



**Andrew Boff AM**  
**Chair of the Planning and Regeneration Committee**

2 September 2021

Dear councillor,

**Housing typologies investigation findings**

In Autumn 2020 the Planning and Regeneration Committee conducted an investigation into COVID-19, Housing Typologies and Design in London. A key emphasis was on housing density and the development of tall buildings for residential use in London.

As Chair of the Committee, I wanted to write directly to local councillors to share our findings from this investigation, which I hope you will find of interest and relevance to your work. This letter may have particular interest for those with planning responsibilities or those commenting on local planning applications.

This letter discusses the following issues:

- The costs of tall buildings
- Density
- The impact on families
- Quality of design
- Post-COVID 19

Our key finding is that **the Committee does not believe that tall buildings are the answer to London's housing needs and should not be encouraged outside of a few designated and carefully managed areas.**

*Background*

At our Committee meeting on 21 October 2020, we heard oral evidence from the following experts: Yolande Barnes, Chair of the Bartlett Real Estate Institute at University College London (UCL); Professor Philip Steadman, from the UCL Energy Institute; Matthew Carmona, Professor of Planning and Urban Design at The Bartlett School of Planning at UCL; Jo McCafferty, Director at Levitt

Bernstein; and Michael Ritchie, Place Shaping Team Leader at the London Borough of Tower Hamlets.

Our investigation also formed the basis of our response to the 'Good Quality Homes for All Londoners' Supplementary Planning Guidance (SPG) public consultation which closed in January 2021, in which we focused on the 'tower' housing type.

### *The costs of tall buildings*

During the Committee investigation, we heard about the relationship between high building density and building and maintenance costs, including how the whole life-cycle costs of tall buildings are not always fully considered at the development stage. Servicing tall buildings can be costly and this often results in high service charges to residents. High management costs and service charges often preclude affordable tenures, and well-designed family homes are harder to achieve as they are remote from shared amenity space. Jo McCafferty told us that there is a direct relationship between density, but specifically tall buildings and high cost. Drawing on the Tower Hamlets experience, Michael Ritchie reflected that tall buildings are a "*system and they need constant maintenance and they need to be efficiently run*".

Professor Philip Steadman told us about a study conducted by UCL<sup>1</sup> a couple of years ago into tall office buildings, mostly in London that found the increase in storeys from six storeys to 20 doubles the energy intensity per square metre. As set out in the Committee's subsequent SPG consultation response, energy use is higher in tall buildings, with electricity use twice as high due to increased solar gain, as well as other conditions prevalent at higher altitudes, including more wind and colder temperatures. The taller the building, the higher the amount of embodied energy required per useable square metre as low-carbon materials such as timber are not viable. Tall buildings also suffer more from heat loss for the same amount of insulation as lower buildings because of the higher wind speeds.

The Committee finds there is a growing evidence base demonstrating that tall buildings are less sustainable than those which provide a similar quantum of development in other configurations. The Committee advocates that the long term and lifetime costs associated with tall buildings should be carefully considered in development proposals. It particularly believes the development of towers should only happen after robust evidence has been presented about how their social impacts will be mitigated.

### *Density*

The Committee is of the view that proposals for tall buildings should be required to demonstrate that other building configurations, which would achieve similar densities, have been considered. During the investigation, Matthew Carmona indicated his view that up to a medium density of 56 dwellings per hectare better enables access to local facilities within a neighbourhood. The Committee has specific concerns relating to density, and has called on the Mayor to distinguish between high density and 'superdensity' (above 350 dwellings per hectare) in the final SPG. The Committee also

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<sup>1</sup> UCL Energy Unit's 'High-Rise Buildings: Energy and Density' project which ran from 2015-2017

<https://www.ucl.ac.uk/bartlett/energy/news/2017/jun/ucl-energy-high-rise-buildings-energy-and-density-research-project-results>

takes the view in general that bed spaces per hectare is the most appropriate way to measure density.

#### *The impact on families*

The Committee is concerned that while delivering higher densities may seemingly make more effective use of land, tall buildings will not produce the high-quality homes and neighbourhoods that London needs. During the investigation, Matthew Carmona said that “... *in general families are disadvantaged if they are living in tall buildings. The sociability that children are able to gain in terms of opportunities for play, for meeting others and so forth within tall buildings is often not great.*”

Furthermore, Jo McCafferty expressed that “*direct access to external space for families is absolutely crucial to the successful and healthy functioning of that household and that becomes incredibly difficult with tall buildings.*” She explained that a high-density, medium- to low-rise model can work more easily for families, enabling communal or individual gardens at lower storeys that are closer to individual family homes than tall buildings allow. She said “*There are lots of opportunities whether it is in higher-density development or even medium-density development where those opportunities with social spaces for children and children of all ages, in fact, to gather in small groups is really important.*”

Following research conducted within Tower Hamlets, Michael Ritchie reflected that opportunities to make other parts of buildings playable, as in the public realm around entrances, have been considered within the Tower Hamlets High Density Spatial Planning Document<sup>2</sup>. He commented that the tall buildings guidance in Toronto and other international examples had also informed the Borough’s design guidelines. Professor Steadman similarly described the case of San Francisco where there is a “*general limit on height of about 12 metres or four to five storeys*” and where a height limit is driving developers to “*find ingenious ways of achieving high density other than tall buildings.*”

Tall buildings tend to contain a majority of mainly studios and one- beds, and a proportion of two-bedroom flats, resulting in a lack of family-sized housing and poor use of space. The Committee has long advocated for more family-sized housing to be built in London but believes that family homes in tall buildings are only appropriate with certain design measures in place, for example access to amenity such as play space and suitable positioning within a development. The Committee is of the view that families should not be housed above the fifth floor in public housing, and that consideration should be given to design of access and surveillance of children’s play space and amenity space for children in relation to tall buildings. Overall, it believes that high density housing can be achieved by approaches that are more suitable for families, more in keeping with London’s traditional form, and are less intrusive on the skyline.

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<sup>2</sup> Tower Hamlets Borough Council, High Density Living Supplementary Planning Document, December 2020  
[https://www.towerhamlets.gov.uk/lgnl/planning\\_and\\_building\\_control/planning\\_policy\\_guidance/supplementary\\_guidance/supplementary\\_guidance.aspx](https://www.towerhamlets.gov.uk/lgnl/planning_and_building_control/planning_policy_guidance/supplementary_guidance/supplementary_guidance.aspx)

### *Quality of design*

In its investigation, the Committee heard about the importance of building mixed environments that combine different housing densities. Professor Yolande Barnes expressed that *“The characteristic and experience of a neighbourhood is a very complex thing. It has to do with street layouts, the space syntax... the global connectedness, right down to access to amenities, the ability to work from home, exercise, socialise and so forth.”* She conveyed that street design has a *“profound impact on (a) your ability to achieve mid-rise density and (b) how it is then experienced by people.”* Similarly, Michael Ritchie told us about the holistic nature of housing quality – the building, residential quality and contribution to surroundings. He commented that there *“should be standards, metrics and things that we can measure, but it is also how all these things work together to produce a place.”*

The Committee also heard comments about the contribution of Design Review Panels, such as Urban Design London (UDL)<sup>3</sup> and Mayor’s [Design] Advocates<sup>4</sup>. It was the opinion of Matthew Carmona that *“The huge success in London has been design review and the spread of design review over the last 10 years with increasingly more professionally run panels in local authorities giving advice to planning authorities.”* He also drew attention to the Place Alliance’s<sup>5</sup> ‘Home Comforts’ report<sup>6</sup>, published in October 2020. Based on a nationwide survey of 2,500 households, it found a link between “lack of comfort” and the age of the property. The newer the home, the less comfortable it was found to be. He told the Committee the same survey found: *“Those in social housing tended to be less comfortable than those in private or private rental. Also, the higher you got off the ground, the less comfortable you were in terms of your living environment and your happiness with your neighbourhood.”* While Jo McCafferty advocated the importance of amenity space being directly connected to living space and being *“big enough, robust and have the right outlook and orientation”*, including ‘acoustic privacy’ between and within homes.

### *Post-COVID 19*

During the investigation, reference was made to housing standards in the light of the potential changing context post-COVID 19, which the Committee also addressed in its consultation response. Professor Philip Steadman commented that *“One of the interesting things that is going on at the moment with COVID is how the use of the existing stock is being transformed by people working from home, by offices being emptied, by people planning to move out.”* Jo McCafferty highlighted that creating flexibility in housing design will be an important post-COVID 19 response. Although Michael Ritchie warned against a *“kneejerk reaction to design a new world based on COVID-19”*, Matthew Carmona said *“our homes have to cater for a lot more different functions than they did in the past, particularly space for many of us to work at home, either full-time or part-time. That is something that we certainly need to be thinking about in London.”* The Committee believes the pandemic and the lockdowns that resulted have highlighted the critical importance of access to greenspace, private outdoor space, outdoor play space, and adaptability needed for home working.

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<sup>3</sup> Urban Design London (UDL) [www.urbandesignlondon.com](http://www.urbandesignlondon.com)

<sup>4</sup> Mayor’s Design Advocates and Advocate Organisations <https://www.london.gov.uk/what-we-do/regeneration/advice-and-guidance/about-good-growth-design/mayors-design-advocates>

<sup>5</sup> The Place Alliance is Chaired by Professor Matthew Carmona and hosted by UCL Bartlett School of Planning. It increasingly has a campaigning role and *“provides a forum for its supporters to come together, debate and work towards raising the national consciousness regarding the importance of place quality”* <http://placealliance.org.uk/about-us/>

<sup>6</sup> UCL, Place Alliance Launches New Report: Home Comforts 28 October 2020 <https://www.ucl.ac.uk/bartlett/planning/news/2020/oct/place-alliance-launches-new-report-home-comforts>

Overall, the performance of tall buildings should be considered against the standards relating to diversity and housing mix, and whether or not tall buildings are suited to meet London's diverse housing needs, particularly in respect of family and affordable housing and creating inclusive communities.

We hope that these findings may be of use to you in your role as councillor. I would be very happy to discuss our investigation and findings with you in more detail, should that be of interest.

Yours,

A handwritten signature in black ink, appearing to read 'Andrew Boff', written in a cursive style.

**Andrew Boff AM**

**Chair of the Planning and Regeneration Committee**