

Design Council Response: Consultation on the Draft New London Plan

Background

1. The Design Council is an independent charity, recognised as a leading authority on design. It uses its expertise and insight to improve the quality of people's lives through design
2. Its people-centred approach is focused on delivering positive social, economic and environmental change. It addresses all aspects of design including product, service, user experience and design in the built environment.
3. The Design Council Cabe team works with local planning authorities, developers, design teams, stakeholders and public-sector organisations to support the delivery of well-designed developments at scale.
4. We are unique in offering independent, expert, multi-disciplinary design advice from policy through to practice, to support and unlock complex development. Our independence allows us to work effectively with all parties and stakeholders to broker and accelerate the consistent delivery of well-designed housing and places across the country.

Introduction

5. We support the six Good Growth policies and their general objective to support growth that is socially and economically inclusive and environmentally sustainable. Combined the good growth policies provide a sound set of principles from which to progress the New London Plan. The policies set out in the Spatial Development Patterns chapter represent a strong foundation for a strategic spatial plan for London.
6. The Draft New London Plan has positive goals, new ideas and policies that are focussed on addressing supply, supporting communities and enabling economic growth. It is particularly welcome that the plan seeks to promote good design, in its many facets to deliver a successful plan for London. However, while we welcome many of these policies in terms of their design intentions there is a tension in the plan between its role as a strategic spatial plan and its desire to set prescriptive development management policies for the whole of London. This balance needs to be reviewed to ensure that this document remains an accessible and usable plan, that leaves scope for local plans to deliver on the New London Plan's strategic aims in their own way, responding to local community contexts.
7. The plan proposes many good initiatives for guiding and improving design quality, however these will only be achievable if local planning departments have the right skills and capacity to do this. New innovative approaches will be needed to build the skills,

capacity and confidence within local authorities to embrace a positive design led approach, particularly to higher density development. Meeting the ambitious annual housing delivery targets will not be possible without this. It will also require investment and expansion in the capacity and skills in other areas of the property, construction and infrastructure industries in both the public and private sectors.

8. The plan's focus on housing numbers, whilst understandable, can sometimes read as being at the expense of a focus on the people who will live in and around developments and on the quality of development. This densification will need to be supported by intensification of other uses (e.g. retail, entertainment, employment and community uses) and investment in supporting social and physical infrastructure. Whilst this can be planned for in a strategic way on larger sites and in opportunity areas the plan envisages a significant amount of delivery from smaller sites. We agree with the principle of encouraging development on smaller sites but note that the cumulative impact of this densification will be harder to plan for particularly in outer London with potential long-term impact on local communities.
9. Good design and good planning are intrinsically linked. The form and character of London's buildings and spaces must be appropriate for their location, fit for purpose, respond to the changing needs of Londoners, and make the best use of the city's finite supply of land. We fully support the emphasis on health and wellbeing and inclusive environments within the plan. Tackling these design challenges are crucial to creating a resilient, prosperous and more equal city. Notwithstanding our concern about whether the level of detail within the London Plan is superseding the role of local plans, our main comments on the design policies relate to ensuring that there is an uplift in skills, understanding and capacity to meet the shift in emphasis on design quality that this plan is promoting.

Spatial Development Patterns

10. This chapter responds strongly to the strategic purpose of the London Plan requiring the London boroughs to plan positively for growth in their areas. In general, we support the spatial development patterns set out in Chapter 2 of the Draft New London Plan. The focus on the role of Opportunity Areas and Growth corridors provide a strong basis on which to plan for new housing and commercial development and respond to investment in transport and other infrastructure (e.g. utilities, communications, green space and social infrastructure).
11. We support the continued use of Opportunity Area Planning Frameworks as the first stage of a plan led approach to delivering development in Opportunity Areas. As highlighted previously, this will depend upon bringing skills and capacity into the planning process in new and innovative ways. To facilitate this we highlight the potential for new models of partnership on design advice and support, using tools such as visioning workshops, design review and enabling support to assist with more innovative approaches to consultation and engagement.
12. We support the commitment to regional coordination with partners across the Wider South East as set out in Policies SD2 and SD3. There are clearly mutual benefits in working across boundaries to tackle important strategic issues such as transport, employment, air quality and housing. Establishing joint working through measures such as partnership agreements would be a positive step in tackling these issues. In this process we

recommend the potential role for design support, advice and facilitation services by an independent body such as ourselves.

Usability of the Plan

13. The Draft New London Plan is very detailed for what is supposed to be a strategic plan. It often reads more as a local plan and contains numerous development management focussed policies along-side more strategic policies and policies relating to local plan making. There is often no hierarchy of the importance of individual policies, with the risk that this long list of policies may be used on a pick and choose basis. As a result, The Draft Plan risks being too prescriptive and detailed and may be difficult to read with other layers of the planning system (National Planning Policy Framework, Local Plans and Neighbourhood Plans). The Design chapter provides a good example of this addressing a considerable range of design related issues that ideally should also be covered by local plans.
14. We recommend a careful evaluation of the usability of the plan, particularly for the benefit of local authority officers in development management and those preparing planning applications. It may be worth highlighting all of the policies relevant to the assessment of planning applications and bringing these together as a single set of development management policies. This exercise could also set out more clearly the policies that relate to GLA referable schemes and those that relate to all development.

Housing Numbers

15. In our response to the recent Housing White Paper we argue that quality housing development is integral to building prosperous, sustainable and resilient communities. By focussing on good design development planning should not only consider housing aesthetics and numbers, it should put the needs of people at the centre of housing growth.
16. Well designed housing development should provide quality homes that people need, that they can afford, with the necessary open spaces, physical and social infrastructure that can transform a place. As stated earlier in the plan, whilst densification is required, developments must result in positive impact on people and communities. Providing much needed supply alongside the health, social and economic benefits to local areas that comes from sustainable development.
17. The draft plan promotes highly ambitious housing delivery targets within the confines of the existing city limits. Assuming that these targets are deliverable on a spatial level, we highlight the inherent challenges in delivering this quantum of development and its implications for skills and capacity across the planning, development, construction and infrastructure professions in both the public and private sectors. The deliverability of the plan will depend upon all of these sectors and we would therefore recommend that the GLA seek ways to promote capacity in these sectors. If London is to have more homes, that are sustainable it will also require an intensification in wider physical and social infrastructure to support this new population and improvement in connectivity that promotes walking cycling and public transport.

Affordable Housing

18. We support the Mayor's commitment to delivering genuinely affordable housing and the focus in the new draft London Plan to ensure a consistent approach to thresholds and viability testing is applied throughout London.
19. We support requirement in Policy H5 (a) that public sector land should deliver at least 50% affordable housing across its portfolio, however we are concerned that this aim may be undermined by financial pressure to sell off land. We would encourage that the Mayor should work with public sector bodies to keep land in public ownership and stewardship where possible. Where public sector land is disposed of, its subsequent development should also be subject to the requirement in Policy H5 (a) (4).

Density and Design

20. In the pursuit of housing targets and optimising density it is crucial to ensure that the homes built respond to people's needs. We welcome the proposed policy shift set out in Policy D6 to a design led approach to determining the density for development on sites. The policy highlights particular consideration of i) the site context, ii) its connectivity and accessibility and iii) the capacity of surrounding infrastructure.
21. We recommend the inclusion of 'people' as a fourth key consideration in determining the capacity of a site, to ensure that a consideration of who will live in and near to a development informs how its design, including its density, is determined. This cannot be derived purely by reference to a site's existing context, connectivity or infrastructure. The London Plan should promote not just the optimum housing volume but housing development that drives well-designed places that meet our changing needs and addresses societal challenges, such as poor health and social inequality, as set out in our response to the Housing White Paper. Designing for people is clearly addressed elsewhere in the plan but it is vital its is explicitly stated in this key policy to have real impact (Policy D6).

Small Sites

22. We support the attention given to the role of small sites in meeting London's housing needs, particularly in outer London boroughs. The expectation that such sites can meet 38% of the annual housing target of 65,000 homes appears optimistic and would represent a significant densification of existing neighbourhoods. In Outer London boroughs, where 68% of the total units are expected to be delivered on small sites, there will be a key challenge to plan for this impact through accompanying intensification, improvements to public transport capacity and interconnectivity and to avoid perpetuating a culture of car use. There is potential for this process to bring significant benefits to existing residents and this will be crucial in maintaining support for denser housing schemes.
23. This densification will require an accompanying intensification of other uses (e.g. employment and retail) and of the social infrastructure and transport connectivity required to support a larger population in these areas. In areas outside of zones 1 and 2, public transport is generally focussed on providing access to the centre. The expansion of a local network of public transport outside of zones 1 and 2 is crucial in ensuring suburban

life is more inclusive and sustainable, whilst releasing capacity on routes in to the centre and relieving local congestion.

24. The cumulative impact of small site development will need to be planned for in a positive way. This will mean ensuring that sites are not only developed for housing and that opportunities are taken to ensure that commercial and community uses are also developed/ expanded where required. It will also mean mitigating the impact of building on greener sites, for instance in terms of the impact on ecology, the urban heat island effect and sustainable drainage and we therefore support the assessment of the urban greening factor of developments on small sites.

Infrastructure

25. We support the promotion of Infrastructure Assessments to review the (existing, planned and additional) physical, environmental and social infrastructure required to support new development. This growth requires coordination and planning between the public and private sector – utilities, roads, transport, NHS, primary care, social care and schools. Digital infrastructure is also vital, allowing people to benefit from how technology has and will continue to transform our lives.
26. We welcome the proposed coordinated investment in transport and other infrastructure around growth corridors, as a means of stimulating housing and employment growth which in turn can fund infrastructure investment. In addition to the emphasis on strategic growth corridors, the scale of densification across the city will require a step change in the enhancement of the transport network particularly outside of zones 1 and 2. The healthy streets approach is an important part of this but will need to be supported by greater local connectivity in outer London locations. This level of investment will require a variety of funding sources. We support the continued use of Mayoral CIL as a means of raising funding for strategic infrastructure investment and would recommend that the GLA explore other means and opportunities for land value capture.

Design Scrutiny

27. As a leading provider of Design Review nationally, we support the promotion of its use as a tool to scrutinise and improve the quality of development proposals. Design Review is a tried and tested method of promoting good design and is a cost-effective and efficient way to improve quality. It offers independent, impartial advice on the design of new buildings, landscapes, public spaces and components of the infrastructure networks. We are, however, aware of the limitations of design review as a tool, particularly if not set within a strategic framework and linked to a properly resourced system to take forward the insights gained from its use. Crucially it does not substitute a well-resourced and proactive planning department containing staff with appropriate design skills and knowledge. Requiring schemes to go to design review does not provide a magic bullet to improve/ resolve design quality as ultimately this will need to come from design teams and be approved through the planning system.
28. We are also concerned by the implication in policies D2 and D4 that schemes that are higher in density or height require greater design scrutiny than other schemes. Whilst we agree that higher/ denser/ larger schemes require commensurate scrutiny, the importance

of smaller schemes in shaping the character and liveability of London is often as significant and will often warrant a high level of design scrutiny. Crucially the cumulative impact of these developments is city wide. Clearly, scrutinising smaller schemes will be the remit of local planning authorities rather than the GLA but in our view it would not be advisable to imply that smaller schemes require less design scrutiny or that they are less likely to benefit from tools such as design review.

29. We support the Mayor's guidance on review principles, process and management set out in the draft new London Plan and elsewhere, which are based on our 2013 guidance on 'Design Review: Principles and Practice'.

Feedback from participants on the Design Council's design review process

97% felt Design Council input was helpful in inspiring higher quality design and felt our advice was taken on-board

95% felt our input and advice was helpful at pre-application stage, with 86% believing we had helped unlock design issues. 90% felt we had helped ensure schemes met the needs of users.

98% felt we helped maximise the value of the scheme, with 76% believing we helped expedite the planning process by building consensus. 74% felt we helped schemes improve economic outcomes.¹

Permissions in principle, design codes and development consent orders

30. We support Policy H2's promotion of the use of permissions in principle, design codes and development consent orders to encourage residential development on smaller sites and to give greater certainty to developers. However, their success will be dependent upon having the appropriate skills, experience and resources available to local planning departments. It is imperative that these provisions are underpinned by good design skills and that they avoid unintended consequences, such as dis-incentivising innovative or contextual design responses. It is crucial that the design codes and development consent orders are prepared in a democratic way considering the priorities and concerns of local people. The detailed content of future Supplementary Guidance on design codes will be important and we request that we are consulted on the draft of this SPG.

Maintaining Design Quality

31. We support the emphasis on maintaining design quality after the grant of planning permission in Policy D2 (h). This is another area of planning work that depends upon planning departments having access to capacity and skills, in order to properly understand the detailed design of buildings, construction methods and use of materials.

¹ Results of surveys conducted with local authorities, developer and communities receiving Design Council design advice support since April 2015.

32. We support the promotion of architect retention clauses in legal agreements and note that these could also apply to other members of a design team. These clauses should only be used where appropriate and when consistent with existing contractual agreements. Where planning officers are considering requesting this clause it should be raised as early as possible (e.g. during pre-application stage) and should be appropriately evidenced and reasoned.

Green Infrastructure

33. We support the policies set out in Chapter 8 to protect, enhance and extend London's Green Infrastructure and network of green spaces. Open space will play an increasingly important role in a densifying city environment providing the framework for a healthy and resilient city. Where proximity to an existing green space supports the justification for building at higher densities, developments should contribute to the enhancement and maintenance of those spaces.
34. We support the introduction of an Urban Greening Factor as a means of measuring and assessing the amount of green space being provided by a development. This methodology should not detract from an assessment of the quality and usability of green space within schemes. Developments should be planned and laid out to maximise the potential of these spaces by ensuring they benefit from good environmental conditions and relate well to the development that they are designed to support.

Health and Well-being

35. There is a growing body of evidence that shows how the design of buildings, streets, parks and neighbourhoods can support good physical and mental health, help reduce health inequalities and improve people's wellbeing. Conversely, car-oriented environments and hostile public spaces can contribute to sedentary lifestyles and social isolation, increasing people's risk of disease².
36. We firmly believe healthy environments are fundamental to developing people centred, sustainable and prosperous communities. Designers and planners that consider how a place results in better health outcomes for a population gives the opportunity for development to respond positively to challenges of public health and generate thriving urban spaces.
37. We therefore fully support the 'Healthy Streets Approach' to creating a healthy, inclusive environment in which people choose to walk, cycle and use public transport. This has the potential to improve health and reduce health inequalities. Monitoring the impact of the Healthy Streets Approach and linking this to better local health outcomes in different locations will be a crucial means of assessing the impact and efficacy of these policies. This will help to build an evidence base which could enable a positive cycle of saving and investment.

² Design Council (2014), Active by Design, Guide [\[online\]](#)

Inclusive Environments

38. Creating inclusive environments is central to Design Council work. The built environment can contribute to a more equal, inclusive and cohesive society if the places where we live, the facilities we use and our neighbourhoods and meeting places are designed to be accessible and inclusive.
39. Inclusive places are those where people feel proud to live, businesses choose to invest and the public want to visit. However physical, social, cultural and economic inequalities are still being literally built into new places, with evidence showing that inclusive principles are not being adopted and implemented consistently.³
40. We therefore welcome the requirement for the design of inclusive places set out in Policy D1, connecting firstly to the Mayor ambition to build a city where all Londoners reap the rewards of the city. An inclusive environment is vital to achieving this. It is an environment where everyone can access and live safely, easily and with dignity by all. The diverse needs of the population should be accommodated by mainstream design. People should not have to experience segregation or separate, special treatment due to the design of the environment.
41. Inclusive design is the responsibility of everyone who works in the built environment: planners, those who commission new buildings and places, access consultants, designers, architects, engineers, surveyors, property owners and facilities managers. Our Inclusive Environments CPD training programme will encourage the UK's highly skilled professionals to continue leading the way in building the most accessible and inclusive country in the world.

Design Economy

42. Our analysis shows that 58% of designers in London are 'innovation active', defined as those who have introduced a new or significantly improved product (good or service) or process, engaged in innovation projects not yet complete or abandoned, and/or introduced new and significantly improved forms of organisation, business structures or practices and marketing concepts or strategies.⁴ The presence of such highly skilled and innovative workers drives the supply of as well as demand for sophisticated goods and services, while the scope for knowledge and technology spillovers and face-to-face contact is greater.⁵ This is why we see so many concentrations of design firms and designers, who agglomerate in different parts of the city, from Chelsea to Clerkenwell to Shoreditch.
43. We therefore welcome the proposal in Policy E8 to promote and develop new clusters, including specific reference to design. London's future prosperity significantly depends upon its capacity to support innovative firms, institutions and people such as those in design.⁶ In addition to maintaining the health of current clusters such as those in Hackney,

³ Design Council CABE (2008), Inclusive by Design, {online}

⁴ Design Council, (2017), *Designing a future economy*, [\[online\]](#)

⁵ Department of Business, Innovation and Skills, (2015), Mapping local comparative advantages in innovation: framework and indicators, [\[online\]](#)

⁶ Department of Business, Innovation and Skills, (2015), Mapping local comparative advantages in innovation: framework and indicators, [\[online\]](#)

Islington and Kensington and Chelsea, the Mayor should also explore ways to connect design clusters to other clusters in London, such as Tech City and MedCity. Innovation is generally a multi-faceted activity using assets, capabilities, knowledge, skills and linkages to external resources in complementary combinations. Analysis for BEIS7 in 2010 found that when firms invest in design, they are more likely to invest in other intangible assets such as R&D and marketing. This combination of activities drives innovation, and thus investing in design improves the chances of innovation amongst firms than other intangible assets alone.

44. This should inform how we design places across the city. Synergies are more likely to happen if people are able to meet each other and interact, than if they work and live in areas solely dedicated to one interest or concern. This will not only enable London to maintain its world-leading reputation in areas such as design and technology, but will enable it to be at the forefront of developing new innovations. This means connecting plans for flexible and low-cost workspaces with proposals for new housing developments and infrastructure investment, including digital. Good development in the 21st century involves both providing for existing need as well as enabling future opportunities for ideas to cross-fertilise.

Skills

45. The Plan highlights an important challenge facing the planning, architecture and construction industry in London. The construction industry is one area of the economy exposed to future skills gaps and shortages with an ageing workforce⁸ and high use of migrant labour.⁹ New technologies, such as Building Information Modelling (BIM)¹⁰ and entrants to the industry further underline the need for skills development within construction. Currently there is a shortage of these digital skills amongst the current construction workforce.¹¹
46. Developments such as these are already forcing radical changes to the construction industry. BIM offers the potential to reduce the risk of errors and supports coordination as building design develops and moves into the construction phase. The UK is also witnessing developments in modular construction, off-site fabrication and smart homes with the use of biometric access and remote controls. This means that everyone involved within the built environment – from the architect to the labourer – has to develop new skills and knowledge.
47. The Mayor’s proposals should therefore be developed further, to not only ensure local residents and under-represented groups are provided with good quality training that leads

⁷ Department of Business, Innovation and Skills, (2010), *The economic rationale for a national design policy*, [\[online\]](#)

⁸ The Chartered Institute of Building (2015) *The Impact of the Ageing Population on the Construction Industry* https://www.ciob.org/sites/default/files/CIOB%20research%20-%20The%20Impact%20of%20the%20Ageing%20Population%20on%20the%20Construction%20Industry_0.pdf

⁹ ‘Single market exit: UK construction “could lose 175,000 EU workers”’ *The Guardian* 15 March 2017 <https://www.theguardian.com/business/2017/mar/15/single-market-exit-brexit-uk-construction-sector-lose-175000-eu-workers>

¹⁰ BIM describes the process of designing a building collaboratively using a unified digital platform rather than separate sets of drawings.

¹¹ Farmer, M., (2016), *The Farmer Review of the UK Construction Labour Model*, <http://www.constructionleadershipcouncil.co.uk/wp-content/uploads/2016/10/Farmer-Review.pdf>

to sustainable employment, but should also ensure they are provided with the skills the industry will need in the future and which will also set them up for the long-term. Our analysis suggests that if successfully implemented, addressing skills gaps in the architecture and built environment sectors alone could add an extra £33m to London's economy.¹²

¹² Design Council, (2017), *Designing a future economy*, [\[online\]](#)