

London Plan Examination in Public – Written Statement

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Matter 41

Would Policy D8 provide a justified and effective strategic framework for the development of tall buildings?

The London Assembly does not consider that Policy D8 provides a justified and effective strategic framework for the development of tall buildings and would like to see better guidance in the form of an SPG on residential Tall Buildings which deals with the location of tall buildings, alternative configurations, housing needs and the control of design approaches. At present the criteria in PolicyD8 focus solely on physical, functional and environmental impacts. Social and community impacts are totally ignored; the functional impacts fail to distinguish between residential and commercial and mixed use buildings and the environmental impacts are inadequately dealt with.

As New London Architecture has noted, in total of 510 tall buildings (defined as buildings over 20 storeys) are currently in the pipeline (up from 236 in 2014 and 455 in 2017) with the potential to deliver an estimated 106,000 new homes.ⁱ The Assembly is concerned that the cumulative impact on the London skyline and local communities has not been fully assessed and believes the Mayor should take the opportunity of this full review of the London Plan to ensure policy on tall buildings works for the community through the provision of stronger strategic guidance.

The matter of Tall Buildings was examined in detail at the London Assembly Planning Committee meeting on 27 June 2018 when a number of experts and representatives from the London Boroughs were invited to attend. The evidence presented at that meeting has informed the London Assembly's response to Matter 41.ⁱⁱ

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?

The Planning Committee and Assembly have consistently recommended that Mayoral planning policy is strengthened to restrict the location of tall buildings and to improve their design. As such, the Assembly welcomes the requirement set out in Policy D8 which requires

local definitions of what tall means and the locations in each borough in which tall buildings would be acceptable. However, it wishes to see the policy go further.

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?

The Assembly considers that there is a requirement for clearer strategic policy guidance on the location and design of tall buildings. It is of the view that the current London Plan policy 7.7 provides a more effective strategic policy framework in that the Mayor will play a strategic role in working with the boroughs to identify suitable locations for tall buildings. Policy D8 omits this requirement.

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?

The Assembly is concerned about the lack of a strategic approach to the location of tall buildings and the cumulative impact of tall buildings on the London skyline and heritage and local communities and neighbourhoods. There is a need for greater consistency between GG2, D6 and D8 as to the definition of “sustainable locations” for tall buildings, with much greater emphasis on public transport accessibility and capacity, social infrastructure and local character and context.

Questions remain as to the sustainability of tall buildings particularly in relation to their residential as opposed to commercial useⁱⁱⁱ. The London Plan policies on tall buildings which continued until now virtually unchanged were not intended to apply to residential buildings^{iv}. A clear policy distinction needs to be drawn between tall buildings for residential use and tall buildings for commercial and mixed use, particularly given that approximately 80% of tall buildings with planning consent are residential. The use needs to be considered in determining the design and configuration of a tall building and the Assembly has requested that alternative configurations for high density development should be considered.

The Assembly does not believe that tall residential buildings are the answer to London’s housing needs and should not be encouraged outside of a few designated and carefully managed areas of London. High densities can be achieved by approaches that are more suitable for families, more in keeping with London’s traditional form and less intrusive on the skyline. This is examined in the Planning Committee’s January 2016 report ‘Up or Out: A false choice’^v and set out in a unanimous motion^{vi} and letter to the previous Mayor in March 2015.

d) Would it provide an effective strategic framework for the assessment of the impact of tall building development?

The Assembly does not consider that Policy D8 would provide an effective strategic framework for the assessment of the impact of tall building development and needs to be substantially strengthened in this respect. The assessment of environmental impacts are not well defined.

There is a growing evidence base which demonstrates that tall buildings are less sustainable than those which provide similar quantum of development in other configurations. Energy use is higher in tall buildings, with electricity use twice as high due to the buildings' increased solar gain, as well as other conditions prevalent at higher altitudes, including more wind and colder temperatures^{vii}. The taller the building, the higher the amount of embodied energy required per useable square metre as low-carbon materials such as timber are not viable. Tall buildings suffer also more from heat losses for the same amount of insulation as lower buildings because of the higher wind speeds.

The policy must demand more evidence from applications about their environmental and social impacts. They must be subject to the highest standards of scrutiny, particularly in relation to longevity and need for maintenance. Environmental and social impacts must be fully assessed. Applications must model environmental impacts using dynamic models to understand overheating, vertical sky views, daylight and sunlight/shadow impacts, energy demands etc. Important views should be much better protected for their architectural, cultural, or historic significance.

A clause should be added to Clause D8-C.1 Visual Impacts to require appropriate long term mechanisms to be established and demonstrated to ensure that tall buildings will be well maintained.

A sub-clause should be added to D8-C.3 to ensure that buildings should not have a larger whole life carbon balance per useable square metre than a lower building would have. A further sub-clause should be added to ensure that noise created by air ...should not detract....for open spaces...and balconies and other amenity space.

Evidence has shown that tall buildings result in large monocultures of a single tenure or particular demographic and that the creation of mixed sustainable communities is not achievable using a predominance of tall buildings. High management costs and service charges often preclude affordable tenures and well designed family homes are harder to achieve as they are remote from shared amenity space which is essential for family living and child development. For this reason, the Assembly has consistently argued that larger flats should be on lower storeys. Furthermore, it is difficult to achieve a mix of unit sizes in tall buildings where all floor plates conform to the same configuration, typically leading to a larger proportion of small units and single aspect homes.^{viii} An assessment of these social impacts is critical and this should be acknowledged in Policy D8.

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?

The Assembly believes a more effective strategic framework for the preparation of local plans and neighbourhood plans is required and Policy D8 should be amended to:

- Establish a 'skyline commission' to advise on the design impact of tall buildings;
- Adopt a more detailed and rigorous masterplanning process in relation to tall buildings, especially within Opportunity Areas;

- Extend the environmental and functional impacts to be assessed and include a requirement to assess the social and community impacts of tall buildings;
- Encourage a mix of unit sizes and tenures in tall residential buildings including a requirement for larger family units on the lower 6-8 floors where access can be provided to communal play space;
- Provide a commitment to the development of a 3D computer model of London's emerging skyline- and ensure it is made freely available to boroughs to ensure a consistent approach;
- Adopt a requirement for all developers with proposals for tall buildings to consider other building configurations- specifically that 'alternative methods of achieving the same goals and densities should be demonstrated, shown and considered as a prior condition' so that tall buildings are not immediately seen as the answer.

Policy D8 must relate more specifically to meeting London's diverse housing needs particularly in respect of family and affordable housing and creating inclusive communities in accordance with the Good Growth objectives through the provision of a mix of unit sizes and amenity space.

The Mayor should as a matter of urgency produce further guidance in the form of an SPG on Tall Building residential development. This should include consideration of dwelling typologies, space standards, tenure mix and amenity space.

ⁱ New London Architecture, 'Tall Buildings in London: NLA Survey Results' March 2018

ⁱⁱ London Assembly Planning Committee, 27 June 2018

ⁱⁱⁱ London Assembly Planning Committee, 27 June 2018

^{iv} The London Plan, February 2004, Policy 4B.8

^v London Assembly Planning Committee, '[Up or Out: A false choice: Options for London's growth](#)', January 2016, page 18

^{vi} London Assembly Motion, 5 November 2014, <https://www.london.gov.uk/motions/tall-buildings>

^{vii} Skyline Campaign Response to Matter M41, January 2019

^{viii} Minutes of meeting of London Assembly Planning Committee 18 July 2018

<https://www.london.gov.uk/moderngov/ieListDocuments.aspx?CId=258&MIId=6396&Ver=4>