LONDONASSEMBLY

City Hall
The Queen's Walk
More London
London SE1 2AA
Tel: 020 7983 4000
www.london.gov.uk

Andrew Boff AM
Chair of the Planning and Regeneration Committee

Nicky Gavron AM
Deputy Chair of the Planning and Regeneration Committee

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Planning & Regeneration Committee
Consultation Response, Good Quality Homes for All Londoners London Plan Guidance

The London Assembly Planning & Regeneration Committee (the Committee) welcomes the opportunity to respond to the consultation on the Good Quality Homes for All Londoners London Plan Guidance (the Guidance), setting out the Mayor's design led approach to optimise land for residential development.

In its past work, the Committee has raised concerns about the increasing number of tall buildings being developed in London[1], and their impact on neighbourhoods and, more widely, London's character. Tall buildings can be costly to build, operate and maintain, are not best suited for family housing, which is much needed in London, and can have significant environmental impacts. These issues should be carefully considered in development proposals.

The Committee's response is informed by the evidence presented in:
The Planning & Regeneration Committee meeting on 21 October on design, density and typology;
The Planning Committee meeting in 2018 on tall buildings;
The Planning Committee meeting in 2018 on density;
The Planning Committee meeting in 2014 on tall buildings.

[1] See for example NLA Tall Buildings Survey

The Committee renews its call for a clear policy distinction to be drawn between tall buildings for residential use and tall buildings for commercial and mixed use, particularly given that approximately 89% of tall buildings in the pipeline in 2019 were residential[2]. The use needs to be considered in determining the design and configuration of a tall building. In addition to points made in response to The Good Quality Homes For All Londoners consultation SPG, the committee believes that further guidance is required in the form of a separate SPG or set of SPGs which should include consideration of dwelling typologies, size mix, space standards, tenure mix and amenity space.

As tall buildings are of a particular interest to the Committee, our comments focus on the housing type 'tower', and how this typology performs against the housing standards (Module C). The Guidance should clearly set out the expected design quality for tall buildings, whilst requiring developers and boroughs to exhaust all other ways to achieve higher density. Sunand Prasad (Penoyre & Prasad) presented this idea in a Planning Committee in June 2014:

"if a [residential] tower is proposed or a tower is thought about, to address density issues, then it should be required that alternative methods of achieving the same goals and densities should be demonstrated, shown and considered, as a prior condition; so that it [residential tower] is not immediately seen as the answer, but that alternatives should be presented, which is normal policy in so much as good governance, design and implementation of property moves."

Although the Guidance maps the performance of some of the housing standards (presented in Module C) against the typologies, **the Committee takes the view that a broader range of the housing standards and the issues they pose, should be considered against the 'tower' type, in particular.**

The Committee therefore proposes that in the table presenting 'tower' typology's performance against the housing standards (Module A, p. 63), more examples are considered. Some of the issues that should be better reflected are listed below (although this list is not exhaustive):

In Module A, p. 63, under 'Designing for a Diverse City' the Guidance should highlight how the tower typology performs against standards that ensure there is both sufficient provision of family sized homes, and that those homes have appropriate access to amenity etc. The Committee has long advocated for more family sized housing to be built in London but believes that family homes in tall buildings are only appropriate with certain design measures in place, for example access to amenity such as play space and suitable positioning within a development. Careful consideration needs to be given to the way tall buildings meet the ground and relate to the streetscape, particularly in this typology.

[2] NLA, Tall Buildings Survey 2020

The Committee would also like to see issues to do with maintenance and services charges considered under 'Future Proofing' as this is particularly pertinent to towers. Servicing tall buildings can be costly and this often results in high service charges to residents. While the standards (Module C) set this out in general, this issue is particularly pertinent in the tower typology and therefore should be included in assessing the typology's performance (Module A, p.63).

By expanding on the examples given – and also making the possible negative impacts more explicit – the Guidance would set the expectation for high quality design more clearly.

Similarly, the Guidance would also benefit from including more case studies on tall buildings, and demonstrating how some of the challenges inherent to this type have been addressed in practice.

Finally, the housing standards need to stand up in the changing context of post-Covid – the pandemic and the lockdowns that have resulted have highlighted the critical importance of access to greenspace, private outdoor space, outdoor play space, and adaptability needed for home working, among other things.

Committee comments on 'tower' type and housing standards

The Guidance defines 'tower' as a building with 10 storeys[3] or more, but no other distinction between different heights within this typology is made. At a Committee meeting in October 2020, Jo McCafferty (Levitt Bernstein) noted that there is a significant difference in designing a 25-storey tower or 42-storey tower and a 10-storey building. There is a wide range of reasons why this is important, ranging from environmental to operational. For example, robust public and shared amenity space is crucial in buildings over 10 storeys as, for example, balcony space at very high levels can be very uncomfortable due to exposure to wind and heat. All flats must have balconies and, where an exterior balcony is not feasible, these should be recessed. Balconies, however, must not be substituted for easily accessible play, informal recreation and amenity space.

In the same meeting, the Committee also heard from Professor Philip Steadman (UCL Energy Institute) that there is a big difference between buildings of these heights in terms of environmental impact. This has also been discussed in previous Committee meetings, for example by structural engineer Jane Werning (2014) stating that as buildings get taller, the amount of energy and material used in construction will grow disproportionately as buildings get taller.

In the London Plan Examination in Public, the Planning Committee presented that there is a growing evidence base which demonstrates that tall buildings are less

[3] The Committee notes this may be subject to change following the Secretary of State's Further Directions to the London Plan Tall Buildings Policy, on 9th December 2020.

sustainable than those which provide similar quantum of development in other configurations. Energy use is higher in tall buildings with electricity use twice as high due to increased solar gain, as well as other conditions prevalent at higher altitudes, including more wind and colder temperatures. The taller the building, the higher the amount of embodied energy required per useable square metre as low-carbon materials such as timber are not viable. Tall buildings also suffer more from heat losses for the same amount of insulation as lower buildings because of the higher wind speeds.

The Committee would like to see the Guidance better reflecting the differences within this typology, the differing operational requirements and environmental impact, based on the height of a tower.

The Guidance should also be updated to reflect the latest Directions to the draft London Plan on tall buildings, including the default definition of a tall building as six storeys or more.

Tall Buildings & Density

The Committee is concerned that tall buildings, whilst delivering higher densities and therefore seemingly making more effective use of land, will not produce the high-quality homes and neighbourhoods that London needs.

In past meetings, for example the meeting on Tall Buildings held in September 2018, the Committee heard from guests that alternative means of achieving the densities that tall buildings achieve should be exhausted before proceeding with building tall, as presented in a Committee meetings in 2014 and discussed above. **The Guidance should also distinguish between high density and 'superdensity' (above 350 dwellings per hectare[4] ref Levitt Bernstein) – the latter of which is primarily configured with tall building typologies. The Committee would like to highlight that as density is defined in several ways in the Publication London Plan, the committee feels that the definition of bed spaces per hectare is most appropriate.[5]**

The concerns relating to density are made all the more pertinent in light of the removal of the Sustainable Residential Quality Matrix. **The Committee has argued for the density matrix to be revised and objected to its removal in the past and would like to reiterate it here: a steer on densities in the form of the matrix together with the design led approach would make for a stronger framework to support optimising development. Proposals for tall buildings should be required to demonstrate that other building configurations, which would achieve similar densities, have been considered.**

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[4] https://www.levittbernstein.co.uk/research-writing/superdensity-the-sequel/

[5] Publication London Plan, p123

The Guidance should demonstrate through case studies how the same density can be achieved on the same site using different configurations.

Assessing the 'tower' typology's performance against the housing standards, the Guidance rightly makes reference to how towers "should be planned as part of a broader tall buildings strategy in an area."[6] The Committee believes this requirement should be made stronger.

The Committee does not believe that tall buildings are the answer to London's housing needs and should not be encouraged outside of a few designated and carefully managed areas – therefore, the Guidance should be strengthened in this respect.

Family homes and housing mix

Tall buildings tend to contain a majority of mainly studios and one- beds, and a proportion of two-bedroom flats, therefore resulting in a lack of family sized housing and poor use of space, due to the duplication of kitchen, bathroom and circulation space. High density housing can be achieved by approaches that are more suitable for families, are more in keeping with London's traditional form, and are less intrusive on the skyline. This is examined in the Planning Committee's January 2016 report: 'Up or Out: A false choice' and set out in a unanimous motion and letter to the previous Mayor in March 2015.

Evidence has shown that tall buildings tend to result in large monocultures of a single tenure or particular demographic, and that the creation of mixed sustainable communities is more challenging. In this respect, the typology does not perform well in relation to the standards on housing mix standard C2.1 Diversity of residential development.

In addition, high management costs and service charges often preclude affordable tenures, and well-designed family homes are harder to achieve as they are remote from shared amenity space. It is difficult to achieve a mix of unit sizes in tall buildings where all floor plates conform to the same configuration, typically leading to a larger proportion of small units and single aspect homes. **The Guidance should therefore consider the performance of tall building against the standards relating to diversity and housing mix, and whether or not tall buildings are suited to meet London's diverse housing needs, particularly in respect of family and affordable housing and creating inclusive communities.**

The Committee welcomes the recognition of how good design of communal spaces can support children's independent mobility and informal play, and would like to see more examples of where this has been done well across all types of housing. The standards should also clearly recognise the challenges different building types may

[6] Module A, p. 63

pose: for example rooftop play in a tall building is problematic because of microclimatic conditions and difficulty with supervision. In the past the Committee has recommended family sized homes to be located no higher than on 5th storey.

Development of towers should only happen after robust evidence has been presented about how their social impacts will be mitigated. **The Guidance should encourage a mix of unit sizes and tenures in tall residential buildings including a requirement for larger family units on the lower floors, where access can be provided to communal play space. Families should not be housed above the fifth floor in public housing, and that consideration should be given to design of access and surveillance of children's play space and amenity space for children, specifically to amplify C1.4.2 in relation to tall buildings.**

The Committee is concerned that there is only one case study of a building over 20 stories in module D of the Good Homes SPG, and that this case study does not provide the number of units, size-mix or tenure breakdown of the tower itself. The committee feels that it is important to give the number of units, size-mix and tenure breakdowns of each of the buildings in a development, as well as for the development over-all.

Finally, the Committee believes that the design guidance should clearly raise expectations for **fire safety standard particularly in relation to tall residential buildings.** While we understand fire safety will be covered by a separate London Plan Guidance, it seems vital that fire safety standards are highlighted at every opportunity.

Cost – building, operating, maintenance

The Committee has previously highlighted how the financial cost of build increases disproportionately with taller buildings – in construction, maintaining and operating a building – in many cases leading to high services charges to residents. The standard 'C7.3.1 Development proposals should be designed to take full account of future maintenance practicalities and likely costs' is a welcome development, and the Committee believes the Guidance should consider how 'tower' as a type performs against this standard.

In a meeting on the 21 October 2020, the Committee heard how research commissioned by the London Borough of Tower Hamlets found that the maintenance and management of buildings, and how buildings operate as a system, is an important design issue that needs to be addressed for good quality outcomes. For example, lack of understanding of 'buildings as systems' could impede the maintenance and servicing. Seemingly mundane things such as appropriate, functioning space for care taking may be overlooked yet this is vital for the successful maintenance and operation of buildings, and of tall buildings in particular. Poorly designed systems for care taking (from waste, energy to water management) could potentially undermine other objectives, such as carbon reduction, but also result in poor service to residents.

In the same meeting, the Committee heard how the landscape of ownership and tenure of building is changing. Whereas in the past tall buildings tended to be built

solely for social rent, there is a now a mixture of renters and leaseholders in tall buildings. This leads to an issue with regards to the long-term cost and maintenance of those buildings because it results in a multitude of different leaseholders, who may well be facing very substantial one-off costs but also making it difficult to maintain a building. The works relating to cladding remediation and building safety are a case in point, but also the more routine maintenance and upkeep of a building.

The Committee thinks the practicalities and costs, including long term and lifetime costs, associated with tall buildings should be carefully considered in development proposals. The Guidance should more explicitly draw attention to how 'towers' perform against standard 'C7.3.1 Development proposals should be designed to take full account of future maintenance practicalities and likely costs'.

Tall buildings and environmental impact

The Committee has previously noted the environmental impact both in construction and operationally, the impact on neighbourhoods environmentally, as well as the surrounding urban fabric, including any protected areas.

In the 21 October 2020 meeting, the Committee heard how taller buildings will have higher embodied carbon due to their construction, primarily because of the stresses on the steel frame and the foundations. Height also means more exposure to stronger winds and colder climates, and therefore increased energy consumption.

Tall buildings can also be built in 'clusters'. Clusters of tall buildings can benefit from easy access to public transport and local amenities, which can make such clusters desirable. Clusters can, however, also have some negative environmental impacts that require mitigation at the design phase. This includes microclimates in the form of wind effects, sun to ground reflection effects, air pollution effects and the urban heat island effect.

There is a growing evidence base which demonstrates that tall buildings are less sustainable than those which provide similar quantum of development in other configurations. Module A in the Guidance is fairly light touch on the environmental impact of towers, and **the Committee believes there are a number of issues that should be raised, in addition to the more sophisticated modelling needs for air pollution and overshadowing, in the description for this housing type. The whole life cycle impact of tall buildings (The whole lifecycle impact should include the carbon emissions from extraction, processing and transport of materials to site as well as the additional emissions construction, energy from plant and waste and after completion maintenance, refurbishment, demolition and disposal.) and the embodied and operational carbon footprint, should be given more attention with regards to the tower typology**.