



2 March 2018

Sadiq Khan
Mayor of London
Draft New London Plan: Consultation
GLA City Hall
London Plan Team
Post Point 18
FREEPOST RTJC-XBZZ-GJKZ
LONDON
SE1 2AA

SENT BY EMAIL AND POST 2 MARCH 2018

Dear Mayor Khan

RE: Draft New London Plan — Initial Response from CIAT

The Chartered Institute of Architectural Technologists is the qualifying body for Architectural Technology professionals.

Architectural Technology is the technology of architecture; a creative, innovative design discipline rooted in science and engineering, and an integral discipline within the built environment.

As a design function, it forms the link between design and realisation and relates to the anatomy and physiology of buildings and their production, performance and processes. This is based upon the knowledge and application of science, engineering and technology, which are compliant with regulatory, statutory and legal requirements.

At its core is the anatomy and physiology of a building or structure, its relation to context, how it is assembled and how it performs through form, function and fabric. Architectural Technology achieves efficient and effective construction and robust sustainable design solutions that perform and endure over time. It is an evolving discipline with constant technological advancements in design, construction and the maintenance of living environments.

Our members' competencies are innovative, creative and practical. Their fundamental skills include the ability to consider design holistically, taking into account all aspects of the composition. This includes the vision to run and lead projects from inception to completion, evaluating the client requirements balanced with the performance of the building together with its impact on the environment and the safety of its users.

CIAT welcomes the publication of the draft London Plan and is pleased to note that the Mayor's office has taken an approach that is both strategic and long term, one which should serve as a benchmark for strategic Local Plans throughout the rest of the United Kingdom. This plan looks at ways of accommodating the anticipated economic and population growth that London expects to see for the next 20–25 years. CIAT looks forward to being involved with the implementation of the London Plan to ensure that developments are designed strategically. Architectural Technologists as design specialists will ensure that designs form the link between design and realisation.

The current adopted London Plan, published in 2016 with some amendments in January 2017, sets out the overall strategic plan for London for the development of a London suitable for the next generation. This new plan brings together the geographic and locational aspects of the Mayor's other strategies — including those dealing with: transport, economic development, housing and culture along with a host of other strategic and economic issues that provide the strategic London-wide policy context within which the London Boroughs should set their detailed local planning policies.

A good and comprehensive London Plan is essential in achieving sustainable development, a healthy economy and a more inclusive society. This new draft London Plan will be the 5th incarnation, the first plan being published in 2011.

The current draft plan has been properly researched and has created ambitious but achievable targets and goals that will require the whole construction industry to raise its game to achieve. Goals that we hope and expect the industry to meet. With this in mind, we have concentrated our consultation response in the attached appendix on the key policies that we believe will have the greatest challenges.

Yours sincerely



Francesca Berriman MBE HonD^{Tech} FRSA
Chief Executive

Appendix 1

Initial Response from Chartered Institute of Architectural Technologists on the Draft New London Plan, March 2018

General

Examination In Public — Independent Panel

It is our opinion that the Independent Panel should include those with knowledge of what is achievable in the Built Environment and to this end would welcome the opportunity to become involved to assist the Panel in arriving at workable decisions that can be implemented over time.

Terminology

We note that on pages XVI and 104 the term “architects” is used. This term legally only applies to one design profession. As there are many, and in order not to alienate others in the industry, we would request that for future publications, a generic term is used, such as “designer” to engage all.

Mayor’s Design Advocates

There is no definition of who the Mayor’s Design Advocates are. Again, we would suggest that our members are ideally placed to contribute to this work.

Delivering Quality and affordable Homes

Policy GG4

This policy underpins the targets with which Londoners will measure the success or failure of this plan, irrespective of the wider and strategic elements such as transport and infrastructure. In order to deliver more homes, the promotion of brownfield land is essential (policy H1.B.2) as is the strategic release of previously industrialised land and the promotion of smaller sites, but these are not the only solutions. New innovative means of creating homes, especially affordable homes need to be promoted, but not at all costs and we are pleased to see that the draft plan has re-enforced quality as part of the core of this plan (policy D2 – Delivering good design).

We must however raise some concern regarding the use of specific wording in the plan, a specific example can be found in policy D2.H.4, namely “local planning authorities using architect retention clauses in legal agreements...”. The use of the word “architect” is restricted and there are numerous competent design professionals, such as Chartered Architectural Technologists, who can and do carry out this design role. It is also essential that when engaging designers the ability to design holistically, understanding the technical performance of traditional buildings (i.e. those that were originally constructed under different regulations) is essential to ensure preservation of the fabric and to retrofit appropriately.

In addition, we applaud the reinforcement of mandatory inclusive design. This will help to create more inclusive communities

Policies D1, D2 & D3

We are in agreement with the proposals contained in the plan.

Policy D4

With the demand for space in London so high, it is pleasing to see the internal space standards for all housing, both private and affordable being set at the same level. This, we believe, will bring forward new and innovative design solutions. We are also pleased to see the presumption against gated developments, which by their own definition do not provide an inclusive environment.

Policy D5

We applaud the 10% minimum requirements for all new dwellings to meet the new 'wheelchair user' or 'easily adaptable' standard, although we would suggest that for apartment buildings, this should be increased to include all ground floor properties (or the first accessible floor with a lift) in addition to the minimum 10%. We also believe that the exceptions that have been included would still allow some flexibility in the application of the policy, however the exceptions should be as a last resort.

Policy D6

To achieve the anticipated growth for London, density is key as is the required infrastructure improvements to a transport system that still requires major investment. We commend the promotion of a design-led approach rather than a random density. It is also pleasing to note that design scrutiny features highly in the policy statement.

Policies D7, D8, D9, D10, D12 & D13

We are in agreement with the proposals contained in the plan.

Policy D11

Whilst we acknowledge the requirement for ensuring Fire Safety, we would suggest that implementation and enforcement of Fire Safety should be managed by the Building Regulations and not through planning legislation. It would be our recommendation to work with the groups currently investigating improvements in practices and await the outcomes before committing to processes that may be superseded in the short term.

Increasing Housing Supply

The setting of realistic targets is key to the success of this plan and we are pleased to see targets that are based around individual delivery-focused development plans.

Policies H1, H2, H3 & H4

We are in agreement with the proposals contained in the plan.

Policy H5

As mentioned previously, the delivery of quality affordable housing is one of the main performance indicators that this plan will be measured against and it is pleasing to note that a strategic target of 50 percent has been set for all new homes constructed. The safeguards which have been put in place within the detailed policy sections of the plan must be monitored and enforced to ensure the success of this policy.

Policies H6, H7, H8, H9, H10, H11, H12, H13, H14, H15, H16, H17 & H18

We are in agreement with the proposals contained in the plan.

Social Infrastructure

The interaction and integration of London's population is key to a successful and thriving city. We are pleased at the level of detail and scrutiny that the plan requires London boroughs, through their individual local development plans, to put development proposals through, prior to the granting of consents.

It is also pleasing to see the inclusion of accessible toilet facilities and the requirement to provide provision that meeting the 'Changing Places' standards in larger developments. As such, we are in agreement with the proposals contained in the plan.

Economy

Policies E1 to E11

We are in agreement with the proposals contained in the plan.

Heritage and Culture

Policies HC1 to HC7

We are in agreement with the proposals contained in the plan.

Green Infrastructure and the Natural Environment

London will only flourish if its green spaces are maintained and areas such as the Green Belt are protected with robust and defensible policies that will encourage its use by Londoners and as such we are in agreement with the proposals contained in the plan.

Sustainable Infrastructure

We are in agreement with the proposals contained in the plan. It is also pleasing to note the continual promotion of development proposals that promote the protection and restoration of London's waterways.

Transport

We are in agreement with the proposals contained in the plan, especially as the plan supports the implementation of the Mayor's Transport Strategy which aims to deliver the infrastructure and public realm required to significantly increase levels of walking, cycling and public transport use throughout London. In addition, to cater for long term growth, good transport connectivity is essential and long-term investment in the transport infrastructure must be planned and implemented properly to ensure that the needs of the future population can be met. The requirements for detailed transport assessments for development proposals is one positive way to ensure any impact on the transport infrastructure can be measured and mitigated through the planning process.

The move for new development to reduce reliance on the car is laudable as is the maximum parking standards that will help reduce the reliance on the motor car.

Funding the Plan

We are in general agreement with the proposals contained in the plan.

In summary

CIAT welcomes the publication of the draft London Plan and is pleased to note that the Mayor's office has taken an approach that is both strategic and long term, one which should serve as a benchmark for strategic Local Plans throughout the rest of the United Kingdom. This plan looks at ways of accommodating the anticipated economic and population growth that London expects to see for the next 20–25 years. CIAT looks forward to being involved with the implementation of the London Plan to ensure that developments are designed strategically. Architectural Technologists as design specialists will ensure that designs form the link between design and realisation.

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