



HTA Design LLP
78 Chamber Street
London E1 8BL

020 7485 8555
info@hta.co.uk
www.hta.co.uk

Chair:
Benjamin Derbyshire
Dip Arch Cantab RIBA

Managing Partner:
Simon Bayliss
MA Dip Arch Dip UD

Partners:
Mike De'Ath
BA (Hons) Dip Arch RIBA FRSA
Colin Ainger
BA (Hons)
Caroline Dove
MA (Hons) Dip Arch RIBA
Sandy Morrison
B Arch RIBA
James Lord
BA (Hons) BLA CMLI
Rory Bergin
B Arch MSc
Lucy Smith
BA (Hons) MSc
Dr Riëtte Oosthuizen
BA (Hons) MA PhD
Simon Toplis
MA Dip Arch
Tim Crowther
BA (Hons) B Arch RIBA
John Gray
B Arch (Hons) Dip Arch RIBA

Directors:
Rajiv Ranjan
B Eng MBA
John Nsiah
BSc (Hons) Dip Arch

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Dear Sadiq Khan,

HTA Design Response to the Draft New London Plan

I am writing on behalf of HTA Design LLP in response to the recently published Draft London Plan. We welcome the opportunity to share our views and we hope our industry experience can make a valuable contribution to the process of formulating a new Plan for London.

We have structured our response around the chapters set out within the draft Plan. Where appropriate, we have referred to our own experience.

HTA Design Practice Profile

HTA Design LLP is an award-winning multidisciplinary consultancy working in the residential development and regeneration sectors. We are a top AJ 100 practice and listed in the UK's top 200 Consultants with over 40 years of experience providing comprehensive services to Local Authorities, Registered Housing Providers, Housebuilders, Constructors and Developers. We are renowned for working with housing providers and local communities to create and deliver great buildings and places through collaboration. Our Planning team won the Planner Planning Consultancy of the Year Award in 2017. We are passionate about the provision of good quality spaces loved by people.

Our core services are the delivery of a wide range of private and affordable housing, major redevelopment and regeneration projects (both new-build and refurbishment) and estate modernisation. In addition we have expertise in a range of specialist housing including:

- Purpose-built Private Rent (Build to Rent)
- Mixed-use Developments
- Housing for People with Disabilities and Special Needs
- Listed Buildings and Heritage
- Custom-Build



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- Off-site Manufacture
- Extra Care
- Housing for the Third Age
- Hotels and Student Accommodation

The practice is recognised for driving innovation and improvement in the quality of housing and has won numerous design awards for exemplar projects.

We are particularly enthused about the emphasis with the plan on optimisation of density in appropriate locations (with appropriate management regimes) and the contribution that could be made by small sites to solve London's housing crisis. Small sites are some of the most difficult to get through the planning process; yet, they have immense potential.

Kind regards

Riette Oosthuizen

Planning Partner

HTA Design LLP



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HTA DESIGN RESPONSE TO THE DRAFT NEW LONDON PLAN

HTA Design support the broad principles set out within the plan of delivering 'good growth,' increasing the supply of housing, and in particular we are glad to see this includes a focus on supporting housing to come forward through a range of sources, including small sites and build to rent. We are also pleased to see a recognition of the contribution Outer London boroughs can make to housing. Through our 'Supurbia' work we have demonstrated capacity for at least 360,000 additional homes in areas with good connectivity. These stations are not necessarily located in town centres, but they have 'place potential', i.e. the potential to add significant additional numbers of additional homes through careful design coding and a more permissive planning regime in these locations.

We also welcome the significant emphasis throughout the plan on the benefits and value of good design. We believe that the shift of the policies to give greater consideration to design aspects which consider proposals as a whole is an extremely positive move.

Chapter 1: Good Growth Policies

We welcome the aspirations to focus on embedding good design into the heart of growth set out in the good growth policies. We believe there is a great opportunity through design of new developments to deliver many of the aspirations set out within the plan. It is good to see a number of cross-cutting policies within this section that lay out the starting point for the rest of the plan, with a focus overall on good place-making. These policies would require local authorities to think more carefully about the future growth of their areas. This type of pro-active approach is not currently imbedded across all London boroughs.

Chapter 2: Spatial Development Patterns

The Spatial approach of the plan, with a strong and clear framework of strategic focus for regeneration is supported. In addition to the public transport led approach to strategic spatial planning, to genuinely give primacy and emphasis to the importance of active travel the spatial strategy outlined in Chapter 2 should outline the planned routes for significant cycling infrastructure, as well as planned public transport infrastructure improvements or extensions. For example, the section could map out the recently announced six new segregated cycle routes planned (30.01.2018), as well as mapping out the boroughs identified later in the draft Plan to be the focus of improved cycling infrastructure and facilities, which will be brought forward through SPDs. In addition, we would suggest that the strategic green and blue corridors across the borough that encourage active travel between different parts of the city, could be highlighted within this chapter.



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Chapter 3: Design

The continued emphasis on good design and good growth are welcomed. The move away from the density matrix to much more site specific accessibility consideration in lieu of density makes a lot of sense. We welcome the increased detail and clarity in the revised approach around how the proposed density of schemes should be considered, including the need for development proposals to consider not only the public transport accessibility, but also the connectivity of a site through walking and cycling. In order to provide decision makers with a better comparison we would query whether the use of the cycling accessibility level or "CY-TAL" should be encouraged and incorporated into the London Plan.

It is also good to see recognition within the plan that the development potential of sites does not just consider connective to central London, but also to other important amenities such as social infrastructure and town centres (paragraph 3.6.5); we would encourage the Mayor to consider including this within the policy text itself to ensure this is given the appropriate level of weight in assessing proposals.

The proposal to require all schemes referable to the mayor for tall buildings or those over the density guidelines to have undergone a Design Review Panel process prior to submission of a planning application is sensible and one we would support. We also support the introduction of management plans in instances where density levels proposed are high for PTAL ratings. We would encourage the Mayor to strengthen this requirement by requiring boroughs to incorporate this requirement into Section 106 agreements. The management regime of high density schemes are critical to their success. It is one of the most significant lessons we are learning from Built to Rent schemes.

On Design Scrutiny (Policy D2G), we would recommend that a line is included to encourage boroughs to also ensure consistency in design reviewers if a scheme is reviewed more than once.

We also strongly welcome the recognition that the qualitative aspects of development are a key part of ensuring successful sustainable housing (Policy D4C). In our experience some boroughs who are less supportive of development proposals can overlook these aspects. We would therefore suggest the Mayor adds further clarity to how much weight should be given to these aspects. We would recommend that 'qualitative aspects' are clarified by giving a number of examples.

Whilst we believe retaining the architect throughout can be a desirable mode of procurement, ensuring commitment from the developer in delivering the consented scheme is far more



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important, and for this the consented scheme must be realistic, deliverable and viable. It is hard to see how boroughs would be able to enforce retention of the architect through legal agreement. Architects can be quite vulnerable where it comes to novation agreements.

In line with the healthy street approach woven throughout the plan it is good to see a strong emphasis on good design of the public realm, including a particular focus on the experience for pedestrians and cyclists.

We also support the intention set out by the Mayor of creating a 'Public London Charter' to ensure that privately owned public space can contribute to broader aspirations such as encouraging active travel. It is also good to see consideration given to the effective management and ongoing maintenance of public realm. This is another good opportunity for boroughs to think more strategically and proactively about the future of their areas, and it could be incorporated in design codes for specific areas.

It is good to see that the design implications of small sites have been carefully considered within the detail of the plan. For example we welcome the recognition that in some circumstances, the provision of a lift to dwelling entrances is not achievable, but can be considered acceptable.

The policy on Tall Buildings and the recognition that they have a role to play in helping London accommodate growth is good to see. Based on our experience of balancing the competing requirements for tall buildings, including the need to provide active frontages and a well design sequence of entrance spaces, provide adequate refuse and recycling storage, as well as adequate space for secure bike parking, we would strongly advise the Mayor to carefully consider and set out his priorities in meeting these requirements, and the Mayor's preferred approach to the incorporation of basements to accommodate these various needs. We believe a policy to effectively guide and shape the quality and contribution tall buildings can make to our city will not be able to be do so effectively unless it gives proper consideration to the realities of this form of building and sets a clear expectation for the balance to be achieved between ancillary servicing functions, and the need to provide active frontages to contribute to the street scene.

The introduction of the Agent of Change principle is encouraging. We do however have significant concerns around the implementation of Policy D13 Part (A4) and Part B. Whilst we support and encourage the mitigation of noise through careful design measures, the introduction of Tranquil Areas, Quiet Areas and spaces of relative tranquillity could undermine the implementation



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of a number of other London Plan policies, for example play space and active frontages. If the London Plan is advocating good growth in urban locations we strongly feel that the GLA should guide London boroughs on how to define Tranquil Areas, Quiet Areas and spaces of relative tranquillity, as otherwise this could sterilise a significant number of potential development sites, particularly concerning the intensification of outer London boroughs. In the same vein, clarification is needed for applicants how to approach sites that have been identified as a Quiet Area but offer the opportunity to provide much needed infill housing. Often the reorganisation of open space is crucial to facilitate regeneration spaces and formalising the use of Tranquil Areas, Quiet Areas and spaces of relative tranquillity could restrict future development opportunities. The Draft London Plan refers to guidance prepared by DEFRA however it notes that "*Defra does not intend to set noise thresholds to steer the consideration of proposed quiet areas; determining the 'quietness' or 'relative quietness' of these spaces and associated benefits is a matter for local discretion*". Entrusting this to be determined at the local level may lead to applicants facing further delays in the planning process due to disagreements over what constitutes as 'quiet'. It is here that the London Plan needs to be strengthened so that this ambiguity is removed. To reiterate, we support the Agent of Change Principle, good acoustics design inside buildings and the introduction of soundscapes within new landscapes. However we have concerns about the introduction of Tranquil Areas, Quiet Areas and spaces of relative tranquillity which may inadvertently undermine the strategic ambitions of the London Plan to deliver good growth.

Chapter 4: Housing

The Draft Plan makes an evident and concerted effort to enable delivery of housing through a range of avenues including through traditional housebuilder models for sale, but also through build to rent and delivery of small-sites by SME builders. Creating a less prohibitive development environment for a range of types of players is strongly supported and we believe that diversifying the contributors of housing development will help to increase the number of homes that can be delivered in London.

HTA Design have long advocated for the latent capacity for housing within Outer London. We are hugely encouraged by the focus on small sites within the new London Plan. We have long campaigned in terms of the contribution that could be made by small sites - even gardens - within Outer London through our Supurbia work, so this the presumption in favour of small sites is a welcome change. In particular it is encouraging that local authorities are encouraged to develop design codes to ensure that suburban areas could intensify in a controlled fashion. The provision within the plan to indicate specific small site housing targets for individual boroughs is also very much welcomed, as we believe this separation will help



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compel local authorities to seriously consider how they can help or encourage bring forward small sites within their borough.

The continued recognition of the distinct economics of the build to rent development model and support for its delivery from the Mayor is strongly supported by HTA Design. We believe that build to rent can provide a distinct offer suited to provide homes to suit particular needs and can also help to enable The Draft Plan provides clarification on what will be considered to constitute Build to Rent, and therefore would be assessed against Build to Rent policies; this clarification is welcomed. Also welcomed is the ability for build to rent schemes to benefit from the 'fast-track' viability process as set out within the Mayor's Affordable Housing and Viability SPG last year.

We would suggest that the Mayor gives consideration to how the government announcement last year relating to the intention of banning of leasehold homes may impact on delivery models in the capital, and consider whether London specific guidance is appropriate. In particular, the delivery of housing through innovative models such as Naked House should be encouraged and the London Plan should support these.

Finding a mechanism to increase the delivery of affordable housing is essential if we want to build a successful future for London but the latest Annual Monitoring Report published by the GLA confirms that the viability led approach of the past three years has produced affordable housing at an average of just 24% of conventional housing supply. Measures set in place by the GLA to make viability assessment more transparent is a very positive step in gaining the support for development from local communities and it seems likely that once the affordable housing requirements become established the impact will feed through to reduced land values.

We fully support the Mayor's notion that large amounts of Green Belt do not need to be released to facilitate London's growth and housing need. However, there are left over portions of green belt land within London that have become surrounded with transport infrastructure and other uses, that offer little biodiversity value and no access to green spaces for people, and it is important that these portions of land do not get protected at all cost. It is of utmost importance to very carefully approach what type of interventions would support healthy outcomes for London's residents: as London's existing fabric increases in density, we need to ensure accessibility for everyone to healthy, good quality green spaces. It is of utmost importance that, in instances where green space is protected, it provides a function to the public in terms of leisure, relaxation and activity. We cannot afford to protect 'green belt' that



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is not accessible to the public, in private ownership, and not fulfilling a function of providing some type of breathing space for Londoners.

The Draft Plan recommends that prescriptive housing mix targets for market and intermediate housing are removed from borough's development plans. We are supportive of this approach which enables greater flexibility for delivery of housing size mix to be considered more flexibly for private tenures. Similarly, it is good to see the Mayor considering introduction of flexibility in the approach to the delivery of affordable housing, through provisions for delivery to be considered on a portfolio basis, rather than a site by site basis.

Chapter 5: Social Infrastructure

Though housing and the environment are clearly high on the agenda it is good to see the role and value of social infrastructure, particularly in enabling community cohesion, recognised as a valuable aspect of London that must be retained and encouraged. In particular we welcome the recognition of the multiple roles town centres can play in a changing society beyond purely a retail destination, but also through a place that is valuable to civic life.

Chapter 8: Green Infrastructure and Natural Environment

Policy G5 encourages boroughs to introduce their own 'urban greening factors.' This places a significant emphasis on the provision of urban green cover, including street trees, green roofs, green walls and rain gardens. The overall aspiration is supported, however there are aspects of this policy which we believe require further refinement. Though green walls and roofs can undoubtedly contribute to strategic issues such as water management and air quality improvement which are of significant importance they offer fewer benefits in terms of creating improved access to green space for people living nearby. In particular, the weighting of different types of spaces such as amenity grassland and permeable paving, which are often used to provide valuable usable amenity space to residents within residential developments could be detrimentally affected by the low suggested weighting of these elements. The interrelationship between access to green space, the quality of these spaces, and the other aspects needs to be given further consideration.

In addition, we would suggest the Mayor gives further consideration to how he envisages elements such as green roofs and green walls will be maintained in the long term, whether these will be secured through planning obligations or otherwise. This should be incorporated into the plan to give developers certainty of the expectations around this so allowance is made from an early stage for costing of urban green elements.



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We would be interested to understand whether the potential cost of the 'urban greening factor' (and its maintenance over time) has been tested in terms of typical scheme viability. It could have a significant impact.

In Policy G8 relating to food growing the Mayor should give consideration to placing provisions within the plan that enable boroughs to secure adequate replacement allotments in alternative locations, where this is appropriate, for example to improve accessibility of allotments, or to facilitate the best use of land to be made.

Chapter 9: Sustainable Infrastructure

Policy SI13B1 suggests development should give consideration to provision of rainwater harvesting including blue roofs; the technical feasibility and cost of delivering such solutions. In addition, roofs of developments are under pressure to function efficiently, with competing demand to be used as rooftop amenity space or children's play space, green and brown roofs, blue roofs, and space for photovoltaic cells, amongst other items not necessarily of strategic priorities, but often needed from a functional perspective to deliver buildings, such as rooftop plants, or telecommunications equipment. This is particularly relevant to higher density development. The Mayor should give stronger consideration, and outline clearer guidance on his priorities for how roofspace should be used in development proposals. With changes expected within the NPPF regarding permitted development rights for 'building up', we would be interested to see if the Mayor would consider incorporating specific London wide guidance on considerations for these this type of development and other competing considerations that should be incorporated at this small scale to ensure the maintenance of sustainable infrastructure.

Chapter 10: Transport

We are particularly supportive of the requirement to promote more sustainable methods of transport in *all* areas of good public transport accessibility, including within Outer London. Reduced car parking levels will not only support optimising use of land for housing but also make significant contribution to the capitals ability to control and improve air quality. We are also very supportive of the increased support for cycling and other means of active transport in conjunction with use of public transport.

In policy T5 the Mayor makes provision for enabling developers to consider acceptable off-site solutions for cycle parking. The evident consideration of the constraints faced when developing small sites is welcomed. However, it may be beneficial to clarify the circumstances off-site cycle parking solutions would be considered acceptable. An over reliance on this solution could potentially detract from the otherwise positive street scenes created in line with the healthy street agenda.



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Conclusion

In conclusion, we support the general aspirations set out within the Draft London Plan, and the increased emphasis on design quality, as well as the intention to promote housing delivery from a range of sources. We hope our additional insights and suggestions are of value and look forward to seeing future iterations of the Draft Plan.