

## **Tall Buildings: Advice on plan-making, submitting, assessing and deciding planning proposals: Consultation**

### **Response from London Forum of Amenity and Civic Societies**

The London Forum is the umbrella body for about 100 amenity and civic societies across London. We have been very concerned about the development of planning policies for tall buildings in London.

### **Need for tall buildings to make a positive contribution to townscape and skyline**

We have made representations on this issue at successive examinations of changes to the London Plan because of the apparent inconsistency between the approach to architecture – Policy 7.6 in the current (2011) London Plan, which says:

“Architecture should make a positive contribution to a coherent public realm, streetscape and wider cityscape.”

In contrast the policy for the location and design of tall and large buildings Policy 7.7 says:

“Tall buildings should not have an unacceptably harmful impact on their surrounding.”

While the GLA would argue that people need to read the plan as a whole, the appearance is that there a significantly lower “bar” for tall buildings. We have pressed for the Policy 7.7 to be amended and for the sentence above to be revised to read:

“Tall buildings should make a positive contribution to a coherent public realm, streetscape and to the London skyline.”

With regard to consultation document, London Forum propose a change to paragraph 2.1 by removing “city life” – which is unhelpfully vague – and replace it with “a coherent public realm, streetscape and to the city’s skyline.”

This needs to be reflected in Section 5: Assessing proposals by adding at the end of paragraph 5.1:

“Tall buildings should make a positive contribution to the public realm, streetscape and to the city’s skyline.”

## **Need for advice on decision taking on tall buildings**

The document proposes approaches to policy design in local plans and a number of ways for assessing proposals for tall buildings, but does not reflect NPPF (paragraph 64) proposals that:

“Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.”

Paragraph 5.6 refers generally to the Government’s policy on design, but gives no clue as to key design considerations, particularly the need to refuse poor design. We would like to see the failure to take opportunities for improving the character of the area interpreted positively as a test of whether the tall building makes a positive contribution as in our proposed rewrite of paragraph 2.1 (see above).

### **Minor changes:**

Para 2.1: 'in the right place ..serve as beacons of growth and regeneration and stimulate further investment' Apart from the metaphor, ' stimulate further investment might' imply investment in the same sector. Possibly, stimulate investment in other sectors or stimulate investment more broadly.

Para 3.3: 'linking to the transport system' possibly considering its context within the transport system.

Para 5.1: 'their' within the last sentence should be clarified. Should this be 'its' ie the historic environment?

Para 5.3: 'local plan' should it be plan's?

Para 5.9 Insert 'may' - 'which offer opportunities'

Para 6.3 The phrase 'in the round' sits oddly. - overall ?

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