

**LONDON PLAN INQUIRY**

**TALL BUILDINGS: MATTER NO. M40**

**WRITTEN STATEMENT FROM ALLIES AND MORRISON**

**Date: 11 January 2019**

Allies and Morrison Urban Practitioners are delighted to submit this written statement to support the London Plan inquiry in relation to matter M40 on Tall Buildings. We have responded to each of the questions set by the Inspector below.

1. Would the local definition of what is considered a ‘tall building’ provide an effective strategic framework to guide the location of tall building development?

We would support the concept of more local definitions of what constitutes ‘tall’ in different parts of London. This would allow local character and prevailing building heights to inform a more context-led approach to assessing what is and is not appropriate. This definition should be based on a thorough characterisation of the borough which accepts that within boroughs there will be variances too. For example, boroughs such as Waltham Forest straddle a range of characters and densities from urban Walthamstow to decidedly suburban Chingford. One definition for the whole borough may not be appropriate for all.

However, with such a system there will also be disbenefits. The boundaries between boroughs may be the locations for contrasting opinions of what is considered tall. The system would require a method of agreeing definitions across borough boundaries.

More fundamentally, we believe this policy should shift away from defining ‘tall buildings’ and focus more towards appropriate locations for higher density. We expand on this point in Question 3.

2. 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?

We support the minor changes made to the draft text in 3.8.2 to remove the specific City of London definition. We also support the identification of the River Thames environment as a sensitive location and therefore where a lower threshold should be applied. The imperative should be for local authorities to undertake thorough characterisations in order to define tall building thresholds in their area, and therefore making the contingency definition any more specific may not be helpful.

Instead of providing a single, generic height definition for what a ‘tall building’ is across London, we would support a technical definition of ‘tall’ that is based on an objective methodology that can be applied by all boroughs in any neighbourhood. For example, a proposed building could be considered ‘tall’ if its indicative height exceeds an additional 50% above the existing prevailing height. This methodology would encourage multiple local definitions of what is tall

and avoid arbitrary height definitions that may be unsuitable and become problematic. For example, a 30m height in parts of outer London and in more suburban centres sets a high threshold for this contingency position and could lead to undesirable results in the interim period before boroughs have established their own definitions.

3. 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?

We appreciate the intention behind the policy and the challenges that the policy is seeking to address. Taller buildings are an emotive issue and planning officers are frequently found on the back foot and without the resources to stop proposals for inappropriate tall buildings. A more locally derived definition of tall will provide a stronger policy basis for planning decisions and we would support this intention.

Locations for tall buildings should not form part of planning policy, but locations for higher density development could. The planning system works at its best when it is constraint driven. Tall buildings should remain the exceptions to policy, and ones that result from a detailed analysis of site, context, setting and ambition. Each proposal should be context-led and make its own argument with respect to density and opportunity.

Whilst establishing the limitations to skyline development are an important part of the planning system, positively planning for the development of tall buildings is not. In our view, it is important that planning policy does not prescribe specific building typologies for specific sites (noting that tall buildings are not a typology in their own right). Rather it should identify locations for higher densities where tall buildings could be part of the mix. The decision as to whether or not the best site response is a tower, a dense courtyard block or a mansion block will be resolved through site and context analysis and masterplanning.

Identifying broad locations for tall buildings at a resolution far removed from the scale of a site would have negative consequences. Deciding on which building typologies are most appropriate is the role of masterplanning through site specific studies, not borough-wide planning.

An important negative consequence to identifying locations for tall buildings is the significant weakening of negotiation power on the part of the planning authority. Once an area has been defined in policy, any landowner or developer within this area can put forward a proposal for

a tall building, the design of which need not be exceptional, the detailed location for which need not be ideal and any imperative to explore the most appropriate mix of typologies on the site is lost. Underneath this process, lies another important negative consequence which is land value. Once a tall building area has been defined, the value of all the sites within it are raised and locked to their future redevelopment as a tall building, regardless of whether the individual site characteristics would support this typology response.

London's character is diverse. Where tall buildings have worked best in the city, they have been the result of intense analysis and have resulted from context-led masterplanning and design. Tall buildings are not a common characteristic of the city and planning needs to continue to treat them as exceptions to the norm, exceptions that deliver attractive contrast as the result of design integrity not top-down planning.

We suggest that Policy D8 maintains the sections under the headings "Definition" and "Impacts" (Sections A and C of the policy), but that the section on "Locations" is removed or altered significantly.

One approach could be to simply change the requirements on local authorities, asking them to instead identify potential locations for higher density development. This would enable the response to this planning requirement to be determined through masterplanning rather than second guessed at the policy level.

However, we would advocate a revised approach to the policy which asks local authorities to classify areas according to their 'sensitivity to tall development' within a spectrum ranging from low to high sensitivity. This would allow boroughs to assess and communicate the impact of tall developments without having to commit to identifying specific locations for tall buildings. Sensitivity to tall development would be established through a process of overlaying the following information to establish a picture of constraints and sensitivities:

- Thorough characterisation of the borough
- Prevailing building height
- Strategic and local view cones
- Topography
- Connectivity and accessibility (ideally a combination of PTAL and other accessibility information)

This approach shifts the emphasis on the identification of locations to those with least constraints rather than identifying areas most appropriate. It is a subtle wording shift but is underpinned by a different philosophy and methodology. It would also leave the responsibility of proving a site is appropriate for a tall building to the developers of each site, rather than giving this away at policy level.

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

We support the “Impacts” section of the policy (Section C) and believe this section identifies some of the key aspects for consideration in the assessment of tall building proposals. We would suggest this section could be strengthened by giving reference to the need to have proposals informed by local character. Stronger recognition of the wider negative impacts tall buildings can have along the River Thames would also be beneficial. The loss of the reference to the need to protect the river’s open character is disappointing.

5. Overall, would Policy D8 provide an effective and justified strategic framework for the preparation of local plans and neighbourhood plans in relation to this matter?

Policy D8 will require some careful revisions and clarifications in order to become the effective and justified strategic framework that can support local and neighbourhood plans. A summary of the key revisions and clarifications we propose are as follows:

- Tall buildings should remain the exceptions to policy. Each proposal should be contextualised and make its own argument with respect to density and opportunity
- The definition of what is considered a ‘tall building’ should be based on a thorough characterisation of the borough which accepts that within boroughs there will be variances too.

- Where a local definition of what is considered a 'tall building' does not exist, we propose that a technical definition based on an objective methodology be applied by all boroughs across London.
- In this scenario, a proposed building could be considered 'tall' if its indicative height exceeds an additional 50% above the existing prevailing height.
- Boroughs should not define the location of tall buildings but instead could suggest areas that are more or less sensitive to tall building development.
- We disagree with policy identifying locations for tall buildings and would instead recommend focusing on appropriate locations for higher density or areas of lower sensitivity to taller buildings.

Total statement words: 1,409 words