

Do tall buildings work in London?

Planning and Regeneration Committee

April 2025

London Assembly Planning and Regeneration Committee

The Planning and Regeneration Committee examines and reports on matters relating to spatial development, planning and regeneration in London and leads scrutiny of the Mayor's Spatial Development Strategy (the London Plan). The Committee also has lead responsibility for scrutiny of the Old Oak and Park Royal Development Corporation.

To read more about our work, [please visit our website](#).

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About this investigation

In January-February 2025, the Planning and Regeneration Committee carried out an investigation into tall residential buildings and their impact on London. We looked at:

- What is known about the demographics of residents in tall buildings and who is being served by this building type
- The views and experiences of residents in tall buildings in London
- The environmental impact of tall, residential buildings
- How tall building policy should be considered in the next London Plan

Who we heard from

We held two meetings, with the following:



- Jules Pipe CBE (Deputy Mayor for Planning, Regeneration and the Fire Service)
- Alan Smithies (Principal Strategic Planner, GLA)
- Michael Forrester (Head of Development Management, London Borough of Lewisham)
- Michael Ritchie (Place Shaping Manager, London Borough of Tower Hamlets)
- Jessica Potter (Urban Design Team Leader, Old Kent Road Regeneration, London Borough of Southwark)
- Colin Wilson (Assistant Director of Strategic Development and Old Kent Road Regeneration, London Borough of Southwark)
- Kath Scanlon (Distinguished Policy Fellow and Deputy Director, LSE London)
- Pat Turnbull (Regional Delegate, London Tenants Federation)
- Stuart Baillie (Partner and Head of Planning, Knight Frank)
- Russell Whitehead (Director and United Kingdom Buildings Division Leader, Robert Bird Group)
- Chris Edgington (Associate Director, Building Services, ARUP)



We also held a roundtable discussion with New London Architecture's (NLA) Tall Building and Housing panels.



...and received responses to our call for evidence from the following organisations:

- London Forum of Amenity and Civic Societies
- LSE London
- Building Stock Laboratory, Energy Institute, University College London
- Just Space
- Old Oak Neighbourhood Forum
- Ealing Matters
- Tonic Staff and Residents
- Friary Park Preservation Group
- London Borough of Tower Hamlets

We are grateful to all who contributed to this investigation.

Executive summary [1]

The members of this Committee hold a range of views on the merits of tall residential buildings in London. Some see them as an inevitability in the need to deliver the housing to help ameliorate the housing crisis. Others fear tall residential buildings are not appropriate on the grounds they do not meet the needs of a sufficient range of Londoners – particularly families. This is compounded by additional concerns around the lifetime costs and environmental impact of tall buildings.

What we are united on is that, if tall buildings are necessary, they must be built to the highest standards for those who choose to live there, and the people who have no option but to live there. That they should contribute positively to the overall public realm. And that they deliver housing that meets the variety of needs of Londoners at different stages in their life – whether residents are students, young professionals and growing families, and whether they are young, older, or disabled.

Executive summary [2]

Currently, we fear that the tall residential buildings being constructed in London are not always delivering against these criteria. We are also concerned that fundamentally there is an absence of definitive analysis of what a successful tall building looks like. Accordingly, as part of the GLA's work to prepare a new London Plan, we want to see the GLA carry out assessments of:

- what mixture of housing typologies London needs as part of its Strategic Housing Market Assessment (SHMA).
- how tall buildings are driving increasing land values as part of its Strategic Housing Land Availability Assessment (SHLAA).
- the whole-life carbon impacts of tall buildings and how they fit with sustainability goals of the London Plan.



Recommendations



Recommendation 1:

- The GLA should conduct a housing typology assessment to understand not just the overall demand, but also what mixture of housing typologies London needs as part of its Strategic Housing Market Assessment (SHMA).
- The GLA should conduct an assessment of how tall buildings are driving increasing land values as part of its Strategic Housing Land Availability Assessment (SHLAA).
- The GLA should carry out assessments of the whole-life carbon impacts of tall buildings and how they fit with sustainability goals of the London Plan.



Recommendation 2: The GLA should produce guidance setting housing design standards specifically for tall residential buildings as part of the next London Plan. These should recognise the distinct requirements of tall residential buildings and the need for more living space required as standard.

Recommendations

- 3**  **Recommendation 3:** Given tall buildings' significant impact on place and space in London, the GLA has an important role in helping to build the evidence base for where and how tall buildings are or are not appropriate, and their lifetime costs. This should involve developing guidance linked to London Plan Policy D9 on impacts:
- Including a requirement for all permissions with more than 6 storeys or 18 metres to have a post-occupancy evaluation (POE).
 - Providing a template alongside best practice guidance for how this information should be gathered.
 - Hosting an open access post-occupancy evaluation databank, which boroughs and other interested parties can use for research purposes.
- 4**  **Recommendation 4:** The GLA should work with London Councils to convene an 'environment and sustainability in planning' community of practice to enable Boroughs to share knowledge and expertise on reviewing these assessments and provide external expertise and resources for boroughs to draw upon.
- 5**  **Recommendation 5:** The GLA should share any findings that emerge from the whole-life carbon evidence base with the Planning and Regeneration Committee with a view to including these benchmarks within the next London Plan as appropriate.
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CHAPTER ONE

INTRODUCTION

Policy D9

Policy D9 of the London Plan sets out the Mayor's vision for tall buildings in London.

A: Definition



The London Plan defines tall buildings as:

“Based on local context, **Development Plans should define what is considered a tall building for specific localities**, the height of which will vary between and within different parts of London but should not be less than **6 storeys or 18 metres** measured from ground to the floor level of the uppermost storey.”

B: Locations



The London Plan states that Boroughs should determine the locations where tall buildings are appropriate. These **locations and appropriate heights should be identified on maps in Development Plans** and tall buildings should **only** be developed in these locations.

C: Impacts



There are 4 categories of impacts:

1. **Visual impacts:** spatial hierarchy, architectural quality and light pollution.
2. **Functional impacts:** the provision of jobs, the capacity of local transport networks and building maintenance.
3. **Environmental impacts:** conditions around the building, air movement, and the noise created by the building.
4. **Cumulative impacts:** the combined impacts of all the above categories.

D: Public Access

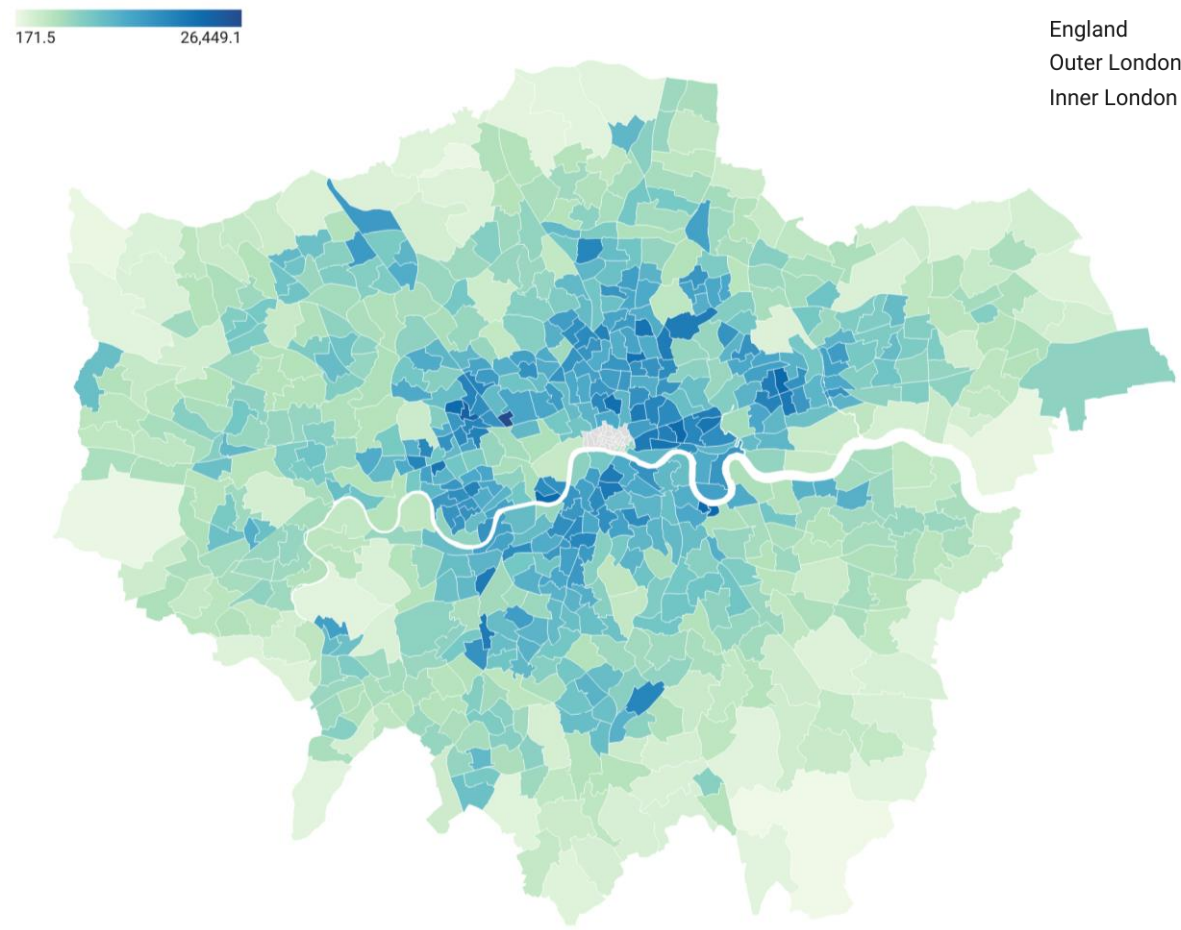


The London Plan states that

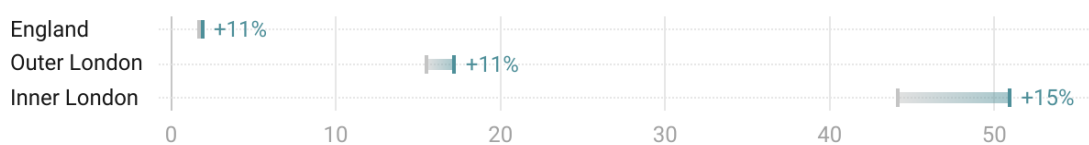
“Free to enter publicly-accessible areas should be incorporated into tall buildings where appropriate, **particularly more prominent tall buildings** where they should normally be located at the top of the building to **afford wider views across London.**”

Density in London

Population by ward (2021 Census)



Percentage increase in dwellings per hectare, 2011-2023



Housing density is higher in London than other major cities. Across London, there were 24.1 dwellings per hectare in 2023. This is around twice the density of the West Midlands (13.35), Merseyside (10.29) Greater Manchester (9.94) and Tyne and Wear (9.87) metropolitan areas. However, it is less than half the density of Paris, at roughly 63 dwellings per hectare.¹

Dwelling density in inner London is now at 50.99 dwellings per hectare, while in outer London it is 17.26. Over the last 12 years, dwelling density has risen at a faster rate in inner London. The increase in outer London has matched that of England as a whole.

Source: ONS, Census 2021, Population density, published November 2022

1. Paris has about 252 residents per hectare, which translates to roughly 63 dwellings per hectare, assuming an average household size of 4. [La Grande Conversation](#), 2023

Building heights vary across London (1)

The Committee heard that the London Plan directs tall buildings towards certain locations, such as town centres, 'opportunity areas', and areas well served by public transport.

“ ...the 2004 London Plan has influenced all our borough plans and that basically said tall buildings should go in opportunity areas, and town centres, and in accessible locations. **”**

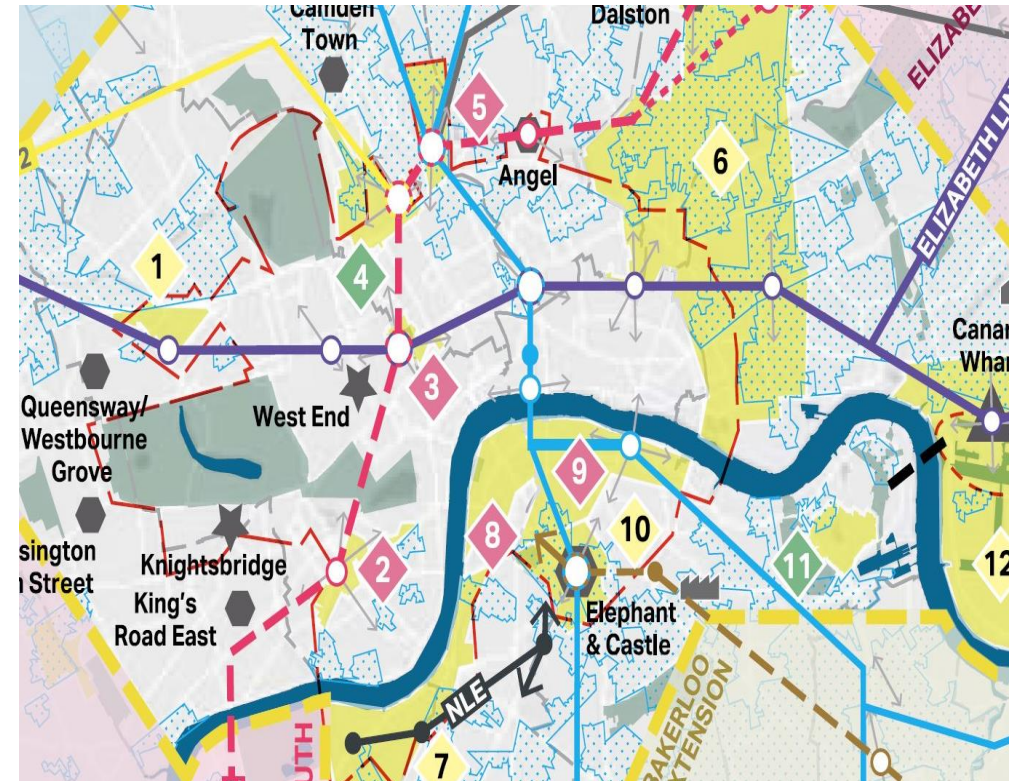
Colin Wilson, Southwark

Planning Committee meeting, February 2025

“ Similar to other boroughs, in the past we have directed tall buildings towards specific areas where there are opportunity areas or major centres. **”**

Michael Ritchie, Tower Hamlets

Planning Committee meeting, February 2025



Section of the map of opportunity areas for central London, London Plan 2021, page 59.

Building heights vary across London (2)



“ ...it makes perfect sense that if you are going to build in height, if you can build intensity, the place to do it is at the point of access to infrastructure.

We are going to have to expand infrastructure at the same time but what we do not want to have to do is create multiple new underground railways that could have been avoided by building densely at the point of access to one. ”

Russell Whitehead, Robert Bird Group
[Planning Committee meeting](#), January 2025

“ Where there are good transport nodes, the plan does seek to densify around those to avoid car-based development and that there are the amenities [such as] shops, entertainment, etc nearby.

‘Compact towns and cities are better than urban sprawl’ is the theme of the approach ”

Jules Pipe CBE, GLA
[Planning Committee meeting](#), February 2025

Place, space and visual appeal

Tall buildings have a significant visual impact on London. The Committee heard that many local communities are concerned about sightlines being blocked, glare and overshadowing and the creation of dangerous wind tunnels:

“ [Attendees of a 2010 conference for London Tenants Federation] complained of the growth of tall and large buildings in London, particularly in exclusive developments beside the river, blocking sightlines for existing residents, producing glare and overshadowing and deflecting strong wind down to the ground level, making it dangerous for passersby, particularly children, elderly and disabled people. They argued that there is a need for buildings that are both environmentally and socially friendly, respectful of existing neighbourhoods and communities. ”

Pat Turnbull, London Tenants Federation
Planning Committee meeting, January 2025



The growth of private development



The tall buildings being constructed today differ greatly from those in the past. Many tall buildings constructed during the 20th century were part of municipal housing programmes aimed primarily at poorer communities. These programmes led to the creation of social housing estates, many of which included “towers” of around 20 storeys, and “slab blocks” of around 10 storeys. By contrast, the Committee heard from guests that many tall buildings constructed today are built by private developers, for commercial office use, market sale or market rent.² Recent data show continued strong demand for Grade-A commercial office space.³

Between 1991 and 2023, privately rented dwellings increased from 12.7 per cent of London’s total dwelling stock to 31.1 per cent. During this same period, the proportion of dwellings rented from local authorities dropped from 24.1 per cent to 10.3 per cent.⁴ This shows a market wide shift away from social to private rent that is also reflected in those who construct and own tall buildings.

“...but most of what is being built at the moment is being built by private developers who sell the market units to individual purchasers, and then the affordable housing is normally bought by a housing association.”

Dr Kath Scanlon, LSE

Planning Committee meeting, January 2025

² Tall Residential Buildings Research Group, [What is the future of high-rise housing? Examining the long-term social and financial impacts of residential towers](#) (2023).

³ Ministry of Housing, Communities and Local Government, [Live tables on dwelling stock \(including vacants\)](#), Table 109.

⁴ New London Architecture, [London's Growing Up: A Decade of Building Tall](#) (2024) page 8.

CHAPTER TWO

MEETING LONDON'S HOUSING NEED

Providing the housing that London needs

There is a huge demand for housing in London and an impetus from central government to build homes. The Mayor's London Plan sets a target of 52,000 homes per year, whilst the Government's most recent Standard Method assessment states that London has a housing need of 87,992 per year.

Some see residential tall buildings as playing a key role in providing the necessary growth in housing for London. But it is important that the types of homes that get built are those that meet the needs of Londoners. We heard concerns in this investigation that flats in new tall buildings were too expensive for those who need housing the most. Many contributors, though not all, raised concerns about the suitability of tall buildings for families.

It is important to provide a mix of housing types and tenures that will meet the needs of all Londoners.

“ It is part of solving the housing needs of London. It is never going to solve all of it. ”

Stuart Baillie, Knight Frank
[Planning Committee meeting](#), January 2025

“ ...the recent tall buildings are not meeting the needs of most Londoners. They are too expensive. For example, I live near the Olympic Park site, and it just seems there is a never-ending building programme of extremely tall buildings, many of them residential, close-packed together but too expensive for most Londoners to live in. ”

Pat Turnbull, London Tenants Federation
[Planning Committee meeting](#), January 2025

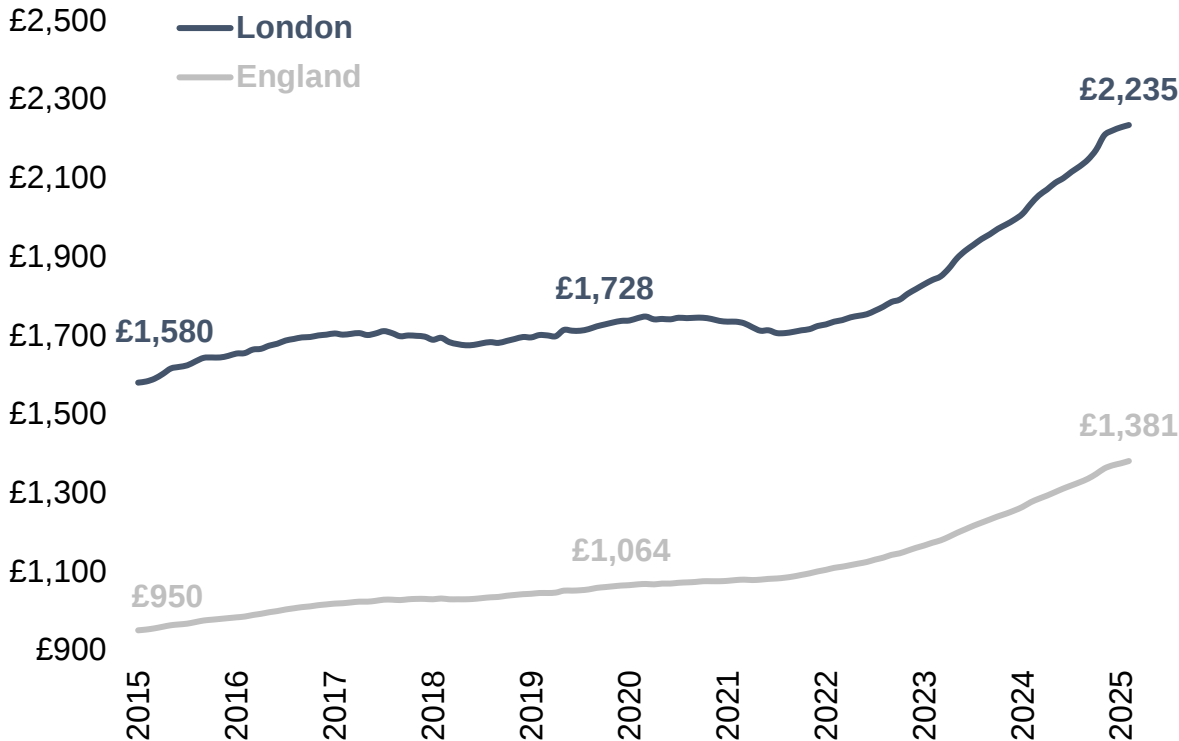
“ London needs more housing affordable to rent (privately or publicly) or to buy, and a higher proportion of these need to be family friendly. Simply focusing on the number of units is not an appropriate response to that crisis: adding more stock won't necessarily bring prices down. ”

Just Space
[Call for Evidence Response](#), March 2025

Rents in tall buildings

Private rents have risen across the country in the past ten years, with a sharper increase in London specifically over the past four years.

Average Private Rent in London and England (2015-2025)



Source: ONS, Private rent and house prices, UK: March 2025, (2025)

“ London does not ‘need’ luxury accommodation but desperately needs affordable housing. ”

Resident of Islington
[Call for Evidence Response](#), March 2025

“ The large amount of residential development over the past 25 years, outpacing the demographic increase, has not brought this any closer, with prices rising 240% over the period. The housing, in particular the tall building product, could be considered to have exacerbated the housing crisis. Many tall buildings contain the 75,000 vacant homes estimated in the capital. ”

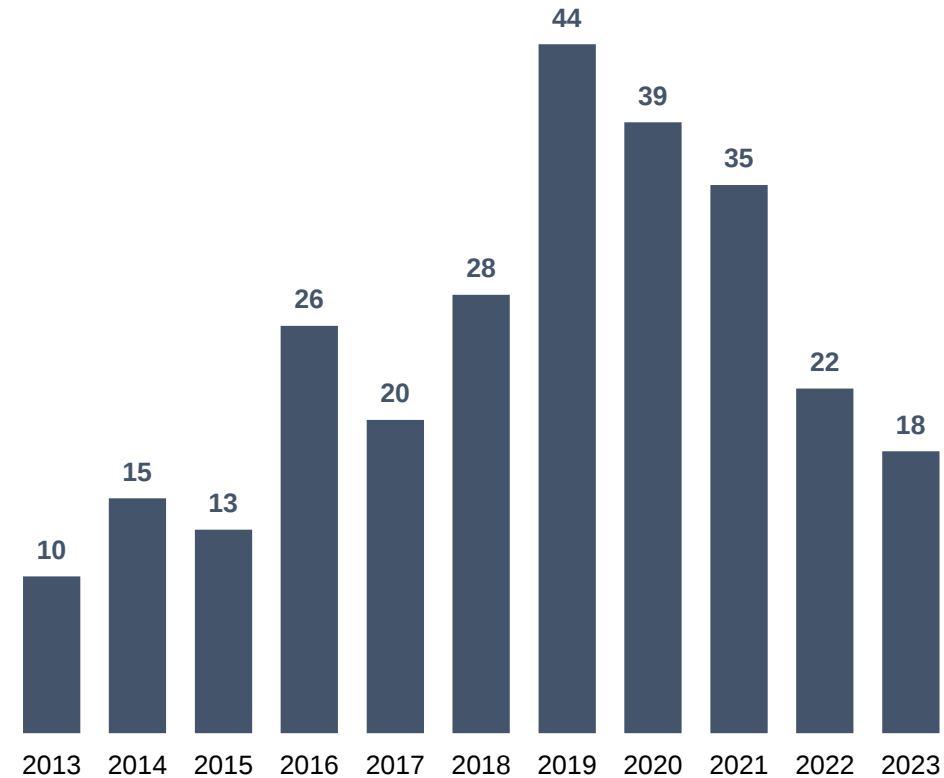
Just Space
[Call for Evidence Response](#), March 2025

“ What we are talking about, in contrast, is the rapid growth of residential private market tower blocks in the past 20 years in London, which are beyond the pocket of the people who need council housing, which is the great majority of people who are without housing at the moment. ”

Pat Turnbull, London Tenants Federation
[Planning Committee meeting](#), January 2025

The slowdown in tall building delivery

Number of Tall Building Completions in London (20 storeys or taller)



Source: NLA, London's Growing Up: A Decade of Building Tall (2024)

Recent years have seen the construction of residential tall buildings start to slow down as a combination of higher interest rates, construction costs and new safety regulations have reduced developer appetite.

Stuart Baillie, Knight Frank, told the Committee that London Plan design and other policies cumulatively put additional pressure on build cost and affordable housing viability, and that late-stage review mechanisms dampen investor interest.⁵

“...the residential market is incredibly difficult. It is at its worst that it has been in 25 years of me working in professional planning in London. The delivery of housing has certainly dropped off significantly recently. There is a viability challenge to these residential tall buildings, but there is a viability challenge to any residential development in London.”

Stuart Baillie, Knight Frank
Planning Committee meeting, January 2025

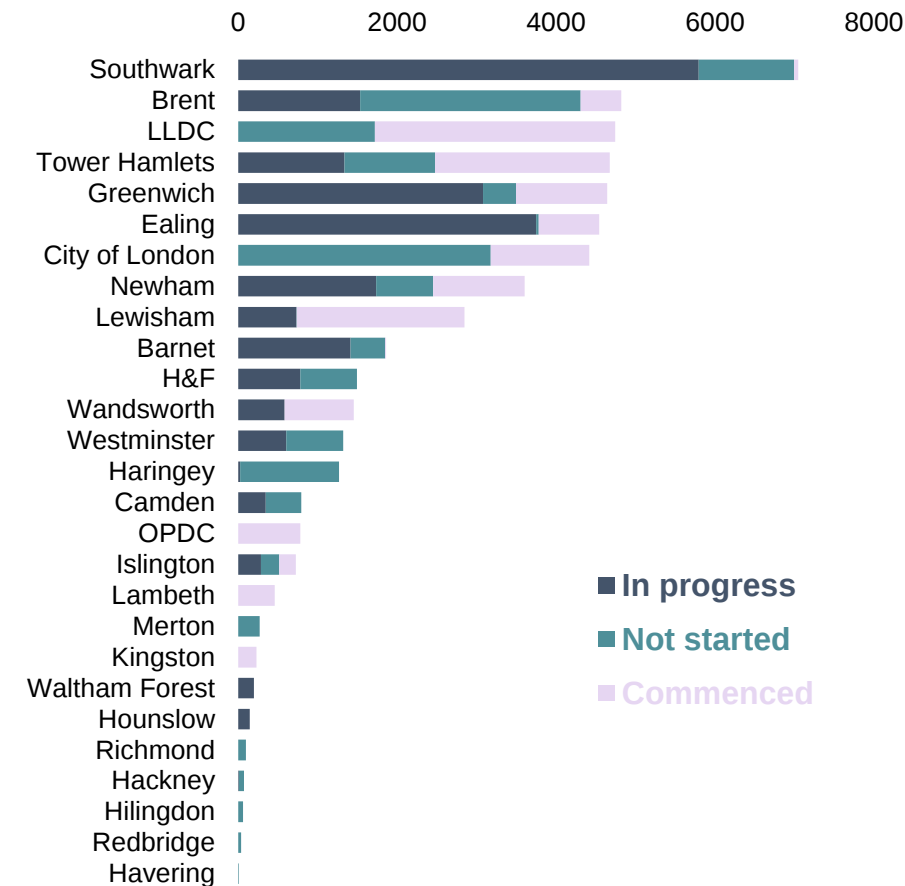
“In the short term, it [requiring a second stair core / second staircase] is stalling things and there are some major sites across London that are currently stalled. That is both about viability but also there are question marks about lifts, even once the viability issues are addressed.”

Jules Pipe CBE, GLA
Planning Committee meeting, February 2025

⁵ Stuart Baillie, [Market cools for tall buildings but will the temperature rise high again?](#), June 2024

Purpose Built Student Accommodation

Live planning applications proposing PBSA bedrooms by number of rooms (3 April 2025)



Source: London Datastore, [Live PBSA units](#), Accessed 3 April 2025

Whilst overall construction of residential tall buildings is slowing down, applications for Purpose Built Student Accommodation (PBSA) and co-living is increasing. We heard from guests that these formats are seen to work well at scale and as such can more easily attract funding.⁶ Boroughs may be building these tall buildings in the expectation that it will free up family homes. Some guests raised that there is currently a lack of evidence to prove that this will work.

“ You look at the example of purpose-built student accommodation (PBSA); part of the rationale for that is that it should release family-sized homes that are being used for student accommodation currently in the rental sector to become family-sized homes again ”

Stuart Baillie, Knight Frank
Planning Committee meeting, January 2025

“ ...we are experiencing large numbers of proposals for student accommodation and co-living. Part of the rationale behind that is people will say to us, “If we provide that kind of accommodation for younger people or people that are less maybe family oriented or whatever in tall buildings, then you are freeing up the lower-rise houses for the families”. I can see that argument. There is not enough evidence to say at the moment that [this] is definitely what is happening. We need to really draw down to that and understand how that is playing out. ”

Michael Ritchie, Tower Hamlets
Planning Committee meeting, February 2025

⁶ Stuart Baillie, [Market cools for tall buildings but will the temperature rise high again?](#), June 2024

Rising land values encourage taller buildings



A combination of factors, including high build costs, rising land values, and Section 106 contributions⁷ encourage taller development.

“ Sometimes with these developments, the land value itself to acquire the sites and build just simply pushes the height up because the developer needs to get a minimum of 20 or 30 units on that site to make the returns, to make it viable to deliver the development. ”

Stuart Baillie, Knight Frank
Planning Committee meeting, January 2025

“ If things were more viable than they were, if the land had been cheaper and if we were not so reliant on Section 106 [Town and Country Planning Act 1990] to provide affordable housing, generally buildings would be a lot lower in London. ”

Jules Pipe CBE, GLA
Planning Committee meeting, February 2025

⁷ Local Planning Authorities can negotiate ‘Section 106 agreements’ with developers, requiring them to deliver certain ‘planning obligations’ such as paying for affordable housing or maintaining /providing infrastructure in an area (for example, to fund more school places or a new GP surgery). [House of Commons Library, 2024](#)

What homes are needed in London?



We know how many homes are needed in London. An assessment of the **types** of homes that are needed in London will help to make sure that the needs and wants of Londoners are balanced alongside market forces that are directing high-density developments.

Flats in tall buildings may not work for all people and should not be assumed to be the primary way of resolving the crisis.

1



Recommendation 1:

- The GLA should conduct a housing typology assessment to understand not just the overall demand, but also what mixture of housing typologies London needs as part of its Strategic Housing Market Assessment (SHMA).
- The GLA should conduct an assessment of how tall buildings are driving increasing land values as part of its Strategic Housing Land Availability Assessment (SHLAA).
- The GLA should carry out assessments of the whole-life carbon impacts of tall buildings and how they fit with sustainability goals of the London Plan.

CHAPTER THREE

WHAT DO WE KNOW ABOUT 'HIGH RISE' LIVING?

Family friendliness

Some tall buildings do not provide the types of amenities needed by families. Dr Kath Scanlon's research on London highlighted that many residents feel that they have too little storage, something that impacts families who may need to store buggies and other equipment. A study by the London Borough of Tower Hamlets found that 40 per cent of residents in high density buildings feel they do not have enough storage space. There are also concerns about the general suitability of tall buildings for families, especially on higher floor levels, as well as lack of access to suitable amenity and play space.

“

There was very limited storage for the kinds of things that parents of small children need to have in the house, [such as] pushchairs, cots, and all the accoutrements of childhood, and there was nowhere to put them. Secondly, the layout of the flats themselves is very inflexible. That is just a characteristic of high-density construction generally, as compared to the Victorian houses that make up a lot of our housing stock, where you can knock through a wall or build an extension or reconfigure the space as your family needs change.

Dr Kath Scanlon, LSE

[Planning Committee meeting](#), January 2025

“

...some play space you can see is quite pathetic really. It is a couple of rocks and that is your engagement as a child. We have really pushed developers, housing associations and our own housing department to provide meaningful and imaginative play space. There has been a whole pushback against that, I have to say.

”

Colin Wilson, Southwark

[Planning Committee meeting](#), February 2025

Place and space

Due to the lack of private outdoor space in many tall buildings, they need to include public and play space within their developments, or otherwise contribute positively to the overall public realm. The Committee is concerned that tall residential buildings being constructed today are meeting this criteria in only a minimal way, which may be storing up problems for the future.



“ *Place-making and curation of place always makes for better places, and there always should be a guiding hand - whether it is a master plan that the council has led on, or whether it is a big regeneration site and then it is the developer, or a developer jointly with the council. Yes, that kind of guiding, curating hand to deliver good place making invariably ends up with better places than simply ad hoc development... if you have a single-point building, for example, other than the roof, where is the play space going?* ”

Jules Pipe CBE, GLA

[Planning Committee meeting](#), February 2025

“ *They [residential tall buildings] are driving issues of unaffordability, while creating areas of exclusion where communities do not thrive. Planned clusters of tall buildings - like those at the Vauxhall/Nine Elms/Battersea (VNEB) Opportunity Area - are notorious as creating fundamentally unpleasant environments with minimal community benefit, and with low occupancy rates.* ”

Just Space

[Call for Evidence Response](#), March 2025

Accessible play space

The policy requirements for play space are set out within London Plan Policy S4. This sets a minimum requirement for 10 square feet of play space per child in development. The Committee is concerned that the requirement for accessible play space too often loses out in the balance of considerations when planning permissions are given for tall buildings. That tall buildings are not being built with suitable play space, as developers either pay Section 106 contributions for off-site play space or unsuitable play spaces on the roof of a tower.

“ *The play space is either going on the roof, which is increasingly common, or it is a payment to an off-site, existing space. There is not another option other than to say the building does not happen, or a much smaller building [is created]. Even then, in the real world it is just not practical on every single site, so it ends up coming down to a payment to observe the spirit of investment in children’s play space, rather than being able to manifest an extra piece of land with green space, grass, and swings.* ”

Jules Pipe CBE, GLA
Planning Committee meeting, February 2025



“ *Some of them do, as you say, have play spaces on the roof. It is not very satisfactory and, again, a lot of parents would not allow their children to go to the roof unsupervised. They can be very windy and exposed and so on, but many of these new developments do have nice play spaces.* ”

Dr Kath Scanlon, LSE
Planning Committee meeting, January 2025

A 'looser fit' for tall buildings

The current London Plan includes generic housing design standards that are applicable to all housing types. The Committee believes that due to the unique opportunities and challenges presented by residential tall buildings, they should have their own design guidance in the next London Plan. For example, Tower Hamlets, the London Borough with the most tall buildings, prepared its own separate guidance for “high Density living”.⁸

“

...we have prepared guidance for high density living, a supplementary planning document (SPD) that talks about how we could successfully design tall buildings for people to live in

”

Michael Ritchie, Tower Hamlets
[Planning Committee meeting](#), February 2025

If such new tall building design standards provided for flats that were larger and more versatile, they would be better able to be adapted to meet the needs of people as they move throughout their life.



Recommendation 2: The GLA should produce guidance setting housing design standards specifically for tall residential buildings as part of the next London Plan. These should recognise the distinct requirements of tall residential buildings and the need for more living space required as standard.

⁸ London Borough of Tower Hamlets, [High Density Living](#), August 2022

Community Engagement

Generating engagement with planning consultations can be challenging due to the complex nature of planning, and the Committee heard from one guest that it is not uncommon for the views of residents to be considered last by developers. But due to the significant impact of tall buildings on local communities, engagement is vitally important.

“ It speaks to a fundamental challenge for planning therein that it is very difficult for the general public to engage with the planning process in the abstract. Let us talk about locations for tall buildings and [the] abstract heights that they might be. What [the general public] will respond to is when you show them a picture of a tall building and say that [this building] is going to be built at the end of your street, and then they will engage with the process. In many respects, it is a bit too late by that point, because the strategic planning has already happened, and the locations have been decided, and D9 has directed us towards a maximum height.”

“ Developers will tell you, “It is just not possible to listen to everybody because we are constrained by so many factors”. My worry would be that the community voice, the non-professional voice, would be the last one that was responded to...”

Michael Ritchie, Tower Hamlets
Planning Committee meeting, February 2025



Community Engagement

There are some examples of successful community engagement though interactive and visual plans, and community panels.

“ One of the things we have done at the plan-making stage -- panels and forums are very useful because people are already organised and they know each other and they are meeting regularly ”

Michael Ritchie, Tower Hamlets
Planning Committee meeting, February 2025

The Committee heard that physical representations of tall buildings, such as foam and 3D models, can be helpful when engaging with the public. Models help people appreciate the potential scale of developments and gain an understanding of how this will impact their neighbourhood.

“ which we found with residents, have been a real good positive outcome because they can locate their own homes in some instances, and they can also understand what that impact is and the scale of these buildings that we are proposing. ”

Jessica Potter, Southwark
Planning Committee meeting, February 2025

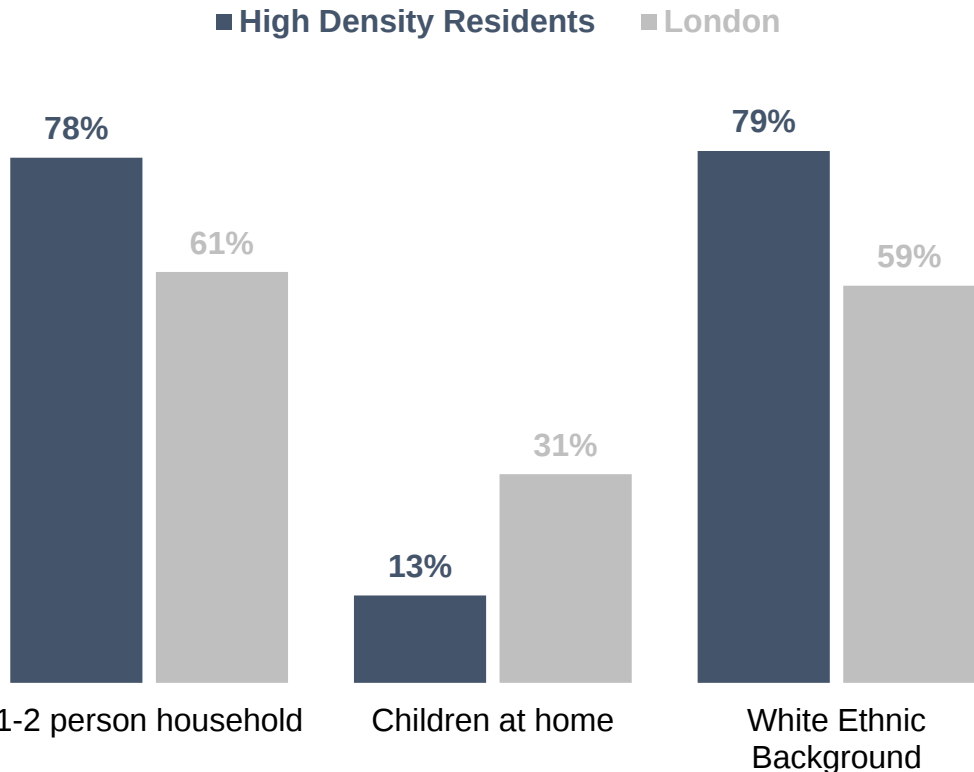
A visual representation of the Tall Building Strategy in the Old Kent Road Draft Area Action Plan (2024)



Source: Southwark Council, [Old Kent Road Area Action Plan Part 1 \(Policies\)](#), (2024)

Demographics and liveability

Survey respondents in high density dwellings compared to London averages (517 responses)



Source: Fanny Blanc, Kath Scanlon, Tim White, [Living in a denser London: How residents see their homes](#) (2020)

More work needs to be done to understand who lives in tall buildings, and how liveable they are for different demographics. This understanding should inform how residential tall buildings are considered in the future London Plan. Pat Turnbull, referring to newer high-rise developments, noted:

“ We need to know more about what the experience of living in these towers is like, and we need to talk about it and tell people because that is a very important element of whether they should have ever been built in the first place. ”

Pat Turnbull, London Tenants Federation
[Planning Committee meeting](#), January 2025

“ The only people who definitely know who is living in the tall buildings are the managers of the buildings, but they do not publish that information. ”

Dr Kath Scanlon, LSE
[Planning Committee meeting](#), January 2025

The GLA has published guidance on delivering Post Occupancy Evaluation in London, and ran a pilot Post Occupancy Evaluation scheme, however it did not publish the results.⁹

⁹ GLA, [Delivering Post Occupancy Evaluation](#), February 2024

The lifetime costs of living in a tall building

Rising maintenance costs and service charges are increasingly an issue for residents in tall buildings.

“ *there are often complaints of lack of information about how the charges are calculated, and of large adjustments after the end of the year* ”

London Forum of Amenity and Civic Societies
[Call for Evidence Response](#), March 2025

The Committee heard from some guests that it might be beneficial for more information about the lifetime costs of all housing typologies to be provided to prospective residents.

“ *In the same way that we look at energy performance and we talk about energy performance certificates, and we allow people to compare different properties against one another. Having an assessment of those lifetime or over a ten-year period, likely maintenance costs. Many of these things are thought about as part of the acquisition process; if you are buying a leasehold, your solicitor will make those inquiries and they will look at what the sinking fund for the building is, and so on. Having a proper assessment of what those costs could be is a really good idea from a consumer perspective.* ”

Chris Edgington, Arup
[Planning Committee meeting](#), January 2025



When the Deputy Mayor was asked if he would support such a proposal, he said that he would support the principle but not necessarily in planning terms:

“ *Absolutely. I am not sure whether it is so much a planning issue, but I am absolutely in favour of the principle.* ”

Jules Pipe CBE, GLA
[Planning Committee meeting](#), February 2025

What should we know about high-rise living?

3



Recommendation 3: Given tall buildings' significant impact on place and space in London, the GLA has an important role in helping to build the evidence base for where and how tall buildings are or are not appropriate, and their lifetime costs. This should involve developing guidance linked to London Plan Policy D9 on impacts:

- Including a requirement for all permissions with more than 6 storeys or 18 metres to have a post-occupancy evaluation (POE).
- Providing a template alongside best practice guidance for how this information should be gathered.
- Hosting an open access post-occupancy evaluation databank, which boroughs and other interested parties can use for research purposes.



CHAPTER FOUR

ENVIRONMENTAL COSTS OF TALL BUILDINGS

Carbon impacts of tall buildings



The Carbon impacts of residential tall buildings can broadly be split into three groups. Embodied carbon refers to the emissions generated during construction maintenance and refurbishment of buildings. Operational carbon refers to emissions generated through use.¹⁰ Transport carbon refers to the emissions generated through transportation. Having tall buildings closer to transport nodes reduces their overall carbon impact

The Committee heard that the data necessary to understand the carbon impacts of tall buildings is still growing. Over time it will be possible for developers to perform more complex assessments of carbon costs and remove avoidable excesses.

“ From a building services perspective, the supply chain information we need to realistically assess embodied carbon in our systems has only started to proliferate probably in the last three to four years. We have got a much greater amount of information that we can now use to assess and align our designs, really considering the whole-life carbon, the upfront, and then the operational carbon ”

Chris Edgington, Arup

Planning Committee meeting, January 2025

“ We have been talking about embodied carbon for 20 years, at least, the whole of my career. It is only really in the last handful of years it has become well-understood enough that you can make meaningful calculations around it. It is coming through local authorities, the GLA as well has got benchmarks and aspirational values for us to aim for ”

Russell Whitehead, Robert Bird Group

Planning Committee meeting, January 2025

¹⁰ ARUP, [Tall Buildings: Rising to the Net Zero Challenge](#) (2023)

Environmental sustainability assessments

Developers are required to provide much more information around a building's sustainability in planning applications than in the past.

“ *The amount of upfront design effort compared to ten years ago is quite striking. The cost of assembling a serious planning application has really significantly increased, and the amount of effort, the amount of expertise, particularly around sustainability metrics, around embodied carbon and whole-life carbon, we are doing a lot more work upfront.* ”

Russell Whitehead, Robert Bird Group
[Planning Committee meeting](#), January 2025

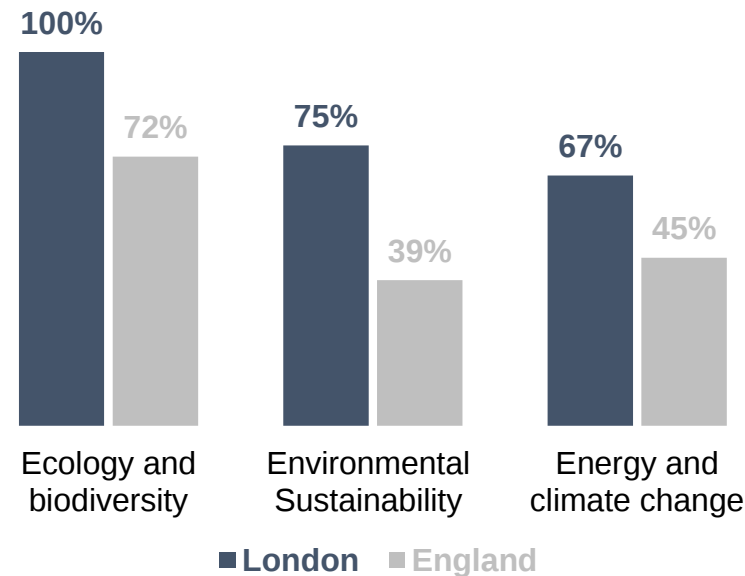
“ *Russell [Whitehead] mentioned earlier on about the amount of scrutiny that planning applications are subject to now and the large volume of information, which is prepared and assessed on behalf of developers, which I think is excellent.* ”

Chris Edgington, Arup
[Planning Committee meeting](#), January 2025



Environmental sustainability assessments

Proportion of respondents that reported having environmental skills gaps in their Planning Teams (2023)



Source: MHCLG, [Local Authority Planning Capacity and Skills Survey 2023](#), (2025)

However, some Boroughs reported that they currently lack the skills and resources to make assessments of the environmental impacts of tall buildings, and that they often take reports at face value.

“

One of the issues local authorities have is that we lack the expertise to properly interrogate that [sustainability] and understand that so that is something that we would need support, or we would need further resourcing in order to properly get up to speed with.

”

Michael Ritchie, Tower Hamlets

Planning Committee meeting, February 2025

“

If you read a sustainability report from a developer, they are pretty hefty documents and very, very technical. As Michael [Ritchie] said, by and large we are dependent on those being honest representations of the actual performance of a building. A huge amount of effort has gone in and continues to go into making buildings more sustainable, but the technical expertise needed to review those things is considerable and the resource implications for local authorities are quite considerable as well

”

Colin Wilson, Southwark

Planning Committee meeting, February 2025



Recommendation 4: The GLA should work with London Councils to convene an ‘Environment and sustainability in planning’ community of practice to enable Boroughs to share knowledge and expertise on reviewing these assessments, and provide external expertise and resources for boroughs to draw upon.

The GLA is building an environmental impact evidence base

At the Committee's meeting on the 11 February, Jules Pipe acknowledged that there is a need to further develop our understanding of the whole life carbon impact of tall buildings. The evidence being collected by the GLA will go a long way in demonstrating whether tall buildings are compatible with the Mayor's net zero targets.

“ *it is a requirement to submit the whole life carbon costs of buildings as part of their planning applications, although we have not yet set benchmarks or limits. Although it was thought about in the last Plan, there was not the evidence base to do that, so that is why the new element in the Plan was to start building that evidence base by requiring the figures for whole life carbon.* ”

Jules Pipe CBE, GLA
Planning Committee meeting, February 2025



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Recommendation 5: The GLA should share any findings that emerge from the whole-life carbon evidence base with the Planning and Regeneration Committee with a view to including these benchmarks within the next London Plan as appropriate.

OTHER FORMATS AND LANGUAGES

If you, or someone you know needs this report in large print or braille, or a copy of the summary and main findings in another language, then please call us on: **020 7983 4100** or email assembly.translations@london.gov.uk

Chinese

如您需要这份文件的简介的翻译本，
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Email 与我们联系。

Vietnamese

Nếu ông (bà) muốn nội dung văn bản này được dịch sang tiếng Việt, xin vui lòng liên hệ với chúng tôi bằng điện thoại, thư hoặc thư điện tử theo địa chỉ ở trên.

Greek

Εάν επιθυμείτε περίληψη αυτού του κειμένου στην γλώσσα σας, παρακαλώ καλέστε τον αριθμό ή επικοινωνήστε μαζί μας στην ανωτέρω ταχυδρομική ή την ηλεκτρονική διεύθυνση.

Turkish

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Punjabi

ਜੇ ਤੁਸੀਂ ਇਸ ਦਸਤਾਵੇਜ਼ ਦਾ ਸੰਖੇਪ ਅਪਣੀ ਭਾਸ਼ਾ ਵਿਚ ਲੈਣਾ ਚਾਹੋ, ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਇਸ ਨੰਬਰ 'ਤੇ ਫ਼ੋਨ ਕਰੋ ਜਾਂ ਉਪਰ ਦਿੱਤੇ ਡਾਕ ਜਾਂ ਈਮੇਲ ਪਤੇ 'ਤੇ ਸਾਨੂੰ ਸੰਪਰਕ ਕਰੋ।

Hindi

यदि आपको इस दस्तावेज़ का सारांश अपनी भाषा में चाहिए तो उपर दिये हुए नंबर पर फोन करें या उपर दिये गये डाक पते या ई मेल पते पर हम से संपर्क करें।

Bengali

আপনি যদি এই দলিলের একটা সারাংশ নিজের ভাষায় পেতে চান, তাহলে দয়া করে ফো করবেন অথবা উল্লেখিত ডাক ঠিকানায় বা ই-মেইল ঠিকানায় আমাদের সাথে যোগাযোগ করবেন।

Urdu

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Arabic

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فراجع الاتصال برقم الهاتف أو الاتصال على
ال عنوان البريدي الإلكتروني أو عنوان البريد الإلكتروني أعلاه.

Gujarati

જો તમારે આ દસ્તાવેજનો સાર તમારી ભાષામાં જાણીતો હોય તો ઉપર આપેલ નંબર પર ફોન કરો અથવા ઉપર આપેલ ટપાલ અથવા ઇ-મેઇલ સરનામા પર અમારો સંપર્ક કરો.

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