



## Examination in Public of the draft London Plan: Written submission by CPRE London (1142) to the EIP Panel, December 2018

### *DESIGN - TALL BUILDINGS*

*Matter 41: Would Policy D8 provide a justified and effective strategic framework for the development of tall buildings? In particular: a) Would the local definition of what is considered a 'tall building' provide an effective strategic framework to guide the location of tall building development? b) Where there is no local definition of what is considered a 'tall building', would the definition at paragraph 3.8.2 be justified and would it be effective? c) Would Policy D8, generally provide an effective framework to guide the location of tall building development, taking account of its wider surroundings and any cumulative effect? d) Would it provide an effective strategic framework for the assessment of the impact of tall building development? e) Overall, would Policy D8 provide an effective and justified strategic framework for the preparation of local plans, neighbourhood plans and development management in relation to this matter?*

1. CPRE London believes there is a pressing need for an effective strategic framework for the development of tall buildings across London. There has been too much indiscriminate and uncoordinated tall building construction in recent years which risks irrevocable damage to the character of London's neighbourhoods and skyline. It is particularly important that tall buildings are subject to a more effective planning regime in future given the emphasis in the draft Plan on housing intensification and higher density development in suitable locations.

2. We broadly welcome the minor suggested changes (MSC 3.110) to Policy D8 emphasising that tall buildings should 'only be developed in sustainable locations identified in Development Plans'. We also welcome proposed changes (MSC 3.120 and 3.121) to paragraphs 3.8.1 and 3.8.2 which we believe should help better manage the impact of tall buildings. We believe, however, that the need for a 'a strategic overview of tall building locations' to be prepared by the Mayor and Boroughs, referred to in paragraph 3.8.3, should be explicitly referenced in Policy D8. Without such an overview, supported in policy, there is a significant risk of continued uncoordinated development and a lack of effective control over cumulative impacts.

3. We are also concerned that Policy D8 makes no reference to the need to minimise light pollution from tall buildings. We believe that the potential impact on levels of light pollution

should be a factor in determining suitable strategic locations for tall buildings and that reference to the need to minimise light pollution should be added to Policy D8C g).

4. CPRE London welcomes measures to incorporate publicly-accessible spaces into tall buildings. We support the minor suggested change (MSC 3.118) indicating that these should be free to enter and to provide better views they should generally be at the top of such buildings. We believe that a stronger requirement to provide such space is needed and to ensure that no unreasonable restrictions are placed on public access so that a new generation of tall buildings brings genuine public benefit.

CPRE London

December, 2018