

Ms barbara weiss comments

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I am resubmitting this document, originally submitted by the Skyline Campaign, which I run, as it contains many relevant points for Policy D8 that I would wish to repeat as part of the current consultation on the Draft London Plan. I highlight the most relevant ones.

Barbara Weiss

for the skyline Campaign

Response to draft City for All Londoners

16 December 2016

Thank you for the opportunity to comment on the City for All Londoners document.

The Skyline Campaign is an organisation set up in 2014 and supported by a wide

variety of professionals - and many ordinary Londoners - concerned by the sudden, unchecked, proliferation of tall buildings appearing across the capital, often poorly designed and in inappropriate locations. **The Campaign is not against towers per se, but believes they should only be permitted if of the highest architectural standards, and in locations where they make a demonstrably positive contribution.**

The Campaign's main aims so far have been to raise awareness of the recent tall building boom, and to fight for the introduction of new policy that will contribute to a raising of standards in terms of the planning, design and construction of towers.

The Skyline Campaign is consequently extremely keen to participate in this consultation and to bring to the table an analysis of the current predicament; conclusions arising from three years of intense discussions; its experience of supporting local groups, and its involvement in a multitude of high-profile planning applications.

1 Background

1.2 As you are aware, there is growing concern about the ever-increasing number of tall buildings in the pipeline for London, which are sprouting up in a

haphazard and opportunistic way, with little consideration for their impact on local communities, on the character of London, and on the skyline.

1.3 There were 436 buildings of 20 storeys or more in the pipeline in London as of March 2016ⁱ. At the time, 89 were under construction, 233 had approval but work was yet to start, and 114 were at the planning or pre-application stage.

The number in the pipeline had nearly doubled in just two years. No doubt these figures will have again significantly increased in the last nine months.

1.4 Whilst largely concentrated in central London (Tower Hamlets has the most, at 93), significant numbers of tall buildings are in the pipeline across the entire geographical reach of the capital: Greenwich has 67, Barnet has 23 and Croydon has 18.

1.5 This represents an explosion of tall buildings that will damage permanently the city's identity, its public spaces, protected views and skyline. Too many of these towers are of mediocre architectural quality and badly sited. Many show little consideration for scale and setting, little respect for the local community, make minimal contribution to public realm or street-level experience, and are

designed without concern for their cumulative effect and impact, both locally and on London, a unique world city. They do not provide housing that Londoners need or can afford. They are carbon intensive and inefficient resource users. Many are ticking time bombs, with substantial maintenance requirements that will not be met should the trend for luxury flats in the sky fall out of favour. Finally, their generic designs and universal materiality threaten London's specific, recognisable and beloved character and skyline.

1.6 London deserves better.

1.7 Your full review of the London Plan provides the opportunity to develop a set of policies on tall buildings that will ensure our capital city gets the highest quality development in the right places, and meeting the right needs. **We are pleased that the City for All Londoners document recognises that tall buildings are only appropriate where they meet strict criteria. We hope that this sentiment will be translated into new London Plan policy which establishes that any additional new towers, however well designed, should be the exception, not the rule.**

1.8 Our response includes a number of recommendations for policies in the next London Plan, including: shifting the burden of proof onto developers, to demonstrate how their proposal will have a positive impact on the community and on London; an improved consultation process that gives residents a realistic opportunity to block, or amend, inappropriate development; a requirement that developers consider alternative building configurations, to demonstrate that they could not achieve similar densities using mid-rise design; the use of independent design review panels; the use of a 3D model when considering tall buildings; stronger tests to ensure that the proposal is sustainable; and the strengthening and extending of the View Management Framework.

1.9 We also comment on existing policy, the role of viability and land values, and the potential for further, design-led master planning across the capital, including the identification of areas suitable for tall buildings.

2 Existing Policy

2.1 Our response focuses primarily on new policies within the next London Plan.

However, as this will not be adopted until 2019 at earliest, it is important that you use existing policy more effectively in the meantime.

2.2 The London Plan includes an existing policy on tall buildings (Policy 7.7 Local and Design of Tall Buildings), as well as a suite of other policies which are particularly relevant when considering applications for towers (Policy 7.4 Local Character, Policy 7.6 Architecture, Policies 7.11 and 7.12 on the London View Management Framework, Policies 3.5 and 3.6 on residential development, Policy 5.3 Sustainable Design and Construction, etc.).

2.3 We believe that if these policies were properly implemented, very few additional tall buildings would be given planning permission. However, hundreds of proposals received approval under your predecessor. This speaks to a failure to properly implement existing policies.

2.4 In other words, even without a change in policy, you could implement immediately a significant change in direction. We consequently ask that you use your existing planning powers to refuse applications that are not in conformity with the London Plan, including where they do not meet the criteria

established by Policy 7.7 parts C and Dii.

2.5 Current policy could produce different results purely by interpreting the “tests” in the manner that you express in the City for All Londoners, rather than wait until an amended London Plan is adopted. Existing policy provides the opportunity to give more weight to the impact on the community, streetscape and the skyline. The policy will still need updating with a wider set of tests, but you can start making decisions differently to your predecessor without much change in policy.

2.6 Such decisions would provide much-needed, clear political direction both to the Planning Decisions Unit in City Hall and to local planning authorities across London.

2.7 We also note that many of these policies were developed at a time when the majority of tall buildings coming forward were for commercial use. We believe that there must be a distinction made between commercial and residential proposals. Many of the existing housing and related policies, including on issues such as play-space, make proposals for tall buildings unacceptable in

planning terms.

3 Policy recommendations for next London Plan

3.1 Burden of proof

3.1.1 The current London Plan requires that proposed tall buildings “should not have an unacceptably harmful impact on their surroundings” (Policy 7.7). This places the burden of proof on the planning authority to identify harmful impacts, meaning the default position is that tall buildings pass the policy requirement unless a specific reason can be identified. We believe that this situation should be reversed: in future developers should have to prove that their proposal will have a positive impact on its surroundings.

3.1.2 We recommend that the next London Plan place the burden of proof on developers to demonstrate how their tall building will enhance London’s skyline, the local area, and - given their visibility - the city as a whole. Such a policy requirement would be in keeping with the approach laid out in City for all Londoners under which tall buildings will “only be permitted if they can add value to the existing community” and that they make a positive contribution to

the streetscape and the skyline, as well as their local impact at street level. For example, the document has an ambition to preserve the intrinsic character of historic London, including the diverse local characters of the many villages that have grown up to create modern London; the impact of a tall building, either within or visible from these areas, must be a factor. These considerations could all be applied to both new applications and to renewals. By giving more weight to these factors, applications for tall buildings will face a more thorough and meaningful assessment.

3.2 Genuine public consultation

3.2.1 Applications for tall buildings have often been approved despite intense opposition from local communities and concerned Londoners. Londoners indeed often feel that their views are ignored by developers and decisionmakers when tall buildings are proposed in their city, and that they have no recourse against outcomes they oppose. Earlier this year, Ipsos Mori polling found that nearly three-quarters of Londoners believe the public should be consulted more over the number of new tall buildings that are built.

3.2.2 There is clearly a need for greater public consultation when considering tall buildings. The public must feel that their views have been heard and appropriately taken into account.

3.2.3 We therefore suggest you consider Londoners' and local residents' views when determining whether a proposed tall building "add[s] value to the existing community". Where objections raise legitimate planning grounds, there must be strong planning reasons to ignore these and grant approval.

3.2.4 We also recommend that you lobby Government for a change in planning guidance to create a "community veto" on tall buildings. You will be aware that this "community veto" already exists in relation to wind farms by virtue of the Written Ministerial Statement of 18 June 2015 given by the Secretary of State for Communities and Local Government. This gives local people 'the final say on wind farm applications'.

3.3 Alternative designs

3.3.1 We agree with you that "higher density does not necessarily mean high rise." Study after study has demonstrated that often mid-rise designs can provide

similar and even higher levels of densities than those achieved in tall buildingsiv. This is because mid-rise designs can more intensively use the plot at the ground level and do not require the large unit sizes that tall buildings need, to be viable. Tall buildings often fail to optimise the development potential of sites, in that they often produce fewer, larger units; these, but also the smaller units, are invariably unaffordable to Londoners. Indeed, the drive to go tall is not fuelled by an ambition to achieve more housing, but by the developer's incentive to maximise profit.

3.3.2 We recommend the new London Plan require that any proposal for tall buildings also consider other buildings configurations. Before a final scheme is put forward, the developer must demonstrate that it has considered alternative designs, and that it cannot develop a scheme to provide new homes at similar densities in any other configuration than a tall building.

3.4 Independent professional advice

3.4.1 We recommend that all proposals for tall buildings be subject to independent design reviews, at several key stages of planning and design, including at preapplication

stage. Design reviews can evaluate the quality of proposals.

Panels can review the design and provide an assessment of its strengths and weaknesses as well as identify next steps that should be taken to maximise the benefits that can be achieved. Design review panels could also be used to determine whether there are suitable low- or mid-rise alternative configurations.

3.4.2 Statutory consultees, such as Historic England and Royal Parks and many others also provide important advice that must be heeded. Your predecessor failed to take note of this advice, ignoring warnings from Historic England about the irreparable damage to London's historic character caused by a number of the proposals he waved through. We suggest that responses from statutory consultees be given much stronger consideration when determining applications for tall buildings.

3.5 3D modelling

3.5.1 We recommend the compulsory use for all large scale developments of a fully interactive 3D computer model of London's emerging skyline; it is a very useful

tool to realistically evaluate benefits and harm caused by tall buildings and large developments at a local and city-wide scale. 3D models of the whole of London already exist, such as that from GIA, and the GLA should take advantage of this technology.

3.5.2 This model would allow developers, planners, and the public to see what is proposed across the capital and get a sense not only of the individual, but also of the cumulative effect of tower clusters and large developments on the city. It would also allow them to be considered at different angles, and from different distances, scientifically exposing conflicts of views, impact on amenities, and potential for environmental harm such as shadowing.

3.5.3 As a relevant example, had a 3D model been used in assessing the Stratford tower by Manhattan Lofts, it would have been immediately obvious that the Richmond Park view of St Paul's would be seriously compromised by its presence.

3.6 Sustainability

3.6.1 There is a growing evidence base demonstrating that tall buildings are less

sustainable than those which provide similar quantum of development in other configurations.

3.6.2 Energy use is higher in tall buildings. A survey into residential towers found that electricity use is twice as high, likely due to the buildings' greater exposure and therefore increased solar gain, as well as other conditions prevalent at higher altitudes, including more wind and colder temperatures.

3.6.3 Tall buildings are often less sustainable also in other ways. The taller the building, the higher the amount of embodied energy require per useable square metre because low-carbon materials such as timber are often not viable. Tall buildings suffer more highly from heat losses for the same amount of insulation as lower buildings because of the higher wind speeds. They can create poor micro-climates at ground level.

3.6.4 Tall buildings must not be given an easy pass on sustainability. They must be subject to the highest standards of scrutiny, particularly in relation to their longevity and need for maintenance. Environmental Impact Assessments must realistically demonstrate the impacts of tall buildings. Applications must

model environmental impacts using dynamic models to understand overheating, vertical sky views, daylight and sunlight/shadow impacts, energy demands etc. A post-occupancy evaluation should also be required as part of the off-site carbon payment; where targets are not met, the developer should have to pay compensation. Buildings should have to prominently display energy certificates in the same way as household appliances.

3.6.5 The social sustainability of tall buildings must also be carefully considered during the planning process. Towers built in disadvantaged areas are prone to be divisive, and known for not contributing meaningfully to their local economy. Buildings of such a scale and complexity invariably take a long time to be built and occupy, often blighting their neighbourhoods for many years in the interim.

3.7 Strengthen, enhance and extend the View Management Framework

3.7.1 The London Plan and the attendant London View Management Framework protect a number of important historic views across the capital, from parks and other public spaces that take in important buildings, to urban landscapes that help define London. The intrusion of tall buildings into these views can have a

significant adverse impact on the character and quality of those views, and we therefore call on you to strengthen and enhance the View Management Framework, and extend it to include other well-loved views that are relevant in the 21st century. A major omission is views along and across the Thames especially upstream of Lambeth Bridge.

3.7.2 The updated Framework should be evidentiary; views should be protected for their architectural, cultural, or historic significance, and not determined by politics. It should consider new views, and also reconsider earlier versions of the Frameworks to see how existing views have been eroded. It should reflect the topography of London, which is at risk of being lost. Finally, consideration should be given to a Framework that focuses not on particular points but rather on unfolding views, which are revealed as one moves through the cityscape. This work will be greatly facilitated by using the virtual 3D model mentioned previously.

4 The impact of viability

4.1 Rising land values are putting pressure on developers and architects to

produce tall buildings. A pattern has emerged in which developers overpay on a site then attempt to recoup their costs with over-intense developments, often in the form of towers with luxury flats. Viability considerations have become a get-out clause that developers have used to force through proposals that do not conform to London Plan policy.

4.2 We need to break out of the situation in which the price of land determines everything. Expectations have been set by precedent in which overdevelopment has been allowed because of viability considerations – this precedent should be reversed by refusing applications which do not conform with policy. We welcome the recent guidance on viability provided in the draft Affordable Housing and Viability Supplementary Planning Guidance, and hope that this is enforced through the use of planning powers to refuse inappropriate applications. This will change expectations and drive down land values. Downward pressure on land values would free up architects to design better buildings.

5 Design-led Master planning

5.1 Many of the negative consequences of tall buildings on London's communities and its skylines are due to the unplanned and uncoordinated way in which these structures have appeared. Where tall buildings are in the right location they can make a positive contribution to the city. One way to guarantee that tall buildings are well-located and work well with their surroundings is to produce sensitive to context, design-led master-plans.

5.2 Design-led Master-planning exercises look at a site in the context of the wider area to determine what type of development is suitable in terms of use, placemaking, and other important features. They provide an opportunity for planners and developers to take an aspirational rather than constraint-led look at potential schemes, identifying urban design opportunities that will generate unique and distinctive places and neighbourhoods. Master planning offers the opportunity for an approach that can be centred on specific human needs and human experiences, starting with the specific existing context.

5.3 The assessment undertaken for the GLDP, LPAC and later recommended by former English Heritage/CABE was for each borough to identify areas where

tall buildings would be inappropriate, were sensitive to tall buildings or where they might be appropriate. London Plan Policy 7.7e proposes this. We recommend that the GLA undertake a review with the boroughs to identify where high-rise buildings are appropriate.

6 Conclusion

6.1 The Skyline Commission is not against tall buildings. We acknowledge that, as you write in the document, “tall buildings [will continue] to play a role in the future of London”. We want to make sure that they play the right role. Tall buildings are mostly appropriate for commercial uses, not residential. Where they are proposed as residential development, approval should be the exception, rather than the rule.

6.2 The policy proposals suggested above will help to ensure that only well designed tall buildings that make a positive contribution to the local community and to London as a whole, without negative impacts on the environment, will be secured.

6.3 But policy can only guide decisions. We therefore stress the importance of

setting the tone by using your planning powers to refuse inappropriate tall buildings which do not meet the policy tests set out in the current London Plan.

6.4 Thank you once again for the opportunity to comment on this draft document.

We look forward to continuing to take a positive and proactive approach to working with you and your planning teams to ensure that London gets the type of development it deserves.

Contact:

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i New London Architecture. London Tall Buildings Survey (Annual Update). March 2016. Available from http://www.newlondonarchitecture.org/docs/1_nla_ir_tall_buildings_single-1.pdf.

ii London Plan Policy 7.7 states that tall buildings should:

a generally be limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport

b only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building

c 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;

d individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London

e incorporate the highest standards of architecture and materials, including sustainable design and construction practices

f have ground floor activities that provide a positive relationship to the surrounding streets

g contribute to improving the permeability of the site and wider area, where possible

h incorporate publicly accessible areas on the upper floors, where appropriate

i make a significant contribution to local regeneration.

and that tall buildings should not:

a affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise, reflected glare, aviation, navigation and telecommunication interference

b impact on local or strategic views adversely.

iii Ipsos Mori. "Tall buildings in London. March 2016 survey. Topline Results". Question TW010, p. 4. Available from

<https://www.ipsos-mori.com/Assets/Docs/Polls/skyline-campaign-tall-buildings-2016-topline.pdf>.

iv Cite Barbara's work here

Page: [Policy SD6 Town centres](#)

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1. London's many and very varied town centres must not continue to be viewed as windfall opportunities/ cash cows waiting to be exploited in order to replenish the coffers of too many cash-strapped Boroughs. These communities have their own identities, their own history and character and if they are going to be regenerated and upgraded in order to accommodate some of the badly needed housing that London needs to build, then this should be done with the utmost sensitivity to the existing character. Local design-led plans must be produced before planning is granted to anything more than infill sites, and local residents opinions and priorities need to be observed. These decisions will have consequences for decades to come, and cannot be taken lightly. The choice of materials, volume, street level treatment are all extremely important and should be reviewed by Design Review Panels and codified in local Design Guides.
2. Particular care should be given to surrounding Conservation Areas and the impact that new development will have on them - particularly views, adjacencies, over-shadowing, loss of light etc

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1. D1 A (7)that are appropriately sized to reflect population densities. New developments must not be allowed if there are not sufficient or adequately sized open green areas in the immediate vicinity.
2. D1A (11) **The form and layout of a place must be based on the understanding of the heritage of the area, including its historic grain and archaeological interest**

3. D1 B (1) building and spaces that are of a scale, **HEIGHT**, appearance....and **CONSERVES EXISTING HISTORIC ENVIRONMENT**
4. D1B (2) use of attractive, robust, **DURABLE** materials, which weather and mature well and are appropriate for the character of the locality.
5. 3.1.2 **To deliver a public realm that is high quality, and appropriate to the character of a particular area, more generous floor-to-ceiling heights at ground floor level must be encouraged if to be found in neighbouring typologies.**
6. 3.1.4 Green open spaces must be provided that are adequate and appropriate to the density of local population. Conversely, the size and density of all new developments must be determined following careful consideration of the overall provision of a local green areas.
7. D2 A ...which strengthens what is valued in a place, **AND WHAT INSTEAD COULD UNDERMINE IT OR HARM ITS CHARACTER**
8. D2 A 1a) **LOCAL CHARACTER**
9. D2 A 3 **PREVAILING MATERIALS AND QUALITY OF PUBLIC REALM**
10. D2 A 7 a) and heritage assets....**VIEWS**
11. D2 B appropriate and **SYMPATHETIC TO CONTEXT**
12. D2 C **THE USE OF 3D MODELS SHOULD BE A COMPULSORY TOOL FOR ALL PLANNING APPLICATIONS RELATING TO TALL BUILDINGS, AS WELL AS TO BUILDINGS TALLER THAN THEIR IMMEDIATE NEIGHBOURS, TO ALLOW FOR A FULL EVALUATION OF IMPACT AT CLOSE QUARTERS, AS WELL AS FROM A DISTANCE.**
13. D2 D **PRESCRIPTIVE DESIGN CODES** should be devised and agreed, in order to ensure that materials appropriate to context are used and detailing is generally of high standard
14. D2 F All London Boroughs must have access to highly qualified and experienced **Design Review Panels**, whose opinion will be sought and taken into account as part of the planning process for all medium to large developments. Large developments and any above 30 m should be made to submit their design developments to several design reviews at specific agreed stages during the course of the various design stages.
15. D2 H Planning permission should never be granted on an outline basis only.
16. 3.2.1 TOO FREQUENT USE OF EXPRESSION " efficient use of land". Replace with "**appropriate use of land**"
17. 3.2.7 All Boroughs must engage with professional Design Review Panels. It is not acceptable that some Boroughs do not have this level of design scrutiny available (Westminster?). Decisions must be monitored.

TALL BUILDINGS

1. D8 Tall Buildings - Opening paragraph: It is totally **ridiculous** that tall buildings should be justified for their 'supporting legibility across the city to enable people to navigate to key destinations' : in the generation of Google maps, Waze, Tom-tom s etc. this is a completely pathetic excuse for what amounts to self-serving developer and Borough greed and financial gain, at the expense of London as a whole. The consequences of allowing inferior, badly designed towers to be built are now available to be seen by all. **We need to stop the trend. Tall Buildings should be the exception, not the rule.**
2. It is furthermore now well-known that tall buildings can only be 'sustainably developed' at vast expense to the developer, who must be prepared to pay for very expensive and high quality materials and systems - this rarely/never happens in the UK, particularly not in residential towers built to sell. The majority of tall buildings are built cheaply and badly, and will become, in the long term, the slums of the future. The planning system needs to wake up to the fact that the Boroughs will be left with a large number of obsolete eyesores that will be in need of huge sums of money to be upgraded and repaired. This is the reality. Our top sustainability academics are warning us of the un-sustainable nature of Tall buildings, the extra energy that they require to be run, the embodied carbon that they require to be built. The Mayor must introduce a far higher sustainability bar when scrutinising planning applications for this type of building, with the results being openly discussed by specialists prior to planning consent being awarded to the developer.
3. Tall Buildings must be of the **HIGHEST design quality** (omit 'required' design quality) "**and make a positive contribution to the skyline, townscape and scale shaping the character of the area. Developers must assume the burden of proof in demonstrating how their proposal will make a positive impact and add value to existing communities and to the city as a whole**"
4. D8 A What parameters are going to be used, and by whom, to define what a Tall Building is in each Borough? This should not be left to the Boroughs themselves - as they are very much interested parties, as they stand to benefit from building tall.
5. D8B should be modified to read: " Boroughs should identify on maps in their Local Plans all appropriate heights for new buildings, and specifically identify locations where Tall Buildings might be appropriate, sensitive or inappropriate, taking into account:Decisions about local heights should be open to consultation by a) local residents, who must have a say in how their neighbourhoods are transformed and b) statutory consultees such as Historic England , Royal Parks etc, as tall buildings affect the wider city and not just local areas
6. D8B 2) Developers must prove that they have tried to deliver different configurations of buildings before resorting seeking consent for a Tall Building, and should qualify that Londoners will be substantially benefitting from the houses being built Regeneration and homes can be delivered in many different ways. It must also be stated what type of housing is being proposed, and for what type of end user. London should not be trashed purely for the benefit of investors.
7. D8B 3) Public transport provision must be examined carefully by specialists if population numbers are being greatly increased in a specific area - the influx of many more passengers often results in the local system becoming for everyone.
8. D8 C 1 a) including **the impact of the building on the local community and on the character of the area**

9. The impact must be particularly assessed from conservation areas, parks and all sorts of precious locations around London, to avoid 'bombing' of treasured views by incongruous out-of-scale buildings, as has been happening across the city (eg Walkie Talkie vs Tower Bridge, or St George's Tower vs Pimlico streets). Views from windows above street level must also be protected. Conservation officers are becoming much stricter about what is acceptable to be seen on roofs etc from upper level windows - this should be extended to views of Tall Buildings.
10. D8 C b) "aid legibility": pathetic and ridiculous, as above
11. D8 C c) agree materials should be of exemplary standard - but London is morphing into a glass and steel 'generic' city; masonry/solid towers contribute a greater feeling of permanence within London's historic environment. We need guidelines on desirable materials and codes on recommended longevity. At the moment towers are now built to last much longer than lower buildings and they will be very difficult to demolish and rebuild.
12. D8 C d) Any Tall Buildings that are judged to cause any level of Harm **should be refused planning consent**. There is no justification at all for allowing this typology to continue to undermine London's character and its historic assets. Tall Buildings should **'positively contribute', or not at all**.
13. D8 C e) **Tall buildings should not be allowed within the settings of World Heritage Sites, as they inevitably undermine the settings and their views.**
14. D8 C f) The River Thames has already become a canyon and is becoming worse day by day, as we can now see the consequences of the disastrous planning decisions taken in past years. No new towers should be allowed along the River or within a good margin of it. As suggested by Graham Morrison:

The Mayor and the London Plan need to first appropriately reflect the significance of the River Thames to London's enduring character and attraction. The importance of the central section of the river cannot be overstated. It is one of the most significant spaces in one of the most important cities in the world. There is a need to define the significance of the River Thames and to develop policies which are appropriate to its management. Secondly, a statutory custodian of this stretch of the River Thames must be agreed. This custodian should be an independent body that can act as a statutory consultee on all planning applications close to the Thames. This custodian would test applications against a set of principles which, might include "the closer to the river, the more one has to contribute to it". Establishing a statutory custodian could be achieved in one of two ways: 1. Protecting the central section as a listed structure - Technically it would be possible to list this section of the river. Much of the river bank is man-made and therefore listable as a built structure. This approach would give Historic England the role of statutory custodian. 2. Establishing a new independent organisation, separate to Glad, TfL and the Port of London Authority, with the statutory powers to manage change along the riverside. Its remit would include coordinating the views of all the political authorities, conserving the river's history and ensuring that new development understood, addressed and reinforced the character of the river rather than simply exploiting it. Such an authority would fill a yawning gap in the armory of London's conservation.

15. D8 C 2 d) it must be demonstrated that the area local to a new Tall Building has adequate infrastructure to accommodate a substantial increase in local population: public green spaces, schools, surgeries, transport etc.
16. D8 C 3 a) it is well known that Tall Buildings do affect wind, daylight, sunlight etc. Planning applications must be scrutinised very carefully and the bar must be placed very high in order to ensure that the local environment is not affected, and that neighbours are not made to suffer due to the new construction, as has been happening all too frequently in recent years. **Compulsory guidelines on minimum distances between Tall Buildings and their neighbours should be introduced.**
17. D8 D Tall Buildings should be assessed for their impact on surrounding and long distance impact both individually and as part of any cluster they might belong to. Boroughs must ensure that these checks include any other towers that are known to be in the planning pipeline.

18. 3.8.1 Disagree on need for Tall Buildings to help navigating...Agree need for 'exemplary architectural quality', but this needs to be agreed by Design Review Panels and general public. At the moment these very important decisions are often taken in an un-democratic fashion local people and statutory consultees having almost no powers to veto.
19. 3.8.3 It must become compulsory to use 3D model, for developers, Boroughs, GLA, statutory consultees etc. This technology is now widely available and reasonably priced. The cost should fall on the developer.
20. 3.8.6 Great care is needed to minimise the impact of a Tall Building at Ground Level. Too often one is faced with loading bays or other unacceptable street level elevations. NY-style plinths are a useful architectural device to bring towers down to street level in a considered manner.

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7. D2 D **PRESCRIPTIVE DESIGN CODES** should be devised and agreed, in order to ensure that materials appropriate to context are used and detailing is generally of high standard
8. D2 F All London Boroughs must have access to highly qualified and experienced **Design Review Panels**, whose opinion will be sought and taken into account as part of the planning process for all medium to large developments. Large developments and any above 30 m should be made to submit their design developments to several design reviews at specific agreed stages during the course of the various design stages.
9. D2 H Planning permission should never be granted on an outline basis only.
10. 3.2.1 TOO FREQUENT USE OF EXPRESSION " efficient use of land". Replace with "***appropriate use of land***"
11. 3.2.7 All Boroughs must engage with professional Design Review Panels. It is not acceptable that some Boroughs do not have this level of design scrutiny available (Westminster?). Decisions must be monitored.

Page: [Policy D8 Tall buildings](#)

Section: N/A

TALL BUILDINGS

1. D8 Tall Buildings - Opening paragraph: It is totally **ridiculous** that tall buildings should be justified for their 'supporting legibility across the city to enable people to navigate to key destinations' : in the generation of Google maps, Waze, Tom-tom s etc. this is a completely pathetic excuse for what amounts to self-serving developer and Borough greed and financial gain, at the expense of London as a whole. The consequences of allowing inferior, badly designed towers to be built are now available to be seen by all. **We need to stop the trend. Tall Buildings should be the exception, not the rule.**

2. It is furthermore now well-known that tall buildings can only be 'sustainably developed' at vast expense to the developer, who must be prepared to pay for very expensive and high quality materials and systems - this rarely/never happens in the UK, particularly not in residential towers built to sell. The majority of tall buildings are built cheaply and badly, and will become, in the long term, the slums of the future. The planning system needs to wake up to the fact that the Boroughs will be left with a large number of obsolete eyesores that will be in need of huge sums of money to be upgraded and repaired. This is the reality. Our top sustainability academics are warning us of the un-sustainable nature of Tall buildings, the extra energy that they require to be run, the embodied carbon that they require to be built. The Mayor must introduce a far higher sustainability bar when scrutinising planning applications for this type of building, with the results being openly discussed by specialists prior to planning consent being awarded to the developer.
3. Tall Buildings must be of the **HIGHEST design quality** (omit 'required' design quality) **"and make a positive contribution to the skyline, townscape and scale shaping the character of the area. Developers must assume the burden of proof in demonstrating how their proposal will make a positive impact and add value to existing communities and to the city as a whole"**
4. D8 A What parameters are going to be used, and by whom, to define what a Tall Building is in each Borough? This should not be left to the Boroughs themselves - as they are very much interested parties, as they stand to benefit from building tall.
5. D8B should be modified to read: " Boroughs should identify on maps in their Local Plans all appropriate heights for new buildings, and specifically identify locations where Tall Buildings might be appropriate, sensitive or inappropriate, taking into account:Decisions about local heights should be open to consultation by a) local residents, who must have a say in how their neighbourhoods are transformed and b) statutory consultees such as Historic England , Royal Parks etc, as tall buildings affect the wider city and not just local areas
6. D8B 2) Developers must prove that they have tried to deliver different configurations of buildings before resorting seeking consent for a Tall Building, and should qualify that Londoners will be substantially benefitting from the houses being built Regeneration and homes can be delivered in many different ways. It must also be stated what type of housing is being proposed, and for what type of end user. London should not be trashed purely for the benefit of investors.
7. D8B 3) Public transport provision must be examined carefully by specialists if population numbers are being greatly increased in a specific area - the influx of many more passengers often results in the local system becoming for everyone.
8. D8 C 1 a) including **the impact of the building on the local community and on the character of the area**
9. The impact must be particularly assessed from conservation areas, parks and all sorts of precious locations around London, to avoid 'bombing' of treasured views by incongruous out-of-scale buildings, as has been happening across the city (eg Walkie Talkie vs Tower Bridge, or St George's Tower vs Pimlico streets). Views from windows above street level must also be protected. Conservation officers are becoming much stricter about what is acceptable to be seen on roofs etc from upper level windows - this should be extended to views of Tall Buildings.

10. D8 C b) "aid legibility": pathetic and ridiculous, as above
11. D8 C c) agree materials should be of exemplary standard - but London is morphing into a glass and steel 'generic' city; masonry/solid towers contribute a greater feeling of permanence within London's historic environment. We need guidelines on desirable materials and codes on recommended longevity. At the moment towers are now built to last much longer than lower buildings and they will be very difficult to demolish and rebuild.
12. D8 C d) Any Tall Buildings that are judged to cause any level of Harm **should be refused planning consent**. There is no justification at all for allowing this typology to continue to undermine London's character and its historic assets. Tall Buildings should **'positively contribute', or not at all**.
13. D8 C e) **Tall buildings should not be allowed within the settings of World Heritage Sites, as they inevitably undermine the settings and their views.**
14. D8 C f) The River Thames has already become a canyon and is becoming worse day by day, as we can now see the consequences of the disastrous planning decisions taken in past years. No new towers should be allowed along the River or within a good margin of it. As suggested by Graham Morrison:

The Mayor and the London Plan need to first appropriately reflect the significance of the River Thames to London's enduring character and attraction. The importance of the central section of the river cannot be overstated. It is one of the most significant spaces in one of the most important cities in the world. There is a need to define the significance of the River Thames and to develop policies which are appropriate to its management. Secondly, a statutory custodian of this stretch of the River Thames must be agreed. This custodian should be an independent body that can act as a statutory consultee on all planning applications close to the Thames. This custodian would test applications against a set of principles which, might include "the closer to the river, the more one has to contribute to it". Establishing a statutory custodian could be achieved in one of two ways:1. Protecting the central section as a listed structure - Technically it would be possible to list this section of the river. Much of the river bank is man-made and therefore listable as a built structure. This approach would give Historic England the role of statutory custodian.2. Establishing a new independent organisation, separate to Glad, TfL and the Port of London Authority, with the statutory powers to manage change along the riverside. Its remit would include coordinating the views of all the political authorities, conserving the river's history and ensuring that new development understood, addressed and reinforced the character of the river rather than simply exploiting it. Such an authority would fill a yawning gap in the armory of London's conservation.

15. D8 C 2 d) it must be demonstrated that the area local to a new Tall Building has adequate infrastructure to accommodate a substantial increase in local population: public green spaces, schools, surgeries, transport etc.

16. D8 C 3 a) it is well known that Tall Buildings do affect wind, daylight, sunlight etc. Planning applications must be scrutinised very carefully and the bar must be placed very high in order to ensure that the local environment is not affected, and that neighbours are not made to suffer due to the new construction, as has been happening all too frequently in recent years. **Compulsory guidelines on minimum distances between Tall Buildings and their neighbours should be introduced.**
17. D8 D Tall Buildings should be assessed for their impact on surrounding and long distance impact both individually and as part of any cluster they might belong to. Boroughs must ensure that these checks include any other towers that are known to be in the planning pipeline.
18. 3.8.1 Disagree on need for Tall Buildings to help navigating...Agree need for 'exemplary architectural quality', but this needs to be agreed by Design Review Panels and general public. At the moment these very important decisions are often taken in an un-democratic fashion local people and statutory consultees having almost no powers to veto.
19. 3.8.3 It must become compulsory to use 3D model, for developers, Boroughs, GLA, statutory consultees etc. This technology is now widely available and reasonably priced. The cost should fall on the developer.
20. 3.8.6 Great care is needed to minimise the impact of a Tall Building at Ground Level. Too often one is faced with loading bays or other unacceptable street level elevations. NY-style plinths are a useful architectural device to bring towers down to street level in a considered manner.

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Thank you for the opportunity to comment on the City for All Londoners document.

The Skyline Campaign is an organisation set up in 2014 and supported by a wide variety of professionals - and many ordinary Londoners - concerned by the sudden, unchecked, proliferation of tall buildings appearing across the capital, often poorly designed and in inappropriate locations. **The Campaign is not against towers per se,**

but believes they should only be permitted if of the highest architectural standards, and in locations where they make a demonstrably positive contribution.

The Campaign's main aims so far have been to raise awareness of the recent tall building boom, and to fight for the introduction of new policy that will contribute to a raising of standards in terms of the planning, design and construction of towers.

The Skyline Campaign is consequently extremely keen to participate in this consultation and to bring to the table an analysis of the current predicament; conclusions arising from three years of intense discussions; its experience of supporting local groups, and its involvement in a multitude of high-profile planning applications.

1 Background

1.2 As you are aware, there is growing concern about the ever-increasing number of tall buildings in the pipeline for London, which are sprouting up in a haphazard and opportunistic way, with little consideration for their impact on local communities, on the character of London, and on the skyline.

1.3 There were 436 buildings of 20 storeys or more in the pipeline in London as of March 2016ⁱ. At the time, 89 were under construction, 233 had approval but

work was yet to start, and 114 were at the planning or pre-application stage.

The number in the pipeline had nearly doubled in just two years. No doubt these figures will have again significantly increased in the last nine months.

1.4 Whilst largely concentrated in central London (Tower Hamlets has the most, at 93), significant numbers of tall buildings are in the pipeline across the entire geographical reach of the capital: Greenwich has 67, Barnet has 23 and Croydon has 18.

1.5 This represents an explosion of tall buildings that will damage permanently the city's identity, its public spaces, protected views and skyline. Too many of these towers are of mediocre architectural quality and badly sited. Many show little consideration for scale and setting, little respect for the local community, make minimal contribution to public realm or street-level experience, and are designed without concern for their cumulative effect and impact, both locally and on London, a unique world city. They do not provide housing that Londoners need or can afford. They are carbon intensive and inefficient resource users. Many are ticking time bombs, with substantial maintenance requirements that will not be met should the trend for luxury flats in the sky fall

out of favour. Finally, their generic designs and universal materiality threaten London's specific, recognisable and beloved character and skyline.

1.6 London deserves better.

1.7 Your full review of the London Plan provides the opportunity to develop a set of policies on tall buildings that will ensure our capital city gets the highest quality development in the right places, and meeting the right needs. **We are pleased that the City for All Londoners document recognises that tall buildings are only appropriate where they meet strict criteria. We hope that this sentiment will be translated into new London Plan policy which establishes that any additional new towers, however well designed, should be the exception, not the rule.**

1.8 Our response includes a number of recommendations for policies in the next London Plan, including: shifting the burden of proof onto developers, to demonstrate how their proposal will have a positive impact on the community and on London; an improved consultation process that gives residents a realistic opportunity to block, or amend, inappropriate development; a requirement that developers consider alternative building configurations, to

demonstrate that they could not achieve similar densities using mid-rise design; the use of independent design review panels; the use of a 3D model when considering tall buildings; stronger tests to ensure that the proposal is sustainable; and the strengthening and extending of the View Management Framework.

1.9 We also comment on existing policy, the role of viability and land values, and the potential for further, design-led master planning across the capital, including the identification of areas suitable for tall buildings.

2 Existing Policy

2.1 Our response focuses primarily on new policies within the next London Plan. However, as this will not be adopted until 2019 at earliest, it is important that you use existing policy more effectively in the meantime.

2.2 The London Plan includes an existing policy on tall buildings (Policy 7.7 Local and Design of Tall Buildings), as well as a suite of other policies which are particularly relevant when considering applications for towers (Policy 7.4 Local Character, Policy 7.6 Architecture, Policies 7.11 and 7.12 on the London View Management Framework, Policies 3.5 and 3.6 on residential development,

Policy 5.3 Sustainable Design and Construction, etc.).

2.3 We believe that if these policies were properly implemented, very few additional tall buildings would be given planning permission. However, hundreds of proposals received approval under your predecessor. This speaks to a failure to properly implement existing policies.

2.4 In other words, even without a change in policy, you could implement immediately a significant change in direction. We consequently ask that you use your existing planning powers to refuse applications that are not in conformity with the London Plan, including where they do not meet the criteria established by Policy 7.7 parts C and Dii.

2.5 Current policy could produce different results purely by interpreting the “tests” in the manner that you express in the City for All Londoners, rather than wait until an amended London Plan is adopted. Existing policy provides the opportunity to give more weight to the impact on the community, streetscape and the skyline. The policy will still need updating with a wider set of tests, but you can start making decisions differently to your predecessor without much change in policy.

2.6 Such decisions would provide much-needed, clear political direction both to the Planning Decisions Unit in City Hall and to local planning authorities across London.

2.7 We also note that many of these policies were developed at a time when the majority of tall buildings coming forward were for commercial use. We believe that there must be a distinction made between commercial and residential proposals. Many of the existing housing and related policies, including on issues such as play-space, make proposals for tall buildings unacceptable in planning terms.

3 Policy recommendations for next London Plan

3.1 Burden of proof

3.1.1 The current London Plan requires that proposed tall buildings “should not have an unacceptably harmful impact on their surroundings” (Policy 7.7). This places the burden of proof on the planning authority to identify harmful impacts, meaning the default position is that tall buildings pass the policy requirement unless a specific reason can be identified. We believe that this situation should be reversed: in future developers should have to prove that

their proposal will have a positive impact on its surroundings.

3.1.2 We recommend that the next London Plan place the burden of proof on developers to demonstrate how their tall building will enhance London's skyline, the local area, and - given their visibility - the city as a whole. Such a policy requirement would be in keeping with the approach laid out in City for all Londoners under which tall buildings will "only be permitted if they can add value to the existing community" and that they make a positive contribution to the streetscape and the skyline, as well as their local impact at street level. For example, the document has an ambition to preserve the intrinsic character of historic London, including the diverse local characters of the many villages that have grown up to create modern London; the impact of a tall building, either within or visible from these areas, must be a factor. These considerations could all be applied to both new applications and to renewals. By giving more weight to these factors, applications for tall buildings will face a more thorough and meaningful assessment.

3.2 Genuine public consultation

3.2.1 Applications for tall buildings have often been approved despite intense

opposition from local communities and concerned Londoners. Londoners indeed often feel that their views are ignored by developers and decisionmakers when tall buildings are proposed in their city, and that they have no recourse against outcomes they oppose. Earlier this year, Ipsos Mori polling found that nearly three-quarters of Londoners believe the public should be consulted more over the number of new tall buildings that are builtiii.

3.2.2 There is clearly a need for greater public consultation when considering tall buildings. The public must feel that their views have been heard and appropriately taken into account.

3.2.3 We therefore suggest you consider Londoners' and local residents' views when determining whether a proposed tall building "add[s] value to the existing community". Where objections raise legitimate planning grounds, there must be strong planning reasons to ignore these and grant approval.

3.2.4 We also recommend that you lobby Government for a change in planning guidance to create a "community veto" on tall buildings. You will be aware that this "community veto" already exists in relation to wind farms by virtue of the Written Ministerial Statement of 18 June 2015 given by the Secretary of State

for Communities and Local Government. This gives local people ‘the final say on wind farm applications’.

3.3 Alternative designs

3.3.1 We agree with you that “higher density does not necessarily mean high rise.”

Study after study has demonstrated that often mid-rise designs can provide similar and even higher levels of densities than those achieved in tall buildingsiv. This is because mid-rise designs can more intensively use the plot at the ground level and do not require the large unit sizes that tall buildings need, to be viable. Tall buildings often fail to optimise the development potential of sites, in that they often produce fewer, larger units; these, but also the smaller units, are invariably unaffordable to Londoners. Indeed, the drive to go tall is not fuelled by an ambition to achieve more housing, but by the developer’s incentive to maximise profit.

3.3.2 We recommend the new London Plan require that any proposal for tall buildings also consider other buildings configurations. Before a final scheme is put forward, the developer must demonstrate that it has considered alternative designs, and that it cannot develop a scheme to provide new homes at similar

densities in any other configuration than a tall building.

3.4 Independent professional advice

3.4.1 We recommend that all proposals for tall buildings be subject to independent design reviews, at several key stages of planning and design, including at preapplication stage. Design reviews can evaluate the quality of proposals.

Panels can review the design and provide an assessment of its strengths and weaknesses as well as identify next steps that should be taken to maximise the benefits that can be achieved. Design review panels could also be used to determine whether there are suitable low- or mid-rise alternative configurations.

3.4.2 Statutory consultees, such as Historic England and Royal Parks and many others also provide important advice that must be heeded. Your predecessor failed to take note of this advice, ignoring warnings from Historic England about the irreparable damage to London's historic character caused by a number of the proposals he waved through. We suggest that responses from statutory consultees be given much stronger consideration when determining applications for tall buildings.

3.5 3D modelling

3.5.1 We recommend the compulsory use for all large scale developments of a fully interactive 3D computer model of London's emerging skyline; it is a very useful tool to realistically evaluate benefits and harm caused by tall buildings and large developments at a local and city-wide scale. 3D models of the whole of London already exist, such as that from GIA, and the GLA should take advantage of this technology.

3.5.2 This model would allow developers, planners, and the public to see what is proposed across the capital and get a sense not only of the individual, but also of the cumulative effect of tower clusters and large developments on the city. It would also allow them to be considered at different angles, and from different distances, scientifically exposing conflicts of views, impact on amenities, and potential for environmental harm such as shadowing.

3.5.3 As a relevant example, had a 3D model been used in assessing the Stratford tower by Manhattan Lofts, it would have been immediately obvious that the Richmond Park view of St Paul's would be seriously compromised by its presence.

3.6 Sustainability

3.6.1 There is a growing evidence base demonstrating that tall buildings are less sustainable than those which provide similar quantum of development in other configurations.

3.6.2 Energy use is higher in tall buildings. A survey into residential towers found that electricity use is twice as high, likely due to the buildings' greater exposure and therefore increased solar gain, as well as other conditions prevalent at higher altitudes, including more wind and colder temperatures.

3.6.3 Tall buildings are often less sustainable also in other ways. The taller the building, the higher the amount of embodied energy require per useable square metre because low-carbon materials such as timber are often not viable. Tall buildings suffer more highly from heat losses for the same amount of insulation as lower buildings because of the higher wind speeds. They can create poor micro-climates at ground level.

3.6.4 Tall buildings must not be given an easy pass on sustainability. They must be subject to the highest standards of scrutiny, particularly in relation to their longevity and need for maintenance. Environmental Impact Assessments

must realistically demonstrate the impacts of tall buildings. Applications must model environmental impacts using dynamic models to understand overheating, vertical sky views, daylight and sunlight/shadow impacts, energy demands etc. A post-occupancy evaluation should also be required as part of the off-site carbon payment; where targets are not met, the developer should have to pay compensation. Buildings should have to prominently display energy certificates in the same way as household appliances.

3.6.5 The social sustainability of tall buildings must also be carefully considered during the planning process. Towers built in disadvantaged areas are prone to be divisive, and known for not contributing meaningfully to their local economy. Buildings of such a scale and complexity invariably take a long time to be built and occupy, often blighting their neighbourhoods for many years in the interim.

3.7 Strengthen, enhance and extend the View Management Framework

3.7.1 The London Plan and the attendant London View Management Framework protect a number of important historic views across the capital, from parks and other public spaces that take in important buildings, to urban landscapes that help define London. The intrusion of tall buildings into these views can have a

significant adverse impact on the character and quality of those views, and we therefore call on you to strengthen and enhance the View Management Framework, and extend it to include other well-loved views that are relevant in the 21st century. A major omission is views along and across the Thames especially upstream of Lambeth Bridge.

3.7.2 The updated Framework should be evidentiary; views should be protected for their architectural, cultural, or historic significance, and not determined by politics. It should consider new views, and also reconsider earlier versions of the Frameworks to see how existing views have been eroded. It should reflect the topography of London, which is at risk of being lost. Finally, consideration should be given to a Framework that focuses not on particular points but rather on unfolding views, which are revealed as one moves through the cityscape. This work will be greatly facilitated by using the virtual 3D model mentioned previously.

4 The impact of viability

4.1 Rising land values are putting pressure on developers and architects to produce tall buildings. A pattern has emerged in which developers overpay on

a site then attempt to recoup their costs with over-intense developments, often in the form of towers with luxury flats. Viability considerations have become a get-out clause that developers have used to force through proposals that do not conform to London Plan policy.

4.2 We need to break out of the situation in which the price of land determines everything. Expectations have been set by precedent in which overdevelopment has been allowed because of viability considerations – this precedent should be reversed by refusing applications which do not conform with policy. We welcome the recent guidance on viability provided in the draft Affordable Housing and Viability Supplementary Planning Guidance, and hope that this is enforced through the use of planning powers to refuse inappropriate applications. This will change expectations and drive down land values. Downward pressure on land values would free up architects to design better buildings.

5 Design-led Master planning

5.1 Many of the negative consequences of tall buildings on London's communities and its skylines are due to the unplanned and uncoordinated way in which

these structures have appeared. Where tall buildings are in the right location they can make a positive contribution to the city. One way to guarantee that tall buildings are well-located and work well with their surroundings is to produce sensitive to context, design-led master-plans.

5.2 Design-led Master-planning exercises look at a site in the context of the wider area to determine what type of development is suitable in terms of use, placemaking, and other important features. They provide an opportunity for planners and developers to take an aspirational rather than constraint-led look at potential schemes, identifying urban design opportunities that will generate unique and distinctive places and neighbourhoods. Master planning offers the opportunity for an approach that can be centred on specific human needs and human experiences, starting with the specific existing context.

5.3 The assessment undertaken for the GLDP, LPAC and later recommended by former English Heritage/CABE was for each borough to identify areas where tall buildings would be inappropriate, were sensitive to tall buildings or where they might be appropriate. London Plan Policy 7.7e proposes this. We recommend that the GLA undertake a review with the boroughs to identify

where high-rise buildings are appropriate.

6 Conclusion

6.1 The Skyline Commission is not against tall buildings. We acknowledge that, as you write in the document, “tall buildings [will continue] to play a role in the future of London”. We want to make sure that they play the right role. Tall buildings are mostly appropriate for commercial uses, not residential. Where they are proposed as residential development, approval should be the exception, rather than the rule.

6.2 The policy proposals suggested above will help to ensure that only well designed tall buildings that make a positive contribution to the local community and to London as a whole, without negative impacts on the environment, will be secured.

6.3 But policy can only guide decisions. We therefore stress the importance of setting the tone by using your planning powers to refuse inappropriate tall buildings which do not meet the policy tests set out in the current London Plan.

6.4 Thank you once again for the opportunity to comment on this draft document.

We look forward to continuing to take a positive and proactive approach to

working with you and your planning teams to ensure that London gets the type of development it deserves.

Contact:

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i New London Architecture. London Tall Buildings Survey (Annual Update). March 2016. Available from http://www.newlondonarchitecture.org/docs/1_nla_ir_tall_buildings_single-1.pdf.

ii London Plan Policy 7.7 states that tall buildings should:

a generally be limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres that have good access to public transport

b only be considered in areas whose character would not be affected adversely by the scale, mass or bulk of a tall or large building

c 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;

d individually or as a group, improve the legibility of an area, by emphasising a point of civic or visual significance where appropriate, and enhance the skyline and image of London

e incorporate the highest standards of architecture and materials, including sustainable design and

construction practices

f have ground floor activities that provide a positive relationship to the surrounding streets

g contribute to improving the permeability of the site and wider area, where possible

h incorporate publicly accessible areas on the upper floors, where appropriate

i make a significant contribution to local regeneration.

and that tall buildings should not:

a affect their surroundings adversely in terms of microclimate, wind turbulence, overshadowing, noise,

reflected glare, aviation, navigation and telecommunication interference

b impact on local or strategic views adversely.

iii Ipsos Mori. "Tall buildings in London. March 2016 survey. Topline Results". Question TW010, p. 4. Available from

<https://www.ipsos-mori.com/Assets/Docs/Polls/skyline-campaign-tall-buildings-2016-topline.pdf>.

iv Cite Barbara's work here