

GLA - PLANNING FOR LONDON: Tall Buildings

JUST SPACE RESPONSE 31/12/23

Just Space is a Londonwide network of community groups focused on planning issues. The response below is drawn from a variety of comments made, and is not exhaustive or definitive. A more comprehensive set of proposals is set out in our [Community-Led Plan](#) and [Recovery Plan](#)

At the online event we were struck by a number of things: the confusing presentation from Paul Monaghan, followed by quite a muddled discussion focused on an anti (by residents) or pro approach to tall buildings.

Although Paul is the Mayor's design adviser, his practice is one of London's most prolific architects or masterplanners advocating tall buildings. Paul very unhelpfully muddled up tall buildings and mid-rise buildings (8-storey mansion blocks), describing an image of central Paris' 6-8 storey blocks as "tall buildings everywhere"! He talked about both interchangeably, didn't distinguish between them and presented taller as merely an extension of 8-storey, rather than a fundamentally different form.

He unhelpfully muddled up the architect's brochure advertising a proposal (such as the masterplan for Canada Water, which he praised as "areas of huge regeneration") with an analysis of their impact once they had been built and occupied. He gave away the problem by stating "If you had a large tract of vacant land and you could reinvent it" then tall buildings would be part of the mix... The only trouble being that there are no such tracts of vacant land in London! The challenge is that there are hundreds of often hidden communities, sometimes clinging on, sometimes thriving. Paul repeatedly claimed "with tall buildings you can create much more affordable housing" without any caveats: our experience is the opposite - the taller and more expensive the building the less viable is it for affordable housing. The most grotesque calumny related to the Elephant & Castle, where 2,000 families and 300 BAME SMEs were catastrophically cast to the winds in the face of huge opposition, yet he claimed that this was based on the "co-production principle", involving a huge amount of consultation at the beginning of the process to get people on board. In fact he referred to consultation in 2000-2003 by the Elephant Links SRB, whose consultation was ignored and then superseded by a plan for wholesale demolition not originally envisaged, not approved for another decade, and still currently being constructed, although Paul was quite willing to claim that the new development was "incredibly popular"! We could go on. We found the whole presentation muddled, unbalanced and unhelpful.

For too long the debate about tall buildings has been left to run without clarity, as if it's a personal aesthetic and design choice, rather than an issue of economic and environmental impact which can and should be measured and analysed.

Just Space is concerned about two aspects in particular:

- There is growing evidence that over a certain height, tall buildings become radically more inefficient in the amount of carbon generated in their construction and in their use, and this inefficiency increases exponentially the higher the building goes. A team at

the Bartlett has been tracking data on this, and Just Space is currently undertaking a project to bring that evidence together

- The underlying problem driving the housing crisis (including unaffordable private rents and house prices increasingly beyond the reach of the vast majority of families) is the remorseless increase in land values. For over 30 years - since 1991 - land values have increased far above inflation, and, as one of the safest guaranteed returns, have sucked in UK and global investment capital, fuelling this remorseless increase. The hundreds of tall buildings constructed and the 600 in the development pipeline have dramatically led the way on this, through the very high densities achieved on the immediate plot of land, and through the hope value which accrues to sites within the area where heights and densities could be increased

Definition

The definition of a tall building was muddled in Monaghan introduction and the GLA line of questions ("For clarity, tall buildings must be at least 18m from ground level to the floor of the uppermost level, usually interpreted as 6 storeys. However, local planning authorities define tall buildings locally").

The current London Plan allows boroughs to define tall buildings. For Lambeth tall buildings are defined as above 45m north of the south circular; for some boroughs tall buildings begin at 18m, the point at which some critical regulations kick in; for the Mayor the default is 30m. These heights are radically different, and the economic and environmental impact of 18m (6 storey) development and over 45m (15+ storeys) development is significantly different.

1. In terms of building heights, what should London's 'shape' be in the future? What should the skyline of Greater London look like?

This is an odd question. It has been the understood vernacular for centuries that the tallest buildings in towns and cities are located at the most significant civic spots. Transport nodes are significant civic spots for Londoners dominated by the (in)ability to get around. The unpatterned location of tall buildings since the 1960s has always been a confusing visual oddity. This has been exacerbated to a very great degree in the past 20 years by the preponderance of tall buildings across all parts of London, many away from significant civic spots. The skyline is now often a confusing jumble, rather an expression of civic significance. At many points a row of tall buildings - along the river or along transport lines - have become a visual and social barrier, a wall of development.

For example, the 1950s office slabs along Lambeth's Albert Embankment and the railway viaduct were denounced (in Lambeth's local plan, UDP 1998) as a barrier blocking the residential hinterland (of almost entirely social housing) accessing the amenity of the river - many residents were unaware of how close to the river they were. The replacement of these slabs since 2010 with a row of significantly higher tall buildings of almost exclusively high-value, have proved an even more resistant wall of development blocking access to the amenity of the river, despite the gaps between the tall buildings, and despite the fact that the homes are largely unoccupied. They are a series of tall gated developments which take away any sense of the Albert Embankment being a public civic space.

The need to identify locations for tall buildings in local plans has been a good step forward, provided that the local authority has undertaken the necessary studies (many have not done so, e.g. Ealing), or is determined to achieve inward investment in their borough through a

proliferation of tall buildings. But the LP doesn't give this policy teeth: it simply allows (and therein encourages) tall building proposals for locations not identified as suitable for tall buildings and simply assesses such proposals against the same criteria in LP Policy D9 which is applied to proposals for locations identified as suitable for tall buildings!

The focus on high quality design has failed to ensure successful filtering e.g. 72 Upper Ground, towers at Woolwich, Ealing

2. Is there a greater scope for mid-rise development (5 - 10 storeys) in London – over and above what we currently do?

Yes - but is mid-rise defined? It's not simply a matter of height, but the proportions of the building - if it's longer than taller, with several entrances at ground, it is not a 'tall building', (albeit if it is over 30m or so it could be considered tall). High-rise doesn't always mean high density (nor is it the only way of achieving high density), as can be seen from areas such as parts of Kensington or St John's Wood dominated by mansion blocks. For many parts of inner London, or close to town centres, 'mid-rise' may involve a gentle but significant increase in density, but would have a more proportionate impact on land values. They are also likely to generate less carbon in their construction and use. With several entrances (which also meets the second stairwell requirements), often clustered around a courtyard, they are a far more socially interactive form of development than tall buildings.

Mid-rise buildings can be developed using CLT rather than steel and concrete, thereby sequestering carbon rather than emitting it.

3. What role should strategic and local views have on London's future skyline?

The list of strategic views hasn't changed since the 1990s, when 108 views proposed by LPAC were reduced to around 10 by ministerial fiat. The skyline has altered considerably since then by the plethora of tall buildings. The logic of what constitutes a strategic view and why it requires protection needs revisiting. Clusters of tall buildings in the City, Canary Wharf and numerous OAs now dominate views from all over the hilly parts of South London, for example, which are often public open space, and the curation of these views is becoming increasingly urgent.

A problem for 'strategic London' is that planning decisions are largely taken locally, where chauvinist local decision-makers frequently fail to give the LVMF sufficient weight. A good example of this is along the river, where boroughs meet: on the Lambeth/ Westminster boundary WCC have pointed to LVMF protected views which Lambeth has downplayed, with the result that there has been more call-ins by the Sec of State along this stretch than anywhere else in London.

The LVMF's guidance has also proved insufficiently clear at the resultant public inquiries, although it is taken very seriously by Inspectors, but most decisions are taken locally in a more cavalier way. Much of the guidance requires tweaking or more comprehensive revision.

In its very prominence the LVMF undermines the need to protect local views, which have become increasingly important as heights have increased everywhere. Once frequent glimpses of St Paul's or Westminster have become blocked and are increasingly rare. For

most Londoners for most of the time only local views are available; boroughs need to produce equivalent guidance to the LVMF for the local views in their area.

Despite some protections in the LVMF, the banks of the Thames have been frequently wrecked by overbearing tall buildings which block access to the river from the hinterland, either visually, or physically, or socially, with often stretches of the riverwalk being technically available for public access but clearly privately managed and hostile to many social uses. It is shocking that, aside from Battersea Park, the only significant stretch of river east of Putney Bridge available for real public amenity is the South Bank stretch from Lambeth Bridge to Cannon St bridge.

4. What role should tall buildings play in London's future?

Tall buildings have a seriously detrimental impact environmentally and on spiralling land values. The promise of tall buildings can often hold development back. Given the risks at planning stage, they are far more difficult to develop. Their construction cannot be phased, and therefore neither can their finances or risk. The result is that tall buildings permissions frequently take much longer to implement and build out. The result is that such proposals frequently fall outside development cycles and development doesn't actually happen, with the result that sites can lay vacant for decades, while speculative proposals continue to raise the land value and thence the book value. In Waterloo there are four such sites:

- Royal St sites, some of which have lain vacant since the war, with tall buildings permissions granted in 2008 and 2023
- Doon St site similarly, with a 2008 permission implemented but not built out
- Elizabeth House has had four permissions for tall buildings since 1996, but none have been built out
- 18 Blackfriars has been vacant since Sainsbury's vacated in 2000, with the site changing hands each time a tall building approval is achieved (2008, 2013, 2018), with the new owners proposing something even taller, with the value of the site rising from £38m in [2003](#) to £235m in [2019](#)

5. What role should the London Plan play in managing tall building development?

The London Plan is the appropriate level to call a moratorium on further permissions for tall buildings, with perhaps exceptions in the City. This would help to damp down speculation on the remorseless rise in land values, and force landowners and developers to concentrate on developing what London needs, including mid-rise housing. The example of the inappropriate Hondo tower proposal in Brixton, now withdrawn following intervention of the Mayor, illustrates why the power of local authorities to identify locations for tall buildings should revert back to the Mayor/LP, and should only be applied to exceptional sites. In order to stop speculation, the LP should make clear that proposals outside locations identified for tall buildings will be refused.

The London Plan should end the muddle of what constitutes a tall building by defining it clearly in the LP as 30m, as adopted in previous iterations of the LP. Lambeth's approach - allowing buildings up to 45m north of the South Circular to not be defined as tall buildings and thereby avoiding the tests set out in Policy D9 - is a clear example why the local approach fails.

It is appropriate that the tests for tall buildings in Policy D9 are set out in the London Plan rather than left to boroughs to establish in their local plans.

6. In addition to the impacts listed in Policy D9 part C, are there other assessment criteria that should be considered for tall building developments?

Policy D9 needs to include a test regarding the quantum of carbon emissions per m² of GIA across the whole life cycle, with a clear cut-off of acceptability set around the average for other high-density development such as mid-rise/mansion blocks.