

GLA Planning

# Design and Characterisation London Plan Guidance

## Consultation summary report

June 2023

## Copyright

### Greater London Authority

June 2023

For more information about this document, please contact:

The London Plan Team, GLA Planning

Greater London Authority

City Hall

Kamal Chunchie Way

London

E16 1ZE

[www.london.gov.uk](http://www.london.gov.uk)

Tel 020 7983 4000

Email [planningsupport@london.gov.uk](mailto:planningsupport@london.gov.uk)

### Other formats

If you require this document in a more accessible format, please get in touch via our [online form](#) and tell us which format you need.

## Table of contents

1	Introduction.....	4
2	Who took part? .....	5
2.1	Respondent demographics .....	5
3	Consultation feedback and GLA response .....	6
3.1	Summary of Characterisation and Growth Strategy LPG consultation responses .....	6
3.2	Summary of Small Site Design Codes LPG consultation responses .....	15
3.3	Summary of Optimising Site Capacity: A Design-led Approach LPG consultation responses .....	23
3.4	Summary of Housing Design Standards LPG consultation responses .....	31
4	Next steps and monitoring .....	39
Appendix 1	Summary of engagement.....	40
A1.1	Informal and/or early engagement (prior to first consultation) .....	40
A1.2	Formal engagement on Good Quality Homes for All Londoners (first consultation: 13 October 2020 – 15 January 2021) .....	40
A1.3	Formal engagement on Design and Characterisation LPGs (second consultation: 11 February – 27 March 2022).....	41

## 1 Introduction

Between 11 February and 27 March 2022, the Greater London Authority (GLA) carried out a consultation on the Mayor's draft Design and Characterisation guidance. This guidance is made up of four London Plan Guidance (LPG) documents:

- 1) Characterisation and Growth Strategy LPG
- 2) Small Site Design Codes LPG
- 3) Optimising Site Capacity: A Design-led Approach LPG
- 4) Housing Design Standards LPG

These documents supersede the draft Good Quality Homes for All Londoners suite of documents, which were publicly consulted on between 13 October 2020 and 15 January 2021. This original suite of documents was broken down into four 'modules'; however, as a result of the first public consultation, the original draft Good Quality Homes for All Londoners documents were revised significantly and each 'module' was renamed as per the above list. In addition:

- significant changes were made to the content for each 'module', with 'module A' being split into two separate documents (documents 1 and 3, above)
- the structure and format of each LPG was amended to conform to the new LPG template and format
- 'module D', which had a list of case studies, was removed. A list of case studies will now form a different document/project that aims to showcase best practice exemplars.

Collectively, this new suite of documents (see 1 to 4, above) is now referred to as the Design and Characterisation LPGs, rather than the Good Quality Homes for All Londoners suite of documents.

This report provides a summary of the consultation responses received during the second public consultation (following the first, which was carried out on the superseded Good Quality Homes for All Londoners suite of documents). The full consultation summary report for this first consultation can be viewed [here](#). This report identifies the key issues that were raised on the documents consulted upon, as well as any issues identified in both consultations, and has provided a GLA response to these issues. A specific question was asked in each survey (for each LPG) about whether there were any specific matters, raised in the first consultation, that had not been addressed in the second-consultation documents.

This summary includes responses received via the online survey and email, as well as during the virtual events. The Mayor would like to thank everyone who took part for engaging with the guidance. Appendix 1 includes a breakdown of all the engagement events that were held in both the first and second consultations.

## 2 Who took part?

Throughout the consultation period there were 394 attendees to virtual events<sup>1</sup> and 604 unique visitors to the consultation webpage, resulting in 2,253 page views of the consultation webpage. In total, 142 responses were received from 78 consultees during the consultation. Of the 142 responses, 59 were received through the Bang the Table surveys and 83 via email. This document provides a summary of all the responses received, including those received via the surveys and emails.

Information on those who took part in the consultation is taken from information submitted alongside consultation responses. There is limited data available about event attendees and those who responded via email. Therefore, the data on who took part represents only a sample of those engaged with, and may not reflect the true breadth of engagement. Survey respondents were asked whether they were responding as an individual; and, if not, what type of organisation they represented. The respondent types are broken down in the table below:

Respondent type	Number	Percentage
Individual	6	10%
Business	17	29%
Campaign group	1	2%
Community group	6	10%
Government body or agency	3	5%
Local authority outside London	0	0%
London borough	26	44%
Professional body	0	0%
<b>Total</b>	<b>59</b>	<b>100%</b>

### 2.1 Respondent demographics

Survey respondents were asked equality monitoring information to assess how representative respondents were compared to the demographics of Londoners. However, as the number of responses received on those questions was limited, the relevant analysis has not been included in this consultation summary report.

---

<sup>1</sup> See Appendix 1 for a summary of the engagement events.

### 3 Consultation feedback and GLA response

#### 3.1 Summary of Characterisation and Growth Strategy LPG consultation responses

As part of the engagement on the draft guidance, respondents were asked to submit responses to specific questions. This section also includes responses through other engagement channels such as emailed responses.

**Question 1: Did you (or your organisation) respond to the previous consultation on Good Quality Homes for All Londoners LPG (GQHFAL) which ran between 13 October 2020 and 15 January 2021?**

Sixteen responses were received to this question through the online survey. Five respondents stated 'yes', while 11 responded 'no'.

Response	Number	Percentage
Yes	5	28%
No	11	72%
Don't know	0	0%
<b>Total</b>	<b>16</b>	

**Question 2: Does this guidance address your previous response?**

Twelve responses were received to this question through the online survey. One respondent stated 'yes', while five responded 'no' or 'partly'.

Response	Number	Percentage
Yes	1	8%
No	3	25%
Don't know	2	17%
Partly	2	17%
Other	4	33%
<b>Total</b>	<b>12</b>	

### Question 3: If not, please advise which specific matters have not been addressed in this LPG?

Five responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- There should be more emphasis on the **social and economic** elements of character for an area, not just the built form.
- **Density** is largely absent from the assessment of site capacity.

#### GLA response

This guidance sets out a revised process for undertaking a character assessment and growth strategy. While there are aspects that differ from previous GLA characterisation guidance, the expectation of undertaking a character assessment, and the resources and skills required, has not changed. There is a greater emphasis on the **social and economic** elements of character for an area, not just the built form, throughout the document. This includes more clarity on the 'character areas' (see GLA response to Q7 for further information about this). **Density** is one of many elements that contribute to the character of an area. As a result, this is highlighted in figure 2.5 within the guidance.

### Question 4: Do you have any comments about the information on page 4 and section 1 setting out how the guidance applies?

Eleven responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- **Broad support** for the information on page 4 and for the principles of a borough-wide characterisation and growth strategy.
- Would like clarification on the legal (hierarchical) application of the LPG documents in terms of planning policy. How does an LPG differ from **Supplementary Planning Guidance (SPG)**?
- Concern about a **digital** mapping approach in terms of implementing, monitoring, updating and funding it.
- The guidance should specify and recommend additional technical expertise/**specialists** on the process of characterisation, particular to heritage and the impact of tall buildings on the character of an area.
- '**Local Plan Making**' should be amended to state that 'Local and Neighbourhood Plan Making'.

#### GLA response

The GLA welcomes the **broad support** of the guidance. The role of LPGs is to provide further guidance to the policies in the London Plan. This term has replaced '**Supplementary Planning Guidance**', but the weight of the documents remains the same. This clarification is explained on the London.gov webpage under 'London Plan Guidance'. The role of **digital** planning is an important tool in the development of character assessments. Digital planning tools such as GIS and online engagement

tools allow for information to be presented and stored in an efficient way; and can also assist when reviewing this data. This guidance is aimed at local planning authorities (LPAs), and includes the involvement of **specialists** in urban characterisation and this has been made clearer in the LPG. Lastly, the ‘**Local Plan Making**’ title has also been amended to ‘Plan Making’.

### Question 5: Do you have any comments about engaging communities and neighbourhood planning as set out in sections 2.1, 4.1 and 4.2?

Eleven responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Additional **community engagement** may be time and resource-intensive [this was also raised in the first consultation].
- It would be helpful if further guidance could be provided on how this engagement ties in with borough’s **statutory obligations** for formal consultation.
- The recognition of the role of **neighbourhood** plans and their relationship with local plans is welcomed.
- Concern that **community engagement** will not be meaningful.
- Recommend that the guidance makes a clear distinction between engagement (of all forms) on the ‘design’ aspects of placemaking, and on the less tangible aspects of placemaking that are so important to people: protecting social heritage and social infrastructure (informal, not just formal); understanding local value and aspirations; acknowledging local needs and experience; improving integration and inclusion; and addressing inequality and the risk of displacement. This can be done through the use of ‘**active data**’.

### GLA response

The involvement of local communities is a crucial part of plan making. As a result, the process set out in the Characterisation and Growth Strategy LPG is clear about the importance of local **community engagement**. The guidance has been amended to clarify the importance of the collection of the social and cultural characteristics of a place. In particular, the guidance now advocates that character assessments should include the collection and analysis of ‘**active data**’ collected in collaboration with local communities. This aims to be more meaningful, and provides a greater opportunity to understand the local needs of an area. Further guidance has been provided on how the detailed community engagement ties in with a borough or **neighbourhood’s statutory obligations** for formal consultation.

### Question 6: Do you have any comments about collecting the characterisation elements, the typological approach or character types, including use of the London Historic Character Thesaurus as set out in sections 2.2-2.4?

Thirteen responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- The use of the **London Historic Character Thesaurus** (LHCT) is supported.
- The thesaurus is very detailed and may be difficult to use/classify **types**.
- Pleased that **heritage** has been identified as a core element of character.
- Welcome the reference to intangible elements of character.
- Concern that the guidance is too focused on the physical elements of character and not enough on the **social elements**.
- The guidance should be clearer about the difference between **character types** and areas.
- The reference to character types being the same as area types in the **National Model Design Code document** is not correct as area types are place-specific.
- Carrying out a **typological approach** in areas of diverse built form (such as town centres or the Central Activities Zone) will be complex and challenging.

### GLA response

To assist practitioners in using the **LHCT**, appendix 1 of the guidance aims to clarify some of the most common '**character types**'. The GLA continues to support the identification of **heritage** assets as an important part of characterisation. The GLA is working with Historic England to investigate the possibility of mapping character **types** at a London-wide level, which could be used by boroughs. It was also evident from the consultation that there is considerable confusion between the '**character type**', 'character areas' and 'area types' (referred to in the **National Model Design Code**). As a result, the structure of the guidance has been simplified to avoid confusion and the references to 'area types' has been removed. Advice on carrying out a **typological approach** in areas of diverse built form has been included in section A1.1 of the LPG; and aspects of **social elements** have been added.

### Question 7: Do you have any comments about the character evaluation process including character areas, defining boundaries and/or quality and sensitivity assessment and mapping as set out in sections 3.1-3.4?

Thirteen responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Defining **character areas** could include analysing aspects of social and cultural character as well as the built form.
- Confusion about the interrelationship between **character types** and character areas.
- Confusion about the methodology and suggestion that Stage 2 is restructured to include differently termed **criteria** than the ones in the guidance.
- It would be useful to bring the criteria in **Appendix 3** into the main part of the document.
- Character area **boundaries** should not solely focus on built and mapped character, but also functional character, such as where people live, work and shop.
- Guidance should recognise that drawing **boundaries** is a subjective process.

## GLA response

To address concerns raised, the section on '**character areas**' has been moved from section 2 to section 1. This has been done to simplify the process and highlight the differences between '**character types**' and '**character areas**'. The guidance has also strengthened its wording on the importance of social and cultural character. As part of this, the guidance has also been amended to advocate for the collection of 'active data' through engagement with local communities.

In Stage 2 of the guidance, the process has also been amended with different-termed **criteria** now used. This aims to ensure that the local authorities are able to evaluate character and the sensitivity of an area in the most useful and insightful way. A new illustration of '**character areas**' has also been added to the guidance to show the different areas and **boundaries**. **Appendix 3** has been kept as an appendix as this is considered to make the body of the document too large.

### Question 8: Do you have any comments about defining tall buildings as set out in section 3.5?

Eleven responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- It would be useful to include a **diagram** of the minimum definition for a tall building.
- Concern about the resource implications of boroughs having to set out in supporting text the **harms** that tall buildings would cause outside these locations.
- Requesting that boroughs set their tall building heights substantially higher than their surroundings would not work in areas of **existing tall buildings**.

## GLA response

An important element of Policy D9 (tall buildings) is the setting of a 'tall buildings' definition. The guidance does not advocate using a relative height as a definition; as such, the wording on this has been strengthened. A **diagram** was not deemed necessary for this section; however, the wording in parts of this section has been amended to clarify the process and minimum height definition allowed. Reference to an assessment of **harm** has also been clarified in the LPG. This includes clarifying that step 1 of the section 4.4 is a high-level assessment of sensitivity and does not require a significance-based assessment of heritage **harm**. This aims to 'screen out' inappropriate locations that do not warrant further consideration. Nevertheless, boroughs are still advised to document the reasons why tall buildings are inappropriate in these areas. The guidance has been amended to consider **existing tall buildings** areas when setting a tall building definition.

### Question 9: Do you have any comments about identifying areas suitable for different levels of change and the capacity of an area for growth as set out in section 4.3, and the use of conserve, enhance or transform areas?

Twelve responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- The approach is supported and well considered.
- It would be useful for the guidance to provide further detail on how boroughs should get from the **quality and sensitivity assessment** and mapping, to the areas of change.
- Suggestion that LPAs could use blurred **boundaries** between areas (shading) instead of fixed boundaries.
- Concern around carrying out the process when using the **capacity for growth** and change matrix (particularly for the extreme ends of the spectrum).

### GLA response

In response to comments and concerns about the ‘**capacity for growth**’ section, this section has been revised. The matrix illustration has been removed, and the text has been moved to a new section that separates out the process of identifying change and identifying an area’s **capacity for growth**. Figure 4.8 has also been added to the document to clarify the concept that two conserve areas can have significantly different **capacity for growth**. This amendment to the guidance, along with others, is intended to provide greater clarity on how boroughs should get from the **quality and sensitivity assessment** and mapping, to the areas of change. The guidance uses clear **boundaries** to provide clarity over which level of change a particular site is in. The document has been amended to provide more guidance on defining the **boundaries** of the areas which are categorised into different levels of change.

### Question 10: Do you have any comments about developing area-wide visions and policies as set out in section 4.4?

Eleven responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- The approach is **broadly supported**.
- It is helpful that a coherent or comprehensive approach to **masterplanning** is encouraged in areas undergoing significant change or where there are multiple development sites.
- The guidance could provide more insight into what aspects could be included in a **vision** for an area.
- The term ‘design vision’ should be amended to ‘design **aspirations**’.
- This **section should be moved** so that it follows the sensitivity assessment of tall buildings.

### GLA response

The GLA welcomes the **broad support** for this section and approach to **masterplanning**. However, to make the process clearer, a number of amendments have been made. Most significantly, the **section has been moved** to fall after the ‘locations where tall buildings may be appropriate’. This has been done to set out a

more coherent sequencing of the process where an area's sensitivity to tall buildings (and determining of appropriate locations) is determined before setting area-wide **visions** and policies. The guidance now references an area's **aspiration** as part of the scoping for tall buildings.

**Question 11: Do you have any comments about defining locations where tall buildings may be appropriate as set out in section 4.5?**

Fourteen responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Concern about further tall buildings in London, but would welcome **mid-rise**.
- Concern about the resource implications and practicalities of assessing the potential **harm** of tall buildings.
- Suggestion that the guidance specifically advocates for **specialist** input in developing and applying methodologies for assessing the sensitivity of areas to new tall buildings.
- Suggestion about splitting the **sensitivity assessment** into absolute constraints (e.g. CAA safeguarding, Green Belt) and constraints that need more analysis.
- Suggested amendments to **table 4.2** including the recommendation that a significance-based approach, rather than an arbitrary figure of 50m for sensitivity, would be better.
- There is a risk that heritage assets will not be given proportionate consideration in the plan-making stage, which will make them vulnerable later to insensitive development. This risk is particularly high in areas that have lots of **designated assets** (and thus are generally more sensitive) as they will take longer to carry out a sensitivity assessment.

**GLA response**

The location and height of tall buildings are central elements of Policy D9 of the London Plan. As such, this guidance sets out a four-step process to determining if and where tall buildings are appropriate. The guidance is now clearer that built environment **specialists**, such as heritage and conservation officers, should be involved in the process. It also highlights the opportunity to build at **mid-rise** rather than high-rise. To provide clearer guidance, the **sensitivity assessment** (at step one) has been amended to remove reference to a significance-based assessment of **harm**. This decision was made because it has been acknowledged that this would be too onerous for a local authority to undertake. Instead, step one focused on a high-level assessment of sensitivity, which will screen out areas that are inappropriate for tall buildings and thus avoid undertaking unnecessary detailed analysis of them. This aims to avoid a scenario where areas with lots of **designated assets** take longer to assess. Suggested amendments have also been incorporated into **table 4.2**.

**Question 12: Do you have any comments about applying a characterisation and growth strategy as set out in section 4.6?**

Eleven responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- The approach is **broadly supported**.
- Recognition in paragraph 4.6.1 that a characterisation and growth strategy should **inform local plan or neighbourhood plan policies** is supported.

### GLA response

The GLA welcomes the **broad support** for this section. To highlight its importance, the section has separated out from the previous section to become its own section (Stage 4 in the process). This continues to advocate that the process should **inform local plan or neighbourhood plan policies**.

### Question 13: Do you have any comments about the three appendices?

Nine responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- The advice on the **LHCT** offers succinct guidance and is easy to follow.
- **Figure A1.1** shows a mansion instead of a three-storey terrace.
- It would be useful to move **Appendix 3** into the body of the guidance.
- It would be useful to provide an explanation of the **similarities and differences** between how character is classified in different guidance documents.

### GLA response

The GLA welcomes support for the inclusion of the **LHCT**. **Figure A.1.1** has been revised to show a three-storey terrace. As it would cause disruption to the flow of the guidance and make the body of the document too large, **Appendix 3** has not been moved into the body of the guidance. It should also not impact the implementation of the process. The addition of supplementary text on the **similarities and differences** between how character is classified in different guidance documents was considered. However, on balance, it was decided that this would not be added as it may confuse the reader.

### Question 14: Is there anything else you want to tell us about the characterisation and growth strategy LPG?

Ten responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Supportive that '**module A**' has been split into two documents.
- Supportive of the principles set out in the document.
- Concern that LPAs may not have enough **resources** and skills to undertake the process set out in the guidance.
- Guidance should be clear that **tall buildings** are not suitable in conserve areas.

## GLA response

The GLA welcomes the broad support for this guidance and the splitting of ‘**module A**’. Nevertheless, it is acknowledged that this guidance contains a number of **resource**-intensive design processes. That withstanding, the process of frontloading the design work has many benefits, including more meaningful engagement with local communities at the beginning of the plan-making process and more clarity and certainty on development within London. Greater focus on the design and characterisation process at the local plan-making stage may also streamline the assessment of planning applications that are subsequently lodged. It should also be acknowledged that boroughs already undertake character assessments as part of their statutory responsibilities; therefore, the guidance in this LPG reflects many of the processes that are currently undertaken. The guidance does not explicitly state that **tall buildings** are not suitable in conserve areas, as there may be areas, particularly over time, for example that have **tall buildings** within them that become conserve areas.

**Question 15: Do you have any additional comments about the Equalities Impact Assessment or how this guidance will impact on people with protected characteristics (age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation)?**

Nine responses were received to this question through the online survey, with eight confirming that they had no comment. One respondent stated that it should be easier to contact the Mayor and the planning team.

## GLA response

The Mayor and GLA welcomes comments via [londonplan@london.gov.uk](mailto:londonplan@london.gov.uk).

### 3.2 Summary of Small Site Design Codes LPG consultation responses

As part of the engagement on the draft guidance, respondents were asked to submit responses to specific questions. This section also includes responses through other engagement channels.

**Question 1: Did you (or your organisation) respond to the previous consultation on Good Quality Homes for All Londoners LPG (GQHFAL) which ran between 13 October 2020 and 15 January 2021?**

Eleven responses were received to this question through the online survey. Four respondents stated 'yes' while seven responded 'no' or 'don't know'.

Response	Number	Percentage
Yes	4	36%
No	5	45%
Don't know	2	19%
<b>Total</b>	<b>11</b>	

**Question 2: Does this guidance address your previous response?**

Nine responses were received to this question through the online survey. Two respondents stated 'yes' while four responded 'no' or 'partly'.

Response	Number	Percentage
Yes	2	22%
No	2	22%
Don't know	3	34%
Partly	1	11%
Other	1	11%
<b>Total</b>	<b>9</b>	

**Question 3: If not, please advise which specific matters have not been addressed in this LPG:**

Five responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Concern that LPAs may not have enough **resources** and skills to undertake the process set out in the guidance [this was also raised in the first consultation].
- The guidance should be less **prescriptive**.

**GLA response**

It is acknowledged that the development of area-wide design codes is a **resource-intensive** exercise. However, it is considered that this upfront design work will provide a framework for a more streamlined assessment at the development management stage. As a result, once embedded, area-wide design codes are considered to be a useful tool to help bring forward, and assess, small sites. This work also ties into the National Model Design Code, which is advocated at a national level. The guidance provides a framework or process for local authorities to create area wide design codes. Many of the aspects detailed within are advisory. As a result, it is not considered that it is too **prescriptive**, but rather that it provides a broad process for local authorities to follow.

**Question 4: Do you have any comments about the information on page 1 and section 1 setting out how the guidance applies?**

Seven responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Information is clear and concise.
- The focus of the document is solely on design and does not address the complexity of **land ownership, site assembly, viability**, and market demand for small sites.
- **'Local Plan making'** should be expanded to cover 'Local and neighbourhood plan making' as this document covers both types of plan.
- Whilst the guidance may capture more typical small site conditions, questions are raised about how **atypical** sites are to be assessed?
- The input of **specialists**, particularly those in heritage and conservation should be reiterated.

**GLA response**

The guidance on small site design codes is aimed at the redevelopment and delivery of sites with similar characteristics to each other throughout London. Examples include terrace infill and upward extension for instance. As a result, area-wide design codes should be applied to 'character types' and this guidance provides a process for LPAs to follow. While aspects of **land ownership, site assembly and viability** should be considered when developing an area-wide design code, this guidance is

focused on the design process for these common occurring sites. As a result, **atypical** sites are less likely to benefit from an area-wide design code. The guidance now advocates that **specialists**, such as heritage and conservation officers, should be involved in the process. Lastly, the '**Local Plan Making**' title has also been amended to 'Plan Making'.

#### Question 5: Do you have any comments about engaging communities and neighbourhood planning as set out in section 1.2.2 and 3.2?

Eight responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Questions raised as to whether the community should be **engaged** at Stages 1 and 3 as well.
- Requirement in **paragraph 1.2.2** for boroughs to collaborate effectively with any statutory neighbourhood planning bodies is strongly supported.
- The guidance would benefit from making clear that where **neighbourhood planning** groups have already prepared design codes that are in a neighbourhood plan, then LPAs, in preparing their local plans, should avoid preparing their own design codes for these areas unless there are clear and compelling reasons to do so.

#### GLA response

Involvement of local communities in the development of small sites is an important aspect. As a result, the guidance is clearer on when the local community should be **engaged** with; and this has been extended to Stages 1 and 3. Guidance on this process within **neighbourhood planning** has been included in **paragraph 1.2.2**.

#### Question 6: Do you have any comments about identifying design code coverage as set out in section 2.1 and the design vision and principles as set out in section 3.1 noting that these build on the guidance in the Characterisation and growth strategy LPG?

Eight responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Design code coverage section is clear and supported.
- Other small site **conditions** such as railway arches and canal/river locations could be identified.
- Specific text about heritage assets and **conservation areas** being a strength should be introduced in this document.
- The reference to **area types** should be removed.

#### GLA response

Due to confusion between the terms used in the National Model Design Code and this LPG, the term '**area type**' has been removed from the guidance. Originally, reference to this term was intended to help practitioners navigate the different terms,

however this term has now been removed as it has confused many readers. Guidance on how to develop design codes in **conservation areas** has now been added. While **conditions** such as river locations are not included, boroughs may wish to explore this.

### Question 7: Do you have any comments about different site conditions set out in section 2.2.-2.6?

Eight responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Guidance shouldn't encourage development on **back gardens**.
- Welcome the focus on small site **conditions**.
- This **approach** would be particularly beneficial for SMEs.

#### GLA response

In response to comments, several terms have been removed or amended. This includes the term 'underutilised' and 'back garden' which have been removed. As a result, the LPG does not directly reference or advocate setting design codes for **back gardens**. The word '**conditions**' has also been changed to 'contexts'. The GLA welcomes the support for its **approach**.

### Question 8: Do you have any comments about identifying and mapping small sites as set out in section 2.7 and scoping what areas the design code will cover as set out in section 2.8?

Seven responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Potential to add additional guidance on the **call for sites process**, including how community-led housing fits into the process.
- Welcome the explicit mention that the same character type need not elicit a consistent design response.
- Other forms of housing, such as **Gypsy and Traveller accommodation**, should be considered before identifying a site for residential development.
- Concern about the impact of design codes on **conservation areas**.

#### GLA response

The **call-for-sites process** can be a helpful exercise to understand which sites may come forward for development in the near future. As a result, the guidance has been amended to highlight the **call-for-sites process** when identifying small sites in a local area. The document has also been revised to highlight the potential role of community-led housing in the redevelopment of small sites. The LPG now states that identifying small sites for residential development should also consider the wider needs within the plan area, such as **Gypsy and Traveller accommodation** and other specialist forms of housing. Additional guidance has also been added to the

coding coverage section to clarify how to approach small sites in sensitive areas such as those in **conservation areas**.

### Question 9: Do you have any comments about preparing a coding plan as set out in section 3.3?

Seven responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- The **option to exclude areas** from the coding plan, where there is a mixed character that would be difficult to code for, is welcome.
- Areas of exceptionally **mixed typologies** or those on the boundaries of other building types should not be excluded from the design code, as these areas would benefit from the guidance.

#### GLA response

The GLA welcomes the broad support for this guidance and clarification of the **option to exclude areas**. The guidance does not exclude areas of **mixed typologies**, but states that these areas ‘may be excluded where a design code is difficult to achieve’. This is because the ‘character types’ are identified at a ‘several urban blocks’ scale.

### Question 10: Do you have any comments about Stage 3, preparing the design code as set out in section 4?

Nine responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Use of terms ‘must’, ‘should’ and ‘could’ to **clarify the level of compliance**, backed with specific examples, is useful.
- Guidance should make clear that where a site is in a **conservation area**, this will be a key consideration for the design code.
- Sustainable materials should be included/advocated for in the materials section. The image in the green coverage section should be amended so it does not support a **tree being removed**.
- **Swift bricks** should be advocated for.

#### GLA response

Support for the use of terms to **clarify the level of compliance** is welcome. Additional guidance has been added to the document on how to approach character types that are likely to be within **conservation areas**. While the use of **swift bricks** can be advantageous, as this document provides a process to develop area-wide design codes, it is not considered necessary or appropriate to specifically mention swift bricks. The example in the ‘Green cover and landscaping’ section has been amended so that it does not advocate for a **tree to be removed**.

### Question 11: Do you have any comments about Stage 4, implementing and reviewing the design code as set out in section 5?

Seven responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Support for the requirement to monitor design codes.
- The **Stage number** could be aligned to the document section number for easier reference.
- Concern a small site design code could be lengthy and not **concise**.
- LPAs should have a responsibility to monitor the **compliance** with any codes prepared by neighbourhood planning groups.

#### GLA response

Due to the structure of the LPGs, which is the same across all LPGs, it is not possible to align the '**stage**' number with the 'section' number. As a result, no change has been made. In section one of the LPG, a design code is defined as a 'set of simple, **concise**, illustrated design requirements that are visual and numerical wherever possible to provide specific, detailed parameters for the physical development of a site or area'. Section 5.2.1 of the LPG has been amended to clarify that LPAs are encouraged to monitor the **compliance** of their codes, including those set up a neighbourhood planning group.

### Question 12: Do you have any comments about the appendices?

Six responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- The inclusion of Appendix 2 is helpful.
- Concern that **inappropriate** upward extensions may negatively **impact** the streetscape and uniformity of terraced/semi-detached housing types.
- Extensions to buildings (especially upwards extensions) need to avoid '**watermarks**' when transitioning from an old to a new (matching) material.

#### GLA response

The case studies and images in the LPG have been carefully selected in order to show best practice. To avoid unintended/**inappropriate impacts** on the streetscape, the example upward extension design code has been amended to recommend that development should be brought forward on a minimum of two neighbouring terraces next to each other to avoid a saw-tooth effect of the street. Avoiding **watermarks** has also been mentioned.

### Question 13: Is there anything else you want to tell us about the Small Site Design Codes LPG?

Seven responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- The document provides a helpful account of the features of development that a design code could take into consideration.
- Additional guidance should be provided as to how to plan for **unique** sites.
- **Figure 2.13** shows brownfield sites in Newham, which bear no relation to the types of sites covered by the guidance in section 3.3 (which is more about consistent/repeated sites).
- Use of the term 'location' rather than '**condition**' is preferred. Suggest that the terms 'street-facing locations', 'high street locations', and 'back land locations' should be used throughout the document instead.
- The guidance should include some more detailed contextual information on how small sites design codes will sit alongside **existing planning policies** and requirements – this could be included as a preamble paragraph to chapter 2.
- Concern over the level of upskilling, **resourcing** and increased capacity that will be required to identify and map appropriate small sites, carry out consultations and code testing, produce design code content and carry out monitoring tasks.
- **Targeted consultation** with members of the public most directly affected by the code for a particular area would be most beneficial, rather than borough-wide consultations. As such, we would suggest that sub-areas should be identified during the area characterisation studies that can be utilised to hold consultations at smaller scales.

## GLA response

The guidance is clear that small site design codes can be useful in clarifying the design parameters for commonly found sites around London. However, for sites that are **unique**, a site-specific design code may be more appropriate. The images throughout the document have been reviewed and where necessary, these have been updated to ensure that they are of the highest quality and appropriate. This includes **Figure 2.13** which now references the GLA's Small Site Small Builders portal instead. It is acknowledged that the development of area-wide design codes is a **resource**-intensive exercise. However, it is considered that this upfront design work will provide a framework for a more streamlined assessment at the development management stage. As a result, once embedded, area-wide design codes are considered to be a useful tool to help bring forward, and assess, small sites. Further information on how small sites design codes sit alongside **existing planning policies** and requirements has been added and the term '**condition**' has been changed to 'context'. Additional text has also been added to the LPG to clarify that '**targeted consultation** with members of the public most directly affected by the code for a particular area is encouraged.'

**Question 14: Do you have any additional comments about the Equalities Impact Assessment or how this guidance will impact on people with protected characteristics (age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation)?**

Six responses were received to this question through the online survey, which all reported having no additional comments.

### 3.3 Summary of Optimising Site Capacity: A Design-led Approach LPG consultation responses

As part of the engagement on the draft guidance, respondents were asked to submit responses to specific questions. This section also includes responses through other engagement channels.

**Question 1: Did you (or your organisation) respond to the previous consultation on Good Quality Homes for All Londoners LPG (GQHFAL) which ran between 13 October 2020 and 15 January 2021?**

Twelve responses were received to this question through the online survey. Four respondents stated 'yes' while eight responded 'no'.

Response	Number	Percentage
Yes	4	33%
No	8	67%
Don't know	0	0%
<b>Total</b>	<b>12</b>	

**Question 2: Does this guidance address your previous response?**

Ten responses were received to this question through the online survey. One respondent stated 'yes' while three responded 'no' or 'partly'.

Response	Number	Percentage
Yes	1	10%
No	2	20%
Don't know	3	30%
Partly	1	10%
Other	3	30%
<b>Total</b>	<b>10</b>	

**Question 3: If not, please advise which specific matters have not been addressed in this LPG:**

Four responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Concern that LPAs may not have enough **resources** and skills to undertake the process set out in the guidance.
- The document should make it clear that the process should be brought forward through an appropriate **Development Plan Document (DPD)**.
- Additional residential building types would be useful and are still needed.
- Four dwellings per core in the **Tower** building type is an inefficient use of resources [this was also raised in the first consultation].

**GLA response**

The GLA acknowledges that carrying out this process will require **resources**. However, there is an expectation that setting parameters will support and streamline the assessment of applications at the planning applications stage. Wording in the document has been revised to make it clearer that this process should be brought forward through an appropriate **DPD**. Lastly, as the parameters are high-level and strategic, the residential building types (such as the '**Tower**') are simplified typologies that meet the Housing Design Standards. In particular, there is an expectation that all homes should be dual-aspect. For this reason, the **Tower** typology has been designed to accommodate 100 per cent dual-aspect, and has four dwellings per core. This is nevertheless a high-level assumption and typology should only be used to work out an indicative (or appropriate) capacity (see GLA response to Q9).

**Question 4: Do you have any comments about the information on page 5 and section 1.1, 1.3, 6.2 and 6.3 setting out how the guidance applies?**

Eleven responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Principles of plan-led approach supported.
- Support the replacement of the density matrix with a context-led approach.
- Welcome the requirement that planning applications should follow this process.
- The involvement of heritage **specialists** should be clarified.
- Document should make clear if other local plan documents (such as Design Supplementary Planning Documents) are subject to the same process and consultation?
- Concern about a **prescriptive** and/or rigid rules-based approach to development.

## GLA response

Design parameters for specific sites are expected to be set out in DPDs through involvement with **specialists** in urban design, including heritage and conservation officers. The process set out in this LPG should be brought forward through an appropriate **DPD**. As a result, additional text has been added to this section to clarify these points. The guidance also reiterates that the design parameters should be a set of high-level strategic parameters that address the form, massing and layout of a future development. As a result, they should avoid being overly **prescriptive** while setting parameters on the strategic matters. This aims to provide clarity and certainty over future development and can assist in increasing trust in the planning system when referring to design aspects.

### Question 5: Do you have any comments about engaging communities and neighbourhood planning as set out in section 1.2, 3.2 and 6.2?

Twelve responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Welcome the clarity on the expectation to consult the community.
- The LPG should include reference to engagement with **landowners and developers**.
- Concern that only parts of the community will be engaged with; and that the guidance should reiterate the importance of meaningful **community engagement** with hard-to-reach communities.
- Concern about a lack of **community engagement**.
- Concern about the **community engagement** frustrating the delivery of homes.
- Concern that community engagement may be time and **resource**-intensive.
- It would be useful to set out how **community engagement** and the consultation on the design-led site allocation approach coincides with the statutory consultation framework for local plans.

## GLA response

To reflect the importance of **community engagement**, additional text has been added to the LPG. Engagement with **landowners and developers** is also now referenced. While engagement with communities may result in additional **resource** being directed towards this area, the GLA feels that this is an important part of the process in order to deliver well-designed places that serve new and existing residents alike.

### Question 6: Do you have any comments about the site analysis as set out in section 2.1-2.8?

Ten responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- The LPG is focused on residential design, and less so on other **land uses**.

- This section does not address the complexity of land ownership, site assembly, **viability**, market demand and supply cycles, and mixed-use development – these are all determinants to design.
- Specify that **above-ground utilities** should be considered as well as those below ground.
- Date that is noted in **section 2.8.3** (footnote) should be amended as it is incorrect.

### GLA response

While the guidance is predominantly focused on the development of residential sites, the process should also be applied to other **land uses**. The guidance acknowledges the influence of **viability**, which has been mentioned in section 2.8 and Appendix 1. The wording in **paragraph 2.8.3** recognises the importance of viability and market demand. The importance of assessing **above-ground utilities** has been highlighted and footnote 2.8.3 has also been amended.

### Question 7: Do you have any comments about Stage 2 which sets out the process for developing a design vision as set out in section 3.1-3.3, noting that this builds on the guidance in the Characterisation and growth strategy LPG?

Ten responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Reference to mid-rise typologies achieving high densities with relevant precedence is welcomed.
- It would be useful to have a better understanding of how the design vision stage differs from the **design parameters** stage.
- Section should clarify that applicants of sites should use and present their **site-analysis** work done at Stage 1, during their public consultation. Guidance should clearly state that applicants are expected to amend or add additional information gathered during engagement so that it informs site vision.
- Guidance in **section 3.3** should further emphasise that site parameters should be derived from not only the borough-wide characterisation study and site level analysis but of the area-wide or neighbourhood parameters and policies.

### GLA response

The design visioning stage is an important stage in the process that involves the consideration and reflection of the **site analysis**. As such, it was felt that it was necessary to have a separate stage which reiterates the ‘thinking’ or ‘visioning’ part of the process and how this is separate from defining and clarifying the **design parameters**. The guidance also states that practitioners should present the findings of their site analysis to the local community and other stakeholders. This aims to improve the quality of local engagement. The wording in **section 3.3** has also been revised to reflect the existing area-wide or neighbourhood parameters and policies.

### Question 8: Do you have any comments about the Stage 3, drafting site-based design parameters, as set out in section 4.1-4.7?

Ten responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Defining site-based design parameters is welcomed.
- The setting of some of the parameters is overly **prescriptive** and will stymie high-quality design.
- Welcomes clarification that the parameters should allow for a degree of **flexibility**.
- Concern that drafting the site-based design parameters is a **resource-intensive** process.
- Concern that LPAs do not have the **in-house skills** to carry out the process.
- The guidance could provide further detail on the draft site-based **design parameters**.

#### GLA response

The GLA acknowledges the importance of having a balance between **flexibility** and **prescription** within the design parameters, at the same time as providing enough clarity and certainty. As a result, the guidance sets out that the design parameters should be a set of high-level strategic parameters that address the form, massing and layout of a future development. The guidance acknowledges that the level of detail provided in the **design parameters** for each site will vary depending on its size, location and characteristics. Accordingly, the balance struck in the LPG is considered to be appropriate. While the GLA also acknowledges that this will require **resources**, there is an expectation that setting parameters will support and streamline the assessment of applications at the planning applications stage. The GLA acknowledges that some LPAs do not feel they have the **in-house skills**. However, this process provides an opportunity to develop and bolster these in-house skills (via routes such as Public Practice for instance), which will lead to improvements over time.

### Question 9: Do you have any comments about Stage 4, testing the site capacity, as set out in section 5?

Ten responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Welcome the statement about indicative capacities being **approximate**.
- Suggestion that the **capacity** should be given as a figure or a range.
- Document should specify what **weight should be afforded** to the indicative capacity calculations in the decision-making process or at appeal.
- Concern there is an absence of testing of this **methodology**.
- It may be difficult to use the residential building types on **irregular-shaped sites** [this was also raised in the first consultation].
- It would be useful to have other building typologies or **street types**.

## GLA response

The capacity toolkit and its **methodology** have been robustly tested during the development of this guidance. The indicative site capacities set should not be interpreted as absolute maximums or minimums for the quantum of homes. The design parameters provide a design envelope which provides clarity and certainty in respect of the overall form of the development. However, the exact **capacity** will depend on the detailed design within the set parameters. As a result, additional text has been added to this section to make it clearer that indicative site capacities should be treated as an **approximation**, but this does not apply to the design parameters set. The **weight afforded** to a site's indicative capacity calculations will be dependent on whether it is set out in a DPD or not. The GLA acknowledges that the residential building types are more difficult to use on **irregular-shaped sites**. However, the benefits of using a simple to use design package, such as SketchUp, are considered to outweigh the drawbacks. The guidance is also clear that boroughs can use other tools if preferred. Additional **street types** have been added to the library of types.

### Question 10: Do you have any comments about Stage 5 for finalising the design parameters and design codes as set out in section 6?

Ten responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Explanation about the **parking factor and ratio** would be useful.
- Engagement with **landowners and developers** should be carried out during this process.
- Support for high-level, strategic parameters that are not overly detailed or prescriptive, as this will restrict creativity and innovation.
- Consistent use of same example site is helpful, in particular seeing how this translates to a design code/parameters diagram.

## GLA response

The GLA welcomes the support of the example site and high-level strategic design parameters outlined in the guidance. Additional text has been added to clarify the **parking factor and ratio** within the capacity calculator. Engagement with **landowners and developers** is included within this guidance.

### Question 11: Do you have any comments about the Appendices?

Eleven responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- **Towers** often have more than four units per core.
- There should be additional residential types that are applicable to **suburban** sites.

- More **typologies** would be useful. Suggestions include typologies for irregular sites, mansion block or double-loaded corridor blocks.
- The comment, “As accommodation is stacked over a number of storeys, it can be less suitable for many disabled and older people” should feature as a **weakness**, not a **strength**.
- Use of precedents is helpful.
- It is unclear how the toolkit accommodates for different building **typologies** beyond the assigned categories.

### GLA response

The residential building types within the Indicative Site Capacity Toolkit aim to provide a selection of the most common housing **typologies** in London that can be modelled in SketchUp. This includes the terrace typology, which can be used in **suburban** areas. Nevertheless, these have been amended to provide the ability to create perimeter blocks and street types. Due to uncertainty about changes to building fire safety regulations, the SketchUp model of the **tower** typology has subsequently been removed from the guidance. Following further clarity on the fire safety regulations, this tower SketchUp model may be revised and included within the indicative site capacity toolkit. The **strengths and weaknesses** table has also been revised to better reflect the attributes of the different residential types.

### Question 12: Is there anything else you want to tell us about the Optimising Site Capacity – A Design-led Approach LPG?

Nine responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Concern that **frontloading** the design work could impact the finances of planning departments.
- Public engagement and consultation would require considerable **resources** in order to reach a wide range of people within the borough.
- The use of SketchUp is limiting. The guidance should provide examples of alternative software (for example VuCity or other **brands**).
- It is not clear when the consultation should occur for this process and whether this should be part of **regulation 18**.
- Can it be made a requirement for planning applicants to include details of how they followed this approach as part of their **planning application** documents?

### GLA response

The GLA acknowledges that **resources** will be needed for community engagement work and **frontloading** design considerations. However, this should already form part of a local authority duties and responsibilities. Pre-application meetings are a useful way to clarify many of the site-specific requirements and many of the non-strategic requirements. Community engagement on sites should occur before **regulation 18**, as this will allow sufficient time to encompass aspects learned and developed during the process. The use of specific **brands** or software has not been

included in the guidance as this may undermine other competitors and suppliers. Lastly, the guidance does include details on the **planning application** stage.

**Question 13: Do you have any additional comments about the Equalities Impact Assessment or how this guidance will impact on people with protected characteristics (age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation)?**

Eight responses were received to this question through the online survey, which all reported having no additional comments.

### 3.4 Summary of Housing Design Standards LPG consultation responses

As part of the engagement on the draft guidance, respondents were asked to submit responses to specific questions. This section also includes responses through other engagement channels.

#### Question 1: Did you (or your organisation) respond to the previous consultation on Good Quality Homes for All Londoners LPG (GQHFAL) which ran between 13 October 2020 and 15 January 2021?

Fifteen responses were received to this question through the online survey. Four respondents stated 'yes' while eight responded 'no'.

Response	Number	Percentage
Yes	7	47%
No	7	47%
Don't know	1	6%
<b>Total</b>	<b>15</b>	

#### Question 2: Does this guidance address your previous response?

Fourteen responses were received to this question through the online survey. One respondent stated 'yes' while eight responded 'no' or 'partly'.

Response	Number	Percentage
Yes	1	7%
No	3	21%
Don't know	3	21%
Partly	5	37%
Other	2	14%
<b>Total</b>	<b>14</b>	

### Question 3: If not, please advise which specific matters have not been addressed in this LPG:

Nine responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Current limit of **eight units per core** should be increased [this was also raised in the first consultation].
- Communal corridors wider than **1500 mm** may be impractical.
- Concern that the guidance does not address **daylight and sunlight** adequately.
- There are a **large number of standards**.
- The document does not include a direct reference to **swift bricks** or similar to reflect London Plan Policy G6.

#### GLA response

The number of homes per core is an important design aspect, which can influence the sense of community and neighbourliness within a development. As such, having a limit of **eight dwellings per core** is considered an important design standard. Nevertheless, this standard does allow for exceptions and provides a list of mitigation measures such as increasing the corridor widths to **1800mm**, locating homes on both sides of the core and introducing intermediate doors to create sub-clusters. For developments that have eight dwellings or fewer per core, the standards do not require communal corridors to be wider than **1500mm**. The guidance addresses daylight and sunlight in a large number of standards: A1.7, A1.8, B9.5, C2.4, C4.1, C4.3, C4.8, and it also highlights that the BRE guidance on **daylight and sunlight** should also be used to assess developments. The **large number of standards** reflects the requirements of the London Plan and the importance of good housing design. An additional note has been included about the potential for **swift bricks**.

### Question 4: Do you have any comments about the information on page 5 and section 1 setting out how the guidance applies?

Eleven responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Explicit reference of the impact of the COVID-19 pandemic on housing standards is welcomed.
- LPG says it **applies** to 'Change of Use' but some of these would fall under the General Permitted Development Order. It is not clear if this guidance would apply in that scenario.
- The LPG should be clearer on how the standards are to be **implemented** by architects/developers, and assessed by planners.
- The LPG does not provide adequate guidance on how to treat an application that is unable to meet some or **all the standards** in this document.
- Concern that the guidance reproduces the content of the London Plan.

- There is a lack of guidance on **build-to-rent** development.
- The Housing Design Standards should be **applied flexibly**.

### GLA response

The housing design standards LPG aims to be a 'one stop shop' for housing design matters. As a result, the LPG includes guidance on design aspects in a list format to assist the designer in **implementing** them. The standards are ordered to align with the design process which cover, and link back, to requirements in the London Plan. The expectation is for all development (taking account of the type of development like change of use, new build, conversions) to meet **all the standards**. The document also has a list of best practice standards; it has been made clearer that while it is not required, it is encouraged, that these are met. The LPG applies to planning applications; therefore, if a development does not require planning permission, then these standards will **not apply**. The guidance applies to **build-to-rent** development and standards should not **applied flexibly**.

### Question 5: Do you have any comments on the Placemaking and the Public Realm guidance/text as set out in paragraph 2.1.1-2.1.8?

Nine responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Guidance could be more explicit about the importance of holistic character analysis (including heritage analysis) and response to **character and context**.
- This section should signpost the **GLA's public realm guidance**.
- The importance of **blue infrastructure**, and not just green infrastructure, should be highlighted.
- Suggestion that third sentence of **paragraph 2.1.7** is amended to read: "It is important that streets and public realm are overlooked and well-used."
- Suggestion that 2.1.8 adopts a social model approach and specifically mentions **inclusive** spaces.

### GLA response

The guidance is clear that understanding the surrounding **context and character** is important to good design; this is reiterated, in particular, by the standards A1.1, A1.3, A1.4, A1.5 and A1.6. The guidance has been amended to reference the GLA's **Public London Charter**; and both **blue infrastructure** and inclusive design to good design are further reiterated. **Paragraph 2.1.7** has also been amended. Additional wording and guidance on **inclusive** design has been added into the guidance.

### Question 6: Do you have any comments about the standards in Part A?

Thirteen responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Standard A5.4 (**accessibility of non-residential amenities**) may not be feasible in many circumstances due to requests by RP's relating to the service charge affordability challenges and estate management issues.
- **Standard A1.14** appears to conflict with the document's ambition for high-quality design of buildings.
- **Standard A1.14** – concern that it could lead to a reduction in the proportion of dual-aspect or enhanced single-aspect dwellings.
- Standards should be applied flexibly.
- **Standard A4.2** should advocate for artificial nest sites such as swift bricks.
- **Standards A4.2** and A4.3 should state whether it applies to all development or just some.

### GLA response

A number of amendments have been made to the supporting text in part A and the standards. These include amendments to **Standard A1.14**, to ensure it does not contradict or conflict with other standards. A note has also been added to **Standard A4.2** to mention artificial nest sites such as swift bricks as an option. The **accessibility of non-residential amenities** to residents of all tenures is an important design consideration. As a result, the standard has not been removed.

### Question 7: Do you have any comments on the Shared Spaces and Ancillary Spaces guidance/text as set out in paragraph 3.1.1-3.1.6?

Eight responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Greater emphasis should be placed on accessibility such as **step-free access**.
- Providing refuse in the **basement** is expensive and carries a higher service charge, as refuse removal has to be managed.
- **Garden sheds** or pods are not normally provided to, or permitted on, private terraces flanking shared podium amenity spaces.

### GLA response

The standards and supporting text have been amended to highlight the importance of **step-free access**. Standard B1.9 has also been amended to clarify that the standard should apply 'where **basements** are provided'; and the wording around **garden sheds** and pods have been revised.

### Question 8: Do you have any comments about the standards in Part B?

Twelve responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- **Standard B1.9** – it is very expensive to provide basements in London and this is unlikely to be a practical suggestion.

- **Standard B2.2** – prohibiting double-banked corridors will have a significant impact on housing numbers achievable.
- **Standard B2.3** – concern about covered outside decks, and questions around their effectiveness and desirability.
- **Standard B2.3** – access galleries/decks sometimes bring privacy challenges, both for adjoining and future occupiers. These can also cause cold-bridging problems and are harder to maintain (e.g. pigeons, etc).
- **Standard B2.5** – number of units per floor should be increased from eight.

### GLA response

A number of amendments have been made to the supporting text in part B and the standards. These include amendments to **Standard B2.2**, which no longer prohibits internal corridors, as the GLA acknowledges that they can be used to good effect in some developments (particularly tall buildings) in London. **Standard B1.9** has been amended to clarify that the standard should apply 'where basements are provided'. **Standard B2.3** has also been amended to become a best practice; it is therefore no longer a mandatory standard. Nevertheless, deck access is still encouraged as it can provide social spaces for residents, as well as the ability to provide a greater proportion of dual-aspect homes. A new standard (Standard B10.2) has also been added to address the submission of energy performance data. The number of units per floor in **Standard B2.5** has not been revised, as this is considered optimal for facilitating interactions between neighbours.

### Question 9: Do you have any comments on Homes and Private Space guidance/text as set out in paragraph 4.1.1 and 4.1.2?

Eleven responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Concern about **minimum space standards** frustrating the delivery of homes.
- Concern about the **5 per cent** extra space that is advocated for, as this will impact on development costs.
- Welcome the emphasis on climate mitigation and importance in design.

### GLA response

The **minimum space standards** are a London Plan policy requirement, and are also set in the nationally described space standards. As a result, no amendment has been made. The additional space in Standard C2.1 is a best practice standard and therefore strongly encouraged, rather than being required. Nevertheless, to clarify the exact space that is needed in different dwelling sizes, the standard has been revised to include a set of best practice space standards. As a result, the **5 per cent** uplift has been removed.

### Question 10: Do you have any comments about the standards in Part C?

Eleven responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Guidance should address topography in greater detail.
- **Standard C2.2** – evidence should be provided to demonstrate that larger dwellings provide a qualitative improvement to residential quality.
- **Standard C4.1** – the standard is more restrictive than the wording in the London Plan Policy D6.
- Standard C4.6 – this standard has the potential to limit daylight to units and may result in rooms failing the **BRE standards**.
- Number of **best practice** examples should be removed as they go further than the London Plan.
- Standard C2.6 – this standard goes beyond the **validation requirements** of most London boroughs.
- Standard C4.3 – it would be useful to have the **two-stage approach**, set out in paragraph 4.1.2, as a required standard.

### GLA response

A number of amendments have been made to the supporting text in part C and the standards. These include amendments to some of the standards that address design considerations of accessibility issues. **Standard C2.2** has also been amended to remove the 5 per cent uplift on floor area and replace it with a revised space standards table in Appendix 1 of the document. The expectation to provide larger homes, in the form of a best practice space standard, is an important design consideration now that many more Londoners are working from home. This decision to amend the standard was made because the 5 per cent additional would have been difficult to calculate, and unclear when dealing with decimal floor areas (for instance, whether to round up or down). As a result, the GLA feels it is clearer to state the additional space in a table. These new space standards have been robustly tested to ensure that they are able to provide an uplift in residential quality and three example layouts have been included in the appendices of the document. The guidance is clear that **best practice** standards are strongly encouraged, rather than being mandatory. No changes have been made to the minimum space standards as these are contained within Policy D6 of the London Plan. **Standard C4.1** has also not been revised as it is not considered to be more restrictive than Policy D6. Overall, these standards link to policies in the London Plan and therefore do go beyond the **validation requirements**. The **two-stage approach** to assessing daylight and sunlight is included in the introductory text to Part C: Homes and private outside space. As there are no standards that explicitly mention the **BRE guidance**, it would be confusing and misleading to include the two-stage process as a standard.

### Question 11: Do you have any comments about the appendices?

Ten responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Welcome the inclusion of Appendix 2.
- Further explanation and illustration of **dual-aspect definition** would be useful.
- Dual-aspect definition should include reference to **enhanced single-aspect**.

- The level of detail specified in Appendix 1 Furniture Schedule could discourage creative layouts that cater to a variety of functions.
- The **kitchen layouts** are overly prescriptive.
- For kitchen furniture, there will be differing requirements for **M4(3) homes**. This includes space alongside tall appliances and cooking facilities.

### GLA response

The **dual-aspect definition** has been amended and a set of illustrations has been inserted to clarify this definition pictorially. The term '**enhanced single-aspect**' has not been used, as it may encourage developments towards this. Appendix 1 is a useful tool for designers and has been kept in the document. This includes **kitchen layouts** as well as referencing the Approved Document M where guidance on **M4(3) homes** can be found.

### Question 12: Is there anything else you want to tell us about the Housing Design Standards LPG?

Ten responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Broad support for the LPG and standards contained within it.
- Some **illustrations** would be useful in the document.
- The standards should be applied **flexibly** [this was also raised in the first consultation].
- The standards should be **strengthened**.
- Concern there is a lot of **repetition** of existing guidance.

### GLA response

The GLA recognises the usefulness of **illustrations** and images in a housing design document. As a result, the LPG now contains a number of **illustrations** after each section of the document. These **illustrations** aim to link back to particular standard/s, providing additional clarity on them. Where possible, the LPG has tried to minimise duplication and **repetition** of guidance that can be found in the London Plan or in other guidance. However, there is a degree of duplication to some of the guidance and policies in the London Plan as to omit these aspects may lessen or undermine their importance and significance in housing design (for instance, removing standards may lead the reader to view those aspects as less important). The standards set out in the guidance have been worded carefully so there is a balance between flexibility and prescription. This is considered to be appropriate as further **flexibility** or **strengthening** of the standards may undermine them, and lead to them becoming unenforceable or impossible to achieve.

**Question 13: Do you have any additional comments about the Equalities Impact Assessment or how this guidance will impact on people with protected characteristics (age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; sexual orientation)?**

Eight responses were received to this question through the online survey. A summary of all responses relating to this question is detailed below:

- Welcome the provision of a separate **study** area within the home, as this is particularly beneficial to demographics more likely to work at home. This includes women; under-21s and over-65s; and those with a disability.
- The inclusion of **inclusive and accessible** wording throughout the document, even if repetitive, is helpful.
- Whilst accessibility is mentioned, the LPGs could include greater clarity and guidance on issues of **inclusion and accessibility**.
- **Walking, cycling** and public transport must be prioritised over other vehicles to prevent exacerbating inequality.

**GLA response**

The GLA welcomes the broad support for the provision of additional home-working space within new homes. As a result, the Best Practice Space Standard in the Housing Design Standards LPG has been amended to require additional desk spaces within new homes. The guidance also advocates, via a best practice standard, that homes should have a dedicated **study**. Nevertheless, while this LPG aims to increase the size of new dwellings, it is ultimately up to the user in how they eventually use this space. For instance, some households may wish to use the additional space differently to suit their living requirements. To ensure that new homes are **inclusive and accessible**, the wording of several standards has been revised. This includes standards A3.2, B1.9, B9.1, C1.1, C10.1, and C10.5. Prioritising **walking, cycling** and public transport over other vehicle use is an important and reiterated element within these LPGs. In particular, the LPGs advocate for the Healthy Streets approach and the concept of the **15-minute city**.

## **4 Next steps and monitoring**

Following the consultation and analysis of responses, the four documents in the Design and Characterisation suite have been updated to reflect the points raised as part of this process. Updated documents will then be approved by the Mayor. It is expected that the documents will be adopted in early 2023.

Following the adoption of the London Plan in 2021, a consultation was undertaken on a new framework for the Annual Monitoring Report (AMR). The consultation has concluded, and the new AMR framework has now been published. A new AMR covering 2021-22 is due to be published in March 2023. Monitoring of this guidance will fall under the monitoring of the London Plan policies D1, D3 and D6, under which these LPGs sit.

## Appendix 1 Summary of engagement

### A1.1 Informal and/or early engagement (prior to first consultation)

Activity type	Participation	Representation
Workshop	Young Londoners working with the Stephen Lawrence Trust (Blueprint for All)	23 attendees
Workshop	London borough planners	45 attendees (approx.)

### A1.2 Formal engagement on Good Quality Homes for All Londoners (first consultation: 13 October 2020 – 15 January 2021)

Date	Activity type	Participation	Representation
13 October – 15 January 2021	Consultation survey and written responses	All	141 responses
5 November 2020	Webinar – guidance and focus on Module A	Borough planners	25 attendees
10 November 2020	Online meeting – overview of the guidance	Developers, registered providers, landowners, designers	9 attendees
12 November 2020	Urban Design London (UDL) webinar	Borough planners and councillors	133 attendees
20 November 2020	Webinar overview of the guidance	All	85 attendees
24 November 2020	Online meeting – focused on Module B – Small Sites and Design Codes	Borough planners	18 attendees
26 November 2020 and 1 December 2020	A SketchUp tool drop-in session was offered: individual bookable 15-minute sessions for borough planning officers with questions on how to use SketchUp	Borough planners	0 attendees

8 December 2020	Webinar – overview of guidance	All	42 attendees
-----------------	--------------------------------	-----	--------------

### A1.3 Formal engagement on Design and Characterisation LPGs (second consultation: 11 February – 27 March 2022)

Date	Activity type	Participation	Representation
11 February – 27 March 2022	Consultation survey and written responses	All	142 responses
4 March 2022	Webinar – overview of suite of documents	General public	79 attendees
8 March 2022	UDL event reviewing the Design and Characterisation guidance	General public	104 booked, 68 attendees
8 March 2022	Association of London Borough Planning Officers (ALPBO) meeting – presentation covering suite of documents	London borough officers	20 attendees
11 March 2022	Webinar – overview of suite of documents	London borough officers	83 attendees
16 March 2022	UDL event reviewing Small Site Design Codes LPG	General public	162 booked, 85 attendees
16 March 2022	UDL event reviewing Optimising Site Capacity: A Design-led Approach LPG, and the use of SketchUp models.	General public	109 booked, 59 attendees

A1.3.1 The second consultation took place in 2022 towards the easing of COVID-19 pandemic restrictions. Nevertheless, due to the uncertainty over possible new restrictions being brought in at short notice, the consultation events were all held online, through virtual meetings and webinars. The ways of responding were also publicised through the GLA’s online platforms.

A1.3.2 These events were hosted on Zoom as either meetings (participation via turning on video and unmuting, or using the chat function) or webinars (participation via the Q&A function), and included a presentation and a Q&A session. Zoom Webinar events were recorded and are available to watch on YouTube with captions (see [Bang the Table consultation](#)).

