

Housing Design Standards

Consultation 11th February to 27th March 2022

MORA Comments:

1 About this document

Who is this guidance for?

This guidance is aimed at developers and their design teams seeking planning permission, and borough development management officers.

It is our understanding that the LPG (London Plan Guidance) is primarily to clarify and give further guidance to the existing agreed Policies of the London Plan.

This document is predominantly an expanded index to the relevant London Plan Policies, and in the majority of cases does NOT clarify, define, or provide additional quantifiable information than that already proffered in the respective London Plan Policies.

As the Guidance is for Developers and their Design Teams for the purpose of identifying relevant Policies and their reference location, the actual guidance needs to be clearly written and unambiguous as required of NPPF para 16. Policies need to be specific and enforceable by Planning Officers. Any vague or subjective definition would therefore be unhelpful and would require further clarification in order not to defeat the objective of the LPG.

1.1 What are the 'Housing Design Standards'

... It provides a set of standards that relate to housing design. It does not attempt to reproduce the content of the Plan and **compliance with this guidance should not be inferred to mean compliance with the policies**. It applies to new housing that falls within Planning Use Class C3. This includes most forms of housing for older people (including extra care), but not shared living which is treated as sui generis.

The statement "***compliance with this guidance should not be inferred to mean compliance with the policies***" **undermines the objectives of the Guidance**.

It the guidance is NOT to HELP applicants' or developers' proposals to be compliant with the Policies, WHAT IS IT FOR?

2 Part A: Placemaking and the public realm

The paragraphs 2.1.1 to 2.1.8 are all subjective objective descriptive phrases with no definitive Policy definitions. Where is the guidance to assist developers meet these objectives?

A	Placemaking and the public realm
A1	Response to context and the climate emergency

A1.1 What is meant by “Respond positively to the unique characteristics of a site” and how can such a requirement be met from a Policy perspective? How can a determination evaluation of compliance respond to such a vague and subjective assessment and be judged as meeting the requirement?

A1.2 What defines “making every attempt to....”. On what are the criterion to decide whether to retain and re-use existing structures in preference to demolition and reconstruction? Guidance would be preferred in the methodology to determine the decision-making process to assess and meet the objective. The guidance does NOT provide that.

A1.4 This should reflect the Local Design Code.

A1.6 The guidance should provide a definitive process to evaluate, develop, and extend “Green Infrastructure”.

A1.8 The Guidance should reference BRE Sunlight and Daylight recommendations, measurements, and limits.

A1.12 Air Quality Assessment requires quantifiable limits of acceptable and unacceptable content percentages and how it should be calibrated with specified measurement equipment.

A1.14 There needs to be Thermal Efficiency Building regulation standards and requirements which need to be referenced and met.

A2	Land use mix
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A2 Land use mix

A2.1 In what way could a developer “*Demonstrate*” that their proposal ‘mix’ meets the strategic and local requirements other than by contributing and complying with the published Local Plan Policies?

A2.2 Local Planning Authorities of the London Boroughs may have a preferred percentage distribution of “Dwelling” types and Accommodation requirements in their Local Plans. Policy H10 does NOT provide guidance but objectives.

A3	Streets
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A3 Streets are not thought appropriate for this Housing Design Guide LPG.

Streets are a separate issue from ‘Housing Design Standards.’

Streets only need to be part of a development proposal for major whole estate developments which should be a separate Strategic LPG.

What have “Streets” got to do with “Housing Design” other than a way to get to those houses? Street formation and access are a strategic issue and should be dealt with in a separate LPG!

A4	Public open space, biodiversity and urban greening
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A4 Public Open Space, Biodiversity, and urban greening (Again NOT thought appropriate for Housing Design Standards)

A4.2 By what parameter measures the “Net increase in biodiversity”? Policy G6 does NOT give guidance on how this increase can be quantified or defined.

A4.3 To meet the “No net loss” of green cover, any redevelopment which requires dwelling demolition and re-development would require the new proposal to have the same footprint of the demolished structure so as to retain the pre-demolition garden space! Unless the roof were to be “green” (Not realistic as there would be no financial incentive or benefit).

A5	Inclusion and Accessibility
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A5 Inclusion and Accessibility

Access to Backland Developments:

Access Driveways

The Access to Backland Developments usually takes advantage of the separation between existing dwellings or a rear access to garages of existing dwellings.

Alternatively, there could be a need to demolish an existing dwelling in order to gain access to the backland development site.



There are separate conditions that require clarification for Housing Guidance for applicants.

1 Ownership of the access drive if used by existing Residents along the street to gain access to their garages or for legal rear access to their properties.

2 The width, length and surface condition of the access and provision of a turning head within the site for ingress and egress of vehicles.

3 The maximum length of the access route from the highway to the backland development should be specified;

4 The 'minimum' Length of the Access (Driveway) Route from the public highway and public footpath to the Backland Development for which any greater length would require:

- i. kerbs both sides of the access driveway;
- ii. A footpath for pedestrians, pushchairs and wheelchair users;
- iii. A requirement for vehicle passing bay;
- iv. Special consideration for wheelchair accessibility to avoid an oncoming vehicle;

5 The minimum width of the access driveway between kerbs the full length of the driveway should be specified;

6 The Minimum distance over the length of the access drive or spacing between passing bays for vehicles;

7 The structural strength specification of the driveway to sustain regular heavy goods vehicles, Refuse vehicles or Fire Tenders and emergency vehicles;

8 The minimum length of access driveways without a turning head (in which case vehicles would need to reverse out across the public footpath with limited sight lines – unless reversing into the access driveway);

9 The minimum distance from the furthest development dwelling to the nearest Fire Hydrant. (if over 100m a new nearer Fire Hydrant should be required of the Developer);

10 The Swept path illustration should be provided for heavy goods, Refuse, and emergency vehicles from the highway (road width restriction) turning circle into the access driveway. The full width of the highway would be needed to gain access; therefore, "Double Yellow Line" parking restrictions would be necessary for about 30m both sides of the highway either side of the entrance to the access drive to ensure the full width of the road is available for negotiating access.

3 Part B: Shared spaces and ancillary spaces

3.1.1 The majority of new homes delivered over the Plan will be flats, and therefore it is

important that shared indoor and outside spaces and ancillary facilities are well designed.

Shared Communal Open Space provision for Flats and HMOs in proportion with the number of occupants of a development proposal. The amount of Communal Open Space per occupant such that a reasonable percentage of a Site Capacity can be allocated. Without a specified quantity, developers can assume any minimal amount is acceptable.

3.1.4 The design of shared, ground floor outside spaces needs careful thought, particularly when surrounded by tall buildings.

Rather than thinking about it, it would be useful to know the area of outside space required for Parking and the Area taken up by the access drive to those parking spaces as that would assist in determining a proposal's "Site Capacity."

B	Shared spaces and ancillary spaces
B1	Approach routes and entrances

Our Comment to A5 Inclusion and Accessibility **also applies to "Entrances" for Access to Backland Developments.**

B1.1 & B1.2 No Comment

B1.3 Areas for Public and Private Access should be quantified so as to contribute to the assessment of "Site Capacity."

B1.4 No Comment

B1.5 All Occupants (Residents) to have access fobs to gain access if an access control system is deployed.

B1.6 & B1.7 No Comment

B1.8 "Demonstrate?" Require location to be indicated on the supplied Plans and Design and Access literature.

B1.9 Policy D6 does not define or cover this requirement in Table 3.1 or the text. Therefore, it is NOT a Policy that can be enforced.

B2	Internal circulation and dwellings per core
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B2.1 No Comment

B2.2 Policy D6 does not define or cover this requirement in Table 3.1 or the text.



Therefore, it is **NOT** a Policy that can be enforced.

B2.3 to B2.5 **No Comment**

B3	Storage of bicycles, mobility scooters and wheelchairs
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B3.1 & B3.2 **No Comment**

B4	Car parking
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B4.1 **No Comment**

B4.2 The Parking **Area** needs to be quantified on the supplied plans to aid assessment of “Site Capacity.” Also Swept path illustrations should be provided to ensure access and exit is reasonable with all other bays occupied showing minimum manoeuvres.

B5	Access for emergency and service vehicles and fire safety
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B5.1 Fire Safety for “Backland Developments” need especially to be defined. Access requirements for emergency vehicles and Fire Tenders need to be specified. Locations of safe assembly points need to be identified.

B5.2 Location of “Fire Hydrants” need to be specified.

B6	Dealing with waste and recycling
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B6.1 **No Comment**

B6.2 & B6.3 The maximum “Pull distance” of refuse bins from storage to the collection vehicle should be stated. For Communal Refuse and Recycling, the Maximum distance from dwelling to storage bins should be stated. The volume of communal storage Refuse and Recycling Bins should be defined in relation to the number of occupants of the development.

B7	Supplying energy efficiently (being Clean)
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B7.1 & B7.2 **No Comment**

B8	On-site renewables (being Green)
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B8.1 **No Comment**



B9	Shared outside amenity space
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- B9.1 The Area provided for Communal Open Space per occupant should be defined.**
- B9.2 Define what are the limits of “multi-functional” or what requirements the open space actually needs to meet.**
- B9.4 What is meant by “Explore Opportunities.” What the LPG needs to provide is guidance on what is required NOT ideas on what could be required.**
- B9.5 This has already been identified under A1.8.**
- B9.6 & B9.7 No Comment**
- B9.8 The access route minimum width should be specified in order to provide adequate space for the passage of mechanical aides to the open space areas.**

B10	Management and maintenance
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- B10.1 No Comment**

4 Part C: Homes and private outside space

4.1.1 All homes are required by the London Plan to meet the Nationally Described Space Standard. However, this is an absolute minimum not a target. This guidance encourages homes to exceed these standards by at least five per cent to improve residential quality and accommodate the changes in working patterns experienced as a result of the Coronavirus pandemic which are likely, in part, to be enduring.

Table 3.1 should be modified to indicate this relaxation either by updating the Table data or with a Reference Note indicating a 5% recommended increase. If no mention of this 5% recommendation is made on Policy H6 Table 3.1, no applicant will consider this to be a valid recommendation as it affects the spatial capacity of a proposal.

4.1.2 Visual privacy is more difficult to achieve in dense environments particularly on lower floors. Off-setting windows, or angling them, can mitigate issues and fixed or movable screening devices can also be effective where they are an integral part of the overall design, including on balconies.

The minimum distance between perpendicular and angular facing windows or balconies should be specified in metres. Any overlooking distance should have a minimum distance specified.



C	Homes and private outside space
C1	Inclusion and accessibility

C1.1 No Comment

C1.2 In such situations, step free access could be provided by Ramps. If ramps are considered the maximum inclination should be specified.

C1.3 No Comment

C1.4 This breaks equalities considerations – why should these special requirements apply to some occupants and NOT others?

C1.5 No Comment

C2	Internal space standards
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C2.1 This contradicts para 4.1.1. Where are the Space Standards for M4(3) specified?

C2.2 Correction to C2.1 to require a 5% increase on Table 3.1

C2.3 No Comment

C2.4 The circulation space NOT to be included in the assessment of floor area calculations needs to be quantified and shown on the floor plans provided with the proposal.

C2.5 No Comment

C2.6 Does it mean that these Policies that have full weight for implementation and if not compliant, proposals can be refused? It is our understanding that only Policies included in the London Plan document were mandatory and any in London Plan Guidance were as stated, just guidance, and did not have full weight of the London Plan to be compliant requirements.

C2.7 Again, is this mandatory or just guidance. Could an application proposal be refused if this 5% increased Storage requirement (Table 3.1) was not met?

C2.8 Same comment as C2.7.

C2.9 to C2.11 No Comment



C3	Choice and flexibility
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C3.1 The capability for change of structure should be explained. For what reason should this flexibility be required?

C3.2 No Comment

C3.3 With open plan layouts, what is the unit of Residential Density as habitable rooms per hectare is NOT an accurate parameter?

C3.4 to C3.6 No Comment

C4	Aspect, orientation, daylight and sunlight
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C4.1 to C4.3 No Comment

C4.4 Define the minimum set-back distance if they do NOT comply.

C4.5 to C4.8 No Comment

C5	Air quality, external noise and soundproofing
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C5.1 to C5.3 No Comment

C5.4 Why airborne positive 5dBA and Impact negative 5dBA?

C5.5 No Comment

C5.6 What is considered a high level of sound insulation? What is the attenuation in dBA required?

C6	Thermal comfort
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C6.1 These are subjective heating limitation requirements but give no guidance to what is actually required of a proposal.

C6.2 Daylight and heating assessments requirements need to be quantified. Daylight requirements need to meet BRE Standards.

C6.3 Again, this guidance does not specify the ventilation requirements. A guidance of how many air changes (Volume/hour) needs to be provided.

C7	Water usage
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C7.1 No Comment

C8	Digital connectivity
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C8.1 Ducting for fibre connectivity from external access to appropriate internal terminal position.

C9	Fire safety
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C9.1 Wheelchair storage with associated charging point.

C9.2 Ensure the dwelling is within 100m of a Fire Hydrant.

C10	Private outside space
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C10.1 No Comment

C10.2 Best Practice is not Policy so cannot be enforced. What incentive is there for Developers to meet “Best Practice”?

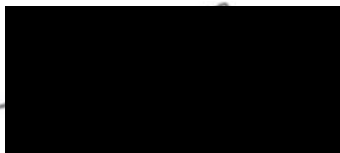
C10.3 No Comment

C10.4 Not enforceable as not Policy. What is considered a high level of “Noise” in dBA? What velocity is considered “Strong Winds”?

C10.5 & 10.6 No Comment.

Appendix 1 Furniture Schedule & Appendix 2 Dual aspect definition - No Comment

Kind Regards



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