



DRAFT INTERIM HOUSING SUPPLEMENTARY PLANNING GUIDANCE

MAY 2015

LONDON PLAN 2015
IMPLEMENTATION FRAMEWORK

MAYOR OF LONDON

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MAY 2015

How to give your views on the Draft Interim Housing Supplementary Planning Guidance

Public consultation on the Draft Interim Housing Supplementary Planning Guidance (SPG) is open for a period of 12 weeks, from 15 May 2015 until 7 August 2015.

You can also view this document online and download it from: <https://www.london.gov.uk>

Please respond in writing by email or post. Where possible, please reference your comments to the relevant part, paragraph or table in the SPG.

Written responses can be sent by post or email (see details below).

- By email - to housingspg@london.gov.uk (If you send in a response by email it is not necessary to also send us a hard copy.)
- **By post** (no stamp required) to:
Boris Johnson, Mayor of London
(Housing SPG)
FREEPOST LON15799
GLA City Hall, post point 18
The Queen's Walk
LONDON SE1 2AA

All responses (emails and letters) should be received by **midnight on Monday 7 August 2015**

Please note that all responses will be made available for public inspection.

Copies of this document are available from www.london.gov.uk

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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. By 2036 there are expected to be 1.5 million more Londoners, raising the capital's population to 10 million.

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.

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 new London Plan this draft SPG seeks to encourage 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 also need to ensure we have housing that meets people's needs throughout their lives. As Londoners continue to live longer, the amount of accommodation that is suitable for older people needs to be substantially increased. Housing provision will need to address growth in smaller households and 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, an already dense city, 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. This is why this draft SPG carries forward my housing design standards for London in the context of Government's new national housing standards.

A handwritten signature in black ink, appearing to read 'Boris Johnson'.

Boris Johnson
Mayor of London



INTRODUCTION

0.1.0 This draft Interim Supplementary Planning Guidance (SPG) provides guidance on the implementation of housing policies in the 2015 London Plan¹. It takes account of changes made through the Further Alterations to the London Plan. These sought to respond to substantial projected increases in London's population. To address anticipated household growth and backlog housing need, London will need to provide 49,000 new homes a year between 2015 and 2036².

0.1.1 The London Plan aims to meet London's housing requirements within the Greater London boundary by optimising housing capacity on London's brownfield sites, especially in locations with good public transport accessibility which are suitable for higher density development. It sets ambitious minimum housing provision targets which all boroughs should aim to achieve and exceed in order to meet local and strategic housing need. It outlines how additional housing capacity should be brought forwards in town centres, opportunity/intensification areas and on large sites and surplus industrial, commercial and public land.

0.1.2 However, increasing overall housing supply is only one part of the challenge: the Plan identifies the need for a wide choice of homes across different tenures, types and sizes in order to address the range of housing requirements that are found in the capital. It sets a minimum target of 17,000 new affordable homes a year and provides indicative

benchmarks on the amount of specialist accommodation needed each year for older people as well as highlighting the importance of meeting all London's housing needs. To support London's rapidly growing population, it is important that development is supported by necessary infrastructure provision and that efficient use is made of the existing housing stock in the capital.

0.1.3 Draft guidance in this SPG has been updated and revised to address these various issues and reflect updated London Plan policy and strategic evidence. The SPG has also been updated to reflect the proposed minor alterations to the London Plan which will align the London Plan with the new national technical standards. To ensure the SPG provides guidance on the most up to date London Plan, it will be published as Interim Guidance to be updated as necessary following the adoption of the minor alterations.

The structure of this document

0.1.4 The SPG is divided into seven parts:

- **Part 1 covers housing supply** - this provides new guidance to boroughs 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 capacity 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 minor alterations

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

² Mayor of London. The 2013 London Strategic Housing Market Assessment, GLA, 2014

to the Plan. Some amendments have also been made to 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 boroughs undertaking sub-regional and local housing need assessments. It is revised to reflect strategic evidence on housing need³ and address changes to Policy 3.8 in the 2015 London Plan in terms of specialist housing for older people, student and private rented accommodation.
- **Part 4 covers affordable housing** – this provides guidance on affordable housing policies in the London Plan and advises on implementing Government’s recent policy announcements, including the vacant building credit.
- **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 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 mixed use development and office policy and the management of industrial land.

³ Mayor of London, 2013 Strategic Housing Market Assessment (SHMA), GLA, 2014



OVERGROUND

DALSTON JUNCTION

Japanese Cuisine

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. The first section focuses on Policy 3.3 and the use of minimum targets in Table 3.1 of the London Plan (see table 1.1 of this SPG) 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.

POLICY 3.3 INCREASING HOUSING SUPPLY

Strategic

- A The Mayor recognises the pressing need for more homes in London in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford.
- B Working with relevant partners, the Mayor will seek to ensure the housing need identified in paragraphs 3.16a and 3.16b is met particularly through provision consistent with at least an annual average of 42,000 net

additional homes across London ⁴ which will enhance the environment, improve housing choice and affordability and provide better quality accommodation for Londoners.

- C This target will be reviewed by 2019/20 and periodically thereafter and provide the basis for monitoring until then.

LDF preparation

- D Boroughs should seek to achieve and exceed the relevant minimum borough annual average housing target in Table 3.1, if a target beyond 2025 is required, boroughs should roll forward and seek to exceed that in Table 3.1 until it is replaced by a revised London Plan target.
- Da Boroughs should draw on the housing benchmarks in table 3.1 in developing their LDF housing targets, augmented where possible with extra housing capacity to close the gap between identified housing need (see Policy 3.8) and supply in line with the requirement of the NPPF
- E Boroughs should identify and seek to enable additional development capacity to be brought forward to supplement these targets having regard to the other policies of this Plan and in particular the potential to realise brownfield housing capacity through the spatial structure it provides including:
 - a intensification (see policies 2.13, 3.4)

⁴ Net additional homes including additional dwellings provided by development and redevelopment, conversion of residential and non-residential property, long term vacant properties brought back into use and household spaces in non-self-contained accommodation.

- b town centre renewal, especially centres with good public transport accessibility (see Policy 2.15)
 - c opportunity and intensification areas and growth corridors (see policies 2.13 and 2.3)
 - d mixed use redevelopment, especially of surplus commercial capacity and surplus public land, and particularly that with good transport accessibility (see policies 2.7, 2.11, 4.2-4.4)
 - e sensitive renewal of existing residential areas, especially in areas of good public transport accessibility (see policies 3.4, 3.5, 3.14).
- F Boroughs must identify new, and review existing housing sites for inclusion in LDFs.
- G Boroughs should monitor housing capacity and provision against the average targets in Table 3.1, local housing needs assessments and the sensitivity ranges set out in the SHLAA report and updated in the London Plan Annual Monitoring Report.

1.1 THE STRATEGIC APPROACH TO HOUSING TARGETS

1.1.1 In 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 address London's objectively assessed need for 48,840 new homes a year⁵, 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 Assessment (SHLAA)⁶. 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).⁷

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 an equitable and locally sensitive framework to identify housing capacity. This approach reflects advice in the

⁵ Mayor of London, The 2013 London Strategic Housing Market Assessment

⁶ Mayor of London, The London Strategic Land Availability Assessment (SHLAA) 2013

⁷ DCLG, National Planning Policy Framework (NPPF), paragraph 47

National Planning Practice Guidance (NPPG)⁸ 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 minimum targets in the London Plan 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 assessment⁹, 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. 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).

⁸ National Planning Practice Guidance, Paragraph: 007 Reference ID: 3-007-20140306. Paragraph: 008 Reference ID: 3-008-20140306

⁹ Three Dragons, David Lock Associates and TradeRisks Ltd, 2013 GLA SHLAA Viability Assessment

Reconciling local and strategic housing need

1.1.4 Whilst the need for boroughs 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 meet need. This follows the emphasis of the NPPF to positively seek opportunities to meet housing need and secure sustainable development¹⁰.

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 supply (42,390 pa). On a pan-London basis this equates to a potential 'gap' of 6,450 new homes each year. At a local level, the SHLAA shows that a large number of boroughs (24 in total) are expected to exhibit shortfalls between identified housing capacity and DCLG household projections, with particularly acute issues of undersupply in outer London and the south London sub-region¹¹. Local and 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 on undertaking housing need assessments within the context of the pan London SHMA is provided in Part 3 of this SPG.

¹⁰ DCLG, NPPF, paragraph 14, 47

¹¹ Mayor of London, The London Strategic Land Availability Assessment (SHLAA) 2013, Table 3.19 and paras 3.81 to 3.84. Note that sub-regions are shown on Map 2.1 of the London Plan

Table 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
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

1.1.6 To address London’s strategic housing requirement and reconcile any local disparities between housing need and supply, Policy 3.3E requires boroughs to identify and proactively enable extra housing capacity through the preparation of their Local Plans. In addition to meeting the minimum targets in the London Plan, particular emphasis will be placed on:

- ensuring Local Plans seek to meet housing requirements identified in local and sub-regional need assessments; and
- in light of London’s strategic housing requirements, ensuring that all potential additional capacity is identified, 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 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. 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’¹². 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.¹³

1.1.8 In bringing forward additional capacity to exceed the minimum London Plan targets, boroughs should note the NPPF requirement for effective collaboration and joint working¹⁴ to address ‘strategic priorities’¹⁵ 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.

Enabling additional development capacity

1.1.9 When identifying additional housing capacity to supplement minimum targets, boroughs should carefully consider the particular importance the London Plan places on realising additional housing output through intensification (Policy 3.3Ea) and by optimising residential densities (Policy 3.4), especially where there is good existing or planned public transport accessibility. Following this principle, Policy 3.3E identifies the types of locations which are anticipated to provide a substantial increment to housing supply in London. These include town centres, opportunity

¹² DCLG, NPPF, paragraph 47

¹³ Judgement of the High Court of Justice, London Boroughs -v- Mayor of London & SSDCLG, Royal Courts of Justice, March 2014

¹⁴ DCLG, NPPF, paragraph 178 - 182

¹⁵ DCLG, NPPF, paragraph 156

areas, intensification areas, surplus industrial, commercial and public land and other large sites, especially those near transport nodes. These locations are identified because their size, character and accessibility typically means they have scope for higher density development towards the top, or in justified exceptional circumstances above the density ranges set out in the London Plan. The extent to which it is possible for these locations to provide additional housing output will need to be explored further at a local level by boroughs in preparing their Local Plans. Further housing capacity analysis should reflect the potential for large sites to define their own characteristics in terms of densities (Policy 3.7).

- 1.1.10 Policy 3.3 also stresses the importance of identifying and enabling the sensitive renewal and intensification of existing residential areas, especially in areas where there is good public transport accessibility. It identifies growth areas and coordination corridors of city region importance as having the potential to enable additional planned development capacity and address housing need in the wider metropolitan area (Policies 3.3Ec, 2.2 and 2.3). Further guidance on these and other sources of housing capacity is provided in Section 1.2.
- 1.1.11 In enabling additional capacity boroughs should consider the range of policies in the London Plan, together with the NPPF, not least the prerequisite for plans to be positively prepared, secure sustainable development and ‘boost significantly the supply of housing.’¹⁶ It should be recognised that the London

Plan’s approach to housing supply accords with core planning principles in the NPPF by prioritising the re-use of brownfield land and promoting the management of patterns of urban growth in order to maximise the use of sustainable modes of movement¹⁷.

- 1.1.12 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 of Local Plans, paragraph 3.19i sets an expectation for boroughs to work in partnership with public and private stakeholders to translate housing approvals into completions (Policy 3.15).
- 1.1.13 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 and should be supported by proportionate local evidence. This should comprise a

¹⁶ DCLG, NPPF, paragraph 47, 182

¹⁷ DCLG, NPPF, paragraph 17, bullets 8, 9 and 11

pro-active and targeted re-appraisal of a borough's SHLAA findings, drawing on scenario tests, supplemented by 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.

- 1.1.14 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 guidance¹⁸, 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 scenarios 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.
- 1.1.15 .Additional capacity derived from 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 locations¹⁹.

- 1.1.16 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 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 3.4²⁰. 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.
- 1.1.17 It should be recognised that higher densities do not always have to necessitate high rise development,

¹⁸ DCLG, NPPG, Paragraph: 017 Reference ID: 3-017-20140306

¹⁹ 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

²⁰ Mayor of London, London Plan, GLA, 2015, paragraph 3.28

particularly where a well-considered, design-led approach is taken making the most efficient use of land. Examples of residential schemes at various densities in different contexts are set out in the Outer London Commission's independent report on housing density²¹. 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).

1.1.18 Boroughs should also fully explore the extent to which constraints restricting housing potential 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 and existing commercial and leisure uses. For more details of assumptions in the SHLAA, see the 2013 SHLAA report²². Further guidance on accommodating growth in town centres is provided in Part 7 of this SPG.

1.1.19 Where additional housing capacity is identified and can be delivered during plan timescales the Mayor expects this extra capacity to be 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.

Rolling forward targets

1.1.20 Where a target beyond 2025 is required, boroughs should 'roll forward' and seek to exceed their annual average target in Table 3.1 of the Plan 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 uses²³. The principle of rolling forward targets has been accepted by three consecutive London Plan EiPs.

Borough housing trajectories

1.1.21 To comply with the NPPF²⁴ 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

²¹ Maccreanor Lavington Architects, Emily Reeves Architects, Graham Harrington. Housing Density Study. GLA, 2012

²² Mayor of London. Strategic Housing Land Availability Assessment 2013. GLA 2014

²³ London Plan Annual Monitoring Report 11 (2013-14), Table 2.1, p12

²⁴ DCLG, NPPF, paragraph 47

have a strong probability for housing development and should therefore be 'specifically identified' to reduce their dependence on windfall sites²⁵.

- 1.1.22 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. 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, where it does come forward for housing.

Windfall provision

- 1.1.23 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.

- 1.1.24 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 Plan²⁶.
- 1.1.25 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.²⁷
- 1.1.26 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'²⁸. It also suggests windfall allowance can be included in capacity assumptions for geographically defined 'broad locations' on the same evidential basis. With particular relevance

²⁵ Refer to DCLG, NPPF, Annex 2: Glossary – 'windfall sites'

²⁶ The Planning Inspectorate, Report to the Mayor of London by Mr A Thickett, 2014, page 10, para 36

²⁷ SHLAA, page 38

²⁸ DCLG, NPPG, Paragraph: 24 Reference ID: 3-24-20140306

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 15.²⁹

- 1.1.27 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 EiPs. Probability estimates are based on a site specific constraints testing exercise undertaken in partnership with boroughs.

Development viability

- 1.1.28 The SHLAA was designed³⁰ to address the national requirement to identify 'deliverable' and 'developable sites' or 'broad locations'³¹ to meet housing need on a pan-London basis. It is supported by an independent viability study³² which establishes 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 guidance³³ and advice provided by the Local Housing Delivery Group³⁴. Viability testing was based on development being policy compliant in terms of affordable housing contributions, CIL/s106, density and the Mayor's housing standards. Boroughs are advised to augment this evidence where appropriate with more detailed local assessments of viability.

Accelerating housing delivery

- 1.1.29 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 in gross terms, 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 year³⁵.

- 1.1.30 The Mayor's Barriers to Housing Delivery

²⁹ *ibid*

³⁰ Mayor of London, The London Strategic Land Availability Assessment 2013, paras 1.6-1.10

³¹ DCLG, NPPF, paragraph 47 and footnotes

³² Three Dragons, David Lock Associates and TradeRisks Ltd, 2013 GLA SHLAA Viability Assessment

³³ DCLG, NPPG, Paragraph: 005 Reference ID: 10-005-20140306, Paragraph: 006 Reference ID: 10-006-20140306

³⁴ Local Housing Delivery Group. Viability Testing Local Plans - advice for planning practitioners. chaired by Sir John Harman. 2012

³⁵ 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.

Report (2012)³⁶ suggested that the proportion of large sites owned by non-house builders has been a substantial delivery constraint in London. The 2014 update³⁷ 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 of identified large 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.

- 1.1.31 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 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.

Monitoring targets

- 1.1.32 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.
- 1.1.33 When monitoring housing supply against London Plan targets, boroughs should note that 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

³⁶ Mayor of London, Barriers to Housing Delivery: What are the market perceived barriers to residential development in London, 2012

³⁷ Mayor of London, Barriers to Housing Delivery Update: Private sector housing development on large sites in London, 2014

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 London³⁸. Outer London is likely to experience considerable population growth between 2015 and 2036. 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).

³⁸ 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.

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 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.

Sub regional Housing Provision

1.2.4 The SHLAA shows that there is particular housing potential in parts of east and central London. Overall, 62% of London's future provision between 2015 and 2025 is expected to come from these two sub regions. In east London alone, capacity has been identified in the SHLAA for approximately 180,000 new homes. This represents 42% of overall housing supply in London during this period³⁹. Capacity estimates in the SHLAA for central London also comprise 20% of London's total capacity. Translating this capacity into housing completions within a short-timescale will require a step change in terms of housing delivery and necessitate effective and focused partnership working and infrastructure delivery,

³⁹ Mayor of London, SHLAA 2013, refer to Table 3.15, page 77

particularly where a number of large sites are in close proximity. To illustrate the challenge, 47% of London's capacity from large sites (over 0.25ha) is located in east London⁴⁰.

- 1.2.5 Comparatively lower levels of housing capacity have been identified in the south, north and western sub-regions. Whilst housing capacity estimates for outer London boroughs are strongly influenced by public transport accessibility and the coverage of land designations, the potential to accommodate further housing intensification and identify extra sources of capacity in these areas should be rigorously re-evaluated, noting the importance of addressing local and strategic housing need.
- 1.2.6 Resonating with the NPPF's emphasis for housing supply to be 'needs driven,' a number of local proxies for local housing need were used during the development of the SHLAA and housing targets, including DCLG and GLA household projections⁴¹. This initial benchmarking of need and supply shows the south, west and north sub-regions are likely to exhibit particular shortfalls in terms of housing supply relative to household growth, with imbalances generally more pronounced in outer London boroughs. That said, within this broad pattern there are notable local exceptions at a borough level. Sub-regional or local need assessments undertaken in line with Policy 3.8 will provide a more detailed understanding of local housing

requirements and the extent of unmet housing need (see Part 3 – Choice). Annex 2 provides indicative borough level benchmarks for housing need drawing on DCLG and GLA household projections and the London SHMA.

Partnership working across London's boundaries

- 1.2.7 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.
- 1.2.8 To this end, the GLA has established a 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. Advice is also provided to local authorities outside London on their Local Plan preparation.

⁴⁰ Mayor of London, SHLAA 2013, refer to Table 3.2 and Table 3.15

⁴¹ Mayor of London, SHLAA 2013, refer to Table 3.19, pages 82-83

- 1.2.9 Looking at a much 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.
- 1.2.10 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 which boroughs in outer London should seek to work closely with neighbouring authorities, in line with the duty to cooperate.
- 1.2.11 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 within sub-market areas. 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. Given their role in delivering growth and infrastructure, it is important to engage Local Enterprise Partnerships.

Housing in Growth Areas and Coordination Corridors

- 1.2.12 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 Diagram⁴². This broad approach is underpinned by responsibilities under the GLA Act and by the Localism Act's Duty to Cooperate.
- 1.2.13 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.

Realising housing potential from major transport schemes

- 1.2.14 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

⁴² Mayor of London, London Plan, 2015, page 78

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.

- 1.2.15 Crossrail 1 and Crossrail 2, together with a range of other major transport proposals⁴³ and indicative schemes⁴⁴ 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 accessibility 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.
- 1.2.16 Where forthcoming infrastructure will significantly improve accessibility, the potential for housing intensification should be re-evaluated. Residential densities should be optimised in appropriate locations in light of future PTALs⁴⁵, subject to committed funding and/or robust delivery mechanisms being in place to secure improvements. 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.

- 1.2.17 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.

Opportunity Areas

- 1.2.18 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 London⁴⁶. Realising the capacity of some of these sites will pose particular challenges in terms of contamination, public transport

⁴³ Refer to Map 6.1 of the London Plan

⁴⁴ Refer to Table 6.1 of the London Plan

⁴⁵ Public Transport Accessibility Level

⁴⁶ Mayor of London, SHLAA, paragraph 3.31

accessibility, social infrastructure provision, environmental quality and financial viability. Focused partnership working will be required to bring forward their full potential.

- 1.2.19 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

- 1.2.20 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

- 1.2.21 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 Plan⁴⁷.
- 1.2.22 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, in line with Policies 3.3Ee, 3.4, 3.5 and 3.14.

Mixed use development in town centres

- 1.2.23 Due to their accessibility and character, London’s town centres have substantial potential for housing intensification, particularly through residential-led higher

⁴⁷ Mayor of London, London Plan, GLA, 2015, paragraph 2.58

density mixed use redevelopment. GLA research shows over 40,000 homes were completed within or on the edges of London's town centres between 2008–2013, with substantial numbers of units in the planning pipeline⁴⁸. Looking to the future, the SHLAA identifies capacity for over 85,000 new homes in town centre locations across London between 2015–2025⁴⁹. This equates to 20% of London's total housing capacity during this period. The Mayor's Accommodating Growth Report⁵⁰ 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.

- 1.2.24 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 Report⁵¹.

Surplus public sector land

- 1.2.25 Accelerating the disposal of surplus public sector land for housing is a national priority⁵² 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 that all of these sites are brought forwards for development by 2025. This will involve working closely with NHS trusts, boroughs, network rail and functional bodies such as Transport for London's (TfL) and the Metropolitan Police.

Surplus commercial and industrial land

- 1.2.26 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

⁴⁸ Mayor of London. 2013 London Town Centre Health Check Analysis Report. GLA, 2014, page 106

⁴⁹ Based on Town Centre boundaries as defined in Borough planning documents.

⁵⁰ Accommodating Growth in Town: Achieving successful Housing Intensification and High Street diversification, Mayor/GLA, 2014, pages viii-x, 97-106

⁵¹ Outer London Commission, Third Report, GLA, 2014

⁵² DCLG, Accelerating the release of public sector land, 2011

achieve⁵³.

- 1.2.27 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 requirements⁵⁴. 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

- 1.2.28 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 London⁵⁵. 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.

- 1.2.29 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).

- 1.2.30 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 forwards faster by small and medium sized house builders – could play just as important a role in accelerating delivery over the short to medium term.

Custom build

- 1.2.31 Boroughs are required under the London Plan to make appropriate provision for custom build housing, having regard to local need (Policy 3.8Bj and Part 3 para 3.1.77). 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 can also play an important role in increasing the number of small and medium-sized

⁵³ Refer to London Plan, paragraphs 2.85 and 4.23

⁵⁴ DCLG, NPPF, paragraph 18 to 22

⁵⁵ London Development Database, net completions on sites under 0.25ha for financial years 2005 - 2013

house builders entering the London housing market⁵⁶.

1.2.32 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.

1.2.33 Whether custom build housing can be successfully rolled out on 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 prospectus⁵⁷ 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. Government⁵⁸ and the Mayor⁵⁹ are keen to promote custom build on publicly owned land.

1.2.34 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).

Small infill development

1.2.35 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 example⁶⁰). 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

⁵⁶ Mayor of London, Homes for London. The London Housing Strategy, 2014, page 61

⁵⁷ Mayor of London. Build your own home – the London Way. Supporting Custom Build Housing and Community Right to Build, Funding Prospectus. GLA, 2012.

⁵⁸ DCLG, Right to build: Supporting custom and self-build, 2014.

⁵⁹ Mayor of London. Build your own home – the London Way. Supporting Custom Build Housing and Community Right to Build, Funding Prospectus. GLA, 2012

⁶⁰ Llewelyn Davies. Sustainable Residential Quality: new approaches to urban living. CON 66. LPAC, 1997

robust reasons to refuse development.

- 1.2.36 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 paragraph 1.3.44 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 study⁶¹ 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

- 1.2.37 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 London⁶². 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 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-conversions⁶³.

- 1.2.38 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-occupation⁶⁴. GLA projections show nearly 70% of household growth between 2011 and 2035 will be for households without children, including substantial growth in 1 and 2 person households⁶⁵. 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

⁶¹ Maccreanor Lavington Architects, Emily Reeves Architects, Graham Harrington. Housing Density Study. GLA, 2012.

⁶² 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

⁶³ The re-conversion or amalgamation of smaller private units into larger dwellings.

⁶⁴ Mayor of London, The 2013 London SHMA, GLA, 2014, refer to Table 1 and paragraph 0.21

⁶⁵ Mayor of London, The 2013 London SHMA, GLA, 2014, page 74, Table 11

lack of provision of new build flats in an area, growth in smaller households or increasing demand in the private rented sector.

1.2.39 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. 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.

1.2.40 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.

1.2.41 Paragraph 2.1.20 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’⁶⁶.

Housing from surplus offices

1.2.42 The London Plan encourages the planned redevelopment of surplus 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 units⁶⁷. 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 2013⁶⁸. This demonstrates that London had a successful and pragmatic

⁶⁶ 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’.

⁶⁷ The London Office Policy Review 2012, page 131, Table 8.2

⁶⁸ London Development Database, statistics for financial years 2006 to 2012

approach to enable the redevelopment and conversion of surplus office stock through the formal planning application process. Permitted development rights expire on 31 May 2016.

- 1.2.43 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 use⁶⁹. 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.
- 1.2.44 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.

Private garden land development

- 1.2.45 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. The SHLAA removed 90% of garden land development from windfall assumptions on small sites, in line with the NPPF⁷⁰.
- 1.2.46 Government has extended the scope of permitted development rights for extensions on dwelling houses on a temporary basis⁷¹. 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 set out below. 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 are 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.
- 1.2.47 Gardens can play a number of important roles in relation to London Plan Policies,

⁶⁹ The London Office Policy Review 2012, page 131, Table 8.2

⁷⁰ DCLG, NPPF, paragraph 48

⁷¹ The Town and Country Planning (General Permitted Development) (England) Order 2015, Part 1

particularly in terms of:

- defining local context and character including local social, physical, cultural, historical, environmental and economic characteristics (Policy 7.4, 3.5);
- providing safe, secure and sustainable environments and play spaces (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).

Basement extensions

1.2.48 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 outlined⁷².

Non self-contained accommodation

1.2.49 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 client groups (including special needs housing), and houses in multiple occupation. 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.

⁷² Mayor of London, Sustainable Design and Construction SPG, 2014, page 25-29

Student accommodation

1.2.50 Both the London Plan⁷³ and the NPPG⁷⁴ 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.⁷⁵

1.2.51 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.'⁷⁶ In addressing Policy 3.8Bh boroughs should consider:

- the strategic requirements for student housing identified in the London Plan⁷⁷ and any future GLA research, noting that this can change over time;
- 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 concentrated⁷⁸;

- 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 economy⁷⁹; and
- London's student housing pipeline⁸⁰.

1.2.52 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

⁷³ Mayor of London, London Plan, GLA, 2015, para 3.52

⁷⁴ Planning Practice Guidance, Paragraph: 038 Reference ID: 3-038-20140306

⁷⁵ LDD data for financial years 2004 to 2013

⁷⁶ Mayor of London, London Plan, GLA, 2015, footnote 86A

⁷⁷ Mayor of London, London Plan, GLA, 2015, paragraph 3.52

⁷⁸ Mayor of London, London Plan, GLA, 2015, para 3.53a, also refer to Mayor's Academic Forum Report, page 3

⁷⁹ Accommodating Growth in Town Centres: Achieving successful Housing Intensification and High Street diversification, Mayor/GLA, 2014, page 138

⁸⁰ 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.

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

- 1.2.53 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 (Policy 3.8), the indicative requirement benchmarks in Annex 5 of the London Plan and further guidance provided in Part 3 of this SPG. When assessing proposals, there should be consideration of the ‘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.
- 1.2.54 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 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 downsizers⁸¹. 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.

- 1.2.55 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).

Flats above shops

- 1.2.56 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 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

⁸¹ Accommodating Growth in Town Centres: Achieving successful Housing Intensification and High Street diversification, Mayor/GLA, 2014, page 205-206

of diversity, job creation and day time activity and spend.

Airspace developments over existing and new non-residential premises

- 1.2.57 Unused airspace above relatively low density commercial, leisure and infrastructure uses provides 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 resolved⁸². 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 outlets⁸³. Residential accommodation on upper floors should complement existing uses and activities, where these are continued as part of a redevelopment proposal. Account should be taken of commercial lender's perceptions of risk when considering the development viability of this form of redevelopment.

⁸² 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,

⁸³ London Residential Research. Developing additional housing above and on non-residential sites. DETR, 2002

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 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 use⁸⁴. The NPPG⁸⁵ states that empty homes returning to residential use can count towards meeting housing requirements,

⁸⁴ DCLG, NPPF, para 51

⁸⁵ DCLG, NPPG, Paragraph: 039 Reference ID: 3-039-20140306

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 Part 5 of this SPG - Stock and Investment.

Starter homes

1.2.60 In March 2015 the government introduced its Starter Home exemption site policy which aims to deliver starter homes at a minimum 20% discount on market values. Starter home exemption sites are envisaged as being sites that are in commercial or industrial use but are currently under-used or unviable. The policy states that where applications for Starter Homes come forward on such exemption sites, they should be approved unless the LPA can demonstrate overriding conflicts with the NPPF that cannot be mitigated. However, the guidance is clear that "Employment land which is being used productively or which is allocated and viable for employment purposes is not to be regarded as underused and unviable"⁸⁶. In London, any commercial or industrial land which is deemed surplus or unviable for that use, but is suitable for housing, either already has a planning permission or an allocation for housing or is identified as a potential housing site in the SHLAA and thus would not meet the criteria for an exemption site. Therefore, Starter Home schemes in London should only

be permitted where they represent additional housing capacity above what is already identified in the SHLAA and meet the Starter Home exemption site criteria.

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'⁸⁷.
- 1.3.2 Ensuring high density housing is sustainable and successful depends on a complex range of factors including

⁸⁶ DCLG Starter Homes exemption sites. Guidance March 2015

⁸⁷ Maccreanor 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.

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 characteristics⁸⁸. 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 land⁸⁹.

- 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 ago⁹⁰. 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 study⁹¹ 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.

- 1.3.4 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 consultants⁹² 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.”

⁸⁸ 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

⁸⁹ Maccreanor 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 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

⁹⁰ 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

⁹¹ Maccreanor Lavington et al 2012 *ibid*

⁹² Maccreanor Lavington et al 2012 *ibid*

1.3.5 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.

POLICY 3.4 OPTIMISING HOUSING POTENTIAL

Strategic, LDP preparation and Planning Decisions

- A Taking into account local context and character, the design principles in chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. Development proposals which compromise this policy should be resisted.

1.3.6 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 NPPF⁹³. Policy 3.4 and the SRQ matrix have been refined and tested at EIPs over a decade⁹⁴. 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 policy⁹⁵, 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

⁹³ DCLG NPPF 2012 *ibid* paras 47, 58

⁹⁴ 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

⁹⁵ DCLG NPPF 2012 *ibid* paras 6-9, 29-30

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'.

Applying the density matrix

- 1.3.7 Policy 3.4 and Table 3.3 are critical in assessing individual residential proposals but their inherent flexibility means that Table 3.3 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, 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 mechanically, without being qualified by consideration of other factors and planning policy requirements.
- 1.3.8 Development at densities outside these ranges will require particularly clear demonstration of exceptional circumstances (taking account of relevant London Plan policies and the considerations outlined in paragraphs 1.3.46 – 49). Exceptionally, higher or lower densities on individual developments may be acceptable where these can be clearly and robustly justified by local circumstances and where design is of an exemplary standard.
- 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 rigorously, proposals should normally be resisted (see para 1.3.46).
- 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 and has only limited value in assessing conversions. 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.

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 Depending on the particular local

Table 3.2 - Density matrix (habitable rooms and dwellings per hectare)

	SETTING	PUBLIC TRANSPORT ACCESSIBILITY LEVEL (PTAL)		
		0 TO 1	2 TO 3	4 TO 6
	Suburban	150 - 200 hr/ha	150 - 250 hr/ha	200 - 350 hr/ha
INDICATIVE AVERAGE DWELLINGS SIZE	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

circumstances, the provision of smaller units in suitable locations as part of higher density mixed use development can help relieve pressure to convert existing family sized properties into flats and may also enable downsizing, thus helping to potentially free-up under-occupied larger properties for large families. In areas with particularly high accessibility, consideration should be given to capitalising on this to make higher density provision for smaller households. Further guidance is provided on this issue in Part 7 of this SPG (para 7.4.9-11).

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).

1.3.18 Schemes should be designed to maximise tenure integration and affordable housing units should have the same external appearance as private housing⁹⁶. In some higher density schemes, separate provision of entrance and circulation spaces for different tenures may enable affordable housing provision which

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, hallways, utility rooms or

⁹⁶ Mayor of London, London Plan, 2015, para 3.76

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, Standard 4.4.1).

- 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. Further guidance on this is provided in paragraph 4.5.4 of this SPG.

- 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 accessibility (PTAL)

- 1.3.23 To help relate new development to public transport, the London Plan uses Public Transport Accessibility Level (PTAL) data supplied by Transport for London (TfL) to measure ease of access 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 accessibility levels can be achieved to justify the use of a higher density range. In assessing a site's capacity, a site-specific PTAL assessment should be carried out. TfL has also prepared indicative future PTAL maps for 2020-2036 as well as sub-regional capacity

and congestion maps. These should be taken into account when taking planning decisions on major sites⁹⁷. 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.

- 1.3.24 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.
- 1.3.25 The Plan recognises that while PTAL is a sound, strategic measure for assessing public transport accessibility 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. 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”. This latter point has been carried forward into the SPG Annex 3 options for more locally sensitive approaches to implementing parking policy in areas with low public transport accessibility. It should also be noted that low public transport accessibility is a key consideration for TfL in investment planning.

Viability and density

- 1.3.26 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).
- 1.3.27 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. However, habitable rooms per hectare represent a more accurate reflection of the amount of residential floorspace being proposed for a site and is more relevant when considering viability issues (including the provision of affordable

⁹⁷ Mayor of London, The London Plan, 2015, Policy 3.7

housing).

- 1.3.28 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 study⁹⁸ on optimising development provides guidance on the relationship between density and viability, including highlighting the importance of a constructive development management approach in addressing this by:
- Engaging in pre-application discussions to help shape emerging proposals;
 - Understanding the financial drivers behind partners' positions and focusing on trying to find workable solutions;
 - Agreeing rules of engagement for working together over financial appraisal (including appropriate confidentiality around sharing of sensitive financial information, agreeing the use of the Toolkit or other acceptable financial appraisal model, the meeting of scrutiny costs incurred by the borough, sharing information and agreeing inputs/variables to be used in the appraisal); and
 - Setting targets for information sharing and decision-making.

Setting/Character

- 1.3.29 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 are therefore recommended to define the setting and resulting appropriate density as part of their LDF process within the context and guidance of Policy 3.4 and the notes attached to Table 3.2 in the London Plan:

- 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.

- 1.3.30 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

⁹⁸ Maccreanor Lavington et al 2012 ibid Section 7 J

sites' and 'borders and edges' below).

- 1.3.31 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.
- 1.3.32 The 800m distance is generally taken to approximate to 10 minutes walking distance⁹⁹. 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.
- 1.3.33 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.

- 1.3.34 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

- 1.3.35 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. This setting needs to accord with the location of the site including distance to town centres and other infrastructure, and with the local and strategic objectives for the area.
- 1.3.36 Policy 3.7 recognises the particular potential for large sites to create distinctive neighbourhoods and generate the critical mass to support social,

⁹⁹ 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

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 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').

- 1.3.37 Of particular relevance to large site development is research¹⁰⁰ 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 facilities¹⁰¹, which in turn supports 'place shaping' to which local communities can relate. Such sites need to support the principle of creating 'walkable neighbourhoods'.
- 1.3.38 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 Phase 1, proposed density for Phases 1 and 2, proposed density for phase 1, 2 and 3 etc. 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.

Sites on borders and edges of 'settings'

- 1.3.39 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.
- 1.3.40 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

¹⁰⁰ URS, Patel Taylor. London Plan Density Matrix Review. GLA, 2006

¹⁰¹ Llewellyn Davies. Sustainable residential Quality: exploring the housing potential of large sites. CON 68. LPAC, 2000

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.

- 1.3.41 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 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 (Policies 7.4, 7.1).

Standards for privacy, daylight and sunlight

- 1.3.42 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 guidelines¹⁰² to assess

the daylight and sunlight impacts of new development on surrounding properties. Guidelines should be applied sensitively to higher density development, especially in opportunity areas, town centres, large sites and accessible locations. 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. The degree of harm on adjacent properties should be assessed, drawing on broadly comparable interfaces of residential development found in 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

- 1.3.43 There are still large parts of London that are currently substantially undeveloped or have for other reasons 'no definable character'¹⁰³. This is especially the case in East London and former industrial sites. In such areas new developments will be unlikely to interfere with existing settings and offer particular scope for place shaping to make them 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)

¹⁰² BRE, Site layout planning for daylight and sunlight: a guide to good practice, BRE, 2011

¹⁰³ URS, Patel Taylor. London Plan Density Matrix Review. GLA, 2006

and capacity);

- their location (i.e. the distance to the closest town centre), and planned future setting; and
- scope for mixed use development, especially to contribute to place shaping.

Small Sites

- 1.3.44 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 may suggest that higher or lower densities are necessary to take account of local context.
- 1.3.45 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 this¹⁰⁴. 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 main bus corridors.

Developments above the density ranges

- 1.3.46 Where proposals are made for developments above the relevant density range they must be tested rigorously, taking particular account not just of factors covered by Policy 3.4¹⁰⁵ but also other policies which are relevant to exceptionally high density development. These include different aspects of residential quality and ‘liveability’ related to proposed dwelling mix, design and quality (taking into account the range of factors outlined in sections 2.2 – 2.4 of this SPG), physical access to services, long term management of communal areas, and the wider context of the proposal including its contribution to local ‘place shaping’ as well as concerns over ‘place shielding’ Such proposals must also be assessed in terms of their bearing on the capacity of existing local amenities, infrastructure and services to support the development. As the Outer London Commission¹⁰⁶ notes, “exceptions to the (density) ranges should be just that, whether above or below the appropriate range, and must be justified robustly”. Where proposals above the density ranges can be robustly justified, the design quality of new development and the public realm should be of an exemplary standard in terms of the

¹⁰⁴ Llewelyn Davis et al 1998 ibid

¹⁰⁵ Existing or planned public transport capacity, local context and character and the design principles in Chapter 7 of the London Plan.

¹⁰⁶ Outer London Commission 2012 ibid para 8.24

Mayor's housing quality standards, and the design principles set out in Policy 3.5 and chapter 7 of the London Plan.

Developments below the density ranges

- 1.3.47 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.
- 1.3.48 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 character¹⁰⁷. 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. Annex 3 provides further guidance on the flexibility in parking policy to address the distinct

circumstances of these locations.

- 1.3.49 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 ranges should be addressed as exceptions to policy and tested rigorously. These should be robustly justified based on 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

- 1.3.50 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

¹⁰⁷ Mayor's Outer London Commission. Second Report to the Mayor. GLA, 2012

requirements; the potential for multi-use facilities and co-locating housing and social infrastructure; and site-specific viability, deliverability, contextual and design considerations.

1.3.51 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 dis-incentivise 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 1.3.60-63 should be considered in relation to mixed use development and the inclusion of large areas of open space within a site area.

1.3.52 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

1.3.53 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.

1.3.54 In taking account of local character, Policy 3.4 resonates with section 7 of 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.¹⁰⁸ 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.

- 1.3.55 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.
- 1.3.56 Archaeological Priority Areas; English Heritage 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.

Levels of car parking

- 1.3.57 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).
- 1.3.58 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 uses¹⁰⁹. 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 itself¹¹⁰.
- 1.3.59 However, car ownership (if not its frequent use) is something which many Londoners value. In line with the NPPF¹¹¹, the Plan recognises this in its central axiom to optimise development potential alongside transport capacity.

¹⁰⁹ 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*
Maccreeanor Lavington et al 2012 *ibid*

¹¹⁰ eg in terms of internal space standards, storage, 'Lifetime Home' requirements and more energy efficient forms on design and construction

¹¹¹ DCLG NPPF 2012 *ibid* paras 39 - 40

¹⁰⁸ DCLG, NPPF, para 60

Parking poses particular issues in outer London where development densities and public transport provision are relatively low and residents are more dependent on the car than elsewhere in the capital (London Plan para 2.36). The Mayor asked the Outer London Commission 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 guidance on residential parking in Annex 3.

Calculating densities

1.3.60 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.

1.3.61 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

1.3.62 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 services .

1.3.63 In calculating density in vertically-mixed schemes (i.e. where housing is on top of non-residential uses), the size of the site should 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). 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

¹¹² Area measurements 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 in mixed use development is given on page 42.

plot ratio for these purposes, the total floorspace of all uses (measured as GIA) should be divided by the net site area. In addition:

- B all proposed non-residential floorspace (measured GIA) should be counted. GIA should be as defined in the RICS 6th Edition 'Code of Measuring Practice for Surveyors and Valuers', or subsequent editions,
- C the floorspace of proposed student housing and residential institutions (Use Class C2) should be counted as non-residential space.

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

Standards review

2.1.1 This Section of the SPG addresses the quality and design of housing developments (Policy 3.5). This policy was not amended by the Further Alterations to the London Plan. However, this chapter is being updated to reflect the Government Housing Standards Review, which sought to set consistent standards for housing across the country. The Mayor has worked closely with Government to ensure that the national standards reflect the specific design and quality requirements of London.

2.1.2 The Mayor is consulting¹¹³ on minor alterations to the London Plan (MALP) to 'adopt' the Government's new national technical standards. These standards comprise new additional 'optional' Building Regulations on water and access, and a new nationally described space standard (collectively known as the new national technical standards). The system complements the existing set of building regulations which are mandatory. This section of the SPG is therefore updated to set out which of the new national technical standards are proposed through MALP. For ease of comparison with current London standards the format and standard numbers reflect that of the 2012 SPG. This approach helps clearly identify where a standard will be removed or changed as a consequence of adopting the new national technical standards. Annex 1 provides a summary of the proposed standards against the standards in the 2012 SPG. It should be noted that where the new national technical standards are applied, the

whole of the relevant standard applies even if all the details are not discussed in this SPG.

2.1.3 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 dwellings¹¹⁴. This is to ensure consistency and give greater clarity to developers. As the London Plan forms part of the borough's development plan, once published, the MALP will enable boroughs to apply the standards adopted in MALP at the local level without requiring further assessment of need and viability at the local level or specifically adopt them in their local plans.

2.1.4 In addition to reflecting the new national technical standards, some amendments have been made to standards not impacted by the review, such as those relating to outside the dwelling; these amendments are to improve clarity, implementation and consistency with other Mayoral guidance.

2.1.5 **Transition** – The Mayor has published his policy statement which sets out which of the Government's standards apply from October in advance of MALP being published/adopted. This SPG aligns with that policy statement and provides additional technical detail.

¹¹³ MALP consultation 11th May 2015- 22nd June 2015

¹¹⁴ 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*

The importance of housing quality

2.1.6 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”¹¹⁵. The London Plan reflects this and promotes design quality in all new homes to enhance and extend London’s proud 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.

2.1.7 Prior to the adoption of the housing standards the quality of housing developments in London was variable. Too many dwellings fell short of previous London Plan design quality objectives, and only a small proportion were assessed by CABE as being ‘good’ or ‘very good’¹¹⁶. Policy 3.5 of the London Plan recognises that design quality is a fundamental issue for all tenures and that the size of housing¹¹⁷ is a central issue affecting quality.

2.1.8 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 to be 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. Accessibility is particularly important given London’s projected older population (see Part 3 - Choice).

2.1.9 In 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.

Design quality and the NPPF

2.1.10 The Housing Standards in this part of the SPG support the NPPF’s core planning principle to ‘always seek to secure high quality design’¹¹⁸ and its aim to ‘deliver a wide choice of high quality homes.’¹¹⁹ Standards reflect the ‘great importance’ Government attaches to the design of the built environment and its view that good design ‘is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.’¹²⁰ They take up

¹¹⁵ Mayor of London. Planning for a Better London. GLA, 2008

¹¹⁶ Commission for Architecture and the Built Environment. Housing Audits. CABE, 2004 to 2007.

¹¹⁷ HATC. London Housing Standards 2009/10. A report for the GLA. GLA, 2012

¹¹⁸ DCLG, National Planning Policy Framework (NPPF). , DCLG. 2012. Paragraph 17, 4th bullet,

¹¹⁹ DCLG. NPPF. DCLG 2012 paragraph 50

¹²⁰ DCLG, NPPF, CLG, 2012, para 56

Government's suggestion to 'consider using design codes where they could help deliver high quality outcomes.' They reflect emphasis in the NPPF that design requirements should 'avoid unnecessary prescription or detail' and 'not attempt to impose architectural styles or particular tastes...and should not stifle innovation, originality or initiative.'¹²¹

New national technical standards

2.1.11 Some of the Government's standards will be brought into mandatory building regulations. For others, the Government is either setting 'optional' building regulations (access and water) or introducing 'optional' technical housing standards (space). The Government is clear that "optional standards should only be required through new Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPF"¹²². This will be tested through the Plan examination process (EiP). The fact that London's current standards, which have been in place since 2011 and are broadly in line with the Government's standards, are being delivered in London is proof of their deliverability and their limited impact on viability. These standards have already been subject to an independent impact assessment¹²³, and were incorporated in a wider viability appraisal of housing capacity

and delivery in London (the SHLAA)¹²⁴ - evidence which has been tested at an EiP. However, to provide evidence for the forthcoming Minor Alterations to the London Plan, the Mayor commissioned a study¹²⁵ to evidence both the need for the optional standards in London and to test the viability of these standards, focusing particularly where the nationally described standards differ from the current London Plan.

2.1.12 This need and viability¹²⁶ study builds on the work which underpinned the 2011 Plan and identifies a clear need for standards in London. In addition, the study investigated the implication on viability of adopting the Government's optional standards. Given the similarity between London's current standards and the Government's optional standards, the viability study found that the adoption of the Government's standards would have a very limited impact on viability in London.

Standards and London Plan Policies

2.1.13 As detailed above, this SPG sets out how the new national technical standards will be applied in London. The aim of the MALP is to formally 'adopt' the Governments nationally described space standards, which will apply to all homes and will apply 'optional' building regulation M4 (2) 'accessible and adaptable' dwellings to 90% of homes, and optional building regulation M4 (3) 'wheelchair user dwellings' to 10% of

¹²¹ DCLG. NPPF. CLG 2012 paras 59 - 60

¹²² 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

¹²³ GVA Grimley. Draft London Housing Design Guide: Cost and Delivery Impact Assessment. LDA, GLA, HCA, 2010.

¹²⁴ Three Dragons, David Lock Associates and TradeRisks Ltd, 2013 GLA SHLAA Viability Assessment

¹²⁵ David Lock Associates, Hoare Lea and Gardiner and Theobald. Housing standards review – Evidence of need and Viability Study. 2015

¹²⁶ *ibid*

- homes.
- 2.1.14 In addition to these ‘optional’ standards, the government has also introduced a mandatory standard for security and has consolidated some of the now withdrawn Code for Sustainable Homes in to into Building Regulations. Overall, the government’s standards are very much aligned with the London Plan’s current standards.
- 2.1.15 If successfully adopted through MALP, the standards in the London Plan and this SPG will apply across London. In line with the Governments approach to national housing standards, Borough’s should not set more stringent standards in their local plans, or introduce any additional standards
- 2.1.16 Not all the SPG standards are affected by the Government’s review. In particular, those that apply at a neighbourhood scale and standards which are not focused on internal space (for example, those which relate to entrances, approaches, circulation, privacy, private open space, dual aspect, active frontages, etc) will continue to be able to be set through planning.
- 2.1.17 Most of the Plan’s housing standards are in fact already London Plan policy requirements or devolve from other relevant guidance (Annex 2). This SPG brings them together in an easy to use format and as a coherent expression of planning policy to improve the quality of housing output. Standards in this SPG apply to all tenures and have been informed by the Interim London Housing Design Guide¹²⁷ (LHDG). Although the design guide does not have formal status in the planning system, it can be used more generally as best practice, and is used on GLA owned land.
- 2.1.18 The standards integrate key policies in the London Plan 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 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*).
- 2.1.19 Importantly, the standards reflect the Mayor’s policy that new housing should meet the needs of 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

¹²⁷ Mayor of London. London Housing Design Guide. Interim Edition (LHDG). LDA, 2010

for smaller families, or in the provision of larger homes. These concerns are addressed as a policy requirement for accessible and adaptable dwellings and for wheelchair user dwellings (Policy 3.8 Housing Choice).

POLICY 3.5 QUALITY AND DESIGN OF HOUSING DEVELOPMENTS (INCLUDING MINOR ALTERATIONS DRAFT SECTION C)

Strategic

- A Housing developments should be of the highest quality internally, externally and in relation to their context and to the wider environment, taking account of strategic policies in this Plan to protect and enhance London’s residential environment and attractiveness as a place to live. Boroughs may in their LDFs introduce a presumption against development on back gardens or other private residential gardens where this can be locally justified.

Planning decisions and LDF preparation

- B The design of all new housing developments should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces, taking particular account of the needs of children and older people
- C LDFs should incorporate minimum space standards that generally conform with Table 3.3. The Mayor will, and boroughs should, seek to ensure that new development reflects these standards. The design of all new

dwellings should also take account of factors relating to ‘arrival’ at the building and the ‘home as a place of retreat’, have adequately sized rooms and convenient and efficient room layouts, meet the changing needs of Londoners over their lifetimes, address climate change adaptation and mitigation and social inclusion objectives and should be conceived and developed through an effective design process

Minor alterations draft proposed text;

- C LDFs should incorporate requirements for accessibility and adaptability¹²⁸, minimum space standards¹²⁹ set out in Table 3.3 and water efficiency.¹³⁰ The Mayor will, and boroughs should, seek to ensure that new development reflects these standards. The design of all new dwellings should also take account of factors relating to ‘arrival’ at the building and the ‘home as a place of retreat’. New homes should have adequately sized rooms and convenient and efficient room layouts which are functional and fit for purpose, meet the changing needs of Londoners over their lifetimes, address climate change adaptation and mitigation and social inclusion objectives and should be conceived and developed through an effective design process¹³¹.
- D Development proposals which compromise the delivery of elements

¹²⁸Requirements M4(2) and M4(3) of Schedule 1 to the Building Regulations 2010. HM Government 2015.

¹²⁹Technical housing standards – nationally described space standard. DCLG 2015

¹³⁰ London Plan Policy 5.15

¹³¹ Mayor of London, Housing SPG

of this policy may be permitted if they are demonstrably of exemplary design and contribute to achievement of other objectives of this Plan.

- E The Mayor will provide guidance on implementation of this policy that is relevant to all tenures.

Application of the Mayor's housing standards

- 2.1.20 In line with Policy 3.5 of the London Plan and the Mayor's Housing Strategy, 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 standards apply to all tenures. The standards do **not** apply to specialist forms of housing including student housing, sheltered housing and homes in multiple occupation.
- 2.1.21 The new national technical standards will be applied in two ways; the access and water standards will be applied through building regulations – planning policy will set out which optional building regulation should be met and this will be applied through a condition relating to the application. Compliance will be assessed in the same manner as other building regulations. The space standards will be applied through planning policy as currently.
- 2.1.22 Because the relevant 'optional' building regulation is applied through a condition, all elements of the regulation must apply. However, where it is demonstrated that a development cannot meet a certain aspect of the building regulation and thus a lower standard is applied, boroughs may still encourage developers to meet other aspects of the higher level building regulation. For example, where a three storey development cannot meet M4(2) because the provision of a lift is not possible, the development could still be encouraged to meet the other requirements of M4(2), even though the base level building regulation M4(1) 'visitable dwellings' is applied.
- 2.1.23 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.
- 2.1.24 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. For convenient and effective implementation, they are summarised in Annex 1.
- 2.1.25 The standards set out the 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 the standards in this SPG may require some flexibility. Consideration should be given to these standards alongside achievement of other objectives 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.

- 2.1.26 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.
- 2.1.27 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 whole range of policy concerns bearing on a particular site.
- 2.1.28 For larger developments, and especially in planning frameworks for development proposals that are over five hectares or capable of accommodating more than 500 dwellings, all of the standards outlined in Section 2.2 and 2.3 below should be explicit considerations that are clearly outlined in a planning framework

or development proposal.

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 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. This resonates strongly with NPPF policy to promote healthy communities¹³².
- 2.2.2 Policy 3.5 is supported by Policy 7.1 which seeks to implement 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 should 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

¹³² DCLG, NPPF 2012 Op. cit. paragraphs 69-74.

Neighbourhoods is provided in the Accessible London, Town Centres and Social Infrastructure SPGs.

Defining Good Places

Standard 1.1.1 - 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 1.1.2 - Development proposals should demonstrate:

- c How the scheme complements the local network of public spaces, including how it integrates with existing streets and paths
- d 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.
- e 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. This is supported further in Policy 7.4 *Local Character*. The Mayor encourages a design approach that carefully responds to the whole context of a development and builds on an understanding of the place, the appreciation 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

seek to enhance provision of green infrastructure in the public realm¹³³, 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*).

- 2.2.6 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 *Designing out Crime* and Standard 3.1.5). 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 boroughs in resisting forms of development which compromise the Mayor’s objective to secure a more socially inclusive city, including ‘gated communities’¹³⁴.

Communal and Public Open space

Standard 1.2.1 - Development proposals should demonstrate that they comply with the borough’s 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 1.2.3 - Where communal open space is provided, development proposals should demonstrate that the space:

- a is overlooked by surrounding development;
- b is accessible to wheelchair users and other disabled people;
- c is designed to take advantage of direct sunlight;
- e has suitable management arrangements in place.

- 2.2.7 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 7.19 *Biodiversity and Policy 7.21 (Trees)*. 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.

- 2.2.8 Designers and developers should undertake a review of existing open spaces in the area and take account

¹³³ Mayor of London, CABI. Open Space Strategies – best practice guidance. GLA, 2008 (currently under review)

¹³⁴ Mayor of London LP 2011 *ibid* para 3.60

of the requirements set by individual boroughs in their Local Development Frameworks and open space strategies, based on the LP Benchmark Public Space Hierarchy [LP Table 7.2]. Larger 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 spaces¹³⁵.

- 2.2.9 Open space, whether for public or private communal use should be designed to be safe, inviting and well used, without the fear of crime. It should encourage an appropriate sense of ownership and should be managed appropriately to ensure that it remains useful and welcoming to all users. The space should be designed to minimise ongoing management and maintenance costs 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 CABE¹³⁶.

Existing gardens

- 2.2.10 Policy 3.5 supports a presumption against garden development 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 LP policies (see paragraphs 1.2.18 – 25 of this SPG). Para 1.2.25 of this SPG provides guidance on the use of strategic planning policy to support local planning approaches to inappropriate subterranean development.

Standard 1.2.2 (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.

- 2.2.11 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 stimulating¹³⁷ play and informal recreation 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.
- 2.2.12 The Mayor’s Play and Informal Recreation SPG provides further advice to boroughs 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

¹³⁵ 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

¹³⁶ 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

¹³⁷ For example, see London Sustainable Development Commission. Sowing the Seeds – reconnecting London’s children with nature. GLA, 2011

be adjusted at a borough level, in line with a local play strategy and supporting audit.

2.2.13 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 development¹³⁸.

2.2.14 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.¹³⁹ 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 development¹⁴⁰. 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.¹⁴¹ This should be secured through planning obligations or Community Infrastructure Levy.

2.2.15 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 or wide smooth level paths around and to play equipment and the lack of accessible toilets¹⁴². Further guidance on this is provided in the Accessible London SPG.

2.2.16 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

2.2.17 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*

¹³⁸ Mayor of London, Play and Informal Recreation SPG, GLA, 2012, paragraph 4.37 – 4.41

¹³⁹ Mayor of London, Play and Informal Recreation SPG, GLA, 2012, paragraph 5.10

¹⁴⁰ Mayor of London, Play and Informal Recreation SPG, GLA, 2012, pages 63-67

¹⁴¹ Mayor of London, Play and Informal Recreation SPG, GLA, 2012, paragraph 5.10

¹⁴² 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

*Design*¹⁴³. Buildings and spaces should deter criminal opportunism and provide residents with an increased sense of security, without being intimidating or reliant on excessive management.

- 2.2.18 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.

POLICY 7.3 DESIGNING OUT CRIME

Strategic

- A Boroughs and others should seek to create safe, secure and appropriately accessible environments where crime and disorder, and the fear of crime do not undermine quality of life or community cohesion.

Planning decisions

- B Development should reduce the opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating. In particular:
- a routes and spaces should be legible

and well maintained, providing for convenient movement without compromising security;

- b there should be a clear indication of whether a space is private, semi-public or public with natural surveillance of publicly accessible spaces from buildings at their lower floors;
- c design should encourage a level of human activity that is appropriate to the location, incorporating a mix of uses where appropriate, to maximize activity throughout the day and night, creating a reduced risk of crime and a sense of safety at all times;
- d places should be designed to promote an appropriate sense of ownership over communal spaces;
- e places, buildings and structures should incorporate appropriately designed security features; and
- f schemes should be designed to minimise on-going management and future maintenance costs of the particular safety and security measures proposed.

The above measures should be incorporated at the design stage to ensure that overall design quality is not compromised.

¹⁴³ Association of Chief Police officers. Secured by Design, New Homes 2010.

I. Housing for a diverse city

Density

Standard 2.1.1 (and Policy 3.4) - Development proposals should demonstrate how the density of residential accommodation satisfies London Plan policy relating to public transport accessibility levels (PTALs) and the accessibility of local amenities and services, and is appropriate to the location

2.2.19 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 (as defined by Public Transport Accessibility Levels [PTALs]), and the design standards of this part of the SPG.

Residential Mix

Standard 2.2.1 (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.

2.2.20 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 (see Parts 3 and 4 of this SPG). 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 (see Standard

4.1.1 below), the most important of the housing standards covered by this SPG.

2.2.21 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.

2.2.22 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 accessibility (see paragraphs 1.3.17 and 7.4.9-11 of this SPG).

2.2.23 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 3.1.5).

2.2.24 Where family units are provided on the

upper floors it is important to ensure generous 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.

- 2.2.25 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.
- 2.2.26 The London Plan underscores the need to resist developments which might compromise objectives to secure a more socially inclusive city eg ‘gated communities’ (London Plan para 3.60), and the need for affordable housing to be integrated with the rest of the development and have the same external appearance as other housing (see LP para 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 the space standards, which new dwellings will be 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.

II. 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 3.1.1 - 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 3.1.2 - The distance from the accessible car parking space of standard 3.3.4 to the home or to the relevant block entrance or lift core should be kept to a minimum.

Standard 3.1.3 - Approach routes should comply with the requirements of Part M4(2)¹⁴⁴, unless they also serve Wheelchair User Dwellings, where they should comply with the requirements of Part M4(3)¹⁴⁵.

Standard 3.1.4 - All entrances should comply with the requirements of Part M4(2), unless they also serve Wheelchair User Dwellings, where they should comply with the requirements of Part M4(3).

¹⁴⁴ Requirement M4(2) of Schedule 1 to the Building Regulations 2010.HM Government 2015.

¹⁴⁵ Requirement M4(3) of Schedule 1 to the Building Regulations 2010.HM Government 2015

2.3.3 The distance from the accessible car parking spaces to the home or to the relevant block entrance or lift core should be kept to a minimum and should be preferably level or gently sloping.

Active frontages

Standard 3.1.5 – 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.

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 also supported in the Town Centres SPG.

2.3.5 As a general rule, the more important an area of publically accessible space abutting a building in terms of pedestrian activity, 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 and activity 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 5.3.1, 5.1.1 and 5.6.1), 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.

Shared Circulation

Standard 3.2.1 - Each core should be accessible to generally no more than eight units on each floor.

Standard 3.2.2 - 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:

- i i. more than 25 dwellings are served by one core, or
- ii ii. the potential occupancy of the dwellings served by one core exceeds 100 bed spaces, or
- iii iii. more than 8 dwellings are provided per floor¹⁴⁶.

Standard 3.2.3 - Where dwellings are accessed via an internal corridor, the corridor should receive natural light and adequate ventilation where possible.

Standard 3.2.4 - Communal circulation should comply with Part M4(2), unless they also serve Wheelchair User Dwellings, where they should comply with the requirements of Part M4(3).

Standard 3.2.5 – *Removed following Government’s standards review.*

Standard 3.2.6 - Every M4(2) dwelling should be provided with step-free access. All dwellings entered at the seventh floor (eighth storey) and above should be served by at least

¹⁴⁶ Based on: Secured by Design, ibid

two lifts.

Standard 3.2.7 - Every designated Wheelchair User Dwelling above the ground floor should be served by at least one wheelchair accessible lift¹⁴⁷. It is desirable that every wheelchair accessible dwelling is served by more than one lift.

Standard 3.2.8 - Principal access stairs should provide easy access¹⁴⁸ regardless of whether a lift is provided. Where homes are reached by a lift, it should be fully wheelchair accessible¹⁴⁹.

¹⁴⁷ Compliant with the requirements of Part M4 (3)

¹⁴⁸ Part K (Protection from falling, collision and impact) requirements for a general access stair.

¹⁴⁹ Compliant with the requirements of Part M4 (2)

2.3.8 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 eg in positioning access control systems so they can be used by as many people as possible.

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

2.3.10 Important considerations for shared circulation include:

- Dwelling size mix and 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.

2.3.11 It is recognised that the application of requirement M4(2) may have particular implications for blocks of four storeys or less, where historically the London Plan has not required 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 charges¹⁵⁰. However in certain specific cases, for example low rise blocks, flats above shops, or stacked maisonettes, complying with the requirement M4(2) in terms of step-free access to dwellings on first, second or third floor, may cause practical difficulties and have implications for viability of schemes and have implication for the affordability of service charges, where lifts have to be installed. Boroughs should consider the application of M4(2) to these particular type of schemes on a case by case basis. This may require 'bespoke' assessments of site-specific circumstances. Where it is demonstrated that installing a lift is not viable or would lead to significantly

higher service charges, then the base Building Regulation M4(1) could be applied, but schemes could still be encouraged to comply with the other requirements of M4(2). These dwellings would still be expected to comply with the nationally described space standards and other standards set out in the London Plan and this SPG.

Car parking

Standard 3.3.1 (and Policy 6.13) - All developments should conform to London Plan policy on car parking provision (see Annex 3 of this SPG for guidance on implementation of relevant policy including LP Policy 6.13 and associated standards below). In areas of good public transport accessibility and/or town centres the aim should be to provide no more than one space per dwelling. Elsewhere parking provision should be broadly as follows, depending on location as indicated in Annex 3:

- a 4+ bedroom dwellings: up to 2 spaces per dwelling
- b 3 bedroom dwellings: up to 1.5 spaces per dwelling
- c 1 - 2 bedroom dwellings: less than 1 per dwelling

Standard 3.3.2 - Each designated wheelchair user dwelling should have a car parking space that complies with Part M4 (3) 3.12 a-e.

Standard 3.3.3 - 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

¹⁵⁰ David Lock Associates et al 2015 Op. cit.

open spaces¹⁵¹.

Standard 3.3.4 - Where a dwelling has car parking within its plot, at least one parking space should comply with Part M4(2). Where parking is provided in communal bays, at least one space should be provided per block entrance or access core that complies with Part M4(3) in addition to spaces designated for wheelchair user dwellings.]

¹⁵¹ Building for Life op cit, Criterion 10

2.3.12 Car parking is a key design consideration and the Plan seeks to ensure an appropriate balance between enabling adequate 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, especially in low PTAL suburban neighbourhoods in outer London. Such sensitivity resonates with the approach proposed in the NPPF¹⁵² while recognising that in the unique circumstances of London parking is also a strategic issue. Further guidance is given in Annex 3 of this SPG on implementation of Policy 6.13 *Parking* and of the Parking Addendum to Chapter 6 which summarises maximum standards for dwellings of different sizes. The Accessible London SPG provides further detailed guidance on parking provision for disabled people. The Mayor is currently consulting on a set of minor

parking alterations which aim to provide more flexibility on the number of parking spaces provided as part of residential development in PTALs 0-1 of Outer London.

Cycle storage

Standard 3.4.1 - All developments should provide dedicated storage space for cycles at the following level:

- i 1 per studio and one bed
- ii 2 per all other dwellings.
- iii In addition, one short stay cycle parking space should be provided per 40 units.

Standard 3.4.2 - 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 acceptable¹⁵³.

¹⁵³ For more detail see: Transport for London Cycle Design Standards www.tfl.gov.uk/businessandpartners/publications/2766.aspx

¹⁵² DCLG NPPF 2011 ibid paras 39 - 40

2.3.13 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 3.5.1 - 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 3.5.2 - 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*.

2.3.14 London Plan Policy 5.17E requires the provision of suitable waste and recycling storage facilities in all new developments.

2.3.15 Refuse, green 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 (eg. from food waste). The provision and design of waste recycling facilities within residential developments should support and enable collection authorities to meet this requirement.

2.3.16 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 provided. 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.

III. Dwelling space standards

Internal Floor Area

Standard 4.1.1 (and Policy 3.5) - All developments should meet the following minimum space standards (as set out in Table 3.3 of the London Plan and the nationally described space standards).

NUMBER OF BEDROOMS	NUMBER OF BED SPACES	MINIMUM GIA (M2)			BUILT-IN STORAGE (M2)
		1 STOREY DWELLINGS	2 STOREY DWELLINGS	3 STOREY DWELLINGS	
1b	1p	39 (37)*			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0
	8p	125	132	138	

*Where a studio has a shower room instead of a bathroom, the floor area may be reduced from 39m² to 37m², as shown bracketed.

The Gross Internal Area of a dwelling is defined as the total floor space measured between the internal faces of perimeter walls that enclose a dwelling. This includes partitions, structural elements, cupboards, ducts, flights of stairs and voids above stairs. GIA should be measured and denoted in square metres (m²).

Standard 4.1.2 - Dwelling plans should demonstrate that dwellings will accommodate the furniture, access and activity space requirements relating to the declared level of occupancy.

- 2.3.17 LP Policy 3.5 places a significant focus on dwelling space standards. The Mayor regards the size of all new homes to be a key strategic issue and the Plan itself provides minimum space standards for dwellings of different types. They therefore have the force of development plan policy. The space standards 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.
- 2.3.18 The minimum gross internal floor areas (GIA¹⁵⁴) required for new homes are defined in relation to the number of occupants, bedrooms and storeys. The minimum GIAs align with the nationally described space standard. The minimum GIAs allow for the habitable room areas, circulation and storage space (except for cycles – see Standards 3.4.1 and 3.4.2), and the number of bathrooms and WCs considered desirable for each dwelling type, based on its potential occupancy. They provide sufficient space for one bathroom with WC in single storey dwellings designed to be occupied by between two and four people, and one bathroom with WC and one additional WC in flats designed to be occupied by five or more people, and in all homes on two or more levels. Additional bathrooms (such as en-suites), and other rooms including utility rooms and studies will require additional floor area above the minimum GIA- in broad terms an extra 3 sqm for every extra WC/shower and an extra 5sqm for every extra bathroom.
- 2.3.19 The 2010 LHDG¹⁵⁵ found that at that time “London has seen too many new homes built at, or even below, the lower end of each range of potential occupancy. Many new one bedroom homes only provide enough space for one person and many of those with three bedrooms can only be considered suitable for full time occupancy by two or three people.” For example, it is reported that relatively few three bedroom flats achieve a GIA of 86 sq m – the minimum considered adequate for a family of five. To ensure that shortfalls are addressed, choice is widened and local demand is reasonably met, individual boroughs are encouraged to define the mix of dwellings required for proposed developments in LDF policy – and to do so by occupancy, rather than just by the number of bedrooms. See table 3.3 and Standard 4.5.1.
- 2.3.20 For example, “where there is high demand for five person homes, this will mean that some flats with three bedrooms will be required to have a GIA of at least 86 sq m. Some smaller three bed flats, with a GIA between 74 sq m and 86 sq m, are likely to be acceptable in principle (subject to providing a good distribution of internal space, including enough storage) as good homes for four people of any tenure. local planners may also seek to restrict or encourage specific dwelling types, for example it may be desirable to restrict 2b4p, 3b6p and 4b8p dwelling types, particularly in affordable housing, because these types prevent any child from having a bedroom

¹⁵⁴ RICS Guidance Note: Code of Measuring Practice. A guide for property professionals. 6th Edition. RICS, 2007. GIA: “area of a building measured to the internal face of the perimeter wall at each floor level” This includes basements, mezzanines, galleries and hallways. It excludes areas with headroom less than 1.5m, garages, conservatories, external open-side balconies, greenhouses, garden stores, fuel stores ‘and the like’ and terraces.

¹⁵⁵ Mayor of London LHDG ibid p 47

to themselves when the dwelling is fully occupied.”¹⁵⁶

2.3.21 In pre-application discussions boroughs are advised to clearly specify the size/occupancy mix expected from a development in light of their local dwelling size mix policy and when assessing bedspace occupancy associated with the application:

- every habitable room that is not the main living room, dining room or kitchen should be regarded as a bedroom for the purposes of applying the standards;
- each home for two or more people should contain at least one double/twin bedroom;
- each single bedroom should provide adequate space for furniture and access required by one occupant;
- each double bedroom should provide adequate space for the furniture and access required by two occupants;
- every bedroom providing two adequate bedspaces should be counted as a double room; and
- all bedspaces should be counted when declaring the occupancy level, and design and access statements should clearly state the number of occupants each home is designed to accommodate. This should be assessed against using the bedroom areas noted in standard 4.5.1. Careful consideration should also be given to the provision of decent sized living rooms.

2.3.22 The space standards outlined in the London Plan are minima and should be exceeded where possible. They should be a basis to promote innovative thinking about designing space and how it is to be used within the home. These standards should not have a significant impact on build costs or the number of units possible on a site in relation to current practice¹⁵⁷. 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.

2.3.23 The minimum recommended GIA for a one person dwelling with a bathroom rather than a shower room is 39 sq m rather than 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 other 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

¹⁵⁶Mayor of London LHDC, p 47

¹⁵⁷ GVA Grimley op cit

should also be clearly marketed as one person dwellings.

- 2.3.24 To provide a better understanding of how properties best meet housing needs, the Mayor will work with public, private and voluntary agencies to explore how information on GIA and design occupancy can be used transparently and consistently when describing dwellings to potential new occupiers.

Standard 4.2.1 – Removed following Government’s standards review.

Circulation in the home

Standard 4.3.1 - The minimum width of hallways and other circulation spaces inside the home should comply with Part M4(2).

Standard 4.3.2 - The design of dwellings of more than one storey should incorporate potential for a future stair lift to be installed by providing stairs that complies with M4(2).

Living rooms, dining rooms, kitchens

Standard 4.4.1 - Removed following Government’s standards review.

Standard 4.4.2 - Removed following Government’s standards review.

Standard 4.4.3 - Removed following Government’s standards review.

Standard 4.4.4 - There should be space for turning a wheelchair in dining areas and living rooms and basic circulation space for wheelchairs elsewhere.

Standard 4.4.5 - A living area that complies with M4(2) should be at entrance level.

Standard 4.4.6 - Glazing to the principal window should comply with Part M4(2). At least one opening window in the principal living area should comply with Part M4(2).

- 2.3.25 The nationally described space standard GIAs incorporate combined floor areas for living/kitchen/dining space corresponding to the occupancy of a dwelling.
- 2.3.26 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.
- 2.3.27 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.
- 2.3.28 To give residents flexibility, larger dwellings should 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.

Bedrooms

Standard 4.5.1 – The minimum area of a single bedroom should be 7.5sqm. The minimum area of a double or twin bedroom should be 11.5sqm to comply with the

nationally described space standard.

Standard 4.5.2 – One double or twin bedroom should be at least 2.75m wide and every other double or twin should be at least 2.55m wide, in most of the length of the room, to comply with the nationally described space standard.

Standard 4.5.3 – Removed following Government’s standards review.

Standard 4.5.4 – Removed following Government’s standards review.

2.3.29 Double and twin bedrooms have the same recommended minimum floor area to encourage the provision of rooms suitable for adults or children, with one double bed or two single beds. It will be important that the location of the door, window and any built-in furniture permits this flexibility. Dwelling plans should demonstrate that dwelling types provide flexibility by showing that at least one bedroom is capable of being used and furnished as either a double or a twin room according to occupier preferences.

2.3.30 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.

Bathrooms and WCs

Standard 4.6.1 – Removed following Government’s standards review.

Standard 4.6.2 – To provide step-free access to a WC that is suitable and convenient to some wheelchair users and, where reasonable, to make provision for showering, dwellings should comply with the requirements of Part

M4(2).

Standard 4.6.3 – An accessible bathroom that complies with Part M4(2) should be provided in every dwelling on the same storey as a double (or twin) bedroom.

Standard 4.6.4 – Walls in the bathrooms and WCs should be capable of taking adaptations and comply with Part M4(2).

Storage and utility space

Standard 4.7.1 – Built-in general internal storage space should be provided to comply with Table 3.3 of the London Plan, and the nationally described space standard 4.1.

2.3.31 In line with the nationally described space standard;

- any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless solely used for storage (if the area under the stairs is to be used for storages assume a general floor area of 1m² within the Gross Internal Area);
- any other area that is used solely for storage and has a headroom of 900–1500mm (such as under eaves) is counted at 50% of its floor area, and any area lower than 900mm is not counted at all;
- a built in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum set out in standards 4.5.1 and 4.5.2. The built-in area in excess of 0.72m² and 0.36m² in a single bedroom counts towards the built-in storage requirement.

Study and work

Standard 4.8.1 - Dwelling plans should demonstrate that all homes are provided with adequate space and services to be able to work from home.

Standard 4.8.2 - Service controls should be within easy reach and comply with Part M4(2).

- 2.3.32 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.
- 2.3.33 The nationally described space standard incorporates space for a desk and chair within minimum GIAs. Dwelling plans and furniture layouts should demonstrate that all homes provide residents with adequate space and services to be able to work from home.

Wheelchair accessible dwellings

Standard 4.9.1 (and Policy 3.8) - Ten percent of new housing should be designed to be wheelchair user dwellings that comply with Part M4(3).

- 2.3.34 It is essential that all people regardless of any disability can access housing that meets their needs. Policy 3.8 Housing choice requires 10 per cent of new housing be designed to be wheelchair

user dwellings –(wheelchair accessible or adaptable for residents who are wheelchair users).

Private open space

Standard 4.10.1 - 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 ¹⁵⁸.

Standard 4.10.2 - All private outdoor space should have accessible threshold from the home ¹⁵⁹,

Standard 4.10.3 - The minimum depth and width for all balconies and other private external spaces should be 1500mm ¹⁶⁰.

¹⁵⁸ Based on: furniture and activity requirements of the HCA HQI ibid on accessibility and adaptability criteria

¹⁵⁹ Balconies and terraces over habitable rooms which require a step up to increase slab thickness / insulation are exempt from the accessible threshold standard.

¹⁶⁰ Based on the furniture and activity requirements of the HCA HQI ibid and on accessibility and adaptability criteria op cit

- 2.3.35 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 in terms of Standard 4.10.1. This space does not count towards the GIA used in calculating the internal space standard 4.1.1.
- 2.3.36 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 and minimum living area of the dwelling, and may be added to living rooms or may form a separate living room. 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 D ¹⁶¹. 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.

- 2.3.37 Dwellings on upper floors should all have 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.

IV. Home as a Place of retreat

- 2.3.38 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.

- 2.3.39 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.

Privacy

Standard 5.1.1 - 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 spaces.¹⁶²

¹⁶² Based on: Secured by Design op cit

- 2.3.40 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

¹⁶¹ DCLG NPPF 2012 ibid para 123; DEFRA. Noise Policy Statement for England. Explanatory Note. DEFRA, 2010

sometimes unnecessarily restrict density¹⁶³. 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 5.2.1 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 avoided¹⁶⁴.

¹⁶⁴ DCLG NPPF 2012 *ibid* para 123; DEFRA. Noise Policy Statement for England. Explanatory Note. DEFRA, 2010

2.3.41 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.

2.3.42 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

¹⁶³ Maccreeanor Lavington Architects, Emily Greeves Architects, Graham Harrington. Housing Density Study. GLA, 2012

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

2.3.43 Single aspect dwellings are more difficult to ventilate naturally and more likely to overheat (see Standard 6.3.1 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 facing single aspect dwellings should be avoided wherever possible. 'North facing' is usually defined as an orientation less than 45 degrees either side of due north.

2.3.44 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. 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 be avoided. The design of single aspect ground floor dwellings will require particular consideration to maintain privacy and adequate levels of daylight.

Noise

Standard 5.3.1 (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.

- 2.3.45 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 NPPF¹⁶⁵.
- 2.3.46 All dwellings should be built with acoustic insulation and tested to current Building Regulations standards ¹⁶⁶. However, acoustic insulation should not be relied upon 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 5.4.1 – To address the unique heat island effect of London and the distinct density and flatted nature of most of London’s residential development, a minimum ceiling height for 2.5m for at least 75% of the dwelling area is strongly encouraged so that new housing is of adequate quality, especially in terms of light, ventilation and sense of space.

- 2.3.47 As set out in Table 3.3 of the minor alterations, ceiling heights are an important element in the design of a dwelling. They can positively impact 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 higher ceiling height than that set out in the nationally described space standard is strongly encouraged in London. A floor to ceiling height of at least 2.6m is considered desirable in habitable rooms, particularly in ground floor dwellings and dwellings on the lower floors of taller housing blocks. Rooms with sloping or stepped ceilings should achieve the minimum ceiling heights in at least 75% of the area of the room. It should also be recognised that it may be necessary to have lowered ceilings in kitchens and bathrooms (to allow for ducting).

¹⁶⁵ DCLG NPPF 2012 ibid para 123

¹⁶⁶ For further guidance please refer to: BRE Acoustics. Improving Sound Insulation in Homes, http://www.bre.co.uk/pdf/soundins_homes.pdf

2.3.48 For projects creating new dwellings in existing buildings and developments in sensitive historic contexts, including infill developments within conservation areas, lower ceiling heights may be permitted by the local borough. The inclusion of taller spaces is encouraged in all dwellings where it will not impact on the overall output from a development proposal.

Daylight and sunlight

Standard 5.5.1 - Glazing to all habitable rooms should be not less than 20% of the internal floor area of the room.

Standard 5.5.2 - 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.

2.3.49 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 (see Standard 6.3.1).

2.3.50 Where direct sunlight cannot be achieved in line with Standard 5.5.2, 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.

2.3.51 BRE guidelines¹⁶⁷ 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 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 5.6.1 (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)).

¹⁶⁷ BRE, Site layout planning for daylight and sunlight: a guide to good practice, BRE, 2011

2.3.52 LP Policy 7.14 seeks to minimise increased exposure to existing poor air quality and to prevent deterioration of existing poor air quality, including by seeking that new developments are ‘air quality neutral’¹⁶⁸. Developers should focus on reducing nitrogen oxides (NOx) 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 dust¹⁶⁹. 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.

2.3.53 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.

V. Climate Change Mitigation and Adaptation

2.3.54 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. 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.

Environmental performance

Standard 6.1.1 – Removed as part of the Government’s standards review

Standard 6.1.2 (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 6.2.1 (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
2016 - 2036	Zero carbon

¹⁶⁸ See the Mayor’s Sustainable Design and Construction Supplementary Planning Guidance for further guidance

¹⁶⁹ See Mayor of London. The Control of Dust & Emissions during Construction & Demolition. Supplementary Planning Guidance. July 2014

Energy hierarchy

2.3.55 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

2.3.56 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 promotes 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 emerging approach for achieving ‘zero’ carbon homes, 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.

2.3.57 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 networks¹⁷⁰. 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.

2.3.58 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

¹⁷⁰ 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>

boilers where no adverse air quality impacts are identified (Policy 7.14Be).

- 2.3.59 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 guidance¹⁷¹.

Overheating

Standard 6.3.1 (and Policy 5.9) - Development proposals should demonstrate how the design of dwellings will avoid overheating without reliance on energy intensive mechanical cooling systems.

- 2.3.60 In achieving the Standard 6.2.1 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 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 residents¹⁷².

- 2.3.61 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.

- 2.3.62 Standard 6.3.1 on Overheating is complemented by other standards which aim to help reduce overheating. Standard 5.2.1 promotes the development of dual aspect dwellings and seeks to minimise the number of single aspect units. Standard 5.4.1 establishes minimum floor to ceiling heights to assist with natural ventilation.

- 2.3.63 Policy 5.9 Overheating and Cooling provides further policy requirements to prevent overheating. This policy outlines the cooling hierarchy developments should follow.

- 2.3.64 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.¹⁷³ Where community heating is provided, hot water pipes should be well insulated and

¹⁷¹ Mayor of London, Energy Planning, GLA guidance on [preparing energy assessments](#), GLA, 2015

¹⁷² 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.

¹⁷³ Greater London Authority. Sustainable Design and Construction SPG, page 76

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.

- 2.3.65 In addition, Policy 5.10 Urban Greening and Policy 5.11 Green Roofs and Development Site Environments, seek to promote the use of planting, including green walls and soft landscaping to reduce the degree of heating of the urban environment. 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; 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 6.4.1 (and Policy 5.15) - New dwellings should be designed to ensure that a maximum of 105¹⁷⁴ litres of water is consumed per person per day.

¹⁷⁴ Excluding an allowance of 5 litres or less per head per day for external water use (as set out in the proposed MALP and 'optional' Requirement G2 of Schedule 1 to the Building Regulations 2010)

- 2.3.66 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 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 6.4.2 (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 Guidance¹⁷⁵.

Standard 6.4.3 (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.

¹⁷⁵ 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

- 2.3.67 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 details¹⁷⁶.

¹⁷⁶ Mayor of London. Regional Flood Risk Appraisal (RFRA) for the London Plan. GLA, 2009

2.3.68 Policy 5.13 Sustainable Drainage requires development proposals to utilise sustainable urban drainage systems (SUDS) to manage surface water runoff¹⁷⁷. 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 rate¹⁷⁸ (see Policy 5.11 Green Roofs and Development Site Environs).

Materials

Standard 6.5.1 - Developments should manage existing materials, specify sustainable materials that are robust and fit for purpose and secure the sustainable procurement of materials.

Standard 6.5.2 – Removed following Government's standards review.

2.3.69 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 6.6.1 (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.

¹⁷⁷ Further detail will be provided in a revised Sustainable Design & Construction SPG

¹⁷⁸ See also para 1.2.48 regarding subterranean development and hydrology

2.3.70 Policy 7.19 Biodiversity and access to nature promotes a proactive approach to the protection, promotion and management of biodiversity across the capital¹⁷⁹. 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.

2.3.71 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

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 LP.

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.
- Consider the London Housing Design Guide section 7 for best practice guidance on meeting standards, and for the furniture schedule required to demonstrate compliance with standard 4.1.2.

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 SPG¹⁸⁰. 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:

¹⁷⁹ Mayor of London. Improving Londoners' Access to Nature. London Plan Implementation Report. GLA, 2008

¹⁸⁰ www.london.gov.uk/priorities/planning/publications/accessible-london-achieving-an-inclusive-environment

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;
- street level site plan and block plans at each floor level;
- floor to ceiling heights shown on plans or sections; and
- sustainability statement.

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 zones¹⁸¹, 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.

¹⁸¹ For example, consider: London Housing Design Guide op cit, Schedule 2



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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. However, there are other factors to be taken into account, not least the needs of 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 then addresses the requirements of distinct groups. Part 4 of this SPG deals specifically with affordable housing.
- 3.0.2 The London Housing Strategy¹⁸² and London Plan complement each other in taking forward the Mayor's objectives to secure wider housing choice. Together, the Strategy and Policy 3.8 of the Plan are important not just in ensuring that development meets London's diverse local housing needs but also in securing equal life chances for all (Policy 3.1), promoting mixed and balanced communities (Policy 3.9) and, more generally ensuring that housing plays its full, pivotal role in improving the quality of life of all Londoners
- 3.0.3 As discussed in Part 2, this draft interim SPG reflects the changes proposed in the Minor Alterations to the London Plan. This means Policy 3.8 B c and d have been updated to reflect the 'optional' Building Regulations that are proposed through the MALP and will be applied from October 2015 as part of the transitional arrangements (see Part 2).

POLICY 3.8 HOUSING CHOICE (INCLUDING PROPOSED MINOR ALTERATIONS).

Strategic

- A Londoners should have a genuine choice of homes that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments.

LDF preparation and planning decisions

- B To inform local application of Policy 3.3 on housing supply and taking account of housing requirements identified at regional, sub-regional and local levels, boroughs should work with the Mayor and local communities to identify the range of needs likely to arise within their areas and ensure that:
- a new developments offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different sectors in meeting these
 - a1 the planning system provides positive and practical support to sustain the contribution of the Private Rented Sector (PRS) in addressing housing needs and increasing housing delivery.
 - b provision of affordable family housing is addressed as a strategic priority in LDF policies
 - c all new housing is built to 'The Lifetime Homes' standard

*Minor alteration draft – proposes replacing the above with;
c ninety percent of new housing meets Building Regulation requirement*

¹⁸² Mayor of London. Homes for London. The London housing Strategy. GLA, 2014

M4(2) 'accessible and adaptable dwellings'

- d ten per cent of new housing is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users

Minor alteration draft – proposes replacing the above with:

- d *ten per cent of new housing meets 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*
- e account is taken of the changing age structure of London's population and, in particular, the varied needs of older Londoners, including for supported and affordable provision
- f account is taken of the needs of particular communities with large families
- g other supported housing needs are identified authoritatively and co-ordinated action is taken to address them in LDF and other relevant plans and strategies
- h strategic and local requirements for student housing meeting a demonstrable need are addressed by working closely with stakeholders in higher and further education and without compromising capacity for conventional homes.
- i the accommodation requirements of gypsies and travellers (including travelling show people) are identified and addressed, with sites identified

in line with national policy, in coordination with neighbouring boroughs and districts as appropriate.

- j appropriate provision is made for the accommodation of service families and custom build, having regard to local need.

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 Framework make clear that the fundamental dynamic to planning for housing must be to meet this need, qualified only by the requirement that it be done so as to further the objective for sustainable development. Both the Plan (3.3A, 3.8) and the Framework go on to make clear that these assessments and associated policy must address the spectrum of need, not just one element of it – a key consideration when framing local housing need policies. In the unique circumstances of the London housing market, which spans the whole of the capital, the London Plan (3.8B) underscores this broadly based approach to identifying need by making clear that boroughs must take account of strategic as well as local need when framing these policies.
- 3.1.2 The 2013 London Strategic Housing Market Assessment (SHMA)¹⁸³ 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

¹⁸³ Mayor of London. The London Strategic Housing Market Assessment 2013 (SHMA). GLA 2014

assessments carried out by boroughs. It is important to note that this SHMA, like the 2004 HRS and the 2008 SHMA, 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.

3.1.4 To assist boroughs in preparing local/sub regional needs assessments within the context of the London SHMA, paragraph 3.1.19 provides key principles for carrying out a more local level SHMA. Annex 2 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, somewhat perversely, boroughs with very high house prices can also have low backlog need. This is because only higher income groups have been able to access 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.

3.1.7 Boroughs are advised to draw upon population and household projections developed by the GLA. Government and PINS have accepted these as underpinning the 2015 London Plan¹⁸⁴ and this Plan is part of every London boroughs development Plan. The GLA's own population projections have, so far, 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/

¹⁸⁴ Planning Inspectorate 2014. Report to the Mayor of London by Mr A Thickett.

or 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. In addition, it ensures they are detailed enough to feed into Housing Strategies (and meet the requirement of Section 8 of the 1985 Housing Act¹⁸⁵) and provide detailed evidence which can be used for determining/ negotiating individual planning applications. This approach has long been accepted in London and is intended to address the requirements of national guidance in a pragmatic, cost effective and coordinated way and ensure that borough DPDs are soundly based on authoritative evidence of housing need in the highly complex London housing market.

2013 SHMA

3.1.9 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 FALP EIP inspector¹⁸⁶.

3.1.10 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 report¹⁸⁷.

3.1.11 The results of the main SHMA scenario are set out in Table 3.1 below. This shows the net annualised housing requirement 2015/16 -2034/35 across London by tenure and size. The table sets the strategic context for Local Plan preparation. The figures show London-wide requirements for housing; in proportional terms their composition will vary between local areas. These will be identified through sub-regional and local SHMA and be addressed in local plans.

¹⁸⁵ 1985 Housing Act, Part 11, Section 8, Periodical review of housing needs (1) Every local housing authority shall consider housing conditions in their district and needs of the district with respect to the provision of further housing accommodation.

¹⁸⁶ Planning Inspectorate 2014. Report to the Mayor of London by Mr A Thickett

¹⁸⁷ Mayor of London. The London Strategic Housing Market Assessment 2013 (SHMA). GLA 2014

Table 3.1: Net annualised housing requirement 2015/16 to 2034/35

	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%

3.1.12 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.

3.1.13 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), which helps explain why the SHMAs identified requirement for family homes is relatively high in the market sector and relatively low in the affordable sector.

3.1.14 Boroughs will need to consider if this assumption is appropriate for local and sub-regional SHMAs. In particular, boroughs are advised to consider the household representative rates that underpin the GLA’s household projections and the potential implications for household size (see Table 3.2). 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 3.2 shows projected annualised household growth by type of and number of children which boroughs may want to consider as part of their SHMA analysis¹⁸⁸.

3.1.15 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.

3.1.16 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 social 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 boroughs to assess this in their sub regional/ local SHMAs taking account of local circumstances.

¹⁸⁸ Borough level projections can be found at the GLA’s London Datastore - <http://data.london.gov.uk/dataset/2014-round-household-projections>

Table 3.2: 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

3.1.17 The Mayor's housing covenant 2015-2018 programme¹⁸⁹ supports a short term focus on delivering smaller properties at capped rent¹⁹⁰ to provide downsizing opportunities for those impacted by welfare reforms which encourage a better use of stock (see Part 4 – Affordable Housing).

3.1.18 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, LPA's 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.

3.1.19 To aid boroughs in carrying out their local level 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

¹⁸⁹ The Mayor's Housing Covenant- 2015-18 programme.

¹⁹⁰ Capped rent refers to affordable rent properties with a rent that is capped at 50% of market rent.

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 high, low and central scenarios, the latter of which was used to derive the main London SHMA results. To assist housing market partnerships that cross London boundaries the GLA has shared data 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.

- **Take account of market signals.** The NPPG requires that estimates of need should be increased if market signals indicate a significant affordability

problem. There is as yet no standard way to do this, but this is a particularly significant issue for many parts of London. Annex 2 provides affordability ratios for each borough. Where boroughs' affordability ratios are significantly higher than the London average, the SHMA must demonstrate how this has been captured in an increase in their overall need.

- **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 borough plans must seek to contribute to meeting that need as far as possible in line with the other policies of the Plan (see paragraphs 1.1.4-8 of this SPG).

- **Specific needs.** As well as overall need, SHMAs should assess the needs of specific groups – more detail is provided on this below.

3.1.20 The SHMA provides a strategic overview of the diversity and complexity of

London's housing requirements. The SHMA does not itself constitute policy or provide all the answers to policy issues. As outlined in Part 4 of this SPG (Affordable Housing), account also has to be taken of other factors, not least the viability of housing provision¹⁹¹ and the availability of funding for affordable housing¹⁹². 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

3.1.21 In line with paragraph 50 of the NPPF 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. The Mayor will, and boroughs should, engage effectively with these groups to get a proper understanding of their housing needs.

Private renting

3.1.22 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 2003/04¹⁹³. 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.

3.1.23 Government¹⁹⁴ and the Mayor support provision of more private rented homes. 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 (Policy 3.8B a1). 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 address distinct needs; be particularly suitable for certain locations (for example town centre intensification and transport nodes); as well as through development management.

3.1.24 Long term private rent schemes are those that have been purpose built as rental units and are subject to a covenant of, for example 15 years, which ensures the units will stay as private rent for at least this period (overall ownership may change over this period but the units must be retained by a single owner). Such schemes are beneficial in a number of ways, they: have the potential to accelerate delivery; can offer longer term tenancies/more certainty over long term availability; and can ensure high quality management through single ownership. Such schemes are strongly encouraged to sign up to the London rental standard.

3.1.25 Long term PRS is particularly suited to higher density development within or on the edge of town centres or transport

¹⁹¹ DCLG NPPF 2012 ibid para 173

¹⁹² Mayor of London LHS 2011 ibid

¹⁹³ DCLG English Housing Survey headline report 2013/14.

¹⁹⁴ HM Government. Laying the Foundations: A Housing Strategy for England (Housing Strategy). Chapter 4. DCLG, 2011 and NPPF How should the needs of all types of housing be assessed (accessed 22.01.2015).

nodes. Local policies requiring a range of unit sizes could be applied flexibly to long term PRS schemes in these locations to reflect demand and the distinct viability challenges faced by long term PRS, when competing with provision for market sale. Research has shown potential yields and investment risk can be significantly affected by increases in the number of large units within a scheme. The standards in Part two of this SPG provide flexibility to consider innovative designs where they meet identified need and are of an exceptional standard.

- 3.1.26 In addition, boroughs should recognise the distinct economics of the sector relative to mainstream market housing and take account of this when undertaking viability assessments for covenanted schemes (those schemes that are secured as private rent for a fixed period either through a covenant, a Section 106 agreement or other legal agreement). These distinct economics should also be taken into account when disposing of public land.
- 3.1.27 Where viability suggests traditional affordable housing products are unviable on covenanted schemes due to the distinct economics, developers and boroughs could consider including discounted market rent (intermediate rent) as the affordable offer. To be counted as affordable housing, the discounted market rent units would have to meet the NPPF definition of intermediate housing (see section 4.2) 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 intermediate dwellings. Some discounted market rented products qualify for mandatory CIL relief, even when not let by a local authority/private registered provider¹⁹⁵.

- 3.1.28 If 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 PRS, 'claw back' mechanisms should be included as part of the planning permission to recoup a contribution for affordable housing if homes are sold out of the long term PRS market. The claw back agreement could base the contribution amount on the level of affordable housing that would have been viable on the scheme if it was for traditional market sale or be based on an agreed proportion of the sale price of each property when it is sold. To encourage long term institutional investment, this claw back requirement could proportionately reduce over time and be waived for schemes that are kept in the PRS market for the longer term.
- 3.1.29 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.
- 3.1.30 Further support for PRS can be given through broad based spatial planning policies, whether these be in LDFs or through more specific, local housing and

¹⁹⁵ The Community Infrastructure Levy (Amendment) Regulation 2015 – amendment to Part 6 – exemptions and reliefs.

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 and to encourage institutional investment in the private rented sector¹⁹⁶.
- innovative approaches to capturing planning gain through use of covenants or other mechanisms to ensure the delivery of sub-market housing within institutional PRS developments
- maximising the potential of reforms to Real Estate Investment Trusts to attract investment

3.1.31 In addition to the measures in the London Plan, the Mayor has set out policies in his London Housing Strategy¹⁹⁷ 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 rent a year
- implement the London Rental standard to improve management standards, with a target to accredit 100,000 landlords and agents by 2016.
- lobby government to make payments of housing benefit direct to landlords who

are accredited

- promote the delivery of longer term tenancies on a voluntary basis.

Houses in Multiple Occupation (HMOs)

3.1.32 There are 21,000 mandatory licensable HMOs in London and an estimated 195,000 in total¹⁹⁸. Collectively, these 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 eg students, leading to concerns about the social mix of some localities. In London, by contrast, 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.

3.1.33 The London Plan (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 Directions¹⁹⁹ 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

¹⁹⁶ DCLG. Review of the barriers to institutional investment in private rented homes. DCLG, 2012

¹⁹⁷ Mayor of London. Homes for London: The London Housing Strategy 2014

¹⁹⁸ DCLG. Housing Strategy Statistical Appendix. Data returns for 2013/14. CLG, 2014

¹⁹⁹ See Article 4(1) of the Town and Country Planning (General Permitted Development) Order 1995, as amended

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.

3.1.34 As noted in para in 1.2.41, 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’.

New housing products

3.1.35 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’s), boroughs 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. 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 in areas of high public transport accessibility.

Priority for affordable family accommodation

3.1.36 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 households in London – almost 8% of total households compared with little more than 2% in the country as a whole. The problem is particularly acute in social rented housing. The Mayor has made a long-term commitment to meet the need for family sized homes identified in the SHMA. His overall approach is set out in the London Housing Strategy²⁰⁰.

3.1.37 The 2013 SHMA found a high requirement for market homes with three or more bed rooms (14,628), accounting for 63% of the total market requirement. The requirement for affordable homes

²⁰⁰ Mayor of London. Homes for London: The London Housing Strategy 2014

with three or more bedrooms is much lower (8,800), accounting for only 34% of the affordable requirement. It is important to note that this size mix depends crucially on assumptions around under-occupation. The base 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).

- 3.1.38 Local requirements are likely to vary significantly from the requirements identified at the London wide strategic level. Sub regional/ local assessments should be carried out to ensure boroughs have a clear picture of their local requirements within the context of London's overall need in order to inform local policies and individual planning applications. These sub regional/ local studies may wish to make different assumptions about the size of properties households will occupy (see para 3.1.12-19).
- 3.1.39 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. London Plan 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.

- 3.1.40 Part 4 of this SPG provides detailed guidance on the relationship between maximising overall affordable housing output (Policies 3.11 and 3.12) and, within this, addressing the priority the Mayor attaches to improving provision of affordable family housing (Policy 3.11 as well as Policy 3.8). In general terms, 'maximisation' alone would be likely to produce a large number of small, intermediate dwellings so a careful balance has to be struck between such an outcome and making provision for what are likely to be a smaller number of social/affordable rented family homes.

Accessible homes

- 3.1.41 Many Londoners require accessible housing to lead independent and dignified lives. There are around 180,000 households in London who require a home adaptation because of a disability of a household member²⁰¹ and while many older people are choosing to remain in their own homes for longer, around 10-15% of older people appear likely to want to move into specialist older persons housing²⁰². To address the shortage of accessible housing in London, as discussed in Part 2, 90% of new dwellings should meet Building Regulation requirement M4(2) 'accessible and adaptable dwellings' and 10% should meet Building Regulation requirement M4(3) 'wheelchair user dwellings' (which includes wheelchair

²⁰¹ Mayor of London SHMA op cit

²⁰² Cambridge Centre for Housing & Planning Research, Three Dragons, Land Use Consultants. (Cambridge et al) The role of the planning system in delivering housing choice for older Londoners. Report for the GLA. GLA, 2012

accessible²⁰³, and wheelchair adaptable dwellings). The Mayor's Housing Moves scheme can provide a way of ensuring the wheelchair accessible/adaptable homes are allocated to those who need them. Guidance on implementing Policy 3.8B c (accessible and adaptable dwellings) and Policy 3.8B d (wheelchair user dwellings) is provided in Part 2 of this SPG - quality.

- 6% of over 75s have a registerable eye condition²⁰⁷
- 23% of over 85s have dementia²⁰⁸.
- 51% of males and 74% of females over 85 are unable to manage at least one self-care activity²⁰⁹.

Older Londoners

3.1.42 While London is a 'young' city, it is expected to experience substantial growth in the population of older people²⁰⁴ – this has already begun to emerge as an issue in some boroughs, especially in Outer London. 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 131,000²⁰⁵ (see Figure 3.1).

3.1.43 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 (see Figure 3.2).

- 21% of over 65s have mobility impairments and this rises to 50% of females and 35% of males over 85²⁰⁶.

²⁰³ Building Regulation M4 (3) (2) (b) should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling.

²⁰⁴ Mayor of London. London Plan 2015. Para 3.50

²⁰⁵ Mayor of London. London Plan 2015.

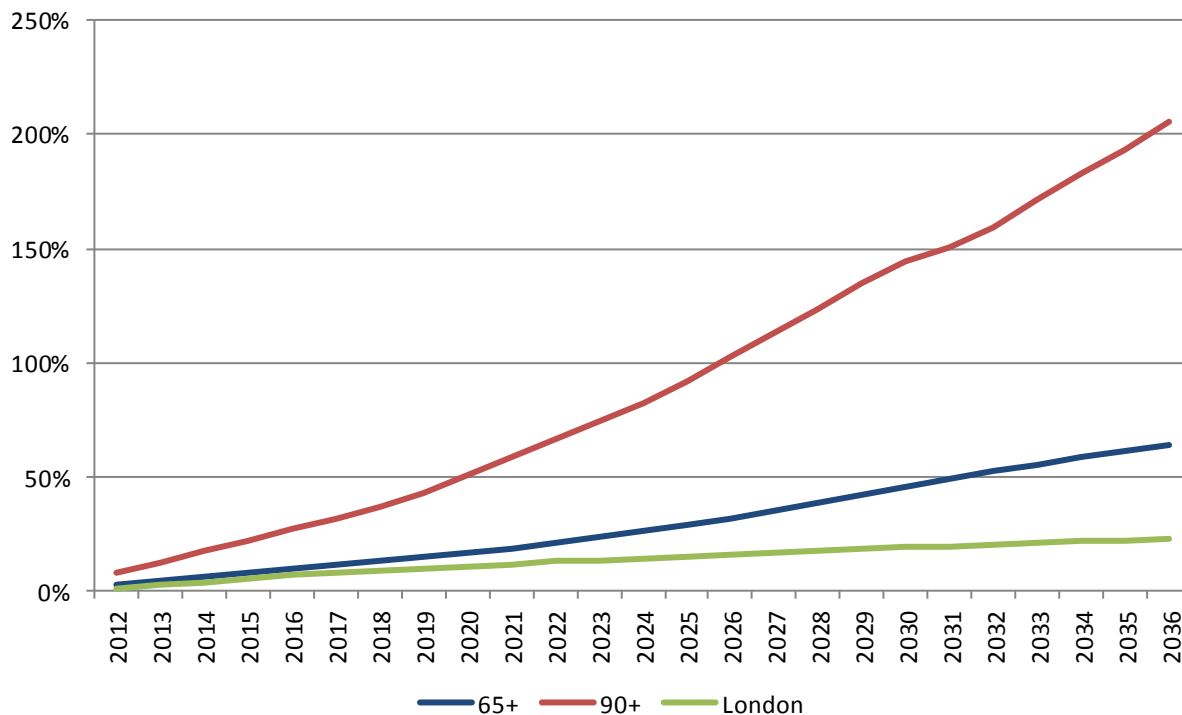
²⁰⁶ Projecting Older People Information System (POPPI) based on: National Statistics. Living in Britain. General Household Survey 2001, table 29

²⁰⁷ POPPI based on: Charles, Nigel. The number of people in the UK with a visual impairment: the use of research evidence and official statistics to estimate and describe the size of the visually impaired population, RNIB, July 2006

²⁰⁸ POPPI based on data from: Personal Social Services Research Unit (PSSRU) at the London School of Economics and the Institute of Psychiatry at King's College London, Alzheimer's Society. Dementia UK - A report into the prevalence and cost of dementia. PSSRU, 2007

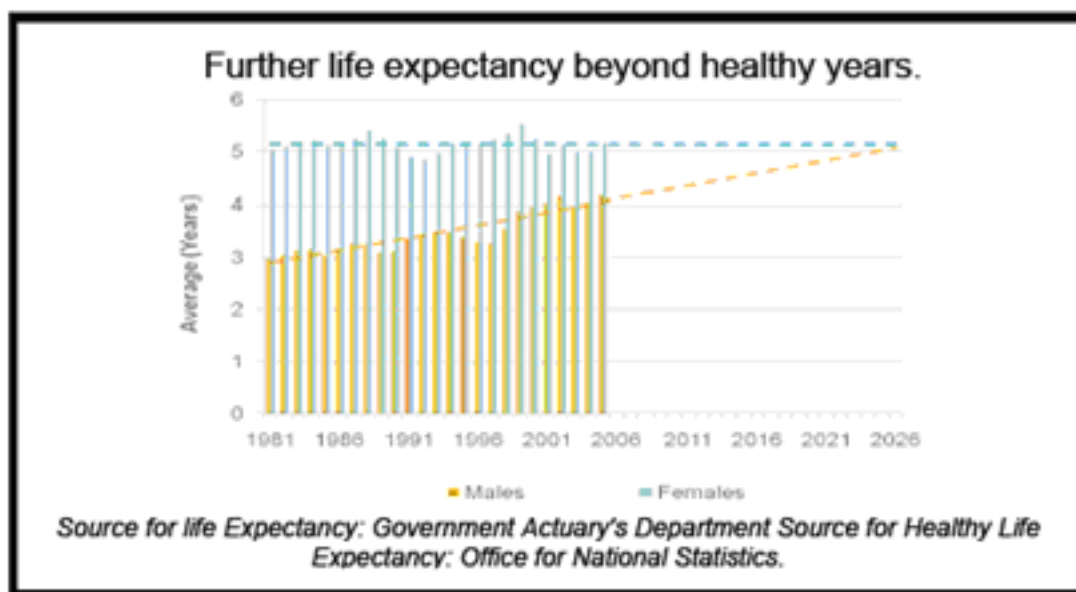
²⁰⁹ Self care activities defined as bathe, shower or wash all over, dress and undress, wash their face and hands, feed, cut their toenails, take medicines; Source: POPPI based on Living in Britain Survey 2001 *ibid*, table 35

Figure 3.1 Population growth – percentage increase by age group



Source; GLA 2013 round population projections–central scenario.

Figure 3.2 – Further life expectancy beyond healthy years



3.1.44 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 be delivered and how the best use of stock can be ensured. The London Plan Policy 3.8B e provides the basis for the planning system to contribute to wider initiatives addressing this change²¹⁰, recognising it is likely to become of greater importance over time and a continuing concern for future Plan reviews.

Types of provision

3.1.45 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 shows²¹¹ that the choices (see table 3.3 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.

3.1.46 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

3.1.47 For the majority of older people, remaining in their own home is their preferred choice²¹². The current requirement for 100% of homes to meet lifetime homes standards and 10% to be wheelchair accessible or easily adaptable for wheelchair users means that London's housing stock will increasingly be able to accommodate these needs as a matter of course. This will continue through the London-wide implementation of Building Regulation requirement M4(2) to 90% of on all new housing development and requirement M4(3) to 10% of homes (see Part 2 of this SPG).

3.1.48 As spatial rather than traditional land use plans, LDFs can draw on London Plan Policy 3.14 dealing with maintenance of the existing stock to complement non-land use initiatives which enable older people to stay on in their homes when they wish. This could include support through tele-care and integrated action by Home Improvement Agencies dealing with the improvements to the fabric of dwellings complemented by support from social and voluntary service providers²¹³.

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

²¹⁰ Mayor of London. London Housing Strategy 2014 op cit

²¹¹ 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

²¹² Lifetime Homes, Lifetime Neighbourhoods A National Strategy for Housing in an Ageing Society DCLG DoH DWP 2008

²¹³ National Housing Federation. Breaking the mould Re-visioning older people's housing. NHF, 2011

Table 3.3

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

- **Downsizer accommodation**
- **Senior co-housing**

Specialist housing (Use class C3) where planning policies to increase supply are likely to be required

- **Sheltered accommodation (also called retirement housing);** 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^A.
- **Extra care accommodation (also called close care, assisted living, very sheltered or continuing care housing);** 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.^B

Use class C2 – Residential institutions

- **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^C. Nursing homes include 24 hour medical care from a qualified nurse^D.

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

*Specialist in that it has an age restriction ^A Based on the Elderly Accommodation Counsel's definition of sheltered accommodation. ^B Based on information from the Elderly Accommodation Counsel and the NHS. ^C Based on the Elderly Accommodation Counsel's definition of residential/nursing care. ^D Care Quality Commission

redress isolation among older people. The Outer London Commission²¹⁴ suggests, and independent consultants confirm²¹⁵, that this makes town centre or edge of centre locations particularly appropriate for new, purpose built accommodation, especially for the active elderly. Private outdoor space standards set out in Part 2 of this SPG will help address concerns that higher density development in such places might make them unsuitable for this group.

- 3.1.50 In circumstances where older people choose to seek alternative, more tailored accommodation, LDFs can support housing management measures to reconcile specific as well as more general needs with existing provision. This can also help to address under-occupation, freeing up capacity for families. The London Accessible Housing Register²¹⁶ will give social landlords the tools to address this by providing standard categories of accessibility for all homes and help ensure the allocation process for these homes are more transparent. The Mayor's Seaside and Country Homes initiative can play a similar but more general role.
- 3.1.51 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.

Specialised housing and registered care accommodation for older people

- 3.1.52 Boroughs 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 provision²¹⁷.
- 3.1.53 Boroughs should also consider the aspirations of older people to understand the types of offer required to encourage downsizing, both to help free up underutilised family housing, but also to encourage older people to move when they are able.
- 3.1.54 An independent review²¹⁸ 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. Across the capital, provision of new specialist housing has been uneven; the 2014 update to the review²¹⁹ suggests that net new provision between 2010 and 2013 is as low as 339 homes over the three years. Moreover, 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

²¹⁴ Outer London Commission. Second Report to the Mayor. GLA, 2012

²¹⁵ Cambridge et al 2012 ibid

²¹⁶ <https://www.london.gov.uk/priorities/housing-land/renting-home/london-accessible-housing-register>

²¹⁷ DCLG NPPF 2012 ibid para 50, LP Policy 3.8B e.

²¹⁸ Cambridge et al 2012 ibid para 7.4

²¹⁹ Three Dragons and Celadine Strategic Housing. Report to the Greater London Authority. Assessing potential demand for older persons housing in London. March 2014

are home owners, local authorities should seek to encourage provision of a range of housing options which reflects the diversity of tenure amongst older households

- 3.1.55 The review 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 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 in care homes each year.
- 3.1.56 Annex 5 of the 2015 London Plan breaks these requirements down into indicative borough benchmarks²²⁰. This shows 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.

- 3.1.57 For some boroughs 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 person's accommodation. Local/ sub regional needs assessments will be able to analyse the dimensions of housing need in more detail.
- 3.1.58 Boroughs 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

²²⁰ 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.

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 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.

- 3.1.59 The closure of exiting specialist stock (chiefly in the affordable sector) 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.
- 3.1.60 Providing specialist housing for older people is not simply a planning issue. Planning for older people’s 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 issue²²¹.

Use class

- 3.1.61 There has been some debate over how to categorise specialist older persons accommodation in terms of the Use Class Order, not least because some boroughs only apply affordable housing policies to developments classed as C3. 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 Inspection²²²) 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.
- 3.1.62 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 some cases this may require some refinement to take appropriate account of the components of care and support 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 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,

²²² RTPI, Department of Health, Care Services Improvement Partnership. Extra Care Housing: development planning, control and management. RTPI Good Practice Note 8. RTPI, 2007

²²¹ London Assembly. Homes for Londoners. Building healthy homes for a comfortable and independent retirement. GLA, 2013

might appear to be an arbitrary and perhaps dated planning distinction.

3.1.63 However, neither should development proposals be categorised incorrectly (perhaps to avoid S 106 contributions which are normally expected of C3 development). It is understood that this situation may be further complicated by some boroughs seeking such contributions as a matter of course from specialist providers while others do not. In addition, some developments receive varying degrees of public funding, sometimes from a range of different sources, while others appear positively to eschew it. 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

3.1.64 Consultants report that because of the ancillary services and layout required for new specialist 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 are sufficiently sensitive to take these additional net costs into account. This may require 'bespoke' viability assessments (and, if necessary their independent validation) rather than application of, say, standard C3 charges or running a viability model as if the proposal was standard C3 housing. Consultants recommend that these costs should also be taken into account when setting local CIL charging schedules. As with housing generally, the Mayor

seeks to encourage rather than restrain development of specialist housing and, in line with NPPF requirements²²³, this requires a thorough appreciation of viability.

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

3.1.66 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.

²²³ DCLG NPPF 2012 *ibid* 173 - 174

3.1.67 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.

3.1.68 In coming to a view as to whether a proposal for specialist provision is acceptable in terms of paras 3.1.40 - 41 above, boroughs should bear in mind that consultants²²⁴ 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.

3.1.69 The Plan promotes mixed and balanced

²²⁴ Cambridge et al 2012 *ibid* Appendix 7

communities (Policy 3.9) to ‘foster social diversity, redress social exclusion and strengthen communities’ sense of responsibility for, and identify with, their neighbourhoods.’ This is particularly important to avoid older people becoming isolated from the wider community. Paragraph 3.60 of the Plan notes that ‘gated communities’ can reinforce exclusion, and should be resisted. Similar principles, including their application to tenure, should generally be applied within specialist developments for older people eg ‘retirement villages’ (London Plan paragraph 3.76).

3.1.70 The independent HAPPI Panel report²²⁵ 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 wellbeing for older people, and identifying planning policy approaches that encourage greater housing choice.

3.1.71 Boroughs may wish to consider effective ways of monitoring the provision of 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

²²⁵ Housing our Ageing Population Panel for Innovation (HAPPI Panel). *Housing Our Ageing Population Report*. HCA, DCLG, DoH, 2009

Communities with larger families

3.1.72 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 through incremental small scale as larger developments which foster social diversity, redress social exclusion and strengthen communities sense of responsibility for, and identity with, their neighbourhoods. They must be supported by effective and attractive design, adequate infrastructure and enhanced environment” (Policy 3.9 A). 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.

3.1.73 Different elements of these policies will have different expressions in different 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.

3.1.74 For example, a community’s desire to preserve and sustain its cultural identity through geographical clustering can lead to overcrowding, especially if the culture is associated with large families. Community clustering may also occur in areas with terraced or relatively dense semi detached properties, where opportunities to build new homes are limited. In the case of the latter, some may lack modern facilities and have firmly established street scenes and built forms that may pose challenges in extending and adapting properties.

3.1.75 Addressing the need for larger homes in publicly owned accommodation may be largely a housing management issue, though a planning input will be required if estate renewal and redevelopment is involved. Meeting the need for larger homes in established, predominantly private neighbourhoods is likely to require area based guidance to address the issues outlined above. As a starting

point, the borough SHMA may give a general indication of the need for larger homes in both types of area, but specific research may be needed to give a fuller appreciation of this, and to provide an initial indication of its geographical extent. More detailed fieldwork complemented by community engagement may well be required to define the neighbourhood for planning purposes.

- 3.1.76 Estimation of future needs may require translation of generic information on the needs of a particular community eg national or regional surveys, amplified and tested in the local context by field work and community engagement. House condition and environmental assessments may have to be undertaken in a similar way. These can then provide the context for design options eg different forms of loft or rear extensions in predominantly private neighbourhoods, and testing their environmental impact with the local and wider communities. Visualisation aids may be useful in this process, helping to identify a preferred option which can be owned by the local and wider community.

Supported housing

- 3.1.77 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 not just to meet the needs of an ageing population but also to address those of other groups which need accommodation based, supported care services such as hostels,

refuges and foyers as well as housing needs connected with particular types of occupation eg health workers, police and hotel staff.

- 3.1.78 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 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.
- 3.1.79 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.

Student accommodation

- 3.1.80 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 economy²²⁶. 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 Forum²²⁷ 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 over the 10 years to 2025, including the unmet demand, could be for 20,000 – 31,000 places.

- 3.1.81 The Plan's 20,000 place capacity for specialist student accommodation was identified as part of the Strategic Housing Land Availability Study. 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 accommodation is secured as such by planning agreement or condition relating to use of the land,

or to its occupation by members of specified higher education institutions, or an element of affordable student accommodation is provide (see paras 3.1.59). It is therefore monitored separately as part of overall housing provision (London Plan paragraph 3.53).

- 3.1.82 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 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.

Affordable student accommodation

- 3.1.83 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. This requirement is set out in paragraph 3.53B of the

²²⁶ For example: PA Consulting Group. Study London. The economic impact of international students to London's economy: a quantitative perspective. PA Consulting, 2011 and

⁹NS, Statistical Bulletin. Migration Statistics Quarterly Report No 10. ONS, 2011

²²⁷ 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/sites/default/files/Mayor%27s%20Academic%20Forum%20.pdf>

London Plan 2015, which states:

3.53B Student accommodation should be secured as such by planning agreement or condition relating to the use of the land or to its occupation by members of specified educational institutions. Where there is not an undertaking with a specified academic institution(s), providers should, subject to viability, deliver an element of student accommodation that is affordable for students in the context of average student incomes and rents for broadly comparable accommodation provided by London universities. Information on this will be provided through the Mayor's Academic Forum in the London Plan Annual Monitoring Reports. Guidance on how such accommodation should be defined, delivered and retained will be provided in Supplementary Planning Guidance.

3.1.84 The requirement for affordable student accommodation will apply when a provider of student accommodation does not have an undertaking (such as a nominations agreement) with a specified academic institution(s) that specifies that the accommodation will be occupied by students of that institution(s). Drawing on the recommendations of the Forum²²⁸, guidance is set out below on how affordable student accommodation can be defined, delivered and retained.

Definition of affordable student accommodation:

3.1.85 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?

3.1.86 For the purposes of the London Plan the average student income is based on the maximum income that a student studying in London and living away from home could receive from the government's maintenance loan and grant for living costs²²⁹, plus an additional amount to account for income from summer vacation work. This additional amount approximates to 9% of the income from the grant and loan. For example, in the academic year 2014/15 the maximum income a student studying in London and living away from home could receive from the maintenance loan and grant is £9,445; including 9% for summer vacation work would add £850 to make a total annual income of £10,295.

3.1.87 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; the short term nature of the time a person lives in student accommodation; and the average rent

²²⁸ 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.

²²⁹ Further information on the maintenance loan and grant can be found at <https://www.gov.uk/student-finance/loans-and-grants>

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 purpose built student accommodation. The affordable student accommodation rent must include the same packages of services and utilities that are included in the market rents rate.

- 3.1.88 To ensure the figure is up-to-date, the Mayor will publish the annual rental cost for purpose built student accommodation that is considered affordable for the coming academic year in his London Plan Annual Monitoring Report, based on the following formula:

Annual rental cost for affordable purpose built student accommodation in London \leq average student income* x 0.55

*Average student income equals the maximum student maintenance loan for living costs and the maintenance grant for living costs available to a UK full-time student in London living away from home, multiplied by 1.09.

- 3.1.89 Using the above formula the annual rental cost for affordable purpose built student accommodation in London for the academic year 2014/15 should be £5,662 or less. For a 38-week contract this equates to weekly rent of £149.

Amount of affordable student accommodation

- 3.1.90 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 2012/13²³⁰ and for London students the percentage was 33% in 2013/14²³¹).

- 3.1.91 To enable providers of purpose built student accommodation to maximise the delivery of affordable student accommodation by increasing the profitability of the development, boroughs may consider allowing the use of accommodation during vacation periods for ancillary uses. Such uses could include providing accommodation for 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

²³⁰ 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/694170/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>)

²³¹ 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_HESASStudents2015.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).

that the ancillary use does not result in a material change of use of the building.

Eligibility and allocation of the affordable student accommodation

- 3.1.92 Eligibility for the affordable student accommodation is based on a practical assessment of need. To be eligible for an affordable student room in purpose built student accommodation the students must be awarded a UK government funded maintenance grant for living expenses for the academic year they stay in the student accommodation.
- 3.1.93 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 allocation by HEI could be through a coordinated service such as that currently provided by the University of London Housing Service for intercollegiate halls.

Securing and maintaining the affordable student accommodation

- 3.1.94 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.
- 3.1.95 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 above formula. 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.

- 3.1.96 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.
- 3.1.97 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 purpose built student accommodation developments in their local plans, such as student bursaries. Local requirements may reduce the level of affordable student accommodation that is viable.

Gypsy and traveller provision

- 3.1.98 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 communities²³². 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, they are most effectively addressed at the local level in light of local circumstances by the agencies best placed to do this – the boroughs. Policy 3.8B I of the London Plan therefore requires boroughs to ensure these needs are identified and addressed in line with national policy²³³ and in coordination with neighbouring boroughs and districts as appropriate.

3.1.99 Government's objectives in this policy resonate with those of the Mayor and its guidance can be applied directly when determining planning applications, though boroughs do have flexibility to reformulate national policy in light of local circumstances.

3.1.100 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

3.1.101 The NPPF and the London Plan require boroughs to identify the number of people who wish to build their own home. The GLA is establishing 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.

3.1.102 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 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.

²³² Mayor of London, London Plan, 2015, GLA, paragraph 3.56

²³³ DCLG. Planning policy for traveller sites. CLG, 2012

3.2 MIXED AND BALANCED COMMUNITIES

3.2.1 Geographical segregation by income or tenure has the potential to undermine the Mayor's objectives of delivering improved housing choice and promoting social inclusion. Concentrations of rented affordable housing, increasingly rationed to the most needy, can compound the problems of deprivation and worklessness, while large parts of London remain dominated by owner occupied housing and are thus largely inaccessible to those on low incomes.

POLICY 3.9 MIXED AND BALANCED COMMUNITIES

Strategic

- A Communities mixed and balanced by tenure and household income should be promoted across London through incremental small scale as well as larger scale developments which foster social diversity, redress social exclusion and strengthen communities' sense of responsibility for, and identity with, their neighbourhoods. They must be supported by effective and attractive design, adequate infrastructure and an enhanced environment.

- B A more balanced mix of tenures should be sought in all parts of London, particularly in some neighbourhoods where social renting predominates and there are concentrations of deprivation

3.2.2 In recent years a greater proportion of new housing schemes have included a broad mix of affordable housing, but patterns of tenure segregation have not greatly changed because much affordable housing development takes place in areas with sizeable amounts of existing social housing.

3.2.3 The promotion of mixed and balanced communities requires a range of policies, including housing investment and management policies that go beyond the remit of planning. Others should be addressed through detailed design policies eg to resist gated communities (London Plan para 3.60) or to ensure that the appearance/form of development integrates rather than distinguishes tenures (London Plan para 3.76). Nevertheless, sensitive, local approaches to the tenure and dwelling size mix of new housing developments carefully combined with policy to maximise affordable housing have a crucial role to play.

3.2.4 In 2011, 60 per cent of wards in London were more than three quarters market housing (owner occupied and private rented), while only 6% of wards have more than 50% social housing. In 2001 census there were negligible levels of shared ownership homes identified, however, in 2011 shared ownership accounted for 3% of the stock. In total, half of London's affordable housing was concentrated in a quarter of its wards.

3.2.5 Boroughs should seek the maximum reasonable amount of affordable housing on each development, taking into account the full range of relevant factors specified in affordable housing policy,

including the existing tenure mix of the neighbourhood (see part 4 of this SPG).

3.2.6 Sites in neighbourhoods with significantly above the average proportion of existing social/affordable rented provision may be appropriate for a higher proportion of market housing and a higher proportion of intermediate housing provision in the affordable housing mix. Conversely, sites in areas with significantly lower levels of social rented housing than the average may be appropriate for a higher proportion of affordable housing provision (and a higher proportion of social/affordable rented housing within the overall affordable housing mix).

3.2.7 Tenure comparisons should be undertaken at a neighbourhood level. In some circumstances wards may provide the most suitable representation of a neighbourhood, in others a Middle Super Output Area (MSOA), or a small number of Lower Super Output Areas may provide the best approximation. The important point is that this analysis is undertaken at local/neighbourhood level and not across the borough as a whole. The 'neighbourhood' identified must reflect the local context and not be artificially constructed so as to skew the existing tenure mix.

3.2.8 The mix of social and intermediate housing on small to medium-sized sites should take account of the existing provision in the "natural neighbourhood" of the site, or the Middle Super Output Area or postcode sector in which it is situated. New developments of 500 homes or more should be large enough to 'set their own context'. They should therefore be able provide the basis for

more mixed and sustainable communities and should take account of the need to maximise affordable housing output, and within this recognise the priority attached to affordable family provision.

3.2.9 In developing local policies boroughs may wish to test the following benchmarks:

- promoting affordable housing delivery in neighbourhoods (defined by the most appropriate small area definition above) with more than three quarters market housing, using their full range of housing and planning powers (for example, encouraging purchase of existing homes for use as affordable housing), and
- promoting a lower proportion of affordable housing in neighbourhoods with more than fifty per cent affordable housing, while seeking no net loss of affordable housing floorspace (see estate renewal, Part 5).



PART 4

AFFORDABLE HOUSING

4.1 INTRODUCTION

4.1.1 This section provides guidance on implementing the housing policies in the London Plan to secure affordable housing. As the Plan makes clear, this is a particularly important issue for London. In June 2014, the average price of a market home was £499,000²³⁴ and lower quartile prices for market housing were 84% higher than in the country as a whole²³⁵, 56% higher than in the East of England and 34% higher than in the South East region. Buying a home is increasingly difficult for people on average incomes – in the late 1990s lower quartile home prices in London were four times those of lower quartile earnings; this has now risen to ten times²³⁶. Private rental costs are also very high in London – the average median monthly rent for a two bedroom home is £1,375- more than double the national median of £575/month²³⁷.

4.1.2 The GLA's SHMA²³⁸ shows that, regardless of short term cyclical changes in the housing market, affordability will remain a particular long term issue for London. Increasing overall output will help address the issue but provision of affordable housing to meet the wide range of needs among Londoners who cannot afford market housing will be

essential if Londoners are to have a genuine choice of homes.

4.1.3 In addressing this challenge the Plan is supported by the NPPF. The Framework's presumption in favour of sustainable development underscores not just the Plan's approach to increasing overall housing output by optimising development on individual sites, but also in the way it addresses the particularly pressing requirement to maximise affordable provision to "meet objectively assessed needs"²³⁹. The London Plan is clear that Local Authorities must seek to meet both local and strategic need. Combined with its emphasis on the quality of housing development, the London Plan's commitment to meeting affordable housing need also resonates with the Framework's imperative to triangulate social, economic and environmental objectives in support of sustainable development²⁴⁰.

4.1.4 Local plans "should use their evidence base to ensure (they) meet the full, objectively assessed needs for market and affordable housing in the housing market area as far as is consistent with" NPPF policies²⁴¹. Because London is a housing market area for planning purposes²⁴², 'full' needs here include those originating from outside as well as within a borough – an important consideration when tackling the challenges posed for affordable housing provision by an increasing population, a dynamic labour market and the need to foster mixed and balanced communities.

²³⁴ ONS House Price Index, June 2014 <http://www.ons.gov.uk/ons/rel/hpi/house-price-index/june-2012/stb-jun-2012.html>

²³⁵ Communities and Local Government. Housing Live Tables, <http://www.communities.gov.uk/housing/housingresearch/housingstatistics/livetables>, Table 583 (data q3 2012)

²³⁶ DCLG Housing Live Tables *ibid*, Table 576 2013

²³⁷ Valuation Office Agency. Private Rental Market Statistics. VOA, June 2014 <https://www.gov.uk/government/statistics/private-rental-market-statistics-england-only>

²³⁸ Mayor of London 2014. SHMA. *Op. cit.*

²³⁹ DCLG. National Planning Policy Framework (NPPF). CLG 2012 para 14

²⁴⁰ DCLG NPPF 2012 *ibid* para 7

²⁴¹ DCLG NPPF 2012 *ibid* para 47. See also para 159

²⁴² Mayor of London. London Plan 2015. para 3.15

4.2 DEFINITION OF AFFORDABLE HOUSING

POLICY 3.10 DEFINITION OF AFFORDABLE HOUSING

Strategic and LDF preparation

- A Affordable housing is social rented, affordable rented and intermediate housing (see para 3.61), provided to eligible households whose needs are not met by the market. Eligibility is determined with regard to local incomes and local house prices. Affordable housing should include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision.

Definitions

4.2.1 Affordable housing includes; social rent, affordable rent and intermediate homes for sale and rent. Detailed definitions are set out in the glossary of the NPPF and paragraph 3.61 of the London Plan as follows;

- **social rented housing** should meet the criteria outlined in Policy 3.10 and be owned by local authorities or private registered providers, for which guideline target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Mayor.
- **affordable rented housing** should meet the criteria outlined in Policy 3.10 and be let by local authorities or private registered providers of social housing to

households who are eligible for social rented housing. Affordable rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).²⁴³

- **Intermediate** housing should meet the criteria outlined in Policy 3.10 and be homes available for sale or rent at a cost above social rent, but below market levels. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rent²⁴⁴.

Social rented housing

4.2.2 In defining social rented it should be noted that privately rented housing can only exceptionally be considered as social housing, normally only where it is operated under an accreditation or licensing scheme where tenants are either nominated by the local authority or under a framework of priorities agreed with it. Agreements should also be in place to ensure that it is available at an affordable price for future eligible households in line with the NPPF.

4.2.3 The following should not be considered social housing for planning purposes, although each may be a valuable part of the overall housing stock:

- Rented housing which is not available on the basis of housing need, and is allocated on the basis of other criteria (such as the employment function of

²⁴³ DCLG. National Planning Policy Framework (NPPF). DCLG, 2012

²⁴⁴ It should also be noted that being a Local Authority or a private registered provider is not a requirement to deliver intermediate dwellings.

members of the household).

- Housing provided on a temporary basis.

Affordable rent

- 4.2.4 In April 2011 government introduced a new affordable rent product, intended to meet the same housing need as social rent. To fully reflect the introduction of affordable rent and the new definition of affordable housing in the NPPF, the Mayor consulted on Revised Minor Alterations to the London Plan in 2012. These amendments were published in October 2013 and are fully integrated in the 2015 London Plan.
- 4.2.5 Affordable rent was introduced to facilitate the continued delivery of affordable housing in the context of significantly reduced capital funding from government. The definition of affordable rent states that affordable rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges). As the London Plan states, in practice rents will vary for each scheme, with rents set by agreement between developers, providers and the Mayor through his housing investment function. The Mayor's London Housing Strategy states that affordable rent levels should not exceed the Local Housing Allowance for the property type and area concerned. In respect of individual schemes not funded by the Mayor, the London boroughs will take the lead in conjunction with relevant stakeholders, including the Mayor as appropriate. In all cases particular regard should be had to the availability of resources, the need to maximise provision and the principles set out in policies 3.11-3.12 of the Plan.
- 4.2.6 For the 2015-2018 investment round, the affordable rent product has been effectively divided into two products; a lower 'capped' rent product aimed at those most in need and a 'discounted' product which is aimed at low income working Londoners. More information can be found in the Mayor's Housing Covenant 2015-18 Programme. This approach will help address concerns over the working of the product in the context of the total benefit cap.
- 4.2.7 For planning purposes, site by site flexibility and scope to address a wide range of needs, including those of families who require homes at lower rents (the priority group), are essential if the affordable rent product is to function effectively as intended. This will be compromised if general local rental or income thresholds are introduced to control operation of the affordable rent product as described above eg to seek to focus it just on meeting the needs of particular income groups or to cap maximum rents at levels below 80%.

Maximising social/affordable rent.

- 4.2.8 While grant funding for rented housing is now predominantly targeted at affordable rent, boroughs can still support the provision of social rent, or affordable rent at around target rent levels through the application of their own resources eg their own land or funds. Before doing so they should consider whether they will be securing the best outcome in terms of numbers and range of units in line with the requirement to maximise output in terms of London Plan Policy 3.11 and paragraphs 4.3.2 – 4.3.28 of this SPG.
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4.2.9 Boroughs should ensure that schemes deliver the maximum reasonable affordable housing potential (within the context of policies 3.3, 3.8, 3.11 and 3.12) and must ensure that in developing policies and making planning decisions they reflect the investment potential of affordable rent. Boroughs should not restrict its use by putting in place policies requiring specified proportions of social rented housing or specified rental levels which will constrain realisation of this potential. Boroughs are strongly advised not to support proposals solely for social rented housing where such provision will not realise the maximum reasonable affordable housing potential of a site (within the context of policies 3.3, 3.11 and 3.12). A more flexible approach, combining affordable rent and, where appropriate and viable, social rent, will in almost all cases better realise development potential for affordable housing.

Nominations

4.2.10 For affordable rented homes funded through certain GLA programmes, five percent will be let on a pan-London basis, increasing to ten percent on strategic sites. This will be enforced through contracts with Registered Providers of affordable housing. Boroughs should avoid requiring 100% nomination rights in section 106 agreements as this could preclude the scheme from delivering affordable rented homes that are subject to pan-London nominations. Instead, Section 106 agreements should be drafted with a view to maximising the delivery of affordable housing including affordable rented homes.

Intermediate housing

4.2.11 For planning purposes, intermediate housing can include a wide range of products such as shared ownership, shared equity, sub-market rent (also known as intermediate rent or discounted market rent) and market provision for outright purchase such as low cost homes for sale, providing the above planning criteria are met. Intermediate products can be offered by a range of providers and are not restricted to local authorities and registered providers. The Mayor's London Housing Strategy²⁴⁵ gives further advice on the range of intermediate housing products, including the First Steps housing scheme.

4.2.12 In ensuring that products are properly accounted as affordable housing, boroughs should test the associated housing costs against comparable market products, taking into account size, quality and location. Boroughs should also consider the extent to which they meet each of the affordable housing definition criteria outlined above and set out in paragraphs 4.2.14-4.2.15 below). As noted below (paragraphs 4.2.22), some schemes may meet these criteria, but be secured by novel mechanisms such as covenants devolving from S106 agreements which effectively depress the re-sale value relative to otherwise comparable homes. If such mechanisms are robust over the long term in addressing both the affordable housing definition tests and broader affordable housing provision objectives they may be as acceptable as more conventional mechanisms e.g. 'pure' S106 agreements entailing Registered Provider partnership.

²⁴⁵ Mayor of London. Homes for London . The London Housing Strategy. June 2014

- 4.2.13 London Plan paragraph 3.61 sets out the gross household income eligibility ranges for Intermediate housing in London. These ranges are updated in the Annual Monitoring Report to reflect changes in lower quartile house prices. For households which require no more than two bedrooms the pan London range is currently £18,100 - £71,000, and for households requiring more than two bedrooms the pan London upper limit is £85,000. As paragraph 3.62 of London Plan 2015 states, eligibility criteria may be set locally to recognise the characteristics of local housing markets. However, local criteria should not compromise Policy 3.11 to maximise affordable housing provision and they should be set within the London Plan ranges and should be removed where properties remains unsold/unlet for three months (see paragraph 4.2.17).
- 4.2.14 For the products to be considered affordable, annual housing costs, including mortgage payments (assuming reasonable interest rates and deposit requirements- see para 4.2.15 below), rent and service charge, should be no greater than 40% of net household income, based on the household income limits set out in the AMR (currently £71,000 for one and two beds and £85,000 for three beds and above). This figure will be reviewed annually.
- 4.2.15 To ensure mortgage costs assumptions are reasonable, boroughs, developers and registered providers are advised to assume buyers will access a repayment mortgage, with a term of 25 years and a 90% loan to value ratio. The prevailing average interest rate being offered to lenders based on the terms above should be used to calculate the monthly payments.
- 4.2.16 Boroughs should ensure that intermediate housing provision is for households within the full range of incomes below the upper limit, and provide a range of dwelling types in terms of a mix of unit sizes (measured by number of bedrooms), bearing in mind the priority attached to provision of affordable family accommodation. Achieving this can be done through a range of measures and does not necessarily require setting local eligibility criteria. Any policies that set a local eligibility criteria should be robustly justified; with evidence to demonstrate that such a policy is viable and will not impede maximisation. Boroughs should also consider the potential unintended consequences of setting lower income limits, particularly in higher value areas. For example, access may become limited to those with recourse to large deposits.
- 4.2.17 Where boroughs choose to set local eligibility criteria for intermediate housing, including residency and place of work criteria as well as lower income thresholds, planning conditions or agreements should apply their criteria for no more than three months from the point of initial marketing. After this time, the units should be offered to those who meet the London-wide eligibility criteria. This is to provide certainty over lettings to providers and ensure that people on a range of incomes have access to intermediate products.
- 4.2.18 The Mayor is keen to promote intermediate products as they offer an opportunity for Londoners to meet their housing needs and aspirations. Imposing
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different income criteria at the borough level makes understanding and accessing the products harder for prospective buyers and tenants. Moreover, London operates as one housing market and areas of housing search are rarely constrained by borough boundaries. A London wide eligibility criteria applied on a consistent basis at local level could assist in 'mainstreaming' intermediate housing and help those eligible better understand and access this type of tenure.

4.2.19 The 2015 London Plan states that local eligibility criteria can also be applied to re-lets and re-sales for three months, following which they should be offered to anyone who meets the London wide eligibility criteria. However, boroughs should be mindful of the terms of typical shared ownership leases (which usually only restrict sale to eligible households for eight weeks) and should resist imposing restrictions on resale through section 106 agreements that are more onerous than typical leases as such restrictions could have implications for mortgage access and the long term operation of the product.

4.2.20 Extension of the upper income limit for intermediate housing to £85,000 for larger homes reflects the importance the Mayor attaches to meeting the needs of families given the particular challenges of affordability in London described earlier. These mean the household income eligibility threshold for intermediate housing has to be higher than in surrounding areas if Londoners are to have "a genuine choice of homes that they can afford and which meet their requirements for different sizes and

types of dwellings in the highest quality environments" (Policy 3.8 A).

Range of intermediate products

4.2.21 To date, shared ownership products have made up the bulk of London's intermediate offer. However, this does not mean that boroughs, developers and providers should be restricted to shared ownership. For example, intermediate/ discounted market rent could play a greater role in meeting the needs of Londoners in the future, as could other products that are emerging. Boroughs, developers and providers are encouraged to develop and consider innovative forms of intermediate housing which can meet the needs of eligible households; which are viable in London and which meet the definitions of affordable housing set out in the Plan and the NPPF. It should be noted that, based on the NPPF definition, intermediate products can be delivered by a wide range of providers, not only registered providers and local authorities.

Low cost market housing

4.2.22 In line with national guidance, the Plan's definition of affordable housing excludes "low-cost market housing", but the Mayor recognises that in some circumstances such housing can nonetheless form a useful part of overall housing mix. It should not be confused with "low cost homes for sale" which will be accounted as intermediate housing if they are below market price for comparable homes and meet the criteria for affordable housing – that is, are affordable within the context of the London Plan income ranges as set out

above and include provisions to remain at an affordable price for future eligible households or for the subsidy to be recycled.

Ensuring affordable provision for the future

- 4.2.23 Boroughs should seek to ensure that affordable housing provision is secured for future eligible households through a legal agreement. Provision of social/affordable rented housing through a housing association or cooperative registered with the Mayor, with rent levels consistent with the appropriate rent regime, will normally achieve this objective.
- 4.2.24 Schemes funded by the Mayor will also need to meet his investment criteria. Intermediate products delivered by ‘non-registered providers’ must be secured through a Section 106 agreement; which provides for the recycling of any subsidy²⁴⁶ for alternative affordable provision in the event of the affordable unit being lost.
- 4.2.25 Where no public funding is involved, and where provision is outside the specific requirements set in a S106 agreement, shorter fixed periods may be considered, subject to a minimum of 15 years. This may apply, for example, to accommodation developed above retail premises, or in relation to specific private financing arrangements. This should however only be applied where:

- a robust justification relating to the details of the particular case can be demonstrated, AND
- where provision of affordable housing would not otherwise be made, AND
- not be an alternative to the normal planning requirements applying to residential led schemes.

Student housing

- 4.2.26 As noted in Part 3 of this SPG, student housing should not be considered as affordable housing. It is not permanent housing and is only provided on the basis that an occupier is a member of an educational institution. The provision of purpose built student housing should be monitored separately from the provision of affordable housing and should not be counted against targets for affordable housing– see paragraph 3.53 of the London Plan. Similarly, where a development is solely for student housing, subject to para 3.53B of the London Plan it would not normally be appropriate for the borough to seek social rent or intermediate housing provision through a planning obligation. However, accommodation which is affordable for students outside the provisions of London Plan affordable housing policy may be required (see Part 3 para 3.1.83).

Key worker provision

- 4.2.27 The planning definition of intermediate housing relates to affordability in terms of the NPPF and not to employment status or function of individual household members. Housing cannot be defined as “affordable” simply because it is made available to a particular occupational group. However, the NPPF does identify a range of groups whose housing needs

²⁴⁶ For the avoidance of doubt, subsidy includes all forms of subsidy that are required to enable the sale or letting of the property at less than market value, this includes, among others; subsidy from reduced land costs and section 106 agreements as well as grant funding.

should be addressed in local plans.

4.3 AFFORDABLE HOUSING TARGETS

- 4.3.1 To provide more specific guidance on the scale of affordable housing requirements, the Plan uses an absolute rather than a percentage based overall target.

POLICY 3.11 AFFORDABLE HOUSING TARGETS

Strategic

- A The Mayor will, and boroughs and other relevant agencies and partners should, seek to maximise affordable housing provision and ensure an average of at least 17,000 more affordable homes per year in London over the term of this Plan. In order to give impetus to a strong and diverse intermediate housing sector, 60% of the affordable housing provision should be for social and affordable rent and 40% for intermediate rent or sale. Priority should be accorded to provision of affordable family housing

LDF preparation

- B Boroughs should set an overall target in LDFs for the amount of affordable housing provision needed over the plan period in their areas and separate targets for
 social/affordable rented; and
 intermediate
 Housing and reflect the strategic priority accorded to provision of affordable family housing and to making the best use of available resources to maximise affordable housing output.

- C LDF affordable housing targets should take account of:
- a current and future housing requirements identified in line with Policies 3.8, 3.10 and 3.11
 - b the strategic targets and priority accorded to affordable family housing set out in section A above
 - c the approach to coordinating provision and targets to meet the range of strategic, sub-regional and local affordable housing needs in London set out in Policy 3.8, paragraphs 3.65 - 3.67 and Supplementary Planning Guidance and the Mayor's London Housing Strategy
 - d the need to promote mixed and balanced communities (see Policy 3.9)
 - e capacity to accommodate development including potential sources of supply outlined in para 3.67
 - f the viability of future development, taking into account future resources as far as possible.
- D Affordable housing targets may be expressed in absolute or percentage terms in light of local circumstances, reflecting the priorities in 3.11 A-C above, the borough's contribution towards meeting strategic affordable housing targets in light of the framework set by the Plan and guidance in SPG. They should also provide a robust basis for implementing these targets through the development management process.

The strategic 17,000 affordable homes target

4.3.2 Paragraph 3.64 of the Plan outlines how its 17,000 affordable homes target was derived. In light of government guidance, it takes account of the range of factors relevant to setting a realistic and robust target and has been tested through the examination process. While there is scope for refinements to take account of distinct local circumstances where this can be justified on the basis of clear and robust evidence, boroughs may find the underpinning rationale informative in preparing their own affordable housing targets.

4.3.3 The Plan's target is primarily based on the GLA Strategic Housing Market Assessment (SHMA), which showed an average annual requirement for 25,600 affordable homes. The overall need figure of 49,000 identified in the London SHMA assumes that backlog housing need will be cleared over the lifetime of the Plan (20 years). If the backlog housing need was cleared over ten years it would increase the overall requirement to 62,000 homes a year. Because those in backlog need predominantly require affordable housing, meeting backlog in a shorter timescale mainly increases the affordable housing element of the requirement.

4.3.4 Following national guidance, in setting the 17,000 target, the Mayor took account of a range of factors bearing on delivery to come to a provision target striking an appropriate balance between realism and aspiration. While the Mayor has an ambition to meet London's housing needs in full, he has to take account of factors constraining him from

doing so. Of these factors, the availability of resources over the term of the Plan is of major importance. The NPPF is clear that Plans must be deliverable and viable, thus a target which does not recognise this would be found unsound and would be of little practical value in guiding and monitoring future output.

4.3.5 By adopting a yearly average the Mayor recognises that over 20 years annual output may go up as well as down. By using the 17,000 as a minimum target, linked to his commitment to 'maximise' output, the Mayor makes clear his ambition to address London's affordable housing needs; it is essential that it is not seen as a cap. Use of a percentage based target in this strategic context would not provide the same clear direction for policy, but the Plan does provide flexibility for Boroughs to propose such a target locally if it will help to maximise output (see paragraph 4.3.22 below). In addition, paragraph 4.3.24 discusses how fixed affordable housing percentages may be usefully applied to specific areas such as housing zones and opportunity areas.

The strategic 60% social and 40% intermediate affordable housing targets

4.3.6 The Mayor accepts that cases can be made for having higher targets for both social/affordable rent and intermediate housing. In providing policy direction at the broad strategic level of Policy 3.11 A, he has sought to recognise the affordable housing needs of Londoners as a whole. Policy 3.11C b provides flexibility for justified departures from these strategic guidelines to address distinct local needs and circumstances, which should be

based on clear and robust evidence so that general conformity with the London Plan's affordable housing policies can be demonstrated.

- 4.3.7 The affordable rent product is intended to address the housing need of those eligible for social rent. Given this, and that there is considerable overlap between affordable and social rented housing in terms of rent levels, affordable and social rent should be considered together. This approach has been tested and found sound by two inspectors through the EIP process²⁴⁷.
- 4.3.8 Ensuring the growth of the intermediate sector through the strategic 40% target will help more working Londoners meet their housing need and aspirations, including helping some get a first step on the housing ladder. Moreover, it can secure a more balanced mix of tenures in mono tenure neighbourhoods as well as extending the effectiveness of scarce public resources by opening up opportunities for partnership working with the private sector (Policy 3.9). There is significant potential for growth in the intermediate sector given clear demand for such products. When framing policies, boroughs should reflect not only the role intermediate products have in meeting a wide range of needs, but also its potential to increase build out rates on large sites (see paragraph 1.1.31). Further information is given in the Mayor's London Housing Strategy²⁴⁸.

The strategic priority for affordable family housing

- 4.3.9 The strong strategic priority (Policy 3.8B b, 3.11A, 3.11B b) the Mayor places on affordable housing provision for families stems from a range of factors: the roles of the private rented sector, and indeed of much private sector new development, in addressing the needs of smaller households; the concentration of families in London's 'backlog of housing need' made up of households who are homeless, overcrowded or who live in housing unsuited to their needs, and the high cost of larger market homes. The SHMA indicates that 34% of the future requirement for new affordable housing will be for homes with three or more bedrooms and the Mayor's 2014 housing strategy reiterates the priority to tackle overcrowding.
- 4.3.10 While taking account of the strategic policy for affordable family housing, in the short term, boroughs may want to consider focusing on the role one and two bed affordable units can play in meeting demand generated from benefit changes and to help encourage downsizing from under occupied family sized affordable units and therefore freeing up family sized affordable homes.

Assessing local affordable housing requirements

- 4.3.11 For planning purposes, London is a single housing market, rather than a collection of thirty three self contained borough ones. Indeed it can be seen as part of a market area that extends out into the wider south east. The London Plan recognises this, while acknowledging there is very considerable local variation

²⁴⁷ Planning Inspectorate 2013. Report to the Mayor of London by Mr G Salter. Planning Inspectorate 2014. Report to the Mayor of London by Mr A Thickett.

²⁴⁸ Mayor of London. London Housing Strategy op cit.

within it, and that these variations pay little heed to administrative boundaries. Supported by the Duty to Cooperate, especially across housing market areas²⁴⁹, and the strong emphasis the NPPF places on identifying (and addressing) the full range of needs²⁵⁰, the Plan stresses the importance of partnership working to develop a planning framework for housing delivery (including affordable housing), recognising the complexities of the market and providing scope for boroughs to respond positively to their own local circumstances. Policy 3.8 states “To inform local application of Policy 3.3 on housing supply and in taking account of housing requirements identified at regional, sub regional and local levels, boroughs should work with the Mayor and local communities to identify the range of needs likely to arise within their areas”. This is reinforced by Policy 3.11 C a/c which requires LDF affordable housing targets to take account of needs identified at all of these different levels (see Part 3 Choice).

- 4.3.12 In framing their local and sub regional SHMAs, boroughs are also advised to take into account their obligations under the 2012 Health and Social Care Act to work with Health and Wellbeing Boards to prepare Joint Strategic Needs Assessments to identify requirements for specialist and supported housing (see Part 3 - Choice).

Mixed and balanced communities and local affordable housing targets

- 4.3.13 Policy 3.9 promotes “communities mixed and balanced by tenure and household

income” and seeks “a “more balanced mix of tenures... in all parts of London particularly in some neighbourhoods where social renting predominates and there are concentrations of deprivation”. Policy 3.11C d indicates that development of local affordable housing targets should take this into account.

- 4.3.14 This has a bearing not just on the balance between private and affordable tenures, but also within the affordable tenure between social/affordable rent and intermediate products. As outlined in Part 3 of this SPG, in taking forward Policy 3.11 boroughs might, in the first instance, usefully draw on the Indices of Multiple Deprivation to identify neighbourhoods where there are strong correlations between deprivation and social renting, and consider the sorts and scales of tenure changes which might result in more balanced communities and provide practical opportunities to bring these about. Conversely, boroughs can use the Indices to identify where deprivation is relatively low and social/affordable rent housing under represented so that it can be encouraged (LP paragraph 3.59). The Plan makes clear that these are ‘essentially local matters for boroughs to address in the light of their local circumstances because the key concern is the concentration of deprivation in individual, or groups, of mono-tenure estates rather than the overall level of social renting in a borough’. The results of this local work can inform development of borough affordable housing targets and policy on how different types of affordable housing can support more broadly based communities as well as addressing need.

²⁴⁹ CLG NPPF 2012 ibid paras 179 - 181

²⁵⁰ CLG NPPF 2012 ibid para 47, 159

Housing capacity and local affordable housing targets

- 4.3.15 The Plan (paragraph 3.67) makes clear that “in order to maximise affordable housing provision boroughs should take account of the most robust available assessment of housing capacity including those identified in Policy 3.3” (the supply targets). Part 1 of this SPG explains that boroughs should seek to close the gap between housing supply and housing need. In addition, boroughs should ensure that their affordable housing target reflects their full capacity, including additional capacity identified in accordance with policy 3.3 E as well as their minimum supply targets in table 3.1.
- 4.3.16 In planning rather than housing investment terms, schemes for purchasing homes on the open market to turn into affordable housing will only count as additional provision where they are net new build completions, rather than a change of tenure of existing provision.
- 4.3.17 The Mayor will continue to monitor the range of affordable housing delivered through the housing starts and other data published through the AMR and the London Housing Strategy. Boroughs should draw on information from their own housing trajectories and other sources of information, including the results of on-going engagement with developers, land owners, registered providers and others involved in the local development process.

Viability issues and local targets

- 4.3.18 The NPPF places strong emphasis on ensuring the viability and deliverability of sustainable development: “the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. To ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing..... should, when taking 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 deliverable²⁵¹”. The importance of addressing this requirement has also been underlined in case law.
- 4.3.19 While a sound understanding of viability fundamentals and how they affect affordable housing delivery is essential, the limitations inevitable in making assessments of how this will change over the medium to long-term, particularly in abnormal market conditions mean that the requirements of national guidance cannot be applied in a mechanistic way.
- 4.3.20 The pan London SHLAA (which informed the affordable housing target) was subject to a strategic viability assessment²⁵² and the approach to developing the Policy 3.11 strategic affordable housing target also took into account resource availability and subsidy. While boroughs might usefully draw on work that underpins the London

²⁵¹ CLG NPPF 2012 *ibid* para 173

²⁵² Three Dragons, David Lock Associates, Trade Risk; 2013 GLA Strategic Housing Land Availability assessment. Viability Assessment. 2014

Plan to provide a context for their local responses to government requirements, they are advised not to rely on it solely. They might also consider local assessment methodologies prepared by other authorities which have been found sound through the planning process. As well as considering historic investment trends, boroughs are advised to draw on the strategic, short to medium term investment proposals in the London Housing Strategy and its delivery plans. They are also advised to have available for their EIPs evidence of how they engaged with developers and other partners in the local development process (on a one-to-one basis, through a 'call for sites', and through wider consultation over and above that undertaken in making their contribution to the pan London SHLAA, for example).

- 4.3.21 Boroughs are reminded that the Development Appraisal Toolkit (paragraphs 4.4.27 - 29 below), commissioned by the GLA and made available to boroughs, was also designed to support policy development work and its use may reduce the need for expensive consultancies (for example, to assess the viability of a representative sample of sites to inform development of a robust affordable housing target). The development costs and values in the Toolkit have been updated for 2015/16, but should be complemented by more local data. The Local Housing Delivery Group²⁵³ provides useful advice on a sample based, proportionate 'Existing Use Value plus' approach to assessing viability for policy development purposes. The Mayor does not agree with the view

put by the RICS²⁵⁴ and others that a Market Value based approach is the only acceptable basis for viability appraisal (see 4.4.28 of this SPG).

The expression of local targets

- 4.3.22 While the Mayor has set a strategic numeric target in the LP to clearly quantify the scale of future provision, at the local level either or both percentage and numeric targets can be useful – a numeric one to show the quantum of a borough's realistic ambitions (and to illustrate how it relates to London's overall affordable housing need), while a percentage can provide a convenient, and locally related starting point for negotiations on individual development proposals. This approach may be particularly useful given the introduction of the Government's vacant building credit (see 4.4.11) which requires boroughs to apply their affordable housing policy and then apply a reduction to this requirement based on the existing vacant building floor space on the site. Policy 3.11D and Plan paragraph 3.69 provide boroughs with the flexibility to express their targets in ways which are most effective in their own local circumstances.
- 4.3.23 The key points boroughs should bear in mind are that Local Plans must seek to meet their objectively assessed need for affordable housing (a national requirement) and the targets must reflect the Borough's contribution towards meeting the strategic London affordable housing target and provide a robust

²⁵³ Local Housing Delivery Group. Viability Testing in Local Plans. Advice for planning practitioners. LHDG 2012

²⁵⁴ RICS. Professional Guidance, England. Financial Viability in Planning. 1st Edition Guidance Note. RICS, 2012

basis for implementing this through the development control process. This means that the local target must be 'translatable' back into dwellings eg a local target based purely on, say, floorspace which cannot be translated back into dwellings to illustrate how the borough will contribute to achievement of the London-wide target would not conform with the intent of London Plan policy.

- 4.3.24 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 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).

The affordable rent product and target setting

- 4.3.25 **The 60/40 split:** government's definition of affordable rent (see section 4.2 above) makes it clear that it is intended to address similar types of need to traditional social rent. Thus, from a London-wide perspective, it is categorised as helping to meet the 60% social/affordable rent component of the

over-arching 17,000 affordable homes target. To conform with national and London Plan policy, boroughs should categorise it in the same way when setting their local expressions of the strategic 60/40 split in line with London Plan policy 3.11 and NPPF para 50.

- 4.3.26 It is important that local expressions of the 60/40 split do not arbitrarily compromise the purpose of having targets – to support maximisation of affordable housing output (Policy 3.11). Thus, the 60% target should not be used to cap provision of the affordable rent product. Similarly, the product should be used to achieve the Plan's policies to take account of "future resources as far as possible" (Policy 3.11) and "the availability of public subsidy" (Policy 3.12). In seeking to maximise output by setting a higher, local target than 60% in their LDFs, boroughs should demonstrate on the basis of clear and robust evidence that this would make the most effective use of affordable housing resources.
- 4.3.27 Despite the qualification of 'up to', the reference to 80% of market rent in the definition of affordable rent has caused concern that such a rent might be applied to all units in a scheme. It is stressed that that this is a nationally set maximum figure and will not apply to all schemes. For the 2015-2018 investment round, the affordable rent product has been effectively divided into two products; a lower 'capped' rent product aimed at those most in need and a 'discounted' product which is aimed at low income working Londoners. More information can be found in the Mayor's Housing Covenant 2015-18 Programme

and the Mayor’s Housing Strategy²⁵⁵. This approach will help address concerns over the working of the product in the context of the total benefit cap.

- 4.3.28 For the reasons given earlier (paragraphs 4.2.4 – 4.2.9), boroughs should avoid imposing any requirements through planning policy (such as borough level rent caps on rent levels for affordable rented housing) that might constrain operation of the affordable rent product, as this is likely to be counter-productive in terms of overall provision, and not justifiable in terms of general conformity with London Plan and NPPF policy.

4.4 AFFORDABLE HOUSING ON INDIVIDUAL SCHEMES

- 4.4.1 Negotiating affordable housing contributions on individual schemes requires the balancing of, sometimes competing, priorities including the national presumption in favour of sustainable development²⁵⁶, the Plan’s overarching requirement to maximise affordable housing output and the Plan’s priority to family provision. There is no ‘one size fits all’ solution, and each case must be addressed on its merits always bearing in mind the overall intent of policy. Experience has shown that there are some distinct considerations to be taken into account; some of these have been addressed in earlier sections of this SPG and are dealt with here only by cross reference (see paragraphs 4.3.11 – 4.3.12 on housing requirements, Part 3.2 and paragraphs 4.3.13 – 14 on social mix).

POLICY 3.12 NEGOTIATING AFFORDABLE HOUSING ON INDIVIDUAL PRIVATE RESIDENTIAL AND MIXED USE SCHEMES

Planning decisions and LDF preparation

- A The maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes, having regard to:
- a current and future requirements for affordable housing at local and regional levels identified in line with Policies 3.8 3.10 and 3.11 and having particular regard to the guidance provided by the Mayor through the London Housing Strategy, supplementary guidance and the London plan Annual Monitoring Report (see paragraph 3.68)
 - b affordable housing targets adopted in line with Policy 3.11,
 - c the need to encourage rather than restrain residential development (Policy 3.3),
 - d the need to promote mixed and balanced communities (Policy 3.9),
 - e the size and type of affordable housing needed in particular locations,
 - f the specific circumstances of individual sites,
 - g resources available to fund affordable housing, to maximise affordable housing output and the investment criteria set by the Mayor,

²⁵⁵ Mayor of London. Homes for London op cit

²⁵⁶ CLG NPPF 2012 ibid paras 7, 11 – 15, 49

h the priority to be accorded to provision of affordable family housing in policies 3.8 and 3.11.

- B Negotiations on sites should take account of their individual circumstances including development viability, the availability of public subsidy, the implications of phased development including provisions for re-appraising the viability of schemes prior to implementation ('contingent obligations'), and other scheme requirements.
- C Affordable housing should normally be provided on-site. In exceptional cases where it can be demonstrated robustly that this is not appropriate in terms of the policies in this Plan, it may be provided off-site. A cash in lieu contribution should only be accepted where this would have demonstrable benefits in furthering the affordable housing and other policies in this Plan and should be ring-fenced and, if appropriate, pooled to secure additional affordable housing either on identified sites elsewhere or as part of an agreed programme for provision of affordable housing.

Use of targets

4.4.2 In keeping with the general approach to affordable housing targets to maximise output and, within this, to address the priority for affordable family housing (see above), it is for boroughs to determine how they use their local targets in coming to a view on individual development proposals, within the framework of national and London strategic policy. However, the Mayor will, and boroughs are advised to go beyond

mechanistic application of the target alone in assessing the amount, type and size of affordable housing appropriate in a proposal. As the Plan makes clear, there are a range of other factors to be taken into account within the context of the overarching objectives outlined above.

4.4.3 While the local housing target can provide a useful initial 'ballpark' figure for negotiations, the Mayor will, and boroughs are advised to, take into account not only the factors covered in London Plan Policy 3.12 but also the preferred mix for the site, in terms of:

- tenure (between market housing, affordable/social rented housing and intermediate housing) having regard particularly to LP Policy 3.9 on securing mixed and balanced communities;
- density: higher density developments in town centre locations may not always be appropriate for households with children. Lower density schemes provide an opportunity to provide higher proportions of both social housing and intermediate family provision. However, housing requirements should generally determine mix, built form and density not vice versa;
- unit size;
- types of provision;
- maximising all available sources of public investment to deliver the optimum scheme profile – this is a particular important consideration with the new affordable housing investment regime and in maximising output and the potential of affordable rent to contribute to this on a scheme by scheme basis; and
- the view of the most appropriate scheme profile should be informed by boroughs' assessments of needs (taking account of

London's strategic needs) for different types of provision, including particularly the need for family dwellings, adjusted to reflect locational factors, social mix policy, London Plan and local policy on density and housing design and quality.

4.4.4 Registered Providers and their private development partners are strongly encouraged to work together (see para 4.4.21 below); to come to an early view on how their proposals maximise overall housing output on individual sites; and to engage with relevant housing/planning authorities on this prior to application²⁵⁷. In line with the London Plan, Boroughs should not refuse applications based on affordable rent rental levels proposed by a registered provider if they demonstrably maximise output in terms of Policy 3.12/ para 4.4.3 above.

4.4.5 Should proposals require further assessment to test whether they maximise affordable housing output/realise the full potential of affordable rent, iterative viability appraisals of possible mixes of units of different sizes may be required to identify the appropriate maximum output for a site.–

4.4.6 Should boroughs seek affordable housing types (eg social rented housing), which do not make the best use of the spectrum of available resources eg those available for affordable rent, they should assure themselves that they can maximise the affordable housing potential of a site using only their own resources. Boroughs are advised that other resources derived from the planning system eg from on-, or –off site developer contributions should

be focused on maximising output in the context of the range of sources available for affordable housing investment in line with Policy 3.12.

4.4.7 The calculation of the amount of affordable housing on a site is sometimes undertaken in terms of dwellings. However, there is generally a differential mix requirement for different types of provision – social/affordable rented housing, intermediate provision and market provision. Where the affordable housing categories involve dwellings with larger numbers of habitable rooms per dwelling, or different sizes of habitable rooms within different tenures, it may be more appropriate for the calculation of the affordable housing proportion to be in terms of habitable rooms or floorspace (see floorspace standards set out in Part 2 of this SPG). The affordable housing proportion should be calculated in relation to gross rather than net provision calculating the proportion of provision which is affordable, live/work units should be treated as housing provision to which an affordable housing requirement should be applied.

4.4.8 Where a borough has not as yet adopted a borough-wide target which is consistent with London Plan Policy 3.11 and national policy on affordable housing, it should nevertheless seek to obtain the maximum reasonable amount of affordable housing, having regard to the other factors set out in Policies 3.11 and 3.12. Local targets represent the average, long term objectives for affordable housing provision in a borough - they should not be used to 'cap' output in a particular year.

²⁵⁷ Also strongly supported by government. See CLG NPPF 2012 ibid paras 188 - 195

Encourage not restrain housing development

4.4.9 It is essential that an appropriate balance is struck between delivery of affordable housing and overall housing development. This can mean recognising that funded affordable housing can in itself enable rather than restrain mixed tenure development, as well as appreciating the view that affordable housing requirements may constrain overall output. Viability assessments can be particularly useful for boroughs and developers (see paragraphs 4.4.26-4.4.29) in considering whether affordable housing policy is restraining development and in showing how local targets can be applied in particular circumstances – a point strongly underscored by the NPPF²⁵⁸.

4.4.10 In Policy 3.12, the Plan provides a series of measures which can be used to encourage overall, as well as affordable, housing output including policy to make the best use of available housing resources, scope for 'off-site' provision in some circumstances and support for 'cascade' agreements and 'contingent obligations' to support the long term, phased implementation of affordable housing policy (see paras 4.4.34 -4.4.40). Underpinning this must be a commitment to partnership working between the borough, developer, registered providers and, where appropriate, the Mayor.

Vacant building credit

4.4.11 The Government is keen to promote brownfield development and has introduced the vacant building credit policy through a ministerial statement,

with guidance in the NPPG. This policy applies to sites where a vacant building is brought back into any lawful use, or is demolished to be replaced by a new building. As set out in the NPPG, in these circumstances the developer should be offered a financial credit equivalent to existing gross floor space when the local planning authority calculates any affordable housing contribution which will be sought. The NPPG sets out how the credit should be calculated.

4.4.12 This has particular implications for London, where 98% of development is already delivered on brownfield land in previous uses. The intention of the policy is to provide an incentive for brownfield development on sites containing vacant buildings that would not otherwise come forward for development. To ensure that the credit operates in a way that delivers the intention of the policy, boroughs are encouraged to set out in Local Plan policies when and how the vacant building credit will be applied. In line with the NPPG, boroughs should set out how they will assess if a building was made vacant for the sole purpose of redevelopment; this could include setting a minimum vacancy period and marketing requirement. In addition, local policy should be clear that the credit would not be applied to sites with an extant or recently expired permission.

²⁵⁸ CLG NPPF 2012 ibid para 173

Size and type of affordable housing in different locations

- 4.4.13 In determining the appropriate balance between social/affordable rented and intermediate provision on specific sites account should also be taken of:
- The site location in terms of community facilities: sites with limited access to existing or planned schools will generally not be appropriate for significant proportions of family sized housing. On larger sites, new community facilities will need to be planned in accordance with LP Policies 3.7 and 3.17- 3.20 (see also Social Infrastructure SPG).
 - The unit mix requirements for different affordable housing tenures: higher density developments in town centre locations may not be appropriate for households with children if adequate infrastructure/amenities cannot be put in place. Lower density schemes provide an opportunity to provide higher proportions of both social/affordable rent housing and intermediate family provision. However, housing requirements should generally determine mix, built form and density not vice versa.
 - Level of access to centres of employment should be taken into account to the extent this can clearly be shown to be relevant – ease of access to particular labour markets may justify a higher proportion of intermediate provision. However access to employment is also important for households in social housing and good public transport access can never be a justification for failing to provide a significant proportion of social housing within a scheme.
 - Sites in neighbourhoods with a proportion of existing social rented

provision significantly above or below the London average: see Part 3 and paragraphs 4.3.13 – 14) mixed and balanced communities

Offsite provision

- 4.4.14 The NPPF is very clear that local plans should set policies to meet identified need for affordable housing on site, unless off site provision or a financial contribution of broadly equivalent value can be robustly justified. Policy 3.12c and para 3.74 of the London Plan resonates with this stating that affordable housing should normally be provided required on site. In exceptional cases where it can be demonstrated robustly that it is not appropriate in terms of the policies in the Plan, it may be provided off-site. A cash in lieu option should only be accepted where this would have demonstrable benefits in furthering the affordable housing and other policies in this plan and should be ring fenced, and if appropriate, pooled, to secure efficient delivery of additional affordable housing on identified sites elsewhere or as part of an agreed programme for provision of affordable housing”. These exceptional circumstances include those where it would be possible to:
- secure a higher level of provision
 - better address priority needs, especially for affordable family housing
 - secure a more balanced community
 - better sustain strategically important clusters of economic activities, especially in parts of CAZ and the north of the Isle of Dogs where it might be part of a land ‘swap’ or ‘housing credit’ (Policy 2.11).
- 4.4.15 Consideration should only be given to off-site provision where an alternative

site or sites have been identified which would enable affordable housing provision more appropriate to the identified needs to be met and where the project is deliverable prior to the on site market development being completed. In calculating such provision equitably, and to secure mixed and balanced communities, boroughs should be mindful that the number of homes on the second site should be in proportion to the number of private dwellings to be provided on the original site in line with local targets. For example, and subject to viability appraisal, if the original proposal is for 100 units and the borough has an affordable housing target of 40% and 100 private dwellings are provided on the original site, then at least 67 affordable units should be provided on the second site. This means 40% of the total units (onsite provision plus offsite provision) are affordable. If the cost of provision on the second site is lower than on the original site then the number on the second site may be higher. Some boroughs have more sophisticated approaches than this to maximise affordable housing output and more sensitively recognise local land values and development costs.

- 4.4.16 Cash in lieu of exceptional off site provision should be held in a separate “affordable housing pot” – where resources can be pooled and ring fenced to enable more additional, or more appropriate, new provision to be made off-site, either on an identified site or as part of an agreed programme – in compliance with the statutory tests for use of planning obligations²⁵⁹. To

avoid incentivising off-site provision, agreements for this should be financially neutral in terms of the benefit to the applicant relative to on-site provision requirements. In London, funds held in these “pots” should be used to maximise affordable housing output by augmenting the range of other resources available for new affordable housing, including those for Affordable Rent.

- 4.4.17 Given the strategic importance of maximising affordable housing development in London, the Mayor does not consider it appropriate for boroughs to use cash in lieu of on/offsite affordable housing for any other purposes than maximising the delivery of additional affordable housing.

Funding affordable housing and development viability

- 4.4.18 The NPPF supports the London Plan in requiring proper account to be taken of the viability implications of applying strategic and local affordable housing policy: “to ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing should, when taking 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 deliverable²⁶⁰”. This is discussed in more detail in paras 4.4.19 – 4.4.36 below. In broad terms, boroughs must consider the economic viability of the preferred outcome, the potential of the value of the site to contribute to funding the cost of affordable housing provision and the

²⁵⁹ Community Infrastructure Levy Regulations 2010 (SI 2010 No 948), Regulation 122(2). Crown Copyright, 2010

²⁶⁰ CLG NPPF 2012 *ibid* para 173

availability of public subsidy to support affordable housing on the development. Where costs are relatively high, and/or sale values are relatively low, the potential for site value to support affordable housing provision may be limited. Conversely, where sales values are high, the requirement for direct subsidy may be limited as the required affordable housing output may be fundable primarily if, not entirely, from site value. Paragraph 3.37 of London Plan 2015 makes clear that developers should provide development appraisals to demonstrate that each scheme maximises affordable housing output.

- 4.4.19 **Nil grant:** regardless of site values, planning policies should not assume as their starting point that public sector investment is required simply because affordable housing is being delivered. Boroughs should at an early stage in the planning process make an assessment of the scope for provision of affordable homes without public subsidy, informed by a robust financial appraisal. Where a case is made for subsidy through use of a registered provider's resources, the borough should ensure that this investment results in a better outcome in terms of overall affordable housing output, tenure mix and/or bedroom size than a development without any public investment. The London Housing Strategy, backed by a separate delivery plan, provides detailed guidance on affordable housing investment across London for the short to medium term.
- 4.4.20 **Funding arrangements:** Since April 2012 the Mayor has funded registered providers to provide affordable housing. These may develop 100% affordable

homes schemes. Alternatively, on private development proposals above the affordable housing threshold (see Section 4.5 below), they must enter into agreements with developers for provision of affordable housing. These agreements will include details of the resources the provider will bring forward. Financial appraisal is central in ensuring that these resources, and any contribution made by the developer through planning obligations are used effectively, and that the maximum affordable housing output is achieved from a development consistent with the overall housing and other policies of the London Plan, and recognising the priority for affordable family housing.

- 4.4.21 **Development partners:** applicants for planning permission should, in conjunction with a registered provider when appropriate, submit appraisals to accompany their application (London Plan paragraph 3.71). Both developers and registered providers should have discussions with the planning and housing departments of the relevant borough and, where relevant for investment purposes, with the GLA at an early stage, and in advance of submitting an application or bid. It is advisable for such discussions to be project-specific, and to involve all parties on the basis of sharing site-specific information and appraisals. Such discussions should be undertaken for all schemes on private residential or mixed-use sites where public investment is sought.
- 4.4.22 Developers are advised that proposals made without registered provider partners for development on sites above local affordable housing site thresholds,

may raise conformity issues with national, strategic and local policy to maximise affordable housing output. To address this, boroughs may wish to advise private developers of appropriate Registered Providers operating within their areas, including consortia of small providers. However, it should be noted that, unlike social and affordable rent, intermediate products do not need to be provided by a local authority or registered provider.

4.4.23 Where the local authority, registered provider or other developer is seeking to include an element of market development within a project, this should be on the basis of providing a financial contribution to the affordable housing provision. There is no requirement for a registered provider led scheme to include an element of market provision, though in areas which are primarily existing social rented housing, such an option may contribute to the objective of achieving a more mixed or balanced neighbourhood. There is no restriction on any specific site providing solely affordable provision, though a mix of social/affordable rented and intermediate provision will normally be appropriate on larger sites, having regard to the tenure mix of the surrounding neighbourhood.

4.4.24 **Exceptions:** in most cases (see above), the priority will be to engage with registered providers to ensure the most effective use of available resources to maximise affordable housing delivery. Exceptions to the use of the full amount of available public investment should be limited to circumstances set out in paragraph 3.72 of the Plan where:

- 'on the highest value sites, at least the

maximum level of affordable housing which would normally be achieved with public subsidy can in fact be achieved by funding entirely from development value';

- 'some circumstances where "cascade agreements" are put in place to address uncertainties over the level of grant and amount of affordable housing to be delivered' (see paragraph 4.4.40 below); and
- 'types of provision which comply with the definition of affordable housing but are subsidised in other ways such as directly through discounted land sale, or indirectly if they offer exceptional benefits which on balance justify departures from some normal planning requirements'.

4.4.25 **Affordable Rent:** The Mayor intends to address the priority he gives to increasing provision for affordable housing for families in different ways in different parts of the capital. In a minority of cases, boroughs may be able to demonstrate that affordable family housing can be maximised most effectively through social rent using their own resources and land (effectively making it 'nil grant'). However, in most situations it is likely to be best achieved through affordable rent provision with GLA grant. S106 contributions secured through local application of Policy 3.12 (whether on-site contributions or 'pooled' off-site contributions) should be applied in ways that demonstrably maximise provision (particularly for families) in keeping with London plan and national policy. In coming to a view as to which type of approach generates

the “maximum reasonable amount of affordable housing”, boroughs and providers should take into account the range of factors in Policy 3.12 in light of guidance on their application set out above. In view of resource constraints, a key concern will be “availability of public subsidy” (Policy 3.12B) and making the best use of this.

4.4.26 **Viability appraisal:** in undertaking an economic viability assessment of a specific housing outcome, the 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 to the Community Infrastructure Levy (CIL) set by the Mayor (which is levied on private but not affordable housing). Account should also be taken of boroughs’ CILs.

4.4.27 The Development Appraisal toolkit²⁶¹ 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

review²⁶². In addition, the strategic values within the toolkit have also been updated for 2015/16. Boroughs are strongly advised to use more local information which reflects their local circumstances rather than these defaults. Boroughs are also advised to 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. Further details of the data sources and methodology are set out in the toolkit guidance notes²⁶³.

4.4.28 On a broader, conceptual issue, 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”²⁶⁴. In light of inference to the contrary²⁶⁵, either ‘Market Value’ or ‘Existing Use Value plus’ based approaches can address this requirement; their appropriate application depends on specific circumstances. On balance, the GLA has found that the ‘Existing Use Value plus’ based approach is generally more helpful for planning purposes and supports this approach.

4.4.29 The results of different types of viability appraisal can be bench-marked to the GLA Development Appraisal Toolkit²⁶⁶, and consideration should be given to the use of independent valuation advice.

²⁶¹ The GLA Development Appraisal Toolkit 2015 -Andrew Golland

²⁶² BNP Parisbas Real Estate. Development Control Toolkit Model – review of 2011 version. GLA, 2012

²⁶³ Mayor of London. GLA Development Appraisal Guidance Notes (2015). GLA, 2015

²⁶⁴ DCLG, NPPF, 2012, paragraph 173

²⁶⁵ RICS Financial Viability in Planning 2012 ibid

²⁶⁶ BNP Parisbas Real Estate 2012 ibid

Boroughs with limited staff resources may wish to prioritise significant schemes where grant may be required for full financial appraisals, rather than carry out full appraisals on all projects below the strategic referrals threshold.

4.4.30 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.

4.4.31 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 decision and the timetable for investment.

4.4.32 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.

4.4.33 **Freedom of information;** As noted above, the London Plan now makes clear that developers should provide

development appraisals to demonstrate that each scheme maximises affordable housing output²⁶⁷. A recent judgement has helped clarify the circumstances in which requests for details of such appraisals under freedom of information regimes may be upheld²⁶⁸. However, this judgment does not affect the requirement to supply this information where necessary to demonstrate that a scheme is maximising affordable housing.

Contingent obligations, review mechanisms and cascades.

4.4.34 To maximise affordable housing output on schemes with a long build out time and/or at times of economic uncertainty, the Plan provides support for the use 'contingent obligations'.

- *Contingent obligations/review mechanisms:* are used to maximise affordable housing output by putting in place provisions for re-appraising the viability of schemes or phases prior to implementation in whole or in part. Such provisions are sometimes incorrectly called "overage".

4.4.35 Contingent obligations provide a reappraisal mechanism which specifies the scope of a review of viability for each phase. The aim of a review mechanism is to address economic uncertainties which may arise over the lifetime of a development proposal. It allows increases in Section 106 contributions to reflect changes in the value of the development from application

²⁶⁷ London Plan 3.71

²⁶⁸ Warren NJ. First Tier Tribunal General Regulatory Chamber Information Rights. EA/2014/0122. RB Greenwich. 30th January 2015

to a specific point in time/stage of development. Review mechanisms should be based on the most robust data available, this generally will be the price paid for the completed unit.

Review mechanisms should be considered when a large scheme is built out in phases and the mechanism should specify the scope of a review of viability for each phase. 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 such as those arising from market uncertainty.

4.4.36 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.

4.4.37 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 a threshold level(s) of viability at which additional planning obligation contributions will be required;

- 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;

- agree the ‘profit split’ between the developer and borough once the threshold level of viability has been reached (this will depend on site specifics and timing of the review, but a 50/50 split is typical);

- 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) 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 (i.e. full rather than outline application), boroughs should take account of the potential practical implications of delivering increased amount of affordable housing on site.

4.4.38 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 required as part of the planning permission.

4.4.39 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;

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

Covenanted private rent

4.4.40 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. Where viability suggests that delivering covenanted PRS will deliver less than policy compliant levels of affordable housing, boroughs should consider including a 'claw back' mechanism in the section 106 which would allow affordable housing contributions to be recouped if the units are sold out of the long term PRS market (see paragraph 3.1.22-31).

Other scheme requirements

4.4.41 Paragraph 3.75 of the Plan makes clear that the design and quality policies of the Plan apply to affordable as well as market housing and stresses that affordable housing should be integrated with the rest of the development and have the same external appearance as other housing. More detailed guidance has been prepared on use of these standards for affordable housing investment purposes²⁶⁹.

²⁶⁹ Mayor of London. London Housing Design Guide. GLA, 2010

4.5 AFFORDABLE HOUSING THRESHOLDS

POLICY 3.13 AFFORDABLE HOUSING THRESHOLDS

Planning decisions and LDF preparation

- A Boroughs should normally require affordable housing provision on a site which has capacity to provide 10 or more homes, applying the density guidance set out in Policy 3.4 of this Plan and Table 3.2.
- B Boroughs are encouraged to seek a lower threshold through the LDF process where this can be justified in accordance with guidance, including circumstances where this will enable proposals for larger dwellings in terms of floorspace to make an equitable contribution to affordable housing provision.

4.5.1 The London Plan currently requires affordable housing to be delivered on sites that have capacity to deliver ten units or more and suggests that the unique circumstances of the London housing market justifies the setting a threshold lower than 10 dwellings. However, there is increasing concern that such requirements on sites of ten units or less could be constraining overall housing output, and in particular, preventing smaller builders from entering the market. Government have reflected this concern by introducing a threshold for affordable housing through a written ministerial statement and the NPPG. This states that affordable housing should not be sought on schemes of ten units or less (and where the floor space is less

than 1,000 square meters). When framing policies and assessing schemes boroughs should reflect government's most recent guidance on this issue.

- 4.5.2 As set out in LP paragraphs 3.77 and 3.88, but updated by the NPPG, boroughs should apply affordable housing requirements to all sites where there is a capacity to provide more than ten units.
- 4.5.3 Where smaller sites are infill developments in areas where owner occupation is predominant, the provision of affordable housing should be particularly encouraged and would be consistent with the objective of achieving a more mixed and balanced community.
- 4.5.4 In parts of London, especially the centre, demand for dwellings which are large in floorspace terms can mean that sites which would yield a larger number of average sized homes actually support fewer than this, taking them below the threshold for application of affordable housing policy. London Plan Policy 3.13 B and paragraph 3.78 make clear that in such circumstances affordable housing policy should apply. To work out whether a site would in fact support a higher number of dwellings and be subject to affordable housing policy boroughs may wish to draw on Table 3.2 (the density matrix) to estimate how many dwellings might usually be expected to be accommodated on a site in a particular type of location and compare this to what is being proposed. The size of the dwellings proposed can also be checked against the minimum floorspace expected for dwellings of particular types indicated in Table 3.3 (minimum space standards –

see also Part 2 of this SPG). In line with the NPPG, all developments of 1,000 square meters or more should be subject to affordable housing contributions.



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.

POLICY 3.14 EXISTING HOUSING

Strategic

- A The Mayor will, and boroughs and other stakeholders should, support the maintenance and enhancement of the condition and quality of London's existing homes.

Planning decisions and LDF preparation

- B Loss of housing, including affordable housing, should be resisted unless the housing is replaced at existing or higher densities with at least equivalent floorspace.
- C This policy includes the loss of hostels, staff accommodation and shared accommodation that meet an identified housing need, unless the existing floorspace is satisfactorily re-provided to an equivalent or better standard. The loss of housing to short-term provision (lettings less than 90 days) should also be resisted.
- D Boroughs should promote efficient use of the existing stock by reducing the number of vacant, unfit and unsatisfactory dwellings, including through setting and monitoring targets for bringing properties back into use. In particular, boroughs should prioritise long-term empty homes, derelict empty homes and listed buildings to be brought back into residential use.

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 vacants²⁷⁰. 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. However, boroughs should avoid double-counting, in line with national guidance²⁷¹. To incentivise local authorities to address vacant homes, New Homes Bonus funding can be secured where vacant properties are brought back into use.
- 5.1.3 Official DCLG statistics²⁷² show that vacancy across London is at an all-time low. Since 2004, the overall number of long-term vacant homes in London has halved, with these properties equating to only around 0.6% of London's total stock of homes in 2014²⁷³. In line with these trends, the SHLAA assumes that vacant properties returning to use will continued to provide a source of net housing supply in London to 2025²⁷⁴.
- 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

²⁷⁰ Homes which are vacant for over 6 months

²⁷¹ DCLG, Planning Practice Guidance, Paragraph: 040 Reference ID: 3-040-20140306

²⁷² DCLG Live Table 615: vacant dwellings by local authority district: England, from 2004

²⁷³ This compares 2014 DCLG dwelling stock estimates with long term vacant dwellings

²⁷⁴ Mayor of London, London Strategic Housing Land Availability Assessment, 2013, pages 73-74

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 which plays an important role in enabling development and economic growth. However, there is a perception that new build dwellings and existing homes in particular areas of London are being purchased by overseas buyers as investment vehicles and left empty. Research shows that whilst a high proportion of new build properties are being purchased by overseas buyers in 'prime London', 84% of these properties are either rented out or lived in as main residences, with 16% bought as second homes²⁷⁵. It should also be recognised that 'prime London' only accounts for around 8% of London's total housing market²⁷⁶. By comparison, around 93% of new build properties in Outer London were sold to UK residents between 2011 and 2013²⁷⁷. 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 developers²⁷⁸.

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 London²⁷⁹. 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 changes²⁸⁰ 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 required²⁸¹. Policy 3.14C should now be read in the context of 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

²⁷⁵ Savills Word Research, Spotlight: The world in London – capital appreciation, 2013, Uk Savills

²⁷⁶ Savills Word Research, Spotlight: The world in London – dynamics of a global city, 2014, Uk Savills

²⁷⁷ Knight Frank Residential Research, International Buyers in London, Knight Frank, 2013, page 3

²⁷⁸ Mayor of London, Mayoral Concordat on new homes for Londoners, GLA, 2014

²⁷⁹ Mayor of London, Homes for London: The London Housing Strategy, 2014, GLA, Section 2.7 – 2.8

²⁸⁰ Clause 44 of the Deregulation Act 2015

²⁸¹ Section 25 of the Greater London Council (General Powers) Act 1973

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. However, 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.
- 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 or strategic 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 (Policy 3.14C). Further guidance on housing provision for older people and other distinct groups is provided in Part 3 – Choice.
- 5.1.12 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.

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 or habitable rooms of affordable housing. The Plan provides flexibility to take into account local circumstances when considering individual proposals for estate renewal in terms of:
- 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 that is 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 cases, 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 Engagement with the existing community²⁸² should be an integral part of the estate renewal process. Though some upheaval may be inevitable in improving and increasing the stock, the impact of this can be minimised by taking

²⁸² HM Government Housing Strategy op cit paras 6.17 - 20

account of local residents' views and incorporating these in the phasing and management of renewal.

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.

POLICY 3.15 CO-ORDINATION OF HOUSING DEVELOPMENT AND INVESTMENT

Planning decisions and LDF preparation

A Boroughs should ensure that implementation of this Plan's long term, strategic housing policies are informed by, and integrated with, the short to medium term horizon provided by their own programmes and those of other relevant agencies including those arising from the Mayor's Housing, Economic Development and Transport Strategies, the London Plan Implementation Plan and arrangements for partnership, cross border and sub-regional working.

5.2.2 Policy 3.15 requires boroughs to ensure the 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), town centres (2.15) 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, the minimum housing provision targets identified in Table 3.1 of the London Plan and targets adopted in subsequent local plans should inform and shape other local or sub-regional strategies and investment programmes in relation to transport, housing, asset management, regeneration and economic development. The overall spatial approach of the London Plan to focus higher residential densities in opportunity areas, town centres and large brownfield sites should also 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. This underlines the need for all public bodies to work collaboratively to bring forward potential housing capacity on surplus public sector sites (see paragraph 1.2.29).

5.2.5 To support delivery, it is essential for planned housing growth to inform the short to medium term business plans of infrastructure delivery agencies, including private utilities companies, healthcare 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. Borough-wide Infrastructure Delivery Plans (IDPs) or more targeted area-based Development and Infrastructure Funding (DIF) studies should be prepared to highlight capital investment and phasing requirements, together with potential funding and delivery mechanisms. Scope to maximise the use of existing infrastructure and facilities through proactive asset management should be explored positively.

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. Local governance arrangements should ensure the effective prioritisation and allocation of CIL funding to support and accelerate housing supply. Regularly updated IDPs can inform this process.

- 5.2.6 Effective infrastructure planning is not a one-off process. Infrastructure assessments should be living documents which are regularly monitored, reviewed 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
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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. The overall provision of social infrastructure facilities will be needed to be enhanced to address these challenges.
- 6.1.3 Co-location of social infrastructure with new housing will be essential to meet demand, as will 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 life²⁸³. 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.
- 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.
- 6.1.7 The London Plan encourages boroughs to secure sites for the provision or reorganisation of infrastructure provision to meet identified requirements²⁸⁴. Boroughs should develop policies on

²⁸³ Mayor of London, London Plan, 2015, GLA, para 3.86 and glossary

²⁸⁴ Refer to London Plan Policies 3.16Db, 3.17Eb, 3.18Hb

social infrastructure provision within 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 planned 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 (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 accessibility of facilities is provided by TfL's Access to Opportunities and Services (ATOS) maps.

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 to infrastructure and services; and belong to a cohesive and diverse community. On a neighbourhood basis, new development 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 trends²⁸⁵. Forecasts show the number of pupils in London is also expected to increase substantially by 2017/18, generating a need to accommodate around 194,000 additional pupils²⁸⁶, with particularly high increases 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 year²⁸⁷.
- 6.2.2 Boroughs should promote a good supply and choice of quality school places, in line with their statutory duties²⁸⁸. This is particularly important in areas of current or forecast shortages and in parts of London with poor educational performance. 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).

- 6.2.3 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 90²⁸⁹. 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 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 may also provide scope to deliver new facilities to address existing or forecast demand. Boroughs should work closely with healthcare providers to identify local health related issues and 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

²⁸⁵ London Councils, Do the Maths 2014 – London school places challenge

²⁸⁶ London Councils, Do the Maths 2014 – London school places challenge, page 4

²⁸⁷ Mayor of London, London Infrastructure Plan 2050, GLA, 2014, page 70

²⁸⁸ Section 14 of the Education Act 1996 and Section 2 of the Education and Inspections Act 2006

²⁸⁹ GLA Intelligence, GLA 2013 round of trend based population projections, 2014, GLA, page 8

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 and can be 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 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.



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 NPPF²⁹⁰. 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 buildings²⁹¹. 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 3.1.A).

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 Isle of Dogs Opportunity Area. This is set out in Policy 4.3 of the London Plan, which is complemented Policy 2.11Aa. Guidance provided in this section should be read alongside these policies, together with those on offices (Policy 4.2), the CAZ (Policies 2.10-2.12), and the Mayor's Town Centres SPG

²⁹⁰ DCLG. National Planning Policy Framework (NPPF). DCLG, 2012 para 17, bullet point 9

²⁹¹ Mayor of London, London Plan 2015, para 4.15 and 4.17

and forthcoming CAZ SPG.

7.2.2 The London Plan's approach to providing mixed use development in the CAZ and Isle of Dogs reflects the role office and residential uses and values can play in developing and sustaining mixed use neighbourhoods. However, 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 Dogs²⁹². It is vital that this growth is accommodated to support job creation and ensure central business areas remain globally competitive. Proposals for new office floorspace often compete with increasingly high value residential developments for scarce sites in central areas. 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.

7.2.4 To manage potentially competing demands for residential and commercial development in central London a tailored policy framework is provided in Policy 4.3 of the London Plan:

- Within the CAZ and the north of the Isle of Dogs Opportunity Area, increases in office floorspace (or those above a justified local threshold) should provide a mix of uses, including housing, unless this would demonstrably conflict with other policies of the Plan (Policies 4.3Aa and 2.11Aa). When setting local thresholds, boroughs should consider raising these to a level which actively encourages office provision and renewal but still contribute towards housing provision and the delivery of mixed uses²⁹³.
- To address increasing residential values in central London and the pressures this can place on office floorspace provision, boroughs within the CAZ may:
 - ◇ provide protection for small-scale offices, under 500sqm (Policy 4.3Bc); and
 - ◇ require residential proposals which involve the loss of existing office floorspace to make a proportionate contribution to the provision of office space either within or nearby a development (Policy 4.3Bd).

7.2.5 Policy 4.3 of the London Plan states that local policies within the CAZ which protect small-scale offices or require the re-provision of office floorspace should be justified on the basis of local and strategic evidence of office demand and supply. They should be focused on specific locations where there is a particular need for local office provision. Further detailed guidance on the implementation of this policy approach will be provided in the CAZ SPG.

²⁹² Mayor of London, London Plan, 2015, GLA, Table 4.1

²⁹³ Mayor of London, London Plan, 2015, GLA, para 4.17A

Delivering mixed uses and housing on-site or nearby

7.2.6 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.

7.2.7 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 is underpinned by the use of land use 'swaps' and 'credits.'

Land use 'swaps' and 'credits'

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

7.2.9 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 requirements²⁹⁴.

7.2.10 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 outcomes²⁹⁵.

7.2.11 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 functions²⁹⁶. The Plan suggests swaps or credits may be used within and beyond the CAZ²⁹⁷. It supports the coordinated application of

²⁹⁴ Mayor of London, London Plan 2015, glossary page 393-394

²⁹⁵ Mayor of London, London Plan 2015, paragraph 3.74, final bullet

²⁹⁶ Mayor of London, London Plan 2015, paragraph 2.45

²⁹⁷ Mayor of London, London Plan 2015, paragraph 2.45

mixed use policies across local authority boundaries where this would support the broader objectives of the Plan²⁹⁸. 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 Plan, including policies which aim to:

- ensure the development of office provision is not strategically constrained in appropriate parts of the CAZ and provision made for a range of occupiers, especially strategically important financial and business services (Policy 2.10Ae);
- sustain strategically important, globally-orientated clusters of financial and business activity present within the City and the north of the Isle of Dogs (Policy 2.10Ac);
- meet the distinct needs of the central London office market, including the north of the Isle of Dogs, by sustaining and developing its unique and dynamic clusters of ‘world city’ and other specialist functions and business environments (Policy 4.2Ab);
- ensure development complements and supports the clusters of other strategically important, specialised CAZ uses including legal, health, academic, state and ‘special’ uses while also recognising the ‘mixed’ nature of much of the CAZ (Policy 2.11Ag); and
- sustain employment clusters at Tech City and City Fringe which lie within the CAZ (Policy 4.10Af).

Negotiating affordable housing provision through Policy 4.3

- 7.2.12 Residential units proposed either on or off-site to address the requirements of Policy 4.3Aa will be subject to London Plan policies on affordable housing. The maximum reasonable amount of 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. Further guidance is provided on the application of this policy in Part 4 of this SPG.
- 7.2.13 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 either: (a) through a swap or credit; or (b) where there is scope to accommodate housing on-site within a mixed use development.
- 7.2.14 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,

²⁹⁸ Mayor of London, London Plan, 2015, para 4.15

either on identified sites elsewhere or as part of an agreed programme for provision of affordable housing.

- 7.2.15 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 guidance²⁹⁹. 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 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 Panel³⁰⁰. Residential development is 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, although it may not be appropriate in business or science park locations, taking into account employment policies.

- 7.3.3 Likewise, housing as part of mixed use redevelopment will play an important complementary and enabling role in a number of the 'Strategic Outer London Development Centres' (SOLDCs) identified in Policy 2.16 of the London Plan, particularly those which have a specialist leisure, retail, tourism, arts/culture, higher education and office function. However, residential development is unlikely to be appropriate in SOLDCs which have an industrial focus. Further guidance is provided on SOLDCs within the Town Centres SPG, including implementation guidelines for

²⁹⁹ DCLG, NPPF, paragraph 173 and relevant sections of the NPPG on viability.

³⁰⁰ Outer London Commission. Third Report. GLA 2015 Ramidus Consulting, Roger Tym and Partners. London office policy review 2012. 2012 GLA.

specific locations³⁰¹.

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 Plan³⁰² and is suggested by the NPPF³⁰³ and national planning guidance³⁰⁴. 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 SPG³⁰⁵.

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.

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 businesses³⁰⁶ and in terms of London Plan Policies 4.10, 2.7 and 2.15 should be recognised³⁰⁷.

Office to residential permitted development rights

7.3.7 Government has liberalised permitted development rights for changes of use from offices to residential use. These provisions are in operation until 30th May 2016. Exemptions have been put in place for parts of London including the CAZ, the north of the Isle of Dogs, Tech City (City Fringe), Kensington and Chelsea and the Royal Docks Enterprise Zone. In addition, a number of boroughs have brought forward Article 4 Directions for selected locations which remove the permitted development rights for

³⁰¹ Mayor of London, Town Centres SPG, 2014, Appendix E

³⁰² Mayor of London, London Plan, 2015, GLA, policies 2.15, 3.3, 4.2 and 4.3

³⁰³ DCLG, NPPF, paragraph 22

³⁰⁴ DCLG, NPPG – Housing and economic development needs assessments; and Housing and economic land availability assessments

³⁰⁵ Mayor of London, Town Centres SPG, Section 1.3, 1.4, Chapter 2 and Chapter 6

³⁰⁶ URS and London Enterprise Panel, Supporting Places of Work: Incubators, Accelerators and Co-working Spaces. 2014

³⁰⁷ Mayor of London, Accommodating Growth in Town Centres, Chapter 4

change of use from office to residential. The impact of these changes is being monitored by the GLA in collaboration with the boroughs.

- 7.3.8 Typically, change of use from office to residential floorspace under permitted development rights can lead to sub-optimal planning outcomes when compared with the comprehensive redevelopment of surplus sites in terms of overall housing output³⁰⁸, affordable housing provision and design quality. Change of use from office to residential 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, regeneration and renewal. 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 stock, as contrasted with its conversion to residential use through permitted development rights.

Planning obligations for affordable business space

- 7.3.9 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. Town centres are some of the most accessible locations in London. Consequently, higher density housing provision in these locations 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.
- 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

³⁰⁸ The London Office Policy Review 2012, page 131, Table 8.2

structural challenges. Spatial variations are expected in terms of the impact of these changes depending on the size of centres, which are described in the Plan³⁰⁹.

7.4.3 Higher density residential redevelopment can have a number of positive impacts on town centre footfall, vitality and viability. 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 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 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, working closely with other public and private sector partners will be necessary (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.

Opportunities for housing intensification in town centres

³⁰⁹ Mayor of London, London Plan, 2015, GLA, paragraph 2.72D

7.4.6 Surplus retail and office floorspace will provide opportunities for housing intensification and mixed use redevelopment in town centres. The London Plan suggests that the planned 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 achieved. This will include surplus industrial sites within or on the edges of town centres.

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 rigorously 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 development³¹⁰. 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. Net benefits which can arise as a result of the provision of smaller units in relation to

³¹⁰ As recommended by London Plan Policy 4.7Cb and the Town Centres SPG

the existing stock of family sized homes should be considered. For example, the provision of smaller units can enable downsizing and may reduce pressures to convert existing family sized properties into flats. Further guidance on housing mix is provided in Part 3 – Choice.

- 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 concentrated³¹¹. 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 accessibility. 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 accessibility or where there are plans to improve public transport provision (Policies 3.3, 6.1). In many instances bus corridors beyond town centre boundaries also have high PTAL scores. Opportunities to optimise housing output along these routes should be fully realised, 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 robustly justified exceptional cases. Where this is appropriate will depend on particular local circumstances and should be rigorously assessed through the development management and plan-making process. This recognises that town centres with good access to public transport may be appropriate locations for tall or large buildings³¹² (Policy 7.7Ca), where their impact is fully considered and justified through a detailed urban design analysis. 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, 7.5, 7.6, 7.8).

7.5 OPPORTUNITY AREAS AND LARGE SITES

- 7.5.1 Opportunity areas cover the capital's major areas of brownfield land with substantial capacity to accommodate

³¹¹ Mayor of London, London Plan, GLA, 2015, paragraph 3.53A

³¹² Tall and large buildings are defined in paragraph 7.25 of the London Plan as those that are substantially taller than their surroundings, cause significant change to the skyline or are larger than the threshold sizes set for the referral of planning applications to the Mayor.

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 need³¹³. However, opportunity areas are not all about housing – up to 575,000 additional jobs are expected to be provided in these areas during the same period, helping to significantly boost economic growth in the capital and deliver mixed use neighbourhoods.

7.5.2 Policy 3.3 of the London Plan identifies 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 supply (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 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 supply³¹⁴. 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 housing densities³¹⁵. 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

³¹³ Mayor of London, London Plan, 2015, GLA, para 2.61

³¹⁴ Mayor of London, London Plan, 2015, GLA, paragraph 3.19

³¹⁵ Mayor of London, London Plan, 2015,, GLA, paragraphs 2.62 and 3.42

be taken into account when preparing plans or frameworks for large sites. As potential sources of substantial 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 provide a good quality public realm.

be 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. Further guidance on Policy 3.4 and instances where the density ranges may be exceeded in justified, exceptional circumstances is provided in Section 1.3 of this SPG.

Optimising housing output

- 7.5.6 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 infrastructure 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.
- 7.5.7 Densities in opportunity areas and on other large sites may exceed the relevant density range in Table 3.2 of the London Plan, subject to development achieving the highest standards in terms of residential and environmental quality. The extent to which this is possible will depend on anticipated infrastructure capacity, having regard to local character (Policy 3.4). The potential for higher levels of development to enable additional infrastructure capacity should

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. They are expected to be in place to 2025 and will play an important role in ensuring current rates 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 should aim to address identified barriers holding back housing delivery and 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 3.11 and 3.10). 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.

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.

7.6.5 A number of housing zones are likely to 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, renewal 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 social infrastructure utilities and transport requirements and the tenure mix the wider area. 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 (see Part 3 - Choice). This may 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 (see Part 2 - Quality) to address these requirements.

7.7 HOUSING AND SURPLUS INDUSTRIAL LAND

- 7.7.1 Historically, surplus industrial land has been a key source of new housing capacity. However, industrial land is a scarce and finite resource in the capital.

Pressure to accommodate London's increasing 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 policy³¹⁶ (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 essential industrial functions, logistics, waste and transport facilities, emerging new sectors such as green 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 SPG³¹⁷. 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.

³¹⁶ DCLG NPPF, 2012, paragraph 51

³¹⁷ Mayor of London. Supplementary Planning Guidance, Land for Industry and Transport. GLA, 2012. Roger Tym & Partners, King Sturge

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 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 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, this must be based on authoritative local and strategic evidence and should be managed and coordinated through local plans, area action plans or opportunity area planning frameworks (Policy 2.13). Smaller scale releases from SILs should not compromise the integrity and viability of the remainder of the SIL (Policy 2.17 C). 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 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.



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ANNEX 1

SUMMARY OF THE

PROPOSED CHANGES TO

THE QUALITY AND DESIGN

STANDARDS

EXISTING STANDARD		DRAFT STANDARD	REASON FOR CHANGE
1.0	Shaping Good Places		
1.1	Defining places		
1.1.1	<p>Development Proposals should demonstrate:</p> <ul style="list-style-type: none"> • 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. • how the scheme relates to the identified character of the place and 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. 	<p>Development proposals should demonstrate:</p> <ul style="list-style-type: none"> • 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. • 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. 	Unchanged
1.1.2	<p>Development proposals should demonstrate:</p> <ul style="list-style-type: none"> 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 extensive 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. 	<p>Development proposals should demonstrate:</p> <ul style="list-style-type: none"> d how the scheme complements the local network of public spaces, including how it integrates with existing streets and paths. e 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. f 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. 	Minor amendment (unrelated to the Housing Standards Review)

EXISTING STANDARD		DRAFT STANDARD	REASON FOR CHANGE
1.2	Outdoor spaces		
1.2.1	Development proposals should demonstrate that they comply with the borough's 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.	Development proposals should demonstrate that they comply with the borough's 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.	Unchanged
1.2.2	For developments with a potential occupancy of ten children or more, development proposals should make appropriate play provision in accordance with the LP SPG, Providing for Children and Young People's Play and Informal Recreation.	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.	Unchanged
1.2.3	Where communal open space is provided, development proposals should demonstrate that the space: <ul style="list-style-type: none"> a is overlooked by surrounding development; b is accessible to wheelchair users and other disabled people; c is designed to take advantage of direct sunlight; has suitable management arrangements in place.	Where communal open space is provided, development proposals should demonstrate that the space: <ul style="list-style-type: none"> a is overlooked by surrounding development; b is accessible to wheelchair users and other disabled people; c is designed to take advantage of direct sunlight; d has suitable management arrangements in place. 	Unchanged
2.0	Housing for a Diverse City		
2.1	Appropriate density		
2.1.1	Development proposals should demonstrate how the density of residential accommodation satisfies LP policy relating to public transport accessibility levels (PTALs) and the accessibility of local amenities and services, and is appropriate to the location in London.	Development proposals should demonstrate how the density of residential accommodation satisfies London Plan policy relating to public transport accessibility levels (PTALs) and the accessibility of local amenities and services, and is appropriate to the location.	Unchanged

EXISTING STANDARD		DRAFT STANDARD	REASON FOR CHANGE
2.2	Residential mix		
2.2.1	Development proposals should demonstrate how the mix of dwelling types and sizes and the mix of tenures meet strategic and local borough targets and are appropriate to the location in London.	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.	Unchanged
3.0	From Street to Front Door		
3.1	Entrance and approach		
3.1.1	All main entrances to houses, ground floor flats and communal entrance lobbies should be visible from the public realm and clearly identified.	All main entrances to houses, ground floor flats and communal entrance lobbies should be visible, clearly identifiable, and directly accessible from the public realm.	Minor amendment (unrelated to Housing Standards Review)
3.1.2	The distance from the accessible car parking space of requirement 3.3.4 to the home or to the relevant block entrance or lift core should be kept to a minimum and should be level or gently sloping.	The distance from the accessible car parking space of standard 3.3.4 to the home or to the relevant block entrance or lift core should be kept to a minimum.	Updated to reflect the new national technical standards.
3.1.3	The approach to all entrances should preferably be level or gently sloping.	Approach routes should comply with the requirements of Part M4(2) ¹ , unless they also serve Wheelchair User Dwellings, where they should comply with the requirements of Part M4(3) ² .	Updated to reflect the new national technical standards.
3.1.4	All entrances should be illuminated and have level access over the threshold, Entrance doors should have 300mm of clear space to the pull side, and clear minimum opening widths of 800mm or 825mm depending on the direction and width of approach. Main entrances should have weather protection and a level external landing.	All entrances should comply with the requirements of Part M4(2), unless they also serve Wheelchair User Dwellings, where they should comply with the requirements of Part M4(3).	Updated to reflect the new national technical standards.
3.1.5	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. 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.		This is a new standard and reflects the 2015 London Plan (Policy 7.3).

EXISTING STANDARD		DRAFT STANDARD	REASON FOR CHANGE
3.2	Shared circulation within buildings		
3.2.1	The number of dwellings accessed from a single core should not exceed eight per floor, subject to dwelling size mix.	Each core should be accessible to generally no more than eight units on each floor.	Minor amendment (unrelated to Housing Standards Review)
3.2.2	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: <ul style="list-style-type: none"> i more than 25 dwellings are served by one core; or ii the potential occupancy of the dwellings served by one core exceeds 100 bed spaces; or iii more than 8 dwellings are provided per floor. 	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: <ul style="list-style-type: none"> i more than 25 dwellings are served by one core, or ii the potential occupancy of the dwellings served by one core exceeds 100 bed spaces, or iii more than 8 dwellings are provided per floor³. 	Unchanged
3.2.3	Where dwellings are accessed via an internal corridor, the corridor should receive natural light and adequate ventilation where possible.	Where dwellings are accessed via an internal corridor, the corridor should receive natural light and adequate ventilation where possible.	Unchanged
3.2.4	The minimum width for all paths, corridors and decks for communal circulation should be 1200mm. The preferred minimum width is 1500mm, and is considered particularly important where corridors serve dwellings on each side ('double loaded') and where wheelchair accessible dwellings are provided.	Communal circulation should comply with Part M4(2), unless they also serve Wheelchair User Dwellings, where they should comply with the requirements of Part M4(3).	Updated to reflect the new national technical standards.

EXISTING STANDARD		DRAFT STANDARD	REASON FOR CHANGE
3.2.5	For buildings with dwellings entered from communal circulation at the first, second or third floor where lifts are not provided, space should be identified within or adjacent to the circulation cores for the future installation of a wheelchair accessible lift.	Standard removed	Removed following the Housing Standards Review
3.2.6	All dwellings entered at the fourth floor (fifth storey) and above should be served by at least one wheelchair accessible lift, and it is desirable that dwellings entered at the third floor (fourth storey) are served by at least one such lift. All dwellings entered at the seventh floor (eighth storey) and above should be served by at least two lifts.	Every M4(2) dwelling should be provided with step-free access. All dwellings entered at the seventh floor (eighth storey) and above should be served by at least two lifts.	Updated to reflect the new national technical standards.
3.2.7	Every designated wheelchair accessible dwelling above the ground floor should be served by at least one wheelchair accessible lift. It is desirable that every wheelchair accessible dwelling is served by more than one lift.	Every designated wheelchair accessible dwelling above the ground floor should be served by at least one wheelchair accessible lift ⁴ . It is desirable that every wheelchair accessible dwelling is served by more than one lift.	Unchanged
3.2.8	Principal access stairs should provide easy access regardless of whether a lift is provided. Where homes are reached by a lift, it should be fully wheelchair accessible.	Principal access stairs should provide easy access ⁵ regardless of whether a lift is provided. Where homes are reached by a lift, it should be fully wheelchair accessible ⁶ .	Unchanged

EXISTING STANDARD		DRAFT STANDARD	REASON FOR CHANGE
3.3	Car parking		
3.3.1	All developments should conform to LP policy on car parking provision (see Annex 2.3 of this SPG for guidance on implementation of relevant policy including LP Policy 6.13 and associated standards below). In areas of good public transport accessibility and/or town centres the aim should be to provide no more than one space per dwelling. Elsewhere parking provision should be broadly as follows, depending on location as indicated in Annex 2.4: a 4+ bedroom dwellings: 1.5 - 2 spaces per dwelling b 3 bedroom dwellings: 1 - 1.5 spaces per dwelling c 1 - 2 bedroom dwellings: Less than 1 per dwelling	All developments should conform to LP policy on car parking provision (see Annex 3 of this SPG for guidance on implementation of relevant policy including LP Policy 6.13 and associated standards below). In areas of good public transport accessibility and/or town centres the aim should be to provide no more than one space per dwelling. Elsewhere parking provision should be broadly as follows, depending on location as indicated in Annex 3: a 4+ bedroom dwellings: up to 2 spaces per dwelling b 3 bedroom dwellings: up to 1.5 spaces per dwelling c 1 - 2 bedroom dwellings: less than 1 per dwelling	Changed to reflect the 2015 London Plan
3.3.2	Each designated wheelchair accessible dwelling should have a car parking space 2400mm wide with a clear access way to one side of 1200mm.	Each designated wheelchair accessible dwelling should have a car parking space that complies with Part M4 (3).	Updated to reflect the new national technical standards.
3.3.3	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.	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 ⁷ .	Unchanged

EXISTING STANDARD		DRAFT STANDARD	REASON FOR CHANGE
3.3.4	Where car parking is within the dwelling plot, at least one car parking space should be capable of enlargement to a width of 3300mm. Where parking is provided in communal bays, at least one space with a width of 3300mm should be provided per block entrance or access core in addition to spaces designated for wheelchair user dwellings.	Where a dwelling has car parking within its plot, at least one parking space should comply with Part M4(2). Where parking is provided in communal bays, at least one space should be provided per block entrance or access core that complies with Part M4(3) in addition to spaces designated for wheelchair user dwellings.	Updated to reflect the new national technical standards.
3.4	Cycle storage		
3.4.1	All developments should provide dedicated storage space for cycles at the following levels: i 1 per 1 or 2 bedroom dwelling; or ii 2 per 3 or more bedroom dwelling	All developments should provide dedicated storage space for cycles at the following level: i 1 per studio and one bed ii 2 per all other dwellings iii an additional one short stay cycle space should be provided per 40 units.	Changed to reflect the 2015 London Plan
3.4.2	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 acceptable.	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 acceptable ⁸ .	Unchanged

EXISTING STANDARD		DRAFT STANDARD	REASON FOR CHANGE
3.5	Refuse, post and deliveries		
3.5.1	Communal refuse and recycling containers, communal bin enclosures and refuse stores should be 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 and should achieve full credits under the Code for Sustainable Homes Technical Guide. Refuse stores within buildings should be located to limit the nuisance caused by noise and smells and provided with means for cleaning.	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.	Updated to reflect the new national technical standards.
3.5.2	Storage facilities for waste and recycling containers should be provided in accordance with the Code for Sustainable Homes Technical Guide and local authority requirements.	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.	Updated to reflect the new national technical standards.

EXISTING STANDARD	DRAFT STANDARD	REASON FOR CHANGE																																								
4.0	Dwelling Space Standards																																									
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EXISTING STANDARD	DRAFT STANDARD				REASON FOR CHANGE																																																																																						
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<p>*Where a studio has a shower room instead of a bathroom, the floor area may be reduced from 39m² to 37m², as shown bracketed.</p> <p>The Gross Internal Area of a dwelling is defined as the total floor space measured between the internal faces of perimeter walls that enclose a dwelling. This includes partitions, structural elements, cupboards, ducts, flights of stairs and voids above stairs. GIA should be measured and denoted in square metres (m²).</p>																																																																																											
4.1.2	Dwelling plans should demonstrate that dwellings will accommodate the furniture, access and activity space requirements relating to the declared level of occupancy.	Dwelling plans should demonstrate that dwellings will accommodate the furniture, access and activity space requirements relating to the declared level of occupancy.			Unchanged																																																																																						
4.2	Flexibility and adaptability																																																																																										
4.2.1	Dwelling plans should demonstrate that dwelling types provide flexibility by showing that at least one bedroom is capable of being used and furnished as either a double or a twin room according to occupiers' preferences.	Standard removed			Removed following the Housing Standards Review																																																																																						

EXISTING STANDARD		DRAFT STANDARD	REASON FOR CHANGE												
4.3	Circulation in the home														
4.3.1	<p>The minimum width of hallways and other circulation spaces inside the home should be 900mm. This may reduce to 750mm at ‘pinch points’ e.g. next to radiators, where doorway widths meet the following specification:</p> <table border="1"> <thead> <tr> <th>Minimum clear opening width of doorway (mm)</th> <th>Minimum width of hallway where door is in side wall (mm)</th> </tr> </thead> <tbody> <tr> <td>750</td> <td>1200</td> </tr> <tr> <td>775</td> <td>1050</td> </tr> <tr> <td>900</td> <td>900</td> </tr> </tbody> </table> <p>Where a hallway is at least 900mm wide and the approach to the door is head-on, a minimum clear opening door width of 750mm should be provided.</p>	Minimum clear opening width of doorway (mm)	Minimum width of hallway where door is in side wall (mm)	750	1200	775	1050	900	900	The minimum width of hallways and other circulation spaces inside the home should comply with Part M4(2).	Updated to reflect the new national technical standards.				
Minimum clear opening width of doorway (mm)	Minimum width of hallway where door is in side wall (mm)														
750	1200														
775	1050														
900	900														
4.3.2	The design of dwellings of more than one storey should incorporate potential for a stair lift to be installed and a suitable identified space for a through-the-floor lift from the entrance level to a storey containing a main bedroom and an accessible bathroom.	The design of dwellings of more than one storey should incorporate potential for a future stair lift to be installed by providing stairs that complies with M4(2).	Updated to reflect the new national technical standards.												
4.4	Living / dining / kitchen														
4.4.1	<p>The following combined floor areas for living / kitchen / dining space should be met:</p> <table border="1"> <thead> <tr> <th>Designed level of occupancy</th> <th>Minimum combined floor area of living, dining and kitchen spaces (sq.m)</th> </tr> </thead> <tbody> <tr> <td>2 person</td> <td>23</td> </tr> <tr> <td>3 person</td> <td>25</td> </tr> <tr> <td>4 person</td> <td>27</td> </tr> <tr> <td>5 person</td> <td>29</td> </tr> <tr> <td>6 person</td> <td>31</td> </tr> </tbody> </table>	Designed level of occupancy	Minimum combined floor area of living, dining and kitchen spaces (sq.m)	2 person	23	3 person	25	4 person	27	5 person	29	6 person	31	Standard removed	Removed following the Housing Standards Review
Designed level of occupancy	Minimum combined floor area of living, dining and kitchen spaces (sq.m)														
2 person	23														
3 person	25														
4 person	27														
5 person	29														
6 person	31														
4.4.2	The minimum width of the main sitting area should be 2.8m in 2-3 person dwellings and 3.2m in dwellings designed for four or more people.	Standard removed	Removed following the Housing Standards Review												

EXISTING STANDARD		DRAFT STANDARD	REASON FOR CHANGE
4.4.3	Dwellings for five people or more should be capable of having two living spaces, for example a living room and a kitchen-dining room. Both rooms should have external windows. If a kitchen is adjacent to the living room, the internal partition between the rooms should not be load-bearing, to allow for reconfiguration as an open plan arrangement. Studies will not be considered as second living spaces.	Standard removed	Removed following the Housing Standards Review
4.4.4	There should be space for turning a wheelchair in dining areas and living rooms and basic circulation space for wheelchairs elsewhere.	There should be space for turning a wheelchair in dining areas and living rooms and basic circulation space for wheelchairs elsewhere.	Unchanged
4.4.5	A living room, living space or kitchen dining room should be at entrance level.	A living area that complies with M4(2) should be at entrance level.	Updated to reflect the new national technical standards.
4.4.6	Windows in the principal living space should be no higher than 800mm above finished floor level (+/- 50mm) to allow people to see out while seated. At least one opening window should be easy to approach and operate by people with restricted movement and reach.	Glazing to the principal window should comply with Part M4(2). At least one opening window in the principal living area should comply with Part M4(2).	Updated to reflect the new national technical standards.
4.5	Bedrooms		
4.5.1	The minimum area of a single bedroom should be 8 sq m. The minimum area of a double or twin bedroom should be 12 sq m.	The minimum area of a single bedroom should be 7.5sqm. The minimum area of a double or twin bedroom should be 11.5sqm to comply with the nationally described space standard.	Updated to reflect the new national technical standards.
4.5.2	The minimum width of double and twin bedrooms should be 2.75m in most of the length of the room.	One double or twin bedroom should be at least 2.75m wide and every other double or twin should be at least 2.55m wide, in most of the length of the room, to comply with the nationally described space standard.	Updated to reflect the new national technical standards.

EXISTING STANDARD		DRAFT STANDARD	REASON FOR CHANGE
4.5.3	In homes of two or more storeys with no permanent bedroom at entrance level, there should be space on the entrance level that could be used as a convenient temporary bed space.	Standard removed	Removed following the Housing Standards Review
4.5.4	Building structure above a main bedroom and an accessible bathroom should be capable of supporting a ceiling hoist and the design should allow for a reasonable route between this bedroom and bathroom.	Standard removed	Removed following the Housing Standards Review
4.6	Bathrooms and WCs		
4.6.1	Dwellings designed for a potential occupancy of five or more people should provide a minimum of one bathroom with WC and one additional WC.	Standard removed	Removed following the Housing Standards Review
4.6.2	Where there is no accessible bathroom at entrance level, a wheelchair accessible WC with potential for a shower to be installed should be provided at entrance level.	To provide step-free access to a WC that is suitable and convenient to some wheelchair users and, where reasonable, to make provision for showing, dwellings should comply with the requirements of Part M4(2).	Updated to reflect the new national technical standards.
4.6.3	An accessible bathroom should be provided in every dwelling on the same storey as a main bedroom.	An accessible bathroom that complies with Part M4(2) should be provided in every dwelling on the same storey as a double (or twin) bedroom.	Updated to reflect the new national technical standards.
4.6.4	Walls in bathrooms and WCs should be capable of taking adaptations such as handrails.	Walls in the bathrooms and WCs should be capable of taking adaptations and comply with Part M4(2).	Updated to reflect the new national technical standards.

EXISTING STANDARD		DRAFT STANDARD	REASON FOR CHANGE
4.7	Storage and utility		
4.7.1	<p>In dwellings supported by the LDA or receiving public subsidy, built-in general internal storage space free of hot water cylinders and other obstructions, with a minimum internal height of 2m and a minimum area of 1.5 sq m should be provided for 1 and 2 person dwellings, in addition to storage provided by furniture in habitable rooms. For each additional occupant an additional 0.5 sq.m of storage space is required.</p> <p>Private sector dwellings should ensure this minimum area (1.5 sq m) either within the dwelling itself or elsewhere within its curtilage provided minimum internal provision includes storage space free of hot water cylinders and other obstructions with a minimum internal height of 2m and a minimum area of 0.8 sq.m for 1 and 2 person dwellings, in addition to storage provided by furniture in habitable rooms. For each additional occupant an additional 0.5 sq m of storage space is required.</p>	Built-in general internal storage space should be provided to comply with Table 3.3 of the LP, and the nationally described space standard 4.1.	Updated to reflect the new national technical standards.
4.8	Study and work		
4.8.1	Dwelling plans should demonstrate that all homes are provided with adequate space and services to be able to work from home.	Dwelling plans should demonstrate that all homes are provided with adequate space and services to be able to work from home.	Updated to reflect the new national technical standards.
4.8.2	Service controls should be within a height band of 450mm to 1200mm from the floor and at least 300mm away from any internal room corner.	Service controls should be within easy reach and comply with Part M4(2).	Updated to reflect the new national technical standards.

EXISTING STANDARD		DRAFT STANDARD	REASON FOR CHANGE
4.9	Wheelchair accessible dwellings		
4.9.1	Ten percent of new housing should be designed to be wheelchair accessible or easily adaptable for residents who are wheelchair users in accordance with the GLA Best Practice Guide on Wheelchair Accessible Housing.	Ten percent of new housing should be designed to be wheelchair user dwellings that comply with Part M4(3).	Updated to reflect the new national technical standards.
4.10	Private open space		
4.10.1	A minimum of 5 sq m of private outdoor space should be provided for 1-2 person dwellings and an extra 1 sq m should be provided for each additional occupant.	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 ⁹ .	Unchanged
4.10.2	Private outdoor spaces should have level access from the home	All private outdoor space should have accessible threshold from the home ¹⁰ ,	Updated to reflect the new national technical standards.
4.10.3	The minimum depth and width of all balconies and other private external spaces should be 1500mm.	The minimum depth and width for all balconies and other private external spaces should be 1500mm ¹¹ .	Unchanged
5.0	Home as a Place of Retreat		
5.1	Privacy		
5.1.1	Design proposals should demonstrate how habitable rooms within each dwelling are provided with an adequate level of privacy in relation to neighbouring property and the street and other public spaces.	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 spaces ¹² .	Unchanged
5.2	Dual aspect		
5.2.1	Developments should avoid single aspect dwellings that are north facing, exposed to noise levels above which significant adverse impacts on health and quality of life occur, or contain three or more bedrooms.	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 avoided ¹³ .	Minor amendment (unrelated to the Housing Standards Review)

EXISTING STANDARD		DRAFT STANDARD	REASON FOR CHANGE
5.3	Noise		
5.3.1	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.	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.	Unchanged
5.4	Floor to ceiling heights		
5.4.1	The minimum floor to ceiling height in habitable rooms should be 2.5m between finished floor level and finished ceiling level.	To address the unique heat island effect of London and the distinct density and flatted nature of most of London's residential development, a minimum ceiling height for 2.5m for at least 75% of the dwelling area is strongly encouraged so that new housing is of adequate quality, especially in terms of light, ventilation and sense of space.	Updated to reflect the new national technical standards.
5.5	Daylight and sunlight		
5.5.1	Glazing to all habitable rooms should be not less than 20% of the internal floor area of the room.	Glazing to all habitable rooms should be not less than 20% of the internal floor area of the room.	Unchanged
5.5.2	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.	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.	Unchanged
5.6	Air quality		
5.6.1	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).	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).	Unchanged

EXISTING STANDARD		DRAFT STANDARD	REASON FOR CHANGE
6.0	Climate Change Mitigation and Adaptation		
6.1	Environmental performance		
6.1.1	Designers should seek to achieve a minimum of Level 4 of the Code for Sustainable Homes in all new developments.	Standard removed	Updated to reflect the new national technical standards.
6.1.2	All homes should satisfy LP policy on sustainable design and construction and make the fullest contribution to the mitigation of and adaptation to climate change.	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.	Unchanged
6.2	Energy and CO2		
6.2.1	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 2010 Building Regulations 2010 - 2013 25 per cent 2013 - 2016 40 per cent 2016 - 2031 Zero carbon	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 2016 - 2036 Zero carbon	Minor amendment (unrelated to the Housing Standards Review)
6.3	Overheating		
6.3.1	Development proposals should demonstrate how the design of dwellings will avoid overheating during summer months without reliance on energy intensive mechanical cooling systems.	Development proposals should demonstrate how the design of dwellings will avoid overheating without reliance on energy intensive mechanical cooling systems.	Unchanged
6.4	Water		
6.4.1	New dwellings should be designed to ensure that a maximum of 105 litres of water is consumed per person per day.	New dwellings should be designed to ensure that a maximum of 105 ¹⁴ litres of water is consumed per person per day.	Updated to reflect the new national technical standards.

EXISTING STANDARD		DRAFT STANDARD	REASON FOR CHANGE
6.4.2	Where development is permitted in an area at risk of flooding, it should incorporate flood resilient design in accordance with PPS25.	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 Guidance ¹⁵ .	Updated to reflect the new national technical standards.
6.4.3	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.	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.	Unchanged
6.5	Materials		
6.5.1	All new residential development should accord with Code for Sustainable Homes Level 4 and the London Sustainable Design and Construction SPG with regard to the sourcing of materials.	Developments should manage existing materials, specify sustainable materials that are robust and fit for purpose and secure the sustainable procurement of materials.	Updated to reflect the new national technical standards.
6.5.2	All new residential development should meet the requirements of the Code Level 4 with regard to using materials with lower environmental impacts over their lifecycle.	Standard removed	Removed following the Housing Standards Review
6.6	Ecology		
6.6.1	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.	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.	Unchanged

¹ Requirement M4(2) of Schedule 1 to the Building Regulations 2010.HM Government 2015.

² Requirement M4(3) of Schedule 1 to the Building Regulations 2010.HM Government 2015

³ Based on: Secured by Design, ibid

⁴ Compliant with the requirements of Part M4 (3)

⁵ Part K (Protection from falling, collision and impact) requirements for a general access stair.

⁶ Compliant with the requirements of Part M4 (2)

⁷ Building for Life op cit, Criterion 10

⁸ For more detail see: Transport for London Cycle Design Standards www.tfl.gov.uk/businessandpartners/publications/2766.aspx

⁹ Based on: furniture and activity requirements of the HCA HQI ibid on accessibility and adaptability criteria

¹⁰ Balconies and terraces over habitable rooms which require a step up to increase slab thickness / insulation are exempt from the accessible threshold standard.

¹¹ Based on the furniture and activity requirements of the HCA HQI ibid and on accessibility and adaptability criteria op cit

¹² Based on: Secured by Design op cit

¹³ DCLG NPPF 2012 ibid para 123; DEFRA. Noise Policy Statement for England. Explanatory Note. DEFRA, 2010

¹⁴ Excluding an allowance of 5 litres or less per head per day for external water use (as set out in the proposed MALP and 'optional' Requirement G2 of Schedule 1 to the Building Regulations 2010)

¹⁵ 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

**ANNEX 2
BOROUGH LEVEL
INDICATIVE NEED
BENCHMARKS,
AFFORDABILITY RATIOS,
LONDON PLAN TARGETS
AND COMPLETIONS**

DRAFT INTERIM HOUSING SPG

Borough	1. GLA Household Projections 2014 round Long term variant	2. GLA Household Projections 2014 round Short term variant	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. 2015 London Plan minimum target	7. Average annual net completions (2004-2013)
B&D	1,077	1,561	1,530	1,641	6.6	1,236	505
Barnet	1,974	2,547	2,863	2,479	11.27	2,349	994
Bexley	869	982	1,108	1,012	9.07	446	336
Brent	1,498	1,640	1,571	2,196	11.85	1,525	846
Bromley	1,500	1,822	1,779	1,315	10.12	641	676
Camden	850	1,197	1,298	1,042	13.61	889	716
City of London	93	104	87	57	13.44	141	116
Croydon	2,058	2,360	2,357	2,072	8.32	1,435	942
Ealing	1,765	1,870	1,988	1,723	11.61	1,297	912
Enfield	1,671	2,032	2,336	2,160	10.14	798	499
Greenwich	1,594	1,662	1,645	1,559	8.7	2,685	1,285
Hackney #	1,137	1,568	1,805	1,789	11.7	1,725	1,449
Ham & Fulham	687	611	483	246	14.78	1,031	607
Haringey	1,289	1,732	1,945	1,365	11.15	1,502	741
Harrow	1,492	1,498	1,428	1,349	12.71	593	513
Havering	1,032	1,228	1,329	1,181	8.04	1,170	460
Hillingdon	1,175	1,658	1,801	1,644	8.52	559	931
Hounslow	1,418	1,799	1,888	1,660	10.07	822	930
Islington	586	1,261	1,684	1,230	12.13	1,264	1,705
K&C	500	355	285	105	26.81	733	188
Kingston	487	781	1,063	745	12.66	643	320
Lambeth	1,441	1,681	1,820	1,479	10.24	1,559	1,113
Lewisham	1,599	1,876	2,111	1,628	8.41	1,385	884
Merton	975	1,146	1,267	1,084	11.7	411	518
Newham #	1,791	2,417	2,223	2,745	9.24	3,076	1,140
Redbridge	1,803	2,010	2,133	1,981	10.87	1,123	605
Richmond	883	1,018	1,117	714	14.5	315	423
Southwark	1,343	1,747	2,068	1,642	9.72	2,736	1,501
Sutton	1,104	1,396	1,353	992	8.77	363	432
Tower Hamlets #	1,505	2,285	2,728	2,529	7.91	4,195	2,291
Waltham Forest	1,626	1,738	1,679	1,744	10.74	862	531
Wandsworth	1,469	1,465	1,433	860	14.36	1,812	1,174
Westminster	1,319	1,599	1,269	915	18.11	1,068	822

Borough	1. GLA Household Projections 2014 round Long term variant	2. GLA Household Projections 2014 round Short term variant	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. 2015 London Plan minimum target	7. Average annual net completions (2004-2013)
Inner London*					10		
Outer London*					9.79		
London	41,609	50,645	53,474	46,885		42,389	27,106

~ Modelled local housing need by GLA using local version of GLA 2013 SHMA methodology. Note that the borough OAN 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.

/ 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.

Includes relevant area of the LLDC

* Based on DCLG's definition of inner and outer London, which differs from that of the London Plan.

ANNEX 3

CAR PARKING PROVISION

GUIDANCE

A1 Section 1.3 of Part 1 of this SPG addressing implementation of LP Policy 3.4 (optimising housing potential) and Housing Standard 3.3.1 both draw on the Plan’s parking policy 6.13 and in particular the ‘parking for residential development’ Table 6.2 set out below.

London is a diverse city that requires a flexible approach to identifying appropriate levels of car parking provision across boundaries. This means ensuring a level of accessibility by private car is consistent with the overall balance of the transport system at local level”.

LP Table 6.2 “Maximum residential parking standards”

Number of beds	4 or more	3	1-2
	Up to 2 per unit	Up to 1.5 per unit	Less than 1 per unit

A2 There is a widespread perception¹ that the Plan’s parking standards above have to be applied mechanistically, effectively with little or no regard to other relevant policies. Legally, this is not the case, and the Mayor’s intent comes from reading the Plan as a whole. If this is done it can be seen to provide local flexibility, supporting the NPPF² with scope to take account of accessibility; type, mix and use of development; availability of, and opportunities for, public transport; local car ownership; and the overall need to reduce use of high emission vehicles, as well as responding strategically to London’s unique circumstances.

A4 Compared to inner and central London, outer London displays much more variation in the factors underlying NPPF parking policy - accessibility; type, mix and use of development; availability of, and opportunities for, public transport; and local car ownership levels. Greater flexibility is therefore required in implementing pan London parking policy there, and in particular, its associated parking standards.

A3 Policy 6.13C states that the “maximum standards set out in Table 6.2 ... should be applied to planning applications” should be implemented in the context of the much more broadly based and over-arching Policy 6.13A in which “the Mayor wishes to see an appropriate balance being struck between promoting new development and preventing car parking provision that can undermine cycling, walking and public transport use”. This flexibility is amplified in supporting text where the Mayor “recognises that

A5 LP Table 6.2 on car parking standards above relates dwelling size (in terms of bedrooms) to car parking provision. A footnote to the Table indicates that this Housing SPG “will include a table setting out a matrix of residential parking standards that reflect PTAL levels”. It is difficult to embody the Plan’s flexible approach in a single matrix - at least one that will be easy to apply in practice. Accordingly, two complementary illustrations to guide implementation of the parking standards in relation to public transport accessibility are set out below. Matrix 1 has the virtue of simplicity and only adds PTAL level to the bedroom based standards in LP Table 6.2. Matrix 2 is more sophisticated and provides scope to relate transport and development more closely by effectively

¹ Outer London Commission 2012 ibid

² DCLG NPPF 2012 ibid paras 39 - 40

adding the parking standards to LP Table 3.2, the density matrix. These matrices are only indicative and use graduated shading to underscore the flexibility in the Plan's parking policies. It is intended that they should be used to establish the parameters for a broader appraisal of local circumstances. Mechanistically 'one size fits all' planning tools are not appropriate in this context.

- A6 The Outer London Commission found that "while over two fifths of Outer London's population live in areas with low public transport accessibility (PTALs 0 - 1), these areas account for only one fifth of Outer London's housing output or 9% of the London total. In much of the area a reasonable increase in parking provision above strategic standards for new development might have only a limited effect on local congestion in peak periods... Boroughs are best placed to interpret how the standards should be implemented in low PTAL areas and ... the ability to implement policy flexibly is already in their hands³". In doing this in these areas, boroughs are advised to take account of accessibility to local services and amenities, the availability of local on- and off-street parking; and existing and future highway congestion. They should carefully monitor the impact of a more flexible approach to parking provision on residential development capacity. Outer boroughs are advised to take a firmer approach to implementation of the residential parking standards in major developments, town centres and Opportunity Areas in these areas as they are likely to generate more concentrated traffic flows and congestion.
- A7 In some cases mechanistic application of parking policy may be partly a product of development management processes⁴ – advice on the policy is sometimes developed separately from that on other planning issues and not integrated within it in a balanced way. Thus, for example, the approach to parking provision for smaller dwellings is sometimes literalist in the sense that 'less than 1 space per unit' is interpreted as being as far below 1 as possible rather than embracing the flexibility of the Plan to enable provision to be 'up to 1' . Policy should be applied appropriately in the local circumstances of each case, having regard to the degree of flexibility inherent in strategic policy. More generally, relevant authorities should seek to ensure that a balanced approach, taking proper account of all material considerations, is taken when implementing parking policy.
- A8 Car parking is an important land use and design consideration. Particular account should be taken of the impacts that the siting and organisation of car parking could have on the use and appearance of open spaces and access to the home, and their effects on housing delivery.
- A9 To secure closer integration between development and public transport accessibility and to manage parking demand, in appropriate locations with good public transport accessibility boroughs should consider the scope to use planning conditions and planning obligations on whole developments, and covenants on individual dwellings. This can include using mechanisms such as reduced car parking standards and, in controlled parking zones, ineligibility

³ Outer London Commission 2012 *ibid* paras 4.15 - 16

⁴ Outer London Commission 2012 *ibid*

for on-street residents parking permits. Account should also be taken of the planned social composition of a development and its bearing on parking demand, more general changing attitudes towards car ownership and use, and the need to coordinate on- and off-street parking provision to address local amenity, congestion and safety concerns. Car-capped and car-free housing, through controls over residents' parking and permits and encouragement of 'car clubs'⁵ can allow higher densities to be realised in appropriate locations without compromising residential quality. Car clubs are increasingly proving viable and attractive in areas well served by public transport and with effective on-street parking controls⁶. Car-free developments should allow space for drop-off, emergency access and deliveries, and meet the needs of disabled residents and visitors..

- A10 Policy 6.13 requires appropriate provision for parking for disabled people, recognising the LP target that 10% of residential provision should be accessible by wheelchair users⁷. Each designated wheelchair user dwelling should be allocated a designated parking space in line with Standard 3.3.2 and the Accessible London SPG. Where relevant account should be taken of the need for convenient wheelchair access between parking and residential levels of

buildings. Disabled persons parking bays and mobility scooter storage/charging points should be located as close as possible to lift cores.

- A11 The Plan also encourages more widespread use of innovative energy technologies including hydrogen as an alternative to fossil fuels, by fostering uptake of hydrogen and fuel cell vehicles and provision of infrastructure to support them (Policy 5.8). Policy 6.13 promotes the uptake of electrical vehicles and requires 20 per cent of all parking spaces to provide electric charging points for electric vehicles with an additional 20% 'passive' provision for electric vehicles in the future. 'Passive' provision means putting in place the cabling and supporting infrastructure to facilitate future installation of charging points
- A12 The LP seeks to improve conditions for cycling, including encouraging adequate, secure cycle parking facilities within new developments, taking account of the cycle parking standards set out in LP Table 6.2 and summarised in Housing Standard 3.4.1 (these are subject to revision⁸).
- A13 To reduce problems associated with overspill parking on-street, the Mayor has published a draft Minor Alteration to the London Plan requiring boroughs in outer London to take into account the need to increase parking provision for residential development in areas with low public transport accessibility (generally

⁵ Urbed for Greater London Authority (GLA), the London Development Agency (LDA), the Association of London Government (ALG) and Transport for London (TfL). Tomorrow's Suburbs: London Plan toolkit. GLA, June 2006

⁶ London Borough of Camden. <http://www.camden.gov.uk/ccm/content/transport-and-streets/transport-strategies/car-free-housing.en>, LB Camden. Last updated October 2011

⁷ Mayor of London. London Plan. Policy 3.8

⁸ Mayor of London. Early Alterations to the London Plan. Spatial Development Strategy for Greater London. Affordable housing, cycle parking and minor clarifications. Proposals for consultation with the London Assembly and GLA Functional Bodies. GLA, 2011

0-1). The proposed Alteration identifies criteria to inform these boroughs in framing local policy to address such circumstances.

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Chinese

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Vietnamese

Nếu bạn muốn có bản tài liệu này bằng ngôn ngữ của mình, hãy liên hệ theo số điện thoại hoặc địa chỉ dưới đây.

Greek

Αν θέλετε να αποκτήσετε αντίγραφο του παρόντος εγγράφου στη δική σας γλώσσα, παρακαλείστε να επικοινωνήσετε τηλεφωνικά στον αριθμό αυτό ή ταχυδρομικά στην παρακάτω διεύθυνση.

Turkish

Bu belgenin kendi dilinizde hazırlanmış bir nüshasını edinmek için, lütfen aşağıdaki telefon numarasını arayınız veya adrese başvurunuz.

Punjabi

ਜੇ ਤੁਹਾਨੂੰ ਇਸ ਦਸਤਾਵੇਜ਼ ਦੀ ਕਾਪੀ ਤੁਹਾਡੀ ਆਪਣੀ ਭਾਸ਼ਾ ਵਿਚ ਚਾਹੀਦੀ ਹੈ, ਤਾਂ ਹੇਠ ਲਿਖੇ ਨੰਬਰ 'ਤੇ ਫੋਨ ਕਰੋ ਜਾਂ ਹੇਠ ਲਿਖੇ ਪਤੇ 'ਤੇ ਰਾਬਤਾ ਕਰੋ:

Hindi

यदि आप इस दस्तावेज की प्रति अपनी भाषा में चाहते हैं, तो कृपया निम्नलिखित नंबर पर फोन करें अथवा नीचे दिये गये पते पर संपर्क करें

Bengali

আপনি যদি আপনার ভাষায় এই মলিগেল প্রতিলিপি (কপি) চান, তা হলে নীচের ফোন নম্বরে বা ঠিকানায় অনুগ্রহ করে যোগাযোগ করুন।

Urdu

اگر آپ اس دستاویز کی نقل اپنی زبان میں چاہتے ہیں، تو براہ کرم نیچے دئے گئے نمبر پر فون کریں یا دیئے گئے پتے پر رابطہ کریں

Arabic

إذا أردت نسخة من هذه الوثيقة بلغتك، يرجى الاتصال برقم الهاتف أو مراسلة العنوان أدناه

Gujarati

જો તમને આ દસ્તાવેજની નકલ તમારી ભાષામાં જોઈતી હોય તો, કૃપા કરી આપેલ નંબર ઉપર ફોન કરો અથવા નીચેના સરનામે સંપર્ક સાધો.

