

A Call for a Tall Buildings Policy

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Ike Ijeh



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Ike Ikeh is Head of Housing, Architecture & Urban Space. Before joining Policy Exchange, he worked for several large architectural practices including Foster + Partners, PRP and RHWL. Ike has written a number of books on architecture and has had cultural and political opinion pieces and commentary published in the national press and elsewhere. As a prominent award-winning UK architecture critic for over 10 years, Ike has also sat as a judge on a number of prestigious national architecture awards including the Architect of the Year Awards, Building Awards and the Carbuncle Cup. He is also founder of London Architecture Walks, London's original architectural guided walks provider.

© Policy Exchange 2021
Published by
Policy Exchange, 8 - 10 Great George Street, Westminster, London SW1P 3AE

www.policyexchange.org.uk

ISBN: 978-1-913459-84-0

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Introduction

The past 20 years has seen an unprecedented rise in tall buildings in London. Scores of tall buildings have been built, often in historic areas and at great risk to the integrity of the city's historic fabric as well as London's overall character and cherished global reputation as a city famed for humanising mass urbanism. Furthermore, hundreds of tall buildings are still proposed, promising to further undermine the form and character of the city.

And yet to date and in marked contrast to other historic cities, London operates no overall, comprehensive, coordinated, tall buildings policy to guide the development of high-rises in the city. Instead it is forced to navigate a preposterous municipal tightrope where each borough is permitted to pursue a completely autonomous tall buildings policy which is sometimes in open contradiction of whatever loose and aspirational London-wide policy ambitions might be set by the Greater London Authority.

Consequently there is no unifying, co-ordinated, city-wide vision for where tall buildings are to be located and what role they are expected to play in the strategic character and identity of the city. The result is a lack of clarity and certainty in the planning process which encourages the opportunistic overdevelopment London now commonly plays host to as well as a procession of expensive and time-consuming public inquiries that can hold up the already glacial planning process for years.

We believe it is now time to propose a comprehensive and coherent city-wide tall buildings policy for the capital. We maintain that such a policy could urgently address some of the damage that has already been caused by irresponsible and inappropriate tall building development and could also prevent similar instances from reoccurring in the future.

Furthermore, we propose that the government establishes a national tall buildings policy framework, informed by the structure of London's policy, to ensure that other cities that have felt similar tall buildings pressure - such as Manchester, Birmingham, Liverpool and Norwich - are better able to reconcile tall building developments within their existing urban and heritage contexts. We believe such a policy might have helped Liverpool retain the World Heritage Site listing it was stripped of in the summer. While we appreciate tall buildings are uniquely sensitive to local issues, we believe some sort of national guidance framework, based on London's pilot model, could be invaluable in inserting clarity and precision into a tall buildings planning process that frequently lacks either.

It is of utmost importance to note that such a tall building policy will

not be designed to suppress or ban tall buildings from the capital, for good or ill they are now part of the city's architectural lexicon. But it would seek to discourage the indiscriminate and haphazard development of tall buildings we have seen across the city and offer a coherent policy framework that ensures they are routinely sensitively located and designed to the highest architectural quality – aspects that have been sorely lacking from their development thus far.

In calling for such a policy, Policy Exchange will not be the first body to do so. Several renowned individuals and organisations, similarly alarmed at the scale of transformation London was being subjected to, have also urged either central or city government to implement such a policy in recent years. These include journalist Sir Simon Jenkins and critic Rowan Moore. Additionally, in 2016, an open letter compiled by Loyd Grossman, Chairman of the Heritage Alliance, Sir Laurie Magnus, Chairman of Historic England and celebrated architect and urbanist Sir Terry Farrell called for a clearer strategy on tall buildings in London.

This proposal would also fit into a wider broadening of the Building Beautiful programme to focus on topics other than housing. Housing is obviously relevant to tall buildings as much of the recent generation of high-rises has been built for residential purposes. But as tall buildings can embrace a variety of usages, the proposals would offer an invaluable opportunity to both test and extend the principles that underpin Building Beautiful into new policy areas and building typologies.

Our call for a London tall buildings policy is based on the eight core arguments below. It is also strongly vindicated by the results of major polling we conducted in December 2021 that revealed an extraordinary level of dissatisfaction with the impact tall buildings have had on London and immense frustration at the perceived lack of democratic consultation the public feel they have been afforded regarding their development. The arguments and the polling results are itemised below. The polling was conducted between 2 and 5 December 2021 and 1,859 UK adults from both London and outside London were polled.

I. Design Argument

41%

believe tall buildings have made London's skyline worse. 25% believe it has been improved.

43%

believe tall buildings have rendered the view from Waterloo Bridge less beautiful than it was 20 years ago. 23% claim it has been improved.

Few people would argue that London has been rendered more beautiful over the last few years by the explosion of tall buildings. Equally - with the possible exception of the Gherkin and the Shard - very few of London's new tall buildings have been celebrated as noteworthy pieces of architecture in themselves. In fact the opposite has often been the case with schemes like the Walkie Talkie winning the Carbuncle Cup and Nine Elms being widely pilloried for its lack of design quality. Critic Rowan Moore has referred to high-rise developments in Blackfriars and Battersea as "meretricious junk". A tall buildings policy would deploy core Building Beautiful principles to ensure that tall buildings would only be permitted in the specific instances where they embody the highest architectural quality and genuinely enhance urban character, tests that today's loose and ambiguous tall buildings planning framework rarely compels tall buildings to meet.

II. Planning Argument

56%

believe there should be new planning regulations to more effectively control the development of tall buildings.

40%

believe current planning regulations have done a poor job of controlling high-rise development. Just 31% believe they have done well.

London's recent history of tall buildings is riddled with inconsistency and failure: failure of the planning system to adequately constrain the opportunistic excess of high-rise commercial development and a planning system that is repeatedly inconsistent when it comes to applying what loose tall building regulations London currently has. For instance, while Salesforce Tower, the Walkie Talkie and the now vanquished Tulip observation tower were subject to planning inquiries due to their height, the taller adjacent 22 Bishopsgate and One Undershaft schemes were not.

Equally, because each borough is encouraged to develop their own skyline policy, the lack of a unified high-rise vision for London often means that boroughs object to other boroughs pursuing schemes they perceive to be harmful while often proposing similar developments themselves within their own boundaries. Finally, the inadequacies of the protection afforded to London's key historic monuments by the London View Management Framework were brutally exposed by the infamous incursion of a Stratford skyscraper onto a supposedly protected 300-year old view of St. Paul's Cathedral from Richmond Park. The cumulative result of all these inconsistencies is that the planning process for tall buildings in London lacks clarity and precision, is perpetually hamstrung by profligate public inquiries and wastes considerable amounts of time, money and energy for little civic gain.

III. Heritage Argument

71%

believe tall buildings should not be allowed to interfere with historic views.

65%

believe tall buildings should not be permitted in historic areas.

48%

believe historic buildings and areas are not given adequate protection from high-rise development. 29% believe they are.

45%

believe tall buildings have worsened the historic character of London. 29% believe they have improved it.

London's recent history of tall buildings is riddled with inconsistency and failure. Failure of the planning system to adequately constrain the opportunistic excess of high-rise commercial development and a planning system that is repeatedly inconsistent when it comes to applying what loose tall building regulations London currently has. For instance, while Salesforce Tower, the Walkie Talkie and the now vanquished Tulip observation tower were subject to planning inquiries due to their height, the taller adjacent 22 Bishopsgate and One Undershaft schemes were not.

Equally, because each borough is encouraged to develop their own skyline policy, much pressure has been heaped on the setting of London's historic fabric and key heritage assets by the recent explosion of high-rises. Conservation areas, ostensibly charged with protecting the character of areas of special historic significance, have proved ill-equipped to do so with scores of them either having their rules circumvented to force them to play host to tall buildings (i.e. the Walkie Talkie) or having to watch helplessly as their streetscapes are compromised by incursion of views of new tall buildings located elsewhere. The setting of countless historic landmarks from Marble Arch to Buckingham Palace has also been undermined by tall buildings that have been able to artfully sidestep the

London View Management Framework.

The recent loss of Liverpool's UNESCO World Heritage Listing status, partially on the grounds of inappropriate high-rise development, savagely exposes how vulnerable heritage assets are to harm and violation if not adequately protected. While London is a modern and dynamic city, its heritage is a major part of its reputational character and appeal and a method needs to be found to promote new tall development in a manner that does not dilute its core historic identity. The thrill of contrast is often used to justify the mix of old and new in London and render London unique from its historic peers. There is of course a role for contrast but it must never be used as a Trojan horse for chaos.

IV. Urban Argument

70%

believe it is important for tall buildings to fit in with their surroundings.

40%

believe it is important to arrange tall buildings in clusters rather than locate them indiscriminately. 35% believe the opposite.

48%

do not believe that tall buildings should be permitted in suburban areas. 30% believe they should be allowed.

Placemaking has rightly leapt up the design and policy agenda in recent years but there has been no commensurate evidential increase in tall buildings becoming more contextually sympathetic or achieving more successful reconciliation with their urban surroundings. In fact, with tall buildings often now a feature of low-rise suburban contexts and emerging in solitary isolation rather than organised clusters, very much the opposite has been the case. This has caused severe harm to London's underlying urban character, a character historically based on that of a low to mid-rise European city rather than a high-rise American one. Consequently, many of the attendant urban harms that accompany this dilution of character, such as the erosion of views, skyline and streetscapes, has been witnessed in London. There is an argument that says that any tall building control at this late stage after so much damage has already been done is like shutting the stable door after the horse has bolted. But this is too defeatist. Instead, London must take care to ensure that the urban qualities of intimacy, domesticity and charm that render its property market so lucrative in the first place are not fatally compromised by the very towers that market attracts.

V. Democratic Argument

64%

believe they have not been allowed an adequate say in whether tall buildings should be permitted.

64%

believe they should have a significant say in whether tall buildings are permitted.

Polling has consistently proven that Londoners feel ostracised from the tall buildings decision-making process. They are right, beyond the limited and perfunctory formality of public consultation (largely irrelevant in the City of London which houses very few residents) Londoners have had virtually no opportunity to meaningfully offer their consent (or otherwise) to the wave of tall buildings that have transformed their city. If the inverse of what has happened in London were inflicted on a New York or Chicago - namely they were forced to shift from a high-rise city to a low or mid-rise one in a fundamental reassessment of their core urban and historical identity - it is unthinkable that this would have been allowed to proceed without some sort of public notification being issued or consent being sought. In London this represents a serious democratic deficit that any new policy must seek to address. While there may be few precedents for consultation of this nature and on this scale, it is essential that a workable methodology is found in order to ensure that communities remain emotionally invested in their city and are empowered and incentivised to improve it. This is very much in line with supposed government thinking around the new planning bill as well as Building Beautiful founding principles.

VI. Economic Argument

11%

believe tall buildings have significantly improved housing availability in the UK. 43% believe they have either marginally or not improved it.

Tall buildings are notoriously expensive to build and often inefficient to run so their development is commonly taken as a sign of economic buoyancy and confidence. It is easy to see why they are popular with developers, even a small site, spread over multiple floors, can optimise space and maximise lettable returns. Consequently, within an office context, tall buildings have been identified as being crucial to London retaining its leading global financial status and this is certainly the justification that the City of London uses for its enthusiastic proliferation of them. However, the pandemic has emptied offices across the world and in London, an office market whose disproportionately high reliance on speculative development can see sub-optimal office occupancy rates even in boom times, the occupancy rates are still at only approximately 16%. The future could see a fundamental reassessment in the feasibility of the traditional office tower.

Housing presents similar challenges for the tall buildings sector. The vast majority of tall buildings built and proposed in London outside the City of London and Canary Wharf have been for residential not commercial purposes and we are often told that these are vital to enable London to address its housing shortage. Yet not only have tall buildings proved singularly and spectacularly unsuccessful in ending the housing crisis they have done nothing to lower the house prices that drive it. Even worse, there is even now evidence of the same oversupply in housing that has afflicted the office market with the £3bn Nine Elms Square development in Battersea only selling 90 of its 1,900 flats in two years. A tall buildings policy may be able to regulate either over- or under-supply of tall buildings by delivering a more holistic viability assessment process based on more than just economics alone.

VII. Environmental Argument

The recent decision of the Secretary of State to reject plans for the Tulip observation tower in the City of London surprised many not least for the fact that as well as heritage concerns being justifiably cited, so too were environmental ones. Specifically, the vast amounts of concrete required for the lift shafts and foundations were deemed “unsustainable”. On one level this justification is baffling and fits comfortably into the canon of illogical inconsistency that sadly characterises London tall building planning decisions. All tall buildings require vast amounts of concrete, as do airports, hospitals and roads. Is the government suggesting that all these structures are now unsustainable and thereby untenable?

One suspects the Secretary of State might have been employing environmental convenience to fortify architectural concern but regardless, as the first high-profile high-rise proposal refused permission on sustainability grounds, the Tulip potentially marks a new era where the sustainability performance of tall buildings plays a more rigorous role in the assessment of their viability. The fact that many tall buildings already perform poorly with regard to issues like energy consumption - overheating due to glass envelopes and wind-tunnel effects at their base - means that any tall building policy would need to closely scrutinise this area.

VIII. International Argument

London is not alone in the challenge of how to reconcile tall buildings within its prevailing historic context, even if prior irresponsibility means that the scale of London's challenge is greater than most. Many cities, including Paris and St. Petersburg, are facing exactly the same development pressures. London can perhaps learn from other cities with tall building policies in place that seem to have achieved the right balance between height and heritage. Equally, were a city of London's immense size and reputational pull able to formulate an effective tall buildings policy it could become a template for other historic cities around the world. And for that matter in the UK. Finally, a tall buildings policy would ensure that tall buildings inflict no further harm to London's traditional international reputation as a low- to mid-rise city whose charm rests in its unique ability to distil mass urbanism into a more intimate, domesticated and human scale.



£10.00
ISBN: 978-1-913459-84-0

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