



<p><b>P14 Tall Buildings Plan pages 42 &amp; 43</b></p>	<p><b>Not Effective</b></p>	<ul style="list-style-type: none"> <li>• Not stating there has been a significant policy change which means tall buildings may now be permitted anywhere in the borough.</li> <li>• Not determining what is “a point of townscape significance” or what is “proportionate” in making decisions.</li> <li>• Not defining what a tall building is and not clarifying what “significantly taller than their surroundings” means.</li> <li>• Not explaining what “new publicly accessible space at the top of the building” refers to.</li> </ul> <p><b>This policy is not effective as it</b></p> <ul style="list-style-type: none"> <li>• Does not demonstrate how it will measure the increase in the activities and life opportunities on offer for nearby residents.</li> <li>• Is unclear how it can deliver the identified net increase of affordable housing by 799 homes per year.</li> <li>• Gives insufficient consideration to other more effective ways of combatting the housing need without introducing negative effects of tall buildings.</li> </ul>
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<p><b>Suggested changes to P14</b></p>		<p><b>To make the policy sound, the NSP should</b></p> <ul style="list-style-type: none"> <li>• Identify specific sites in the borough where tall buildings are appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative heights should be put out for consultation with local residents and businesses.</li> <li>• Make clear that tall buildings will be considered inappropriate in all other locations.</li> <li>• Clarify all vague or unspecified sections, including <ul style="list-style-type: none"> <li>○ Policy 2.11 reflecting 3.8.4 of the New Draft London Plan and confirm that the space will be truly publicly accessible, for example through a free viewing gallery.</li> <li>○ References to “criteria” should make clear exactly what those criteria are.</li> <li>○ A clearer definition of tall buildings to be provided, as indicated by New Draft London Plan Policy D8 part A.</li> </ul> </li> </ul>
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## BACKGROUND DETAILS TO DRAW ON IF YOU WISH FOR P14 TALL BUILDINGS POLICY

Policy Number + Topic + page umbers	Soundness test	<u>OBJECTION / TEST OF SOUNDNESS</u>
<b>P14 Tall Buildings Plan pages 42 &amp; 43</b>	<b>Not Justified</b>	<p>This policy is not justified as it involves a significant policy change from the previous policy on tall buildings and there is no evidence to support this policy change:</p> <ul style="list-style-type: none"> <li>• The 2011 Core strategy identified particular locations in the borough where tall buildings were appropriate, and this was supported by a Tall Buildings Research Paper (March 2010). No similar study has been undertaken to support the new policy that tall buildings may be appropriate anywhere in the borough.</li> <li>• Without specific locations that are identified in Area Visions and maps (pages 94 – 336) and detailed in site allocations; local people cannot contribute to the decision of where such buildings will be situated, either in their borough or local area. Similarly, it renders all Area Visions meaningless and places communities vulnerable to all Tall Buildings proposals affecting their area to be developer-led. (It is understood that locations for tall buildings will instead be reviewed by the Southwark Design Review Panel, whose reports are not made public until a planning application is published, too late in the process for local residents and businesses to influence decision-making</li> <li>• The policy has not properly taken account of, or responded to, consultation responses to the proposed change of policy as identified in the Consultation Report (pages 31-32) that stated specific locations for tall buildings should be defined in the NSP: the Council response states a need for “flexibility”, but again does not back this up with evidence.</li> </ul>
	<b>Not Consistent with National Policy</b>	<p><b><u>A/ Current London Plan</u></b></p> <p>This policy is not sound because it is not consistent with the Mayor’s current London Plan 2016 (Policy 7.7 pages 293-295):</p> <ul style="list-style-type: none"> <li>• 7.7 Part A Strategic “Tall and large buildings should be part of a plan-led approach to changing or developing an area by the identification of appropriate, sensitive and inappropriate locations”; which is the opposite of the NSP which indicates that tall buildings could be located anywhere in the Borough, unless they interfere with a strategic protected view.</li> <li>• 7.7 Part E LDF preparation “Boroughs should work with the Mayor to consider which areas are appropriate, sensitive or inappropriate for tall and large buildings and identify them in their Local Development Frameworks”; but the NSP does not indicate any attempt to identify locations in conjunction with the Mayor</li> <li>• Consequently, the NSP does not comply with or reflect: <ul style="list-style-type: none"> <li>○ 7.25: Tall buildings should be resisted in areas that will be particularly sensitive to their impacts and <b>only</b> be considered if they are the most appropriate way to achieve the optimum density in highly accessible locations</li> <li>○ 7.28: The Mayor will work with boroughs to identify locations where tall and large buildings might be appropriate, sensitive or inappropriate</li> </ul> </li> </ul> <p><b><u>B/ New Draft London Plan</u></b></p> <p>This policy is not sound because it is not consistent with the Mayor’s new draft London Plan, where policy D8 on Tall Buildings states that Development Plans <b>must</b> undertake the following:</p> <ul style="list-style-type: none"> <li>• D8 Part A: Definition “Development Plans should define what is considered a tall building, the height of which may</li> </ul>

		<p>vary in different parts of London”; whereas the NSP gives no specific height for a tall building (though previously this was defined in line with Mayoral guidance).</p> <ul style="list-style-type: none"> <li>• D8 Part B: Tall building locations “Tall buildings should be part of a plan-led approach to changing or developing an area. Boroughs should identify on maps in development plans the locations where tall buildings will be an appropriate form of development in principle and should indicate the general building heights that would be appropriate”; but there is no plan-led approach to tall buildings in the NSP, which are not identified in maps with indicative heights.</li> <li>• 3.8.3: Mayor will work with boroughs to provide a strategic overview of tall building locations across London; but there is no indication of working with the Mayor in the NSP.</li> <li>• 3.8.4: Where publicly-accessible areas, including viewing areas on upper floors, are provided as a public benefit of the development, they should be freely accessible and in accordance with part G of Policy D7 Public realm (says “ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter”); but in NSP Policy 2.11 there is no indication of how publicly accessible the space will be.</li> </ul> <p><b><u>C/ National Planning Policy Framework</u></b></p> <p>This policy is not sound because it is not consistent with the National Planning Policy Framework, where paragraph 155 emphasises the need for “early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses” so that Local Plans reflect a “collective vision”.</p> <p>However, the concerns identified in the Consultation Report regarding lack of identification of where tall buildings are located (and which have not been properly taken into account); show no collective vision, with many local residents and businesses disagreeing with the view that tall buildings are an effective way to carry out regeneration and so solve the housing crisis.</p>
	<p><b>Not Positively prepared</b></p>	<p>This policy is not positively prepared as some aspects of the policy are vague or unclear:</p> <ul style="list-style-type: none"> <li>• “We have taken a consistent approach when planning for tall buildings and use a number of criteria to determine applications” <ul style="list-style-type: none"> <li>○ This sentence is useless in Policy P14 as a basis to determine planning applications unless it sets out the approach which will be taken or the criteria which must be met.</li> <li>○ It is also misleading given the significant policy change which means tall buildings may now be permitted anywhere in the borough.</li> <li>○ This change in approach should be clearly stated, and justified, as well as outlining how decisions will be made on issues such as what is “a point of townscape significance” or what is “proportionate”.</li> </ul> </li> <li>• The definition of a tall building is unclear, stating tall buildings are those which are significantly taller than their surroundings; but without clarity on what “significantly” means and in which situations the policy will apply.</li> <li>• The “new publicly accessible space at the top of the building” is not explained; but should be truly publicly accessible, as defined in 3.8.4 of the New Draft London Plan.</li> </ul>

	<b>Not Effective</b>	<p>This policy is not effective as it is unlikely to achieve its stated aims of contributing to physical regeneration, raising population density, and increasing the activities and life opportunities on offer for nearby residents: it is also unclear how it can deliver the identified net increase of affordable housing by 799 homes per year.</p> <ul style="list-style-type: none"> <li>• Insufficient consideration is given to other more effective ways of combatting the housing need without introducing negative effects of tall buildings (overshadowing, wind, microclimates) such as increasing density of lower-level buildings (e.g. 5-6 stories high); which also offer greater sustainability.</li> <li>• It does not provide specific guidance on how tall buildings will increase the activities and life opportunities on offer for nearby residents, so leaving open the possibility that developers will design properties solely to benefit the building's residents and users.</li> </ul>
<b>Suggested changes to P14</b>		<p>The NSP should</p> <ul style="list-style-type: none"> <li>• Identify specific sites in the borough where tall buildings are appropriate, these locations to be identified on area vision maps and within site allocations; and indicative heights should be given. These locations and indicative heights should be put out for consultation with local residents and businesses.</li> <li>• Make clear that tall buildings will be considered inappropriate in all other locations.</li> <li>• Clarify all vague or unspecified sections, including <ul style="list-style-type: none"> <li>○ Policy 2.11 reflecting 3.8.4 of the New Draft London Plan and confirm that the space will be truly publicly accessible, for example through a free viewing gallery.</li> <li>○ References to “criteria” should make clear exactly what those criteria are.</li> <li>○ A clearer definition of tall buildings to be provided, as indicated by New Draft London Plan Policy D8 part A.</li> </ul> </li> </ul>

## OTHER ISSUES THAT MIGHT BE CONSIDERED

<p><b>P14 Tall Buildings Plan pages 42 &amp; 43</b></p>	<p><b>Not Positively prepared</b></p>	<p><b><i>Other possible issues under “Positively prepared” (though need careful thought as there are wider implications for existing social housing)</i></b></p> <p><i>This policy is not positively prepared as it does not respond to objectively assessed need as identified in Strategic Housing Market Assessment:</i></p> <ul style="list-style-type: none"> <li>• <i>There is a need for family housing, social and affordable rent housing, housing for older people and homes for households with specialist needs identified in SHMA (Chapter 6, Tables 6.11, 6.14 and 6.15; Chapter 7, Tables 7.1, 7.2, 7.11 and 7.13);</i> <ul style="list-style-type: none"> <li>○ <i>Tall buildings are less appropriate for these households:</i></li> <li>○ <i>Families want flats lower down so keep an eye on children playing outside</i></li> <li>○ <i>Fire safety concerns: high-level flats not appropriate for wheelchair users or other people requiring specialist accommodation, or some of the more vulnerable members of society housed in social housing, or families with small children</i></li> <li>○ <i>Less likely to be affordable due to high service charges</i></li> </ul> </li> </ul>
	<p><b>Not Effective</b></p>	<p><i>This policy is not positively prepared as it conflicts with policies P1 P2, P5 and P6 (Affordable Homes, New Family Homes, Housing for Older People and Homes for Households with Specialist Needs):</i></p> <ul style="list-style-type: none"> <li>• <i>Tall Buildings are not appropriate for these households for the reasons identified above.</i></li> </ul> <p><b><i>Other possible issues under “Effective” (though need careful thought as there are wider implications for existing social housing).</i></b></p> <ul style="list-style-type: none"> <li>• <i>Tall buildings are inappropriate for family households and those requiring affordable accommodation for the reasons listed above.</i></li> <li>• <i>Housing families, those with specialist accommodation needs and those requiring affordable accommodation in the lower levels of tower blocks can increase the perception of social stratification with wealthier residents occupying the topmost luxurious “penthouse” flats.</i></li> <li>• <i>There are serious fire risk concerns associated with tall buildings following the Grenfell disaster – perceived risks may have significant negative impacts on the mental health and wellbeing of tower block residents, even if unjustified.</i></li> <li>• <i>Expensive flats in luxury towers may be less likely to sell in the current climate, as identified in recent Guardian article (Ghost towers: half of all new-build luxury London flats fail to sell, Friday 26 January 2018).</i></li> </ul>