



New London Architecture response to ‘[Good Quality Homes for all Londoners](#)’ consultation - 15 January 2021

This consultation response is made by New London Architecture (NLA) the independent centre for London’s built environment, which brings together professionals, politicians and the public to shape a better city. Our membership includes over 600 organisations across the public, private and charitable sectors, and represents a broad base of built environment professionals, from the development community, to local authorities, planners, architects and others.

This response has been led by the NLA Expert Panel on Housing.

Module A – Assessing site capacity

Section 2 – Site analysis using capacity factors

1.

To what extent do you agree or disagree with the capacity factors covered in Section 2.2?

1. Strongly agree
2. Somewhat agree
3. Neither agree or disagree
4. Somewhat disagree
5. Strongly disagree
6. Don't know

2.

Please tell us if you have any comments on the capacity factors and/or if you have any changes you would like to suggest and why?

Whilst we appreciate that, with the disappearance of the Density Matrix from the new London Plan, there needs to be an agreed methodology to determine the appropriate density and capacity of sites across the city for new housing and therefore realistic delivery targets for each borough, we believe Module A does not go far enough in assisting in this process. In its current form, we feel that it could, provide false confidence in the capacity of plots to deliver a certain quantum of development and be difficult for Local Authorities to usefully employ.

For example site capacity issues appear to have been narrowly defined. There needs to be more discussion around below ground considerations (e.g. tube lines), and deliverability, particularly around the issue of land ownership.

There appears to be a bottom up approach, and we wonder if there are better alternatives. This is particularly important given the GLA’s strategic role, and given the historic challenges of sufficient housing delivery across London.

An approach that works back from the end product could be more effective. This would not negate the need to consider infrastructure requirements (etc) but rather than these components driving development output, consideration should be given to development output driving infrastructure (etc) output and requirements.

It may also be the case that site capacity outputs need to be range-based, rather than pre-judging what might transpire to be under- or over-development.

Section 3 – Use of residential building types



4.

Are there other common housing typologies that meet housing standards (Module C) that should be included as part of determining site capacities?

1. Yes
2. No
3. Don't know

5.

If you answered yes, please describe the housing typology that should be included. Please include the following parameters in your description:

- Typical characteristics
- Heights
- Access information
- Any limitations to this building type

We fear that in planning for all eventualities, and that by being overly prescriptive the document will in fact limit development. We address this in greater detail in question 18 below.

7.

When choosing combinations of residential types, are there any other factors that boroughs should consider?

There seems to be a focus on residential only schemes, but more attention should be paid towards mixed use, particularly given discussions around 15-minute cities. The document should also address the impacts of covid.

Section 4 – Testing site capacity and using SketchUp

9.

To what extent is the information on how to use the indicative site capacity calculator clear and easy to use?

1. Very easy
2. Somewhat easy
3. Neither easy or difficult
4. Somewhat difficult
5. Very difficult
6. Don't know

11.

Are there any technical barriers to you using the SketchUp tool to determine site capacities?

1. Yes
2. No
3. Don't know

12.

If you answered yes, please describe what these technical barriers are below.

We fear SketchUp has limited function. Given the GLA's strategic role, and recognising the growth of PlanTech, we would suggest a much more ambitious approach, with the GLA co-ordinating with the boroughs to ensure that the approach is universal and joined-up across London. Several of the engineering firms have developed software that addresses site capacity whilst taking into account extensive inputs and we also suggest consideration be given to Vu City. Such an approach would really push the good growth agenda, and ensure that the toolkit is fit-for-purpose in an evermore digital world.

13.

The site typologies can be used with software other than SketchUp.



Are there alternative tools/ online platforms for testing site capacity that should be highlighted in addition to, or instead of, SketchUp?

- Vu City
- Ramboll's toolkit
- PRISM, potentially blended with Vu-City
- Further investigation is needed of the opportunities afforded within the PlanTech sector

Overview of Module A

14.

To what extent do you think that Module A is clear and easy to use?

1. Very easy
2. Somewhat easy
3. Neither easy or difficult
4. **Somewhat difficult**
5. Very difficult
6. Don't know

15.

If you think changes are needed to Module A to make it clearer and easier to use, please provide more detail.

Please see response to Q18 below.

16.

To what extent do you agree or disagree that Module A provides a comprehensive framework to optimise site capacity for those involved in housing delivery?

1. Strongly agree
2. Somewhat agree
3. Neither agree or disagree
4. Somewhat disagree
5. **Strongly disagree**
6. Don't know

18.

Do you have any further comments to make on Module A?

If the principle user is intended to be borough policy officers, then we assume that Module A is intended to guide plan-making which have 15 year timescales, space must be made for encouraging ambition and / or new ways of thinking.

While we accept that there is a role for guidance and standards as a back stop for change and quality, the 46 questions for (principally) borough policy officers to consider, alongside other considerations, seems too lengthy.

Considerable thought needs to be given as to how to condense the module into something much more succinct, which also incorporates sufficient flexibility so as to remain useful and relevant over a plan period. The guidance should be able to adapt to future changes in lifestyles, events (e.g. Covid impacts) or socio-economic trends. More critically it should not stymie both development and innovation.

This document offers the GLA an opportunity to deliver something strategic, concise and much more radical in its approach than currently drafted, so as to really drive good growth and quality place-making and city-building. We would welcome the opportunity to discuss this in more detail.

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This response was made by the NLA Expert Panel on Housing:

Response led by:

Adunni Adams, Head of Delivery, Catalyst Housing
Fergus Evans, Project Director, Estate Development Programme, Grosvenor
Caroline Harper, Chief Planner, London Borough of Barking & Dagenham / BeFirst
Dipa Joshi, Partner, Fletcher Priest Architects

Response reviewed by:

Barbara Brownlee, Director of Housing, City of Westminster
Melissa Dowler, Director, Bell Phillips Architects
Russ Edwards, Head of Product, Residential, Lendlease
Sarah Hiscutt, Partner, Knight Frank
Alexandra Jezeph, Senior Property Development Manager, Transport for London
John Lewis, Managing Director, Modular Housing, AECOM
Heather Macey, Associate, John McAslan + Partners
Jo McCafferty, Director, Levitt Bernstein (Chair)
James Pargeter, Senior Advisor, Global Apartment Advisors
Attzaz Rashid, Head of Design, Barratt London
Linda Thiel, Director of London Studio, White Arkitekter

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Module B – Small sites and design codes

Section 3 – Identifying opportunities for small housing development

1. Are there any other considerations for street-facing or backland conditions that should be included in Sections 3.3 and 3.4 of Module B?

1. Yes
2. No
3. Don't know

2. If you answered yes, please describe what these other considerations are below.

Section 3.3 and 3.4 consider the typical spatial scenarios associated with street-facing or backland conditions. We consider the guidance to be relatively clear at a high level, offering ideas around frontage line, front to front distances, building heights, and rear building line projection in respect of 'frontages'. Regarding 'backland conditions' we welcome the spectrum of commentary on daylight, sunlight, privacy, building heights, green cover and roof forms.

The diagrams about green space work really well and offer a clear demonstration of different options – It would be also good to see more ambitious sustainability or urban greening targets which offer benefit to developments and their neighbours.

Whilst the guidance is helpful for residential dwellings, which is the primary focus of the draft SPG, we consider that there is an opportunity for the design code to respond to other uses too in order to help to create the successful balanced communities of the future. We note the following:



- The wording and the typologies outline a typical response for domestic properties. However in a more diverse interpretation of small sites placemaking, could 'frontages' be broadened to consider ideas and designs relating to other uses, such as retail, commercial or other non-residential uses, and how these may be best integrated into the streetscape?
- Similarly given obvious current pressures on the retail sector in particular, we may see more existing retail below residential being repositioned into other non-residential uses (eg small offices, community or care facilities). There is an opportunity for this document to provide guidance on how to respond to these non-residential interventions in the streetscape.
- We note that several typologies were considered for traditional backland formations (e.g. behind existing terraces or a detached house); perhaps greater consideration could be given to spaces found in residential areas which do not sit within a typical streetscape. Examples include clusters of garages, light-industrial land, and sites in and around transport nodes, including railway arches.

Overview of Module B

3.

To what extent do you agree or disagree that Module B is clear and easy to use?

1. Very easy
2. Somewhat easy
3. Neither easy or difficult
4. Somewhat difficult
5. Very difficult
6. Don't know

4.

If you think changes are needed to make Module B clearer and easier to use, please provide more detail.

Whilst overall, we consider Module B to be well structured, and note that the images in particular are clear and easy to interpret, we have a comment regarding its purpose and scope. Firstly, we question such prescriptive coding for small sites, where bespoke, and inventive / unusual design responses are often necessary to fully optimise the capacity and quality of housing that a small site can deliver. Could such guidance be more effective and appropriate for substantial sites? Secondly, the use of the term 'code' in Module B is misleading, as it is drafted as a series of approaches to different small site conditions. We would recommend the word 'guidance or guide' is used instead.

With respect to Module B as it is currently drafted, our commentary below focuses on clarifying the intention of the document and what outcomes it is seeking to drive. Our observations include:

- We would welcome clarification of the context / lens within which this document could be read. To explain this further, we believe that the document could be more explicit in driving design outcomes that respond to issues and challenges that a great number of communities are currently facing. These may include:
 - Supporting greater sustainability – from a social and economic perspective as well as environmental.
 - Responding appropriately to the live/work trends which have been accentuated and accelerated during the Covid pandemic environment, in particular a greater emphasis on working from home for at least a proportion of working time.
 - Advocating for better amenities and shared spaces for sites and communities, There is a missed opportunity here for considering the potential tension between privacy and community spaces, which should be addressed and can bring benefits if undertaken well.



- We note the document offers substantive, constructive advice for single dwelling properties, however there is little representation of the types of schemes envisaged at the larger end of the small sites' spectrum (8-10 homes).
- We also note that there appear to be some cross-references to the new London Plan. Whilst these documents should compliment and support each other we recommend that where possible, guidance should not be duplicated.
- We also observe that since publishing this draft, central Government have issued updated planning guidance (e.g. PD for an 'extra storey') which appears to now conflict with some of the advice within this document. This should be clarified to avoid misunderstanding.
- On a practical note, in the case of Figure B.9, it is not fully clear what this image is seeking to demonstrate or advocate.
- The document clearly advocates expansion of existing properties where this could allow the creation of an additional dwelling. In the context of live/work changes accelerated by Covid-19 and the permitted development changes already referenced, consideration should be given to the value in creating larger homes and how the design code could support positive design outcomes associated with this (both in cases where planning permission is and is not required). As background, there is growing evidence that the events of 2020 are changing what many people want (e.g. more space / extra room, and private outside space), which won't yet be truly reflected in any formal evidence base.
- Design codes are no doubt intended to assist the planning process, by providing clear parameters for designers and builders to bring forward applications which are 'compliant first time'. This should also help to head off potential objections from local neighbours and stakeholders – although presumably these views could feed into an earlier local design code consultation stage instead.

5.

To what extent do you agree or disagree that Module B provides a comprehensive framework to assess the quality of small sites schemes and to prepare design codes for small sites development?

1. Strongly agree
2. Somewhat agree
3. Neither agree or disagree
4. **Somewhat disagree**
5. Strongly disagree
6. Don't know

6.

If you think changes are needed to Module B to ensure that it provides a comprehensive framework to assess the quality of small sites schemes and to prepare design codes for small sites development, please provide further detail.

Overall, we welcome the rationale to articulate design codes and to provide guidance in approaching small sites to drive positive development outcomes. We would advocate that innovation and flexibility in the application of these design codes is proactively encouraged as part of this process. Specific points include:

- We believe it could be confusing and difficult in practice to achieve a balance between (a) specific guidance representing "prescription" and (b) encouraging "innovation necessary to successfully realise good design" (section 2.1). We feel there is a danger of pastiche and the prevention of fresh character being introduced to a location.
- Small sites inherently lend themselves to very particular design solutions. They are often subject to significant objection and pushback by neighbours, so anything smacking of standardisation seems unlikely to succeed.



- Given small sites generally have a unique spatial context, and therefore lend themselves to very particular design responses, we consider the guidance provided in Module B (mainly in terms of the text) to be too prescriptive. We suggest that, as drafted, the guidance is at risk of limiting innovative and imaginative design responses, in favour of adhering to a predefined uniformity of generalised street scenes. As an example, the document specifies that C1 ‘upper levels must be set back from the street’ and C4.2 ‘there must be no projecting balconies’. It is not clear that these requirements will be the ‘right’ or best response in every setting.
- Street facing housing has been described only in its current cellular form, which doesn’t offer many architectural solutions. If the ultimate aim is to create new London homes we feel the scope should be more ambitious – for example, what about the concept of combining multiple existing properties?
- The architectural diagrams generally represent traditional terraced housing, but there are other typologies of street facing buildings. Diversity of architectural style needs more representation – for example, why must roofs be assumed to be pitched?
- Additionally, we consider that the potential for a landmark building (or any other design response that falls outside the scope of a typical design code), may only be achievable / viable if design exceptions such as greater height, bulk, massing or the use of unusual materials, could be accommodated.
- Similarly, in the case of housing mix / use mix, there may be circumstances where relaxation in interpretation of policy (which is often directed at driving outcomes from larger sites) in favour of high-quality innovative, site-specific solutions may be preferable. Small sites by definition are more constrained and may struggle to meet all the expectations / needs that would typically be sought from a larger housing scheme.
- Lastly, we also observe that many of the recent NLA award winners and nominees have shown creativity and innovation in ways which do not necessarily conform to existing streetscapes / design codes. (See for example the shortlist nominated for the 2020 ‘Dwelling’ category at: nla.london/awards/new-london-awards-2020-shortlist)

7.

Do you have any further comments to make on Module B?

Overview

We welcome the broad ambition behind Module B, within the wider suite of the consultation draft documentation. Small sites have the potential to deliver many of the additional new homes that Londoners need, and guidance to allow this to be forthcoming in an efficient manner whilst ensuring good quality in terms of design and other planning considerations. Such efficiency is likely to be particularly helpful to SME developers, who may not have the resources or specialist experience of larger organisations in taking their proposals through potentially complex planning processes.

Having said this, we have a range of comments relating to the guidance within Module B as currently drafted. Whilst no single document could perhaps cover all possibilities, we feel that there are some questions still to be considered regarding some of the assumptions behind the guidance. We have tried to clearly set these out below, and would be happy to discuss any of them further in the post-consultation phase if it would be beneficial to clarify anything through discussion.

One of the broad areas of concern we have is the extent to which the trends in both living and working patterns are likely to change for Londoners and local communities in the wake of the Covid-19 pandemic. It can be argued that such trends and societal changes were underway in any event, and have simply been accelerated by the effects of 2020 (since the consultation documents and indeed the new London Plan were drafted). Either way, we feel that such effects should be fully considered for the benefit of London and Londoners – housing (and any other property types) should always respond to the range of people’s preferences and choices in order to be successful into the future.



In summary, we share the overall objectives of this draft SPG but strongly believe it can be further improved before it becomes finalised.

On a practical level, the module appears to ignore the cost and complexity of creating design guides. London Boroughs are not at their most robust following Covid 19 interventions and consequent drop in income, and design guides take on average a year to complete. This concern is that they will be bottom of most borough's priorities for the foreseeable future.

It seems that this document seeks to provide advice to support acceleration of small site design development and delivery. Given this, it is surprising that there is no reference to supporting, or design advice to aid, specific methods of small site delivery such as self-build, custom build and modern methods of construction (MMC). Self-build and custom-build naturally focus on small sites, and particularly in the case of custom-build, design codes are utilised to create and reinforce identity and placemaking between units that are all part of a custom-build scheme. It would be beneficial to articulate how the guidance provided in the Good Quality Homes SPG document could be utilised or interpreted to support the best outcomes from these approaches.

Similarly, if Modern Methods of Construction are to be embraced by the industry, they should be recognised as having significant benefits (potentially reducing costs, improving construction quality and timeframes, thereby minimising neighbourhood disruption etc) for small sites. Whilst the MMC market may need some time to mature before it becomes mainstream, it would be helpful to consider how design decisions could be supported by MMC and vice versa.

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Module C – Housing design standards

1.

Do any of the standards in Module C need to change?

1. Yes
2. No
3. Don't know

2.

If you answered yes, please provide detail on how the standard(s) need to be changed and the reason for this change?

The key aspects of the proposed standards that require change include:

Sustainability:

The NLA Expert Panel for Housing feels that the Module C document could do more to build new design standards and guidance based around the sustainability agenda. Sustainability in general terms, and carbon and the circular economy specifically, are presented in Module C as 'bolt-on' aspects of design rather than the fundamental starting point for new housing, which is considered a significant barrier to widespread adoption of more sustainable design and delivery practices. This document represents an opportunity for London to place itself at the forefront of sustainable urban living practices and should be revised to present a more aspirational approach to delivering sustainable homes.

The standards could be further enhanced with specific guidance (and case studies) that support the approaches of retrofit and adaption of existing building stock.

Illustration:

The key principles should be illustrated in Module C to better articulate what the GLA considers best practice compliance with the standards, and to eliminate ambiguity and/or incorrect interpretation of the content. This requirement is particularly true where there may be apparent conflicts in the guidance – for example, the requirement to deliver 100 per cent dual aspect homes with a recommendation of maximum eight homes per core – such an arrangement has limited layout options and is difficult to reconcile with ambitions to provide natural light into communal circulation spaces.

High Density:

The guidance does not acknowledge any additional/separate content for high-density and high-rise development, which is felt to be a weakness. Similarly, the case studies referenced, and included in Module D, do not include sufficient exemplary high-density and high-rise project examples that sufficiently meet the proposed standards. *Please refer to the separate Module D survey response for additional detail.*

Post Pandemic Context:

Whilst it is accepted that the drafting of the Module C content is likely to have pre-dated the current pandemic and its impact on the built environment and society at large, it feels like a significant weakness when reviewed in Q4 of 2020. For example, there is very little reference to the need to cater for more flexible working patterns, and the increased understanding of the importance of access to green space.

Further specific suggestions, referenced to the Module C numbering, are included in the response to Question 6, below.

3.

To what extent do you think that Module C is clear and easy to use?

1. Very easy
2. Somewhat easy
3. Neither easy or difficult



4. Somewhat difficult
5. Very difficult
6. Don't know

4.

If you think changes are needed to make Module C clearer and easier to use, please provide more detail.

The NLA Expert Panel for Housing, would like to see the following changes incorporated into Module C to make it clearer and easier to use:

Repetition:

The current structure includes significant repetition. For example – section 2 describes the Standards, with section 3 providing guidance on each standard – and in most cases repeating the entirety of the standard first. A single, streamlined format that clearly separates the standards from the guidance – but includes them adjacent to each other for reference purposes would be preferable.

Illustration:

Module C lacks illustration. The key principles should be illustrated to better articulate what the GLA considers best practice compliance with the standards, and to eliminate ambiguity and/or incorrect interpretation of the content.

Minimum dwelling size table

Section C4.1.1 is a verbatim copy of the table included in NDSS guidance. This table could be updated to provide significantly more benefit to document users with the inclusion of the estimated spatial impact of the measures outlined in the guidance section for C4.1.1 – for example, a separate kitchen and/or utility room for three-bedroom dwellings and larger homes. It is important for the GLA to acknowledge the spatial impact of such measures on the minimum sizes of dwellings, otherwise there is a risk that designers will endeavour to incorporate such additional functions within the same minimum size which will result in a compromise of residential quality.

References to Exceptions

Further clarity and/or guidance is required on what may be considered an exception/exceptional circumstances, where this term is included in the standards. It is considered that the bar should be set suitably high to avoid default approaches. It would perhaps be useful if the case studies included in Appendix D could be annotated with the exceptions/exceptional circumstances associated with those projects where they fail to meet the specific standards this term is relevant to.

5.

To what extent do you agree or disagree that Module C provides a comprehensive set of housing standards in order to ensure high quality design can be assessed and achieved?

1. Strongly agree
2. Agree
3. Agree but needs changing
4. Disagree
5. Strongly disagree
6. Don't know

6.

If you think changes are needed to ensure that Module C provides a comprehensive set of housing standards, please provide further information and explain why.

In addition to the general points made in response to the other survey questions, the NLA Expert Panel for Housing, would like to see the following issues addressed in the document in order to provide an improved comprehensive set of housing standards:



C1.2.1 – Further guidance and more varied examples required to support this standard.

C1.3 Land use mix – General support for the intent of this standard and associated guidance but further acknowledgement of the passage of time following the initial publication of the draft guidance – guidance to consider SoS Direction (issued in March 2020), which has changed the emphasis in relation to no net loss. Update to The Mayor's Industrial Intensification and Co-Location Study: Design and Delivery Testing 2018 to highlight progress/updated case studies given the complexity associated with industrial co-located uses.

C2.1.2 – General support for the intent of this standard and associated guidance, however there are concerns that the requirement to provide M4(3) homes with a range of aspects and views (i.e. at different locations within the floorplate and at different floor levels) – as described in the guidance to the standard, will have a disproportionate effect on viability. M4(3) dwellings are required to benefit from an increased internal area which means that distributing single apartments around a block, as opposed to providing a 'stack' of M4(3) apartments, is problematic from a building efficiency and servicing perspective and will add significant cost - particularly on smaller development projects.

C2.3.1 – This standard would benefit from much greater explanation and guidance on the GLA expectations.

C2.3.2 – General support for the intent of this standard and associated guidance, and the need for early, meaningful community engagement is fully endorsed, however the use of the term, 'early design stage' is ambiguous and would benefit from further clarity. For example, this standard could reference expectations (illustrated through case studies) for the type of consultation expected at each RIBA work stage, described by relative size and complexity of project. The standard should recognise the inherent difference between a complex estate regeneration for example, and a suburban infill project, and should be meaningful, proportionate and bespoke to the project and community.

C3.1.2 – There is concern that, firstly, the wording of this standard currently could be interpreted as effectively endorsing the development of proposals that include neither natural daylight to communal circulation, or corridor widths exceeding 1500mm. Secondly, given that these potential justifications are noted in the standard, it would seem logical to also note occupancy levels as a further justification, given that this is referenced in the associated guidance section. Thirdly, the provision of eight homes per floor, with 100 per cent dual aspect homes, is challenging to provide, without internalising the circulation core or use of external galleried access.

C3.4.1 – Maximum vehicular parking provisions are supported however it would be useful to describe acceptable justification for reducing provision below these standards to support applications with lower parking ratios, including car free development. Further guidance on approaches to promoting reduced car use and parking requirements in outer London to be explored and incorporated should also be included. In addition, there is an opportunity to set out desired approaches to distribution of parking and delivery spaces, rather than merely maximum quantum, with use of illustration and precedents.

C4.1.1 – Section C4.1.1 includes a verbatim copy of the table included in NDSS guidance. It would be beneficial for the table to be updated to include the estimated spatial impact of the measures outlined in the guidance section for C4.1.1 – for example, a separate kitchen and/or utility room for three bedroom dwellings and larger homes. It is important for the GLA to acknowledge the spatial impact of such measures on the minimum sizes of dwellings, otherwise there is a risk that designers will endeavour to incorporate such additional functions within the same minimum size which will result in a compromise of residential quality.

C4.1.4 – Flexibility in dwelling types is supported. Greater clarity and ambition should be provided as to the type of flexibility that needs to be demonstrated – Is it merely furniture layouts, or a more fundamental re-organisation? It should also be acknowledged that flexibility will be limited within smaller dwellings based on the minimum dwelling sizes and furniture.

Supporting illustrations and detailed case studies to demonstrate the thinking here would be beneficial.

Building services layouts are invariably organised around planning stage furniture layouts, so the standard



should also clarify whether building services installations should equally be designed to afford greater flexibility (whilst being cognisant of the additional cost associated with such a requirement).

C5.2.1 – The aspiration to provide dual aspect to all new homes is supported, however it is also acknowledged that such a requirement will have a significant negative impact on project viability.

The concern with such a blanket rule is that, due to viability issues, a large number of projects will fall into the 'exception' category undermining the aspiration behind this standard. A more measured approach to improving the number of homes that benefit from dual aspect may be to outline acceptable justification for the provision of single aspect homes (in the same way as the standards do for exceeding eight dwellings per core), which could exceed the current environmental criteria which all new homes are expected to meet.

C5.3 – While ADF is often the standard referred to by planning policy, it directly conflicts with energy efficient design and overheating. It also does not take into account the quality of light and therefore is a blunt method of verifying levels of daylight in new homes. This often leads to excess glazing areas that need to be reduced to prevent overheating, especially in London. Other unintended consequences include the unnecessary partitioning of dual aspect homes to allow a 'pass' in both sides of the home and the artificial enlargement of windows on single aspect homes to compensate for deep plan rooms.

The use of VSC over and above a 'room-based' method such as ADF does not allow for the consideration of room depth. This means large windows on single aspect deep plan rooms will be permitted.

It needs to be acknowledged that where there is a conflict between daylight, overheating, energy efficiency and noise ingress, one will need to be compromised and therefore the target relaxed. We would suggest this should be the daylight calculation given its crude calculation method.

The following statement regarding reviewing daylight in a home needs some further clarification: "Inevitably, any window or room under a balcony will receive much lower daylight and sunlight levels, although the adjacent balcony space will typically have excellent levels of daylight and sunlight amenity. Given this, the Mayor encourages boroughs to allow the daylight levels on the balcony to contribute to the ADF of the adjacent living space." The levels of light on a balcony would more than compensate for the rest of the room. Leading to bright balconies with no incentive to increase daylight in rooms.

Given the amount of guidance required to implement then subsequently relax the BRE guidelines it begs the question as to why the calculation method is used at all? This is a sign that using ADF and VSC is a less than perfect system in dense urban areas.

Daylight is an incredibly important part of a home which is currently not protected or enhanced by the standards suggested. It would be far more useful to give qualitative guidance around window sizes and room depths in relation to neighbouring buildings.

C5.4 – Internal noise conditions – This should also take into account the noise from mechanical ventilation systems inside the home. A poorly specified, sized, designed or installed ventilation system can cause excess internal noise, especially when operating at high air volumes to meet overheating requirements. Limits should be set on internal noise from mechanical systems.

C5.5 – We question the guidance on 'Thermal envelope performance and energy use' as this could go much further in providing design guidance to clients and design teams on the impact of their design decisions.

It suggests that air tightness, thermal bridging and better u-values are the way to reduce space heating demand. While this is the case, there are also more fundamental issues that need to be addressed, such as orientation of homes, the form factor of the building and glazing ratios. These must be considered first. Increased u-values and reduced thermal bridging cannot compensate for a poorly designed building.

While increased insulation does lead to heat gains being retained, the fault should instead be placed on poor window design, orientation and lack of shading which allow heat gain to enter in the first instance. Post-



occupancy studies have demonstrated that a well-insulated building has the ability to keep heat out in summer as much as it can keep heat in in winter – but only where combined with environmental façade and building design.

Insulation of building services distribution in corridors should also be twinned with better design for reduced pipework lengths and adequate ventilation of corridors to disperse heat gain.

The design of the building has a huge impact on the energy consumption for space heating. This is not adequately captured by this guidance nor the 10 per cent reduction in emissions required at the 'Be Lean' stage of the energy hierarchy. The Housing SPG can assist in plugging this gap if relevant design advice is given. There are number of publicly accessible documents that could be referred to here.

The case study for this section 'Signal Townhouses' is a particularly inappropriate example of energy efficient homes. A connection to a district heat network does not compensate for the large form factor, fixed glazing and need for mechanical ventilation. Alternative suggestions include: Agar Grove in Camden and the Passivhaus townhouses of South Gardens in Elephant and Castle.

C6.1 – Further guidance could be provided for designing buildings to maximise PV area. This includes consideration of parapet heights and orientation of pitched roofs. In addition, the guidance should be cognisant of the potential conflict with biodiversity objectives and on-site greening ambitions.

Reference to "Development proposals should be future-proofed to achieve zero carbon emissions on-site by 2050" requires further clarification – i.e: is it operational carbon and regulated energy or does it incorporate embodied carbon?

Whole life-cycle carbon emission calculations are proposed (C6.1.2) – more guidance required on which methodology is expected to be followed for this requirement.

The case studies in this section should also be re-visited. More aspirational energy efficient examples exist in London.

C7.1 – The general view of the NLA Expert Panel on Housing is that much more detail needs to be added here. For example, what are the criteria which define whether retaining and refurbishing a building is "practical" or not? Similarly, there is an encouragement towards design interventions to reduce overheating (preferred over mechanical cooling) but there is no expectation on a specific climate change scenario to follow and no definition of a point in time when it will be deemed that natural ways of cooling might no longer be sufficient.

7.

Do you have any further comments to make on Module C?

Undoubtedly 2010 LHDG was much needed and significantly raised the standard of new build housing in London, it was forward thinking for its time, had clarity, ambition and visibly raised the quality of the poorest residential development in the city. However this SPG needs to move the quality, resilience and ambition of new housing forward to be relevant and have the same vital impact in the next ten years, and therefore requires significant review, as we have outlined, with this in mind. However, it is generally acknowledged that, one of the unintended consequences of the publication was to generate a new London 'vernacular' of architecture. It is felt that Module C in its current draft – given a broadly similar approach to 'prescription' and 'description' risks doing the same.

It is telling that there is no single case study included in Appendix D that could be identified as being exemplary across all of the standards (and provides a mainstream housing offer), which suggests that in order to fully comply with Module C a quite specific design response is likely to be necessary.

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This response was made by the NLA Expert Panel on Housing:

**Response led by:**

Russ Edwards, Head of Product, Residential, Lendlease
Melissa Dowler, Director, Bell Phillips Architects
Sarah Hiscutt, Partner, Knight Frank
Jo McCafferty, Director, Levitt Bernstein (Chair)

Response reviewed by:

Adunni Adams, Head of Delivery, Catalyst Housing
Barbara Brownlee, Director of Housing, City of Westminster
Fergus Evans, Project Director, Estate Development Programme, Grosvenor
Caroline Harper, Chief Planner, London Borough of Barking & Dagenham / BeFirst
Alexandra Jezeph, Senior Property Development Manager, Transport for London
Dipa Joshi, Partner, Fletcher Priest Architects
John Lewis, Managing Director, Modular Housing, AECOM
Heather Macey, Associate, John McAslan + Partners
James Pargeter, Senior Advisor, Global Apartment Advisors
Attaz Rashid, Head of Design, Barratt London
Linda Thiel, Director of London Studio, White Arkitekter

Module D – Case Studies

1.

To what extent do you agree or disagree that the case studies provided are useful?

1. Strongly agree
2. Somewhat agree
3. Neither agree or disagree
4. Somewhat disagree
5. Strongly disagree
6. Don't know

2.

Can you recommend other case studies that would be useful to add, and if possible, provide the same information as set out in the other case studies?

We believe more examples of complex, higher density, large scale development of a variety of tenures are needed to make Module D useful, relevant and enduring. It is often in schemes of this nature where the real challenge lies to ensure quality. The schemes chosen also need to be much more environmentally ambitious and the project information needs to highlight which aspects are exemplary – ie. why each scheme has been selected as a case study project. There need to be significantly more interior photographs throughout, illustrating the quality of homes which have been delivered, ideally with user feedback. The typology-based structure is also constraining and often misleading, as the higher density schemes include a mixture of typologies, working together. We would suggest a density based structure may be more useful and appropriate. In addition we believe case studies need not just be drawn from London boroughs.

Aldgate Place, E1 – Barratt – NLA Tall Buildings 2020 <https://www.alliesandmorrison.com/projects/aldgate-place>

St Andrews, Bromley-by-Bow – Barratt <https://www.glennhowells.co.uk/project/archive-test/>



10 George St, Canary Wharf – Vertus <https://group.canarywharf.com/media/press-releases/vertus-debuts-with-10-george-street-the-first-build-to-rent-development-in-canary-wharf-071119/>

Blackhorse Mills, Walthamstow - Legal & General Investment Management
<http://assael.co.uk/portfolio/list/blackhorse-mills/>

Victory Plaza, East Village - Get Living <https://www.getliving.com/our-neighbourhoods/east-village/#>

Union Wharf Greenwich – Essential Living (volumetric modular construction)
<http://assael.co.uk/portfolio/list/union-wharf/>

Material Store – HUB <https://hubgroup.co.uk/projects/material-store/>

Rehearsal rooms – HUB <https://hubgroup.co.uk/projects/rehearsal-rooms/>

Pontoon Dock – GLA, Grainger & Linkcity <http://assael.co.uk/portfolio/list/pontoon-dock/>

Wembley Park – Quintain living <https://www.quintain.co.uk/wembley-park>

Goldsmith Street, Norwich – Mikhail Riches & Cathy Hawley <http://www.mikhailriches.com/project/goldsmith-street/>

Sutherland Road, Waltham Forest – Levitt Bernstein <https://www.levittbernstein.co.uk/project-stories/sutherland-road/>

Hazelhurst Court – Levitt Bernstein <https://www.levittbernstein.co.uk/portfolio/hazelhurst/>

Fact sheets are available for some of these which will enable case studies to be developed.

There are other schemes included in the NLA awards lists that should be included, as well as the housing design awards.

Shortlist from the NLA Awards 2020 category Housing - <https://nla.london/awards/new-london-awards-2020-shortlist>

101 on Cleveland, Westminster by Assael Architecture
95 Peckham Road, Southwark by Peter Barber Architects
Belle Vue, Camden by Morris+Company
Blackfriars Circus, Southwark by Maccreanor Lavington
Kings Crescent Estate Phases 3&4, Hackney by Karakusevic Carson Architects
North Street, Barking by Peter Barber Architects
Queen's Yard, Hackney Wick, Tower Hamlets by Jestico + Whiles and Stockwool
Rochester Way, Greenwich by Peter Barber Architects
The Officers' House, Greenwich by Allford Hall Monaghan Morris
The Reach, Greenwich by Pitman Tozer Architects Ltd
The Rye Apartments, Southwark by Tikari Works
Wilmer Place, Hackney by Belsize Architects Ltd
Monier Road, Tower Hamlets by Pitman Tozer Architects Ltd
Hand Axe Yard, Camden by Material Architects

3.

Do you have any further comments to make on Module D?

The guidance purports to be for Landowners, Developers, Architects & Wider Design Teams, Planners, Decision Makers. This is a very wide net, and we would argue that the detail in here is not sufficient to be meaningful for those at the professional end of the spectrum.



1. Exemplars should be expanded to be more representative of homes being developed in London particularly in the higher density range of developments;
 - Too focussed on lower density, small to medium scale, bespoke projects, rather than complex, mixed tenure, higher density, large scale development, which is often where the real challenge lies to ensure quality. A much broader spectrum of case studies in this regard is necessary for this module to be useful and ensuring its relevance.
 - Add refurbishment exemplars
 - Add build over exemplars
2. Exemplar presentation/illustration format is too standard – illustrations don't generally showcase the specific exemplar point well enough. More specific technical data to back up the point being made would be helpful.
3. The detail provided should also be proportional to the scale of the development. Presently it is a series of case studies condensed into a template of two pages.
4. The scheme metrics would benefit from a description of the densities achieved, and the ratio of built footprint:public realm.
5. We would like to know 'warts and all' those areas where the exemplar scheme fail to achieve standards so that LA's are more comfortable in making balanced planning judgements.
6. Is the build cost data helpful? And the rates are wildly different and do not make much sense when compared to each other. Are these costs baselined and up to date enough to be of value? We would suggest that these are misleading, and of very little value, without a much greater level of detail behind them.
7. There should be more focus on internal quality of living space achieved – provide bigger scale more legible floor plans and internal photos.
8. There should be a much greater importance placed on the contribution that public realm and private amenity bring to the experience of living in any development. We suggest this should be highlighted across all of the examples – perhaps even in each quality paragraph. We know outdoor space, for biodiversity, retreat and play is vital – so this needs to be included.
9. It is very evident that the standard typologies for utilisation in assessing site capacity becoming increasingly less relevant the smaller in scale the development becomes, where bespoke solutions have to be found. This is evidenced in the lack of any resemblance to those typologies in Module D. Perhaps there needs to be a recognition of this in the earlier modules.
10. Tower definition as ten storey and above could have unintended consequences – society views towers differently and schemes could be stigmatised if labelled as towers when they are not. We believe the term tower is also somewhat contextual. Ten storeys would not be considered a tower in the context of the Docklands or Elephant and Castle for example, and we feel the definition should be much looser.
11. Should the guide have a post Covid-19 addendum highlighting things to be considered to make homes work better in a work more from home world.
12. Should the guide cover placemaking in more depth as this is hugely important in creating great places to live?
13. Energy and carbon – would it be possible to add in the facts box how the schemes perform against Part L . As in x% reduction on Part L.... etc or if any benchmark data can be provided on carbon footprint and energy use?
14. Are there key quality aspects which would be the most important to achieve at the different scales of typologies?

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