



## Representing the interests of Barbican Residents

# City of London Local Plan Response from Barbican Association

## 1. Introduction and general comments

There is much that we welcome in this plan.

1. We welcome the recognition of residential areas, where protection of residential amenity should be stronger than it has been in the past.  
We suggest some further strengthening (see section 2 and comments on tall buildings, hotel developments, late night economy, Culture Mile).
2. We welcome the commitment to examine the cumulative effect of development on residential amenity – particularly daylight and sunlight and noise and light pollution. But we would like to see more specific proposals on how cumulative impact assessments will be done.
3. We have one major concern. The plan seems to rely heavily on “management” to deal with conflicts between policies in this plan – eg to manage the potential disturbance caused by late night economy activities on residential amenity. We do not think this is anywhere near as effective as spatial planning to ensure that noise-generating uses are not sited next to residential areas, and we would like to see more commitment to spatial planning to protect residential amenity.
4. The vision, and this plan, contain ambitions that potentially conflict. The Plan is silent on how these may be resolved.
5. We would like to see more resources and effort go into enforcing the policies in this plan.
6. We would like to see some statement in this plan on how it can be monitored and that the monitoring should be ongoing.

We elaborate on these points in the section below.

## 2. Suggestions for Strengthening the Plan

### *Residential areas*

We understand why the City has decided to only allow new residential development in existing residential areas – to prevent the needs of residents from interfering with the City’s commercial development and to better protect residential amenity.

We also welcome the greater emphasis in this plan than in the previous one on protecting residential amenity.

To enact and embed that emphasis, however, we would like to see Strategic Policy S3 Housing provide more detail on “protecting existing housing and amenity”. At present S3 gives detail on “providing additional housing” but gives none on “protecting existing housing and amenity”. We suggest that elements of Policy H3 Residential Environment should be summarised in the main S3 policy. A point 5 could say something like

5. In identified residential areas uses that adversely affect residential amenity will be resisted and the cumulative affect of developments and activities on residential amenity will be taken into account in assessing those adverse impacts

Without this, the many fine words in this plan about protecting residential amenity, have little value because they are not embodied in a strategic policy.

We would welcome further changes in this plan to ensure real protection of residential amenity. There are too many places in the plan where the hope is that disparate activities can continue to be balanced by “mitigation” measures, “good management” etc. We would like to see some firm commitments that some applications in or next to residential areas will be refused because the activities are incompatible with residential life.

### ***Cumulative effects***

There need to be clear standards for doing cumulative impact assessments, so they are done consistently and to a high standard. The cumulative impact assessments need to take into account the effects of all existing and approved developments that have an impact on the site in question, regardless of when they were approved.

So we think the City needs to specify a methodology otherwise the issue will be “gamed” by developers and lead to inconsistent assessments.

The area to be covered should be defined by the developments that have an affect on the site in question.

The assessment of cumulative effect needs to go back far enough so that it is not just seen as tokenism. The average life of a commercial building in the City is we understand about 25 years, so assessments involving commercial buildings should go back at least that far.

In this respect see

<https://www.bcbc.com/publications/2012/cumulative-impact-assessment-is-it-just-a-fancy-way-of-identifying-and-managing-risk>

for some helpful definitions of CIA, including that a cumulative impact is “an impact on the environment (that) results from the incremental impact of the action (under review) when added to other past, present and reasonably foreseeable future actions”. The full report leading from this site pinpoints some of the conceptual and methodological issues with CIA.

More helpful might be the Environmental Statement prepared by AECOM for the Stamford Bridge Ground Redevelopment: <https://www.rbkc.gov.uk/idoxWAM/doc/Other-1745672.pdf?extension=.pdf&id=1745672&location=VOLUME2&contentType=application/pdf&pageCount=1>

This deals with the cumulative impact on “sensitive receptors” (include residential) in London and offers a practical way to deal with the methodological challenges.

We would also commend, in relation to residential areas, that residents themselves are a resource because some of them will have lived in their residences for some decades and will remember the building preceding the ones that are to be redeveloped.

We understand that the City now has a digital model of all the buildings in the City. Removing and insert models of buildings could be used to assess the effects on, for example, daylight and sunlight to nearby residences. We understand that the model does not show fine detail, such as individual windows, for most areas of the City – but one approach would be to add that detail as developments were proposed as part of doing a cumulative assessment.

### ***Management of potential nuisance rather than spatial planning***

In many places the Plan relies on “good management” of the activities within and around a building to ensure that conflicting activities do not cause disturbances to residents. However, “management” is a weak tool compared with spatial planning. Moreover, “good management” is also not in the gift of the Planning Committee. The developer of a building may not be the operator of the building, and operators change over time. Plans are forgotten or ignored. The nuisance may end up imposing years of disturbance on residents and result in more work for the City’s environmental health team.

The Local Plan is about spatial planning and we would like to see a commitment in this plan that activities that are incompatible with residential amenity (licensed premises, clubs, late night activity) will be dealt with by at the very least design restrictions and not simply the reliance on the production of a management plan. What we mean by design restrictions is, for example, that entrances and windows should not open onto a street or area opposite residences. If this is not enough to protect residential amenity (for example even though an entrance to a night club might be obscured by a building the natural dispersal route would be down a residential street or area) then we would like to see applications refused.

Where a developer is required to produce a management plan to protect residential amenity we would like to see some clarification of how subsequent operators of the building can be bound by it. The planning condition needs to specify the contents of the management plan.

If a management plan has to be relied on we would be looking for elements such as:

Doors and windows placed away from residential streets

Double doors to ensure that noise did not leak beyond the premises

A requirement that noise inside the premises should not be heard outside the premises

A requirement that taxis should not wait outside the premises in a residential street (even if their engines aren’t on, taxis can disturb through the conversations and mobile phone or radio conversations of their drivers)

Dispersal routes for clients away from residential areas

Stewarding of clients entering or leaving

### ***Handling conflicting policies within the plan***

The vision, and this plan, contains ambitions that potentially conflict, and there is little guidance on how those conflicts will be resolved.

It would be helpful if the plan contained a statement of how strategies are prioritised and how conflicts will be resolved. We understand that Strategic Policies carry the most weight, and it is for that reason that we would like to see S3 on Housing amplified to say more about protecting the amenity of existing residents in the residential areas. Without that, we are left thinking that the many helpful phrases in this plan about protecting residential amenity will end up as warm words lost in a contest with strategic policy S24, for example.

As an example of a potential conflict in the plan itself there is strong support in S1 for reducing noise pollution and protecting the more tranquil parts of the City. As the Open Spaces Strategy makes clear, the riverside is exceptional in the City for its tranquillity. Yet 3.4.4 commits to improving the

“vibrancy” of the riverside by allowing more retail, leisure and cultural public uses at ground level. Yet that will destroy its tranquillity. Permission should not be granted for outdoor retail/seating and noise generating events along the riverside.

Similarly, the City’s Noise Strategy acknowledges that the Barbican Estate is another area of the City that is tranquil, something that is appreciated by residents and visitors alike. Yet the Culture Mile (S24) supports more retail, hotel, and leisure uses. The Plan needs to be more specific on zones in the Culture Mile where such activity is appropriate and allowed and zones (ie residential areas) where it is not.

### ***Ensuring high quality visual design***

We suggest that the City should have a design review panel to comment on the architectural merit of buildings, to encourage more sensitivity to the surrounding area and less egotism in designs. Such a panel could raise the standards of submitted designs (3.3.5) by setting standards for the quality of architecture that the City needs, assessing applications, and helping applicants meet the highest standards of visual design.

We understand that officers oppose this because one borough that has such as panel ends up with inconsistent opinions because of the changing membership of the panel. This sounds like a problem that could be avoided in the way the panel is set up – for example by having a small group of trusted panellists who meet regularly and consistently and devise some guidelines on what they expect to see. Also, the urban design criteria contained in the Plan suggest that the role of a panel would be to interpret whether a proposal met these criteria, not necessarily to establish new criteria.

### ***Enforcement***

The City’s current resources for enforcement are slight. Good conditions are useless if developers and operators know they will not be enforced.

We would also like to see requirements in conditions given more precision (as mentioned under Management above), which would, of course, aid enforcement. For example, on light pollution as well as specifying that developers should install automated systems to turn office lighting off, the City should also specify that they commission those systems and operate them, and specify the hours at which they should operate. If night working in offices is necessary then the condition should specify the installation and *operation* of black out blinds. We suggest that these should operate so light is not visible at nearby residences between 7pm and 8 am.

## **3. Draft Vision and Strategic Objectives**

### **3.1 Flourishing Society**

We support the need for affordable housing (including social housing) in the City (3.1.4)

As stated in section 2, we do not think that good design and good management (3.1.6) on their own are enough to reduce the potential for anti-social behaviour and adverse impacts on residents in mixed used areas.

We therefore support the concept of identifying and strengthening residential areas and keeping housing out of commercial zones (3.1.4)

### **3.2 Thriving Economy**

We welcome the emphasis on flexible adaptable office designs (3.2.3). The current habit of rebuilding offices every 25 years is wasteful and unsustainable (as recognised in Policy CEW1), and it contributes (through the number of construction sites) to much of the unpleasantness of the City's streets (see the City's Transport Policy).

How robust is this plan to changes in the forecasts for the growth of the economy, the workforce, and the need for office and retail space?

### **3.3 Outstanding Environments**

We see nothing in this plan that will ensure that the built environment will be "outstanding." Current new development in the City varies from the outstanding, through interesting, dull, to truly ugly and disproportioned – and there is no attempt to ensure that new buildings respect the architecture of those around them. The existing buildings surrounding the Tower of London are a good example of the results of a *laissez faire* approach to development.

As above, we suggest that the City should have a design panel to help ensure outstanding new building.

We would like to see mention of the City's 20<sup>th</sup> century heritage in 3.3.6 – ie "The City's rich architectural and archaeological heritage (*including its twentieth century heritage*) will continue to be conserved and enhanced." As the Barbican is a large development of note, with a specific purpose, it might be mentioned too as an area whose setting should be respected, along with that of St Paul's and the Tower of London.

### **3.4 Key Areas of Change**

#### **3.4.1 Smithfield and the Barbican**

The change in this area results from two stimuli – Crossrail and the Culture Mile. However, the Culture Mile remains ill defined (and much of it is activity within buildings), and with the opening of Crossrail and the closure of Smithfield market there is a risk of more office development. Without a defined future use Smithfield market itself may end up as offices. We would like to see an assessment made of the options for the use of Smithfield Market, and we make a suggestion for a use for Smithfield market that would fit with the Culture Mile (see p14 ]under Strategic Policy S25 Culture Mile).

We remain concerned, however, at the potential for conflict between the aspirations for the Culture Mile – more visitors, more evening and night time activities – and we are sceptical about relying on good management to resolve this conflict.

## **4. Key policies**

### **4.1 Healthy and Inclusive City**

**Strategic Policy S1** – We welcome this policy.

We would like to see more robust language around "respect the City's quieter areas" – eg by not allowing uses that generate noise, such as late night entertainment, crowded places.

4.1.6 Please specify that the health impact assessments should include the effects of the development on other users' access to daylight and sunlight and the potential impact of night time noise on sleep in residences.

*Policy HIC1 Inclusive buildings and spaces*

Please add that new development should be taken as an opportunity to improve public access by assessing the need for public lifts, escalators, etc. For, example the City could require the installation of a public lift to the Barbican tube station platforms when the buildings around the Barbican tube are redeveloped, to make the tube station fully accessible.

Please add that public lifts installed by developers should meet certain standards and ensure arrangements for adequate maintenance to keep the lifts in continuous service.

*Policy HIC2 Air quality*

We welcome this policy.

Point 7. Add that combustion flues – and other vents and their associated plant – should be properly maintained. Conditions might need to specify the frequency of cleaning and maintenance.

This policy – and the Transport Strategy – imply that there should be fewer vehicle movements in the City. Should it not also imply that developments that will bring vehicles to the City – such as hotels – should be discouraged.

*Policy HIC3 Noise and Light pollution*

This policy is particularly welcome to Barbican residents. Both noise and light pollution have been growing problems over the past decade – as the City has got busier and more developed. We remind planners that the centre of the Barbican estate is one of the City's most tranquil spaces (Noise Strategy), and we would like to keep it that way – as befits a residential area. It is also notable for its biodiversity and for the bats that roost there because it is relatively dark.

4.1.3 In addition to the Lighting Strategy Guidelines we would like the City to specify that developers should install and *operate* automated systems to turn office lighting off (so it is not visible at nearby residences between 7pm and 8 am) or enforce the use of blinds between those hours.

We also point out that some of the most bright lighting in the City skyline at night is from the construction sites for tall buildings. The Code of Construction should require developers to limit the lighting on construction sites to the minimum necessary for safety.

Please also add something on fire alarm testing. Such tests shatter the weekend peace. Please confine fire alarm testing to weekdays between 8 am and 9 pm. Ideally, this should be City wide because some alarms are on the roof and can be heard across the City.

*Policy HIC5 Location and protection of social and community facilities*

We welcome this policy.

*Policy HIC6 Public conveniences*

We support this policy. Urinating in public late at night is a problem in the City – and does not fit the City's vision as a world class financial centre.

*Policy HIC7 Sport and recreation*

*Policy HIC8 Play areas and facilities*

We support these policies.

**4.2 Safe and Secure City**

**Strategic Policy S2** – We welcome this policy.

Please add something about ensuring fire safety in existing and new buildings, both residential and offices, paying attention to building materials and construction methods.

*Policy SSC2 Dispersal routes*

Please make specific mention of the need to protect residential amenity by ensuring that the full extent of routes (eg to tube stations) is channelled away from residential areas. Broken sleep caused by street noise is a health issue.

### **4.3 Housing**

#### ***Strategic Policy 3***

This policy makes no mention of social housing. Affordable housing is often expensive, and the City needs key workers – teachers, nurses, policemen, carers, etc – to be able to live nearby

It also makes no mention of hostel and step up accommodation for homeless people – of whom there are an increasing number in the City. There should be a policy on homeless hostels – this should be more of a priority (and a more implementable one) than self-build accommodation, yet self-build accommodation has its own policy (H9).

As mentioned in section 2 we suggest an additional item 5 in this policy:

5. In identified residential areas uses that adversely affect residential amenity will be resisted and the cumulative effect of developments and activities on residential amenity will be taken into account in assessing those adverse impacts.

This is to embody in a major strategic policy the intention, stated several times in the plan, to provide better protection for residential amenity.

*Policy HI Location of new housing*

We support this policy.

We hope the City will consider residential development for the Bastion House site. It is next to the Barbican, the City's largest single area of housing.

*Policy H3 Residential environment*

This policy is very important to Barbican residents and we support it. We welcome the intention to resist uses that will adversely impact residents. As stated in section 2 of this response, we would like this intention backed up with more specific statements about refusing certain sorts of applications in residential areas.

Item 1. We would like you to strengthen the wording to make it clear that adequate noise mitigation measures in mixed areas include design solutions such as ensuring that entrances (including delivery entrances) are sited at the side of buildings that are away from residential frontages.

Item 4 We particularly welcome the provision in item 4 that the cumulative impact of individual developments on the amenity of existing residents will be considered.

4.3.34 This seems to undermine the thrust of Policy H3. If this is meant to refer to residences that are not within residential areas (as suggested at the Local Plan presentation on 28 January 2019) please make that clear.

4.3.40 Amenity space could include... “roof top terraces.” Please includes hours of operation for these where they are next to existing residences – the noise from terraces is a demonstrable nuisance (see for example, problems with the use of terraces at Moor Place).

*Policy H8 Older persons housing*

We welcome this policy.

*Policy H9 Self and custom housebuilding*

How realistic is this policy? The City itself proposes only to build 146 houses a year – because of lack of land on which to build. And many self-builders do self-building to limit their costs, yet land in the City is ferociously expensive.

**5.1 Offices**

***Strategic Policy S4***

Item 1 We note that the rate of growth of office building slows dramatically after 2026 and that most of the projected new office buildings are already under construction.

Item 2. We hope that the requirement for office floor space to be adaptable will result in more sustainable buildings that do not have to be redeveloped every 25 years. This would conserve resources, reduce air pollution, and make the day to day environment nicer.

*Policy O1. Office development*

We support this policy.

However, we think the City could do more to ensure outstanding design by being more interventionist on the quality of designs, using a design panel to judge the quality of designs, as suggested in section 2 of our response.

**5.2 Retailing**

***Strategic Policy S5***

Item 6. Please add an additional caveat “where they would not detract from...retail links *or damage residential amenity or spoil heritage assets.*”

We are thinking of the Barbican here, where some of the surroundings of the estate should not have active frontages because the design conception of the Barbican is to make it inward looking and active frontages would destroy that and potentially disturb residential amenity. There are other ways of making these streets attractive (more gardens, subtle lighting).

5.2.5 Figure 9

It is not clear why Golden Lane is identified as a Retail link (it currently has no shops) or why the northern end of Aldersgate Street running into Goswell Road is not identified as a retail link (is this a mistake on the map?). This last street has many shops on it that are of direct importance to a residential area (in line with policy R3).

*Policy R3 Ground floor retail provision elsewhere in the City*

Item 2. We welcome the resistance to the loss of A1 units that meet residential needs.

**5.3 Culture visitors and the night time economy**

***Strategic Policy S6***

Please add to the 4<sup>th</sup> bullet point – refusing new hotels where they would adversely affect residential amenity.



5<sup>th</sup> bullet point. Please strengthen this point to state that the City will resist vibrant evening and night time activities where they would adversely impact on residents. Management will not always be adequate to mitigate the effects. Where permission is given it should be made clear in conditions that it is the venue's operators who will be held accountable for managing night time activity and dispersal to minimise disturbance. But it should not be left to those operators to specify the conditions.

*Policy C2 Provision of visitor facilities*

5.3.11 Please add that these facilities must be capable of being accommodated without detracting from residential amenity.

We are particularly concerned that the Culture Mile should not turn the Barbican Estate into a version of the South Bank – constantly crowded with visitors and food outlets catering for them.

*Policy C3 Hotels*

Add to bullet point 4 that entrances/exits, delivery and drop off points should be sited away from residences where hotels are placed in residential areas. Where this is not possible hotels will be refused.

(See *City of London Hotel Study*. Market Strategy and Policy Advice for New Hotel Development in the City of London, June 2009.)

*Policy C4 Evening and Night time economy*

Please add to this policy that the City will take account of the cumulative impact of evening and night time venues. Planning restrictions on siting of such venues are more protective than licensing measures.

*Policy C5 Public Art*

Please add that specific attention will be paid to illuminated artworks, to ensure they do not impose light pollution onto neighbouring residences.

We are pleased there is a group to advise on artistic merit and siting and support the fact that time limits may be imposed on an artwork staying in place.

## **5.4 Smart infrastructure and Utilities**

### ***Strategic Policy S7***

We support this policy and in particular that infrastructure should not be allowed to be built where it will have adverse impacts on visual amenity, character and appearance of the City and its heritage assets. Nor should it impact on residential amenity.

*Policy S11 Infrastructure provision and connection*

Developers should be required to install fibre optic and other communications infrastructure into new residential developments.

*Policy S13 Pipe subways*

The City should itself develop a policy to work with infrastructure suppliers and developers to extend the Pipe subway network within the City.

## **6.1 Design**

### ***Strategic Policy S8***

We welcome this strategy.

However, we think it could usefully include a caveat in Item 6, so that it reads (additions in bold): **“Where appropriate, delivers street level building frontages so they are active, public facing, useable, permeable, interesting, well detailed and appropriately lit (but respecting the heritage of the buildings and their use), delivering suitable levels of passive surveillance**

The reason for this is that the architecture and conception of some heritage City buildings is not appropriate for active permeable frontages. This applies to heritage assets from all ages – from the Tower of London, the Inns of Court, and St Paul’s to the Barbican Estate. We are anxious that the City should appreciate that the Barbican’s design is deliberately inward looking, to protect residential amenity and that installing permeable active frontages will spoil the design and the purpose.

6.1.7 As mentioned in section 2 of our response, the City needs a mechanism to ensure that all development should meet the highest standards of urban design; we suggest a design panel.

#### *Policy D2 New development*

6.1.27 We particularly welcome that plant and building services equipment are fully screened from view. This should also include that plant noise and air intakes and emissions should not be apparent at street level or next to residences.

#### *Policy D5 Terraces and viewing galleries*

We welcome the policy on roof terraces but would like it strengthened to prevent disturbance to residents. We would like to see the replacement of “significantly adverse” impacts with “adverse impacts” and to specifically mention noise disturbance. Experience in the Barbican with office terraces right across the street from flats has shown that active use of terraces by office workers can cause major disturbances to residents in the evenings.

#### *Policy D7 Advertisements*

6.1.56 We welcome the banning of A boards on pavements and would like to see better enforcement of pavement clutter.

#### *Policy D8 Daylight and sunlight*

“Noticeably” to “unacceptable levels” are subjective measures, and residents have not found that subjective assessments have protected levels of daylight and sunlight in the past.

We welcome the commitment in 6.1.10 to take account of the cumulative effect of development proposals and to take account of existing features such as the existence of balconies that limit the amount of daylight and sunlight a building can receive.

However, as outlined in section 2 of our response, we would like to see some criteria for assessing cumulative impact and a resistance to simply allowing developments that impose “minor” reductions in daylight or sunlight on adjacent residences. It has been a willingness in the past to allow successive developments to reduce the daylight and sunlight reaching residential flats such that has resulted over time in substantial losses of daylight and sunlight to many Barbican flats.

We particularly welcome the statement in 6.1.60 that “Where appropriate, the City Corporation will take into account unusual existing circumstances, such as... the presence of balconies or other external features, which limit the daylight and sunlight that a building can receive.”

Because of a failure to take account of the Barbican’s balconies in the past many flats have experienced substantial losses of daylight and sunlight from adjacent developments.

### *Policy D9 Lighting*

Item 2. We would like to see more on how this policy would work. We would like to see the City state that it will require developers to install automatic switches to switch off lights between 8 am and 7 pm where offices overlooking residences, and to ensure that such systems are commissioned and operated. Where lighting is needed for late night working the City should require these building operators to install full density blinds and to maintain and operate them, so there is no light spillage between 7pm and 8 am.

We would also like to see restrictions on the lighting that contractors may use on their construction sites. These are often the brightest lights in the City at night and are well beyond what is needed to safety.

## **6.2 Vehicular Transport and Servicing**

### ***Strategic Policy S9***

#### *Policy VT2 Freight and servicing*

Item 4. It would be helpful if this policy could explicitly specify the existing prohibition on deliveries in residential areas between 11 pm and 7 am on weekdays.

Indeed, it would be welcome if the policy could be redrawn to specify no deliveries in residential areas between 11 pm and 8am on weekdays or between 6pm and 9am on weekends and public holidays.

6.2.24 We particularly welcome the requirement for service areas to provide enough space for all vehicles to leave and enter in forward gear.

#### *Policy VT5 Aviation landing facilities*

We support the prohibition of helipads in the City and would welcome discouragement of helicopters flying over the City, except for emergency/public services purposes. Static helicopters hovering for extended periods are exceptionally disturbing.

## **6.3 Walking Cycling and Healthy Streets**

### ***Strategic Policy S10***

#### *Policy W1 Pedestrian movement*

We welcome the commitment to maintain existing pedestrian routes on the upper level walkways around the Barbican and London Wall.

Indeed, we would support further extensions of the Highwalks into surrounding parts of the City

However, we would not want to see the creation of new pedestrian routes at ground level within the Barbican Estate. This would damage the grade II\* listed landscape of the estate and adversely affect residential amenity. The current highwalks are well designed to minimise disturbance within the flats.

6.3.13

We would welcome some restriction on pavement drinking outside public houses where it impedes pedestrian movement – and in some cases forces pedestrians out in the vehicle carriageway.

## **6.4 Historic environment**

### ***Strategic Policy S11***

*Policy HE1*

We support this policy and the reasons for it outlined in 6.4.9-17.

**6.5 Tall buildings and protected views**

***Strategic Policy 12***

We welcome the identification of locations where tall buildings are not appropriate and the fact that the map has been updated to include recently designated conservation areas.

We understand that the fact that an area is not shown as an area inappropriate for tall buildings on the map in figure 19 does not mean that it is deemed “appropriate”. That will depend on the individual proposal and how it fits with relevant policies. We suggest that that fact should be made clearer in the plans.

Specifically, we have concerns about

- the west side of Aldersgate Street,
- Silk Street

- an area bounded by Beech Street, Golden Lane, and the Golden Lane estate

- an area to the south of the Barbican estate bounded by Aldersgate Street, the Museum of London roundabout and London Wall

as appropriate areas for tall buildings.

We would argue that these sites would be inappropriate for tall buildings, for reasons in line with the major strategic policies S3 and S11:

1. In all cases the fairly small patches of land lie between conservation areas, and tall buildings would damage the settings of the conservation areas.

2. In all cases the surrounding buildings are not tall buildings (with the exception of the three Barbican towers), but have traditionally – and as a matter of policy (cf developments in Aldersgate Street) – remained at a low or medium height.

3. All three sites are bounded by residential flats. Tall buildings next to them will reduce their daylight and sunlight levels and risk other threats to residential amenity (light spillage, noise from terraces). Indeed, the intention in this plan to take account of cumulative effects should ensure that tall buildings are not built on these sites – because the Barbican flats adjacent to these sites have all been affected by a diminution of daylight and sunlight by previous developments. Moreover, the clearest way to protect residential amenity is by designating these areas as unsuitable for tall buildings.

Given that most of the projected office space in the life of this plan is already under construction, there would seem to be no need for tall buildings in the above areas.

Given too that the settings of listed buildings and conservation areas should be taken into account in considering applications, and the designation of “residential areas” we would urge the City to be bolder and indicate on the map areas where it is highly unlikely that applications for tall buildings would succeed.

The eastern side of the Barbican estate has been progressively walled in by tall buildings – to the detriment of both residential amenity and the setting of the listed estate (now a conservation area).

## **6.6 Open spaces and Green infrastructure**

### ***Strategic policy S14***

We welcome this policy and its associated policies OS1-3.

However, we would like the plan to specify that where residential amenity may be affected by terraces, extensive green roofs (with no or limited access to people) will be preferred over intensive ones. In any case, for the same given area, extensive green roofs are likely to deliver a higher UGF than intensive ones.

## **6.7 Climate Resilience and Flood Risk**

### ***Strategic policy S15***

We support his policy and its associated policies CR1-4.

## **6.8 Circular economy and waste**

### ***Strategic objective S16***

We welcome this policy and its associated policies CEW1-3.

## **5. Key Areas of Change**

### **7.8 Smithfield and Barbican Key Area of Change**

#### ***Strategic Policy S23***

We welcome that the area has a specific plan as an area of change. However, we worry about the variety of types of development that are to be encouraged, the ill defined nature of the Culture Mile, and about the protection of residential amenity within that.

We support the retention of pedestrian permeability through the Barbican, especially via the Highwalks. However, we do not support the insertion of new pedestrian routes, especially at ground level. This would spoil the inherent character of this listed estate (designed as a residential area and inward looking) and risk residential amenity.

We support the improvement of Beech Street and reduction of air pollution.

#### ***Strategic Policy 24 Culture Mile Implementation***

The Culture Mile needs a stronger definition and commitment to compete with offices and provide a significantly better environment for the western edge of the Barbican, as well as future proofing against the likelihood that Smithfield will itself become a target for massive office development. Such a move would fit with the proposals as it supports the concept of an improved economy through tourism.

Barbican residents broadly support the Culture Mile policies. However, there should not be a presumption in favour of all culture related development. It is not sufficient (as in Policy SB1) simply to "Consider the impact of noise-generating uses ... on residents ... and require mitigation measures where appropriate". This is inconsistent with policy H3, which asserts that "existing residents will be protected by resisting uses which would cause unacceptable noise disturbance, fumes and smells and vehicle or pedestrian movements likely to cause undue disturbance".

If the Centre for Music is built, it would be inappropriate to hem it in with tall commercial buildings to the north of it on Aldersgate Street and east of it on the Bastion House site (as allowed by the tall buildings policy Strategic Policy 12 and figure 19).

If, on the other hand, the Centre for Music is not built, the available site abuts a conservation area and a residential area. Overdevelopment is a real risk, and what development there is needs to fit in with the nature of this key area of change and the Culture Mile. The logic would be to develop this site for residential use.

#### *Policy SB1 Culture Mile Impact*

We welcome the statement in this policy that the City will protect the amenity of residents, the integrity of historic and listed buildings and structures. But, since Strategic Policy S23 states (2<sup>nd</sup> item) “ensuring the retention and improvement of pedestrian permeability and connectivity through large sites such as Smithfield Market, Golden Lane and Barbican while preserving privacy security and noise abatement for residents and businesses” we do think you need to spell out how that can be done for Golden Lane and Barbican (which are residential areas and are particularly sensitive to noise and privacy issues).

At the moment it sounds as though the Plan wants to have its cake and eat it – and we seriously doubt that both aims can be met. We are not saying that pedestrian routes through the estate should not be used – or not used by more people than use them at the moment – but new routes would damage the design of the estate, and considerably more pedestrians, particularly in the evening and night, seriously threaten residential amenity. It is not appropriate to allow the Barbican Estate to become like the South Bank in terms of crowds of residents and street entertainment.

As stated above, we would like to see a stronger wording to prevent noise generating activities, particularly night time activities – ie to refuse applications rather than simply mitigating their effects.

#### **Strategic Policy S25 Smithfield**

Plans for Smithfield should

- a) Respect the architecture
- b) Be sensitive to the fact that is near the City’s biggest residential areas
- c) Be sensitive to its position in the Culture Mile. Do we really need another shopping area or a concentration of night time economy?
- d) Boost the Culture Mile.

#### **A suggestion for the Smithfield site**

The local plan sets out the future for a thriving economy with the City, recognised for its world class cultural and creative facilities and seeing increasing tourists. However, compared with other major tourist attractions the Culture Mile does not have the draw of Exhibition Road, or the status of St Paul’s or The British Museum. Indeed, popular tourist routing directs tourists from St Paul’s along the river to Westminster. There is an opportunity to redress this if the Smithfield Market buildings took on a cultural significance to boost the attraction of the proposed Museum of London site. If the Culture Mile is to succeed this key building needs to take on a significant interest.

An involvement as a venue to work in combination with several of the current London Museums to showcase many of the exhibits they currently hold in store and in remote sites could create a significant lift to the plans for the area. Significantly, the introduction of the Crossrail service also provides one stop links to Tottenham Court Road (British Museum), two stop links to Bond Street (Shopping) and three stop links to Canary Wharf for the Greenwich museums.

Such a move would also fit with residential amenities, as most museum activity is focussed on daytime activity and the pattern of tourist travel is likely to be between Smithfield and St Paul's or Smithfield to other London attractions via Crossrail.

There are also a number of museums with overflow issues, whether it is the London Transport museum - showcasing within the former railway tunnels under Smithfield; The British Museum; or the Museums along Exhibition Road.

The Culture Mile needs a core and a series of attractions if it is not to dissipate and disappoint. The current Local Plan needs an associated drive to achieve a vision which is not just street entertainment.

### **8.1 Planning contributions** ***Strategic Policy S27***

*Policy PC1 Viability appraisals*

We welcome this policy.

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