

Chapter 3: Design

This chapter of the Plan collects together various policies on design of big schemes, other new developments, density, individual buildings including housing space and performance standards, safety issues and circular economy principles in design.

D1 London's form and characteristics

This set of policies comprises general advice on what places should be like. It fails to deal with participation in design processes and omits references to London's overall structure or the move towards more local self-sufficiency. The importance of sunlight in public spaces, schools, homes etc is mentioned only in supporting text.

Just Space response:

D1 A 7 "provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity"

Add: in such a way that each enjoys sunlight throughout the year, at least in places.

D1 A 8 "encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area."

Just Space addition: **Foster the availability of commercial and public services within convenient distances from homes and jobs in line with policy SD7F and to reduce the need to travel.**

D1 B Just Space addition: **(7) demonstrate the community engagement process undertaken and how it has influenced the design.**

§3.1.11 and 12 Text emphasising London's Circular Economy Route Map is very welcome. It should be strongly reflected in policy, however, by strengthening...

D1 B 3: "aim for high sustainability standards"

Just Space addition: **and follow the guidance in London's Circular Economy Route Map. A priority should be on the retention and upgrading of existing building stocks unless there is strong evidence to support demolition / replacement.**

And in text the Mayor should commit himself to lobbying government for harmonisation of VAT rates between new building and refurbishment as

recommended by the 1999 (Rogers) Urban Task Force and many other experts and environmentalists. The current disparity is the enemy of sustainability.

Finally there needs to be mention in D1 of the need for high standards of access design for all disability groups – on the lines of our proposal in D3 below.

D2 Delivering good design

This policy should be strengthened to enforce the requirement for social impact analysis (SIA) to be undertaken and published before major developments are designated or designed. Further elaboration of this proposal are in the Just Space Community-led Plan for London additional chapter on the subject.¹

D2 A To identify an area's capacity for growth and understand how to deliver it in a way which strengthens what is valued in a place, boroughs should undertake an evaluation, in preparing Development Plans and area- based strategies, which covers the following elements:

- . 1) *socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics)*

Just Space substitute for 1): **Social Impact Analysis, prepared with local communities and stakeholders, following guidance to be produced by the Mayor.**

G The format of design reviews for any development should be agreed with the borough and comply with the Mayor's guidance on review principles, process and management, ensuring that:

- 1) *design reviews are carried out transparently by independent experts in relevant disciplines*

Just Space proposed addition at the end of 1): **and always with a number of local community representatives.**

This would be an extension of the valuable pioneering practices being followed by the Mayor in his OPDC.

¹ Social Impact Analysis: additional chapter for Community-led Plan for London justspace.org.uk/history

D3 Inclusive design

This requirement is explicitly treated as only applying to project/building design. It should be moved or repeated in D1 which has a wider scope, covering public areas, district design, master planning.

§3.3.8 In playing the role described here the Mayor must undertake to maintain consultations with a wide range of disability representative organisations. He should also build upon the GLA's own *Quieter Homes for London* standards of about 2005

The text of this section relies on BS8300. This reference should be qualified because that standard is acknowledged by the BSI as not being sufficient to meet the needs of people on the autism spectrum. Furthermore the Mayor, if he is to rely on this document, should ensure that copies are available free of charge which is not the case at present.

Buried in a sub-section of text §3.3.1 is "*...show that the potential impacts of the proposal on people and communities who share a protected characteristic have been identified and assessed...*

Just Space proposal: **reflect in policy the requirement that (in effect) EquIA is needed. Equalities considerations should be a core element in all design work.**

D4 Housing quality and standards & Table 3.1 Space Standards

Just Space welcomes the requirement that the same space standards are applied to all tenures.

Just Space groups are alarmed at what seems to be a relaxation of enforcement of space standards, **seeks a reversal to strengthen standards and proposes that there should be a new Key Performance Indicator (KPI) on compliance with internal space standards AND external playspace/ open space standards.** This would mean that compliance was monitored and reported in the Annual Monitoring Report.

D4E "Residential development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Policy D1 London's form and characteristics than a dual aspect dwelling and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating."

Supporting text §3.4.4 & 5 elaborates, suggesting that single aspect is acceptable for flats up to 2 bedrooms. **Suggest modify text to add at least 2-bedrom flats to the ban on single-aspect.**

D5 Accessible housing

The only change from the 2016 Plan in the policy box is that 10% has become **at least** 10% which we support.

All new housing should be built to be accessible and able to meet changing needs over a lifetime, and therefore the Lifetime Homes standard or an equivalent should be the default standard for all new housing. Under the London Plan, 87% of new homes were built to Lifetime Homes standard in 2012, but the weakening of this strategic direction will undermine the provision of disabled friendly housing in London.

To realise the goal of meeting housing need it is essential to have accessibility at the centre of housing and planning strategies. Without radically improving access and design standards we will continue to produce too much housing where people can't get to or through the front door, where they can't access all the rooms in the house, where they can't use the bathroom, where they have to stay in hospital for much longer because their home is inaccessible, or where they can't live independently or safely or visit their friends at their homes. All for want of designing housing to access standards that are available, tried and tested and extremely cost-effective.

The text section on exceptions to step-free access is too widely drawn.

§ 3.5.6 In exceptional circumstances, the provision of a lift to dwelling entrances may not be achievable. In the following circumstances and in blocks of four storeys or less, it may be necessary to apply some flexibility in the application of this policy:

- *Specific small-scale infill developments (see Policy H2 Small sites)*
- *Flats above existing shops or garages, and stacked maisonettes where the potential for decked access to lifts is restricted*
- *Blocks where the implications of ongoing maintenance costs on the affordability of service charges for residents will be prohibitive.*

Just Space proposal: **delete last bullet point**. The first two exceptions are reasonable in these defined physical circumstances but the last could be exploited to remove lifts from blocks lacking these defined features. In addition 'only' should be inserted in the main paragraph after 'and' to remove any ambiguity.

D6 Optimising housing density

This is the place where the density matrix is replaced by the "design-led approach" which lists most of the right factors which should influence maximum density, including social infrastructure. But there is no quantification: the list of factors is just going into the black box of "design".

Just Space response:

We welcome the inclusion of infrastructure capacity in D6A and the specific inclusion of social infrastructure in the elaboration at D6B.

However we consider it a grave mistake that these factors are not being quantified in firm criteria. **Daylight, sunlight, children's play space etc should all be subject to quantification** – either alongside a revised density matrix or otherwise.

We are also concerned that the needs of some equalities groups – notably Gypsies and Travellers and houseboat dwellers – are incompatible with dense development and this needs explicit recognition in the Plan.

We are profoundly concerned by the proposal in the draft Plan to discontinue upper density limits set in some sort of table or matrix. Clear upper density limits are essential to discourage speculative over-bidding for sites. Our strong recommendation is **that the upper limits of the density matrix should be strictly applied, at least until a borough has developed the Design Code (policy H2B(2)), which should in turn contain transparent and firm upper limits, not only for small sites.**

GLA officers say in meetings that increased density is always welcome and this attitude seems to pervade the Plan. Just Space groups are deeply concerned that higher density not only means jeopardising standards, but will tend to reduce numbers of family sized units - and will probably reduce social rent/ low cost rent proportions as well - not just because of land price inflation but also because of built form of high density schemes: high building and management costs & thus high service charges.

We note that, elsewhere, the draft Plan accepts the importance of discouraging developers from over-bidding and creating land price rises “based on hope value” (§ 4.6.13). However this logic is applied only to affordable housing percentages and only in Opportunity Areas. The same logic ought to apply to upper density limits and throughout London to minimise speculative land price escalation.

A revised version of the 2016 density matrix has been proposed by the Highbury Group in its submission and valuable work was done by GLA and TFL last year to refine the accessibility measures and take account of bus and train service capacity. The Just Space Community-led Plan proposes that density controls take account of social infrastructure capacity. If a more sophisticated version of the matrix cannot be brought forward in time for the EiP we would support retention of the 2016 matrix for use in boroughs which have not yet completed acceptable Design Codes which include transparent density limits.

It is important to stress that nothing in the density matrix prevents good design and we strongly support the improvement of design. It just requires an upper envelope of density to reduce market uncertainty and speculation.

D6 B (3) is admirable in insisting that infrastructure needs to be in place in time for new development and that development may need to be phased accordingly. **However it says “...in exceptional circumstances...” which we consider should be deleted.**

D7 Public realm

This policy depends upon a document which is not yet published, even in draft, and is accordingly hard to comment upon. It has our provisional support. *“D7 G 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.”*

D 7 I “Ensure that shade and shelter are provided ...”

Just Space suggest inserting **...and sunlight throughout the year in parts of the space**

D8 tall buildings

Declares “tall” to be a relative concept. Boroughs should define it for their areas. They should make maps showing where tall buildings are and are not appropriate.

The draft London Plan is more encouraging of tall buildings than the current 2016 Plan, which required

- identification of inappropriate locations,
- tall buildings are limited to major regeneration areas etc
- Mayor to work with Boroughs to identify sites
- Mayor's Characterisation SPG an important guide

And we are alarmed about this greater permissiveness, both for the direct effects and as yet another way in which loose, flexible, policy would foster speculative land price escalation.

Most of the policies on tall buildings here are intended to cover residential and non-residential buildings. Many Just Space groups have serious concerns about the sort of tall residential buildings that are being built now. There are concerns about social isolation, distance from open space, safety, service charge costs, whether social amenity and infrastructure are provided and other factors. Equally there are other groups in Just Space whose members live in tower blocks and value this form of social housing provision. We wish to see the Mayor doing research and consultation on the range of experiences and preferences of households of various ages, sizes and compositions. Rules governing high residential buildings might better be in the housing chapter but cross-referenced here to focus the attention of designers.

D8 C3 excellent on impact. Just Space suggests adding new

d) The energy costs of higher buildings associated with more lift use, heating, cooling and wind chill should be taken fully into account.

Add a new sub-section D8 C 3 **h) Since standards for the structural fire-resistance, cladding, means of escape and other safety features of tall residential buildings are currently under review by various authorities, extreme caution in the design of such buildings must be the rule pending new regulations and standards.**

and D8 C 3 **i) The Mayor stresses that existing buildings should not be assumed to be unsafe simply by virtue of their height. Well designed tall buildings can be as safe as low ones and expert scrutiny is required to assess whether original design or construction or failings of subsequent management, maintenance or modification have created hazards.**

D9 Basement development

Boroughs should develop policies...

No comment

D10 Safety, security and resilience to emergency, and D11 Fire safety

No comment

D12 Agent of change and D13 Noise

We welcome the protection of important parts of the economy, industries important for the jobs and services they provide.

Construction noise can be quite problematical and the intensification of airports (without expansion) and the tube and rail networks can generate noise nuisance for many Londoners.

With the pressure on local Environmental Health Departments due to reduced staffing and resourcing, the Mayor should ensure that all of his responsibilities and activities assist in preventing the emergence of noise nuisances and their suppression. For example, London wide 'noise' guidelines can be formulated to which 'considerate contractors' and transport operators can sign up. The Mayor has power and opportunities through the planning system to regulate development. Citizen Science can be actively supported to provide the evidence that local communities need to effectively challenge noise nuisances.