

ORGANISATION	LONDON FIRST
ID	1588
MATTER	M41 TALL BUILDINGS

M41. 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?

1. London First agrees with the premise that there should not be a London-wide definition for a ‘tall building’, expressed as metres or storeys, embedded in policy. This is because tall buildings are accepted as being buildings which are substantially taller than their surroundings and the baseline will vary between and within different parts of London.
2. It is helpful that there is some guidance on height thresholds provided in the supporting text for Policy D8 at paragraph 3.8.2, which states:

“Where there is no local definition, the policy applies to buildings over 25m in height in the Thames Policy Area, and over 30m in height elsewhere in London.”

3. This guidance will provide boroughs with a starting point against which to assess their existing local context, help manage expectations, and discourage boroughs from setting unnecessarily conservative thresholds for their areas. However, it is disappointing that the GLA’s minor suggested changes have resulted in the deletion of the reference in paragraph 3.8.2 to a tall building in the City of London being more than 150 metres in height. This reference should be reinstated. Its deletion is not conducive to delivering the Good Growth strategy, in particular GG2 and GG5.
4. It is therefore submitted that paragraph 3.8.2 should be amended as follows:

3.8.2 *Tall buildings are generally those that are substantially taller than their surroundings and cause a significant change to the skyline. Boroughs should define what is a 'tall building' for specific localities. In large areas of extensive change, such as Opportunity Areas, the threshold for what constitutes a tall building should relate to the evolving (not just the existing) context. This policy applies to tall buildings as defined by the borough. Where there is no local definition, the policy applies to buildings over 25m in height in the Thames Policy Area, and over 30m in height elsewhere in London. In the City of London and other parts of the CAZ defined in Local Plans, tall buildings will be more appropriately defined as buildings over 150m in height.*

5. Most significantly, and despite the content in paragraph 3.8.2 discussed above, London First believes that the crucial reference to tall buildings being substantially taller than their surroundings should be embedded within policy at D8A. This is justifiably a strategic policy matter for a Spatial Development Strategy, as tall buildings will have an important role to play in assisting the Plan to meet its ambitious growth targets. D8A should therefore be amended as follows:

A *Tall buildings are generally those that are substantially taller than their surroundings and cause a significant change to the skyline. Based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London.*

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?

1. As stated above, where there is not yet a local definition in place, the guidance provided at paragraph 3.8.2 is helpful to a certain extent. As supporting text to D8A, it provides a starting point to help guide boroughs in developing their Local Plan policies and discourage them from setting unnecessarily conservative thresholds for their areas.
2. However, in order to ensure effective delivery of the Good Growth strategy, in particular GG2 and GG5, it is recommended that the changes set out in (4) and (5) above under question (a) are made to paragraph 3.8.2 and D8A. Firstly, paragraph 3.8.2 should acknowledge that a tall building in the City of London and some other parts of the CAZ may be more appropriately defined as a building exceeding 150 metres in height and, secondly, D8A should include the reference to tall buildings being substantially taller than their surroundings so that it is embedded within policy.

3. It should be noted that the insertion made at paragraph 3.8.2A as part of the GLA's minor suggested changes in August 2018 constitutes an unnecessary repetition and should therefore be deleted.

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?

1. London First raised concerns about Policy D8B at the consultation stage. Policy D8B has since been extensively reworked as part of the GLA's minor suggested changes to the extent that the amendments go beyond the definition of 'minor'. As a consequence, London First now raises stronger objections to the content of this policy.
2. Policy D8B as currently worded is ambiguous. By using language such as "*locations that are identified in Development Plans*" and "*boroughs should identify any such locations on maps in Development Plans*", this may be construed as meaning that boroughs should allocate specific sites for tall buildings. Further clarification is required, as such site allocations would be an unnecessary level of detail. Furthermore, Policy D8B would require significant resources, which not all boroughs may have available. In this context, it is submitted that the previous reference (in the December 2017 draft Plan) to "a plan-led approach" is more appropriate and should therefore be reinstated.
3. Policy D8B should provide more specific guidance about the types of locations that may be suitable for tall buildings, such as Opportunity Areas, town centres, and public transport nodes. In this regard, the new "only" inserted in the first line of D8B should be removed, as this sets an unnecessarily negative tone to this part of the policy.
4. Taking all these recommendations on board, D8B should be amended as follows:

B Tall buildings should ~~only~~ be developed in sustainable locations that are identified ~~in Development Plans~~ as part of a plan-led approach to changing or developing an area. By following the processes required in parts A, B and C of Policy D2 Delivering good design boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. Such locations may include, but not be limited to, Opportunity Areas, town centres and public transport nodes. Boroughs should identify ~~any such locations on maps in Development Plans~~ the locations where tall buildings will be an appropriate form of development in principle, and should indicate the general building heights that would be appropriate in these locations, taking account of:

- 1) *the visual, functional, environmental and cumulative impacts of tall buildings (set out in part C below)*
- 2) *their potential contribution to new homes, economic growth and regeneration*
- 3) *the public transport connectivity of different locations.*

This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.

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

1. London First supports the intention of Policy D8C to ensure that proposals for tall buildings are assessed robustly. Given their potential for wider impact (visually and resulting from the quantum of development), it is right that they are thoroughly assessed and scrutinised. Whilst local policy may suggest general heights for tall buildings, it is appropriate that height is tested rigorously through the design process rather than arbitrary limits imposed through planning policy.
2. However, the criteria set out in D8C are so extensive that they take up almost two pages of the draft Plan. This is unnecessarily detailed and prescriptive for a strategic policy in a Spatial Development Strategy. The overall ambitions of the policy, and its contribution to the Good Growth strategy, should be set out in a far more succinct manner.
3. Authoritative national guidance on tall buildings is set out in the publication *Historic England Advice Note 4: Tall Buildings* (Historic England, 2015). This represents an update of the previous design guidance by English Heritage and CABE, produced in 2007. The Advice Note seeks to guide people involved in planning for and designing tall buildings so that they may be delivered in a sustainable and successful way through the development plan and development management process. It is a significant material consideration in the assessment of any tall building proposal in London.
4. Policy D8C of the draft Plan replicates in detail the national best practice guidance which already exists in sections 4 and 5 of the Advice Note. Architects and urban designers should be following this guidance in any event. The result is an inappropriate level of detail and prescription for a Spatial Development Strategy policy. For these reasons, the policy fails to meet the requirements of the Greater London Authority Act 1999 and NPPF2 to ensure that the Plan only contains policies that are necessary to address the strategic priorities of Greater London. London First therefore recommends that D8C should be substantially

reduced in length, make reference to the guidance in *Historic England Advice Note 4: Tall Buildings*, and only contain guidance that is of strategic importance to London and is not already covered in the Advice Note.

5. Finally, and notwithstanding our requests above, it should be noted that the opening paragraph to D8C is confusing. It currently states, “*All the following impacts should be addressed within plan-making and in development proposals*”. Our reading of the remainder of D8C is that the criteria clearly relate to development management and the assessment of a specific tall building proposal. Therefore, if D8C is retained in its entirety, the reference to “plan making” should be deleted from this sentence.

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. It is disappointing that the original opening sentence to Policy D8 has been deleted as part of the GLA’s minor suggested changes in August 2018. This sentence provided vital context to D8, by emphasising the strategic importance of delivering tall buildings in appropriate locations, and it should therefore be reinstated.
2. With regard to Parts A and B of D8, as set out above, amendments are required to ensure the effectiveness of this policy and its contribution to the delivery of the Good Growth objectives, in particular GG2, GG4, and GG5.
3. As currently worded, the policy is ambiguous as to its expectations of the boroughs and whether they should make detailed site allocations for tall buildings or designate larger areas such as Opportunity Areas, town centres, and public transport nodes. Furthermore, there remains a risk that boroughs that do not favour tall buildings could take an overly conservative approach to building height that risks constraining that particular area’s growth potential. Including the reference to tall buildings being substantially taller than their surroundings within D8A would help mitigate this risk.
4. In conclusion, tall buildings can play an important role in regeneration and delivering the new homes and commercial floorspace that London needs. However, in contrast to the current Plan, Policy D8 of the draft Plan would seem to inhibit the development of tall buildings in promoting Good Growth. D8 needs to be more ambitious if the Plan is going to make the best use of land by supporting higher densities and intensification in appropriate locations. High-density development does not always need to be tall, but other forms of high-density development, such as mansion blocks, are generally restricted to larger sites and are not always practical to deliver. Tall buildings will need to play a role in increasing housing delivery and ensuring

that the best use is made of all development opportunities if the Plan is to deliver on its Good Growth objectives.