

The London Plan Examination in Public 2018-2019

Organisation: Levitt Bernstein

Date: 10 January 2019

Matter: 41

Tall Buildings

Written statements in response to M41 may be up to 3,000 words in length.

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?

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?

Although it is correct to say that high density development need not mean high rise, there is no doubt that the recent spate of new residential towers has been largely about increasing numbers. All designers know that beyond a certain threshold, going taller becomes the only way to increase density.

Notwithstanding that pledges that quantity should not come at the expense of quality, many recent developments suggest that numbers matter more. We are very supportive of use of offsite construction methods where appropriate but some of the modular towers built over the last few years are poorly designed and constructed and have not created buildings (or housing) of durable quality. Many do not provide any private outdoor space despite a policy to do so.

We are very concerned by the recent proliferation of tall buildings, particularly the increase in residential towers. These are expensive to build, highly serviced and energy - and management-intensive. All of this is reflected in high capital costs and high service charges.

Such an increase in high rise residential buildings also takes us into uncharted territory in terms of their long-term environmental and social impacts. There are relatively few precedents when it comes to major refurbishment. Historically, new build high-rise blocks have tended to be in council ownership and flats have been rented albeit with some leaseholders as a result of Right to Buy. This has made it possible to decant residents where major work is needed; Park Hill in Sheffield is a good example.

This is much more difficult when flats are sold. It will be almost impossible to empty a private tower block when major work is needed 20-40 years on. The risk is that they fall into gradual decline with only urgent repairs carried out on an ad hoc, piecemeal basis. As the building degrades, people will leave. Those who remain may find it hard to sell and/or find themselves in negative equity, and service charges may no longer cover costs. We know that physical decline is linked to social and economic decline; in promoting tall buildings (which is effectively what is happening) the GLA should be mindful of the long-term social and practical implications, particularly as tall buildings are inevitably also visually dominant.

The proposed definitions of a tall building suggest that ‘tall’ is a relative term rather than an absolute one. Does it mean the same as high-rise and, if not, what is the difference? There is much talk of mid-rise solutions - is it not the case that anything taller than the upper limit of mid-rise is a tall building - what is it if not? Before defining high rise or tall, it would therefore be sensible to define mid-rise. Until relatively recently it meant 4 to 6 storeys; two or three decades later 12 storeys is now often referred to as mid-rise.

Allowing the target to move in this way ignores the fact that height is largely perceived in relation to the human eye level - something that has barely changed for centuries. It remains the case that when residential streets

are lined with buildings over say 8-9 storeys they begin to feel dark and overbearing. Wider streets may cope with 12 storeys and large public spaces possibly 15 but our ability to relate to buildings diminishes as their height increases, particularly when they are bland, extruded forms.

It is therefore vital to consider height alongside form and massing. While introducing gaps between tall buildings brings some relief and allows daylight to penetrate, it also starts to break down the street-like quality and change the character to something less familiar and understandable. The difference between 9 storeys and 25 or 50 storeys is not just significant in terms of height; it is significant in terms of the forms and massing it generates, and to our experience of place.

Policy D8 needs to recognise that tall buildings are very diverse – not only in terms of height but also in terms of the places that result. This is particularly important in a residential context, so we suggest that the policy should be more nuanced; deal not only with different height bands and forms, but also with different uses. In particular, it seems crucial to include specific policy for the design requirements of residential towers. For example, tall residential buildings also require different approaches to the provision of private and shared open space, including play space; winter-gardens will often be more appropriate than open balconies. Shared outdoor space may need to be distributed throughout the building rather than confined to the top and the bottom, particularly when housing families.

Large monocultures of a single tenure or particular demographic should be avoided, and intergenerational living promoted by providing a variety of dwelling types, including duplexes, and a range of supporting facilities. Mixed tenure approaches are much more difficult to achieve using high rise typologies and hence the creation of mixed, sustainable communities is not achievable using a predominance of tall buildings. High management costs and service charges essentially often preclude affordable tenures and therefore development using solely high rise typologies can cause tenure segregation. Well designed family homes are also harder to achieve within high rise buildings, without careful consideration, as homes at higher levels are usually physically further from shared amenity space, which is essential for family living and child health and development.

We need to be aware that this variety is not often achieved in residential high rise forms where, most often, all floor plates conform to the same configuration. This can mean that environmental conditions are not optimised throughout the building. The approach to design and construction must allow for as much daylight and sunlight as possible to enter the lower floors while ensuring that the upper floors are protected from wind and overheating. High rise typologies, dependant on form, can also lead to a high proportion of single aspect homes which also should be avoided.

While policy D8(C3a) makes mention of wind and requests that it is 'carefully considered' this should be strengthened to require microclimate analysis, such as computational fluid dynamics (CFD) or wind tunnel testing, to demonstrate that comfort and enjoyment on balconies and around the building is not compromised. Again, this relates to the definition of tall buildings, with wind effects typically felt around buildings of 8 or more storeys, where located next to open land, or where streets and buildings are aligned to the prevailing wind direction.

As D8 acknowledges, fire safety is a priority in tall buildings. Therefore, specific policy with regard to residential tall buildings is key.

The treatment of the lower floors is extremely important, as highlighted in clause 3.8.6 and the pressure for bin and bike storage at ground level for a large number of dwellings can often create inactive frontages. Non-residential uses usually provide a more active frontage at street level and these should be promoted. We question whether Policy D8 supports the Good Growth principles; in particular GG1, GG3, and GG4.

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?

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

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?

We support point B - tall building locations under D8 – where taller buildings should be part of a plan-led approach. However, for this to be an effective guiding framework there should be well defined taller buildings strategies developed by each borough once these areas have been identified on their individual development plans. The taller buildings strategies will allow individual boroughs to test the impacts – stated under D8.C – e.g. contribution of these buildings to surrounding character of the place D8.C. 1.a.i.

A taller buildings strategy is critical and should form part of any plan-led approach – this is particularly important, given the definition of taller buildings as set out under 3.8.2. How tall can certain clusters should be and what the maximum thresholds for heights in designated areas are – these again should be considered carefully in relation to short, medium and long-term phasing and delivery plans for these areas.

Under section 3.8.1, we see the mention of making optimal use of the capacity of sites which are well connected by public transport with good access to services and amenities – this is a good justification for taller buildings and higher density living however, merely maximising the capacities of sites of this nature has resulted in some very dense, overshadowed and unpleasant neighbourhoods. Therefore, sufficient guidance on dwelling typologies for taller buildings, space standards and aspect, tenure mix, private and public amenity space standards should be defined within the plan-led frameworks/approach by each borough – this could help set constraints in terms of layout, quantum and design terms and raise the bar on quality of taller buildings.