

# London Forum of Amenity and Civic Societies

## Response to GLA Planning and Regeneration Committee Investigation

### Planning and Tall Buildings

#### Introduction

The London Forum welcomes this investigation into homes in tall buildings, and its focus on evidence relating to the experiences of different groups of residents in such buildings, the impact on wider communities, and how tall buildings policy should be handled in the forthcoming London Plan. Our response foregrounds planning, and the issues we believe must be addressed in the London Plan. But like the Committee, we believe that policy should be based on evidence.

Our brief response on planning is therefore accompanied by two Annexes. Annex 1 provides an analysis of how planning policy for housing delivery has developed over the past thirty years, with its emphasis on tall buildings. Annex 2 provides an outline response to the first two detailed questions set in the Call for Evidence, on the experiences of the different groups of residents, and the impact on wider communities across London. We draw on evidence from our member societies, but also on a number of recent reports, in particular the Centre for Cities recent report *What is the Future of High-Rise Housing* [here](#), the report on the future of high-rise housing by the LSE which has some useful recommendations from page 142 onwards [here](#) and a report on the perceptions of safety of residents in tall buildings which was **published** by the Government which relates to the committee's question 2 a. We commend these reports to the Committee, and especially their findings and recommendations.

### Tall Buildings and housing delivery in London

Our conclusion from the historical and other evidence we present in Annexes 1 and 2 is that the following issues need urgent attention in the next London Plan:

- reviewing the impact of tall buildings over the last decade:
  - on our communities – are they comfortable with the change – 270 tall buildings over 20 storeys completed in the last 10 years – predominantly housing, but very few affordable homes; and
  - on our townscape, skyline and, in particular on the Thames.
- reconfirming that the plan-led approach through London Borough local plans, rather than GLA officers actively encouraging major departures from local plans.
- reviewing the housing targets in Opportunity Areas, many set before 2011 London Plan - most are untested and are now generating very high densities and tall buildings.
- reviewing the tall buildings pipeline – at least 20 years' worth – which is like a drag anchor on housing delivery.
- improving build-out rates.
- considering how life-time costs of tall buildings can be factored into planning policy and decision-making.

- reviewing the balance between tall buildings built for different tenures and for different groups of people, including the mix of sizes of homes (single-bed up to large family-sized units); student accommodation; large-scale co-living developments; build-to-rent; and affordable housing, especially social rent.
- determining where we want to be in 20 years' time – what kind of London do Londoners want?

## Annex 1

# Development of policy and process for delivering tall buildings

London Forum of Amenity and Civic Societies has compiled this timeline and has drawn conclusions at the end of it.

### **2000-2008: Mayoral advocacy of tall buildings**

The first Mayor of London, Ken Livingstone, was an advocate for tall buildings, although at the time he and his deputy, Nicky Gavron, both considered that there was a limited market, perhaps less than 20 buildings and that these would be primarily for commercial uses, such as offices.

### **2002: Mayor's Interim Guidance on Tall Buildings:**

In advance of producing the first London Plan, the Mayor issued a set of interim guidelines regarding the development of tall buildings in London, outlining where such buildings would be considered appropriate, what design considerations should be taken into account, and how they should integrate with the existing cityscape. This was essentially a temporary policy until a more comprehensive policy could be established. It set the tone for the Mayor's support for tall buildings.

**2004:** The first London Plan produced a policy (4B.8) through which tall buildings were generally encouraged to be developed in specific areas like the Central Activities Zone (CAZ) and Opportunity Areas, where they could act as landmarks, enhance regeneration, and contribute to a coherent economic cluster, but only if they were designed to be architecturally high quality and did not negatively impact surrounding areas with regards to overshadowing, views, or character; essentially prioritizing good design and appropriate locations for tall buildings.

The basic elements of Policy 4B.8 of the 2004 London Plan were that the Mayor would promote tall buildings and would work with boroughs to identify suitable locations for them.

From 2000 to 2008, the Mayor encouraged developers by actively supporting their proposals both on application and on appeal, with GLA officers even appearing as advocates at public inquiries (e.g. Lots Road Power Station).

In 2008 the Mayoral Call-in criteria were changed by Article 7 of the Town and Country Planning (Mayor of London) Order, which enabled the Mayor to call in cases where a London borough proposed to refuse an application involving tall buildings. This enabled the Mayor to override a borough's decision to refuse an application for tall buildings.

### **2008 -2021**

In 2008 Boris Johnson became Mayor of London, and although initially concerned about the increasing number of applications for tall buildings, he in fact, through his development management function, continued to support the development of tall buildings, through negotiating for changes to the development, and, if the borough proposed refusal, used his call-in powers to requisition the case for his decision.

Since 2008 both Boris Johnson and Sadiq Khan have called in applications for tall buildings that boroughs have proposed be refused, and have subsequently granted consent for almost all of these applications, in many cases after having negotiated a further increase in their size and/or height, often for the delivery of more affordable housing.

That was achieved by the use of grant funding from the Government to help developers to achieve viable developments with increased low-cost rent homes in their schemes.

The issue of Mayoral call-in was explored in a 2021 Assembly scrutiny at which London Forum of Amenity and Civic Societies gave evidence, which confirmed that call-in was used specifically to allow the proposed developments.

The Assembly Planning and Regeneration Committee responded in January 2021 with the response [here](#) to the Mayor's 'Good Quality Homes for All Londoners London Plan Guidance'. In it they made many recommendations for consideration of tall buildings, alternatives to them, operational requirements, environmental impact, costs and housing types. London Forum supports those proposals and expects the current scrutiny of the Committee will identify the issues to be addressed by revised policy.

### **London Plan 2021: Policy D9: Tall Buildings**

In the 2017 draft of the current London Plan there was a Policy D8: Tall Buildings, in which the Mayor devolved the planning of tall buildings to London boroughs, requiring them, through their local plans, to define what is a tall building in their local context and to identify on maps in their Development Plans the locations where tall buildings will be an appropriate form of development in principle.

Following the Examination of that London Plan, the policy (now Policy D9 in the published version) was amended by a direction by the Secretary of State in December 2020:

*3) Tall buildings should only be developed in locations that are identified as suitable in Development Plans*

This amendment was designed “to ensure that there is clear policy against tall buildings outside any areas that boroughs determine are appropriate for tall buildings”

### **New London Architecture: Tall Buildings Surveys 2014-2024**

In 2014 New London Architecture (NLA) held an exhibition at the Building Centre and published the result of a survey of tall buildings in the “planning pipeline” – between pre-application, through application, permission to build and under construction. The definition of a tall building used by the NLA survey is a minimum of 20 storeys, whereas the GLA's database uses a figure of 10 storeys. [We are currently awaiting more data from the London Planning Datahub]

The biggest revelation of the early surveys was the scale of the “pipeline”. The 2014 exhibition showed that there were 263 tall buildings in the “pipeline” and it came as a major shock, especially when visualisations were presented for the changing skyline. This was the first time the scale of change and, particularly the scale of future commitments, was evident.

The 2015 Survey, after improving the database, showed that there were in fact 436 tall buildings in the pipeline. By 2024, despite 270 tall buildings had been completed since 2014, there were around 600 tall buildings in the pipeline, or over 20 years' worth of completions.

Over this ten-year period there has been a significant change in the locations for these tall buildings, initially focused in the Central Activity Zone, especially the City of London and Isle of Dogs, and in Opportunity Areas, but increasingly now across many inner and outer London boroughs.

The other major change, however, has been the use of buildings. Although by 2014 the proportion of developments in the pipeline that were primarily residential had already exceeded 80%, now its share is closer to 90%.

The annual surveys include details of schemes that are likely to go ahead. A major feature is that few of the schemes produce even 10% affordable housing. There has been a significant number of towers for student housing, but most of the other additional housing has been in the upper end of the market, including buy to rent. As a result, although the potential locked up in the pipeline of these unimplemented developments has been estimated at 110,000 homes, the 2024 survey reports that the 270 schemes completed since 2014 had delivered an estimated 58,000 new homes.

## Conclusions and possible actions:

- Over the last decade NLA's annual survey showed that that 270 tall buildings had been completed which produced an estimated 58,000 new homes, or 16.5% all housing completions in London. Since affordable housing accounted for significantly less than 10% of these homes, the number of affordable units was probably considerably less than 5,000 units over the decade 2013-2023 or less than 500 per year. More data is needed on the occupiers of tall buildings, distinguishing both household size and income.
- The rate that the pipeline is being built out is very slow – it is quite possible that many of the schemes may no longer be viable due to increased build costs, especially if the current valuations of the sites are unrealistic. An accumulation of unimplemented or unimplementable consents may be a drag on the market. There needs to be either an incentive or penalty to encourage build out of these consents. The GLA should work with the Government to explore measures to tackle "unproductive land speculation" and slow build-out rates by developers of permitted residential sites, rather than blaming the planning system and 'red tape' for the housing crisis, according to the Institute for Public Policy Research (IPPR) [here](#).
- Tall buildings may meet the need for certain types of market housing, including student housing, although their contribution to affordable and family housing seems to be limited. the GLA should assess how adverse has been the use of available land for student and market housing in reducing the best land use to deliver social and other affordable housing.
- There is, however, a difference between consents and delivery, especially if the affordable contribution is no longer considered to be viable. The GLA should monitor the outcome of tall buildings applications, especially the amounts and types of housing delivered. This monitorin should be publicly accessible on the GLA Datahub people to consider. Furthermore, the Committee should seek information the Mayor's viability unit on trends in developers' viability.
- Greater emphasis is needed on the character of places that we are creating to get a better fit between the type of housing being delivered and the type of places that people need and want to live in. Planning decisions should take more account of the impact constraints in London Plan Policy D9 section C which will need review and emphasis.
- Too few Councils have yet identified locations where tall buildings would be acceptable as required by London Plan Policy D9 section B, which could have given assurance to communities and developers of what would be permitted and where. The Committee should consider how it might help borough planners with the skills and resources required for spatial planning and design coding for tall buildings.

## **Annex 2**

### **1. Residents' Experiences of Tall Buildings**

Many different kinds of people live in tall buildings across London. Such buildings are entirely satisfactory for people who choose to live in them, and who have an income high enough to meet the often-high costs as leaseholders or tenants. They may be particularly suitable for students and young people without children. But for families with children, and for people who have little or no choice as to where and in what kinds of housing they live, tall buildings can come with a host of problems. This is in large part because tall buildings are typically more complex and costly to build and maintain than medium and low-rise buildings.

The kinds of problems that arise for many residents of tall buildings include the following;

#### ***A. Design and Build Quality***

Residents often complain of a number of features that arise from poor quality design and building standards. These include

- Concerns about the adequacy of fire safety, emergency exit facilities and procedures
- Noise transmission through walls, floors, ceilings and ventilation systems.
- Lack, or poor quality of storage facilities, particularly for families with young children
- Heating and ventilation problems, including over-complex and user-unfriendly systems, and excessive heat in the summer
- Poor quality finishes on floors and walls that make them difficult to clean
- Problems with waste and refuse systems
- Poor lighting, with insufficient access to daylight and sunlight even at high levels, with windows that are too small.
- Structural problems leading to leaks and/or the growth of mould
- Accessibility problems for disabled people, including inadequate turning circles.
- Poor quality and inadequate communal facilities.
- Poor provision of green open space for residents at higher and intermediate levels and in the surrounding area.
- Poor internal arrangements for delivery and parcel reception and distribution.

It should be added that many of these problems arise from inadequate quality-control during building, but also problems with building regulations and related standards and guidelines.

#### ***B. Building Management and Maintenance***

Residents typically have little say in the selection of managing agents, and they complain repeatedly of poor building management and maintenance, including

- Repeated and often lengthy lift breakdowns, along with malfunctioning access doors
- Leaks “through multiple floors, multiple times”
- Unresponsive building managers and managing agents
- Ineffective and inefficient management arrangements for all tenures to involve residents and react to their concerns in a timely manner, including on repairs and major refurbishments.
- Poor management and cleaning of communal areas internally, and of external grounds

#### ***C. Transparency on Costs and Service Charges***

Residents face both a regular and an irregular but usually large problem over costs. Annual service charges rise every year. But it is often unclear to residents exactly what they are paying for. Regular maintenance and cleaning are usually provided, along with insurance. But services may include energy supplies, concierge services, or the use of roof gardens, gyms or swimming pools to which some residents are uncertain as to whether they do in fact have access. Similarly,

there are often complaints of lack of information about how the charges are calculated, and of large adjustments after the end of the year. Some residents complain of managing agents who they believe regard the service charge as their “piggy bank”.

Unexpected large-scale bills for major or unforeseen structural, heating or electrical repairs and refurbishment are a constant worry for many residents. Only a minority of residents in tall buildings pay regularly into sinking funds to mitigate (or even meet) such costs. When large bills arise, residents often complain of their size and lack of transparency as to how they have been calculated.

Underpinning residents’ concerns about both service charges and the large irregular bills are limitations in their understanding of the rights and obligations of leaseholders. It is not in the interests of developers or freeholders to provide accurate information about long-term costs; nor do they typically seek to ensure that buildings are specified and constructed in ways to minimise those costs.

## **2. Impact of Tall Buildings on the Wider Community**

### **A. Size of Units**

One of the key impacts of tall residential buildings on the wider community results from the over-emphasis by both planners and developers on homes suitable for one, two, or at the most three people. For developers, they are cheap; for planners, they help to maximise numbers and meet housing targets. For families, and people wishing to have children, the lack of available accommodation to meet their needs is disastrous. The result is unsustainable levels of emigration, from inner London in particular; and efforts to meet the GLA’s and individual boroughs’ goals to develop balanced and sustainable communities are thus disastrously undermined, if not set at nought. There must be a thorough review of policies and strategies relating to housing mix across London.

### **B. Physical Impacts**

The design problems we have outlined above have adverse effects not only on residents of tall buildings, but on the community at large. These include:

- Inadequate space around tall buildings and set back from the pavement to avoid them being overwhelming and with activity and walk-throughs at the ground level.
- Complex routes through clusters of tall buildings, making them difficult to navigate and reducing their permeability
- Inadequate off-road parking for delivery and service vehicles.
- Reductions in daylight and sunlight, accompanied by adverse wind effects around and within clusters of high buildings.
- Cliff-edge domination of towers looming over low rise houses with small gardens, particularly when the tall buildings are to the south of them.
- Visual dominance over the River Thames, reductions in visual access to the river, worsened by tall buildings that present their least attractive face to those living behind them.

It is essential that attempts are made in policy to mitigate these kinds of problems.