

London Assembly Planning and Regeneration Committee – Wednesday 20 July 2022

Transcript of Agenda Item 9 – Panel 2: Small Site Design Codes London Plan Guidance

Sakina Sheikh AM (Chair): We now have the second panel for this Planning and Regeneration Committee. Welcome to the guests who are joining us, we are really grateful for your time and your expertise and we are looking forward to hearing from you. I would ask you, before you begin speaking, just to introduce your full name and your title.

Just to give you some context, we are keen to demonstrate our geekiness on this Committee so we started the last panel with a 10-minute presentation and we will be doing the same for this one as well. We will be looking at the topic of Small Site Design Codes, the London Plan Guidance (LPG) on this, and we will start with a 10-minute presentation from Alan.

Alan Smithies (Senior Strategic Planner - Planning, Greater London Authority): Thank you very much. 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 give a presentation on the Small Site Design Codes LPG.

Like the previous presentation, I am going to start with the aims of this LPG. This document provides further guidance on policy H2 of the London Plan and the creation of area-wide design codes by boroughs and neighbourhood planning groups. These codes are intended to be a key mechanism for delivering a borough's small sites housing target and also an increase in housing through incremental housing development across an area. It does this in a way that is proactive rather than reactive.

This guidance encourages boroughs to front-load design issues and considerations of small sites to the plan-making stage, and when we say "small sites" these are sites of up to 0.25 hectares and they may include new build infill development on vacant and unutilised sites as well as upward extensions of existing buildings. The intention is to encourage clarity on what is acceptable or, in some cases, not acceptable on certain small site conditions throughout a Plan area. This approach also aims to encourage more meaningful upfront engagement with local communities on the development of small sites in their area. Importantly, this is done at the plan-making stage rather than the planning application stage. Lastly, a key intention of area-wide design codes is to raise the design quality of small sites being developed across London.

During the first consultation, which you have already mentioned, we received a wide range of feedback on this document. This included a desire to set out the design coding process more clearly, for greater clarity on the community engagement part of the process, for more illustrations and small site exemplars to be used, and the suggestion that small site design codes could be linked to character types.

As a result, the document has been significantly revised to align with the National Model Design Code. This includes advocating for the use of a coding plan. We are also aiming to provide greater clarity on the expectation to undertake community engagement throughout the document. We have also tried to encompass further illustrations and exemplar small site developments throughout the document, and we are advocating for authorities to identify character types within their local area as a basis for the application of the area-wide design codes. This was something that was not originally in the first document, Module B of the Good Quality Homes for All Londoners guidance.

During the second consultation, some of the key aspects of feedback that we received were as follows. Firstly, the revised structure and alignment with the National Model Design Code was welcome. There was continued concern that local planning authorities may not have enough resources and skills to undertake the process set out in the guidance, and there was a desire to see more guidance on if and how area-wide design codes should be applied to conservation areas. We are also aware that it would be advantageous to include specific wording and guidance on community-led housing and land trusts, as well as encouraging authorities to be aware of other housing needs in the local area, for example, like Gypsy and Traveller accommodation and specialist forms of housing. Lastly, there were a number of questions raised about the community engagement section.

In terms of how the LPG is supporting the delivery of small sites, this document sets out a process for how to create locally set area-wide design codes. As mentioned, this can be done by a local authority or neighbourhood planning group and ultimately it is up to each authority and neighbourhood planning group to clarify what is appropriate in their area. In recent years a number of reports have concluded that the proportion of small house-builders is decreasing. As a result, one of the rationales for encouraging design codes is that it encourages more clarity and leads to higher levels of certainty for those looking to develop a small site. This can specifically assist small and medium enterprises (SMEs) when looking to redevelop a site.

As part of this proactive approach to the development of small sites, the guidance also encourages authorities to identify and map small sites where necessary. This is something that the GLA's Small Sites Small Builders programme is already undertaking and the hope is that this process of identifying sites can also support community-led housing and community land trusts. Our aim is that authorities consider the most suitable and appropriate use for specific sites. This could be for residential development, but it could also be for other uses, such as Gypsy and Traveller accommodation, specialist older persons' housing or supported and specialised accommodation, for instance. Lastly, I just want to mention that there are similarities to the Government's 'street votes' concept. Although we have not had much information on this concept, we feel that the GLA's approach provides a robust process for developing locally specific design codes.

One of the key aims of area-wide design codes is to improve the residential quality of small sites being developed in London. Rather than clarifying appropriate design in lengthy policy documents, design codes aim to provide the constraints of development as a set of simple, concise, illustrative design requirements that are visual and numeric wherever possible. Area-wide design codes also encourage a consistent approach to the redevelopment of small sites with the same characteristics or site conditions. An example is shown (Appendix 3 page 18), where the top image shows a terrace with an inconsistent approach throughout the street to a roof extension, and the bottom shows a more consistent approach. We ultimately feel that this can help avoid a streetscape becoming fragmented. Then, ultimately, design codes can help illustrate not only good practice, but also bad practice, which should be avoided.

The last thing to mention is that the LPG encourages the attachment of planning conditions that could be possibly used to reinstate original architectural features, which can assist in improving the design quality of small sites further. These are features that may have been lost through the passage of time, and examples of these include the reinstatement of missing cornices, downpipes or cast-iron railings, for instance.

This is the end of my presentation and I will pass over to the Chair.

Sakina Sheikh AM (Chair): Thank you for that, Alan. I will start off with some of the points that you have already mentioned, but maybe I will ask you to dig in a little further. Following on the theme from our questions in the last section around that community engagement, this LPG obviously is specifically aimed at local authorities. How has that conversation with local authorities been, in terms of the feedback on the

evolving LPG? Can you point to some examples of the constructive changes? Also, more broadly, how does the LPG encourage and work with local government to ensure meaningful engagement in their local design?

Alan Smithies (Senior Strategic Planner - Planning, Greater London Authority): Sorry, just to clarify, your first question was about what feedback we have had from local authorities on the document?

Sakina Sheikh AM (Chair): Yes, the evolution from the first to the second.

Alan Smithies (Senior Strategic Planner - Planning, Greater London Authority): One of the key things was that they wanted more clarity on the process of how to undertake area-wide design codes, because I think there was some confusion over how that would be done in practice. That is one of the reasons that led us to considering and ultimately putting in the process we now have, which is identifying character types as a basis of those area-wide design codes. That process of identifying character types is set out in the Characterisation and Growth Strategies LPG, one of the other documents as part of the suite.

Your second question was about community engagement, was it?

Sakina Sheikh AM (Chair): Indeed. How does the guidance offer mechanisms for local government to think about meaningful community engagement when they do develop their local design codes?

Alan Smithies (Senior Strategic Planner - Planning, Greater London Authority): This has been a key thing that we have wanted to reiterate in the guidance and something that we feel very strongly we need to emphasise and reiterate. We have tried to do that particularly in, I think, the 'Stage Two' section of the document, which is about the design vision for design codes. Ultimately, in that section we are saying that local authorities or neighbourhood planning groups should be consulting local residents, businesses and local communities on formulating these design codes. We are also aware that there is the potential that we might introduce some more guidance and some more wording in section 1, which also talks about identifying small sites, because at the moment we do not think that the LPG, as it is written, places enough importance on consulting the community at that stage. Identifying small sites - and some boroughs are already doing this - should be done in coordination with consulting local communities and residents.

Sakina Sheikh AM (Chair): Brilliant, thank you. I will push you a little further. What do you think those mechanisms look like, those mechanisms of consultation?

Alan Smithies (Senior Strategic Planner - Planning, Greater London Authority): We talk in the suite of documents about things like co-design and ultimately also things like understanding street preferences, understanding feedback on which areas could have scope for further intensification. Those are just a couple of examples. Does that answer your question?

Sakina Sheikh AM (Chair): It is a good start. I am sure we can pick that up afterwards. There is maybe one specific thing that I wanted to follow up on based on what you were talking about. When you talked about the 'street votes' concept that is incoming in the Levelling-up and Regeneration Bill, you said that it might intersect with the locally specific design codes. Could you just offer some more insight on that and how you anticipate that? The Committee will be coming on to discuss that in the autumn so it would be good to hear your thoughts on that.

Alan Smithies (Senior Strategic Planner - Planning, Greater London Authority): Ultimately, what is said in the Levelling-up and Regeneration Bill I think is just a placeholder, so there is not much to go on there. In terms of the Policy Exchange report or document that sets out the concept of street votes, there are

similarities. We take an approach of identifying character types and then applying an area wide design code on those character types, so these are all conditions - for example, we might be talking about terraces or Metroland estates, areas of semi-detached housing - that all have the same characteristics and architecture, and then applying the design code on there, whereas with the street votes potentially it is down to individual streets. Ultimately, our approach is that neighbourhood planning groups and local authorities will be the ones creating these. I am still not sure about how the mechanism would work with the street votes concept, because I think that is potentially --

Sakina Sheikh AM (Chair): Yet to be seen.

Alan Smithies (Senior Strategic Planner - Planning, Greater London Authority): Yes, exactly, yes.

Sakina Sheikh AM (Chair): Sure. Thank you. I am going to move on to asking David a question. I wanted to ask: what benefits will the new design-led approach, as set out in the 2021 London Plan and this LPG specifically, bring to boroughs in maintaining the local character of their areas?

David Ogunmuyiwa (Founder, ArchitectureDoingPlace and Mayor's Design Advocate): My name is David Ogunmuyiwa, I am an architect, also a Mayor's Design Advocate and in private practice as an architect.

In general, the application of design to these particularly small tricky sites - often with multiple constraints, often quite serious constraints, which is often why they are left over and often available as small sites - are highly dependent on a governing design eye to look at resolving and balancing all of those issues. Having a clear framework that has a set of easily digestible reference points and a set of design languages that talk about appropriateness in specific terms takes a lot of subjectivity out of that, allows some control over what is provided for the community and also allows the developers, if they are local authorities, to be able to articulate that to local communities and have confidence that they can move forward with those without later on down the line, as Alan was saying, coming up against resistance to that, which often happens. In my small practice, we do a lot of small sites infill and, even when it is 100% social housing, by the time it has got so far down the line, often people have busy lives and they have a very narrow bandwidth to understand this stuff until it is almost at a planning stage. When the resistance comes at that point, it is a lot more difficult to have those conversations.

This gives a lot of clarity to everybody. It gives a lot of reassurance to councils to be able to identify where to move forward. It gives a lot of reassurance to architects in how they talk about and articulate the benefit that these developments are going to create for the local community.

Sakina Sheikh AM (Chair): Fantastic. Thank you, David. Emma, could I ask you the same question, please?

Emma Talbot (Director of Planning, London Borough of Lewisham): I am Emma Talbot. I am Director of Planning at the London Borough of Lewisham. We have our own small sites supplementary planning guidance (SPD), which we adopted in October last year [2021].

If you are asking about how these secure design-quality, for us, what we wanted our SPD to do, and the opportunity that this provides, is early conversation with people about these sites, not just the people who live there, but the people who own them and the people who are designing them. We wanted our SPD to be our voice when people are looking at these sites. We wanted to encourage people to get an architect and get professional advice and to understand that many of these sites are not always left over. They are there for a purpose. What was that purpose? Understanding that, thinking it through and then thinking through how we are going to approach it, taking the cues from the surrounding area and understanding of heritage, what that

means. The real benefit is that many things can be seen as constraints on a site, a tree is an opportunity, it should not be a constraint. Getting that message very early on so that people manage their expectations about what their site can accommodate. Through that early conversation, and trying to demystify what the planning process is, because it is incredibly complex and even more so for these sites. Removing as many barriers as we can, will only help to improve quality in its holistic sense and not just the aesthetics.

I am obsessed with the detail of brickwork, but that is not enough. It is how it sits in a site, in an area, in a street, its relationship with neighbours. It is about setting quality. Quality is about speaking to your neighbours and your community groups very early on as you are looking at the concept and encouraging that type of behaviour. Those are the things that we have tried to distil in our SPD to really try to demystify and think about that quality in a much more rounded way. But of course, it really has to look good. That is a given. These could be an excellent toolkit to help local authorities to set out what that means to them.

Sakina Sheikh AM (Chair): That is really helpful. Being obsessed with the detail of brickwork, you are speaking to the right people on both sides of the table. Especially the specificity of the character of the local area that you have gone into is really helpful for us to begin to visualise why the design codes are so important.

Building on that, you answered one of my questions, which is about the benefits of every local council having its own design codes. That is implied in a lot of what you have said. I might flip it and ask whether you are concerned about councils' resources more broadly in terms of being able to develop these design codes? What challenges do you anticipate?

Emma Talbot (Director of Planning, London Borough of Lewisham): Absolutely. Resourcing is a concern and it is a concern across the piece in the public sector. There are not enough people to employ. That is going to be a big barrier. We were very fortunate that we had funding through the Home Building Capacity Fund to bring in people to help us with this. We brought in a fantastic team. It was also a team that went beyond the planning service. Although this is a planning document, we prepared it with our housing development team, and it was joint work between us and regeneration.

But if I were to be asked to do this again right now, post-COVID, with fewer people out there in the market, we would struggle. It is not just money that is a barrier - that is a barrier - but it is the availability of good people. You need good people to do this and to engage in a meaningful way. It cannot be one thing on a website. It is really involved if you want to bring people along with you. Yes, it is going to be a real struggle for authorities.

Sakina Sheikh AM (Chair): Thank you very much for that, Emma. Matthew, I might bring you in as well on this question in terms of the challenges not just more broadly across London that local authorities face, but also if there have been any neighbourhood planning groups or communities that you have worked with or have been made aware of that have faced challenges in engaging with local design codes and helping to develop them.

Professor Matthew Carmona (Bartlett School of Planning UCL, and Chair of the Place Alliance): There are major challenges. We published a report a couple of years ago that looked at design capacity across England in this case, not just in London, and it showed that there were major challenges in terms of design capacity across most local authorities and a considerable concern about how they were going to deliver on this renewed interest, if you like, in design and design quality.

My view is that we should not see this as something we are going to solve overnight. It is a long-term challenge. Documents like this and the National Model Design Code at the national scale are very useful in putting in place a framework that will allow local authorities over time to prioritise these issues, to invest, maybe do some training, use consultants and so forth. Maybe we are talking about 10 years before we will be where we want to be in terms of having the capacity and the skills in place. The critical thing is not to chop and change, not to suddenly change the policy and dump this overnight just because we do not have the capacity now, but to think about how it can be built up over the long term.

Sakina Sheikh AM (Chair): Thank you. That is good food for thought. I will pass over now to Assembly Member Baker for her questions.

Elly Baker AM: My next question is to Emma and it does follow up on some of what you have been saying about community engagement and resistance in some cases. Do you have recent examples of where local authorities have used that community engagement when developing their design codes? You have talked a little bit about the challenges in terms of residents' concerns and oppositions to intensification. I do not know whether you wanted to expand a little bit further on what those challenges are and how the codes can help you get around them.

Emma Talbot (Director of Planning, London Borough of Lewisham): Thank you. When I talk about community consultation, if you start a conversation with the community and it is about a design code, it is probably a bit too late. That was a lesson for us. One of the things that helped us to do the design code was that we had already prepared a character appraisal of the borough. We consulted on it. We were not required to consult on that, but we did. We met with the community and we asked a really simple question: where do you think you live? We started to plot that. There were blurred lines. There are always blurred lines, but it really gave us a level of insight that then helped for this to be a continuation.

The other thing that we showed was lots and lots of examples, examples of the good and examples of the bad, and we focused more on examples of the good because it was around whether you think this is good, how we could encourage this and what the things are that matter to you. If you are asking someone what they think about the wording of policy SL36, criterion B, you have probably lost them. But ask, where do you live, what do you like about it and where do you think there are opportunities?

The other thing was really honest conversations and people are probably fed up in Lewisham of hearing me say this, but we are not being asked if there would be new housing. We are being asked where and how you would want it to look and this is our opportunity to influence it. That shared challenge of when we overlay public open space and conservation areas - and conservation areas do not mean no development but they are more sensitive - and all of these parameters and then we put on a housing target, this is a shared challenge. How can we make sure that this is good? That, for me, is still a difficult conversation and it is always easier when you are doing it around a document versus the actual scheme, but I hope that we have given people the confidence and helped them to understand how we look at things and also the things that are not up for grabs. We have identified the sites that we think could come forward, but we have said gardens are not included in that. If you happen to have a garden, we do not even want you to think about developing this further. That, I hope, gives people the confidence that we have listened, but it is a constant exercise and it is one that you have to demonstrate constantly rather than talk about. I hope that has answered your question.

Elly Baker AM: Yes, it does. I certainly find it reassuring to hear an acknowledgement - I know it will not be perfect - but an acknowledgement that consultation that is not just what you are required, and that is earlier, is such an important part of the process. Thank you for that.

My next question is to Matthew and to David. How does the LPG help boroughs to navigate the appropriate levels of densification? This is a huge concern. Is there enough balance between providing housing and maintaining the access to green and social infrastructure? Is that strong enough in the LPG?

Professor Matthew Carmona (Bartlett School of Planning UCL, and Chair of the Place Alliance): The LPG sets out a process and sets out a framework, as Alan said. It does not necessarily say, "This is the right level of densification for your borough. This is how you need to deal with greenness, but it sets out a process that, if local authorities go through that process, they will have a much better chance of coming out the end with appropriate policies that communities will feel more able to back and that will be more sensitive in terms of their localities. Yes, it is about following the process. This particular piece of guidance sets that out very clearly and very well and concisely. It should be relatively straightforward for local authorities to engage with it and for the community as well to engage with it.

Elly Baker AM: Thank you.

David Ogunmuyiwa (Founder, ArchitectureDoingPlace and Mayor's Design Advocate): From our point of view, as architects, often it is not up to us to make those particular judgements. What I would say is that, as practitioners, what we are aware of is that this document is part of a suite of broader documents that control those issues. We are always conscious from other documents and other development control guidelines about the need to maintain green cover, the need for access to daylight that you were speaking about earlier, the need for access to green space and the Urban Greening Factor and social amenities, and looking at development in infill sites like this not only as housing plots, but also, as in the conversation this morning somebody was talking about it, as urban infrastructure. It does more than one thing and it contributes to the broader neighbourhood and community in lots of way. That also has to be acknowledged and made space for.

Just to go back to something that Emma was pointing out earlier, absolutely, we do not just look at bricks. We look at a holistic, broader sense of what impact these developments can make and how they can be a lot more than themselves in lots of tangible and intangible ways and lots of design ways and also in the meaning of what your neighbourhood means and the character of your experience of that environment as well. Hopefully, we will touch on certain things in terms of opportunities for diversity and more people having access to these processes as well further down the line.

Elly Baker AM: Thank you. Just to reflect back to you with your architect's hat on, what you are saying is, if boroughs do follow these codes, then by the time you are getting involved, it is much less likely that you are going to input something that is not going to be found appropriate by the local community.

David Ogunmuyiwa (Founder, ArchitectureDoingPlace and Mayor's Design Advocate): Absolutely. I would like to think that most responsible architects would be responsible about that from the outset, but what this does do is it creates a datum that everybody understands, that good, responsible architects do this sort of thing and look at the world in this sort of way. More importantly, as Emma has said, it articulates it in this sort of way, not just about what the built form is that is going on that site, but also all of the things that are there. A tree is absolutely not a constraint. I would not consider it as a constraint. But we are working on a scheme at the moment where there is a high-voltage electrical cable that nobody knew was there under the ground. We have just put something in for planning with a massive railway viaduct behind it. That is very tricky and we are right next door to an operating premises. There are lots of things in London's existing dense, chaotic built form that provide opportunities, but also need negotiating and need everybody to be on the same page about what that means and what can be generated from that.

Elly Baker AM: My last question is around how the LPG might benefit efforts to deliver homes that meet the needs of different groups of Londoners and our diverse communities, for instance - although there will be huge numbers of examples - housing for older Londoners. This question is to Lev and David may have views as well.

Lev Kerimol (Community Led Housing London): I am Lev Kerimol from Community Led Housing London. We are hosted by a small housing association called CDS Co-operatives.

I do not know, having looked at the document, whether it makes specific reference to what the housing should be. It does not talk about that and so that might relate to other policies in terms of affordability or who the residents might be.

Elly Baker AM: I suppose in terms of how different groups of Londoners and different communities might want or need different things from their housing. Sometimes that just is not taken into account at all at the design stage and that is a real shame. Not everyone just wants to live in exactly the same housing. I wonder whether you think this code allows that to happen more at a design stage.

Lev Kerimol (Community Led Housing London): Definitely, in terms of the groups we work with, people are constantly trying to do something different to the norm. Either that is because of how they want to live and how they need to live, the way people are included or housed or allocated housing and so on. I do not see very much in the document at the moment that either promotes that or necessarily stops that. It is ambivalent on it, I would say. There could be more. One area I have is in terms of how people share amenities and share facilities. I know there is another bit of policy around large-scale shared living. I do not know whether there is any requirement. It is just open and unspecified at the moment.

The other point I would say is - and this might come up in other questions - that how those sites are accessed, whether community groups are really involved in the design at all or, once a site is identified, who the landowner is and who is doing the development probably have a much greater influence than this document does not necessarily allow a community group to be involved or to have a voice in that process.

Elly Baker AM: Yes, that was really helpful. We are going to come back to that a bit more, but that was really helpful. David, do you have anything to add on that?

David Ogunmuyiwa (Founder, ArchitectureDoingPlace and Mayor's Design Advocate): I broadly agree with that. It sounds to me like there is a broader, wider question that has all scales and typologies about how we live and the amount of choice we have over how that is and whether it is shared, who delivers that, who brings that forward and how they are supported. I know Lev's organisation does brilliant work.

Alan Smithies (Senior Strategic Planner - Planning, Greater London Authority): Sorry, do you mind if I just come in? I guess it was just about the point - and Matthew already mentioned it - about how the document is about the process of design codes. We have tried in the document to highlight getting that right balance between flexibility and being too prescriptive. That comes to some of your points about delivering housing that might have to suit different needs. Getting a balance between those two things is important when thinking up design codes and creating these design codes. You will need to be quite prescriptive in certain aspects, but you will also need to leave flexibility in other aspects, being aware that people like to live in different ways.

Elly Baker AM: That is helpful. Thank you. I suppose we will take a view about whether neutrality is enough and what we need in this particular document or whether we would want something stronger than that.

Sakina Sheikh AM (Chair): I will flag that on the question around diverse communities and how small sites can help deliver housing, I know that we will be bringing Ilinca in very soon to discuss Gypsy, Roma and Traveller communities and how small sites can help further the agenda of ensuring adequate housing for the communities that you work with. I will pass over to Assembly Member Berry.

Siân Berry AM: Thank you very much, Chair. Yes, I wanted to go back to some of the issues that I brought up at the last part of this session around housing design codes in specific relation to small sites. I am looking at David there because he might be the best person to answer this question. Also, it was brought up by Emma from Lewisham and this idea of gardens being things that need to be more protected.

Are you confident, David, that the new guidance here will prevent the selection of play space and green space as small sites? I do see that across London, particularly on estates, and councils selecting the play space and the green space that exists as somewhere to build upon. Are you confident that that will be prevented by this?

David Ogunmuyiwa (Founder, ArchitectureDoingPlace and Mayor's Design Advocate): How best to answer that question? That often starts with who is running the design code and who is the author and owner of that design code and who is sharing it. Enlightened developers like in Emma's department are really aware also of the communal space and the other benefits of space and they do not build on green space.

I am not sure that that is particularly a design issue at that point. What we would always try and do is design to maximise the space. Apart from anything else, we are also thinking about complying with lots of guidelines that mean you have a certain amount of amenity space, a certain amount of children's play space, certain access to natural daylight and certain access to dual aspects where possible. There is a bunch of technical criteria that we have to meet. Even beyond that, our own particular values mean that we are always trying to maximise that.

Once you are having these conversations, from my experience, with people about the character of where they live, these things come up really quickly and they come up really early. Then we can start to have that conversation. In that context, then, certainly, this allows that conversation to take place in a very structured, straightforward and honest way.

Siân Berry AM: Yes. The other thing that you sort of hint at there is the impact that taking away that green space might have on the amenity of the surrounding area. I am not sure that that is being treated as a planning consideration when selecting a site for a development. The site is required to provide for the residents in the new development with this amount of space, but the impact it has had on the people around is not particularly considered. That is not so much in the small site's design itself, but it is in the selection of the small site that that can have an impact.

David Ogunmuyiwa (Founder, ArchitectureDoingPlace and Mayor's Design Advocate): That is fair enough. Part of other roles that I do is also design review and that is one of the things we always pick up. One of the things I enjoy about this document is the use of the word 'incremental' because it puts a responsibility on everybody who is wielding this to understand that that is part of a broader neighbourhood. It is not just by itself. It is not just in isolation. It is part of a neighbourhood. It needs to contribute to that, not extract value, opportunity and amenity from it.

Siân Berry AM: Finally, I wanted to ask your view on the example given in the guide. Sorry to refer to a page number, but it is figure 4.8 on page 21. I do not know if you have it in the guidance. It is a worked example of what you do with green cover and landscaping on a back land site. I looked at that and was quite disturbed by

it. In the site as it stands, which is some garages and it has some green space within that and a tree, two of the things that have big green ticks by them on page 22, the next page, take away the tree for what I can see is no good reason and also just build willy-nilly over the existing space. To my mind, as someone who is interested in biodiversity more generally, it is green and there is a green roof put up there, but you are paying no attention to the really valuable biodiversity in the soil and the land that is there. There is nothing in the guidance that says to preserve the footprint of the existing green space if you can. I can see loads of reasons I would object to those developments there that have the green ticks on them because they are not preserving. They are merely re-providing and often with a roof instead of ground. Do you have a comment on that? Perhaps we can ask for that to be improved.

David Ogunmuyiwa (Founder, ArchitectureDoingPlace and Mayor's Design Advocate): That is a fair comment in this particular instance and that particular drawing. Again, it is unusual that we are getting rid of trees. We are often not allowed to. They are often protected. I imagine that if this was part of a conversation about this design code, a lot of people would say similar to what you have just said. But from my point of view as a designer, that helps guide what we then provide. This is not a thing that we have to follow. This is a guide. This particular drawing is not something we have to follow slavishly.

Siân Berry AM: Alan, you have put your hand up.

Alan Smithies (Senior Strategic Planner - Planning, Greater London Authority): Yes. I just want to recognise that that is a good point you raise. I agree. I know it is about a process. but I guess it is also about the direction that we are showing here. Probably the removal of that tree does not set a great precedent.

Siân Berry AM: It might set a nasty precedent that we then spend our time trying to defend later.

Alan Smithies (Senior Strategic Planner - Planning, Greater London Authority): Yes.

Siân Berry AM: Thank you.

Sakina Sheikh AM (Chair): Thank you very much, Assembly Member Berry. Now over to the Committee's Deputy Chairman, Assembly Member Best.

Emma Best AM (Deputy Chairman): Thank you. Good afternoon, everyone. Matthew, coming to you first, how effective does the Small Site Design Code's LPG balance certainty and flexibility?

Professor Matthew Carmona (Bartlett School of Planning UCL, and Chair of the Place Alliance): It comes back to a point that has been made a few times. In a sense, this is about setting out a process that others will then follow. In that sense, it is codes that are produced by the local authorities or the developers that follow on from this that need to balance certainty and flexibility. That is always a challenge. I would tend to say that codes produced by authorities should try to concentrate on those matters that are really critical. Trees was one of them that was just mentioned and the preservation of trees or planting of trees. Those types of factors are seen as really critical for the public interest. Publicly produced codes should try to steer away from factors that are maybe less significant for the public interest, like the style of the architecture, for example. In that area, there might be more flexibility.

But as far as the LPG itself, it sets out a process that hopefully others will follow, but it is not saying and it should not say, "You should do this, this, this and this". There needs to be flexibility in the system to recognise the fact that every local authority is different. They have different inhouse capacity and design

skills. They are structured differently, and they have different issues on the ground. Therefore, they need to be able to flex the process to meet their own particular requirements. The balance is right in this document.

Emma Best AM (Deputy Chairman): Thank you. Alan, I just wanted to ask you off the back of that last conversation, what stood out to me was the word 'underused' in the LPG. Siân was touching on the green space and playground space, which often is termed 'underused'. As well, we see it with surface car parks on high streets, 'underused'. Could the LPG go slightly further in determining what underused looks like, which may serve some of those protections?

Alan Smithies (Senior Strategic Planner - Planning, Greater London Authority): Yes, I am sure it can do. We have tried to do that by providing some of the images throughout the document. We have tried to provide images that show, if it is an underused car park or a set of garages, for example, to illustrate that that is what we mean. But if it is not clear enough, then that definitely would be something that we could look into.

Emma Best AM (Deputy Chairman): Yes. An image can be interpreted a million ways for a million different purposes depending on how one might want to interpret. Some wording around that that better specifies what 'underused' means would be much appreciated. Emma, coming to you, please, in your view, does the LPG ensure suitable protection for existing communities, businesses and family homes currently located on what would be considered small sites?

Emma Talbot (Director of Planning, London Borough of Lewisham): I go back to what Matthew has said. For me, the LPG sets out a process and it is for the local authority to make sure that when it is recognising certain types of small sites and what is valuable and building on that. You are talking about underused. When you said that, I wrote down, "By whom?" It is a question to ask. The role of the LPG, for me, can really set those early questions and those early conversations that need to be had around how something is used and being honest about that because, generally, it is valued by someone. I am not sure that there is any such thing as an underused green space anymore after the last couple of years. There probably was a couple of years ago, but I do not think there is anymore.

We do have a housing challenge, though, and these things are going to happen. I come back to that earlier point of making sure it is good. It is within the ability of a local authority within its design codes to say that, on the role that a small site is playing, it may be that it is playing such an important role that it is not suitable for redevelopment. For us in Lewisham, we need more family housing. Our larger sites tend to come forward with smaller units, which means that we want to protect our family homes and we have policies within our local plan that protect those. It is part of that suite. It will not be the only answer. It can be a really useful toolkit for setting out how we think about things, the types of questions that we ask and the types of conversations that we have had so that we have something locally specific.

Emma Best AM (Deputy Chairman): That flows really well into my next question I was going to put to you, Emma. Do you think that the design codes can be used effectively to protect suburban character, especially low-rise neighbourhoods where those existing family homes are, that we know there is a shortage of growing in London and you have just confirmed for me in Lewisham, too?

Emma Talbot (Director of Planning, London Borough of Lewisham): Yes, definitely. This is where they can be really valuable in those street situations where we have the infills. One of the things that we have developed in the code and an area of debate with the architects that we had working on this was the importance of the building line and floor-to-ceiling heights. I was pretty fixed on consistency. There will be departures because we live modern lives now. When you are in a Victorian terrace, if you are going to meet

current building regulations, you cannot just rebuild what was there. It has to be that modern interpretation. What we have set out is how you take the cues from the street on what is valuable.

Also, importantly - and we have just touched on this - that balance between certainty versus flexibility. One of the things that we have done and the ability of this LPG that is in there is that it sets design vision. That is the thing that holds through everything. There is always going to be one site that is so special and unique that it needs its own solution. But what you cannot waver from is that vision, that quality and that process. There are the tools in this to do that and to look at those situations really well.

Emma Best AM (Deputy Chairman): Thank you. Just moving back to you, Matthew, what opportunities would design codes offer to support cohousing or community-led housing schemes on small sites?

Professor Matthew Carmona (Bartlett School of Planning UCL, and Chair of the Place Alliance): They would not offer more or less than for any other type of housing. One thing that we have to remember is that the design code is just a tool and it is part of a suite of tools that starts from the London Plan and has all the different types of London-wide guidance and then the local authority has its plan and has its guidance and so forth. It is entirely appropriate that particularly in local plans and in the London Plan that there are policies that deal with different types of housing, housing need and so forth. It is not necessarily the sort of thing that you find in a design code, because a design code tends to deal with more the physicality of the place, the structure of the place and so forth, but it needs to work hand in hand with the other tools at the disposal of the local planning authority.

Emma Best AM (Deputy Chairman): Thanks, Matthew. Lev, can I put the same question to you, please?

Lev Kerimol (Community Led Housing London): Yes. I would agree with that. If it is just a design code, it does not do much. The bit in this document that is potentially interesting is where sites are being identified on a map. That is potentially quite radical because it implies something a little bit like the Strategic Housing Land Availability Assessment (SHLAA) process, where landowners who may have a site identified go, "Hang on. I did not think I could develop on that", but it is implied that maybe you should consider developing that. I was just trying to look at the Lewisham document, which is really great, by the way, but I do not see that they have identified particular sites. Yes, that is interesting. Even that really does not provide any support for cohousing, community-led or self-build even, even though it is potentially quite common for very small sites to be one dwelling intended for the future resident. You would probably need to go a step further and designate them in some way or designate a proportion of them to say, "This is specifically for self-build, community-led, cohousing or whatever", if you wanted to go that way.

Emma Best AM (Deputy Chairman): Yes. I have one final question on those small sites and coming back to you, Emma. I thought it was really important when you raised it earlier. The earlier you get the community in and are honest about the challenges, like you, I agree, the better. The community then is best placed really to pick up those small sites. The earlier you can get the community into that conversation saying, "Where could we build? Where would be acceptable?" Small sites are often very hard to find and are often those little nuggets that local authorities have not seen, a certain batch of garages or something like that. How have you done that effectively and how could that be perhaps bulked up in the LPG? Perhaps some more guidance on the local consultation bit and identifying small sites would be helpful.

Emma Talbot (Director of Planning, London Borough of Lewisham): Yes. As our SPD predates the LPG, we have not gone and identified specific sites. We have mapped the London Plan policies about highly accessible locations and things like that. We have looked more at types. We are really proud to have in

Lewisham two neighbourhood plans that have been through their referenda and are adopted. Working with our neighbourhood groups for them to identify where there are local opportunities has worked well.

Yes, it is something that is really hard to do as a local authority. If you want to have honest conversations about how something is valued and you are shading on a map, there is a big risk of getting that wrong. To do that genuinely would be a significant piece of work. Where we have those neighbourhood groups - and we do not have them everywhere - that has worked really well and is perhaps complementary to the work that we do with this SPD, with our alterations and extensions one, with that suite of documents and also with some of the master-planning that we have done. We have gone out with groups early on and walked an area with them and asked them what they like about it, what they do not and the things they want fixed. We have used that to inform our New Cross masterplan. Some of those sites are on a bigger scale, but that is incredibly intensive. It is really valuable, but you have to do that well. That would be a massive task.

Sakina Sheikh AM (Chair): Thank you very much. I am just going to bring in Assembly Member Berry.

Siân Berry AM: Yes, I just wanted to come back to Lev from Community Led Housing London. You were very polite just now. You said something along the lines of, "For the small sites policy and the identification of sites to be useful to community-led housing, there would need to be some kind of designation". Do you want to just ask us for that so that we can maybe consider it as a recommendation in a more direct way? Not that we can provide it, but would you want that to happen?

Lev Kerimol (Community Led Housing London): I know, for example, in Switzerland that I visited recently and probably similar things in Germany where, specifically in their SHLAA or equivalent documents, they will say, "This is for co-operative housing. This is for other housing or conventional housing". Something like that

--

Siân Berry AM: We have discussed places like that in the Committee before, yes.

Lev Kerimol (Community Led Housing London): If you do not have something like that, all you are doing is identifying sites that the landowner will develop in the conventional way or sell and it will be the same competitive process. Currently - and this is just a bit of background, I suppose - most of the community-led housing projects are hugely dependent on council-owned sites and it is the goodwill of the council. Even if a group is not necessarily trying to achieve higher than policy levels of affordable housing, just having the time to pull the money together to make an offer for a site or have that somewhat deferred and make it subject to planning is something you would not really have the opportunity to do with a private-sector landowner. Unless there is some other planning policy designation, I do not see how that is going to happen. I can see it is quite challenging to do that and pick on individuals and say, "All right, you are going to have this suppressed land value whereas someone else is not", and so I do not know how you would go about deciding which sites should be more suitable for community-led housing as opposed to others, but it would be the thing that makes it beyond just identifying sites, I think that is all fine, but relatively passive.

Siân Berry AM: Fair enough. Sorry, the Housing Committee has previously looked at considering policies like that and it has been for public land specifically.

Sakina Sheikh AM (Chair): Thank you, Assembly Member Berry. I am going to turn to Ilinca. It is great to have you join the Committee this afternoon. I know that we have been working closely with you to, firstly, have a site visit more recently with the London Gypsy and Traveller community and so it is really fantastic to have you here to build on that work. The first question we wanted to put to you is: how important are small sites when it comes to Gypsy and Traveller accommodation?

Ilinca Diaconescu (Policy and Campaigns Co-ordinator, London Gypsies & Travellers): Thank you very much. I am Ilinca Diaconescu, Policy and Campaigns Co-ordinator at London Gypsies & Travellers. As land availability for Gypsy and Traveller sites is one of the key barriers and through site allocation and local plan processes we have probably had only a handful of site allocations coming forward across the whole of London in the last 10 years or more, that is not really an effective process to identify land to meet this accommodation need. Similar to what Lev was saying, it is highly dependent on council and public-owned land.

We see small sites as a potential source of more likely possible locations, especially as it can be a proactive exercise that is in parallel or outside of the local plan processes. In talking to members of Gypsy and Traveller communities across London, people are increasingly more in favour of smaller sites that can accommodate a group of families or extended families. They can be more viable, deliverable and easier to manage as well. Quite a few community members are identifying themselves different locations in their boroughs for small sites, but are not always sure what the process is. If it does not happen to fall within a local plan consultation period, it is quite difficult to bring those up with local authorities. This can be a really good opportunity.

As well, in the history of how a lot of local authority Gypsy and Traveller sites have been built in London, they tend to be 10 and 20 pitches. There are some outliers that are 30 or 40 families. Those are quite large sites, but there are quite a few examples of smaller sites from a one-family pitch in a terrace-housing strip in Camden, another one on a street corner, some other street-facing sites in Hackney and some other back land ones that are all under the 0.25-hectare limit. I am not saying they are very well designed necessarily, but they are examples of what exists in London in this kind of diverse accommodation provision. Also, I have seen a couple of boroughs are making some allocations in local plans for smaller sites.

It would be beneficial to have Gypsy and Traveller accommodation alongside other specialist housing mentioned explicitly when we talk about design codes, I would say particularly because there is no design guidance or standards for Gypsy and Traveller accommodation at the moment. There was national guidance, which was deleted in 2015. There is not much in terms of good practice, innovation or conversations between community members, architects, designers and planners to drive forward this type of housing provision in a way that is up-to-date and modern and can really help to reframe how Gypsy and Traveller accommodation is perceived and how the communities are treated and perceived by neighbours. Having some kind of design guidance standards can help with reframing those perceptions and also ensure higher environmental quality, because a lot of Gypsy and Traveller sites historically have been located in very poor-quality areas. This would all contribute to more inclusive and more integrated provision for the communities.

This is in terms of the small site design codes. I agree with colleagues and people here who have said we do not necessarily need something very prescriptive, but actively mentioning these different types of accommodation to encourage developers, local authorities and so on to actively consider types of housing that are not as viable is really important.

Separate to that because small sites is only one part of the potential delivery of Gypsy and Traveller accommodation, there is, from my perspective, a need for London-wide design guidance or standards for how this type of accommodation is delivered and managed. We feel there is a more important role that the Greater London Authority (GLA) can take in driving that work forward to fill that gap as there is not any kind of national, London-wide or local guidance.

Sakina Sheikh AM (Chair): That was incredibly helpful. Thank you. I hope that colleagues will be listening to what you are saying. It feeds into a lot of what Lev has been talking about in terms of site allocation

designation and the benefit of doing that, particularly hearing from you, for the Gypsy and Traveller community.

Alan, this is for you from the GLA perspective in terms of how you can encourage councils to do this, but also, Emma [Talbot], if it is all right to bring you in in terms of the capacity for local councils to do this, which is indeed to be able to designate small sites either for community-led housing or, as Ilinca has talked about, the Gypsy, Roma and Traveller accommodation. What is the capacity for that and the likelihood of it? What have the conversations around that been like?

Alan Smithies (Senior Strategic Planner - Planning, Greater London Authority): Yes, thank you very much for that. We hear that and that makes a lot of sense. One of the things that came out of the most recent consultation is just about, when identifying small sites, should we be making a bit more reference or pushing authorities to consider the wider housing need of a plan area? That might include things like Gypsy and Traveller accommodation and other forms of specialist housing.

Matthew touched on it as well earlier, but just reiterating that small site design codes generally are aimed at the more replicable types of sites. We have been clear in the guidance that you can be identifying small sites. That is probably going to be on the larger end of small sites. It is at that stage that we are starting to think that maybe we can provide a bit more wording to say that you should be considering these wider housing needs and it might be possible that particular sites are more suitable for Gypsy and Traveller accommodation or, indeed, through that process of identifying sites, it might come up that a community-led housing trust could take advantage of a particular site and that would be the starting point of that. Again, these are for those specific sites, which are likely to be the kind of more unique sites, and then the design codes per se are for those more replicable types of sites like your upward extensions or your infills on streets. That is what I wanted to add there.

Sakina Sheikh AM (Chair): Can I just come back? It does sound like between now and autumn there is the possibility that we might see in the final guidance specific mentions of specific types of accommodation that could be better placed for small sites, whether that is Gypsy and Traveller accommodation or community-led housing. To have that specificity in the small sites LPG that will be released in the autumn could be very beneficial as the local guidance. It sounded like that was close to a commitment from you.

Alan Smithies (Senior Strategic Planner - Planning, Greater London Authority): I might have to defer to Elliot. I do not know about a separate piece of guidance if that is what you are talking about.

Sakina Sheikh AM (Chair): Not separate; integrated in the current piece of guidance.

Alan Smithies (Senior Strategic Planner - Planning, Greater London Authority): Yes. Potentially what we are looking at is adding in some wording to make it clear that at a particular stage in the process local authorities or neighbourhood planning groups should be thinking about the wider needs of the plan area. That might be Gypsy and Traveller accommodation, or it might be an opportunity for community-led housing, for example.

Sakina Sheikh AM (Chair): If you are looking for feedback from the Committee, it is clear that that is something we would be really supportive of and so we really hope that has been taken on board. I will let you continue on to your second point.

Alan Smithies (Senior Strategic Planner - Planning, Greater London Authority): OK. That is good to know, then.

Your other point was about what the capacity is to do so. Ultimately, we are asking local authorities and neighbourhood planning groups to go through an area analysis, and it is all part of a process and a suite of documents through the characterisation and growth strategies. Ultimately, we are trying to provide tools and levers and encourage those authorities to do certain things. Our approach is that they are already doing these exercises. It is a case of, "OK, right we have identified this particular site. This could be useful", and that is the opportunity to then think about how best this site is provided or re-provided. I do not know if that answers your question or not.

Sakina Sheikh AM (Chair): I am satisfied with that. Thank you, Alan. Emma, just from a local authority perspective on the point around the specificity of the type of accommodation that could be designated on small sites, do you have any thoughts on that?

Emma Talbot (Director of Planning, London Borough of Lewisham): Yes. It is a really interesting question. I have been sitting here mulling it over as I have heard it. In the way that we have approached it, what there is the opportunity to do with a small sites design code is to show people there are opportunities on these sites. Some of the people that we want to speak to are those community-led housing. I have to say the Gypsy and Traveller community is not one that feeds into and is reflected in our small sites SPD. That said, we have been through a separate site selection process and we are allocating a site in our local plan, which is about to go to regulation 19 stage. It is an interesting point about that as a missing item because there is certainly the willingness to do that. More guidance around that is helpful, not only to identify suitable sites, but that is a type of accommodation that causes lots of comments and lots of objections painted as, "Surely this site is not suitable". To be able to helpfully say, "Good news. It is", would be a really worthwhile role of that.

To go back to the community housing, we have a really strong history in Lewisham of community-led housing and some really successful sites, some recent that are onsite in Church Grove and others that have been there for a very long time with our Segal houses in Nubia Way. That is something that we have approached as an opportunity. We have not designated any land for anything in the code, but promoting the ability of a small site on its own might not be suitable, but a collective coming together and helping community groups to be competitive in a competitive market because that is not something that the planning system can remove from the process unless it is a local authority being involved in providing the land.

I do not have the answers to either of those, but they are really good points. There are the hooks within there that at a local level we all start to think about and how we can best do it. When they work well and they are planned well, people live better lives in housing that they can afford with connections to the local area. Their children go to our schools. That improves everybody's lives. It is really worthwhile as an extra piece of work for us to focus on.

Sakina Sheikh AM (Chair): That is fantastic. It sounds like perhaps one follow-up from this might be you and Ilinca having a catch-up in Lewisham sometime that I might gate-crash. We are ahead of time, which is good news for everyone, and so I am going to use this as an opportunity to ask the Committee Members if they have any follow-up questions that they wanted to ask or, otherwise, a one-minute conclusion from any of our guests who feel like they might not have said everything that they came to say. I will start off with Committee Members if there are any remaining questions you have. Assembly Member Boff?

Andrew Boff AM: Only to Ms Diaconescu. I just wondered. Do you think that this design guide is going to prevent this situation of Gypsy, Roma and Traveller sites being put next to motorways?

Ilinca Diaconescu (Policy and Campaigns Co-ordinator, London Gypsies & Travellers): I do not know what is going to be in the design guide and so --

Andrew Boff AM: It does seem to be the default position sometimes for local authorities that they put these Traveller sites in the most inhospitable spaces. Then they put them in their planning documents and they spend years and years working towards those particular sites, only to discover that it is an unhealthy place for people to live. Do you hope that these guides will prevent that situation from happening again?

Ilinca Diaconescu (Policy and Campaigns Co-ordinator, London Gypsies & Travellers): If the design guides are seen alongside other processes like identifying land more proactively and looking at more potential locations, if we have a design guide that reframes what Gypsy and Traveller accommodation is meant to be, which at the moment is perceived as something that is out of sight, does not look very good and is not in a good location, and if it starts to build that bridge and make it more acceptable and normalised as a form of housing and a type of accommodation that meets diverse needs and is more integrated in a local neighbourhood, yes, it can have that effect in the longer term. Hopefully, really terrible locations will be avoided.

Andrew Boff AM: Thank you very much.

Sakina Sheikh AM (Chair): Yes, I reiterate that. Thanks. It is also worth saying that so much of what the Committee has heard both here and also at the site visit is really informing the needs assessment that the GLA is undertaking. Assembly Member Boff is correct to highlight that what we are keen to do at the GLA is push local councils to do better. Part of doing that is having a more expansive definition of what it means to needs-assess the Gypsy, Roma and Traveller communities so that you include those who are in bricks and mortar as part of those who should still have accommodation provided. I know that work is ongoing for the next eight months and we will continue to be working with you on that.

All right. It is nearly a wrap, folks, unless anyone on the panel would like to add any final closing comments? Please, David.

David Ogunmuyiwa (Founder, ArchitectureDoingPlace and Mayor's Design Advocate): Thank you. I just wanted to say for the record that one of the things I appreciate about this document is in particular - Emma mentioned earlier a simple question, there is also a simple question about who designs London. London has been particularly bad at that over the years. A diverse authorship and diverse involvement in the conversation about local environments is really important for everybody to feel part of, both at a community level and also at a consultant level. I was really interested in the conversation about local authority capacity and how consultants might contribute to that. There is lots of, frankly, capacity in other places that has not always been thought about in that context. That helps with local democracy and people buying in. It is not just this expectation in certain dense, complex, inner-city areas about privileged people designing commodities and homes for even more privileged people. It is about how everybody, for the benefit of all Londoners, can have access to small development opportunities and improve the volume of small housebuilders across communities and contribute to those economically as well as local businesses and so on. That is a really important and under-rated aspect of something that this document begins to define and specifically target.

Sakina Sheikh AM (Chair): Absolutely. I could not agree more. Particularly post-pandemic, people's lived experience of their local areas are particularly heightened in their minds, which is why the Committee was keen to explore it in this session. Thank you for highlighting that point.

Lev Kerimol (Community Led Housing London): I might add something that might not be directly linked to this document, but to the conversation around designation and the link between community-led housing and small sites. There definitely is a link, but it is also not to forget that it might be suitable to include community-led housing on larger sites. The National Planning Policy Framework talks about identifying the demand for people who want to build their own homes, things like self-build and so on. Many local authorities outside of London see that as on larger sites, a proportion of the plots might be for self-build. In London, clearly, there is not that much individual one-off houses happening on larger sites, but thinking about blocks. Maybe a large developer is codesigning and coproducing with a group and the ownership then transfers. It does not have to be that the community group has to do the develop itself as long as it is involved in that process. Maybe having a proportion of a 1,000-unit scheme, a small block, going to a community-led group is also worth thinking about.

Sakina Sheikh AM (Chair): That is really helpful food for thought. Finally, Matthew.

Professor Matthew Carmona (Bartlett School of Planning UCL, and Chair of the Place Alliance): Just to make the point, these sorts of design codes are so fundamental. For too long, we have relied on words in plans. This is about getting in place that physical skeleton of the city on which a really good city made of really good-quality places can grow. This is a really welcome document and the GLA should really push hard to get this implemented down at the borough level.

To come back on one last thing, on the Gypsy and Traveller issue, it seems to me that we have heard that there is no national guidance anymore and there is no London-wide document. Not necessarily in this document, but it seems that there is a big gap there for some London-wide design guidance for sites for Gypsies and Travellers.

Sakina Sheikh AM (Chair): That is what we are working on. That is really helpful and a really positive note to end on. The Committee hopes to work with you all again in the future and we have really valued your contributions. Many thanks for coming and joining us today.