

# Urban Design London's Response to EiP Matter 34: Good Design

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M34. Would policies D1 and D2 provide a justified and effective approach to delivering good design? In particular:

**a) Would the approach to delivering good design meet the good growth objectives set out in policies GG1, GG2, GG3 and GG4?**

Good Growth appears to be the Mayors interpretation of key NPPF policies – the presumption in favour of sustainable development and planning to meet housing targets. So the good growth policies can be seen as the London interpretation of these national objectives, explaining what 'sustainable' means for London and setting out how development should be managed for public good, to achieve good growth, not just growth.

The design policies are the articulation of the physical environment elements of this. They set out how the balance between the maximum that can be achieved, in floorspace and profit from any particular site, should be tempered by an understanding of what the development should provide beyond its own profit, for the public good, and the acceptability of the impact it will have on the way the city performs, its people, communities, natural systems and economies. As such, the design policies offer a comprehensive approach to the management of relevant issues.

Some will argue that the policies are too prescriptive, that they cover issues not of strategic importance and will hamper delivery. We disagree, as the issues covered are fundamental to achieving good design and so good growth. The design policies do not say exactly how individual schemes or area plans should be considered, but they explain what types of things should be taken into account. We would argue that this is what strategic policies are about, setting the foundations for local interpretation and detail.

Others will say that the policies are not prescriptive or restrictive enough; creating too permissive a system that could lead to the ruin of London, its character and distinctiveness. As mentioned above, we feel that the policies provide an adequate balance under the umbrella of the NPPF and allow for local interpretation and detail to respond to particular contexts and concerns.

So in theory, we feel that the design policies will help to ensure that the good growth objectives are met. But in practice, there are likely to be challenges. Firstly, housing targets and the general pro development climate within planning can make it harder to secure design quality. Not a London Plan issue, but the permitted development rights for office conversions to residential units are a case in point; they can produce poor quality results and undermine local authorities ability to negotiate for good design when planning permission is required. So, we have concerns that although the design policies have responsible aims, they will be trumped by pro-development policies and processes, and so have less impact than they should.

Secondly, the design policies call for a significant amount of proactive planning and scheme assessment work. They require design skills, and understanding from local

authorities, developers and their agents. UDL has been working to support such skills across London's public sector for the last 15 years. We have seen a marked improvement in skills, ambitions, and the quality of outcomes over the years. But current funding issues mean that although there are many highly skilled and committed practitioners, who we have every confidence will embrace and work hard to deliver the plan's design policies, there are just not enough people with the right skills and experience to cope with the work load.

At the same time, skills are required in the private sector. London has many wonderful architects and other professionals, and lots of exemplar schemes built and proposed. But all architects, consultant planners, transport planners and commercial development experts need good design skills and understanding at one level or another if the plan's policies are to be implemented properly. Clients also need to know what is required and what will, or will not, get planning permission and to require design savvy work from their consultants.

It may not be appropriate for the London Plan itself to make comment on skills and capacity needed to deliver its policies, but we suggest the GLA use its Good Growth By Design programme to continue to take such issues forward.

Turning now to the relationship between design, density and housing capacity. We support the design led approach set out in the plan, but are concerned about how this could play out in reality. There can be a feeling that ever higher densities are achievable if schemes are well designed. Of course, good design can improve proposals, for example better layouts can often fit more onto sites. But there is only so far even the best design can go in making a proposal acceptable against the plans policy objectives. So we are keen that robust understanding of design quality requirements feed into SHLAA work, particular for newer types of delivery such as small sites.

One important element of the plan is the reduction in car dependency, reducing car storage and movement space requirements and so allowing for higher housing densities. We have some concerns about the way this is being applied to suburban areas in particular. As set out in M39, we consider that more guidance would be useful on how to understand, improve and manage local neighbourhood level accessibility to support car-light or car-free lifestyles in suburban areas. We feel that simply increasing densities around either a suburban station, or a suburban town centre or PTAL 3-5 will not achieve active travel and good growth by itself. We suggest that good public transport accessibility, good access to commuting services AND good access to local facilities within a well-connected mixed use neighbourhood are all required to achieve good growth. The alternative is what could be described as 'intensive sprawl' - increasing the number of people living in car dependant, isolated places.

As such, we strongly urge the GLA to support their design and good growth policies with guidance on how to create and maintain car lite, active, vibrant and healthy neighbourhoods, particularly in suburban neighbourhoods, and to require this to be done as a pre requisite of increasing densities in such areas.

In matter M39 we mention how the relationship between higher densities and car parking should be kept in mind. In particular at higher densities in accessible places, where there is no surface car parking, we feel that the logic between higher accessibility and higher densities falls away. We support the way the design policies call for greater scrutiny in such cases, but we would also suggest that the plan makes

it clearer that being sat on top of a station, or 3 minutes walk away from it, should not justify a higher density proposal, that is, that the higher accessibility/higher density concept should stop at a certain level. Instead, as the plan indicates, contextual and performance issues should drive designs and density figures should fall from this, rather than be an input to it.

**b) In light of the requirements of policies D1 and D2 would they be effective in achieving the level of growth envisaged?**

As mentioned above we feel that the design policies support growth but help to ensure it brings positive benefits for London. They represent a good balance between permissiveness and management. UDL recognises that to achieve higher densities, development should be allowed to challenge the existing context, but in the way set out locally in line with the design policies. This goes beyond D1 and D2 and also requires the successful application of D4, D6 and D8.

The Plan is saying what boroughs should do in terms of proactive planning and scheme assessment, not doing it for them. Therefore the requirements are appropriate for the strategic level and allow for local interpretation and response to growth and other priorities area by area.

**c) Would policies D1 and D2 provide an effective framework to protect the distinctiveness of different parts of London, with particular regard to their social, economic, cultural and residential characteristics?**

We support the ambition and scope of policy D2. It is refreshing to see a planning policy dealing with planning process. We feel this should have a positive impact on the quality of London's built environment.

However we have a concern over the relationship between parts A and B of this policy. Part A reads very much like a character appraisal exercise – collecting information about a place. Part B then talks about using this data, but it leaves open some significant questions about how the data should be interpreted and informs local growth options beyond mention of optimising sites. Some may assume responding to local context means keeping things as they are, others will say it means creating new character. It is an understandably subjective part of planning, but the plan could provide more of a strategic steer on this, or, the GLA might like to consider providing further guidance with examples.

Policy D8 usefully refers to the consideration of cumulative impacts. We suggest that such issues are also relevant for small scale changes across a neighbourhood, something given significant prominence in the plan. We suggest that the plan needs good neighbourhood scale strategies to achieve its objectives but are unconvinced that we have sufficient methodologies, experience or examples to make this happen across London. We would very much like to see further work and guidance on this, linking neighbourhood level movement networks, land uses, forms and characters to a more nuanced approach to managing incremental and small sites development.

- d) Would the approach taken to design scrutiny be justified and effective? Would the proposed use of masterplans and design codes, as set out in Policy D2D, help to bring forward development and ensure high quality design? Would the proposed use of design review, as set out in Policy D2F, be justified and effective? In this regard, would the policies deal with strategic planning matters?**

UDL supports the approach taken to design scrutiny. The proposed measures (masterplans, design codes and design reviews) are techniques needed to apply policy and clarity on what is or is not acceptable. They are also supported in the NPPF. However these may not be the only techniques that will help and the plan should support the development of new methods where possible, for example as mentioned above, ways of creating holistic strategies for existing neighbourhoods.

UDL has supported boroughs in the design review process, and hopes to continue its supportive role to develop shared monitoring and reporting systems. UDL also hopes to continue providing training to chairs and panel members and collecting feedback to ensure review services continue to strengthen and remain part of delivering design in the city.

We would like to see further guidance on performance standards for some of the assessment criteria set out in policies and text. We have some quantitative requirements for internal housing issues within policy D4, and a good list of other things to consider in supporting text. But we do not have corresponding quantitative thresholds for public or shared outdoor space issues and we have less help in benchmarking qualitative assessments. If the GLA were able to provide further guidance to support the consistent application of all design quality assessment requirements that would be very beneficial.

- e) Bearing in mind the resource implications for boroughs in carrying out Policy D2A1-11, would it be effective?**

UDL exists to promote skills and resources on this subject and will continue to do so. The programme is cost effective; boroughs pay £4,000 per year to attend the sessions which cover a range of design related topics. UDL is supported by the Mayor's teams and our services will help boroughs in carrying out the relevant policies.

- f) How would the policies be monitored, given the nature of many of the requirements?**

UDL is working with the GLA on monitoring, for example regarding the use of design review panels. However, we recommend further research is considered as part of the process, looking at the general impact of the plan on the character and form of London and its neighbourhoods, as well as formal monitoring.

**g) Overall, would the policies provide an effective and justified strategic framework for the preparation of local plans and neighbourhood plans and development management in relation to this matter?**

Yes, however as mentioned, further work on proactive planning at a neighbourhood level is recommended, to support the transition from policy D2 to more local requirements. Attention should also be paid to the skills and capacity of staff across the built environment sector to deliver the plans ambitious design objectives.