London Forum comment on Shaping Neighborhoods: Character and Context draft SPG

The London Forum of Amenity and Civic Societies is a registered charity established in 1988 to support and network over 100 community groups in the capital and to represent their views to the GLA and to Government.

There is general failure in the draft SPG to make the link to neighbourhood planning, the role of neighbourhood forums (which may be constituted, even if they do not produce an neighbourhood plan) and engaging people not only in the process but also that communities might be the commissioners. Appendix 2, however, is a useful resource - it is referred to in para 5.28, but nowhere else?

The key test of the document is whether it provides a clear enough "road map" to enable communities to be intelligent clients, if not actually able to do it themselves. Do the process diagrams hang together as "route map"? Does there need to be a route map for neighbourhood groups/local communities?

Those sections/paragraphs which directly address the community-led approach need to be highlighted. (e.g. paras 5.16-19) Or should there be a popular version that is a do-it-yourself kit for communities as an input to neighbourhood planning and/or to their participation in the preparation by boroughs of Local Plan content?

The non-technical summary might be the basis for that but it omits some useful guidance.

There is very little about barriers (e.g. para 5.38) which define communities - whether rivers, railways, roads, open spaces, large public buildings, cemeteries, etc.

There is very little about activities and uses that shape the character of an area, such as pubs, schools, hotels, meeting places, places of worship, etc, especially in the "Cultural, social and economic elements of character" section (page 57). For example, the battle to save local pubs is about their importance as a meeting place (cf NPPF paras 69/70), but their contribution as an activity to the character of the area both as a use and, most particularly, as an activity. This is absolutely vital - it is the loss of diversity as well as history, as everything succumbs to change to housing, creating increasingly homogeneous areas. Site survey (para 5.44) could emphasise this.

There is very little mention of how areas change over time, particularly the conversion of houses to flats and bedsits and then their reconversion to housing, and the impact of changing tenure, gentrification and the impact of rising prices and the impact of property development and, most recently, the loss of population where newly-completed property remains empty.

Conversion of offices to flats will have an impact also.

Detailed Comments

Foreword:

Para 1:   Line 11: Add "that is" after "much"

Para 3:   The two issues are "engaging with places" and "engaging with communities" - mention the former.

Para 4:   The words 'rather its' in the fourth line of the right hand column should be replaced with 'rather it is'. 'Following this structure approach' in the middle of that column should be 'Following this structured approach'.

1.   Introduction:

Para 1.2:   Lines 14/15: Delete "bring time benefits to" and add "save time in"

Para 1.3:   Lines 17: Delete "urban city region" and add "urban area" - delete all references to "city" or "city region" - this is about neighbourhoods!
This para. should emphasise that most of London Plan Chapter 7 policies should be considered in making decisions about the suitability of a development to its surroundings and setting.

Para 1.4:   Line 2: Delete "supplementary to" and add "which supplement"
Replace "these policies" by "those policies" and change the second "under" to "within"

Para 1.5   Lines 1/2: Delete "in the process of becoming" and add "evolving"

Para 1.6:   First bullet, line 2: After "London" add "neighbourhoods" - this is about neighbourhoods in London not London as a whole.

Para 1.7   Commence the last bullet point in the right hand column and add ", working with their borough on Development Plan Documents, Supplementary Planning Documents or Area Action Plans, seeking local listing, developing Conservation Area Management Plans and engagement with developers in pre-application consultancy."

Page 11:   Yellow Box: Define "Place"

2.   Policy Context:

Page 14:   No figure number - should be Figure 2.1
Identify the SPG set in the Shaping Neighbourhoods Portfolio

Para 2.1:   Lines 2 and 8: Change "below" to "above"

Para 2.5:   After 2.5 insert paragraph on "sustainable communities" drawing on NPPF section 8

Para 2.9:   Put Policy 7.4 Local Character in a box.

Para 2.10:   Replace "There are a number..." with "There is a number..."
Reference should be made also to London Plan policies 7.17. 7.18, 7.19 and 7.24.

Para 2.11:   Cross refer to Figure 2.1
B: Line 9: delete "around some aspects of" insert "about"

Para 2.13   Add to 2.13, "It provides guidance also on the application of the London Plan's policy for housing density and its related Table 3.2."

Para 2.15   The words 'will be key' appear too far through a long sentence.
Lines 12/13: Delete "whether Londonwide or within a local travel-to-work area"
  - we are talking about neighbourhoods/localities!

Para 2.17:   Line 3: After "policies" add "and proposals".

3. Benefits of Understanding Character and Context and Key Principles

Para 3.3:   Line 21: Delete of organic evolution" and insert "which has developed organically"
             Lines 26 and 27: what is the meaning of the words "not fully cohesive or uniform" and "intensive distribution" ?

Para 3.4:   Line 3: What is a "community entity"? A person or group of people?
             Line 6: What is a "process of understanding"? A discussion or debate?

Para 3.6:   7th bullet: Line 1: change "suitable" to "appropriate" - as in "appropriate density ranges" in the London Plan Policy 3.4.
             8th bullet: Line 2: Change "siting" to "appropriateness" - the word 'siting' prejudges whether tall buildings are appropriate at all.

Page 25:   Substitute photograph for photomontage even though it is not quite complete.
             The Farringdon railway station has a wide open, cavernous frontage which lacks human scale.

Para 3.10:   Line 2: Character and "city wide" is almost an oxymoron, but is inappropriate when dealing with neighbourhoods. The largest area referred to in this paragraph is a "regeneration area". Para 3.11 talks about "the extent of a place" - the references need to be realistic - we are talking about neighbourhoods.

Para 3.13:   Line 7: "services or benefits" - is this really experiences, such as familiarity, safety and sense of belonging. See Para 4.2 3rd bullet.
             Next sentence sounds contrived - is it really about historic interest and associations?

Para 3.16:   This should have reference to the importance of views through the boundary of a place, in both directions.

Para 3.18:   Line 3 change "phases" to "periods" and Line 4 change "evolution" to "activities".
             Line 13: Delete "management" - means nothing to most readers.

4. An Overview of the process of understanding the Character and Context of a Place

Para 4.6:   2nd Bullet: Line 2: Delete reference to "London-wide" -
                             it is inappropriate when we are dealing with
                             neighbourhoods. Borough-wide is ambitious enough!

5. Scoping and Survey

Para 5.3:   Growth and Infrastructure Act 2013 - update text.
             Change words to "local authorities to request only information from..."

Para 5.5:   The issue of diversity of uses as opposed to homogeneity needs to be addressed.
             As housing takes over from other uses, areas can lose the vitality and diversity - especially of commercial uses, such as shops, pubs, restaurants, post offices, petrol stations, builders' yards, etc.
             Indeed, there is very little emphasis in the whole document on diversity of uses and activity that gives a neighbourhood its life.

Para 5.7: The last sentence needs some explanation - **you can't just drop in such a method without explaining it.** Why not show the product of a regression analysis to help readers visualise it.

Para 5.8: Line 2: Should "definite" be "defined"?
Line 10: after "extent of" add "an"

Table 5.1:

Neighbourhood Plans: Say neighbourhood "can be" rather than "are" difficult to define. The approach is relevant also to the preparation of DPDs, SPGs and AAPs for a Local Plan. Add those.

Tall buildings strategies: This approach presumes that tall buildings are appropriate - not defining the most appropriate or least inappropriate siting of them. Few areas will want to accommodate tall buildings - they should be able to reject them as harmful to the character of their area. The community should have a significant input to the consideration of the appropriateness of tall buildings.
Attention should be drawn to section F of London Plan Policy 7.7:
"Boroughs should work with the Mayor to consider which
areas are appropriate, sensitive or inappropriate for tall and
large buildings and identify them in their Local Development
Frameworks *[now 'Local Plans']*. These areas should be
consistent with the criteria of this policy and the place shaping
and heritage policies of this Plan."

Density strategies: Parameters Line 9 should read as "existing".
Guidance on extent: What is "digital modelling", what would it be used for and how would it be used?
The words in the left hand box could be more explicit as:-
"Identify opportunities and constraints for change to existing densities"

Visual Impact Assessments: Not clear how these would define boundaries. See also para 5.13 - tall buildings can be within or outside the area. How does this affect the extent of the area?

On page 43 there is a footnote or end note symbol for Landscape and Visual Impact Assessment but there is no associated detail at the foot of the page. The same applies for the symbol on Natural England in 5.15 and others. The end notes are on page 95 and there should be a reminder of that at the foot of any page with such a reference.

Para 5.13: After "Conservation Area Appraisals" add "and Management Plans"

Para 5.22: Add "or flooding" after "climate change".

Para 5.24: Add ", application of Article 4 Direction, identified heritage at risk or safeguarded views" after "listed buildings"

Para 5:27: In the middle, extra words may be useful, as follows. "Access to places of interest, leisure, health, learning and transport should be taken into consideration."
This relates to Physical Character.

Para 5.34: Third bullet, line 2: what is "structural vegetation"?

Page 56:   2   Access and Circulation:
                                  This should include a PTAL map to show relative
                                  accessibility to public transport. (See also para 5.37)

                      3/4/5: Building heights are generally more important than tall
                                  buildings to the character of an area.

                      6.   Access to public open space is a key character element for   na
                                  area - especially a deficiency of access to local open
                                  space. (See also para 5.37)

Para 5.44:   Put "are" instead of "is" in the last sentence.
                      It may be useful to add "Local existing issues that should be corrected, such as
                      street clutter and barriers to ease of movement, should be identified."

Para 5.49:   Last sentence needs expanding to cover the local factors that influence
                      consideration of density and capacity, including accessibility to and capacity of
                      public transport, access to a town centre, etc.
                      See Density Matrix: London Plan Table 3.2.

Para 5.58:   Add "peacefulness," after "security,"

Chapter six - Analysis and presentation

Box 6.1 shows an attractive area ruined by off-street parking for which there is barely room and which may be on impermeable surfaces, adding to storm flows overloading sewers. A better Georgian townhouse area might have been selected for this illustration, as on page 84 or attention drawn to the way the area is harmed.

The illustrations of the Vauxhall Nine Elms Battersea Opportunity Area Planning Framework Digital Testing of Proposed Built Form captioned 'Exploring the effect of the built form of the proposed master plan and surrounding context in terms of heritage and views' and the accompanying illustration captioned 'Testing the effect of the proposed cluster on the LVM views' offers a crucial example worthy of a detailed case study. None appears.

The relationship of illustrations, charts and case studies to text are often uncertain. The purpose of several of the illustrated examples of places and character remain unclear. What do we make of the cage-like balconies confronting the elegant and architecturally confident facade of the historic warehouse in the otherwise pleasant Hoxton example?

Para 6.36:   There are redundant words at the bottom of the left hand column of
                      "Mapping and describing typologies" which should be removed as
                      they head the next section in the right hand column.

On page 82, the words "enables the reader" seem incomplete.

Appendix 1 - The definition of typography could be added.

Further comments

It may be useful to have phrases such as "facilitating such changes as might be desirable from time to time", instead of the repetition of the change mantra.

It is a pity that conservation of the historic fabric continues lazily to be seen in terms of culinary cliché (aspic) and that 'change' is, despite caveats, given a positive connotation as a defining feature of London's character. Whole libraries are devoted to the subject of the loss of "ancient, durable public buildings that are strong and useful" in Hawksmoor's words. Many other European cities show that retention of the historical built environment need not impede development which happens regardless. Although this is implied, it could usefully be asserted.

The purpose of the non-technical summary of the SPG is not clear. It lacks some of the help that the full document provides.

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