

London Assembly Planning Committee

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Boris Johnson
Mayor of London
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Our ref:
Date: 9 March 2015

Dear Mayor Johnson,

Tall buildings and London's skyline

I am writing to you as Chair of the Planning Committee to follow up some of the issues that have been developing over the last few months in relation to London's skyline and the impact of the growing number of tall buildings we have seen springing up.

Research last year by New London Architecture identified 236 buildings of 20 storeys or more in the development process¹. CBRE has identified 31 that will be under construction this year². The cumulative impact of these developments on London's heritage, character, and architectural distinctiveness is not being thoroughly considered. 80 per cent of these buildings contain residential, and the majority are solely residential.

When you announced your revised housing strategy, in 2013, you went on record as saying that "we've got to build 42,000 new houses every year, but it won't mean towers are 'popping up all over London". However, an increasing number of proposals for tall buildings are being submitted to you for approval. It is estimated that around 600 strategic applications for tall buildings have been referred to you since 2008.

Tall buildings can make a positive contribution to city life and the skyline, but only if they're in the right places, meet the right needs, and interact well with the character and identity of the immediate and surrounding area.

¹ New London Architecture. "London's Growing Up!" April 2014:
http://www.newlondonarchitecture.org/dls/TB_B1.pdf.

² "Boom in housebuilding as London reaches for the sky." The Times. 30 December 2014:
<http://www.thetimes.co.uk/tto/business/industries/construction-property/article4309335.ece>.

At the Committee's meeting on 10 June last year the Deputy Mayor for Planning and invited experts discussed the issue of tall buildings and London's skyline. The Committee looked at why the number of proposed tall buildings is on the rise, whether residential developments will really meet London's housing need and if planning policies are up to the task and being adequately applied in the face of so many tall building applications.

Members of the Committee were firstly interested to understand the reasons for this sudden explosion in tall residential buildings. Our initial assumption was that the increase in these buildings may be a response to the pressures on local authorities, and for you, to deliver more housing at a time of very high land prices.

However the Architects Journal /Observer campaign, maintains that: "most of the proposed towers are not vital to London's prosperity and financial wellbeing. The majority are residential, but they are neither essential to meeting housing needs, nor the best way to achieve greater densities".

Peter Rees, planning Professor at UCL, and former City Corporation Chief Planning Officer, who attended our June meeting, told us that these towers are not a necessary response to London's housing need, higher densities can be achieved by alternative means and they are more likely to "appeal to the actual people who need homes in the homes market in London, rather than the international investment market." From his own experience, he told us these residential towers represent a "huge degree of underuse and emptiness."

We then discussed how far these towers are contributing to meeting London's affordable housing need. We were reminded of the Royal Town Planning Institute's evidence to the House of Commons as far back as 2002 that suggested that "achieving high residential densities in tall building in the 1960s was not a solution for social housing or for housing families. More recently, there have been indications that it may work better for young professionals, or single people. Where incomes are higher, management and maintenance costs can be more readily taken on board, and sense of ownership fostered."

The suggestion that this kind of building is necessarily far from affordable, and in any case does little to contribute to London's overall housing need, was highlighted to us by Rowan Moore, the architecture critic of The Observer. He quoted the example of Ludgate House, a new 47 storey tower, the top 27 storeys of which actually delivers 65 only flats. This undermines the argument that tall buildings are necessary to achieve the levels of high density required to meet London's housing need. He also told us "If you are talking about housing that Londoners need, a studio flat in 1 Blackfriars starts at £1,080,000." He concluded that these towers "are not really serious contributions to London's housing need."

Even where properties are conceivably affordable to buy, the running and maintenance costs result in very high service charges.

The Committee also explored the impact on heritage. London is a constantly evolving city and already 11 tall buildings are listed; however, tall buildings have a significant negative effect on London's other heritage assets. Nigel Barker, Planning and Conservation Director at English Heritage, told the Committee that the existing historic environment "is not being recognised and is not being clearly weighed in the balance in the way that the national

planning framework requires to be done.”³ London’s heritage, including its iconic historic buildings, famous vistas, and distinctive neighbourhoods, is a unique selling point which brings numerous benefits for tourism and inward investment, yet is being undermined by the redrawing of its skyline.

Experts suggested that tall buildings do not achieve levels of environmental sustainability that should be expected. Jane Wernick, director of Jane Wernick Associates, told the Committee “from the point of view of embodied energy and carbon footprint, the taller the building the higher the amount of embodied energy required per useable square metre.”⁴ This is largely due to the materials because low-carbon alternatives such as timber are often not viable in tall buildings. The Committee also heard that “tall buildings suffer more highly from heat losses for the same amount of insulation as lower buildings because of the higher wind speeds” and are not conducive to renewable energy.”⁵

In conclusion, the Committee heard that London runs the risk that the cumulative impact of these developments is going to have an irreversible negative impact on the city. We need new policies, and to better implement existing policies.

Sunand Prasad, a founding Commissioner of the Government’s Commission for Architecture and the Built Environment and RIBA President from 2007 to 2009, suggested to the Committee that where tall residential schemes are proposed to achieve new homes at higher densities on appropriate sites, then it should be a requirement of the London Plan that alternative methods of achieving the same goals and densities should be demonstrated, shown and considered, as a prior condition before a final scheme is put forward for approval. This forms the basis for what we consider to be the most crucial recommendation (see below, Recommendation 6).

It is well known that tall buildings are not the only approach to achieving higher densities. For example, the Kings Cross development achieves high levels of densities through good urban design and only one building exceeding 16 storeys. I would refer to you the discussion that took place at the Planning Committee on 11 March 2014.

Create Streets have argued that it is not necessary to build tower blocks to achieve high housing density, and that well-designed street-based developments can achieve higher densities than towers would produce. Their proposed alternative scheme for the Mount Pleasant site “increases the Royal Mail’s proposed housing density by around 7 per cent (from 681 units to an estimated 730) and does so in a way that would generate better links to surrounding streets, homes & shops and more value.” It also features pedestrian routes that are “75 per cent more accessible” and “puts green spaces at the heart of the community”.

As you are aware, the Assembly has supported the call made last year by the AJ and Observer’s Skyline campaign to improve the quality of the capital’s tall buildings. On 5 November 2014 the Assembly unanimously passed a motion that set out our concerns on the issue. The motion called on you to:

³ [Transcript](#), p. 35.

⁴ [Transcript](#), p. 42.

⁵ [Transcript](#), p. 42-43.

1. Establish a 'skyline commission' to advise on the design impact of tall buildings.

A Skyline Commission could look at the totality of tall building development in London and assess the impact that it is having on the shape of the city. An independent commission made up of experts from a range of disciplines could provide advice throughout the process, from the selection of architects through to detailed construction.

2. Adopt more detailed and rigorous master planning in relation to tall buildings, especially within Opportunity Areas.

The London Plan emphasises that: "The Mayor expects [opportunity areas] to make particularly significant contributions towards meeting London's housing needs." Future proposals are therefore likely to also be located in areas which have so far largely been devoid of tall buildings, like many of the 38 opportunity areas designated in the London Plan. Many of the planned new towers are in the regeneration zones and opportunity areas of east and south London - Tower Hamlets, Lambeth, Greenwich, Newham and Southwark will between them have 140 of the 236 towers identified by New London Architecture. The Mayor must therefore adopt a more rigorous master planning process, including much more extensive public consultation, in London's Opportunity Areas to ensure future development results in a network of sustainable settlements that do not pose a threat to London's heritage, character and architectural distinctiveness.

3. Draw up a London Plan policy that formalises the 'clusters' policy for tall buildings.

At the Committee's meeting in June there was much debate about how the principle of 'clusters' of tall buildings are managed in London. However, without specific and formal guidance about what this means in the London Plan it appears that 'clusters' of buildings are being allowed to develop in an unplanned way - Vauxhall being a prime example of how applications are allowed even where they do not comply with the original planning frameworks. Clusters, as well as individual tall buildings, should also be considered from a range of levels and from different viewpoints both locally and across London.

4. Undertake a review of existing protected views, with the intention of adding new viewing corridors.

The London View Management Framework explains the policy framework for managing the impact of development on key panoramas, river prospects and townscape views. I would refer you to the London skyline debate in April 2014 when short comings of the Framework were discussed. It appears to some to only protect strategic views of St Paul's and the Palace of Westminster, and only applies to certain zones. We would encourage the Mayor to review this guidance in the light of the towers being proposed.

5. Support the development of a fully interactive 3D computer model of London's emerging skyline.

This model would show the precise location of each of the planned towers to enable professionals, politicians and the public to see what is proposed in their local areas and,

crucially, to get a sense of the cumulative effect of these towers on the city. I am encouraged by the support you appear to have given this suggestion in the Deputy Mayor's comments on the skyline campaigns recommendations that were reported in October.

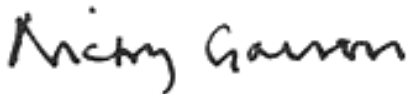
6. Adopt a requirement for all developers with proposals for tall buildings to consider other building configurations.

Alternatives to building upwards need to be presented before a final design approach is given permission. This is happening at Mount Pleasant now, where Create Streets and the local community have come up with an alternative vision that, while not containing high rise elements, manages to increase the Royal Mail's proposed housing density by around seven per cent and does so in a way that would fit in more appropriately with London's traditional form.

With the continuing pressure for tall buildings, London cannot afford to wait for the new London Plan in 2018/2019. We need new and improved policies now, and for those policies which exist to be interpreted in light of this evidence.

I look forward to receiving your views on the points contained in this letter.

Yours sincerely,

A handwritten signature in black ink that reads "Nicky Gavron". The signature is written in a cursive, slightly slanted style.

Nicky Gavron AM
Chair of the London Assembly Planning Committee

Cc: Sir Edward Lister, Deputy Mayor for Planning