

Hi,

We had issues accessing the data base, please accept our submission below:

Our principal concern relates to the absence of a London wide policy on where tall buildings in London should be permitted and where not. Policy 7.7 was setting clear criteria that gave a London-wide direction on tall buildings. It specified areas where they normally should be and criteria where they are generally not appropriate

(a generally be **limited to sites in the Central Activity Zone, opportunity areas, areas of intensification or town centres** that have good access to public transport

b only be considered in areas whose **character** would not be affected adversely by the scale, mass or bulk of a tall or large building)

The omission of a London wide direction leaves it to local authorities to set their own criteria and principles. This can lead to different authorities taking different approaches and result in a very uncoordinated tall buildings-landscape across London. It also has no safeguards in the policy that helps Local Authorities defend planning decisions in the absence of the detailed masterplans and frameworks studies the London Plan requires them to undertake.

The omission of 'character' from the tall buildings policy is dangerous, as it is not just the general impact and visibility of a tall building that counts but their experience from people in the urban fabric. They have a significant impact on character and feel of an area, and this needs to be acknowledge by the policy as 7.7 has done so successfully.

While the requirement for forward planning at a local level is generally welcome, many LA's will not have the resources and ability to prepare these to cover the areas with development pressure in time to guide development that is coming through the pipeline. This leaves the door wide open for developer to argue that tall buildings will be required to 'optimise' the potential for a site. As the density matrix has also been omitted there is no general direction of what density may be appropriate in areas that so far have been considered as urban or sub-urban (and which may happen to be located next to transport hub or underground station). The London Plan is the right place to proactively define a vision for the form, shape and skyline of the capital, as this requires a pan-London view and cannot be left to LA's alone. Especially as tall buildings affect the skyline and city image across London and hence their impact is much wider than the LA's area alone.

Best,

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Director

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