

Policy 7.7 of the current London Plan is replaced by Policy D8 Tall Buildings. This provides a much more detailed approach to the location and design of tall buildings.

The first major difference between this policy and Policy 7.7 is the definition of a tall building. Policy 7.7 states that tall buildings are :

- Are substantially taller than their surroundings;
- Cause a significant change to the skyline; and
- Are larger than the threshold sizes set for the referral of planning applications to the Mayor (currently above 30m in height)

Rather than providing a definition similar to the above the Draft Policy D8 puts the onus on the London Borough's to define what constitutes a tall building in their Development Plans.

The new policy also shifts the onus on the Boroughs to identify locations for tall buildings. Policy D8 removes the requirement that tall buildings are limited to the CAZ, opportunity areas, intensification areas and town centres. Instead it states that local Borough's should identify where tall buildings are appropriate in principle taking account of:

- 1) the visual, functional, environmental and cumulative impacts of tall buildings
- 2) their potential contribution to new homes, economic growth and regeneration
- 3) the public transport connectivity of different locations.

The policy then sets out in some detail the impacts that local authorities should use to determine both the suitable locations for tall buildings and deciding development proposals. These are broken down into visual, functional and environmental impacts.

Whilst useful, these criteria omit some of the criteria related to urban design and character. listed in Policy 7.7. This states that tall buildings should:

- Only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building: and
- Relate well to the form, proportion, composition, scale and character of surrounding buildings, urban grain and public realm (including landscape features), particularly at street level;).

Therefore, if a local authority wishes character or urban design to help guide location of tall buildings and assess planning applications it has no back up from the London Plan.

If Boroughs are to be responsible for determining appropriate locations for tall buildings and what constitutes a tall building they must consider the local character. This is a fundamental reason why the definition of a tall building must vary across London. This must be captured in the new policy.

Laura Hart
Urban Design Associate