



HOUSING SUPPLEMENTARY PLANNING GUIDANCE

MARCH 2016

**LONDON PLAN 2016
IMPLEMENTATION FRAMEWORK**

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FOREWORD



Providing a choice of decent homes at prices Londoners can afford is arguably the greatest challenge facing the capital today. London continues to drive economic growth in the UK and around a quarter of new jobs being created are based in the capital. But unrivalled economic success means accommodating a growing population.

To keep pace with rapid population growth, we must massively increase the number of new homes being built. My 2015 London Plan responds to this challenge by planning to deliver at least 49,000 extra homes a year.

Delivering this number of additional homes will not be an easy task. It requires doubling the current rate of housing delivery and maintaining that rate for the next twenty years. To make this happen, we must all work together and recognise that we cannot assume someone else will sort out London's housing problems. Government, the Mayor, the private sector, the boroughs and the voluntary sector must engage constructively and play their part in bringing forward housing provision.

To help this happen this guidance seeks to clarify the world of viability appraisals and appropriate land values. Of course, developments must be viable to be delivered, but the process needs to be clearer and more transparent for communities. Land owners and developers must take account of policy requirements when coming to a view on the price of land just as boroughs must assess the impacts of policy on the deliverability of sites.

And it is not just about delivering housing numbers. The type and tenure of new housing is equally important. London urgently requires more affordable homes and more private homes that meet the needs of people on a range of incomes, all built to a decent standard. Drawing on my recently revised London Plan this SPG encourages all the players in the housing market to think innovatively about how different housing models such as purpose built long term private rent and the range of intermediate housing options can meet need and accelerate delivery.

We must also ensure we have housing that meets people's needs throughout their lives.

As Londoners continue to live longer, the number of homes suitable for older people must be increased substantially. Housing provision will also need to address growth in smaller households; as well as meet the continued demand for larger family homes.

The challenge of accelerated housing delivery cannot be met at the expense of housing quality. In fact, the scale of growth to be accommodated in London underlines the importance of securing well-designed new housing. It reinforces the need for new development to provide accessible, adaptable and attractive homes and neighbourhoods that stand the test of time.



Boris Johnson
Mayor of London



INTRODUCTION

- 0.1.1 This Supplementary Planning Guidance (SPG) provides guidance on the implementation of housing policies in the 2015 London Plan¹ and the 2016 Minor Alterations to the Plan (MALP). It replaces the 2012 Housing SPG.
- 0.1.2 This SPG was developed at a time of significant change in the national approach to housing and planning. The Housing and Planning Bill, currently making its way through the legislative process, has significant implications for how we plan for affordable housing in London. Therefore, other than a section dealing with viability, the majority of the Affordable Housing Chapter consulted on remains as draft and is not included in this final version. It is likely that further guidance or advice on affordable housing will be required once more detail is known about the Government's approach and its implications for London.

The structure of this document

0.1.3 The SPG is divided into seven parts:

- **Part 1 covers housing supply** - this provides new guidance to Local Planning Authorities (LPAs) on achieving and exceeding minimum housing targets and advises on potential sources of additional housing capacity. It also sets out the Plan's approach to optimising housing output and advises on the application of the Sustainable Residential Quality (SRQ) density matrix.
- **Part 2 covers housing quality** – this updates London housing standards to reflect the implementation of the Government's new national technical standards through the MALP. Some amendments have also been made to the standards not affected by the new national standards to improve clarity, implementation and alignment with other Mayoral guidance.
- **Part 3 covers housing choice** – this provides guidance to LPAs undertaking sub-regional and local housing need assessments. It reflects strategic evidence on housing need² and address changes to Policy 3.8 in the 2015 London Plan in terms of specialist housing for older people, students and build to rent. The guidance on Policy 3.9, mixed and balanced communities, remains as draft and therefore has not been included.
- **Part 4 covers viability appraisals** – this provides guidance on the Mayor's preferred approach to viability appraisals. The remainder of the affordable housing chapter remains as draft and has not been included in this document.
- **Part 5 covers investment and existing housing stock** – this provides advice on bringing empty homes back into use and the net loss of housing through redevelopment. Guidance is also provided on aligning local and strategic investment programmes to enable anticipated housing growth.
- **Part 6 covers social infrastructure** – this section focuses on the enabling role of housing in facilitating new infrastructure provision through mixed use

¹ Mayor of London. The London Plan. Spatial Development Strategy for Greater London. GLA, 2015

² Mayor of London, 2013 Strategic Housing Market Assessment (SHMA), GLA, 2014

development, particularly in opportunity areas, town centres and on large sites. Broader guidance on social infrastructure can be found in the Mayor's Social Infrastructure SPG

- **Part 7 covers mixed use and large developments** - this provides guidance on residential and mixed use development in town centres, opportunity areas, large sites and housing zones. Guidance is also provided on the London Plan's office and mixed use development policy and the management of industrial land.
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PART 1:

SUPPLY

- 1.0.1 This part of the SPG provides guidance on the strategic approach to increasing housing supply set out in London Plan Policies 3.3 and 3.4. Policy 3.3 is designed to address London's need for 49,000 new homes a year by drawing on two sets of policies. One is based on 'traditional' provision targets derived from the London SHLAA (42,000). The other addresses the balance of need by drawing together a range of new policies to encourage higher density, housing led, mixed use development in accessible locations in Opportunity/Intensification Areas, town centres, surplus industrial land and other large sites. Sensitivity testing during the SHLAA showed that these sources could 'fill' the gap between the minimum housing supply target and identified need. London's average level of approvals over the last decade (more than 50,000 conventional homes pa) and the scale of its net approvals pipeline (260,000) suggests that there is capacity for at least 49,000 homes a year, and more if approvals for non-conventional dwellings are included.
- 1.0.2 The first section of this SPG focuses on Policy 3.3 and the use of minimum targets in Table 3.1 of the London Plan and relates this to national planning policy, Local Plan preparation and borough housing trajectories. Guidance is provided to boroughs on how they should seek to achieve and exceed minimum housing targets in order to address local and strategic housing need and ensure general conformity with the London Plan. This leads into advice on realising the housing potential of different sources of development capacity. The second section provides guidance on the London Plan Policy 3.4 - optimising housing potential

1.1 THE STRATEGIC APPROACH TO HOUSING TARGETS

- 1.1.1 Coming to a view on the level of future housing provision required across London, the Mayor took account of housing need; the requirements of national planning policy; the issues entailed in applying this in the unique circumstances of London; and the need to ensure boroughs can deliver against these requirements in light of local circumstances. To help address London's objectively assessed need for 48,840 new homes a year³, the Mayor has published minimum housing provision targets. These are soundly based on the principles of sustainable development, realistic and developed in partnership with boroughs through the London Strategic Housing Land Availability Assessment⁴. Minimum targets provide a robust starting point for the development of local policies and for taking forward the intent of the National Planning Policy Framework (NPPF).
- 1.1.2 The Mayor considers that in a city as large and complex as London, with a single housing market and a unique two tier planning system, it is important to coordinate housing delivery to meet need using minimum housing targets, together with other policy mechanisms. A strategically coordinated SHLAA undertaken on the basis of a consistent pan-London methodology provides

³ Mayor of London, The 2013 London Strategic Housing Market Assessment

⁴ Mayor of London, The London Strategic Land Availability Assessment (SHLAA) 2013

an equitable and locally sensitive framework to identify housing capacity. This approach reflects advice in the National Planning Practice Guidance (NPPG)⁵ which recommends housing supply should be assessed consistently across a housing market area and involve authorities working together, in line with the duty to cooperate. The Mayor is also mindful that SHLAAs are expensive to prepare but that carrying out a strategically coordinated capacity assessment represents a prudent use of public resources where the results can be substantially robust for use at local level in Local Plans.

Use of targets in Local Plans

1.1.3 The targets in Table 1.1 are designed to provide an authoritative and convenient starting point for the development of local housing targets, with proportionate updating and refinement at borough level. Together with the SHLAA and its supporting independent viability assessment⁶, targets have been subject to an Examination in Public (EiP) and found sound in terms of their compliance with national guidance and their robustness as reliable baseline estimates of housing capacity in London. With this in mind, due weight should be afforded to targets as appropriate benchmarks on which to develop local housing policies and targets. In demonstrating that they have sought to address local and strategic need, borough Local Plans will, as a minimum, have to reflect these figures in order to be in general conformity with the London Plan. Local Plans will also need to demonstrate how a borough intends to address any gap between the targets and locally assessed housing need (see para 1.1.6).

1.1 ANNUAL AVERAGE HOUSING SUPPLY MONITORING TARGETS 2015 – 2025

BOROUGH	MINIMUM TEN YEAR TARGET 2015-2025	ANNUAL MONITORING TARGET 2015-2025
Barking and Dagenham	12,355	1,236
Barnet	23,489	2,349
Bexley	4,457	446
Brent	15,253	1,525
Bromley	6,413	641
Camden	8,892	889
City of London	1,408	141
Croydon	14,348	1,435
Ealing	12,972	1,297
Enfield	7,976	798
Greenwich	26,850	2,685
Hackney	15,988	1,599
Hammersmith and Fulham	10,312	1,031
Haringey	15,019	1,502
Harrow	5,927	593

⁵ National Planning Practice Guidance, Paragraph: 007 Reference ID: 3-007-20140306 Paragraph: 008 Reference ID: 3-008-20140306

⁶ Three Dragons, David Lock Associates and TradeRisks Ltd, 2013 GLA SHLAA Viability Assessment

BOROUGH	MINIMUM TEN YEAR TARGET 2015-2025	ANNUAL MONITORING TARGET 2015-2025
Havering	11,701	1,170
Hillingdon	5,593	559
Hounslow	8,222	822
Islington	12,641	1,264
Kensington and Chelsea	7,330	733
Kingston upon Thames	6,434	643
Lambeth	15,594	1,559
Lewisham	13,847	1,385
LLDC	14,711	1,471
Merton	4,107	411
Newham	19,945	1,994
Redbridge	11,232	1,123
Richmond upon Thames	3,150	315
Southwark	27,362	2,736
Sutton	3,626	363
Tower Hamlets	39,314	3,931
Waltham Forest	8,620	862
Wandsworth	18,123	1,812
Westminster	10,677	1,068
London total	423,887	42,389

Source: Table 3.1 London Plan 2015

Reconciling local and strategic housing need

- 1.1.4 Whilst the need for boroughs to seek to ‘achieve and exceed’ minimum targets is an established principle of the London Plan (Policy 3.3D), changes through the Further Alterations to the London Plan (FALP) reinforce the requirement for boroughs to demonstrate they have sought to ‘augment’ minimum targets to close the gap between identified housing need and supply. This follows the emphasis of the NPPF to positively seek opportunities to meet housing need and secure sustainable development⁷.
- 1.1.5 At a strategic level, changes to Policy 3.3 aim to close the gap between London’s housing need (48,840 pa) and identified housing capacity (42,390 pa). On a pan-London basis this equates to a potential ‘gap’ of 6,450 new homes each year (13% of need). At a local level, a large number of boroughs are expected to exhibit shortfalls between identified housing capacity and housing need, with particularly acute issues of potential undersupply in outer London and in the south, west and north London sub-regions⁸. Local and/or sub-regional SHMAs will provide further detail on the level of housing need on a more local basis and should inform local housing provision targets and monitoring (Policy 3.3G and 3.8B). Further guidance

⁷ DCLG, NPPF, paragraph 14, 47

⁸ See Annex 1 of this SPG. Note that sub-regions are shown on Map 2.1 of the London Plan

on undertaking housing need assessments within the context of the pan London SHMA is provided in Part 3 of this SPG.

- 1.1.6 To address London's strategic housing requirement and reconcile any local disparities between housing need and supply, boroughs should identify and proactively seek to enable extra housing capacity through the preparation of their Local Plans (Policy 3.3D). In addition to meeting the minimum targets in the London Plan, boroughs should place particular emphasis on:
- ensuring Local Plans seek to meet housing requirements identified in any local and /or sub-regional need assessments; and
 - in light of London's strategic housing requirements, ensuring that all potential additional housing capacity is identified in accordance with strategic and national policy, irrespective of whether local need assessments indicate that a borough's minimum target is sufficient to meet or even exceed 'local' housing need.
- 1.1.7 Whilst taking into account other policy objectives, boroughs should ensure that all opportunities to secure sustainable housing capacity should be fully realised in order to meet London's strategic housing requirements and help close the gap between need and supply across London as a whole. The strategic approach to addressing local and strategic housing need is set out in Policy 3.8 of the London Plan. This requires boroughs to ensure their local application of Policy 3.3 takes account of housing requirements identified at a regional, sub-regional and local level.
- 1.1.8 This approach echoes the requirements of the NPPF under which planning authorities must seek to meet the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies in the Framework⁹. For planning purposes, London has been considered a single housing market area (albeit with various submarket areas which rarely correspond to local authority boundaries). This view has been accepted at consecutive London Plan EiPs and by the High Court.¹⁰

Enabling additional development capacity

- 1.1.9 Paragraph 3.19i of the London Plan underlines the need for boroughs to provide effective local contributions to help meet London's need for 49,000 homes a year by bringing forward additional sources of capacity where possible, especially from the locations set out in Policy 3.3. It highlights the need for boroughs to work collaboratively with the GLA to ensure their Local Plans and final minimum housing targets are in general conformity with the London Plan. This will necessitate boroughs to seek to address local and strategic housing requirements in line with Policy 3.3 and Policy 3.8 of the London Plan. Looking beyond the adoption

⁹ DCLG, NPPF, paragraph 47

¹⁰ Judgement of the High Court of Justice, London Boroughs -v- Mayor of London & SSCLG, Royal Courts of Justice, March 2014

of Local Plans, paragraph 3.19i sets an expectation for boroughs to work in partnership with public and private stakeholders, including the Mayor, in order to translate housing approvals into completions (Policy 3.15).

1.1.10 It is recognised that the potential for boroughs to identify and bring forward additional housing output will be affected by particular planning policy designations. In addition, the need to ensure sufficient provision is made to meet evidenced requirements for commercial and employment floorspace, together with necessary supporting infrastructure may also affect the extent to which boroughs are able to supplement minimum housing targets. These strategic policy considerations will be taken into account when assessing general conformity with the London Plan.

How should boroughs re-examine the potential for additional housing output?

1.1.11 To ensure general conformity with Policy 3.3, all boroughs will need to show in their Local Plans, housing trajectories and/or supporting evidence that they have sought to identify and bring forward extra housing capacity, above minimum housing targets. The extent to which a borough is able to bring forward additional housing capacity will depend on particular local circumstances, other strategic and national planning policy objectives and development constraints and should be supported by proportionate local evidence. This should comprise a pro-active and targeted re-appraisal of a borough's SHLAA findings in the locations outlined in para 1.1.12 and other locations boroughs consider appropriate. In undertaking this assessment boroughs should draw on the scenario tests undertaken as part of the SHLAA¹¹ and, where necessary, supplement this with more local sensitivity testing and viability analysis. The scope and level of detail required in a local capacity assessment will depend on Local Plan timescales in relation to the 2013 London SHLAA and the extent of development opportunities in a given borough. In undertaking this analysis boroughs may wish to use the reporting and scenario functions provided in the SHLAA system.

1.1.12 Further borough level assessments of housing capacity should follow the approach outlined in the London Plan¹². This sets out the strategic priority to realise additional housing output through intensification, especially where there is good public transport connectivity. Boroughs should therefore undertake a focused re-evaluation of the suitability, availability, deliverability and density of large sites in the SHLAA and seek to identify additional sites, in the following types of locations:

- areas with good existing or planned public transport connectivity (PTALs 4 and above), alongside sites with PTAL 3 scores which could support additional housing intensification and sustainable patterns of movement¹³

¹¹ Mayor of London, The London Strategic Land Availability Assessment (SHLAA) 2013, Chapter 4

¹² Mayor of London. London Plan (2015), GLA, Policies 3.3, 3.4, 3.5, 3.7, 2.13, 2.15, 2.17

¹³ When considering public transport connectivity boroughs are encouraged to make use of tools available on the Transport for London (TfL) website, which are outlined in Section 1.3 of this SPG

- opportunity areas and intensification areas (Policies 3.3Ec, 2.13)
- town centres (Policies 3.3Eb, 2.15)
- surplus industrial, commercial and public sector land (Policy 3.3Ed, 2.17)
- other large sites which are suitable for intensification and higher density development (Policies 3.3Ea, 3.4, 3.7)
- existing residential areas which are planned to accommodate additional housing intensification through an agreed programme of housing renewal (Policy 3.3Ee)

1.1.13 It should be noted that Chapter 2 and Policy 3.7 of the Plan underscore the scope for development in the first five of these types of locations to go towards the top or in justified exceptional circumstances to exceed the density levels normally associated with them.

1.1.14 When undertaking this assessment boroughs should take into account the following guidance provided below on sensitivity testing density assumptions made in the SHLAA and reconsidering the constraints affecting large sites.

Sensitivity testing density assumptions in the SHLAA

1.1.15 Policy 3.3G states that boroughs should monitor housing capacity and provision against average annual monitoring targets in Table 3.1, local need assessments and the sensitivity ranges in the SHLAA. Following national guidance¹⁴, sensitivity testing was undertaken as part of the SHLAA based on the SRQ density matrix and provides an indication of the potential extra housing capacity that exists in London, drawing on alternative, but nonetheless appropriate and realistic assumptions. Illustrative scenarios¹⁵ show that opportunity areas, town centres and other large sites could have the potential to make a greater contribution to meeting housing need than initially captured in the SHLAA.

1.1.16 Additional capacity derived from the SHLAA scenario tests has not been incorporated in minimum housing targets. The London Plan provides boroughs with the flexibility to tailor their own local approaches and reflect particular local circumstances when assessing the extent to which they are able to provide extra capacity. Changes to the London Plan through FALP, together with existing policies, require boroughs to bring forward latent housing capacity in order to exceed targets, particularly in the locations identified in Policy 3.3 and through higher density development in accessible and appropriate locations¹⁶.

1.1.17 In line with the strategic approach to optimising housing capacity (Policy 3.4), boroughs should examine the potential to increase densities to the top of the relevant SRQ density matrix range on specific sites, particularly in opportunity and

¹⁴ DCLG, NPPG, Paragraph: 017 Reference ID: 3-017-20140306

¹⁵ Mayor of London, The London Strategic Land Availability Assessment (SHLAA) 2013, Chapter 4

¹⁶ Refer to London Plan (2015), Policies 3.3, 3.4, 3.5, 3.7, 2.13, 2.15, 2.17, 4.4 and paragraphs 2.61-2.62, 2.72F, 2.85, 3.42, 4.23

intensification areas, town centres and other locations where there is good public transport accessibility. In robustly justified exceptional circumstances boroughs may identify particular locations where densities above the ranges in the SRQ matrix may be appropriate, taking into account local context, infrastructure capacity, viability and with further guidance in Section 1.3. This follows the emphasis the London Plan places on boroughs refining local approaches to implementing Policy 3.4¹⁷. It also reflects Policy 3.7 which requires large residential developments over 500 units or 5 hectares in size to be progressed through a plan-led process to encourage higher densities and coordinate necessary social, physical and green infrastructure provision.

- 1.1.18 It should be recognised that higher densities do not always have to necessitate tall buildings, particularly where a well-considered, design-led approach is taken making the most efficient use of land. Examples of residential schemes at various densities and typologies in different contexts are set out in the Outer London Commission's independent report on housing density¹⁸. Capacity estimates for locations suitable for higher density, residential led, mixed use redevelopment should reflect the potential for the vertical (stacked) mixing of land uses (eg. in town centres and opportunity areas).

Constraints affecting housing delivery

- 1.1.19 Boroughs should also fully explore whether the constraints restricting housing potential in the SHLAA can be satisfactorily mitigated and addressed over the plan period in order to enable extra housing output (eg. ownership, infrastructure, environmental constraints). This is particularly relevant in and around town centres, where a high number of sites were excluded or given a low probability for housing in the SHLAA because of multiple land ownership constraints. For more details of assumptions in the SHLAA, see the 2013 SHLAA report¹⁹. Further guidance on accommodating growth in town centres is provided in Part 7 of this SPG. A similar approach should be taken to re-assess the potential constraints affecting surplus industrial, commercial and public sector land.
- 1.1.20 Boroughs should consider potential impacts on heritage assets when assessing the potential for development in town centres and in other locations, in line with national policy and consider the potential for well-designed development to enhance the setting of heritage assets. Evidence on viability and infrastructure delivery should also be taken into account when assessing the scope to bring forward extra housing capacity to exceed minimum London Plan targets reflecting the requirement of the NPPF that plans should be deliverable. However, boroughs should explore the extent to which these delivery challenges can be overcome, working closely with the Mayor and other stakeholders.

¹⁷ Mayor of London, London Plan, GLA, 2015, paragraph 3.28

¹⁸ Maccreeanor Lavington Architects, Emily Reeves Architects, Graham Harrington. Housing Density Study. GLA, 2012

¹⁹ Mayor of London. Strategic Housing Land Availability Assessment 2013. GLA 2014

How should Local Plans enable extra housing capacity?

1.1.21 Where additional housing capacity is identified and can be delivered during plan timescales the Mayor expects this extra capacity to be facilitated through local policies or allocations and included in Local Plan targets, resulting in a local uplift to strategic minimum benchmarks (and for monitoring purposes). In line with the NPPF, boroughs may wish to identify 'broad locations' for additional housing growth, drawing on the potential sources of extra supply identified in Policy 3.3E (eg. town centres, opportunity and intensification areas) and any local capacity and sensitivity testing.

Cross-boundary issues within London

1.1.22 In bringing forward additional capacity to exceed Table 3.1 targets, boroughs should note the NPPF requirement for effective collaboration and joint working²⁰ to address 'strategic priorities'²¹ such as housing need and supply. This is particularly important considering London's substantial requirement for new housing and geographical variations in the physical capacity for housing delivery. These exist as a result of the spatial distribution of infrastructure provision, environmental constraints, and suitable and available sites.

1.1.23 In London, the Mayor's strategic roles, including producing the London Plan and the associated general conformity process ensures that a consistent pan-London approach is taken to establish the scope for boroughs to augment their minimum housing targets to close the gap between identified housing need and supply. This process takes into account the range of policies in the London Plan and supports boroughs to demonstrate they have fulfilled their duty to cooperate in terms of addressing strategic housing priorities within the context of the London Plan, even where boroughs are working to different examination timescales. The SHLAA also provides an important example of effective cross-boundary working. Further guidance on partnership working with the wider South East is provided in Section 1.2.

Rolling forward targets

1.1.24 Where a target beyond 2025 is required, boroughs should 'roll forward' and seek to exceed their annual average target in Table 3.1 in their Local Plans until these are revised through the full review of the London Plan no later than 2019/20, as set out in Policy 3.3D. This 'plan, monitor and manage' approach is essential given London's vibrant land market and its reliance on recycled land - on average, 97% of housing output in London comes from brownfield land and the majority of housing is delivered on sites currently in other uses²². The principle of rolling forward targets has been accepted by three consecutive London Plan EiPs.

²⁰ DCLG, NPPF, paragraph 178 - 182

²¹ DCLG, NPPF, paragraph 156

²² London Plan Annual Monitoring Report 11 (2013-14), Table 2.1, p12

Borough housing trajectories

- 1.1.25 To comply with the NPPF²³ borough housing trajectories must illustrate the expected rate of housing delivery over a plan period and show how a five year supply of housing will be maintained, together with an assessment of potential risks to delivery. In preparing their housing trajectories, boroughs will need to assess which 'potential' large sites from the SHLAA they consider to have a strong probability for housing development and should therefore be 'specifically identified' to reduce their dependence on windfall sites²⁴.
- 1.1.26 The pool of 'potential' large sites (0.25ha and over) assessed in the SHLAA has been kept confidential to avoid undermining existing uses or the planning decision making process. The extent to which boroughs will need to specifically identify 'potential' SHLAA sites will depend on particular local circumstances and the quantum and phasing of approved or allocated housing units in a trajectory.
- 1.1.27 Where 'potential' or allocated housing sites are specifically identified in housing trajectories boroughs should consider drawing on notional capacities in the SHLAA system to estimate housing yields, rather than rely on constrained housing capacity estimates. These will provide a more accurate reflection of the capacity of an individual site, when it does come forward for housing. In addition, boroughs should have regard to this guidance when compiling brownfield registers and identifying which 'potential' large sites in the SHLAA may be suitable for housing or 'permission in principle'.

Windfall provision

- 1.1.28 The SHLAA provides the 'compelling evidence' necessary to justify a windfall allowance for small sites based on historic trends, in line with paragraph 48 of the NPPF and reflecting the distinct circumstances in London. Windfall assumptions are based on average annual completion rates on small sites (under 0.25ha) in each borough over an eight year period (2004/5 to 2011/12). Trends show housing has been consistently delivered on small sites in the past and demonstrate robustly that this can be expected to provide a reliable source of future supply.
- 1.1.29 Average annual trends over this timescale provide a consistent and appropriately long-term basis on which to estimate future supply, not least because they cover a full market cycle and take account of the impact of the recession. Trends also reflect particular local circumstances, for example, environmental/heritage designations and urban form. These specific points, together with the overall robustness of the SHLAA's capacity estimates for small sites, were tested through an EiP and were accepted in the Planning Inspector's Report on the 2015 London Plan²⁵. However, boroughs are encouraged to re-examine the potential capacity

²³ DCLG, NPPF, paragraph 47

²⁴ Refer to DCLG, NPPF, Annex 2: Glossary – 'windfall sites'

²⁵ The Planning Inspectorate, Report to the Mayor of London by Mr A Thickett, 2014, page 10, para 36

from small sites and explore policy approaches which may lead to the delivery of more homes on small sites where consistent with the Plan, or by identifying or allocating suitable sites in plans or Brownfield /small site registers.

- 1.1.30 As paragraph 48 of the NPPF states historic windfall rates should not include residential gardens, 90% of garden land sites were removed from small site trends used in the SHLAA. The 10% was retained in recognition that the identification of garden land development in the London Development Database may include some land that is not garden land per se.²⁶
- 1.1.31 When preparing trajectories, boroughs should note that national guidance states windfall allowance may be justified in five year supply estimates, when based on 'compelling evidence'²⁷. It also suggests windfall allowance can be included in capacity assumptions for geographically defined 'broad locations' on the same evidential basis. With particular relevance to London and the principle of rolling forward 10 year London Plan housing targets, the National Planning Practice Guidance (NPPG) confirms that Local Plans can be considered sound where it is not possible to identify sites or broad locations in years 11 to 15.²⁸
- 1.1.32 Constrained housing capacity estimates for large sites in the SHLAA may be drawn on where boroughs identify 'broad locations for growth' in years 6-10 and 11-15 of a plan period, rather than specifically identify sites. Where these are used, it should be recognised that the probability based methodology on which they are derived provides a more sophisticated and authoritative way of estimating aggregate housing potential on large sites compared to traditional 'windfall'/trend based approaches, particularly given London's highly competitive and dynamic land market - a point accepted by independent panels through three London Plan Examinations in Public (EiPs). Probability estimates are based on a site specific constraints testing exercise undertaken in partnership with boroughs.

Development viability

- 1.1.33 The SHLAA was supported by an independent viability study²⁹ which established a broad understanding of viability based on a proportionate evidence base. This study was focused on an appropriate sample of sites and on areas where viability is potentially more of an issue, in line with national guidance³⁰ and advice provided by the Local Housing Delivery Group³¹. Viability testing was based on development being policy compliant in terms of affordable housing contributions,

²⁶ SHLAA, page 38

²⁷ DCLG, NPPG, Paragraph: 24 Reference ID: 3-24-20140306

²⁸ *ibid*

²⁹ Three Dragons, David Lock Associates and TradeRisks Ltd, 2013 GLA SHLAA Viability Assessment

³⁰ DCLG, NPPG, Paragraph: 005 Reference ID: 10-005-20140306, Paragraph: 006 Reference ID: 10-006-20140306

³¹ Local Housing Delivery Group. Viability Testing Local Plans –advice for planning practitioners. chaired by Sir John Harman. 2012

CIL/s106, density and the Mayor's housing standards. Boroughs are advised to augment this evidence where necessary with more detailed local assessments of viability.

Accelerating housing delivery

- 1.1.34 Identifying potential housing supply is not, on its own, enough; delivery is essential to address London's housing need. Arguably the greatest challenge the capital faces in terms of housing supply is translating the substantial pipeline of approved units (261,000) into completions. Whilst on average 62,500 units have been granted planning permission each year (2004-2013), less than half this figure – approximately 27,000 units - are delivered on average each year³².
- 1.1.35 The Mayor's Barriers to Housing Delivery Report (2012)³³ suggested that the proportion of large sites owned by non-house builders has been a substantial delivery constraint in London. The 2014 update³⁴ to this report suggested that this barrier has reduced significantly, reflecting the improved availability of development finance and market values now being achieved. Despite this more optimistic picture, there is concern that even when development commences developer sales practices may mean few large sites are likely to build out more than 500 private sale units over any 5 year period (100 units pa). To reduce their reliance on a limited number of allocations, boroughs should aim to maximise the number and range of identified sites in their trajectory and Local Plans and proactively identify and enable opportunities for housing intensification and renewal through infill/small-scale development and mixed use redevelopment.
- 1.1.36 Delivering 49,000 housing completions a year will clearly require a step change in terms of recent build out rates, particularly on large sites. To accelerate overall housing delivery in London there is a need to encourage and engage partners who are likely to build out units within a shorter time period including investors in purpose built private rented sector housing, specialist provision for students and older people and affordable housing providers. Overcoming barriers to delivery will necessitate effective partnership working between public and private sector stakeholders, in line with Policy 3.15 of the London Plan. The Mayor's Housing Zones initiative is one example of how a more proactive approach can be taken by boroughs and the GLA to increase the speed and certainty of housing provision over the short to medium term, drawing on a range of financial, planning, land assembly and infrastructure delivery mechanisms to kick start development. Further guidance on Housing Zones is provided in Part 7 of this SPG.

³² London Development Database – Approvals and completions figures include conventional and non-conventional housing (including accommodation for students, older people, hostels and HMOs). Approvals granted for the same site within the same year are excluded as explained in paragraph 3.18 of the London Plan Annual Monitoring Report.

³³ Mayor of London, Barriers to Housing Delivery: What are the market perceived barriers to residential development in London, 2012

³⁴ Mayor of London, Barriers to Housing Delivery Update: Private sector housing development on large sites in London, 2014

Monitoring targets

- 1.1.37 The Mayor recognises that the market is prone to fluctuations which affect housing delivery. The use of 'average' annual monitoring targets provides flexibility to take account of the impact of short term market and investment trends. It recognises the potential for housing supply in some boroughs to be 'lumpy' due to the phasing of key large sites and inevitable economic changes experienced over a Plan's life time. However, given London's housing need, it is essential to maintain the long term direction of travel in terms of delivery and this is reflected by 'minimum' 10 year targets.
- 1.1.38 When monitoring housing supply against London Plan targets, boroughs should note that net conventional and non-conventional housing provision can count towards minimum annual targets, including non-self-contained accommodation for students and older people. Boroughs should also include vacant homes returning back into use when monitoring annual housing provision, with care taken to avoid double counting. Net housing supply from conversions can also be counted, providing the net loss of housing units through de-conversions is also monitored. Boroughs should monitor these dimensions of housing supply separately through their AMRs and monitoring returns to the GLA's Local Development Database.

1.2 SOURCES OF HOUSING SUPPLY

- 1.2.1 The following guidance highlights sources of capacity relevant in addressing Policy 3.3, in particular, the requirement to achieve and exceed minimum targets and supplement these with extra capacity in order to address the gap between housing need and supply.

Housing in Inner and Outer London

- 1.2.2 Between 2004 and 2013 average net completions within inner/central London exceeded those in outer London by approximately 2,000 homes a year. Inner/central London averaged 13,000 net completions pa during this period, compared to approximately 11,000 pa in outer London³⁵. Outer London is likely to experience considerable household growth between 2015 and 2036 (see Annex 1). According to GLA central projections, household growth in outer London is expected to exceed that within inner London by approximately 10,000 households a year. Conversely, 60% of London's housing capacity is within inner/central London (25,000 pa), with outer London boroughs providing 40% (17,000 pa).
- 1.2.3 In order to close the gap between need and capacity, outer London boroughs will have to make a more substantial contribution to meeting their projected housing growth and overall housing need. To do this they may wish to focus development in and around town centres and public transport nodes, where there

³⁵ London Development Database. Net housing completions (financial years 2004-2013). Outer London, Inner London and the CAZ are shown on Map 2.2 of the London Plan.

is scope to deliver housing at higher densities, noting the particular locations identified in Policy 3.3. Realising the potential to accommodate higher densities in outer London will necessitate a proactive and design-led approach, taking into account the strategic approach of the Plan to optimise housing output (Policy 3.4), particularly on large residential developments (Policy 3.7). Further guidance on these policies is provided in Section 1.3 and Part 7 of this SPG.

Partnership working across London's boundaries

- 1.2.4 The Mayor recognises the critical importance of working collaboratively with partners across the wider South East to address housing, economic and infrastructure challenges facing the wider metropolitan area as a whole. This strong commitment to effective partnership working and dialogue is recognised in the Plan, particularly Policies 2.2 and 2.3. The Mayor will complement cross-boundary engagement undertaken by boroughs through their duty to cooperate in addressing his own responsibilities to inform and consult with neighbouring authorities under GLA legislation and in preparing the Full Review of the London Plan. In responding to Local Plan duty to cooperate submissions from beyond London the Mayor consistently draws local authority's attention to variations in net migration outflows from London; the importance of longer term trend based demographic projections in taking account of this; and the way in which an understanding of these variations can usefully inform understanding of local housing need.
 - 1.2.5 The GLA has worked with South East England Councils (SEEC) and the East of England Local Government Association (EELGA) to strengthen the regional Strategic Spatial Planning Officer Liaison Group (SSPOLG) to discuss and explore cross-boundary strategic planning and coordination issues with representatives from local authorities from the wider South East on a regular and on-going basis. This is complemented by the sharing of GLA data and expertise with neighbouring authorities to support the alignment of housing and economic policies – a key issue given close migration, commuting and housing market linkages across the wider area.
 - 1.2.6 Looking at a longer-term horizon, the Mayor's 2050 Infrastructure Study provided the opportunity for further dialogue with neighbouring authorities and infrastructure delivery agencies on London's future growth scenarios and the associated infrastructure and funding requirements. The Mayor is currently working with authorities and other stakeholders to establish more effective coordination of strategic policy and infrastructure investment across the wider South East.
 - 1.2.7 Policy 2.2E of the London Plan requires boroughs (particularly those in outer London) to work with authorities and agencies outside Greater London to develop common approaches to 'issues of cross-border significance' when preparing or implementing DPDs. Together with the provision of infrastructure, reconciling housing need and supply is evidently a matter of cross-border significance, on
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which boroughs in Outer London should seek to work closely with neighbouring authorities, in line with the duty to cooperate. Given their role in delivering growth and infrastructure, it is important to engage Local Enterprise Partnerships.

- 1.2.8 Where particularly strong links are identified in terms of housing demand and commuting patterns, boroughs are encouraged to work with local authorities outside London to identify and assess housing need and capacity within sub-market areas. This process can be best served where boroughs are able to demonstrate that they have sought to address need locally by identifying appropriate levels of housing capacity taking into account the planning policy framework provided by the London Plan and NPPF. In relation to need assessments, boroughs should also recognise that Policy 3.8B stresses the importance for Local Plans to take account of housing requirements at different spatial scales, including regional, sub-regional and local levels.

Housing in Growth Areas and Coordination Corridors

- 1.2.9 London Plan Policy 2.3 provides the broad framework for the Mayor and other partners to identify and develop the linkages and development capacity of the two nationally important growth areas which lie partly within London (Thames Gateway and London-Stansted-Cambridge-Peterborough). Policy 2.3 also seeks to develop timescales and mechanisms for coordinating planning and investment in three other corridors of city region importance (the Western Wedge, Wandle Valley, and London-Luton-Bedford Corridor). These are illustrated on the London Plan Key Diagram³⁶. This broad approach is underpinned by responsibilities under the GLA Act and by the Localism Act's Duty to Cooperate.
- 1.2.10 Policy 3.3Ec identifies growth areas and coordination corridors as having the potential to enable additional planned development capacity to supplement London Plan housing targets. Positive, partnership based working and integrated investment across London's boundaries will help to realise housing capacity within the Areas/Corridors.

³⁶ Mayor of London, London Plan, 2015, page 78

Realising housing potential from major transport schemes

- 1.2.11 Policy 6.1 of the London Plan outlines the Mayor's strong commitment to integrate transport provision and new development. It sets out his aim to encourage 'patterns and nodes of development' that reduce the need to travel by car and his support for development in locations where there is high existing or anticipated levels of public transport accessibility through committed and funded improvements. This guiding principle underlines the Mayor's strategic approach to housing supply in London and the particular locations identified for housing and intensification in Policy 3.3E.
- 1.2.12 Crossrail 1 and Crossrail 2, together with a range of other major transport proposals³⁷ and indicative schemes³⁸ outlined in the Plan including the extension of the Bakerloo line and the potential four tracking along the Greater Anglia Line are expected to transform public transport connectivity levels in large areas of the capital, particularly in Outer London, and will drive potential housing output and densities. In light of London's housing need and in order to fully realise the relationship between transport investment and new housing, boroughs should take a positive and proactive approach to identifying, reviewing and enabling further development opportunities where these arise as a result of planned strategic transport investment.
- 1.2.13 Where forthcoming infrastructure will significantly improve connectivity, the potential for housing intensification should be re-evaluated. Residential densities should be optimised in appropriate locations in light of future PTALs³⁹, subject to committed funding and/or robust delivery mechanisms being in place to secure improvements (see para 1.3.23). Depending on particular local circumstances and other London Plan objectives, anticipated uplifts in PTALs may inform the consideration of a wider mix of land uses in an area, including scope for higher density residential led mixed use redevelopment. Given long lead in times and potential delivery constraints affecting large-scale brownfield redevelopment opportunities, it is important boroughs explore and progress the potential for regeneration or intensification in a focused, coordinated and plan-led manner.
- 1.2.14 Through their DPDs boroughs may also identify development opportunities which will benefit from increased accessibility, working closely with key partners such as TfL and Network Rail (Policy 6.4C). Where justified, new Opportunity Areas or Intensification Area status may be considered by the Mayor where these would assist the realisation of substantial growth potential, to be formally identified through further reviews of the London Plan.

³⁷ Refer to Map 6.1 of the London Plan

³⁸ Refer to Table 6.1 of the London Plan

³⁹ Public Transport Access Level

Opportunity Areas

- 1.2.15 Development in Opportunity Areas is expected to be a significant driver of overall housing delivery in London. Current estimates indicate that the 38 Opportunity Areas identified in the London Plan have the potential to provide 303,000 new homes. Between 2015 and 2025, approximately 57% of London's housing capacity on large sites is expected to come from Opportunity Areas, demonstrating the crucial role they play in housing delivery in London⁴⁰. Realising the capacity of some of these sites will pose particular challenges in terms of contamination, public transport accessibility, social infrastructure provision, environmental quality and financial viability. Focused partnership working will be required to bring forward their full potential.
- 1.2.16 The London Plan stresses that development in Opportunity Areas should realise scope for intensification associated with existing or proposed improvements in public transport accessibility, and promote inclusive and sustainable access, including walking and cycling. Experience shows that detailed partnership working on Opportunity Area Planning Frameworks usually identifies significantly more capacity for housing than initial estimates. In line with Policy 3.3, minimum housing guidelines should be supplemented where possible with any additional housing capacity identified through local capacity assessments, planning frameworks, or updated employment land reviews, together with additional housing supply brought forward through planning approvals. Further general guidance on residential and mixed use development in Opportunity Areas is provided in Part 7 of this SPG.

Intensification Areas

- 1.2.17 Areas for Intensification (Policy 2.13) are already built up, strategically important locations where good or improving public transport accessibility provides scope to realise more capacity through redevelopment, regeneration, renewal, intensification and a more appropriate mix of uses. Seven Intensification Areas are identified in Table A1.2 of the London Plan. The Mayor will support boroughs in preparing their planning frameworks for these areas. Potentially these have capacity for some 8,650 homes – approximately 3% of London's large site housing capacity during 2015 - 2025.

New Opportunity and Intensification Areas

- 1.2.18 The Mayor is keen to work collaboratively with boroughs to identify and realise the potential for new Opportunity and Intensification Areas. As indicated in Annex 1 of the Plan, the Mayor is working with Haringey, Sutton, Hounslow and Kingston on proposals for Opportunity Areas in these areas. Other boroughs with aspirations for Opportunity and Intensification Areas may wish to build up a case for inclusion in the London Plan, drawing on local assessments of housing and employment capacity, taking account of the broad criteria highlighted in the London Plan⁴¹.

⁴⁰ Mayor of London, SHLAA, paragraph 3.31

⁴¹ Mayor of London, London Plan, GLA, 2015, paragraph 2.58

1.2.19 New Intensification Areas may be identified in built-up areas with good existing or planned accessibility which have capacity for significant housing intensification and mixed use development but at a level below that of Opportunity Areas. This may include town centres, transport nodes, and areas in inner and outer London with the potential for substantial intensification and renewal.

Mixed use development in town centres

1.2.20 Due to their accessibility and character, London's town centres have substantial potential for housing intensification, particularly through residential-led higher density mixed use redevelopment. GLA research shows over 40,000 homes were completed within or on the edges of London's town centres between 2008 and 2013, with substantial numbers of units in the planning pipeline⁴². Looking to the future, the SHLAA identifies capacity for over 85,000 new homes in town centre locations across London between 2015-2025⁴³. This equates to 20% of London's total housing capacity during this period. The Mayor's Accommodating Growth Report⁴⁴ undertaken following the SHLAA suggests there is potential for town centres to make an even greater contribution to meeting housing need than was captured in the SHLAA, highlighting the scope for additional housing supply to be realised on large sites affected by land use and ownership constraints.

1.2.21 Policy 2.15Dc of the London Plan requires boroughs to proactively manage the changing roles of centres, particularly those with surplus retail and office space, considering scope for housing intensification in town centres as part of higher density, housing led, mixed use redevelopment. Policy 3.3Eb identifies town centres as one of a number of particular locations where boroughs should identify and seek to enable additional housing capacity in order to supplement minimum housing targets. Further guidance on this broad policy approach is provided in Part 7 of this SPG and should be read alongside the Town Centres SPG and the Outer London Commission – Third Report⁴⁵.

Surplus public sector land

1.2.22 Accelerating the disposal of surplus public sector land for housing is a national priority⁴⁶ and a key objective of the Mayor's Housing Strategy. To this end, the Mayor has established the London Development Panel which aims to make it faster, easier and cheaper for publically owned land to be brought forward for redevelopment. In February 2015, the Chancellor and Mayor committed to establish a London Land Commission. The purpose of this body is to identify brownfield land in public sector ownership that is no longer needed and to ensure

⁴² Mayor of London. 2013 London Town Centre Health Check Analysis Report. GLA, 2014, page 106

⁴³ Based on Town Centre boundaries as defined in Borough planning documents.

⁴⁴ Accommodating Growth in Town Centres: Achieving successful Housing Intensification and High Street diversification, Mayor/GLA, 2014, pages viii-x, 97-106

⁴⁵ Outer London Commission, Third Report, GLA, 2014

⁴⁶ DCLG, Accelerating the release of public sector land, 2011

that these sites are brought forward for development by 2025.

Surplus commercial and industrial land

- 1.2.23 Boroughs should identify and seek to enable additional housing capacity on surplus commercial land, in line with Policy 3.3Ed. In light of the strategic approach taken in the London Plan to optimising housing density, boroughs should specifically prioritise the release of surplus industrial and commercial land in areas with good public transport accessibility in order to take advantage of the higher densities such locations can achieve⁴⁷.
- 1.2.24 A rigorous evidence based approach taken in the London Plan to managing industrial and commercial land. This follows the approach of the NPPF, which requires the planning system to do 'everything it can to support economic growth,' whilst also ensuring brownfield land is proactively recycled where it is surplus to requirements⁴⁸. In identifying surplus industrial or commercial land boroughs should have regard to Policies 2.15, 2.17, 4.4, 4.7 and 4.8 of the London Plan. Further guidance is provided in Part 7 of this SPG.

Small sites

- 1.2.25 Boroughs should proactively enable and fully realise the potential for small sites to make a substantial contribution to housing delivery in London, taking into account the strategic need to optimise housing output (Policy 3.4) and increase housing supply (Policy 3.3). Small sites (below 0.25ha) play a crucial role in housing delivery in London. Between 2005 and 2013 on average 10,100 net housing completions were provided each year on small sites, representing 38% of overall housing supply in London⁴⁹. Projected housing delivery on small sites accounts for 25% of London's overall capacity identified in the SHLAA and is expected to comprise over 50% of overall supply in the case of a number of individual boroughs.
- 1.2.26 Residential and mixed use redevelopment on small sites can make a sizeable contribution to housing capacity in appropriate locations where there is good accessibility, particularly in town centres, along high streets and other movement corridors. Small scale infill development opportunities are also critical in encouraging the sensitive renewal and intensification of existing residential areas (Policy 3.3Ee) and facilitating self-build and custom build (Policy 3.8Bj).
- 1.2.27 Enabling as broad as possible a range of small sites to contribute to overall housing supply is vital in order to accelerate housing delivery in London and help minimise the capital's reliance on very large schemes. These are often built out gradually, over phases in order to maintain sales values and address constraints or long-term cash flow issues. Incrementally, increasing the numbers of approved smaller sites – which can potentially be brought forward faster by small and

⁴⁷ Refer to London Plan, paragraphs 2.85 and 4.23

⁴⁸ DCLG, NPPF, paragraph 18 to 22

⁴⁹ London Development Database, net completions on sites under 0.25ha for financial years 2005 - 2013

medium sized house builders - could play just as important a role in accelerating delivery over the short to medium term.

Custom build

- 1.2.28 Boroughs should make appropriate provision for custom build housing, having regard to local need, as set out in Policy 3.8Bj of the London Plan and the NPPF⁵⁰. A proactive approach should be taken to identify and assess opportunities for custom build projects, recognising the potential for this method of delivery to make a greater contribution to the overall scale and speed of housing provision in London. Custom build schemes can also play an important role in increasing the number of small and medium-sized house builders entering the London housing market⁵¹.
- 1.2.29 Self-build/custom-build housing covers a wide spectrum of development models but can be broadly considered as housing which is built or commissioned by its future residents for their own use, either by building the home on their own or working with architects and house builders. Group Custom Build projects are where developers build group schemes for clients on larger sites or where registered housing providers or self-organised community groups work with a developer or contractor to bring forward a custom build home project.
- 1.2.30 Whether custom build housing can be successfully rolled out on a pan-London scale remains untested in terms of deliverability and viability, particularly in light of land values and the typical density of development in parts of the capital. The Mayor's Housing Strategy and funding prospectus⁵² provide strong support for this form of development and recognise there is particular scope for group custom build and other forms of modular build housing given the capital's highly pressurised land market. Government⁵³ and the Mayor⁵⁴ are keen to promote custom build on publicly owned land.
- 1.2.31 Through their Local Plans and asset management functions boroughs should consider which sites may be particularly suitable to custom build. As custom build projects are likely to come forward on small-scale infill sites, boroughs should have particular regard to the following guidance when identifying sites or assessing proposals for custom build housing (see below).

⁵⁰ DCLG, NPPF, 2012 paragraph 50

⁵¹ Mayor of London, Homes for London. The London Housing Strategy, 2014, page 61

⁵² Mayor of London. Build your own home – the London Way. Supporting Custom Build Housing and Community Right to Build, Funding Prospectus. GLA, 2012.

⁵³ DCLG, Right to build: Supporting custom and self-build, 2014.

⁵⁴ Mayor of London. Build your own home – the London Way. Supporting Custom Build Housing and Community Right to Build, Funding Prospectus. GLA, 2012

Small infill developments

- 1.2.32 Infill opportunities within existing residential areas should be approached with sensitivity, whilst recognising the important role well-designed infill or small-scale development can play to meeting housing need. Some potential infill sites may be highly valued, well-maintained and contribute to the context and character of a neighbourhood. In contrast, disused and redundant spaces can have a negative impact on the character of an area and perceptions of pedestrian safety (neglected back garages or storage sheds, for example). Well-designed infill development on surplus or degraded spaces can make a positive contribution to environmental quality and residential amenity by providing natural surveillance and addressing potential hotspots for anti-social behaviour. It can also be an effective way of regenerating local neighbourhoods, creating more mixed and sustainable communities and providing opportunities for custom build. Proposals for well-designed, high quality new homes on sites suitable for infill development should be considered positively by boroughs, unless there are robust reasons to refuse development.
- 1.2.33 In light of London's substantial housing need and constrained housing land supply, infill development proposals (including those for custom build) should demonstrate they broadly respond to the density ranges in SRQ matrix and the overarching need to optimise residential densities taking into account local character and transport capacity (Policy 3.4). Particular regard should be paid to the guidance in section 1.3 which outlines how Policy 3.4 and the density matrix ranges should be applied to small sites in light of surrounding urban contexts and densities. The Outer London Commission's density study⁵⁵ provides further illustrations on how 'optimisation' policy bears on back land development and sites within a suburban context. A flexible and design-led approach is most likely to provide the creative solutions necessary to optimise residential output, whilst also responding to local context and character.

Residential conversions

- 1.2.34 During the early 1990s, conversion of houses to smaller flats represented nearly a third of London's housing capacity and was especially important in inner London⁵⁶. Since then conversions have reduced in importance but remain a significant source of net housing delivery in the capital – 8% of all net housing completions over the ten years from 2004 and 2013 were the result of residential conversions through the sub-division of larger properties (taking account of lost units) – providing nearly 20,000 net additional homes. To reflect the importance of conversions in terms of overall housing supply and in meeting the needs of

⁵⁵ Maccreeanor Lavington Architects, Emily Reeves Architects, Graham Harrington. Housing Density Study. GLA, 2012.

⁵⁶ London Planning Advisory Committee. Strategic Planning Advice. LPAC, 1988. London Research Centre Health & Housing Group, Sizer J. Houses into flats. A study of private sector conversions. HMSO, 1992

smaller households, it is important local policies and decisions are based on robust evidence and take account of strategic housing requirements. As a general principle, locally restrictive policies, including those based on 'conversion quotas', should not be applied without robust justification. When monitoring net supply from conversions, account needs to be taken of the net loss of dwellings from de-conversions⁵⁷.

- 1.2.35 While the Strategic Housing Market Assessment (SHMA) identifies a net need for family-sized market housing, this is a pan-London figure that assumes the continuation of existing patterns of under-occupation.⁵⁸ GLA projections show nearly 70% of household growth between 2011 and 2035 will be for households without children⁵⁹. Continuing high housing costs and demand for urban locations may also encourage households to economise further on living space. Consequently, there is likely to be continued demand for conversions of larger homes into smaller units at local and neighbourhood levels. This is often a response to market signals such as a lack of provision of new build flats in an area, growth in smaller households or increasing demand in the private rented sector.
- 1.2.36 A balance has to be struck between realising the potential of conversions to address housing need, especially those of smaller households, and sustaining the residential quality and amenity of neighbourhoods where pressure for conversions is particularly intense. Local planning guidance should ensure that garden parking and waste and recycling facilities typically associated with conversions do not detract from the streetscape or have negative impacts in terms of flood risk, biodiversity or climate change. Where possible, secure and convenient cycle parking provision should be provided in appropriate locations where homes are converted into flats, which should be well integrated with the street scene.
- 1.2.37 Boroughs should manage conversions in light of local, sub-regional and strategic housing needs assessments (Policy 3.8), taking into account particular local circumstances. For example, conversions of flats into a larger home may be necessary to respond to overcrowding and address the need for larger family sized properties in an area.

De-conversions and amalgamations

- 1.2.38 In some neighbourhoods, especially in parts of central London, de-conversion of a number of smaller units into larger dwellings can reduce capacity to meet the requirements of small households. Where there is local evidence that the amalgamation of separate flats into larger units is leading to the sustained loss of homes, boroughs are encouraged to resist this process in line with London Plan Policy 3.14. Further guidance on housing loss and conversions is provided in Part 5 of this SPG.

⁵⁷ The re-conversion or amalgamation of smaller private units into larger dwellings.

⁵⁸ Mayor of London, The 2013 London SHMA, GLA, 2014 , refer to Table 1 and paragraph 0.21

⁵⁹ Mayor of London, The 2013 London SHMA, GLA, 2014 , page 74, Table 11

1.2.39 Guidance in part 2 of this SPG makes clear that LP Policy 3.5 on the quality of residential development applies to residential conversions. The Mayor supports boroughs and other agencies in taking local action and enforcing against illegal conversions/ developments, including 'beds in sheds'⁶⁰.

Housing from surplus offices

1.2.40 The London Plan encourages the planned redevelopment of surplus or unviable office space for housing and other uses (Policy 4.2). Research shows that prior to the Government's permitted development right changes in May 2013, the planning system in London was already delivering substantial numbers of housing completions and planning approvals for the redevelopment and change of use of surplus office land and stock - approximately 11,400 housing completions were delivered from this source between 2009 and 2012, together with a further planning pipeline of 27,600 units⁶¹. Conversions from office to residential floorspace provided on average 1,180 homes a year in London during the seven years leading up to the Government's changes in 2013⁶². This demonstrates that London had a successful and pragmatic approach to enable the redevelopment and conversion of surplus office stock through the formal planning application process.

1.2.41 Research also shows the residential unit gains arising from planned redevelopment of surplus offices has been around three times greater than for conversions of offices to residential through change of use⁶³. Planned redevelopment can also deliver a higher standard of new accommodation, improved residential amenity and design quality, together with affordable housing provision. Boroughs and other partners are encouraged to take this into account when considering potential housing capacity from this source.

1.2.42 Monitoring of approvals and completions since the introduction of permitted development rights for change of use from office to residential in May 2013 shows much higher rates of approvals in terms of the number of consented housing units and the potential reduction in office floorspace. Initial pan-London monitoring shows housing completions from this source have not substantially increased compared to long term trends, this will need to be monitored closely, taking into account overall impacts on office floorspace provision. Further guidance on London Plan mixed use policies and residential-led, mixed use redevelopment of surplus office is provided in Part 7 of this SPG.

1.2.43 The Government has made office to residential permitted development rights permanent outside exempted areas and has stated that boroughs with current

⁶⁰ The Mayor is working with Boroughs, Government, London Fire and Emergency Planning Authority and other agencies to administer resources addressing the issue of 'beds in sheds'.

⁶¹ The London Office Policy Review 2012, page 131, Table 8.2

⁶² London Development Database, statistics for financial years 2006 to 2012

⁶³ The London Office Policy Review 2012, page 131, Table 8.2

exemptions will have until May 2019 to adopt Article 4 Directions in order to continue to operate exemptions from this point onwards.

Private garden land development

1.2.44 London Plan Policy 3.5 A states that 'Boroughs may in their LDFs introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified.' This locally sensitive approach reflects paragraph 53 of the NPPF. Where planning permission is required, boroughs are advised to consider proposals for development in gardens in the light of local circumstances, taking into account the value gardens have in addressing the range of strategic policy objectives, particularly in terms of:

- defining local context and character including local social, physical, cultural (Policy 7.4, 3.5);
- providing safe, secure and sustainable environments and play spaces for children (Policy 3.6);
- supporting biodiversity, protecting London's trees, 'green corridors and networks' (Policies 7.19, 7.21);
- flood risk management and sustainable drainage (Policies 5.12 and 5.13)
- mitigating the effects of climate change including the 'heat island' effect and urban greening (Policies 5.1, 5.9, 5.10); and
- enhancing the distinct character of suburban London (Policy 2.6).

1.2.45 Boroughs should seek to strike an appropriate balance between these and other London Plan policies, in particular the strategic objective to provide a wide choice of homes Londoners can afford, including family sized units, taking account of the specific needs of large families (Policy 3.8). Alongside new build provision and turnover within the existing housing stock, extensions to existing homes and the sensitive renewal and intensification of existing residential areas is likely to play an important role in meeting demand for larger properties in the capital, helping to address overcrowding and affordability issues in certain areas.

Basement extensions

1.2.46 Paragraph 3.33 of the London Plan outlines the range of London Plan policies which should be taken into account when considering planning applications for basement development. Where subterranean extensions to existing dwellings pose planning policy (as opposed to enforcement/regulation) issues, boroughs are advised to consider the bearing of such development on London Plan policies addressing sustainable design and construction (5.3), retrofitting (5.4), overheating and cooling (5.9), flood risk (5.12), sustainable drainage (5.13), construction and demolition waste (5.18), water use and supplies (5.15), trees (7.12) and biodiversity (7.119). The Sustainable Design and Construction SPG outlines a range of issues and potential mitigation measures to consider in relation to basement development. This includes ground/surface water flooding,

residential amenity, land stability, trees and archaeology which should be considered, together with the potential mitigation measures outlined⁶⁴.

Non self-contained accommodation

- 1.2.47 Household spaces in non self-contained (NSC) accommodation count towards the London Plan's overall housing provision targets. NSC can include student accommodation, specialist accommodation for older people, nurses' hostels and shared housing for other groups (including vulnerable or disabled people), and houses in multiple occupation.
- 1.2.48 NSC accommodation plays a strategically important, if not always fully recognised, part in meeting the needs of different groups of Londoners. For monitoring purposes, NSC accommodation has not been disaggregated from the overall housing provision targets in Annex 4 of the London Plan. Nevertheless, boroughs should monitor these distinct elements of housing provision separately in order to address the London Plan requirement to provide a range of housing choices suitable for different groups (Policy 3.8). Conversion of NSC accommodation into self-contained accommodation may result in a net loss of housing provision. This should be recognised when monitoring conversions.

Student accommodation

- 1.2.49 Both the London Plan⁶⁵ and the NPPG⁶⁶ recognise that specialist accommodation for students can help to reduce pressure on housing stock. This is particularly pertinent in London considering the number of universities, the importance of the private rented sector and capital's large student population. In recent years, purpose built student accommodation has made a substantial contribution to overall housing supply in London, providing on average 2,700 units a year between 2004 and 2013. This represents 11% of all net housing completions in London during this period.⁶⁷
- 1.2.50 Policy 3.8Bh of the London Plan requires boroughs to meet identified local and strategic requirements for student housing, without compromising the capacity for conventional homes. For the purpose of this policy, 'strategic need' is defined as being a 'demonstrable need generated by institutions located beyond the boundaries of boroughs where development is proposed.'⁶⁸ In addressing Policy 3.8Bh boroughs should consider:
- the strategic requirements for student housing identified in the London Plan⁶⁹ and any future GLA research, noting that this can change over time;

⁶⁴ Mayor of London, Sustainable Design and Construction SPG, 2014, page 25-29

⁶⁵ Mayor of London, London Plan, GLA, 2015, para 3.52

⁶⁶ Planning Practice Guidance, Paragraph: 038 Reference ID: 3-038-20140306

⁶⁷ LDD data for financial years 2004 to 2013

⁶⁸ Mayor of London, London Plan, GLA, 2015, footnote 86A

⁶⁹ Mayor of London, London Plan, GLA, 2015, paragraph 3.52

- the emphasis placed in the London Plan on encouraging a more dispersed distribution of student housing away from areas of central London where student housing has historically been concentrated⁷⁰;
- the need to secure accommodation that is more affordable for students (see Part 4);
- the particular suitability of town centres and other accessible locations for student accommodation as part of higher density, residential led, mixed use redevelopment and regeneration;
- the potential positive impacts on town centre vitality in terms of activity and footfall during the day and night to support local shops, services and the evening economy⁷¹; and
- London's student housing pipeline⁷².

1.2.51 The extent to which the provision of student accommodation is compromising the capacity for conventional homes should be considered in the context of a borough's housing requirement and housing trajectory, taking into account London's strategic requirements for student housing and any demonstrable net benefits student housing provision is likely to have on the existing housing stock in terms of supply and affordability. To manage potential tensions with conventional housing supply boroughs should work in partnership with key stakeholders in the sector to proactively identify sites or broad locations which are appropriate for student housing and develop local policies. Further guidance on student accommodation is provided in Part 3 – Choice.

Specialist housing for older people

1.2.52 Boroughs should work positively and collaboratively with providers to identify sites which may be suitable for specialist housing for older people. This should take into account London's changing age structure, the indicative requirement benchmarks in Annex 5 of the London Plan and further guidance provided in Part 3 of this SPG. When assessing proposals, boroughs are encouraged to consider the potential 'net gains' housing provision of this kind can have in terms of freeing-up existing homes for occupation, particularly under-occupied larger family sized properties.

1.2.53 Self-contained housing for older people such as sheltered housing and extra care accommodation will have an important role to play in meeting London's need, particularly that for private and intermediate sale. Sites within and on the

⁷⁰ Mayor of London, London Plan, GLA, 2015, para 3.53a, also refer to Mayor's Academic Forum Report, page 3

⁷¹ Accommodating Growth in Town Centres: Achieving successful Housing Intensification and High Street diversification, Mayor/GLA, 2014, page 138

⁷² The 2013 London SHLAA identifies a pipeline of nearly 20,000 consented student housing units which are anticipated to be delivered between 2015 and 2025 (see Annex 1). This will be updated regularly in the London Plan AMR.

edge of town centres and other areas with good accessibility to public transport and facilities are likely to be suitable for this form of provision and may be attractive to downsizers⁷³. NSC residential/nursing care homes have more specific requirements in terms layout, density and parking provision and can often be accommodated within existing residential areas.

1.2.54 In appropriate locations, the conversion or redevelopment of existing conventional homes to specialist housing for older people should be considered positively, particularly in light of the overall strategic need for this type of provision and the modest recent rate of net supply. Proposals for the conversion/redevelopment of existing residential homes to care homes should be considered in the context of Policy 3.14B and Policy 3.8Be, together with other policy requirements, recognising that any net additional C2 and C3 units for older people can count towards London Plan housing supply targets (Policy 3.3). Guidance on managing the existing stock of specialist accommodation for older people is provided in Part 5.

Flats above shops

1.2.55 The upper storeys of town centre retail and other buildings accommodate a variety of uses, including storage and offices as well as flats. Many of these are economically viable and continue to make important contributions towards meeting local needs. However, a significant number are under-occupied or vacant. Bringing forward housing in under-used upper floors along high streets can enhance high street vitality and improve perceptions of safety during the evenings. Scope for the conversion or redevelopment of surplus or obsolete commercial space along high streets and mixed use redevelopment at higher densities should be explored and identified through Local Plans and town centre strategies, ensuring this supports wider efforts to revitalise and regenerate high streets. It is important to ensure sufficient secondary and tertiary capacity is retained for small and start-up businesses and community uses which make an important contribution to town centres in terms of diversity, job creation and day time activity and spend.

Airspace developments over existing and new non-residential premises

1.2.56 Unused airspace above relatively low density commercial, leisure and infrastructure uses can provide scope for housing intensification and mixed use development, especially in locations with good public transport access such as town centres and main bus movement corridors. The redevelopment of existing supermarkets and their car parks provides a significant potential source of additional housing capacity, where operational constraints can be resolved⁷⁴.

⁷³ Accommodating Growth in Town Centres: Achieving successful Housing Intensification and High Street diversification, Mayor/GLA, 2014, page 205-206

⁷⁴ ERM. Food stores in London: the potential for providing housing. Tesco, Housing Corporation 2002
Mayor of London. Making better use of supermarket sites. Draft Best Practice Guidance. GLA, 2004,

Boroughs should explore the possibility of incorporating new housing where proposals come forward for new or redeveloped supermarkets. Housing can also be accommodated above garages, showrooms, repair depots, self-storage uses, schools, public sector depots, leisure facilities, fire stations, multi-storey car parks and other retail outlets⁷⁵. The Town Centres SPG provides additional guidance on integrating housing with non-residential uses⁷⁶.

- 1.2.57 Residential accommodation on upper floors should complement existing uses and activities where these are continued as part of a redevelopment proposal or are located on an adjacent site. Account should be taken of commercial lender's perceptions of risk when considering the development viability of this form of redevelopment. Where housing is located either above or adjacent to an established noise generating land use, appropriate design mitigation measures should be required, for example sound proofing or slightly raising residential units which are located above or adjacent to a particular noise generating activities. A design led approach should ensure that existing non-residential uses can continue to be operated without having unreasonable restrictions imposed on them, as set out in the London Plan (Policy 7.15Bb).

Live-work units

- 1.2.58 In principle, live-work units represent a sustainable form of urban living, providing the closest integration of home and work places. The London Plan seeks to provide a variety of dwellings and opportunities for more sustainable forms of urban living. This includes live-work accommodation. However, the consequences of introducing residential uses into predominantly business/ industrial areas for which there is identifiable demand should be considered carefully in the context of strategic and local employment policies and the pressure in certain parts of London on small business and industrial premises (Policies 2.17, 4.4). Conditions and planning agreements to secure live-work uses should provide a disincentive to 'pure' residential occupation. When considering demand for live-work accommodation account should be taken of the flexibility in the planning system to enable working in existing homes.

Vacant Dwellings

- 1.2.59 The need to encourage the return of long term vacant dwellings to active housing use is recognised in London Plan Policy 3.14 and the SHLAA. The Mayor's Housing Strategy sets out a strategic aim that no more than 1% of homes in London should remain empty for more than 6 months. The NPPF strongly supports boroughs identifying and bringing empty homes back into use⁷⁷ The

⁷⁵ London Residential Research. Developing additional housing above and on non-residential sites. DETR, 2002

⁷⁶ Mayor of London. Town Centres SPG, Section 2.2

⁷⁷ DCLG, NPPF, para 51

NPPG⁷⁸ states that empty homes returning to residential use can count towards meeting housing requirements, providing steps are taken to avoid 'double counting' when assessing need and supply. In this respect, boroughs should note that in order to avoid double counting the number of empty homes has not been counted within the existing stock of dwellings when estimating overall housing need in the SHMA. Further guidance on bringing vacant homes back into use is provided in para 5.1.5 of this SPG under 'Existing Stock'.

1.3 OPTIMISING HOUSING POTENTIAL

- 1.3.1 One of the key themes of the London Plan is the recognition that while the best use should be made of development opportunities, proper account must be taken of the range of factors which have to be addressed to "optimise," rather than simply maximise, housing potential. Of particular importance are ensuring good design and taking into account public transport capacity and local context and character. Other relevant factors include access to social infrastructure, open space and play provision. This balanced approach to optimising output is supported by the London Plan's broad design policies in Chapter 7 and the specific housing standards proposed in Policy 3.5. Taking all these factors into account independent consultants suggest that for the purposes of the Plan, **'optimisation' can be defined as 'developing land to the fullest amount consistent with all relevant planning objectives'**⁷⁹.
- 1.3.2 Ensuring high density housing is sustainable and successful depends on a complex range of factors including location, management, occupancy and tenure of a development, and all should be taken into account when schemes are designed. Research into peoples' neighbourhood preferences suggests that housing density in itself may be less significant to resident satisfaction than dwelling type and the neighbourhood characteristics⁸⁰. Different forms of development can have similar densities. High density does not always have to mean higher rise development. A number of studies explore how high density schemes can provide good quality, attractive housing and ensure the most efficient use of land⁸¹.

⁷⁸ DCLG, NPPG, Paragraph: 039 Reference ID: 3-039-20140306

⁷⁹ Maccreeanor Lavington Architects, Emily Greeves Architects, Graham Harrington. Housing Density Study. GLA, 2012 This study was commissioned by the GLA on behalf of the Outer London Commission. It provides useful illustrations of the way London Plan Policy 3.4 on optimising development can be implemented in different circumstances, taking account of the wide range of considerations encountered in 'real world' development proposals, and has informed preparation of this SPG.

⁸⁰ e.g. East Thames Housing Group/London School of Economics. Housing density: What do residents think. ETHG/LSE, 2002; and London Housing Federation. Higher Density Housing for Families: A Design and Specification Guide. LHF, October 2004

⁸¹ Maccreeanor Lavington et al 2012 *ibid* Mayor of London. Housing for a Compact City. GLA, 2003 Cope, H; Averbury International. Capital Gains. Making high density work in London. Housing Corporation, London Housing Federation, 2002 McCormac, Jamieson, Pritchard. Sustainable Suburbia. MJP Architects, Work

- 1.3.3 London has historically developed at a wide range of densities, with many of its most successful residential neighbourhoods being built at relatively high density more than a century ago⁸².
- 1.3.4 Much of this higher density housing stock (often five or six storeys high with communal gardens and shared open spaces) is popular and of high value. The Outer London Commission's study⁸³ provides up-to-date, good practice illustrations and detailed advice specifically on implementation of London Plan Policy 3.5, including case studies of different forms of development at various densities in different settings and locations.
- 1.3.5 While it is accepted that development density was a significant issue in its own right in the past when, for example, physical proximity of homes was a real problem in terms of public health and the spread of contagious disease, nowadays density is more an outcome of the implementation of policies to secure a better environment and the interplay of this with development viability. As the Outer London Commission's independent consultants⁸⁴ noted:
- "residential density policy is about everything and nothing. On the one hand it informs everything to do with housing design and management. On the other hand, the actual density calculation of an acceptable development (in terms of units or habitable rooms per hectare) is a product of all the relevant design and management factors; if they are all met, the resultant figure is what it is and is arguably irrelevant."
- 1.3.6 That is not to say that density in its own right is no longer a Mayoral concern - it is, but it is only one among a much wider range of amenity, transport and social policies to manage development in ways to secure sufficient numbers and types of home in a high quality environment while taking account of local character. Thus, the London Plan includes a density matrix as only one part of a wider policy to optimise development on sites in different settings, with different levels of public transport and accommodating homes of different sizes. The density ranges are sufficiently wide to accommodate the spectrum of policy considerations which must be taken into account when optimising development at a particular location.

in progress Design For Homes. Recommendations for living at super-density. Design for Homes, 2004
Enterprise LSE Cities. Density and urban neighbourhoods in London. LSE, 2004
Urhahn Urban Design, Urban Progress Studio, GVA Grimley. Housing Intensification in seven south London town centres. LDA, 2009
Urhahn Urban Design, CBRE. TEN: town centre enhancement in north London. LDA, GOL, 2007
Zero Zero Architects. Sustaining our suburbs. Zero Zero Architects, 2007

⁸² The net density of historic speculative housing developments in Maida Vale, Notting Hill, Belgravia or Bloomsbury can reach over 200 dwellings per hectare and three-storey Victorian and Edwardian terraces around outer London's town centres can be as high as 100 dwellings per hectare

⁸³ Maccreeanor Lavington et al 2012 *ibid*

⁸⁴ Maccreeanor Lavington et al 2012 *ibid*

1.3.7 London's constrained land supply means it is essential that the London Plan sets out strategic density policy to guide development in the capital in terms of 'Sustainable Residential Quality' (SRQ). This is a broad concept which includes density but integrates it with wider environmental, transport and social objectives. This approach to sustainable development and density resonates closely with the NPPF⁸⁵. Policy 3.4 and the SRQ matrix have been refined and tested at EIPs over a decade⁸⁶. As expressed in the London Plan the concept is particularly concerned to ensure that the quality of housing output is not compromised by the need to make the most efficient use of land. The policy therefore takes into account:

- **the need to secure residential quality** (including the need to take into account local context and character and achieve high quality design) through policies 3.5, 7.1-7.12;
- **optimising the relationship between transport capacity and land use to secure sustainable development** - a fundamental tenet not just of the London Plan (Policies 6.1 – 6.3), but also of national planning policy⁸⁷, and
- **the density guidelines** themselves, which also reflect these objectives. They are expressed as wide and appropriate ranges set out in a density matrix (London Plan Table 3.2 – see below) in order to accommodate local variations in three broad types of urban setting and public transport accessibility. They are designed both to cover the range of development situations found across London and to be sensitive to local circumstances, including the need to accommodate homes of different sizes. To reinforce this they are expressed in terms of habitable rooms per unit and hectare as well as the more conventional 'dwellings per hectare'.

⁸⁵ DCLG NPPF 2012 *ibid* paras 47, 58

⁸⁶ Llewellyn Davies et al. *Sustainable Residential Quality: New Approaches to Urban Quality*. LPAC, 1998
Llewellyn Davies et al. *Sustainable Residential Quality: Exploring the Housing Potential of Large Sites*. LPAC 2000

⁸⁷ DCLG NPPF 2012 *ibid* paras 6-9, 29-30

TABLE 3.2 - DENSITY MATRIX (HABITABLE ROOMS AND DWELLINGS PER HECTARE)

	SETTING	PUBLIC TRANSPORT ACCESS LEVEL (PTAL)		
		0 TO 1	2 TO 3	4 TO 6
INDICATIVE AVERAGE DWELLINGS SIZE	SUBURBAN	150 - 200 HR/HA	150 - 250 HR/HA	200 - 350 HR/HA
	3.8 - 4.6 hr/unit	35 - 55 u/ha	35 - 65 u/ha	45 - 90 u/ha
	3.1 - 3.7 hr/unit	40 - 65 u/ha	40 - 80 u/ha	55 - 115 u/ha
	2.7 - 3.0 hr/unit	50 - 75 u/ha	50 - 95 u/ha	70 - 130 u/ha
	URBAN	150 - 250 HR/HA	200 - 450 HR/HA	200 - 700 HR/HA
	3.8 - 4.6 hr/unit	35 - 65 u/ha	45 - 120 u/ha	45 - 185 u/ha
	3.1 - 3.7 hr/unit	40 - 80 u/ha	55 - 145 u/ha	55 - 225 u/ha
	2.7 - 3.0 hr/unit	50 - 95 u/ha	70 - 170 u/ha	70 - 260 u/ha
	CENTRAL	150 - 300 HR/HA	300 - 650 HR/HA	650 - 1100 HR/HA
	3.8 - 4.6 hr/unit	35 - 80 u/ha	65-170 u/ha	140 - 290 u/ha
	3.1 - 3.77 hr/unit	40 - 100 u/ha	80 - 210 u/ha	175 - 355 u/ha
	2.7 - 3.0 hr/unit	50 - 110 u/ha	100 - 240 u/ha	215 - 405 u/ha

Source: Greater London Authority

Notes to Table 3.2: Appropriate density ranges are related to setting in terms of location, existing building form and massing, and the index of public transport accessibility (PTAL). The setting can be defined as:

- **central** – areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 metres walking distance of an International, Metropolitan or Major town centre.
- **urban** – areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys, located within 800 metres walking distance of a District centre or, along main arterial routes
- **suburban** – areas with predominantly lower density development such as, for example, detached and semi-detached houses, predominantly residential, small building footprints and typically buildings of two to three storeys.

Applying the density matrix

1.3.8 Policy 3.4 and Table 3.2 are critical in assessing individual residential proposals but their inherent flexibility means that Table 3.2 in particular should be used as a starting point and guide rather than as an absolute rule so as to also take proper account of other objectives, especially for dwelling mix, environmental and social infrastructure, the need for other land uses (eg employment or commercial floorspace), local character and context, together with other local circumstances, such as improvements to public transport capacity and accessibility. The London Plan is clear that the SRQ density matrix should not be applied mechanistically, without being qualified by consideration of other factors and planning policy requirements. Guidance on considering schemes above or below the ranges in the density matrix is provided below in paras 1.3.50 to 1.3.55.

- 1.3.9 It is essential, when coming to a view on the appropriate density for a development, that proper weight is given to the range of relevant qualitative concerns set out in Policy 3.5 and relevant policies in chapter 7 of the London Plan so an informed judgement can be made about the point at which a development proposal falls within the wide density range for a particular type of setting/location. The maximum of the range should not be taken as a 'given', much less a minimum expectation. Unless additional, significant reasons to justify exceeding the top of the appropriate range can be demonstrated, proposals should normally be resisted (see para 1.3.50). Chapter 2 and Policy 3.7 of the London Plan sets out the types of locations which may justify exceeding the top of the relevant density range⁸⁸. This is on the condition that a range of qualitative considerations are suitably addressed.
- 1.3.10 Conversely, greater weight should not be given to local context over location or public transport accessibility unless this can be clearly and robustly justified. It usually results in densities which do not reflect scope for more sustainable forms of development which take best advantage of good public transport accessibility in a particular location.
- 1.3.11 It is clear from this that making decisions on housing density requires striking a sensitive balance which takes account of a wide range of complex factors. With the exception of the 200-300 major applications which come before the Mayor each year, application of the broad density policy outlined in the London Plan and expressed in DPDs is very properly a local matter.

Application of the SRQ Matrix to non-conventional housing

- 1.3.12 For avoidance of doubt, it should be noted that the matrix relates only to Use Class C3 dwelling houses. It is not intended for application to short term serviced accommodation, student hostels, or residential institutions (C2). It was designed primarily to address new build development. Guidance on applying the matrix to mixed use residential development is set out below.

Local policies

- 1.3.13 London Plan Policy 3.4 requires development of LDF policy in line with the SRQ approach and within the broad residential density ranges set out in Table 3.2 (see below). These are designed to accommodate the generality of development circumstances across London. These broad ranges provide a sufficiently flexible framework within which boroughs can refine approaches to their local circumstances while still conforming to the broad parameters of strategic policy when preparing LDFs. Local policies should be cast in terms of Policy 3.4 and Table 3.3 rather than seeking to 'plan by exception.' In refining the matrix for local application through local policy, boroughs should not as a matter of policy principle go below the range for a particular type of setting/location - the density ranges set out in the matrix are designed to accommodate the range of settings commonly found in different parts of London.

⁸⁸ Mayor of London, London Plan, GLA, 2015, paragraphs 3.28A, 3.42, 2.62, 2.72F, 2.85

1.3.14 The following section provides detailed guidance on the range of considerations which should be taken into account when implementing Policy 3.4 and the density matrix.

Density and dwelling type

- 1.3.15 Density decisions on new schemes should take account of the different housing needs of the households who will live in the completed scheme. The determination of which housing needs a scheme will meet should be informed by local and sub-regional housing priorities and the London Plan's priority for affordable family housing. Family housing is defined generally in the London Plan Glossary as having three or more bedrooms. Lower density developments lend themselves more, though not exclusively, to family housing, which in turn will require a higher level of provision of open areas and play space.
- 1.3.16 In broad terms, higher densities (which assume a lower number of habitable rooms per dwelling) will be more suitable for households without children and will require less open space and play provision. Higher density housing can be particularly suitable in town centre and edge of centre locations; in areas with good public transport accessibility; and as an element of mixed-use developments, where open space and car parking may be limited. This does not preclude provision of family homes in town centres when open space, play space, car parking, social infrastructure and other relevant factors can be addressed satisfactorily.
- 1.3.17 In areas with particularly high accessibility, consideration should be given to capitalising on this to make higher density provision for smaller households. In addition, there should be consideration of the extent to which the provision of smaller accessible and adaptable units in suitable locations as part of higher density mixed use development can encourage downsizing and potentially help to free-up under-occupied larger properties for families in the existing housing stock. The provision of smaller units may also help relieve pressure to convert existing family sized properties into flats. Further guidance on accommodating growth in smaller households is provided in Part 7 of this SPG (para 7.4.9-11).
- 1.3.18 Schemes should be designed to maximise tenure integration and affordable housing units should have the same external appearance as private housing⁸⁹. In some higher density schemes, separate provision of entrance and circulation spaces for different tenures may enable affordable housing provision which might otherwise be made unviable given high service charges and management arrangements. All entrances will need to be well integrated with the rest of the development and meet the Mayor's housing standards in terms of entrance and approach, accessibility and active frontages (see Part 2 of this SPG).
- 1.3.19 For planning purposes a habitable room is usually defined as any room used or intended to be used for sleeping, cooking, living or eating purposes. Enclosed spaces such as bath or toilet facilities, service rooms, corridors, laundries,

⁸⁹ Mayor of London, London Plan, 2015, para 3.76

hallways, utility rooms or similar spaces are excluded from this definition. In some circumstances, a large kitchen or kitchen dining room may be counted as a habitable room, but the approach varies between boroughs. There is no statutory definition for kitchens to be counted as a habitable room, nor is there any statutory size threshold. Many boroughs, however, include a figure of between 13 and 15 square meters in LDFs: any kitchen above that minimum is usually counted as a habitable room. Generally, a kitchen with a small table and chairs in one corner, or a kitchen 'bar', would not be counted as a habitable room. A room with a clearly defined kitchen at one end and a clearly defined dining area at the other (with a dining table and chairs) would be counted as a habitable room (see also Part 2 on Quality).

- 1.3.20 Effective implementation of the policy to optimise housing output and maximise the affordable housing delivery can be compromised by the provision of particularly large dwellings, especially in central London. In these circumstances, boroughs may consider benchmarking proposals against the unit per hectare density ranges provided in the density matrix (Table 3.2) and the minimum space standards (Table 3.3) in order to examine the number of dwellings and the amount of affordable housing that would normally be sought from schemes yielding average sized homes on a particular site or location. This is especially the case where proposals would be marginally under the thresholds for application of affordable housing policy.
- 1.3.21 Where a development includes family housing, accessible play spaces designed to meet the needs of younger and older children should be provided, taking account of the projected child population in line with Policy 3.6.
- 1.3.22 Linking the level of density to the accessibility of public transport (and, in light of local circumstances, its frequency and capacity) is a central consideration in making the best use of a site, helping to realise the proper potential of those within walking distance of public transport and town centres whilst allowing lower densities where public transport accessibility and capacity is less. This will usually mean building on London's existing pattern of urban development, consolidating its network of town centres, as well as realising new opportunities for intensification based on improvements in public transport accessibility.

Public transport access level (PTAL)

- 1.3.23 To help relate new development to public transport, the London Plan uses Public Transport Access Level (PTAL) data supplied by Transport for London (TfL) to measure the level of connectivity to the public transport network. Low PTAL scores do not by themselves preclude development, but will limit the densities which will be appropriate on such sites, unless a significant change in public transport connectivity levels can be achieved to justify the use of a higher density range without undermining the achievement of sustainable development. In assessing a site's capacity, a site-specific PTAL assessment should be carried out.

- 1.3.24 The tool WebCat⁹⁰ provides a base year for PTAL and for forecast PTAL values for 2021 and 2031. These should be taken into account when taking planning decisions on major sites⁹¹. When agreeing proposed housing densities which are based on future transport improvements, development partners should ensure that robust mechanisms are put in place to secure and deliver improvements to accessibility through planning obligations or other commitments. Like the density matrix, PTAL should not be interpreted mechanistically when assessing planning applications. The distance and quality (in terms of legibility, permeability and general attractiveness) of walking and cycling routes to local public transport nodes will always be of crucial importance.
- 1.3.25 In cases where PTAL varies across the site, prospective developers and boroughs should take a common sense approach to identifying the most appropriate PTAL rating or ratings. For small and medium sites (1 to 149 homes), it will usually be most appropriate to use an average existing/expected rating for the site as a whole and to apply the density matrix across the site. For larger development proposals (eg Mayoral referrals), TfL can undertake more site specific assessments which cannot be shown on a higher level map and it may be appropriate to assign different existing/expected PTAL ratings to identified sub-areas or phases, with different densities being appropriate for different parts of the site. This is likely to be particularly important for Opportunity and some Intensification Areas.
- 1.3.26 The Plan recognises that while PTAL is a sound, strategic measure for assessing public transport connectivity and should provide the context for informing planning decisions at local level, it is not the only index of transport connectivity – others can also be relevant. These include forthcoming features of TfL's WebCAT which are expected to include cycling connectivity and catchment analysis. In addition, Time Mapping (TIM), which is available on WebCAT, is a helpful source of complementary information regarding levels of connectivity. TIM can shed additional light on some journey time aspects which are not picked up by PTAL and can therefore help ensure that the discussion of connectivity in the study area is as complete as possible.
- 1.3.27 London Plan paragraph 3.30 states that "where transport assessments other than PTALs can reasonably demonstrate that a site has either good existing or planned public transport connectivity and capacity, and subject to the wider concerns of this policy (Policy 3.4 Optimising Housing Potential which underscores the importance of taking account of local context and character) the density of a scheme may be at the higher end of the appropriate density range. Where connectivity and capacity are limited, density should be at the lower end of the appropriate range".

⁹⁰ WebCat is available at - <https://tfl.gov.uk/info-for/urban-planning-and-construction/planning-with-webcat/webcat>

⁹¹ Mayor of London, The London Plan, 2015, Policy 3.7

Viability and density

- 1.3.28 One of the 12 core planning principles of the NPPF is that plans should take into account market signals such as land prices and housing affordability (para 17). Careful attention should also be paid to the viability of development in plan-making and decision-taking to ensure deliverability (para 173).
- 1.3.29 The amount and type of development on a site (i.e. its density) is a key factor that affects a scheme's financial viability and, therefore, its deliverability. The London Plan density matrix is based on both units and habitable rooms per hectare, both of which should be considered when considering viability issues.
- 1.3.30 Whilst the amount of development is a key factor in terms of viability, it is not always the case that maximising development potential leads to maximising financial returns. There is an optimum combination of variables for any particular scheme which maximises residential value. The Outer London Commission's study⁹² on optimising development provides guidance on the relationship between density and viability, including highlighting the importance of a constructive development management approach.

Setting/Character

- 1.3.31 Defining the setting of an area requires local knowledge and may entail an element of professional judgement, recognising the character of an area can change over time. Boroughs may wish to define the setting as part of their Local Plan process, drawing on the guidance in this SPG, local characterisations studies and the notes attached to Table 3.2 in the London Plan.
- 1.3.32 In locations where there is scope for intensification and change, particularly on large sites, 'setting' for the purposes of Table 3.2 should not be defined in a static way in relation to the character of the surroundings area, without considering: the potential for large sites to define their own characteristics in terms of setting and densities; and for new development to be successfully integrated into its immediate context through considerate design (see 'large sites' and 'borders and edges' below). Local characterisation studies can help boroughs to identify areas which have the potential to accommodate managed change and higher density development (Policy 7.4C). Further guidance is also provided in the Character and Context SPG.
- 1.3.33 For the sake of clarity, the 'central' setting applies generally to locations in or within 800 metres walking distance of the Central Activities Zone, an International, Metropolitan or Major town centre as listed in the town centre network in Annex 2 of the London Plan. Locations in, or within 800 m of a District centre are generally considered to give an area an 'urban' setting. These extend along main arterial routes and substantial parts of the remainder of inner London.

⁹² Maccreeanor Lavington et al 2012 *ibid* Section 7 J

- 1.3.34 The 800m distance is generally taken to approximate to 10 minutes walking distance⁹³. The character of areas around the CAZ and town centres can change quickly and the Central and Urban settings should be applied to a shorter distance where a character appraisal prepared or agreed by a borough indicates that a tighter boundary would be appropriate.
- 1.3.35 Dwelling size and, indirectly, built form, should primarily reflect the housing requirements of the group for whom housing is provided. To inform this, the matrix sets out appropriate density ranges for dwellings of different sizes using habitable rooms per unit ratios. These run from 2.7 – 3.0 habitable rooms per unit giving densities of 215 – 405 units per hectare in 'central' locations with good public transport accessibility, to 3.8 – 4.6 habitable rooms per unit giving densities of 35 – 55 units per hectare in suburban locations with low accessibility. Where provision is primarily for families, an appropriate built form should be assumed in light of the unit density.
- 1.3.36 When considering where a particular development should 'sit' within a broadly appropriate density range consideration should be given to the range of factors set out in this section of the SPG. In situations where the setting is not already defined, prospective developers should seek to agree the setting (and PTAL ratings) of a site with the borough at an early stage. If agreement cannot be reached they should include their rationale in the Design and Access Statement.

Large sites

- 1.3.37 To varying degrees, because of their size and scale, large sites, including many Opportunity and Intensification Areas, can define their own setting and accommodate higher densities. As a general rule, the better the quality of the existing built environment and the more legible the setting of areas surrounding the site, the larger the site needs to be to define its own setting. Typically, sites over two hectares usually have the potential to define their own setting. However, this should be considered on a case by case basis, taking into account the location of the site including distance to town centres and other infrastructure; the potential for place shaping and place shielding; and the local and strategic objectives for the area.
- 1.3.38 Policy 3.7 recognises the particular potential for large sites to create distinctive neighbourhoods and generate the critical mass to support social, physical and green infrastructure. It emphasises the need for sites of this scale to be progressed through a plan-led process to encourage higher densities. This process will need to take into account existing or planned PTALs and transport capacity. Where large sites abut areas with a particularly distinctive character a considered approach to the design of edge conditions along a site's boundary

⁹³ Llewellyn Davies et al. Sustainable Residential Quality: New Approaches to Urban Quality. LPAC, 1998
Llewellyn Davies et al. Sustainable Residential Quality: Exploring the Housing Potential of Large Sites.
LPAC 2000

may be necessary in terms of height, massing, scale or landscaping to enable higher densities to be achieved within a site interior (see 'borders and edges').

- 1.3.39 Of particular relevance to large site development is research⁹⁴ showing the importance of encouraging pedestrian movement to and from surrounding communities. This permeability should reflect desire lines, especially those associated with efficient access to public transport, retail, community and other facilities⁹⁵, which in turn supports 'place shaping' to which local communities can relate. Such sites need to support the principle of creating 'walkable neighbourhoods'. The Mayor's Road Task Force (RTF) highlights how the different 'Street Types' should be considered in terms of their 'movement' and 'place' function from both a local and strategic perspective⁹⁶. These factors should be taken into account in the layout and design of streets on large sites.
- 1.3.40 A similar principle should be applied to cycling, with TfL's Analysis of Cycling Potential showing the scale of change that could be achieved if a significant proportion of shorter, local journeys were to be switched from motorised transport to cycling⁹⁷. The Mayor's Vision for Cycling in London⁹⁸ and London Cycle Design Standards (LCDS)⁹⁹ set out the different types of infrastructure and best practice considerations in providing cycle infrastructure in London.
- 1.3.41 On large sites where the build-out will be phased over time, a cumulative density assessment should be provided with the development proposal. This should show how proposed density will change over time by outlining the density proposed for different phases of a scheme. The need to take account of variations in PTAL scores across large sites, and of the impact of mixed use development and its contribution to place shaping should be recognised.

⁹⁴ URS, Patel Taylor. London Plan Density Matrix Review. GLA, 2006

⁹⁵ Llewellyn Davies. Sustainable residential Quality: exploring the housing potential of large sites. CON 68. LPAC, 2000

⁹⁶ Roads Taskforce Report, Page 82- 101 <https://tfl.gov.uk/corporate/publications-and-reports/roads-task-force>

⁹⁷ Transport for London. Analysis of Cycling Potential Policy Analysis Research Report, 2010. Available <https://tfl.gov.uk/cdn/static/cms/documents/analysis-of-cycling-potential.pdf.pdf>

⁹⁸ <https://www.london.gov.uk/sites/default/files/Cycling%20Vision%20GLA%20template%20FINAL.pdf>

⁹⁹ <https://tfl.gov.uk/cdn/static/cms/documents/lcds-chapter1-designrequirements.pdf>

Sites on borders and edges of 'settings'

1.3.42 The setting of areas where the character of the urban fabric changes can usefully be defined in LDFs (e.g. around the edges of some town centres where low density suburban areas abut the higher densities of the centre). This may usefully provide some certainty for development, particularly where the urban form varies in terms of height, scale, massing and density. However, this should not rule out the potential for large sites to define their own 'setting' in terms of Table 3.2 (also see 'setting' and 'large sites' above). There should be recognition that the character of an area can change over time and may be positively enhanced by new development.

1.3.43 Boroughs should seek to positively and proactively manage change in appropriate locations, drawing on the principles of 'place shaping' and, where necessary 'place shielding':

- 'Place shaping' reflects how a new development contributes to and alters an existing place on a neighbourhood scale. It entails the use of wider planning, housing, economic development and management tools to create a successful place, including the management of uses and the shaping of massing, building height and the layout of routes and urban spaces at a neighbourhood scale.
- 'Place shielding' entails managing the interface between different places where new buildings on the edge of a site can buffer the surrounding area from larger scale buildings within the site or protect the buildings within the site from larger scale buildings or non-residential uses around its edge. For example, where necessary, buildings of a lesser height can be placed on the edge of large sites to provide some transition in terms of scale and massing in relation to the immediate surrounding context, whilst allowing the interior of a site to define its own setting/character and accommodate higher densities than the surrounding area.

1.3.44 Place shielding mechanisms should be implemented flexibly and in robustly justified circumstances, rather than as a general rule. This should take into account the Plan's emphasis on optimising housing output, the design principles set out in chapter 7 of the London Plan, which includes the consideration of heritage assets - and particular local circumstances. As recognised in the London Plan, there should be scope for well-designed new development to positively enhance and reinforce the future character and legibility of an area, especially where this is poorly or ill-defined, whilst at the same time building on the positive elements of local character which exist in a particular location (Policies 7.4, 7.1).

Standards for privacy, daylight and sunlight

1.3.45 Policy 7.6Bd requires new development to avoid causing 'unacceptable harm' to the amenity of surrounding land and buildings, particularly in relation to privacy and overshadowing and where tall buildings are proposed. An appropriate degree

of flexibility needs to be applied when using BRE guidelines¹⁰⁰ to assess the daylight and sunlight impacts of new development on surrounding properties, as well as within new developments themselves. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations, where BRE advice suggests considering the use of alternative targets. This should take into account local circumstances; the need to optimise housing capacity; and scope for the character and form of an area to change over time.

1.3.46 The degree of harm on adjacent properties and the daylight targets within a proposed scheme should be assessed drawing on broadly comparable residential typologies within the area and of a similar nature across London. Decision makers should recognise that fully optimising housing potential on large sites may necessitate standards which depart from those presently experienced but which still achieve satisfactory levels of residential amenity and avoid unacceptable harm.

Undeveloped Areas/Areas with Indeterminate Character

1.3.47 There are still large parts of London that are currently substantially undeveloped or have for other reasons 'no definable character' e.g. very large brownfield sites. This is especially the case in former industrial sites. In such areas new developments will be unlikely to interfere with existing settings and offer particular scope for place shaping to create attractive to new communities. The appropriate density range in such areas should be primarily guided by:

- strategic and local proposals for these areas;
- public transport considerations (current and planned accessibility, connectivity and capacity);
- their location (i.e. the distance to the closest town centre), and planned future setting; and accessibility on foot or bicycle (legibility, permeability and distance from local public transport nodes e.g. stations and bus stops).
- scope for mixed use development, especially to contribute to place shaping.

Small Sites

1.3.48 Small sites have specific opportunities and constraints with regards to density. When establishing the appropriate density for small sites, special attention should be given to factors influencing the setting of a development site, including existing streetscapes, massing and design of the surrounding built environment. Where the density of buildings surrounding small sites is below the appropriate range in the density matrix the site may if necessary be developed towards the lower end of the appropriate range. Where the density of surrounding buildings is above the appropriate range in the matrix, a small site can be developed to the higher end of the appropriate density range. In both cases detailed urban form analyses

¹⁰⁰ BRE, Site layout planning for daylight and sunlight: a guide to good practice, BRE, 2011

may suggest that higher or lower densities are necessary to take account of local context.

1.3.49 Small sites may require little land for internal infrastructure such as internal roads, amenity space and social infrastructure, and it is appropriate for density to reflect this¹⁰¹. Where it can be demonstrated that infrastructure and amenity space requirements arising from development of a small site can be met outside the site, consideration should be given, subject to meeting other planning policy requirements, to developing it at the higher end of the appropriate density range. This is likely to be a particular consideration for housing intensification in town centres, high streets and areas/corridors with high public transport connectivity.

Developments above the density ranges

1.3.50 The London Plan and this SPG confirm that it is not appropriate to apply Table 3.2 mechanistically and advise that the density ranges should be considered as a starting point rather than an absolute rule when determining the optimum housing potential of a particular site¹⁰². As confirmed in Section 1.1, meeting London's housing requirements will necessitate residential densities to be optimised in appropriate locations with good public transport access. Consequently, the London Plan recognises the particular scope for higher density residential and mixed use development in town centres, opportunity areas and intensification areas, surplus industrial land and other large sites¹⁰³. In addition, the Plan confirms that the Housing SPG will provide general and geographically specific guidance on the justified, exceptional circumstances where the density ranges may be exceeded¹⁰⁴.

1.3.51 In appropriate circumstances, it may be acceptable for a particular scheme to exceed the ranges in the density matrix, providing important qualitative concerns are suitably addressed. However, to be supported, schemes which exceed the ranges in the matrix must be of a high design quality and should be tested against the following considerations:

- the factors outlined in Policy 3.4, including local context and character, public transport capacity and the design principles set out in Chapter 7 of the London Plan;
- the location of a site in relation to existing and planned public transport connectivity (PTAL), social infrastructure provision and other local amenities and services;
- the need for development to achieve high quality design in terms of liveability, public realm, residential and environmental quality, and, in particular, accord with the housing quality standards set out in Part 2 of this SPG;

¹⁰¹ Llewelyn Davis et al 1998 *ibid*

¹⁰² Mayor of London. London Plan. 2015, GLA, paragraphs 3.28

¹⁰³ *ibid*, 3.42, 2.62, 2.72F, 2.85

¹⁰⁴ *ibid*, paragraphs 3.28A

- a scheme's overall contribution to local 'place making', including where appropriate the need for 'place shielding';
- depending on their particular characteristics, the potential for large sites to define their own setting and accommodate higher densities;
- the residential mix and dwelling types proposed in a scheme, taking into account factors such as children's play space provision, school capacity and location;
- the need for the appropriate management and design of refuse/food waste/ recycling and cycle parking facilities; and
- whether proposals are in the types of accessible locations the London Plan considers appropriate for higher density development (eg. town centres, opportunity areas, intensification areas, surplus industrial land, and other large sites).

1.3.52 Where these considerations are satisfactorily addressed, the London Plan provides sufficient flexibility for such higher density schemes to be supported. It should, however, be recognised that this is not an exhaustive list and other more local or site specific factors may also be given appropriate weight, taking into account the particular characteristics of a proposed development and its impact on the surrounding area.

Developments below the density ranges

1.3.53 The London Plan recognises that one of London's great attractions is the variety of its residential offer, including the range of housing densities which contribute to it, and the broad ranges set out in the density matrix are designed to accommodate these. This has to be balanced against the imperative explained in the London Plan and earlier in this document to make optimum use of London's scarce land resources.

1.3.54 One of the few parts of the capital where there may be robustly justified exceptions to the widespread coverage provided by the matrix are some suburban outer London neighbourhoods which have particularly poor public transport accessibility and a demonstrably distinct, low density character¹⁰⁵. While the lowest indicative benchmark in the matrix, 35 dph, covers the generality of development in most suburban areas, when optimising development in very low PTAL (0 - 1) parts of suburban outer London, boroughs are advised that there is sufficient flexibility in Policies 3.4 and 3.5 to give weight to the distinct character of areas which have a lower density to that in the matrix. In each case, this should be demonstrated to be appropriate, having regard to London Plan policies and guidance in this document.

1.3.55 Other than in managing development in agreed and particularly distinctive parts of suburban outer London with very low PTALs (0-1), proposals for development below the density matrix ranges should be addressed as exceptions to policy

¹⁰⁵ Mayor's Outer London Commission. Second Report to the Mayor. GLA, 2012

and must be robustly justified in light of particular local circumstances to ensure that they meet the requirements of Policy 3.4 and wider concerns, especially those to make the most effective use of land and meet local and strategic housing requirements. Large sites in suburban areas of London will have scope to define their own setting and character for the purposes of Table 3.2 and, subject to transport capacity and accessibility, potentially enable higher residential densities (see London Plan Policy 3.7 and guidance on 'setting', 'large sites' and 'place shielding' above).

Play space, open space and social infrastructure requirements

- 1.3.56 Planned as well as existing infrastructure (including that intended to be provided through the development process) should be considered when establishing appropriate density ranges. It is important to ensure that appropriate levels of social and environmental infrastructure are provided to meet needs generated by new development. The Plan recognises large sites and areas of major new development and regeneration can support infrastructure delivery (Policy 3.7, 3.16). The potential for development to support new infrastructure provision should be fully explored in terms of residential densities, recognising London's growing infrastructure requirements; the potential for multi-use facilities and co-locating housing and social infrastructure; and site-specific viability, deliverability, contextual and design considerations.
- 1.3.57 Where additional infrastructure needs are generated by a new development and are to be met on-site (eg for play space, open space, schools or health facilities), this may affect the proposed density range and quantum of development. Depending on the context and other planning considerations, this may lead to densities being reduced or increased in order to accommodate essential infrastructure. Whilst the density ranges are sufficiently broad to accommodate the range of residential and mixed use proposals in different contexts, the density matrix should not be applied mechanistically in ways which either penalise or disincentivise developers from providing open space, play provision or other social infrastructure facilities on-site where this is appropriate and achievable. Guidance on calculating densities in paragraphs 1.3.68-70 should be considered in relation to mixed use development and the inclusion of large areas of open space within a site area.
- 1.3.58 A careful balance should be struck between optimising housing output, enabling infrastructure delivery and achieving residential and environmental quality. In areas with particularly good accessibility which may be particularly suited to provision for smaller households (eg. transport nodes and town centres), consideration should be given to capitalising on the available public transport capacity in these locations to make higher density provision for smaller 1 and 2 bed units. This may generate comparatively reduced on-site requirements for social infrastructure, play and open space provision, thus enabling higher residential densities to be achieved.
-

Design

- 1.3.59 Development design should reflect the requirements of Policy 3.4, the housing standards outlined in Policy 3.5 and detailed in this SPG (Part 2) and the general design principles set out in Chapter 7 of the London Plan. This includes those set out in London Plan policies on architecture (7.6), the public realm (7.5), the location and design of tall and large buildings (7.7), local character (7.4), inclusive design (7.2), designing out crime (7.3) and London's heritage assets and strategic views (7.8-7.12) - all of which should be considered carefully when applying Policy 3.4. Securing high quality housing output is essential and it is recognised that in some circumstances this may constrain the density which otherwise might be expected in a particular location. In such exceptional circumstances, departures from Policy 3.4 must be justified robustly.
- 1.3.60 In taking account of local character, Policy 3.4 resonates with section of 7 the NPPF. It requires a thorough appreciation of the 'defining characteristics' of a neighbourhood; of what will add to its quality and sense of place; of the need to optimise its development potential; to respond to local history; create safe and accessible environments and be visually attractive as a result of good architecture. However, it does not seek to 'impose architectural styles or particular tastes and should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles.'¹⁰⁶ It does seek to promote/reinforce local distinctiveness, whilst recognising that the character of an area can change over time and may be enhanced by new development. Further guidance on these considerations is provided in the Character and Context SPG.
- 1.3.61 A design-led approach should be taken in applying Policy 3.4 and the density matrix to a particular site taking account of the location, accessibility, setting, context and character, including heritage assets. Whilst a rigorous approach to residential density and the need to optimise housing output should be followed, the application of the density matrix should only be a starting point when considering a proposal. Fully optimising housing potential will necessitate high quality, innovative design to ensure new development successfully responds to challenges and opportunities presented on a particular site.
- 1.3.62 Archaeological Priority Areas; Historic England are undertaking a review of their Best Practice to help boroughs identify and refine Archaeological Priority Areas in order to help focus resources on where there may be significant known heritage interest or potential for new discoveries. This will help boroughs and developers narrow down the areas within their boroughs which may be affected.

¹⁰⁶ DCLG, NPPF, para 60

Levels of car parking

- 1.3.63 On any site, car parking can take up a considerable amount of land nominally available for housing. Some of this provision may be essential (e.g. for servicing and parking for disabled people), but the amount of space set aside for cars can often be consolidated or minimised through good design (Policy 6.13, table 6.2 of the London Plan).
- 1.3.64 Research suggests that conventional designs for residential development on small sites can lead to 25% to 40% of the area being effectively lost to motor vehicle related uses¹⁰⁷. The amount of land required for car parking can be reduced substantially by a more integrated approach, taking account of location, access to public transport and the scope for higher density development. This in turn can raise site values, enabling funding of additional affordable housing and providing scope to enhance the quality of both the residential environment and the housing itself¹⁰⁸.
- 1.3.65 However, car ownership (if not its frequent use) is something which many Londoners value. In line with the NPPF¹⁰⁹, the Plan recognises this in its central axiom to optimise development potential alongside transport capacity. Parking can pose particular issues in certain locations in outer London where low public transport access mean that residents may be more dependent on the car than elsewhere in the capital¹¹⁰ (London Plan para 2.36).
- 1.3.66 The Mayor asked the Outer London Commission¹¹¹ to again investigate this and provide advice on how policy might be implemented more sensitively to meet residents' needs within the overall objectives of the Plan and those of the NPPF. This advice has informed the changes to Policy 6.13 through the Minor Alterations to the London Plan. These changes provide outer London boroughs with an appropriate degree of flexibility when applying minimum parking standards in areas with low public transport access (generally PTALs 0-1) and in some limited parts of areas within PTAL 2 which may be particularly dependent on car travel.

¹⁰⁷ Llewelyn Davies, South Bank University, Environment Trust Associates. The Quality of London's Residential Environment. LPAC, 1994. Llewelyn Davies, Savills, Urban Investment. Sustainable Residential Quality, New Approaches to Urban Living. LPAC, 1998. Outer London Commission 2012 *ibid*. Maccreanor Lavington et al 2012 *ibid*

¹⁰⁸ e.g. in terms of internal space standards, storage, 'life z time homes' requirements, and more energy efficient forms of design and construction

¹⁰⁹ CLG NPPF 2012 *ibid* paras 39 - 40

¹¹⁰ London Plan

¹¹¹ Outer London Commission, 2015, Fourth Report, 2015

Calculating densities

- 1.3.67 The London Plan defines density in terms of net residential site area¹¹². This relates to the 'red line' planning application site boundary and excludes adjoining footways, carriageways, paths, rivers, canals, railway corridors and other existing open spaces. It includes the proposed homes, non-residential uses in mixed use buildings, ancillary uses, car and cycle parking areas and proposed internal access roads. It generally includes proposed on-site open spaces (including publicly accessible spaces), gardens and children's play areas.
- 1.3.68 However, counting very large, on-site, publicly accessible open spaces, such as some of those proposed for some London Plan Opportunity Areas, could serve to artificially lower density calculations. Consequently, applicants proposing particularly large spaces (relative to the size of the site) should seek to agree a bespoke method of calculating density in discussion with boroughs, and where appropriate, GLA officers. It is important that calculation of density does not penalise developers in providing adequate public amenity and open space. The London Plan expresses density both in terms of dwellings and, to take better account of the needs of different types of household, habitable rooms per hectare.

Calculating densities on mixed use developments

- 1.3.69 Research suggests that combining residential uses with other uses can lead to more effective use of common infrastructure (e.g. water, sewerage, power), minimise the need to travel and help provide active street uses. However, if density is measured in units per hectare or habitable rooms per hectare (as in the Density Matrix) it can underestimate the impact of the development in terms of scale and massing, activity and the demand for services¹¹³.
- 1.3.70 In calculating density in vertically mixed schemes (i.e. where housing is on top of non-residential uses), it may be appropriate for the size of the site to be reduced by an amount that is equivalent to the proportion of total floorspace allocated to non-residential uses (both below and above ground, measured as GIA) before calculating residential density in the normal way (see example below).
- 1.3.71 Where schemes have a substantial proportion of non-residential uses eg more than 30% - 35%, the density matrix can usefully be complemented by plot ratio in addition to calculating density. In calculating plot ratio for these purposes, the total floorspace of all uses (measured as GIA) should be divided by the net site area. In addition:
- A all proposed non-residential floorspace (measured GIA) should be counted.

¹¹² Areal measurement should follow RICS 6th edition 'Code for Measuring Practice: a guide for surveyors and valuers', or subsequent editions. (NB- A worked example of how to apply this Code to mixed use development is given on page 42)

¹¹³ URS, Patel Taylor 2006 *ibid*

GIA should be as defined in the RICS 6th Edition 'Code of Measuring Practice for Surveyors and Valuers', or subsequent editions,

- B the floorspace of proposed student housing and residential institutions (Use Class C2) should be counted as non-residential space.

1.3.72 Whilst these approaches can be informative, they should not be applied mechanistically, as the appropriate density for any mixed use development will depend on the particular characteristics of a scheme, including its massing and design impact and whether this would be appropriate in a particular location.

MACCREANOR LAVINGTON WORKED EXAMPLE FOR CALCULATING RESIDENTIAL DENSITY ON MIXED USE SCHEMES:

Net Site Area: 1.6ha

Residential GIA: 25,200sqm including 75 basement car parking spaces (78%)

Non-residential GIA: 7,000sqm (22%)

Number of dwellings: 250

Dwelling Mix (unit):

1-bed – 87 (35%)

2-bed – 120 (48%)

3-bed – 30 (12%)

4-bed – 13 (5%)

Number of Habitable Rooms: 719

Density calculation based on 78% of the net site area (reducing the site area by 22% - the proportion of proposed non-residential floorspace), giving a site area for density purposes of 1.25ha.

Density: 200 u/ha (575hr/ha)



PART 2:

QUALITY

2.1 INTRODUCTION

The importance of housing quality

- 2.1.1 The Mayor is clear that one of his key planning priorities is “to improve standards for the quality and design of housing, making sure that homes meet the needs of a changing population throughout their lives, and are built to the highest environmental standards”¹¹⁴. The London Plan (LP) reflects this and promotes design quality in all new homes to enhance and extend London’s architectural heritage and deliver higher design standards for everyone. The Mayor’s aim is to deliver new housing in all tenures which is fit for purpose in the long term; comfortable, safe, accessible, environmentally sustainable, and spacious enough to accommodate the changing needs of occupants throughout their lifetimes.
- 2.1.2 London’s population is projected to grow to 10.11 million by 2036. Meeting the capital’s housing need for 49,000 new homes a year will necessitate housing output being optimised on brownfield sites (Policy 3.4), particularly in locations with good public transport accessibility such as town centres and opportunity and intensification areas. Given the scale of growth required, it is crucial that new housing is delivered to a high standard in terms of architecture, urban design, environmental and residential quality, accessibility and adaptability. Inclusive design and accessibility are particularly important to meeting London’s diverse needs (see Part 3 - Choice).
- 2.1.3 In the face of these challenges, it is possible and necessary to address growth demands and accelerate housing delivery whilst ensuring buildings meet the highest design standards, helping to foster sustainable communities, protecting and improving the environment and mitigating and adapting to climate change. The commitment to increase housing supply in London must not be met at the expense of quality.
- 2.1.4 The design standards reflect the Mayor’s policy for new housing to meet the needs of all Londoners at different stages of life. Housing should be designed so that people can use it safely, easily and with dignity regardless of their age, disability, gender or ethnicity. It should meet inclusive design principles by being responsive, flexible, convenient, accommodating, and welcoming. It should be designed to accommodate and easily adapt to a diverse range of needs, for example, for people who are frail, older, have a visual or hearing impairment, have learning difficulties or who are wheelchair users. Housing should also support family life, whether in the flexibility and generosity of units for smaller families, or in the provision of larger homes. The standards integrate key policies in the LP that have a bearing on design issues for new housing including Policy 3.5 Quality and Design of Housing Developments, Policy 3.6 Children and Young People’s Play and Informal Recreation Facilities, Policy 3.8 Housing Choice, Chapter 5 policies (in particular Policy 5.3 Sustainable Design and Construction), Policy

¹¹⁴ Mayor of London. Planning for a Better London. GLA, 2008

6.9 Cycling, Policy 6.10 Walking, and Chapter 7 policies (in particular Policy 7.1 Lifetime Neighbourhoods, Policy 7.2 An Inclusive Environment, Policy 7.3 Designing Out Crime, Policy 7.4 Local Character, Policy 7.5 Public Realm and Policy 7.6 Architecture).

Housing standards review

- 2.1.5 This Section of the SPG addresses the quality and design of housing developments (Policy 3.5). This policy was amended by Minor Alterations to the London Plan (MALP) in 2016. The Minor Alterations were carried out in response to the Government's housing standards review, which sought to set consistent standards for housing across the country.
- 2.1.6 The Government's new national technical standards comprise new mandatory standards on security, additional 'optional' Building Regulations on water and access, and a new nationally described space standard. The system complements the existing set of Building Regulations which are mandatory. The new standards, which are described as "optional", are optional to the extent that the development plan sets which standard should be applied. For water and access, if no optional standards are set in the development plan, the mandatory Building Regulation standard applies.
- 2.1.7 The Government is clear that local planning authorities should not set in their emerging Local Plans or supplementary planning documents, any additional local technical standards or requirements relating to the construction, internal layout or performance of new dwellings¹¹⁵. This is to ensure consistency and give greater clarity to developers. As the London Plan forms part of the borough's development plan, the standards set out in MALP can be applied at the local level. When Local Authorities review their plans they can draw on the MALP evidence base to support their approach.
- 2.1.8 In addition to reflecting the new national technical standards as set out in MALP, some refinements have been made to standards not affected by the review, such as those relating open space and design (e.g standard 12 - number of dwellings per floor per core and standard -29 dual aspect); these amendments are to improve clarity, implementation and consistency with other Mayoral guidance.

Transition

- 2.1.9 To cover the period between October 2015 and the adoption of MALP the Mayor published a policy statement which set out which of the Government's standards apply from October 2015. The Transition Statement is superseded by the MALP and this SPG. However, as the approach set out in the Transition Statement is the same as the approach adopted through the MALP, these standards have been in

¹¹⁵ Written ministerial statement; Steps the government are taking to streamline the planning system, protect the environment, support economic growth and assist locally-led decision-making. 25 March 2015. Rt Hon Eric Pickles

place since October 2015 and clearly articulated since May 2015, providing clarity and consistency to the development industry.

2.1.10 The Interim London Housing Design guide 2010(LHDG) is also superseded by the MALP and SPG. However, many development agreements with the GLA Housing and Land team include contractual requirements to meet the standards set out in the LHDG and thus the document remains relevant for some legacy schemes.

Content

2.1.11 The 2016 Minor Alterations to the Plan adopted the **nationally described space standard**. As this standard is set by Government and clearly set out in the Technical housing standards -nationally described space standard document¹¹⁶ the details of the standard are not repeated in this SPG.

2.1.12 The 2016 London Plan makes clear that ninety percent of new housing¹¹⁷ should meet Building Regulation requirement M4 (2) 'accessible and adaptable dwellings' and ten per cent of new housing¹¹⁸ should meet Building Regulation requirement M4 (3) 'wheelchair user dwellings', i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users. As set out in paragraph 2.1.14 the relevant category of Building Regulation will be secured through planning condition and each dwelling will need to meet all the requirements set out in Part M of the Building Regulations. Approved Document Part M provides clear guidance on how to meet these requirements and thus it is not necessary to repeat such guidance in this SPG. Part M covers the majority of the access standards that were previously set out in the 2012 Housing SPG.

Application of the Mayor's housing standards

2.1.13 Policy 3.5 of the London Plan is clear that the following housing standards apply to all new housing in London. This includes new-build dwellings, conversions and change of use schemes where new dwellings are created. The only exception to this is the access standards; these are set through the Part M of the Building Regulations which generally does not apply to dwellings resulting from a conversion or change of use. The standards apply to all tenures. The standards do not apply to specialist forms of housing which are not in the C3 use class such as student housing, care homes and homes in multiple occupation.

2.1.14 The new national technical standards are applied in two ways; the access and water standards are applied through Building Regulations – planning policy sets

¹¹⁶ DCLG. Technical housing standards - nationally described space standard. 2015 <https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard>

¹¹⁷ Unlike the other standards in this Plan, Part M of the Building Regulations generally does not apply to dwellings resulting from a conversion or a change of use. Additional guidance on the applicable requirements of the Building Regulations (amended 2015) can be found in: Approved Document M Access to and use of buildings Volume 1: Dwellings.

¹¹⁸ *ibid*

out which optional Building Regulation should be met and this will be applied through a condition relating to the permission. Compliance is assessed in the same manner as other Building Regulations. Because the relevant 'optional' building regulation is applied through a condition, **all elements of the regulation must apply**. The space standards continue to be applied through planning policy

- 2.1.15 For individual applications, adherence to the standards should be clearly demonstrated in a design and access statement, which will be used to assess the acceptability of any proposal.
- 2.1.16 The policy is divided between considerations for new housing developments at the **neighbourhood** (Part B) and individual **dwelling** (Part C) scales. The following guidance outlines the design standards for meeting the provisions of Policy 3.5 at both of these scales.
- 2.1.17 The standards set out the minimum level of quality and design that new homes should meet. The extent to which proposed developments depart from the standards should be taken into account in planning decisions. Application of standards through the planning system (as they are through this SPG) provides some flexibility. Consideration should be given to these standards alongside achievement of other policies of the London Plan. In particular, regard should be had on the one hand to overall viability and the need to ensure an appropriate level of housing supply in changing economic circumstances. On the other hand, consideration should be given to the fact that the homes and living environments we build today will frame the lives of those who will live in new homes or use the neighbourhoods now and into the future.
- 2.1.18 Failure to meet one standard would not necessarily lead to an issue of compliance with the London Plan, but a combination of failures would cause concern. In most cases, departures from the standards will require a clear and robust justification. Policy 3.5 (see Part D) provides flexibility in this respect where development proposals meet specific, identified needs and demonstrate exemplary design quality, for example through an appropriate design review process.
- 2.1.19 Application of the standards in relation to Listed Building related development, some conversions and development in conservation areas may require sensitivity and flexibility; in some circumstances it may be justified to not apply certain standards. Policy 3.5 and this SPG are designed to provide the flexibility necessary to respond to the constraints and opportunities presented by individual sites. As with all development proposals, implementation of planning policy, including Policy 3.5 and associated Building Regulations, should take account of the range of policy concerns bearing on a particular site.

2.2 NEIGHBOURHOOD SCALE (POLICY 3.5, PART B)

- 2.2.1 Paragraph B of Policy 3.5 highlights the importance of new housing development contributing to and enhancing the quality of local places through consideration
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of physical context, local character, density and residential mix. It recognises the need for new development to enhance the provision of and relationship with public, communal and open spaces and the particular need to take account of the requirements of children, older and disabled people.

- 2.2.2 Policy 3.5 is supported by Policy 7.1 which sets out the principles of Lifetime Neighbourhoods. This promotes well-connected, walkable neighbourhoods which provide a choice of homes and accessible infrastructure, services and supporting uses and facilities in order to enhance health and wellbeing, social inclusion and community cohesion. Policy 7.1 requires buildings and spaces to be designed to reinforce or enhance the character, legibility, permeability and accessibility of a neighbourhood and contribute to people's sense of place, safety and security. It encourages the layout, tenure and land use mix of new development including its interface with surrounding land uses to be designed to improve people's access to social, community and green infrastructure, including public transport and the Blue Ribbon Network. Further guidance on Lifetime Neighbourhoods is provided in the Accessible London, Town Centres and Social Infrastructure SPGs.

Defining Good Places

Standard 1 - Development proposals should demonstrate:

- a How the design responds to its physical context, including the character and legibility of the area and the local pattern of building, public space, landscape and topography.
- b How the scheme relates to the identified character of the place, to the local vision and strategy or how bolder change is justified in relation to a coherent set of ideas for the place expressed in the local vision and strategy or agreed locally.

Standard 2 - Development proposals should demonstrate:

- a How the scheme complements the local network of public spaces, including how it integrates with existing streets and paths.
- b How public spaces and pedestrian routes are designed to be overlooked and safe, and blank elevations onto the public realm at ground floor have been avoided.
- c For larger developments, how any new public spaces including streets and paths are designed on the basis of an understanding of the planned role and character of these spaces within the local movement network, and how new spaces relate to the local vision and strategy for the area.

- 2.2.3 Policy 3.5 stresses the importance of new housing development taking account of physical context and local character. Where existing character is ill defined or of poor quality, new housing development should seek to improve both the physical context and local character. This is supported further in Policy 7.4 Local Character. The Mayor encourages a design approach that carefully responds to
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the whole context of a development and builds on an understanding of the place, the observation of existing assets, and the local authority's existing vision or spatial strategy for the area. Through scale, material, massing and building type, development should take account of the existing character and urban grain of a place and build on its positive elements.

- 2.2.4 Where a spatial strategy or characterisation study is already in place, this should be applied, with new development demonstrating how it contributes to the vision and strategy for the area. Where no such guidance is in place, those who propose bolder change should undertake an inclusive process that allows for a coherent vision for the future of the area to be developed and realised. Further guidance on implementing Policy 7.4 is provided in the Mayor's Character and Context SPG. Proposals for new housing development should also demonstrate how it will complement and integrate with the public realm and local movement network (Policy 7.5 Public Realm). The objective should be to develop or enhance the public realm surrounding or directly related to the site in question. Routes and spaces should be legible with a clear understanding of whether they are public, semi-public or private (Policy 7.3 Designing out Crime).
- 2.2.5 Development proposals should also enhance provision of green infrastructure in the public realm, helping to mitigate and adapt to climate change (Policy 5.10 Urban Greening), extend tree cover (Policy 7.21), improve biodiversity (Policy 7.19) and to help enhance physical activity, walking and cycling opportunities and reconcile conflicts of use (Policy 3.2 Improving health and addressing health inequalities Policy 6.9 Cycling and Policy 6.10 Walking). See also the All London Green Grid SPG.
- 2.2.6 In order to promote healthy living and active travel at the neighbourhood scale it is important that streets and spaces within larger developments are planned in such a way as to encourage residents to walk and cycle. Further evidence and guidance on the role transport has in improving health can be found in TfL's health action plan 'Improving the health of Londoners' (2014)¹¹⁹. A well designed neighbourhood is well-connected and where people can choose to walk and cycle a wide range of journeys.
- 2.2.7 In line with LP Policies 3.5 and 7.1-7.3, the layout and design of residential and mixed use development should ensure a coherent, legible, inclusive and secure environment is achieved. Blank and inactive frontages at ground level should be minimised and natural surveillance should be provided from the ground floor of buildings where possible (see Standards 3.1.3 and 5.1). New housing should be inclusive and accessible for all residents and respond to and address the requirements of an ageing population. Further guidance on inclusive environments is provided in the Mayor's Accessible London SPG. The London Plan supports LPAs in resisting forms of development which compromise the Mayor's objective to secure a more socially inclusive city, including 'gated communities'¹²⁰.

¹¹⁹ Transport for London. Improving the health of Londoners. Transport action plan.

¹²⁰ Mayor of London London Plan 2015 *ibid* para 3.60

2.2.8 Shared space is often an effective approach to create good quality public realm. The principles of shared space involve decluttering the streetscape by removing unnecessary obstacles and de-cluttering the area from excessive street signage and furniture, all of which have benefits in terms of access and can add to inclusive design. In terms of inclusive design, the removal of kerbs can be problematic. Kerbs provide many disabled people with the confidence that they are segregated from traffic, and kerbs can provide blind and partially sighted people with a 'shore line' to follow, to help them navigate an area, particularly in the absence of a clear and uncluttered building line to follow at the opposite edge of the pavement. Kerbs are also important as they are required for taxi and bus ramps to be deployed safely and for people stepping down from side access minibus transport. If a shared space is being proposed, careful consideration should be given as to whether the area is suitable for such an approach (taking into account the volume of pedestrian compared to traffic flows, and types of traffic using the area i.e. bicycles, buses and so forth). This will include ensuring that any shared space does not reduce access to important social infrastructure such as local amenities and shops. Stakeholder engagement is a critical part of the design process, to allow development proposals to address the needs of disabled people. An Equality Impact Assessment should be undertaken to ensure that the needs of all those with 'protected characteristics' are considered. Schemes should incorporate a 'safe zone', to delineate optional routes especially for pedestrians only, to ensure people have the option of a route they can feel safe using.

Communal and Public Open space

Standard 3 - Development proposals should demonstrate that they comply with the LPAs' open space strategies, ensuring that an audit of surrounding open space is undertaken and that where appropriate, opportunities to help address a deficiency in provision by providing new public open spaces are taken forward in the design process.

Standard 4 - Where communal open space is provided, development proposals should demonstrate that the space:

is overlooked by surrounding development;

is accessible disabled people including people who require level access and wheelchair users;

is designed to take advantage of direct sunlight;

has suitable management arrangements in place.

2.2.9 Public, communal and private open spaces should be protected and enhanced, and where possible new open spaces should be created. This is supported by Policy 2.18 Green Infrastructure, Policy 7.18 Protecting open space, Policy 7.19 Biodiversity and Policy 7.21 Trees and Woodlands. The planning system can help manage and promote existing spaces, and provide new ones by, for example,

making sure that new developments provide green amenity spaces including for wildlife and play areas for children identified as priorities in Green Grid frameworks.

- 2.2.10 Designers and developers should undertake a review of existing open spaces in the area and take account of the requirements set by individual LPAs in their Local Development Frameworks and open space strategies, based on the LP Benchmark Public Space Hierarchy [LP Table 7.2]. Large residential developments should be supported by an open space and landscape strategy which considers the full range of possible provision, including outdoor sport and play facilities, local parks and other public spaces¹²¹.
- 2.2.11 Open space, whether for public or private communal use should be designed to be safe, accessible, inviting and well used, without the fear of crime. It should encourage an appropriate sense of ownership and should be managed to ensure that it remains useful and welcoming to all users. The space should be designed at the outset to minimise ongoing management and maintenance costs (but this should not compromise design quality and amenity) and should incorporate appropriate boundary treatments between private gardens and communal spaces. For further information on borough open space strategies please refer to best practice guidance on Open Space Strategies prepared by the Mayor of London and CABE¹²².

Existing gardens

- 2.2.12 Policy 3.5 supports a presumption against development on garden land where this can be locally justified. This is in recognition of the wider roles gardens play in London through their contributions to achievement of wider London Plan policies (see paragraphs 1.2.44– 45 of this SPG). Para 1.2.46 of this SPG provides guidance on the use of strategic planning policy to support local planning approaches to inappropriate subterranean development.

Play space

Standard 5 (and Policy 3.6) – For developments with an estimated occupancy of ten children or more, development proposals should make appropriate play provision in accordance with the Mayor’s Play and Informal Recreation SPG.

- 2.2.13 Policy 3.6 Children and Young People’s Play and Informal Recreation Facilities, seeks to ensure that all children and young people have safe access to good quality, well designed, secure and stimulating¹²³ play and informal recreation

¹²¹ The need for such a strategy should be part of early discussions with boroughs on proposals for more than 150 dwellings and is likely to be a requirement on proposals for more than 500 dwellings/5 ha in line with LP policy 3.7

¹²² Mayor of London. Guide to preparing Open Space Strategies – Best practice guidance of the London Plan. GLA, 2004 and Mayor of London and CABE 2008 *ibid*

¹²³ For example, see London Sustainable Development Commission. Sowing the Seeds – reconnecting

provision. Housing development proposals are expected to make appropriate provision for play and informal recreation based on the expected child population generated by their scheme and an assessment of future needs.

- 2.2.14 The Mayor's Play and Informal Recreation SPG provides further advice to LPAs and developers on the implementation of Policy 3.6. It provides guidance on estimating child occupancy from new residential developments and advises on the levels and types of play provision required for different age groups. This is based on the accessibility of existing facilities and a minimum benchmark of 10 sqm of dedicated play space provision per child. This strategic benchmark can be adjusted at a borough level, in line with a local play strategy and supporting audit.
- 2.2.15 The Play and Informal Recreation SPG outlines the Mayor's expectation for on-site play provision to be provided wherever possible. However, it recognises that provision on-site will depend on a range of factors. This includes; the size of a development and the anticipated number of children alongside the consideration of potential improvements to the quantity, quality and accessibility of existing off-site facilities, where these are within a reasonable distance from a proposed development¹²⁴.
- 2.2.16 The Play SPG suggests that there should be a clear requirement for all new residential developments generating more than 10 children to provide suitable play space as part of a new development.¹²⁵ Tables 4.5 to 4.7 of the Play SPG set out criteria to inform the type, quantity and location of required play provision for different age groups, placing particular emphasis on securing on-site provision for children under 5, unless existing provision is within 100m of a development¹²⁶. The Play SPG criteria should be used together with the supporting calculator to estimate the provision required from new development, taking into account the above standard. Developments with an estimated child occupancy of less than 10 children should be required to make an appropriate financial contribution to off-site play provision in line with Policy 3.6 and the Play SPG.¹²⁷ This should be secured through planning obligations or Community Infrastructure Levy.
- 2.2.17 Play space and routes to play space should be accessible to, and usable by, disabled children and disabled parents. Disabled children are often prevented from getting into and using play space by the existence of steps, a lack of parking, dropped kerbs, a lack of wide smooth level paths around and to play equipment and the lack of accessible toilets¹²⁸. Further guidance on this is provided in the

London's children with nature. GLA, 2011

¹²⁴ Mayor of London, Play and Informal Recreation SPG, GLA, 2012, paragraph 4.37 – 4.41

¹²⁵ Mayor of London, Play and Informal Recreation SPG, GLA, 2012, paragraph 5.10

¹²⁶ Mayor of London, Play and Informal Recreation SPG, GLA, 2012, pages 63-67

¹²⁷ Mayor of London, Play and Informal Recreation SPG, GLA, 2012, paragraph 5.10

¹²⁸ Goodridge, Clare; Ed. Douch, Philip. Inclusion by Design - a guide to creating accessible play and childcare environments. KIDS, 2008 KIDS. Playing Outdoors? Disabled children's views of play pathfinder and playbuilder spaces – An overview of KIDS research. KIDS NDD, 2010

Accessible London SPG.

2.2.18 In all development proposals the long term retention, access to and maintenance of any play space provided should be secured by a legal agreement. There may be scope for innovative solutions if they meet the criteria for quantity, quality and access to play space.

Designing out Crime

2.2.19 The Mayor is committed to ensuring that neighbourhoods and buildings are designed to minimise opportunities for crime and anti-social behaviour. London Plan Policy 7.3 Designing out Crime requires development proposals to take account of the principles set out in national guidance and Secured by Design¹²⁹. Buildings and spaces should deter criminal opportunism and provide residents with an increased sense of security, without being intimidating or reliant on excessive management.

2.2.20 Development proposals should reduce opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating. For example they should not introduce excessive physical or perceived barriers to access or by creating a fortress environment. Proposals will be expected to address issues around the fear of crime as well as minimising potential crime itself through good design. More generally, community engagement in the preparation of proposals can increase ownership of, and responsibility for, the local environment.

Housing for a diverse city

Density

Standard 6 (and Policy 3.4) - Development proposals should demonstrate how the density of residential accommodation satisfies London Plan policy relating to public transport access levels (PTALs) and the accessibility of local amenities and services, and is appropriate to the location

2.2.21 Part 1 of this SPG provides guidance on the implementation of Policy 3.4 Optimising Housing Potential. Density is also a key design matter within Policy 3.5, Part B. Development proposals should optimise density in accordance with the density matrix of Policy 3.4 by taking into account the local context and character, public transport accessibility PTALs, and the design standards of this part of the SPG.

¹²⁹ Association of Chief Police officers. Secured by Design, New Homes 2010

Residential Mix

Standard 7 (and Policy 3.8) - Development proposals should demonstrate how the mix of dwelling types and sizes and the mix of tenures meet strategic and local need and are appropriate to the location.

- 2.2.22 Development proposals should seek to ensure they meet local needs by providing an adequate mix of dwelling sizes (in terms of occupancy defined in terms of bedspaces), and mix of tenures to reflect local and strategic demand. Local dwelling mix policies which take into account design occupancy provide an important complementary mechanism to secure the effective implementation of occupancy related space standards.
- 2.2.23 Lifetime neighbourhood principles set out under Policy 7.1 also encourage the provision of a broad range of adaptable homes and for new development to maximise opportunities for community diversity, inclusion and cohesion. This aims to ensure new and existing neighbourhoods meet the requirements of residents through all stages of their lives in terms of the mix of dwellings, tenures and supporting infrastructure and facilities.
- 2.2.24 It is important to recognise certain locations and types of buildings may be particularly suitable for smaller households, for example town centres and other locations where there is good public transport access (see paragraphs 1.3.17 and 7.4.9-11 of this SPG).
- 2.2.25 Whilst there are inherent benefits in providing larger family housing at relatively low densities, it is possible to successfully accommodate family homes within higher density schemes, where these units are carefully located and designed. For example, ground level family maisonettes, duplex apartments or terraced houses can be provided within schemes of much higher densities, with front doors at street level, private gardens and play space provided either in communal areas or public open space, with good overlooking from family units. This also provides a number of advantages in terms of natural surveillance (see standard 10).
- 2.2.26 Where family units are provided on the upper floors it is important to ensure appropriate private open space is provided with adequate outlook, orientation, and privacy. Social infrastructure including child care and primary schools should be accessible and within a safe and convenient walking distance.
- 2.2.27 Where proposals include specialist housing for older people, it is important to consider potential benefits this may provide in terms of encouraging older person households under-occupying family homes to downsize and thereby free up these properties for families. Part 3 of this SPG provides guidance on delivering homes to meet the needs of older people.
- 2.2.28 The London Plan underscores the need to resist developments which might compromise objectives to secure a more socially inclusive city eg 'gated communities' (paragraph 3.60), and the need for affordable housing to be
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integrated with the rest of the development and have the same external appearance as other housing (see London Plan paragraph 3.76).

2.3 DWELLINGS (POLICY 3.5, PART C)

2.3.1 Paragraph C of Policy 3.5 sets out an approach to the design of individual dwellings and shared spaces within buildings. It incorporates Government's nationally described space standard¹³⁰, adopted through MALP, which new dwellings are required to meet, and outlines considerations relating to the size and layout of rooms in a dwelling, the 'approach', the 'home as a place of retreat', and climate change mitigation and adaptation.

From street to front door

2.3.2 The 'arrival' at a building, the design of shared circulation and lift access, car parking provisions and areas for cycle storage are important factors in making housing safe and secure, welcoming and accessible for all. The standards recognise that many new homes in London will be flats, and that the design of the shared circulation areas will be critical to the success of new developments. Many of these standards are based on accessibility and adaptability principles, which have been requirements for new housing in London for a number of years.

Entrance and approach

Standard 8 - All main entrances to houses, ground floor flats and communal entrance lobbies should be visible, clearly identifiable, and directly accessible from the public realm.

Standard 9 - The distance from the accessible car parking space of standard 18 to the home or to the relevant block entrance or lift core should be kept to a minimum and should be preferably level or where level is not possible, gently sloping (1:60 – 1:20) on a suitable ground surface.

Active frontages

Standard 10 – Active frontages should be maximised and inactive frontages minimised on the ground floor of buildings facing publically accessible space, in order to provide natural surveillance and activity.

2.3.3 Active frontages are defined as development frontage on the ground floor where inhabited residential or non-residential uses are located, with a visually permeable elevation (eg windows or glazing) and a generous distribution of entrances.

2.3.4 The principle of maximising active frontages and minimising inactive frontages is a critical element of the London Plan's approach to designing out crime (Policy 7.3) and applies with equal importance to residential and mixed use neighbourhoods. This approach is supported in the Town Centres SPG.

¹³⁰ DLG. Technical housing standards – nationally described space standard. 2015

- 2.3.5 As a general rule, the more important an area of publically accessible space abutting a building in terms of pedestrian activity is, the more important it will be to minimise inactive frontages and encourage natural surveillance and activity. Where inactive frontages have to be located on the ground floor these should be interspersed with active frontages and/or carefully located to minimise their overall impact on the public realm. Long contiguous stretches of inactive frontage facing the public realm reduce perceptions of pedestrian safety and can attract anti-social behaviour, and should therefore be avoided.
- 2.3.6 The provision of ground floor residential units with front doors and windows directly fronting onto the public realm provides a number of significant advantages in terms of natural surveillance, activity and residents' social interaction and will be strongly supported where suitable and achievable. On high density schemes, this can help to wrap inactive frontages associated with car or cycle parking and refuse areas. In mixed use development, non-residential ground floor land uses should provide active frontages when facing publically accessible space.
- 2.3.7 In applying this standard to dwellings, it is important to also consider potential noise, privacy and air quality issues (see standards 28, 30 and 33), particularly those associated with busy roads or adjacent land uses or activities, which may necessitate residential units being raised slightly from the ground floor. Given residential privacy issues associated with placing ground floor bedrooms fronting the public realm, living rooms or kitchens may provide a more suitable alternative. In terms of generating street activity, it is preferable for ground floor residential units to have their main entrances (including individual doorbells and post boxes) fronting the street, rather than be accessed from internal corridors

Access

Standard 11 90 per cent of new build housing should meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings' with the remaining 10 per cent meeting Building Regulation requirement M4(3) 'wheelchair user dwellings'.

- 2.3.8 Part M of the Building Regulations (Volume 1) is divided into three categories; M4(1) 'visitable dwellings', M4(2) 'accessible and adaptable dwellings' and M4(3) 'wheelchair user dwellings'. As set out in Policy 3.8, 90 per cent of new build homes in London should meet M4(2) with the remaining 10 per cent meeting M4(3). This means that 100 per cent of new build homes should be accessible. This standard only applies to new build homes because Part M of the Building Regulations generally does not apply to dwellings resulting from conversions or a change of use. The relevant category must be stipulated in a condition applied to the planning permission. Detailed guidance on how to meet these requirements is set out in Approved Document Part M¹³¹ and is not repeated in this SPG.

¹³¹ HM Government. The Building Regulations. Access to and use of buildings. Approved Document M. Volume 1: Dwellings. 2015 Edition.

2.3.9 The London Plan promotes the delivery of a wide range of housing design and typology and has the flexibility to encourage innovative approaches. It also recognises that the application of M4(2), which requires level access, may have particular implications for developments of four storeys or less, where historically the London Plan did not require lifts. Research indicates that the provision of lifts does not necessarily have a significant impact on viability and does not necessarily lead to a significant increase in service charges¹³².

2.3.10 LPAs should seek to ensure that dwellings accessed above or below the entrance storey in buildings of four storeys or less have step-free access. However, in certain specific cases, the provision of a lift where necessary to achieve this aim, may cause practical difficulties, make developments unviable and/or have significant implications for the affordability of service charges for intended residents. Analysis of the viability and affordability impacts of M4(2) may require 'bespoke' assessments of site-specific circumstances. Where necessary, for developments of four stories or less, the requirements of Policy 3.8Bc should be applied flexibly to ensure that residential or mixed use development is deliverable. This may bear particularly on the following types of schemes;

- Flats above shops or garages, stacked maisonettes and low rise blocks of flats where the potential for deck access to lifts is restricted;
- small-scale infill developments, where the depth and width of a plot and height restrictions may inhibit the overall floorplate and massing of a building and the number of units which can be provided on a particular site/grouped around the same core (eg. gap sites adjacent to existing residential dwellings or in a conservation area);
- new units as a result of upward extensions to existing residential homes and flats.

2.3.11 If proposals do not include step free access they should clearly demonstrate that achieving step free access would make the development unviable or would mean that service charges are not affordable for the intended residents. If the LPA accepts this then the base Building Regulation M4(1) could be applied. All other standards in this SPG should continue to be applied.

2.3.12 It should also be noted that the Planning Practice Guidance¹³³ is clear that M4(3) wheelchair user dwellings can be applied to all tenures. However, M4(3) is divided into two categories; 'wheelchair accessible' (a home readily useable by a wheelchair user at the point of completion) and 'wheelchair adaptable' (a home that can be easily adapted to meet the needs of a household including wheelchair

¹³² David Lock Associates, Hoare Lea, Gardiner & Theobald. Greater London Authority Housing Standards Review: Viability Assessment. GLA May 2015

¹³³ The National Planning Practice Guidance (Housing- Optional Technical Standards) Paragraph: 009

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users). The Planning Practice Guidance¹³⁴ states that Local Plan policies for **wheelchair accessible homes** should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling (generally this will be social and affordable rented units). This means that market units can only be required to meet the standards for **wheelchair adaptable homes**.

Shared Circulation

Standard 12 - Each core should be accessible to generally no more than eight units on each floor.

Standard 13 - An access core serving 4 or more dwellings should provide an access control system with entry phones in all dwellings linked to a main front door with electronic lock release. Unless a 24 hour concierge is provided, additional security measures including audio-visual verification to the access control system should be provided where any of the following apply:

more than 25 dwellings are served by one core, or

the potential occupancy of the dwellings served by one core exceeds 100 bed spaces, or

more than 8 dwellings are provided per floor¹.

Standard 14 - Where dwellings are accessed via an internal corridor, the corridor should receive natural light and adequate ventilation where possible.

Standard 15 - All dwellings entered at the seventh floor (eighth storey) and above should be served by at least two lifts.

Standard 16 - It is desirable that every wheelchair user dwelling is served by more than one lift.

¹ Based on: Secured by Design, ibid

2.3.13 Given the choice, many people, and most families, would prefer to live in a home with a private front door at ground level entered directly from the street or another public space. The challenge for higher density housing is to give some of the benefits of a private house (including privacy, security, a clear identity and private open space) to people living in apartments. In doing this account should be taken of the needs of disabled people e.g. in positioning access control systems so they can be used by as many people as possible.

2.3.14 With good design, control of numbers, and careful balancing of dwelling types, all forms of shared circulation can result in successful housing. How dwellings are grouped can have far-reaching implications for the social dynamics of a

¹³⁴ National Planning Practice Guidance (Housing- Optional Technical Standards) Paragraph: 009

building; maintenance and security arrangements; and the privacy, comfort and satisfaction of residents.

2.3.15 Important considerations for shared circulation include:

- The number of people sharing a circulation core and landing will affect whether residents have a sense of ownership over the space;
- Design considerations including width, enclosure, view, light and ventilation of circulation spaces;
- The number and size of lifts; the type of access control and other security measures; and
- Management arrangements for maintenance, cleaning and security.

Car parking

Standard 17 - The maximum standards set out below should be the basis for considering planning applications

Parking for residential development						
	PTAL 0 to 1		PTAL 2 to 4		PTAL 5 to 6	
	150-200 hr/ha	Parking provision	150-250 hr/ha	Parking provision	200-350 hr/ha	Parking provision
Suburban						
3.8-4.6 hr/unit	35-55 u/ha	Up to 2 spaces per unit	35-65 u/ha	Up to 1.5 spaces per unit	45-90 u/ha	Up to one space per unit
3.1-3.7 hr/unit	40-65 u/ha		40-80 u/ha		55-115 u/ha	
2.7-3.0 hr/unit	50-75 u/ha		50-95 u/ha		70-130 u/ha	
Urban	150-250 hr/ha		200-450 hr/ha		200-700 hr/ha	
3.8-4.6 hr/unit	35-65 u/ha	Up to 1.5 spaces per unit	45-120 u/ha	Up to 1.5 spaces per unit	45-185 u/ha	Up to one space per unit
3.1-3.7 hr/unit	40-80 u/ha		55-145 u/ha		55-225 u/ha	
2.7-3.0 hr/unit	50-95 u/ha		70-170 u/ha		70-260 u/ha	
Central	150-300 hr/ha		300-650 hr/ha		650-1100 hr/ha	
3.8-4.6 hr/unit	35-80 u/ha	Up to 1.5 spaces per unit	65-170 u/ha	Up to one space per unit	140-290 u/ha	Up to one space per unit
3.1-3.7 hr/unit	40-100 u/ha		80-210 u/ha		175-355 u/ha	
2.7-3.0 hr/unit	50-110 u/hr		100-240 u/ha		215-405 u/ha	

Maximum residential parking standards			
number of beds	4 or more	3	1-2
parking spaces	up to 2 per unit	up to 1.5 per unit	less than 1 per unit

Notes:
 All developments in areas of good public transport accessibility (in all parts of London) should aim for significantly less than 1 space per unit
 Adequate parking spaces for disabled people must be provided preferably on-site³
 20 per cent of all spaces must be for electric vehicles with an additional 20 per cent passive provision for electric vehicles in the future.
 In outer London areas with low PTAL (generally PTALs 0-1), boroughs should consider higher levels of provision, especially to address 'overspill' parking pressures.

Standard 18 - Each designated wheelchair accessible dwelling should have a car parking space that complies with Part M4 (3).

Standard 19 - Careful consideration should be given to the siting and organisation of car parking within an overall design for open space so that car parking does not negatively affect the use and appearance of open spaces.

2.3.16 Design of parking is an important consideration to ensure that provision complements development as a whole. Transport for London intends to provide separate advice on parking design. In policy terms, the Plan seeks to ensure an appropriate balance between enabling adequate parking provision whilst not undermining the use of alternative transport modes (walking, cycling and public transport). The flexibility inherent in striking this balance is an important consideration when coming to a view on an appropriate point within the range of provision set out in the standards and, more generally, in the way the standards are implemented in light of local circumstances and broader policy considerations including the Plan's approach to air quality and especially in low PTAL suburban neighbourhoods in outer London (generally PTAL 0-1 and exceptionally parts of PTAL 2). Such sensitivity resonates with the approach proposed in the NPPF while recognising that in the unique circumstances of London parking is also a strategic issue. Further guidance on implementation of Policy 6.13 Parking is given in the Plan's Parking Addendum to Chapter 6 which summarises maximum standards for dwellings of different sizes. This takes account of the Minor Alterations to the London Plan which require Boroughs to take account of the distinct parking circumstances of those parts of outer London with particularly low public transport accessibility and provides flexibility in addressing them. The Accessible London SPG provides further detailed guidance on parking provision for disabled people.

2.3.17 For the avoidance of doubt, the second part of Table 6.2 above relating bedrooms to parking spaces 'nests' within the (coloured) matrix which provides the overarching framework to relate parking provision, accessibility (PTAL), development and local **character**.

Cycle storage

Standard 20 (Policy 6.9)- All developments should provide dedicated storage space for cycles at the following level:

1 per studio and one bed

2 per all other dwellings.

In addition, one short stay cycle parking space should be provided per 40 units.

Standard 21 - Individual or communal cycle storage outside the home should be secure, sheltered and adequately lit, with convenient access to the street. Where cycle storage is provided within the home, it should be in addition to the minimum GIA and minimum storage and circulation space requirements. Cycle storage identified in habitable rooms or on balconies will not be considered acceptable¹.

¹ For more detail see: Transport for London Cycle Design Standards available from <https://tfl.gov.uk/rate/publications-and-reports/cycling>

2.3.18 Policy 6.9 Cycling requires development proposals to provide secure, integrated

and accessible cycle parking facilities for all land use classes. This requirement is important to delivering Mayoral aspirations for a significant increase in cycling in London. Developers and boroughs are also encouraged to make provision, with a charging facility, for mobility scooters.

Refuse and recycling facilities

Standard 22 - Communal refuse and recycling containers, communal bin enclosures and refuse and recycling stores should be easily accessible to all residents including children and wheelchair users, and located on a hard, level surface. The location should satisfy local requirements for waste collection. Refuse and recycling stores within buildings should be located to limit the nuisance caused by noise and smells and maintained to a high hygiene standard.

Standard 23 - Storage facilities for waste and recycling containers should be provided in accordance with local authority requirements and meeting at least British Standard BS5906:2005 Code of Practice for waste management in Buildings.

2.3.19 London Plan Policy 5.17E requires the provision of suitable waste and recycling storage facilities in all new developments. Refuse, green waste, food waste and recycling is a rapidly changing field and there remain significant variations in local authority requirements, which need to be identified and understood at an early design stage. From January 2015, waste collection authorities are required to collect waste paper, metal, plastic and glass separately as a minimum in order to increase the quality and quantity of recycled material and reduce contamination (e.g. from food waste). The provision and design of waste recycling facilities within residential developments should support and enable collection authorities to meet this requirement.

2.3.20 The management of waste and recycling in flatted developments poses particular challenges and needs to be factored into the design of individual dwellings and buildings at an early stage with adequate, accessible and convenient waste and recycling storage and collection facilities provided¹³⁵. Measures should be put in place to manage impacts on residential amenity to acceptable levels in terms of odour, noise and dust and address potential safety, security and hygiene issues. The use of separate chute systems and/or waste compactors and material balers may be appropriate in flatted developments. Adequate provision should be made for the storage and management of bulky waste.

Dwelling space standards

Standard 24 All new dwellings should meet the nationally described space standard¹.

¹ DCLG. Technical housing standards - nationally described space standard. 2015

¹³⁵ See <http://www.lwarb.gov.uk/wp-content/uploads/2015/05/Template-waste-management-strategy-new-build-flats-FINAL.pdf> for a template recycling and waste management strategy for new build flats.

2.3.21 LP Policy 3.5 specifically underscores the importance of dwelling space standards as a policy concern. The nationally described space standard¹³⁶, together with the other standards set out in this SPG are intended to ensure that all new homes are functional and fit for purpose and offer the potential to be occupied over time by households of all tenures.

2.3.22 The MALP adopted the **nationally described space standard**¹³⁷ and strongly encourages ceiling heights of at least 2.5metres (see standard 31). The nationally described space standard sets out requirements for the Gross Internal (floor) Area of new dwellings at a defined level of occupancy as well as floor areas and dimensions for key parts of the home, notably bedrooms and storage. As this standard is set by Government and clearly set out in the Technical housing standards -nationally described space standard document¹³⁸ the details of the standard are not repeated in this SPG.

2.3.23 In addition to adopting the nationally described standards the Plan states that when designing homes with more than eight persons/bedspaces, developers should allow approximately 10 sq m per extra bedspace/person.

2.3.24 When considering the design and layout of homes, as well as meeting the nationally described space standard, plans should also take account of the requirements of the furniture schedule in Appendix D of Approved Document Part M¹³⁹ as homes will need to be designed in a way that can meet both the space and access requirements.

Standard 25- Dwelling plans should demonstrate that dwellings will accommodate the furniture, access and activity space requirements relating to the declared level of occupancy and the furniture schedule set out in Approved Document Part M.

2.3.25 The space standards are minima and should be exceeded where possible. They should be a basis for promoting innovative thinking about designing space and how it is to be used within the home. These standards will not have a significant impact on build costs or the number of units possible on a site in relation to practice before the introduction of space standards in London¹⁴⁰. The only exception may be for very small schemes (for example, of less than 10 units) that have significant site constraints, in which case it may be considered justifiable to make a judgment about compliance with the space standards against wider policy issues, such as housing delivery and viability.

¹³⁶ DCLG. Technical housing standards - nationally described space standard. 2015

¹³⁷ *ibid*

¹³⁸ DCLG. Technical housing standards - nationally described space standard. 2015 <https://www.gov.uk/government/publications/technical-housing-standards-nationally-described-space-standard>

¹³⁹ HM Government. The Building Regulations. Access to and use of buildings. Approved Document M. Volume 1: Dwellings. 2015 Edition.

¹⁴⁰ See GVA Grimley Housing Design Guide Cost and Delivery Impact Assessment 2010 and DLA et al Viability Assessment 2015 *ibid*

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- 2.3.26 The minimum recommended GIA for a one person dwelling with a bathroom is 39 sq m and with a shower room 37 sq m. Policy 3.5 does not preclude development of single person homes of less than 37 sq m but makes clear that these should be of otherwise exemplary design and make significant contributions towards achievement of the Plan's wider objectives. These one person units must be exceptional in the context of overall housing provision and clearly justified by local circumstances - for example, demonstrable need for single person dwellings as part of the overall housing mix in a scheme, or in a particular location. Such units must clearly embody exemplary design standards in line with the standards in this SPG and design policies in chapter 7 of the London Plan; the extent to which such a proposal meets these standards should be assessed by a design officer or design panel review. They should also be clearly marketed as one person dwellings.
- 2.3.27 As the space standard is based on occupation, LPAs are encouraged to include occupancy in their dwelling mix policies, taking account of location and context which may alter the type of dwelling mix suited to a particular area or site.
- 2.3.28 The nationally described space standard GIAs incorporate combined floor areas for living/kitchen/dining space corresponding to the occupancy of a dwelling. In accordance with Policy 3.5 and 7.2 An Inclusive Environment, new homes should be designed to allow sufficient flexibility to adapt to residents' changing needs and circumstances. In practice, this means carefully considering the location of doors, windows and built-in furniture, and making individual rooms large enough and wide enough to accommodate furniture in a usable way. Thoughtful design can allow the potential for spaces to be linked or separated by positioning structural supports to allow new openings in internal walls, or by creating easily demountable partitions which are clear of services.
- 2.3.29 To give residents flexibility, when developing larger dwellings (those for 5 people or more), developers are encouraged to consider providing two living spaces, for example a living room and a kitchen-dining room. If a kitchen is adjacent to the living room, it can allow for reconfiguration as an open plan arrangement. Studies should not be considered as second living spaces. Ideally, all double and twin bedrooms should have a minimum width of 2.75m to allow sufficient space for a wheelchair user to pass the foot of the bed when the head is placed against the side wall. Dwellings designed for a potential occupancy of 5 people or more are encouraged to include at least one bathroom with WC and one additional WC.
- 2.3.30 New development proposals should recognise changing work patterns and advancements in Information and Communications Technology (ICT) and provide adequate space for home working, including space for children and students to do homework and study, and space for adults to undertake equivalent office based work. As set out in the Plan Mayor will support the development and extension of high speed connectivity. Development proposals should ensure competitive connectivity.
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Private open space

Standard 26 - A minimum of 5sqm of private outdoor space should be provided for 1-2 person dwellings and an extra 1sqm should be provided for each additional occupant.

Standard 27 - The minimum depth and width for all balconies and other private external spaces should be 1500mm.

- 2.3.31 Private open space is highly valued and should be provided in all new housing developments. Minimum private open space standards have been established in the same way as the internal space standards, by considering the spaces required for furniture, access and activities in relation to the number of occupants. The resultant space should be of **practical shape and utility** and care should be taken to ensure the space offers good amenity. This space does not count towards the GIA used in calculating the internal space standard 24.
- 2.3.32 In exceptional circumstances, where site constraints make it impossible to provide private open space for all dwellings, a proportion of dwellings may instead be provided with additional internal living space equivalent to the area of the private open space requirement. This area must be added to the minimum GIA. Enclosing balconies as glazed, ventilated winter gardens can be considered an acceptable alternative to open balconies and is recommended for all dwellings exposed to NEC noise category C or D¹⁴¹. Winter gardens must have a drained floor and must be thermally separated from the interior. Provision for outdoor gardens should be set in the context of local standards.
- 2.3.33 Dwellings on upper floors should all have level access to a terrace, roof garden, winter garden, courtyard garden or balcony. The use of roof areas for additional amenity or garden space is encouraged (including green roofs, see below). Houses and ground floor flats should preferably have private gardens.

Home as a place of retreat

- 2.3.34 Policy 3.5 requires design of new housing developments to consider elements that enable the home to become a comfortable place of retreat. Surrounded by the noise and activity of daily life in London, it is hard to make homes that offer people a place to withdraw from the city. Even in the suburbs, traffic noise and adjacent uses can sometimes hamper the quiet enjoyment we want from our homes.
- 2.3.35 Natural light is also vital to a sense of wellbeing in the home, and this may be restricted in densely developed parts of the city. The Mayor seeks to encourage the kind of housing that provides comfortable and enjoyable places of retreat and privacy. Factors to be considered include privacy, the importance of dual aspect development, noise mitigation, floor to ceiling heights, daylight and sunlight.

¹⁴¹ DCLG NPPF 2012 ibid para 123. DEFRA. Noise Policy Statement for England. Explanatory Note. DEFRA, 2010

Privacy

Standard 28 - Design proposals should demonstrate how habitable rooms within each dwelling are provided with an adequate level of privacy in relation to neighbouring property, the street and other public spaces¹.

¹ Based on: Secured by Design op cit

2.3.36 Design and access statements should demonstrate how the design as a whole uses a variety of measures to provide adequate visual and acoustic privacy for every home in a development. Designers should consider the position and aspect of habitable rooms, gardens and balconies, and avoid windows facing each other where privacy distances are tight. In the past, planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18 – 21m between facing homes (between habitable room and habitable room as opposed to between balconies or terraces or between habitable rooms and balconies/terraces). These can still be useful yardsticks for visual privacy, but adhering rigidly to these measures can limit the variety of urban spaces and housing types in the city, and can sometimes unnecessarily restrict density¹⁴². It will often be beneficial to provide a set-back or buffer where habitable rooms directly face a public thoroughfare, street, lane or access deck. Privacy is also an important consideration in the design of private open space.

Dual aspect

Standard 29 Developments should minimise the number of single aspect dwellings. Single aspect dwellings that are north facing, or exposed to noise levels above which significant adverse effects on health and quality of life occur, or which contain three or more bedrooms should be avoided¹.

¹ PPG 24 1994 *ibid*. See also CLG NPPF 2012 *ibid* para 123 DEFRA. Noise Policy Statement for England. Explanatory Note. DEFRA, 2010

2.3.37 Dual aspect dwellings with opening windows on at least two sides have many inherent benefits. These include better daylight, a greater chance of direct sunlight for longer periods, natural cross ventilation and a greater capacity to address overheating, mitigating pollution, offering a choice of views, access to a quiet side of the building, greater flexibility in the use of rooms, and more potential for future adaptability by altering the use of rooms. Where possible the provision of dual aspect dwellings should be maximised in a development proposal.

2.3.38 A dual aspect dwelling is defined as one with openable windows on two external walls, which may be either on opposite sides of a dwelling or on adjacent sides of a dwelling where the external walls of a dwelling wrap around the corner of a building (the provision of a bay window does not constitute dual aspect). One aspect may be towards an external access deck or courtyard, although the

¹⁴² Maccreevor Lavington Architects, Emily Greeves Architects, Graham Harrington. Housing Density Study. GLA, 2012

layout of the dwelling needs to be carefully considered in these cases to maintain privacy.

- 2.3.39 Single aspect dwellings are more difficult to ventilate naturally and more likely to overheat (see Standard 29 and Policy 5.9). This is an increasing concern in London due to anticipated temperature increases related to climate change, coupled with the urban heat island effect that is experienced in high density areas of the city. The design of single aspect flats will need to demonstrate that all habitable rooms and the kitchen are provided with adequate ventilation, privacy and daylight and the orientation enhances amenity, including views. North facing¹⁴³ single aspect dwellings should be avoided wherever possible. However, in applying this standard consideration should also be given to other planning and design objectives for a site, for example the aim to maximise active frontages and minimise inactive frontages.
- 2.3.40 Good single aspect one and two bedroom homes are possible where limited numbers of rooms are required, the frontage is generous, the plan is shallow, the orientation and or outlook is favourable, and care is taken to mitigate the potential for overheating without the need for mechanical cooling. Single aspect dwellings may also be appropriate when being used to wrap podium level car parks or large retail units with active frontages.
- 2.3.41 In single aspect dwellings with more than two bedrooms it is difficult to achieve adequate natural ventilation and daylight to all rooms in an efficient plan layout which avoids long internal corridors. Single aspect dwellings containing three or more bedrooms should therefore be avoided. The design of single aspect ground floor dwellings will require particular consideration to maintain privacy and adequate levels of daylight.

Noise

Standard 30 (and Policy 7.15) - The layout of adjacent dwellings and the location of lifts and circulation spaces should seek to limit the transmission of noise to sound sensitive rooms within dwellings.

- 2.3.42 Policy 7.15 Reducing and Managing Noise, Improving and Enhancing the Acoustic Environment and Promoting Appropriate Soundscapes requires development proposals to seek to reduce noise and manage the effects of noise to improve health and quality of life. It is another important aspect of retreat and privacy in a dwelling. Noise from the street and adjoining properties can cause stress, sleep disturbance and friction between neighbours as recognised in the NPPF¹⁴⁴.
- 2.3.43 All dwellings should be built with acoustic insulation and tested to current Building Regulations standards¹⁴⁵. However, acoustic insulation should not be relied upon

¹⁴³ 'North facing' is usually defined as an orientation less than 45 degrees either side of due north.

¹⁴⁴ CLG NPPF 2012 ibid para 123

¹⁴⁵ For further guidance please refer to: BRE Acoustics. Improving Sound Insulation in Homes, <http://www.bre.co.uk>

as the only means of limiting noise and the layout and placement of rooms within the building should be considered at an early stage in the design process to limit the impact of external noise on bedrooms and living rooms. The impact of noise should also be considered in the placement of private external spaces.

Floor to ceiling heights

Standard 31 – A minimum ceiling height of 2.5 metres for at least 75% of the gross internal area is strongly encouraged.

2.3.44 Table 3.3 of the Minor Alterations recognises that ceiling heights are an important element in the design of a dwelling in the unique circumstances of London. They can help offset issues associated with its distinct higher densities and effects of climate change by positively impacting on how spacious, light and comfortable the dwelling is. High ceilings can improve the amount and quality of natural light and ventilation and provide flexibility in the use of a room. Therefore, a ceiling height of 2.5 meters is strongly encouraged in London

Daylight and sunlight

Standard 32 - All homes should provide for direct sunlight to enter at least one habitable room for part of the day. Living areas and kitchen dining spaces should preferably receive direct sunlight.

2.3.45 Daylight enhances residents' enjoyment of an interior and reduces the energy needed to provide light for everyday activities, while controlled sunlight can help to meet part of the winter heating requirement. Sunlight is particularly desirable in living areas and kitchen dining spaces. The risk of overheating should be taken into account when designing for sunlight alongside the need to ensure appropriate levels of privacy. In addition to the above standards, BRE good practice guidelines and methodology¹⁴⁶ can be used to assess the levels of daylight and sunlight achieved within new developments, taking into account guidance below and in Section 1.3.

2.3.46 Where direct sunlight cannot be achieved in line with Standard 32, developers should demonstrate how the daylight standards proposed within a scheme and individual units will achieve good amenity for residents. They should also demonstrate how the design has sought to optimise the amount of daylight and amenity available to residents, for example, through the design, colour and landscaping of surrounding buildings and spaces within a development.

2.3.47 BRE guidelines¹⁴⁷ on assessing daylight and sunlight should be applied sensitively to higher density development in London, particularly in central and urban settings, recognising the London Plan's strategic approach to optimise housing

[bre.co.uk/pdf/soundins_homes.pdf](https://www.bre.co.uk/pdf/soundins_homes.pdf)

¹⁴⁶ BRE, Site layout planning for daylight and sunlight: a guide to good practice, BRE, 2011

¹⁴⁷ BRE, Site layout planning for daylight and sunlight: a guide to good practice, BRE, 2011

output (Policy 3.4) and the need to accommodate additional housing supply in locations with good accessibility suitable for higher density development (Policy 3.3). Quantitative standards on daylight and sunlight should not be applied rigidly, without carefully considering the location and context and standards experienced in broadly comparable housing typologies in London.

Air quality

Standard 33 (and policy 7.14) - Minimise increased exposure to existing poor air quality and make provision to address local problems of air quality : be at least 'air quality neutral' and not lead to further deterioration of existing poor air quality (such as areas designated as Air Quality Management Areas (AQMAs)).

2.3.48 Policy 7.14 seeks to minimise increased exposure to existing poor air quality and to prevent deterioration of existing poor air quality, including by encouraging 'air quality neutral' new developments¹⁴⁸. Developers should focus on reducing nitrogen oxides (NO_x) and particulates (PM₁₀) from their schemes. During the demolition and construction phase emissions primarily come from the operation of construction vehicles and plant and the generation of dust¹⁴⁹. During the occupation of residential schemes emissions includes those from vehicles and boilers. Exposure to poor air quality can result from the materials used within the dwelling and poor ventilation as well as external sources such as busy roads and industrial uses. Further guidance is provided in the Mayor's Sustainable Design & Construction SPG.

2.3.49 Where schemes cannot have openable windows due to poor air quality or noise restrictions, careful consideration needs to be given to the location of air intake units and any increased potential for overheating in the summer due to the reduced opportunities for natural ventilation.

Climate Change Mitigation and Adaptation

2.3.50 LP Policy 5.3 Sustainable design and construction, requires the highest standards of sustainable design to improve the environmental performance of new development in the capital and improve occupier comfort and affordability, both for heating and preventing the need for cooling in the future. The Mayor expects the design and construction of all new development to make the fullest contribution to the mitigation of, and adaptation to, climate change. This means minimising overheating; reducing flood risk; improving water efficiency; and protecting and enhancing green infrastructure as well as taking steps to minimise carbon dioxide and other greenhouse gas emissions.

¹⁴⁸ See the Mayor's Sustainable Design and Construction Supplementary Planning Guidance for further guidance

¹⁴⁹ See Mayor of London. The Control of Dust & Emissions during Construction & Demolition. Supplementary Planning Guidance. July 2014

Environmental performance

Standard 34 (and Policy 5.3) - All homes should satisfy London Plan policy on sustainable design and construction and make the fullest contribution to the mitigation of and adaptation to climate change.

Energy and CO₂

Standard 35 (and Policy 5.2) - Development proposals should be designed in accordance with the LP energy hierarchy, and should meet the following minimum targets for carbon dioxide emissions reduction.

Year	Improvement on 2013 Building Regulations
2014 - 2016	35 -per cent ¹
2016 - 2036	Zero carbon

¹ As set out in the Mayor's Sustainable Design and Construction SPG 2014 (paragraph 2.4.3) and the Energy Planning - GLA Guidance on preparing energy assessments.

Energy hierarchy

2.3.51 To achieve the targets for minimising carbon dioxide emissions, the Plan outlines a three step energy hierarchy to guide developers on how they may design low or zero carbon development. The hierarchy consists of the following steps:

Step 1. Be lean: use less energy

Step 2. Be clean: supply energy efficiently

Step 3. Be green: use renewable energy

2.3.52 The first step is to 'be lean' by seeking to minimise the carbon dioxide emissions of a development by minimising energy consumption during its construction and occupation. The NPPF and Policy 5.3 Sustainable Design and Construction promote the use of passive design measures such as orientation and site layout, natural ventilation and lighting (see standards under the 'Place of retreat' section above), high thermal mass and solar shading. In line with the first step of the energy hierarchy, all developers should seek to maximise the insulating properties (U-values) of the building fabric, achieve high levels of air tightness, and provide efficient services and lighting to reduce energy demand in dwellings.

2.3.53 The second step is to 'be clean' by seeking to supply the expected energy demands of a development as efficiently as possible. Policy 5.6 Decentralised Energy in Development Proposals requires development proposals to evaluate the feasibility of decentralised energy systems (which may be fed by combined heat and power systems), and where possible to connect to existing district heating networks. The Sustainable Design and Construction (SD&C) SPG and the London Heat Network Manual provide further guidance on the design and delivery

of successful heat networks¹⁵⁰. Where a new combined heat and power system is proposed an air quality assessment may be sought to determine whether any mitigation measures are required to limit any impacts on existing poor local air quality. Further guidance is provided in the SD&C SPG.

2.3.54 The final step of the hierarchy is to 'be green' by incorporating renewable energy technologies in developments. Policy 5.7 Renewable Energy seeks a further reduction in carbon dioxide emissions through the use of renewable energy generated on-site. Developers should seek to utilise the following renewable energy technologies that are considered to be technically feasible in London: energy from waste; photo-voltaics; solar water heating; wind and heat pumps. These technologies should be incorporated wherever feasible and where they contribute to the highest overall carbon dioxide emissions savings for a development proposal, subject to air quality considerations. Where a biomass boiler is proposed, developers are required to provide a detailed air quality assessment in accordance with Policy 7.14 Improving Air Quality. Permission should only be granted for biomass boilers where no adverse air quality impacts are identified (Policy 7.14Be).

2.3.55 In major developments, these design requirements should be demonstrated, as appropriate, in an Energy Assessment. Advice on how to complete an Energy Assessment is provided in the Mayor's Energy Planning guidance¹⁵¹.

Zero carbon homes

2.3.56 As set out in Standard 35 above, for the period 2016 to 2031, London Plan policy 5.2B sets a 'zero carbon' target for residential development. This target was to align with the then expected introduction of 'zero carbon homes' through Part L of the Building Regulations. However, the Government announced¹⁵² (July 2015) that it 'does not intend to proceed with the zero carbon allowable solutions carbon offsetting scheme, or the proposed 2016 increase in on-site energy efficiency standards, but will keep energy efficiency standards under review'. Prior to this (March 2015), as part of the Housing Standards Review, through a Written Ministerial Statement, the Government set out that it expected local planning authorities not to set conditions with requirements above a Code Level 4 equivalent (around 19% improvement on Part L 2013).

2.3.57 The London Plan policy seeking 'zero carbon' homes remains in place and was not changed by the recent Minor Alterations to the London Plan. However, together with other standards 'zero carbon' was tested through the needs and viability assessment¹⁵³ for the Alteration which indicated that the standards

¹⁵⁰ London Heat Network Manual. Mayor of London, 2014. <http://www.londonheatmap.org.uk/Content/Manual.aspx>. Sustainable Design and Construction SPG. Mayor of London, 2014 <https://www.london.gov.uk/priorities/planning/consultations/draft-sustainable-design-and-construction>

¹⁵¹ Mayor of London, Energy Planning, GLA guidance on preparing energy assessments, GLA, 2015

¹⁵² Productivity Plan - Fixing the foundations: creating a more prosperous nation. July 2015 <https://www.gov.uk/government/publications/fixing-the-foundations-creating-a-more-prosperous-nation>

¹⁵³ Greater London Authority Housing Standards review: Viability Assessment. May 2015

would not compromise housing viability. This approach will also help ensure the development industry in London is prepared for the introduction of 'Nearly Zero Energy Buildings' by 2020¹⁵⁴.

Definition

2.3.58 'Zero carbon' homes are homes forming part of major development applications where the residential element of the application achieves at least a 35 per cent reduction in regulated carbon dioxide emissions (beyond Part L 2013) on-site (in line with policy 2.5B). The remaining regulated carbon dioxide emissions, to 100 per cent, are to be off-set through a cash in lieu contribution to the relevant borough to be ring fenced to secure delivery of carbon dioxide savings elsewhere (in line with policy 5.2 E).

Implementation

2.3.59 In line with the implementation date for previous increases in the London Plan carbon dioxide targets and improvements to Part L of the Building Regulations, 'zero carbon' housing will be implemented for Stage 1 schemes from 1st October 2016.

2.3.60 The technical implementation of this policy should be in line with the Mayor's Energy Planning - GLA Guidance on preparing energy assessments (March 2016)¹⁵⁵. The Mayor's Housing Standard's Viability Assessment assumed a carbon off-set price of £60 per tonne of carbon dioxide for a period of 30 years. Where the borough applies a carbon dioxide off-set price of £60 per tonne, it is not considered necessary to carry out a further viability assessment of the policy approach.

Overheating

Standard 36 (and Policy 5.9) - Development proposals should demonstrate how the design of dwellings will avoid overheating without reliance on energy intensive mechanical cooling systems.

2.3.61 In achieving the Standard 35 to minimise carbon dioxide emissions designers must also take care to avoid overheating within dwellings. More energy efficient building designs that effectively retain heat within the home, combined with predicted warmer temperatures mean dwellings can be increasingly at risk of

[file:///homedata/home\\$/cgiusti/Downloads/Housing%20Standards%20Viability.pdf](file:///homedata/home$/cgiusti/Downloads/Housing%20Standards%20Viability.pdf) Greater London Authority Housing Standards review: Evidence of Need. May 2015 [file:///homedata/home\\$/cgiusti/Downloads/Housing%20Standards%20Evidence%20of%20need.pdf](file:///homedata/home$/cgiusti/Downloads/Housing%20Standards%20Evidence%20of%20need.pdf)

¹⁵⁴ As required by the European Energy Performance of Buildings Regulation which requires periodic review of Building Codes to ensure cost optimal review of energy efficiency standards and that all new buildings are 'nearly zero energy buildings' by 2020

¹⁵⁵ <https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/pre-planning-application-meeting-service-0>

overheating, particularly those which are single aspect and exposed to substantial solar gain in the summer. New housing needs to be designed for the climate it will experience over its life, taking into account predicted climate change, the potential for summer heat waves, London's urban heat island effect and the limits of thermal comfort of future residents.¹⁵⁶

- 2.3.62 Consideration should be given at the earliest design stages to how buildings and individual units may be designed or orientated to minimise the risk of excessive solar and internal heat gains within units especially during the summer, ensure acceptable levels of thermal comfort for future occupants, and maximise the potential for natural ventilation. Units facing south but also those orientated towards the west/south-west may be at risk from overheating during hotter months of the year due to the angle of the sun and potential for solar gain, and may necessitate a particularly focused design approach in terms of mitigation.
- 2.3.63 Policy 5.9 Overheating and Cooling outlines the cooling hierarchy developments should follow. This hierarchy is in line with the energy hierarchy in that it firstly seeks to secure design measures to limit internal heat generation. It then seeks passive and low carbon cooling measures before other more energy intensive solutions.
- 2.3.64 Standard 36 on Overheating is complemented by other standards which aim to help reduce overheating. Standard 29 promotes the development of dual aspect dwellings and seeks to minimise the number of single aspect units. Standard 31 establishes minimum floor to ceiling heights to assist with natural ventilation.
- 2.3.65 More detailed guidance on the range of 'passive' and 'active' measures which development can incorporate to avoid homes overheating is set out in the Mayor's Sustainable Design and Construction SPG.¹⁵⁷ The measures outlined include choice of buildings materials, size and location of windows and shading measures. Where community heating is provided, hot water pipes should be well insulated and consideration be given to the location and ventilation of heating equipment to minimise the transfer of heat into a development which could contribute to overheating.
- 2.3.66 In addition, Policy 5.10 Urban Greening and Policy 5.11 Green Roofs and Development Site Environs, seek to promote the use of planting, including green walls and soft landscaping to reduce the degree of heating of the urban environment. Given the increasing number of people living in flats in London, it will be particularly important to keep out door communal and public amenity areas cool in the summer so that they can act as a 'cool retreat'. Recommended measures include: planting deciduous trees to reduce solar gain during the summer months and facilitate solar gain and day light during the winter months;

¹⁵⁶ CIBSE publications TM52 (The Limits of Thermal Comfort) and TM49 (Design Summer Years for London) can assist designers take these considerations into account, alongside other industry guidance.

¹⁵⁷ Greater London Authority. Sustainable Design and Construction SPG, page 76

and providing green roofs which can keep a building cool through their higher thermal mass. Efficient water features can also help keep the urban environment cool.

Water

Standard 37 (and Policy 5.15) - New dwellings should be designed to ensure that a maximum of 105¹ litres of water is consumed per person per day in line with the optional requirement of Part G.

¹ Excluding an allowance of 5 litres or less per head per day for external water use (as set out in MALP and 'optional' Requirement G2 of Schedule 1 to the Building Regulations 2010)

2.3.67 The increasing demand for water coupled with less predictable patterns, and increasing intensity of rainfall is placing pressure on London's water supply and waste water infrastructure. This is addressed by LP Policy 5.14 (2016) and the Sustainable Design & Construction SPG. The target set out in this standard is in line with the lower optional maximum water consumption requirement which is set out in Part G of the Building Regulations from October 2015.

Flooding and drainage

Standard 38 (and Policy 5.12) - Where development is permitted in an area at risk of flooding, it should incorporate flood resilient design in accordance with the NPPF and its associated technical Guidance¹ **whilst ensuring level access is maintained.**

Standard 39 (and Policies 5.11 & 5.13) New development should incorporate Sustainable Urban Drainage Systems and green roofs where practical with the aim of achieving a Greenfield run-off rate, increasing bio-diversity and improving water quality. Surface water run-off is to be managed as close to source as possible.

¹ Technical Guidance to the National Planning Policy Framework, Department for Communities and Local Government, March 2012 or any subsequent guidance on flood risk issued in support of the NPPF

2.3.68 London is prone to flooding from five sources: tidal, fluvial, surface water, sewer and groundwater flooding. Climate change will increase the probability of flooding from the first four sources. Flood risk can be reduced by locating new developments in appropriate places, through design and construction, and by managing surface water run-off. Policy 5.12 Flood Risk Management requires all development proposals within identified flood risk zones (and which conform with NPPF section 10 requirements including interim technical guidance) to incorporate flood resilient design. The LP's Regional Flood Risk Appraisal provides further details¹⁵⁸. The Sustainable Design and Construction SPG outlines standards and design measures to reduce the impact of flooding on new development as well as to ensure new development does not result in or exacerbate flooding elsewhere.

¹⁵⁸ Mayor of London. Regional Flood Risk Appraisal (RFRA) for the London Plan. GLA, 2009

2.3.69 Policy 5.13 Sustainable Drainage requires development proposals to utilise sustainable urban drainage systems (SUDS) to manage surface water runoff¹⁵⁹. A drainage hierarchy is provided to help achieve a reduction in the overall amount of rainfall discharged into the drainage system. A key aim of this policy is to encourage management of as much run-off as possible on-site and explore sustainable methods for managing the remainder as close as possible to the site. Carefully designed green roofs and other SUDS techniques such as permeable pavements and porous surfaces can make a valuable contribution to sustainable drainage with the aim of achieving a 'greenfield' run off rate (see Policy 5.11 Green Roofs and Development Site Environs).

Materials

2.3.70 The environmental impact of building materials is a specific consideration in Plan Policy 5.3 Sustainable Design and Construction. The Mayor's Sustainable Design and Construction SPG provides more detail on minimising the environmental impact of materials in construction and minimising waste. The six key measures are:

- managing existing resources, such as the re-use and recycling of existing materials on-site
- selecting environmentally sensitive materials, including through the BRE Green Guide to Specification
- selecting materials that are responsibly sourced
- selecting materials from local sources
- selecting materials that do not release harmful fumes
- selecting materials that are robust, low maintenance, long lasting and fit for purpose

Ecology

Standard 40 (and Policy 7.19) - The design and layout of new residential development should avoid areas of ecological value and seek to enhance the ecological capital of the area in accordance with GLA best practice guidance on biodiversity and nature conservation.

2.3.71 Policy 7.19 Biodiversity and access to nature promotes a proactive approach to the protection, promotion and management of biodiversity across the capital¹⁶⁰. Proposals for development should give full consideration to their direct and indirect effects on ecology. Ecological improvements can be achieved as part of Sustainable Urban Drainage Systems and incorporated into green or brown roofs, green walls and soft landscaping.

¹⁵⁹ Further detail will be provided in a revised Sustainable Design & Construction SPG

¹⁶⁰ Mayor of London. Improving Londoners' Access to Nature. London Plan Implementation Report. GLA, 2008

2.3.72 The Mayor's Sustainable Design and Construction SPG provides further details on legally protected habitats and species and guidance on the design of development in order to avoid and minimise impacts and mitigate and enhance habitats. Natural England provides a list of protected species and sites as well as guidance relating to protected species. To identify any ecological constraints at the initial design stage sufficient time at design stage should be aside for any surveys required and to enable the designs to take account of, and address issues arising from, any protected habitat or species.

2.4 DESIGN PROCESS

Standard 41 - Developments should manage existing materials, specify sustainable materials that are robust and fit for purpose and secure the sustainable procurement of materials.

2.4.1 Achieving good design is not simply about applying a set of design standards. An effective design process is vitally important to achieve a positive design outcome and to meet the ambitions of the Plan.

2.4.2 From the feasibility stage of the design process designers should:

- consult the housing design standards within this SPG to build in appropriate allowance for the full range of standards, and ensure the size and shape of individual dwellings will accommodate the internal design and space standards;
- check local policy for additional requirements, for example local advice on the mix of housing types; and.

2.4.3 A statement of compliance with the standards outlined above should be provided within a design and access statement. Further guidance on preparing design and access statements can be found in the Accessible London SPG¹⁶¹. At planning application stage, developers are encouraged to provide the following minimum information in a design and access statement for the scheme as a whole:

- drawings of the proposal in context with accompanying analysis of local character and how the proposals should relate to / respect this;
- context plan showing travel distances, walk routes and local facilities;
- table(s) giving the scheme profile: summary information on site area, density, local PTAL level, the number of new homes, the number of wheelchair accessible homes;
- table(s) giving the scheme dwelling mix: the number of dwellings of each housing type (bedrooms/occupancy) belonging to each tenure;
- table(s) giving gross internal areas for each dwelling, by housing type and number of storeys;

¹⁶¹ www.london.gov.uk/priorities/planning/publications/accessible-london-achieving-an-inclusive-environment

- street level site plan and block plans at each floor level;
- floor to ceiling heights shown on plans or sections; and
- sustainability statement;
- identify which are M4(2) and which are M4(3) dwellings

2.4.4 For each dwelling or dwelling type:

- dwelling plans not smaller than 1:100 scale with metric room dimensions showing the position of furniture and activity zones, and spaces allocated for a washing machine, for drying clothes, and for storing waste and recycling bins within the home;
 - the intended occupancy; and
 - the GIA.
 - the area of built-in storage free of hot water cylinders and other services; and
 - the area and dimensions of private outdoor space
 - M4(3) dwellings must evidence that bathrooms and kitchens are capable of meeting the 'wheelchair accessible layout' even if they are being built as wheelchair adaptable dwellings as required by Part M.
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PART 3:

HOUSING CHOICE

3.0.1 The Mayor is committed to promoting a real choice of homes for Londoners (Policies 3.8 and 3.9). Central to this is encouraging a range of tenures, including different types of affordable housing and providing for groups with distinct housing requirements. This part of the SPG provides guidance on the overall approach to estimating needs of different sorts; on the role of planning in facilitating private rented housing; and addressing the requirements of distinct groups. As set out in the introduction to this SPG, the Housing and Planning Bill will have implications for the type and level of affordable housing available and delivered in London. Therefore, other than a section dealing with viability (see page 125), the majority of the Affordable Housing Chapter consulted on remains as draft. So too do the sections of this chapter which rely on affordable housing policies to deliver policy goals, such as Policy 3.9 Mixed and Balanced Communities. Further guidance on affordable housing will be provided if necessary when the Housing and Planning Bill receives Royal Assent and the Mayor can better understand the implications on London Housing and Planning policy.

3.1 IDENTIFYING HOUSING NEED

3.1.1 The NPPF places particular weight on assessing housing need, and both the Plan (Policy 3.3B) and the NPPF make clear that the fundamental dynamic to planning for housing must be to meet this need, qualified by the requirement that it be done so as to further the objective for sustainable development.

3.1.2 The 2013 London Strategic Housing Market Assessment (SHMA)¹⁶² provides a key part of the evidence base for the London Plan and London Housing Strategy, as well as the strategic context for sub-regional and local housing market assessments carried out by boroughs. It is important to note that this SHMA, like previous studies, looks at housing requirements at the London wide level only.

3.1.3 The London Plan is clear that boroughs remain responsible for assessing their own requirements, within the policy context set by the NPPF and the London Plan. Given that housing sub-market areas in London frequently extend across local borough boundaries, many boroughs work in partnership to assess housing requirements on a sub-regional basis. Policy 3.8B requires Local Plans to take account of housing requirements at different spatial scales, including regional, sub-regional and local levels. Whatever scale a SHMA is carried out at, it must recognise and take account of the influence of the wider housing market area, which will often extend outside London's boundaries. This allows boroughs to take a pragmatic approach to identifying the spatial scale at which the SHMA should be carried out, and recognises that boroughs are at different stages in their local plan process, while also ensuring that that the complex linkages between areas within and outside of London are taken into account in the SHMA.

3.1.4 To assist boroughs in preparing local/sub regional needs assessments within

¹⁶² Mayor of London. The London Strategic Housing Market Assessment 2013 (SHMA). GLA 2014

the context of the London SHMA, paragraph 3.2.11 provides the key principles for carrying out a local level SHMA. Annex 1 of this SPG provides four indicative borough level housing need benchmarks and borough affordability ratios to demonstrate where extra supply may be needed to respond to market indicators. These figures are indicative headline benchmarks which can provide context to inform local/sub regional SHMAs and for the finer level detail required at borough level on the tenure, size and type of housing required and should be considered in the context of Policy 3.11 of the London Plan. They are not borough level objectively assessed need figures or need targets.

- 3.1.5 When using these figures, it is also important to note that population and household projections, by their nature, reinforce past trends. Therefore, boroughs that have had limited development over the past five years are likely to have low projected growth in the future. In addition, the presence of large numbers of vacant or second homes will have a downward pressure on population projections.
- 3.1.6 Also, boroughs with high house prices can also appear to have a low backlog of need. This may be because higher income groups have been most successful in accessing the housing in these boroughs. It is therefore important that boroughs take account of market signals as well as backlog need requirements when calculating overall need. For these reasons it is preferable, where possible, that SHMAs are carried out on a geographical basis wider than the Local Authority level. Moreover, resultant policies should take account of strategic as well as local need.
- 3.1.7 Boroughs are advised to draw upon the most recent population and household projections developed by the GLA. Government and PINS have accepted these as underpinning the 2015 London Plan¹⁶³ which is part of every London boroughs Development Plan. The GLA's own population projections have proved more accurate than the 2011-based SNPP when measured against the ONS mid-year estimates. Using the GLA's projections will help ensure consistency between Local/Sub Regional SHMAs and the London wide SHMA.
- 3.1.8 The tiered approach to understanding housing requirements, with a strategic London wide study supplemented by more detailed sub regional and local studies, has been an accepted approach in the context of London's two tier planning system. This approach is designed to address the requirements of the NPPF and those of Policy 3.8. It also means boroughs can ensure that sub regional and local studies take account of cross London boundary relationships as required by Policy 2.2 of the London Plan and the Duty to Cooperate and are detailed enough to feed into Housing Strategies (and meet the requirement of Section 8 of the 1985 Housing Act¹⁶⁴) and provide detailed evidence which can be used for determining/ negotiating individual planning applications. This approach is well

¹⁶³ Planning Inspectorate 2014. Report to the Mayor of London by Mr A Thickett.

¹⁶⁴ 1985 Housing Act, Part 11, Section 8, Periodical review of housing needs.

established in London and is intended to address the requirements of national guidance in a pragmatic, cost effective and coordinated way and to ensure that borough DPDs are soundly based on authoritative evidence of housing need in the highly complex London housing market.

3.2 2013 SHMA

3.2.1 The 2013 SHMA uses a ‘net stock’ approach that differs from the methodologies used in previous GLA studies. This approach compares the current housing stock to the future stock required, with the latter calculated from household projections, patterns of affordability and estimates of backlog need. Backlog need is disaggregated into categories that: add to total housing requirements (for example, concealed households); change the tenure mix of requirements (for example, homeless households in private sector leased accommodation); and change the size mix of requirements (for example, overcrowded social renting households). The SHMA assumes that the backlog of housing need identified will be cleared over twenty years. This methodology was found to be robust by the Further Alterations to the London Plan EIP inspector¹⁶⁵.

3.2.2 A series of affordability tests are applied to identify which tenure future households will be able to afford, by comparing their incomes to benchmark price and rent levels. Full details of the methodology can be found in the SHMA report¹⁶⁶.

3.2.3 The results of the main SHMA scenario are set out below. This shows the net annualised housing requirement 2015/16 -2034/35 across London by tenure and size. The table sets the context for Local Plan preparation. The figures show London-wide requirements for housing, in proportional terms their composition will vary between local areas. These variations will be identified through sub-regional and local SHMA and be addressed in local plans.

TABLE 1: NET ANNUALISED HOUSING REQUIREMENT 2015/16 TO 2034/35

TENURE	1B	2B	3B	4+B	TOTAL	% OF TOTAL
Market	2,798	5,791	8,545	6,083	23,217	48%
Intermediate	3,357	2,240	2,506	1,799	9,902	20%
Social/affordable rent	10,225	1,003	1,774	2,720	15,722	32%
Total	16,381	9,034	12,825	10,602	48,841	100%

3.2.4 The results of the SHMA are sensitive to the assumptions used. The timescale is particularly important: if we look only at the period 2015/16 to 2024/25 and assume the backlog is cleared over ten years, then the annualised housing requirement increases to 62,088 homes a year.

¹⁶⁵ Planning Inspectorate 2014. Report to the Mayor of London by Mr A Thickett

¹⁶⁶ Mayor of London. The London Strategic Housing Market Assessment 2013 (SHMA). GLA 2014

- 3.2.5 It is also important to note that the SHMA model assumes that both overcrowding and under-occupation are eliminated in affordable housing over the twenty year period but that under-occupation continues in market housing (because many households can afford larger homes than they need). This helps explain why the SHMA's identified requirement for family homes is relatively high in the market sector and relatively low in the affordable sector.
- 3.2.6 LPAs will need to consider if this assumption is appropriate for local and sub-regional SHMAs. In particular, LPAs are advised to consider the household representative rates that underpin the GLA's household projections and the potential implications for household size (see Table 2). As discussed in the 2013 SHMA, the projected 2036 population has a much older average age than currently; this has a very large effect on projected household growth because older people are more likely to head a household. Table 2 below shows projected annualised household growth by type of and number of children which boroughs may want to consider as part of their SHMA analysis.
- 3.2.7 Boroughs will need to take a view, as part of their sub regional and local SHMAs, as to what extent the projected increase in smaller households will translate into a requirement for one and two bed homes in the market sector.

TABLE 2: PROJECTED ANNUALISED HOUSEHOLD GROWTH 2011-35 BY TYPE AND NUMBER OF CHILDREN.

HOUSEHOLD TYPE	NO CHILDREN	ONE CHILD	TWO CHILDREN	THREE OR MORE CHILDREN	TOTAL
One person: Male	4,551	0	0	0	4,551
One person: Female	1,706	0	0	0	1,706
Couple families	4,807	1,683	788	1,143	8,421
Couple & 1 or more other adults	7,506	1,465	825	779	10,575
Lone parent families	0	2,850	884	516	4,249
Lone parent & 1 or more other adults	0	784	463	202	1,448
Other households	8,901	0	0	0	8,901
Total	27,471	6,781	2,960	2,640	39,852

- 3.2.8 Similarly, for the affordable housing sector, while allocation policies and welfare reform will, to some extent, ensure tenants are only occupying the number of bedrooms they need (according to the bedroom standard), some under occupation in the affordable sector is likely to remain. Therefore, the requirement for larger affordable homes may be higher than the net stock model suggests. Again it will be for LPAs to assess this in their sub regional/local SHMAs taking account of local circumstances.
- 3.2.9 The Mayor's housing covenant 2015-2018 programme supports a short term

focus on delivering smaller properties at capped rent¹⁶⁷ to provide downsizing opportunities for those impacted by welfare reforms which encourage a better use of stock.

3.2.10 It is also important to consider the specific needs of the households in a borough or area when considering the size mix of new properties. For example, supplying market and intermediate specialist older person accommodation may free up market family units and thus reduce the requirement for additional family housing. In addition, LPAs should consider how patterns of occupation may change in the future given current trends. For example, current levels of under occupation in the market sector may not remain given the projected increase in private renting, as rented properties are more likely to be fully occupied.

3.2.11 To aid boroughs in carrying out SHMAs and to encourage consistency across London boroughs should follow the principles below:

- **Consider housing market area geographies that extend beyond single borough boundaries**, to reflect the realities of London's housing market. Housing market areas can be conceived as tiered, so that a sub-regional housing market area is often the appropriate scale for analysing borough-level housing needs. Housing market areas can also overlap regional boundaries, as boroughs in outer London often have strong market links with those in other regions.
- **Consider different demographic scenarios, ideally using GLA household projections for consistency.** No demographic projection will be 100% accurate, so SHMAs should model the impact of different demographic scenarios. The GLA's population and household projections are designed to relate to London's particular characteristics to a greater extent than national ONS and DCLG projections. The GLA projections include a range of scenarios. To assist housing market partnerships that cross London boundaries the GLA has shared data on its demographic assumptions with areas outside London to encourage them to take account of the GLA scenarios, particularly the assumptions related to out migration.
- **Make allowance for backlog need and other factors that increase the number of homes required.** As discussed in the London SHMA, assessments of housing need should take into account the backlog of housing need, distinguishing between categories of need that add to the total number of homes required (for example, from concealed households or those in non-self-contained temporary accommodation) and categories that change the mix but not the total amount of need (for example overcrowding). They should also take into account any forecast under-supply of housing between the base year used and the start of the plan period (e.g. between 2011 and 2015 as in the London SHMA). In addition, it should ensure that the number of new homes required includes an allowance for vacant and second homes as in the London SHMA.

¹⁶⁷ Capped rent refers to affordable rent properties with a rent that is capped at 50% of market rent

- **Take account of market signals.** The NPPG requires estimates of need to be increased if market signals indicate a significant affordability problem. There is as yet no standard way to do this, but it is a significant issue for many parts of London. Annex one details the affordability ratios for each borough. Where boroughs' affordability ratios are significantly higher than their surrounding boroughs and/or the London average, the SHMA should demonstrate how this has been captured in an increase in their overall need. LPAs should also take account of the relative change in affordability over time.
- **Consider how the economy and jobs growth will influence housing need.** Need assessments should also consider how housing provision can help accommodate London's growing workforce, as set out in the GLA's employment projections for London. In doing so, it is important that boroughs take account of employment trends beyond their own boundaries, as London's labour market encompasses the wider region and beyond.
- **Take into account wider needs.** Although not a requirement of the SHMA itself, when assessing housing capacity and setting targets, London Plan policy is clear that all boroughs should contribute towards meeting not just their own need, but needs arising in London as a whole. All SHMAs should be carried out in the context of London's overall strategic requirement of at least 49,000 homes and Local Plans must seek to contribute to meeting that need as far as possible in line with the other policies of the plan (See Part one).
- **Specific needs.** As well as overall need, SHMAs should assess the needs of specific groups – more detail is provided on this below.

3.2.12 The SHMA provides a strategic over-view of the diversity and complexity of London's housing requirements. The SHMA does not itself constitute policy or provide the answers to policy issues. Account also has to be taken of other factors, such as the viability of housing provision¹⁶⁸ and the availability of funding for affordable housing. The London Plan and the London Housing Strategy both seek to meet the requirements identified in the SHMA subject to the constraints imposed by viability and by other policy objectives.

Specific needs

3.2.13 In line with Government guidance¹⁶⁹ and reflecting the findings of the SHMA, the London Plan identifies specific groups which have distinct strategic housing needs. The list is not exhaustive and there will be localised groups, identified at the borough and sub-regional level, which should also be planned for. LPAs should, engage with these groups to get a proper understanding of their housing needs.

¹⁶⁸ DCLG NPPF 2012 *ibid* para 173

¹⁶⁹ NPPF and NPPG

3.3 BUILD TO RENT

- 3.3.1 The private rented sector (PRS) is the only housing sector to have seen relative growth in recent years. It now houses 30% of all households in London, up from 14% in 2003/04¹⁷⁰. The sector is becoming increasingly important in supporting labour market mobility, accommodating over half of the one in eight households who move in London each year.
- 3.3.2 Government¹⁷¹ and the Mayor support provision of more private rented homes (Policy 3.8B a1) and the 2015 London Plan recognises that the planning system should take a more positive approach in enabling this sector to contribute to the achievement of housing targets. Positive support should be given for long term private rented products through the land use planning system at local as well as strategic level, eg recognising in Local Plans how the private rented sector can meet a range of needs and be particularly suitable for certain locations; as well as through development management.
- 3.3.3 Long term, purpose built, private rented (build to rent) developments in block ownership and managed as a single development could make a particular contribution to meeting housing need. Such schemes are beneficial in a number of ways; they have the potential to accelerate delivery and not compete with nearby for sale developments; they can offer longer term tenancies/more certainty over long term availability; they can ensure high quality management through single ownership; and they can ensure a commitment to, and investment in, place making. They can also meet a wide range of needs, including those of singles, sharers, families and older people. Such schemes are strongly encouraged to sign up to the London Rental Standard.
- 3.3.4 As part of encouraging the development of this type of housing the Mayor has made clear that LPAs should recognise the distinct economics of the sector relative to mainstream market housing and take account of this when undertaking viability assessments for covenanted build to rent schemes. These distinct economics is normally taken to mean two separate but connected things. Firstly, a reliance on an annual revenue income through rent rather than upfront capital receipts; and secondly, even taking this into account, that build to rent cannot compete on an equal footing with speculative build for sale, as it has inherently lower returns. However, in many cases affordable housing will be viable and the policy continues to encourage onsite affordable housing as far as possible. These distinct economics should also be taken into account when disposing of public land.
- 3.3.5 Covenanted schemes are schemes that are secured as private rent for a fixed period either through a covenant, a Section 106 agreement or other legal

¹⁷⁰ CLG English Housing Survey headline report 2013/14.

¹⁷¹ HM Government. Laying the Foundations: A Housing Strategy for England (Housing Strategy). Chapter 4. CLG, 2011 and NPPF How should the needs of all types of housing be assessed (accessed 22.01.2015).

agreement typically for 15 years or more and are retained in single ownership (overall ownership may change over this period - see paragraph 3.3.9). The appropriate covenant length will differ on a case by case basis and it is envisaged that the typical length of covenant will increase as investor confidence in the product grows.

- 3.3.6 If a build to rent scheme delivers the same level of affordable housing as a market sale scheme, generally there would be no requirement for a covenant. However, covenants are necessary where the distinct economics of build to rent lead to reduced viability in terms of meeting affordable housing and other section 106 and policy requirements relevant to the development.
- 3.3.7 As part of the viability testing process to provide an understanding of the distinct economics an applicant should submit a 'for sale' viability appraisal alongside the appraisal for the covenanted build to rent scheme. Where viability testing of covenanted schemes demonstrates that affordable housing contributions at the level supported by private sale are unviable because of the distinct economics of build to rent, 'clawback' mechanisms should be included as part of the planning permission to recoup this loss of affordable housing if the market homes are sold out of the long term PRS market and to ensure schemes deliver the maximum reasonable level of affordable housing in line with Policy 3.12. The clawback period should run with the covenant but should not be less than 15 years. Therefore, if the covenant period is shorter than 15 years, the clawback period will run beyond the covenant.
- 3.3.8 The clawback agreement could base the clawback amount on the level of affordable housing that would have been viable on the scheme if it was for traditional market sale (less any on-site affordable homes delivered as part of the scheme); where appropriate this approach could also include a review mechanism (see part four). Alternatively it could be based on an agreed proportion of the sale price of each property when it is sold. The clawback could be in the form of additional onsite affordable homes or be in the form of a commuted sum. To encourage long term institutional investment, this clawback requirement could proportionately reduce over time and be waived for schemes that are kept in the PRS market for the longer term.
- 3.3.9 Section 106 agreements and covenants should be carefully worded in order for the construction of the units to be VAT zero-rated. In addition to meeting the other VAT conditions, it is also necessary that the separate use or disposal of a unit is not prohibited by any covenant, statutory planning consent or similar provision. This means, within the granting of any planning consent, it must be clear that buildings or individual units can be sold out of the long term PRS market which may result in any affordable housing contribution being 'clawed' back. The Section 106 should also clearly set out the how the clawback will operate (see paragraph above), including how it will be calculated. Additionally, overall ownership of the building(s) in which the units are located may be allowed to
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change over the covenanted period without triggering 'clawback' if they remain as single ownership PRS.

- 3.3.10 Where viability suggests that traditional affordable housing products are unviable on covenanted schemes due to the distinct economics of such schemes, developers and LPAs could consider including only discounted market rent (intermediate rent) as the affordable offer. To be counted as affordable housing, the discounted market rent units must meet the NPPF definition of intermediate housing, and be affordable to those eligible for intermediate housing in London. It should also be noted that being a Local Authority or a private registered provider is not a requirement to deliver or manage intermediate dwellings and thus the units can be owned and/or managed by private sector landlords. In addition, some discounted market rented products not let by a private local authority/registered provider also qualify for mandatory CIL relief¹⁷². Discounted market rent units can also easily be 'tenure blind' and pepper potted through the development. Where discounted market rent units are being supplied and are owned and or managed by a non registered provider LPAs are encouraged to ensure that they are accredited by the London Rental Standard.
- 3.3.11 Build to rent can be particularly suited to higher density development within or on the edge of town centres or transport nodes. Local policies requiring a range of unit sizes could be applied flexibly to build to rent schemes in these locations to reflect demand and the distinct viability challenges faced by build to rent. Potential yields and investment risk can be affected by increases in the number of large units within a scheme. Policy 3.5D and the standards in Part two of this SPG provide flexibility to consider innovative designs where they meet identified need and are of an exceptional design and standard. Moreover, it should be noted that the nationally described space standard is not prescriptive in regard to the layout of dwellings.
- 3.3.12 In line with the NPPG, borough SHMAs should identify the future need for private rented sector housing; this can be informed by current tenure patterns, analysis of market signals and data sources such as the English Household Survey.
- 3.3.13 Further support for build to rent can be given through broad-based spatial planning policies, whether these be in LDFs or through more specific, local housing and other related strategies. Such support could include:
- encouraging long term institutional investment, with boroughs working with the GLA and delivery partners
 - supporting institutional investment on public land, including that owned by the GLA. In particular, boroughs may wish to explore the use of joint ventures or deferred receipts as a way to take account of the distinct economics of, and to

¹⁷² The Community Infrastructure Levy (Amendment) Regulation 2015 – amendment to Part 6 – exemptions and reliefs.

encourage institutional investment in, the private rented sector¹⁷³

- innovative approaches to capturing planning gain through use of covenants or other mechanisms to ensure the delivery of affordable housing within build to rent developments
- maximising the potential of reforms to Real Estate Investment Trusts to attract investment

3.3.14 In addition to the measures in the London Plan, the Mayor has set out policies in his London Housing Strategy¹⁷⁴ to promote institutional investment in PRS and to improve the quality and the management of the PRS. The Strategy seeks to ensure that developers and registered providers deliver at least 5,000 purpose-built long term private rented homes a year, and implements the London Rental Standard to improve management standards, with a target to accredit 100,000 landlords and agents by 2016.

3.4 HOUSES IN MULTIPLE OCCUPATION (HMOS)

3.4.1 There are 21,000 mandatory licensable HMOs in London and an estimated 195,000 in total¹⁷⁵. Collectively, they are a strategically important housing resource, providing flexible and relatively affordable accommodation through the private market. Outside London they are sometimes associated with concentrations of particular types of occupier e.g. students, leading to concerns about the social mix of some localities. In London, the occupier profile tends to be more broadly based and HMOs play a particularly important role in supporting labour market flexibility (especially for new entrants), and in reducing pressure on publicly provided affordable housing. However, as elsewhere in the country, their quality can give rise to concern.

3.4.2 The LP (paragraph 3.55) is clear that “where they are of reasonable standard they should generally be protected and the net effects of any loss should be reflected in Annual Monitoring Reports. In considering proposals which might constrain this provision, including Article 4 Directions¹⁷⁶ affecting changes between Use Classes C3 and C4, boroughs should take into account the strategic as well as the local importance of houses in multiple occupation”. This may require striking a careful balance between local concerns, such as those to protect large houses for local family occupation, and the contribution they can make to meeting strategic and local needs if converted to HMOs.

¹⁷³ DCLG. Review of the barriers to institutional investment in private rented homes. DCLG, 2012

¹⁷⁴ Mayor of London Revised London Housing Strategy 2011 *ibid*

¹⁷⁵ Communities and Local Government. Housing Strategy Statistical Appendix. Data returns for 2013/14. CLG, 2014

¹⁷⁶ See Article 4(1) of the Town and Country Planning (General Permitted Development) Order 1995, as amended

3.4.3 As noted in para 1.2.15, the Mayor is working with a range of stakeholders to support boroughs in taking local action and enforcing against illegal conversions/developments including 'beds in sheds'.

3.5 NEW HOUSING PRODUCTS

3.5.1 As housing need increases in London, new approaches to meeting need are emerging. Where these products are of a high quality and well-designed, they can play an important role in meeting housing need and should be encouraged. It is important Local Plans provide a robust framework for decision making for these new emerging housing types. In considering policy approaches to, and proposals for, non-conventional housing schemes (this includes, but is not limited to, shared hostel type accommodation, often referred to as large scale HMO's¹⁷⁷), LPAs should ensure:

- proposals demonstrate how they meet identified housing needs (Policy 3.8Ba);
- proposals demonstrate how they contribute to the creation of mixed and balanced communities (Policy 3.9);
- schemes contribute the maximum reasonable amount of affordable housing in line with Policy 3.12 and Policy 3.13. Neither the NPPF nor the London Plan limits the requirement of affordable housing contributions to C3 housing. Therefore affordable housing can also be sought on residential schemes that fall into other use classes (including sui-generis);
- schemes are of good quality and meet all relevant Housing Act and HMO standards and requirements.
- there are effective management arrangements and support services in place to reflect the needs of the schemes' intended occupiers, ensure such schemes do not have a negative impact on the surrounding community and that adequate lettings policies are in place to manage the mix of occupants;
- the development is not used as a student accommodation, as a hotel, or as temporary homeless accommodation without first securing an appropriate planning permission; and
- such schemes are located only in areas of high public transport accessibility.

3.6 PRIORITY FOR AFFORDABLE FAMILY ACCOMMODATION

3.6.1 There is a particular challenge in meeting the housing requirements of families in need of affordable accommodation, both social/affordable rented and intermediate (Policy 3.8B.b). This is underscored by the number of overcrowded

¹⁷⁷ These forms of developments are evolving but are non-self-contained and generally include a private bedroom with shared kitchen and living/amenity facilities. Developments that include self-contained accommodation and additional communal/amenity space should be considered as self-contained accommodation and thus adhere to the housing standards set out in Policy 3.5.

households in London – almost 8% of total households compared with little more than 2% in the country as a whole. The Mayor has a long-term commitment to meeting the need for family sized homes identified in the SHMA. His overall approach is set out in the London Housing Strategy¹⁷⁸

- 3.6.2 Local requirements are likely to vary from the requirements identified at the London wide strategic level. The desired mix of provision for specific sites should be informed by evidence from sub regional/local housing market assessments and by the priorities set out in the local plan. However, it must be emphasised that local housing requirements should not be the single determinant of housing mix sought on individual developments. LP Policies 3.8, 3.11 and 3.12 expect boroughs to have regard to housing needs beyond their own boundaries when setting their affordable housing policies.

3.7 OLDER LONDONERS

- 3.7.1 While London is a ‘young’ city, it is expected to experience substantial growth in the population of older people¹⁷⁹ – this has already begun to emerge as an issue in some boroughs, especially in Outer London¹⁸⁰. According to the GLA’s central population projection the number of people aged 65 and above in London is projected to grow rapidly from 910,000 in 2011 to 1.49 million by 2036 and the over 90s are expected to increase by 200 per cent to 131,000¹⁸¹. Not only are the numbers of older people growing, but the average number of years people survive with a disability or long term illness is increasing.
- 3.7.2 These trends are part of what is likely to be a long term, structural change in London society and have implications for the type of accommodation London needs to deliver and how the best use of stock can be ensured. Subject to viability assessments and other tests (see para 3.1.35), the London Plan (Policy 3.8B e) provides the basis for the planning system to contribute to wider initiatives addressing this change¹⁸², recognising it is likely to become of greater importance over time and a continuing concern for future Plan reviews.
- 3.7.3 A recent report commissioned by the GLA “Older Londoners and the London Plan. Looking to 2050” contains a detailed analysis of local plan policies specifically related to older persons across all London and includes a series of case studies showing how, through relatively small changes to the planning system, life could be better for older Londoners than it is today¹⁸³.

¹⁷⁸ Mayor of London. Homes for London: The London Housing Strategy 2014

¹⁷⁹ Mayor of London. London Plan 2015. Para 3.50

¹⁸⁰ Outer London Commission. Final Report. GLA, 2010

¹⁸¹ Mayor of London. London Plan 2015.

¹⁸² Mayor of London. London Housing Strategy 2014 op cit

¹⁸³ Three Dragons et al. Older Londoners and the London Plan .Looking to 2050. A report for the Greater London Authority. 2016

Specialist housing

3.7.4 A variety of housing options are required to ensure older people's needs and aspirations are addressed, some of which will include support to enable older people to live independent lives. Research shows¹⁸⁴ that the choices (see typology below) open to older Londoners may be constrained due to inadequate supply. This may have wider implications for the housing market, in particular for the supply of family homes.

Older person's housing (Use Class C3) where planning policies to increase supply may be required:

- Downsizer accommodation
- Senior co-housing

Specialist housing where planning policies to increase supply are likely to be required

- Sheltered accommodation (also called retirement housing) (use class C3) ; self-contained residential accommodation specifically designed and managed for older people (minimum age 55) in need of no or a low level of support. Each household has self-contained accommodation and the schemes normally include additional communal facilities such as a residents lounge. A warden, scheme manager, community alarm/telecare or house manager interacts with residents on a regular basis and is the first point of contact in an emergency .
- Extra care accommodation (also called close care, assisted living, very sheltered or continuing care housing) (use class generally C3- see use class section below); Self -contained residential accommodation and associated facilities designed and managed to meet the needs and aspirations of people who by reason of age or vulnerability have an existing or foreseeable physical, sensory or mental health impairment. Each household has self-contained accommodation and 24 hour access to emergency support. In addition extra care accommodation includes a range of other facilities such as a residents lounge, a guest room, laundry room, day centre activities, a restaurant or some kind of meal provision, fitness facilities and classes and a base for health care workers. The exact mix of facilities will vary on a site by site basis. Some domiciliary care is provided as part of the accommodation package, according to the level of need of each resident. Extra care housing aims to create a balanced community, bringing together a balanced proportion of people with different levels of care needs.

Use class C2 – Residential institutions

¹⁸⁴ Cambridge Centre for Housing and Planning Research, Three Dragons, Land Use Consultants and Heriot Watt University. The role of the planning system in delivering housing choice for older Londoners. December 2012

- Residential / nursing care (including end of life/ hospice care and dementia care); Nursing or residential care home providing non-self-contained residential accommodation for people who by reason of age or illness have physical, sensory or mental impairment, including high levels of dementia. Accommodation is not self-contained; meals and personal services are routinely provided to all residents. Communal facilities are likely to include a dining room and residents lounge. There will be a scheme manager and in house care team who provide a consistent presence. Personal or nursing care is a critical part of the accommodation package . Nursing homes include 24 hour medical care from a qualified nurse .

Housing options using existing general needs housing for which no planning policy is required

- Staying put
- Staying put by sharing
- Staying put by taking in lodgers
- Staying put by Homeshare
- Let to Rent / Freespace

Typology

3.7.5 The range and mix of housing requirements for older people will vary significantly between boroughs and depend on a range of factors. It is for LDFs to determine how the broad policies of the London Plan can be implemented most effectively in light of local circumstances. However, in line with Policy 3.8Be, boroughs should ensure that their LDFs plan for the identified needs of older people.

General approach

3.7.6 For the majority of older people, remaining in their own home is their preferred choice¹⁸⁵. The London-wide implementation of Building Regulation requirement M4(2) to 90 per cent of on all new housing development and requirement M4(3) to the remaining 10 per cent of homes (see Part 2 of this SPG) will mean that London's housing stock will increasingly be able to accommodate these needs as a matter of course.

3.7.7 The needs of active older Londoners must be a particular consideration for LDFs in implementing the concept of 'Lifetime Neighbourhoods' in line with LP Policy 7.1. This recognises that good physical access to shopping and other services can enhance social relationships across the community at large and, in particular, redress isolation among older people. The Outer London Commission¹⁸⁶

¹⁸⁵ Lifetime Homes, Lifetime Neighbourhoods A National Strategy for Housing in an Ageing Society CLG DoH DWP 2008

¹⁸⁶ Outer London Commission. Second Report to the Mayor. GLA, 2012

suggests, and independent consultants confirm¹⁸⁷, that this makes town centre or edge of centre locations particularly appropriate for new, purpose built accommodation, especially for the active elderly. The Plan's private outdoor space standards will help address concerns that higher density development in such places might make them unsuitable for this group.

Specialised housing and registered care accommodation for older people

3.7.8 In circumstances where older people choose to seek alternative, more tailored accommodation, LDFs can support housing management measures to reconcile specific as well as general needs with existing provision. This can also help to address under-occupation, freeing up capacity for families. Boroughs should consider the aspirations of older people in order to understand the types of offer to encourage older people to move when they are able. The Mayor's Seaside and Country Homes initiative can help older people that want to move out of London find suitable accommodation and also help free up existing family housing in the capital. So too can local public/private partnerships when re-developing existing housing e.g. the Dickens Yard scheme in Ealing which is designed to enable and incentivise older people to move into smaller, more appropriate accommodation while staying in the locality.

3.7.9 LPAs should plan positively for specialist provision for older people, including through local plan allocations and ensure there is alignment between planning and investment policies. Individual proposals should be considered in light of LDF policies which are required by the NPPF and London Plan to address local, identified needs for specialist provision¹⁸⁸.

3.7.10 An independent review¹⁸⁹ of the way in which the planning system can help meet the housing needs of older people highlights the need for many boroughs to take a pro-active approach to increase provision of C3 'sheltered' and 'extra care' accommodation, especially in the private sector. The consultants found that, at present, across London as a whole, most specialist housing for older Londoners is in the social rented sector. Given that more than 60% of older people in London are home owners, LPAs should seek to encourage provision of a range of housing options which reflects the diversity of tenure amongst older households.

3.7.11 The 2014 update to the review¹⁹⁰ suggests the potential demand for specialist older person housing which cannot be met from the existing stock is approximately 3,900 new specialist units a year, broadly broken down into 2,620 private units, 955 for intermediate sale (shared ownership, shared equity or

¹⁸⁷ Cambridge et al 2012 ibid

¹⁸⁸ CLG NPPF 2012 ibid para 50, LP Policy 3.8B e.

¹⁸⁹ Cambridge et al 2012 ibid para 7.4 Cambridge Centre for Housing & Planning Research, Three Dragons, Land Use Consultants. The role of the planning system in delivering housing choice for older Londoners. Report for the GLA, GLA, 2012. Update GLA 2013

¹⁹⁰ ibid

leasehold for the elderly type schemes) and up to 325 new affordable rental units (although additional rental units may be required to replace stock that is unfit for use by older people). Depending on whether existing levels of provision are maintained and on the levels of need among older Londoners, there may also be a requirement for some 500 new bedspaces per annum in care homes.

3.7.12 Annex 5 of the 2015 London Plan breaks these requirements down into indicative borough benchmarks¹⁹¹. These show that some boroughs have a surplus of affordable specialist housing (some of it in need of modernisation), but all have a shortfall of private provision, and some demand for intermediate sale products. The type of intermediate products that are suitable for older people are likely to be different to mainstream intermediate products. For example, for older people that own their current properties outright, shared ownership, which requires rent to be paid on part of the property, is unlikely to be as attractive as shared equity or leasehold for the elderly products where no rent is paid. The intermediate market, particularly for specialist accommodation for older people, is very much an emerging market; boroughs are encouraged to work with providers and developers to devise products that better meet the needs of London's emerging older population.

3.7.13 For some LPAs the benchmarks suggest a significant amount of their minimum housing supply target (as set out in table 3.1 of the London Plan) should be delivered as older person accommodation. However, this is likely to be a reflection of the extent that overall need outstrips currently identified capacity, rather than a suggestion that the majority of additional housing should be specialist older persons accommodation. Local/ sub regional needs assessments will be able to analyse this in more detail. These requirements should be taken into account when LPAs seek to reconcile need and demand as detailed in the Supply section of the SPG.

3.7.14 LPAs should work with developers and providers to bring forward suitable sites to deliver specialist older persons accommodation that meets the needs and aspirations of older Londoners. This could include identifying sites particularly suited to delivering older persons housing as part of the site allocations process and introducing policies that require specialist older persons housing as part of certain types of development to meet an identified need. Town centres and other areas with good accessibility to public transport and facilities are likely to be suitable for specialist older person accommodation and may offer an attractive option to downsizers, particularly if it enables them to stay in their local area. Consultants confirm that most specialist need tends to be expressed locally and, to maintain supportive social networks, should be addressed similarly, though allowance should also be made for operation of the wider London housing market. More general housing needs can also be addressed by 'freeing up' some

¹⁹¹ The benchmarks were developed by Three Dragons consultants using a forecasting model developed for the Retirement Housing Group and by using information from the London Development Database.

conventional housing through additional specialist provision for older Londoners who choose it. In appropriate locations, the conversion or redevelopment of existing conventional homes to specialist housing for older people should be considered positively in light of the overall strategic need for this type of provision and the modest recent rate of net supply.

- 3.7.15 The closure of existing specialist stock can occur for a range of reasons; failure to meet modern quality requirements, size- with high staff costs, economies of scale are increasingly important for efficient operation (it is reported that a typical, modern care home must now provide more than 60 places to be viable); and/or susceptibility for change to higher value uses, especially mainstream housing. However, as set out in the London Plan (Policy 3. 8), where shortfalls of specialist housing needs have been identified, the possibility of other providers of specialist or supported needs accommodation using these existing sites and premises should be explored. Moreover, it should be noted that the benchmark need figures assume the existing provision is retained; any loss of existing provision will necessitate a greater number of new units to meet need.
- 3.7.16 Providing specialist housing for older people is not simply a planning issue. Planning for older peoples housing and support needs requires effective joint working between health and housing agencies as well as planning. Through his role as Chair of the London Heath Board the Mayor will promote recognition of the importance of decent housing for older Londoners as a strategic health issue¹⁹².

Use class

- 3.7.17 There has been some debate over how to categorise specialist older persons accommodation in terms of the Use Class Order. While some specialised housing is clearly institutional in character and has a well defined element of 'care' (typically registered with the Care Quality Commission, previously the Commission for Social Care Inspection¹⁹³) and can be readily categorised as falling within Use Class C2, other forms appear to be on the cusp between this and conventional C3 housing, particularly as some developments incorporate elements of both.
- 3.7.18 Consultants suggest that the most robust way of distinguishing between the two is the 'front door' test – if the unit of accommodation has its own front door then it is usually C3, if not it is C2. However, development management experience suggest in many cases this may require some refinement to take appropriate account of the components of care and support and level of communal facilities such as those associated with some Extra Care schemes where units may have their own front door but functionally are effectively C2. Providing the proposal

¹⁹² London Assembly. Homes for Londoners. Building healthy homes for a comfortable and independent retirement. GLA, 2013

¹⁹³ RTPI, Department of Health, Care Services Improvement Partnership. Extra Care Housing: development planning, control and management. RTPI Good Practice Note 8. RTPI, 2007

is justified by identified need and addresses wider policy considerations, the planning system should not be used to restrict development of either – this is an evolving market and provision should not be constrained by what, in need terms, might appear to be an arbitrary and perhaps dated planning distinction.

3.7.19 However, neither should development proposals be categorised incorrectly (perhaps to avoid S 106 contributions which are normally expected of C3 development). This is an area in which boroughs should carefully consider local needs and viability concerns in taking decisions about the use of planning obligations.

Section 106 and viability

3.7.20 Consultant's report that because of the ancillary services and layout required for new specialist¹⁹⁴ older people's housing, development costs are usually significantly higher than for general needs housing, even when associated direct or indirect revenue streams are netted off. It is therefore important that viability assessments to identify developer contributions are sufficiently sensitive to take these additional net costs into account. This may require 'bespoke' viability assessments and, if necessary their independent validation. LPAs are encouraged to take these costs into account when developing their local CIL charging schedules and to set a lower CIL rate for specialist older persons accommodation than for general needs housing where viability evidence supports this approach. As with housing generally, the Mayor seeks to encourage rather than restrain development of specialist housing and, in line with NPPF requirements¹⁹⁵, this requires a thorough appreciation of viability.

3.7.21 Subject to authoritative evaluation of these additional development costs, the Plan recognises that, in appropriate situations e.g. where development capacity is limited and the proposal would not otherwise meet the spectrum of need identified for older persons housing through the LDF for an area, an LPA may wish to address the negative impact of a specialist development (whether C2 or C3) and, with the developer, seek to make it acceptable through a S106 agreement. The Plan provides a transparent, consistent mechanism to enable boroughs to do this by providing pan London criteria to test whether such contributions should be sought. Boroughs should therefore take account of:

- site circumstances;
- development viability;
- needs assessments;
- availability of development capacity;
- relevant public subsidy;

¹⁹⁴ Specialist accommodation in this context includes sheltered accommodation/retirement housing and extra care.

¹⁹⁵ DCLG NPPF 2012 *ibid* 173 - 174

- the need to encourage rather than restrain development; and
- promotion of mixed and balanced communities.

3.7.22 In some circumstances, where need for specialist older persons accommodation justifies it, boroughs may also want to apply this approach to proposals for general needs housing developments.

3.7.23 With requirements to take account of the circumstances of individual sites, as well as viability and the need to encourage rather than restrain development, this approach addresses developer concerns that such obligations may limit development. In reality, this approach should help make acceptable, development which might otherwise not be so in planning terms, supporting the thrust of Policy 3.8Be to increase provision in light of need. To provide flexibility, the Plan also enables contributions to be made 'off site' in exceptional circumstances, and through 'contingent obligations' or other phasing measures as appropriate. This will address circumstances both where provision is made on site in the form of units of accommodation (as in affordable housing policy), or for a financial contribution to be taken in lieu of this where that is not appropriate. These contributions should be used to secure use of specialist dwellings elsewhere to meet identified need or to provide specialist services e.g. bedspaces in a care home.

3.7.24 In coming to a view as to whether a proposal for specialist provision is acceptable in terms of the paragraphs above, boroughs should bear in mind that consultants¹⁹⁶ have identified a particular emerging need for intermediate specialist housing to meet the requirements of those who do not have adequate private resources but do not receive full public welfare support. They have suggested a range of models which may address this need. S106 may be appropriate to secure contributions towards these.

3.7.25 The independent HAPPI Panel report¹⁹⁷ provides useful examples of a range of sheltered and extra care housing schemes in the UK and abroad, highlighting key design recommendations that improve quality of life and contribute to well being for older people, and identifying planning policy approaches that encourage greater housing choice.

3.7.26 LPAs may wish to consider effective ways of monitoring the provision of C2 accommodation for the older population, perhaps using Annual Monitoring Reports to show:

- net gains, as well as losses;
- approvals and completions of specialist C2 and C3 accommodation broken down by types, tenure and locations; and
- where appropriate, the details of any S106 agreements including affordable housing contributions

¹⁹⁶ Cambridge et al 2012 *ibid* Appendix 7

¹⁹⁷ Housing our Ageing Population Panel for Innovation (HAPPI Panel). *Housing Our Ageing Population Report*. HCA, CLG, DoH, 2009

3.8 OTHER SPECIALIST NEEDS

Communities with larger families

- 3.8.1 Policy 3.8B f seeks to ensure that “account is taken of the needs of particular communities with large families” within the context of wider policy to promote “communities mixed and balanced by tenure and household income across London. Policy to secure larger family homes must also be set in the context of the need to ensure London develops as a city with diverse, strong and secure neighbourhoods and one which promotes equal life chances for all Londoners, including the needs for particular groups and communities.
- 3.8.2 These needs will vary depending on the specific groups and neighbourhoods. In the case of addressing the housing needs of clustered communities which tend to have large families, key issues may include:
- identifying the nature of the community’s needs eg size of accommodation, residential environment, social infrastructure;
 - social constraints on tackling needs eg on balance, will community exclusion/cohesion objectives be best addressed by provision outside or within their existing neighbourhoods taking account of wider objectives for the borough community at large;
 - the geographical extent and character of the community’s neighbourhood relative to its surroundings;
 - physical constraints on tackling the need for larger homes within existing neighbourhoods eg capacity for new provision and/or scope for vertical or horizontal expansion of existing dwellings, or scope/desire for comprehensive re-development; and
 - environmental issues within the neighbourhood and in relation to that of the wider area eg the existing quality of the neighbourhood including relative to the wider area; the impact of horizontal/vertical extensions on these; and ways in which design can address them.

Supported housing

- 3.8.3 In preparing LDFs and considering planning applications boroughs should ensure that specialist housing needs are identified authoritatively and coordinated action is taken to address them in LDF and other relevant plans and strategies (Policy 3.8B g). The Plan notes the importance of doing this to both meet the needs of an ageing population and to address those of other groups which need accommodation based, supported care services such as hostels, refuges and foyers.
- 3.8.4 London boroughs, acting as commissioning bodies in partnership with local health, voluntary sector and other agencies provide housing support services for around 130,000 Londoners. The local planning process is best placed to respond
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to needs identified by these partnerships, ensuring adequate capacity for future growth and that any proposed loss of facilities takes into account both existing and future needs, including those with a strategic dimension. In line with Policies 3.16 and 3.17 the Mayor will expect to see replacement services operational before the facilities they replace are closed, unless there is adequate justification for the change.

- 3.8.5 Boroughs are recommended not to put restrictions on the provision of occupier related accommodation and hostels, such as restricting their numbers in specific locations, unless there is clear evidence of significant negative impact on both the neighbourhood and residents. Boroughs are advised to ensure that sub-standard accommodation is brought up to standard and if this is not possible, that it is replaced at a satisfactory standard subject to identified need.

Gypsy and traveller provision

- 3.8.6 The Mayor is clear that “people from different communities should be free to lead their lives in different ways subject to the need for mutual respect and responsibility the planning system should ensure fairness between the settled and traveller communities” (LP Paragraph 3.56). He recognises that meeting the needs of gypsies and travellers including travelling show people is a strategic issue, but one that is more effectively addressed at the local level. This is because these needs are on a smaller scale relative to those of other groups with particular housing needs, and their impacts are essentially local, so they are most effectively addressed at the local level in light of local circumstances by the agencies best placed to do this – the boroughs. The LP (Policy 3.8B i) therefore requires boroughs to ensure these needs are identified and addressed by them in line with national policy¹⁹⁸, in coordination with neighbouring boroughs and districts as appropriate.
- 3.8.7 Where there are issues over cross border coordination of provision, the Mayor will provide support to address these if requested by relevant authorities in circumstances where strategic action will ‘add value’ to the process.

Custom build

- 3.8.8 The NPPF and the London Plan require boroughs to identify the number of people who wish to build their own home. The GLA has established a pilot London wide register for those who are interested in self build /custom build and who have a reasonable prospect of being able to finance such a project. This will provide a resource to understand demand and will help boroughs develop appropriate policies.
- 3.8.9 Given land scarcity, land prices and the high level of housing need in London, group custom build is likely to be more appropriate than single plot schemes as this can be delivered at higher density. The Mayor is keen to develop a custom

¹⁹⁸ CLG. Planning policy for traveller sites. CLG, 2012

build offer that is relevant to London. To this end he developed the “Build your own home – the London Way” initiative which provided funding to support Custom Build and to support community led groups aiming to achieve Community Right to Build Orders. In addition, the Custom Build Serviced Plots Loan Fund makes direct investments through loans to bring forward serviced building plots for custom build projects. The fund will bring forward sites of five or more serviced plots. These are ‘shovel ready’ sites with planning permission in place, where plots or parcels of land are laid out and the land is ready for construction, access is provided and each plot or parcel has utilities/services provided to the plot/parcel boundary.

3.9 STUDENT ACCOMMODATION

- 3.9.1 Directly and indirectly London’s higher education sector is an important part of London’s offer as a world city, as well as meeting national and more local education needs and contributing to its economy¹⁹⁹. While many students live at home or find housing in the private rented sector, specialist student accommodation makes an essential contribution to the attractiveness of London as an academic centre of excellence. Though there is uncertainty over future growth in the London student population and its specialist accommodation needs, the Mayor’s Academic Forum²⁰⁰ has produced an assessment of the future need for purpose built student accommodation places, which informed the 2015 London Plan. The London Plan 2015 shows that the requirement for purpose built student accommodation (PBSA) over the 10 years to 2025, including the unmet demand, could be for 20,000 – 31,000 places.
- 3.9.2 The Plan’s 20,000 place capacity for specialist student accommodation was identified as part of the Strategic Housing Land Availability Assessment. Normally housing provision would be subject to the requirements of the Plan’s affordable housing policy, but because student housing is used to meet distinct needs this requirement is not generally applied if the student accommodation is secured as such by planning agreement. It is therefore monitored separately as part of overall housing provision (London Plan paragraph 3.53B-C).
- 3.9.3 In considering LDF policy approaches to, and proposals for new student accommodation, boroughs should not constrain provision which meets strategic as well as local needs (Policy 3.8B h). The Mayor is conscious that the clustering of

¹⁹⁹ For example: PA Consulting Group. Study London. The economic impact of international students to London’s economy: a quantitative perspective. PA Consulting, 2011 and ONS, Statistical Bulletin. Migration Statistics Quarterly Report No 10. ONS, 2011

²⁰⁰ The Mayor’s Academic Forum is composed of representatives from the boroughs, universities, private and voluntary sector accommodation providers and students, and is chaired and serviced by the GLA. The report of the Forum’s recommendations for the FALP can be downloaded from this webpage: <https://www.london.gov.uk/what-we-do/planning/who-we-work/planning-working-groups/mayor%E2%80%99s-academic-forum>

higher educational institutions in and around central London means that particular pressure has fallen on a relatively small number of boroughs there to meet student needs, and that this should not compromise their capacity to meet more general housing requirements, especially for affordable family homes, or the need to secure mixed and balanced communities. The London Plan 2015 encourages a more dispersed distribution of new student accommodation to reduce pressures on central boroughs and utilise development and regeneration potential in accessible locations outside central London (see para. 1.2.50).

Affordable student accommodation

- 3.9.4 The Mayor's Academic Forum reported that universities and students consider affordability to be the key issue in student housing provision in London, particularly for purpose built, direct let accommodation. It recommended that the London Plan should introduce a requirement for such accommodation to include an element of provision. that is affordable for students
- 3.9.5 The details of what is defined as 'affordable student accommodation' in this context and how it will be implemented are set out below. However, the London Plan seeks the development of student accommodation which is more affordable for the student body as a whole (London Plan para. 3.53A). The type of student accommodation developed and its location will have implications for its rental cost. Purpose Built Student Accommodation (PBSA) formed of studios and ensuite rooms are likely to have higher rental costs than non-ensuite bedrooms, and the rental cost for these rooms, particularly in central London, can be unaffordable to the majority of students in the UK. Therefore, providers of PBSA are encouraged to develop models for delivery of PBSA in London which minimise rental costs, via its layout and location, for the majority of the bedrooms in the development and bring these rates nearer to the rate of affordable student accommodation described below.
- 3.9.6 To improve transparency in the setting of rent levels, universities and private provider of PBSA are encouraged to allow the participation of student representatives in their rent setting process.

Requirement for affordable student accommodation

- 3.9.7 The requirement for this element of 'affordable student accommodation' recommended by the Mayor's Academic Forum is set out in paragraph 3.53B of the London Plan 2015.
- 3.9.8 The requirement for affordable student accommodation will apply when a provider of student accommodation does not have an undertaking with a specified academic institution(s) that specifies that the accommodation will be occupied by students of that institution(s). To avoid confusion an "undertaking" is a nominations agreement between a provider of PBSA and one or more academic institutions. The affordable student accommodation is required to be maintained for as long as the development is used as student accommodation. Therefore,
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for a development to be exempt from the affordable student accommodation requirement Boroughs should ensure, through condition or legal agreement, that the development will continue to maintain a nominations agreement or enter new nomination agreements with one or more specified academic institutions for as long as it is used as student accommodation or such time period as the Borough considers is appropriate to justify the exemption. Drawing on the recommendations of the Forum²⁰¹ guidance is set out below on how affordable student accommodation can be defined, delivered and retained.

Definition of affordable student accommodation:

3.9.9 For the purpose of providing affordable student accommodation affordability has been determined by considering the following questions:

- What is an average student income in London?
- What proportion of a student's income is considered reasonable to spend on accommodation costs, whilst also taking into consideration the rental cost of accommodation provided by London universities?

3.9.10 For the purposes of the London Plan the average student income is based on the maximum income that a new full-time student studying in London and living away from home could receive from the government's maintenance loan for living costs,²⁰² For example in the academic year 2016/17 the maximum income a new full-time student studying in London and living away from home could receive from the maintenance loan is £10,702.

3.9.11 The proportion of an average student's income (defined above) that is considered reasonable for them to spend on accommodation costs takes into consideration: the costs of the utilities and added services included in the rent of Purpose Built Student Accommodation (PBSA); the short term nature of the time a person lives in student accommodation; and the average rent for standard rooms charged by London universities. Taking these factors into account it is considered that a student in London could spend up to 55% of their income on the cost of accommodation in PBSA. The affordable student accommodation rent must include the same packages of services and utilities that are included in the market rents rate.

3.9.12 To ensure the figure is up-to-date, the Mayor will publish, in his Annual Monitoring Report for the London Plan, the annual rental cost for PBSA that is considered

²⁰¹ The Mayor's Academic Forum paper: Affordable student accommodation planning guidance discussion paper January 2015 provides background information as to how the definition of affordable student accommodation was determined. An addendum to this paper was prepared in January 2016 to explain how the changes to the maintenance grant have affected the definition of affordable student accommodation. The paper with addendum can be downloaded from <https://www.london.gov.uk/what-we-do/planning/who-we-work/planning-working-groups/mayor%E2%80%99s-academic-forum>

²⁰² Further information on the maintenance loan and grant can be found at <https://www.gov.uk/student-finance/new-fulltime-students>

affordable for the coming academic year based on the following formula:

$$\boxed{\text{Annual rental cost for affordable PBSA in London}} \leq \boxed{\text{Average student income}^*} \times \boxed{0.55}$$

*Average student income equals the maximum student maintenance loan for living costs available to a UK full-time student in London living away from home.

3.9.13 Using the above formula the annual rental cost for affordable PBSA in London for the academic year 2016/17 is £5,886 or less. For a 38-week contract this equates to weekly rent of £155.

Amount of affordable student accommodation

3.9.14 The element of affordable student accommodation provided in a development should be the maximum reasonable amount subject to viability. When determining the level of need for the affordable student accommodation boroughs may wish to take into consideration the percentage of all students in England that receive the means-tested maintenance grant for living expenses (this was 29% for the academic year 2012/13²⁰³ and for London students the percentage was 33% in 2013/14²⁰⁴). In 2016 the maintained grant will be ended for new students. A proportion of the maintenance loan is means tested (49.8% in London²⁰⁵) and only students with lower household incomes are eligible for this part of the loan, in a similar way that only lower income households are eligible to receive the maintenance grant. Comparable information on the number of students that received the income assessed element of the maintenance loan, to those students receiving the maintenance grant will become available in the years following the abolition of the maintenance grant.

3.9.15 To enable providers of PBSA to maximise the delivery of affordable student

²⁰³ In 2012/13 555,700 students in England received the maintenance grant; this represents 29% of all students in England (including overseas students, postgraduate students and part-time students who generally are not eligible for the maintenance grant). Only students with annual household incomes below £42,600 are eligible to receive any grant award. Of these awards 391,500 (20% of all students) were for the full grant award and thus had household incomes below £25,000. (Source: Table 3A(i) in Student Support For Higher Education in England, Academic Year 2013/14 (Provisional) <http://www.slcs.co.uk/media/5412/slcsfr052013.pdf>). In 2012/13 there were 1,944,995 students in England of which 1,499,870 were undergraduate students and of these 1,140,600 were full time (Source: Higher Education Statistics Agency Headline Statistics for 2012/13 <https://www.hesa.ac.uk>)

²⁰⁴ In 2013/14 there were 382,605 students registered at Higher Education providers in London (Source: http://www.londonhigher.ac.uk/fileadmin/documents/Publications_2015/LH_HESASTudents2015.pdf) of these students 127,500 received the maintenance grant (107,800 received the full grant award), this represents 33% of all London students, including overseas and postgraduate students (Source: Student Loans Company FOI – Ref 20150319-01).

²⁰⁵ Source Memorandum: Support Available Under The Education (Student Support) Regulations for 2016/17, BIS <http://www.practitioners.slcs.co.uk/media/6258/financial-memorandum-for-201617.pdf>

accommodation by increasing the profitability of the development, boroughs should consider allowing the temporary use of accommodation during vacation periods for ancillary uses. Examples of such uses, amongst others, include providing accommodation for conference delegates, interns on university placements, and students on short-term education courses at any institution approved in advance by the borough. Conditions and or legal agreements could be attached to any planning permission to ensure that the ancillary use does not result in a material change of use of the building.

3.9.16 When determining the amount of affordable student accommodation to be provided boroughs will need to take into account the viability implications of locally specific requirements for PBSA developments in their local plans, such as student bursaries and CIL charges. Local requirements may reduce the level of affordable student accommodation that is viable.

3.9.17 Affordable student accommodation is not eligible for social housing relief from CIL charges. When revising CIL charging schedules Boroughs should take account of the affordable student accommodation requirement in the London Plan. Boroughs may wish to consider the viability of the affordable student accommodation and apply nil or reduced rates compared to market PBSA, based on the outcome of the viability assessment, where affordable student accommodation rents are secured.

Eligibility and allocation of the affordable student accommodation

3.9.18 Eligibility for the affordable student accommodation is based on an assessment of need. To be eligible for an affordable student room in PBSA the students must be eligible for the income assessed element of a UK government funded maintenance loan for living expenses²⁰⁶ for the academic year they stay in the student accommodation.

3.9.19 The private provider can allocate the affordable student accommodation rooms to eligible students either directly or allow the Higher Education Institutions (HEI) to allocate the rooms to those eligible students they consider most in need of the accommodation. The University of London's has proposed a mechanism for allocating, via a central body, the affordable student accommodation to those students that Higher Education Institutions (HEI) consider most in need of the accommodation. This proposal has attracted widespread support from both the private and Higher Education sectors, and the establishment of such an allocations body is supported. The model for this body can be based on a system operated by the University of London Housing Services (ULHS) to allocate rooms in its Intercollegiate Halls. The aims of having a central body to deliver this coordinated service are:

²⁰⁶ For the academic year 2016/17 students with annual household incomes below £69,803 are eligible to receive the income assessed element of the maintenance loan for living expenses (Source: <http://www.practitioners.slc.co.uk/media/6258/financial-memorandum-for-201617.pdf>)

- To prioritise the affordable student accommodation for those students most in need and do so in a transparent manner.
- To remove the administrative burden of allocation from private providers.
- To help ensure there is no unnecessary duplication of support for students, where a student receives multiple forms of financial support (e.g. bursaries, hardship funds) from different sources.

3.9.20 This body would not preclude private providers and HEIs from developing their own individual agreements. However, once properly established to deal with allocations through London, it is anticipated that this body will, by preference of providers, become the sole allocator of affordable student accommodation. The establishment of this central allocation body will be through a monitoring group details of which are given in paragraph 3.9.25.

Securing and maintaining the affordable student accommodation

3.9.21 The amount of affordable student accommodation provided in a development and its rental costs should be secured and managed through a legal agreement for as long as the development is used for student accommodation.

3.9.22 The initial annual rental cost for the element of affordable accommodation should not exceed the level set out in the GLA's AMR for the relevant year based on the formula described in paragraph 3.9.12 (for 2016/17 the rental cost is £5,886 as set out in paragraph 3.9.13). For following years the rental cost for this accommodation can be linked to changes in a nationally recognised index of inflation such as the as the Consumer Prices Index or CIPH. A review period, e.g. every 3 years, could be set by the borough to allow for recalibrating the affordable student accommodation to the level stated as affordable in the GLA's AMR.

3.9.23 Boroughs should receive monitoring information from the provider regarding the number of affordable student rooms let each year and the rent charged for the accommodation. The rent charged must include all services and utilities which are offered as part of the package for the market rate rooms in the development. There should be no additional charges specific to the affordable accommodation. The affordable accommodation should meet the same design and accessibility requirements as the market rate rooms in the development.

3.9.24 The effective management of PBSA is key to student's satisfaction with their accommodation. To facilitate a constructive relationship between students and providers of PBSA, providers are encouraged to establish and maintain effective lines of reporting and communication of maintenance and welfare issues with their student residents.

Affordable student accommodation monitoring group

3.9.25 To monitor the implementation of the affordable student accommodation policy and aid the establishment of a central allocations body a monitoring group will be established. This monitoring group will be initiated by the Mayor's Academic Forum and it is intended it will include representatives from the HE sector, NUS, private developers and local authority members.



PART 4:

AFFORDABLE HOUSING – VIABILITY APPRAISALS

4.0.1 At time of publication the Housing and Planning Bill was making its way through the legislative process which has significant implications for how we plan for affordable housing in London. Therefore, other than this section dealing with viability, the majority of the Affordable Housing chapter consulted on has not been published and remains as draft. It is likely that further guidance or advice on affordable housing will be required once more detail is known about the Government's approach and its implications for London.

4.1 VIABILITY APPRAISALS

4.1.1 Since the publication of the NPPF viability has been a key part of the planning process, both at the plan making and planning decision stages. The NPPF requires all development plans to be deliverable. The cumulative impacts of all standards, obligations and requirements have to be tested to ensure that they do not put implementation of a plan at serious risk, and they should facilitate development throughout the economic cycle (NPPF para 174). All plans adopted post NPPF should be considered viable - negotiations to reduce obligations based on site specific viability considerations should only be necessary where the site circumstances suggest exceptional or abnormal costs that will make policy compliance unviable. Development appraisals should be provided to establish the maximum reasonable level of affordable housing for each site.

4.1.2 In undertaking an economic viability assessment applicants and borough should take into account the impact of any planning obligations sought for benefits other than affordable housing, recognising that requirements for contributions to schools, environmental improvements, transport or social infrastructure, may limit the number and mix of affordable homes. Policy 8.2 sets out the Mayor's priorities for planning obligations, placing the highest strategic priority on contributions to affordable housing and transport infrastructure. Account must also be taken of the strategic Crossrail S106 contributions (which does not apply to housing but can apply to some other elements of a mixed use development) and of the Community Infrastructure Levies (CIL) set by Local Planning Authorities and the Mayor.

4.1.3 The Development Appraisal toolkit²⁰⁷ is available to boroughs, and they are encouraged to use it. It is also available from the GLA for purchase by other parties. In 2014 an improved version of the Toolkit was released which was updated in response to an earlier review²⁰⁸. In addition, the strategic values within the toolkit have been updated for 2015/16. Boroughs are strongly advised to use more local information which reflects their local circumstances rather than these defaults. In particular, applicants and boroughs must give careful consideration to what constitutes a reasonable rate of return on particular developments and not to automatically use the default value provided in the toolkit. As part of a

²⁰⁷ The GLA Development Appraisal Toolkit 2015 -Andrew Golland

²⁰⁸ BNP Paribas Real Estate. Development Control Toolkit Model – review of 2011 version. GLA, 2012

development specific viability appraisal, applicants should provide site specific justification for their assumed profit levels with reference to up to date market conditions, comparative investment returns, site and location specifics and associated risks . Further details of the data sources and methodology are set out in the toolkit guidance notes²⁰⁹.

- 4.1.4 It should be noted that the NPPF's benchmark for viability appraisal is that it should "take account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable". In light of inference to the contrary²¹⁰, either 'Market Value', 'Alternative Use Value', 'Existing Use Value plus' based approaches can address this requirement where correctly applied (see below); their appropriate application depends on specific circumstances. **On balance, the Mayor has found that the 'Existing Use Value plus' approach is generally most appropriate for planning purposes, not least because of the way it can be used to address the need to ensure that development is sustainable in terms of the NPPF and Local Plan requirements, he therefore supports this approach.** The 'plus' element will vary on a case by case basis based on the circumstances of the site and owner and policy requirements.
- 4.1.5 A 'Market Value' approach is only acceptable where, in line with the NPPG²¹¹, the value reflects all policy requirements and planning obligations and any CIL charges. Recent research carried out by RICS²¹² found that the 'Market Value' approach is not being applied correctly and "if market value is based on comparable evidence without proper adjustment to reflect policy compliant planning obligations, this introduces a circularity, which encourages developers to overpay for sites and try to recover some or all of this overpayment via reductions in planning obligations" (RICS 2015²¹³ p26). Thus a market value approach should only be accepted where it can be demonstrated to properly reflect policy requirements and take account of site specific circumstances. In many cases this will require an adjustment of market comparables to take account of policy compliant planning obligations.
- 4.1.6 Likewise, if an 'Alternative Use Value' approach is used it must also reflect policy requirements. In addition, the approach should only be used if the alternative use would fully comply with development plan polices and it can be demonstrated that the alternative use could be implemented on the site in question.
- 4.1.7 The results of different types of viability appraisal can be bench-marked to the GLA Development Appraisal Toolkit²¹⁴, and consideration should be given to the

²⁰⁹ Mayor of London. GLA Development Appraisal Guidance Notes (2015). GLA, 2015

²¹⁰ RICS Financial Viability in Planning 2012 *ibid*

²¹¹ NPPG Viability and decision taking. Land value. Reference ID: 10-023-20140306

²¹² RICS Financial Viability Appraisal in Planning Decisions: Theory and Practice. April 2015

²¹³ *ibid*

²¹⁴ BNP Parisbas Real Estate 2012 *ibid*

use of independent valuation advice.

- 4.1.8 Applications referable to the Mayor: where an application is referable to the Mayor, the GLA expects the financial appraisal to be included in the referral documentation. This should be undertaken at the stage 1 referral stage. If it is not provided at this point, the Mayor's planning decisions staff will request either that it be submitted, or that the information necessary for the GLA to carry out the appraisal itself be provided.
- 4.1.9 If the necessary information is not provided, any recommendation to the Mayor will be conditional upon provision of an appraisal or information before the stage 2 report on the basis of which the Mayor decides whether or not to make a direction on an application. If necessary the GLA will contact borough housing and planning departments and other relevant agencies to check investment decisions and the timetable for investment.
- 4.1.10 In projects being developed in phases it may be necessary to reach separate agreements on grant and affordable housing outturn on different phases. It may be appropriate that each phase should be subject to a separate planning application.

4.2 TRANSPARENCY OF INFORMATION

- 4.2.1 As noted above, the London Plan now makes clear that developers should provide development appraisals to demonstrate that each scheme maximises affordable housing output²¹⁵. Developers are required to supply viability information where necessary to demonstrate that a scheme is maximising affordable housing. A recent judgement has helped clarify the circumstances in which requests for details of such appraisals under Freedom of Information regimes may be upheld²¹⁶.
- 4.2.2 The Environmental Information Regulations 2004 include a duty to provide 'environmental information'. This covers a broad spectrum of information and can include the costs associated with development. All exceptions to this are qualified by a public interest test and the Greenwich decision²¹⁷ demonstrates that public interest will often outweigh commercial confidentiality arguments. The Greenwich judgement stated "We find it particularly hard to accept that the pricing and other assumptions embedded in a viability appraisal are none of the public's business. Public understanding of the issues fails at the starting line if such information is concealed". **Therefore, the Mayor encourages the transparency of information to increase public trust in the planning process and asks developers to keep confidential information to a minimum.**

²¹⁵ London Plan 3.71

²¹⁶ Warren NJ. First Tier Tribunal General Regulatory Chamber Information Rights. EA/2014/0122. RB Greenwich. 30th January 2015

²¹⁷ Ibid

4.3 CONTINGENT OBLIGATION, REVIEW MECHANISMS AND CASCADES.

- 4.3.1 To maximise affordable housing output (and other public benefits) on schemes with long build out times, at times of economic uncertainty, and/or where there are significant changes in costs or values the Plan provides support for the use 'contingent obligations' and review mechanisms.
- 4.3.2 Contingent obligations and review mechanisms provide a reappraisal mechanism which specifies the scope of a review of viability for longer-term, non-phased schemes and for each phase of phased developments. These mechanisms allow increases in Section 106 contributions to reflect changes in the value of the development from application to a specific point in time/stage of development and help ensure that affordable housing provision is maximised. Review mechanisms should be based on the most robust data available, this generally will be the price paid for the completed unit. However, this will depend on the timing and specifics of the review(s).
- 4.3.3 Review mechanisms are encouraged to be considered when a large scheme is built out in phases and/or is built out over a long period of time. The mechanism should specify the scope of a review of viability for each phase or relevant phase of development. For schemes with a shorter development term consideration should be given to using S106 clauses to trigger a review of viability if a scheme is not substantially complete by a specified date. Such approaches are intended to support effective and equitable implementation of planning policy while also providing flexibility to address viability concerns.
- 4.3.4 These arrangements must address the requirements of legislation and national guidance, which can provide the basis for securing affordable housing. In addition they should recognise that applications must be determined on the basis of the information available at the time whilst taking account of the fact that viability may be different at the time of implementation.
- 4.3.5 In making arrangements for review mechanisms, boroughs should be mindful of the need to:
- identify the point(s) at which the reappraisal review should be carried out;
 - establish on a case-by-case basis the threshold level(s) of viability at which additional planning obligation contributions will be required;
 - establish what the review will assess: for example some reviews assess all aspects of a development appraisal, while others are limited to changes in gross development value (GDV) or GDV and build costs;
 - establish if the review 'looks back' i.e. calculates additional contributions based on the completed phase or if the review 'looks forward' and uses information from the completed phase to inform the requirements of the next phase;
 - set a 'cap' on the additional provision that will sought based on ensuring policy compliance (for example, if a borough's affordable housing policy requires
-

50% affordable housing, the cap would be meeting the 50% requirement). This is important as an 'open ended profit share' is unlikely to meet the tests of a planning obligation;

- agree the 'profit split' between the developer and borough once the threshold level of viability has been reached. The split will depend on site specifics and the timing of the review and will need to be justified on a case by case basis. Recent appeal decisions suggest that in some circumstances it is justified to require that 100 percent of profit surpluses are used to deliver affordable housing subject to a policy compliant cap, whereas other decisions have suggested a split between council and developer is needed to ensure sufficient incentive²¹⁸; and
- set out the expectation for additional homes on or off site, or for receiving a financial contribution. The London Plan prioritises on site affordable housing. However, where the design and layout of the scheme has been agreed, boroughs should take account of the potential practical implications of delivering increased amount of affordable housing on site which may mean a commuted sum would be acceptable.

4.3.6 Affordable housing requirements are applied where they are required to make an application acceptable in planning terms. Thus, review mechanisms should not be used to reduce the base level of affordable housing contributions which are required as part of the planning permission. This would require a new or modified planning permission. Section 106BA of the Town and Country Planning Act 1990 allows applications to be made to modify affordable housing requirements based on economic viability. However, a reduction in affordable housing may mean the application is no longer acceptable in planning terms.

4.3.7 Cascade agreements are intended to deal primarily with uncertainties over/ changes to the funding of affordable housing. They are intended to provide an equitable framework to enable developers, boroughs and other relevant stakeholders to work together to maximise affordable housing output in these conditions. Affordable housing grant is not usually available for affordable units delivered through section 106 schemes unless it can be proved that additional units are being delivered. However, in some circumstances a cascade agreement may be appropriate;

4.3.8 A cascade agreement is based on a financial appraisal, which links the required affordable housing output to the availability of resources for affordable housing.

4.3.9 It should specify the range of affordable housing that can be delivered on the scheme given different levels and types of resourcing. The upper level of this range should be the preferred affordable housing output for the site, having regard to LP policy to seek the maximum reasonable amount of affordable housing.

²¹⁸ See Appeal Decisions APP/V5570/A/14/2226258 & APP/V5570/E/14/2226261 and APP/V5570/A/14/2227656

4.3.10 The minimum affordable output should be what can be delivered if resources are not available through a registered provider. Cascade agreements should allow for the preferred level of affordable output to be reduced if the required level of public investment should not be available and increased if additional grant is made available.

4.4 RENEGOTIATION OF AFFORDABLE HOUSING REQUIREMENTS AND SECTION 106BA APPLICATIONS

4.4.1 To ensure continued delivery of identified affordable housing supply, LPAs are strongly encouraged to ensure that developers seeking to renegotiate affordable housing requirements on a consented scheme first explore the possibility of obtaining additional grant to maintain the agreed level and tenure of affordable housing in the extant planning permission.

4.4.2 Where grant is not available to maintain the level and mix of affordable housing, LPAs should seek to obtain the maximum reasonable amount of affordable housing, taking into account housing need and the change in circumstances that have led to the application for a renegotiation of permission. Both changes in types of affordable housing and reductions in the number of affordable housing units will need to be justified on viability grounds. It should be noted that Section 106BA, which allows applications to be made to modify the affordable housing requirements of any Section 106 agreement regardless of when it was signed, must be based on economic viability and cannot take into account other aspects of the planning consent.

4.5 COVENANTED BUILD TO RENT

4.5.1 The London Plan encourages boroughs to take account of the distinct economics of private rent when assessing affordable housing contributions from covenanted private rented schemes (see section three).

4.6 FIXED AFFORDABLE HOUSING TARGETS

4.6.1 As discussed in the supply section LPAs may consider applying a fixed percentage affordable housing target for opportunity areas and housing zones. This can help provide certainty to developers and land owners about the affordable housing requirements and help prevent land price rises based on hope value. The percentage should be based on an understanding of the maximum reasonable amount of affordable housing based on the specifics of that area (including social infrastructure, utilities and transport requirements). With the application of a fixed percentage, where an applicant meets the affordable housing target, there would be no requirement to assess if that is the maximum reasonable for that site (as it is accepted that it is the maximum reasonable for the area).



PART 5:

STOCK AND INVESTMENT

5.1 LONDON'S HOUSING STOCK

5.1.1 To meet London's increasing housing need, it is important to ensure best use is made of the existing housing stock. The overall quantity, quality and type of housing provision available will need to be sustained, enhanced, and where necessary renewed.

Empty homes

5.1.2 Policy 3.14 encourages boroughs to promote the efficient use of the existing stock of homes by reducing the number of vacant homes, particularly long-term vacancies²¹⁹. The Mayor's Housing Strategy sets out a strategic aim that no more than 1% of homes in London should remain empty for longer than 6 months. Bringing vacant properties back into residential use can contribute to meeting London Plan housing supply targets. In line with national guidance²²⁰, boroughs should avoid double-counting. New Homes Bonus funding can be secured when vacant properties are brought back into use.

5.1.3 Official DCLG statistics²²¹ show that vacancy across London is at an all-time low. The overall number of long-term vacant homes in London halved between 2004 and 2013. Long-term empty homes in London in 2013 equated to only around 0.64% of the total stock of homes²²². The SHLAA assumes that vacant properties returning to use will continued to provide a source of net housing supply in London to 2025.²²³

5.1.4 Where there is evidence that properties are being left empty for long periods, the London Plan encourages boroughs to address this and promote the efficient use and occupation of homes (Policy 3.14D). To dis-incentivise empty properties a 50% additional council tax premium may be applied to properties which have been left unoccupied and unfurnished for over 2 years. Local authorities can now set the amount of council tax discount to be applied to second homes.

Overseas investment in prime London

5.1.5 London is a global city that welcomes international investment. This plays an important role in enabling development and economic growth. There is a perception that new build dwellings and existing homes in particular areas of London are being purchased as investment vehicles and left empty. This perception may be fuelled by the high proportion of new build properties being purchased by overseas buyers especially in prime London²²⁴. However, research shows the majority of new build properties sold to international purchasers in

²¹⁹ Homes which are vacant for over 6 months

²²⁰ DCLG, Planning Practice Guidance, Paragraph: 040 Reference ID: 3-040-20140306

²²¹ DCLG Live Table 615: vacant dwellings by local authority district: England, from 2004

²²² This compares DCLG dwelling stock estimates with long term vacant dwelling, using 2013 statistics

²²³ Mayor of London, London Strategic Housing Land Availability Assessment, 2013, pages 73-74

²²⁴ Savills Word Research, Spotlight: The world in London – capital appreciation, 2013, Uk Savills

prime London are either rented out or lived in as main residences²²⁵. To ensure new homes are marketed to Londoners in London before or at the same time as they are available to buyers from other countries, the Mayor has launched a new concordat which has been signed by over 50 developers²²⁶.

Housing quality

5.1.6 Where possible, boroughs and other stakeholders should maintain and improve the quality and condition of London's existing housing stock. The London Housing Strategy outlines a range of funding measures aimed at retrofitting and improving the standard and energy efficiency of existing homes in London²²⁷. Boroughs should reduce the number of unfit or unsatisfactory dwellings, taking into account the Government's Decent Homes Standard. Boroughs should take action to address particularly poor standards of unauthorised housing provision, including 'beds in sheds'.

Short term lettings

5.1.7 Though London Plan Policy 3.14C states the loss of housing provision to short-term provision should be resisted, legislative changes²²⁸ now mean householders may rent out their properties for temporary sleeping accommodation for up to 90 days of the year without the need for planning permission. Previously, planning permission was required.²²⁹ Policy 3.14C should now be read in the context of these legislative changes. However, the core principle to prevent the loss of permanent housing to short-term lettings should be followed where short-term lettings are undertaken on full-time commercial basis. Under the Deregulation Act, householders do not need to inform their local authority that they are letting out their properties on a short-term basis, so it may be difficult in practice for boroughs to monitor lettings and manage potential housing loss. Boroughs may apply to the Secretary of State to exempt particular areas or residential premises from these reforms.

Resisting the net loss of housing

5.1.8 London Plan Policy 3.14B-C requires boroughs to resist the net loss of housing provision, taking into account existing densities, floorspace provision and housing tenure. This recognises that there may be scope to sustain and, where necessary, increase the overall stock of homes through sensitive housing intensification and renewal (Policy 3.3Ee). Redevelopment of existing properties may be appropriate where it would provide additional housing through higher residential densities. It may also enable improvements in housing quality and help to address particular housing needs, for example, the requirements of large families or older and vulnerable people.

²²⁵ Savills Word Research, Spotlight: The world in London – capital appreciation, 2013, Uk Savills

²²⁶ Mayor of London, Mayoral Concordat on new homes for Londoners, GLA, 2014

²²⁷ Mayor of London, Homes for London: The London Housing Strategy, 2014, GLA, Section 2.7 – 2.8

²²⁸ Clause 44 of the Deregulation Act 2015

²²⁹ Section 25 of the Greater London Council (General Powers) Act 1973

- 5.1.9 As a minimum, equivalent residential densities and floorspace should be provided where existing homes are redeveloped. Subject to other policy considerations, higher residential densities are encouraged, alongside more generous floorspace provision. As a general rule, floorspace provision should be calculated and assessed across a site as a whole. However, to address identified housing need, it may be appropriate to require the re-provision of existing family homes with at least equivalent floorspace in terms of units or habitable rooms.
- 5.1.10 Emphasis on resisting the net loss of housing should be an important factor when considering proposals to replace or convert a number of smaller existing units with very large homes, especially where this would not address local housing need. Further guidance on residential conversions is provided in Section 1.2. Where larger family sized properties are required to address the needs of particular communities (Policy 3.8Bf), housing may be re-provided at marginally lower unit densities and the requirements of Policy 3.14B should be applied flexibly.

Specialist accommodation for older and vulnerable people and employees

- 5.1.11 Residential accommodation for particular groups including older and vulnerable people, together with hostels, shared accommodation and provision for particular employees (eg health workers, police officers and hotel staff) are important forms of housing provision which should be positively supported, sustained and enhanced where necessary. Existing provision should be retained where possible, except where there are acceptable plans for its replacement, with existing floorspace re-provided to an equivalent or better standard²³⁰.
- 5.1.12 New specialist accommodation and care facilities for older Londoners may necessitate the conversion or redevelopment of existing residential properties. Where this would be appropriate, the provisions of Policy 3.14B in terms of equivalent floorspace provision should be applied flexibly. It should be recognised that residential accommodation for older people does constitute housing provision and will contribute to meeting London Plan housing supply targets, whether this is in C2 or C3 use class. Where specialist residential accommodation for older people would achieve higher residential densities, this should be positively considered by boroughs taking into account Policy 3.14B. Further guidance on housing provision for older people and other distinct groups is provided in Part 3 – Choice.

Estate renewal

- 5.1.13 As a general guide, where redevelopment of affordable housing is proposed, it should only be permitted where it is replaced by better quality accommodation, providing at least equivalent floorspace of affordable housing. The Plan provides flexibility to take into account local circumstances when considering individual proposals for estate renewal in terms of:

²³⁰ See Mayor of London, London Plan, 2015, GLA, Policy 3.14C and paragraph 3.81

- the regeneration benefits to the local community
- the proportion of affordable housing in the surrounding area and the need to provide mixed and balanced communities (Policy 3.9)
- the amount of affordable housing intended to be provided elsewhere in the borough.

5.1.14 Calculations of whether there is a loss of affordable or overall housing provision can be made on the basis of habitable rooms rather than dwellings, where the redevelopment of an estate is providing a housing mix more appropriate to the needs of both existing and prospective future residents – for example where there is increased provision of dwellings for larger households.

5.1.15 In calculating whether there is any net loss of affordable housing through estate renewal, former social rented properties sold under the right to buy /right to acquire should be categorised as market sector provision. The objective of no net loss of provision should generally be achieved without taking into account areas outside the estate boundary. This can include making more effective use of underused open space or non-residential sites within the overall estate boundary. Replacement of social/affordable rented units by intermediate provision is acceptable where it can be robustly demonstrated that this would achieve a more appropriate range of housing provision in a neighbourhood or borough and contribute to achieving more a mixed and balanced community. Replacement of social rent by affordable rent provision may be necessary in order to maximise affordable housing provision.

5.1.16 To achieve no net loss, development at significantly increased density may be necessary to generate sufficient value from market development to support replacement of affordable housing provision, or to achieve a more mixed and balanced community. In such a case, the net gain in total provision need not achieve the usual proportion of affordable housing provision expected from a new build development.

5.1.17 The redesign of estates should maximise active frontages and minimise inactive frontages where buildings face publically accessible space in order to increase natural surveillance and activity (Standard 10).

5.1.18 Effective engagement with the existing community²³¹ should be an integral part of the estate renewal process. Though some upheaval may be inevitable in improving and extending the stock, the impact of this can be minimised by taking account of local residents' views and incorporating these in the phasing and management of renewal.

²³¹ HM Government Housing Strategy op cit paras 6.17 - 20

5.2 HOUSING DEVELOPMENT AND INVESTMENT

- 5.2.1 Delivering 49,000 new homes a year to meet London's need will necessitate a step change in housing delivery. This will require coordinated investment and planning in relation to housing, transport, economic development and social infrastructure, together with effective cross-boundary working. This is especially important during a period of limited public sector resources available to fund infrastructure and housing provision.
- 5.2.2 Policy 3.15 requires boroughs to ensure close alignment of local and strategic investment programmes to support the implementation of housing policies in the London Plan. This includes those on housing supply (3.3), affordable housing (3.11), opportunity areas (2.13), large sites (Policy 3.7) and optimising housing potential (3.4). As well as being in general conformity with the London Plan, local plans should be informed by and support the Mayor's Housing Strategy, Transport Strategy and Economic Development Strategy.
- 5.2.3 To support and accelerate the delivery of housing provision, local plans and the minimum housing provision targets identified in Table 3.1 of the London Plan should both inform and shape other local strategies and investment programmes in relation to transport, housing, asset management, regeneration and economic development. The spatial approach of the London Plan to focus higher residential densities in opportunity areas, town centres and large brownfield sites should be supported and enabled by cross-cutting strategies and investment decisions at a strategic and local level.
- 5.2.4 Publicly owned land will play an important role in accelerating the delivery of additional housing provision across a wide range of tenures including the provision of additional affordable homes. This underlines the need for all public bodies to work collaboratively to bring forward potential housing capacity on surplus sites.
- 5.2.5 Planned housing growth should be aligned with the short to medium term business plans of infrastructure delivery agencies. This includes private utilities companies, health and education providers, Transport for London and Network Rail. These organisations should work closely with boroughs and, where necessary, the GLA to identify the infrastructure necessary to support housing growth and coordinate and enable its provision. Capital investment and phasing requirements should be highlighted, together with funding and delivery mechanisms. The potential to maximise the use of existing infrastructure and facilities through proactive asset management should be explored positively. Borough-wide Infrastructure Delivery Plans (IDPs) or more targeted area-based Development and Infrastructure Funding (DIF) studies should be prepared where necessary.
- 5.2.6 Effective infrastructure planning is not a one-off process. Infrastructure assessments should be living documents which are regularly monitored, reviewed
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and updated. Looking at a more strategic and longer-term horizon, the London Infrastructure Plan 2050 identifies the level of capital investment and new infrastructure required to support population and housing growth in London which will inform the Full Review of the London Plan and support the case for further long-term investment.

- 5.2.7 Boroughs should explore all sources of available public funding when examining funding gaps and determining the level of developer contributions required through the Community Infrastructure Levy or s106. Whilst CIL and s106 funding provides a highly valuable contribution towards the cost of infrastructure needed to support and enable new homes, the effect of contributions on the viability of residential development and the delivery of affordable housing should be closely examined and monitored over time. Boroughs are advised to ensure that their evidence authoritatively demonstrates that proposed CIL rates will not compromise the strategic objective to maximise delivery of overall and affordable housing provision.
- 5.2.8 Boroughs should ensure effective governance arrangements are put in place to manage and prioritise the allocation and investment of CIL funding to support and accelerate housing supply. Regularly updated IDPs can assist with this process.
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PART 6:

SOCIAL INFRASTRUCTURE

6.1 INTRODUCTION

- 6.1.1 This section provides guidance on London Plan policies on social infrastructure in relation to residential and mixed use development. It complements more detailed guidance provided in the Social Infrastructure SPG.
- 6.1.2 Accommodating the social infrastructure required to support housing growth and meet the needs of London's rapidly growing and changing population will require coordinated and effective partnership working between infrastructure providers, local authorities and developers.
- 6.1.3 Co-location of social infrastructure with new housing is desirable in meeting demand, as is the provision of new facilities which can be used by multiple service providers. Large-scale developments in opportunity and intensification areas, town centres and other large sites provide scope to coordinate and enable social infrastructure provision, either as part of mixed use development or by providing investment in new or expanded facilities nearby.

What does social infrastructure cover?

- 6.1.4 The London Plan defines social infrastructure broadly as covering a wide range of facilities, including health, nurseries, schools, colleges and universities, community, cultural, play and informal recreation facilities, sports and leisure facilities, places of worship, emergency facilities and other uses and activities which contribute to quality of life²³². This is not intended to be an exhaustive list and can be refined further at a local level.

Planning for social infrastructure provision

- 6.1.5 Policy 3.16 of the London Plan encourages boroughs to undertake regular social infrastructure need assessments at local and sub-regional levels. These should identify areas where existing infrastructure is deficient, unsuitable or redundant and highlight where the quantity, quality or accessibility of facilities needs to be enhanced to address existing or future needs. Planning for social infrastructure should be undertaken in an iterative manner alongside the preparation of Local Plans to ensure that housing capacity and delivery assumptions and the likely social infrastructure requirements are effectively modelled and considered.
- 6.1.6 Policy 3.16 provides strong protection for existing facilities where there is a defined local need and provides strong support for new or expanded facilities. Proposals which would result in a loss of social infrastructure for which there is a defined need should only be permitted where there is a realistic programme to secure the re-provision of facilities elsewhere. Where new social infrastructure is proposed, multiple-use facilities are encouraged wherever possible. This general approach to existing and new facilities is also followed in Policies 3.17-3.19, which cover health and social care, education and sports facilities.

²³² Mayor of London, London Plan, 2015, GLA, para 3.86 and glossary

6.1.7 The London Plan encourages boroughs to secure sites for the provision or reorganisation of infrastructure provision to meet identified requirements (Policies 3.16Db, 3.17Eb, 3.18Hb). Boroughs should develop policies on social infrastructure provision in new development, taking into account:

- the need, where possible, to accommodate social infrastructure and housing on the same site, through mixed use development;
- the potential to co-locate different forms of social infrastructure within the same facility, especially where there is good accessibility and synergies between different forms of provision (eg. schools and childcare facilities; or GP surgeries and pharmacies);
- site specific viability and deliverability considerations;
- the requirements of infrastructure delivery agencies; and
- the need to provide accessible facilities for all sections of the community.

Large sites

6.1.8 Policy 3.7 of the Plan recognises the vital role large sites have in meeting London's housing need and coordinating the provision of new social infrastructure. It emphasises the potential for a plan-led approach to enable increased residential densities. This approach to optimising housing provision is critical to address housing need and will also help develop the critical mass necessary to support the on-site delivery of new social infrastructure. Boroughs should positively explore opportunities to optimise housing capacity and facilitate infrastructure provision, working closely with developers and infrastructure delivery agencies. Guidance is provided in Section 1.3 on densities and social infrastructure provision.

Accessibility

6.1.9 The layout and design of development and social infrastructure facilities should be guided by principles of inclusive design and should be accessible and inclusive to all sections of the community, including disabled and older people and families with young children (Policy 7.2). Social infrastructure facilities should be easy to access by different modes of transport including walking, cycling and public transport (Policies 3.16C, 7.2). A broad picture of the spatial connectivity of facilities is provided by TfL's transport connectivity assessment guidebook²³³. For large sites, catchment analysis should be undertaken to illustrate the existing and planned social infrastructure provision in a location within different travel times.

Lifetime neighbourhoods

6.1.10 Accessible social infrastructure provision is a key principle of the London Plan's aim to deliver Lifetime Neighbourhoods (Policy 7.1). This requires development to ensure that people at all stages of their lives can get around easily; have access

²³³ Transport for London. Assessing transport connectivity in London. 2015

to infrastructure and services; and belong to a cohesive and diverse community. On a neighbourhood basis, large new developments should contribute to creating a well-connected and walkable layout, providing opportunities for all members of the community to engage in healthy lifestyles and social interaction. Further guidance on implementing the principles of lifetime neighbourhoods is provided in the Social Infrastructure SPG.

6.2 HOUSING AND EDUCATION FACILITIES

- 6.2.1 Research shows that London's school age population grew at a rate of 8.2% between 2001 and 2011 – much higher than national trends²³⁴. Forecasts show the number of pupils in London is expected to increase substantially by 2017/18, generating a need to accommodate around 194,000 additional pupils²³⁵. Particularly high increases are expected in certain boroughs. As population growth moves through the school system there will be growing pressures on secondary schools. The London Infrastructure Plan 2050 highlights that meeting the needs of an increasing school age population will require capital expenditure of around £600 million a year²³⁶.
- 6.2.2 Boroughs should promote a good supply and choice of quality school places, in line with their statutory duties²³⁷. This is particularly important in areas of current or forecast shortages and in parts of London with poor educational performance.
- 6.2.3 Proposals for new schools, including free schools and academies, should be considered positively and only refused where demonstrable negative local impacts substantially outweigh the desirability of providing new school places and where these impacts cannot be addressed through conditions or obligations (Policy 3.18D).
- 6.2.4 Proposals which co-locate schools and housing should be positively encouraged (Policy 3.18G), as should proposals which enable the use of educational facilities for community or recreational use outside school hours (Policy 3.18E). Provision of sufficient childcare facilities will also be important to address increasing birth rates in certain areas and enable mobility within the labour market.

6.3 HOUSING AND HEALTH

- 6.3.1 Population projections indicate the number of Londoners aged over 65 is expected to increase, with especially large increases expected in those over 90²³⁸. To address these challenges, the delivery of healthcare is expected to change in order to bring service provision closer to people's homes and reduce

²³⁴ London Councils, Do the Maths 2014 – London school places challenge

²³⁵ London Councils, Do the Maths 2014 – London school places challenge, page 4

²³⁶ Mayor of London, London Infrastructure Plan 2050, GLA, 2014, page 70

²³⁷ Section 14 of the Education Act 1996 and Section 2 of the Education and Inspections Act 2006

²³⁸ GLA Intelligence, GLA 2013 round of trend based population projections, 2014, GLA, page 8

growing pressures on hospital departments. Large scale mixed use development can facilitate the coordination and redesign of healthcare services, helping to place these within a more accessible community setting. Mixed use development in town centres and other accessible large sites will provide scope to deliver new facilities to address existing or forecast demand. Boroughs should work closely with health care providers to identify local healthcare issues and future infrastructure requirements, drawing on findings of Joint Strategic Needs Assessments (Policy 3.17).

- 6.3.2 Primary care services are typically provided by independent private contractors (eg. GPs, dentists, pharmacists). Consequently, the location, design and delivery of new facilities will need to provide commercially viable opportunities for practices in order to ensure premises are actually let and occupied. This will require close collaboration between public and private sector partners and careful consideration of the phasing and timing of new practices. Temporary uses can be provided where units are not initially viable for occupation by healthcare providers, with units occupied by surgeries at a later date as large developments are built out over time. This principle can also apply to other forms of social infrastructure provision.

Improving health outcomes

- 6.3.3 The quality of new housing in all tenures plays a key role in influencing the health and well-being of future residents. Housing standards set out in Part 2 of this SPG are especially important to achieving the objectives of Policy 3.2 of the London Plan, in particular those on internal space provision; dual aspect; air quality; daylight and sunlight; private open space; ceiling heights; overheating; noise; privacy; accessibility and adaptability. Providing a range of affordable and suitably sized properties in a range of tenures is also important to address overcrowding in the existing housing stock. Well-designed public and communal open spaces, parks, play spaces and urban greening within new large developments can provide benefits in terms of quality of life, physical and mental health and wellbeing.
- 6.3.4 New development should be designed and managed in ways that improves health, promotes healthy lifestyles and helps to reduce health inequalities (Policy 3.2D). Opportunities to deliver new or enhanced walking and cycling routes within new residential and mixed use development should be realised in order to facilitate more active lifestyles and improve local walking and cycling connectivity. Cycle parking facilities within new developments are critical to encouraging and enabling modal shift. Where possible, development should enhance pedestrian and cycle routes to transport nodes and town centre facilities.
- 6.3.5 Health Impact Assessments (HIA) can be used to consider health and wellbeing issues when planning large-scale development (Policy 3.2C). The Social Infrastructure SPG outlines a range of toolkits and guidance which can assist developers and planners consider these factors.
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PART 7:

MIXED USE AND LARGE DEVELOPMENTS

7.1 INTRODUCTION

- 7.1.1 This part of the SPG sets out the London Plan's strategic approach to encourage mixed use development. It provides guidance on implementing London Plan Policy 4.3 – Mixed use development and offices. In addition, guidance is provided on the London Plan's approach to particular locations expected to provide substantial housing capacity and considered suitable for higher density, mixed use, residential-led development. This includes town centres, opportunity areas, large sites and housing zones. Guidance is also provided on the management and release of surplus office and industrial land/sites for mixed use redevelopment and housing delivery.
- 7.1.2 The London Plan promotes a mix of land uses to make the most efficient and sustainable use of London's constrained capacity for development. Promoting mixed use development is a core planning principle of the NPPF.²³⁹ Mixed use development provides a way in which different uses can be accommodated on the same site or neighbourhood, helping to reduce the need to travel; optimise the use of scarce land available for new development; and make the best use of infrastructure capacity. The London Plan recognises that a number of the benefits of mixed use development can be achieved by ensuring an appropriate mix of uses across an area, as well as through mixed use buildings.²⁴⁰ A mix of land uses, including residential accommodation, can contribute to the London Plan's objective to create more accessible, inclusive, 'lifetime neighbourhoods.'
- 7.1.3 While encouraging mixed use development is an important strategic principle, its application in locations which may be marginal or unviable for commercial activity should be informed by realistic assessments of the viability of the commercial components of a scheme, taking into account location, anticipated footfall and likely demand. Blanket application of the mixed use principle without consideration of the requirements of commercial operators can lead to the provision of premises which may not be attractive to prospective tenants. Over provision of commercial ground floor units in inappropriate locations can undermine existing town centres and neighbourhood parades and may lead to sub-optimal provision of housing/affordable housing within a scheme. Ground floor residential units can be provided as an alternative to mixed land uses to maximise active frontages within a scheme (Standard 10).

7.2 HOUSING AND MIXED USE DEVELOPMENT IN CENTRAL LONDON

- 7.2.1 The London Plan provides a focused approach to securing mixed use development and housing within the CAZ and the north of the Isle of Dogs Opportunity Area²⁴¹. Within these locations increases in office floorspace (or those above a justified local threshold) should provide a mix of uses, including

²³⁹ CLG. National Planning Policy Framework (NPPF). CLG, 2012 para 17, bullet point 9

²⁴⁰ Mayor of London, London Plan 2015, para 4.15 and 4.17

²⁴¹ Mayor of London, London Plan, 2015, GLA, Policy 4.3Aa and 2.11Aa

housing, unless this would demonstrably conflict with other policies of the Plan (Policy 4.3). The CAZ SPG provides guidance on setting local thresholds including what default threshold should be used in the absence of an adopted local policy²⁴².

- 7.2.2 Whilst high office values in some central areas provide scope to support a mix of uses and contribute towards meeting London's housing need, increasing residential values within the CAZ can lead to pressures on existing office floorspace. Cumulatively, the loss of office stock within the CAZ to residential development has the potential to undermine the strategic function of the CAZ and its offer as a competitive national and global business location.
- 7.2.3 Substantial long-term growth is predicted in demand for office-based employment within the CAZ and the north of the Isle of Dogs²⁴³. It is vital that this growth is accommodated both in terms of job creation and to ensure these central areas remain globally competitive. Proposals for new office floorspace often compete with increasingly high value residential developments for scarce sites in central areas.
- 7.2.4 Sensitive application of the London Plan's mixed use development and office policy is therefore essential in order to ensure central London's office market and employment offer continues to be sustained and developed. Further detailed guidance on the implementation of this policy approach is provided in the CAZ SPG.

Delivering mixed uses and housing on-site or nearby through Policy 4.3Aa

- 7.2.5 As a general principle, where housing and other mixed uses are required under Policy 4.3Aa, these should normally be provided either on-site or nearby in order to create mixed use neighbourhoods, unless this would compromise other policies in the Plan. Whilst the London Plan does not define 'nearby' for the purposes of applying mixed use policies, this should be set locally and guided by the particular characteristics of a site or neighbourhood, which will vary considerably from scheme to scheme.
- 7.2.6 The Plan recognises the need for sufficient flexibility in applying requirements for housing or mixed uses on-site or nearby a development in order to take account of other strategic and local policy objectives (eg. affordable housing provision and offices), alongside particular local circumstances, site constraints and management considerations. This flexibility can be supported by the use of land use 'swaps' and 'credits.'

Land use 'swaps' and 'credits'

- 7.2.7 A land use '**swap**' is where a developer provides an off-site residential development to satisfy the housing requirement generated by a specified

²⁴² Mayor of London, Central Activities Zone SPG, 2016, Section 1.4

²⁴³ Mayor of London, London Plan, 2015, GLA, Table 4.1

office/commercial development. The planning applications for the two sites are considered at the same time by the planning authority and are linked by Section 106 agreement or planning condition.

- 7.2.8 A land use '**credit**' is where new off-site residential provision is provided in advance by a developer on the basis that it could be drawn down to satisfy the residential requirements of mixed use policies generated by future commercial development. An '**affordable housing credit**' is where new affordable housing is created where it is not a policy requirement. This affordable housing credit could potentially then be drawn down either for the purposes of affordable housing policy requirements and/or for the purposes of mixed use policy requirements.²⁴⁴
- 7.2.9 Policy 4.3Bb requires boroughs to develop local approaches to mixed use development and office provision, taking into account the contribution that land use swaps, housing credits and off-site contributions can make, particularly to sustain important clusters of commercial activities in the City and north of the Isle of Dogs. The Plan recognises there may be circumstances where a greater quantity or quality of housing provision (especially affordable housing and affordable family housing) can be secured in locations beyond the confines of a development proposal and its nearby area and may consequently achieve better overall planning outcomes²⁴⁵.
- 7.2.10 In relation to the CAZ, the London Plan suggests mixed use policies should be applied flexibly on a local basis so as not to compromise its strategic functions²⁴⁶. The Plan suggests swaps or credits may be used within and beyond the CAZ²⁴⁷. It supports the coordinated application of mixed use policies across local authority boundaries where this would support the broader objectives of the Plan²⁴⁸. When requiring the provision of mixed uses or housing from new office development through Policy 4.3, it is important to consider other strategic economic objectives set out in the London Plan²⁴⁹.

Negotiating affordable housing provision through Policy 4.3

- 7.2.11 As set out above, increases in office floorspace (or above a local threshold) within the CAZ and the north of the Isle of Dogs Opportunity Area, should provide a mix of uses, including housing, unless this would demonstrably conflict with other policies of the Plan (Policy 4.3Aa). Residential units proposed either on or off-site to address the requirements of Policy 4.3Aa will be subject to London Plan and Local Plan policies on affordable housing. The maximum reasonable amount of

²⁴⁴ Mayor of London, London Plan 2015, glossary page 393-394

²⁴⁵ London Plan 2015, paragraph 3.74, final bullet

²⁴⁶ Mayor of London, London Plan 2015, paragraph 2.45

²⁴⁷ Mayor of London, London Plan 2015, paragraph 2.45

²⁴⁸ Mayor of London, London Plan, 2015, para 4.15

²⁴⁹ See Mayor of London, London Plan, 2015, Policy 2.10Ae; Policy 2.10Ac; Policy 4.2Ab; Policy 2.11Ag; Policy 4.10Af

affordable housing should be sought from residential and mixed use schemes, taking account of the criteria set out in Policy 3.12 of the Plan.

- 7.2.12 Policy 3.12C of the London Plan states affordable housing provision should normally be provided on-site. This principle should be applied to affordable housing provision secured through Policy 4.3 of the London Plan, where on-site affordable housing provision is secured.
- 7.2.13 Cash in-lieu payments for off-site affordable housing should only be accepted where there would be demonstrable benefits in terms of furthering affordable housing provision and other policies in the London Plan. They should be accepted only where neither: a) on-site provision through a mixed use development; nor b) on-site provision as part of a land use swap or credit is appropriate. Where off-site financial contributions are considered appropriate, this should be secured as part of a planning agreement and the maximum reasonable amount of funding for affordable housing should be sought based on a viability appraisal. Contributions should be ring-fenced and, if appropriate, pooled to secure additional affordable housing provision, either on identified sites elsewhere or as part of an agreed programme for provision of affordable housing.
- 7.2.14 Requirements placed on office developments through Policy 4.3 should be informed by viability appraisals to ensure that the scale of requirements for housing, affordable housing and other mixed uses does not threaten the ability for strategic office development to be viably developed, as specified by national policy and guidance²⁵⁰. Where a land use swap is being considered, it is important to consider the viability of the two schemes collectively, as this may affect the maximum reasonable amount of affordable housing delivery which should be sought.

7.3 HOUSING AND MIXED USE DEVELOPMENT BEYOND CENTRAL LONDON

- 7.3.1 Mixed use policies in the London Plan are applied with a different land use and spatial emphasis beyond the CAZ and the north of the Isle of Dogs Opportunity Area. The Plan recognises the role of mixed use development in promoting the planned renewal and redevelopment of surplus office stock beyond central London, particularly that involving higher density, residential-led, mixed use redevelopment. Whilst strategic office development in central London and the north of the Isle of Dogs Opportunity Area has the potential to support housing delivery and create mixed use neighbourhoods, beyond central London the land values associated with residential and other commercial land uses are more likely to drive mixed use development and may provide scope to enable new office provision, where viable.
- 7.3.2 The London Plan sets out a broad spatial objective for mixed use development to support the consolidation and enhancement of overall office provision in the

²⁵⁰ DCLG, NPPF, paragraph 173 and relevant sections of the PPG on viability.

most competitive locations (Policies 4.3Ab and 2.7Ag). These are identified in paragraph 4.12 of the Plan and are informed by the findings of the Outer London Commission and London Office Review Panel²⁵¹. Residential development will be appropriate in a number of the competitive locations identified in paragraph 4.12 of the Plan, especially in town centres, transport nodes and high streets. Residential accommodation may not be appropriate in business or science park locations, given the employment focus of these areas.

Housing in Strategic Outer London Development Centres

7.3.3 To foster economic growth beyond central London the Plan also proposes 'Strategic Outer London Development Centres' (SOLDCs – Policy 2.16). These are business locations of different types which have distinct strengths of greater than sub regional importance which can be enhanced without significantly undermining the roles of other locations (the offer of which is usually of no more than sub regional importance). As a general principle, this will require specialist rather than mixed use development. However, in some circumstances (such as supporting new office provision), mixed use development including housing can play an enabling role. The Mayor will work with boroughs, the Outer London Commission and other stakeholders to identify other potential SOLDC and to explore whether and how mixed use development including housing can help realise their potential. Further guidance is provided on SOLDCs within the Town Centres SPG, including implementation guidelines for specific locations.²⁵²

Housing and offices beyond central London

7.3.4 Boroughs should seek to closely align the findings of their employment land and office floorspace reviews with their understanding of housing capacity, drawing on the SHLAA database. This coordinated approach is required by London Plan²⁵³ and is suggested by the NPPF²⁵⁴ and national planning guidance²⁵⁵. A careful balance should be struck between enabling comprehensive redevelopment of surplus office floorspace and sustaining viable employment provision. Office floorspace plays an important role in defining a town centre's economic function, as well as providing local employment opportunities and generating footfall to sustain local shops, services, restaurants and cafes. Higher density, residential-led, mixed use redevelopment can also deliver and support a wide range of town centre uses. Local approaches to manage office capacity and enable housing intensification on surplus office sites should be integrated into wider town centre strategies, drawing on guidance provided in the Town Centres SPG²⁵⁶.

²⁵¹ Worth putting in the references?

²⁵² Mayor of London, Town Centres SPG, 2014, Appendix E

²⁵³ Mayor of London, London Plan, 2015, GLA, policies 2.15, 3.3, 4.2 and 4.3

²⁵⁴ DCLG, NPPF, paragraph 22

²⁵⁵ DCLG, Planning Practice Guidance – Housing and economic development needs assessments; and Housing and economic land availability assessments

²⁵⁶ Mayor of London, Town Centres SPG, Section 1.3, 1.4, Chapter 2 and Chapter 6

- 7.3.5 A broader than local perspective should be taken when analysing office markets beyond central London in terms of supply and demand. Demand estimates for net office floorspace provision for inner and outer London to 2031 are provided in Table 4.1 of the London Plan. Office guidelines are provided in Annex 2 of the London Plan for town centres, which establish broad categories of future growth potential, based on the 2012 London Office Policy Review. Office locations outside town centres should be considered when undertaking demand assessments, as should trends in the overall office market beyond central London, where appropriate.
- 7.3.6 The supply and demand for workspaces suitable for small and medium sized enterprises should be explored by boroughs on a sub-regional or local basis, including the provision of incubator, accelerator and co-working spaces (IACs). The important role these premises play for start-up and small businesses²⁵⁷ and in terms of London Plan Policies 4.10, 2.7 and 2.15 should be recognised²⁵⁸.

Office to residential permitted development rights

- 7.3.7 Office to residential permitted development rights (PDR) were introduced in May 2013, with exemptions in place in the Central Activities Zone, north of Isle of Dogs, Tech City, the Royal Borough of Kensington & Chelsea and the Royal Docks Enterprise Zone. In October 2015 the Government made PDR permanent. Current exemptions will cease at the end of May 2019 and will need to be replaced with Article 4 Directions which are prepared by local planning authorities and subject to Secretary of State approval.
- 7.3.8 The Mayor is providing strategic support for a co-ordinated approach to the introduction of Article 4 Directions by the relevant boroughs to ensure that London's currently exempted locations continue to be safeguarded. Selected, geographically specific and targeted areas beyond the above locations should only be included in Article 4 Directions where these can be justified by local evidence²⁰.
- 7.3.9 Change of use from office to residential floorspace under permitted development rights can lead to sub-optimal planning outcomes when compared with the comprehensive, planned redevelopment of surplus sites in terms of overall housing output²⁵⁹, affordable housing provision and design quality. It may also fossilise aged and unattractive buildings in important townscape areas and at the same time potentially hinder land assembly and more comprehensive and higher density forms of redevelopment. With this in mind, boroughs beyond the exempted areas may wish to provide positive and proactive support to identify and enable the comprehensive redevelopment of surplus and vacant office

²⁵⁷ URS and London Enterprise Panel, Supporting Places of Work: Incubators, Accelerators and Co-working Spaces. 2014

²⁵⁸ Mayor of London, Accommodating Growth in Town Centres, Chapter 4

²⁵⁹ The London Office Policy Review 2012, page 131, Table 8.2

stock, as contrasted with its conversion to residential use through permitted development rights.

Planning obligations for affordable business space

7.3.10 Housing-led mixed use redevelopment should support the regeneration of town centres and high streets, providing opportunities for inward investment and the provision of modern and more appropriately sized premises suitable for a wider range of small and medium sized firms. Local policies to secure affordable or subsidised business floorspace through mixed use redevelopment should be informed by robust evidence of local and strategic demand for business floorspace and the economic viability of an individual scheme. When seeking planning obligations to support employment or office uses, boroughs should recognise the strategic importance the Mayor has placed on securing affordable housing and public transport improvements through planning obligations (Policy 8.2).

7.4 ACCOMMODATING GROWTH IN TOWN CENTRES

7.4.1 There are over 1,200 town centres of different sizes in London, including 1,000 neighbourhood and local centres. As town centres are some of the most accessible locations in London, higher density housing provision in these areas will play a key role in addressing London's requirement for additional housing capacity (Policy 3.3). London Plan Policy 2.15Dc requires boroughs to proactively manage the changing roles of centres, especially those with surplus retail and office floorspace. Boroughs should consider the scope to consolidate and strengthen centres by promoting their diversification, especially through high density, residential led, mixed use redevelopment.

Housing intensification in town centres

7.4.2 Housing intensification within town centres should reflect the Plan's emphasis for mixed use development in these locations. It should support wider measures to revitalise high streets in London, helping to sustain their role as important community hubs with their own distinct local character and ensure their resilience in the face of long-term structural challenges. Spatial variations are expected in terms of the impact of these changes on demand for retail floorspace depending on the size of centres, which are described in the Plan²⁶⁰.

7.4.3 High quality, locally sensitive design is essential to deliver successful higher density mixed use redevelopment in town centres. Residential-led mixed use redevelopment can have a number of positive impacts on town centre footfall, vitality and viability and can help to create a more attractive, safe and accessible environment, particularly in the evening. Redevelopment can enable the replacement of outmoded commercial floor plates with more flexible and appropriately sized ground floor units that are better suited to the requirements of

²⁶⁰ Mayor of London, London Plan, 2015, GLA, paragraph 2.27D

modern occupiers. This can facilitate the provision of a wider mix of daytime and evening uses and help support small and medium sized enterprises. Increasing population densities in and around centres can increase street activity and help sustain local shops, services and evening uses. Residential accommodation above ground floor units can also positively enhance the character of centres, helping to improve perceptions of personal safety after dark.

- 7.4.4 Higher density residential development also has the potential to augment the viability of commercial and mixed use development. Where small retail units are viable, there may be scope for boroughs to support the provision of small units suitable for small or independent retailers – an objective of London Plan Policy 4.9. In seeking contributions from large developments through planning obligations, boroughs should have regard to the strategic approach and Mayoral priorities for planning obligations outlined in Policy 8.2 the London Plan. The potential for comprehensive redevelopment to support the delivery of public realm improvements social infrastructure facilities should be explored by boroughs, working closely with infrastructure providers.

Proactive town centre strategies

- 7.4.5 Policy 2.15 and the Town Centres SPG encourages the preparation of proactive strategies for centres, based on a clear vision for their future development. This recognises the diversity of town centres across London, variations in the challenges they face and that there can be no 'one size fits all' solution. The Town Centres SPG and the Mayor's Accommodating Growth Report outline a range of potential investment and delivery mechanisms to enable town centre redevelopment and address fragmented land ownership, which should be drawn on by boroughs. Realising the development potential in these locations may require proactive approaches to land assembly and, if necessary, the use of compulsory purchase powers, in line with Policy 2.15Dc of the London Plan. A focused approach to bringing forward publically owned land will be necessary, working closely with other public and private sector partners (Policy 3.15). Where possible, strategies should identify potential opportunities for housing intensification and highlight particular land ownership, land assembly or delivery challenges and opportunities.

Identifying opportunities for housing intensification in town centres

- 7.4.6 Opportunities for housing intensification in town centres will be provided where there is surplus retail and office floorspace. The planned release of surplus industrial capacity within or on the edge of town centres will also provide scope for housing intensification. The release of surplus industrial land should be focused on surplus sites with good public transport accessibility in order to enable higher residential densities to be achieved²⁶¹. This will include land adjacent to town centres.

²⁶¹ Mayor of London, London Plan, 2015, paragraph 2.85

- 7.4.7 Low density retail or other commercial buildings and associated surface car parking areas may provide opportunities for intensification, for example by rationalising existing floorspace and parking areas and providing residential accommodation on upper floors through mixed use redevelopment. Stacking residential development above other activities can be applied to a range of existing town centre uses, including social infrastructure, transport facilities (eg bus garages and stations), leisure and civic facilities. Contraction in demand for retail floorspace and the consolidation of secondary or tertiary frontages may also enable opportunities for housing intensification on smaller sites on the fringes of town centres (Policy 2.15Dc2).
- 7.4.8 The potential for intensification and change in town centres should be fully explored by boroughs. Evidence of demand for office, industrial and retail floorspace should be aligned with an assessment of potential housing capacity, drawing on the SHLAA database. Local retail need assessments should take realistic account of changes in consumer behaviour and expenditure, including the impact of internet and multi-channel based forms of shopping (Policy 2.15Da1). Regular town centre health checks to monitor the vitality and viability of town centres should inform policy development²⁶². Evidence should be gathered on land ownership and lease arrangements, alongside other infrastructure, viability and delivery issues.

Accommodating growth in smaller households

- 7.4.9 Town centre housing at higher densities close to public transport facilities is especially suitable for one and two person households, particularly singles, couples and sharers, students and older people. Conversely, a lower proportion of family sized homes may be appropriate in town centres, as opportunities for play and other amenity spaces tend to be more constrained in these locations. Purpose built, professionally managed PRS accommodation is typically targeted at smaller (one and two person) households for whom living close to town centre and public transport facilities is generally appealing. This tenure of housing provision is therefore particularly suited to higher density development within or on the edge of town centres or transport nodes.
- 7.4.10 Boroughs should consider applying local policies on unit size mix flexibly in town centre and edge of centre sites where there is good accessibility, recognising the particular suitability of these locations for 1 and 2 bedroom units. Boroughs may also wish to take into account the potential net benefits which can arise as a result of the provision of smaller units in relation to the existing stock of family sized homes, including the extent to which the provision of smaller accessible and adaptable units may encourage downsizing, freeing up larger homes for occupation by families. Further guidance on housing mix is provided in Part 3 – Choice.

²⁶² As recommended by London Plan Policy 4.7Cb and the Town Centres SPG

7.4.11 The London Plan requires boroughs to encourage greater spatial dispersal in student housing provision away from central London where accommodation has been concentrated²⁶³. In enabling a more dispersed pattern of provision across London, boroughs should consider town centres as particularly suitable for student housing, alongside other locations with good public transport connectivity and access to high quality walking and cycling networks. The role higher density accommodation for students can play in supporting mixed use redevelopment and the regeneration and diversification of town centres should be positively considered, in particular the potential to increase daytime and evening activity and footfall within centres.

Optimising housing output

7.4.12 As the main nodes on London's public transport network, Metropolitan, Major and some District centres typically have higher 'PTAL' scores (5-6). Their potential to support more sustainable travel patterns and 'central' or 'urban' setting in terms of character means they can be capable of sustaining housing densities up to 405 units per hectare depending on dwelling size (London Plan policy 3.4). Boroughs are encouraged to promote higher densities in town centres, especially those with the good public transport connectivity or where there are plans to improve public transport provision (Policies 3.3, 6.1). In many instances major bus corridors beyond town centre boundaries also have high PTAL scores. Opportunities to optimise housing output should be fully realised along these routes, in line with Policies 3.3E, 3.4 and 6.1.

7.4.13 Residential densities in town centres may exceed the relevant density range in well justified circumstances, providing the range of qualitative concerns highlighted in chapter 2 have been suitably addressed. Particular sites within some town centres may be appropriate locations for tall or large buildings where there is good access to public transport and where their impact is justified through a detailed urban design analysis, taking into account the criteria set out in Policy 7.7. Optimising housing output means taking into account the range of design principles set out in chapter seven of the London Plan. This includes having regard to local character and heritage assets and securing high quality architecture and a good public realm (Policies 7.4 to 7.8).

7.5 OPPORTUNITY AREAS AND OTHER LARGE SITES

7.5.1 Opportunity areas are focused on the capital's major areas of brownfield land with substantial capacity to accommodate new homes, jobs and commercial development. The London Plan outlines the Mayor's expectation for these areas to make a particularly significant contribution towards meeting the capital's housing need.²⁶⁴ However, opportunity areas are not all about housing – up to 575,000 additional jobs are expected to be provided in these areas during the

²⁶³ Mayor of London, London Plan, GLA, 2015, paragraph 3.53A

²⁶⁴ Mayor of London, London Plan, 2015, GLA, para 2.61

same period, helping to significantly boost economic growth in the capital and deliver mixed use neighbourhoods. The London Plan Annual Monitoring Reports (AMRs) provide further information on the progress made in preparing planning frameworks for opportunity areas across London²⁶⁵.

- 7.5.2 Policies 2.13 and 3.3 of the London Plan identify opportunity areas as one of a number of specifically identified locations where there is potential for additional housing capacity to be brought forward beyond that identified in the SHLAA. Extra housing supply from opportunity areas will be essential to help close the gap between London's identified housing need (49,000 homes pa) and currently identified capacity (42,000 homes pa). This recognises that opportunity areas can typically accommodate higher residential densities and may be suitable locations for tall or large buildings, subject to detailed analysis in terms of the criteria set out in Policy 7.7.
- 7.5.3 Indicative guidelines for housing potential in opportunity areas are provided in Annex 1 of the London Plan should be considered as a minimum starting point, to be exceeded and accelerated where possible. Delivering high quality development on this scale will require particularly effective and integrated partnership working between public and private sector investors and delivery agencies, in line with Policies 3.15 and 2.13 of the London Plan. This should establish and enable the necessary physical, social and green infrastructure to support development, together with the phasing, funding and delivery requirements. Development and Infrastructure Funding (DIF) studies have been used in a number of opportunity areas for this purpose.
- 7.5.4 The London Plan highlights the critical role large sites are anticipated to play in meeting London's housing need and reducing the gap between local and strategic housing need and supply²⁶⁶. For the purposes of Policy 3.7, large sites are defined as those of more than 5ha in size or capable of accommodating more than 500 dwellings. Given their strategic importance to meeting housing need, Policy 3.7 requires all large sites to be progressed through a plan-led process to encourage higher densities. Considerable numbers of large sites will be located within opportunity areas.
- 7.5.5 The potential for increased densities should be positively explored and enabled on large sites and in opportunity areas. The London Plan highlights the scope for large sites to determine their own character in terms of residential densities²⁶⁷. Guidance in Part 1 of this SPG confirms that sites over two hectares typically have the potential to define their own setting in terms of the density ranges in Table 3.2 of the London Plan. Paragraph 3.43 of the London Plan highlights a number of planning and design considerations which should be taken into account when preparing plans or frameworks for large sites. As potential sources of substantial

²⁶⁵ Mayor of London, Annual Monitoring Report 11, chapter 3, page 112 to 114

²⁶⁶ Mayor of London, London Plan 2015, para 3.19

²⁶⁷ Mayor of London, London Plan 2015, para 2.62

amounts of additional housing, large sites and opportunity areas have the potential to generate the critical mass necessary to enable the delivery of social, physical and green infrastructure. The Plan underlines the importance for large sites to create attractive new urban neighbourhoods with distinctive identities and a good quality public realm and for sites to integrate with the surrounding street network in order to create well connected neighbourhoods.

- 7.5.6 The design of large residential and mixed use developments must encourage sustainable modes of transport, including walking, cycling and bus provision. Improved transport infrastructure is critical to reduce car use and make sustainable travel more convenient and efficient. Transport infrastructure should be considered at an early stage in the planning and design process, as it is not always possible to effectively address these requirements at a later stage. Depending on the size of a site, consideration should be given to providing prioritised or segregated bus and cycle routes in order to improve the attractiveness, safety and reliability of these modes of transport. Where new bus routes and bus stops are provided these should be well-connected to pedestrian routes to ensure good accessibility.

Optimising housing output

- 7.5.7 The size, scale and importance of large sites and opportunities areas in addressing London's housing need means that optimising housing potential in these locations is considered to be a strategic priority. The scale of development should be informed by the strategic context, recognising existing and planned transport accessibility and planned investment. The potential to deliver new homes and jobs to contribute to the London Plan's overall strategic housing and economic requirements should be an important consideration, alongside particular local circumstances.
- 7.5.8 Densities in opportunity areas and on other large sites may exceed the relevant density ranges in Table 3.2 of the London Plan, subject to development achieving the highest standards in terms of residential and environmental quality and proposals addressing the other qualitative concerns set out in Section 1.3 of the SPG. The extent to which this is possible will depend on anticipated infrastructure capacity, having regard to local character. The potential for higher levels of development to enable additional infrastructure capacity should be fully explored. Higher densities should be clearly and robustly justified through the plan-making or planning decision-making process. Flexibility within Policy 3.4 should be recognised, together with the Plan's emphasis that the density ranges should not be applied mechanistically.

7.6 HOUSING ZONES

- 7.6.1 Housing Zones are identified areas with substantial potential to unlock and accelerate housing delivery in London through targeted investment, engagement and planning. These areas will play an important role in ensuring current rates
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of housebuilding in London are doubled in order to address population growth. Across London, housing zones are expected to speed up the supply of around 50,000 homes across a range of tenures, including private sale, affordable homes for rent and shared ownership and long-term, purpose built private rented sector accommodation. Each housing zone is expected to have potential to deliver over 1,000 homes. However, a number of zones are identified as having much greater capacity for housing output, which could increase over time.

- 7.6.2 The Housing Zones programme is explicitly designed to encourage developers, boroughs and other key partners to consider innovative and flexible approaches to accelerate sustainable development and increase housing delivery. This may involve novel methods of funding provision, or tailoring housing investment and planning approaches to address particular local circumstances. Housing Zones will benefit from intensive partnership working between the GLA, boroughs and other public and private sector stakeholders, including landowners, developers, utility companies, and Transport for London and Network Rail. Focused and integrated collaboration will aim to address identified barriers holding back housing delivery and to fully optimise housing potential. This model of partnership working should not be limited to housing zones and is essential to enable large-scale housing potential in other areas of London (Policy 3.15).
- 7.6.3 All new development in Housing Zones will be expected to deliver successful place-making and secure residential and mixed use development of a high standard, particularly in relation to the housing standards in Part 2 of this SPG and the design principles set out in chapter 7 of the London Plan. The requirement to maximise affordable housing provision and ensure mixed and balanced communities will be equally important considerations (Policies 3.9 to 3.12). The allocation of funding to particular Housing Zones and the levels of housing and affordable housing delivery identified does not prejudice any future Mayoral decisions in relation to planning applications of potential strategic importance or land designations. All relevant strategic, local and national policies should be applied to development proposals in Housing Zones.
- 7.6.4 Designated Housing Zone boundaries are likely to cover large and diverse areas of London, capturing a number of different land uses and forms of development. This allows boroughs and the GLA to consider the holistic plan-led regeneration and transformation of the area, recognising London's critical need for both housing and employment. It will be important to take into account the rigorous approach to industrial land management (including retention and, where appropriate, mechanisms for release) set out in London Plan policies 2.17 and 4.4 and the Mayor's Land for Industry and Transport SPG. Where Housing Zones include areas of designated industrial land, it is not anticipated that these areas are to be redeveloped or re-designated, unless this is approved through the planning process and justified on the basis of robust evidence.
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- 7.6.5 A number of housing zones overlap with opportunity area and town centre boundaries in some boroughs, helping to speed up the realisation of housing capacity in locations the London Plan identifies as being suitable for significant redevelopment and higher density development. Whilst the primary focus will be on enabling residential development, Housing Zones are expected to support mixed use development and sustainable communities, including necessary social infrastructure provision and other supporting commercial and employment uses. This will be a particularly important consideration within town centres.
- 7.6.6 Boroughs may consider applying a fixed percentage affordable housing target for opportunity areas and housing zones. This can help provide certainty to developers and land owners about the affordable housing requirements and help prevent land price rises based on hope value. The percentage should be based on an understanding of the maximum reasonable amount of affordable housing based on the specifics of that area (including infrastructure and transport requirements). With the application of a fixed percentage, where an applicant meets the affordable housing target, there would be no requirement to assess if that is the maximum reasonable for that site (as it is accepted that it is the maximum reasonable for the area). However, if the applicant falls short of the affordable target, a viability appraisal would be used to assess maximum reasonable in the usual manner.
- 7.6.7 A similar area based approach is encouraged to stimulate investment in purpose built PRS to meet the distinct need for 'mid market' housing. This will also help accelerate delivery within these areas. Boroughs are encouraged to work proactively with investors, developers, land owners and the Mayor to bring forward such development, recognising its distinct economics and, where appropriate, design requirements. Generally, there is sufficient flexibility in the design standards to address these requirements.

7.7 HOUSING AND INDUSTRIAL SURPLUS LAND

- 7.7.1 Historically, surplus industrial land has been a key source of new housing capacity. However, industrial land is an increasingly scarce and finite resource in the capital. Pressure to accommodate London's growing housing requirements can raise strategic and local concerns about the continued long-term reduction in industrial capacity. To reflect this, the Plan adopts a rigorous, evidence-led approach to plan, monitor and manage the release of surplus industrial land for housing or mixed use development in line with national policy²⁶⁸ (London Plan - Policies 2.17 and 4.4).
- 7.7.2 London's manufacturing sector as a whole is projected to continue to contract. However, it is essential that the process of industrial land release is managed sensitively so that provision is made for other essential industrial functions, logistics, waste and transport facilities, emerging new sectors such as green

²⁶⁸ CLG NPPF 2012 *ibid* para 51

industries. A myriad of small and medium sized firms also rely on the planning system to protect suitable and affordable business space.

- 7.7.3 The London Plan states that industrial land use change should be monitored against a strategic pan-London benchmark of an average net release of 37 hectares between 2011–2031. This benchmark is informed by research and consultation undertaken through the Industry and Transport SPG²⁶⁹. At a more local level, Map 4.1 of the London Plan sets out borough level categories for transfer of industrial land to other uses. Annual industrial release benchmarks in hectares for individual boroughs for 2011-2031 are provided in Annex 1 of the Industry and Transport SPG.

Release of surplus industrial land

- 7.7.4 In line with the NPPF, London Plan policies state that where industrial land is surplus to requirements, it should be brought forward to address strategic and local objectives, particularly for housing. Industrial release should be undertaken on a selective and carefully managed and monitored basis to ensure genuine demand suitable occupiers, including transport, logistics and, in particular, waste is addressed. The main reservoir of industrial capacity in Strategic Industrial Locations (SILs) and, where formally designated, Locally Significant Industrial Sites (LSIS) will continue to be protected where appropriate. The Land for Industry and Transport SPG sets out a range of economic, land use and demand based criteria to inform management of the release or retention of designated industrial land and smaller sites which are not categorised as being SILs or 'Locally Significant'. There will be scope for plan-led and strategically coordinated consolidation and reconfiguration on SILs and LSISs to yield capacity for housing and mixed use development, especially in East London. Beyond East London, it is anticipated that most industrial land releases to housing should come from smaller industrial sites.
- 7.7.5 Where land is to be released from SILs and LSIS, this must be based on authoritative local and strategic evidence and should be managed and coordinated on a regular basis through the preparation or review of a local plans, area action plans or opportunity area planning frameworks, taking into account the plan, monitor and manage approach set out in the London Plan (Policy 4.4). Smaller scale releases from SILs should not compromise the integrity and viability of the remainder of the SIL (Policy 2.17 C). The same is true for small scale release of LSIS.
- 7.7.6 The process of managing industrial capacity should place a particular focus on bringing forward surplus sites in and around public transport nodes to enable the higher residential densities which can be achieved in these locations. Surplus industrial land within or on the edges of town centres should also be considered

²⁶⁹ Mayor of London. Supplementary Planning Guidance, Land for Industry and Transport. GLA,2012. Roger Tym & Partners, King Sturge

particularly suitable for higher density, residential led, mixed use redevelopment, considering its accessibility; proximity to facilities and services; and potential role in enabling town centre housing intensification, regeneration and renewal. In addition to housing, mixed use redevelopment of surplus sites can also provide scope to modernise and upgrade existing business floorspace and can, where appropriate, provide opportunities to accommodate small and medium sized companies.

ANNEX 1:

BOROUGH LEVEL INDICATIVE NEED BENCHMARKS, AFFORDABILITY RATIOS, LONDON PLAN TARGETS AND COMPLETIONS

BOROUGH	1. GLA HOUSEHOLD PROJECTIONS 2014 ROUND LONG TERM VARIANT (DECEMBER 2015) 2015-2036	2. GLA HOUSEHOLD PROJECTIONS 2014 ROUND SHORT TERM VARIANT (DECEMBER 2015) 2015-2036	3. DCLG 2012-BASED PROJECTED ANNUALISED HOUSEHOLD GROWTH	4. MODELLED LOCAL HOUSING NEED USING 2013 SHMA METHODOLOGY	5. RATIO OF LOWER QUARTILE HOUSE PRICES TO LOWER QUARTILE EARNINGS, 2013	6. LONDON PLAN MINIMUM TARGET	8. AVERAGE ANNUAL NET COMPLETIONS (2004-2013)
B & D	1037	1514	1,525	1,641	6.60	1236	505
Barnet	1928	2496	2,849	2,479	11.27	2349	994
Bexley	855	967	1,111	1,012	9.07	446	336
Brent	1454	1594	1,560	2,196	11.85	1525	846
Bromley	1535	1855	1,780	1,315	10.12	641	676
Camden	929	1277	1,286	1,042	13.61	889	716
City of London	95	105	86	57	13.44	141	116
Croydon	2011	2311	2,351	2,072	8.32	1435	942
Ealing	1728	1833	1,975	1,723	11.61	1297	912
Enfield	1627	1986	2,329	2,160	10.14	798	499
Greenwich	1541	1610	1,637	1,559	8.70	2685	1285
Hackney	1290	1728	1,793	1,789	11.70	1725	1449
H&F	749	671	484	246	14.78	1031	607
Haringey	1321	1763	1,931	1,365	11.15	1502	741
Harrow	1438	1447	1,421	1,349	12.71	593	513
Havering	1023	1220	1,336	1,181	8.04	1170	460
Hillingdon	1221	1703	1,795	1,644	8.52	559	931
Hounslow	1384	1761	1,874	1,660	10.07	822	930
Islington	689	1367	1,670	1,230	12.13	1264	1705
K&C	534	388	287	105	26.81	733	188
Kingston	532	825	1,057	745	12.66	643	320
Lambeth	1519	1759	1,811	1,479	10.24	1559	1113
Lewisham	1644	1920	2,100	1,628	8.41	1385	884
Merton	954	1123	1,264	1,084	11.70	411	518
Newham	1717	2331	2,199	2,745	9.24	3076	1140
Redbridge	1744	1951	2,125	1,981	10.87	1123	605
Richmond	887	1022	1,113	714	14.50	315	423
Southwark	1396	1799	2,056	1,642	9.72	2736	1501
Sutton	1071	1360	1,351	992	8.77	363	432
Tower Hamlets	1638	2426	2,707	2,529	7.91	4195	2291
Waltham Forest	1652	1765	1,673	1,744	10.74	862	531
Wandsworth	1503	1501	1,439	860	14.36	1812	1174
Westminster	1388	1666	1,261	915	18.11	1068	822
Inner London					10.00		
Outer London					9.79		
London total	42033	51043	53,235	46,885		42389	27106

Notes

Column 4-Modelled local housing need by GLA using local version of GLA 2013 SHMA methodology. Note that the borough need figures do not sum to the 2013 London SHMA total because some of the data used to derive the London figure is not available at the local authority level.

Column 5 – Definition of inner and outer London is based on DCLG's definition, which differs from that of the London Plan.

Column 8 -Conventional and non-conventional housing completions, including accommodation for students, older people, hostels and HMOs. Annual figures based on financial years 2004/5 to 2013/14.

Column 6 – For Hackney, Newham and Tower Hamlets the target includes relevant area of the LLDC and therefore differs from Table 3.1 of the London Plan.

MAYOR OF LONDON