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Regulars

LEADERS pages 5-8

OPINIONS pages 10-19

¡PILLO! page 25

ANDY ROGERS page 39

PLANNING PERFORMANCE pages 26-29

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REVISING LONDON'S PLAN Keeping up, Jen Peters
Planning London – limitations and weaknesses, Duncan Bowie
A commentary on the Inspectors' report, Peter Eversden. Pp 40-50

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Planning for inclusive Communities in London, the Inspectors' report on the London Plan and Design Guidance

Minutes of the London Planning and Development Forum held on Tuesday 3rd December 2019 at The Town and Country Planning Association with Koen Rutten as TCPA representative and speaker. Full minute by Drummond Robson at planninginlondon.com > LP&DF

Introductions and Apologies

Brian Waters welcomed the group who introduced themselves, and noted apologies

DISCUSSION TOPICS on the agenda:

- a] Accelerated Planning White Paper
- b] Design Guidance? Quality without overcrowding? Introduced by Gary Young Architect, Masterplanner, former Design Director at Farrells
- c] Inspector's Report on the London Plan. Sarah Bevan of London First and Duncan Bowie and Peter Eversden.
- d] Koen Rutten of TCPA to give a short talk on Planning for Inclusive Communities in London.

The discussion topics were reviewed as the result of the constrained attendance and speakers' time limitations. It was decided not to discuss item a] since this had stalled anyway because of the impending national election, to bring forward d] TCPA's Planning for Inclusive Communities in London and c] discussion of the New London Plan with b] the design guidance topic at the end. Surprisingly the very diversity of aspects of (mostly) London consid-

ered led to a stimulating and thought provoking afternoon.

Planning for Inclusive Communities in London

Koen Rutten presented material from the TCPA report *Planning for a Just City* of which he was joint author. (See <https://www.tcpa.org.uk/Handlers/Download.ashx?IDMF=a74198b6-39fe-4378-86e1-f1fd3b9dd8e>)

He promoted inclusivity in planning. He offered inclusivity through local plan analysis, case studies, sounding boards and training, and drew attention to the indicators and assessment charts in the report. The initial ones are reproduced OPPOSITE

Koen then ranged widely over how to reach the disengaged, lack of awareness about what planning actually does, and issues of transparency, honesty and trust. He took the case of Shopping at The Elephant and Castle (which is of course commercially one of the least successfully planned places in London for a range of historical reasons although now vibrant socially). He suggested there was no such thing as hard to engage groups.

This and other views were challenged in discus-

sion. Some will not engage for reasons of commercial confidence – whether they are right or not. It was suggested that many major planning schemes and ideas are complex and difficult to comprehend. It is very difficult to resolve questions of fairness in the case of compulsory purchase planning when being forced to leave home with standardised compensation which has to be offset by a future good of a greater number.

Brian Waters added that in schemes involving new housing (or new tenants) there is no-one yet to represent (probably unknown) future occupiers. Equally the real views of those whose property values are compromised by a scheme understandably will rarely give straight answers expressing their true concerns. Ron Heath spoke of his experience of unrepresentative bodies of opinion such as the case of the BNP who distorted voiced opinion in their own political interests, thereby causing the loss of a good scheme. Duncan Bowie (perhaps alluding to a very current theme!) said that elections are not a substitute for representative democracy. Class is not a planning consideration.

Judith Ryser asked how you pay people for the work they do in representing a case rather than paid officers and who do you share the consideration with and how do you compare the effort put in compared with the value received? See *Skeffington Report and consequences**.

Inspector's report on the London Plan

The draft London Plan has taken three years to produce. Its overriding concern has been housing provision.

The three planning inspectors in October 2019 recommended that the 10 year target for small sites be reduced from 245,730 to 119,350 or just under half the original target. This is set out by Borough in the table ON THE NEXT PAGE.

Indicator	Thresholds			Score (Number of local planning authorities)				Total
	Red	Amber	Green	Red	Amber	Green	Doc ^{ment} not available	
AIMS AND AMBITIONS								
Ambition: Does the Local Plan make reference to social justice, social inclusion, poverty reduction, and/or addressing social and economic inequalities as key objectives of the plan?	No reference to these terms	Yes, some reference made	Yes, clear and strong wording as key objectives	11 (31%)	16 (46%)	8 (23%)		35
Identification of inequalities: Does the Local Plan specify which inequalities it will seek to address?	No assessment of current inequalities	A few inequalities to be addressed specified	Yes, inequalities to be addressed clearly identified	15 (43%)	13 (37%)	7 (20%)		35
PLAN-MAKING PROCESS								
Impact assessment:								
Equality Impact Assessment (EqIA): Has an EqIA been carried out as part of the Local Plan?	Document not available and no reference made	Yes, referenced but difficult to locate	Yes	7 (20%)	4 (11%)	24 (69%)		35
Issues addressed: Are any negative impacts identified in the EqIA, and are measures to mitigate them included?	No	Yes, identified – no mitigation proposed	Yes, identified and mitigation clearly outlined	13 (37%)	5 (14%)	7 (20%)	10 (29%)	35
Socio-economic status: Does the EqIA assess policies according to their impact on socio-economic status/low-income groups?	No	Partial – included in indicators/considered for a few policies	Yes	13 (37%)	6 (17%)	6 (17%)	10 (29%)	35
Health Impact Assessment (HIA): Has an HIA been carried out as part of the Local Plan?	No	Yes, but does not consider health inequalities	Yes, and considers health inequalities	14 (40%)	1 (3%)	19 (54%)	1 (3%)	35
PLAN-MAKING PROCESS								
Public participation:								
Statement of Community Involvement (SCI): Is there a published, up-to-date SCI in place?	No	Yes, but older than five years	Yes, and adopted no more than five years ago	0 (0%)	8 (23%)	27 (77%)		35
Under-representation: Does the SCI make specific reference to reaching under-represented/disengaged groups?	No	Yes, mentions methods of reaching out	Yes, and includes targeted methods of reaching specific groups	6 (17%)	20 (57%)	9 (26%)		35
Collaboration with communities: Does the SCI include a commitment to collaborate/co-create/co-produce, etc. in planning with communities?	No	Yes, but weak phrasing	Yes	31 (89%)	3 (9%)	1 (3%)		35
Consultation statement: Is a consultation statement/report accessible on the council's website, outlining what consultation has taken place for the Local Plan?	No (not accessible)	Yes, but not covering all stages of consultation	Yes, covers all stages of consultations	12 (34%)	11 (31%)	10 (29%)	2 (6%) (consult'n ongoing)	35

The panel, as a consequence recommended that the proposed 10 year housing targets be reduced from 649,350 to 522,850. This is 80 per cent of the Plan Target. It is set out by Borough ON THE NEXT PAGE:

Presumably as a result of the need for some radical rethinking, changes that will be needed following the recent iteration of the NPPF and the forthcoming National Election GLA has not responded to the Inspectors' Report yet.

Duncan Bowie voiced his general concern about the preoccupation with "process, process, process – rather than anything to do with realistic outcomes". He added that this version was much, much weaker and longer than the previous one. This was echoed by general disquiet about the inadequacy of the draft London Plan as a properly considered basis for a vision for the future. (SEE Duncan's article setting out his views in detail)

Sarah Bevan has summarised the inferences and conclusions to be drawn from the Inspectors' report notably on housing and other related plan aspects.

Draft New London Plan

Inspectors' Recommendations following the EIP Summary of findings by Sarah Bevan: Programme Director, Planning and Development at London First The process to date

- Draft New London Plan published Dec 2017
- Minor Suggested Changes Aug 2018
- Examination in Public JantoMay2019
- Inspectors' report Oct 2019

Key concerns

- Detail and prescription
- Robustness of the housing land supply strategy
- Resource burdens on the boroughs
- Taking control away from the boroughs
- Potential of the detailed policies to deliver the growth envisaged
- Cumulative impact on viability and delivery

The EIP

- 34 days of hearings covering 94 matters
- London First's participation:

- 39 written statements
- 24 hearing sessions

- Borough participation
- Community participation

Inspectors report

- Published early October
- Found the Plan to be sound subject to...
 - The Mayor's Suggested Changes
 - The Mayor's Further Suggested Changes
 - Plus 53 further recommended changes

General comments

- Support the Good Growth concept (but not as policy)
- Duty to Cooperate
- Encourage the Mayor to set out a more concise spatial strategy focused on strategic outcomes when the Plan is replaced

Housing

- Housing land supply strategy is flawed
- Small sites strategy is not robust –38 per cent is too much, too soon
- Small sites target from 245k to 119k
- Overall target from 649k to 522k
- New annual target of 52k (20 per cent reduction)
- Fully support the threshold approach to affordable housing

Need for industrial land

- Rapidly changing B8 sector
- Plot ratio assumptions unrealistic
- A need for more industrial land (potentially hundreds of hectares)
- A need for sites in new locations (CAZ)

Industrial land supply

- Industrial intensification (co-location and multi-layering) is unrealistic
- Supply and demand are not aligned location-wise
- Review the borough categorisations for capacity and release
- Strengthen protection of non-designated sites

Green Belt

- Inconsistency with national policy
- All existing sources of housing land supply maximised
- Implausible to suggest the green belt is sacrosanct
- The Mayor to lead a strategic and comprehensive review as part of the next Plan review
- Joint working with LBs and WSE authorities

Design

- Long, complex, detailed and repetitious
- Design reviews
- Design-led approach to density
- Plan-led approach to tall buildings

- >>> Central Activities Zone
- Appropriate balance between strategic functions and local uses
 - Article 4 Directions to remove PD Rights

- Low cost and affordable business space
- Support the Mayor's FSCs



- Policy E2
 - range of business space in terms of type, use and size
 - applies to all B use classes
 - delete reference to rents
- Policy E3
 - Only applies in locations identified in local plans and justified by evidence

- Urban Greening
- Generally strikes the right balance
 - Industrial and warehouse development should be excluded

- Transport
- Stance on Heathrow is not justified
 - Lower cycle parking standard for older persons housing and student accommodation

- Viability
- Limitations of a strategic viability assessment
 - Plan-led viability only effective where there is an up to date local plan
 - Supported by appropriate viability evidence

- What happens next?
- Mayor's reaction to the report
 - Submission to the SoS
 - SoS intervention
 - Adoption 2020?

- Next review will not be immediate...3 years?
- London First and Sarah Bevan's Report:**

Planning Authority	Ten-year housing target for small sites	Annualised average
Islington	4,840	484
Kensington & Chelsea	1,290 1,690	169
Kingston	2,250 6,250	625
Lambeth	4,000 6,540	654
Lewisham	3,790 8,290	829
London Legacy Development Corporation	730 800	80
Merton	2,610 6,710	671
Newham	3,800 9,500	950
Old Oak Park Royal Development Corporation	60	6
Redbridge	3,680 9,380	938
Richmond	2,340 6,340	634
Southwark	6,010 8,000	800
Sutton	2,680 7,380	738
Tower Hamlets	5,280 5,660	566
Waltham Forest	3,590 8,890	889
Wandsworth	4,140 7,740	774
Westminster	5,040 5,290	529
Total	119,250 245,730	24,573

ABOVE : The three planning inspectors in October 2019 recommended that the 10 year target for small sites be reduced from 245,730 to 119,350 or just under half the original target. This is set out by Borough

The headlines and the next Plan review

You will no doubt have seen the headlines about reduced housing targets, increased demand for industrial land, and the need for a Green Belt review. In terms of housing, the Inspectors were unconvinced by the small sites strategy – i.e. the Plan's assumption that it would deliver 38 per cent of new homes on sites with a capacity of 25 units or less. They conclude that this is not realistically achievable and recommend reducing the small sites target by over 50 per cent and, consequently, the overall housing target by almost 20 per cent. This results in a new annual target of 52,285 net new homes.

This highlights the difficult choices we face as a city. In assessing the Plan against the tests of soundness, the Inspectors have had no choice but to reduce the housing targets as the small sites policy,

and the evidence underpinning it, was not effective or justified, and therefore undeliverable. However, having concluded that the Plan has maximised all sources of brownfield capacity, it means that we move ever further away from building the amount of homes we actually need, and the backlog simply keeps growing.

The most striking thing about the Inspectors' report is that it has already shifted the debate away from the current draft and onto the next review. This is particularly interesting given that the next review is likely to be far from "immediate", despite the Inspector who examined the Further Alterations to the London Plan in 2014 calling for an immediate review. And similarly, the former Secretary of State, James Brokenshire, requesting one in July 2018. The Inspectors have declined to recommend an immediate review on the basis that it may deter some bor-

Planning Authority	Ten-year housing target	Annualised average
Kensington & Chelsea	4,480 4,880	488
Kingston	9,640 13,640	1,364
Lambeth	13,350 15,890	1,589
Lewisham	16,670 21,170	2,117
London Legacy Development Corporation	21,540 21,610	2,161
Merton	9,180 13,280	1,328
Newham	32,800 38,500	3,850
Old Oak Park Royal Development Corporation	13,670	1,367
Redbridge	14,090 19,790	1,979
Richmond	4,110 8,110	811
Southwark	23,550 25,540	2,554
Sutton	4,690 9,390	939
Tower Hamlets	34,730 35,110	3,511
Waltham Forest	12,640 17,940	1,794
Wandsworth	19,500 23,100	2,310
Westminster	9,850 10,100	1,010
Total	522,850 649,350	64,935

ABOVE: The panel recommended that the proposed 10 year housing targets be reduced from 649,350 to 522,850. This is 80 per cent of the Plan Target. It is set out by Borough

oughs from updating their local plans until the review is progressed and it may encourage developers to land bank.

The explicit recommendation for a strategic review of the Green Belt – an issue we have long campaigned on – as part of the next London Plan review is clearly significant and is intrinsically linked to the panel's position on the Duty to Cooperate. The report concludes that the Duty to Cooperate did not apply to the preparation of this Draft New London Plan based on the Planning Practice Guidance that was extant at the time the Plan was prepared. However, the report notes that the National Planning Policy Framework 2019 (NPPF) does explicitly apply the Duty to Co-operate to a spatial development strategy and therefore will apply to future reviews.

The current shortfall (approx.. 20 per cent) between forecast housing need in London and the revised housing target, increases pressure on the wider South East to help meet London's housing

need and is the source of much contention with neighbouring authorities. The report notes that an effective Green Belt review should involve joint working and positive engagement with authorities around London's boundary as well as the boroughs.

Also of note, we welcome the Inspectors' recommendation that the Mayor should consider setting out a more concise spatial development strategy, focussed on strategic outcomes rather than detailed means of implementation, when the Plan is next replaced.

A smooth adoption or a bumpy road ahead?

Given the fluid nature of national politics it is hard to predict whether whoever is Secretary of State at the end of the year will intervene in the adoption of this Plan and when adoption might take place. The December general election, coupled with the timing of the Mayoral election in May, all suggest that the only prediction that can be made with any certainty is that uncertainty lies ahead and consequently fur-

ther delays are likely.

Key wins in the Inspectors' report

Turning back to the current draft Plan, it was pleasing to see several recommendations made in the report that London First campaigned on, including: The Good Growth policies in Chapter 1 should be presented as strategic objectives rather than policies which a development management decision is assessed against.

A more pragmatic approach to viability and site-specific viability assessments is recommended, acknowledging that a plan-led approach to viability will only be effective in London where there is an up to date local plan in place supported by far more detailed viability evidence than the London Plan Viability Study.

The small sites strategy presented was not robust and not deliverable, thus the targets for small sites should be reduced.

The need for industrial land (B8 uses specifically) has been significantly underestimated, partly due to market evidence presented and because the 65 per cent plot ratio assumption is unrealistic for most types of development. Many hundreds of hectares are likely to be needed, including land in and around the CAZ. Paragraph 6.4.6 of the Plan should be amended to refer to boroughs considering whether the Green Belt needs to be reviewed through their local plans in order to provide additional capacity in sustainable locations.

Acknowledgement that the co-location of industrial and residential (E7B) has limited potential to contribute to housing targets due to practicalities and viability.

Green Belt policy (G2) must be amended to ensure consistency with national policy and the Inspectors reached the "inescapable" conclusion that this Plan must include a commitment to a Green Belt review. Capacity within London is clearly insufficient to close the gap between housing need and supply and to meet the shortfall of industrial land in the medium to longer term. The review should examine all land within the Green Belt to ascertain whether, and to what extent, it meets the Green Belt purposes defined in the NPPF and take into account any potential to promote sustainable patterns of development in line with the 2019 NPPF.

On Metropolitan Open Land (MOL) specifying in G3 that proposals causing harm to MOL should be refused is inconsistent with the NPPF and should be removed. When changing MOL boundaries in exceptional circumstances, there is no justification to include the provisions requiring the quantum of MOL is not reduced and the overall value of the land is improved. These provisions should be omitted.

In terms of business space, there was agreement that E2 (low cost business space) and E3 (affordable >>>

>>> workspace), as originally drafted, were not sound in a several respects. The report endorses the Mayor's Further Suggested Changes (FSCs), which followed the debate at the hearing session and helped rectify the deficiencies.

E2 has been re-positioned to deal with the provision of a range of business space in terms of type, use and size rather than purely focus on low cost business space. E3 has been improved so that it will only apply to areas and locations identified in local plans, backed up by evidence, or where there is currently affordable workspace on site. The report recommends that E3F be deleted – this required affordable workspace in mixed-use schemes to be operational prior to any residential being occupied.

The report acknowledges that the design policies are long, complex, detailed and repetitious in places.

There is unequivocal support for removal of the density matrix and its replacement with a designed approach to residential density.

The use of an architect retention clause would be overly onerous and this should be deleted from the supporting text to D2.

The panel supports the FSCs to delete the onerous requirement to submit a management plan for residential development above certain thresholds at application stage.

Support the FSCs to SD4 that encourage the adaptation and diversification of the international shopping and leisure destinations of the West End.

For student accommodation, H17 should be more flexible to encourage nomination agreements with universities rather than require them.

On urban greening, the report concludes that the Urban Greening Factors for residential and office development appear to currently strike the right balance, but for industrial and warehouse development they would be difficult to achieve and would be liable to inhibit development. Until further evidence has been produced, B2 and B8 development should be excluded from the policy.

In respect of air quality, the report concludes that the Air Quality Positive approach is not sound, as it was not adequately defined, and so this should not be a specific policy requirement."

Peter Eversden provided a London Forum assessment of the London Plan which contains many similar points. LF also was concerned about some potential issues and implications arising, notably how to manage certain aspects of the plan's implementation.

Outstanding NLP issues and potential problems

- failure to achieve the 66,000 homes annually required by the endorsed SHMA
- failure to deliver the required number of social rent and other low cost homes
- Dependency on the Government £4.2bn grant for homes continued, without 'strings'

- Potential loss of useful content in Policy H2A OR its retention, with 'Presumption in Favour'
- Problems in identifying additional warehouse industrial land, with the competition for homes
- Slow progress is likely in densifying the suburbs acceptably and without harm
- Opportunity Area targets for jobs and homes have not been validated
- List of transport schemes in NLP Table 10.1 lacks detail compared to 2016 Plan
- Transport for London's budget seems to be inadequate for planned schemes
- Mayor and boroughs now subject to the Duty to Cooperate and 2019 NPPF
- Next Actions to manage NLP implementation
- Civic and community groups should ensure that Councils plan for development
- Character and context analyses must be performed and design codes devised
- Site Allocations, Area Action Plans, Supplementary Planning Documents and Local Development Orders are required
- Without them all, developers will decide what will be built and appeals will succeed
- Densification of the suburbs must be planned and managed by Councils.

Design Guidance? Quality without overcrowding?

Following the critique of the New London Plan



above Gary Young Architect, Masterplanner, and former Design Director at Farrells offered some more fundamental illustrated strategic guidance in achieving design quality related to density in central, inner and outer suburban London. His presentation and inferences have been reviewed and updated in the light of the associated discussion at the meeting.

His premise is that London's diverse housing needs will be met only by a combination of design approaches within the GLA area, the Home Counties including the metropolitan green belt, and the wider south east.

He asked therefore whether the New London Plan gave sufficient emphasis to high quality design in advocating good growth principles, design codes, densification of land use.

As a preface to this presentation it is worth recalling Jane Jacobs thought, written in 1961 but equally true now: "When we deal with cities we are

Proactive Placemaking: Daylight and sunlight rules should not limit new development



Paris: typical pop 26,000 per 1km2, block density 1500 hrh 300 homes/ha, district density 200 homes/ha

Proactive Placemaking: The London street & mansion block creates scale & density



Marylebone High St: pop 11,000, area 1.1km2; block density 750 hrh, 150 homes/ha; district density 100 homes/ha



The Trend to Towers Risks a Loss of Urban Street Scale

dealing with life at its most intense. Because this is so, there is a basic limitation on what can be done with cities: a city cannot be a work of art."(The Death and Life of Great American Cities: The Failure of Town Planning). JJ adds that "There must be eyes on the street, eyes belonging to those we might call the natural proprietors of the street (op cit. page 45)

Key images from a group of slides from Gary's presentation considered specific limitations and consequences imposed by rigid use of daylight and sunlight rules, notably at the urban densities found in Central London. (Jane Jacobs caveat: Densities are

too low or too high when they frustrate city diversity instead of abetting it. (Op cit p.221).

By contrast Tomorrow's Mansion Block can regain Street Presence at the same density as Contemporary Towers. To do so however requires sensitive consideration of sunlight and daylight advice, regulation and policy, rather than slavish adherence to fixed rules alone.

Parallel approaches to urban density have been investigated by HTA as presented by Riette Oosthuizen to previous LPDF meetings (see for example HTA-P-Rooftop-Development-Report 2016

<https://tinyurl.com/tdns8tc>).

Duncan Bowie was critical of the Mansion Blocks as being for the wealthier in society resulting in less diversity and the absence of affordable property.

The rules have been used and misused since their inception by Paul Littlefair of the Building Research Establishment in 1991 and revised in a second edition in 2011. They were used initially for building control guidance. They have become widely used and sometimes overused by planning authorities in policy making since, not always producing good design results.

Site Layout Planning for Daylight and Sunlight A Guide to good Practice: Second Edition Paul Littlefair BRE Trust (12-Sep-2011):

"Section 2.2 Existing Buildings
2.2.1 In designing new development or extension

Proactive Placemaking: Garden Towns could be compromised by pressure of density



Garden Towns: pop 10,000, area 7km2; block density 250 hrh, 50 homes/ha; district density 15 -20 homes/ha

to a building, it is important to safeguard the daylight to nearby buildings. A badly designed development may make adjoining properties gloomy and unattractive....

2.2.4...If the new development were 10m tall, and a typical existing ground floor window would be 1.5m above the ground, the effect on an existing building more than 3 x (10-1.5)= 23.5 m away need not be analysed.

Para 2.2.5 If the proposed development is taller or closer than this, a modified form of the procedure adopted for new buildings can be used to find out whether an existing building still needs enough sunlight. First draw a section in a plane perpendicular to each affected main window wall of the existing building (figure 14)."

Applying the BRE principles make future dense urban streets no longer possible.

Judith Ryser was doubtful about the price being paid in loss of light by lower floors of relatively narrow street architecture as found in Central London. However where this is combined with inner courtyards or pocket parks Gary suggested that this can be redressed.

Roof gardens are an alternative although they may bring exclusivity with their diversity.

Gross density - any density figure for a given area of land that includes uses not necessarily directly relevant to the figure (usually roads and other transport infrastructure)

Net density - a density figure for a given area of land that excludes land not directly related to the figure.

Weighted density - a density metric which measures the density at which the average citizen lives. It is determined by calculating the standard density of each census tract, assigning each a weight equal to its share of the total population, and then adding the segments

It is commonly asserted that higher density cities are more sustainable than low density cities.

Much urban planning theory, particularly in North America, the UK, Australia and New Zealand has been developed premised on raising urban densities, such as New Urbanism, transit-oriented development, and smart growth. This assertion, however, remains a contested or challenged one.[2]

The link between urban density and aspects of sustainability remains a contested area of planning theory.[3] Jan Gehl, prominent Danish Urban Designer and expert on sustainable urbanism, argues that low-density, dispersed cities are unsustainable as they are automobile dependent.

"What high-rise does is separate large numbers of people from the street, so we end up with a city that is detached from street life, we end up with a city that is based on enclaves and gated communities,"

"meaningful contact with ground level events is possible only from the first few floors in a multi-story building. Between the third and fourth floor, a marked decrease in the ability to have contact with the ground level can be observed. Another threshold exists between the fifth and sixth floors. Anything and anyone above the fifth floor is definitely out of touch with ground level events."

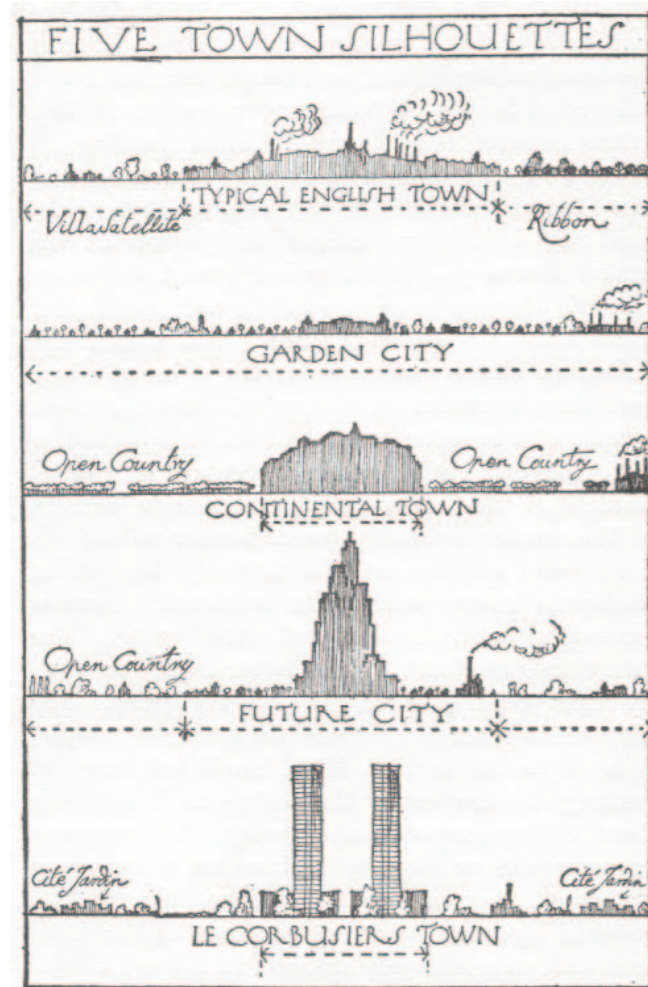
Jan Gehl – Cities for People, 2010 pp 41-43 at <https://tinyurl.com/s3gej6o>
 (See also his recent *Soft City* 2019 at <https://tinyurl.com/txbe26g>).

(See also London Plan, Density Research Lessons from Higher Density Development at <https://tinyurl.com/us6dnxa>)

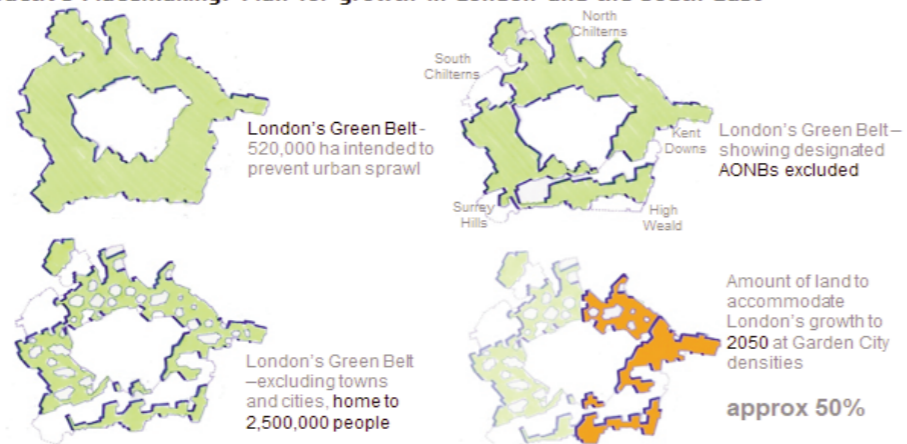
Gary also considered implications of the New London Plan Inspectors' Report arising from the concern that London was not delivering anything like the planned numbers of dwellings hoped for, whether appropriately or not. Target numbers not being met. Crude standardized reductions across all London local authorities do not reflect the different parts of London either.

Designs based on garden city principles may create high quality places. However including the 50 per cent green space garden towns achieve maximum district density of 20 homes per hectare. This would require a significant amount of land for 55,000 homes per year, the equivalent to 5 garden towns. If planned for London's Green Belt this would need 30-50 sq. kilometres per year and half of the available space in green belt could be consumed within 30 years.

BELOW: Abercrombie observed different town and city silhouettes in 1959 which arise from different patterns of growth: Sir Patrick Abercrombie Town and Country Planning • 3rd Edition 1959



Proactive Placemaking: Plan for growth in London and the South East



GROWTH OF SOUTH EAST REGION: What role for the green belt? source: Farrells

Planned Garden towns and urban extensions are typically in rural and suburban edge locations and typically have limited public transport accessibility. These locations in the early stages, are particularly vulnerable to undesired impacts on surroundings, e.g. increased traffic congestion, demand on services and economic viability dictating a lower density of housing to satisfy the market.

London's Green belt will not provide a single answer to the required housing with garden towns with densities typically of 50 per/ha. Garden town and suburban densities would consume a very large area of green belt to meet anticipated demand, which is neither possible nor an answer to the quality v overcrowding debate.

Therefore planners must seek appropriate alternative places to supply housing to meet demand. Opportunity areas in the south east including the Cambridge Oxford Arc could accommodate both employment and housing, but require significant investment in new transport infrastructure, which is likely to be many years into the future.

Reflecting the Inspectors' London Plan Review which requires a rethink of London's relationship with its own and Home Counties Metropolitan Green Belt, as set out by Sarah Bevan above. Gary calculates that if all London's growth to 2050 would require half the Green Belt at Garden City densities which are about 1/6th of Central London densities.

AS CPRE pointed out in 2010 as well as including substantial urban areas, even the green areas of Green Belt is used in different ways.

It is also clear that the Home Counties themselves are looking

for Green Belt space to meet pressures seen as their own, For example the home country district of Hertsmere is currently assessing about a third of their total green belt area which people are formally seeking to build houses on, all assuming that the necessary associated infrastructure is provided by someone else.

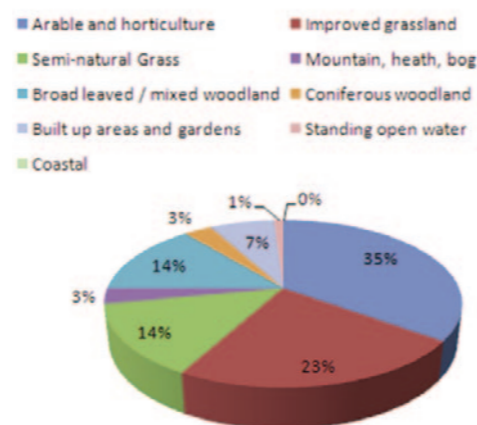
Climate related pressures are the appropriate opportunity to review conventional garden city models with what Gary describes as the Market Garden City, (which is suggested for a future separate PiL article).

Final Summary Statement:

Gary Young also summarised his presentation after the meeting by saying "Towers are not the answer, garden towns are ok but are low density. Locations near with transport hubs can achieve required density of over 100 per ha. 6-7 storey mansion blocks only in urban areas and ... 3-4 storey terraces with innovative ideas such as back to back roof gardens resolve daylight and privacy in suburban contexts."

Next Meeting Annual Planning Update seminar hosted by Dentons and administered by the Cambridge University Land Society on 18th of March 1.30 for 2 pm. Book at www.culandsoc.com

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Designing with light and air for sustainability and wellbeing

The authors introduce the book and Gary Young reviews it

Healthy Homes: Designing with Light and Air for Sustainability and Wellbeing by Nick Baker and Koen Steemers RIBA Books
Hardcover £35.00 Amazon
Available from RIBA Bookshops or at architecture.com/riba-books



Authors Nick Baker, course tutor at the AA and visiting lecturer at the Cambridge school of architecture and Koen Steemers, professor of sustainable design at the Cambridge school of architecture

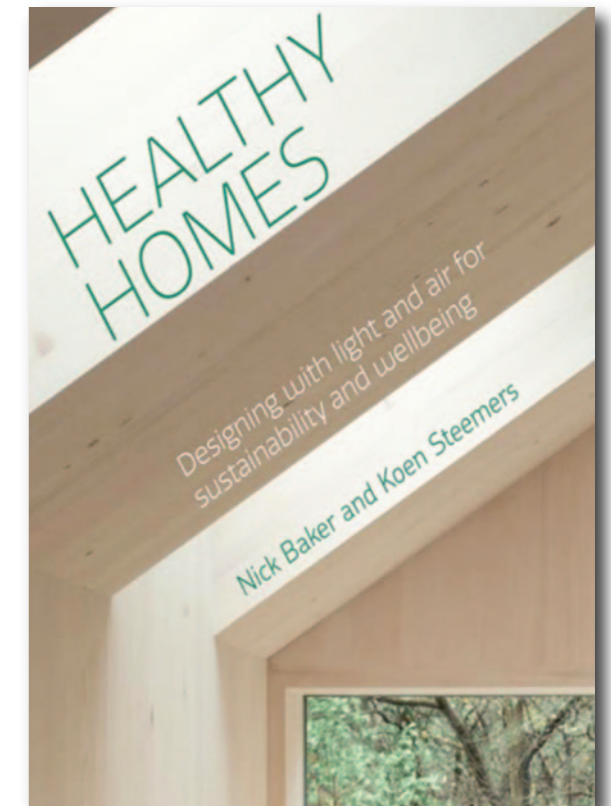
We are becoming accustomed to the criterion of “evidence – based decisions” about drug and medical treatments, and in that context, few would argue with the logic. In writing this book, we set out to base recommendations for healthy design on a similar basis – to draw upon the extensive literature in the fields of environmental health, well-being and psychology. However, we immediately found that it is not straightforward, because unlike clinical drug trials, it is unusual for these to be focussed on specific issues, in our case architectural design.

For example, whilst there might be statistically sound correlations between contact with nature and children’s educational development, contact with nature is not defined in such a way that is immediately translatable to an architectural solution. Is it the view through the window, the size of the window, the presence of a balcony, the distance from the nearest park? A more prosaic example - there is much evidence that cleaning products and other household chemicals contain dangerous and even carcinogenic substances. But does this really warrant a secure air-tight store ventilated direct to outside? Will the reduction of indoor air pollution be significant to the health of the occupants?

Thus, there has had to be an element of personal judgement and belief. In our preface we have made reference to the Hippocratic Oath of “do no harm”, and this has been a good starting point. There is a long and continuing history of buildings being harmful to their occupants – cold, damp, mould-spore ridden, dark, gloomy and depressing in winter, then overheated in summer; noisy from neighbours, road traffic and aircraft, with dangerous off-gassing from materials, not to mention risk from fire. So, the successful application of the Oath would in itself be a worthwhile objective. A claim that building design can go beyond this, creating an environment that is positively good for you, (like a walk in the countryside), is of course relative to a perceived norm, for which we have no definition.

Another issue we had to grapple with is that of conflicting influences. The large window giving fine views of distant natural landscape, bathing the room in healthy daylight, could also be a source of traffic noise, and/or solar gain, unwanted in summer, and maybe an uncomfortable loss of visual privacy. The overriding result could be dependent upon the spatial context, or even the occupants; for example, the needs and tolerances of a retired couple being very different from that of a young family.

How to weight the relative importance of these conflicting influences, we have left unresolved. We have not proposed a points system, where we add up scores and decide whether the advantages of an openable window onto a sunny but noisy and



polluted garden outweigh the disadvantages. Instead, we have advocated the principle of adaptive opportunity. This term, which was initially applied to thermal comfort, is the observation that a person’s perceived and actual opportunity to make changes in his/her environment in order to reduce thermal discomfort, results in their being more satisfied than predicted from simple thermal comfort models. However, we believe that this principle applies to other physical and possibly psychological parameters. For example, we have all witnessed people taking coffee seated at a table on a busy street, experiencing conditions of noise and pollution that would be unacceptable in almost any other situation. The explanation is they sit there voluntarily and have the opportunity to move inside. They make the evaluation of the conflicting factors there and then – it is not pre-determined.

Of all animal species, humans have always shown amazing adaptability; so successful has this strategy been in our evolution that we have become the dominant species many times over – a bloom, many would say a plague – on this planet. It is ironic that it is in recent times that due to engineering possibilities, and notions of optimised or “perfect” environmental solutions, the opportunity for adaptive behaviour in the built environment has been steadily eroded. We believe designers should consciously address the environmental conflicts, as exemplified >>>

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>>> above, by providing intuitive building controls – e.g. shading, openable windows, accessible heating controls etc., and anticipating and testing plausible adaptive avenues that the occupant can take. It is not so much the provision of the “correct” or “optimum” healthy environment, but more one that is “good enough” and allows the occupant to make healthy adaptive choices.

The structure of the book implicitly reflects these ideas. Part One is a critical review of the wide-ranging literature on environmental health, psychology and well-being, and on the emerging design guidance and codes of practice relating to this. Part Two is concerned with the physical manifestation of the building on its site, and its response to local and global conditions. As well as the familiar aspects of heat light and sound,

Healthy Homes reviewed by Gary Young

A much needed appraisal of the current state of design for wellbeing, this book covers the broad range of issues affecting living environments and impacts on psychological and physical health. The writing is accessible, adopting a sustainability audit approach which will be useful for students and designers in urban design and housing. The authors refer to the available evidence and acknowledge the need for the evidence base to be further developed.

The benefits of improved daylight, ventilation and sanitation have a crucial history and legacy in influencing housing design, notably pioneered by Florence Nightingale. A casual observation of the title and browse through this book, particularly accompanied by the excellent images of domestic interiors of roof-lit low-rise housing, could suggest that good daylight and sunlight alone provide the answer to healthy homes. The sections on daylight sunlight and ventilation are supported by established technical data and therefore appear the most prescriptive guidelines, whereas other sections which are equally important, yet with less evidence available are more speculative. Importantly, however, in the overall text it is clear that daylight, sunlight and ventilation do not alone provide the contents or conclusions of the authors, which are more nuanced.

Healthy homes in cities with higher urban densities will need housing solutions for medium rise compact urban blocks with street scale and public realm. In this context daylight is one factor in many. A rush by developers to build high rise supported by ideologies which are incorrectly justified by need for light and air should be avoided and careful heed taken from errors in the past. Urban design must include healthcare challenges and lifestyle factors such as poor diet, insufficient exercise, loneliness and social integration which all relate very strongly to compact neighbourhood and street designs, balancing proximity and day-

topics such as access to nature, circadian rhythm, and air quality are dealt with here in an analytical way. Finally, in Part 3, we have attempted to illustrate the synthesis of these principles by means of 6 scenarios. These describe both new and refurbishment projects for residential buildings including single detached homes, refurbishment of high-rise 1960s tower, new student accommodation and a care home.

Even during the time-span of preparing this book, renewed concern has gathered pace on the old issues of carbon emissions and global warming. It seems that the human race faces an increasingly uncertain future at an ever-decreasing time scale. Guidance on the provision of healthy housing against the constraint of massive reductions in energy and resource use and increasing population density, has a vital role to play. ■

light criteria. SEE: Jan Gehl, *Cities for People* 2010 pp 41-43.

Changes in climate will also have a significant impact on homes. The book is mostly referenced with examples from UK & Northern Europe with relatively benign climates. Future uncertainties in climate will need more consideration, whether increased solar radiation and sky brightness requiring increased protection and shade, or increased precipitation, dull skies and protection from extreme climate events. These factors are included in the book, however without evidence available these influences are identified more speculatively, with less tangible design recommendations.

The authors acknowledge the reality of design for healthy living is complex, considering such a wide range of factors they conclude that at best current design solutions should acknowledge concepts of “safe territory” or “good enough design”. The book references scientific data and emphasises with each topic how evidence can be used to create principles for good design solutions, which are, however, often contradictory and require extensive weighing up. The last section of the book includes design scenarios which illustrate just how varied each design response will need to be, creating almost unique solutions. Architecture and urban design relies on an “adaptive opportunity” approach, based on data and feedback from occupiers over time, unlike product design which can be based on tested evidence and refined before use. This appropriate approach, which the authors refer to as “nudge architecture”, requires an open mind and lessons learned attitude, which builds on occupier feedback with scientific and sociological based evidence.

The book is an excellent reference and appropriate for an uncertain future where urbanisation and consideration of climate change requires continual design refinements to achieve healthy homes. ■

An excellent reference appropriate for an uncertain future says Gary Young

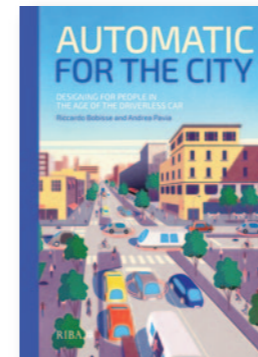
Gary Young, architect has collaborated with Sir Terry Farrell for 40 years on award winning, mixed use developments. Gary as director of Place 54 Architects has completed residential, retail and industrial masterplans



Driverless cars and the (near) future of London and Los Angeles

Authors Riccardo Bobisse and Andrea Pavia introduce *Automatic for the City*

RIBA Books £45



Riccardo Bobisse is a practising urbanist and Andrea Pavia, AICP is an urban designer

Are our cities ready for the age of the driverless car? Riccardo Bobisse and Andrea Pavia have explored the potential implications of driverless cars on the built environment in the new RIBA title *Automatic for the City*

The metaphor of the city as human body has endured since the Renaissance, sustained by master designers and theorists, to give sense and structure to the city's different parts, their functions and interrelations. Using this metaphor, we can understand the city's mobility system like the human body's skeleton, providing support, movement, and regulation to the other parts, like muscles and organs. As technologies for urban mobility evolve, so does the body.

With the revolution of the private automobile after World War I, London and Los Angeles witnessed a rapid and unprecedented transformation that is still underway. The body mutated beyond recognition. Today we are on the verge of a similar revolution. Connected & Autonomous Vehicles (CAVs) linked through big data to a shared economy will become, according to the latest industry predictions, a reality in major urban areas within the next 10-15 years. Is the body going to mutate once again beyond recognition? And, if so, what is this going to look like? How will this mutation unfold? Will the metaphor altogether shift from the analogy to the human body to the analogy of the complexity of

the human brain?

One of the much-presaged benefits of the CAVs revolution will be more efficient traffic operations leading to increased carrying-capacity of existing road infrastructure and less parking requirements, with the potential to reallocate road and parking space away from vehicles to other uses. With the ever-increasing levels of traffic congestion that urban areas are experiencing under the pressure of population growth, there will be a temptation to use the space 'gained' for more vehicles. In fact, over the last two decades the overwhelming majorities of cities have made modest progresses in addressing modernist mistakes of car-led city planning, in dismantling barriers that were created by making traffic efficiency the driving force, and in de-segregating uses. Even where private car trips have actually decreased, these have been replaced with more trips for deliveries and ride-hailing SEE <https://tinyurl.com/y7rlq73x>.

Still today only suggesting of removing or re-configuring urban highways (or at least some of them) is, as a minimum, controversial despite successful examples in many European and US cities. Healthy Streets and Liveable Neighbourhood (UK), Complete Streets and Vision zero (US) efforts have recently received fiery push-backs because of this car-led planning culture (see for instance recent cases in Tower Hamlets1. Even Millennials' chang >>>

