

London Assembly Planning and Regeneration Committee – Wednesday 20 July 2022

Transcript of Agenda Item 9 – Panel 1: Housing Design Standards London Plan Guidance

Sakina Sheikh AM (Chair): This meeting will be split into two sections and we have two separate panels of guests. The first session is on the Housing Design Standards London Plan Guidance (LPG), and the second will be on the Small Site Design Codes. A warm welcome to our first panel of guests on the Housing Design Standards LPG. Thank you so much for joining us, we are really grateful for your time and really appreciate your expertise. Before you speak, it would be helpful if you could just introduce yourself by full name and your title.

Before we begin with the questions, just to prove everyone who claims that the Planning and Regeneration Committee is the super-geeky Committee, we thought, “Absolutely, let us have a presentation”. We are going to start off with a 10-minute presentation from Alan and then we will be moving into the questions. I will pass over to you, Alan. If you could just introduce yourself and give your title, and we can crack on with the presentation.

Alan Smithies (Senior Strategic Planner, Greater London Authority): Thank you very much. I am Alan Smithies, I am a Senior Strategic Planner at the Greater London Authority (GLA), and I work in the London Plan Team. I am just going to present a few slides on the LPG documents that are a focus of this Committee meeting. The first one, as you have mentioned, is the Housing Design Standards LPG.

I am just going to give a brief overview of the background to these documents. Previously known as the Good Quality Homes for All Londoners guidance, this suite of documents provides further guidance on a number of design and housing-related policies in the London Plan. When first published for information only in March 2020 this guidance consisted of four modules: A, B, C and D, shown on the top of the screen there. During the formation of these documents a sounding board comprised of Mayor’s Design Advocates (MDAs), housing developers and borough representatives was set up, a workshop facilitated by the Stephen Lawrence Charitable Trust was held to engage young Londoners on the key quality of life indicators and also their priorities from their perspectives, and lastly, an urban design workshop was held with London boroughs.

Following this, the guidance was formally consulted on as LPG documents between October 2020 and January 2021. This consultation led to a number of changes to the documents and as a result each document has been significantly revised. In particular, the documents were structured and renamed, with Module A being split into two documents. Module A has now been replaced with two documents, the Characterisation and Growth Strategies LPG and the Optimising Site Capacity: A Design-led Approach LPG. These changes were in response to the consultation feedback and new national policy and guidance such as the National Model Design Code document, as well as changes in the National Planning Policy Framework. There were also changes made responding to or brought forward by the COVID pandemic and the continued threat of climate change.

As a result, a second public consultation was carried out in March this year on a revised suite of documents to provide another opportunity to get feedback. These documents have been referred to as the Design and Characterisation LPGs. It is the Housing Design Standards LPG and the Small Site Design Codes LPG, that are of focus today.

This slide [page 2 Appendix 2] shows how the suite of documents work together. The documents on the left-hand side are those relating to the local plan-making stage. In particular this includes, the Characterisation and Growth Strategies LPG, which feeds in to the Small Site Design Codes work that is a focus today. These documents focus on plan-making and the engagement with communities at this stage of the planning process. Conversely, on the right-hand screen is the Housing Design Standards LPG, which is relevant when assessing applications at the planning application stage. This document sets out a number of housing standards that should be met for all residential planning applications and it is particularly relevant to urban designers and architects of residential developments.

In terms of the two public consultations that have been held, I have included a number of statistics for each one. For each consultation the suite of documents was consulted upon and therefore the statistics shown are for the consultation as a whole. For each consultation, the GLA held a number of engagement events to seek the opinions of stakeholders. We received a large range of responses from a diverse range of stakeholders and these include community groups, local authorities, businesses and professional bodies throughout London. We have also had specific support and input from several MDAs when revising the documents.

Before I go on to review the LPGs, I just want to touch on the project timescales. As I have mentioned, the documents were consulted upon in March this year [2022] and as a result we are currently reviewing the consultation responses and engaging with different stakeholders. The next steps are to revise the documents to reflect the feedback, with an aim to publish the final versions of the documents in autumn/winter 2022.

I am going to now turn to the Housing Design Standards LPG. This guidance aims to raise the bar in terms of residential quality in London. The guidance is applicable to all residential development in London that falls under the C3 use class. As such, it is not applicable to other forms of housing such as shared living, temporary accommodation and student accommodation. It is primarily aimed at developers and their design teams seeking planning permission and also borough development management officers when assessing those applications.

The standards express what it means to optimise site capacity for residential development as opposed to simply maximising the development of a site, and the document aims to be what we are referring to as a one-stop shop for designers and architects for residential development. It also aims to address the impacts of the COVID pandemic and the risk of and to climate change. It introduces a set of best practice standards, which aim to raise the design quality of residential development even further.

As mentioned earlier, the document has been revised significantly since it was first part of the Good Quality Homes for All Londoners guidance. This has been in response to a number of key areas of feedback. These include a concern that the document was too lengthy and wordy, a need to update the guidance to reflect the changing needs of Londoners in the wake of the COVID pandemic. There were also suggestions that the guidance could push further on environmental matters. Lastly, there were a number of suggested amendments to specific standards. For instance, there was a concern that a few extracts from the BRE guidance on daylight and sunlight were being used as a housing standard.

These led to the document being significantly revised, with key changes including firstly a slimming-down of the document by removing much of the supporting text. This has led to the document going from 83 pages to 29 pages. The document has also been restructured to align more closely with the design process. The revised document now has three sections, the first, part A, focusing on standards relating to place-making and the public realm, then part B focusing on shared and auxiliary spaces, and then finally part C focusing on design aspects relating to the home and private outside space. Finally, a set of best practice standards have been added to the document and a number of standards have been amended, revised or removed.

This includes, for instance, the removal of two standards relating to daylight and sunlight that specifically referenced two elements of the BRE daylight and sunlight guidance. This decision was made as it was considered that the BRE guidance should be referenced as a whole, which the LPG now does. It was felt that the BRE guidance provides detailed technical guidance with multiple assessment methods that need to be read as a whole, and also that the BRE Guidance is clear that it should not be seen as an instrument of planning. As a result, the standards now focus on the qualitative outcomes that we want to achieve for the space rather than copying a few parts of existing national guidance out of context with the rest of the guidance. Instead, the guidance addresses aspect relating to daylight and sunlight in a number of other standards, including standards A1.7, A1.8, A2.2, B9.5, and the standards C4.1 through to C4.8.

We are also intending to amend the document further to reflect the second public consultation. The key feedback during this second public consultation was as follows. First, most respondents were supportive of the reduced length, but there was a concern about the increased number of standards. There was also a desire to have more clarity on some of the standards. As a result, we are considering amending some of these further and also introducing a series of illustrations to support designers in the understanding of the standards. In terms of the best practice standards, there was a mixture of support and concern for them and how they are presented.

The guidance has changed in light of the COVID-19 pandemic and the changing needs of Londoners. In particular, this revised document now requires designers and architects to take account of and design for the shift to increased home working. This includes a best practice standard for new homes to provide a dedicated study room as well as additional storage, and the document also sets out a new best practice space standard that aims to increase the size of homes. The guidance also reiterates the importance of designing homes with flexibility and choice in mind. As a result, the section C3 focuses on this aspect of design and sets out how designers should demonstrate how space could be easily modified. Lastly, the guidance sets out a number of housing standards which advocate for even greater access to and availability of green open space in new developments.

I am nearly there. The revised document reiterates the importance of inclusive and accessible homes and communal spaces in order to assist London in becoming a more equal city. This is done through different parts of the document. For instance, in part A, standard A2.2 states that large developments should aim to deliver a wide range of housing tenures and typologies and respond to specific local needs such as specialist housing for older people and multigenerational housing. Furthermore, standards A5.1, A5.2 and A5.3 address the accessibility to public realm, require developments to be tenure-blind and for non-residential facilities such as gyms, pools and shared workspaces to be accessible to all residents and ideally the wider community. There are also some standards in part B that address access requirements for shared and communal spaces, advocating that they should be accessible and available to all occupants regardless of tenure. In part C there are standards addressing issues of inclusion and accessibility within the home. These are located in section C1 of the guidance, which sets out five standards relating to that.

Lastly, improving environmental sustainability of development is a central aim of this guidance. In particular, there are a number of design standards that address environmental sustainability. In part A these include standards A1.2, A1.7, A1.13 and A1.17. These standards advocate for the retention and reuse of existing buildings, that the orientation of new buildings should maximise the quality of daylight and aid thermal comfort, and that developments are designed with circular economy in mind, are lean, thermally efficient and minimise whole life carbon emissions. In part B these include standards in part B7 and B8 of the document, and these require development to be green and clean, relating to the energy hierarchy. Lastly, in part C, section C6 of the guidance sets out a number of standards on optimising thermal efficiency within the home.

That is a brief overview of this LPG and I will pass back over to the Chair.

Sakina Sheikh AM (Chair): Thank you very much, Alan, that was really helpful, and I feel like that clarity will hopefully guide the rest of our conversation. I know that we have Elliot [Kemp] online as well, who will be speaking alongside you on this. I will start off by asking you both questions regarding the presentation. Specifically on the second consultation, the round that closed this February [2022], what was done to encourage a more diverse range of people to respond to it?

Alan Smithies (Senior Strategic Planner, Greater London Authority): I will start. Ensuring that there is a diverse range of responses and that we are reaching the most diverse range of Londoners has been a really important aspect. As such, we held a number of different events, both GLA events which we advertised working with colleagues in our Comms Team to make sure that word was spread out, and a number of other engagement events through other means and other organisations, including Urban Design London, we did a number of engagement events through them; and ALBPO (Association of London Borough Planning Officers), we did a presentation there as well. We tried to reach a really diverse range of Londoners to ensure that the word is out there and that we can seek a diverse range of feedback.

Sakina Sheikh AM (Chair): I might push you further on this because that does not sound hugely diverse to me, if I am going to be frank. That sounds like very traditional planning outreach. Something the Committee is really keen on this year is to ensure that we make sure we have a diverse range of voices contributing to the future of planning in London. Maybe you could just offer a few more specifics. Obviously, you have talked about Urban Design London, ALBPO and the work with the Comms Team and the Engagement Teams, but in terms of maybe non-traditional planning stakeholders, what were the efforts done to reach out to them?

Elliot Kemp (Policy Team Leader - Design, Heritage & Environment, Greater London Authority): I might come in on this. Let me introduce myself. I am Elliot Kemp, I am in the London Plan Team and I am a Policy Team Leader on Heritage, Design and the Environment. We have a large database of people that we notify about all our consultations, but also, we have media channels such as Twitter and TalkLondon to get the word out that these consultations are running, with links to the relevant websites. We have a new online tool that we use for web engagement and consultation feedback that makes it as easy as possible for people to contribute, rather than more traditional emails and letters.

Sakina Sheikh AM (Chair): Thank you very much for that, Elliot. I do not know if it is keen to start off on the first question with an outcome already for the Committee, but I feel like, given that this is a shared agenda it would be really fantastic at some point to dig into that database and review it, see who is on that and who is perhaps missing, so that we can begin to build that up and make sure that it is reaching as diverse an audience as possible. What you have said, Alan, in your presentation about the changes from consultation 1 to consultation 2 is really significant, it is really fantastic to see that change and we are all impressed with the detail, but it could be, I suppose, better and a wider range of voices contributing to those changes would help that.

My second question I think has been covered so I am happy to move on to Assembly Member Boff for his question.

Andrew Boff AM: Thank you. I would like to ask Ms Gbolade, how do these standards meet Londoners' changing needs and how do they allow for flexibility in how people can use their homes?

Tara Gbolade (Director, Gbolade Design Studio and Mayor's Design Advocate): I am Tara Gbolade, I am an architect and co-director of Gbolade Design Studio and I am also an MDA. In terms of how the standards meet London's changing needs, I think they do so in a few ways. One is certainly the pandemic and how the buildings standards have been pushed or challenged in this, looking at space standards and how they are perhaps larger than we would normally expect at this stage. The second is looking at climate change, and the standards here specifically focus on the increased quality of buildings and of homes. Here, there is a stress on the design process from orientation and place-making through to shared amenities, shared lobbies, for example, when we are looking at flat layouts, and right down to the homes and the fabric-first approach that has been adopted for how houses will be used.

Specifically with the flexibility question, the standards have also included points on perhaps where structural walls will be placed outside the key party walls, so that internally, rooms can be manipulated in future to change with the needs and requirements of those who use those spaces.

Andrew Boff AM: You mentioned that the pandemic has had an effect on the design codes and that there is now an expectation for larger homes.

Tara Gbolade (Director, Gbolade Design Studio and Mayor's Design Advocate): Specifically there I am referring to the promotion of space dedicated for working from home, for example, recognising that more people will require more flexible working and some working from home could now be accommodated in homes, looking at where spaces can be accommodated within the existing home or indeed pushing boundaries with best practice to look for increased space for dedicated work-from-home spaces.

Andrew Boff AM: That was not the only challenge that the pandemic brought about, of course. I believe there is data to suggest that proximity contributed to that disease spreading. There are also things like -- I know somebody else has a question on this and I do not want to tread on their toes too soon -- the availability of gardens. Has that been recognised in the design standards?

Tara Gbolade (Director, Gbolade Design Studio and Mayor's Design Advocate): Yes, absolutely, I believe so. There are three key points that I think are really helpful with these. The first looks at the design process, looking at place-making and the public realm, your point about garden space, but also shared amenity space like courtyards and the quality of those. Introducing far more green infrastructure has been encouraged within the standards, ensuring the quality of these spaces and that they are more useful to residents in effect. The other is the shared amenity spaces that you have started to highlight and the ancillary spaces, taking advantages of aspects like green roofs and courtyards, for example, and ensuring that they are accessible to a wide variety of people.

Andrew Boff AM: Thank you very much.

Sakina Sheikh AM (Chair): Thank you, Assembly Member Boff. I will bring in Assembly Member Baker next.

Elly Baker AM: My question is around the various diverse needs of different communities, to Andrea and David. How will these standards change the way that developers carry out meaningful engagement with residents and communities and what do you think a sign of successful change would be?

Andrea Carey Fuller (Deptford Neighbourhood Action and Just Space): Hi, I am Andrea Carey, the representative today from Just Space. I have worked with Just Space throughout Neighbourhood Planning, which is how I met Richard [Lee, Coordinator, Just Space], and I am the Coordinator of Deptford Neighbourhood Forum.

In terms of engagement of communities, I do feel that the only way we were effectively able to engage communities in the process for our neighbourhood planning under Regulation 14 [of the Neighbourhood Planning (General) Regulations 2012] was to get a specific amount of funding, which we got from Trust for London. We went out to the communities because those hard-to-reach communities are people who are just surviving day to day and they do not have time or the resources to go to events that may be set up, whether by architects, the GLA or whatever. You need to engage the community themselves.

One of the things we did, for example, on the Silwood Estate in our area - which is an estate that, just by the geography of the way it is set out, is separated by a bit of Southwark; it is not even connected to the other part of Lewisham, it is on the edge of Deptford - was to enlist the support of a community development worker there, who engaged two young people. We provided resources in terms of a laptop, printer and materials. They decided that they would like to put on a fish and chip event, they had the materials exhibited in a local church, and they got people out to that because there was something in it for them to encourage them to come out and to take part.

Another one of our volunteers was a mum herself and she went to the school gates and spoke to the parents and the children at the school gates, trying to ask the children what is important to them in terms of play, for example, or what kind of house they wanted to live in. There are ways to take the ideas direct to the communities that are hard to get to for whatever reason. Early on, one of the other things we did was that there was a Vietnamese cultural event, we asked them if we could have a table at their event and we helped support their event in order to get their views at that event. It is really important to look at the ways that you do these things, identifying the communities that you are looking to get involved, in terms of asking them questions, making it accessible in terms of language and finding out what is important for them.

One of the things that I wanted to refer to was the Just Space Community Led Recovery Plan, which very much suggests that the Mayor should create Community Review Panels and Citizens Assemblies made up of community members and use criteria designed to give priority to smaller grassroots organisations and members of communities that have historically been disadvantaged by the planning system. Even looking at things like equality impact assessments, they do not cover, in terms of priority groups, people like homeless people or asylum-seekers and refugees. It is looking at those kinds of issues in relation to the design codes or policies that you have together, which, by the way, I think are really good and really moving things forward in terms of looking at a holistic approach to design and planning.

Elly Baker AM: That is really helpful, thanks. I think that sums up what meaningful engagement would look like from the other end. I see you appreciate some of the stuff in the standards we are looking at today.

Andrea Carey Fuller (Deptford Neighbourhood Action and Just Space): Yes, yes.

Elly Baker AM: Is there anything in it that you think facilitates that type of engagement? Do you think that moves us on to be more --

Andrea Carey Fuller (Deptford Neighbourhood Action and Just Space): I am not sure, forgive me, because I have gone through most of it, but I have not seen an outline of what effective community engagement might look like or examples. Is there anything like that within this? Maybe that is something that Just Space could --- it could be an appendix to this, in terms of suggestions for how to improve the engagement over these new standards to look at what people themselves think about them and what they might feel is missing for them. It is very hard for me to speak, as a white person, for a lot of different black and cultural communities. I could not do that. Do you know what I mean?

Elly Baker AM: Yes, of course.

Andrea Carey Fuller (Deptford Neighbourhood Action and Just Space): You would need to ask them themselves what they would like to see. That is why I would suggest considering an extra piece of work with Just Space and maybe Neighbourhood Forums across London as well, to look at what input they could give in terms of the engagement around this.

Elly Baker AM: That is really helpful, thank you. David, can I come to you?

David Stronge (Design Director, Peabody Housing Association): Hello, I am David Stronge, Design Director at Peabody and also a registered architect. On the question around meaningful engagement, what I would like to propose is that perhaps Peabody is the type of organisation that really does wish to do that through its new build developments, and has been doing so for some time and can bring to mind a number of examples.

There are two ways to look at it. In terms of new planning applications, you have a site or a context-specific engagement plan. There are other parts of the GLA that we engage with in relation to post-occupancy evaluation, where we solicit the feedback from our residents anywhere between one and two years after moving in. We get meaningful feedback from a diverse group of people, our residents, through that process. It does not happen on 100% of our developments, but we do pick a sample size. That is one source. The word "proportionate" is used in the document and I think that is important. We have, on our larger schemes, some really meaningful examples of that engagement through multiple channels, whether that is online, setting up a specific website, or holding face-to-face community events or the equivalent during pandemic shutdowns etc.

On the part of your question around the signs of success, for me it is the difference that it has made to the design from where you started to where it ended up and being able to evidence that kind of journey. Certainly, on one of our significant schemes in north London, where we started is not where we finished. We ended up with significant improvements around connectivity through the site, around the types of amenities and the quantity of them on the site, and the quality of the ones that had been there prior to the consultation. It is not so much that the quantity changed, but the quality of them and the mixed use of them changed. Those are signs of success, where it actually makes a real difference to the design and then that goes in for planning.

Elly Baker AM: That is fantastic. Again, just a follow-up. Do you feel that these standards specifically help direct the engagement you have, in terms of what sort of things the standards say are the most important? Is that how it might help you direct that engagement in the future?

David Stronge (Design Director, Peabody Housing Association): Yes, it certainly comes out that that is a push and a requirement. Specifically, point A5.6 about evidencing your community engagement strategy with reference to multiple types of engagement is a specific ask which is very useful.

Elly Baker AM: That is brilliant, thank you. Alan, you waited very patiently there.

Alan Smithies (Senior Strategic Planner, Greater London Authority): Yes, thanks. I just wanted to say, that I absolutely agree with everything the member from Just Space was saying about the importance of community and resident involvement. I wanted to raise that this is a suite of documents and we have definitely tried to reiterate the importance of community and resident involvement and engagement within the standards themselves. As David has just mentioned, there is the standard A5.6, which is about community

engagement strategy, and then we also have C1.4, which is about undertaking community engagement to identify any specific cultural requirements within the local community that need addressing within the design. The Housing Design Standards LPG ultimately is for designers and architects and is at the planning application stage.

That is why I raise the point about the other suite of documents, because we have absolutely tried to ensure that resident involvement and community involvement at the local plan-making stage is reiterated in those documents. That is where we feel that there is a real opportunity, if you like, because by the time developments have got to the planning application stage, yes, we are asking them to evidence what they have done, which is what we should do and this is what the Housing Design Standards LPG does, but ultimately, for that meaningful engagement, we feel that engaging residents and communities at the local plan-making stage on developments before they have come to planning application stages is an even better, more optimum solution. I just wanted to raise that.

Elly Baker AM: That is really helpful, thank you very much.

Sakina Sheikh AM (Chair): Brilliant. Assembly Member Berry.

Siân Berry AM: Thank you very much, Chair. I am going to ask some questions about the climate emergency and also green space, and they are quite closely linked together. I want to start with Andrea, if that is all right, on both of those issues, which are obviously inextricably linked. Do you feel that the standards that are set out now in those documents go far enough to meet the challenges of the climate emergency, and how will they act to ensure that we get the new buildings that we deserve? Then the same question in relation to green space and the benefits that can bring; how well are these documents now doing?

Andrea Carey Fuller (Deptford Neighbourhood Action and Just Space): I think they are making a positive step forwards - I have highlighted some of them I wanted to mention - but sometimes the wording is still a bit woolly. I would like to see definite commitments. There was one on the circular economy that I highlighted to myself, "Design with the circular economy in mind". It is not the "incorporate" word that is used in other parts of the document, which is a more definite intent. I will give you a comparison with our Neighbourhood Plan, one that we have here, which says,

"All Development is encouraged to use Energy, Circular Economy and Whole Life-Cycle Carbon Assessments throughout the pre-application process and design progression to demonstrate and maximise outcomes for London Plan Policy 'Minimising greenhouse gas emissions'."

I am not sure if "design with the circular economy in mind" is getting to all stages of the process, if you see what I mean, in comparison.

Obviously, the Healthy Streets approach is what we would expect to see in a move forward, but again I am trying to find the right bits that I have highlighted. "Incorporate trees in new streets unless there are compelling reasons not to do so." We had a policy where we were looking for developers to input new trees into developments, and we really would like to see almost one tree per new home in terms of increasing tree cover, not just in terms of the cooling aspects and shade, but also nature, biodiversity and cleaning up the air.

There are good things in here, but we have a whole suite in our Neighbourhood Plan, for example, that is focused on child-friendly design. As we know, everything is interconnected, and we know from Child in the City and organisations like them that if environments are good for children, they are good for everybody. I would really love to see a little section related to this. Things are set out, like streets, public open space and

things like that, but I would love to see a section actually focusing on children and what it means for child-friendly designs. Let me give you a couple of examples in our Child-Friendly Deptford. So, it has got:

“Development is encouraged to demonstrate how internal layouts have regard to adequate space for children and young people (birth to 17 years old), providing privacy to play, do their homework, have their friends to visit and interact with parents and other adults, e.g. space in the kitchen for a chair to allow for conversation and to help with food preparation; space in their bedroom and/or living room to do homework; space for books and materials.”

We have talked about space standards in relation to people working from home, but we need to look at space standards for children, because increasingly with these kinds of modular-type flats that are being built there is not much storage space contained within them or even space for children, books and homework, physical education (PE) kits, play, being able to watch their parents cook or to learn how to cook and things like that.

One of the key things for us is children having access to nature because, as you know, you were one of the key supporters, along with Len Duvall [AM], to save Tidemill Garden and the whole idea is to keep nature spaces. There are lots of built play spaces, but children are increasingly having less access to true nature and biodiversity, and they need that in terms of their immune systems.

Siân Berry AM: Can I ask a follow-up on that? This is what my colleague was alluding to earlier on. Do you have a view, as a group and as an individual, on the value of a rooftop play space in comparison with somewhere that is more on the ground and related to the surrounding area?

Andrea Carey Fuller (Deptford Neighbourhood Action and Just Space): Yes. I think it is important for children to be grounded in nature. Rooftops are great for solar panels, for green roofs and maybe even for rooftop flats with some green growing space, but really, for children, in terms of connection to nature, nature is connected mainly through the ground, through trees or brambles, blackberries, butterflies, bees, etc. It is important to have nature play spaces where you can have a tyre swing attached to a tree. It is very difficult if it is on a roof and not very safe.

Siân Berry AM: Probably banned, yes.

Andrea Carey Fuller (Deptford Neighbourhood Action and Just Space): Yes, totally impractical. Even things like sandpits and stuff like that.

If you are looking at studies, there was one called Growing Seeds or something like that [Sowing the Seeds: Reconnecting London's Children with Nature] about children and access to nature that had been done. It is really important. When I was growing up, we used to have this rough land and we used to go out on our bikes, watch butterflies, catch butterflies to identify them and obviously let them go, pick blackberries and things like that. There are increasingly fewer of these spaces around, especially in a very densified city like London. That is why I think it is very important that nature and natural play spaces are built into these environments, or, if new developments are being built around them, that they are maintained and saved, and not replaced with formal pathways with a tiny few bits of green, which do not have the same value to a child as a space that can grow food, where they can grow food, plant flowers and be in nature.

Siân Berry AM: That is great, thank you very much. I need to turn to Tara now for some further comments on the sustainability standards that are now in there, and whether or not they are going far enough in terms of the climate emergency. Obviously, we have just talked about green spaces there and other issues, but I wanted to particularly ask you about demolition and retention of existing buildings. Do you think there is

enough in there about that? I have just been flicking through the documents looking at the worked examples, particularly in the site capacity guidance. There is no example there where you are retaining an existing building. Is there enough in there to help people to do retrofit and incorporate existing infrastructure?

Tara Gbolade (Director, Gbolade Design Studio and Mayor's Design Advocate): I think it starts to move in the right direction. Certainly, standard A1.2 highlights, "Make every attempt to retain and reuse existing built structures", but specifically it identifies that applicants need to demonstrate the benefits of demolition if demolition is not appropriate.

Here, it is important to recognise that, first of all, retention of existing structures is critical. We are in a climate emergency, we recognise the embodied carbon and energy that has already gone into the built structure, and this starts to move in the right direction in terms of placing that emphasis on the retention of existing buildings and existing structures, and working within them. What it also starts to nod to, because it specifically highlights the Whole Life-Cycle Carbon Assessment, is thinking about the embodied carbon, not just the existing structure and operational energy as we start to develop or perhaps convert buildings, but, because we are looking at existing buildings, understanding the embodied carbon.

Then it starts to move towards, at least as a designer, thinking about other materiality, so where we are thinking about insulation or perhaps façade treatment, really thinking about the materials and the low-embodied carbon materials that follow on. The fact that it highlights it here means that, as a designer, we are thinking about it. It moves in the direction that certainly in industry we are already moving with other guidance and best practice, towards valuing embodied carbon as much as operational energy.

Siân Berry AM: OK, thank you. Were you involved in the development of these documents?

Tara Gbolade (Director, Gbolade Design Studio and Mayor's Design Advocate): Not this particular document. I am involved more broadly in the industry with other documents on sustainable performance standards.

Siân Berry AM: That is useful to know. This is planning guidance, so it can only be about the implementation of what is in the London Plan. Do you feel like the London Plan itself is offering enough of a hook for the higher standards to be put into these documents?

Tara Gbolade (Director, Gbolade Design Studio and Mayor's Design Advocate): I do think that the London Plan is doing that. It is challenging us beyond what the general Building Regulations standards challenge us with because we have this higher standard that we are working towards. We have specifically highlighted that major developments should be net zero carbon, it is a standard that we have to work towards and that is what we are working towards because it is incorporated within these standards and the wider London Plan. I do think so.

Siân Berry AM: OK. Just finally, to give you a chance, is there anything else you would like to say about the green spaces issue and whether or not the standards do enough to make sure people have access to high-quality green space and the benefits that can provide?

Tara Gbolade (Director, Gbolade Design Studio and Mayor's Design Advocate): I absolutely take your point about grounding, I do think it is important to recognise the different qualities of green space and who it attracts: absolutely children and young people in grounded spaces, perhaps, but also other users. We should ensure that there are a variety of ways that we are able to use green space. It is also thinking about green space not just in a particular development, but in its wider context, recognising that there might be a park

down the street or there might be opportunities for greening particular streets. It speaks specifically about green infrastructure in a wider context. In many cases, one is used to looking at the redline boundary of a particular site, but taking a longer lens and looking far wider gives us an opportunity to be able to create green spaces that are unique to places, but also that complement rather than compete with other types of spaces.

Sakina Sheikh AM (Chair): Thank you very much, Assembly Member Berry. Alan, I know you indicated.

Alan Smithies (Senior Strategic Planner, Greater London Authority): It was just on the point about case studies and whether the documents are doing enough. I wanted to shout out that in the Characterisation and Growth Strategies LPG there is a specific bit, photo and image of the King's Cross redevelopment, particularly focused on Granary Square, the railway yards and the reuse of the gasholders, because we are keen to celebrate the reuse of buildings.

Siân Berry AM: You picked a good example there, I was heavily involved in that application for the whole area and far too many buildings were knocked down in there, but there you go.

Sakina Sheikh AM (Chair): Thank you very much. Assembly Member Boff.

Andrew Boff AM: I will just ask one quick question on the previous section, if I may. To what Ms Gbolade said, we expect developers to adhere to the ambitious design statements on sustainability, but do we expect the Mayor himself to stick to those standards? As I understand it, of the current Affordable Housing Programme, none of those homes actually stick to those standards and will have to be retrofitted. Are you aware of that?

Tara Gbolade (Director, Gbolade Design Studio and Mayor's Design Advocate): For clarity, are you referring to new developments?

Andrew Boff AM: New developments, yes. They have not been as ambitious and they are currently building homes that will have to be retrofitted. To what extent can we get the Mayor himself to follow his own guidance?

Tara Gbolade (Director, Gbolade Design Studio and Mayor's Design Advocate): Certainly, as designers this is what we focus on, ensuring that we are meeting the standards and exceeding the standards. Of course, there are varying interests at play, but as designers and working with larger design teams this is our priority. That is my personal priority, to ensure that we are designing to high-quality sustainability standards.

Andrew Boff AM: Thank you. I wish the Mayor was as ambitious as you are. Thank you very much. If I can move on to Mr Woodward, who is from the Garden Museum, what concerns do you have about the overshadowing of tall buildings?

Christopher Woodward (Director, Garden Museum): We came into this through a local park. We are not a campaigning body, we were just involved with our neighbours in contesting an application for £500 million of tall buildings. From the horticultural perspective, plants need three things: they need sunlight, they need warmth and they need water. One of the issues with the BRE was to do with the wintertime and warmth in particular, because a bulb will not grow if the ground is too cold. It is to do with the enzymes and the glucose. If somewhere is overshadowed in winter, seeds and bulbs do not grow. When we put together some research, you quickly extend from horticulture into biodiversity. You have talked about butterflies; there has been quite a big impact on butterfly habitats with overshadowing because of the temperature triggers in parts of London.

There has been increasing evidence of issues of both mental and physical health. In the report we did, if you read [Sir] Sam Everington [OBE], who was a remarkable person close to here, he talks about rickets. When I grew up you were told about rickets, which was a warning to young children to go outside. It was a vanished disease, but it is back quite significantly in Tower Hamlets owing to vitamin D deficiency. He says that about half of his patients have vitamin D deficiencies. That leads you into COVID, of course, because there is a growing body of work, and that also leads you into ethnicity and COVID. There was a new paper for Public Health England about the relationship between vitamin D deficiency and mortality of COVID in black and Asian ethnic minority groups with more research needed, but evidence suggesting there is a relationship, which all takes us back to sunlight and parks.

This has been great for us because the consultation has been a very good experience, thank you. We did a petition which you helped with and it had over 10,000 signatures, which I think is a significant number of people to take an interest in planning policy, and BRE is behind us. That word “overshadowing” is quite critical because when you come into this you are up against a whole industry of lighting. You, as volunteers, are battling huge computer models made at the expense of tens of thousands of pounds by consultancies. Right now, people like Point 2 [surveyors] will be looking at that line, which is great. It is great that the public realm is not unduly shadowed. People at Point 2 are already looking at that line to push the envelope and to push the boundaries of overshadowing.

Andrew Boff AM: So, as far as you are concerned, within the design ambitions of the Mayor, we have some protection?

Christopher Woodward (Director, Garden Museum): Yes, this is good. Effectively, the sky is precious and the sky has been effectively put up for sale in recent years because tall buildings all take a piece out of the sky. Every penthouse casts a shadow on a local park. That has been a very big accumulative process, and this is a step in a very different direction. One thing we would ask for as a next step is that obviously this is housing and that is great, but there is mixed-use. The skyscrapers could come back with flats and offices, not fall under C3 and cast a shadow over the park; this would not apply.

There is also a whole area of uncertainty about what a park is. King’s Cross is a great example, and Kidbrooke, close to where I live, which is a very good example of planning. Is that shared space? Is that public realm? Certainly, one of the issues with the old BRE [guidance] was that a single use of the word “park” was picked up on about ten years ago by developers. BRE is brilliant for putting together blocks of flats with light wells and stairwells. It is a very good, technical piece of work, but it was not intended for parks. However, there was a creep because of the use of the word “park” on one page of that document. A science-based approach to the green environment about people, plants and pollinators, that is what the planning system needs, and London is leading the way with this.

Andrew Boff AM: If we stick to it. There are, of course, well over 200 tall buildings in the pipeline in London, which have permission and are yet to be built.

Christopher Woodward (Director, Garden Museum): Yes, I know, exactly, and it is quite scary when you come up against it. This business about light is not an innocent confusion. The person we could not get to write for the report was the play guy, he is called Tim, he is not called Tim, he is sort of a Tim, he is a nice person. I was saying, “Why will you not put your name on the report?” and he goes, “I can’t”. He was too nervous of having his name. He said, “I will lose too much business from developers if I contribute”. We had to work through documents; that was more internal stuff about phrases being taken out or put back in. Light is a big battleground. Again, what is good about this is that it has not really been talked about and it is exciting that we are talking about it now here. Sunlight has not previously been discussed in planning.

Andrew Boff AM: We talked a lot about it during the decisions about Bishopsgate Goodsyrd, and that was more overshadowing other people's properties than gardens.

Christopher Woodward (Director, Garden Museum): Again, in recent years the whole relationship between mental health and overshadowing is quite significant. You read many accounts of people who are depressed when they live on the ground floor of social housing. There is a lot to do. I am not a scientist, I am an art historian, but there is this big body of research and it would be great if there was some science-based approach to healthy urban design. We are in a borough, Tower Hamlets, which is one of the worst in Britain for access to green space. It is a very real thing.

Andrew Boff AM: This Committee has done some work on tall buildings in the past.

Christopher Woodward (Director, Garden Museum): Great.

Andrew Boff AM: One of the things we did not touch on was the psychological effects of the lack of light, and I know you say it is not your subject, but I would very grateful if you could point us in those directions at a later time.

Christopher Woodward (Director, Garden Museum): In that document by Dr Sue Stuart-Smith, who has written a book on health and gardening and happens to be married to the landscape designer Tom Stuart-Smith, it is things like people going into hospital getting out quicker if they have sunshine. There are a dozen of these studies. She showed me some videos, and we have all seen it, where everyone sits on the sunny bench, and children gravitate towards sunshine. We won this public inquiry, but one of the issues with our park opposite the museum was that, yes, you scrape through with two hours of sunlight under the old system but, setting aside the fact that that did not address winter - the playground would get those two hours between 11am and 1pm when the kids were at school.

There is a whole world of development to come from this. Everyone knows why high-rise works: because of those economies of profit. Once you get above 12 or 13 stories you start to make exponentially large sums of money.

Andrew Boff AM: Thank you very much. Thank you, Chair.

Sakina Sheikh AM (Chair): Yes, thank you. Assembly Member Berry, just before you come in, it sounds like there is some follow-up so if you are able to send us any of that information, Chris, in your report as well, I am sure the Committee would be very delighted to read it.

Christopher Woodward (Director, Garden Museum): Thank you.

Sakina Sheikh AM (Chair): Thank you. Assembly Member Berry.

Siân Berry AM: Thank you. Yes, I would like to turn to Alan and Elliot from the GLA. How do you expect developers to use the guidance to measure the impact of residential buildings on the green spaces and public spaces now? Will they be pushing the envelope of your new wording, do you think?

Elliot Kemp (Policy Team Leader - Design, Heritage & Environment, Greater London Authority): The way that we tried to make the standards work is to talk about the important things that you want to achieve in the design: the different standards, where you want the daylight or sunlight to be and what the

important amenities are. It is giving a clear steer to the designer, as intended by the document, but also to the development management officer when they are assessing it. Where are these different amenities? How is the site designed? How are the green spaces designed and laid out in relation to any tall element in the development? It is easier, because the BRE guidance is incredibly technical and you rely on another expert to translate the report for you even if you are a development management officer. By putting it into more simple, qualitative language about what the design should achieve, we are hoping it is easier and that we get a better quality design at the end of the day.

Siân Berry AM: That is helpful. Now, one of the things that the Garden Museum and other campaigners were concerned about was the previous wording, which seemed to put into stone the BRE guidance about two hours during March. That is now gone and you now have the more flexible, vaguer wording, “not unduly overshadowed”. Would you consider actually putting in the higher standard that they have asked for, which is the six hours of sunlight? You were asked to do that in the consultation before and you have not done that. Why not?

Elliot Kemp (Policy Team Leader - Design, Heritage & Environment, Greater London Authority): We decided not to refer to the BRE guidance and to separate this guidance from it, as Alan explained in his presentation. As far as we are aware, the BRE guidance is the only national guidance that has any numeric hours of daylight for open space as a requirement, and we do not have the evidence for having another number; if there is the evidence out there, we would welcome to see it. The document that BRE produces requires a number of different assessment methods, it is technical and, as I just said, it is often difficult to interpret, so getting the outcome you want would probably be easier to do in the way we have approached it. If there is evidence for six hours or whatever number of hours during the equinox points in the year, then we would welcome to see it.

Siân Berry AM: OK. We will all be paying close attention to the arguments that developers use for what is not unduly overshadowed, and we may come back on that at a future date. Also, is the GLA doing anything to mitigate or asking for measures to mitigate any negative impacts on biodiversity that occur?

Elliot Kemp (Policy Team Leader - Design, Heritage & Environment, Greater London Authority): The point of this document is that it is a bit of one-stop shop and points you to lots of different things. It links to the London Plan policies, but also points you to different London Plan guidance. The most relevant one for this is the Urban Greening Factor (UGF). This would apply to all major developments and they would need to conform to that policy requirement. That would be setting out what is required, and by achieving that you are also delivering the biodiversity net gains that would come from achieving the UGF score. That is the way that we anticipate you would measure that.

Siân Berry AM: Thank you, that is all. Thank you, Chair.

Sakina Sheikh AM (Chair): Thank you very much, Assembly Member Berry. Elliot, if I heard correctly, it did sound like you were welcome to receiving some more evidence around sunlight and the minimum access to it, so I think perhaps after this meeting we could have a follow-up with Chris and we could facilitate that from the Committee to ensure that some of that information is passed over. You have indicated so I do not know if you wanted to come in now, Chris.

Christopher Woodward (Director, Garden Museum): Yes, simply to say that I remembered why I was wearing this shirt, because it has cornflowers on it.

Siân Berry AM: Excellent.

Christopher Woodward (Director, Garden Museum): I take your point about a number not being the answer, it is a whole set of factors, but nature does give you numbers because you need about six hours for roses, dahlias, cornflowers, buttercups or lavender. There are a whole bunch of flowers. There is a measure coming from nature, but also from all these other scientific studies. Thank you.

Sakina Sheikh AM (Chair): Yes. Light is a big battleground, to use your words, and I think everyone on the Committee is in agreement with that. Just from Elliot and Alan's perspective, it is really fantastic to have seen the movement from the original LPGs, removing the two-hour minimum with an indication that that is actually not enough. Now that we have - to use Assembly Member Berry's word - "flexibility" in the language, perhaps we can build on that. I do think it could be worth, as a follow-up from this Committee, perhaps having Chris convene some of the people who have helped collate the evidence that is in his report, to meet with yourself, Alan and Elliot, to continue that conversation to ensure that we get the best outcome. Great. I am going to move us on to the final questions, and that is back to Assembly Member Boff.

Andrew Boff AM: I just wanted to understand whether or not these standards that are set out in the newer draft LPGs are straightforward, practical, and viable for architects and developers to implement. Perhaps, Ms Gbolade, you might be able to respond to that.

Tara Gbolade (Director, Gbolade Design Studio and Mayor's Design Advocate): Thank you. "Yes" is the short answer. In terms of if they are straightforward to apply, I believe so. I think the standards clearly follow a process that is necessary and that good designers would use anyway in terms of development, again not necessarily just focused on a building or a set of flats, but actually taking that long view, taking that wider lens and thinking about the shared spaces. They are written out in plain enough English to be used and they are easy to apply. I do appreciate the fact that, of course, some point back to the London Plan and all of these are built off the London Plan. Specifically, on the right-hand side and on the standards, it highlights exactly where the London Plan each of these standards have been brought in and expanded upon. I thought that was really useful to see.

Andrew Boff AM: Thank you. Mr Smithies, yes.

Alan Smithies (Senior Strategic Planner, Greater London Authority): Yes, thank you. I just wanted to build on Tara's point there. One of the reasons we have highlighted the London Plan policies is because, ultimately, the standards are based on the policies within the London Plan itself. Coming back to your point about being deliverable and viable, the London Plan has those policies and it went through the robust examination-in-public, and part of that was assessing the viability of these different policies. The Housing Standards LPG ultimately is a one-stop shop and it points you to these ones. Its supporting bit is the London Plan, which has been viability-tested, is what I am saying.

Andrew Boff AM: Right, OK. Mr Stronge, do you have a view on whether or not these are easy to follow?

David Stronge (Design Director, Peabody Housing Association): Broadly, yes, I would say they are easy to follow. I would recommend that we do a final read-through and ensure that no parts of recommendations are perhaps contradicting or overlapping others. I will give an example around privacy, the policy around privacy says that perhaps inset balconies may be quite a good way to manage that, having access to private open space and privacy, but in the sustainability commentary it says inset balconies are not so great for your form factor or the amount of building envelope that you need to then insulate. There are some instances of we could read it through again and make sure that one part is not contradicting the other. Another one is on podiums, for example: ideally there is no grass and it is maintenance-free planting because it is more biodiverse

and there is less need for lawnmowers. Then there is another part that says, "Make sure there is a separate access up to the podium space for your lawnmower". It just needs that read-through to make sure that the very good logic that is in and throughout it is followed through in each of the final clauses.

Andrew Boff AM: What is the relation between the design quality, the cost of the development and, subsequently, the viability and affordable housing provision?

David Stronge (Design Director, Peabody Housing Association): In terms of its overall impact on viability?

Andrew Boff AM: Yes.

David Stronge (Design Director, Peabody Housing Association): In some ways, as long as the field is level and we are all purchasing land on the basis of the same rules, then it will be as easy or as difficult for Peabody to purchase it as a private, more profit-making developer. If everybody is working within the same constraints, that will adjust itself through the land value in due course.

Where you get a little bit stuck is where you have bought land five years ago or 10 years ago and you thought you were going to be able to build at a certain build cost, but because you have gotten planning a number of years later with a different set of goalposts, your base build assumptions would be thrown out as a result of that. Longer-term, if everyone is working to the same goalposts, then the land value would adjust so that development continues at the rate of demand, etc.

I do recognise that there are some best practice suggestions - so not stated requirements, but best practice suggestions - around 5% additional floor area for oversizing, etc. I cannot remember another example but, yes, room dimensions, for example, are slightly higher. We have our own inhouse design guidance which ensures that rooms are habitable, etc, and the dimensions mentioned in here are slightly larger, maybe between 5% and 10% larger on your main living space width, for example. That has a knock-on effect on how many living rooms you have on one side of a building and the overall length of that building. If you add all those constraints up, 5% on length, 5% on floor area, you are asking for the land value to carry those extra build costs. We just need to, in the short term, make sure we can implement as much as possible, but in the long term it would work its way through in terms of adjusting land values.

Andrew Boff AM: Those are the kind of considerations that you would bring into account when you are aiming to build some lower-rise, family-sized homes compared to taller and denser schemes? You are still building those kind of homes.

David Stronge (Design Director, Peabody Housing Association): When I was thinking about those examples, I was applying that to taller, denser schemes as well.

Andrew Boff AM: Yes. Thank you very much. Thank you, Chair.

Sakina Sheikh AM (Chair): We have managed to finish five minutes early for this section, so what I will do is I will give the guests a one-minute opportunity to add any additional comments that they feel like they have not been able to cover so far. No need to do so if you feel like you have said everything you have come to say.

David Stronge (Design Director, Peabody Housing Association): As well as a read-through, I would suggest just watching that we do not overstep into other areas that are also evolving at the moment in relation

to the Building Safety Regulator and building regulations around safety, and that we are getting certain feedback from that route for planning applications that are also referred to that body. An example might be mobility scooter storage and the safety of that. We are bound to take advice and recommendations from the Building Safety Regulator in due course, but we should try not to overstep or try to do that job within this guidance at the same time.

Sakina Sheikh AM (Chair): Thank you, David. Alan?

Alan Smithies (Senior Strategic Planner, Greater London Authority): Yes, just to say we welcome all these comments.

Sakina Sheikh AM (Chair): Excellent summary. Andrea?

Andrea Carey Fuller (Deptford Neighbourhood Action and Just Space): Hi. I have a couple of comments from Just Space generally, ie from Richard [Lee, Coordinator, Just Space], and which I also support. He says,

“If genuinely affordable housing comes up, Just Space does not favour this term as we feel it allows the delivery of housing at London Affordable Rent that is not affordable to those in housing need. Just Space is less bothered about ensuring genuinely affordable housing targets are met and more concerned to have higher targets for social rented and community-led housing, and to ensure that these are delivered. On daylight and sunlight, Just Space wants to see specific reference to all parks, gardens and play space having access to sunlight rather than general terms like “amenity spaces”.

I just wanted to add to that that some developments have seemed to have encroached on what used to be public space, and so you end up in a situation with previously what was public realm becoming almost private space. I would be keen to see that these standards – they talk very favourably about amenity spaces being accessible to everyone, which is great – somehow make sure that no public realm space gets lost in new developments. Access to rivers and creeks in Deptford, for example, and things like that are really important. I just wanted to add that and community collaborative planning, in terms of empowerment. Thank you.

Sakina Sheikh AM (Chair): Thank you very much, and I think that concludes the first session. It has been really great to have you, we have really enjoyed your comments and I think there a couple of follow-ups that will be noted, so hopefully the Committee will continue working with you all.