



**Andrew Boff AM**

**Chair of the Planning and Regeneration Committee**

Sadiq Khan  
Mayor of London  
(Sent by email)

16 March 2021

**Re: Supporting a separate SPG on tall buildings**

Dear Sadiq,

I am writing to you in my position as Chair on behalf of the London Assembly's cross-party Planning & Regeneration Committee with regard to the London Plan Tall Building Policy. We set out some of our concerns below that the London-wide policy framework still contains significant gaps. Our recommendations are intended to help improve guidance which will in turn safeguard London's skyline.

The Committee and the wider Assembly have had longstanding concerns that the London Plan does not provide adequate guidance to ensure new tall buildings are appropriate to their location and surroundings.<sup>1</sup> Whilst the Committee continues to call for clearer policy distinction to be drawn between tall buildings for residential use and those for commercial and mixed-use, it also does not believe tall buildings to be the answer to London's housing needs. Our concerns relate to the impact on neighbourhoods and, more widely, London's character. Tall buildings can also be costly to build, operate and maintain, are not best suited for family housing (which is much needed in London), and can have significant environmental impacts.<sup>2</sup> At the October 2020 Planning and Regeneration Committee, Professor Philip Steadman of University College London said that:

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<sup>1</sup> [Letter to the Mayor, April 2020](#)

<sup>2</sup> [Planning & Regeneration Committee response to the Good Quality Homes consultation](#), 14 January 2021

*“It is certainly true that there is a very large increase in embodied energy in tall office buildings. If you go from low-rise to 30 or 40 storeys you are doubling the amount of energy that goes into construction. [...] The reasons are in the stresses on the steel frame and the foundations. [...] We did a piece of work a couple years ago, on tall office buildings, mostly in London, 600 of them of different heights. To cut a long story short, if you go from six storeys to 20 storeys, energy intensity per square metre is doubled.”*

At the Examination in Public (EiP), the London Assembly put forward that, even after 20 years, London has a tall building policy that is still generic and does not contain anything specific to residential high-rise buildings<sup>3</sup>, despite the increasing number of tall buildings. Most recently, the Committee responded to the consultation on the Good Quality Homes for All Londoners, London Plan Guidance. Along with a range of technical recommendations, the Committee reiterated its call for a separate Supplementary Planning Guidance (SPG) or set of SPGs for residential tall buildings.<sup>4</sup>

On 3 March 2021, the London Assembly Planning & Regeneration Committee met for an End-of-term meeting to take stock of the extent to which your policies on tall buildings and tall building design have been achieved and whether there are any lessons to be learnt from the COVID-19 pandemic. In the meeting, we heard from:

- Jules Pipe CBE, Deputy Mayor for Planning, Regeneration and Skills
- Elliot Kemp, Principal Strategic Planner, GLA
- Nicholas Boys Smith, Founding Director, Create Streets

During the discussion, many of our existing concerns about the liveability of tall buildings were reiterated. We heard from Nicholas Boys Smith about research from Create Streets, looking at the relationships between where people live and how connected they feel with their neighbours during lockdown:

*“...we all know and it will be uncontroversial that greenery is a good thing for our wellbeing as humans, but the key thing is not the quantum of greenery in a larger area. It is the ease of access to greenery. It is how close it is, particularly for children for obvious reasons. Our research found that access to front gardens and private back gardens was very clearly associated with more neighbourly interactions compared to environments with no outdoor space immediately contingent on the home. Those with gardens had much more of an increase in talking to other residents than those without.”<sup>5</sup>*

We are also concerned, from the discussions on the 3 March, about the application of the policies for adequate play space in tall building developments. While we recognise the achievements of the London Plan in terms of developing policies for play and recreation for children and young people, we urge you to continue to prioritise the importance of easily accessible and usable play and activity space in practical application. We heard about ‘exceptions’ where play space is only provided ‘nearby’ rather than on site. As the Deputy Mayor for Planning, Regeneration and Skills stated:

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<sup>3</sup> Planning and Regeneration Committee Transcript October 2020

<sup>4</sup> [Planning & Regeneration Committee response to the Good Quality Homes consultation](#), 14 January 2021

<sup>5</sup> Transcript 3 March 2021

*“Land values and all the other factors that we could discuss way beyond the remit of this particular topic that drive the typology that ends up on that site do not lend themselves to a courtyard because there is no courtyard at all because of the size of the plot. We end up with a typology that does not have immediate play space, let alone overlooked. It really is the geography of the site that will determine the delivery of our policy. It will be one of those things that is often in planning where it will be sought and demanded if it can be delivered, but sometimes it is simply not practical.”<sup>6</sup>*

While we recognise that this situation is not the norm, we believe it should not be the case in any situation. We believe that unless there is green space or a park very close by, it should not be allowed.

The Committee has also previously expressed concern about the capacity of local authority planning teams to undertake the increased design scrutiny that is required by the ‘design-led approach’. The capacity and expertise of these teams is vital and could have further knock-on effects; boroughs will need to ensure that their design teams have the necessary knowledge to undertake this technical work and make decisions that will affect London’s skyline for years to come. These decisions should not be taken lightly. The New London Architecture (NLA) Tall Buildings Survey 2020, found that there are currently 525 tall buildings in the pipeline in various stages of planning and development. There were 60 tall building completions in 2019. 88 percent of the 60 buildings were residential builds.<sup>7</sup> A separate residential tall buildings SPG would go some way in assisting boroughs with these additional burdens.<sup>8</sup>

The Committee’s position is supported by consultation with a range of expert stakeholders. For example, at the Planning and Regeneration Committee in October 2020, Jo McCafferty (Director, Levitt Bernstein) said that:

*“There is a case to be made that there should be a special residential SPG for tall buildings. That should be set out very carefully with regard to buildings over 10 storeys and then a certain threshold of, for example, 20 storeys because they all have different needs and design requirements”*

We appreciate it is too early to determine the definite impact of COVID-19 on existing tall building policies. However, the Committee feels that, in a post-COVID-19 world, such policies should consider how people and families have had to interact within restricted spaces in high-rise densities, often without adequate outdoor or garden space. The Committee discussed this with guests at our October meeting and it was raised that several studies have already begun to highlight the disadvantage felt by families living in tall buildings, particularly throughout the pandemic.<sup>9</sup> Further, a survey carried out by the Housing Committee and Planning & Regeneration Committee in summer 2020 also found that access to private outdoor space, proximity of public green space, and a more spacious home had become more important because of the first national lockdown. 36 per cent of

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<sup>6</sup> Transcript 3 March 2021

<sup>7</sup> Tall Buildings Survey, NLA, 2020

<sup>8</sup> Transcript 3 March 2021

<sup>9</sup> Planning and Regeneration Committee Transcript 21 October 2020

respondents did not feel their home environment was suitable for homeworking, and 40 per cent felt that their home was not suitable for shielding from COVID-19.

**Recommendation**

The Mayor should develop further guidance in the form of separate Supplementary Planning Guidance for residential tall buildings, which should include consideration of dwelling typologies, size mix, space standards, tenure mix, indoor and outdoor amenity space, as well as the environmental impacts.

The Committee would welcome a response by 30 June 2021. Please address your response to Stephanie Griffiths, Senior Policy Adviser, at [Stephanie.Griffiths@london.gov.uk](mailto:Stephanie.Griffiths@london.gov.uk).

Yours sincerely,

A handwritten signature in dark ink, appearing to read 'Andrew Boff', written in a cursive style.

**Andrew Boff AM**

**Chair of the Planning and Regeneration Committee**