

M34. Would policies D1 and D2 provide a justified and effective approach to delivering good design?

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.

In particular:

- . a) Would the approach to delivering good design meet the good growth objectives set out in policies GG1, GG2, GG3 and GG4?

Just Space response:

D1 A 9 "provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity"

The importance of sunlight in public spaces, schools, homes etc is mentioned only in supporting text.

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

D1 A 3 "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."

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 Just Space addition of new point: **demonstrate the community engagement process undertaken and how it has influenced the design.**

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

D1 14: *"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, as shown in Figure 3.1.**

The text 3.1.10 is misleading in not mentioning the top priorities in the circular economy principles shown in Fig 3.1. A new first bullet point should be inserted:

- Retain, refit, refurbish are the top 3 priorities in dealing with existing buildings

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.

- . b) In light of the requirements of policies D1 and D2 would they be effective in achieving the level of growth envisaged?
- . c) Would policies D1 and D2 provide an effective framework to protect the distinctiveness of different parts of London, with particular regard to their social, economic, cultural and residential characteristics?

D2 should be strengthened to enforce the requirement for social impact analysis (SIA) to be undertaken and published before major developments are designated or designed. This is essential to implement the equalities dimensions of Good Growth and also to build in the necessary attention to the distinctiveness of each part of London. Further elaboration of this proposal is 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.

- . d) Would the approach taken to design scrutiny be justified and effective? Would the proposed use of masterplans and design codes, as set out in Policy D2D, help to bring forward

¹ Social Impact Analysis: additional chapter for Community-led Plan for London
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development and ensure high quality design? Would the proposed use of design review, as set out in Policy D2F, be justified and effective? In this regard, would the policies deal with strategic planning matters?

- . e) Bearing in mind the resource implications for boroughs in carrying out Policy D2A1-11, would it be effective?
- . f) How would the policies be monitored, given the nature of many of the requirements?
- . g) Overall, would the policies provide an effective and justified strategic framework for the preparation of local plans and neighbourhood plans and development management in relation to this matter?

No. Many community organisations and Just Space have long been concerned by the growth of inscrutable, confidential, pre-application discussions between applicants and LPAs, amplified by Planning Performance Agreements. Community groups and their representative bodies have no such access and often find themselves confronting, at application stage, schemes which in which they find major failings which could have been averted by good community inputs at earlier stages. The proposals here (and in the London Quality Review Charter) for the wider use of design reviews contain no provision for community voices to be heard in the process and, indeed, the confidentiality of the process is explicit, until the outcome is reported at application stage. This is anti-democratic and inconsistent with the Good Growth chapter “§ 1.1.5 *Early engagement with local people leads to better planning proposals...*” We have called for citizen engagement to be strengthened in the Good Growth policies and in the way they are carried through in the rest of the plan. This is an outstanding instance of where that should be done.

One approach, which the Mayor should be congratulated for, is the decision by his Old Oak and Park Royal Development Corporation to institute a.... This approach could now be rolled out as a requirement for the Development Plans, area-based strategies and major development proposals to which Policy D2 refers and complement the purely-professional inputs from design review.