Thames Gateway

Thames Gateway assessment of planning applications

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1. Executive Summary

1.1 Introduction

As part of the CABE-CLG Service Level Agreement that began in July 2007 until December 2008, CABE committed to undertake an assessment of housing planning applications across the Thames Gateway. The purpose of the assessment was to provide CABE with an early indicator of whether an audit of completed housing schemes in 2010 will meet CLG’s aspirations for improved quality. It was anticipated that the exercise would also provide evidence of the quality of planning decisions within each Local Planning Authority (LPA) in the Thames Gateway and an understanding of the level of competency in making decisions about design quality.

CABE committed to use the Building for Life (BfL) standard to assess a sample of between 30-60 residential development schemes at RIBA stage D that had been granted planning permission within the previous two years. In total a sample of 41 schemes were assessed from 13 Local Planning Authorities (LPAs), including the two Planning Authorities in the Thames Gateway development corporations.

1.2 Findings

Overall 22 per cent of schemes were classed as good or very good, and therefore potentially worthy of a BfL award. These schemes demonstrate what can be achieved within what are often the same regulatory and market conditions. The proportion of schemes scoring good or very good is a similar outcome to CABE’s national housing audit. The main disparities were with the poor and average schemes. 39% of schemes were assessed as poor and 39% of schemes were assessed as average. Overall, the Thames Gateway assessment presented a higher proportion of poor schemes and a smaller proportion of average schemes compared to the national audit.

The assessment indicted that there was a disparity in the quality of schemes between the London Thames Gateway and Kent and Essex Thames Gateway areas. The number of good and very good schemes is greater from the sample that fall within the London Thames Gateway area compared to those in the outlying Thames Gateway area. There was only one good and one very good assessment outside the London Thames Gateway. The proportion of poor and average schemes was far higher in the outlying Gateway area. There may be a number of planning and economic conditions in the London Thames Gateway that could account for this, including tighter planning design policy, the London Plan, greater regional design resources as well as potentially higher land values within the London region.

The assessment showed that out of the four BfL sections, design and construction was the weakest area for both the best and worst performing schemes. Questions that scored particularly poorly include question 14 ‘has the scheme made use of advances in construction or technology that enhances its performance, quality or attractiveness?’ and 15 ‘Do internal spaces and layout allow for adaptation, conversion or extension?’ The highest performing BfL section was environment and community. Questions that
scored well include question 16 ‘Does the development have easy access to public transport?’ and question 20 ‘Does the development provide (or is it close to) community facilities, such as a school, parks, play areas, shops, pubs or cafes?’

1.3 Issues

The evidence shows that achieving a target of 50 per cent of schemes scoring a good rating will involve a major step change. The issues presented in this report articulate areas that must be addressed if that change is to happen. The main issues are:

- In the better scoring schemes we saw that developers tend to rise to the demands made by LPAs. For example, where the design content is clearly set out and referenced to development frameworks or masterplans better quality schemes were submitted. If LPAs do not demand high standards of design and do not clearly set out what is expected, developers may not perceive a direct incentive to deliver higher standards and miss the opportunity for a smooth path to planning approval;

- Promoting an awareness of a local or Thames Gateway identity and environmental sustainability issues such as energy efficiency, water conservation, flood risk or green space strategies was rare in the schemes assessed. Raising aspirations which cover a commitment to the regional environmental framework, culture and placemaking, as well as the structure of the new and existing places, mix of uses and open space networks needs to be clearly stated in masterplans, supplementary planning documents (SPDs) and briefs guiding development;

- All but one very good scheme was within an inner London authority. The conditions, policies and processes that are delivering better design need to be strengthened in outer London areas so that developers perform equally well across the region;

- The lowest scoring section of the BfL criteria covered by the assessment was design and construction. This was particularly evident in urban apartment schemes where the approach to size, internal layout and corridors was outdated. Perpetuating mistakes of the past by granting permission to schemes with narrow internal corridors, shared kitchen and living rooms and internal kitchens with no natural lighting and multiple entrances will only serve to create severe social problems;

- The schemes that scored 16 and above all demonstrated an appropriate and well considered design approach and created a bespoke layout and response to the site. They were also distinctive in that they had comprehensive and well considered design and access statements which fully encompassed the wider context of development. In relation to the average and poor schemes, many developers are missing the opportunities to create value and distinctiveness and are failing to exploit their schemes’ surroundings and fit the local context;

- Awareness of BfL appears to be growing throughout the Thames Gateway and some of the authorities we talked to are beginning to use it as part of the planning
process. In some cases it is being used as part of pre application discussions, but it is not widely used at the moment to evaluate planning submissions as an indicator of design quality.

Recommendations

1. A strategic planning approach is fundamental to the successful delivery of the Thames Gateway vision.

2. There needs to be the necessary capacity and skills in all local planning authorities throughout the Thames Gateway to support both the planned growth and the delivery of advances in design and sustainability techniques in line with the aspirations for the Gateway.

3. Local authorities must take the lead on setting the design and placemaking agenda.

4. There needs to be appropriately coordinated support to Local Planning Authorities by national, regional and sub-regional advisory organisations working in the Thames Gateway.

5. LPAs need to use policies and guidance to enhance and protect existing environmental, built and cultural assets.
2. Background to the Thames Gateway assessment

2.1 Thames Gateway policies

In November 2006, CLG published the Thames Gateway Interim Plan Policy Framework setting out the Government's commitment to establish ‘the Gateway as a distinctive economic and social unit …to shape and guide investments, decisions and actions. … A framework which integrates economic, public service and housing development’.

The Interim Plan made three clear commitments related to raising the quality of design across the Gateway:

- “Thames Gateway Strategic Partnership (TGSP) will develop a Gateway Design Pact that will be a commitment to specific actions to improve the quality of all new development.”
- “CABE will do repeat housing audits as an independent check on whether quality is improving. Our aim is that by 2010, no scheme will be assessed as poor, and that at least 50 per cent of schemes will be good or very good, with that rising to 100 per cent by 2015.”
- “We will prepare a Parklands Framework and Delivery Plan to show how existing strategies, schemes now underway, and new proposals can create a new landscape to live in sustainably. We will consider how all sources of funding can best be prioritised.”

In 2007 CLG set out specific proposals for the Thames Gateway in the publication of the Delivery Plan. The plan makes a pledge to improve the quality of new housing and measure progress in the Thames Gateway through CABE’s housing audits.

The Delivery Plan states that Government want to build a vibrant economy with at least 225,000 new jobs, improve the quality of life for residents of the Gateway by providing 160,000 good quality homes and establish the Gateway as an Eco-Region. The report sets out Government’s seven ‘high level regeneration outcomes’ for the region, among these are the following:

- “A sustainable increase in the number and quality of dwellings primarily on brownfield locations, to support growth in the gateway and relieve housing pressures, both in the Gateway and outside
- A sustained increase in the quality of life for communities throughout the Gateway, through increased community cohesion, safe, vibrant, thriving town centres and open spaces that provide focal points for local communities, and improved equality and better social outcomes for the Gateway.
- The Thames Gateway Parklands programme, providing the context for a network of accessible, high-quality and sustainable landscapes and waterways, which capitalise on existing natural, built, historic and cultural assets, to support their conservation, enhancement and on-going use, and boost the Gateway’s

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1 Thames Gateway Delivery Plan November 2007 p.17
rich bio-diversity assets, strengthen character and identity, transforming perceptions and making it a great place to live, work and invest.

- A showcase of ambitious environmental interventions, across the board. The Gateway will be an exemplar low carbon region, playing a strong role in combating the impact of climate change. The efficient use of water and wastewater will be maximised, and flood risk will be effectively managed. Construction waste will be minimised.

The Delivery Plan commits CLG to commission CABE to do a further Housing Audit in the Gateway in 2010 to measure progress in improving design quality.

### 2.2 CABE’s work in the Thames Gateway

CABE put forward a proposal to help TGSP and local authorities achieve their three commitments. The proposition was set out in a Service Level Agreement. The main aims of which were to:

- Build and develop the coherent vision for the identity of the Thames Gateway in order to facilitate identity and place-making here.
- Raise design standards across the Gateway by raising aspirations, competency and skills in making decisions on design issues, managing the design process and facilitating a consistently high standard of design through the development of a design pact between partners.

### 2.3 Purpose of the Thames Gateway assessment

As part of the CABE-CLG service level agreement, in September 2007 CABE committed to undertake an assessment of housing planning applications across the Thames Gateway. The purpose of the assessment was to provide CABE with an early indicator of whether an audit of completed housing schemes in 2010 will meet CLG’s aspirations for improved quality. It was anticipated that the exercise would also provide evidence of the quality of planning decisions within each Local Planning Authority (LPA) in the Thames Gateway and an understanding of the level of competency in making decisions about design quality.

### 2.4 Objectives of the assessment

The main objectives set out for this piece of work were to:

- Provide an early indicator of whether an audit of completed housing schemes in 2010 will meet CLG’s aspirations for improved quality
- Evidence of the quality of planning decisions in each LPA and an understanding of the level of competency in making decisions about design quality
- Enable CABE to make recommendations to CLG and TGSP about issues to address to establish a consistent approach to decision making at planning application stage
2.5 Approach to the Thames Gateway assessment

CABE committed to use the Building for Life (BfL) standard to assess a sample of between 30-60 residential development schemes at RIBA stage D that had been granted planning permission within the previous two years. Local authorities were asked for a list of large planning applications that met the timescale and the data requirements for a BfL assessment. Up to four schemes were selected at random from each authority. Where local authorities did not provide a sufficient number of suitable schemes, the number of assessed schemes was reduced in that authority. In total a sample of 41 schemes were assessed from the pool of 155, therefore 26.5% of the sample pool were assessed.

The assessments were carried out by CABE enablers/accredited BfL assessors in order to ensure a high standard of evaluation. Emphasis was also placed on reviewing the quality of assessments. Two assessors were assigned to each authority and visited every site that was assessed. Each assessor carried out a full assessment of half the submissions; they then swapped the results to carry out a moderation check to ensure consistency of approach.

The assessments were based on the planning application material supplied by the authority using all 20 BfL questions. Where there was no information or it was of insufficient quality to answer a question it was scored with zero. Therefore, if the application material did not provide the required information to make the assessment, the scheme would be penalised. Any scheme that failed to address any of the criteria by its nature or type was also scored zero.

A pro forma of additional questions was completed by the authority and assessor to provide a broader picture of planning and design issues specific to the scheme, this information in part informed the issues chapter of this report. A summary spreadsheet was prepared for each scheme, and a feedback meeting arranged with each authority to discuss the findings of their assessed schemes and learn about their internal design process. At the meeting the planning background and design of each of the schemes was explored. In some cases, where requested, a separate BfL awareness training event was also provided by CABE for officers in the authority.

The assessment differs from previous national audits carried out by CABE in that:

- Evaluations were from planning application material only. When site visits were carried out some schemes were in the process of being built or had been
completed. Where this occurred the audit was still based on the planning application material
- CABE enablers/BfL accredited assessors carried out the evaluations, rather than trained research surveyors
- All BfL criteria were assessed on all schemes (as with the national affordable housing survey).
- Follow up meetings were arranged with each authority to share findings, and in some cases carry out BfL awareness training
- It was intended as a snap shot of the potential current standards being met in order to gain an idea of whether audited schemes in 2010 will meet CLG’s aspirations for high quality design in the Gateway

2.6 Building for Life

BfL is recognised by Government as an indicator of design quality and since 2008 it has been recommended for use in local authority Annual Monitoring Returns (AMR) as a housing quality indicator (H6). The standard is also promoted for use throughout the development process as a means of setting out clear expectations and giving certainty about the approach taken to the design agenda. It can be used for setting clear standards at the outset of the development within development briefs; for structuring design and access statements around its core criteria; and increasingly authorities are using it to guide pre application discussions. In this way the fundamental development principles can be agreed away from a debate over style.

A BfL assessment consists of 20 criteria that can be scored as 0, 0.5 or 1. The scores are awarded according to the following guide:

- **Score of 1** – Awarded where there is sufficient evidence that the proposed design will meet the criterion.
- **Score of 0.5** – Awarded where there are specific areas where the proposed design performs well against the criterion but there are also others where it fails to do so.
- **Score of 0** - Awarded where it is unclear whether the proposed design will meet the criterion or if there is certainty it will fail to meet the criterion.

The assessment is split into four sections: character; roads, parking and pedestrianisation; design and construction; and environment and community. This structure is based on the previous BfL layout, it has since been updated.

A complete assessment is graded as very good (16-20 / > 80%), good (14-15.5 / 70% - 79%), average (10-13.5 / 50% - 70%) or poor (0-9.5 / <50%). Each description corresponds as follows:

- **Very good** – of a standard which would merit a BfL Gold Standard award, which is given to exemplary schemes.
- **Good** – of a standard that would merit a BfL Silver Standard award. This is the baseline for good design, which every scheme should achieve, and which the government has recognised in its interim Thames Gateway plan.
• **Average** – of a standard that would not merit a BfL award, and a wasted opportunity to generate value and create sustainable places.

• **Poor** – meeting less than half of the criteria that characterise a good development, as set out in PPS3. These schemes are not, in our view, good enough to have been granted planning permission.
3. Findings

The overall findings from the Thames Gateway planning application assessments are shown in Figure 1.

Figure 1: Findings from the Thames Gateway assessment

These results raise a few positive notes but overwhelmingly worrying issues for house builders as well as significant challenges for the Thames Gateway Strategic Partnership, local and central government. Planned development throughout the Gateway will need to make a higher contribution to the design quality of new neighbourhoods if the design aspirations for the region are to be met.

Overall 22 per cent of schemes were classed as good or very good, and therefore potentially worthy of a BfL award. These schemes demonstrate what can be achieved within what are often the same regulatory and market conditions. The proportion of schemes scoring good or very good is a similar outcome to CABE’s national housing audit. The main disparities were with the poor and average schemes. The Thames Gateway assessment presented a higher proportion of poor schemes and a smaller proportion of average schemes compared to the national audit.

65.9 per cent of schemes were granted permission within two years of PPS1 coming into effect, although some schemes were conceived as part of a larger development which had gained outline consent before PPS1 and PPS3.
Figure 2: Results for London Thames Gateway and Kent and Essex Thames Gateway

Assessed schemes within London Thames Gateway
(The total sample London Thames Gateway is 18)

Very good: 17 per cent reaching an overall score of 80 per cent or more
Good: 22 per cent reaching an overall score of 70-79 per cent
Average: 28 per cent reaching an overall score of 50-69 per cent
Poor: 33 per cent reaching an overall score of less than 50 per cent

Assessed schemes in Kent and Essex Thames Gateway
(The total sample for Kent and Essex Thames Gateway is 23)

Very good: 4 per cent reaching an overall score of 80 per cent or more
Good: 4 per cent reaching an overall score of 70-79 per cent
Average: 48 per cent reaching an overall score of 50-69 per cent
Poor: 44 per cent reaching an overall score of less than 50 per cent

Figure 2 indicates that there is a disparity in the quality of schemes between the London Thames Gateway and Kent and Essex Thames Gateway areas. The number of good and very good schemes is greater from the sample that fall within the London Thames Gateway (LTG) area compared to those in the outlying Thames Gateway area. In fact only one in each category (good and very good) occurs outside the London Thames Gateway. The proportion of poor and average schemes is far higher in the outlying Gateway area. There may be a number of planning and economic conditions in the London Thames Gateway that could account for this, including tighter planning design policy, the London Plan, greater regional design resources as well as potentially higher land values within the London region.

The polarisation of good and poor schemes is similar to the national picture shown in CABE’s national housing audits². The national picture showed ‘average’ accounting for at least half of the schemes. Precisely why there is a large number of poor schemes in the Thames Gateway can only be surmised from the evidence, although some of the factors contributing to the pattern of more successful schemes are explored in the following section. The number of good schemes demonstrates that good quality housing design is being achieved but it is not the norm. The challenge is to develop the culture, tools, and strategic framework across the Thames Gateway so that the commitment to quality which underpins the best schemes can be applied across the board.

² CABE Housing audit 2007 & CABE Housing audit 2004
Figures 3 and 4 present the average score for each of the 20 criteria for the top 10 and bottom 10 performing schemes of the Thames Gateway assessment. The weakest area for both ranges of schemes was design and construction. For both the top ten and bottom ten scoring schemes the assessments performed poorly for question 14 ‘has the scheme made use of advances in construction or technology that enhances its performance, quality or attractiveness’. Other questions that scored poorly for both the top and bottom ten schemes were 13 ‘Do buildings or spaces outperform statutory minima, such as Building Regulations?’ and 15 ‘Do internal spaces and layout allow for...’
adaptation, conversion or extension?’ Given that all of the schemes were given planning permission prior to the Code for Sustainable Homes3 (CSH) requiring a mandatory rating in 2008, it would appear that little effort has been put into buildings or spaces outperforming statutory minima. In terms of the Thames Gateway region meeting targets for becoming an exemplar low carbon region, the need to address this issue is particularly relevant.

Areas that performed well include questions 16 ‘Does the development provide (or is it close to) community facilities, such as a school, parks, play areas, shops, pubs or cafes?’ and 20 ‘Does the development have any features that reduce its environmental impact?’ within the environment and community section. Both these questions scored an average of 0.8 among the bottom 10 schemes, demonstrating the strength of schemes within the Thames Gateway in relation to these criteria.

A full analysis of what differentiates the good from the poor schemes, and areas where low scoring schemes performed worse has not been carried out, but would be a useful avenue of further investigation. In the case of accommodation mix, this question was regularly marked as zero because the information was rarely provided in the application material. In several of the feedback meetings it was noted that this was often due to an assumption by the developer that the local authority had carried out studies analysing the needs of the local community and therefore they did not need to provide this information. Due to a lack of evidence presented in the planning application material 49% of schemes for question 13 ‘Do buildings or spaces outperform statutory minima, such as building regulations?’, 59% of schemes for question 14 ‘Has the scheme made use of advances in construction or technology that enhance its performance, quality and attractiveness?’ and 37% of schemes for question 17 ‘Does the development have any features that reduce its environmental impact?’ were penalised.

3 Code for Sustainable Homes DCLG 2006
4. Issues

The Thames Gateway assessment provides a much needed snapshot of existing practice in decision making at planning application stage and the quality of housing schemes submitted for planning approval. However, the overall objective of this assessment is to contribute to positive solutions to improve decision making around design quality issues at planning application stage to help LPAs to influence the quality of future schemes before they are submitted for planning. The evidence shows that achieving a target of 50 per cent of schemes scoring a good rating will involve a major step change. The following issues articulate areas that must be addressed if that change is to happen. The evidence within each issue was drawn from the evaluations and the follow up meetings with local authorities. Topics covered by the issues include leadership, creating places and design in the planning system.

4.1 Championing design quality

A significant number of the very good or good schemes were covered by either a comprehensive planning brief for the site or a masterplan. In the better performing schemes we saw that developers tend to rise to the demands made by LPAs. For example, where the design content is clearly set out and referenced to development frameworks or masterplans better quality schemes were submitted. If LPAs do not demand high standards of design, developers may not perceive a direct incentive to deliver it. Evidence from CABE’s national audit led to the conclusion that developers are able to produce good quality schemes when it is required of them, but will revert to poorer quality where design expectations are seen to be lower. This is also borne out in the Thames Gateway assessment and the expectations for quality need to inform all development whether large or small. The responsibility for ensuring good quality development lies with both developers and local authorities.

Where a scheme is not covered by a Development Plan Document due to its location or the size of the site, it is important that the design team and the local authority have the skills to respond to the context of the site. There are many complex issues involved in the redevelopment of brownfield sites that need to be appropriately addressed by the local authority and design team. It is essential that the design team have the capability to deliver a bespoke scheme. It is also important that the local authority team have the design skills and confidence to demand this of their smaller sites or sites that are not covered by site specific DPDs.

In several authorities there appeared to be a conflict in aspirations between the planning team and the councillors, particularly in relation to innovative design and environmental technology. These have led to members refusing applications recommended by an officer. Differences of opinion tended to focus on architectural detail and facades rather than urban design issues. Involving councillors early on in the design process with applicants is one way of dealing with this so that agreement can be reached at an early stage on the approach being taken to urban design, architecture and landscape. BfL is also proving to be a useful tool for reaching

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4 CABE Housing audit 2004
consensus on the merit of the design approaches being taken rather than a debate on architectural style.

Although the assessment was carried out on planning applications, in some cases the schemes had been built or part built. This allowed the assessor to compare the plans with what was being built on the ground. We found through follow up discussions that it was not the norm for planning officers to have visited built schemes they were involved with and that schemes were not always built to the original application standard. It raised the question: “Are there the skills and resources to enforce the original design?” As well as “How can authorities lead on improving quality if they are not intimately involved with reviewing built development?” It also raised a number of issues set out below:

- Planning committee members often do not see built schemes
- 39% of schemes were rated poor and should not have been granted consent, as a consequence there needs to be an awareness of what these schemes look like and how application drawings compare to schemes delivered on the ground
- Quality of submitted material is often insufficient to make a full BfL evaluation – the system is not set up to assess the quality of the material submitted

Our feedback meetings with authorities revealed a lack of confidence to refuse applications on design grounds as it is often seen as unsuccessful, and felt likely to be overturned at appeal. In several cases authorities had direct experience of refusing schemes on design grounds followed by the decision being overturned by the Planning Inspectorate at appeal. It is important that the authorities do not use this as a reason to accept poor design. CABE are working with the inspectorate to increase their awareness and understanding of BfL while building a catalogue of case studies where design grounds have been successfully supported at appeal. This programme coupled with an effective use of BfL will help local planning authorities to defend refusals on design grounds at appeal.

Many of these issues regarding lack of leadership in local authorities need to be taken in light of what is often a context of poor developer interest and low land values. Many of the local authorities cited this as a likely reason for poor quality, and stated that they struggle to attract developers. They are often reluctant to have briefs that make demands on sites in terms of setting standards and good design which might deter applicants in the first place.

4.2 Understand the scale of opportunity

Promoting an awareness of a local or Thames Gateway identity and environmental sustainability issues such as energy efficiency, water conservation, flood risk or green space strategies was rare in the schemes assessed. It is legitimate and essential for good design to be part of the specification of masterplans and development briefs. Often setting the context for development was overlooked in favour of focusing on detailed considerations, and the bigger picture seldom considered. Raising aspirations which cover a commitment to the regional environmental framework, culture and place making, as well as the structure of the new and existing place, mix of uses and open
space networks needs to be clearly stated in masterplans, supplementary planning documents (SPDs) and briefs guiding development. These documents also need to give a sound policy footing for good design.

In some cases the schemes reviewed were part of a larger development either developed as phases or which had subsequently been sold to different developers. For larger developments we saw that where there was no design framework or masterplan in place there was little commitment from both developer and authority to ensure that development phases were well integrated and related to one another. This was particularly characteristic of larger schemes where the result was isolated layouts, often with little or no social infrastructure provided in early phases. As a result these schemes typically scored poorly on criteria 16 ‘Does the development have easy access to public transport?’ and 19 ‘Is there an accommodation mix that reflects the needs and aspirations of the local community?’ in the environment and community section.

House builders and authorities need to be clear about what is being delivered by all parties particularly in relation to phased development and social infrastructure. Some of the assessments found that communities were isolated due to a reliance on the delivery of following phases for amenities and infrastructure. The value of local services and infrastructure for the community and the individual buyer needs to be protected throughout the life of a project. Leaving provision of community facilities until last will not make a successful neighbourhood and will make locations less attractive to buyers.

A common feature of the average and poor schemes was the sense that they could have been anywhere. This is not an indictment on the use of standardised housing but that the characteristics of existing settlements, the individuality of a site, its location, topography, and surroundings are ignored. Officers observed that many applicants have basic site plans and drawings that are modified and submitted for different schemes, there is little surprise that schemes scored poorly in these circumstances. These schemes tended to overlook potential design and sustainability opportunities presented by the original site. Therefore a standardised approach can waste opportunities to add value to a scheme as well as meet the design and ecological aspirations for the Thames Gateway region.

4.3 Policy and guidance

All but one very good scheme was within an inner London authority. The conditions, policies and processes that are delivering better design need to be strengthened in outer London areas so that developers perform equally well across the region. The presence of urban design frameworks, masterplans and site briefs guided the housing development sites, established key design principles, and delivered the best applications. Although not studied in detail as part of the evaluations, reference was also made in some of the feedback meetings to the Unitary Development Plan (UDP) planning policies on housing and design, policies contained in an emerging Core Strategy Development Plan Document (DPD), housing needs surveys, housing investment frameworks, as well as the requirements of the London Plan in relation to housing design standards such as Lifetime Homes and BREEAM. It is vital that Councils ensure their policies are correct and consistent on design issues. Local
development frameworks and supplementary planning guidance need to be clear on how they want to attract high quality development and be consistent across all policy documents.

It emerged that County design guides such as the Essex and Kent Design Guides are often not being used by local authorities in the Thames Gateway. The most common reasons given were that they are not relevant to the character of the borough, and guidance was too all encompassing. This highlights that many of the local authorities were very aware of their own distinct character and wanted this to inform their plans. The aspiration for local distinctiveness needs to manifest in sub-regional or if appropriate local design guidance. Local design guidance can be used to highlight local distinctiveness, landscape, heritage and environmental conditions that can help to make new development distinct and enhance existing places.

4.4 Design review and internal design resource

Some of the schemes reviewed had been to regional or national design review panels, though the impact of the review panel varied between schemes. Local authorities have been advised to consult CABE on schemes of national significance. In a letter sent to all local planning authorities in December 2006, the government’s chief planning officer encouraged local authorities ‘to consult CABE as early as possible on schemes that are significant in some way’. The same letter sent out conditions for consulting regional design review panels for regionally significant schemes. Regional panels support local and regional understanding of the value of good design and increase the capacity for good quality design review.

It is essential that local authorities consult design review panels early enough in the per-application process that they are able to have an impact on the design process. Both regional and national panels need to be involved early on so that their recommendations can be appropriately considered by the local authority and the developer and their design team.

Where authorities have a design team or urban design resource, officers commented that it had proved beneficial to use that resource in the form of urban design workshops. Such workshops were used in three authorities and gave an opportunity to take a holistic view of a scheme and provide officers with formal comments based on the expertise of a range of officers. The workshops took different forms and were considered to be quicker than the design review process. Planning officers and team leaders attended; they were run by an in house urban designer; or by an architectural consultant. Using limited resources in this way may prove to be useful for other authorities. BfL is a good way of structuring these evaluations and a valuable means of establishing key messages to developers at an early stage: offering more predictability and clarity about how they should address the design quality issues.

4.5 Setting the right design and environmental sustainability standards

The lowest scoring section of the Building for Life criteria was design and construction. This was particularly evident in urban apartment schemes where the approach to size,
internal layout and corridors was outdated. Perpetuating mistakes of the past by granting permission to schemes with narrow internal corridors, shared kitchen and living rooms and internal kitchens with no natural lighting and multiple entrances will only serve to create severe social problems. Recognising that these issues are not being picked up needs to be addressed urgently by ensuring the right skills are used to evaluate schemes either in house, by seeking specialist advice or by submitting schemes to the national or regional design review panels.

Under this Design and Construction section, schemes consistently scored poorly against the delivery of sustainable dwellings in terms of making use of advances in technology, adaptability, performance and quality. Many local authorities felt they did not have the skills to set out standards, comment on applications or to influence developers about construction technologies and certain building standards.

Interestingly the assessed schemes covered by the London Plan (having the requirement amongst others that Lifetime Homes Standards be met) had the highest proportion of good and very good scores as well as the highest scores in the design and construction criteria. CSH may well prove to be effective in improving the situation outside of London, once it is fully embedded in the planning system; as all but one of the assessed schemes were granted permission prior to publication of that policy. However clearly laying out the quality standards required relating to design and construction, as the London Plan does, has a positive effect and might be considered for the whole Gateway. The Code may also prove to be an effective tool in addressing building sustainability, but will not in itself address aspects of creating a sustainable environment aspired to in the Thames Gateway Delivery Plan5 and New Things Happen6.

4.6 Developers valuing good design

The schemes that scored 16 and above (very good category) all demonstrated an appropriate and well considered design approach and created a bespoke layout and response to the site. They were also distinctive in that they had comprehensive and well considered design and access statements which fully encompassed the wider context of development. Many developers are missing the opportunities to create value and distinctiveness and are failing to exploit their schemes' surroundings and fit the local context, as well as contributing to a local identity or creating a distinct character. It is vital that developers are encouraged to take a long term stake in development and are supported to invest in quality. They also need to recognise the advantages of investing in the appropriate skills and design training and the need to build an awareness of national quality standards such as BfL.

Although the Thames Gateway assessment revealed some examples of excellent practice, on the whole both the local authorities and assessors complained of weak design and access statements. Poor presentation, lack of required information and little justification of the design approach were common criticisms. Developers are failing to make the most of an opportunity to a smooth path to approval, as highlighted

5 Thames Gateway Delivery Plan November 2007
6 New Things Happen CABE 2006
above, the assessment showed that the best schemes were accompanied by good
design and access statements. Statements that include a clear design rationale,
provide evidence of the thought process behind the design and illustrate how the
specific characteristics of the site had been responded to, were held up as the best
examples. Local authorities need to promote the need for better quality statements.

4.7 Building for Life

Awareness of BfL appears to be growing throughout the Thames Gateway and some
of the authorities we talked to are beginning to use it as part of the planning process.
In some cases it is being used as part of pre application discussions, but it is not
widely used at the moment to evaluate planning submissions as an indicator of design
quality. More training and promotion is needed, as well as work to be done with the
planning inspectorate. It has the potential to be linked to planning policy and CABE is
increasingly seeing BfL being adopted by local planning authorities elsewhere as a
negotiating and performance measurement tool. Several Thames Gateway authorities
are currently referring to the BfL standard in their core strategies.

Both the BfL assessments and the feedback meetings demonstrated the value of using
BfL throughout the planning application process and especially at the pre-application
stage. During the feedback meetings, discussions were framed around the BfL
assessments and criteria. This encouraged debate and reflection on issues which
would not necessarily come up in pre-application discussions. CABE recommended
that LPAs should use BfL to structure their pre-application meetings for larger
residential schemes and request that the applicant comes to the meetings with
prepared answers to the questions. It was considered that this approach would help
remove the ambiguities of design issues and enable focused discussions between
planning authority and applicant.

CABE promotes non-regulatory approaches to dialogue about design in the planning
system and public procurement and Building for Life is an excellent tool for this.
Using Building for Life in policy, negotiation, to set standards in development briefs
and masterplans, as a means of collecting an evidence base for planning decisions,
and as performance measurement tool, should all be considered by the Planning
Authorities. Furthermore, BfL is an umbrella for national policy and guidance and can
therefore be used as an effective way to structure an evidence base of design issues
when defending a decision at appeal.
5. CABE’s Recommendations to CLG and HCA

The Thames Gateway assessment shows that the quality of development being delivered in the Gateway falls short of the government’s ambition of ‘quality’ housing growth in the region\(^7\). Development is also failing to contribute to the ‘bigger picture’ in terms of the vision for the future Gateway as an ‘exemplar low carbon, eco region’.\(^8\) Problems of poor estate layout, over engineered highways, dominant parking, poor amenity spaces and lack of connectivity and local facilities are common features, added to which is a picture of homes with small rooms, long narrow corridors and weak environmental sustainability strategies. The recommendations made below are developed out of CABE’s work on the Thames Gateway assessment and are considered necessary actions if 100% of schemes are to score good or very good by 2015.

The following recommendations are based on CABE’s wider engagement in the Gateway and seek to take forward and assist in delivering CLG’s aspirations for the region. The recommendations are made under five headings:

- Develop a gateway wide strategic approach through the development of a planning charter
- Increase design and sustainability skills in the gateway
- Local authority leadership
- A coordinated approach from governmental organisations
- The value of policy and guidance.

5.1 A strategic planning approach is fundamental to the successful delivery of the Thames Gateway vision.

- The Thames Gateway assessment has shown that there needs to be a more systematic approach to planning application decisions to place the Thames Gateway in a competitive position by achieving well designed housing schemes;
- Feedback from the consultation on the design pact asked for greater consistency and clarity across the Gateway about what is expected and how this can be achieved through the planning system;
- Central government should continue to support and invest in the Thames Gateway by supporting HCA to take forward the design pact, which CABE consulted key stakeholders on in 2008;
- A planning charter could create a more consistent approach to development throughout the Thames Gateway for local authorities, developers and other organisations involved in housing delivery;

\(^7\) Hazel Blears Thames Gateway Strategic Partnership Meeting  July 2008
\(^8\) Thames Gateway Delivery Plan 2007
New schemes must be designed to sit within the site context and the wider Thames Gateway context. All development projects should be informed by a strong strategic design approach, so that every project can contribute to the vision for the Gateway and add value to local identity;

‘New Things Happen: A Guide to the Future Thames Gateway’ is a simple guide that can be used to locate and identify where and how new development can contribute to the vision for the Gateway.

5.2 There needs to be the necessary capacity and skills in all local planning authorities throughout the Thames Gateway to support both the planned growth and the delivery of advances in design and sustainability techniques in line with the aspirations for the Gateway.

- Where a local authority does not have a design resource, what funding streams could be set aside to employ an urban designer or someone with architectural experience to support existing teams to steer development and new communities in the future?

- Some local authorities have been using their design resources to run design workshops for planning officers. This helps to raise design issues and increase officer confidence to raise design issues in pre-application meetings;

- The skills gap relating to the design, construction, internal layout, and sustainable construction of homes needs to be narrowed by authorities. Officers need to be able to both champion these aspects as well as to accurately assess the proposals that they are presented with;

- It is essential that enforcement teams have the skills and capacity to strictly examine sites and ensure that they appropriately correspond with the submitted plans;

- Councillors need to undergo urban design training so they can examine schemes appropriately when making committee decisions. We encourage LPAs to take their Planning Committee Members on site visits as part of Member training to show them good and poor schemes alongside the application material submitted with the schemes and use BfL to aid dialogue about the quality of schemes.

5.3 Local authorities must take the lead on setting the design and placemaking agenda.

- The economic downturn is putting more pressure on Thames Gateway local planning authorities, nevertheless the general slowdown provides opportunity for local authorities to take the lead on design and placemaking.
Local authorities need to ensure that the apparatus is in place to secure the delivery of quality places in the future;

- A pro-active response to this challenge is required. CLG need to encourage LAs to retain their skilled staff and encourage councils to undertake or commission planning and site briefs or through up-skilling staff to deal with the demands of future development;

- Housing applications are failing to meet many design quality standards and training needs to focus on specific skills - typically urban design, construction techniques and internal layout, and environmental technology relating to housing;

- Local authorities demonstrate leadership on design quality by setting out clearly what is required of developers. This may be through design DPDs such as local character studies or by employing design skills in the council. Where local authorities were clear about their design quality expectations, they found that developers would improve their offer. It was also noted that DPDs could be used as a point of negotiation with a developer, helping to secure certain design and sustainability standards;

- Placemaking is not only important for new communities but also for existing communities in the Thames Gateway. It is important that local authorities ensure that maximum benefit is delivered to existing communities from the expected growth in the Gateway.

5.4 There needs to be appropriately coordinated support to Local Planning Authorities across national, reginal and sub-regional advisory organisations working in the Thames Gateway.

- There needs to be a better co-ordinated offer of direct support around design and planning issues. It is necessary to bolster capacity in local planning authorities to deal with larger and complex applications.

- Regional design review panels should seek to help local authorities in the technical areas where they are weakest. The Thames Gateway assessment showed that local authorities performed badly against advances in construction technology, reducing the environmental impact of the scheme and outperforming building regulations. Design review panels should utilise people with expertise in these areas to advise local authorities on large applications.

- Continue to carry out design awareness training for the Planning Inspectorate
5.5 LPAs need to use policies and guidance to enhance and protect existing environmental, built and cultural assets.

- Local authorities can use character appraisals or local design guidance to influence new development and bring benefits to existing communities.

- Much better quality design and access statements need to be produced. In particular evidence should be provided on the thought process behind the design and layout of the scheme.

- Design and access statements that clearly demonstrate and explain how schemes deal with Building for Life criteria will help with a smoother path to approval.

- BfL should be used to assess schemes at the pre-application stage, providing an objective assessment of a scheme and a framework for raising urban design and sustainability issues.

- BfL could be adopted by all local authorities in the Gateway to increase consistency in pre-application discussions, information requested for an application, scheme reviews and internal and external communication for the local authority.

- Awareness of Building for Life as the Government’s national standard for housing needs to be built up across the region, to a point where authorities are using it on a day to day basis to help drive standards up. Government need to make it clear that this will be the standard used to inform future audits.
### Annex 1 – Assessed schemes and scores

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<th>Approval date</th>
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