

# mr Alan Leibowitz comments

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Development design should not only "respond" to local context but should also respect, be in harmony with and take cues from local building forms and street patterns. The concept of "respond" on its own allows too much argument and subjectivity about whether such response is appropriate and whether it sits well in urban design terms with the local context.

Development design should not only respect the local heritage but where the scale or height of a proposal impacts on areas distant to the development site the heritage and character of the distant areas should also be respected and enhanced.

Scheme proposals for larger sites should include a variety of building types and sizes, as occurs in many parts of London, creating spatial interest and allowing for changes of use over time.

Material choices are key and natural materials should be encouraged as these are more germane to London's building types and are ultimately more sustainable.

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Support - Development plans and area-based strategies should include comprehensive consultation with local communities. This will help to determine the optimum form of development the best chance of any new development being integrated into the existing socio-economic and built environment.

The use of 3D modelling and visualisation should be compulsory for schemes above a given size, and not only implemented "where possible".

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The use of the term Public Realm does not designate whether these areas are in private ownership or are adopted by the Local Authority. Wherever possible public realm should be truly public and be adopted in the same way that most of the public spaces in London are truly public.

The planting of indigenous London street trees should be a requirement on new streets and other public spaces. These provide environmental advantages and also help to knit the new areas into the overall fabric of the city.

The policy should generally discourage tall buildings in London. The Mayor should go further and propose a moratorium on any further tall building consents in London, until such time as the impact of current tall buildings has been properly assessed by a body comprising urban designers, urban historians, architects, economists, social policy makers and other experts. This is too important a subject to leave to vague policies such as "well designed buildings in appropriate places" This is a fudge, and adds nothing to the preservation, conservation and good-stewardship of this great city.

This proposal is not one which is at all intended to be "developer-bashing". To the contrary, developers have contributed hugely over the generations to making London the great world city it is. Developers will work efficiently and productively within the planning system and we will benefit from their endeavours. The proposal to stop tall buildings will impact on land owners, because they achieve a disproportionate share of the additional "profit" which arises from the granting of consent for a tall building. This additional value is a social-good and too much of it accrues to a person who happens to own the land.

A tall building is better suited to a commercial building than a residential building. The former tend to be designed and built to a much higher standard than residential buildings. The latter suffer from the type of tenure which we have in England. This results in fractional ownership which mitigates against the proper repair and maintenance of expensive buildings over time. Individual lessees, faced with the cost of very high service charges for, say, facade repair or replacement, will either not be able to afford it or will seek to place the responsibility elsewhere. This does not bode well for what these buildings will look like in the decades to come. [The levying of appropriate sinking funds in service charges should be a condition of planning consents for tall buildings. Service charges typically do not provide for depreciation because it has a negative effect on the selling price of a unit. It is not enough to say as in Policy C1.c that quality materials should be used. There needs to be a positive obligation on the developer to ensure that future maintenance and renewal is properly funded from the very beginning - or else it will not be.]

The phrase "tall buildings have a role to play....." is unhelpful in preserving the character of London. The plan should reference examples of tall building developments in London which the Mayor genuinely believes make a positive contribution to the city. I do not believe that the Mayor will be able to point to more than one or two such examples. Generally tall buildings either ruin the skyline; have a devastating impact on conservation and heritage areas, destroy the character of London, sit very badly in their immediate environment, and provide nothing of community value. The burden of proof should be on the proposers of a tall building to show that the building makes a positive contribution to London's image, streetscape and skyline; and that it adds value to existing communities and to the city as a whole. It should not be encumbant on those who oppose the building to have to prove harm, which is by its nature a subjective value.

The argument constantly put forward for tall buildings is that London needs the accommodation which they provide. London does need many more residential units, but not urgently of the type provided by tall buildings. To say that the benefit of tall buildings is in helping to accommodate expected growth is to ignore the basic "cost-benefit" analysis which should be applied. Tall buildings generally provide few units of accommodation per floor, and the reduction in height to a sensible level will not reduce the number of residential units by a significant amount. On the other hand, the increase in height will in most cases have a very detrimental impact on the city as a whole. The benefit is vastly out-weighed by the cost, for all stakeholders other than the developer.

It is disproportionate and disingenuous to put the concept of tall buildings "supporting legibility across the city" at the beginning of the chapter on tall buildings. London does not need tall buildings to provide legibility. The negative impact of tall buildings on the skyline and in relation to heritage assets can not, and should not, be defended through this ridiculous assertion. This applies elsewhere in the draft plan where the concept of "way-finding" is referred to. We do not require tall buildings for way-finding and this should in no way be a reason for allowing their development. This is as obtuse a concept as referring to a building as "being a gateway to somewhere". Buildings are not gates. They do not stand on their own.

Tall building design should be of the "highest" quality and not simply of the "required" quality.

Policies such a C1.b are useless for their generality and for the ability of an articulate proposer to drive a carriage-and-horse through the intention of the policy. Tall buildings inevitably "reinforce spatial hierarchy". Anything can be justified by this proposed policy. The test should be whether the tall building provides a positive contribution to the local and greater area in which it sits. The proposer will need to show beyond doubt that the impact is positive.

The definition of what is considered a tall building should indeed be defined by local context, but should also make reference to the impact on other parts of the city from which the tall building can be seen. The skyline belongs to all of London, not just the immediate location of a tall building. The definition of what is tall should be informed by consultation with local communities and through a design review process.

The proposed "plan-led approach" to appropriate locations for tall buildings should take account of the alternatives to tall buildings in that location. While a tall building may bring some additional units of accommodation, the dis-benefits in terms of impact locally and further afield; on the skyline; on heritage assets and conservation areas; and on the general character of London must be taken into account. As above, the cost-benefit analysis must consider all the externalities arising from a tall building proposal.

If the London Plan is going to allow for tall buildings it is essential that it should require the proposers of a tall building to show beyond reasonable doubt that their tall building will make a "positive contribution" to the existing and emerging skyline and to the character of the local area and of London as a whole. The burden of proof should be very much on the proposer. They should be required to show why an alternative form, mid-rise for example, is not preferable. The arbiters should be informed by an independent, rigorous, expert design review system. This needs to be mandatory, and the panel needs to be consulted at various stages of the proposal. 3 D modelling and visualisation should also be mandatory. It is unacceptable in this day and age that this is not used in all planning applications, especially for tall buildings, to test the individual and cumulative impact of a proposed building on views, adjacencies, light and a myriad of other factors.

Page: [Policy HC1 Heritage conservation and growth](#)

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The policy should make it very clear that the impact of development on the setting of "heritage assets" must be considered both locally and far afield. This particularly realtes to tall buildings which may not have a negative impact on the immediate environment, but when seen from afar may be devastating.

Page: [Policy HC4 London View Management Framework](#)

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The protection of the River Thames should be more explicit, either in this part of the Plan or elsewhere. The river is being trashed. Any river ride will bear witness to the fact that we have been blind to the impact of development on this great asset of London. The river has been taken for granted, to the point where the great views of London and the pleasure given by the historic context around the river has been ruined in many places. This is not just a tragedy for Londoners, but for all the world who visit and who regard London as a city to admire and emulate. The river should be included in the View Management Framework. The River Thames needs urgent protection of its own. It is fragile and it is endangered. It is the Mayor's obligation to ensure that it is treated as London's most valuable natural asset.

Page: [Policy HC5 Supporting London's culture and creative industries](#)

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There needs to be a balance between competing uses of buildings, both existing and new. Culture and spaces for small businesses have suffered in the rush to solve the housing crisis. This is short-sighted. A city is a fragile ecology, and a focus on housing on its own, without places for people to work, make things, exhibit and have recreation will lead to a poorer city. Permitted Development should be fought wherever and however possible; and planning strategies should understand the need for non-residential uses, not only on ground floors of new residential developments (usually very poor space), but in buildings and groups of buildings as well.