

## Thomas More House Group (RTA - Barbican) Reg 19 consultation submission

R0212

Chairman TMH [REDACTED]

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To: Planning Policy Consultations &lt;PlanningPolicyConsultations@cityoflondon.gov.uk&gt;

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The Thomas More House Group (a Recognised Tenants' Association) represents 166 homes on the Barbican Estate. Its comments on the City of London Draft Local Plan 2024 are set out below.

**Summary:** The Group finds the Draft Plan unsound, arguing it fails to protect the Barbican Estate's character, historical environment, and residential amenities. The plan's proposed downgrading of heritage protections conflicts with the National Planning Policy Framework (NPPF) and the Planning (Listed Buildings and Conservation Areas) Act 1990. The Group endorses the Barbican Association's submission.

**Policy Change Proposals:****1. Reinstate Core Strategy Policy CS12:**

- Protect the City's listed buildings and conservation areas, maintaining their distinctive character while allowing sympathetic development.

**2. Health and Care Infrastructure:**

- Address the London Plan CG3 (E) requirement to plan for appropriate health and care infrastructure.

**3. Construction and Pollution Control:**

- Restrict demolition/construction on Saturday mornings.
- Engage with neighbours to minimise adverse impacts.
- Reduce air pollutants to meet WHO guidelines.

**4. Noise and Social Facilities:**

- Require noise assessments to meet WHO guidelines.
- Protect and improve existing social and community facilities.

**5. Residential Amenity:**

- Ensure new land uses are compatible with residential areas, adhering to the agent of change principle.

**6. Open Space and Heritage:**

- Resist the loss of open space and protect views in redevelopment.
- Focus on maintaining and repairing listed housing as heritage assets.

**7. Daylight, Privacy, and Noise:**

- Design developments to minimise overlooking and protect privacy, daylight, and sunlight.
- Submit Residential Visual Amenity Threshold (RVAT) assessments.
- Minimise light spill and require automated blinds in offices near residences.

## 8. Evening and Nighttime Use:

- Strengthen the agent of change principle to include all developments, not just new residential.

## 9. Sustainable Design:

- Include measures to reduce the urban heat island effect and improve air quality.
- Prioritise ground level open space and greening.

## 10. Daylight and Sunlight Impact:

- Align policies to specify “cumulative impact” and assess the impact on residential daylight and sunlight.

## 11. Lighting Controls:

- Install automated blackout blinds and control illuminated displays facing homes.

## 12. Residential Amenity Policy:

- Ensure developments provide high quality residential environments and minimise adverse impacts.

## 13. Freight and Servicing:

- Require major commercial developments to manage freight servicing internally.
- Restrict access routes near residences, cycle routes, and pedestrian corridors.

## 14. Historic Environment:

- Strengthen Policy HE1 to actively enhance conservation areas.

## 15. Tall Buildings:

- Reinstate the wording of current local plan Policy CS14 to deem tall buildings inappropriate in conservation areas.

## 16. Open Spaces and Green Infrastructure:

- Create and protect new ground-level open spaces, making them publicly accessible and resisting any loss of such spaces.

Finally, the Group supports the Barbican Association and the Neighbourhood Forum's proposals for changes to the Barbican & Smithfield Key Area of Change (KAOC) and a new strategic policy for the Barbican & Golden Lane area.

Best wishes,

Brenda Szlesinger (Chair of Thomas More House Group)