

Felgate, Gavin

From: Jane Smith [REDACTED]
Sent: 17 June 2024 15:36
To: Planning Policy Consultations
Subject: Response to City Plan 2040 from Seddon House Group Barbican
Attachments: Response to City Plan 2040 from Seddon House Group.docx
Categories: CONFIRMED

THIS IS AN EXTERNAL EMAIL

Please find Seddon's response to the Plan

Perhaps you could acknowledge safe receipt
Thank you

Best wishes
Jane Smith

From Seddon House Group

c/o [REDACTED]

17 June 2024

Response to City Plan 2040 from Seddon House Group

Seddon House Group is the RTA representing the 76 flats in Seddon House in the Barbican. We are also a member of the Barbican Association and we endorse their responses to this policy.

Our major concerns are protecting and enhancing the character of the listed Barbican estate (which is also in a conservation area) and the liveability of the City – in relation to environmental noise, air quality, the urban heat island effect.

The current Plan is unsound in that it fails to protect conservation areas and listed buildings and landscapes from the effects of the huge amount of office building that the City includes in this plan.

Historic environment and conservation areas

The existing plan includes policies that restricted tall buildings (defined as significantly higher than their surroundings) in conservation areas (CS14).

A casual reader might think that the 2040 plan does the same because it designates two areas of the City, neither of them conservation areas, as sites for tall buildings. But it has redefined tall to mean 75 m or over AOD. These leaves a lot of room for much higher buildings to dominate their surroundings.

Policy HE1 We seek an additional item

Permission will be refused for buildings significantly higher than their surroundings in conservation areas

Liveability

We propose changes to the following policies to enhance the quality of life in the City of those who live there.

This means that development needs to pay serious attention to improving the environment to make it more healthy for residents. If it does that it will benefit workers and visitors too.

We therefore want to see measures taken to reduce the urban heat island effect, reduce noise levels, increase the amount of open space at ground level, and in particular increase the amount of greenery at ground level, including mature trees

We propose (new policy wording in bold)

S 15 Development must contribute to a reduction in the City's urban heat island effect as well as minimising overheating within buildings

S18 (13) 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**

We think the current policies on noise and light pollution are ineffective and seek additions to the following policies.

HL3

Item 3. Noise and vibration from deconstruction and construction activities must be minimised and mitigation measures put in place to limit noise disturbance near development. **Developments will be required to comply with the City's Code of Practice for Deconstruction and Construction Sites, which will be secured by way of a condition, the conditions not to be discharged without compliance with the Code**

New item

There should be no deconstruction or construction work in or adjacent to residential areas on Saturday mornings or bank holidays, and extensions of working time will not be allowed for routine work but only for exceptional works that for regulatory or other reasons cannot be done during the weekdays

Item 4 Developers will be required to demonstrate that there will be no increase in background noise levels associated with new plant and equipment **or any other aspect of the development, in line with the agent of change principle.**[existing wording, but a separate point from item 3]
[renumber remaining points]

Add to item 5

When bringing forward major development proposals, developers should explore opportunities to enhance the existing acoustic environment. **This must include noise assessments to show how developments will make a positive contribution to bringing environmental noise levels within WHO guidelines of 53dB Lden (adjusted 24 hour average) and 45 dB Lnight (night time average), starting with residential areas.**

DE4 (1 b) "There would be no immediate overlooking [from terraces] 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.**

DE7(1)

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.

DE8 – An additional item should be added:

Automated blackout blinds should be fitted to office windows next to residences, set to drop at 7pm every evening

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**

HS3 (adopted from Barbican Association response)

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)

S14

Add to item 1

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

OS2

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

DE9 – new policy (as suggested by the Barbican and Golden Lane Neighbourhood Forum

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.**

We also support the new policy of S23B proposed by the Barbican and Golden Lane Neighbourhood Forum, and supported by the Barbican Association, to ensure that the character of the Barbican and Golden Lane areas is recognised as being predominantly residential , within listed iconic examples of urban planning and with a world class cultural centre within the Barbican.

Jane Smith
Chair Seddon House Group