areas and around other sensitive receptors like hospitals and schools

.  
Sub policies HL1, HL4, HL5, HL6, HL9 are all supported  
See separate comments on HL2, HL3, HL6, HL7, HL8

(Continue on a separate sheet /expand box if necessary)

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Item 6c improve local air quality, including all the 1 pollutants described in the latest WHO guidelines for short and long term air quality. (This could go in HL2)

Item 6 e add **Including the installation of automated blinds in windows facing homes, to drop at 7pm** (This could do in DE8)

6 d **Aim to bring environmental noise levels down to 53 dBLden and 45 dBLnight, as recommended by WHO guidelines, starting with residential areas.** (this could go in HL3)

Add a new item

Support measures to make the City's environment healthier by improving air quality, reducing noise, reducing the urban heat island effects, especially in residential areas and around other sensitive receptors like hospitals and schools

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If this policy is challenged by others we want the chance to respond

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The Barbican Association supports much of this policy but considers that it could be made more effective.

The City’s own evidence – the Air Quality SPD (<https://www.cityoflondon.gov.uk/assets/Business/city-of-london-air-quality-spd-2017.pdf>) and Air Quality Strategy (<https://www.cityoflondon.gov.uk/assets/Business/City-of-London-Air-Quality-Strategy-2019-24.pdf>)- recognise that air quality in the City is extremely poor. Moreover, the strategy (written in 2020) aspires to achieve the cleanest possible air, using innovative technologies and the City aspires to be a leading authority in the field of air quality (Air Quality Strategy). For this reason – and given the severity of the problem – we argue that the Policy should be make more effective by including the most comprehensive and highest quality standards.

Please also see B&GLNF Evidence K *Evidence of Health and Social Need – Air Quality*

The SPD on Air quality recommends minimising the use of diesel generators, construction sites should secure temporary power connections to avoid the use of diesel generators and completed buildings should secure an alternative connection or batteries to back up their main supply (3.5 Air Quality SPD)

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Suggest additions to policies as set out in bold

2. Development that would result in a worsening of the City's nitrogen dioxide or PM10 and PM2.5 pollution levels **and other pollutants considered by the UN to harm the natural environment or by WHO to harm human health** will be strongly resisted;

4. Developers will be expected to install non-combustion energy technology. ~~where available;~~

5. A detailed AQIA will be required for combustion based low carbon technologies (e.g. biomass, combined heat and power), and any necessary mitigation must be approved by the City Corporation;

**6. Major development must demonstrate that it is designed to ensure that indoor air quality complies with the latest WHO guidelines for short and long term air quality including particulate matter (PM2.5 and PM10), nitrogen dioxide (NO<sub>2</sub>), carbon monoxide (CO), formaldehyde and volatile organic compounds (VOCs). Carbon dioxide (CO<sub>2</sub>) concentrations in indoor air should also be considered. Compliance with such standards is also encouraged on medium development and substantial refurbishment schemes**

~~7~~6. Developments that include uses that are more vulnerable to air pollution, such as schools, nurseries, medical facilities and residential development, will be refused if the occupants would be exposed to poor air quality. Developments will need to ensure acceptable air quality through appropriate design, layout, landscaping and technological solutions; Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts to the fullest extent possible. Impacts from these activities must be addressed within submitted AQIAs. All developments should comply with the requirements of the London Low Emission Zone for Non Road Mobile Machinery;

~~8~~7. Construction and deconstruction and the transport of construction materials and waste must be carried out in such a way as to minimise air quality impacts to the fullest extent possible **and to at least the standards required in the City's Code of Practice for Deconstruction and Construction**. Impacts from these activities must be addressed within submitted AQIAs. All developments should comply with the requirements of the London Low Emission Zone for Non Road Mobile Machinery; **Compliance with the Code of Practice for Deconstruction and Construction will be a condition to any planning permission.**

~~9~~8. Air intake points should be located away from existing and potential pollution sources (e.g. busy roads and combustion flues). All combustion flues should **be located away from sensitive receptors such as residences and** terminate above the roof height of the tallest part of the development to ensure maximum dispersion of pollutants and be at least 3 metres away from any publicly accessible roof spaces.

**10. Major developments should whenever possible be connected to two separate substations rather than rely on diesel generators for back up power**

**11. Construction sites should secure temporary power connections to avoid the use of diesel generators**

(Continue on a separate sheet /expand box if necessary)

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## Part B – Please use a separate sheet for each representation

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Paragraph	<input type="text"/>	Policy	HL6 Public toilet	Policies Map	<input type="text"/>
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Though not of immediate concern to residents, except to the extent that public urination is not indicative of a healthy and inclusive city, The Barbican Association, supports this policy, particularly Item 2

Provision of publicly accessible toilets in the City is completely inadequate, particularly with the ambitions of Destination City.

Anyone trying to find out about public toilets in the City might google and end up with the City's interactive map – which shows only two actual public toilets. Other toilets are in buildings that are closed (Museum of London), closed much of the time (St Botolphs without Aldersgate), closed at weekends (most of those in Smithfield), or in pubs with questionable access (including tiny steep staircases – eg the Red Lion Eldon Street)

Virtually none are in office blocks, even though many have 24 hour security, and could be provided in line with this policy

See also B&GLNF Evidence J – *Section on Public Toilets*

*(Continue on a separate sheet /expand box if necessary)*

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## Barbican Association Response to City Plan 2040

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The Barbican Association considers that HL7 3 and 4 will not be effective in protecting residential amenity from new outdoor facilities.

3 The provision of new sport and recreation facilities, particularly publicly accessible facilities, will be encouraged in locations which are convenient to the communities they serve. New facilities should provide flexible space to accommodate a range of different uses and users, must be accessible to all, and should not cause undue disturbance to neighbouring occupiers.

4 The use of vacant development sites for a temporary sport or recreational use will be encouraged where appropriate and where this does not preclude return to the original use or other suitable use on redevelopment.

We also agree with the the Barbican and Golden Lane Neighbourhood Forum in questioning

"10.11 ...the City's evidence for a "network" of "free outdoor sporting facilities" created by re-assigning widely used public open space. The evidence of un-met need for sport and recreation in the City is heavily weighted in favour of teens and elderly residents on the City's housing estates, rather than commuting office workers who can afford to make use of the City's many gyms (some even within the office and many with subsidised use of those gyms) and who have access to sports facilities where they live (as do visitors). This policy risks using land to create a narrower benefit to a much smaller group of people than the current land usage and as such, [in this residential



area] would be contrary to the NPPF. New outdoor sporting facilities should be in addition to current open space.

(Continue on a separate sheet /expand box if necessary)

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3.... and should not cause undue disturbance to neighbouring occupiers." Should be replaced by

**“, and should not damage residential amenity or cause nuisance to neighbouring occupiers.”**

4 The use of vacant development sites for a temporary sport or recreational use will be encouraged where appropriate and where this does not preclude return to the original use or other suitable use on redevelopment **or damage residential amenity or cause nuisance to neighbouring occupiers.**

That change recognises the particular sensitivity of the people who live in the City 24 hours/365 days of the year and offers some protection from new outdoor facilities. It also defines “appropriate” for point 4

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

## Barbican Association Response to City Plan 2040

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

If this change is opposed – or the policy is weakened by other representations we would want to make representations

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

## Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input type="text" value="x"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="x"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="x"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Barbican Association considers that this policy is not effective and therefore not sound. Play areas in residential areas are clearly needed - but they can cause substantial noise nuisance close to residences and they need to be well managed

One example is the disturbance caused by skateboarders in residential areas – which developed during lockdown and remains unmanaged.

The concept of closing play areas within residential estates at a certain time in the evening is well established in housing estates throughout the country

Some data from an “Antisocial behaviour reporting tool” run by the Barbican Association – with results reported to the City is below:

Golden Lane Estate has engaged private security to manage noise disturbance from such activities

ACTIVITY	2021-2022	2023	Jan – May 2024	Total by activity
skateboarding	115	27	14	156
parkour	92	57	11	160
Roller skating	6	1	nil	7
Playing football	nil	5	nil	5
TOTAL				328

(Continue on a separate sheet /expand box if necessary)

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**Item 3 Play areas within and adjacent to residential areas need to be well managed with curfew times to protect residential amenity**

(Continue on a separate sheet /expand box if necessary)

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**Yes**, I wish to participate in hearing session(s)

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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

If this proves contentious we would like to argue our case

## Barbican Association Response to City Plan 2040

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Name or Organisation:

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Paragraph  Policy  Policies Map

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The Barbican Association supports Policy S2 – and sub policies SA1-3. Keeping people in the City safe is important and these policies should be effective

(Continue on a separate sheet /expand box if necessary)

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Name or Organisation:

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Paragraph  Policy  Policies Map

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The Barbican Association support the policy of Encouraging new housing development on appropriate sites in or near identified residential areas

We refer to the Housing Needs Assessment prepared by Aecom for the Barbican and Golden Lane Neighbourhood Forum (of which the Barbican Association is a member) and its finding that within the Barbican and Golden Lane Neighbourhood Area there is a need for both affordable private rented dwellings, and specialist accommodation for older people and those with support needs. ([Barbican and Golden Lane Neighbourhood Forum – Localism in the heart of the Square Mile \(wordpress.com\)](#) Scroll to bottom on page to download the report)

We also support the Forum’s proposal that “Housing is encouraged in residential areas particularly if this means the reuse or retrofit of a building rather than its demolition.”

We think the agent of change principle is so important to residential amenity that it should be included in this strategic policy.

This is in conformity with the London Plan D13 (C)

(Continue on a separate sheet /expand box if necessary)

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to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Suggest addition to item 4

Ensuring that other new land uses within identified residential areas are compatible with residential amenity. This is in conformity with the agent of change principle, which is the principle “that the person or organisation responsible for change is responsible for managing the impact of that change. This includes impacts from noise, vibration and lighting. For example, a new residential development near an existing cultural use would be responsible for ensuring that residents are not disturbed by the activities of the cultural use. Similarly, a new cultural use near an existing residential development would need to ensure that existing residents are not disturbed.” [from Glossary definition]

(Continue on a separate sheet /expand box if necessary)

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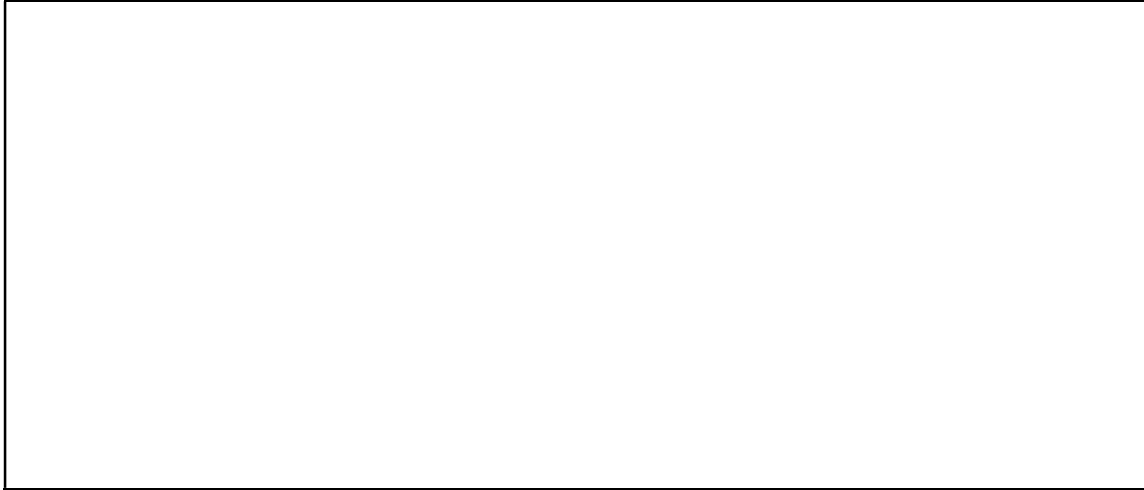
**Yes**, I wish to participate in hearing session(s)

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## Barbican Association Response to City Plan 2040



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## Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	HS1 Location of new housing	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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Please tick as appropriate

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The Barbican Association considers that this policy would be more effective if Policy Item 1c was reworded to:

- a) Reflect the agent of change principle and require no additional noise or disturbance
- b) Include loss of open space as an important part of residential amenity

This is in line with the NPPF  
 "Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed.

See also B&GLNF Evidence C *Open Space in the Barbican and Golden Lane*

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Suggest reword

Item 1c. Result in poor residential amenity within existing and proposed development, including **additional** noise or disturbance (**in line with the agent of change principle**) or **any loss of open and green space**.

(Continue on a separate sheet /expand box if necessary)

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## Part B – Please use a separate sheet for each representation

Name or Organisation:

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Paragraph  Policy  Policies Map

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The Barbican Association wants to see this policy – which it supports – made more effective by further specifying the meaning of “cumulative impact”, adding in mention of the agent of change principle (from para 4.5.2), and adding the requirement for an assessment to ensure that residences are not subject to unacceptable levels of daylight and sunlight.

We are therefore suggesting the addition of a Residential Visual Amenity Assessment, a practical means of ensuring no light pollution, and a full assessment of the effect of development on daylight and sunlight levels. Please see B&GLNF Evidence bundle M *Residential Visual Amenity Assessment*

We also seek an additional item - that requires plant in residential areas, or next to sensitive receptors such as residences, to be located below ground. This makes into policy the substance of para 9.3.7

(Continue on a separate sheet /expand box if necessary)

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Amend the opening text by including wording on the agent of change principle from para 4.5.2

"The amenity of existing residents will be protected by resisting uses that would cause unacceptable disturbance from noise, fumes and smells and vehicle or pedestrian movements **or active daytime or evening uses, in line with the agent of change principle**

Add to item 2

All development proposals must be designed to minimise overlooking and seek to protect the privacy, daylighting and sunlighting levels to adjacent residential accommodation. **Developers should submit a Residential Visual Amenity Threshold (RVAT) assessment as part of applications within or on the boundaries of the City's residential clusters.**

New item [existing words from item 2, but put into its own item and added to]  
Light spill from development that could affect residential areas should be minimised, in line with policy DE8, by installing automated blinds to drop at 7pm;

New item

In order to give effect to the plan's intention to protect daylight in residences, a full assessment is necessary to ensure that the resulting absolute level of daylight is not unacceptably low, even if the relative change falls with the BRE guidelines of acceptability.

This item also gives force to item 3 of this policy on cumulative development. We suggest additional paragraphs of explanation

4.5.X Cumulative impact needs to consider not only separate but coincident developments but also the cumulative impact of successive developments on the same site on residential amenity. The life of City commercial buildings built within the past two-three decades is short –about 25 years. Many residents live in their apartments for longer than that. A existing building may have reduced daylight to the building by say 19%. A new building on the same site that reduces it by another 19% may mean a very detrimental loss of daylight to those occupiers.

4.5.XX Despite the fact that ideal daylight and sunlight conditions may not be practicable in densely developed city centre locations, given the importance of reasonable levels of daylight/sunlight to the health of people living in the City, the impact of changes to daylight and sunlight to residences within the residential clusters will need to be carefully evaluated even if proposals comply with BRE Guidelines on relative loss of light [the guidelines are only guidelines]

We suggest an additional item

4.In or next to residential areas plant should be located below ground (see para 9.3.7)

(Continue on a separate sheet /expand box if necessary)

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To argue the case for better protection for daylight and sunlight levels in residences than the City has previously afforded. Policy rightly states that residences should not be built in parts of the city where the City's primary commercial purpose is dominant. The corollary is that in areas recognised as residential clusters – and suitable for further housing – some additional protection should be afforded to residential amenity.

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## Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	HS6 Student accommodation	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is:

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4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

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The Barbican Association considers that

HS6 – the development of student accommodation should not prejudice the development of permanent residential accommodation – especially the requirements of HS7 – for Older persons housing.

Adding this to the policy would make it align with Spatial Strategy item 3 “Additional housing will be focussed in and around the identified residential areas, with consideration given to student housing in other suitable areas.”

There is a growing need for older persons housing in the City as its residential population grows older. This is supported by the Barbican and Golden Lane Neighbourhood Forum’s Housing Needs Assessment ([Barbican and Golden Lane Neighbourhood Forum – Localism in the heart of the Square Mile \(wordpress.com\)](#) [Scroll to bottom on page to download the report])

Please also clarify: do paras 4.1.5 and 4.16 contradict each other?

(Continue on a separate sheet /expand box if necessary)

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Suggest amend Item 1f (in bold)  
f. They would not involve the loss of permanent residential accommodation **or prejudice the development of permanent residential accommodation in residential areas, particularly, affordable rented accommodation for older people or those with special needs**

(Continue on a separate sheet /expand box if necessary)

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## Barbican Association Response to City Plan 2040

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The Barbican Association supports this policy in principle but think it is not sound because it underestimates the need for new dwellings for older people.

The Housing Needs Assessment done for the Barbican and Golden Lane Neighbourhood Forum (of which the BA is a founder member) says:

1. The 75+ population of the NA is projected to increase by 482 individuals to reach a total of around 877 in 2040. This is a 122% increase doubling the share of the population in this age group.
2. The projected household (as opposed to population) growth is 395 households (based on an average household size in this age group of 1.22).
3. The future need in Barbican and Golden Lane produce a range of 121 to 134 specialist accommodation units that might be required during the Plan period, plus around 31 care home bedspaces.
4. Breaking this overall range down into its component parts, there is slightly higher need for affordable than market specialist housing, and significantly higher need for accommodation with low-level care or adaptations, compared with more intensive extra-care specialist housing (which overlaps to some degree with care home accommodation).

See full report at <https://bglneighbours.wordpress.com/> (scroll down to bottom of page)

(Continue on a separate sheet /expand box if necessary)

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Amend item 2 to read  
Seeking to provide a minimum of **121** net additional dwellings for older persons between 2023 and 2040 (**plus about 31 care home places**) supporting development that meets the specific needs of older people;

(Continue on a separate sheet /expand box if necessary)

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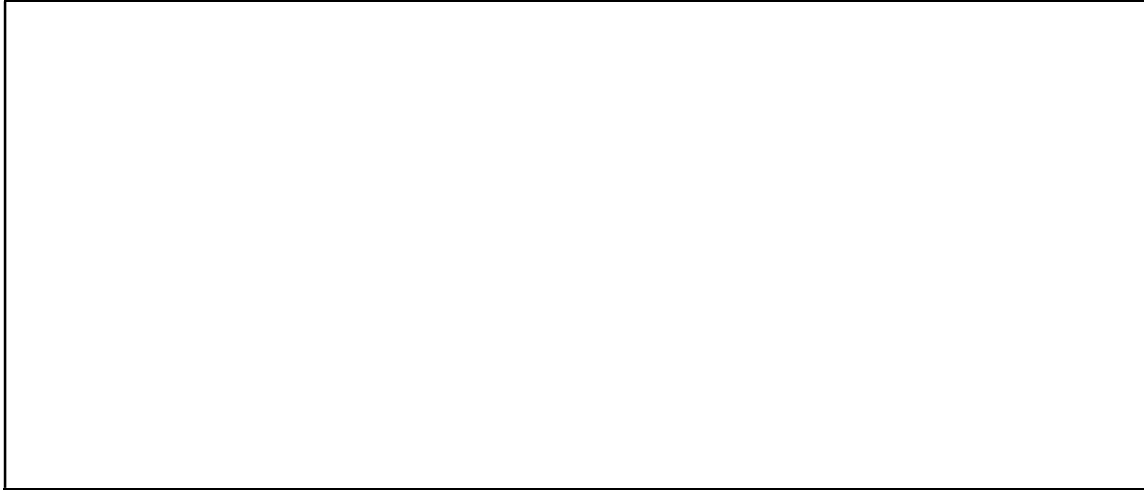
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## Barbican Association Response to City Plan 2040



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Name or Organisation:

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The Barbican Association notes that estimates of office space needed in Central London is hotly contested and asks the City to continue to keep its target of 1.2m sq meters of office space under review, particularly as its projections require a lot of new office space to be built in an area that is already densely packed and has narrow streets, little public realm, and very little green space. It is also not clear how much of the target increase has already started construction or been consented

The City's projections on job growth (to just under 100,00 to 2040) are more than the GLA's (about 80,000 <https://data.london.gov.uk/dataset/long-term-labour-market-projections>)

We are also concerned that a move to new grade A office space will lead to lower grade office space being abandoned – and being unable to be used for housing because of its proximity to other commercial space.

<https://www.cityoflondon.gov.uk/assets/Services-Environment/city-of-london-future-of-office-use-city-plan-2040.pdf>

(Continue on a separate sheet /expand box if necessary)

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## Barbican Association Response to City Plan 2040

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## Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	RE3 specialist and clusters	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

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The Barbican Association thinks a policy item is in the wrong policy

Add item 3 from RE2 here

The loss of convenience retail units located close to, or that meet, a local residential need will be resisted, unless it is demonstrated that they are no longer required.

This wording is currently in RE2 on active frontages. It seems more appropriate in RE3 Specialist Retail uses and clusters. It is backed up by the policy reason 6.4.1 for Policy RE3: "Retail around the Golden Lane and Barbican estates, which play a role in serving the residential communities."

We support this policy and its enhancement of retail that serves the residents of around the Golden Lane and Barbican estates. In particular the shops in Goswell Road that are part of the Golden Lane Estate need support.

See B&GLNF Evidence L *Neighbourhood Shopping Centre Colonnade under Crescent House Aldersgate Stree/Goswell Road (A1)*

(Continue on a separate sheet /expand box if necessary)

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Barbican Association Response to City Plan 2040

to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Switch item 3 from RE2 to RE4. This looks like a mistake

(Continue on a separate sheet /expand box if necessary)

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The Barbican Association make several observations about this policy:

We note that the City does not yet have a current cultural strategy – and badly needs one, given the importance it is laying on enhancing its cultural offer.

It is not clear what “infrastructure” covers in item 4  
 “Providing accessible and inclusive infrastructure and facilities that complement cultural, leisure and recreation uses in the City;”

It is not clear what “cultural placemaking” is in item 5  
 “Placing heritage at the heart of cultural placemaking...”

It is important to distinguish the two types of “night time locations” in para 7.1.1  
 “The Barbican is identified as a strategic night-time location of national or international significance in the London Plan while Cheapside and Liverpool Street are identified as night-time areas of more than local significance in the London Plan”

The Barbican Arts Centre does indeed put on world class performances and programming – and its events usually conclude at 9.45-11pm. Because the Arts Centre building itself is well built and contains its noise within it and visitors are generally well managed, it does not usually adversely affect residential amenity. Liverpool Street, on the other hand, is surrounded by bars and restaurants, and has a very different type of night time economy, lasting in to the early hours of the morning, and it has no residential areas near to it.

The two types of activity should be distinguished, and we therefore suggest an amendment to Item 8 in the policy to protect residential amenity

We support item 6

6. Supporting the development of creative industries and encouraging appropriate workspace and digital infrastructure to facilitate their development;

This is economically important for the sustaining and growth of cultural activities and also provides cultural infrastructure that can be sited near residential uses that may cause less interference with residential amenity than more event-driven uses.

(Continue on a separate sheet /expand box if necessary)

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Amend item 8

Enabling a vibrant evening and night-time economy, especially in areas of night-time activity and around cultural and tourist attractions where public transport such as the night tube and night buses are available, ensuring that users are well-served with safe and convenient night-time transport; **and ensuring that where night time cultural activities take place in a residential areas, they do not damage residential amenity**

(Continue on a separate sheet /expand box if necessary)

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## Barbican Association Response to City Plan 2040

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The pressures on the Barbican Arts Centre to raise funds through commercial activities, including bars and restaurants and late night promoted events are ever increasing – and with them an increase in nuisance. We want to make the case that the delicate balance that currently exists between the Arts Centre and the densely residential estate that surrounds it needs careful nurturing

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The Barbican Association supports the Barbican and Golden Lane Neighbourhood Forum in seeking much stronger policy on prioritising retrofitting over demolition, reducing embodied carbon emissions, and promoting retrofitting. As it says in its response ( sec 9.3 and 9.4), benchmarks for responding to climate change are likely to get tougher over the life of the plan and we support its recommendation of taking an approach like Westminster’s.

The Barbican Association also considers that the policy should be made more effective by including “heat island effect” as one of the environmental deliveries of the design.

See B&GLNF Evidence E and *Overheating and Climate Resilience* and P *Urban Heat Island Effect*.

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Amendment to item 8 – remove words “and emerging” – they contradict the “forms and proportions identified in the character areas study”

Delivers buildings and spaces that have the right scale, massing, built form and layout, with due regard to the existing ~~and emerging~~ urban structure, building types, form and proportions identified in the Character Areas Study;

Suggest add to policy S8 item 13 the following wording (in bold)

13. Optimises microclimatic conditions, addressing solar glare, daylight and sunlight, wind conditions and thermal comfort (**including the urban heat island effect on surrounding area**) and delivers improvements in air quality, **views, a reduction in urban heat, and delivers a net increase of publicly available open space, at ground level and overall**

(Continue on a separate sheet /expand box if necessary)

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## Barbican Association Response to City Plan 2040

The Barbican Association worries that being too hot in the summer is a bigger threat to residents' health and wellbeing than being too cold in winter – as a result of climate change. It is vital therefore that new developments and changes of use do not export heat to the environment.

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The Barbican Association wants to be sure that the urban heat island effect is given prominence – to make the policy of climate resilience effective.

We therefore support this policy, particularly 8 e and 8 g

In relation to 8 g we note that the LAEP proposes the existence of energy networks to share and redistribute waste heat – which will both improve energy efficiency and reduce the emission of waste heat to the environment.

We endorse that this should be a high priority because of the need to reduce the urban heat island effect

Please see B&GLNF evidence document P *Urban Heat Island effect*

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We suggest adding to Item 8  
Ensure that the building does not emit heat to the surrounding area

(Continue on a separate sheet /expand box if necessary)

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We do not think that the City's policies (on open spaces, urban greening, trees, climate resilience) are sound – they are not as effective as they could be in tackling the issue of urban heating.

Urban heating matters hugely to residents – since they live in the City they have no means of escaping its consistently higher temperatures. High temperatures at night are known to be particularly harmful to health and well being.

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The Barbican Association considers that this policy is ineffective in preventing the loss of open space – as required by policy OS

“Item 2 f The development incorporates high quality landscape design and maximises opportunities for greening, biodiversity and public realm improvements;”

High level “gardens” within buildings are no substitute for public realm with greenery and biodiversity at ground level and the loss of ground level open space will be resisted.

Taking over ground level public realm for a development and offering a public access space within a building undermines good design (see The Walkie Talkie, and proposed 1 Undershaft)

See B&GLNF Evidence Bundle J *On Roof Terraces*

Item 5 is supported. Changes to designs as a result of cost savings measures have led to worse design, reduced residential amenity, and breaches of planning policy (eg 21 Moorfields. Late changes in design have led to hostile vehicle mitigation needing to be placed on the public realm, which has in turn undermined a greening project for Moor Lane)

Para 9.3.7 We support plant being placed underground and suggest that this should be a requirement next to sensitive receptors such as residences. Experience with 21 Moorfields and the Jugged Hare show that developments do not always follow the requirement for plant noise to be less than the background level – and placing plant in underused basements would ameliorate this problem.

See B&GLNF Evidence Bundle P *Urban Heat Island Effect* P

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Suggest additional wording.

Item 2 f The development incorporates high quality landscape design and maximises opportunities for greening, biodiversity and public realm improvements; **Such greening biodiversity and public realm improvements should be at ground level. High level gardens will not be considered an adequate substitute for the loss of public realm and greening at ground level**

Item 2 i It avoids unacceptable wind, loss of daylight and sunlight and thermal comfort impacts at street level **and any surrounding sensitive sites such as residences or hospitals** or intrusive solar glare impacts on the surrounding townscape and public realm;

Make para 9.37 into a policy item

(Continue on a separate sheet /expand box if necessary)

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We think this policy will be supported and we want to argue that it is not sound

The City is desperately short of open space and greening. Green roofs and terraces may provide some additional green and SUDs facilities, but they should not be thought to replace existing open space/public realm that could be greened – or to substitute for open/green space at ground level.

Bigger offices bring more people to an area – so they need more space at ground level to walk around in. A high level garden with booking systems and security checks cannot substitute for pedestrian space at ground level. Nor can the greening contribute to biodiversity and green corridors

Arguably it contradicts policy DE3

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Paragraph	<input type="text"/>	Policy	DE3 Public realm	Policies Map	<input type="text"/>
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The Barbican Association supports this policy

Item 5 could be made even more effective by making clear that there is a preference for such green infrastructure at ground level.

The benefits for liveability, well being, and biodiversity are greater if the trees, greening, and planting is at ground level – where pedestrians would walk through on their journeys from A to B and where biodiverse corridors would establish themselves more easily

(Continue on a separate sheet /expand box if necessary)

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Suggest add to item 5

5. The need to increase the provision of green infrastructure, including tree planting, urban greening, soft landscaping and the delivery of net gains in biodiversity, and to link up existing habitats, green spaces and routes to provide green corridors; **there is a preference for such green infrastructure at ground level**

(Continue on a separate sheet /expand box if necessary)

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The Barbican Association proposes changes to the wording of Item 1b to make the policy more effective.  
 Our experience is that roof terraces near residences can cause severe nuisance. It is not only proximity; it is also the way that sound carries at higher elevations and is affected by surrounding buildings and surfaces.

Experience with Moor Place (Wework) on Fore Street showed that terraces close to residences led to severe noise problems and many complaints to environmental health. Environmental Health now recommends conditions that terraces close to residences should not be used between 6pm and 8am on weekdays and close on weekends and bank holidays (See recommendation on 23/01304/FULEIA)

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Suggest

Item 1. Roof terraces will be **considered** where:

Item 1 b add "required" rather than "considered" and add wording in bold:

I b" There would be no immediate overlooking of residential premises, unacceptable disturbance from noise or other significantly adverse impacts on residential amenity. Where there is a potential for a significantly adverse impact, the use of an extensive green roof and a restriction on access should be **required** as an alternative; **in other cases near residences terraces should not be used between 6pm and 8am on weekdays and close at weekends and bank holidays.**

(Continue on a separate sheet / expand box if necessary)

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## Barbican Association Response to City Plan 2040

We anticipate opposition to restrictions on the use of terraces from developers.

Terraces have only really become a phenomenon in the past 10 years or so, and residents have learnt how intrusive noise from them can be. They are also being used as a way of ameliorating (justifying) the loss of space at ground level. We note that environmental health is putting tighter restrictions on terraces than it used to as a result of their experience of the effects of noise.

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The Barbican Association considers that this policy is unsound – it does not effectively protect residences from developments that reduce daylight levels within living rooms to unacceptably low levels.

9.8.2 says “When considering proposed changes to existing lighting levels, the City Corporation will take account of the retained levels of daylight and the cumulative effect of development proposals, and existing levels of light if they are low.”

See also para 9.8.1 – discusses the same problem in relation to open spaces and gives a more defence for open spaces: “Given the importance of the City’s open spaces in a high-density urban environment, the impact of any changes to sunlight on the public realm will need to be carefully evaluated even if proposals comply with BRE guidelines”

We welcome any indication that the BRE guidelines should not necessarily be followed because we find they are often used, by both developers and planning officers to justify reductions to already low levels of daylight.

We argue that residences – which people live in 24 hours a day/365 days of the year -should have the same protection as open spaces – (where people do not spend long continuous periods of time)

Exceptions to the BRE guidelines should be extended to residences too. While the central city environment is acknowledged, any evaluation should take account of the absolute levels of light and not just the relative change. A small loss to

already low levels of daylight can impact mental health. A particular irritant is developer's quoting of the BRE guidance on balconies – which do affect base daylight levels to flats (and flats often have balconies because they contribute to residential amenity). But the existence of balconies should not be allowed to be used as an excuse to get away with reducing daylight levels in flats to very low levels.

See B&GLNF Evidence bundle M *Residential Visual Amenity*

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We suggest amending item 1 of the policy wording as follows:  
! Development proposals will be required to demonstrate that the daylight and sunlight available to nearby dwellings and other sensitive receptors including schools, hospitals, hotels and hostels, places of worship and open spaces, is appropriate for its context and provides acceptable standards of daylight and sunlight. **In cases of residences and other places where individuals dwell t all the time this will require careful evaluation of absolute levels of daylight even if proposals comply with BRE guidelines. Developers should also refer to BRE BR 209 2022 Site Layout for daylight and sunlight: a guide to good practice.**

New item

**In residential areas a residential visual amenity assessment will be required.**

(Continue on a separate sheet /expand box if necessary)

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## Barbican Association Response to City Plan 2040

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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

This change is likely to be opposed. We want the opportunity to make the case for considering absolute levels of daylight and not simply adhering to the BRE guidelines

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## Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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The Barbican Association considers that to make this policy effective, - namely "and protect the amenity of light-sensitive uses such as housing, hospitals, relevant open spaces and community uses." There should be a requirement for automated black out blinds to office windows next to residences.

This is the only sure method of ensuring that residences are not affected by light spill from nearby office buildings. Automated sensor systems either do not work or are not properly maintained and commissioned, and they cannot protect from circumstances where people are working in offices through the night.

Evidence

Meta analysis on effect of light on ecological systems

<https://www.nature.com/articles/s41559-020-01322-x>

Please also see B&GLNF Evidence bundle I *Lighting Impact Analysis and case studies*

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.



Suggest additional item

“Automated blackout blinds should be fitted to office windows next to residences”

(Continue on a separate sheet /expand box if necessary)

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

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**Yes**, I wish to participate in hearing session(s)

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Light pollution is an increasing problem in the City – as buildings get larger, with larger expanses of windows and LED lights provide brighter lighting at less cost.

The City’s Lighting Strategy and charter is very good – but the City has done little to promote it and it is not observed. No one has signed up to the considerate lighting charter

## Barbican Association Response to City Plan 2040

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The Barbican Association supports the Barbican and Golden Lane Neighbourhood Forum in seeking a new policy DE9 – Residential amenity (11.3): The Plan describes residential amenity as “The elements of a location or neighbourhood that contribute to its overall character and the enjoyment of residents.” Design is an important part of that.

(Continue on a separate sheet /expand box if necessary)

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As proposed by the B&GLNF:

**Policy DE9 - Residential Amenity**

1. Development will be required to provide a high quality environment and a good standard of residential amenity for existing and future occupants of land and dwellings. Development which would have an unacceptable adverse impact on the residential amenity of existing or future occupants of land and dwellings will not be allowed.

2. Impact on residential amenity will be assessed to:

i. protect the distinctive character of the existing building(s) and the surrounding area with respect to the design, scale and materials used on the building(s);

ii. protect trees and other soft landscaping of amenity value, providing replacement planting where necessary;

iii. ensure development will maintain a good standard of daylight, sunlight, outlook and privacy for all existing and future occupants of buildings;

iv. avoid the introduction of unacceptable additional accesses, traffic or parking resulting in an increase of visual intrusion, noise or disturbance; and

v. ensure that noise, disturbances, smells, fumes and other harmful effects from surrounding land uses and/or associated operations will not have an unacceptable adverse impact on residential amenity.

(Continue on a separate sheet /expand box if necessary)

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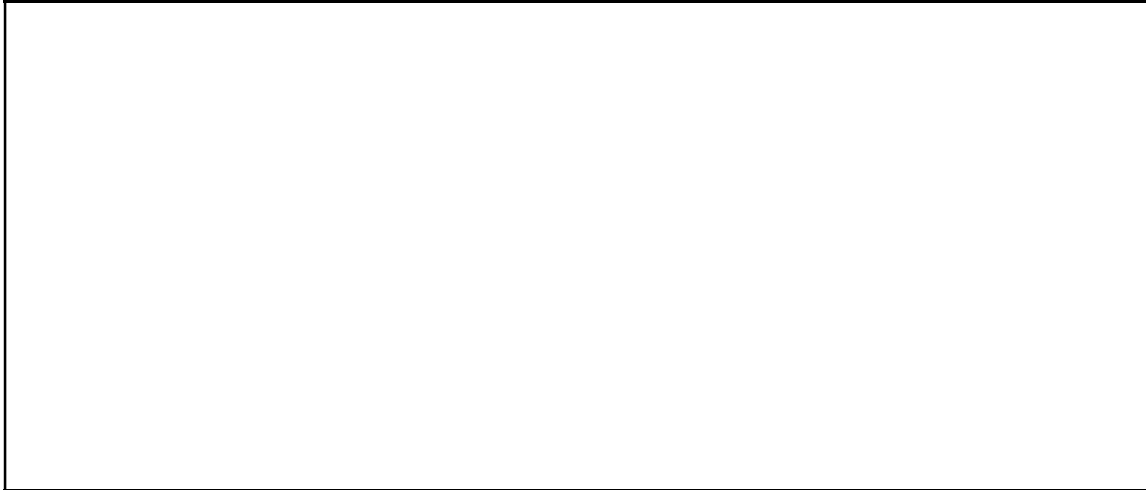
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Barbican Association Response to City Plan 2040



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The Barbican Association supports this policy in general but it needs to be more effective by including a restriction on servicing routes that include streets that are

- Next to residences or
- Designated as TFL cycleways or
- Designated as pedestrian corridors

Evidence for this restriction is needed is given by 21 Moorfields. The original consent included service bays on Fore Street Avenue, away from Moor Lane. A variation was sought for the servicing access route to be via Moor Lane and granted despite the transport officer deeming access in Fore Street Avenue acceptable.

Tenter House has traditionally been serviced from Union Street, with all vehicle accesses made from Moorfields (a short cul de sac with little vehicle activity). The latest consented development allows delivery vehicles to depart via Moor Lane, despite the previous arrangements causing no issues.

Moor Lane is overlooked by the bedrooms of all 148 flats in Willoughby House plus further flats in Heron Tower. Moor Lane is a designated quiet cycleway. Moor Lane has a long delayed outstanding scheme for intensive greening. Moor Lane is also scheduled in the 2040 plan for enhancement as a pedestrian route – see fig 10, fig 11, fig 32 (Smithfield and Barbican Key area of change) and S25 (Liverpool Street key area of change).

Service traffic does not mix well with residential amenity or with streets that are safe and welcoming for walkers and cyclists.

Moreover, because of the restriction of delivery times in residential areas, allowing serving routes in residential areas constrains the servicing of buildings

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We suggest a new item to this policy

7. Streets that are:

- a) Next to residences, or
- b) Designated as cycleways, or
- c) Designated as pedestrian corridors

will not normally be permitted to be used as access routes to or from service bays.

(Continue on a separate sheet /expand box if necessary)

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## Barbican Association Response to City Plan 2040

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The Barbican Association considers this policy to be unsound because there is no mention in the plan on how the restriction on vehicle access will be implemented while "taking account of the needs of disabled people"

The plan as a whole (and the qualities impact statement) assumes that disabled people have wheelchairs or motorised "cycles" and/or blue badges. But some disabled people do not and rely on taxis or lifts from friends/visits from carers. There is provision for limited parking for carers and health professionals visiting people (10.4.1), but it is not clear how those people or blue badge holders get to those parking places through streets where vehicles are restricted.

This issue simply hasn't been thought through

(Continue on a separate sheet /expand box if necessary)

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The Barbican Association, representing the people who live in a grade II\* listed landscape in grade II buildings within a conservation area clearly supports this policy, especially including the preservation of the settings of heritage assets (item 2)

However, despite these policies, we are concerned that the overwhelming emphasis in the Plan on the delivering more office floor space, will in practice undermine the heritage policies, particularly those about protecting and enhancing the setting of listed buildings and conservation areas.

What does item 3 e mean?  
 "encouraging sites adjacent to and near heritage assets to work collaboratively with owners and operators of heritage assets to seek improvements to environmental performance, accessibility or other aspects of the functioning of heritage assets that are challenging to address;"

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If this policy is challenged, we want to argue for it

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Paragraph	<input type="text"/>	Policy	Figure 12 Designated heritage assets	Policies Map	<input type="text"/>
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Figure 12 does not show the buildings of the Barbican – the residential blocks, arts Centre, and Girls school as the grade II listed building that they are. It only shows the grade II\* listed landscape

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Mark Barbican Estate as also listed buildings

(Continue on a separate sheet /expand box if necessary)

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The Barbican Association considers this policy unsound in item 6 because it is not in conformity with Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 which stipulates a duty to pay special attention to the desirability of preserving or enhancing the character or appearance of conservation areas, or Section 16 of the National Planning Policy Framework.

(Continue on a separate sheet /expand box if necessary)

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Suggest

6. Development in conservation areas should preserve, and where possible, enhance and better reveal the character, appearance and significance of the conservation area and its setting. The buildings and features that contribute to the character, appearance, setting or significance of a conservation area should be conserved and opportunities to enhance conservation areas should be **sought and pursued**.

(Continue on a separate sheet /expand box if necessary)

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The Barbican Association supports the zones specified for tall buildings – because they offer some relief to other parts of the City.

But generally the plan is unsound on “tall buildings” because it says nothing about buildings that are tall but happen to fall under 75m AOD.

Much of the City is low to medium rise. Any building that is significantly taller than the prevailing height of an area may have an adverse effect on it (on heritage, townscape, residential amenity)– and may in practice lead to further applications for buildings at the new height, thus over time entirely destroying the character of an area. The buildings that cluster around City Point on Ropemaker Street are such a case (see section on Ropemaker Street in Barbican and Golden Lane Neighbourhood Forum responses -chapter2 p13 on Barbican and Golden Lane Character study

The existing Local Plan CS14 2 makes it clear that tall buildings (defined in this policy as “as those which significantly exceed the height of their general surroundings” 3.1.4.1) should not be sited in conservation areas – and in significant view corridors.

We want the CS14 policy wording reinstated to make it clear that buildings which significantly exceed the height of their general surroundings should be refused in conservation areas

But to make the policy on their environmental effect more effective we suggest an addition to Item 8 d and to 10 j. The Local Area Energy Plan makes clear the large contribution to heat in the environment that is made by waste heat; measures, such as those recommended in the LAEP should be required to reduce the emission of waste heat into the surrounding environment.

<https://democracy.cityoflondon.gov.uk/documents/s190766/Appendix%203%20-%20City%20of%20London%20Local%20Area%20Energy%20Plan.pdf>

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Suggest additions as follows

8 d. the environmental impact on the surrounding buildings and public realm, including daylight and sunlight, solar glare, solar convergence, overshadowing and wind shear, **waste heat**, and the capacity of the City's streets and spaces to accommodate the development. Consideration should be given to how the design of tall buildings can assist with the dispersal of air pollutants;

to item 10 j

mitigate adverse impacts on the microclimate and amenity of the site and surrounding area and avoid the creation of building canyons **and in particular not contribute any waste heat to the environment (to reduce the urban heat island effect)**

(Alternatively this could be added to 8e)

(Continue on a separate sheet /expand box if necessary)

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## Barbican Association Response to City Plan 2040

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

The Barbican Association, representing residents of the City, is particularly concerned about the adverse effects of overheating in Cities

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The Barbican Association supports the intent of this policy but thinks it will be ineffective in remedying the current deficit of both open space and green space in the City.

Even on the City's own assessment of the amount of open space in the City, it is a very small proportion of a densely packed built environment with narrow streets.

So "Protecting existing open and green space"; is important..

The addition of "particularly at ground level" would make the policy even more effective.

And maintaining and increasing accessible space **at ground level (or Highwalk level round the Barbican)** is important.

High level open space, while welcome as an addition for workers and visitors is no substitute for space on the ground for people to walk through and enjoy.

Emphasising the need for ground level space makes the rest of this policy (greening, biodiversity) and others (climate resilience) more achievable

[https://www.gigl.org.uk/GiGLFiles/WebDocuments/City\\_BoroughFactsheet.pdf](https://www.gigl.org.uk/GiGLFiles/WebDocuments/City_BoroughFactsheet.pdf)

<https://www.cityoflondon.gov.uk/assets/Services-Environment/planning-land-use-report-open-spaces-and-recreation-2022.pdf>

Graph 3 shows that just over half the open space in the city is hard surfaces “civic space”, with 18% of the space green. Over half of the Civic space is described as secondary civic space, delivered by the City itself as public realm and characterised by street furniture and landscaping”

The London Plan (3.3.1) says:“..every new development needs to make the most efficient use of land by optimising site capacity. This means ensuring the development’s form is the most appropriate for the site and land uses meet identified needs. *The optimum capacity for a site does not mean the maximum capacity;*[our italics]

Development that maximises the footprint of a building by taking over open space at ground level and supports that with a claim for equal space on terraces and roofs should be resisted.

- a) because the space will inevitably have more restricted access (even if it is only a booking system)
- b) because it will remove ground level open space and make the general environment less pleasant

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Add words in bold to item 1

“Protecting existing open and green space, **especially at ground level (or Highwalk level round the Barbican).**

(Continue on a separate sheet /expand box if necessary)

**Please note** *In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

**After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.**

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

## Barbican Association Response to City Plan 2040

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

To argue the case for more open space in the City

***Please note*** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

## Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	OS1 Protection open spaces	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Barbican Association considers there should be a policy on protecting open spaces because the City has so few but considers it unsound - it should be made more effective

Again it should be strengthened by an emphasis on ground level open space. A city where there are ever taller buildings with less public realm – but plenty of high level terraces – will not be a high quality environment – for anyone- and will not promote walking and wheeling.

It is also unlikely to contribute much to biodiversity and in particular biodiversity corridors

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We suggest

"The quantity, quality and accessibility of public open space will be maintained and improved, **particularly at ground level**

(Continue on a separate sheet /expand box if necessary)

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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Open space (particularly green open space) is so important for residential amenity and to counter the effects of climate change that we wish to argue for it – against those arguing against it

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.



## Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input type="text" value="x"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="x"/>
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Figure 17 is highly misleading and demonstrates a failure, also present in the wording of the Plan, to distinguish between Open space and Green space.

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The figure would be much more effective if the colour green was confined to areas that are genuinely green (ground level or highwalk level spaces with >50% green cover) and another colour was used for ground level open spaces (excluding pavements)

Barbican Association Response to City Plan 2040

(Continue on a separate sheet /expand box if necessary)

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## Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

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The Barbican Association thinks this policy is unsound if it is interpreted as if Urban greening is thought only to mean green walls and roofs.

We think this policy would be more effective if it mentioned mature trees (and densities of canopies) and ground cover as well.

Also, like the Barbican and Golden Lane Neighbourhood Forum we believe that requiring an urban greening factor of only 0.3 is too unambitious a proposal. We note that the London Plan requires a factor of 0.4 for residences. See <https://www.cityoflondon.gov.uk/assets/Services-Environment/planning-draft-local-plan-evidence-urban-greening-factor-study-2018.pdf>. This showed that a factor of 0.3 was easily achievable and affordable  
See also B&GLNF Evidence bundle D *Urban Greening Factor (UGF) Evidence*

Also, for clarity it should be made clear that there should be no reduction in existing UGFs in addition to the requirement for an increase in the UGF. Otherwise requiring a minimum UGF on a site that already has UGF over the minimum might, perversely, lead to a reduction in UGF.

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## Barbican Association Response to City Plan 2040

It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Suggest add

1d Schemes that include the planting of mature trees with dense canopies and/or ground cover will be encouraged

2c Development must not result in any reduction of urban greening

(Continue on a separate sheet /expand box if necessary)

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**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Open space and greening are so important to the liveability of the City

**Please note** the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.

## Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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Please tick as appropriate

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The Barbican Association supports these policies in general but it could be more effective

But

“4.Helping to create green corridors and biodiversity links and utilising roof terraces and gardens as stepping stones to contribute towards a green network; “

While recognising the green roofs can help create biodiversity corridors, high level stepping stones do nothing to create the impression for people in the corridors that they are walking through a green corridor.

This item ignores the pleasantness of the environment for residents, workers, and visitors

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We think item 4 could be made more effective as policy and contribute more to the social and health aspects of the strategy by the addition of the words in bold

“4.Helping to create green corridors and biodiversity links, **where possible by planting at ground level to create the corridors and only** utilising roof terraces and gardens as stepping stones to contribute towards a green network **where this is not possible**;

(Continue on a separate sheet /expand box if necessary)

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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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## Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

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The Barbican Association supports this policy – but thinks it can be made more effective by being more ambitious on the retention of existing trees and in particular the planting of new trees and intensity of tree planting.

Trees help mitigate the urban heat island effect, provide shade for pedestrians, enable biodiversity corridors, and make for a pleasant environment. They also help reduce rainwater run off.

We have been disappointed at recent public realm schemes, which have favoured hard landscaping and raised planting beds over trees, where trees would have been more effective – eg Devonshire Square, and the plans for King Edward Street.

We note the high proportion of City open space that is “Civic space” (<https://www.cityoflondon.gov.uk/assets/Services-Environment/planning-land-use-report-open-spaces-and-recreation-2022.pdf>) – ie hard surfaces - and consider that the Plan should aim to reduce the amount of hard surfaces in favour of more intensive greening

We would like to see this policy made more ambitious, in order to further other strategic policies (eg on climate resilience, air quality, general quality of life).

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need



to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Suggest addition to item 3

"3. Other than in exceptional circumstances, only permitting the removal of existing trees which are dead, dying or dangerous. Where trees are removed, requiring their replacement with trees that ~~can attain~~ **are of** an equivalent value **Existing mature trees should always be replaced by trees of equivalent as possible maturity**

[it may be many years before a young replacement tree attains the full greening value of a mature tree.]

Suggest developers should be required to provide plans for new trees on all sites – or a justification why not

Developer contributions could also be used to fund investment in existing and new City gardens as this increases sustainability

(Continue on a separate sheet /expand box if necessary)

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

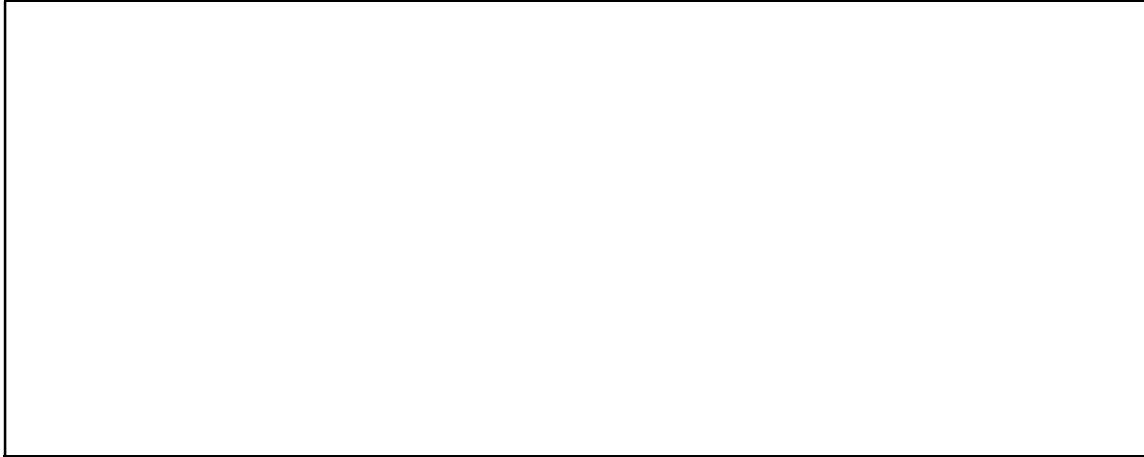
Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

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Barbican Association Response to City Plan 2040



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## Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	S15 Climate resilience	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

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The Barbican Association this this policy is not sound because it will not effectively ensure climate resilience over the life of the plan, particularly in relation to the impacts of urban heat as the prevailing summer temperature rises.

Representing people who live in the City, we are very concerned about the adverse effects of climate change on health, particularly for younger and older residents

There are technologies that can reuse heat generated in buildings rather than emitting it

See B&GLNF Evidence Bundle P *Urban Heat Island Effect* and E *Overheating and Climate Resilience*

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We suggest amending item 1:

**Development must contribute to a reduction in the City's urban heat island effect as well as minimising overheating within buildings**

(Continue on a separate sheet /expand box if necessary)

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

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## Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input type="text" value="x"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text" value="x"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text" value="x"/>	No	<input type="text"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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The Barbican Association thinks that this policy is unsound. It is not radical enough to prevent severe overheating in residential areas.

The City is in the high risk zone for overheating <https://www.gov.uk/government/publications/overheating-approved-document-o>  
 And the problem is compounded by other environmental issues in the City – because noise levels are such(see City’s noise strategy) that residents are unlikely to open their windows. This policy is ineffective by focusing on the resilience of new, largely office, buildings for the workforce inside them and not on reducing UHI for everyone in the City and addressing the impact on residents who, unlike office workers, are in the City all the time with little escape from the heat.

In addition the City’s own Local Area Energy Plan recommends that the Local Plan should require new developments with large heat rejection to provide the opportunity for the recovery and use of heat, either within the building or within wider networks, which need to be designed and created.

Please see the B&GLNF Response for a fuller discussion of this problem (section on Carbon, Climate, and Cooling) and B&GLNF Evidence E *Overheating and Climate Resilience*, and P *Urban Heat Island Effect*

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness

Barbican Association Response to City Plan 2040

matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

We suggest strengthening Item 2 to make it more effective

2. Building designs should make no additional contribution to the urban heat island effect, and ideally take measures to reduce it.

And creating a new item, as recommended by the City's LAEP report

Require any buildings with large heat rejection to provide the opportunity for the recovery and use of heat.

And a further item

Encourage the provision of Cool Places in hot summers, in both City and private buildings, particularly near residential areas

(Continue on a separate sheet /expand box if necessary)

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**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

Overheating is a really important issue for people who live in the City

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## Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	S23 KAOC Smithfield and Barbican	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
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Please tick as appropriate

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The Barbican Association considers parts of S23 to be unsound

Item 2. There is no evidence that pedestrian impermeability needs to be improved in the Barbican. The Barbican has a number of access points that are appropriate for a residential estate with a plan built around "town squares", and some protection for the residential environment in a busy city. Moreover, the Highwalks provide extensive public walkways around the estate. If there is a problem it is with wayfinding rather than permeability. Increasing permeability risks damaging both the listed landscape and residential amenity (see Barbican and Golden Lane Conservation Area SPD and Listed Management Guidelines for the Barbican estate (all SPDs)). However, improving accessibility to the Highwalks, through lifts and ramps, would be valuable.

Item 3 add "while protecting residential amenity for existing homes in the KAOC"

Item 6 We fully support improving the air quality in Beech Street, to which vehicles currently contribute so much. But we do not support "vitality". "Vitality" is a vague term and some forms of vitality may damage the residential amenity of those living above Beech Street. Sounds and smells carry upwards and along the tunnel into the residential estate (See B&GLNF Evidence O Beech Street). However, we agree that the pavements are too narrow and not suitable for people with impaired mobility.

We endorse the suggested wording of the Barbican and Golden Lane Neighbourhood Forum for this item (see next section)

## Barbican Association Response to City Plan 2040

Item 7 Increased greening is supported but whenever possible it should be at ground level (or on highwalks on the Barbican) because that is where the pollution is – and where the people who need protection from pollution and need shade are. This policy could be made more effective by expanding it to cover all types of pollution – particularly given its impact in a residential KAOC. That means restrictions on construction work at weekends and on the use of terraces near residences.

Also, the City is currently consulting on a new Air Quality Strategy 2025 – 2030. We may want to draw on any new evidence and requirements adopted in this strategy at the examination to make this item more sound

Item 8 would likewise be more effective if expanded to cover all aspects of accessibility, including wider pavements, safer crossing, more lifts (particularly to Barbican Tube station) and ramps

Item 11 “Routes between the Museum of London and the Barbican” is loose wording. Does Barbican mean the Barbican Arts Centre or the Barbican Estate? If it is the former then the implication is that Long Lane and Beech Street should be the site of food and beverage offers. Beech Street – even an improved Beech Street is unsuitable for food and beverage offers. It houses several car park and service entrances (including for emergency vehicles), and noise and smells carry in many ways into the residential estate above and alongside Beech Street (See B&GLNF Evidence on Beech Street)

The Barbican Association endorses the suggested wording of the Barbican and Golden Lane Neighbourhood Forum for this policy.

Item 13. To avoid misunderstanding this item – which we support – should make clear that the area has more than one “special character” – and it should be explicit that it includes the special character of Barbican and Golden Lane as residential areas as well as the special character of Smithfield as a late evening, 24 hour place. As the Barbican Association noted in the previous iteration of this plan there is “a spatial clash between the Northwest of the City being one of its biggest residential areas [indeed it’s biggest], with more housing planned, and the site of the City’s major cultural offer, with more 24 hour activity planned. This is a fundamental contradiction and there are no policies in the Plan to resolve that clash.” That clash remains as policy S23 is currently worded

Item 13 We also think that Item 9 in S24 Smithfield should be moved to S23 so that it applies throughout the whole Key area and not just to Smithfield

Item 14. Like the Neighbourhood Forum we think that an additional policy is necessary to improve access, accessibility, and safety at the Beech Street-Long Lane/Aldersgate Street junction. The junction is currently busy – with vehicles, pedestrians, and cyclists – unpleasant, and feels unsafe. Given the increased numbers of visitors to this area, and an increased residential population (14.8.3) such improvement is necessary for the health, welfare, and quality of experience of visitors, workers, and residents.

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Suggest

2. Improving inclusive and pedestrian accessibility through large sites such as Smithfield Market, **and by encouraging better lift and ramp access to Barbican Highwalks whilst seeking to preserve pedestrian access, heritage characteristics, open space, amenity, privacy, security and noise abatement for residents and businesses;**

6. Making improvements to Beech Street to reduce the volume of vehicle traffic, improve air quality and increase amenity and **widen pavements and make it more accessible without worsening neighbourhood traffic, air quality, or access.**[delete "vitality"]

7. **Seeking to minimise pollution levels by resisting demolition/construction at weekends, restricting access at all times to new non-residential terraces, reducing and curtailing nighttime light pollution, managing traffic and increasing green infrastructure at street (and Highwalk) level.**

8. **Seeking improvements to accessibility for all including wider pavements, safer crossings, more reliable lifts and ramps (such as at Barbican tube) and better cycle routes.**

10. Supporting the provision of additional hotel uses in appropriate locations, where they are complementary to the City's business role, **especially where this allows sensitive retrofitting of heritage assets that are not suitable for specialist housing and would otherwise be lost**

11. **Encouraging the retention of the existing leisure, retail, food and beverage uses along Long Lane, Carthusian Street, Aldersgate Street/Goswell Road (A1) (and the Barbican launderette), as these businesses play an important role in supporting the residential community and local economy.'**

13. Enhancing the several special **characters of the area (including the residential and listed characteristic of the Barbican and Golden Lane estates)** through sensitive change, **taking account of the Barbican and Golden Lane as predominantly residential and tranquil areas with a world class cultural centre and that of Smithfield as a 24 hour economy**

14. [Item 24(9)]. **Ensuring new activities and developments contribute to a reduction in freight and vehicular movements, whilst not adversely impacting the operation of businesses and amenity of residents;**

15. **Encourage improvements to the Long Lane/Beech Street/Aldersgate junction and its public realm, together with better accessibility for all, public toilets and lifts to the Highwalk.**

16. **Buildings that are significantly taller than their surroundings will be resisted**

(Continue on a separate sheet /expand box if necessary)

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?



## Barbican Association Response to City Plan 2040

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

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8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

This is the residential area in which we live. We want to argue for protections for residential amenity – some of which will be resisted (eg No construction work on Saturday mornings in residential areas. This was refused in 2018 (see Report to Environmental and Port Health Committee on Consultation on Noisy Saturday Construction Work Activities in the City of London

(<https://democracy.cityoflondon.gov.uk/documents/s105714/PHES%20-%20NOISY%20SATURDAY%20WORKING%20CONSULTATION%20NOV18.pdf>)

The survey was undermined from the start by the decision of the committee to seek views on applying no Saturday working where it would affect any residence – where the request was for restricting Saturday work next to or in residential areas – a concept which this Plan clearly recognises.

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## Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph	<input type="text"/>	Policy	S23 B Barbican and Golden Lane	Policies Map	<input type="text"/>
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4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>
4.(2) Sound	Yes	<input type="checkbox"/>	No	<input checked="" type="checkbox"/>
4 (3) Complies with the Duty to co-operate	Yes	<input checked="" type="checkbox"/>	No	<input type="checkbox"/>

Please tick as appropriate

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

The Barbican Association notes that there is a policy 24 Smithfield for the sub area of the KAOC Smithfield and the Barbican.

We are puzzled why there is no parallel policy to cover the Barbican part of this KAOC. This is a particularly unhelpful omission because the two sides of the area are very different in character. Although "culture" is an important strand in all the KAOC, as is "residential" – the character of Smithfield is that of a night time 7 day a week economy, whereas the other – more easterly - part of the area contains the largest residential concentrations in the City and is predominantly a residential area.

It cannot be effective policy not to have separate policies for such distinct sub-areas.

We also note that the Smithfield part of the KAOC is undefined spatially, which is unhelpful. The Barbican and Golden Lane Neighbourhood Forum (of which the Barbican Association is a founder member) is also arguing for an additional policy for the Barbican part of this KAOC, which we support. It has suggested that the boundary should be that of the recently established barbican and Golden Lane Neighbourhood Area. That makes sense to us.

The evidence for having an additional policy covering the Barbican is strong:

1. There is now a Neighbourhood Forum covering the area – this already recognises that there is a coherent character to the area that merits specific policies
2. The policy S24 for Smithfield says that residential development will be resisted in Smithfield because the night time economy makes it hard to protect residential amenity. Given the intention of this Plan to protect residential amenity in residential areas and its policy of sanctioning new housing only in or next to existing residential areas, that implies that the rest of the area is suitable for housing. But the policy doesn't actually say that.
3. The City of London's own evidence base proves that Barbican and Golden Lane is a unique area which demands special treatment.
4. Further evidence is provided by the Barbican and Golden Lane Conservation Area SPD and the two sets of Listed Building Management Guidelines SPDs and the Barbican and Golden Lane Area Strategy (2015).
5. Moreover, the Barbican Association has already pointed out in relation to an earlier version of the plan that there is a spatial clash between the Northwest of the City being its biggest residential area, with more housing planned, and the site of the City's major cultural offer, with more 24-hour activity planned. This is a fundamental contradiction and there are no policies in the Plan to resolve that clash. A new policy covering Barbican might help resolve the clash – we call it Policy 23B

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

[This is the same as that proposed by the Barbican and Golden Lane Neighbourhood Forum]

**Strategic Policy S23B: Barbican and Golden Lane**

The City Corporation will protect and enhance the predominantly residential, cultural and historic character of Barbican and Golden Lane by:

1. Supporting residential development that meets specific local needs for specialist elderly accommodation and affordable rented accommodation in the [corrected boundary] "identified residential areas".
2. Enhancing, maintaining and encouraging sensitive refurbishment of the Barbican Arts Centre and Guildhall School of Music and Drama as a focus for the strategic cultural area recognised in the London Plan, and supporting the reuse of the Barbican Exhibition Halls for start-ups, digital and creative industries, cultural organisations and artists/makers;
3. Resisting development adjacent to the Barbican Estate and Golden Lane Estate and the residential blocks and streets of the area that has an adverse effect on residential amenity in this predominantly residential part of the KAOC which does not have a late evening, 7 day a week character;
4. Enhancing the distinctive character of the area by retaining residential and listed buildings and encouraging new development which respects:

## Barbican Association Response to City Plan 2040

- a. the predominant low-rise and mid-rise character of the Brewery Conservation Area and the Barbican and Golden Lane Conservation Area
  - b. the heritage, design and fabric of the Registered Landscapes, Parks and Gardens and also of the Grade II and Grade II\* Listed Buildings
  - c. the reference heights and grain of the neighbourhood
  - d. the Barbican Estate Listed Building Management Guidelines SPD and Golden Lane Estate Listed Building Management Guidelines SPD
  - e. and keeps an appropriate distance from the trinity of Barbican towers to protect their composition, and does the same for Great Arthur House.
5. Protecting the heritage and plan of both the listed Barbican and Golden Lane estates – the way squares are formed and the way that Highwalks – whether high level or ground level - intersect with them. Developments that cut across these original plans will be resisted.
6. Resist loss of Highwalks and Highwalk ramps, and encourage new Highwalks that sensitively integrate with the existing ones and do not damage residential amenity. Encourage the provision of lift access to the Highwalk from Aldersgate St (w) near Barbican tube through developer contributions or directly.
7. Supporting the relocation of the Museum of London to Smithfield, and encourage meanwhile cultural and community use of the original Museum of London building and Bastion House during the relocation;
8. Protect amenity by requiring developments to restrict access to new office and commercial roof terraces, install automated blinds, increase green infrastructure with emphasis on tree cover to mitigate urban heat island effects and refrain from noisy deconstruction and construction works at weekends and bank holidays. Developments should also demonstrate how they will avoid generating additional light pollution with an emphasis on any residential neighbour impacts and fully reference the City of London's Lighting Supplementary Planning Document;
9. Urban Greening
- c) Development must achieve a minimum UGF score of 0.4, and 0.6 for major development in the area
  - d) Any Biodiversity Net Gain should be required to be delivered within the Barbican & Golden Lane Area so that it benefits the local community and environment.
10. Development adversely affecting health and sport facilities will be resisted.
11. Air Quality
- a) Development should not damage the health of the air by increasing emissions of harmful pollutants to it. Such pollutants include: greenhouse gases; those considered by the United Nations to cause adverse impacts to the natural environment; and particles and gases considered by the World Health Organisation (WHO) to be harmful to human health. Barbican & Golden Lane, being predominantly residential, is a sensitive receptor zone and any proposal that results in an increase in air pollution will only be justified in exceptional circumstances.
  - b) Development should comply at least with all minimum UK environmental requirements in relation to air pollutants.
  - c) All development must be at least 'air quality neutral' and not cause or contribute to worsening air quality. On major development this should be

demonstrated through an Air Quality Impact Assessment which must additionally demonstrate how local air quality can be improved across the proposed development as part of an air quality positive approach.

d) Major development must demonstrate that it is designed to ensure that indoor air quality complies with the latest WHO guidelines for short and long term air quality including particulate matter (PM2.5 and PM 10 ), nitrogen dioxide (NO 2 ), carbon monoxide (CO), formaldehyde and volatile organic compounds (VOCs). Carbon dioxide (CO 2 ) concentrations in indoor air should also be considered. Compliance with such standards is also encouraged on medium development and substantial refurbishment schemes.

e) Air intake points servicing internal air handling systems (including air filtration systems and heating and cooling systems) should be located away from Beech Street, Aldersgate Street, London Wall, Wood Street, Fore Street, Silk Street and Moor Lane.

f) Flues should be directed away from residential dwellings.

12. Encourage the retention of ground floor retail units at Crescent House on Aldersgate Street/Goswell Road (A1), in the Golden Lane Estate, as these provide an important local shopping, food and drink offering for local residents in an area that otherwise lacks nearby retail uses..

(Continue on a separate sheet /expand box if necessary)

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7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

**No**, I do not wish to participate in hearing session(s)

**Yes**, I wish to participate in hearing session(s)

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## Barbican Association Response to City Plan 2040

The Barbican Association represents the residents of the largest cluster of housing – in a world class piece of urban design – in this KAO. We anticipate resistance to some of these proposed policy changes and we want to argue why they are necessary

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## Model Representation Form for Local Plans

 <p><b>CITY OF LONDON</b></p>	<h3>Local Plan</h3> <p>Publication Stage Representation Form</p>	<p><b>Ref: Reg 19</b></p> <p><b>(For official use only)</b></p>
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**Name of the Local Plan to which this representation relates:**

City Plan 2040

**Please return to City of London Corporation BY 11:00PM 17 June 2024**

emailing to: [planningpolicyconsultations@cityoflondon.gov.uk](mailto:planningpolicyconsultations@cityoflondon.gov.uk)

Please note that all representations will be made public on our website in line with the Town and Country Planning (Local Planning)(England) Regulations 2012. This will include the name of the person and, where relevant, the organisation making the representation. All other personal information will remain confidential and managed in line with the City Corporation's privacy notice.

For more information on how we collect and process personal information, and your rights in relation to that information, please refer to the Environment Department's privacy notice available at [Environment Department Privacy Notice \(cityoflondon.gov.uk\)](http://cityoflondon.gov.uk) and the City Corporation's privacy notice available at [www.cityoflondon.gov.uk/privacy](http://www.cityoflondon.gov.uk/privacy)). Please also see our Statement of Representations Procedure available at: [City Plan 2040 - City of London](http://City Plan 2040 - City of London).

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This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

---

### Part A

1. Personal  
Details\*

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

2. Agent's Details (if  
applicable)

Title

Ms

First Name

Jane

Last Name

Smith

Job Title	Chair, Planning Subcommittee, Barbican Association	
(where relevant)		
Organisation	Barbican Association	
(where relevant)		
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3		
Line 4	[REDACTED]	
Post Code	[REDACTED]	
Telephone Number	[REDACTED]	
E-mail Address (where relevant)	[REDACTED]	

---

Our responses are given on separate Part Bs for different policies, together with an introduction



## Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

4. Do you consider the Local Plan is:

4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
4.(2) Sound	Yes	<input type="text"/>	No	<input type="text"/>
4 (3) Complies with the Duty to co-operate	Yes	<input type="text"/>	No	<input type="text"/>

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5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

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applicable)

Title

First Name

Last Name

---

Job Title	Chair, Planning Subcommittee, Barbican Association	
(where relevant)		
Organisation	Barbican Association	
(where relevant)		
Address Line 1	[REDACTED]	
Line 2	[REDACTED]	
Line 3		
Line 4	[REDACTED]	
Post Code	[REDACTED]	
Telephone Number	[REDACTED]	
E-mail Address (where relevant)	[REDACTED]	

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Our responses are given on separate Part Bs for different policies, together with an introduction

## Part B – Please use a separate sheet for each representation

Name or Organisation:

3. To which part of the Local Plan does this representation relate?

Paragraph  Policy  Policies Map

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4.(1) Legally compliant	Yes	<input type="text"/>	No	<input type="text"/>
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