

**Interim strategic planning guidance
on tall buildings, strategic views
and the skyline in London**

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Foreword

By Ken Livingstone, Mayor of London

I am publishing this interim strategic planning guidance to set out clearly my proposals for a policy on tall buildings in London.

In due course, I will publish my draft London Plan, which will contain detailed draft policy. For this purpose, I have engaged the services of DEGW to carry out research and advise me of policy choices. My team and I will be conducting further consultation with stakeholders as part of this policy development over the coming months.

In October 2000, I published a statement of interim planning guidance, including a position statement on tall buildings as follows:

"I support high buildings, both as clusters (such as in the City, Canary Wharf and Croydon), and as stand-alone buildings (such as the Post Office Tower and Millbank Tower), where they are in close proximity to a major public transport interchanges and contribute to the quality of London's environment. I have no objection in principle to London having the tallest of buildings."

In May 2001, I published for consultation 'Towards the London Plan', which set out my proposals for policy directions for the future development of London and included the following statement:

"High buildings can have a significant impact both on their immediate surroundings and on skylines and views across London. High buildings are often flagship developments that play an important part in regeneration, and they are likely to be relevant to the master planning of areas with good public transport access and capacity. A review of strategic policy relating to high buildings, including their role in maximising the density of development and their potential impact on strategic views, is being undertaken by the GLA as part of the preparation of the London Plan."

Initial consultation responses to 'Towards the London Plan' showed general support for my approach in that nearly twice as many people think that the encouragement of high buildings is important than those who do not.

Today, I set out in more detailed policy guidelines that will form the basis of the draft tall buildings policy, to be set out in the draft London Plan early next year. This policy will be subject to public consultation and will be examined in public by a government appointed panel late in 2002. In the interim period, I will consider proposals for tall buildings in the context set out here.

This of all my proposed planning policies has attracted the most interest from the media and from other interested parties – particularly those who wish to object to my views – or misrepresent them as a dire threat to life as we know it. Some objectors have claimed that my policies would allow us to recreate Manhattan in London, or turn Hyde Park into Central Park, with a ring of tall buildings all around. These are false claims. Policies will remain in place to protect conservation areas and strategic views although I am reviewing these policies to ensure they are not over-restrictive. In actual fact, I expect a very limited number of very tall buildings to be constructed during the next decade – probably only 10-15 in all, which are likely to be located in the City of London and fringes and further East, primarily at the Isle of Dogs. I have no intention to recreate Manhattan here; I want London to flourish as London – a unique exciting and truly global city.

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Recently, there has been enhanced media and public interest in tall buildings following the terrorist attacks on the World Trade Center in New York. Some have claimed that as a result of these attacks, no new tall buildings should be built in an attempt to protect London and Londoners.

I do believe that lessons can be learnt in the wake of these attacks, for example about the structural integrity, fire prevention measures and evacuation arrangements for tall buildings – and all other buildings where large numbers of people congregate. However, during the next 15 years London – and the UK – face the real possibility of London's competitiveness being undermined by the lack of affordable office space of all types and other factors set out in 'Towards the London Plan'. This could result in London losing out on its world city status as the only global competitor to New York and Tokyo and as the European centre for financial and business services.

I do not believe that recent events will stem the demand for tall buildings in London as we work during the next 15 years to build the office space and other infrastructure that is needed to increase London's competitiveness. To allow that to happen would be a mistake. London must continue to grow and maintain its global pre-eminence in Europe. London must continue to reach for the skies.

A handwritten signature in black ink that reads "Ken Livingstone". The signature is written in a cursive style with a stylized flourish at the end of the name.

1 Introduction

After a decade or so during which proposals for very tall buildings in London were few and far between, there has been renewed interest in the subject. A number of proposals are being floated for office, residential and hotel towers in various locations throughout the capital. Some of these already have planning permission. Planning applications have been submitted for other towers. Other proposals are in the public domain. Yet more are in the pipeline, but not yet in the public domain. Most significantly, a public inquiry into the proposed Heron Tower in Bishopsgate will take place in October and November 2001, following a Government call-in.

This interest in tall buildings has increased since May 2000 following the declaration by the newly elected Mayor of London, Ken Livingstone that he is broadly in favour of tall buildings in appropriate locations. The Mayor is due to publish a spatial development strategy in 2003 (the 'London Plan'), and this will include his policies for tall buildings, strategic views and the skyline. He has commissioned DEGW to produce recommendations for his new policy. Draft policy proposals will be published in 2002 for consultation. Until then, both the Mayor and local planning authorities have to judge proposals in the context of ten strategic views designated by the Government in 1991, and strategic planning advice agreed by the London Planning Advisory Committee in May 1999. Whilst the LPAC advice is adequate for most purposes, it does not always reflect the Mayor's thinking on the subject, and is interpreted and used differently by other organisations. In order to give greater certainty to those concerned, including landowners, developers, architects, local residents, amenity societies and the relevant agencies, the Mayor issues this interim strategic planning guidance for use in the development control process up to publication of the draft London Plan in 2002. The guidance set out here will not, however, preclude the inclusion of additional or different policies in the London Plan; nor should any statement here be taken to mean that it will necessarily be included as a policy in the London Plan.

2 Background

In its *'Strategic Guidance for London Planning Authorities'* (Regional Planning Guidance 3, May 1996), the Government asked the London Planning Advisory Committee¹ to prepare supplementary strategic planning advice on high buildings, skylines and strategic views. LPAC and various partners² commissioned in-depth research³ on this, which was published as *'High Buildings and Strategic Views in London'* in April 1998. In March 1999 LPAC agreed its supplementary *'Strategic Planning Advice on High Buildings and Strategic Views in London'*. In November 1999 the Minister for Housing and Planning, Nick Raynsford, endorsed the LPAC Advice as one of the building blocks for the Mayor of London's first Spatial Development Strategy⁴. He also intended his statement to ensure that the policies and principles concerned were taken into account by borough councils in revising their unitary development plans, and as a material consideration in relevant planning applications.

In October 2000, soon after taking office, the Mayor expanded on statements made during the election, and announced that he supported high buildings, both as clusters (such as in the City, Canary Wharf and Croydon), and as stand-alone buildings (such as the Post Office Tower and Millbank Tower), where they contribute to the quality of London's environment. He had no objection in principle to London having the tallest of buildings.

Since then, strategic policy has been tested by several planning applications for tall buildings, including the London Bridge Tower (310m), the 'Heron Tower' (183m) at 110 Bishopsgate, the 'Pinnacle' (119m) at Chiswick, Railtrack's redevelopment proposal (120m) at Paddington Station, the Seager Distillery development (80m) in Deptford, the London Tower (107m) at Bankside, and twin towers (130 and 91m) at Lots Road Power Station. Meanwhile, several tall towers with old planning permissions have been, or are being, implemented at Canary Wharf.

Most of these proposals have been - or will be - referred to the Mayor under the terms of the Greater London Authority (Mayor of London) Order 2000. In considering these proposals, the Mayor has applied the policies agreed by LPAC and approved by the Government in the context of his own stated policy (i.e. his policy statement of October 2000 and 'Towards the London Plan'). Nevertheless, there has been considerable misunderstanding about the intentions of the tall buildings policy, particularly the meaning of the consultation height thresholds, the impact on important landmarks, the importance of backdrops to strategic views, and the significance of LPAC's proposed *'important local views, panoramas and prospects'*. This misunderstanding will be removed by the publication of the draft London Plan in 2002.

It is not the Mayor's intention however to hold up development until then on the grounds of prematurity. Interim strategic planning guidance is therefore set out here to guide development control until the draft London Plan is published. This interim guidance is based on the LPAC Advice, but includes the Mayor's more recent thinking on the matter, without precluding consultation on the details in due course, or the findings and recommendations of the DEGW research.

¹ LPAC was set up in 1986 by the Act which abolished the Greater London Council. It was the borough councils' statutory planning committee for London, and its main purpose was to advise the Government, the borough councils and other organisations on strategic planning and transport matters and major development proposals. It was abolished by the Greater London Authority Act 1999, and its staff and resources were assimilated into the GLA.

² LPAC with the Government Office for London, English Heritage, Corporation of London, City of Westminster, Royal Borough of Kensington & Chelsea, London Boroughs of Camden and Croydon and the London Docklands Development Corporation, with the support of the Royal Fine Arts Commission.

³ By Building Design Partnership, London Property Research, London Research Centre, and Ziona Strelitz Associates.

⁴ Statement in response to a Parliamentary Question, 10 November 1999.

In particular, the Mayor wishes to set out at this time his support for the positive benefits of tall buildings to safeguarding and enhancing London's 'World City' role through:

- Maintaining a supply of top quality floorspace.
- The advantages that clusters of tall buildings can bring to London's skyline.
- The benefits in certain circumstances of free-standing tall buildings, especially in promoting regeneration and in identifying important locations.
- The advantages of locating significant concentrations of new office floorspace close to existing public transport infrastructure.

He also wishes to stress that the highest architectural quality is an essential requirement in adding to London's stock of beautiful buildings; in achieving exemplary public environments at ground level; and in delivering sustainable buildings that meet the most demanding 'green' credentials. Furthermore, he wishes to express his continuing support for the conservation of the best of London's heritage, and in doing so to make clear what is meant by 'impact' - both positive and negative.

3 Policy guidelines

3.1 Consultation thresholds

The Greater London Authority (Mayor of London) Order 2000 requires local planning authorities in London to consult the Mayor on proposals for tall buildings that are 75 metres tall or more and in the City of London (except on Thames-side); 25 metres or more and in the Thames Policy Area (as defined in RPG3); and 30 metres or more elsewhere. These thresholds are taken from the LPAC Advice, which indicated that planning authorities should also consult adjacent boroughs, other boroughs visually affected, the Commission on Architecture and the Built Environment and English Heritage on proposals of the above-mentioned heights in the relevant parts of London, and that additionally the Port of London Authority should be consulted on proposals in the Thames Policy Area. A possible refinement of these consultation arrangements may be that there is no need for English Heritage to be consulted in cases where heritage issues are not at stake. With that possible exception, **the Mayor considers these arrangements to remain appropriate for consultation purposes, but for the sake of clarity reasserts that they do not imply height *limits*.**

3.2 The supply of offices in a world city

Introduction

Much has been said about the *need* for tall buildings in London. The research conducted for LPAC, using mid-1990s data, concluded that the office development pipeline could meet forecast needs in a variety of low and mid-rise buildings. This conclusion should not however be taken at face value, as it did not demonstrate that all potential office users would be willing to locate in the low and mid-rise buildings on offer at that time. As the research acknowledged, the issue of tall office buildings is *“first and foremost not one of economic need, but an issue of image, aesthetics, local public transport and servicing capacity”*.⁵

LPAC’s consultants found no evidence to support the *“strong body of opinion which argues that without state of the art high office towers, London’s image as an international commercial centre could suffer”*. The study failed, however, to fully distinguish between *need* and *demand*. The office market in London over the last year or so has indicated a significant *demand* for tall buildings, as evidenced by the rapid coming to fruition of Canary Wharf’s pipeline of extant planning permissions for tall buildings; the emergence of several new, additional aspirations for tall buildings there; proposals in places such as the A4/M4 ‘golden mile’ and at Paddington; and, most spectacularly, in the City itself and its fringes such as London Bridge. The market clearly indicates that Canary Wharf alone cannot meet the *demand* for office space in tall buildings at the present time. Furthermore, Canary Wharf does not have all the characteristics seen as essential or desirable for some commercial activities.

Background and justification

In strategic planning terms, the need to facilitate major growth in the supply of high quality office floorspace is demonstrated by recent research into office occupancy costs in London

⁵ *‘High Buildings and Strategic Views in London’* (BDP, LPR, LRC and ZSA for LPAC and others, April 1998), paragraph 3.33.

compared to the world's top ten cities and other European cities.⁶ London is the world's most expensive city, at US\$1,455 per square metre. This is almost twice the next most expensive European city, Paris, at US\$776. Frankfurt and Berlin are US\$512 and US\$323 respectively. Globally, only Tokyo (US\$1,441) and Hong Kong (US\$1,149) compare with London. New York, at US\$722, is even cheaper than Paris. As pointed out in the Mayor's emerging spatial development strategy⁷, office availability in central London almost halved between 1995 and 1999, with costs rising, which in turn affected business competitiveness. Without new office space, rents will continue to rise, which will impact on the profitability of London-based businesses. 'Towards the London Plan' recognises a need to ensure that the future growth of office space is adequate to accommodate and enable the necessary growth. Tall office buildings will play an important role in doing this.

The business and financial service sector in London now accounts for 6.6% of UK GDP⁸ – one of the most important UK economic concentrations. In terms of jobs, forecast projections for increased business and financial service employment in London to 2016 are 300,000 to 500,000⁹. Much of this growth will have to be accommodated in central London in established economic and business clusters. Given the many constraints on development in central London, the implication is that tall buildings will be needed, wherever they are possible, to ensure that this growth is not constrained.

For over 800 years St. Paul's Cathedral, in either its Norman/Gothic or Classical form, was London's biggest and tallest building. London would be unthinkable without it. Yet in the purely functional sense there is no actual *need* for it. The activities for which it was built could be carried out just as efficiently in a far more modest building. The point is that there is a *demand* for it as spiritual inspiration, an architectural icon and a tourist destination. It is felt that the activities for which it was built are enhanced *spiritually* by an outstanding architectural expression that considerations of mere efficiency and cost could never deliver. For various reasons, some of those whose business it is to provide office floorspace find it advantageous to attract tenants by providing that floorspace in tall buildings of outstanding quality in certain locations.

Cities such as Paris, Rome, Venice, Vienna, Prague and St. Petersburg are often cited as evidence that there is no need for tall buildings, at least in the historic city centres. Paris is nearest to London in world city terms and now protects its historic skyline by banishing modern offices, especially tall buildings, to peripheral locations such as La Défense. Tall buildings in such historic cities are, of course, unthinkable, as demonstrated by Paris's disastrous flirtation in the 1960s with the 200 metres tall Tour Montparnasse. Only an icon such as Notre Dame or the Eiffel Tower is acceptable. But these cities pay an economic price for their largely heritage-based policies. They can beat London in the 'city as a museum' stakes, but are not in the same league in the international financial, insurance, trading, banking, insurance and legal markets.

What London can offer that its competitors cannot is the widest range of office types, in many different locations, at different heights, in various architectural styles, and with a range of rents. London also offers the English language; unrivalled international communications; a peaceful and multicultural population; excellent schools, hospitals and universities; a huge range of house types; unparalleled cultural and leisure opportunities; and the ability to react quickly to changing market circumstances. These are the attributes that enable London to attract

⁶ 'Office Trends', Healey & Baker, May 2001.

⁷ 'Towards the London Plan – Initial Proposals for the Mayor's Spatial Development Strategy', GLA, May 2001.

⁸ Based on a calculation taken from ONS regional accounts 1999

⁹ Based on a range of projections from established economic consultants being used to inform the draft London Plan

investment against the strong charms of its more rigidly planned and controlled European competitors.

Alone of European cities, London also competes with New York and Tokyo as an equal world city, and needs to meet a wide range of requirements for the highest quality floorspace. In international terms, this can mean a Georgian front door in Berkeley Square or a single building of one million square feet with 40,000 sq.ft. floorplates in Canary Wharf; but it also means buildings of great prestige in the City and its environs, and in locations associated with, for example, transport connections to Heathrow Airport.

There is no single answer to the provision of offices in London, and London's chief advantage is that it can provide a wider range of solutions than any other European city. It is essential for the health of London's economy that it continues to do so. No-one pretends that all businesses demand to be at least 200 metres up in the sky and at prime locations. Most offices will continue to be relatively low, and will be scattered across central London and elsewhere. But at the upper end of the market there are companies that demand to locate in prime locations, particularly the City - the traditional heart of London's financial activities for nearly a thousand years. Some of them want to be in tall buildings.

Opportunities for new office buildings in central London are severely constrained by conservation areas, listed buildings, underground services, designated strategic views, and (in the City) locally protected views of St. Paul's Cathedral and the Monument. The Tower of London, a World Heritage Site, also imposes constraints. In the 1980s the City was fortunate that the closure of Broad Street Station and the availability of air rights over Liverpool Street Station provided a unique opportunity to provide over 4.5 million square feet of high quality office floorspace in a single, ground-hugging development. There are no equivalent opportunities on the Broadgate scale in the City or City fringes at present, and locations further afield would need to be considered for additional developments of that kind. Furthermore, the supply of individual large sites for ground huggers, such as the former Plantation House, is increasingly limited by the need to protect the intimate, small scale street blocks, roads and lanes that are such an important feature of the City's character. Site assembly for low and medium rise developments of a million square feet or more could destroy this character. Redevelopment of post-war buildings may provide some opportunities for this scale of development; but if the City is to provide for those companies that need or demand to be in the City, and for whom Canary Wharf and other places are not acceptable or less acceptable, it must maximise the opportunities presented by the few remaining development sites where tall buildings are not precluded. The Baltic Exchange site, for example, could accommodate in a ground hugger only a half of the floorspace now under construction in the 180 metres high Swiss Re building. The Swiss Re company itself made it abundantly clear that its need for prestige made Norman Foster's spectacular 'gherkin' the only acceptable option.

Outside the City there are unlikely to be many opportunities for very tall office blocks in the West End, given the City of Westminster Council's opposition to tall buildings in most locations. Tall buildings of up to 100 metres might be possible at a few locations such as Paddington, but even at Victoria opportunities are limited. Some opportunities have been identified at places like London Bridge, but these are likely to contribute only a small proportion of London's eventual office floorspace. More distant and untraditional locations like Stratford may be able to support tall office buildings, and cater for different market segments, but such locations will not be able to replicate central London's functions, and in any case Stratford will have as its priority retail, housing and transport interchange uses.

Increasingly, the companies that are the prospective investors in London judge its offer on the basis of international comparisons. In some cases they expect to be in a tall office building, especially companies used to city centre locations in North America. Also, as a consequence of the recent cycle of company mergers, they need single buildings of between half and three-quarters of a million square feet, with the option of going up to and beyond a million or so in due course. Many demand to be in the historic City, to benefit from its connections and linkages, infrastructure, support services and status. It is no longer possible to provide sufficiently large buildings in the City in the form of low groundscrapers, even if that is what potential occupiers want. What they do want is quality buildings that can give them a sense of identity.

Policy guidelines

In *'Towards the London Plan'* the Mayor has placed London's world city functions firmly at the centre of his economic and spatial policies.

This means that the Mayor supports the provision of a continued supply of office floorspace in:

- **A wide range of locations including the City, specific central London fringe locations to the south and east, Canary Wharf, parts of Westminster, traditional suburban centres such as Croydon, and new locations such as Paddington and eventually Victoria, London Bridge and Waterloo.**
- **A wide range of building types, such as previously converted Georgian houses, Victorian and Edwardian offices, banks and trading houses; B1 business parks, and modern purpose-built office buildings offering several large trading floors, or large 40,000 sq.ft. floorplates, tall and thin floorplates of 7,000-11,000 sq.ft. or so, etc.**
- **Single office units of up to one million square feet or more, or buildings subdividable into smaller units.**
- **Floorspace in low rise, medium rise and high rise offices.**
- **Office rentals ranging from low cost units competing in price with other cities, to the very best, exclusive accommodation almost regardless of cost.**

3.3 High rise housing and hotels

Introduction

London already has over 2,000 tall buildings, and the large majority of these are residential. The system-built house building boom of the 1950s and 1960s was largely responsible, and the typical twenty storey public sector tower block of that time still suffers from a bad image problem. Physical problems such as poor ventilation, isolation and inadequate noise insulation contributed to this. The lack of control and surveillance led to vandalism and a lack of personal security. Typically, when the lifts worked, the thieves could get in; and when they didn't, elderly tenants couldn't get out. Insensitive management led to families with young children being inappropriately allocated to tower blocks. In some places, difficult tenants were concentrated into what became 'sink estates'.

Background and justification

In recent years there has been a renewed appreciation of the benefits of high rise living. Estate regeneration schemes have led to some towers being demolished, but others have been saved

by physical improvements and the installation of surveillance and porterage schemes. For many people - not just keen gardeners and people with young children - tower blocks will never be acceptable, but for others the advantages of modern living plus spectacular views are increasingly attractive. In the private sector, upper floors in tall residential buildings, especially along the River Thames, command higher rents and sale prices.

After decades of decline, London's population is growing, and a minimum of 23,000 extra homes are now needed each year for the period 2002-2011 (this is 227,106 new dwellings including conversions).¹⁰ The limited supply of brownfield land in London means that new residential development will have to be built at higher densities. Building tall is one way of achieving this. Although great height is not an essential ingredient of higher densities, it can provide a greater sense of space than lower developments. This will only work if tall residential buildings are located where there is good public transport; where they would not overshadow neighbours; where there is no need for additional amenity space; and where links to services and facilities can be made.

Just as London's resident population is growing, so is its demand for hotel bed spaces. The greatest demand seems to be at the middle and lower end of the market, which is best met by low and medium-rise buildings. At the upper end of the market, a room with a view can command higher prices. Although the number of high rise hotels is never likely to be significant compared to offices and flats, some operators will wish to exploit certain locational advantages by going high.

Policy guidelines

Proposals for new residential towers and hotels in appropriate locations, to help meet the demand for high rise living by both residents and visitors, will be supported in principle.

3.4 London's character and the location of tall buildings

Introduction

The Government's 1996 Strategic Guidance asked local planning authorities in their UDPs to identify areas which are considered either appropriate or inappropriate for high buildings. This has not been carried forward uniformly across London. Indeed, some borough councils have blanket bans on tall buildings, such as Islington's borough-wide ban on all buildings over thirty metres tall. The lack of detailed justification for such policies, and the difficulties involved in carrying out the kind of detailed, borough-wide study of urban character needed to justify designating land as acceptable, unacceptable, or even 'sensitive', led LPAC to a simpler approach. Borough councils were asked to identify only areas *appropriate* for tall buildings, and criteria were set out to assist councils in their assessments. LPAC noted that: "*High buildings can mark or draw attention to locations of civic or visual importance such as town centres and major public transport interchanges. High buildings can also contribute to an interesting skyline when grouped together.....High buildings can also have a positive functional effect in giving focus, momentum and publicity to areas undergoing regeneration.....High buildings can also form objectives of long distance views Tall buildings, whether singly or in groups, can provide long distance orientation points*".¹¹ LPAC listed types of particularly sensitive areas, such as

¹⁰ See PPG3 Planning Policy Guidance 3, 'Housing'; and 'Towards the London Plan'.

¹¹ 'Strategic Planning Advice on High Buildings and Strategic Views in London', LPAC 1999, paragraph 4.1.

listed buildings, conservation areas and world heritage sites, strategic views and open spaces, which should be born in mind in identifying appropriate areas. LPAC also listed functional considerations, such as aircraft paths, telecommunications channels, microclimate and daylight.

Background and justification

The locational criteria set out by LPAC remain valid today. English Heritage's recent listing of Centre Point, Millbank Tower, New Zealand House, the Barbican towers and Trellick Tower is evidence that in the right location, and of the right quality, solitary tower blocks can make a lasting and positive impact on the general environment and on London's character, worth preserving for future generations to enjoy. They, and other tall buildings such as the Euston Tower, Post Office Tower, Hilton Hotel, Shell Centre, Empress State Building and Archway Tower provide markers and orientation features across London's sprawl (even if not all are of high architectural quality).

The value of clusters of tall buildings from an urban design point of view has been widely recognised. There are other benefits. Businesses in the financial sector tend to cluster together so as to concentrate sufficient activity to support ancillary activities, ranging from associated commercial activities such as printing, copying and office servicing, to leisure activities such as clubs, pubs, restaurants, shops, banks and health & fitness centres. For some business activities, solitary locations are unacceptable, and the club-like atmosphere of the City is one of its major attractions. Canary Wharf is beginning to acquire similar qualities.

More important than their role in specifying areas appropriate for tall buildings, LPAC's criteria were recommended for use in assessing the merits of individual tall buildings, whether within or without identified appropriate areas. LPAC also set out design criteria, such as the need to be *"of outstanding architectural quality"*, and to *"enhance the skyline...."*.

LPAC's promotion of the positive benefits of tall buildings is often overlooked. For example, LPAC argued that : *"Areas where a number of existing high buildings form a cluster should be considered for inclusion..."* (in areas where high buildings may be most appropriate) *"...given the positive visual effects of groups of high buildings and the reduction in negative impacts when a high building is added to an existing group"*. Nevertheless, LPAC's overall approach to the location of tall buildings was fundamentally cautious, resulting from a basically suspicious attitude to the impact of tall buildings, and leading to an underlying emphasis throughout on constraints and safeguards.

In this regard, the nature of London's character is often misunderstood. For some, London's character is all about old buildings - the accretion over a thousand years of layers of different types and styles of buildings, in groups or individually. They are valued for their architectural or historic qualities. For some, London's character is Georgian or Victorian; for others, it is derived from Portland stone and London stock bricks; or is tied to a general two-to six storey building height, or to narrow plot dimensions. All these approaches miss the point, which is that the fundamental quality of London's character is that it is always changing, taking risks, experimenting, and unafraid to mix uses, materials, styles, dimensions and heights. London is neither Georgian, Victorian, Edwardian, nor any historical character at all. New buildings should add to this continuing tradition of variety and cosmopolitan change in creating heritage for tomorrow.

Policy guidelines

The Mayor believes that the development of London in the 21st century needs to be adventurous, as in previous centuries - certainly as adventurous architecturally as the Victorians - and that proposals for tall buildings need to be considered for the positive qualities they can add to London's character, taking account of location, design and accessibility.

The Mayor supports in principle the clustering of tall buildings. The reassessment of existing policies being undertaken by DEGW will consider the impact of clusters, and the Mayor will subsequently consider urban design guidelines for clusters. Already the Mayor supports existing clusters in the City of London, Croydon Town Centre and Canary Wharf. Subject to the results of the current study, consideration will be given as to the appropriateness of other locations for new clusters such as the Paddington Goods Yard/Station/Basin area, Waterloo, Victoria and London Bridge.

With regard to the City cluster, and within the context of the LPAC location criteria, the Mayor will support the policy of the City Corporation to allow and encourage tall buildings within an area to the north and east of the Royal Exchange, bound approximately (but not precisely) by Old Broad Street, Houndsditch, Aldgate and Fenchurch Street. This area has been identified so as to afford the necessary protection for the setting of St. Paul's Cathedral and the Tower of London. It is a guide only, and proposals for sites within or beyond the boundary will be subject to the same tests as proposals elsewhere.

The Mayor supports a criteria-based approach to the assessment of planning applications for tall buildings, and for the time being he will use the LPAC criteria, but may develop additional criteria relating to the possible benefits of a tall building. These additional criteria might include:

- Contributing to a cluster.
- Marking or drawing attention to locations of civic or visual importance such as town centres and major public transport interchanges.
- Contributing to an interesting skyline when grouped together.
- Giving focus, momentum and publicity to areas undergoing regeneration.
- Forming objectives of long distance views.
- Providing long distance orientation points, whether singly or in groups.
- Creating new architectural icons for the new century.
- Generating confidence in London's future, both economically and aesthetically.

3.5 The quality of tall buildings

Introduction

All buildings should be of the highest possible architectural quality commensurate with their purpose and location. This is especially true of tall buildings, because of their wider impact. It will not be possible however, to secure permission for a beautiful tall building if it is the wrong place.

Background and justification

In advance of the London Plan the Mayor will continue to be particularly vigilant when assessing the architectural quality and urban design credentials of proposed tall buildings. In the London Plan, the Mayor will set out design criteria to ensure high quality architecture.

The Mayor's general policies on the built environment will apply to tall buildings as to all other buildings, such as the need to meet the most demanding 'green' credentials, to generate appropriate levels of community benefit, and to respect conservation area policies and the setting of listed buildings.

Policy guidelines

In the advance of publication of the draft London Plan, the Mayor will wish to see:

- **The ground levels to be largely accessible to the public.**
- **Elevations to be varied and interesting.**
- **The tops of tall buildings to be well articulated.**
- **Materials to be appropriate to their settings.**
- **The surrounding public realm to be capable of handling pedestrian movement.**
- **Wind impact to be within acceptable limits.**

3.6 The visual impact of tall buildings

Introduction

Because of their height, tall buildings have a greater visual impact on the skyline than lower buildings when seen from medium and long distances. This impact can be positive and beneficial, or negative and damaging. It can also be nondescript, almost invisible, or visible but not overly intrusive either way. Interesting or easily recognisable forms such as Big Ben, the London Eye and Centre Point are attractive and positive when seen from distance. Clusters of tall buildings can form particularly exciting and attractive skylines. London is not in competition with North American or Asian cities to achieve a single, dominant, clustered skyline, but views across central London's relatively low terrain are made more interesting by the existing clusters mentioned above, and by some of the single towers that pick out particular locations. From medium distances, the architectural detail of tall buildings becomes more apparent and therefore more relevant to judgements made about development proposals.

Background and justification

A well-proportioned tower with an interesting top and elevations can enhance the skyline and views, whether as part of a cluster, or standing alone. So far, London has not on the whole been fortunate in the quality of its tall buildings, but recent developments and proposals in the pipeline give cause to believe that London could, over the next decade or so, acquire some of the most beautiful tall buildings, thus adding greatly to the overall character of London and its attractiveness to residents and visitors.

Some tall buildings, however, are inherently ugly in any location, and others can cause damage by virtue of their location. Damage is caused by blocking the view of another great building from a significant viewpoint, or by appearing close behind it. Low buildings can often cause similar damage if badly sited. The setting of great buildings is especially sensitive when they are

seen in silhouette against the sky. In a dynamic city like London, historic buildings are often seen to advantage in close juxtaposition to buildings of different character, scale, materials and size. It will always be important, however, to ensure that views of St. Paul's Cathedral, Westminster Abbey, the Palace of Westminster and the Tower of London receive special consideration and, where necessary, special protection. In terms of towers directly *behind* historic set pieces, the impact of the Swiss Re building when seen from the viewpoint on Tower Bridge on the Tower of London (a World Heritage Site) demonstrates that such an impact can be acceptable in some circumstances, as confirmed by English Heritage.

London's historic buildings are generally small in scale, although buildings deliberately designed to dominate and overwhelm, such as St. Paul's Cathedral, the White Tower (at the Tower of London) and the Palace of Westminster, are huge in scale even compared to modern buildings. In the case of St. Paul's and the White Tower, their formerly unchallenged dominance has been changed by 19th and 20th century developments. They are now seen as elements of a complex and changing skyline, in a part of London where commercial interests have always predominated. The impact of new buildings on them needs to be judged with this in mind. It is the overall composition that needs to be assessed. Some particular settings may need to be given absolute protection from change but on the whole it is the juxtaposition and close interplay between buildings of different ages, styles, scale and materials that creates so much of London's magic.

In the case of the Palace of Westminster, tall buildings at Millbank and Vauxhall have partially changed its setting, but in the more immediate environs Big Ben, the Victoria Tower and Westminster Abbey still hold sway. There is one problem: the infamous Government slab blocks in Marsham Street, which offend many views from the River Thames. The proposals to demolish them will restore the setting of the historic Westminster group.

Tall buildings can be seen more readily from the River Thames, its banks and the larger open spaces than from elsewhere. Often, as in the listed Millbank Tower when seen from the River Thames, and the listed Post Office Tower when seen from Regent's Park, the experience is exciting and beneficial. The Royal Parks Agency and others have claimed that the Royal Parks give an illusion of countryside, of getting away from the city, and that tall buildings destroy this illusion and should not be allowed. The Mayor of London, however, believes that Londoners expect to see tall buildings, and can readily distinguish between the intense urban landscaping of the Royal Parks and real countryside. Londoners wanting a countryside experience can obtain it at the end of a short train journey, and there are thousands of acres of real countryside within the Greater London boundary. In the Royal Parks, where buildings were often deliberately located to provide an urban feel (such as in Regent's Park), well-designed buildings can provide useful orientation points, and objects of beauty and interest to look at. The real intrusion in London's parks is traffic and aircraft noise.

Policy guidelines

In considering proposals for tall buildings, the Mayor will encourage and support tall buildings that enhance London's changing skyline, subject to other strategic planning requirements being satisfied, but will oppose buildings that damage the setting of buildings of architectural or historic interest that are particularly sensitive to the impact of new adjacent buildings in certain views. Damage may be caused by new buildings blocking views of listed buildings, especially local views, or by filling in the skyline, but will not necessarily be caused by proximity itself, or by seeing the old and the new together.

3.7 Strategic views

Introduction

For over a decade, ten 'strategic views' of St. Paul's Cathedral and the Palace of Westminster have been protected from inappropriate development. This had its origins in research carried out for LPAC, English Heritage and the Government in 1988¹². The Government signposted its intention to issue guidance on the protection of strategic views in 1989¹³. The views were set out by the Government in 1991¹⁴, and were supported by detailed technical Directions for each view issued under the Town & Country Planning General Development Order 1988. The ten views are from Primrose Hill and Parliament Hill to both St. Paul's and Westminster; and from Kenwood, Alexandra Palace, Greenwich Park, Blackheath Point, Richmond Park (King Henry VIII's Mound) and Westminster Pier to St. Paul's. The Government rejected later requests by LPAC to include additional views from St. Paul's to Westminster and from Haverstock Hill to St. Paul's.

Only the Secretary of State can alter, delete or add strategic views, but the GLA Act gives the Mayor responsibility for existing policies on views, which will remain until replaced. The Mayor can make recommendations to the Secretary of State to alter, remove or add to these views.

Background and justification

Each view is described in detail such that they can be shown accurately on unitary development plans. The area of protection includes the direct line of sight from the viewpoint to the drum and dome of St. Paul's Cathedral and/or the Palace of Westminster, extending in the form of a 'cone of vision' up to a maximum of 300 metres on either side of the line of sight, including the backdrop to each view (i.e. the land behind the viewed object). In addition, for eight of the views, 'wider setting consultation areas' have been identified. Advice is given as how the height differentials of the viewpoints and the objects, and the curvature of the Earth, should be taken into account.

Within the protected cones, no buildings may be erected that would obstruct the view of St. Paul's Cathedral or the Palace of Westminster, or obscure the wider setting or backdrop. As most of the viewpoints are elevated, proposals for tall buildings are particularly at risk from the protected strategic views. Amongst the strategic locations affected that might otherwise be appropriate for tall buildings are the environs of Euston, King's Cross and London Bridge Stations. In the City of London, large areas with development potential are unavailable for tall buildings, and this restricts the City's ability to take full advantage of its location.

The value of these strategic views needs to be tested. It is not certain that visitors to the viewpoints are aware of the benefits of the view of St. Paul's Cathedral or the Palace of Westminster from such long distances; nor whether many people actually do notice them. St. Paul's and the Palace of Westminster are often obscured by high levels of pollution. It is possible that for many people it is the combined effect of all of central London's buildings that is of most value. The views from the northern and southern heights extend from Canary Wharf to the City and into Westminster, providing a spectacular panorama rather than narrow views of an individual building. It is possible that medium-range views of London's great buildings, both modern and historic, should be accorded greater importance.

¹² See footnote 5.

¹³ 'Strategic Planning Guidance for London', DoE, July 1989.

¹⁴ 'Supplementary Guidance for London on Strategic Views' (RPG3 Annex), DoE, 1991.

The Directions relating to the strategic views are highly technical, but their usefulness has not been examined. It might be that narrower cones of vision would offer adequate protection, or that the wider setting consultation areas and the backdrops are unnecessary.

Policy guidelines

The Mayor has commissioned a full review of the strategic views, and will introduce appropriate policies in the draft London Plan and may seek changes to the statutory Directions following consultation. In the meantime, the existing Directions will apply.

3.8 Other views

Introduction

In its advice on tall buildings, LPAC recognised that there are many other views in London that are cherished by Londoners and visitors.¹⁵ Indeed, the Government called upon borough councils to identify ‘important local views’ in their UDPs.¹⁶ LPAC acknowledged that it would not be possible to prepare protective planning measures as detailed and comprehensive as those included in the Directions for strategic views, but sought a degree of control through UDPs. LPAC proposed three categories.

- *‘Important local views’* are views of specific buildings from specific viewpoints. LPAC gave a number of examples, such as from the footbridge in St. James’s Park to Whitehall Court and Horseguards.
- *‘Important local panoramas’* are taken from specific viewpoints, but encompass broad vistas containing many objects of interest. Examples include the panoramas of different parts of central London from the high land around Sydenham.
- *‘Important local prospects’* are less specific in terms of both viewpoint and object, and often give 180° or wider views. Views in central London from bridges over the River Thames are given as examples.

Background and justification

Local views of St. Paul’s Cathedral from Waterloo Bridge, which is widely acknowledged as an important local prospect, and from the terrace of Somerset House, have been thoroughly examined in recent months, and the lessons learnt so far will assist in the review of other local views. Several factors are evident:

- Wherever possible, the object of the view, such as the drum and dome of St. Paul’s Cathedral, should be visible in local views against a neutral background.
- Views often change significantly as one moves around a viewpoint, such as the view from Waterloo Bridge.
- Views often encompass not only the main object, but also its environs. For example, the views from Waterloo Bridge encompass not only St. Paul’s but also the River Thames, its embankments, the emerging cluster of tall buildings in the financial centre of the City, the residential towers of the Barbican, the towers of Canary Wharf in the distance, and lower buildings and towers on the South Bank such as at London Bridge and Bankside.

¹⁵ Ibid, paragraph 7.1.

¹⁶ Ibid.

- Viewpoints sometimes offer a variety of views, and it is important to distinguish between the most relevant. For example, views from the terrace of Somerset House are predominantly southward over the River Thames, with the oblique view of St. Paul's Cathedral being obscured by the splendid plane trees on the Embankment (except when cut back by Westminster City Council).

Where buildings are set against the skyline, much consideration has been given to the extent of sky that it is necessary to protect around them, and to the impact of new tall buildings in their vicinity. As a general rule, a new tall building will not damage the setting of an historic building within an important view if clear sky remains on either side to retain the sense of an uncluttered backdrop. London's changing character, and its need to grow and compete, is such that taller buildings will inevitably crowd around historic buildings. In the City, this is particularly true of the core of commercial activities to the north and east of the Royal Exchange, and their effect on St. Paul's Cathedral. The existing building at Drapers Gardens is at present the closest tall building to St. Paul's when viewed from Waterloo Bridge, and when moving north across the bridge it gradually merges into the mass of the drum. The setting of St. Paul's Cathedral is therefore already compromised, and this is true of many other historic buildings. Fortunately, proposals may come forward to redevelop Drapers Gardens, but similar opportunities will be few and far between.

Tower 42 is much taller than Drapers Gardens, and is similar in height to the proposed office tower at 110 Bishopsgate (the 'Heron Tower'). The amount of sky between Tower 42 and St. Paul's is more than enough to present St. Paul's in its traditional setting. The Heron Tower will reduce the amount of sky but will still allow sufficient neutral background to St. Paul's to enable the views from Waterloo Bridge to continue to be enjoyed. It will have an impact by further reducing St. Paul's former isolation on the skyline, but by retaining sufficient space around the drum and dome, and by providing a high quality building to define a new edge to the space around St. Paul's, its impact will be beneficial. Other cases of development proposals having a potential effect on historic buildings set against the skyline will need to be considered on their merits, but the necessary analysis will need to take account of similar issues.

The view of St. Paul's from Waterloo Bridge would be an '*important local prospect*' in the LPAC classification, as there is no single viewpoint, rather a continuous viewpoint from the length of the Bridge. The juxtaposition of St. Paul's and other tall buildings would change as the observer moved across the Bridge. As stated above, at no point does the gap between the dome and existing or currently proposed towers close up to an unacceptable degree.

Policy guidelines

LPAC called on borough councils to identify important local views, panoramas and prospects. Twenty-one months later, there is little sign of boroughs doing this. **The Mayor believes that there are medium distance views of important buildings such as St. Paul's Cathedral that merit protection, especially from the possibly negative impact of tall buildings. His consultants will evaluate existing policies, and produce guidelines for other potential views. Borough councils should continue to identify important local views, panoramas and prospects, and should when doing so clearly show the viewing point, object, and extent and role of the view.**