

From: Sarah Eley <Sarah.Eley@hta.co.uk>
Sent: 09 December 2016 13:04
To: Your Views
Cc: Riette Oosthuizen
Subject: HTA Design LLP Response to 'A City for all Londoners'

Dear Sir / Madam,

Below we set out our response to the recently published 'A City for all Londoners'.

Response to 'A City for all Londoners'

HTA Design LLP, an award winning multi-disciplinary design practice, welcomes the opportunity to respond to a 'City for All Londoners'.

The document has an inviting, collaborative tone, with strong messages we support. We would welcome further engagement with the GLA where it comes to matters of innovation in housing delivery. Over the last year, our practice has engaged with GLA officers responsible for developing the new London Plan to share ideas around new models of suburban densification and rooftop development.

We strongly support the rethinking of London-wide density policies, and the Mayor's support for the contribution that can be made by small sites and small and medium sized enterprises to alleviating the housing crisis. We welcome a much wider definition of affordable housing.

The housing crisis needs to be tackled from every angle; it is not just about delivering numbers. We look at innovation across all stages of housing delivery: planning tools that would encourage greater freedom and innovation within the current legal framework to deliver housing supported by the people most affected by it, modern methods of construction that could be delivered quicker with less disruption, and working with clients interested in developing a wide range of different housing products such as Built to Rent, Pocket Homes, custom build housing, Naked House, high density housing, student housing, housing for the elderly and sustainable housing delivered through off-site manufacturing.

We are hugely supportive of the notion that the 'right kind of housing' needs to be built. We couldn't agree more.

We would like to emphasise that the worthy aspirations of the consultation document can only be delivered by harnessing top quality design. Therefore, the Mayor should waste no time in re-convening the Mayor's Design Advisory Panel.

We have selected a few specific topic areas within 'City for all Londoners' which we would like to comment on:

Housing numbers and delivery

One of the key objectives of the Mayor's Statement is to increase housing, due to a failure to keep pace with demand, and this is welcomed. The provision of an additional 50,000 homes per annum is an ambitious and much needed target. Numbers alone, however, should not be the sole focus. Measures to ensure high quality durable new buildings, their contribution to long term health and well-being, their flexibility and the long term impact of materials used in terms of maintenance costs and sustainability should be core elements of policy to support working towards the housing target.

The Statement recognises that the housing industry is currently dominated by a small number of large developers, and that smaller housebuilders and new development models such as Build-to-Rent should be supported. We welcome this proposal. Small and medium sized housebuilders will be able to take on the challenge of developing smaller sites, which are specifically mentioned in the Statement as a location for development, and new development models will be important in the delivery of the new housing target.

Higher density housing around transport hubs

The identification of growth locations which include well-connected transport hubs is supported. The London Plan Density Matrix, while recognising that density should respond to the local context, has long been considered to have its limitations. It is appropriate to revise the density matrix, allowing for higher densities in locations which are well connected by public transport whether they are in central, urban or suburban locations, while ensuring that the efficient functioning of the transport infrastructure is also supported. Central London Boroughs frequently permit developments which are found to be of acceptable design quality, while overriding existing density guidance.

We support the notion that tall buildings should only be permitted if they are in line with the principle of 'good growth', i.e. making a positive contribution to the streetscape and skyline, and careful account must be taken of the way these buildings relate to activities at ground level.

Superdensity: The Sequel (2015), a piece of work undertaken by HTA Design in collaboration with Levitt Bernstein, Pollard Thomas Edwards, and PRP Architects which follows on from the first Superdensity report in 2007, gives guidance on how high densities can be combined with familiar, liveable streets that create successful and sustainable cities.

Growth in suburban areas

We welcome the Mayor's intentions to accelerate housing delivery by working with a wide range of possible providers, such as councils, housing associations, developers, homebuilders, investors and others. HTA Design are currently advising a number of London boroughs on their housebuilding programmes on small and larger sites including the boroughs of Islington, Enfield, Barnet, Ealing, Croydon and Lambeth. Local authority owned small sites could make a significant contribution to housing delivery, and we find that local authority clients tend to support high quality buildings and standards of design. However, despite delivering more affordable homes, some of these sites get stuck in the planning process due to different views about 'local character'. Whilst it is important to assess how new buildings fit in with its surroundings, and to ensure that the quality of new development is of excellent standard, planning approaches that allow some level of flexibility in policy application to support the delivery of new affordable homes (just like there is increasing recognition for the need for flexibility to deliver Build to Rent products) is required. For example, we have seen local authority housebuilding schemes being delayed in the planning process for reasons such as the perceived need to follow the exact pattern of development found in the area surrounding a site, i.e. breaks in between rows of houses or exactly similar sized back gardens or front/back garden arrangements.

The Mayor's Statement supports smaller-scale housing development, on smaller sites, in appropriate suburban locations. Reference is made to the introduction of "planning policies that promote smaller sites, particularly in suburban areas". We are very supportive of this notion. HTA Design has undertaken research and developed design options for the intensification of suburbs. 'Transforming Suburbia' published in 2015 in conjunction with Pollard Thomas Edwards (http://www.pollardthomasedwards.co.uk/download/supurbia-semipermissive_v5_LR.pdf) sets out HTA Design's strategy for 'Supurbia' which takes a two-fold approach: redeveloping the local main streets and parades as mixed use places with increased housing (such as through permitted development rights for rooftop development), and enabling owner-occupiers to develop their land through plot intensification. The report outlines the proposed 'plot passports', a form of permitted development, which would support intensification through a menu of redevelopment options.

The Sixth Report by the Outer London Commission 'Removing the Barriers to Housing Delivery' (March 2016) noted research by HTA Design which suggested doubling the density of just 10% of homes in Outer London Boroughs could create one million new homes. HTA Design is currently conducting further research on practical ways to make 'Supurbia' work.

Modern methods of construction and off-site manufactured components could also make a huge contribution to delivering housing growth on small sites, lessening the impact of construction work.

We welcome the notion of 'Inclusive Neighbourhoods', i.e. neighbourhoods fostering social integration. To deliver housing that fosters social integration and make provision for all, it is absolutely necessary that local authorities are encouraged to update housing needs assessments which are often out of date and formulate a clear understanding of specific housing need in their areas across all groups. Whilst 'City for all Londoners' talks about health in Section 5, it would be good to see the housing agenda completely entwined with health. Whilst many boroughs now expect Health Impact Assessments as part of planning submissions, these tend to focus on a 'theoretical future population'. As a sector we have very little understanding of the health impact of new communities and places on the people who live in it. It would be good to create an open forum for feedback.

Support for More Affordable Homes

We support the provisions made in the draft Homes for Londoners SPG to widen the scope of affordability through the range of products that could be considered to be affordable housing and inclusion of a London Living Rent and low cost market rent. It is likely that the market and land values will have to adjust.

Private Rented Sector

The recognition that the private rented sector provides housing for an increasing number of Londoners, and that this sector should be supported, is welcomed. HTA Design has designed schemes that offer a variety of unit sizes and rental packages, which are aimed at a broad socio-demographic profile. We support the proposal to review policy in light of the distinct economies that support build-to-rent, and the development of innovative construction methods. However, we consider that an emphasis on quality materials should be an integral part of this, to ensure that the housing stock in this growing sector, has longevity.

Estate regeneration

The focus of the Mayor's Statement on increasing housing targets, supported through higher densities, is welcomed. However, many Londoners live on existing housing estates, many of which were built in the mid to latter part of the 20th century, which are not only in need of refurbishment but also present an opportunity to increase housing numbers through infill development. The regeneration of estates, which forms a core part of our work at HTA Design, needs policy support in the New London Plan. The long term maintenance impacts of new housing solutions need to be considered. Funding support should not purely be focussed on solutions that require wholesale

demolition. Many of London's estates that are being torn down are the result of housing stock that has not been appropriately maintained as an asset. Ad hoc interventions such as selective gating of public areas serves as examples of reactive responses to issues, and over time these interventions lead to areas that are not welcoming or inviting. The components of successful estate regeneration have been explored in more detail in *Altered Estates* (published 2016), a piece of research HTA Design undertook with Levitt Bernstein, Pollard Thomas Edwards and PRP Architects.

Employment land and mixed-use

A key objective of the Mayor's Statement is to promote economic growth; it is stated that changes from offices to residential will be resisted unless it can be justified. We consider that changes to permitted development rights from office to residential has not contributed to an increase in the quantum of affordable housing in the city, and it has resulted in the loss of much needed office space in central London locations. In some instances, units of poor housing quality have been created. The Mayor promotes mixed-use developments, and we consider that further guidance is needed on which employment uses are best suited to development which includes housing. Whilst land in active and thriving employment use should be protected, there are many examples across London of land with a protected employment designation that are very suited to mixed use development. In these instances, mixed use development proposals should not be resisted. There should be recognition that a policy emphasis on like for like reprovision of B1, B2 or B8 floorspace is not always ideal in the case of mixed use development, in particular if it could be demonstrated that an equal number of employment opportunities could be created on site. It should be recognised that employment activity goes wider than B1, B2 and B8 use classes, and that there is a need to make innovative provision for those working and living in the same place. New homes should also make provision for home working activity, which is not currently a requirement in the Housing SPG.

In conclusion, we strongly support the direction of travel set out in City for All Londoners and hope that you would consider the thoughts we have offered in our submission.

We look forward to seeing the Mayor's responses to the Consultation.

Yours sincerely,
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