



London Plan EIP Report Roundtable : Urban Design London thoughts

Small sites

We discussed the reasons for the inspectors recommendations regarding small sites, what the GLA might do next and what all this might mean for boroughs.

There was general understanding of the difficult position the GLA have been in regarding the need to show how housing targets could be met. A wish not to alter the green belt, combined with existing housing delivery assumptions for large brownfield sites, meant London's suburbs became the focus for identifying additional capacity. There was sympathy in the room for this approach, and a view that it could potentially help balance out the pressures growth and change can bring across all parts of the city. But there was also concern that the structure and nature of suburbs had not been fully understood and taken into account.

We discussed two sides to the small sites policy. First, SHLAA numbers, % delivery assumptions and housing targets. Some boroughs were buoyed by the panel's acceptance of their criticisms of the small sites policy numbers, but for some problems with the numbers were seen as a facet of the current national planning system rather than a reflection on London and its specific needs. There was talk about whether the GLA might compromise on their growth assumption figures, maybe opting for .8% for small sites. But in general it was not felt that tweaking the policy would tackle the main question – should London take its own growth? And if so where should it go?



Beyond the numbers it was felt that the thrust of the small sites policy, to promoting use of such land, and help update suburbs, still stood and was useful. However questions were asked about the definition used for a small site. With a general presumption in favour of sustainable development, attendees asked if having a separate definition amplified problems relating to providing a mix of uses, affordable homes, social infrastructure and other growth requirements from this type of development. One outer London borough mentioned a potential 65% deficit in CIL money for infrastructure and felt that the small sites approach did not help meet this. The concept of change to improve an area (from NPPF), or as more often expressed – there being ‘sweeties’ for local people on the back of development did not seem adequately addressed within the current small sites approach.

In terms of what the Mayor might do next, we discussed what an alternative small sites approach might look like. People suggested that greater focus on town centers and high streets and a more nuanced approach to locational differences might help. As could developing small sites typologies that included local employment spaces. There was a feeling that local character and heritage should be taken into account, and the positive aspects of suburban living such as having gardens and trees better recognized. In essence that a one size fits all approach was not the best way of planning.

There was also discussion around the basic structure of many suburbs built for the car, and the long term challenges this presents for promoting active travel and so saving space and allowing these areas to densify. It was not felt that we have an adequate solution for this yet.



We talked about whether the Mayor would be likely to look to the green belt and neighbouring areas as a way of meeting housing targets. Some felt that this would be difficult to do politically (see section on green belt below) while others felt that agreeing to lower housing numbers would also be difficult politically. Responsibility could potentially be pushed back to central government, showing that the housing target led system is not working well and that this will be seen in other parts of the country too.

Boroughs are currently working on SPDs, town centre plans, design briefs etc. to support delivery on small sites, and understand the need for pro-active planning. But they feel they are currently working in limbo, with few opportunities for conversations, collective development of ideas and joint working available.

Design policies

We did not have a particularly long discussion around the new design policies. We noted that they were generally supported by the inspectors, and although they required additional resource, participants felt that more use of Design Review Panels and Public Practice placements were already helping.

We did however discuss inspector comments on characterization studies. Some participants agreed that old style studies talked about what areas are like now rather than how they could be in the future needed updating. If boroughs are to successfully front load work, they need fresh approaches tailored to today's challenges.



Delegates discussed problems associated with the NPPF plan making viability requirements. They felt that it could be difficult to square the more nuanced, location sensitive design led approaches set out in the London Plan with the need to test the viability of an areas development delivery targets in a local plan as set out nationally. They would like more help understanding how to do this.

Green belt review

We spent a considerable amount of time discussing the green belt. Participants understood the political sensitivities of even talking about changing it, and there were marked differences of opinion on its usefulness. Some felt that it should not change at all, some were concerned that the London Plan wording reduced flexibility for boroughs to review areas if needed, while others thought that a full strategic review of London's green belt lead by the Mayor but also involving surrounding SE green belt authorities as suggested by the panel would be useful. Without a GLA coordinated full review people thought that unconnected small changes here and there were likely but that these would not be that helpful when looking at the big picture.

We talked through the green belt's 5 current objectives as set out in national policy and questioned whether these were the best start for a strategic review. For example should areas be removed because they will cause least harm to green belt purposes, or should they be chosen because they will be of most benefit for housing or other uses? Greater emphasis on positive benefits for Londoners was called for, for example public access, biodiversity, food growing,



resilience and placemaking. But it was felt that national policy would have to be updated for these to be taken more seriously.

The difficulties of providing sustainable development in the green belt were discussed. It seemed that in some places green belt areas were being used to provide social infrastructure such as provision of playing fields, or distribution centres to support housing and coordinated deliveries for built up areas. This was seen as slightly different from building homes directly on green belt land.

Overall it felt like the start of what may be a very long and complex conversation about the green belt, both within and outside London's jurisdiction. But whether the GLA, central Government or anyone else would have the appetite for such a potentially politically charged debate was uncertain.

UDL will continue to discuss these and other issues with our members. If there is a topic you would like us to look at please let us know

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