LONDONASSEMBLY

May 2025

Planning and Regeneration Committee

This document contains the written evidence received by the Committee in response to its Call for Evidence, which formed part of its investigation into tall residential buildings in London

Calls for Evidence are open to anyone to respond to. In January 2025 the Committee published a number of questions related to its investigation, which can be found on page 2. The Call for Evidence was open between the 21 January 2025 and the 4 March 2025.

Contents

LONDONASSEMBLY

May 2025

Questions asked by the Committee

1. Who lives in tall buildings in London and what are their experience of doing so? In particular:
    a. How do those experiences differ amongst different groups, including students, families, older people, and disabled people?
    b. What are the key benefits and challenges experienced by residents living in tall buildings?
    c. Do tall buildings impact residents' mental and physical well-being compared to other types of housing types?
2. How do tall buildings contribute to or detract from the creation of inclusive and thriving communities in London? In particular:
    a. How do local communities perceive tall buildings in their areas?
    b. Are there examples of good tall buildings in London? What features make them successful?
    c. Are tall buildings helping to meet London's housing need?
    d. Are there any particular tenures where tall buildings have been most or least successful?
    e. What are the environmental and energy impacts of tall buildings compared to other typologies?
3. What improvements or changes should be made to the way tall buildings are planned and approved in London? In particular:
    a. How are the wider impacts of tall buildings considered by Boroughs when granting planning permission?
    b. How are the wider impacts of tall buildings considered by the Mayor of London when granting planning permission?
    c. How should the new London Plan (and local development plans) accommodate tall buildings as part of a mix of housing typologies?

LONDONASSEMBLY

May 2025

Alistair Levie Ref No. 001

Dear Sir / Madam,

I happen to live on the 12th floor (of 15) at Tonic LBGTQ retirement apartment block.

I have only been here since November, but I can say it's the best place I have ever lived, due to the community atmosphere living among like minded friends who are my neighbours. Our social groups and chats on whatsapp and sense of community make it. But also the well designed building we live in. We are not over looked by neighbours. We are central and close to transport links and tesco express next door - a bus stop is directly outside. There is parking for bicycles and Santander bikes are across the road to hire.

The Committee welcomes any evidence relevant to the following principal questions:

Who lives in tall buildings in London and what are their experience of doing so? In particular:

How do those experiences differ amongst different groups, including students, families, older people, and disabled people?

Our community and shared spaces (lounge and dining and laundry and hall areas).

What are the key benefits and challenges experienced by residents living in tall buildings?

Benefits: we can see and access each other at the touch of a (lift) button.

Do tall buildings impact residents' mental and physical well-being compared to other types of housing types?

I have never felt safer. Safer than when I lived in a terrace, in a standalone detached home and in an first floor of a two-storey apartment in Colindale.

How do tall buildings contribute to or detract from the creation of inclusive and thriving communities in London? In particular: How do local communities perceive tall buildings in their areas?

It's so quiet being high up.

Are there examples of good tall buildings in London? What features make them successful?

LONDONASSEMBLY

May 2025

Our Bankhouse apartment is so warm and quiet and sound proof, and the lifts work.

What are the environmental and energy impacts of tall buildings compared to other typologies?

Surely a communal shared heating system is not only cheaper but also environmentally friendly and less wasteful than having hundreds of individual boilers. Throughout my life the servicing of a boiler has always been expensive and time consuming. We should be moving off gas and oil at any rate and becoming fossil fuel free.

What improvements or changes should be made to the way tall buildings are planned and approved in London? In particular:

How are the wider impacts of tall buildings considered by Boroughs when granting planning permission?

They should have wind turbines on top generating communal electricity. They should have solar panels up the south side.

How are the wider impacts of tall buildings considered by the Mayor of London when granting planning permission?

They should have a carbon neutral or A rated EPC

How should the new London Plan (and local development plans) accommodate tall buildings as part of a mix of housing typologies?

Definitely part of it.

LONDONASSEMBLY

May 2025

Friary Park Preservation Group Ref No. 002

2025 London Tall building submission

The London Assembly Planning and Regeneration Committee investigation into tall buildings in London is long overdue. The GLA wants to hear from those involved in the planning and development of housing in London and those involved with supplying affordable homes. As a sociologist I have collected information on London's redevelopments and the changing demographics of Ealing since 2014.

The special interests' groups like G11 (formerly trading as G15) and the National Housing Federation members who receive millions of pounds of government funding on top of billions each year in Housing Benefit should be able to provide the required data at the touch of a button. Unfortunately, London's Community Assets Managers struggle to answer straightforward questions because they collate their information in order to receive Government funds and maintain their Tax-exempt status. The directors of Registered Social Landlords give themselves huge salaries and bonuses but leave tenants dead bodies to rot while collecting rent from the deceased's bank account.

My personal experience of living in a high rise was in Merryton Tower, an 18-storey tower block on the Muirhouse estate Motherwell, Scotland. It was built in 1965 and is 52m tall with none of the design faults Labour Party shortcuts and backhanders usually delivered. The flat is listed, much to my surprise, on
https://www.chimnie.co.uk/uk/mid-scotland-and-fife/motherwell/flat-80-merryton-tower-089a01bdf5e2534917d7ab1f09c4da8c

I was offered this Motherwell & Wishaw Council property in 1985 on surrendering my claim to my father's home, a 3-bedroom Council house with back and front gardens. I resigned from the civil service in London and took the Senior Researcher position with the Summerlee Heritage Trust, Coatbridge. I gave up the job and that tenancy after I bought a flat in Acton House, Horn Lane, Ealing in 1987.

When my company Fulcrum folded and I was unable to repay my mortgage Ealing Council put me up in a hotel in Lancaster Gate until the Local Government Ombudsman had them rehoused me in the Friary Park estate in July 1989. This was a Secure Tenancy with the London Borough of Ealing for a flat built by Laings. The whole estate was far below housing standards so Ealing Council was happy to hand it to Rod Cahill then operating as Ealing Family Housing Association in 1990.
The lack of insulation meant I could not get a mortgage. I could and did rent it out until the Beds in Sheds scandal 2013.

Peabody Trust, when operating as Catalyst Housing Group, began to try for planning permission to demolish 236 social housing units to build 990 flats in 3 tower blocks on the Friary Park site in 2014. I set up the Friary Park Preservation Group which delayed the

demolition of a vibrant, coherent community for 5 years. My account of the health problems Ian McDermott's 2021 demolition process caused and the decanting of the Friary Park residents has a Facebook page to which everyone is welcome to post.

1a. In my experiences tower blocks in London are being used as dumps for too many disruptive individuals and these tenants are being left with no support. That could never happen in any Scottish high-rise because milk and the newspapers were delivered each day and all had live-in caretakers. When the SNP stopped that system the tower blocks very quickly fell into ruin. The worst, 16 storey Glencairn Tower, was demolished in a controlled explosion on November 20, 2011.

1b. The key benefits are all electric heating, washing and cooking facilities.
The challenges experienced currently by residents relate to lack of maintenance and the high service charges for services that are not delivered. All Registered Social Landlords employ designated engagement staff who are failing tenants while some, like Peabody Trust, use the market research firms like Savanta run by Graeme Cade to create reports on the attitudes and experiences of tenants in the most dishonest way possible primarily to placate the huge egos like Ian McDermott.

1c. Isolation and anti-social neighbours are highly detrimental to the mental and physical well-being of residents of tall buildings. For instance, compared to other types of housing types the noise problems are much worse coming from the upstairs neighbours.

2. Tall buildings undermine the creation of inclusive and thriving communities in London. In addition to the anti-social effects of smartphone tenants are physically isolated in confined spaces.

2a. Across Ealing local communities perceive tall buildings in their areas very negatively. For example, on the Verdean estate in North Action, local residents are opposed to the short-term tenancies Peabody Trust is granting, earning them £286.67 in Housing Benefit each a week for their unsold flats.

2b. With so many some must work but I have not heard any.

2c. No. Those being built are not selling so developers like Peabody Trust welcome the Housing Benefit they get. Registered Social Landlords always claim to be in poor financial positions but the Peabody Trust's lowest rent raise last year was £20 a week, Their Equity Loan repayments, fees and excessive service charges have made millionaires of Rod Cahill, Ian McDermott and many others.

At the same time any family failing to pay Service Charges face eviction within 3 months which is exasperating homelessness. All banks and London RSL selling Equity Loans set the amount of repayment in accordance with payments published on the Government's Local Housing Allowance website. The Equity Loan repayments are covered by Housing Benefit

despite the fact that the RSL to whom Housing Benefit is paid directly owns over 80% of the property.

2d. Rent to buy tenures are proven to be most successful with tall buildings but are opposed by the National Housing Federation. The directors of Housing Associations hate to admit their properties were paid for by taxpayers and the rents they receive are pure profit they call surplus to evade tax.

2e. The reports on environmental and energy impacts of tall buildings need careful scrutiny. Greenwashing needs to be eradicated by the GLA as Local authorities lack the competent qualified staff due to the poor information provided by the Local Government Association, the directors of local authorities' trade union.

3. Improvements to the way tall buildings are planned and approved in London require many changes. There have been improvements since the heyday of T Dan Smith scandal but MPs, local authority councillors and directors of housing associations face very little scrutiny of their dealings with developers. Independent monitoring is the essential improvement required.

3b. Mayor of London seems to grant planning permission then starts fundings the companies.

3c. The latest Sadiq Khan London Plan (6th attempt, is it?) must accommodate tall buildings as part of a mix of housing typologies. Ealing already has a 51-page Tall Buildings Strategy that explains the principles for how tall buildings are defined and where they may potentially be located.

I know about the Labour government target of 1.5M homes and London being set a target of 88,000 more homes built a year. Britain's 1960's high-rise public housing era was a serious social policy mistake. Today Ealing's high-rises are mostly accommodation for students from counties like China and Saudi Arabia, countries that will not have enough young people to send abroad in 10 years.

The next London Plan must require all Registered Social Landlords getting GLA funding to report who is being housed, in what type of building and how much rent they collect in direct rent payments, Housing Benefit and Equity Loan repayments every 3 months.

It is disconcerting that after 2 full terms the Mayor Sadiq Khan and his extensive staff had failed to produce a tall building policy or even a London Plan. What is clear since 2016 is that those who have been responsible for providing housing have failed to do so. Years of poor housing planning and delivery has been detrimental to the health of Londoners.

I think you will find I made similar comments to the 2024 GLA conversation on How Safe are high rises.

LONDONASSEMBLY

May 2025

London Forum of Amenity and Civic Societies Ref No. 003

London Forum of Amenity and Civic Societies
Response to GLA Planning and Regeneration Committee Investigation
Planning and Tall Buildings

~~Introduction~~

The London Forum welcomes this investigation into homes in tall buildings, and its focus on evidence relating to the experiences of different groups of residents in such buildings, the impact on wider communities, and how tall buildings policy should be handled in the forthcoming London Plan. Our response foregrounds planning, and the issues we believe must be addressed in the London Plan. But like the Committee, we believe that policy should be based on evidence.

Our brief response on planning is therefore accompanied by two Annexes. Annex 1 provides an analysis of how planning policy for housing delivery has developed over the past thirty years, with its emphasis on tall buildings. Annex 2 provides an outline response to the first two detailed questions set in the Call for Evidence, on the experiences of the different groups of residents, and the impact on wider communities across London.We draw on evidence from our member societies, but also on a number of recent reports, in particular the Centre for Cities recent report *What is the Future of High-Rise Housing **here***, the report on the future of high-rise housing by the LSE which has some useful recommendations from page 142 onwards ***here*** and a report on the perceptions of safety of residents in tall buildings which was ***published*** by the Government which relates to the committee's question 2 a. We commend these reports to the Committee, and especially their findings and recommendations.

Tall Buildings and housing delivery in London

Our conclsion from the historical and other evidence we present in Annexes 1 and 2 is that the following issues need urgent attention in the next London Plan:

- reviewing the impact of tall buildings over the last decade:
    - on our communities – are they comfortable with the change – 270 tall buildings over 20 storeys completed in the last 10 years – predominantly housing, but very few affordable homes; and
    - on our townscape, skyline and, in particular on the Thames.
- reconfirming that the plan-led approach through London Borough local plans, rather than GLA officers actively encouraging major departures from local plans.
- reviewing the housing targets in Opportunity Areas, many set before 2011 London Plan - most are untested and are now generating very high densities and tall buildings.

- reviewing the tall buildings pipeline – at least 20 years' worth – which is like a drag anchor on housing delivery.
- improving build-out rates.
- considering how life-time costs of tall buildings can be factored into planning policy and decision-making.
- reviewing the balance between tall buildings built for different tenures and for different groups of people, including the mix of sizes of homes (single-bed up to large family-sized units); student accommodation; large-scale co-living developments; build-to-rent; and affordable housing, especially social rent.
- determining where we want to be in 20 years' time – what kind of London do Londoners want?

Annex 1
Development of policy and process for delivering tall buildings

London Forum of Amenity and Civic Societies has compiled this timeline and has drawn conclusions at the end of it.

2000-2008: Mayoral advocacy of tall buildings

The first Mayor of London, Ken Livingstone, was an advocate for tall buildings, although at the time he and his deputy, Nicky Gavron, both considered that there was a limited market, perhaps less that 20 buildings and that these would be primarily for commercial uses, such as offices.

2002: Mayor's Interim Guidance on Tall Buildings:

In advance of producing the first London Plan, the Mayor issued a set of interim guidelines regarding the development of tall buildings in London, outlining where such buildings would be considered appropriate, what design considerations should be taken into account, and how they should integrate with the existing cityscape. This was essentially a temporary policy until a more comprehensive policy could be established. It set the tone for the Mayor's support for tall buildings.

2004: The first London Plan produced a policy (4B.8) through which tall buildings were generally encouraged to be developed in specific areas like the Central Activities Zone (CAZ) and Opportunity Areas, where they could act as landmarks, enhance regeneration, and contribute to a coherent economic cluster, but only if they were designed to be architecturally high quality and did not negatively impact surrounding areas with regards to overshadowing, views, or character; essentially prioritizing good design and appropriate locations for tall buildings.

The basic elements of Policy 4B.8 of the 2004 London Plan were that the Mayor would promote tall buildings and would work with boroughs to identify suitable locations for them. From 2000 to 2008, the Mayor encouraged developers by actively supporting their proposals both on application and on appeal, with GLA officers even appearing as advocates at public inquiries (e.g. Lots Road Power Station).

May 2025

In 2008 the Mayoral Call-in criteria were changed by Article 7 of the Town and Country Planning (Mayor of London) Order, which enabled the Mayor to call in cases where a London borough proposed to refuse an application involving tall buildings. This enabled the Mayor to override a borough's decision to refuse an application for tall buildings.

2008 -2021

In 2008 Boris Johnson became Mayor of London, and although initially concerned about the increasing number of applications for tall buildings, he in fact, through his development management function, continued to support the development of tall buildings, through negotiating for changes to the development, and, if the borough proposed refusal, used his call-in powers to requisition the case for his decision.

Since 2008 both Boris Johnson and Sadiq Khan have called in applications for tall buildings that boroughs have proposed be refused, and have subsequently granted consent for almost all of these applications, in many cases after having negotiated a further an increase in their size and/or height, often for the delivery of more affordable housing.
That was achieved by the use of grant funding from the Government to help developers to achieve viable developments with increased low-cost rent homes in their schemes.
The issue of Mayoral call-in was explored in a 2021 Assembly scrutiny at which London Forum of Amenity and Civic Societies gave evidence, which confirmed that call-in was used specifically to allow the proposed developments.
The Assembly Planning and Regeneration Committee responded in January 2021 with the response ***here*** to the Mayor's 'Good Quality Homes for All Londoners London Plan Guidance'. In it they made many recommendations for consideration of tall buildings, alternatives to them, operational requirements, environmental impact, costs and housing types. London Forum supports those proposals and expects the current scrutiny of the Committee will identify the issues to be addressed by revised policy.

London Plan 2021: Policy D9: Tall Buildings

In the 2017 draft of the current London Plan there was a Policy D8: Tall Buildings, in which the Mayor devolved the planning of tall buildings to London boroughs, requiring them, through their local plans, to define what is a tall building in their local context and to identify on maps in their Development Plans the locations where tall buildings will be an appropriate form of development in principle.
Following the Examination of that London Plan, the policy (now Policy D9 in the published version) was amended by a direction by the Secretary of State in December 2020:
3) Tall buildings should only be developed in locations that are identified as suitable in Development Plans
This amendment was designed " to ensure that there is clear policy against tall buildings outside any areas that boroughs determine are appropriate for tall buildings"

New London Architecture: Tall Buildings Surveys 2014-2024

In 2014 New London Architecture (NLA) held an exhibition at the Building Centre and published the result of a survey of tall buildings in the "planning pipeline" – between pre-application, through application, permission to build and under construction. The definition of a

tall building used by the NLA survey is a minimum of 20 storeys, whereas the GLA's database uses a figure of 10 storeys. [We are currently awaiting more data from the London Planning Datahub]

The biggest revelation of the early surveys was the scale of the "pipeline". The 2014 exhibition showed that there were 263 tall buildings in the "pipeline" and it came as a major shock, especially when visualisations were presented for the changing skyline. This was the first time the scale of change and, particularly the scale of future commitments, was evident.

The 2015 Survey, after improving the database, showed that there were in fact 436 tall buildings in the pipeline. By 2024, despite 270 tall buildings had been completed since 2014, there were around 600 tall buildings in the pipeline, or over 20 years' worth of completions. Over this ten-year period there has been a significant change in the locations for these tall buildings, initially focused in the Central Activity Zone, especially the City of London and Isle of Dogs, and in Opportunity Areas, but increasingly now across many inner and outer London boroughs.

The other major change, however, has been the use of buildings. Although by 2014 the proportion of developments in the pipeline that were primarily residential had already exceeded 80%, now its share is closer to 90%.

The annual surveys include details of schemes that are likely to go ahead. A major feature is that few of the schemes produce even 10% affordable housing. There has been a significant number of towers for student housing, but most of the other additional housing has been in the upper end of the market, including buy to rent. As a result, although the potential locked up in the pipeline of these unimplemented developments has been estimated at 110,000 homes, the 2024 survey reports that the 270 schemes completed since 2014 had delivered an estimated 58,000 new homes.

Conclusions and possible actions:

- Over the last decade NLA's annual survey showed that that 270 tall buildings had been completed which produced an estimated 58,000 new homes, or 16.5% all housing completions in London. Since affordable housing accounted for significantly less than 10% of these homes, the number of affordable units was probably considerably less than 5,000 units over the decade 2013-2023 or less than 500 per year. More data is needed on the occupiers of tall buildings, distinguishing both household size and income.
- The rate that the pipeline is being built out is very slow – it is quite possible that many of the schemes may no longer be viable due to increased build costs, especially if the current valuations of the sites are unrealistic. An accumulation of unimplemented or unimplementable consents may be a drag on the market. There needs to be either an incentive or penalty to encourage build out of these consents. The GLA should work with the Government to explore measures to tackle "unproductive land speculation" and slow build-out rates by developers of permitted residential sites, rather than blaming the planning system and 'red tape' for the housing crisis, according to the Institute for Public Policy Research (IPPR) *here*.
- Tall buildings may meet the need for certain types of market housing, including student housing, although their contribution to affordable and family housing seems to be

limited. the GLA should assess how adverse has been the use of available land for student and market housing in reducing the best land use to deliver social and other affordable housing.

- There is, however, a difference between consents and delivery, especially if the affordable contribution is no longer considered to be viable. The GLA should monitor the outcome of tall buildings applications, especially the amounts and types of housing delivered. This monitorin should be publicly accessible on the GLA Datahub people to consider. Furthermore, the Committee should seek information the Mayor's viability unit on trends in developers' viability.
- Greater emphasis is needed on the character of places that we are creating to get a better fit between the type of housing being delivered and the type of places that people need and want to live in. Planning decisions should take more account of the impact constraints in London Plan Policy D9 section C which will need review and emphasis.
- Too few Councils have yet identified locations where tall buildings would be acceptable as required by London Plan Policy D9 section B, which could have given assurance to communities and developers of what would be permitted and where. The Committee should consider how it might help borough planners with the skills and resources required for spatial planning and design coding for tall buildings.

Annex 2

1. Residents' Experiences of Tall Buildings

Many different kinds of people live in tall buildings across London. Such buildings are entirely satisfactory for people who choose to live in them, and who have an income high enough to meet the often-high costs as leaseholders or tenants. They may be particularly suitable for students and young people without children. But for families with children, and for people who have little or no choice as to where and in what kinds of housing they live, tall buildings can come with a host of problems. This is in large part because tall buildings are typically more complex and costly to build and maintain than medium and low-rise buildings.
The kinds of problems that arise for many residents of tall buildings include the following;

A. Design and Build Quality

Residents often complain of a number of features that arise from poor quality design and building standards. These include

- Concerns about the adequacy of fire safety, emergency exit facilities and procedures
- Noise transmission through walls, floors, ceilings and ventilation systems.
- Lack, or poor quality of storage facilities, particularly for families with young children
- Heating and ventilation problems, including over-complex and user-unfriendly systems, and excessive heat in the summer
- Poor quality finishes on floors and walls that make them difficult to clean
- Problems with waste and refuse systems

- Poor lighting, with insufficient access to daylight and sunlight even at high levels, with windows that are too small.
- Structural problems leading to leaks and/or the growth of mould
- Accessibility problems for disabled people, including inadequate turning circles.
- Poor quality and inadequate communal facilities.
- Poor provision of green open space for residents at higher and intermediate levels and in the surrounding area.
- Poor internal arrangements for delivery and parcel reception and distribution.

It should be added that many of these problems arise from inadequate quality-control during building, but also problems with building regulations and related standards and guidelines.

B. Building Management and Maintenance

Residents typically have little say in the selection of managing agents, and they complain repeatedly of poor building management and maintenance, including

- Repeated and often lengthy lift breakdowns, along with malfunctioning access doors
- Leaks "through multiple floors, multiple times"
- Unresponsive building managers and managing agents
- Ineffective and inefficient management arrangements for all tenures to involve residents and react to their concerns in a timely manner, including on repairs and major refurbishments.
- Poor management and cleaning of communal areas internally, and of external grounds

C. Transparency on Costs and Service Charges

Residents face both a regular and an irregular but usually large problem over costs. Annual service charges rise every year. But it is often unclear to residents exactly what they are paying for. Regular maintenance and cleaning are usually provided, along with insurance. But services may include energy supplies, concierge services, or the use of roof gardens, gyms or swimming pools to which some residents are uncertain as to whether they do in fact have access. Similarly, there are often complaints of lack of information about how the charges are calculated, and of large adjustments after the end of the year. Some residents complain of managing agents who they believe regard the service charge as their "piggy bank".

Unexpected large-scale bills for major or unforeseen structural, heating or electrical repairs and refurbishment are a constant worry for many residents. Only a minority of residents in tall buildings pay regularly into sinking funds to mitigate (or even meet) such costs. When large bills arise, residents often complain of their size and lack of transparency as to how they have been calculated.

Underpinning residents' concerns about both service charges and the large irregular bills are limitations in their understanding of the rights and obligations of leaseholders. It is not in the interests of developers or freeholders to provide accurate information about long-term costs; nor do they typically seek to ensure that buildings are specified and constructed in ways to minimise those costs.

2. Impact of Tall Buildings on the Wider Community

A. Size of Units

One of the key impacts of tall residential buildings on the wider community results from the over-emphasis by both planners and developers on homes suitable for one, two, or at the most three people. For developers, they are cheap; for planners, they help to maximise numbers and meet housing targets. For families, and people wishing to have children, the lack of available accommodation to meet their needs is disastrous. The result is unsustainable levels of emigration, from inner London in particular; and efforts to meet the GLA's and individual boroughs' goals to develop balanced and sustainable communities are thus disastrously undermined, if not set at nought. There must be a thorough review of poliicies and strategies relating to housing mix across London.

B. Physical Impacts

The design problems we have outlined above have adverse effects not only on residents of tall buildings, but on the community at large. These include:

- Inadequate space around tall buildings and set back from the pavement to avoid them being overwhelming and with activity and walk-throughs at the ground level.
- Complex routes through clusters of tall buildings, making them difficult to to navigate and reduing their permeability
- Inadequate off-road parking for delivery and service vehicles.
- Reductions in daylight and sunlight, accompanied by adverse wind effects around and within clusters of high buildings.
- Cliff-edge domination of towers looming over low rise houses with small gardens, particularly when the tall buildings are to the south of them.
- Visual dominance over the River Thames, redutions in visual access to the river, worsened by tall buildings that present their least attractive face to those living behind them.

It is essential that attempts are made in policy to mitigate these kinds of problems.

LONDONASSEMBLY

May 2025

London Tenants Federation Ref No. 004

The London Assembly Planning and Regeneration Committee has launched an investigation into tall buildings in London. As part of the investigation, the Committee will examine:

1. current demographics of residents of tall buildings (who is being housed by this building type).
2. the attitudes and experiences of residents in tall buildings (what is it like to live in).
3. how tall building policy should be considered in the future London Plan (who are they designed for, what keeps them healthy and safe, do they fit their surroundings well).

Who can submit evidence?
This Call for Evidence is open to all who would like to respond.
The GLA particularly welcome responses from those involved in the planning and development of housing in London, including those involved with supplying affordable homes.

What about those who live in and around high rise blocks?
We also need to share our evidence; our experience of living in and around high rises. As the Mayor is planning to build more 'tall buildings' to reach the Labour government target of 1.5M homes. London has been set a target of 88,000 more homes built a year. Their plan is to build more high rise:

When discussing the potential role of tall buildings in providing new homes, The London Plan (2021) states: "[they can] form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, contributing

new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Mayor of London, The London Plan (2021)

The GLA would like you to reply to these questions/areas:

The Committee welcomes any evidence relevant to the following questions:

1. Who lives in tall buildings in London and what are their experience of doing so?

In particular:

1a. How do those experiences differ amongst different groups, including students, families, older people, and disabled people?

Younger people and students seem to like them more.

1b. What are the key benefits and challenges experienced by residents living in tall buildings?

Isolation from neighbours both within and outside the block. Dependence on lifts 24/7. Fear around the entrances. Maintenance and uncontrolled service charges.

1c. Do tall buildings impact residents' mental and physical well-being compared to other types of housing types?

Isolation and lack of natural light (where buildings are close together) can't be good for mental health.

LONDONASSEMBLY

May 2025

2. How do tall buildings contribute to or detract from the creation of inclusive and thriving communities in London?

In particular:

2a. How do local communities perceive tall buildings in their areas?

There seems to be a lot of opposition where I live. Developers do not do proper assessments of light loss - they estimate and don't actually visit to do measurements. There is no control over visual appearance so you can end up with clashing cladding and ugliness (eg Tottenham Hale). Puzzlement as to why we were celebrating the demolition of tower blocks not so long ago and are now building them again. Viewed as a profit thing for developers, not for local people who are priced out. Storeys often added after planning permission granted to 'maintain viability'.

2b. Are there examples of good tall buildings in London? What features make them successful?

2c. Are tall buildings helping to meet London's housing need?

No. New flats are too expensive. Social housing element often reduced after permission granted to 'maintain viability'. Often not suitable for families in need - most flats are 1 or 2 bedrooms. Social housing flats always the worst - locally bad examples of ground floor flats on busy main roads with absolutely no privacy or facing walls. Seem to be a repository for speculative investment.
A 'secret shopper ' test in Leyton revealed that although the developer said they wouldn't sell to foreign investors, they were quite prepared to.

2d. Are there any particular tenures where tall buildings have been most or least successful?

They seem to work better for short term housing - like student apartments, hotels and for the well -off where there is a single block with good views.

2e. What are the environmental and energy impacts of tall buildings compared to other typologies?

Dark streets and terrible wind tunnels. Wind effects seem to be underestimated - at Tottenham Hale for example or Woodberry Down. Lower level flats have to have the lights on all day where there are canyons of tall buildings. Construction may have major impact too - eg road closure and bus diversions in Walthamstow quite apart from the huge amount of cement used and and all the vehicles trying to get to the site. Piling is very noisy for both us and any animals around and may not be restricted to agreed hours. Loss of open space too - eg Metropolitan Open Land in Leyton, a school playground in Whitechapel. This is irreversible. And obviously the effect on the skyline and views.

3. What improvements or changes should be made to the way tall buildings are planned and approved in London?

In particular:

3a. How are the wider impacts of tall buildings considered by Boroughs when granting planning permission?

It's difficult to see. The impression is please just build, the consequences are secondary.

3b. How are the wider impacts of tall buildings considered by the Mayor of London when granting planning permission?

Not clear.

3c. How should the new London Plan (and local development plans) accommodate tall buildings as part of a mix of housing typologies?

Don't build on open spaces. Ensure and enforce a higher proportion of social housing. Stop using misleading 'affordable housing' labels where the costs are far beyond the reach of most people who need housing. Insist on local gain not miles away - eg doctors surgeries, new planting and open space. Ensure community facilities are there to facilitate mixing between high rise residents and the people who live around the block. Retake land that has been blocked or left empty by developers for years. Be much stricter about having a mix of flat sizes and not allowing post planning permission alterations.

Please select those questions most relevant to you or your organisation – **you do not need to answer all questions.**
Please feel free to share any other information on this topic you feel would be useful to the Committee.

Please send responses by email to: scrutiny@london.gov.uk

The deadline for submission is 4 March 2025.

LONDONASSEMBLY

May 2025

LSE Ref No. 005

Dear Andrew,

LSE Evidence Submission on Planning and Tall Buildings

We are writing to submit evidence to the London Assembly Planning and Regeneration Committee's investigation into London's tall buildings and how they impact residents. This submission expands on the evidence provided by Kath Scanlon in her appearance at the panel session on 28 January 2025.

LSE London, the Housing and Communities team in the Centre for the Analysis of Social Exclusion (CASE) and other colleagues from the School have extensively studied this issue and we want to flag examples of work we believe are relevant to this investigation.

They are presented below along with a short summary of which question from the investigation they are relevant to and the evidence they provide:

Leasehold, Commonhold and high-rise living (Ellie Benton, Ruby Russell, Kath Scanlon September 2024) (see also here)
Blog series relevant to question 1b, 2d.

This two-part blog from the Tall Residential Buildings Research Group[1], of which LSE academic Kath Scanlon is a member, summarises the discussion at a recent roundtable on the leasehold and commonhold systems of ownership and tall buildings in London. It explains how the leasehold system is used in tall buildings and evaluates how a commonhold system could—and could not—improve the experiences of residents, including in relation to costs like service charges. One conclusion that may be of particular interest was that commonhold could, in some cases, increase costs and complexity for residents. We can also provide a more extensive briefing on this subject if that would be of interest.

Protecting open space in an intensifying city: Views from built environment professionals (Ellie Benton, Ruby Russell, Kath Scanlon, July 2024)
Blog relevant to questions 1b, 1c.

This blog, also from the Tall Residential Buildings Research Group, summarises a separate roundtable with architects, developers, local authority officers and academics on open space and tall buildings. Most participants felt that the quality of open space was as important as the amount available: the discussion centred around what 'quality' means, the challenges in providing open space and how a building's height and density affect residents' access to open space.

[1] https://blogs.lse.ac.uk/lselondon/tall-residential-buildings-project/ Other members include June Barnes, previously CE of East Thames Housing Group; Dickon Robinson, previously Development Director of the Peabody Trust; Andrew Beharrell, Pollard Thomas Edwards; Roger Holdsworth, Pollard Thomas Edwards; and Paul Eaton, Allies and Morrison.

LONDONASSEMBLY

May 2025

Living in a denser London: How residents see their homes (Fanny Blanc, Kath Scanlon, Tim White, March 2020)
Published report relevant to questions 1a, 1b, 2b, 2c and 2d.

This report by LSE London and LSE Cities looked at fourteen high-density housing schemes in London. These are from a variety of geographic locations, are of different sizes and building typologies and many of them are or include tall buildings. As well as reflecting on the qualities of each scheme individually, the report analyses who lives in these schemes and how they experience them. The report examines the characteristics of residents and how this shape their views and concludes that many regard high-density/tall buildings not as permanent homes but rather as appropriate for one stage of their lives.

Delivering higher density suburban development: the impact of building design and residents' attitudes (Pablo Navarrette Hernandez, Alan Mace, Jacob Karlsson, Nancy Holman, Davide Alberto Zorloni, Aug 2021)
Published paper relevant to questions 2a, 3.

Outer London has a significant number of brownfield sites that are vital to delivering more housebuilding in London but local residents are often resistant to development. This paper explains the reasons for this resistance and tests whether the design of buildings can positively impact both the perception and acceptability of densification to residents of outer London boroughs – height is used as a proxy for density. The paper finds that while design on its own does not make higher density / taller developments more acceptable, residents can be brought onside if they see the development as part of a wider picture (like tackling the housing crisis) and are convinced of the 'need' for it to happen in relation to that wider picture.

Cities and Energy: Urban Morphology and Heat Energy Demand (LSE Cities and other authors, March 2014)
Published report relevant to question 2e.

This report looks at the heat efficiency and spatial configuration of four European cities, including London. It compares different kinds of buildings within and between these cities and finds that taller buildings with a higher density of residents are the most heat efficient and that density can be used as a predictor of residential energy demand.

High Rise Hope Revisited (Laura Lane, Anne Power, Bert Provan, October 2014)
Published report relevant to question 1b, 1c, 2a, 2d, 2e.

This report is a follow up to a previous report that tracked the impact of an energy-efficiency retrofit of three council-owned residential towers in West London. The project sought to tackle problems in the towers dating to their design in the sixties and seventies while also refurbishing communal and residential areas. It also provides information of the makeup of the residents themselves and their experiences of living in these towers before, during and after the retrofit.

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May 2025

If you have any questions, you would like more information or you'd like to speak to the authors of these reports, papers and blogs, please contact us at XXX and at XXX

Kind regards,

Kath Scanlon
Distinguished Policy Fellow
LSE London

Ellie Benton
CASE Research Officer

Briefing note on issues relating to Commonhold and suggested solutions

Tall Residential Buildings Research Group

August 2024

Executive summary

Research by an informal network of London-based academics from the LSE, architects and practitioners is promoting a significant review of residential leasehold legislation and regulation. The current approach is proving inadequate to cope with the complexity of managing and maintaining the many high-density, including high-rise, blocks of flats built since 2000.

Issues include:

- Setting service charges and sinking funds – costs have risen significantly since the flats were completed, creating hardship for purchasers on moderate incomes
- Agreement on day to day building repairs, cyclical maintenance and replacements of building components is difficult to achieve in blocks with multiple leaseholders
- High levels of leaseholder dissatisfaction with managing agents relating to costs of their services, poor quality provision of management information, poor consultation procedures etc.

To address these government should:

- **Boost service charges information:** Government should use section 21 of The Housing and Regeneration Act 2008 to make regulations to improve the provision by landlords of service charge information to tenants and leaseholders.

- **Improve best practice for setting service charges:** Government should provide and regularly update best practice guidance for setting service charges and contributions to sinking funds.

- **Require lifecycle cost plans:** Developers should prepare a full lifecycle cost plan for high-rise housing schemes and make these available to purchasers. Freeholders should then have a duty to maintain these.
- **Ensure developers endow sinking funds:** The current system means that leasehold management companies are wholly reliant on the income they get from leaseholders through service charges.
- **Ensure there is liabilities guidance for purchasers:** Would-be purchasers should be provided with better information on their rights and obligations before committing to buy.
- **Review and enact the recommendations of the ROPA report:** This made a range of proposals including establishing a regulator of leasehold properties and a code of practice for managing agents.

While proposals in the Leasehold Reform Bill 2024 and plans to introduce Commonhold are welcome we believe that they will not on their own resolve issues of managing and maintaining large complex buildings that face current leaseholders and future "commonholders'. Without wider action, they actually risk worsening the problem.

Tall Residential Buildings Research Group
August 2024

INTRODUCTION

This briefing note by the Tall Residential Buildings Research Group (TRBRG) suggests a range of changes that need to be made if the proposed form of ownership for new flatted developments – Commonhold - is going to be successful. These changes must address the complex issues relating to recent high-rise and high-density housing, built for sale with large numbers of dwellings and a range of occupants, some of whom own and occupy their home on a lease and others who rent from the leaseholders of individual properties.

Issues around being a leaseholder have been well documented and in response the last government considered legislation to replace the current freehold/leasehold ownership model for new blocks of flats with Commonhold[2]. The current government has picked up the previous proposals and is intending to bring in legislation so that Commonhold becomes the standard form of ownership for flatted developments. Commonhold means that all the owners of individual flats[3] in a block will hold the ownership of the whole of the block jointly (in common) rather than the ownership of the block being separately owned by the freeholder, with owners of individual flats holding a leasehold interest in their home.

While we believe that commonhold is likely to be an improvement on the current freeholder/leaseholder arrangements we are absolutely certain that this change on its own will not resolve issues leaseholders are experiencing related to:

- rising service charges as a result of rising costs
- potential issues around the quality of construction of complex buildings

[2] Commonhold first became legal in the UK in 2002 but there are currently only a total of 184 commonhold properties, making up 0.01% of total stock[2]. Currently, the commonhold system is not attractive to developers, and there is also a lack of understanding about how it works in practice.
[3] We have used the term flat to cover flats, maisonettes, triplexes and any other form of housing unit contained in a residential block with multiple units.

- lack of regulation of managing agents

It is worth noting that there are risks to introducing commonhold. While commonhold is a more democratic approach to managing property than the current freeholder/leaseholder model it doesn't rule out issues around disputes on costs of planned works or managing agents' fees and performance or the complications of some owners of properties renting out their homes and being difficult to contact. These challenges are being experienced by leasehold management companies that jointly own the freehold of their block of flats. (They also find it difficult to identity suitable leaseholders prepared to sit on a management board). It is also unclear how commonhold will work on buildings with commercial elements such as shops on the ground floor.

In addition, some of the better freeholders currently, such as some housing associations, use their multiple ownership of properties to negotiate better building insurance costs – an area where costs are currently rising significantly. In some cases, they will use their financial resources to ensure urgent repairs are undertaken in advance of recovering costs or to front fund the costs of legal action against recalcitrant leaseholders. These advantages will not be available under commonhold.

It is worth noting that in Scotland, which has a system similar to commonhold, it is estimated that 50% of all flatted buildings are in disrepair. Further research is required on the reasons for that, but any or all of the above issues may be contributory factors.

THE TALL RESIDENTIAL BUILDINGS RESEARCH GROUP (TRBRG)

The TRBRG is an informal network of London-based academics from the LSE, architects and practitioners, established in 2021. It was formed in response to concerns about new housing in London and elsewhere in the UK being built at much higher densities than in the past, with many more flats in each block and an increasing number of high-rise residential buildings (10 storeys or more).

TRBRG released their joint publication "What is the future of high-rise housing? Examining the long-term social and financial impacts of residential towers" in February 2023 (www.high-rise-housing.co.uk). The Group has actively sought to discuss the report's findings with those involved in the planning, development and future management of high-rise housing.

In 2024 the LSE held three seminars exploring issues relating to high-rise housing. This included a seminar on leasehold and commonhold housing, addressing the question of whether the introduction of commonhold will in itself resolve the potential long-term issues associated with high-rise housing. This note draws on the findings from our publication and from the seminar held with an invited group of experts and practioners with a particular interest and expertise in the management of high-rise and high-density housing.

BACKGROUND

Leasehold is the home ownership arrangement where a property owner (leaseholder) has a legal agreement with the landlord or freeholder to own the property for a set number of years - ownership of the property returns to landlord when the lease comes to an end. It has been heavily criticised in recent years largely as a result of the freeholders right to charge a 'ground rent' to the leaseholder with the level of the ground rent sometimes being seen as unreasonable. While the freeholder has the responsibility for managing and maintaining the building (but not the inside of each leasehold flat) all

the costs of this are legitimately recovered from the leaseholders through service charges. Freeholds of blocks of flats are often sold to investors, as the income stream from ground rents is steady and reliable. The individuals and organisations buying the freehold do not need to have any expertise in property management.

In 2022 the Leasehold Reform (Ground Rent) Act put an end to ground rents for most new residential leasehold properties in England and Wales. This means that there will no longer be a long-term income stream from ground rents. Developers of new high-density housing are now faced with either owning the freehold of the new housing long-term or passing the freehold onto to a variation of a leasehold management company[4]. The introduction of commonhold as the default ownership model will mean that at the completion of a new development and when all the homes in the development had been sold, the owners of the new homes would own the development jointly (in common) with the rights and obligations this involves.

CONCLUSIONS RELATING TO THE MANAGEMENT AND MAINTENANCE OF HIGH-RISE, HIGH-DENSITY BUILDINGS

While commonhold resolves aspects of the freehold/leasehold model it doesn't remove issues relating to:

- Setting service charges and sinking funds
- Making decisions on day to day building repairs, cyclical maintenance and replacements of building components
- The arrangements for managing the block – it is likely that most commonhold organisations will chose to use managing agents as is currently the case in freehold blocks. There is no system to assess the capabilities of managing agents and regulate their activities. TRBRG found evidence of high levels of leaseholder dissatisfaction with managing agents relating to costs of their services, poor quality provision of management information, poor consultation procedures etc. This leads to high levels of turnover of managing agents.
- Establishing and maintaining some form of management committee, drawn from the leaseholders, to oversee the management and maintenance of the bock. These are voluntary roles, which nevertheless require significant knowledge and time commitment, and there is some anecdotal evidence that leaseholders have been put off taking on these roles where there are disputes over costs, repair work and the performance of managing agents.

High-density flatted blocks continue to be the predominant form of new housing in cities and increasingly in popular commuter towns. TRBRG therefore, consider it important to ensure that new flatted housing is built in a way which means the homes provided will be valued by their occupants and be easy and cost effective to maintain by their owners. The housing should be built to last, which includes it being built in a way where the housing provided can be modified to meet changing needs overtime. Currently, leaseholders are taking on 250-year and 999-year leases without any clear understanding of the longevity of the buildings they are buying into.

Those buying high-density housing need to be better informed at the time of purchase about the likely costs of managing and maintaining their homes, and leaseholders – potentially commonholders in future - need better information about their legal and statutory obligations.

In this context TRBRG found that:

[4] In this context a 'leasehold management company' becomes the freeholder of a block of flats with all the leaseholder of homes in the block jointly owning the freehold (essentially something similar to commonhold).

- The rights and obligations of leasehold purchasers are not well understood by those buying homes in high-density developments, and there are limited requirements on those selling homes, or on solicitors and conveyancers acting for purchasers, to provide clear information before purchase. This will remain the same for commonholders unless changes to the legislative/regulatory framework are made

- Developers are not currently obliged to provide accurate information on the likely long-term costs of maintaining and repairing the homes they are building (including a plan for replacing building components as their life expires). Leaseholders are provided with service charge estimates at the time of purchase, but these are not supported by information on longer-term costs. There is evidence of significant increase in service charges on recently built flats since the initial sales.

- There are also no obligations on developers to ensure that buildings are specified and constructed so as to be easy to maintain and repair. This is, however, a consideration for the long-term owners in the Build to Rent market, who are incentivised to ensure running costs over time are affordable (although only within the span of a typical 25-year business plan)

- The current regulatory framework for the design and construction of high-density housing – including planning requirements, Building Regulations and related standards and guidelines – is complex and sometimes contradictory. Taller buildings and many lower rise, high-density buildings, are already inherently more complex and have more demanding performance requirements than other buildings. The two factors together make it more difficult to build, maintain, upgrade and refurbish such buildings in a cost-effective way. The construction industry needs to rethink how best to build densely and at height. There are new approaches being developed (or transferred from the commercial sector) but these need to be underpinned by better research and development and supported by legislation and guidance.

We concluded that while high-rise/high density housing may be perfectly satisfactory for wealthier purchasers and those deciding to rent a flat on the market (generally for a relatively short period), living in these buildings can be more problematic for leaseholders on moderate and modest incomes and for shared owners. This group cannot easily cope with rises in service charges and sinking funds and unexpected additional costs (like those many are currently bearing as a result of the concerns over external cladding). This is not an issue exclusive to high-rise housing, but it becomes more acute with increasing height and density, and the associated complexity of construction and future access for maintenance.

It is difficult to see how high-rise housing and much of the recent high-density blocks of flats could provide sustainable homes for leaseholders on more modest incomes, given that maintenance expenditure will need to increase overtime to keep the properties in good repair. The post-Grenfell experience has shown that many leaseholders are struggling to meet repair costs, and such challenges are likely to continue as buildings age. If these buildings fall into disrepair, then government—whether local or central—may be forced to step in.

RECOMMENDATIONS

TRBRG made a range of recommendations in our original publication relating to reviewing the rights and obligations of leaseholders and improving their protection at purchase of their home. We also made a number of important recommendations about the construction of this type of housing which we have not referred to in this note but which are nonetheless very important in creating housing that will last and will be less expensive to manage and maintain than much of the housing being built currently.

Our current recommendations are:

- **Boost service charges information:** Government should use section 21 of The Housing and Regeneration Act 2008 to make regulations to improve the provision by landlords of service charge information to tenants and leaseholders. This requirement should include social landlords.
- **Improve best practice for setting service charges:** Government should provide and regularly update best practice guidance for setting service charges and contributions to sinking funds.
- **Prepare lifecycle cost plans:** Developers should prepare a full lifecycle cost plan for high-rise housing schemes and make it available to purchasers. It should contain a breakdown of the principal structure, fabric and services, giving the anticipated life of components and the cost of replacement at current pricing.
- **Adopt lifecycle cost plans:** Freeholders should have a duty to maintain a lifecycle cost plan provided by the developer and ensure it is updated at least every five years, provide this information to leaseholders and to any prospective purchaser of a flat for sale.
- **Endow sinking funds:** When passing the freehold interest to a leaseholder company (or commonhold company) the developer should endow a substantial initial tranche of the sinking fund to underpin the long-term viability of the leaseholder company. The current system means that leasehold management companies are wholly reliant on the income they get from leaseholders through service charges. This makes it very difficult to deal with non-payment of leasehold charges - are these costs are legitimate charge on other leaseholders? Alternatively, or in addition, a one-off payment to the leasehold company should be made by any purchaser of a flat.
- **Develop liabilities guidance for purchasers:** The legal profession should establish best practice guidance for those acting as conveyancers to prospective purchasers so that purchasers are made more aware of the liabilities they will be assuming in purchasing a leasehold or commonhold interest in a high-rise housing scheme. Those using this guidance could be kite marked as a way of helping would-be purchasers select a conveyancer.
- **Review the recommendations of the ROPA report[5]:** This report proposed that property agents, including managing agents of properties be regulated by an independent regulator with mandatory qualifications for managing agents and a code of practice. The report included proposals for:
    - the scope of a new system of regulation
    - a new licensing regime
    - a framework for codes of practice
    - mandatory qualifications
    - transparency and use of leasehold and freehold charges
    - the set-up, functions and relationships of a new regulator
    - assurance and enforcement under the new system

As a first step in considering these recommendations we would suggest that the government undertakes further independent research on leasehold property, in particular around the high-rise/high-density residential buildings developed since 2000 to better understand the current picture in terms of:

- how such housing is managed
- how service charges and sinking funds are set and calculated

[5] REGULATION OF PROPERTY AGENTS WORKING GROUP - Final Report, July 2019

- the obligations of leaseholders to pay for ongoing management and maintenance
- the responsibilities of managing agents and leasehold management companies

Government should then consider what changes to legislation and regulation need to be made to improve the position of existing leaseholders and future commonholders.

LONDONASSEMBLY

May 2025

Sally Pannifex Ref No. 006

Dear Scrutiny Panel

In light of repeated failure of landlords like Clarion to maintain + repair properties I fear for people being housed in tall buildings.
A work colleague is in a tall building with 3 different lifts and reports one of them is always out of order. What guarantees are in place to ensure the residents have reliable and safe access?
The financial cost of building then maintaining them is excessive let alone the embodied carbon they emit.

Londoner's skyline has been overwhelmed by this type of building so that the beautiful architecture of the pre modern era is drowned out by steel and glass. The lack of regulations and greed of developers leaves the public ripped off. There is already an abundance of housing (empty luxury flats and run down boarded up council properties waiting to be " regenerated ".
These schemes just replace affordable human centred homes with poorly built unaffordable housing + the planet and rising homelessness pay the price.
The fact that my 3 bedroom ex council freehold home with balcony, garage, court yard garden and access to park like grounds in zone 3 is worth less than a 1 bed flat in these new high rise developments is crazy . The shared ownership model being limited to new builds just inflates the price of these properties.

We are in a climate emergency where we should be conserving energy. I put it to you that we don't need or want more high rises for land bankers to gobble up. We need tax breaks on refurbishing and homes that don't require lifts. We need smaller scale well designed homes that use permaculture principles that harness nature and boost the health and well-being of those who live in them.

Tall buildings are ugly dehumanising and depressing. Why don't you have awards to come up with green adaptions to the main types of dwellings we have already to insulate them and make them more liveable?
Rather than contemplating building more you should focus on fixing the dangerous cladding and tighten regulations so that we don't end up with a repeat of the Grenfell Tower tragedy.

LONDONASSEMBLY

May 2025

Tonic Housing Ref No. 007

Tonic staff and residents discussed the London Assembly consultation on tall buildings:

Tonic Housing is the UK's first provider of LGBTQ+ affirmative retirement housing. Tonic@Bankhouse is a retirement community comprising of 84 affordable apartments over 14 floors, located on Albert Embankment in the iconic area of Vauxhall, Lambeth. Tonic owns 19 of these 1 and 2 bed apartments for Shared Ownership sale and for rent. The building is shared with Riverside, a social landlord, who have 59 rental apartments and 6 shared ownership apartments. Care Outlook provides the personal care and support services on-site. We are working closely with them to bring our unique LGBTQ+ affirming support and activities to life.

1. Who lives in tall buildings in London and what are their experience of doing so? In particular:

b. What are the key benefits and challenges experienced by residents living in tall buildings?

The benefits: Less traffic noise. Tnic have created a community in a tall building. Security is ensured because there is no open access. Residents prefer the shared high-ride living to previous housing which included long communal walkways. The communal lounge and gardens offer spaces for the community to meet. Residents can get to know their neighbours, because Tonic has brought people together specifically for an LGBT+ retirement community. Location is important, near cultural spaces, amenities, shops and transport.

The challenges: Lifts not working. Service lifts would be useful. Extra care scheme makes it a different scenario, living with outbreaks of bed bugs, some anti social behaviour.

c. Do tall buildings impact residents' mental and physical well-being compared to other types of housing types?

'Better for my mental health'. The view of the river, the garden and can knock for neighbours. Don't have to worry about the upkeep of an old building, with a new build.

a. How do those experiences differ amongst different groups, including students, families, older people, and disabled people?

May 2025

Vertigo may be a challenge for some. Need good lifts. Some are scared of lifts and there is the stress of lifts going out. Children and family may be challenging, young people may attract trouble but they would enjoy high rise life. Some residents doubted that vulnerable people should live in tall buildings with only one staircase.

2. How do tall buildings contribute to or detract from the creation of inclusive and thriving communities in London? In particular:

How do local communities perceive tall buildings in their areas? Generally well received. Surrounded by other tall buildings.

b. Are there examples of good tall buildings in London? What features make them successful?

Tonic is a good example. Any building with two staircases and more lifts. Shard? Barbican?

c. Are tall buildings helping to meet London's housing need?

Yes, but at what cost. There needs to be good infrastructure, to GP surgery, regular bin collections, good schools, quality of materials. Need gardens and balconies.

d. Are there any particular tenures where tall buildings have been most or least successful?

Shared ownership helps, when people buy then the building has a better reputation. All ownership would be better. Care facility depends on the lift. Stay put policy with one staircase is challenging for a care facility.

e. What are the environmental and energy impacts of tall buildings compared to other typologies?

Ventilation: overheating needs better ventilation. Windows don’t open wide in tall buildings. Concrete may not be environmentally friendly.

LONDONASSEMBLY

May 2025

London Borough of Tower Hamlets Ref No. 008

Dear Annabel,

Please find below links that specifically will help with your questions.

Please have a look at the High density Living Supplementary Planning Document, specifically the section on how the document was developed. This provides information about how residents were engaged, and you might find it useful.

A little more info on the SPD here High density living | Let's Talk Tower Hamlets to help how the council has developed policies to assist.

230523_Frame_IoD&SP CDP_Handbook copy – more specifically refer you to this Community Development Panel that reviews schemes in the Island and made up of local residents who shape development in the area and these tend to be complex, tall and dense development.

Kind regards
Sri

LONDONASSEMBLY

May 2025

Building Stock Laboratory Energy Institute Ref No. 009

London Assembly Planning Committee,
investigation into planning and tall buildings

Evidence from the Building Stock Laboratory, Energy Institute, University College London

This is a response to the London Assembly Planning Committee's call for evidence to their investigation of planning and tall buildings. We are Philip Steadman, Daniel Godoy-Shimizu and Ian Hamilton of the Building Stock Laboratory at the UCL Energy Institute. We work on energy use in the UK building stock and the resulting CO_2 emissions, and have advised and are advising the GLA, the Department of Energy, and several London boroughs.

Our evidence relates to the issue listed under item 2 in the call: 'The environmental and energy impacts of tall buildings'. We have also worked on ways of achieving very high densities in low-rise developments, relevant to the planning issues listed under item 3.

LONDONASSEMBLY

May 2025

We have made detailed studies of energy use and height in UK offices and residential buildings, most of them in London. We have measured their *energy intensities*: the amounts of electricity and fossil fuels used per square metre of floor area per year. The sample of offices included 600 buildings of heights ranging from 2 storeys to over 30 storeys, of dates ranging from pre-1900 to the present. some air-conditioned, others mechanically and naturally ventilated. We used actual consumption data, not computer energy modelling, which has not in general been reliable in simulating the performance of tall buildings.

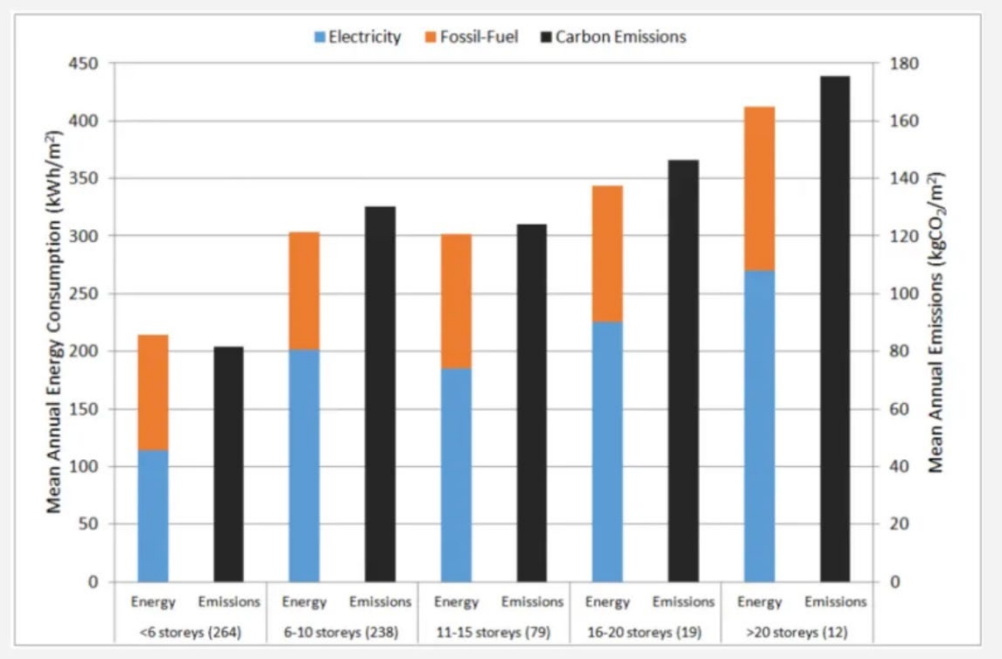

Figure 1: Energy use (kilowatt hours per square metre) and carbon emissions (kilograms of CO_2 per square metre) in 600 office buildings of different heights. Blue = electricity; orange = fossil fuels; black = carbon emissions

The results (Figure 1) showed that going from 6 storeys or fewer, to 20 storeys and greater, electricity use (blue) in the high-rise is nearly two and a half times greater than the low-rise (a 135% increase). Fossil fuel use (orange) is increased by 40% over this height range. Carbon emissions per square metre (black) are more than doubled going from low-rise to high-rise. The magnitude of this effect was unexpected and had not previously been demonstrated.

The effect was *not* attributable to the high-rise being air-conditioned and the low-rise not being air-conditioned. Energy intensities are increased by air

conditioning in all height bands. But the increase in intensity with height is seen both in naturally and mechanically ventilated, and in air-conditioned buildings.

For residential buildings we were unable to obtain meter data at the dwelling level. Instead, we used energy use data aggregated to the level of Lower Super Output Areas (spatial units used for Census purposes, containing typically 400 to 1200 dwellings) in twelve London boroughs. Total numbers of floors in these groups of buildings were compared with total annual gas and electricity use. By contrast with offices, the results showed only a small increase in the intensity of electricity use with height, but a very marked increase in the intensity of gas use. This is to be expected, since the predominant use of energy in dwellings is for space heating, generally by gas. We are currently planning new work on energy and height in residential buildings, for which we hope to obtain meter data at the dwelling level.

Our belief is that these results are to be explained by the greater exposure of tall buildings to the elements as they rise above their neighbours. Wind speeds increase appreciably with height above ground. Air temperatures decrease with height. These effects in combination can increase the demand for heating. Meanwhile in summer, tall buildings are exposed to greater solar gain, increasing the demand for air conditioning - especially in those with glass curtain walls. More research is needed however to test these hypotheses.

This picture will change in the coming decades with the effects of climate change and policies to mitigate warming effects. As electricity generation transitions to renewables and nuclear, carbon emissions from electricity use will drop, and fossil fuels will be phased out to be replaced by electricity. This will not however directly affect excessive energy intensities in high-rise due to exposure, compared with low-rise. Warmer temperatures lower the demand for space heating in winter: but much more important is the increased risk of over-heating in summer, which is greatest in high-rise flats. This will increase the demand for air conditioning, which is presently rare in residential buildings.

We have also studied the relationships of built form to density. We have a detailed three-dimensional model, on a map base, of all buildings in London out to the M25. (A version of this model was supplied to the GLA and is online as the London Building Stock Model.) Since this has floor area data for the buildings, and site boundaries, it is possible to calculate densities (floor area/

land area) precisely. This makes it possible to measure densities for very large samples of residential and commercial buildings empirically, and to show for example that similar densities are achieved in 5 and 6-storey squares and terraces in the West End as in 15-storey towers in the City. It is not always true that tall buildings are the only means of raising densities. We have shown how the same amounts of floor area provided in some recent high-rise developments in London could in theory have been provided in lower-rise schemes on the same sites.

Further information is available on the Energy Institute website:
https://www.ucl.ac.uk/bartlett/energy/news/2017/jun/ucl-energy-high-rise-buildings-energy-and-density-research-project-results

And in two academic papers:
https://www.tandfonline.com/doi/full/10.1080/09613218.2018.1479927
https://pdf.sciencedirectassets.com/277910/1

The London Building Stock Model is at
https://www.london.gov.uk/programmes-and-strategies/environment-and-climate-change/energy/energy-buildings/london-building-stock-model

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Working in partnership

Submitted via email: scrutiny@london.gov.uk

05 March 2025

FAO The London Assembly Planning and Regeneration Committee

RE: Call for Evidence: Planning and Tall Buildings

Please see below the responses from Be First, on behalf of Barking and Dagenham Council, to this Call for Evidence.

How do tall buildings contribute to or detract from the creation of inclusive and thriving communities in London? In particular:

a. How do local communities perceive tall buildings in their areas?

Whilst we are aware, and do hear comments from the Borough's residents, that proposals for some buildings are too tall, we have generally found that working closely with community groups through the design development process has led to communities to be more understanding of the need in the appropriate location and context (and designed in sensitive ways). Explaining the balance between height, density and delivering affordable homes has also played a key part in developing this understanding. Usually, tall buildings are located close to good transport connections or where previous tall buildings have been demolished.

We have also heard from residents that aspects such as undisturbed views of the sky, good access to light, balcony space, access to green/blue infrastructure, and car parking all contribute to their perception of a residential buildings. These are issues that particularly need to be considered for tall buildings, re-emphasising the role that good design, with supporting social infrastructure and connectivity play in garnering community support.

On parking specifically, there is still work to be done on the public acceptance of lower or zero parking levels. This is particularly an issue for tall buildings due to a reduced space for parking (noting it can be one of the main objections to tall building applications), but it is also a more general issue too given the London Plan's push for car-free development. As part of this, promotion of (and access to) public transport or other alternatives to private car ownership is key.

b. Are there examples of good tall buildings in London? What features make them successful?

Gascoigne West Phase 2, LBBD, White Arkitekter (9-20 storeys)
Successful because:

- interspersed with townhouses
- at the edge of a park
- close to good transport connections
- tall buildings form external courtyard spaces protected from the main road
- closely controlled microclimate e.g. existing and new trees and building orientation
- high quality façade materials and detailing e.g. full height loggia

c. Are tall buildings helping to meet London's housing need?

Yes. We simply wouldn't be able to get near the Borough's contribution to the housing need requirement without building tall buildings/at increased density. This is partly due to general land availability, but also because of aspects like planning constraints and preserving the low-rise character prevalent in other parts of the Borough that haven't been identified as suitable for tall buildings (e.g., the Becontree Estate, a non-designated heritage asset, is predominantly terraced housing).

d. Are there any particular tenures where tall buildings have been most or least successful?

Not in our experience. LBBD build tenure blind, mixed tenure communities.

d. What are the environmental and energy impacts of tall buildings compared to other typologies?

Typically, tall buildings have a higher form factor, contributing to higher heat loss and less energy efficient buildings. Tall buildings also use more carbon intensive structural materials. Keeping structures light weight and avoiding incorporation of basement spaces can help to reduce embodied carbon in tall buildings. Tall buildings also have a greater impact on the microclimatic environment. Careful consideration in needed to avoid creating hostile amenity spaces and pedestrian areas, e.g. from wind and excess shading.

What improvements or changes should be made to the way tall buildings are planned and approved in London? In particular:

a. How are the wider impacts of tall buildings considered by Boroughs when granting planning permission?

As LPA, we consider the design and townscape impacts vs the public benefit associated with the proposed development. Often regard will be made to how the tall buildings respond to other tall buildings, impacts on local views, heritage assets, local character and

how such buildings would operate in relation to sustainability, servicing, access etc. As part of this, tall buildings proposals should:

- be designed to sensitively mitigate against local microclimate impacts.
- have regard to daylight and sunlight impacts to existing properties and key area of public realm and open space.
- mitigate wind impacts and these should inform the design of individual buildings and clusters of tall buildings to ensure that streets and ground level activities are not adversely impacted.

It is acknowledged that tall buildings often provide an important opportunity to locate much needed homes within accessible and sustainable brownfield locations.

b. How are the wider impacts of tall buildings considered by the Mayor of London when granting planning permission?

Often 'tall buildings' are not perceived as tall and outside of LVMF or heritage designations would have no strategic London-wide impact. As such, it is our view that the referral requirements should be reconsidered. Stage 1 and 2 GLA referable application thresholds should be changed to reflect a redefined threshold for what is considered to be a tall building.

c. How should the new London Plan (and local development plans) accommodate tall buildings as part of a mix of housing typologies?

Design and character are essential elements to get community buy-in for housing projects. Added to this, the Borough (and London as a whole) is also working towards very high housing requirements. Both of these factors suggest that a more flexible approach is needed to tall buildings and building typology.

From a plan-making perspective, design, quality and safety should be at the forefront of policy, with aspects such as maximum height less important a consideration in planning terms. Furthermore, we found through our experience at the Barking and Dagenham 2037 Local Plan examination that the current London Plan requirements for maximum heights were overly constrictive, and we would have welcomed more flexibility (again centred around good quality/design) in this area.

From a development management perspective, we have the following recommendations for the New London Plan. The New London Plan should:

- better accommodate for the assessment and mitigation of micro-climate impacts and accommodate for worsening climatic conditions as climate extremes worsen.
- strengthen the strategic protection of key views across London beyond those defined by the LVMF. This could be done by designating new protected views, or better defining the location of locations for clusters of tall clusters

- given the strategic nature of the London Plan, redefine the definition of tall buildings to a much higher threshold. Local planning authorities should have more flexibility when providing their own definitions in their local area specific to borough characteristics, constraints and opportunities.

Response by Ealing Matters

London Assembly Planning and Regeneration Committee

Call for Evidence: Planning and tall buildings

1. Introduction

1.1. Ealing Matters (EM) is a borough-wide alliance of residents' associations and community groups whose aims are to raise awareness of how Ealing is changing and to help local people shape these changes and enhance their quality of life. This submission from Ealing Matters is a brief response to some complex questions posited by the call for evidence.

1.2. Unfortunately, EM only learned about the call for evidence a few days before the deadline for submission. We think the experiences in our Borough merit much deeper study than we have had time to give to it in preparing this submission. What follows is a rather hastily assembled account of the experiences of tall building in the Borough over the past 10 years. It has not been checked and verified to the extent we would like and Ealing Matters would welcome further discussion around this subject, and we would be pleased to contribute to any follow-up research on it.

1.3. For now, our submission looks at the experiences of tall buildings over the past 10 years in a Borough has been subject to some of the heaviest pressures from developers wanting to build tall buildings. Generally, our submission relies on the definition of tall buildings as is now used in the London Plan – 18 metres or 6 storeys. However, we do not follow this rule slavishly as neither does the Borough of Ealing as a whole.

1.4. Simply because of their prominence, tall buildings can be viewed too often in isolation of the wider issues that surround them. We don't go too deeply into the issues here, but discussion is needed as to the role that they play in the bigger questions surrounding meeting housing need in London, especially housing that is affordable and suited to the city's growing population.

1.5. The priorities of developers who are driving Ealing's development, and its housing growth in particular also need to be more clearly responded to, as should the

methods that they employ to secure consent for their burgeoning schemes. Our submission touches on these themes, although not in the detail we would like.

2. Background: The historic growth of Ealing as a London suburb

2.1. Its West London location with good road and rail communications to Heathrow, the Midlands, the West of England and Wales led Ealing to grow as a popular London suburb from the mid-1800s. By 1900 it had become celebrated as the Queen of the Suburbs – a brand that developers like to promote today as they market new developments overseas, not least their overbearing box like blocks of flats which many Ealing residents believe are destroying that very character.

2.2. Up until the past 10 years the over-riding land use in the Borough was very markedly for low rise and residential/family housing. These homes had mushroomed through the inter-war and post war decades, clustered around the Borough's seven historic towns and villages which are separated by the River Brent and generous open spaces.

2.3. Each of the Borough's seven towns developed its own quite distinct identity as they became popular locations for young immigrants to put down roots and raise young families. The Borough boasts a rich mix of communities, who range from central Ealing's comfortable middle class to the much more recent and ethnically diverse and vibrant Southall. Many residents have lived in the Borough for a long time and feel they have invested their lives here.

2.4. The main exception to the borough's low rise residential land use pattern was the development of nationally significant areas of primarily light industry warehousing in the north east corner at Park Royal and in the south west at Southall.

3. Tall buildings in the Borough

3.1. Until around 2014 there was just one building of more than 10 storeys in the Borough - an 18-storey tower designed by Richard Seifert on the edge of Ealing Town Centre. In 2010, the Inspector at the Glenkerrin Public Inquiry refused a 26-storey Norman Foster tower in central Ealing which he said was alien to the historic town centre.

3.2. Since then there has been an explosion of consents for new towers across the Borough. An important stimulus for these new towers has been Ealing's five Crossrail stations. Due to the improved connectivity Crossrail has brought them, the GLA has encouraged densification around the stations, and developers and Ealing Council have responded to their call with enthusiasm. While the principles underpinning this policy are undeniable, government and London Plan planning policies have always required that developments should fit into and respect the character of their locations, particularly, as in a Borough like Ealing, they impact on sensitive neighbouring uses and historic Conservation Areas. The London Plan's tall

building policy was designed to ensure this would be the case, but as described in our Waitrose development case study, these concerns have often been ignored.

3.3. Though anticipated to face extensive change, none of the Borough's five Crossrail stations have benefitted from area planning studies, such as action plans or master plans to ensure new developments worked well together in the wider public interest and supported by new hard or soft infrastructure. Instead, new buildings have been consented piecemeal, and the problems this is causing are already apparent.

3.4. The pressure for tall buildings in the Borough in the past 10 years has been intense and sustained. New London Architecture[1] reports that Ealing is one of just 10 London Boroughs with an emerging tall building policy a tall buildings threshold higher than the London Plan, and they show that Ealing has had the highest rates of tall buildings planning applications in London. NLA (page 41) shows that, in 2023, Ealing received more applications for tall buildings than any other Borough, accounting for 10 of the 68 (14.7%) planning applications for such schemes across London as a whole.

3.5. An analysis of planning applications by Ealing Matters found that in 4 years between March 2020 and April 2024, Ealing's planning committee approved 108 buildings of 10 storeys or more. No fewer than 40 buildings of 10 storeys or more were approved in the 12 months between September 2020 and September 2021. Given the highly constrained capacity of Ealing's planning department during this period, it is hard to believe that these schemes can have been given the scrutiny that they merited.

3.6. No doubt this is one reason why so many of these schemes have attracted intense local opposition from existing residents concerned that local planning policies were being routinely ignored. Council officers have been persistently accused of brushing aside objections that the London Plan tall building policies were not being complied with. This in turn is undermining trust in the integrity of Local Government in Ealing. (See the Waitrose case study in section 4 below)

3.7. While Ealing has consented a large number of tall buildings in the past 10 years it is notable that work on many of these has not commenced. There are signs, particularly in the past two years, of a falling away in the number of building starts, and on occasion, as is the case with Dean Gardens in West Ealing, of development halting during construction. There are also signs of significant land banking on the part of major developers. The Southall Gas works site is a good example. Consent was granted in 2010 for 3,750 homes yet by 2023 just 623 had been completed.

3.8. Many of Ealing's tall building developments result from the redevelopment of Council estates. We examine some examples of the issues that have arisen in Acton, and West Ealing below. Many of these renewal projects have not delivered the

[1] New London Architecture: **L**ondon's Growing Up: A Decade of Building Tall

outcomes that were expected and one would hope they will be properly evaluated before the Council presses ahead with redeveloping other estates in the Borough. As we show in the case of the South Acton Estate, they have led to the break-up of existing communities and, as in Sherwood Close, dangerous levels of social isolation. Despite no serious attempt to learn from the experiences, plans for further estate re-developments are due to intensify. Ealing's new Local plan envisages that 6 council estates in Northolt alone are set to be renewed, although no information is provided about the number of new homes they will deliver, nor for whom they will be designed.

3.9. History has shown how important it is to evaluate the experiences of major transformational changes such as the introduction of the tall building construction programme. The social impacts of slum clearance in the 1960s were too often shown to have been negative, characterized by widespread displacement of communities, disruption of social networks, and often relocation to isolated, low-quality housing developments. All this in turn led to a loss of community cohesion and increased social isolation. History has shown that slum clearance frequently worsened social issues due to poor planning and a lack of consideration for the needs of established communities. Our experience in Ealing suggests that many of these problems are being repeated now, and we should be aiming to avoid them.

4. Lessons from Ealing and our consequent recommendations

4.1. Though essentially a suburb of low rise family housing Ealing as a Borough has had some of the most extensive experience of tall buildings over the past 10 years. Ealing Matters believes that it is time to take stock of what has happened during that period and how much has been achieved.

4.2. There are important lessons to be learned. This section draws from the accounts of developments around the Borough that follow as the second part of this submission and it makes some suggestions for better planning for the future.

1. Tall Buildings in established low rise residential areas are extremely obtrusive. Their imposition on an established community leads to tensions between the community and the planning authority which in turn undermines trust in the processes of local government. This is a real problem that decision makers need to respond to with openness and candour.

2. Introduction of the tall building policy D9 of the London Plan in 2021 has helped to focus thinking on suitable locations for tall buildings. In Ealing consultants have prepared a tall building strategy which aims to respond to the London Plan, however neither the borough's planners nor its planning Committee take notice of it. Unfortunately, its policies have not been followed with an degree of consistency. This has been a further cause of distrust between the communities and the planning establishment.

3. More openness in the decision making process is required. Pre-application discussions in Ealing between developers and Ealing's planners establish the parameters for developments that come forward, but they are not disclosed even after planning applications are submitted. Advice and comments from the Borough's Design and Community Review Panels are not made public.

4. It was known for many years that Crossrail would likely lead to an intensification of development around the stations in the Borough yet no planning has been done to prepare for them. More area and master planning to integrate tall buildings into our predominantly low-rise borough should have been undertaken.

5. Ealing's tall buildings are doing little to address the needs of Londoners for housing they can afford. Instead of being designed to address their needs, Homes are being marketed as investment opportunities to overseas buyers, and land banking tailored to meet overseas designed is evident.

6. Far greater consideration of social and community needs before, during and after construction, among those who will occupy the tall buildings (especially those who have been decanted from existing estates) and those in the near neighbourhood. Responsive facilities management must be a requirement and its delivery enforced.

7. Residents in tall buildings require amenity space but it is not being provided. Community spaces should be community-led with the needs of the community put first.

8. Estate regeneration breaks up established communities causing similar problems to those that arose in the 1960s but no effort appears to be being made to understand and address them.

Part 2. Experiences of tall buildings from around the Borough

5. Experiences of tall buildings in West Ealing: The Waitrose development

5.1. Ealing has seen repeatedly the way that teams of professional advisers emphasise the benefits of their developments to their anonymous new occupiers while the impacts of the vast scale of their schemes on the built fabric of the established environment are brushed aside. For a Borough like Ealing which has grown up largely of two or three storey family homes, this very often sets them against the recipient communities into which they are inserting themselves. Anxious about the impacts of these mega schemes, campaign groups turn immediately to the Borough's elected councillors for support but are met with silence. The Council has suffered a series of expensive adverse cost awards and are reluctant to stand up to over-powerful developers. So the campaigners turn their attention to the GLA and their hopes rise on reading the GLA's initial 'stage 1' comments which raise concerns about height and bulk, only to be dashed at the key 'stage 2' decision point when they find the deputy mayor is content to allow the Council to make the decision.

5.2. This culminated at the end of 2024 in the public inquiry triggered by John Lewis appealing against the non-determination of their plans to redevelop their West Ealing Waitrose store. The development would deliver a 500m wall of tall buildings between 8 and 20 storeys high which would cut through West Ealing, a low-rise Edwardian suburb. The proposal was clearly contrary to the Borough's emerging local plan, it attracted almost 800 objections from nearby residents and was strongly criticised by the GLA at stage 1 and by the Borough's Design and Community Review Panels. Yet not only did the Council not determine it, it also declined even to appear at the public inquiry, leaving the well organised Stop the Towers campaigning group to raise £40,000 for professional support to argue against the scheme. No local councillors bothered to attend the inquiry and LBE's only contribution was made by a barrister (a KC no less) appearing on the first day to repudiate suggestions by the campaign group that the Council had abandoned the community.

5.3. The point here is that whatever benefits tall buildings confer they are often extraordinarily divisive. A failure on the part of local authorities and the GLA to manage the processes for consenting them transparently is alienating Ealing's established communities very seriously against the authorities who are supposed to represent them.

5.4. Political leaders clearly recognise the risks of their behaviour. In 2021 Council leader Peter Mason tweeted about the Waitrose development:

'*Our recently published new Local Plan sets out very clear guidance on a range of sites that we believe will be developed over the next decade. The guidance here was for a 7 - 13 storey development. I'm certain that this will still be too big for some. Those individual plans are supported by a lot of work that went into defining the character and heights of every part of the borough. All of this is done to give confidence to residents and to stop developers running away with themselves. All of this feedback has been given to the developers, directly, by Ealing's planners and politicians.*'

Mason continued: '*From now on communities will be in the driving seat when it comes to regeneration in Ealing. Local communities need to lead the process of change in our Borough, not developers. I want to ensure that local people know that their Council is on their side ... it feels like a big institution are trying to twist arms & bully through a scheme, that could be far better, through a precarious planning process using the ever-present threat of an appeal ... Ealing needs housing. This is true. So, we publish plans for a reason. To help guide developers and to give confidence to people about the changes happening around them*."

5.5. The Mayor made some similar observations in 2019:

' … I'm saying to councils, you've got to be respectful of the residents in your borough, the businesses in your borough. What you don't want is your borough being changed overnight so local residents and local businesses don't benefit.' [2]

Such are the pressures in Ealing that the Mayor's concerns are exactly what is happening. It is turning communities against the local authority in an unhealthy way.

6. Experiences of tall buildings in West Ealing (Sherwood Close)

6.1. Another conspicuous feature of tall building development has been the emphasis on the numbers of new homes that are to be provided while the needs of the eventual occupiers of these buildings are inadequately considered. The case of Sherwood Close in West Ealing provides examples. The following is one person's account.

Sherwood Close is now replacing the Dean Gardens Estate built as Council-owned housing in the 1970s. By the early 2000s Dean Gardens had become run-down and crime-ridden. Drug dealers had installed steel doors to their flat entrances. Anti-social activity, drug dealing, broken door locks and unmaintained lighting in public areas were commonplace.

[2] An interview by the BBC London News with Sadiq Khan in early July 2019

Ealing Council decided to demolish and replace the Dean Gardens Estate in 2009 with 292 new flats at the newly named Sherwood Close Estate, initially with Affinity Sutton, an old-fashioned housing association (HA), in conjunction with Lovells, the builders of Phase One. Planning permission was granted in 2015 for the redevelopment in three phases. Over the years the height of the blocks and the number of units have increased. The most recent planning application raised the maximum height of the development from 9 to 14 storeys.

Part of the plan was a generously sized community centre to be run by the new residents. The Dean Gardens Residents' Association (DGRA) Chair was a charming Greek mathematician. For thirty years she has fought very hard and bravely to try and prevent and deal with anti-social behaviour, drug dealing and safety issues.

The first phase of the new estate was completed and occupied in 2019. On the completion of the build of the first block, I was invited by the DGRA Chair to inspect the new development. Over two hours we collected 20 building faults which I reported on and documented, and over subsequent months I supported the Chair in trying to get them rectified. It took two years to get most of the problems resolved. With no resident caretaker/concierge dealing with suppliers was very difficult.

Unfortunately, in the interim, Affinity Sutton had been taken over by a larger HA (Circle Housing) which became a huge corporate ultimately named Clarion Housing, which is the UK's largest HA employing some 4,000 people. Clarion proved to be an unresponsive, unhelpful landlord. It took over two years to have many of the faults rectified. The Phase 1 builders were replaced by a new builder who constructed a second large block which is now complete and a new community centre in this second block was opened in October 2024 by the LBE Council Leader.

Rather than being run by the residents, Clarion has contracted with a charity – Nucleus Community Action – to manage it, with revenue generation seemingly being its primary goal. I was invited by the DGRA chair, now the Sherwood Close Residents' Association (RA) Chair, to attend a community meeting in the new Community Centre in January 2025. The new Centre proved to be a mean spirited 10 metres by 10 metres room. Over 40 residents crammed into it for the meeting – 10 could not be seated.

Although they were given weeks of notice, Clarion – the landlord – and Nucleus – the Community Centre manager - did not send representatives to the meeting. The final irony was that, to reserve the room for the community meeting, Clarion/ Nucleus sent the Chair of the RA a bill for £100 and a 30-page contract to sign.

The residents at the meeting came from a wide diversity of backgrounds. I spoke with a Brazilian man, a Portuguese lady and Muslim lady at the end of the meeting. Concerns about security and safety were voiced very strongly – anti-social behaviour, drug dealing, cars broken into and safety issues. Staggering echoes of the concerns raised in 2013 by Dean Gardens Estate residents. CCTV, lighting, broken door locks and shared areas parcel theft were discussed. The Chair urged residents

to write to Clarion with their concerns and to keep accurate records of incidents with time and date. Some residents had heating problems. One of them had to fight for a year to get the heating to work and to receive compensation. Many residents were unhappy with service charges. It seems Clarion demands payments, 50% of which goes into a repairs fund, the details of which are unclear. There was confusion about Council Tax Banding and some group research and action is needed to get some clarity on this. The flaws of the UK's unique flawed Leasehold system were revealed at the meeting. Many residents had problems with pigeon droppings and residents reported problems with rats and mice infestations as these modern 'as built' flats are not 'sealed' allowing mice and rats to find a way into flat after flat.

There is no resident caretaker and when a caretaker is on site, there's far too much for him to do – cleaning common areas for example.

Sherwood Close has unfortunately not yet built a community worthy of the name. In July 2020 the tragic story emerged of a woman with a mental health condition being abandoned by the system. After repeatedly notifying the authorities with requests for help, the woman's father's body was found in her flat having lain there for 3 months. She herself remained in the flat alone and withdrawn despite the repeated and urgent pleas on the part of the Chair of the residents' association.

When it is completed Sherwood Close Estate will be a big mix of tenures – social rent, shared ownership, shared equity, 'Affordable Rent' and private sales. Although the initial target number of homes was lower, the final total after Phase 3 is likely to be 362 homes. I don't anticipate completion before 2028. It will have taken 14 years to build.

There are multiple points to take away from the Sherwood Close development:

1. I think the Act of Parliament in 1988 which effectively had Local Authorities disposing of their Council house stock to housing associations (HAs) has been a disaster. HAs began life as small, local charities trying to house the poor. Emblematic of what HAs have turned into is Clarion Housing, which is likely to reach £1 billion turnover this year. From bitter experience Clarion is an unresponsive, uncaring behemoth.

2. The flaws in Leasehold contracts are very apparent. The Commonhold and Leasehold Reform Act 2002 has been largely unadopted. New legislation is in train for renters. Let's hope this is enacted and applies strict control over how much admin and service charges can rise each month/year.

3. Any tall residential building, irrespective of the tenure makeup, needs a live-in Caretaker/Concierge.

4. If you re-house problem individuals and problem families in new tall buildings, don't expect their behaviour to change. Unless there are significant

improvements in neighbourhood policing, social care, mental health services and social services generally, behavioural history will repeat itself.

7. Experiences of tall buildings in Southall

7.1. Southall is an Opportunity Area in the south west of the Borough. In 2014, to great fanfare, Southall's OA Planning Framework was launched. It featured introductory comments by Boris Johnson (then the Mayor) and the then Ealing Council Leader Julian Bell both praising Southall profusely. As a joint LBE/GLA initiative, the OAPF was a Supplementary Planning Document providing 'a development framework within which proposals are assessed to secure the highest quality development and ensure a comprehensive approach to the revitalisation of Southall'.

7.2. Based on a consultation called 'Southall's Big Conversation', the OAPF did – it still does - offer a good starting point for managing big changes confronting Southall including the redevelopment of the heavily contaminated 44.7ha Gasworks site and the arrival of Crossrail. 'At least' 6,000 new homes were promised that 'should complement existing context and incorporate heritage assets. Buildings will be predominately 4 – 8 storeys with some taller buildings to improve legibility to key locations'. There would be 'a mix of flats, maisonettes and terraces based on a mid-rise perimeter block structure', which 'will offer a sense of human scale, with a provision of well-designed shared open spaces.' Infrastructure improvements would include Berkeley Homes (developers of the Gasworks site) contributing £10m to widen the congested bridge over the railway in order to add a bus lane.

7.3. Soon after the ink on the plan was dry, Ealing's leadership set off on their annual pilgrimage to MIPIM where Southall's sites were marketed to developers, following which a flurry of 20 to 30-storey residential towers received planning consent. The 'Red Block Rebels' impression below gives an idea of how these will be built out as is happening already with many of them.

7.4. Other initiatives included a contentious CPO, in the name of regeneration, of active business premises around Southall Green to allow Peabody to put up more residential towers, and the abandonment of the Southall railway bridge widening. Southall people had no idea what was going on.

7.5. While the Planning London Datahub reported in 2023 that -106 (sic – yes that should read minus 106) affordable homes had been built in the OA since it was designated, those 6,000+ planned new homes have risen to 15,250 in the new Ealing Plan. If they are all built out, they will surely create West London's version of Paris's banlieues. But who knows how many homes there will eventually be? Berkeley Homes, which is marketing its flats in Hong Kong, has managed to build just 623 of the 'much needed' 3,750 homes it gained consent for in 2010. Undeterred, they're now saying they're going for 3,000 more.

7.6. While there appears to have been little progress in delivering affordable homes in Southall, development either side of the railway is proceeding apace with new towers seeming to spring up almost on a weekly basis. Below are the observations of a lifelong Southall resident.

Southall residents argue that tall buildings are simply alien to the Southall community, which comprises a rich and vibrant mix of Afghani, Somalian, Goan, Sri Lankan and eastern European residents. They say that Southall has successfully absorbed so many newcomers because it is a street-based society with these different groups living next door to one other in their densely built terraced houses. The town is very densely populated, and its services are close to breaking point. There could very easily be disputes between its different groups with their high levels of poverty indicators. That there are not is because people come out of their houses up and down roads, passing their neighbours (who most likely do not share their culture, language or religion). It is the mere act of mutually acknowledging one another that takes away the social fear of unknown people. This is not the environment that you will experience in tower blocks/tall buildings where people are separated from each other, never knowing who lives above or below or next door. These types of living arrangements for such communities is what breaks relations and cohesion begins to crumble.

Southall people also complain that the new flats in the tall buildings are not affordable and cannot anyway be accessed by local people. They are being openly advertised for sale in Hong Kong and Singapore and videos of such marketing can be easily found. One personal account is of a Southall resident approaching retirement age and wishing to care for his elderly 90-year-old father, who considered selling his family home to buy two adjacent flats in a new tall building at The Grove High St, Southall UB1, which overlooks Southall Park. He was surprised and disappointed when he got no response to his inquiries about the property from the agent. He concluded that the estate agents had no interest in selling to a local person willing to pay the full market price for them.

The conclusion amongst the Southall community is that the new developments in their town are not being built to address their housing needs. They are being pitched for sale at much higher prices than ordinary existing flats in the area.

8. Experiences of tall buildings from North Acton (Friary Park)

8.1. Friary Park in North Ealing was built for private sale in the 1980s as 225 houses and maisonettes rising up to four storeys. A turn in the market led Ealing Council to take over the estate which it used for social housing and it developed into an established community.

8.2. In 2018 it was decided to redevelop estate on the grounds that the 1980 homes were poorly insulated and could not be viably refurbished. The new development proposed was for a total of 990 flats (237 (24%) for social rent and 753 (76%) for private sale). These would be provided in six tower blocks of between 14 and 24 storeys.

8.3. The planning application for the new development attracted 209 local objections, with the nearby community particularly concerned about the height, bulk and density of the new flats, and the inadequacy of the proposed housing mix to respond to the need for more social housing. Their concerns were overridden by the need to increase the delivery of new housing on this 'underutilised brown field site'.

8.4. The Friary Park project has evolved significantly from the one that was approved in 2019, and changes are still ongoing. In 2022, the developers obtained consent to increase the total number to 1228 flats but offered no additional social housing. This meant that the proportion of social housing fell to 19% of the total. Now, in 2025, a third planning application is under consideration for the final phase of the development. If approved, this will increase the total number of homes on the development to 1,345, of which the number of social rented flats will reduce to 152 units or just 11% of the total. The heights of the towers have been raised to accommodate the additional units.

8.5. Exacerbating local dissatisfaction amongst the nearby community whose skylines have been transformed by the new towers is the fact that the developer, Mount Anvil, are marketing the new flats abroad as investment opportunities. The idea that the development is contributing to providing homes for Londoners or dealing with Britain's housing crisis is seen as laughable.

8.6. The reduction in social homes has raised fierce objections from the campaign group Cap the Towers – this video https://www.youtube.com/watch?v=tj2oMO1MJJk flags up the extent of the problem and highlights the way that the new units are being marketed.

Friary Park accommodation changes over time

Tenure type	Original estate	Planning applications		
		2019	2022	2025
Social rent	225	237	237	152
London Affordable Rent	0	0	0	163
Shared Ownership	0	0	0	140
Private	0	753	991	890
TOTAL	225	990	1,228	1,345
Social rent as % share of total	100	24	19	11

9. Experiences of tall buildings from South Acton (South Acton Estate)

9.1. The South Acton Estate was quite a typical 1960s council housing development with blocks rising up to around 10 storeys. Residents were not notably affluent, and the estate experienced its share of social problems. The estate regeneration programme commenced in 2012 to a master plan, which is generally seen as having been well drawn up. However, as implementation by the Council's development partner got under way, it ran into an increasing number of serious issues as observed anecdotally below.

Decanting the estate led to the break-up of the established community with levels of acrimony as intense as those reported in the 1960s slum clearances. Residents who had exercised their right to buy were moved out of the Estate with inadequate compensation creating much bitterness.
The well used community centre was demolished and not replaced. A new one has been built on land lower than the surrounding towers and it is north and east facing. So very gloomy. It is managed by the developer/housing association and opens at times to suit the management and at commercial rates, so much so that local groups have to travel quite far distances off the estate to find rooms they can afford.

A block of sheltered flats for the elderly was demolished along with their community rooms, with the residents housed across the large estate in different buildings and at different heights in buildings of more mixed tenure. Reportedly this has led to higher levels of social isolation. Elderly tenants could no longer "pop next door" for a chat, and as many do not have phones, they don't want to risk walking across the estate to find their friends not in.

The new taller blocks have proved ill-suited for children, with some saying they are worse than the developments of the sixties because they've less space around the

buildings. Roof top play areas are only suitable for young accompanied children. Children up to the age of about seven have to be accompanied to play outside. Children over age seven are not catered for. On-site and off-site play space is a long way away, so there is no suitable space for kicking a ball or other casual games. The old council run youth groups no longer exist, and there is nothing for older children and teens to do but hang around and get into trouble

Development of the new estate has been solely in the hands of the developer, with little involvement by the community. Supposed consultation exercises result in no notice being taken of the residents who have been uprooted or rehoused. At up to 15 storeys, the new tower blocks are taller than those they have replaced and there are more of them so result in much greater densities in the name of addressing the lack of affordable homes.

RESPONSE TO The Mayor of London Call for Evidence: Planning and tall buildings
FROM: Emma Smith, Concerned Islington Resident, Feb 2025

I write with a response to Call for Evidence: Planning and tall buildings

Under: Who can submit evidence?
You state: “This Call for Evidence is open to all who would like to respond.”
You then state you would “particularly welcome responses” from a whole host of organisations with biased views and vested interests

The people you should really be encouraging to respond are the people who live in and around tall buildings. As “regular” people they are the least likely to engage in a call for evidence, so should be actively encouraged to respond. However your statement, I believe, has completely the opposite effect

I sincerely hope you undertake serious efforts to actively gain the views of people who live in and are directly affected by tall buildings. Coupled with this, you should also assess how those views vary between tall, taller and very tall buildings. I live in a six-storey block, so meet your criteria of tall, but I imagine my experience may be different to those living in a 15 or 20+ storey block – how do you plan to evaluate this difference?

Needless to say, it is essential that these efforts actively seek views from those living in privately owned flats, rented flats and social housing in tall buildings

I would be interested to know how you plan to obtain these views please

Under: Why is the Committee exploring this topic?
You note the: "….shift in the types of homes being delivered by tall buildings towards private luxury accommodation"

As well as seeking views of these ‘luxury’ occupants, I would urge the review to consider the extent to which it is acceptable that many of these ‘luxury’ occupants are: absent ie not living in the flats, living abroad; and whether it was truly necessary to build luxury accommodation when London does not ‘need’ luxury accommodation but desperately needs affordable housing

As you state in the same section, you are concerned about “the voices of Londoners” and that “the right homes are being built for them”
This analysis must extend beyond whether luxury and social occupants ‘like’ living in the tall buildings to the fundamental nature of the type of accommodation being built in them

Under your principal questions, section 3 you mention **how tall buildings are planned and approved in London Boroughs** – I think this is a very important question and I have a few examples of the issues of tall buildings and their approval in Islington

Please note that the definition of a Tall Building in Islington is 30 metres

One. 99 City Road
Islington Council reference: P2023/1070/FUL
Status: Permission granted at planning committee meeting 11 Sept 2023
Height of the building: 151 metres
Purpose: offices

Islington Council's Tall Buildings Study and the Islington Local Plan recognise the opportunity for a taller building on this site of up to 106 metres provided it does not create unacceptable harm to views of Lowndes House from City Road

99 City Road is a Site Allocation in Islington Council's Bunhill and Clerkenwell Area Action Plan which re-states that a building of up to 106 metres may be suitable

Policy DH3 in the Local Plan states that:
Buildings over 30 metres are only acceptable in-principle on specific identified sites and that on these sites development must not exceed the maximum building heights set out in the site allocation

The Islington Council Design Review Panel still had concerns about the height and massing of the proposal and importantly, Historic England objected

And yet…… Islington Council Planning Committee approved the application just days after adopting the new Local Plan

Two. Finsbury Leisure Centre
Islington Council reference: P2024/2512/FUL
Status: awaiting date to go to the Planning Committee
Purpose: private and social homes, re-provide leisure centre, re-provide clinic

Amongst the issues relating to this application, purely in relation to the height of the proposed tower: the Islington Council Tall Buildings Study (CF-08) states that a tall building on this site would be inappropriate and yet the application is proposing a tower of 69 metres – and the applicant is ….. Islington Council.

Even when the applicant is the Council and the application, against significant local and amenity group objection, gets as far as the planning committee the clear adopted policies of the council are not being adhered to

Three. Archway Campus
Islington Council reference: P2024/2598/FUL
Status: awaiting date to go to the Planning Committee
Purpose: private and social homes, student accommodation, limited retail

There are a number of issues relating to this application but purely in relation to the height of the proposed tower:
The Islington Tall Buildings study states that the Archway Campus site is 'excluded' as a potential site for a Tall Building and yet the proposal is for a tower of student accommodation at over 80 metres. If a 30-metre-high building is unacceptable, one that is 80 metres is certainly unacceptable and yet the application has reached the stage of the planning committee

Four. New Barnsbury Estate, Copenhagen Street
Status: previous planning application approved, new application about to be submitted
Purpose: private and social homes, limited retail

This is a good example of how the heights of buildings affect the density of a site impacting many people who live on or near the site

There are currently 370 homes on the site; planning consent has already been granted (P2022/1898/FUL approved 23 Mar 2023) for 914 homes. A new planning application is about to be submitted which proposes 1,140 homes

The monumental increase in density, all buildings are over 6 storeys, as well as the very small amount of open and green space left are among the key issues in this application, but specifically in relation to the tallest buildings D1, D2 and D3 which sit alongside the Regent's Canal (which is a SINC) and the Regent's Canal West Conservation Area:

The existing two buildings currently at the southern edge of the Barnsbury site alongside the canal are at heights of 11.5 metres and 16.75 metres

Under the consented scheme, the tallest of the three towers will be approx 36 metres high – this contravenes Islington policy as this is not a location designated as suitable for a tall building; in fact the adjoining site (site allocation KC07) was assessed as inappropriate for a tall building; and yet permission was granted for the Barnsbury towers

Under the about-to-be-submitted application those three tallest towers are now proposed to be 17, 21 and 14 storeys, so approx. 53, 65 and 44 metres. The tallest tower will be nearly 4 times the height of the taller existing building and over 5 times the height of the smaller existing building

For Barnsbury any significant increase in the number of people living here will necessitate provision of amenities such as health services and schools. In reality these aspects are often overlooked, in fact no clinic is proposed here and a nearby school is due to close

Five. 48 Chiswell Street
Islington Council reference: P2023/3522/FUL
Status: planning application has been deferred twice by the planning committee due to excessive height
Purpose: offices

The site is not identified in the Islington Council Tall Buildings Study as a potential site for a tall building – it is therefore not suitable for a tall building
The existing building on the site is approx 31 metres
The current planning application is for a building 38 metres high, and up to 41 metres including rooftop plant

The current planning application has been deferred twice by the planning committee on the grounds of excessive height – because it contravenes the Local Plan – so on some occasions the Committee adheres to its policies and sometimes it does not

Six. City Basin Cluster
For several years I walked to work along part of City Road past City Road Basin where, during that time, a number of tall towers were built eg Lexicon and Canaletto

On a handful of occasions I was approaching the basin area in cloudy weather and as soon as I reached the basin raindrops started to fall and the wind blew or increased in speed, as I turned the corner into Graham Street the rain would stop and the wind would drop. I also often spoke to my mum on the phone as I walked home and on more than one occasion, when I reached the basin, she would ask if I was in the 'windy bit'. I understand that you may be sceptical but I promise you there was a difference in microclimate which I

experienced first-hand on multiple occasions at that location as a direct result of the cluster of tall buildings. With even more tall buildings across London this will happen more often

Seven. 176-178 York Way
Islington Council reference: P2024/0844/FUL
Status: planning application approved 15 July 2024
Purpose: offices

Islington Council's Local Plan identifies that part of the site could take a tall building of up to 12 storeys (37m)

The approved planning application is for ground, plus 7 storeys measuring 43 metres to the top of the plant

So….
….when considering your question of how tall buildings are planned and approved in London you must look at the Local Plan for a borough and also whether the borough is actually adhering to its own policies
Islington would be a much better place if the Local Plan was adhered to in relation to many aspects of planning but especially Tall Buildings and it would be beneficial if the Mayor could help boroughs keep to their plan

Planning Balance
The national government has restated the requirement for councils to adopt Local Plans. Islington has a new (2023) Local Plan. And yet it ignores the Local Plan and approves planning applications which are clearly in contravention

I understand the concept and use of the planning balance, however when a planning application clearly contravenes the policy the argument of balance needs to be carefully applied. It would help London Boroughs if the London Plan and Mayor supported an LPA in upholding its policies, in deferring or refusing applications or insisting changes are made before the proposals reach the committee. The Mayor is required to review and comment on a large number of applications, he could assist LPAs in resisting developers and upholding policies rather than support applications for tall buildings that contravene policy. Homes are needed but if the experience of living in them is poor this is counter-productive

Sky Belt
Just as a Green Belt was established decades ago to protect green space around towns, I believe we now have an urgent need for a Sky Belt to protect people's opportunity to see the sky from their home and the street. The sky is obliterated from view, and the skyline ruined, by tall buildings and the Mayor must act now to stop further damage

Elephant
There is an 'elephant in the room' by saying London needs 66,000 new homes a year. People want to live in London primarily because this is where the jobs are. If there was a concerted effort to place and move jobs to the outskirts, or outside, of London people will want to live in those places instead. London is undoubtedly one of the best cities in the world but some people who live here would probably prefer to live elsewhere but are tied to job opportunities. This aspect of demand for housing should also be considered

I look forward to reading the report. Thank you
Emma Smith, Islington Resident

4th March 2025

Dear Andrew and Committee members

RE Call for Evidence: Planning and tall buildings

Just Space is an informal alliance of community groups, campaigns and concerned independent organisations, aiming to improve public participation in planning, ensuring policy is fairer to communities, in a system dominated by the interests of developers. We have around 80 active members and several hundred contacts in every borough across London.

Our members have frequently expressed concerns about tall buildings and their impact on the development of London, both by driving up land prices and leading to gentirification and the blighting of sites of unbuilt permissions, and the impact of tall buildings on the immediate physical and social environment, as well as contributing to climate change through excessive carbon emissions.

This submission will use or refer to a number of studies of aspects of tall buildings which we have generated in recent years as concerns have mounted; this will be supplemented with testomonies from our members of the experience of living in and around tall buildings.

Introduction

Thank you for investigating this important topic. The Greater London metropolitan area contains the second most skyscrapers of any city in Europe. 121 buildings that are at least 100m across London, 24 in the City of London and 27 in Canary Wharf. 587 more were in the pipeline in 2024 (310 with full permission, 127 under construction) which could provide over 90,000 homes, but only 48% are located close to public transport links.

The first thing to note is that even this plethora of tall buildings, built up over decades, would amount to only a little more than one year's housing supply in the current govt's newest target of 80,000 new homes per year across London. Are tall buildings really a significant part of addressing the housing crisis?

Tall buildings became fashionable again amongst planners and decision-makers in the UK in the 1990s, with reports such as the govt commissioned 'Towards an Urban Rennaissance' 1997 by Richard Rogers (who went on to play an influential role as adviser to the first London Mayor).

In response to the emerging climate crisis and longstanding urban decay, and the need to protect London's role as a financial centre and 'World City', Rogers and others advocated high density compact cities, where the car was de-prioritised and where people lived close to employment centres and thriving high streets, where public realm and community provision was invested in, and communities thrived. A key component of this vision was an emphasis on tall buildings, clustered at transport nodes, accommodating both employment and housing.

Although some elements of this vision remain, they have been diluted by a housing crisis which has relentlessly worsened since 1997, and, has become a top priority under the current government. Tall buildings are now seen as essential to achieve housing targets, recently increased for London by 63% from 52,000 homes per year in the current London Plan to the government's overall target of 80,000. The target is fundamentally unrealistic: the recent Housing Delivery Test showed that, over three years 2020-23, an annual average of only 39,395 homes were built in London.

In fact London suffers from a *housing affordability* crisis. London needs more housing affordable to rent (privately or publicly) or to buy, and a higher proportion of these need to 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. In fact the empirical evidence points the other way: London's housing stock increased by around 25% between 2000 and 2024[1], a greater amount than its population (which grew about 22.7%[2]): but house prices on average rose by 241% over that period[3].

How can this be? The remorseless rise of property prices in London, coupled with a financial governance regime which has enabled London to act as a laundromat for much of the world's hot money, the city has been a global magnet for both legitimate and ill-gotten money to be invested in property. Investors parking their money here want the most fungible product: in being an internationally recognised interchangeable trophy product, high-rise property fits that bill best.

A crude view might be that tall buildings may be a significant help in responding to government pressure and meeting its unrealistic targets. This would be wholly wrong. Residential tall buildings are part of the problem, not the solution. They 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.

An expose in The Guardian in 2016 revealed that of the 220 flats in the UK's tallest residential block - the Vauxhall Tower - only 12 were lived in, and most were owned by assorted oligarchs, kleptomaniacs and former dictators. However, this didn't stop the product - swanky flats in trophy tall buildings - from being encouraged and approved by the GLA and local authorities.

In fact investment in major development including tall buildings encouraged by the Mayor is even predicated on unaffordable rental uplifts way beyond inflation. The 2024 brochure for Opportunity London - an attempt led by the Mayor to get major investment into major development schemes - gushed opposite a CGI of a tall building in Thames Road, Barking, that

[1] by 747,640 from around 3,000,000 homes in 2000 Live tables on housing supply: net additional dwellings - GOV.UK Table 118

[2] from 7,172,057 in 2001 to 8,799,827 in 2021

[3] UK House Prices Graph & Data (From 1952 - 2024)

"the scale of opportunity is significant —forecast housing and rental price growth over the next 5 years in the borough are 22% and 16% respectively, above the London average."[4]

Rather than a plan for much-needed housing affordable for purchase or rent, the need for private finance to develop that housing - which would theoretically include a limited element of genuinely affordable housing - is predicated on developing even more unaffordable market housing of the cookie-cutter tall building typology. This is the tail wagging the dog.

As a result tall buildings are coming to be seen by communities as harbingers of gentrification, rising rents and land prices, and displacement.

1. Who lives in tall buildings in London and what are their experience of doing so? In particular:

In central and inner London most new tall buildings are the most valuable part of a wider development, and so as many as possible are retained for market sales. It is rare for developments to mix affordable or social homes with market homes; it is therefore rare for tall buildings to contain the required element of affordable/social housing: instead this is provided in an outhouse, often of a different architectural quality (as at the Vauxhall tower or 100 Westminster Bridge Rd, for example) or off-site entirely (such as at 1 Blackfriars, where money-in-lieu funded development of social housing in the New Kent Rd). The latter in particular can positively reinforce social exclusion.

a. How do those experiences differ amongst different groups, including students, families, older people, and disabled people?

b. What are the key benefits and challenges experienced by residents living in tall buildings?

There is much specific evidence from individuals and member groups around London as to the difficulties of living in tall buildings of social housing - from security concerns, broken lifts and disrepair to isolation. There is also evidence that tall buildings of social housing can have attractions.

The GLC-built 1970s Ethelred Estate in Kennington included 4 towers up to 22 floors, plus a series of 4-6 storey blocks, retail, a school and significant open space. One of the towers was demolished following a boiler explosion wrecked the building, and the other three were in such a poor state by the 1998 that the 300 households in the towers led the Ethelred TMO to accept working up a PPP with Berkeley Homes brokered by Lambeth Council. They were told that the tower block residents wanted traditional streets of houses with gardens. However, when at an early stage in the consultation Berkeley Homes invested in repairing the lifts and installing conceirges in each block, residents changed their minds, and a majority voted against the proposed Project Vauxhall in 2000, preferring to remain in the towers. A fourth tower of social housing was constructed in 2016 as off-site provision from the redevelopment of the Shell Centre in Waterloo. So long as the concierge and lifts remain succesful, residents of all four towers continue to support retention of the towers.

c. Do tall buildings impact residents' mental and physical well-being compared to other types of housing types?

They can - see the comments about the impact of daylight and sunlight on existing residents, below

[4] Opportunity London 2024 brochure attached; pg 32-3

2. How do tall buildings contribute to or detract from the creation of inclusive and thriving communities in London? In particular:

a. How do local communities perceive tall buildings in their areas?

The experience and perception of tall buildings depends upon the context. In parts of central London which have had decades of tall buildings the experience is very different from those areas destined for major change through designation as an Opportunity Area with a cluster of tall buildings, or suburban areas not so designated but with tall buildings coming forward.

Wherever tall buildings are located, they can have significant environmental impacts:

Daylight/ sunlight - clusters of tall buildings can have a devastating impact on daylight and sunlight of existing adjacent homes; single or slender tall buildings can have a far less devastating impact. Although daylight and sunlight are theoretically protected as part of residential amenity in national, regional and local policy, this protection is too readily and frequently circumvented or ignored. The BRE has provided a methodology and guidance on how to assess the impact of development on existing homes; but this guidance is systematically misrepresented in the assessment undertaken by the small group of practises which dominate the development industry. It is constantly claimed that the BRE guidance is devised for suburban or rural areas: it is not.[5] The plain fact is that all human beings require access to daylight for physical and mental health, whether living in the Green Belt or the centre of a centre; and a room will appear bright or gloomy depending upon the amount of direct sunlight and daylight which can enter its windows, whether in an open field or a city centre (and there are flexibilities in the BRE guidance when it comes to historic centres or in the middle of a cluster of tall buildings). Wherever a development is approved despite negative daylight impacts, these practitioners endlessly hold up this example as justifying other purportedly similar developments. But as the Secretary of State's Inspector advised on the called-in application for 8 Albert Embankment noted - having listened to purported comparisons of the impact of two 'standalone' tall buildings to the daylight achieved in Mayfair, or in the centre of a cluster of tall buildings

> *"In my view, there is a danger in placing too much reliance on such comparisons. Although it is close to the heart of London, some of the affected accommodation around the appeal site houses families with vulnerabilities, who have little choice about where they live. Evidence that links daylight levels with human health, including mental health and disease resistance was referred to by Lambeth Village, and is more than anecdotal. Material reductions in daylight should not be set aside lightly.*" [757]

This application for two towers of 443 homes was refused by the Secretary of State on two grounds (impact on daylight and on views of the Westminster World Heritage Site), but the developer's daylight practitioners arguments had been already accepted by the local authority and the Deputy Mayor (and the application supported) before being called in. It is to be noted that in this instance the tall buildings weren't slender and effectively amounted to a wall of development, because the design team had clearly not taken the impact on daylight seriously. It is often possible to minimise daylight harm through clever design, but few bother. The impact on residents can be devastating (particularly those in social housing, who do not choose where they live) with one witness at the 8

[5]BRE 'Site Layout Planning for Daylight & Sunlight: a Guide to Good Practice' 2022 http://www.brebookshop.com/details.jsp?id=326792

Albert Embankment inquiry describing how he had suffered from Seasonal Affective Disorder (SAD) as a result of the development of an adjacent tall building, and had had to leave his ground floor council flat.[6]

Overshadowing of open space is another problem of badly designed tall buildings. The BRE guidance on this does not provide effective protection: if 50% of the open space receives at least 2 hours of sunlight it is considered acceptable. It is of no comfort to children in their playground permanently in the shade that some other part of the park gets two hours daylight. Nevertheless, the issue of overshadowing for tall buildings is usually transient, whereas slab buildings can cast a shadow throughout the day.

Microclimate - residents living close to tall buildings can experience the devastating impact of wind speeds on the streets around them, as can be witnessed on a windy day in the vicinity of the Walkie Talkie. Wind speeds increase the higher a building goes, with flat surfaces reflecting the wind; a large portion of that hitting a higher building face travels downwards at higher speeds, causing turbulence with the prevailing wind at ground. Tall buildings with curved surfaces are less problematic (the Gherkin is a good example where wind is deflected and dispersed when hitting the building), but there are very few tall buildings which do not require mitigation measures to limit the impact at ground. These problems get considerably worse at clusters of tall buildings. Older people in particular are vulnerable to being buffeted or knocked off their feet by turbulence generated by tall buildings (my mother was blown over in Waterloo Rd, which is a wind tunnel). The BRE 'Wind Microclimate around Buildings' explains general principles of wind flow patterns around buildings to assist designers, planners and developers in developing massing and layout techniques to mitigate unacceptable wind speeds. The BRE Digest also gives advice on methods and criteria for assessing pedestrian wind comfort, based on Lawson's comfort criteria (developed through studies of the impact of the Shell tower on the South Bank).

Sterilisation of the immediate area - the immediate area around any building is unconsciously contested: the higher or more monumental the building, the more uncomfortable it is to pass close by - which is why a terrace of 2 storeys buildings can face directly onto a street (e.g. Roupell St SE1), but a domestic Victorian or Georgian 3-6 storey building needs to be set back, and (except office buildings in the City) tall buildings are surrounded by space. The taller the building the more it requires space around to avoid overbearing. A simple example is the Gherkin, which has a large sterilised area of nothing around the building. Such space separating a tall building from adjacent buildings is required to ensure appropriate levels of daylight within the flats of residential tall buildings (this latter doesn't apply to office buildings, which is why clusters of office buildings in the City can work). An example of a residential building is the Strata tower, the first of several developed at the Elephant & Castle. It sits as an island in a surrounding sea of sterilised tarmac. Passersby cross the road to avoid its emptiness. The same applies to the series of non-clustered tall buildings, appearing as a broken circle of teeth, each tall building an island of exclusion.

Exclusion - tall buildings are explicitely gated developments by definition, unless, in exceptional circumstances, they provide public amenity at the ground (e.g. the public leisure centre at the foot of 50 South Lambeth Rd, in the VNEB cluster). They do not foster engagement with the local community; nor does their exclusivity enable a tall building's residents from coming together as a

[6] At 752 of the Inspector's Report: Called-in decision: 8 Albert Embankment, London Borough of Lambeth (ref: 3254203 - 23 June 2021) - GOV.UK

community - indeed few tall buildings provide spaces large enough for meetings of potential resident groups from within the building. Tall buildings are inherently hierarchical, with expense and exclusivity increasing up the building. Clusters of tall buildings can be equally exclusionary.

For those communities where tall buildings are proposed for an area which has never had tall buildings (an increasing group, as newer areas in suburban and outer London are targetted), residents often consider the proposals a threat, harbingers of gentrification, rising rents and land values, and community displacement. For example, local resident campaigns have sprung up against residential tall buildings of 18 storeys proposed to displace current large retail store sites in Penge (Bromley)[7] and at Streatham Vale (Lambeth) which are currently both of a suburban density in 2-3 storey buildings, with no existing tall buildings. The proposed buildings are of a density, height and typology completely unheard of in the neighbourhood. The developments would dominate the roads and streets around, and would be visible from considerable distances, including across locally protected views. These are also neighbourhoods where public transport is limited and the car still considered necessary, and so there is widespread scepticism that the tall buildings will be genuinely car free, rather than simply car-park free, with parking stress on nearby streets likely to be generated (in the examples above, neither of these areas have CPZs, which are necessary to enforce car-free development). The ferocity of the local community's response to what appear to be alien forms imposed and sanctioned by the local authorities and by the Mayor (who waved them through) undermines community relations and the legitimacy of decision-makers, the planning process and political representativeness.

b. Are there examples of good tall buildings in London? What features make them successful?

Some of the most well-known tall buildings, such as the Gherkin, the Shard, and Senate House, which are appreciated for their shape/design, but these are rare examples and are always designed as non-residential development. There is no equivalent of residential tall buildings, except, perhaps, converted office blocks such as Centre Point. This contrasts starkly with the fact that many large mid-rise mansion block developments are viewed positively, such as Du Cane Court in Balham (Wandsworth), Florin Court (City of London), Driscoll House in the New Kent Rd (Southwark), and even the massively dense 1,250 flats of Dolphin Square in Pimlico (Westminster), which includes shops and a swimming pool. Mansion blocks are a well-recognised residential form which signify living within an open community rather than a closed hierarchy.

The development of three additional residential towers at the Shell Centre (Lambeth) could be a rare example of a cluster of tall buildings in the way Richard Rogers originally envisaged. The Shell Centre was the biggest office development in Europe when it opened in 1962; nevertheless, redevelopment from 2016 added 800 flats and 50,000m2 of office to the site, which is completely car free, being adjacent to the UK's largest station. The area is very dense, and the development as a whole is largely obscured from the hinterland (it is only visible in its entirity from the riverside and from strategic views from three bridges across the Thames). However, the public spaces between the buildings fail to operate as gardens and playspace for the residents, as was the intention, or even as pleasant bits of public realm. Although this is forgiveable, since the development is adjacent to a high quality park (Jubilee Gardens) with children's playground (and the development is also funding an extension of the Gardens across the Hungerford Car Park), it is not something which can be

[7] LBB 23/00178/FULL

replicated without similar circumstances (high density area, massive transport node on one side, significant park on the other).

By contrast, the dense cluster of tall buildings at the VNEB remains unwelcoming and a blight on existing residents on the borders of the Opportunity Area. As with most of the original OAs this was supposed to regenerate a declining industrial area by providing 25,000 homes and 25,000 jobs. The high-density high-rise development was posited around the creation of a Linear Park connecting all of the developments to the transport node at Vauxhall. The size of the Park was radically cut in half in the move from draft to adopted OA Planning Framework. The Linear Park has not emerged, just a collection of unjoined green spaces at the back of each development, with little apparent overall design.

Elephant Park, in contrast, is a relatively successful singular open space (with some saved mature trees which pre-date the development) in these narrow terms, surrounded by a mix of tall buildings and mid-rise development. However, the entire development remains blighted by the manner with which it was brought about: the land was stolen from an entire community of 2,000 working class households, who were evicted and scattered to the winds, and a major shopping centre and market which served the relatively impoverished community and Latin American community was eviscerated and erased - all with the connivance of successive regimes at Southwark Council and at City Hall.

Despite the plethora of tall buildings in places as diverse as Ealing, Wembley, Stratford, Woolwich, Lewisham and White City, they remain uniformly disliked by our members as symbols of exclusion and by the general public as at best necessary evils.

c. Are tall buildings helping to meet London's housing need?

No. As set out in the introduction, London needs housing affordable to purchase or rent. 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.[8] A study by Just Space has revealed that the number of vacant properties have been increasing across London since 2016: for example, Lambeth council's official count of empty homes doubled from 1700 in 2017 to 3400 in 2022. It is estimated that property to the tune of £20bn remains empty across London.[9] It is extraordinary that the GLA has not published any significant research into how widespread this problem is, given that it is perceived by the general public as part of the scandal of the housing crisis. This contributes greatly to the sense of illegitimacy and to the ubiquitous opposition to tall buildings proposals, which herald a gentrification benefitting investors, contrary to the needs of residents.

Financialisation of housing is becoming an increasing problem in many cities across the world.

> *"Two related factors are seen to generate financialization pressures: the increased supply of investable funds worldwide and increasing demand for housing. The growing global pool of capital is attracted by housing, which is seen as a safe investment, but also a profitable one. Many large investors assumed that more professional management and scale effects would*

[8] Action on Empty Homes

[9] Mayor of London and Westminster City Council call for stronger powers to crack down on long-term empty properties in London | London City Hall

increase yields. The funds come from at least four sources: the expanding amount of savings held by institutional investors looking for investments across the globe; large trade surpluses amassed by emerging economies, including the many petroleum-producing countries with sovereign wealth funds; the rise in demand for high-quality collateral as a result of monetary policies such as quantitative easing; and the accumulated profits held by transnational companies in tax havens. Demand for housing has been pushed up by this influx of funding, but also by the retrenchment of the welfare state and the emergence of asset-based welfare which, together with government programmes to increase homeownership, have strengthened the demand for mortgages. Housing became an increasingly important investment asset and store of value for banks and high net-worth individuals in the ultra-low interest rate environment that prevailed until recently".[10]

Tall buildings proposals are also working against the urgency required to tackle the crisis. Being inevitably controversial and inherently a challenge to planning policy, tall buildings proposals require longer in pre-app and at the decision-making stage. They encourage speculative proposals, since their height is only limited by constraints enforced by the planners and decision-makers. Requiring high quality of design and testing of many aspects, they generate greater costs at application stage. Their construction cannot be phased, and so their implementation is inherently more risky. All of these factors mean result in tall buildings permissions taking years to achieve and years to implement, on sites which often lie vacant in the meantime. There are many examples of residential or mixed use towers taking inordinate time to be developed, including

- *The Shard: proposed in 1998 but not completed until 2013, 15 years later*
- *The Vauxhall Tower: site purchased in 1997 and pre-app'd from 1999, but not completed until 2014, 15 years later*
- *Doon St tower and leisure centre: pre-app'd from 2003, permitted in 2008, but remains unbuilt, its site vacant for over 20 years*
- *18 Blackfrairs (Southwark) lay vacant from 2003, pre-app'd from 2004, permitted 2009, 2017, 2023, yet still vacant 22 years later*
- *Elizabeth House (Waterloo) permissions granted for tall buildings 1996, 2013, 2021, none built, the site blighted for 29 years*

The process inevitably invites speculative proposals, with the aim to increase book value and flip the site. This can blight sites for decades. In short, tall buildings bring blight followed by gentrification, rising land values and the destruction of existing communities. None of this helps to meet London's housing need, and in all likelihood exacerbates the housing crisis.

Finally, tall buildings rarely deliver the social benefits - in terms of affordable housing or other community benefits - which they promise. See the attached presentation from BSP students for Just Space from 2024.

d. Are there any particular tenures where tall buildings have been most or least successful?

e. What are the environmental and energy impacts of tall buildings compared to other typologies?

[10] 'Financialisation in 13 Cities' LSE 2023, pg 23

Up to 40% of carbon emissions in London result from construction. Greater London consumes 3.3million cubic metres of concrete annually.The carbon footprint from concrete alone in London is 2m tonnes.The carbon footprint of just the concrete used in construction is equivalent to over 30% of all the transport emissions across London. Tall buildings rely more heavily on concrete in construction than traditional housing typologies, and are inordinately carbon heavy, requiring considerably more concrete per sq ft than lower more conventional buildings. There are alternatives, particularly CLT, which are perfect for lower buildings up to mansion block size, and are also more efficient. An example of an alternative to tall buildings is included in the presentation attached from a member who is also an architect. He produced a proposal for 145 homes on a site in Lambeth Walk which involved refurbishing existing buildings and extending them up to 6 storeys using CLT; this was an alternative to a council proposal to demolish the existing housing and construct a 14-storey tower using concrete. The council's tall building scheme would generate 6,000 tonnes of carbon; the lower alternative would sequester 8,000 tonnes of carbon. (Sadly, the council refused to consider alternatives and approved their own scheme, and the Deputy Mayor concurred.)

Tall buildings are disproportionally carbon intensive to construct; they are also disproportionately carbon intensive to maintain. Environmental conditions are more extreme at higher altitudes, for example colder in winter, more exposed to solar gain in summer, and more exposed to high winds at any time. Considerable evidence has been amassed by Professor Philip Steadman at UCL which demonstrates that the amount of carbon required to power and maintain a comfortable environment in a tall building becomes increasingly larger the higher a building goes above 6 storeys. Dr Steadman is one of the founders of the Building Stock Laboratory in the UCL Energy Institute, which works on modelling energy use in the building stock of Britain, and associated emissions. The Lab has developed the London Building Stock Model and the London Solar Opportunity Map for the Greater London Authority. The Lab is working presently on the National Buildings Database for the Department for Energy Security and Net Zero, which will cover all buildings in England, Wales and Scotland, and will be a major instrument for national policy-making on energy in buildings.

A key strategy in the London Plan for reducing carbon emissions is the circular economy and the requirement for Whole Life-Cycle Carbon Assessments. However, this is not working, as the following example demonstrates, re the approved proposals for 72 Upper Ground[11] on the South Bank. The demolition of an existing tall building and the construction of two tall buildings (110m and 60m) joined by a 6 storey podium (including the excavation of a triple height basement to accommodate cycle spaces for 4,000 workers) would generate 103,000 tonnes of carbon. This is more than would be generated by the 4,000 workers driving to and from work from Surrey for 20 years! This application - again, supported by the Deputy Mayor - makes a mockery of London Plan policy which seeks to guide development but does not require adherence.

Tall buildings are inherently difficult and expensive to refurbish or repurpose. Being one vertical building does not lend itself to phasing or partial refurbishment, and this can financially cost as much as demolition and rebuilding, as the recent consideration of Citibank for the future of their 30-year old HQ at Canary Wharf.[12]

3. What improvements or changes should be made to the way tall buildings are planned and approved in London? In particular:

[11] APP/N5660/V/22/3306162

[12] FT 16/01/25 Citigroup racks up £1bn bill for Canary Wharf tower refit

a. How are the wider impacts of tall buildings considered by Boroughs when granting planning permission?

The general perception of our members active across most London boroughs is that there is a presumption in favour of tall buildings (apart from rare exceptions such as Westminster Council until fairly recently). Clearly there might be tall building proposals which are knocked back at pre-app and communities don't hear of them, but equally clearly boroughs take tall building proposals as serious investment opportunities which may well attract more investment, and encourage tall buildings in their Opportunity Areas and town centres, even when they involve locations not identified as suitable for tall buildings. As a result the scales are tipped such that wherever heritage harm or harm to amenity is identified, the harm is outweighed by the purported benefits of tall buildings. Only once in 25 years have I witnessed officers recommending refusal for a tall building (the Vauxhall Tower in 2003).

It is also rare for local authorities to protect areas outside Opportunity Areas from the impact of tall buildings, although this can be effective, as demonstrated recently at Vauxhall. The area outside the VNEB OA is protected by the Vauxhall Conservation Area, which states clearly that this is designed to help focus redevelopment pressures on the Opportunity Area. This position has recently been upheld by an Inspector on an Appeal where a landowner admitted to seeking to take advantage of the proximity to the tall building cluster in the VNEB.[13]

b. How are the wider impacts of tall buildings considered by the Mayor of London when granting planning permission?

Policy

As set in the Introduction above, Rogers' original idea was for clusters of tall buildings in OAs. But the first London Plan was far too permissive, allowing developers to take a punt on proposing tall buildings in many other locations, and many were approved. Subsequent efforts by Mayors Johnson and Khan have sought to row back on this: London Plan policy D9 now requires boroughs to identify locations for tall buildings through their local plan process: "tall buildings should only be developed in locations that are identified as suitable in Development Plans." However, the policy is not adhered to, with the Deputy Mayor approving dozens of tall buildings not in locations identified as suitable, such as the aforementioned 72 Upper Ground.

The London Plan also fails to provide a strategic lead by encouraging the boroughs to set their own definition of a tall building. Lambeth now defines tall buildings as above 45m north of the South Circular, including right up to the riverfront (where tall buildings have traditionally been defined as starting at 25m). The result has been a series of building proposals up to 45m which have significant impacts on residential amenity and views, but are not required to present the requisite information to enable rigorous testing. This is particularly problematic at locations where boroughs meet, including the entire length of the river, but might have quite different definitions of tall buildings and their acceptability.

The result of successive London Plan tall building policy has been a disaster for many areas, which have seen the sweeping away of poorer communities and the imposition of an alien typology. There have been unintended consequence: for example, the row of 1950's office blocks provided cheap

[13] APP/N5660/W/24/3345872

Grade C accommodation to thousands of SMEs and charities who benefitted from being close to Westminster, but these were all demolished and replaced by a row of uber tall residential buildings which have no affordable housing (or workspace), are very highly priced and are largely empty.

The only consistently effective constraint on tall buildings has been the LVMF, but this is out of date and requires a serious upgrade (with early consultation). It is heavily focused on central London, the river, the two central WHS and St Pauls - but the entire riverfront from Barking to Teddington has been up for grabs and much east and west of central London has already been hemmed in by tall buildings.

And even the LVMF is too frequently paid lip service, such that so many tall buildings are approved to pop up in the Westminster WHS that UNESCO has threatened action (which would ultimately mean de-designation, as happened at Liverpool).

c. How should the new London Plan (and local development plans) accommodate tall buildings as part of a mix of housing typologies?

The new London Plan should acknowledge that tall buildings are only one way to build dense housing and that there are better alternatives which are less risky, less negatively impactful, and produce better community outcomes. Maida Vale has no tall buildings and many mansion blocks, and is the densest square kilometer of London (20,000 ppl/sq km). London is far less dense than Paris (inside the periferique) which achieves this with very few tall buildings. Density is key, and the London Plan needs to re-introduce the London Plan Density Matrix policy (which was repealed in 2021) and needs to set minimum and maximum dwellings/ha based on transit access.

However, the biggest problem that London's housing market faces is the growing amounts of savings and investment (including investments from abroad) which flow in to the ownership and development of land and buildings including especially our housing stock, pushing up the market values of what have become financial assets rather than homes to live in. Even popular TV series about houses constantly assume that we are all trying to accumulate family capital by our DIY.

London is a very extreme agglomeration of business, cultural, educational and government activity. The growth of this activity has been a main aim of London planning since at least 2000, sucking in migrants from other regions and abroad and securing massive public investment in transport and other infratsructure to enable it. This all further inflates land values and house prices. It fuels regional and class inequalities. This needs to be stopped.

The scale of demolition and replacement of the built environment is unsustainable in carbon and material impacts and often socially damaging.

Since wages for much of the population are low and have fallen in real terms, massive subsidies to landlords have been needed so people can pay their rents. Even with that, many can't, and evictions and homelessness mount. Coping (even badly) with homelessness has become a major factor in driving borough councils towards bankruptcy and many homeless families are forced in to temporary acommodation, often far from home and sometimes in other regions.

The escalation of land, housing and property values should make London a well-resourced city but most of the growth is gathered as private wealth of owner-occupiers and corporations: the tax base is relatively static and we have no adequate way to capture this value to run public services, pay for infrastructure or council housing, the need for which escalates while the stock shrinks.

Successive Plans have tried to maximise housing production and this imperative distorts the Plan: owners are incentivised to switch shops, offices, industries, community spaces, open space and almost every other use of land into speculative housing. Many of the constraints on this process have been relaxed either by central government (use classes, permitted development) or the GLA (density and tall buildings policy).

The process of making and implementing public plans is dominated by real estate and business interests with citizens having minimal influence and often being treated with contempt or disregard by officials and councillors, especially in the "Opportunity Areas" where tall buildings are most concentrated.

We would be happy for members to present these points to your committee and answer questions on this very important issue.

All the best

Michael Ball
Just Space
xxxxxxxxxx
https://justspace.org.uk

Embodied Carbon in Construction: 40% of UK co2 emissions come from construction.

Why is the Mayor's Whole Life Carbon Assessment in Planning Applications so important?
From evidence of submitted and accepted WLCA's in Greater London planning applications so far, it is abundantly clear that the overwhelming proportion of CO2 emissions occur in the construction of the structural frame of new buildings. These are reinforced concrete frames and substructures.
Greater London consumes 3.3million cubic metres of concrete annually.

CONSEQUENTLY, THE CARBON FOOTPRINT OF CONCRETE ALONE IN LONDON IS
2 MILLION TONNES OF CARBON FROM JUST ONE CONSTRUCTION MATERIAL.
Worldwide every year cement and concrete production generates as much as 9 percent of all human CO2 emissions.

By Comparison, **London Emissions from ALL Road Transport, Rail, Shipping & Aviation is 6.4 Million tonnes** (GLA Pathways to Net Zero Carbon by 2030) This is dropping rapidly due to policies limiting the use of fossil fuel based transport (eg: London Taxi electrifcation, ULEZ, etc..)

THE CARBON FOOTPRINT OF JUST THE CONCRETE USED IN CONSTRUCTION IS EQUIVALENT TO OVER 30% OF ALL TRANSPORT EMISSIONS ACROSS LONDON, AND IS RISING PROPORTIONALLY, AS CONSTRUCTION IN LONDON HAS CLEARLY EXPANDED RAPIDLY AND IS STILL GROWING.

London's Health consequences - CONSTRUCTION TRANSPORT POLLUTION:

Diesel-powered vehicles, vessels, locomotives, and equipment account for over 60 percent of all nitrogen oxides (NOx) and more than 70 percent of all fine particulate matter

London consumed 3.3 cubic metres of concrete annually. (above)
equivalent to **550,000 concrete truck journeys per annum**.
or 2,034 journeys per day

Trucks are commonly 3.14 miles per gallon,
Every day concrete trucks burn approx. 4,064 gallons of diesel within London.

This is the equivalent 15,000 Tonnes of Co2 every year.

Particle Pollution:
Construction lorries have between 12 -16 wheels -
"**52% of all the small particle pollution from road transport came from tyre and brake wear in 2021,**
plus a further 24% from abrasion of roads and their paint markings.
Just 15% of the emissions came from the exhausts of cars and a further 10% from the exhausts of vans and HGVs. "*
*Tyre wear particles are toxic for us and the environment, Imperial College report 2023

Lorries, vans and specialist heavy vehicles (all over 3.5 tonnes), and buses, minibuses and coaches (all over 5 tonnes) DO NOT NEED TO PAY THE DAILY ULEZ CHARGE. TFL website

Alternatives:
As in the energy industry, there is no single solution, but a series of alternatives to the carbon footprint of construction. Given that the climate emergency is here now, these have to be advanced rapidly.

A. Retroft First: This is already embodied into the London Plan. It is however, just like embodied carbon being generally disregarded in favour of demolition and new build due to the systematized and entrenched development routine within the industry. This is in many ways similar to the resistance of the ULEZ scheme, except that a powerful and well funded industry can lobby on this. Again, fimsy viability studies on retention are being accepted with little checking or challenging from Planning departments.
In the light of the high courts decsion to overturn Michale Gove's refusal of the M&S Oxford Scheme on embodied carbon issues - the law on retrofit URGENTLY needs to change!

B. Low carbon construction alternatives: For almost 20 years it has been possible to construct buildings in structural timber up to and beyond 10 storeys high. This contemporary technology using Cross Laminated Timber (CLT) is being used increasing commonly across Europe. The UK has already hundreds of new buildings using this. However, in London its use is still resisted despite its huge potential to drastically reduce the carbon footprint in London. Paris and Amsterdam have already introduced policy requirements to make new buildings using this as a preference rather than as an exception. Timber sequesters Carbon - it stores CO2 – it is the only current viable method of carbon capture and storage. As an alternative to materials like concrete and steel, it is a solution rather than a problem.

C. Good design: By commissioning good and appropriate advice from those who are experienced in low carbon design and construction: By selecting designers who have true and honest knowledge of sustainable design, each project would be analysed according to the potential of the individual brief and context. Filtering out those who see sustainability as 'a good fee earner' is absolutely essential. Unfortunately almost all designers consider themselves as 'sustainable', just as any business has to present themselves so. Even the oil industry makes similar unsubstantiated claims, the construction industry is no different.

D.Whole Life Carbon Regulations : These have to be rigorously checked. There is no useful purpose in having policies unless they are both verifable or enforceable. At present this is not the case, and the longer this is not addressed, the more entrenched the abuse becomes, and soon it will becomes normalised. All the professional bodies including the RICS and RIBA have endorsed the principle of addressing embodied energy as fundamentally essential if we are to reduce carbon in construction. The profession needs to be 'on the right side of the fence' in this approach. If this is not rigorously checked the current best chance of addressing the problem will evaporate.

This list is by no means complete, and many other solutions are out there. The bigger perspective view of how to address embodied carbon in constructing a future London requires a signifcant amount of analysis and action. However, the facts are abundantly clear to act on now, and as so many have for so many years declared a climate emergency - this needs to be acknowledged as an emergency and not an endless discussion with no effective action.

INCENTIVES FOR TRUE LOW AND ZERO CARBON CARBON DEVELOPMENTS:
net zero is a bold gesture, but the term 'net' has been misplaced as it can often be 'better' but not a realistic long term solution.

A. The Mayor could incentivise low carbon construction, especially in medium scale developments under 10 storeys. This would reduce the impact of CO2 emissions signifcantly across London. The technology is already being used. The construction industry is, however, very resistant to changing established habits. Despite this many in the industry would openly say that if they were required to be more sustainable they would gladly do it. The established oommissioning, development, funding and insurance institutions could easily adapt if required to under clear policies and guidance for City Hall.

B. A COMMON MATERIAL BASELINEIN WLCA ASSESSMENTS:
WLCA methodology needs both updating and rigorous checking. Currently timber is calculated as being close to zero carbon, where it should be considered as sequestered material. Timber structures are assumed to be burnt at end of life, whereas all other construction materials are credited for 'recycling'.
Concrete, for example, is credited for carbonation process where the material reabsorbs CO 2 during its lifetime. This process is extremely slow and requires very specifc conditions to work. One critical condition is to expose it to the air to allow it happen. The vast majority of concrete structures are sealed in airtight constructions which severely limit this process and even in ideal conditions and at 100 years of exposed carbonation, only about 25% of the emitted carbon can be recarbonated.
Steel also is credited as it can be 'recycled', yet recycled steel requires it to be processed and reheated in furnaces to 3,000 degrees which requires a huge amount of energy.
These misplaced assumptions badly distort the entire WLCA calculations to give credit where credit is not applicable.
A more accurate baseline for materials is clearly needed for all WLCA's to be calculated from a single and realistic baseline criteria. This is very easily solved and would reveal the true impact of construction in any development from a common foundation.
At present it is a 'free for all' and easily distorted to make obviously unsustainable buildings appear to be sustainable. The obscene levels of greenwashing in the industry must be called out.

C.RE-ASSESS THE CURRENT DISTORTED FIRE REQUIREMENTS FOR CONSTRUCTION:
There are many uninformed and **unnecessarily prohibitive restrictions on the use of structural timber in construction in the UK.** This is not the case in Europe , Canada, the US or Australia.
This is partly due to misconceptions in the light of the Grenfell disaster here in London. Grenfell did not burn due to any timber in the construction, it was overwhelmingly due to its use of flammable cladding.
Modern Solid timber construction methods such as CLT have been used throughout Europe without any incidents of fire. It is a rigorously tested technology which is highly predictable in how it responds to fire. It is more predictable than steel, and has a long history of reliability, simply due to the fact that the issue of fre is rigorously designed into every aspect of construction form the production and construction processes through to on site checking.


contemporary & future timber architecture
1 Bowling Green Street, Kennington, SE11 , KMK Architects 2012

Denby Court ***Alternative Scheme 2022***
©KMK Architects *85 Lambeth Walk SE11 6DX*

Newport Street Gallery

China Walk Estate

China Walk Estate

Walnut Tree Walk

Lambeth Walk

Sapperton Gardens

Denby Court

Fitzalan Street

Doorstep Green

Lollard Street

Ethelred Estate

Lambeth Walk

Adventure Playground

Aerial View

Denby Court 22nd August 2021

DENBY COURT: ALTERNATIVE LOW-RISE TO ACHIEVE 141 LAMBETH HOMES

Homes For Lambeth's application view of the proposals from Lambeth open space park.
Save Lambeth Walk's alternative profile shown in outline as a comparison.

Lambeth Council's Homes for Lambeth (HfL) propose to demolish Denby Court: 42 low-rise sheltered homes and an Adult Day Centre on Lambeth Walk.
These would be replaced by the development of 141 flats: 78 private, 22 'affordable' and just 41 new council homes – a net loss of council homes on a site owned by Lambeth

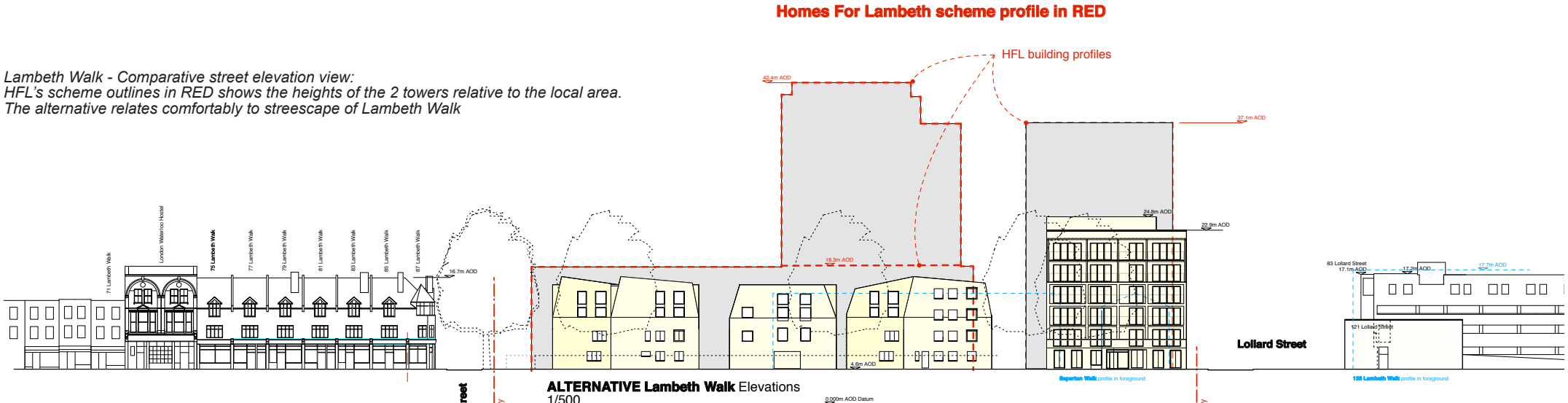
The development includes 2 private towers of 10 & 12 storeys which would be entirely out of context, would dominate and overshadow dozens of homes and the only green amenity space in the area. Contrary to the requirements in planning policy and found in good practise, minimal consultation was attempted during lockdown, and the local community has been ignored.

The alternative provides exactly the same number of 141 homes as the HfL scheme, with the same mix of size of homes
The alternative meets all the required space standards, amenity provision, and other standards
The alternative involves retro-fitting existing homes and adding additional floors, plus a new 6-storey block along the southern edge of the siteand would use sustainable materials, included fire-resistant laminated wood, and sustainable construction techniques. As a result of using less materials floor-to-floor heights are significantly reduced.

All of the existing 27 mature trees on the site would be retained, including maple, cherry, apple & walnut trees. All of the existing green courtyards would be retained and improved

The alternative is financially viable and capable of generating a profit for further homes, as the business model of Homes for Lambeth

Lambeth Walk - Comparative street elevation view:
HFL's scheme outlines in RED shows the heights of the 2 towers relative to the local area.
The alternative relates comfortably to streescape of Lambeth Walk



The Alternative Design shown in context

THE ALTERNATIVE DESIGN HAS EIGHT SIGNIFICANT BENEFITS:

1. At up to 6 storeys, and re-using the existing arrangement of buildings, the alternative would be **entirely in context with the townscape** of the neighbouring area.

2. Being less than **HALF THE HEIGHT**, the alternative scheme vastly reduces the impact of overshadowing and overlooking the many neighbours and the Lambeth Walk Green.

3. The impact on daylight and sunlight of neighbouring homes will be negligible. This is a huge improvement on the current application, where **over 100 NEIGHBOURING WINDOWS WOULD FAIL THE BRE GUIDELINES, REDUCING DAYLIGHT IN HOMES BY UP TO 50% OR MORE.**

4. The alternative will not impact on the sunlight enjoyed at Lambeth Walk Green and in various housing amenity spaces and private gardens. The current application would cast long shadows across Lambeth Walk Green for much of the afternoon and obliterate direct sunlight reaching the green space in Saperton Walk.

5. As a result of prioritising a retrofit approach, rather than demolition & rebuild, by using modern Sustainable Construction techniques, the design would easily attain a **ZERO-CARBON BUILDING**. The HfL application, by comparison, uses unsustainable materials such as concrete and has an embodied energy carbon footprint of **21,000 Tonnes** of Co2 (according their own calculations). This entirely undermines Lambeth's Climate Emergency declaration. The retrofitted alternative would be a clarion call for significantly more sustainable development.

6. THE ALTERNATIVE IS FINANCIALLY VIABLE, and is flexible enough to **INCREASE THE NUMBER OF NEW SOCIAL HOMES** for Lambeth than is currently proposed. This has been confirmed by professionally costing the proposals in detail. The alternative could prioritise much needed social homes rather than private flats for sale.

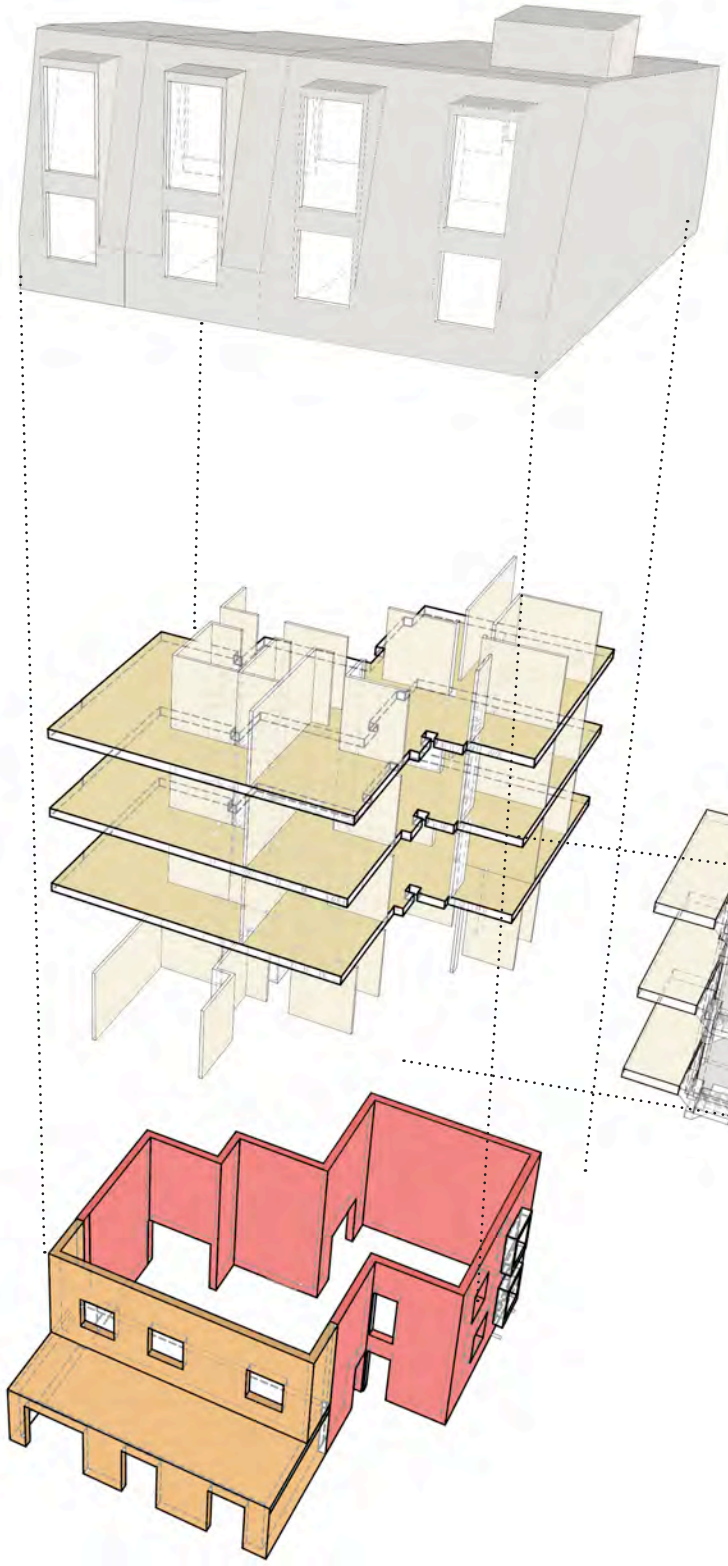
7. The works on site would only require partial demolition, and would therefore have far less impact on neighbours at construction phase, and avoid the dust, dirt and noise of significant demolition.

8. The alternative design responds sensitively to the historic context of Lambeth Walk. Like the recent local developments in Old Lambeth Walk, Lillian Baylis School, and the Newport Street Gallery (Stirling Prize 2016), it complements the neighbourhood, rather than obliterating it.

With nearly 150 objections lodged, Save Lambeth Walk was formed as a result of the public outcry about the plans, and the way in which HfL has aggressively pushed them forward. We have drawn on local expertise, including architects and financial planners, to explore an alternative approach. We have developed an illustrative alternative design which will be presented to a public meeting at Roots & Shoots on Thursday 3rd March at 6.30pm for local residents. Homes for Lambeth have been invited, as well as existing councillors and candidates for the forthcoming elections, to consider the current application and our alternative.

You can join us: contact@savelambethwalk.org : www.savelambethwalk.org https://donate.giveaseasyasyoulive.com/fundraising/savelambethwalk

Save Lambeth Walk's Alternative Design from the corner of Lambeth Walk & Fitzalan Street A combination of retrofit, extension and new build. As a modern sustainable construction, it utilises the existing structures and retains all the mature landscaping.



new roof structure

New internal CLT solid timber structural core & walls

new stair & lift core

Existing external brick structure retained front addition at ground floor level

Denby Court : The Retrofit Option

DOORSTEP GREEN COMPARATIVE PROFILES

DENBY COURT: CARBON FOOTPRINT COMPARISON

HOMES FOR LAMBETH:

PLUS 5,860 TONNES OF CO2*

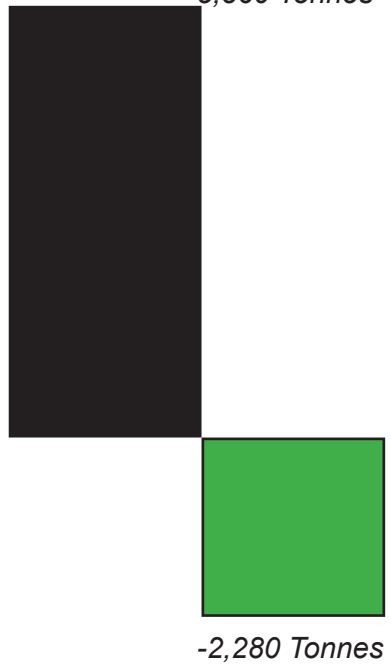
***the lowest of several contradictory figures stated in HFL's submitted Energy Report and Whole Life Carbon Statement**

**A modern 2 bed flat would typically emit 1T of Co2 eq. PA*
5,860 tonnes = 41.5 years of energy usage for the proposed 141 flats

SAVE LAMBETH WALK SCHEME:

MINUS 2,280 TONNES OF CO2

2,280 cubic metres of CLT which sequesters 1 tonne of co2 per cubic metre
ie 16 years of carbon sequestration before the scheme reaches zero carbon



Lambeth Council has declared a climate emeregency and has committed to being carbon neutral borough by 2030

ACCOMMODATION COMPARISON:

HFL scheme: 141 units o/a
395 Hab. rooms

45 x 1 bedroom flats
27 x 2 bedroom, 3person flats
57x 2 bedroom, 4person flats
4 x 3 bedroom flats
3 x 3 bedroom duplex
5 x 4 bedroom duplex.

Alternative Scheme: 141 units o/a
389 Hab. rooms

57 x 1 bedroom flats
10 x 2 bedroom /3person flats
55 x 2 bedroom /4person flats
11 x 3 bedroom flats
4 x 3 bedroom duplexes
4 x 4 bedroom flats

Both HFL and Sustainable Alternative Designs > Financially Viable

!Lambeth & HfL refuse to share business case/financial appraisal FOI request blocked (being appealed/referred to ICO)!

Desktop assessment by experienced professional based on local market sales date/cost benchmarks/published rentals

78 Private / 18 Shared / 45 Social (Council Rent) = Same as HfL (141 Total)

- **Receipts / Income**
  - At least £50m **capital receipt** from 78 private flats and 18 shared ownership flats (probably much more)
  - **Rent** from shared ownership and council flats > of perhaps £15m+ debt raised paid off out of rental incomes (or "staircasing" capital receipts as shared ownership become 100% private)
- **Comparison**
  - HFL top floor flats might attract premium but Alternative has some 3 beds for which demand
  - Overall value similar – both could be flexed (and HFL might do this!)

- **Costs /HfL Profit**
  - Both schemes provide about 9,000m^2 (accommodation before circulation space)
  - Costs (incl demolition, grounds, utilities etc 20% risk allowance,including 20% developer margin to HfL)
- **Comparison**
  - Alternative scheme savings
    - Private gym optional
    - Reduced demolition/no tree replanting
    - Avoid highrise foundations/and related plant cost
    - Reduce carbon offset payments
    - Potentially more efficient and less disruptive construction programme
  - Alternative additional cost
    - Professional fees for refurb design
    - 5% VAT on some (not all) elements of reused buildings [limited impact on overall costs]
  - Balanced
    - Re-use saving v bespoking, mitigated by offsite production

KEY POINT: BOTH schemes viable with significant surplus to Lambeth Council (as land owner)

LONDON ASSEMBLY PLANNING AND REGENERATION COMMITTEE 2025 INQUIRY INTO TALL BUILDINGS: EVIDENCE FROM THE OLD OAK NEIGHBOURHOOD FORUM.

The Old Oak Neighbourhood Forum was designated by the OPDC in 2017 and re-designated in 2023. We have 145 members living in and around the area of Acton, Brent, north Hammersmith and north Kensington now known as 'Old Oak'

This evidence takes a case study approach to a newly developed cluster of tall buildings in West Londonn and how this has emerged from developer-led aspirations rather than a 'plan-led' approach. The content is also relevant to the Planning and Regeneration Committee's role in scrutinising the work of the Old Oak and Park Royal Development Corporation.

NORTH ACTON – A NEW TALL BUILDING CLUSTER IN LONDON WHICH NOBODY PLANNED

The planning context – two local planning authorities involved

LB Ealing's current local plan dates from 2012/13 and is one of the most out of date in London. A revised version is now at Examination stage.

The 2012 Core Strategy has a policy 3.4 *To create an improved southern gateway to Park Royal* at the North Acton road gyratory. This makes no mention of tall buildings. The subsequent Development Sites DPD (2013) includes a site allocation *OISI Park Royal Southern Gateway*. The area involved is just under 10 hectares and covers the land south of North Acton station and north-east of the A40.

This area is quoted as being identified through the Park Royal OAPF as *capable of providing a new vibrant mixed use area that accommodates residential and employment space that can benefit from its good access to public transport and the strategic road network*.

This development plan document notes *Large, bulky employment buildings dominate the existing built structure and the area as a whole suffers from poor public realm with very limited amenity space. Recently completed tall buildings containing residential flats and student accommodation are clustered around North Acton Station*.

The text continues *The site is considered in principle an appropriate location for tall buildings, however the acceptability of tall buildings will be determined based on the detailed design*.

2014 saw the first in the series of New London Architecture studies on tall buildings in the capital, with 236 in the pipeline at that time (mainly commercial offices). In the same year The Tower, One St George Wharf was completed in Vauxhall, at 52 storeys. This was one of the first residential towers of this scale, to be followed by others south of the Thames and in East London.

Who planned that residential buildings of this scale should come to North Acton? Who consulted West London residents to seek their views on a major further cluster now visible from miles around?

The answer is that developer aspirations created this agenda. Ealing Council allowed student housing blocks to proliferate. The Old Oak and Park Royal Development Corporation, which became the planning authority for North Acton in 2015, then failed to exercise any strategic role in the fate of this part of London.

The outcome is a cluster of very high density towers, largely made up of small apartments and student housing, set within a traffic gyratory with low levels pf public space, non-activated ground floors, and a poor public realm. As an example of urban renewal, North Acton does not begin to compare favourably with examples in other European cities.

Given that the OPDC is a Mayoral Development Corporation, it is important that the Assembly reflects on how this outcome arose. There may be lessons for other future models of MDC in major English cities. The slow process for preparation of local plans under the current system in England has also contributed to poor outcomes.

The OPDC was established from April 2015, taking on planning functions for parts of Hammersmith, Brent and Ealing. A deal had previously been struck between then Mayor Boris Johnson and then Ealing Leader Julian Bell that the Borough Council would continue to determine planning applications in North Acton. This agreement formed part of gaining Ealing's support for establishing a MDC. The Borough argued that regeneration at North Acton was well underway and that the Borough should be allowed to finish the job.

The focus of OPDC at that time was on 'Old Oak North' and the 45 acre Cargiant landholding, for which a masterplan was well advanced. Leaving North Acton to Ealing Council was not considered to be a major concession for the OPDC. A 'scheme of delegation' between OPDC and Ealing Councils was agreed at the first meeting of the OPDC in April 2015. Councillor Bell subsequently referred to this as 'our opt out'.

Delegation of the determination of major planning applications is an unusual arrangement. Where a local authority function is delegated, the delegating body remains ultimately responsible for decisions. Legally, OPDC retained the right to retain, and not to delegate, any planning application. There is evidence that this was not widely understood for several years, by officers at both planning authorities.

Between 2015 and 2020 delegation of major planning applications at North Acton was routine, with applications forwarded on as an junior administrative task. At Ealing Planning Committee, the councillors involved would often focus debate on the quantum of S106 receipts involved and how these very substantial sums should be allocated (OPDC being content to allow the Borough the use of these sums, despite the significant shortfall in funds for necessary infrastructure to support their own local plan proposals).

The OPDC's Draft Local Plan was originally due for adoption in Spring 2017. Had this date been achieved, a clearer policy framework for North Acton would have been achieved earlier. As it was, LB Ealing was able to continue to grant planning consents for towers of increasing heights (residential and student housing) for far longer than expected – pushing to the limits the policy scope in *Site Allocation OISI Park Royal Southern Gateway*. The extent to which an OPDC Regulation 18, 19.1 and 19.2 Draft Local Plan was gaining policy weight was largely ignored at Ealing's end. Applications were forwarded to Ealing, LBE officer reports made limited reference to OPDC's draft local plan and OPDC officers did not attend relevant Ealing committee meetings.

In 2020, OPDC made some changes to the operation of the scheme of delegation and began to exert more control over decisions. But in 2022 LBE's Planning Committee was still making the decision on a part 32 storey, part 27 storey development of 462 co-living rooms on the site of the former Castle Hotel at North Acton.

In 2016 Ealing's Planning Committee gave consent to a scheme at 6 Portal Way involving four buildings of 9, 11, 32 and 42 storeys. While the tower was under construction the developers (City & Docklands) came back with a further application to add 10 storeys, consented in February 2020. In 2017 a neighbouring scheme (The Portal) was consented with a part 10, part 36 storey building. A development with two linked buildings at 45 and 55 storeys was consented at 4 Portal Way. Although the consent was not implemented at that time, revised proposals from Aldau Development for two buildings of 44 and 58 storeys on this site were consented by OPDC in 2024,

Imperial College put together proposals for a seven building scheme ranging in height between 7 and 56 storeys to provide up to 1,325 residential units and 384 co-living units or student accommodation rooms. This was consented by OPDC in October 2023. These proposals include a substantial public open space and are intended to create a new 'green heart' for North Acton.

CGI of One Portal Way

Developer Imperial College

Architects Pilbrow and Partners

One Portal Way and 4 Portal Way have been presented by their developers and architects as satisfactorily 'completing' the skyline of the new (and unforeseen) 'cluster' at North Acton. OPDC officers commented at that *the tall buildings are considered to have an overall positive impact on townscape views*.

For West Londoners in a wider area , the question remains *who and when decided that North Acton should become a tall buildings cluster*? *How do these things happen?*

The OPDC Draft Local Plan reached final examination stage in early 2022, five years later than originally intended. By that time the 2021 London Plan was in force with its new Policy D9 on Tall Buildings. At a final two days of EIP hearings, our Forum pointed out to the Planning Inspector that the OPDC Post Submission Modified Draft Local Plan failed to identify with clarity '*suitable locations'* and '*appropriate heights'* as required by London Plan D9 Part B.

Th Inspector asked OPDC for further modifications and these were hastily prepared. They cover each of the 'Places' across the OPDC area as defined in the Local Plan, and include North Acton. The modifications involved adding changes to supporting text and tables, with wording for North Acton as below:

Height ranges are provided in either 0-5 or 0-10 storey ranges. There are two exceptions to this:

- North Acton where a broader range has been provided reflecting the greater range in building heights with extant permissions, schemes under construction and recent completions within this portion of the North Acton and Acton Wells place. The heights of extant permissions and planning approvals are set out in the below table:

Site allocation / DCS site	Name	Tallest building height (storeys)	Status
12	Holbrook House	24	Completed
14	Perfume Factory North	25	Approved
15	Perfume Factory South	31	Completed
16	The Portal	36	Resolution to approve
17	2 Portal Way	35	Resolution to approve
19	Portal West	54	Under construction
35	4 Portal Way	55	Approved
DCS 36	1 Portal Way	32	Approved

As an example of a planning authority retrofitting local plan policies around the product of developer aspirations, the history of the North Acton Cluster is hard to beat. For five years from 2015 the OPDC delegated its strategic-level decisions to another planning authority. That authority had moved into a phase of pursuing ambitious housing targets through high-rise high density towers in several parts of the Borough. After 2015 North Acton was no longer to be part of a new Ealing Local Plan, preparation of which was getting underway. Consultation by the Borough with local people was not needed. Meanwhile, as a source of S106 receipts, the opportunity for a very extreme version of intensification and increased building heights in an unforeseen 'cluster' was a bonus.

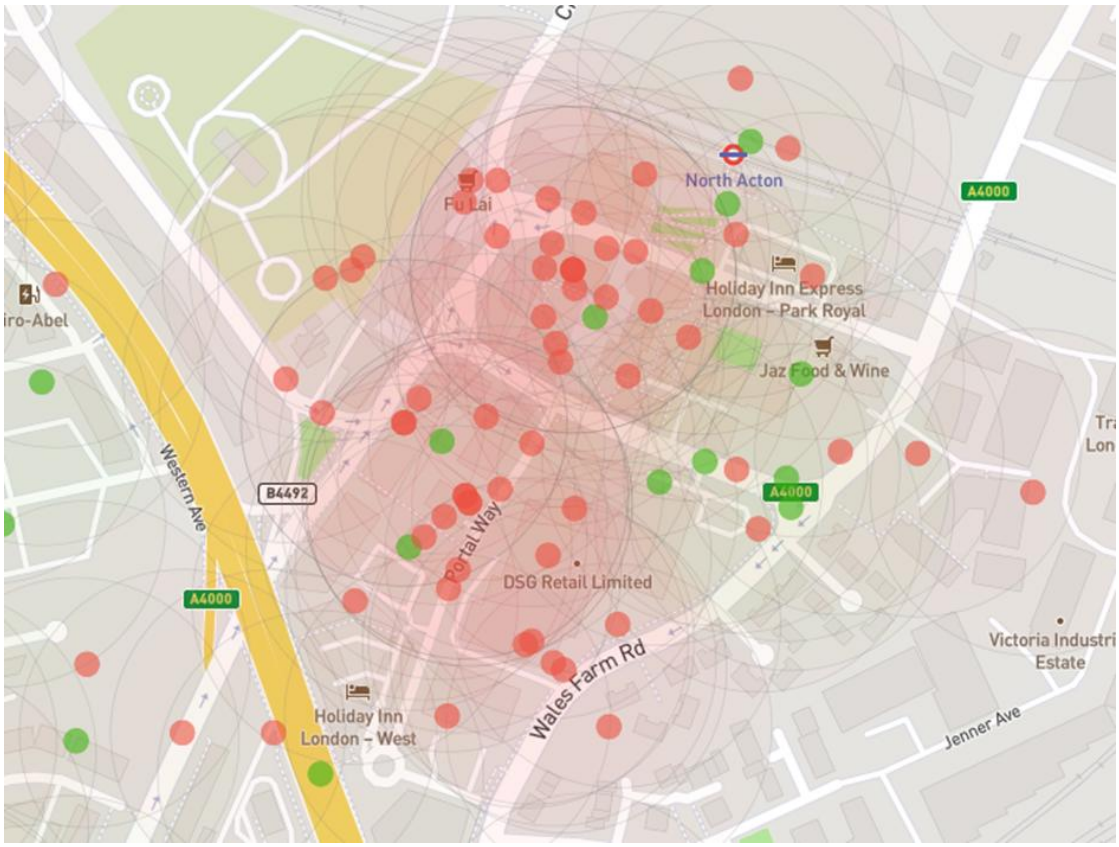
The final set of towers at One Portal Way and 4 Portal Way may or may not be built out. Final planning consent to Imperial College's hybrid application was granted in March 2024. There are no signs as yet of pre-commencement conditions being discharged. The scheme has no academic or university content, other than an option of student housing in place of co-living accommodation. Imperial has other projects to develop at White City and elsewhere, as part of its body of work on the 'West Tech Corridor'.

What has been the outcome of use of a Tall Building typology?

As a piece of 'place-making' and 'regeneration' in London, North Acton has few supporters. The cluster sits within and adjoining a major road gyratory. Even without the further additional towers, the buildings are oppressive, with wind tunnel effects and a badly maintained public realm. The initial high-rise phase involved mainly student housing blocks, including providers Imperial, Downing Students, Chapter London, SCL International College and the Rehearsal Rooms,

The boundary between 'PBSA' Purpose Built Student Accommodation) and 'co-living' accommodation has become blurred in recent years. Both types of accommodation at

North Acton are now marketed on platforms such as Booking.com. The website Inside AirBNB shows a concentration of short lets at North Acton, as below.



Developers proposing further PBSA units seek to argue that there is no over-concentration of student housing at North Acton, given that such an outcome would be contrary to London Plan Policy H15A(1). At the EIP on the OPDC Local Plan, OPDC officers provided to the Inspector a breakdown of PBSA units and stated *The remainder of the housing supply target for this place is currently expected to be provided as conventional housing*

We challenge this predicstion. On our figures, there will be over 5,300 units of student accommodation at this location as and when pipeline schemes are completed. OPDC Place Policy P7 for North Acton *envisages a minimum of 8,000 new homes, including early delivery of a minimum of 5,250 new homes to support OPDC's 0-10 year housing supply.* We appreciate that every 2.5 student units currently equate to one conventional housing unit. But on simple numbers, North Acton looks more likely to see 5,000 PBSA units built in Years 1-10 (2018-28), than a minimum of 5,250 new conventional homes.

The feel of the place at present is very much student dominated. The range of shops is limited and several of the major developments have ground floor commercial units which remain empty rather than 'activated'. There are a number of coffee shops and fast food outlets, a Chinese grocery store (Fu Lai) and an Asian supermarkets (Tian Tian).

Densities

With point block towers on constricted sites, densities at some of the developments at North Acton have far exceeded anything contemplated in the days of the London Plan Density Matrix (which had a maximum desibity of 405 dwellings/hectare).

4 Portal Way (previously approved scheme) 4,615 dwellings/hectare

6 Portal Way (one West Point) 2,121 dwellings/hectare

North Acton features as a case study in the 2023 publication *What is the Future of High Rise Housing – Examining the long-term social and financial impacts of residental towers*. The area is compared alongside Kings Cross, Vauxhall Nine Elms Battersea, and the Olympic Park, with analysis as below.

Extract from *The Future of High Rise Housing*

NORTH ACTON	33 hectares core development area
	Current population circa 6,000 (including 1,000 students)
	Projected population circa 19,400 (17,000 residents and 2,400 workers)
	0.6 hectares existing and projected public open space
	0.31 m² public open space per person
	Plus 4.0 hectares nearby open space projected beyond the core to serve the wider area
	Ealing average open space per person 47 m²

North Acton falls within the London Borough of Ealing, with planning policy and development control shared with the Old Oak and Park Royal Development Corporation (OPDC). It forms part of one of London's largest Opportunity Areas. North Acton Town Centre covers an island of some 33 hectares of land defined by major roads lying on the north side of the A40 and focused on North Acton station.

Development has been brought forward incrementally by landowners and without the benefit of an overarching masterplan. Around 2,500 apartments and 1,000 student rooms have been built here in the past 10 years, mostly in tall buildings ranging from 12 to over 50 storeys. The only public open space built so far is Station Square, which provides around 1,650 m² of mostly hard landscape. The current planning application for 1 Portal Way contains a public park of some 0.43 hectares, which will no doubt be very well used. We are not aware of other proposals for public open space within the core area: it is possible some will come forward on the remaining undeveloped sites alongside further tall buildings. Assuming 1 Portal Way proceeds, then some 0.6 hectares of public open space may have to serve an overall projected (2038) population of over 17,000 residents and 2,400 workers – around 0.31 m² per person.

We view this study as **one of the most relevant to the questions which the Planning and Regeneration Committee are examining.** It addresses the social and financial consequences for occupants of the 1995- 2025 'second wave' of residential towers in London.

The financial arrangements behin the currently widespread Build to Rent model of high density high-rise accommodation, as well as the environmental sustainability of this built form (which the committee has previously investigated in depth) remain important topics on which public awareness remains limited at present.

The implications of the Build to Rent model, and the way in which occupants are finding themselves having to deal with escalating service charges and major maintenance costs, remains insufficiently explored territory. **We hope that this inquiry by the Planning and Regeneration Committee will raise greater public awareness.**

CGI of the completed North Acton Cluster

Summary of responses to the Inquiry's Key Questions

1.What are the experiences of residents in tall buildings, and how do those experiences differ amongst different groups, including students, families, older people and disabled people?

The North Acton Cluster has an unusual demographic with a high concentration of students, young couples, and tourists using short-let accommodation. The famliar

problems experienced by families in residential towers are less of an issue. Baby buggies are a rare sight on the streets.

But problems of isolation and loneliness remain, especially for students from abroad. The commercial PBSA towers may have some amenities 'on site' in the form of a gym, laundrette, co-working space or even a cinema. But North Acton has not been planned as a coherent university 'campus' or 'student village' with shared facilities for the several thousand students who will ultimately make up the demographic. Lack of activities or entertainment in the immediate area is a refrain on student accommodation blogs and websites.

2. What are the long term impact of tall buildings on communities, the environment, and health and wellbeing of residents?

As above, this 'cluster' is atypical of London. We do not see the building typology as adding the experience of students or residents. Access to public open space is very poor, even if this is improved by the building out of Imperial's One Portal Way.

One of our members who has lived recently in a tower block close to North Acton station has summarised the characteristics of the location as follows:

- no sense of community within the blocks or the wider area of blocks. Cut off from the real world

- total lack of open / green space to do anything - lunch, exercise, fresh air, walk dog, and North Acton playfields is an unpleasant 20+ mins away, if you include the waiting for the traffic on the A40.

- lack of amenities (a GP surgery being a prime candidate which comes up at consultations on proposed new developments)

- A40 really cuts it off from the rest of the world - it can add 5-10 minutes to a journey waiting for the lights

- Lack of parking for anyone, there's no 'open' parking at all. I know the London Plan wants 100% car free, but means everything from quick stops, Ubers etc have nowhere to stop, even briefly (10 mins or so)

- The main gyratory (where the station is) can become very congested as people risk parking on double yellows, even double parking. At night time (when the students go out) it's crazy chock-a-block.

- Lack of parking and the A40 cut off probably adds to empty units, some of which have been empty since 2007 - given the area population, this is odd.

- For some reason, businesses really seem to struggle - many that have opened, closed. Its only chains which seem to weather the storm.

- No sense of ownership with the temporary residents - Air B&B, students, short term rentals (so no one cares about rubbish, noise, dumped Lime bikes etc)

- Severe lack of natural light

- It's a wind tunnel, and every block adds to this

Constant building work in progress including the impact of HS2 compounds and works on Victoria Road

High rise towers which are known to be a relatively unsustainable and high cost type of building with high embedded carbon.

Other OONF members familiar with the area describe a transient demographic with the current two Holiday Inn hotels, co-living units, and whole apartments in the newly built towers already appearing on AirBNB and other online platforms for short-term lets. Local people see little evidence that the new housing units built at North Acton are meeting the need for family homes in Ealing.

3. Are Boroughs and the Mayor considering the wider impacts on Londoners of new tall buildings when granting planning permission, and to what extent they are helping meet London's housing need?

We accept that this building typology has added to delivery of housing numbers but (in our view) at a significant cost in the long-term. 'Urban extensions' in e.g. Paris, Amsterdam and Vienna (Seestadt) have not been built at anything like the heights and densities now prevailing in the OPDC area.

4. Are there good examples of tall buildings in London? What are the key features that made these successful?

We struggle to identify recent successful **residential** tall buildings in London.

5. How should the new London Plan (and local development plans) accommodate tall buildings as part of a mix of housing typologies?

Had London Plan Policy D9 on Tall Buildings been implemented as clearly intended in the December 2020 Direction by the then Secretary of State, Londoners would have had a chance at the early stage of local plan preparation for meaningful consultation and dialogue on which locations in their area were 'suitable' for tall buildings, and what heights were 'appropriate'. Well drafted local plans, with good quality maps and use of digital tools to show the impact of tall buildings, would allow the public to be aware of what was planned for their immediate environment.

In the event, the outcome of the Hillingdon judgment coupled with an overly flexible interpretation of Policy D9 Part B has severely lessened the impact of the 2020 intervention by the Secretary of State. The GLA Planning Decisions Unit has adopted a

very relaxed approach to Stage 1 and Stage 2 decisions on developments involving tall buildings, allowing justifications based on the criteria in Part C of Policy D9.

Most London LPAs have been willing to adopt the same approach, in the face of sustained ambitions for height put forward by developers, underpinned by land values and financial viability assessments that have become self-reinforcing and self-perpetuating in a London context.

Firm resolve will be needed by the Mayor and Assembly to change this context in the next London Plan. There would seem to be a chance, with effective dialogue with Government on a new towns programme and willingness by the Boroughs to release grey belt land, for such change to be brought about.

Old Oak Neighbourhood Forum March 2025