

The **London Forum** of
Amenity and Civic Societies



working to protect and improve the quality of life in London

London Forum *Insights*

Issue 4, April 2021

Welcome to another heavyweight issue of London Forum *Insights*, due in part to the stream of announcements and consultations from the Ministry of Housing, Communities and Local Government (MHCLG)*. We report on the Zoom meeting with members following the **publication of the draft National Model Design Code (NMDC)** and proposed changes to the National Planning Policy Framework (NPPF), and summarise London Forum's response to the consultation. We also report on the Government's unwelcome (at least for London Forum members) decision not to allow online planning committee meetings to continue, followed almost immediately by steps to negate this decision. Even this odd turn of events was trumped by the announcement that the Government is pressing ahead with its widely deplored intention to introduce a Permitted Development Right (PDR) for the conversion of almost all most business and commercial buildings to residential.

The **upcoming mayoral election** is the subject of three contributions. London Forum's new President, Ben Derbyshire presents a wish list for the next mayoral term on behalf of the Built Environment professions, Andrew Bosi looks at the electoral process by which the winner will emerge, and Daniel Instone compares candidates' pronouncements for improving the environment.

We carry a contributed article from Gordon Massey, Barnet Residents Association on **suburban densification** and the threat to the suburbs arising from the Small Sites policy in the recently adopted London Plan – responses welcome! A planned Zoom meeting to explore this topic had to be postponed as the GLA team are in purdah ahead of the mayoral election.

Other topics include an introduction to the **Commonplace** digital platform for community engagement, a new Civic Voice initiative on **Statements of Community Involvement**, and our regular **Round the Societies** feature.

Readers' attention is drawn to the [News/Updates](#) section of the London Forum website, where regular updates are posted on matters of importance to London Forum members

* The abbreviations MHCLG, NPPF, NMDC and PDR explained in the first paragraph will be used throughout this newsletter without further explanation.

Large turnout for Design Codes event

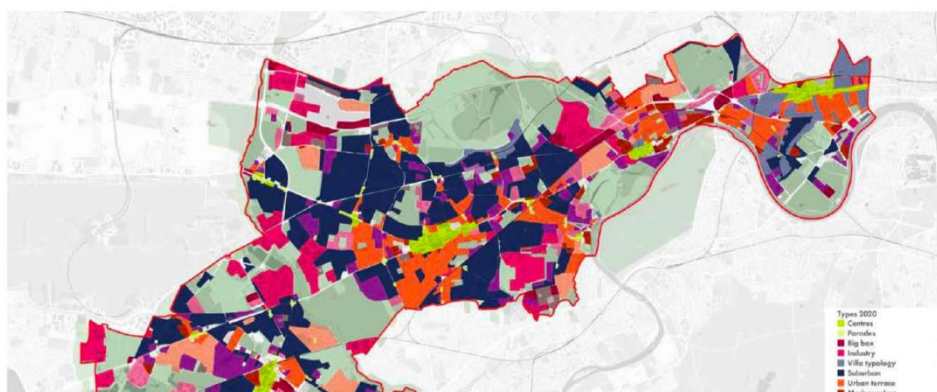
The well-attended Zoom event on 4th March was about Design Codes, with distinguished speakers from Urban Design London (UDL), MHCLG, and the boroughs of Brent and Hounslow. A fuller note of the event is [here](#) on the Forum's website, but here are some key points.

Design Codes are envisaged in the recently-published London Plan. They will encourage pro-active and collaborative planning, hopefully leading to well-designed and beautiful places. Good character appraisal is fundamental; it should be practical rather than historical in focus, looking at the present and the envisioned future. Design is more than, for instance, the position of windows but is rather how a building fits in with its place. UDL will be running Code Schools.

The concept of Beauty (i.e. good design) is being introduced into the NPPF. The Government are consulting on a draft National Model Design Code to provide detailed guidance on the production of design codes, guides and policies to promote successful design; they are also setting up an 'Office for Place' which will help authorities and communities move forward. The regime will be implemented first in pilot areas; with all its complexities London may be something of a special case.

Brent will concentrate on areas where full large-scale redevelopment is envisaged, not individual plots in established areas; It would be difficult to build consensus about the future of an area and any consensus might be for bland development, rather than something more adventurous, that might become a conservation area in the future. Hounslow's aim is to have a borough-wide design code, split down successively into area-specific; typological; and site-specific codes; all should have community input, and be interactive.

Typology Based Codes



The presentations were followed by a lively question and answer session, including the following:-

Q. How can the unpopularity of densification, essential to meet housing targets, be tackled?

A. There should be real engagement about the major trade-offs involved; more people bring more economic activity and keep shops and facilities viable.

Q. How do design codes relate to conservation areas and neighbourhood planning?

A. Good conservation area management plans will be very like design codes. The design code toolkit is appropriate for neighbourhood forums as for local planning authorities. The standard of the work done by some consultants for neighbourhood forums will have to improve.

Q. What about training for community organisations?

A. Appropriate training can be provided if there are the resources. Local communities must think long-term, not just react when a planning application is made close to them. The trials the Government is going to run should help ascertain what is wanted.

Q. Most fundamental, how does the world of beauty and design codes fit in with the world of expanding permitted development?

A. The motive behind expanding permitted development is that it produces more homes, and so it is not going to be abandoned. Recent changes have embedded more standards into the permitted development regime and it is for local authorities to require as high quality as they are able within the law as it stands.

London Forum responds to NPPF and NMDC Consultation

Our full response to this consultation can be seen [here](#). On the NPPF, our main points are as follows:

1. We welcome the commitment to promoting a “sustainable pattern of development”, but regret that nothing is said about what this means, or looks like.
2. We disagree strongly with the proposal to restrict dramatically Local Authorities’ scope to introduce Article 4 Directions.
3. We disagree with the plan to exempt all but major developments from being required to make affordable housing contributions, and with the intention, where a contribution is required, that at least 10% of all homes should be for affordable home ownership. In London, the former is quite unnecessary and the latter will benefit the already well-off.
4. We have written to the Government to point out that there should have been another change to the NPPF. The Minister issued in December 2020 a direction to the Mayor to put in the new London Plan Policy D9 the words “Tall buildings should only be developed in locations that are identified as suitable in Development Plans.” That delegation of decision making to local authorities should be national policy.

On the National Model Design Code, we support the direction of travel, and welcome the emphasis on consultation and community engagement at each stage in the process. But:

1. The suite of documents is confusing and repetitive, and needs streamlining.
2. Design coding will be a lengthy process; most local authorities do not have the resources to commence the work in the short term and many lack the skills that will be required.
3. LA's will have to prioritise those areas and sites where design coding is most worthwhile, either because development is imminent, or because of the sensitivity of the location, etc
4. Will design codes have any meaning for town centres, given the probable flight to residential in light of the E to C3 Permitted Development Right?
5. The NPPF and Planning Inspectorate will need to support LAs in rejecting planning applications that fail to conform with design codes; otherwise, communities will rapidly become disillusioned.
6. The consideration of whether or not a planning application conforms to a design code could be subjective and may be delegated to a planning case officer who has been negotiating with the applicant on changes to the scheme.



Civic Voice and University of Reading to update research on Statements of Community Involvement. Civic Voice Executive Director, Ian Harvey writes

There is no requirement in legislation for local planning authorities to consult when reviewing and updating their Statement of Community Involvement. [In the Civic Voice 2020-23 manifesto](#), we committed to a campaign to strengthen Statements of Community Involvement (SCIs) so that they set out more

clearly how the local authority and developers are expected to meaningfully engage with local communities on planning issues.

We started this in 2019 by undertaking freedom of information requests to all local planning authorities and discovered that 30% of the 275 responses were 'out of date', i.e. more than 5 years old, with the oldest dated 2006! 37% of councils said that they anticipated updating their SCI in the next 12 months and with only 11% specifically mentioning the local civic society.

We are now updating this data, in a project with the University of Reading, but we need the help of civic societies nationwide. We need your contribution to tell us about your local SCI. Fill in the online research with University of Reading to give us the data for your locality via [this link](#)

We believe that Statements of Community Involvement must be the bedrock of community involvement. Unfortunately, far too many have become too long, out of date and out of touch documents, stating little more than the statutory requirements.

In our response to the recent consultation on the National Model Design Code, we recommend that the Government highlights good practice through a 'National Statement of Community Involvement', showcasing 'best in class' engagement at the different stages of the planning process.

Densification of Housing in the Outer Suburbs

Gordon Massey, Barnet Residents Association writes that widespread redevelopment of mature suburban housing will be damaging not just to the streetscape, but also to the social fabric of the suburbs. Read the full article [here](#). In summary, Gordon's argument runs as follows:

1. The principal ways that housing densification might be achieved in the suburbs are high rise developments, new developments on identified and windfall sites, and redevelopment of existing housing.
2. Dense developments of high rise flats in the suburbs are very controversial, and the new London Plan strengthens boroughs' ability to be very specific about areas where tall buildings are acceptable. Large numbers of tower blocks will no longer be an acceptable option for meeting outer boroughs' housing targets.
3. Barnet has some 65 identified sites with development potential for 16,000 homes. However many of these are very unlikely to come forward for

development in the near future, and the London Plan's estimate of 4,000 units over 10 years seems reasonable. But that will only meet 20% of Barnet's target for new homes.

4. What we are then left with is the extensive replacement of existing housing, 'gentle densification', as advocated in the Policy Exchange paper 'Strong Suburbs' – see [here](#). In the London Plan this is seen as a secondary area, but it may become a major driver of additional homes in the suburbs as planning constraints on such developments are weakened.
5. The Stronger Suburbs paper advocates replacing whole streets of housing based on residents voting on what change they want. This may be fine for run-down areas where residents are eager for change, but the suburbs are largely defined by streets of well-maintained detached and semi-detached houses built from the 1930s onwards, with many extended by their current owners.
6. There is strong resistance to demolition and rebuilding with small blocks of flats, with four out of five recent schemes being turned down. Design was not a significant concern; residents simply considered that blocks of flats in streets that are characterised by family houses would be highly damaging to the social fabric.
7. Against this background 'Strong Suburbs' appears astonishingly out of touch with how much people are attached to their suburban homes, and their antipathy to radical change.
8. If the authorities insist that redevelopment of the suburbs has to be accepted as means to achieve intensification, people will have the options to embrace, to acquiesce, to fight, or to flee. If they depart in large numbers, the character and social fabric of the suburbs will change fundamentally, and not for the better.

Readers are invited to send comments to membership@londonforum.org.uk

Mike Saunders, CEO of [Commonplace](#) on why digital engagement will be increasingly important for communities everywhere

Commonplace has always been about connecting people to places to accelerate collaborative and positive change. Our online platform is used by local authorities and developers to run consultations and engagement projects, often as part of a

planning process. But our core interest is actually in creating opportunities for local communities to have a joined-up conversation about a place.

In the Autumn we ran a nationwide poll and focus groups to understand how the UK public feels about their opportunity to engage with planning. Some of our findings may not surprise you: participation is very low (only 27% had ever engaged in a planning conversation and of those, twice as many had signed a petition to object as had taken part in any engagement process). But part of what we found was surprising: there is a **huge** demand: 76% of people said that local people should be given a greater say in planning decisions, and 71% said they wanted regular updates on planning. You can [download the full report here](#).

Why is engaging digitally important?

We conducted this research in part to respond more effectively to Government's white paper on planning. Our conclusions were that although there is a great demand, there are huge barriers to people participating: accessibility and trust being the largest.

Over 2.5M people have engaged on Commonplace to date, of whom over 1.5M have been in the last year. Commonplace respondents come back repeatedly: on average they contribute six times, and they also want to be connected to other local opportunities to have their say: 87% of them said they want to hear about other projects and conversations in their area.

Digital platforms have a major role to play in breaking down barriers to participation (such as accessibility and trust), and that is what we aim to do every day at Commonplace.

What changes are likely to make digital engagement even more important?

We don't yet know exactly how the Government's proposals for planning will be implemented but judging by the direction of travel it seems certain that the role of design codes will become increasingly important.

Design codes shape how the built environment around us will look and function. Following the [Building Better Building Beautiful Commission "Living with Beauty"](#) report, a consultation on draft changes to the NPPF and the NMDC has recently



taken place. Design codes are of huge significance to designers and planners but often completely unseen by the public, and they could become more specific and powerful under the Government's full planning reform plans.

Engagement as a process

Design codes are relatively complex. In order for communities to have meaningful input, they need to be part of a continual local conversation throughout the entire planning lifecycle – not just for the short period when a design code is being prepared. A digital platform like Commonplace is a great way to establish and maintain this conversation: it is cost effective and always on, works on people's mobile phones, can achieve high reach into the community, works alongside more intensive in-person events like workshops and community meetings, and provides an easy and reliable data store that safeguards the provenance of the conversations.

Commonplace is used by over 100 local authorities across the UK, by property developers and housing associations including Grosvenor, Lendlease, Notting Hill Genesis and Mount Anvil. To learn more about our research into community engagement - [download our ebook here.](#)

Briefly noted

Chair of HTA Design and London Forum President, **Ben Derbyshire** took part in the NLA webinar, "**What do we need from the next Mayor of London?**", along with other leaders of built environment professional bodies and representatives of the main political parties. He opined that the London Plan fails to tackle the crisis of housing supply, affordability and homelessness, and proposed an Urban Expo promoting the best ideas for post-pandemic London. Watch and listen to Ben's contribution [here](#), starting about 22 mins in.

Readers who are confused (who isn't?) by MHCLG announcements on **Permitted Development Rights** from business and commercial uses to residential are referred to a comprehensive and professional analysis of the new PDR by planning consultants Lichfields; see this [link](#), and another one [here](#) to their excellent chart

which covers Class MA, Class O and Class M limitations, conditions and prior approval matters.

The Housing, Communities and Local Government (HCLG) Select Committee is holding an **Inquiry into Permitted Development Rights**. “The aim of this short inquiry is to examine the Government’s recent and proposed changes to permitted development rights in respect of large-scale development, commercial-to-residential conversions and changes of use between different types of commercial and retail premises. In particular, the inquiry will explore their role in supporting economic growth and their impact on local authorities, including their ability to plan development holistically, developer contributions, the provision of services and social housing and the supply and quality of new homes.” London Forum may email members separately about this. More information [here](#); evidence to the inquiry can be submitted [here](#) until Friday 30 April.

Readers might be interested in a recent communication, [here](#) from MHCLG Chief Planner, Joanna Averley to Local Authorities about further changes to the planning system. It confirms the Government’s intention, opposed by London Forum and the GLA, to enforce a proposal that a substantial proportion of affordable homes on new developments should be “first homes”.

The GLA has published an interactive on-line [Planning Data Map](#) of London which can show any of the London Plan's designated parts, such as Opportunity Areas, Metropolitan Open Land, etc.



Round the Societies - items from members' newsletters that caught our eye

THE EALING society reflects others' experience that few applications to which they object are turned down. They bemoan the proliferation of tower blocks of small but expensive flats that do not meet local needs; the 26-storey tower for Perceval House and two large developments on Uxbridge Road, being the latest allowed in their area. The **RICHMOND** and **KEW societies** are angry that the Secretary of State has refused to review the Mayor's decision to overrule the local authority and permit a development on the Homebase site in Manor Road for 453 residential units in five 4- to 11-storey blocks, against the Local Plan's maximum of six storeys. **THE ENFIELD society** view with alarm proposals to regenerate Enfield Town with a scheme for 600 residential units in six 7 to 16 storey blocks, which will tower over the historic market town and Conservation Area.

In **DULWICH** a crowdfunding campaign for a Judicial Review of the consent for development at Sydenham Hill has been successful and the application granted. We await to see the outcome of this.

THE ISLEWORTH society report plans to build 80 flats on the Park Road Allotments, reducing the allotment to a third of its size. It raises questions of whether allotments are at risk in other areas?

Thankfully, an application for a development on Metropolitan Open Land in Ealing we hear has been refused.

Across London we see societies raising concerns on the expansion of permitted development from Class E to residential, which many fear will allow developers to make poorly-designed conversions with potential wider negative impacts on high streets. The **HIGHGATE** society views the situation with such alarm that it devoted its entire quarterly report to the "crisis".

With sadness, the **STREATHAM society** mourn the passing of E & A Wates furniture business, established in 1900 but forced to close as a result of the pandemic. It's passing may likely impact negatively on the local parade of shops.

THE WESTCOMBE and **GREENWICH** societies are amongst many urging a more considered approach to Low Traffic Neighbourhoods. They highlight the great difficulty in seeking a holistic approach for their area. Of interest we noted the start-up of a small regenerative farm enterprise Sitopia, within Woodlands Farm on Shooters Hill, which aims to produce and sell sustainable food locally. This has been supported by The Mayor who has pledged nearly £40k, so we wondered if

similar enterprises are planned in other areas?

The full length version of this report can be read [here](#)

Mayoral Election

Clean Air – Our Choice, Daniel Instone writes

It has been quite a time for air quality. First, we have certainly got to know what good air quality feels like, from the reduction in traffic over parts of the last year – one of the few good things about the Covid pandemic.

But second, this has been set in a period starting only a few years before now, when concern about air quality has risen dramatically up the political agenda. This is very evident from looking at the statements now being made by the candidates for London Mayor in the run-up to the election on 6 May. All of them appear to highlight the need to improve air quality in one way or another.

Sadiq Khan, for Labour, who is currently well ahead in the opinion polls, is expecting to continue the policy agenda he has already set. The biggest part of this is the ultra-low emission zone (ULEZ), which was brought in last year to cover the centre of London – so that drivers of cars with poor emissions have to pay an extra emissions charge, in addition to the congestion charge. On Sadiq Khan's plans, announced some months ago, the ULEZ (but not the congestion charge) will be extended, on 25 October this year, to cover the whole of London inside the north and south circular roads. And he has encouraged schemes to making walking and cycling earlier, while preserving existing transport routes, despite greatly reduced usage during the pandemic.

But all the other main candidates are highlighting the need for cleaner air as well. **Shaun Bailey (Conservative)** wants a zero-emission bus fleet and interest free loans for black cab drivers to go electric. He also says he will use revenues from the ultra-low emission zone to replace old buses with zero-emission buses –

though at the same time he says he will cancel the plans to extend the ULEZ to the north and south circular roads. So air quality would be less good than otherwise in the inner suburbs, balanced against more freedom for car drivers over choice of car or van.

The Liberal Democrat (Luisa Porritt) and Green Party candidates (Sian Berry) are committed to encouraging walking, cycling and public transport use, to improve air quality; and in particular support road pricing based on how far each vehicle actually travels, as opposed to the current fixed daily charges - something the London Forum has also supported.

So although all the main candidates are strikingly committed to improving air quality, the election result could make a significant difference to what policies are actually pursued.

Electing a Mayor, Andrew Bosi explains all

The Home Secretary's proposal that in future the Mayor of London should be elected using First Past the Post (FPTP) is seen by many as a retrograde step designed to ensure that the Mayoralty remains exclusive to the two main political parties. In fact FPTP would not have altered the result of any of the five elections so far, assuming people had not changed their vote on account of the voting system.

A proportional system means that more people's votes influence the result, but the present system is far from perfect. In the first preference column the race for second place becomes as important as who leads, which is why the incumbent Mayor is keen to emphasize the two-horse nature of the race.

The system by which GLA members are chosen has been more successful in reflecting the level of support for minority parties with a significant level of support, but Alex Salmond may have exposed a flaw in that too. If the Labour and Conservative Parties were not to contest the "list" seats, but give their support to distinct Socialist and Tory parties respectively, it is possible that they could squeeze

out the minority parties in the way Salmond claims he is boosting representation of Independence candidates over Unionists.

The requirements for nomination to be a Mayoral candidate are quite onerous- they require nominations in each of the 33 Boroughs. Some would-be candidates have failed to make it, but there are nonetheless 20 declared runners and riders this year. This gives a ballot paper with forty boxes and a requirement to tick no more than one in each of the columns. It will no doubt be argued that halving this number by reversion to FPTP would simplify matters.

Although voting systems may seem arcane or the stuff to excite only political anoraks, Amenity Societies should involve themselves in any public debate. The Mayor has considerable influence over what local councils can do in matters of planning and transport which are central to our raison d'être. The Forum has expressed support for road pricing, viable town centres, densification on brownfield sites, protection of heritage and conservation areas, and against the overdevelopment that manifests itself in skyscrapers that spoil the view and foster the wind. Few candidates display much understanding of these issues and of the damaging side-effects of some government policy, or the damage done by calling in an application refused on the basis of a local plan and then allowing it. A couple of candidates have been clear about the benefits of road pricing, but it could be argued that the present system does not offer the choice many voters would like to have. The bigger political parties could fairly be accused of focusing on more immediate electoral considerations, rather than looking for candidates who might transform London for the better and provide a more lasting reason for supporting their party's candidature.

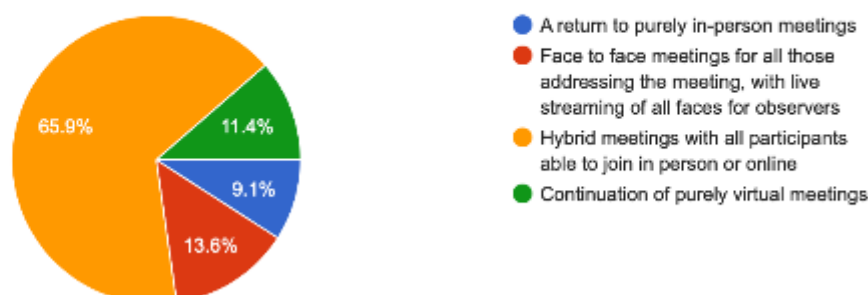
London Forum fears more delegation to officers when Online Planning powers expire

The Government has announced that the legislation allowing virtual meetings of Planning Committees will be allowed to expire on 6th May, 11 days ahead of the

earliest date at which public meetings -with social distancing - might be allowed. A spot poll of London's civic societies conducted by the **London Forum of Amenity and Civic Societies** reveals that three-quarters of the 44 respondents would like to see partial or complete continuation of virtual meetings, with a majority in favour of hybrid meetings in which all parties could participate virtually or in person – see graphic below.

Which would you prefer to see in the future, once Covid restrictions are lifted:

44 responses



One society commented: “Even if and when restrictions are lifted and in-person meetings allowed, there are likely to be people who hesitate to attend any mass gathering for a while. The option to have hybrid meetings caters for everyone and would therefore be the best option in our view.”

One concern is that premature expiry of the provision for virtual meetings could result in even fewer planning applications reaching Planning Committees than hitherto. At the start of lockdown, London Forum joined forces with Just Space and others to press boroughs into sticking with their existing rules for deciding which applications are determined by council officers and which at Committee. The overwhelming majority of boroughs have done this.

London Forum is now proposing that boroughs adopt a procedure similar to that in use at LB Hounslow, as follows:

- a weekly list of delegated planning decisions is published to the list of organisations in the borough's Statement of Community Involvement.

- residents and other stakeholders can ask the ward Councillors to call-in any application to the full planning committee where they think the intended decision and its reasons are wrong.
- the request is considered by the lead Member for Planning, the Head of Planning and the chair of the Planning Committee and may result in full consideration by the committee's Councillors.

The Secretary of State now appears to be supporting the resumption of online Planning Committee (and other) meetings. He has announced that he is backing a High Court move by Lawyers in Local Government and others to have such meetings declared legal after the current legislation expires. MHCLG has also launched a consultation on the topic, see [here](#)

Jane Maggs – Woman of Influence

I am sure that all Insights readers will want to join in congratulating Jane Maggs of London Forum member Southgate District Civic Voice on her nomination by The Planner magazine as a Woman of Influence 2021. The citation reads:

"Jane gives back and really cares about communities having a voice in the planning system Over the last 18 months, Jane was instrumental in organising a community planning weekend to encourage the wider community of Southgate to come together to discuss and respond to a particularly controversial large development proposal in Southgate town centre, called Southgate Office Village. Concerned that the planning application for a 17-storey tower was becoming increasingly contentious locally and political, Jane approached Civic Voice to see if we could help her to facilitate a series of workshops to reduce the temperature of the debate locally, explain what's actually being proposed and encourage the local community to 'have their say'.

"Civic Voice helped to facilitate the sessions, but Jane led the organisation, publicity and developed excellent working relationships with local councillors, MPs, local authority officers, businesses, and community groups to ensure a good attendance

and discussion on the day and at the follow up feedback session. The sessions were held in June 2019 and had over 250 people participating. All organised in less than six weeks for approximately £300, with greater public participation than the developer's PR consultants had achieved. The weekend gave local residents, politicians and anyone interested time to understand, raise and discuss the implications of the planning application and consider alternative ideas.

"Since this, Jane has presented her work and an overview of the process the society undertook to other civic societies at various Civic Voice events over the last year. Her work on the Southgate Office Village inspired us at Civic Voice to see the potential of 'community panels' and a role for civic societies in encouraging the wider community to get involved and shape local development proposals. This has led to us successfully campaigning for community panels and civic societies now being named in National Planning Guidance."

London Forum Chairman Peter Eversden added "Jane is an inspired civic society leader who has a lot of influence over her local Council. Her talent for organising and following-up on charettes will be important for working with local authorities to conduct character analyses and to prepare for the introduction of design codes in planning."
