



Sakina Sheikh AM

Chair of the Planning and Regeneration Committee

Sadiq Khan
Mayor of London
(Sent by email)

23 September 2022

Dear Sadiq

I am writing to you in my position as Chair of the London Assembly Planning & Regeneration Committee regarding the draft London Plan Guidance (LPG) on Housing Design Standards and Small Site Design Codes. The GLA is due to publish the final guidance this autumn. In advance of that, we set out our recommendations below. These recommendations are intended to help strengthen the guidance on: representing the accommodation needs of Gypsies and Travellers, safeguarding London's green spaces, access to sunlight, and increasing the diversity of voices involved in the GLA's future planning consultations, among other areas. We welcome the GLA Planning Team's engagement on this.

On 20 July 2022, the London Assembly Planning & Regeneration Committee met to discuss the Housing Design Standards LPG and Small Site Design Codes LPG, to assess whether they will meet Londoners' needs in terms of the design of homes.

In the meeting, we heard from:

- Elliot Kemp, Principal Strategic Planner, GLA
- Alan Smithies, Senior Strategic Planner, GLA
- Christopher Woodward, Director, Garden Museum
- Tara Gbolade, Mayor's Design Advocate
- Professor Matthew Carmona, Bartlett School of Planning, UCL

- David Stronge, Director of Design, Peabody
- Emma Talbot, Head of Planning, LB Lewisham
- Lev Kerimol, Community Led Housing London
- David Ogunmuyiwa, Mayor's Design Advocate
- Ilinca Diaconescu, London Gypsies & Travellers

This letter discusses the following issues, and sets out recommendations for each:

- Gypsy & Traveller accommodation and community led housing
- Preserving green space and trees in small sites, and protecting perceived 'underused' small sites
- Sunlight in public green spaces and overshadowing by tall buildings
- Diversity of GLA's outreach on planning consultations

Gypsy & Traveller accommodation and community led housing

The Planning and Regeneration Committee has a long-standing interest in the accommodation needs of Gypsies and Travellers in London, and in other forms of specialist housing such as community-led housing schemes. The Committee notes that despite the identified needs in the GLA-commissioned 2008 Gypsy and Traveller Accommodation Needs Assessment (GTANA), local authorities across London have not delivered on the recommendations of the GTANA. The Committee also notes that the requirement on local authorities in the London Plan - to plan to meet the identified need for permanent Gypsy and Traveller pitches in their areas - is not underpinned by further guidance on how they should deliver this accommodation.

The London Plan states that '*optimising site capacity does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site*'.¹ The London Plan also suggests that the small sites policy could provide '*opportunities for custom-build housing and community-led housing projects*'.²

However, these ambitions are not carried through into the guidance setting out how local authorities should identify and design code for residential small sites. The draft Small Site Design Codes LPG sets out a process for small site allocation, but does not encourage local authorities to consider the wider residential needs (such as community-led housing or Gypsy and Traveller sites) within the area.

At the July 2022 meeting, Lev Kerimol, Community Led Housing London, said that through this process of small site allocation, '*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*.' The Committee heard from Lev Kerimol and Ilinca Diaconescu, London Gypsies & Travellers, that the delivery of community-led housing projects and Gypsy and Traveller sites is '*highly dependent on council and public-owned land*'.

The Committee supports the allocation of sites for Gypsy and Traveller accommodation due to the chronic shortage of this form of accommodation across London. Research in 2019 funded by the Mayor and carried out by De Montfort University and London Gypsies & Travellers ('[The potential for a negotiated stopping approach in London](#)') found that just 10 pitches had been delivered since 2008.

¹ GLA, [London Plan 2021](#), p.112

² GLA, [London Plan 2021](#), p.182.

At the July 2022 meeting, Ilinca Diaconescu said that *'land availability for Gypsy and Traveller sites is one of the key barriers [to the provision of appropriate accommodation] and through site allocation and local plan processes we have... had only a handful of site allocations coming forward across the whole of London in the last 10 years or more'*. On 7 June 2022, the Committee conducted a visit to a Gypsy and Traveller site in Hackney to understand the challenges faced by members of the community due to lack of accommodation, and the resultant impacts on their health, wellbeing and life outcomes.

Recommendation 1

The Committee recommends that the final LPG should include text stating that local authorities should consider the area's needs for community-led housing and Gypsy and Traveller accommodation, and to consider the designation of small sites for these uses, when they are developing the design coding plan. This would be in support of the requirement on local authorities, under the London Plan, to plan to meet the identified need for permanent gypsy and traveller pitches in their areas.

At the July 2022 meeting, the Committee also discussed with guests the lack of any national or London-wide design policies or principles on Gypsy and Traveller accommodation. Ilinca Diaconescu, London Gypsies & Travellers, said that there is *'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... 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.'*

From earlier work the Planning and Regeneration Committee has found that where sites for Gypsies and Travellers are provided in London, their location, design and management can vary widely. For instance, sites are often placed near motorways, main highways, refuse sites, electricity substations or other poor or potentially unhealthy environments."

Developing design guidance or design codes for Gypsy and Traveller accommodation would meet the need for an up-to-date, innovative, good quality standard for culturally suitable homes for Gypsy and Traveller communities in London.

Recommendation 2

The GLA should develop London-wide design guidance or design codes for Gypsy and Traveller accommodation. The guidance or design codes should be consulted on as part of work on the new London-wide Gypsy and Traveller Accommodation Needs Assessment (GTANA), which the GLA has commissioned. The Mayor should commit to publishing the guidance or design codes alongside the new GTANA, to support local authorities in meeting the identified needs in the GTANA.

Preserving green space and trees in small sites, and protecting perceived 'underused' small sites

At the July 2022 meeting, there was discussion over how the draft Small Site Design Codes LPG encourages local authorities and developers to improve biodiversity, promote access to green space and improve Londoners' connection with the natural environment.

The LPG states that design codes should ‘*secure net biodiversity gain and no net loss of green cover on minor development*’. However, the Committee found that the LPG needs to go further in ensuring that there are robust illustrative examples of how this can be achieved. For instance, Figure 4.8 on page 21 of the draft Small Site Design Codes LPG gives an illustration of the re-provision of green cover in a small site which has been redeveloped. The Figure shows that a tree may be removed and land built over, as long as a green roof is provided to compensate for the loss of the tree and green space. A Committee member noted in the meeting that this example pays ‘*no attention to the really valuable biodiversity in the soil and the land that is there*’, and recommended that the LPG should give examples on how developers should ‘*preserve the footprint of the existing green space*’ where possible.

Recommendation 3

The Committee recommends that the Small Site Design Codes LPG should include robust illustrative examples demonstrating how developers should preserve the footprint of biodiverse habitats within existing green space where possible, when developing residential small sites.

The Planning and Regeneration Committee also discussed with guests the need to ensure suitable protection for spaces used by existing communities, businesses, and family homes currently located on small sites. The Committee found that the term ‘underused’ appeared in the draft Small Site Design Codes LPG, with reference to green space, playground space and surface carparks. However, it is unclear ‘by whom’ these spaces were considered to be underused and whether data exists to back up this claim.

Emma Talbot (Director of Planning, London Borough of Lewisham) commented that local authorities needed to ask the right questions regarding ‘*how something is used ... 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.*’ She stated that ‘*the role of the LPG... can really set those early questions and those early conversations that need to be had*’.

Recommendation 4

The Committee recommends that the Small Site Design Codes LPG contains additional wording on how local authorities should evaluate the extent to which small sites are ‘underused’, when they are being considered for residential development.

Sunlight in public green spaces and overshadowing by tall buildings

At the July 2022 meeting, the Committee also discussed the draft Housing Design Standards LPG and how it addresses the issue of sunlight and the risk of overshadowing of public green spaces by tall residential buildings. Christopher Woodward, Director, Garden Museum, described the adverse impacts on biodiversity from overshadowing: ‘*If somewhere is overshadowed in winter, seeds and bulbs do not grow... there has been quite a big impact on butterfly habitats with overshadowing because of the temperature triggers in parts of London.*’ He also mentioned the negative impacts on

mental and physical health from lack of access to direct sunlight, citing a report by the Garden Museum raising awareness of the impacts of overshadowing.³

The Committee recommends that the GLA considers evidence submitted by the Garden Museum and other relevant stakeholders on the possible adverse impacts of overshadowing by tall buildings in London, and includes wording in the Housing Design Standards LPG to ensure that developers mitigate possible adverse impacts on biodiversity.

Recommendation 5

The Committee recommends that A1.9 of the Housing Design Standards LPG should be adapted as follows:

*'The orientation and massing of buildings, and the separation distances between them, should ensure that green space and public realm is not ~~unduly~~ overshadowed **to the detriment of health, wellbeing, biodiversity, horticulture or amenity**. Where a building over 30 metres high is proposed, a micro-climate/wind assessment should also be submitted. **[NB]***

Diversity of GLA's outreach on planning consultations

The Committee heard from the GLA at the 20 July meeting about how it promotes planning consultations, such as the consultation on the London Plan Guidance on design, which closed in February 2022. The GLA described a large database which it uses to communicate about consultations, as well as channels such as TalkLondon. It is very important to the Committee to ensure that consultations are circulated and shared with a more diverse range of communities in London. During the meeting I offered to work with the GLA planning team to ensure that consultations reach a wider range of voices.

The Committee recommends that the GLA shares more information regarding the size, make-up and diversity of the GLA Planning Team's consultation database. In particular, the Committee requests that the GLA provide information on how far the consultation database and the database of respondents on the TalkLondon website is representative of the following groups of people. These five groups have been identified by the London Recovery Board as groups who face inequalities that worsened during the pandemic:

- Black and minoritised Londoners
- Deaf and disabled Londoners
- LGBTQ+ Londoners
- Older Londoners
- Women and girls in London

Where possible, the Committee also requests that in its response the GLA provide information on how the following groups of people are represented in the consultation database and the database of respondents on the TalkLondon website:

- young people,
- asylum-seekers and refugees,
- migrant workers,

³ Garden Museum, ['The City that Sold the Sun'](#), March 2022

- care workers,
- people who are homeless,
- social housing tenants,
- people in temporary accommodation,
- low-income households and working-class communities, and
- people in the Private Rented Sector.

Recommendation 6

The GLA should share more information with the Committee regarding the size, make-up and diversity of the GLA Planning Team's consultation database and of the respondents on the TalkLondon website. The Committee will work with the GLA to help to increase the diversity of the consultation database.

I look forward to working with the GLA to follow up on this work.

The Committee would welcome a response by 14 October 2022. Please address your response to Sarah-Jane Gay, Senior Policy Adviser, at Sarah-Jane.Gay@london.gov.uk.

Yours sincerely,



Sakina Sheikh AM
Chair of the Planning and Regeneration Committee