HOUSING
SUPPLEMENTARY PLANNING GUIDANCE
NOVEMBER 2012

LONDON PLAN 2011
IMPLEMENTATION FRAMEWORK

MAYOR OF LONDON

HOUSING
SUPPLEMENTARY PLANNING GUIDANCE
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FOREWORD

Providing Londoners with a genuine choice of decent homes at a price they can afford is arguably the greatest challenge for any Mayor of London. The planning system has a key part to play in meeting this. "The people – where will they go?" is one of the fundamental questions plans and planners have been trying to answer since the days of Ebenezer Howard.

The 2011 London Plan provides a comprehensive framework for tackling this challenge over the next twenty years. It sets minimum provision targets for new housing that are stretching, but realistic. It highlights the need for different forms of affordable housing, and the need to look at the changing needs and demands for housing driven by a growing and changing population. This means recognising that housing isn't just a numbers game, so the Plan introduces standards to ensure that new homes are well-designed and set in an attractive environment.

The Plan's policies show what needs to be done. This Supplementary Planning Guidance explains how to do it.

It identifies the different sources of housing capacity that have to be explored if the Plan's targets are to be achieved and shows how to bring them forward. It explains the careful balance which has to be struck between numbers, creating an attractive place to live and respecting the character of surrounding areas.

It provides more detail about the housing design standards outlined in the London Plan. These have been tested to make sure they will help deliver new housing, are realistic and will make a real difference to the quality of life of new residents, recognising the need for flexibility in applying parking standards, especially in areas with poor public transport accessibility.

Widening housing choice is a particular priority. We have brought together and updated guidance about the requirements of groups with distinct housing needs such as older people, larger families, students and gypsies and travellers, as well as meeting the special needs of children.

I have consulted extensively on this SPG and would like to thank all who have responded so positively, especially the Outer London Commission which has had a key part in the process. Research has been commissioned to help ensure that the Plan's policies are implemented effectively, and guidance has been cast in light of the recent National Planning Policy Framework as well as the London Plan so that it is robust procedurally.

There is an urgent need for more affordable housing in London, especially for families. This document supports this priority, in particular showing how the new Affordable Rent product can help maximise affordable housing output.

Boris Johnson
Mayor of London

Scheme: Brandon Street, Elephant and Castle, Credit: Jonathan Finch

INTRODUCTION

0.1 PURPOSE OF THIS SPG

0.1.1 This document sets out guidance to supplement the housing policies in the 2011 London Plan (LP)[1]. In particular, it provides detail on how to carry forward the Mayor's view that "providing good homes for Londoners is not just about numbers. The quality and design of homes, and the facilities provided for those living in them, are vital to ensuring good liveable neighbourhoods"[2]. It is informed by, and is consistent with the Government's National Planning Policy Framework[3] and its new Housing Strategy for England[4].

0.1.2 Supplementary Planning Guidance (SPG) on housing was first published in 2005 to guide implementation of the first (2004) London Plan. In light of experience in using the 2005 SPG and subsequent Alterations to the 2004 Plan (which were brought together in a consolidated edition in 2008[5]), interim Guidance[6] to clarify implementation of policy concerned with garden land development, housing density and affordable housing was published by the Mayor in 2010. Further guidance (in the form of early drafts of sections of this document) to illustrate how some of the housing policies of a new draft Replacement London Plan might be implemented was published in 2010 to inform its Examination in Public[7].

0.1.3 This SPG recognises that government's new Affordable Rent product is crucial in meeting Londoners' needs for affordable homes, including those hitherto addressed by social rent. The SPG provides guidance on using the 2011 Plan to tackle the issue. The Plan itself is subject to a Revised Early Minor Alteration (REMA)[8] which will incorporate government's new definition of affordable housing and affirm more emphatically how important it is for the planning process across the capital London to take a positive approach in enabling Affordable Rent to meet the spectrum of Londoners' needs, including those which are most acute. Should further clarification be necessary, the Mayor will revise this SPG to provide additional guidance, subject to further consultation.

0.1.4 This guidance also takes account of new Mayoral powers[9], especially those concerned with planning, housing and climate change, and complements other Mayoral strategies[10].

0.1.5 As SPG, this document does not set new policy. It contains guidance supplementary to London Plan policies. While it does not have the same formal development plan status as these policies, it has been formally adopted by the Mayor as supplementary guidance under his powers under the Greater London Authority Act 1999 (as amended). Adoption followed a period of public consultation, and a summary of the comments received and the responses of the Mayor to those comments is available on the Greater London Authority website. It will therefore be a material consideration in drawing up development plan documents and in taking planning decisions.

1 Mayor of London. The London Plan (LP). Spatial Development Strategy for Greater London. GLA, 2011
2 Mayor of London. Planning for a Better London. GLA, 2008
3 CLG. National Planning Policy Framework (NPPF). CLG, 2012
4 HM Government. Laying the Foundations. A Housing Strategy for England (Housing Strategy). CLG, 2011
5 Mayor of London. The London Plan. Spatial Development Strategy for Greater London. Consolidated with Alterations since 2004. GLA, 2008
6 Mayor of London. The London Plan: Interim Housing Supplementary Planning Guidance. GLA, 2010
7 Mayor of London. 2009 Draft Replacement London Plan. Housing SPG EIP Draft. GLA, 2010
8 Mayor of London. The London Plan. Spatial Development Strategy for Greater London. Revised Early Minor Alterations. Consistency with the National Planning Policy Framework. Consultation Draft (REMA). GLA, 2012.
9 Parliament. Greater London Authority Act. Crown Copyright, 2007
10 See www.london.gov.uk/publication/mayoral-strategies

Key London Plan policies

0.1.6 This SPG seeks to provide a convenient and accessible guide to implementing the key LP policies which bear on planning for housing. While it does not of course cover every relevant policy, it does look beyond those explicitly tagged as 'housing'. The latter are set out in Chapter 3 of the LP (Policies 3.3 - 3.15).

0.1.7 Also of importance, especially in terms of addressing the Mayor's quality of life concerns, are those dealing with social infrastructure provision (3.2 and 3.16 – 3.19), climate change (5.1 – 5.13), place shaping (7.1 – 7.7), heritage and landscape (7.8 – 7.12), and the open and natural environment (7.16 – 7.30). Account should also be taken of those which bear on release of land from other uses and mixed use development (industry: 2.17 and 4.4; offices: 4.2 and 4.3); water and waste (5.14 - 5.17); construction (5.18, 5.20 - 5.22); the strategic approach to transport (6.1) and more specifically transport capacity assessments (6.3), better streets including parking, cycling and walking (6.7 – 6.13); and resources including planning obligations and the Community Infrastructure Levy (8.1 – 8.3).

0.1.7 These must all be considered in the context of the Mayor's spatial priorities for London set out in Chapter 2 of the LP, taking particular account of the importance of housing development associated with town centres (2.15) and Opportunity and Intensification Areas (2.13); the challenges facing Regeneration Areas (2.14), the particular potential of east London (paragraph 1.43) and development corridors (2.3); and the distinct circumstances of outer (2.6 –2.8) and inner (2.9) London, the Olympic Legacy area (2.4) and the Central Activities Zone (2.10 – 2.11).

London's need for new housing

0.1.8 The Plan's population projections confirm long set trends and show London likely to continue its established population growth – a position underscored strongly by estimates emerging from the 2011 Census. In line with the NPPF, the LP identifies housing capacity and seeks to accommodate this growth in a sustainable way – taking account of its social and economic implications as well as its potential environmental impact, not least by accommodating it without encroaching on protected green spaces, and within London's own boundaries. Drawing on a joint borough and GLA Strategic Housing Land Availability Assessment/Housing Capacity Study[11], the LP sets out a housing provision target consistent with an annual average of 32,200 additional homes across London for the decade to 2021. Resonating with the intent of the NPPF, this is set in policy as a minimum, and the Mayor will seek to close the gap between this and the projected need for 34,900 more homes per annum.

0.1.9 To meet these needs, all boroughs will have to identify new housing opportunities and sources of supply. Substantial new housing will have to be built on brownfield sites across London, in the areas the LP identifies for growth and mixed-use development[12], and on sites within and around suburban town centres.

11 Mayor of London. The London Strategic Housing Land Availability Assessment and Housing Capacity Study (SHLAA) 2009. GLA, 2009

12 The London Plan identifies 33 Opportunity Areas and 10 Areas for Intensification. Areas of Intensification have significant potential for increases in residential, employment and other uses through development of sites at higher densities with more mixed and intensive use. Opportunity Areas are locations where large-scale development can provide substantial numbers of new employment and housing (typically >5000 jobs and/or 2500 homes), with mixed and intensive use of land. Further information can be found in Chapter 2 of the London Plan.

0.1.10 Much new housing will be built in areas with good public transport accessibility, especially in east and inner London. Significant new housing will also come at lower densities from sites less well served by public transport and from careful development of small sites. The LP's new approach to optimising rather than maximising housing output on individual sites means that development of these, and other sites, must have more emphatic regard to the sensitivities entailed in developing within established neighbourhoods and in particular take proper account of local context. The LP also provides specific support for protection of gardens where this is locally justified.

The London Plan, this Housing SPG and the National Planning Policy Framework

0.1.11 Though the London Plan and the consultation draft of this SPG were published before the NPPF was finalised, they resonate closely with the intent of the Framework, most notably in its definition of sustainable development and in its positive approach to securing this when seeking to meet housing requirements. The Mayor's Revised Early Minor Alterations identify only one policy (the definition of affordable housing) which is actually inconsistent with the NPPF (and even on this the Plan identifies Affordable Rent as a matter of fact if not as policy) and a further 33 which are 'consistent in substance' but where clarification will be provided to make clear that the Plan is conformable with national policy[13]. Paragraph 10 of the NPPF makes clear that it has the inherent flexibility to accommodate the Plan's (and this SPG's) translation of national policy to the distinct circumstances of London. It does not seek to be a 'one size fits all' Framework and makes clear that "plans and decisions need to take local circumstances into account, so that they respond to the different opportunities for achieving sustainable development in different areas".

0.1.12 Thus, this SPG (devolving from the 2011 Plan) helps to add the London dimension to government's core principles that planning should[14]:

- "be genuinely plan-led, empowering local people to shape their
- surroundings ….. (with plans) …. setting out a positive vision for the future …. kept up–to–date …, based on joint working and co–operation to address larger than local issues …. provid(ing) a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency";
- "not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives"; "proactively drive and support sustainable economic development to deliver the homes ….. infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area,

13 Mayor of London REMA 2012 ibid para 1.3

14 CLG NPPF 2012 ibid para 17

taking account of the needs of the residential and business communities";
- "always seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings";
- "take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them…."
- "support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change, and encourage the reuse of existing resources, including conversion of existing buildings, and encourage the use of renewable resources (for example, by the development of renewable energy)";
- "contribute to conserving and enhancing the natural environment and reducing pollution. Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework" (and the London Plan);
- "encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value";
- "promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production);
- "conserve heritage assets in a manner appropriate to their significance, so that they can be enjoyed for their contribution to the quality of life of this and future generations";
- "actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainabl"; and
- "take account of and support local strategies to improve health, social and cultural wellbeing for all, and deliver sufficient community and cultural facilities and services to meet local needs".

0.1.13 Given the weight the NPPF attaches to a sound evidence base, this SPG explains how and why in the unique circumstances of London, the LP has refined the national approach to Strategic Land Availability Assessments (SHLAA) so output from the London SHLAA can, with relatively minor updating, be used as a robust, proportionate and cost effective basis for borough housing targets (see Part 1.1 below). The SPG also complements the Mayor's approach to his new housing powers set out in the London Housing Strategy[15], and it will inform his role as the chairman of the London Housing Board.

0.1.14 As anticipated in the LP[16], this integrated approach to housing and planning is an important element of modern spatial planning. It also allows the Mayor to take a short to medium term view of housing development, including the implications of the current economic down turn, in his LHS[17] and to complement it with the longer term perspective provided by the LP.

15 Mayor of London. The revised London Housing Strategy for consultation with the public – GLA, 2011
16 Mayor of London LP 2011 ibid, Paragraph 0.12, Policies 3.14, 3.15.
17 Mayor of London. LHS 2011 ibid

Scheme: Wansey Street, Credit: Jonathan Finch

Regional context

0.1.15 Within London, the Mayor seeks delivery of housing in line with national principles of sustainable development. To complement this, beyond London, it is imperative that the most effective use is made of the available capacity, which if realised will help meet housing shortages in the wider region and allow increased housing choice[18]. While the Mayor is not bound by the statutory Duty to Cooperate when preparing this guidance, he has sought to reflect the NPPF's emphasis on taking forward 'the duty to cooperate' (and his own statutory duty under the GLA Act 1999 (as amended) to consult with neighbouring authorities). The 2011 Plan puts strong emphasis on a coordinated approach to housing provision and need beyond London's borders and the Mayor is working with partners to establish new and effective mechanisms to support this coordination.

The planning system

0.1.16 The planning system established by the Planning and Compulsory Purchase Act 2004 requires each London borough to replace its Unitary Development Plan with a Local Development Framework (LDF). All boroughs have now embarked on this course. The LDF must include a Core Strategy setting out the requirement for new housing in the borough. The LDF has to be in general conformity with the 2011 Plan, which is also a statutory Development Plan in London[19]. Regulations under the Act also require local planning authorities to report annual net additions to housing stock.

The structure of this document

0.1.17 The SPG is divided into seven parts. Part 1 deals with housing provision, Part 2 with housing quality, Part 3 with housing choice, Part 4 with affordable housing, Part 5 with investment and existing housing stock, Part 6 with social infrastructure, and the last with mixed use development.

18 See also: Growth in the Thames Gateway. Interregional Planning Statement by the Thames Gateway Regional Planning Bodies. ODPM, August 2004.
19 Communities and Local Government. Planning and Compulsory Purchase Act 2004. CLG, 2004, section 38

One Tower Bridge, Southwark © Molior / photo by AjDenny

PART 1

HOUSING SUPPLY

1.0.1 This part of the SPG provides guidance on the strategic approach to increasing housing supply set out in London Plan (LP) Policies 3.3 and 3.4. In keeping with the Plan's focus on quality, it makes clear that increasing output is not a simple end in itself – new housing must also enhance the environment, improve choice and affordability and provide better quality homes. The new Plan[1] aims to maximise output but to do so by ensuring the potential of sites is *optimised* – this means ensuring the best balance of numbers, quality, mix of tenure and different types of home, while respecting local context. This in turn supports delivery of the national presumption in favour of sustainable development, and more specifically, housing provision [2].

1.0.2 The first part of this section focuses on the use of the targets in Table 3.1 of the LP and relates this to new national planning policy. This leads into advice on realising the housing potential of different sources of development capacity. The second part of the section provides guidance on optimising housing potential across the spectrum of site types, taking into account local context, principles of good design, public transport accessibility and appropriate use of the residential quality (SRQ) density matrix (LP Table 3.2).

1 Mayor of London. The London Plan (LP). Spatial Development Strategy for Greater London. GLA, 2011

2 CLG. National Planning Policy Framework (NPPF). CLG 2012 paras 6 – 15, 47 – 53, 158 – 162 and other national polices concerned with social, environmental economic and transport matters which bear on housing provision. These are referenced where relevant.
Rt Hon Eric Pickles. Ministerial Statement. Housing and Planning. 6th September 2012

POLICY 3.3 – INCREASING HOUSING SUPPLY

Strategic

A Working with relevant partners, the Mayor will seek provision consistent with at least an annual average of 32,210 additional homes across London which will enhance the environment, improve housing choice and affordability and provide better quality accommodation for Londoners.

B This target will be reviewed by 2015/16 and periodically thereafter and provide the basis for monitoring until then.

LDF preparation

C Boroughs should seek to achieve and exceed the relevant minimum borough housing annual target in Table 3.1 and, if a target beyond 2021 is required, roll forward and seek to exceed that in Table 3.1 until it is replaced by a revised London Plan target.

D Boroughs should identify and seek to enable development capacity to be brought forward to meet 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 Policy 2.13, 3.4)

b town centre renewal (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 (see Policies 2.7, 2.11, 4.2-4.4)

e sensitive renewal of existing residential areas (see Policies 3.4, 3.5, 3.14

E Boroughs must identify new, and review existing housing sites for inclusion on LDFs.

F Boroughs should monitor housing capacity and provision against the average targets in Table 3.1 and the sensitivity ranges set out in the SHLAA report of study 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 across London, the Mayor took account of then current national planning policy, the issues entailed in applying this in the unique circumstances of London, his own housing priorities and the need to make sure boroughs could deliver against these in the light of local circumstances. He was mindful that although strategically derived provision targets have an important part to play in planning to meet London's housing needs, there was a danger that the complexity of the previous national process for setting them meant it could become an end in itself and that it could undermine both his own and boroughs' housing objectives. Given all this, the Mayor has brought forward targets which are soundly based on the principles of sustainable development, realistic and derived from a transparent methodology and partnership working, so that they provide a robust basis for the development of local policies; for strategic purposes (see paragraph 1.1.9), and for taking forward the intent of the National Planning Policy Framework[3].

1.1.2 At the time of writing, Regional Spatial Strategies are in the process of abolition and national guidance requiring the setting of targets in the LP has been revoked. The Mayor nevertheless considers that in a city as large and complex as London, with a single housing market and a unique two tier planning system to coordinate development to meet its needs, consistent, equitable and 'commonly owned' strategic housing targets should be one of the range of policy mechanisms necessary to

3 CLG NPPF 2012 ibid paras 47 - 53, 158 - 162

address housing need. They should not, as they had a danger of becoming, be an end in themselves. He has, however, made clear that he does not consider that the methodology which has been used to develop the targets in the LP is the most effective way forward for the future. Although it provided rigour, it also reflected historic, national guidance which constrained boroughs and the GLA from taking proper account of London's unique circumstances. The Mayor is working with boroughs and other stakeholders to develop a more effective methodology which will respect London's distinct needs and circumstances. This will be used to produce new targets, which will be better placed to enable London to tackle its housing needs through a future alteration to the LP in light of the National Planning Policy Framework.

1.1.3 The targets in Table 3.1 of the LP cover a ten year period rather than the fifteen suggested by national guidance[4]. The Mayor considered the national requirement is unrealistic in the particular circumstances of London. London is the most vibrant land market in the country. Over 96% of housing output here comes from brownfield land, and some sites which may be occupied by housing within five years, much less fifteen, are currently in other active uses. In his view, it is reasonable and appropriate to estimate the future potential of these currently occupied (or 'potential') sites on the basis of the probability of them coming forward for housing, to keep these site level probability estimates confidential and to represent them in aggregate at borough level. This is a more authoritative way of identifying housing potential than the conventional approach to assessing 'windfalls' – a point accepted by independent panels through two LP examinations in public. With some proportionate local updating to ensure technical compliance with the NPPF (see paragraph 1.1.11 of this SPG), boroughs are advised to take a similarly robust approach in justifying the 'roll forward' of their LDF housing targets until those in Table 3.1 are revised on a consistent strategic basis no later than 2015/16.

1.1.4 The Table 3.1 targets have been found sound in terms of compliance with national guidance. They are based on the London Strategic Housing Land Availability Assessment and Housing Capacity Study 2009[5] (SHLAA) carried out in line with still current national requirements[6]. They were informed by household growth projections[7], the London Strategic Housing Market Assessment 2008 (SHMA)[8], and tested against the former National Housing and Planning Advice Unit (NHPAU) benchmarks[9]. The SHLAA results have also been reviewed by two independent viability assessments. The purpose of one assessment was to test the specific impact of the proposed housing

4 CLG. Planning Policy Statement 3 (PPS3) Housing. Para 34. CLG, June 2010
CLG. NPPF 2012 ibid paras 47 – 49

5 Mayor of London. Strategic Housing Land Availability Assessment and Housing Capacity Study 2009 (SHLAA). GLA, 2009

6 Mayor of London SHLAA 2009 ibid, Para 3.1 – 3.2, Annex 5 and Mayor of London. Strategic Housing Market Assessment 2008 (SHMA). GLA, 2009
A more detailed explanation of how the SHLAA and SHMA addressed the requirement is set out in Annex 5 of the SHLAA 2009 report (ibid) showing how it addressed the different 'Stages' and the SHLAA proposals and the SHMA report (ibid)

7 Mayor of London. Strategies' Joint Evidence Base. GLA, 2009

8 Mayor of London 2008 SHMA ibid, Chapter 1;

9 National Housing and Planning Advice Unit. More homes for more people: advice to Ministers on housing levels to be considered in regional plans. NHPAU, 2009

standards on output and cost[10]. The other provided a 'double check'[11] on viability in terms of the specific requirements of section 7c of national SHLAA guidance[12] (applied to overall housing provision rather than the affordable housing viability assessments then required by PPS3[13]). This concern to test the viability of capacity identified in the targets resonates with the requirements of the NPPF[14]. Boroughs and other stakeholders are advised to take account of the robust strategic foundations of the LP housing targets in this regard when setting their own local targets and to augment them where appropriate with more detailed assessments of local viability. In undertaking these assessments Boroughs may wish to draw on the advice of the Local Housing Delivery Group on viability testing in local plans[15]. This includes guidance that a plan wide test should be proportionate and can be based on a sample rather than the universe of sites to see if they are 'broadly viable'. The Group notes that it is advisable to include a 'viability cushion ' to manage the risks associated with such an approach.

10 GVA Grimley. Draft London Housing Design Guide: Cost and Delivery Impact Assessment. LDA, GLA and HCA, 2010
This resonates with the assessment undertaken by the Local Housing Delivery Group "A review of Standards for the Delivery of new Homes", LHDG 2012

11 Atkins/BNP Paribas. Strategic Housing Land Availability Assessment and Housing Capacity Study Viability Assessment. GLA, 2010

12 Communities and Local Government. SHLAA Practical Guidance. CLG, 2007, Para 40

13 Communities and Local Government PPS3 2010 ibid, Para 29, and High Court Decision. Persimmon Homes (North East) Limited, Barratt Homes Limited, Millhouse Developments Limited v Blyth Valley Borough Council, 2008

14 CLG NPPF paras 159, 173 – 177 2012 ibid

15 Local Housing Delivery Group chaired by Sir John Harman. Viability Testing Local Plans. Advice for planning practitioners. LHDG, 2012

Table 3.1: Annual Average Housing Provision Monitoring Targets 2011-2021

Borough	Minimum ten year target	Annual monitoring target
Barking and Dagenham	10,650	1,065
Barnet	22,550	2,255
Bexley	3,350	335
Brent	10,650	1,065
Bromley	5,000	500
Camden	6,650	665
City of London	1,100	110
Croydon	13,300	1,330
Ealing	8,900	890
Enfield	5,600	560
Greenwich	25,950	2,595
Hackney	11,600	1,160
Hammersmith and Fulham	6,150	615
Haringey	8,200	820
Harrow	3,500	350
Havering	9,700	970
Hillingdon	4,250	425
Hounslow	4,700	470
Islington	11,700	1,170
Kensington and Chelsea	5,850	585
Kingston	3,750	375
Lambeth	11,950	1,195
Lewisham	11,050	1,105
Merton	3,200	320
Newham	25,000	2,500
Redbridge	7,600	760
Richmond	2,450	245
Southwark	20,050	2,005
Sutton	2,100	210
Tower Hamlets	28,850	2,885
Waltham Forest	7,600	760
Wandsworth	11,450	1,145
Westminster	7,700	770
London Total	**322,100**	32,210

Monitoring benchmarks

1.1.5 The SHLAA was prepared at the end of what can now be seen to have been one of the strongest post war housing booms, and the targets in Table 3.1 were derived at the onset of an equally significant economic down turn. As far as possible, the targets sought to take account of this volatility. Nevertheless, some uncertainty inevitably remained. The LP addresses it (Policy 3.3) by recognising that long term, and apparently high targets should not be used to 'penalise' boroughs at a particular low point in the market/investment cycle when housing output is reduced. With this in mind it is important to read all the relevant sections of the policy (paragraphs A, B and F) together, and take particular account of the term 'provision consistent with at least an annual average of 32,210 net additional homes'. Use of 'average' maintains the long term strategic (and borough) 'direction of travel' for policy to secure housing output at or above a minimum level over the decade, while providing the flexibility to take account of the impact of short term market/investment trends over which policymakers have no control. It may be appropriate to refer to this flexibility in commentary within annual monitoring reports or when preparing housing trajectories/'five year supply[16]' inventories.

1.1.6 This flexibility might also be noted when addressing challenges to the targets on the grounds that a boroughs has 'under-delivered' (in terms of the second bullet of NPPF para 47) but it is clear that this 'under-delivery' is due to macro-economic factors, rather than 'persistent' under-performance in planning terms. It is for boroughs to assess whether they have fallen within this latter category and whether they should increase the 5% 'buffer', which government requires, to 20% by moving forward supply identified in later phases of the SHLAA (or supply which has been identified subsequent to the SHLAA).

1.1.7 The flexibility in the Plan's targets should not be used by a borough to justify a long term short fall in provision. Local Development Frameworks should demonstrate that they seek to ensure that housing provision targets are met and, if possible, exceeded over the full 10 year period, in line with the broad intent of Policy 3.3, and to seek to address the NPPF dictum to meet need.

1.1.8 Annex 4 of the LP disaggregates the housing provision targets for each borough by sources of supply (conventional supply, non self-contained accommodation and long term vacant properties returning to use). From a strategic perspective, these individual components are not put forward as targets but as monitoring benchmarks (although where appropriate boroughs may chose to use them as such). They are an essential part of the 'plan, monitor and manage' approach underpinning the LP's recognition of the unique dynamics of the capital's housing market.

Use of the targets in LDFs

1.1.9 The Table 3.1 targets were designed to provide an authoritative (see paras 1.1.1 – 8 above) and convenient basis for future development of local targets with little modification/updating. One prepared on this basis has already been found sound for use in London's first NPPF conformable

16 HM Government. Laying the Foundations: A Housing Strategy for England (Housing Strategy) para 2.77. CLG, 2011

Core Strategy[17]. The Mayor is also mindful that SHLAAs are expensive to prepare, and carrying out a strategically coordinated SHLAA represents a prudent use of public resources if the results can be substantially robust for use at local level in LDFs. A consistent, strategically coordinated SHLAA also provides an equitable, but locally sensitive, framework to identify the housing provision necessary to meet need across the London housing market area (and its submarkets, which have little regard to administrative boundaries).

1.1.10 Nevertheless some London stakeholders have expressed concern that national guidance (NPPF paras 47 - 48) can be read as possibly compromising effective, local use of Table 3.1 borough targets in LDFs. The Mayor is confident, however, that with some relatively minor refinements, the LP targets can still be used authoritatively in this way. In practical terms this means that LDFs should demonstrate that they have taken account of guidance in the Framework, particularly its broad intent to address need with an authoritative estimate of supply, and of the unique circumstances of the capital expressed through the LP, noting:

- The justification in paragraph 1.1.3 above as to why a **10 rather than 15 year** target is appropriate in the distinct circumstances of London. However, in recognition of the NPPF paragraph 47 national requirement for a 15 year horizon, boroughs should where necessary roll forward the annualised average for the period 2011 – 2021 until this is replaced by a new LP target. In considering this, regard should be had to the Mayor's intention to develop a **new, more responsive methodology for a study** which will provide the basis for a replacement target as soon as possible, and to have the new target itself in place no later than 2015/16. It should also be noted that the principle of rolling targets forward was accepted by two LP EIPs and, for historical context, confirmed by a joint statement between the Government Office for London and the GLA[18].
- The London SHLAA was designed[19] to address the then national requirements regarding sites that are '**deliverable' and 'developable'** (now relevant to NPPF para 47, footnotes to bullets 2 and 3) and to reflect the exceptional admissibility of 'windfalls' (now relevant to NPPF para 48) in the unique circumstances of the London land market (see paragraph 1.1.3 above). In the interests of prudence and due process, Boroughs are advised not to rely simply on referencing the London Plan in this regard but to also provide their own local evidence of deliverable and developable sites, updating that provided by the pan London SHLAA by drawing on their own 'five year supply' information and housing trajectories.
- This approach is particularly important for **years 1-5** for which the NPPF requires an "identified and annually updated supply of specific sites to provide five years worth of housing against their housing requirements with an additional buffer of 5% (moved forward from later in the plan period)".

17 Maher V. Report to the London Borough of Barnet on the Examination into Barnet's Core Strategy and Development Management Development Plan Policies paras 40 - 44. 22nd June 2012. Planning Inspectorate.

18 See Mayor of London. Interim Housing SPG. GLA, 2010, Annex 3

19 Mayor of London SHLAA 2009 ibid, Paras 3.1 – 3.2

- Even in this near term phase, it is realistic to expect that in the highly active London land market, some contribution to provision will come forward from sites not identified in either the London SHLAA or a subsequent local update. To ensure that credible account is taken of this, boroughs are advised to update the expected contribution of 'potential' sites and of small sites as part of their "compelling evidence" to demonstrate that **windfalls** have been a consistent source of housing capacity and are likely to continue so into the future (NPPF para 48).
- In justifying their assumptions on the contribution of small site windfalls to future provision boroughs should be mindful that the NPPF can appear contradictory on the approach to be taken to estimating that of **garden land**. The NPPF, like the London Plan, enables boroughs to resist inappropriate development of residential gardens where justified in light of local circumstances, but does not impose a blanket restriction on such development (NPPF para 53). However, it is clear (para 48) that authoritative evidence to support windfall assumptions "should not include residential gardens". Boroughs should note that London Plan housing targets discounted 90% of the historic contribution of garden development – should they wish to continue using a windfall discount at this level rather than 100% they are strongly advised to ensure that it is justified robustly in light of local circumstances.
- In testing all identified sites in London, the SHLAA process also addressed the then national concern (PPS3 paragraph 58) that **sites with planning permission** should not be included unless they can be demonstrated to be developable and likely to contribute to housing delivery at the point envisaged. Boroughs may wish to note that this was arguably a more rigorous approach than that now required by the NPPF which regards permitted sites as deliverable (rather than developable) subject to a range of tests. In providing a strategic context to support local targets, boroughs may also note that London's SHLAA based system of targets has helped to secure a pipeline of around 170,000 approved dwellings, equivalent to five years 'need' across the region. This figure is updated in the London Plan Annual Monitoring Report.
- Boroughs may also wish to note that still extant national guidance encouraging SHLAAs to be undertaken jointly by local authorities (and, indirectly, the new Duty to Cooperate[20]) is addressed by the London SHLAA being a **joint GLA/Borough** project to address London's distinct circumstances (see paragraph 1.1.3 above).
- Through its phasing provisions the SHLAA was designed to address the PPS3 paragraph 55 requirement to identify a further supply for **years 6 – 10**. This resonates with the NPPF requirement to "identify a supply of specific, developable sites or broad locations for growth for years 6 - 10". Boroughs are advised to update their inputs to the pan London SHLAA for this period. This may entail bringing forward sites previously identified for years 11 – 15 where justified, and taking particular account of the

20 CLG NPPF 2012 ibid paras 178 - 181

contributions of Opportunity and Intensification Areas – preparation of development frameworks for these Areas has been ongoing since the SHLAA was carried out and usually yields increments to development capacity. Consideration should also be given to changed local circumstances which might justify re-designating confidential 'potential' sites as 'identified' sites. In addition, to underscore their commitment to addressing NPPF housing capacity requirements, Boroughs may wish to note that they, the Mayor and other partners are currently exploring further capacity in other broad locations including town centres, industrial and office areas with further surplus business capacity and hitherto unidentified sources of 'windfall' capacity.

- The LP's general support for a 'roll forward' of annual average provision (see paragraph 1.1.3) addresses the national requirement to demonstrate provision 'where possible, for **years 11 – 15**. SHLAA output for this period should **not** be used for this purpose because London experience of carrying out similar exercises shows that this could significantly **under**-estimates future provision. At strategic level, the spatial elements of the LP itself (Chapter 2) already address the NPPF point that this period can include broad locations for future growth.
- The NPPF is intended to provide a broad framework to achieve the outcomes sought by government in the light of local circumstances. Indeed, one of the Government's objectives for the NPPF is to move away from the top down, 'one size fits all' approach of previous national guidance to one empowering planning authorities to support and encourage sustainable development to meet their housing needs. The Framework is framed carefully to make this clear. The evidence supporting LDFs must show that they meet "the full, objectively assessed needs for market and affordable housing **as far as is consistent with the policies set out in this Framework**[21]. This provides flexibility, but the parameters of the flexibility are clearly set, as also is the overall direction of travel of policy. Just as it is in the London Plan, this is to meet housing need.

1.1.11 The strategic approach outlined above is designed to provide boroughs and their partners with guidance which carries forward London Plan policy and is also robust, at least for the medium term, in addressing national objectives in the unique circumstances of London. For the longer term, the Mayor is committed to carrying out a new SHLAA to identify capacity to meet Londoners' housing requirements formally within the context of the NPPF. In the meantime, when updating Table 3.1 targets for inclusion in LDFs, boroughs should be mindful that these are **minimum** benchmarks to enable them to make a similar or greater contribution to meeting London's housing needs. The economic downturn provides an opportunity to work proactively with developers and other partners to indentify capacity to meet longer term requirements.

21 NPPF, ibid Para 47, CLG 2012

1.2 SOURCES OF HOUSING SUPPLY

1.2.1 LP Policy 3.3 requires boroughs to seek to exceed the relevant minimum borough housing average target outlined in Table 3.1. To do this, Policy 3.3 states that boroughs should identify and seek to enable development capacity to be brought forward to meet the targets. The policy emphasises the potential of brownfield capacity (especially that in opportunity and intensification areas and in growth/ coordination corridors), particularly for intensification, town centre renewal, mixed use redevelopment and sensitive renewal of existing residential areas. Boroughs are required by Policy 3.3 to identify new, and review existing, housing sites for inclusion in LDFs. The following guidance highlights sources of capacity relevant in addressing Policy 3.3.

Housing in Inner and Outer London

1.2.2 Between 1987 - 1991 net completions in outer London exceeded those in inner/central (the word "inner" is used to cover both in what follows) London. Since then completions in inner London have generally been higher[22]. Across two economic cycles 1987 – 2008 conventional dwelling output in outer London has averaged 11,000 pa against 12,000 pa in inner London[23]. While inner London looks set to remain the main contributor to new provision in the capital, until the economic down turn outer London's housing output was proportionately higher (48% 2008/9) than anticipated in the LP (43%).

1.2.3 Outer London is likely to experience considerable demographic and economic growth over the period to 2031. The LP provides the framework for well designed, well planned new housing to help maintain and enhance outer London's attractions as a place to live as well as addressing housing need. There are particular challenges in realising the housing potential of sites which have good public transport accessibility but low existing housing densities. Part 1.3 of this SPG shows how the need to respect local character can be reconciled with the broad density ranges in the Sustainable Residential Quality matrix. Part 2 puts this in a wider context, stressing the importance of integrating new development within existing neighbourhoods, enhancing the residential environment as well as creating more attractive homes. Annex 3 provides illustrations for implementing parking policy to more sensitively reflect the particular needs of neighbourhoods with low public transport accessibility. With an estimated 230 new local jobs created by every 1,000 new residents[24], new housing should also support employment growth – a particular concern in Outer London.

1.2.4 Inner London's residential areas are far from uniform. Some neighbourhoods have exceptionally high quality environments or have been affected by economic change, while others suffer from a legacy of ill-conceived or implemented development. The LP (Policy 2.9) recognises that inner London (here used to mean the area around the Central Activities Zone) requires a distinct approach, supporting appropriately located housing growth which is managed so as to help improve

22 Outer London Commission. Final Report. GLA, 2010, Annex 5B

23 Mayor of London. Inner London: context for the Draft Replacement London Plan. GLA, 2010

24 GLA Economics. More residents, more jobs? The relationship between population, employment and accessibility in London. GLA, 2005.
Batty M. More residents, more jobs….. A review of the report from GLA Economics. GLA, 2007

quality of life for both existing and new residents. In particular it should enable boroughs to tackle local pockets of social exclusion. While the density of housing across inner London varies, generally higher levels of public transport accessibility provide scope for higher density development. However, it is essential that this is built to a high standard and enhances both the public and the private realm (Policies 3.4-3.5).

Sub regional Housing Provision

1.2.5 Table 3.1 shows that that while all boroughs will contribute to future housing provision, there is particular potential in parts of East and Central London. Overall, more than half of London's future provision is expected to come from these two sub regions. East London, including the Thames Gateway Growth Area is a particular strategic spatial priority (LP Policy 1.1B), and includes a substantial number of London's larger housing sites – the Opportunity Areas of East London alone have potential capacity for over 130,000 dwellings, approximating to 42% of currently identified pan London provision. Realising the capacity of some of these sites will pose particular challenges in terms of contamination, public transport accessibility, social infrastructure provision, environmental quality and financial viability. Active partnership working will be required to bring forward their full potential. The Mayor will, and boroughs and other stakeholders should, develop cost effective cross boundary working arrangements to address the opportunities and issues associated with delivering housing sub regionally. In this regard, outer Boroughs in particular should note that NPPF paras 178 – 181 require them to demonstrate that they have discharged the Localism Act's Duty to Cooperate. The Mayor will complement this in addressing his own responsibilities to engage with neighbouring authorities under GLA legislation. The LP Annual Monitoring Report provides sub regional and more local housing benchmarks for monitoring purposes.

Housing in Growth Areas and Coordination Corridors

1.2.6 Underpinned by responsibilities under the GLA Act and now by the Localism Act's new Duty to Cooperate, LP 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). While the main thrust of this policy is to secure linkages to coordinate development and infrastructure with areas beyond London, the policy also recognises potential in London itself, picking up on one of the recommendations of the Mayor's Outer London Commission. Coordination of investment across London's boundaries will help to realise housing capacity within the Areas/ Corridors - while each Area/Corridor must be addressed in light of its own distinct circumstances and challenges, research[25] confirms that positive, partnership based working will provide the basis for more sustainable development in appropriate

25 Robin Thompson Associates and Llewelyn Davies Yeang. Study of Sub-regions and Growth Proposals in and around London. GLA, 2008

locations within these areas. The NPPF strongly supports this.

Opportunity Areas and Areas for Intensification

1.2.7 LP Policy 2.13 identifies 33 Opportunity Areas and 10 Areas for Intensification[26]. The Plan defines Opportunity Areas as typically having capacity for at least 2,500 additional homes and/or or 5,000 jobs or a mix of the two, together with appropriate provision for supporting infrastructure such as local shops, leisure facilities and schools, health and social care facilities and services. The Plan stresses that their development should realise scope for intensification associated with existing or proposed improvements in public transport accessibility, and promotes inclusive and sustainable access, including walking and cycling. Development should be linked to the wider regeneration of the hinterlands of the Areas and be closely coordinated when they cross borough boundaries. The LP anticipates that strategic partners will work with the Mayor to prepare and implement planning frameworks for each Opportunity Area. The actual form of this joint working and the status of each planning framework will vary with local circumstances but from a strategic perspective, preparation of these documents is considered a priority. Potentially, London's Opportunity Areas have capacity for over 230,000 homes approximating to 72% of currently identified provision for the capital, and experience shows that detailed planning usually yields higher capacity than initial estimates.

1.2.8 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, intensification and a more appropriate mix of uses. The Mayor will support boroughs in preparing their planning frameworks for these areas. Potentially these have capacity for some 14,000 homes approximating to nearly 5% of currently identified provision. Experience shows that detailed, partnership working on Opportunity and Intensification Area frameworks usually identifies significantly more capacity for housing and other uses than first anticipated. With this in mind, it is important that preparation of Frameworks which are still outstanding should be completed as soon as possible and that advantage should be taken of the current economic downturn to proceed to implementation at the earliest opportunity.

Brownfield including Surplus Publicly Owned Land

1.2.9 The London Development Agency (LDA) originally compiled a pan London database of brown field sites bigger than 0.1 ha, many of which have potential for housing development (The London Brownfield Sites Review). This database is available at http://www.londonbrownfieldsites.org/Content/home.aspx (it is understood it may be incorporated in NLUDS). It includes sites identified in government's register of surplus publicly owned land, those identified by boroughs, the GLA's own brownfield land holdings and Transport for London's (TfL) non-operational brownfield land. Boroughs may find this a useful source when compiling their rolling five year supply of sites required by the NPPF. The Framework

26 Opportunity and Intensification Areas are shown in the LP 2011 (ibid), Map 2.4, pages 48-49 and detailed in Annex 1 including minimum housing capacity. Progress on associated development frameworks is summarised in the London Plan Annual Monitoring Reports.

also encourages development on land of lower environmental quality. National policy[27] places particular emphasis on use of surplus publically owned land for affordable housing provision, and emerging guidance suggests it could also be important in underpinning institutional investment in the private rented sector[28].

Town centre renewal and other Mixed Use Development

1.2.10 Further guidance on housing led or enabled mixed use development including in town centres, CAZ and on surplus industrial and office capacity is set out in Section 7 of this SPG.

More specific sources – Small sites

1.2.11 LP Policy 3.3 recognises that housing from small sites will continue to be an important source of London's new homes, providing some 22%[29] of future provision. However, there is concern that in some circumstances, and especially where proposals for back garden development (see below) are involved, these have not always met other relevant LP policy requirements, especially those to secure the quality of the residential environment. The sections of this SPG dealing with density (see para 1.3.39) and affordable housing thresholds (see paras 4.53 – 4.58) provide guidance to encourage sensitive realisation of small site capacity in different types of location. Small sites may be particularly important in addressing government and Mayoral policy to encourage development of 'Custom Build' and 'Community Right to Build' homes[30].

Residential conversions

1.2.12 In the early 1990s, conversion of houses to smaller flats represented nearly a third of London's housing capacity and was especially important in inner London[31]. Since then conversions have reduced in importance, though they will continue to make a significant net contribution to housing output in appropriate locations.

1.2.13 Both planning policy and market forces can constrain realisation of potential residential conversion capacity (through over-onerous parking policy requirements or because of growing demand from people willing to bid for more spacious accommodation, for example). Conversely, in some neighbourhoods where conversion pressures are particularly acute, proposals may lead to over development, so compromising local residential amenity[32].

1.2.14 A balance has to be struck between realising the potential of residential conversions, especially to meet the needs of smaller households, and sustaining the residential quality of those neighbourhoods where pressure for conversion is particularly intense. Across the capital as a whole, the pan London SHMA identifies a surplus of large private houses. Where this is confirmed at local level, the planning system can support their conversion into attractive smaller units, while ensuring

27 Communities and Local Government, Homes and Communities Agency. 2011 – 2015 Affordable Homes Programme – Framework (CLG Framework) CLG, 2011

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

29 Mayor of London. Strategic Housing Land Availability Assessment and Housing Capacity Study 2009. GLA, 2009 (Small sites have the potential to contribute 7,400 units per annum out of the 32,200 total)

30 CLG, HCA. Custom Build Homes Fund Prospectus. HCA, 2012
Mayor London. Build Your Own Home – the London Way. Supporting Custom Build Housing and Community Right to Build. Funding Prospectus. GLA, 2012

31 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

32 Llewelyn Davies, University of Westminster, Urban Investment Partnership, Nottingham Trent University. Conversion and redevelopment. Processes and potential. DETR, 2000

appropriate safeguards for local amenity. Para 2.1.14 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'[33].

1.2.15 As a general principle, locally restrictive policies, including those based on 'conversion quotas', should not be applied along transport corridors or within reasonable walking distance of a town centre without a robust justification. This provides flexibility for boroughs to address exceptional local circumstances where application of the principle would not be appropriate. Maximum parking requirements are shown in LP Table 6.2 and Annex 3 illustrates how the standards might be applied to take better and more sensitive account of local circumstances in areas with low public transport accessibility. Controlled parking arrangements and restraints on pavement cross-overs for off-street parking should not be used to restrain conversion activity that conforms with strategic parking policy. Local guidance should be produced to ensure that garden parking does not detract from the streetscape or have negative impacts on biodiversity and aspects of climate change such as exacerbating flood risk[34].

1.2.16 In estimating the net supply from conversions, account needs to be taken of the loss of dwellings from de-conversions. This should be monitored. The conversion of two small dwellings in the social housing sector into a larger dwelling may be necessary to respond to overcrowding and to deal with an under supply of larger dwellings. Equally, in some neighbourhoods, especially in parts of central London, re-conversion of smaller private units into larger dwellings can reduce capacity to meet the requirements of small households and may be resisted to address identified housing needs. In some cases, property built for residential purposes may have been converted to non-residential use. Given changes in relative demand for residential and non-residential provision in some locations, consideration could be given to re-conversion for residential use.

Private garden land development

1.2.17 Private garden land is the enclosed area within a dwelling curtilage from which the public is excluded. The loss of private garden land, especially of back gardens, to infill residential development, highlights the need for a more coordinated and consistent support at the strategic level for the protection of garden land where the existence of a threat can be evidenced locally. There is evidence from a number of studies[35] of the local impact of such development and LP 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 is supported by NPPF para 53, with NPPF para 48 making clear that SHLAA allowances for windfall sites should not include residential gardens. This section of the SPG provides

33 The Mayor is working with Boroughs, Government, LFEPA and other agencies to administer resources addressing the issue of 'beds in sheds'.
34 Communities and Local Government, Environment Agency. Guidance on the permeable surfacing of front gardens. CLG/Environment Agency, 2008
35 Mayor of London. Strategic Housing Land Availability Assessment and Housing Capacity Study 2009. GLA, 2009, Para 3.53 and Communities and Local Government. Garden Developments: Understanding the issues - an investigation into residential development on gardens in England. CLG, January 2010

guidance on the implementation of LP Policy 3.5 and more general policies providing strategic support for garden land protection.

1.2.18 Gardens can play a number of important roles:

- defining local context and character including local social, physical, cultural, historical, environmental and economic characteristics,
- providing safe, secure and sustainable environments and play spaces,
- supporting biodiversity, protecting London's trees, 'green corridors and networks', abating flood risk and mitigating the effects of climate change including the 'heat island' effect, and
- enhancing the distinct character of suburban London.

1.2.19 These are strategic concerns of the LP and Policy 3.5 accordingly enables and supports boroughs in establishing presumptions against development on private garden land where locally justified.. This has been taken into account in setting the Plan's housing targets which have discounted assumptions based on the historic contribution of garden land towards provision by 90%.

1.2.20 A number of LP policies address the roles that gardens play in London, but in generic terms. They can be used to provide further strategic support for local policies and decisions which in appropriate circumstances, seek to resist development on private garden land.

1.2.21 Private garden land is an important component of what the LP terms 'physical context' and 'local character' (Policy 3.5). This policy is reinforced by the qualitative concerns of Policy 3.4 (Optimising housing potential) and by links to other urban design and environmental policies (see links between Policies 2.4 and 7.1-7.8, 5.3). As is made clear elsewhere in this SPG (paragraphs 1.3.12 and 1.3.13), Policy 3.4 and Table 3.2 should not therefore be applied mechanistically to justify intensification of residential areas.

1.2.22 Policy 7.4 requires development to have regard to the form, function and structure of areas, places or streets. Gardens can clearly be very much part of the form, function and structure which warrants respect and protection.

1.2.23 Similarly, in coming to a view on proposals which entail the loss of gardens, account should be taken of the degree to which the latter contribute to communities' sense of place and quality of life (Policy 3.5), especially in outer London where they are a key component of its distinct attractions (Policy 2.6 and 2.7). Account should also be taken of the way in which gardens can enhance biodiversity (Policy 7.18/7.19) including 'green corridors', protect trees (Policy 7.12), abate flood risk (Policies 5.12 and 5.13) and address the effects of climate change, including 'heat island' effects, and the use of green networks to create 'breathing spaces' (Policies 5.9 - 5.11).

1.2.24 Boroughs and developers are advised to consider proposals for development in gardens in the light of local circumstances, particularly the value they have in addressing the strategic objectives set out above, and to strike an appropriate balance between these and other objectives when seeking to optimise housing provision on

a particular site. Within the context of statutory permitted development rights[36] (which normally only affect residential extensions), these wider objectives are generally likely to outweigh those flowing from the small increment to overall housing provision which usually results from garden development.

1.2.25 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 (7.18/19).

Other small infill developments

1.2.26 Like back gardens, other types of small infill opportunities within existing residential areas must be approached with sensitivity. Some are highly valued, well maintained and contribute to the context and character of a neighbourhood. On the other hand, redevelopment of others with degraded environments can make a positive contribution to local amenity as well as increasing housing output (neglected mews and back garages, for example[37]). There may also be potential to provide individual homes on other smaller spaces that have been overlooked by conventional capacity studies but can make a cumulative difference to overall provision eg through 'custom build[38]'. These can also be a cost-effective way of regenerating local neighbourhoods and creating more mixed and sustainable communities.

1.2.27 In considering scope for infill development, particular account should be taken of the need to respect local character and:

- the potential for site assembly and comprehensive or coordinated development;
- present and potential accessibility;
- potential plot depths;
- overlooking/day lighting; and
- the ability to complement local context[39].

1.2.28 As these are usually very small scale developments, the density of development should take particular account of local character in the context of the principles underlying Policy 3.4 rather than being based only on the density matrix itself (see also para 1.3.39 below). The Outer London Commission's density study[40] provides further illustrations on how 'optimisation' policy bears on back land development.

1.2.29 In framing local back land protection policies and estimating the phasing of future capacity, potential infill sites should be distinguished between those which might be developed in the short term, and those that require a longer time scale to bring forward. Those which are not well used and where environmental quality has been eroded (especially where this has become a nuisance to local residents)

36 Especially those rights falling within Classes A, E, F and G of Part 1 of Schedule 2 to the Town and Country Planning (General Permitted Development) Order 1995 (SI 1995 No. 418) as amended.

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

38 Mayor of London. Build Your Own Home 2012 ibid
HM Government. Laying the Foundations. A Housing Strategy for England. CLG, 2011

39 Llewelyn Davies. LPAC, 1997, ibid

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

should be considered for early action. The Mayor will work with boroughs and other relevant agencies to identify and establish any distinct mechanisms and incentives which may be required to realise the potential of these sites (e.g. problems of multiple ownership).

Non self-contained accommodation

1.2.30 Household spaces in non self-contained (NSC) accommodation count towards overall housing provision targets. NSC can include student accommodation, nurses' hostels and shared housing for other client groups (including special needs housing), and houses in multiple occupation (see 3.1.16 below). For monitoring purposes, NSC accommodation has been disaggregated from the overall housing provision targets in Annex 4 of the LP. Conversion of NSC accommodation into self-contained accommodation will normally result in a loss of provision and should be recognised when monitoring conversions.

1.2.31 NSC accommodation plays a strategically important if not always fully recognised part in meeting the needs of different groups of Londoners and can pose particular challenges to housing providers as well as planners. For example, some NSC occupants have difficulty in gaining access to mainstream housing. Some elements of the NSC stock are relatively low value and vulnerable to loss through market pressures, as well as raising quality concerns. New provision can raise specific issues - though new output in recent years has averaged 2,000 household spaces pa, 90% has been for students, raising questions as to its impact on capacity for other parts of the housing market, especially in inner London – LP Policy 3.8 Bg makes clear that it should not compromise capacity for conventional homes. The LP (and in particular Policy 3.8) recognises the importance of meeting specialist needs and the ways in which different forms of NSC may address them (see LP paras 3.44 - 3.57).

Flats above shops

1.2.32 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, especially those associated with older buildings, are under-occupied or vacant. This can be because of tenure, management, access and other factors including long-term structural change in the retail market. Though there is expected to be an overall increase in demand for new retail space, there is also likely to be a contraction in demand for older space and smaller units, especially in marginal locations such as secondary frontages and smaller centres.

1.2.33 The NPPF (para 23) supports the Plan in seeking to realise town centre housing potential. Modernisation/redevelopment of flats above shops, possibly at higher densities, and the conversion of surplus commercial space should be coordinated through wider town centre rejuvenation frameworks (see Part 7.4 of this SPG) to ensure sufficient secondary and tertiary frontage capacity is retained for essential community, workshop and service uses. The Empty Homes Agency can provide advice on good practice in bringing underused and vacant upper storeys back into active residential use and town centre health checks can be used to identify

potential housing capacity above shops.

Airspace developments over existing and new non-residential premises

1.2.34 As well as smaller scale sources of capacity associated with high street frontages and shops, there is potential capacity associated with the airspace above relatively low density commercial uses, especially in locations with good public transport access such as town centres. These uses can include car parks, filling stations, showrooms, repair depots, self-storage uses, schools, public sector depots, leisure facilities, fire stations and a range of retail outlets[41]. Use of airspace for housing provision should not compromise the existing primary use. In considering the viability of such provision, account should be taken of commercial lenders perceptions of risk associated with it.

1.2.35 Developers have already highlighted the housing potential of airspace above car parks, including those associated with local authority leisure facilities and hospitals. The redevelopment of existing supermarkets and their car parks can theoretically be a significant source of additional housing capacity[42]. However, operational factors indicate that while this is true in some situations, in general terms, housing provision above new rather than existing supermarkets is likely to be more practicable. To maximise housing potential, boroughs should explore the possibility of incorporating new housing in both new supermarket developments and re-development of existing supermarkets, so long as they do not compromise the 'town centres first', parking and affordable housing policies of the Plan. Developers and retailers are gaining expertise in this field and the Mayor supports the principle of airspace development. Positive partnership working is needed to bring forward these proposals. An effective management framework to resolve tensions between uses on the sites is usually essential.

Live-work units

1.2.36 In principle, live-work units represent a sustainable form of urban living, providing the closest integration of home and work places. With this in mind, boroughs have in the past treated them as a special case and released business space which, in some cases, would otherwise have been protected. Some of these releases have been relatively tightly clustered in the CAZ fringe and have had a locally significant impact on business space provision. This has raised tensions not just with business space policy but also with business/residential tax rating, car-parking standards and, for the occupiers, with perceived constraints on re-sale values and opportunities.

1.2.37 The LP seeks to provide a variety of dwellings and opportunities for more sustainable forms of urban living. This includes live-work accommodation. However, in view of the realities of the use of live work units, proposals for future development should be considered carefully in the context of strategic and local business/industrial space policy, especially the pressure in certain parts of London on small business/industrial land locations (Policies 2.17, 4.4). A degree of flexibility will be required depending on local circumstances.

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

42 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

1.2.38 In some circumstances, the provision of homes will be the paramount concern, while elsewhere retaining business capacity will be more important. Given the need for careful management of London's remaining stock of industrial capacity[43], the consequences of introducing residential uses into predominantly industrial areas for which there is identifiable demand will be an important consideration. Conditions and planning agreements to secure live-work (including those affecting parking) should provide a disincentive to inappropriate 'pure' residential occupation, and mechanisms for monitoring and enforcing compliance with planning conditions should be put in place. In considering demand for live-work accommodation account should be taken of the flexibility in the planning system enable working in existing homes.

Vacant Dwellings

1.2.39 The need to encourage the return of long term vacant dwellings to active housing use is recognised in the SHLAA, supported by government and addressed in para 5.1.6 of this SPG under 'Empty Homes'.

1.3 OPTIMISING HOUSING POTENTIAL

1.3.1 One of the new themes of the 2011 LP is 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 maximising, housing potential. Of particular importance are respect for local context, good design and public transport capacity. Other relevant factors include access to social infrastructure, open space and play provision. Qualitative improvements do not have to be at the expense of increased output – scope will remain to enhance densities in situations where transport investment will improve transport accessibility so that development can be more sustainable. This balanced approach to optimising output is supported by the LP'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[44]'.

POLICY 3.4 OPTIMISING HOUSING POTENTIAL

Strategic, LDP preparation and Planning Decisions

- Taking into account local context, 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

43 Mayor of London. Land for Industry and Transport Supplementary Planning Guidance. GLA, 2012

44 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 LP 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.

1.3.2 Given London's constrained land supply, the Mayor considers it essential that the LP sets out strategic density policy for the region[45]. The Plan's approach to this policy was originally pioneered by the boroughs to secure 'sustainable residential quality' (SRQ) – a broad concept which includes density but integrates it with wider environmental, transport and social objectives and resonates closely with the NPPF approach to sustainable development as well as its more specific guidance on density[46]. It has been refined and tested at EIPs over a decade[47] and as expressed in the LP (see above) 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 respect for local context) through policies 3.5, 7.1, 7.2 and 7.4;
- optimising the relationship between transport and land use to secure sustainable development - a fundamental tenet not just of the LP (Policies 6.1 – 6.3), but also of national planning policy[48], and
- the density guidelines themselves, which also reflect these objectives. They are expressed as wide and appropriate ranges set out in a density matrix (LP Table 3.2 – see below) in order to accommodate local variations in three broad types of urban setting and public transport accessibility. They are designed both to cover the range of development situations found across London and to be sensitive to local circumstances, including the need to accommodate homes of different sizes. To reinforce this they are expressed in terms of habitable rooms per unit and hectare as well as the more conventional 'dwellings per hectare'.

1.3.3 Because of the way the policy has been implemented in the past, its outcomes have not always been in line with all the Plan's objectives. To ensure consistency in boroughs' approach to realising development potential, Policy 3.4 makes clear that it seeks to '**optimise**' housing potential rather than 'maximise' which was an objective of the 2008 Consolidated London Plan. The reasons for this policy change are:

- some developments have been brought forward which do not adequately respect local context;
- some developments have not adequately reflected other policy objectives (in terms of dwelling mix, for example) ; and,
- some densities have simply been above the relevant guidelines without considering fully the implications for wider policy objectives.

1.3.4 These unintended outcomes are due to a variety of factors, not least the dynamism of the London housing market which has borne particularly on the density of some private sector developments. In some cases, undue weight has been attached to only one part of the policy (Table 3.2 – the density matrix) when coming to a view on densities suitable for a particular site.

1.3.5 It became apparent during consultation

45 PPS3 (op cit), paragraph 45
46 CLG NPPF 2012 ibid paras 47, 58
47 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
48 CLG NPPF 2012 ibid paras 6-9, 29-30

on the draft of this SPG that there were differences in some stakeholders' perceptions over what density means in land use planning terms. These crystallised around three sets of concerns :

- The bearing of density on quality of life for occupiers of new developments. When examined in detail, these concerns were found usually to stem not from density per se but from those to secure adequate social, environmental and physical infrastructure; other local amenities; reasonably sized homes; adequate private open space and even the affordability of homes. All these 'quality' matters are the subject of separate planning policies, and their implementation will bear on the overall density of development, either directly in terms of demands for space or indirectly through their effect on development viability. Thus, simply in this sense, density can be considered to be an outcome of policies intended to address these concerns rather than a concern in its own right.
- The bearing of density on quality of life for occupiers of neighbouring properties through the way new development relates to surrounding land uses. Again, when examined in detail these concerns were usually found to stem not from density as such, but from issues like massing and design which are subject to separate polices – density can be considered one of the outcomes of implementing these policies.
- Finally, the way density is used strategically to inform assessments of development capacity. In this context it is normally used only as a general starting point in the process and its outcomes are qualified by consideration of a range other factors like access to social and physical infrastructure and amenities, and local context and setting.

1.3.6 While it is accepted that development density was a significant issue in its own right in the past when, say, physical proximity of homes was a real problem in terms of public health and the spread of contagious disease, nowadays it 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 consultants[49] 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. Anyone grappling with the thorny issue of density tends to go round in circles – moving between these two extreme positions"*.

1.3.7 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 respecting local character. Thus, the London Plan includes a density matrix as only one part of a wider policy to optimise

49 Maccreanor Lavington et al 2012 ibid

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. Development at densities outside these ranges will require particularly clear demonstration of exceptional circumstances (taking account of relevant LP policies and the considerations outlined in paragraphs 1.3.41– 44)

1.3.8 Thus, it is essential that 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 LP (policies 7.1-7.3) 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 (see para 1.3.41), they should normally be resisted.

1.3.9 Conversely, greater weight should not be given to local context over location or public transport accessibility unless this can be clearly and robustly justified (see para 1.3.44). 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.

1.3.10 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 LP and expressed in DPDs is very properly a local matter.

The London Plan density matrix

1.3.11 Sustainable and successful higher density housing depends on a complex range of factors including the 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 characteristics[50].

1.3.12 LP 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. Similarly, Policy 3.4 and Table 3.2 are critical in assessing individual residential proposals but their inherent flexibility means that Table 3.2 in particular should be used as a guide rather than as an absolute rule so as to also take proper account of other objectives, especially for dwelling mix, environmental

50 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

and social infrastructure, as well as local circumstances, such as improvements to public transport capacity and accessibility.

1.3.13 Exceptionally, higher or lower densities on individual developments may be acceptable where these can be clearly and robustly justified by local circumstances (see paragraphs 1.3.41-1.3.44 below). Local policies should be cast in terms of Policy 3.4 and Table 3.2 rather than seeking to 'plan by exception' i.e. policy should be based on broad strategic guidelines not on exceptions to it. 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. Further guidance on implementation of different elements of the Policy/Table is set out below.

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

Indicative Average Dwellings size	Setting	Pubic 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**
	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

Density definitions

1.3.14 The LP defines density in terms of net residential site area[51]. 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. 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 and 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 LP expresses density both in terms of dwellings and, to take better account of the needs of different types of household, habitable rooms per hectare.

1.3.15 Different forms of development can have similar densities. High density does not have to mean higher rise development, and there are many studies[52] that explore how high density schemes can provide good quality, attractive housing and ensure the most efficient use of land. 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 ago[53]. 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 study[54] provides up-to-date, good practice illustrations and detailed advice specifically on implementation of LP Policy 3.5, including case studies of different forms of development at different densities in different types of setting/location.

Density and dwelling type

1.3.16 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 including the London Strategic Housing Market Assessment (SHMA)[55] which highlights the importance of additional affordable provision for families. Family housing is generally defined for planning purposes as having three or more bedrooms. Two bedroomed dwellings with nominal space for four persons would not normally be considered appropriate for families.

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

52 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

53 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

54 Maccreanor Lavington et al 2012 ibid

55 Mayor of London. Strategic Housing Market Assessment. GLA, 2008.

1.3.17 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 for town centres and as an element of mixed-use developments, where open space and car parking may be limited (see Part 7.4 of this SPG). 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 (see also Part 7 of this SPG).

1.3.18 Lower density developments lend themselves more, though not exclusively, to family housing. The LP density matrix assumes a higher number of habitable rooms per dwelling for lower density developments. This generally makes them more appropriate for higher proportions of social rented affordable housing, given the particular need for family social housing provision, which in turn will require a higher level of provision of open areas and play space. Schemes should be designed to maximise tenure integration and all affordable housing units should have the same external appearance and entrance arrangements as the private housing[56]. Developers and housing associations should have regard to the policies on design set out in LP Policy 3.5 and the minimum space standards for new development listed in table 3.3 and relevant policies in LP Chapter 7. Part 2 of this SPG provides further guidance on the application of Policy 3.5.

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 similar spaces are excluded from this definition". Kitchens are usually excluded. However, 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 policy to increase overall housing provision and maximise that of affordable housing, especially in parts of central London, can be compromised by development of particularly large dwellings (measured in square metres rather than habitable room/ hectare). In cases where this does not lead to optimising output on a particular site, it may be more appropriate to estimate appropriate levels of provision on the basis of floorspace rather than numbers of units. To inform this boroughs may wish to take into account the minimum space standards in LP Table 3.3. The Mayor will, and boroughs are advised to, take this approach when developing benchmarks to assess reasonable contributions to

56 Mayor of London LP 2011 ibid, Para 3.76

affordable housing provision (LP paragraph 3.78 and para 4.5.8 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 LP 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 2011, 2016 and 2026 as well as sub-regional capacity and congestion maps. These should be taken into account when taking planning decisions on major sites[57]. 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. LP 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

57 Mayor of London LP 2011 ibid, Policy 3.7

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). The Framework goes on to make clear that "Pursuing sustainable development requires careful attention to viability and costs in plan-making and decision-taking". Furthermore, "to ensure viability, the costs of any requirements likely to be applied to development, such as requirements for affordable housing, standards, infrastructure contributions or other requirements 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 deliverable"(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 LP 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 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 study[58] 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.

58 Maccreanor Lavington et al 2012 ibid Section 7 J

Setting

1.3.29 Defining the setting of an area requires local knowledge and may entail an element of professional judgement. 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 2011 LP:

- 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 Paragraph 1.3.23 above explains the flexible approach for boroughs to refine local approaches to implementation of Policy 3.4 in their LDFs.

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 where the character of the existing area is as described above in para 1.3.24. 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 distance and has its roots in research[59] which introduced the concept of 'Ped-Shed' areas that connect town centres with their hinterlands. 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 best inform this, the LP 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.

59 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

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 below. 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 large sites, including many Opportunity and Intensification Areas, can define their own setting. 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. As a broad generality, 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. Of particular relevance to large site development is research[60] 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 facilities[61], which in turn supports 'place shaping' to which local communities can relate. Such sites need to support the principle of creating 'walkable neighbourhoods'.

1.3.36 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 in these, is noted in paras 1.3.24, 1.3.38 and 1.3.47

Sites on borders and edges of 'settings'

1.3.37 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 will increase certainty along these borders and avoid high density developments spreading in an uncontrolled way into lower density areas and vice versa – an important part of 'place shielding' as well as 'place shaping'. 'Place shielding' entails managing the interface between different places where new buildings on the edge of a site can protect 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. 'Place shaping' means the use of wider planning, housing, economic development and management tools to create a successful place, or more specifically, as the management of uses and the shaping of massing, building height and the layout of routes and urban scale at a neighbourhood scale.

60 URS, Patel Taylor. London Plan Density Matrix Review. GLA, 2006
61 Llewellyn Davies. Sustainable residential Quality: exploring the housing potential of large sites. CON 68. LPAC, 2000

Undeveloped Areas/Areas with Indeterminate Character

1.3.38 There are still large parts of London that are currently substantially undeveloped or have for other reasons 'no definable character'[62]. This is especially the case in East London or 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 (LP) and local (LDF) proposals for these areas;
- public transport considerations (current and planned accessibility, connectivity and capacity);
- their location (i.e. the distance to the closest town centre), and planned future setting; and
- scope for mixed use development, especially to contribute to place shaping.

Small Sites

1.3.39 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 should be developed towards the lower end of the appropriate range, unless detailed urban form analysis suggests otherwise. 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 respect local context.

1.3.40 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 this[63]. 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.

Developments above the density ranges

1.3.41 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 3.4 but also other policies which are relevant to exceptionally high density development. These include different aspects of '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'. It is particularly important to take account of its impact in terms of massing, scale and character in relation to nearby uses – design should be exemplary. Such

62 URS, Patel Taylor 2006 ibid

63 Llewelyn Davis et al 1998 ibid

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 Commission[64] notes, "exceptions to the (density) ranges should be just that, whether above or below the appropriate range, and must be justified robustly".

Developments below the density ranges

1.3.42 The LP recognises that[65] 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 LP and earlier in this document to make optimum use of London's scarce land resources.

1.3.43 One of the few parts of the capital which may be 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 character[66]. 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 the Policy 3.5 to give particular weight to respecting the lower densities which support the distinct character of these areas relative to that accorded to the indicative density benchmark itself. In each case, this should be demonstrated to be appropriate by having regard to LP policies and guidance in this document. Para 1.3.51 provides further guidance on the flexibility in parking policy to address the distinct circumstances of these locations.

1.3.44 In refining the matrix for local application through LDF 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 very broad and are designed to accommodate the range of settings commonly found in different parts of London. Other than in managing development in agreed parts of suburban outer London with very low PTALs (see para 1.3.43 above), proposals for development below the ranges should be addressed as exceptions to policy and tested rigorously 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.

64 Outer London Commission 2012 ibid para 8.24

65 Communities and Local Government. Planning Policy Statement 3 Housing. Amended June 2010. Changes to PPS3 in respect of private residential gardens and housing density. CLG, 2010

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

Social Infrastructure and Amenity Space Requirements

1.3.45 Planned as well as existing social 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. Where additional needs, such as those for schools, health care or amenity space cannot be met by existing infrastructure and cannot be provided satisfactorily by off site provision, the infrastructure required to satisfy the demand should be provided on the site. This might result in a reduction across the site for the proposed density range. Conversely, in areas with particularly high accessibility, consideration should be given to capitalising on this to make higher density provision for smaller households. In exceptional circumstances a 'ring fenced', financial contribution in lieu of such provision may be appropriate, to be invested on an identified site.

1.3.46 The LP requires larger development proposals to be subject to planning frameworks (see Part 2 of this SPG). The Mayor already provides specific guidance on play[67], open space[68], health and education provision (see Part 6 of this SPG[69]). Government also provides more general guidance on social infrastructure provision for large developments[70].

67 Mayor of London. Providing for Children and Young People's Pay and Informal Recreation. Supplementary Planning Guidance. GLA, March 2008

68 Mayor of London/CABE Space. Open Space Strategies Best Practice Guidance. GLA, 2009

69 More detailed guidance on social infrastructure will be provided in the Shaping Neighbourhoods SPG

70 Advisory Team For Large Applications (ATLAS), CLG, English Partnerships, Planning Advisory Service. www.atlasplanning.com. ATLAS, 2008

Mixed Use

1.3.47 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[71]. 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 para 1.3.14 definitions, and worked example p42). Where schemes have a substantial proportion of non-residential uses eg more than 30% - 35%, the density matrix can usefully be complemented by plot ratio in addition to calculating density. In calculating plot ratio for these purposes, the total floorpsace of all uses (measured as GIA) should be divided by the net site area. In addition;

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

71 URS, Patel Taylor 2006 ibid

The Outer London Commission's density study[72] provides a worked example of this process.

Design

1.3.48 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 LP Chapter 7. 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 setting. In such exceptional circumstances, departures from Policy 3.4 must be justified robustly. In respecting local character LP Policy 3.4 resonates with section of 7 the NPPF. It requires a thorough appreciation of the 'defining characteristics' of a neighbourhood; of what will add to its quality and sense of place; of the need to optimise its development potential; to respond to local history; create safe and accessible environments and be visually attractive as a result of good architecture. However, it does not seek to "impose architectural styles or particular tastes and should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles". It does seek to promote/reinforce local distinctiveness.

Levels of car parking

1.3.49 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 LP).

72 Maccreanor Lavington et al 2012 op cit page 162

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: 2003 u/ha (575hr/ha)

1.3.50 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 uses[73]. 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 itself[74].

1.3.51 However, car ownership (if not its frequent use) is something which many Londoners value. Like the NPPF[75], the Plan recognises this in its central axiom to look at development alongside transport capacity. 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 (LP para 2.36). The Mayor asked the Outer London Commission to 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 below.

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

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

75 CLG NPPF 2012 ibid paras 39 - 40

Scheme: Highbury Gardens, Credit:JRS

PART 2

QUALITY

2.1 INTRODUCTION

2.1.1 This section of the SPG supports the NPPF in seeking "to deliver a wide choice of high quality homes". It recognises "Government attaches great importance to the design of the built environment" and 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". The SPG takes up Government's suggestion to "consider using design codes where they (can) help deliver high quality outcomes"; "avoid(s) unnecessary prescription or detail" and does "not attempt to impose architectural styles or particular tastes and (does) not stifle innovation, originality or initiative … (it does)… however seek to promote or reinforce local distinctiveness"[76]. It does this in the context of more recent advice on streamlining standards from Government[77] and the Local Housing Delivery Group[78] and has brought together and codified a wide range of standards and guidance previously set out in the London Plan[79] and other documents[80].

2.1.2 From the outset the Mayor has been 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"[81]. The 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.

2.1.3 His aim is to deliver new housing 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. London's population is projected to grow to 8.8 million by 2031, underpinning a continued high requirement for housing. London also aspires to world leadership in tackling climate change. It should also see gradual economic recovery. In face of these challenges, the Mayor considers that it is possible and necessary to address growth demands whilst ensuring buildings meet the highest design standards, helping to foster sustainable communities and protecting and improving the environment. The Mayor is clear that his commitment to increase housing supply in London must not be met at the expense of quality. This approach was upheld at the Examination in Public into the Draft Replacement London Plan which was informed by a pre-consultation version of this section of this SPG.

2.1.4 Over the last decade the quality of housing developments in London has been variable. Too many fell short of previous London

76 CLG. National Planning Policy Framework (NPPF). CLG 2012 paras 59 - 60

77 Secretary of State for Communities and Local Government. Ministerial Statement on Housing and Growth 6.9.12. DCLG, 2012

78 Local Housing Delivery Group (Standards Working Group). A review of local standards for the delivery of new homes. LHDG, 2012

79 Mayor of London. The London Plan 2011 ibid: policies 3.6 (play), 3.7 (large developments), 5.1 (climate change mitigation), 5.2 (CO2), 5.3 (sustainable design and construction), 5.4 (retrofitting), 5.5 – 5.6 (decentralised energy),5.7 – 5.7 (renewable/innovative energy), 5.9 – 15 (climate change adaptation : overheating, greening, green roofs, flood risk, drainage, water quality & use,) 5.16 – 18 (waste), 5.20 construction waste), 5.20 aggregates). 5.21 (contaminated land), 5.22 (hazardous installations), 7.1 (neighbourhoods), 7.2 (inclusive environments), 7.3 (designing out crime), 7.4 (local character), 7.5 (public realm), 7.6 (architecture), 7.7 (tall buildings), 7.8 (heritage), 7.9 (heritage led regeneration), 7.10 (world heritage sites), 7.11 - 12 (view management), 7.13 (resilience), 7.14 (air quality), 7.15 (noise), 7.18 (open space), 7.19 (bio-diversity)

80 Eg Mayor of London. London Housing Design Guide. Interim Edition (LHDG), LDA, 2010. Mayor of London, CABE. Open Space Strategies – best practice guidance. GLA, 2008 (currently subject to review). Mayor of London. SPG. Providing for Children and Young Peoples' Play and Informal Recreation, GLA, 2012. Mayor of London. SPG. Sustainable Design & Construction (currently under review). Mayor of London. Best Practice Guidance Wheelchair Accessible Housing. GLA, 2007. Also Lifetime Homes, CABE, BRE,DEFRA, HCA, Code for Sustainable Homes etc

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

Plan design quality objectives, and only a small proportion were assessed by CABE[82] as being 'good' or 'very good'.

2.1.5 Until recently, strategic minimum space standards were applied only to new, publicly funded homes, including those of the Homes and Communities Agency[83]. However, the LP now recognises that design quality is a fundamental issue for **all** tenures and that the size of housing[84] is a central issue affecting quality. New homes in London have the smallest room sizes in Europe[85], and addressing this will be a fundamental challenge for the house building industry.

2.1.6 The Mayor's London Housing Strategy (LHS) [86] focuses on affordable housing provision and highlights the importance of improving design quality, space standards and the design process to support this. Implementation[87] of the LHS is informed by the London Housing Design Guide[88] (LHDG). The LHDG applies only to publicly funded housing development and that on GLA owned land. Although it does not have formal status in the planning system, it can, in itself, be used more generally as best practice. It has informed the standards proposed in the London Plan for all housing tenures and guidance on their implementation for planning purposes set out in this SPG.

82 Commission for Architecture and the Built Environment. Housing Audits. CABE, 2004 to 2007.
83 Housing Corporation. Design and Quality Standards. Housing Corporation. 2007, and
Quality Standards. English Partnerships, 2007. http://www.homesandcommunities.co.uk/
84 HATC. London Housing Standards 2009/10. A report for the GLA. GLA, 2012
85 HATC Limited. Housing Space Standards. GLA, 2006.
86 Mayor of London. The London Housing Strategy. GLA, 2010
87 See also 'A new London Vernacular' in Mayor of London. Build Your Own Home – The London Way. Supporting Custom Build Housing and Community Right to Build. GLA, 2012
88 Mayor of London. London Housing Design Guide. Interim Edition (LHDG). LDA, 2010

POLICY 3.5 QUALITY AND DESIGN OF HOUSING DEVELOPMENTS

Strategic and LDF preparation

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

D Development proposals which compromise the delivery of elements of this policy may permitted if they are demonstrably of exemplary design and contribution 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.

2.1.7 Most of the Plan's housing standards are in fact already LP policy requirements or devolve from other relevant guidance (see paragraphs 2.17 – 19 and Annex 1 below). 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. In line with the NPPF[89], the standards have been subject to an independent impact assessment[90] and were incorporated in a wider viability appraisal of SHLAA housing capacity[91]. These studies suggest that they may generate additional costs in the short to medium term, especially when applied to existing development formats, but that costs will fall as development formats are refined to take the standards into account. The impact of the standards on physical capacity is not expected to be significant. The results of these exercises have been tested against the overall results of the SHLAA and indicate that the proposed LP provision target of 32,210 dwellings pa is robust.

2.1.8 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, should take account of the whole range of policy concerns bearing on a particular site. To provide clarity in this context, the standards have been prioritised (see 2.1.9 – 2.1.11 below). Given the importance to our quality of life of the amount of space in homes, the Mayor attaches particular priority to improving space standards and these are also specified in the Plan itself.

2.1.9 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 broken down into two types and summarised in Annex 1.

2.1.10 **"Baseline" standards** are those endorsed by the Mayor as addressing issues of particular strategic concern. Together they set the baseline for quality and design that new homes should meet. The extent to which proposed developments depart from this baseline should be taken into account in planning decisions. Those which depart significantly, either in terms of failure to meet with a number of baseline standards,

89 CLG NPPF ibid paras 173 - 174

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

91 BNP Paribas and Atkins. Strategic Housing Land Availability Assessment (SHLAA) and Housing Capacity Study (HCS) Viability Assessment. GLA, 2010

or the extent of failure to meet particular baseline standards, are unlikely to be acceptable.

2.1.11 **"Good practice" standards** are those put forward by the Mayor as representing general good practice. Their adoption is likely to help lead to the kind of exemplary housing quality and design the Mayor is committed to achieving. Departure from individual standards in this category is in most circumstances unlikely to justify refusal of planning permission (there may be exceptions where the departure is particularly substantial or serious), while failure to meet a number of them is likely to lead to more thorough consideration of the design aspects of a scheme and, should a satisfactory outcome not be achieved, to be resisted by decision-makers. The flexibility inherent in 'good practice' standards underscores the more general need for developers and boroughs to engage at an early stage of the design process to understand how the standards should be applied in the distinct circumstances of individual developments. These include those circumstances which may lead to possible trade-offs between, say, good practice on naturally lit corridors and the baseline need to avoid single aspect dwellings.

2.1.12 In every case, consideration should be given to these standards alongside achievement of other objectives of the LP. In particular, regard should be had on the one hand to 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. The Mayor intends to keep this balance under review and may, as conditions change and familiarity with the standards grow, reassess these categories and the allocation of particular standards between them.

2.1.13 Failure to meet one standard would not necessarily lead to an issue of compliance with the LP, but a combination of failures would cause concern. In most cases, departures from the Baseline 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.

2.1.14 As noted, the standards will apply to all new housing in London including new-build dwellings, conversions and change of use schemes where new dwellings are created. The standards do **not** apply to specialist forms of housing including student housing, sheltered housing and homes in multiple occupation.

2.1.15 When considering application of LP standards in Boroughs which already have their own standards, the LP standards should be used as minima. Application of the standards to Listed Building related development will require particular sensitivity in line with the flexibility outlined in paras 2.1.9 – 2.1.13 above. Application of the standards should be clearly demonstrated in a **design and access statement**, which will be used to assess the acceptability of any proposal.

2.1.16 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 below should be explicit considerations that are clearly outlined in a planning framework, as required by Policy 3.7 *Large Residential Developments* (see Part 2.6 of this SPG).

2.1.17 The standards outlined below integrate key policies in the LP that have a bearing on design issues for new housing including 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 *Building London's Neighbourhoods and Communities*, 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*).

2.1.18 Importantly, the standards also 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, visually or hearing impaired, have learning difficulties or who are wheelchair users. Housing should also support family life, whether in the flexibility and generosity of units for smaller families, or in the provision of larger homes. These concerns are addressed as a policy requirement for Lifetime Homes[92] and for wheelchair housing[93] (Policy 3.8 *Housing Choice*). The Lifetime Homes criteria have been incorporated into the housing design standards[94] and Annex 2 to this SPG summarises the Mayor's best practice guidance on wheelchair accessible housing. The British Standards Institution is currently consulting on a code of practice which addresses many of the objectives of Lifetime Homes[95]. This will be taken into account in further alterations to the London Plan.

2.1.19 The Building for Life design criteria[96] are currently subject to review by the Design Council/CABE. It is anticipated that they will focus on the external residential environment and, where relevant, will be addressed in the forthcoming Shaping Neighbourhoods SPG.

92 For further guidance please refer to: www.lifetimehomes.org.uk .
93 For further detailed guidance please refer to: Habinteg Housing Association. The Wheelchair Housing Design Guide. Habinteg, 2006, http://www.habinteg.org.uk/main.cfm?type=WCHDG. See Annex 2.2 of this SPG for summary.
94 For further detailed advice please refer to Mayor of London LHDG 2010 ibid
95 British Standards Institution. Design of accessible general needs housing – code of practice. Draft for public comment. BSI, 2012
96 For Building for Life criteria please see: www.buildingforlife.org/criteria;
For further information please refer to: http://www.designcouncil.org.uk/our-work/cabe/localism-and-planning/building-for-life/

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. Provision of public, communal and open spaces also makes a key contribution to residents' quality of life, and there is a particular need to take account of the requirements of children, older and disabled people. This resonates strongly with NPPF policy to promote healthy communities[97].

2.2.2 Policy 3.5 is supported in this respect by Policy 7.1 *Building London's Neighbourhoods and Communities*. This policy seeks to implement the principles of Lifetime Neighbourhoods which provide people with the best possible access to services, infrastructure and public transport and possess a character easy to understand and relate to. The policy also requires new development to be designed to improve people's access to social and community infrastructure (including green spaces), the Blue Ribbon Network, local shops and employment opportunities, contribute to people's sense of place, safety and security, and to reinforce or enhance the character, legibility and permeability of the neighbourhood. Further advice and guidance on Lifetime Neighbourhoods will be included in the forthcoming Shaping Neighbourhoods SPG.

97 CLG NPPF 2012 ibid paras 69 - 74

Defining Good Places

BASELINE

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:

a How the scheme complements the local network of public spaces, including how it integrates with existing streets and paths.

b How public spaces and pedestrian routes are designed to be overlooked and safe, and blank elevations onto the public realm at ground floor have been avoided.

c For larger developments, how any new public spaces including streets and paths are designed on the basis of an understanding of the planned role and character of these spaces within the local movement network, and how new spaces relate to the local vision and strategy for the area.

Scheme: Bermondsey Spa, Credit: Jonathan Finch

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 observation of existing assets, and the local authority's existing vision or spatial strategy for the area. Through scale, material, massing and building type, development should respect 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. The Mayor will produce further guidance on implementing policy concerned to respect local character and context. 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 realm[98], 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*). The layout of housing proposals should be designed to ensure integration with surrounding land uses; appropriate levels of permeability; and access to social and green infrastructure, public transport facilities and employment opportunities, so they can contribute to the achievement of Lifetime Neighbourhood Principles for local communities (Policy 7.1 *Building London's Neighbourhoods and Communities*). The LP supports boroughs in resisting forms of development which compromise the Mayor's objective to secure an more socially inclusive city, including 'gated communities[99]'

Outdoor spaces including gardens

BASELINE

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:

98 Mayor of London, CABE. Open Space Strategies – best practice guidance. GLA, 2008 (currently under review)
99 Mayor of London LP 2011 ibid para 3.60

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.

2.2.6 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.

2.2.7 Designers and developers should undertake a review of existing open spaces in the area and take account 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]. Large[100] 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 spaces.

2.2.8 Outdoor space, whether for public use or private communal use should be designed so it can be used safely, without the fear of crime and should be designed to a high standard. The space should be managed appropriately to ensure that it remains useful and welcoming to all its intended users. 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 CABE[101].

2.2.9 Policy 3.5 also 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 polices (see paragraphs 1.2.17 – 24 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.

Play space

BASELINE

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 LP SPG on Providing for Children and Young People's Informal Recreation.

2.2.10 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,

100 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

101 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

well designed, secure and stimulating[102] play and informal recreation provision. Housing development proposals are expected to make appropriate provision based on their expected child population and future needs.

2.2.11 The recently published SPG *Providing for Children and Young People's Play and Informal Recreation* provides guidance on estimating child occupancy and on the levels and types of provision required for different age groups[103]. This draws on national policy, the GLA's own open space hierarchy and the National Playing Fields standards for play provision.

2.2.12 The Play SPG advises boroughs to develop locally agreed methods for calculating child occupancy and recommends a minimum benchmark figure of 10 sq m of dedicated playspace per child for assessing existing and future provision – subject to verification in the local play strategy (see Part 2.5 of this SPG). The SPG also recognises that appropriate and accessible facilities within 400 metres for 5-11 year olds or within 800 metres for 12 plus age groups may be acceptable alternatives, where these are not already over subscribed. 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 toilets.[104]

2.2.13 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

2.2.14 The Mayor is committed to ensuring that neighbourhoods and buildings are designed to minimise opportunities for crime and anti-social behaviour. LP Policy 7.3 *Designing out Crime* requires development proposals to take account of the principles of *Safer Places*[105] and *Secured by Design*[106] . The Mayor's London Housing Strategy also seeks to ensure that the built form should deter criminal opportunism and provide residents with an increased sense of security.

2.2.15 Development proposals should reduce opportunities for criminal behaviour and contribute to a sense of security without being overbearing or intimidating or introducing potential physical or perception barriers to access by disabled people or others. 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.

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

103 Mayor of London. Supplementary Planning Guidance. Providing for Children and Young People's Play and Informal Recreation. GLA, 2012

104 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

105 Office of the Deputy Prime Minister and Home Office. Safer Places: The Planning System and Crime Prevention. ODPM, 2004.

106 Association of Chief Police Officers. Secured by Design. New Homes 2010. ACPO Secured by Design, 2010

POLICY 7.3 DESIGNING OUT CRIME

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 an indication of whether a space is private, semi-public or public with natural surveillance of publicly accessible spaces;

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 well designed to promote a sense of ownership and respect;

e places, buildings and structures should incorporate appropriately designed security features; and

f schemes should be designed with on-going management and future maintenance costs of the particular safety and security measures proposed in mind.

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

I. HOUSING FOR A DIVERSE CITY

Density

BASELINE

Standard 2.1.1 (and Policy 3.4) - 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.

2.2.16 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

BASELINE

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 borough targets and are appropriate to the location in London.

2.2.17 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. See also para 3.2.3 of this SPG (social mix), which underscores the need to resist developments which might compromise objectives to secure a more socially inclusive city eg 'gated communities' (LP 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 (LP para 3.76).

Social Infrastructure

2.2.18 Please see part 6 of this SPG for further information on social infrastructure provision.

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 Lifetime Homes principles, which have been requirements for new housing in London for a number of years, and are therefore provided as Baseline standards.

Entrance and approach

BASELINE

Standard 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[1].

Standard 3.1.2 - The distance from the accessible car parking space of standard 3.3.4

1 Building for Life op cit, Criterion 8

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[2].

Standard 3.1.3 - The approach to all entrances should preferably be level or gently sloping[3].

Standard 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.

2 Lifetime Homes op cit, Criterion 2
3 Lifetime Homes op cit, Criterion 3

Shared Circulation

BASELINE
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. 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[107]

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 - 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[108].

Standard 3.2.6 - All dwellings entered at the fourth floor (fifth storey) and above should be served by at least one lift, and desirable that dwellings entered at the third floor (fourth storey) are served by at least one lift. All dwellings entered at the seventh floor (eighth storey) and above should be served by at least two lifts.

Standard 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.

Standard 3.2.8 - Principal access stairs should provide easy access[109] regardless of whether a lift is provided. Where homes are reached by a lift, it should be fully wheelchair accessible[110].

107 Based on: Secured by Design, ibid

108 Based on: Lifetime Homes guidance op cit
109 In Lifetime Homes (op cit) Criterion 5 a stair providing easy access is defined as one having maximum risers of 170mm, minimum goings of 250mm, handrails extending 300mm beyond the top and bottom,a handrail height 900mm from each nosing, step nosings distinguishable through contrasting brightness, and risers which are not open.
110 Lifetime Homes op cit, Criterion 5

GOOD PRACTICE

Standard 3.2.1 - The number of dwellings accessed from a single core should not exceed eight per floor, subject to dwelling size mix.

Standard 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[1].

1 Lifetime Homes. Code of Practice. BSI, 2007

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

2.3.4 With good design, control of numbers, and careful balancing of dwelling types, all forms of shared circulation can result in successful housing. But the choice should be a measured one. 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.

2.3.5 Important considerations for shared circulation include:

- The number of people sharing a circulation core and landing, which both affect how intensively the space will be used. For example, eight family sized (over two bedrooms) units dwellings per core is normally a maximum, but up to 12 single person units/core may be acceptable;
- Design considerations including width, enclosure, view, light and ventilation of circulation spaces;
- The number and size of lifts; the type of access control and other security measures; and
- Management arrangements for maintenance, cleaning and security.

Car parking

BASELINE

Standard 3.3.1 (and Policy 6.13) - 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 2.3:

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

Standard 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[111].

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 open spaces[112],[113].

Standard 3.3.4 - Where a dwelling has car parking within its plot, at least one parking space should be capable of enlargement to attain 3300mm width. 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[114].

111 Based on the Wheelchair Housing Design Guide Habinteg 2006 op cit
112 For best practice guidance on design standards for wheelchair accessible dwellings please refer to: Annex 2.2 of this SPG
113 Building for Life op cit, Criterion 12
114 Lifetime Homes op cit, Criterion 1

2.3.6 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 NPPF[115] 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. and parking provision for disabled people.

115 CLG NPPF 2011 ibid paras 39 - 40

Cycle storage

BASELINE

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

i. 1 per 1-2 bedroom dwelling; or
ii. 2 per 3+ bedroom dwelling.

GOOD PRACTICE

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 acceptable[116].

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

2.3.7 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. The Mayor has proposed a minor Alteration to the LP to refine current cycle parking standards. Developers and boroughs are also encouraged to make provision, with a charging facility, for mobility scooters.

Refuse facilities

BASELINE

Standard 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.

Standard 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.

2.3.8 LP Policy 5.17 *Waste Capacity* requires the provision of suitable waste and recycling storage facilities in all new developments.

2.3.9 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 and reconciled with the Code for Sustainable Homes technical guidance. The guidance requires storage space for waste within dwellings to be be provided at the following levels:

- 100 litres volume of storage space for non-recyclable waste for a one-bedroom dwelling and a further 70 litres for each additional bedroom[117]
- Where recyclable household waste is sorted after collection, space for at least one 30-litre container per dwelling in a suitable internal space (e.g. within the kitchen); and
- Where recyclable household waste is sorted before collection, space for at least three containers with a total capacity of 30 litres per dwelling in a suitable internal space. There should be space to enable each bin to have a capacity of at least 7 litres[118].

2.3.10 The Code's guidance provides further detail eg on external storage for recyclable and non recyclable waste for both flats and houses. Local authorities may have additional requirements regarding refuse, green waste and recycling.

117 Communities and Local Government. Code for Sustainable Homes Technical Guide. CLG, 2010

118 For more details see Code for Sustainable Homes Technical Guide CLG 2010 ibid

III. DWELLING SPACE STANDARDS

Internal Floor Area
BASELINE

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 LP)

	Dwelling type (bedroom/persons)	Essential GIA (sq.m)
Flats	1p	37
	1b2p	50
	2b3p	61
	2b4p	70
	3b4p	74
	3b5p	86
	3b6p	95
	4b5p	90
	4b6p	99
2 storey houses	2b4p	83
	3b4p	87
	3b5p	96
	4b5p	100
	4b6p	107
3 storey houses	3b5p	102
	4b5p	106
	4b6p	113

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[119] [120].

119 For best practice guidance on design standards for wheelchair accessible dwellings refer to: Annex 2 of this SPG
120 For more detailed advice see Mayor of London LHDG 2010 ibid

2.3.11 LP Policy 3.5 places a significant new 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 fit for purpose and offer the potential to be occupied over time by households of all tenures.

2.3.12 The minimum gross internal floor areas (GIA[121]) required for new homes are defined in relation to the number of occupants, bedrooms and storeys. The minimum GIA incorporate the Lifetime Homes standards and basic furniture and activity spaces requirements derived from the HCA's Housing Quality Indicators. The GIA 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 flats (or other dwellings on one floor) 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, and other rooms including utility rooms and studies, are encouraged, but will require additional floor area above the minimum GIA – in broad terms, an extra 3 sq m for every extra WC/shower and an extra 5 sq m for every extra bathroom.

2.3.13 LP Table 3.3/Standard 4.1.1 does not cover all possible permutations of dwelling type/size. A fuller categorisation is provided in Annex 4 which is also more precise than the London Plan 'rule of thumb' that an additional 10 sq m be provided when assessing the space requirements of homes accommodating more than six bedspaces.

2.3.14 The research carried out for the LHDG[122] found that in size terms several types of homes were at or even below the lower end of potential occupancy ranges. This has been confirmed by more recent analysis carried out by HATC[123] which highlighted smaller dwellings (especially 1 person units and 2 person, 1 bed units) of being below the relevant space standard by a significant margin. Evidence on bedroom occupancy is shown 4.5.1 and 4.5.2 below, see also 3.2 mixed and balanced communities.

2.3.15 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 to themselves when the dwelling is fully occupied."[124]

121 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.

122 Mayor of London LHDG ibid p47
123 London Housing Standards Report,HATC 2012
124 Mayor of London LHDG ibid p47

2.3.16 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. As general benchmarks for assessment purposes, consideration should be given to using at least the 7.5 sq m/single bedroom and the 11.5 sq m/double bedroom areas noted in para 2.3.22. Careful consideration should also be given to the provision of decent sized living rooms (see standard below).

2.3.17 The space standards outlined in the LP 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 practice[125]. 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.

2.3.18 Based on Lifetime Homes requirements and the London Housing Design Guide Space Standards study, 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, and they must clearly embody exemplary design standards.

2.3.19 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.

125 GVA Grimley op cit

Flexibility and adaptability

BASELINE

Standard 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 occupier preferences

2.3.20 In accordance with Policy 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 making individual rooms large enough to accommodate different types and arrangements of furniture, carefully considering the location of doors, windows and built-in furniture, and building in the potential for spaces to be linked or separated without moving walls or changing the position of openings.

2.3.21 It also means offering the potential for internal spaces to be modified with relative ease. Thoughtful design can facilitate adaptation by positioning structural supports to allow new openings in internal walls, or by creating easily demountable partitions which are clear of services.

Circulation in the home

BASELINE

Standard 4.3.1 - 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:

Minimum clear opening width of doorway (mm)	Minimum approach width (when approach is not head on (mm)
750	1200
775	1050
900	900

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:[126]

Standard 4.3.2 - The design of dwellings of more than one storey should incorporate potential for a future stair lift to be installed and a suitably identified space for a through the floor lift from the entrance level to a storey containing a main bedroom and an accessible bathroom[127]

126 Lifetime Homes op cit, Criterion 6
127 Lifetime Homes op cit, Criterion 12

Living rooms, dining rooms, kitchens

BASELINE

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[128].

Standard 4.4.5 - A living area or kitchen dining room should be at entrance level[129].

Standard 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[130].

128 Lifetime Homes op cit, Criterion 7
129 Lifetime Homes op cit, Criterion 8
130 Lifetime Homes op cit, Criterion 15

GOOD PRACTICE

Standard 4.4.1 - The following combined floor areas for living/kitchen/dining space should be met:

Designed level of occupancy	Floor area for living/kitchen/dining (sq.m)
1 person/2 person	23
3 person	25
4 person	27
5 person	29
6 person	31

Standard 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 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.

Bedrooms

BASELINE

Standard 4.5.3 - In homes of two or more storeys with no permanent bedroom at entrance level[131], there should be space on the entrance level that could be used as a convenient temporary bed space[132].

Standard 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[133].

131 In the Lifetime Homes Criteria (op cit) the entrance level of a dwelling is generally deemed to be the storey containing the main entrance door. Where there are no rooms on the storey containing the main entrance door (e.g. flats over garages or shops and some duplexes and townhouses) the first storey level containing a habitable or non-habitable room can be considered the entrance level, if this storey is reached by a stair providing easy access.
132 Lifetime Homes op cit, Criterion 9
133 Lifetime Homes op cit, Criterion 13

GOOD PRACTICE

Standard 4.5.1 - The minimum area of a single bedroom should be 8sqm. The minimum area of a double or twin bedroom should be 12sqm.

Standard 4.5.2 - The minimum width of double and twin bedrooms should be 2.75m in most of the length of the room.

2.3.22 The preferred minimum floor areas of bedrooms are 8 sqm for single bedrooms and 12 sqm for double and twin bedrooms: 7.5 sq m and 11.5 sq are generally regarded as the smallest respective benchmarks[134]. 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. Ideally, 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. With regard to Good Practice standard 4.4.3, private sector dwellings should have the flexibility to respond to market requirements in the internal arrangement of dining and living rooms and kitchens.

134 HCA Housing Quality Indicators ibid

Bathrooms and WCs

BASELINE

Standard 4.6.2 – Where there is no accessible bathroom at entrance level[135], a wheelchair accessible WC with potential for a shower to be installed should be provided at entrance level[136],[137].

Standard 4.6.3 - An accessible bathroom should be provided in every dwelling on the same storey as a main bedroom[138].

Standard 4.6.4 - Walls in the bathrooms and WCs should be capable of taking adaptations such as handrails[139],[140].

135 In the Lifetime Homes Criteria (op cit) the entrance level of a dwelling is generally deemed to be the storey containing the main entrance door. Where there are no rooms on the storey containing the main entrance door (e.g. flats over garages or shops and some duplexes and townhouses) the first storey level containing a habitable or non-habitable room can be considered the entrance level, if this storey is reached by a stair providing easy access.
136 Dwellings over more than one storey with no more than two bedrooms may instead be designed with a Part M compliant WC at entrance level. A floor drain should be provided to allow for an accessible shower to be installed at a later date
137 Lifetime Homes op cit, Criterion 10
138 Lifetime Homes o cit, Criterion 14
139 Adequate fixing and support for grab rails should be available at any location on all walls within a height band of 300mm - 1800mm from the floor.
140 Lifetime Homes op cit, Criterion 11

GOOD PRACTICE

Standard 4.6.1 - Dwellings designed for a potential occupancy of 5 persons or more should provide a minimum of one bathroom with WC and one additional WC.

Storage and utility space

BASELINE

Standard 4.7.1 – In dwellings 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[141].

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.

141 Based on: HCA Housing Quality Indicators ibid

Study and work

BASELINE

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[142].

Standard 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[143].

142 Recommended reference on working from home: Code for Sustainable Homes Technical Guide CLG 2010 op cit
143 Lifetime Homes op cit, Criterion 16

2.3.23 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.

Wheelchair accessible dwellings

BASELINE

Standard 4.9.1 (and Policy 3.8) - 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.

2.3.24 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 accessible, or easily adaptable for residents who are wheelchair users. The GLA's Best Practice Guidance on Wheelchair Accessible Housing[144], based on the Habinteg's Wheelchair Housing Design Guide[145], is summarised in Annex 2.

144 Mayor of London. Best Practice Guidance: Wheelchair Accessible Housing. GLA, 2007
145 Habinteg 2006 op cit

Private open space

BASELINE

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[146].

Standard 4.10.2 - All private outdoor space should have level access from the home[147], [148].

Standard 4.10.3 - The minimum depth and width for all balconies and other private external spaces should be 1500mm[149].

146 Based on: furniture and activity requirements of the HCA HQI ibid and Lifetime Homes criteria op cit
147 Balconies and terraces over habitable rooms which require a step up to increase slab thickness / insulation are exempt from the Lifetime Homes level access standard.
148 Based on Lifetime Homes op cit, Criterion 4
149 Based on the furniture and activity requirements of the HCA HQI ibid and Lifetime Homes criteria op cit

2.3.25 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.

2.3.26 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 will be considered acceptable alternative to open balconies for all flats and this solution is recommended for all dwellings exposed to NEC noise category C or D[150]. 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.

2.3.27 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

2.3.28 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 are sometimes hostile to the quiet enjoyment we want from our homes.

2.3.29 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

150 Communities and Local Government. Planning Policy Guidance 24 (PPG 24): Planning & Noise CLG, 1994
See also CLG NPPF 2012 ibid para 123
DEFRA. Noise Policy Statement for England. Explanatory Note. DEFRA, 2010

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

BASELINE

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 [151].

151 Based on: Secured by Design op cit

2.3.30 Design and access statements should demonstrate how the design as a whole uses a variety of measures to provide adequate visual and acoustic privacy for every home in a development. Designers should consider the position and aspect of habitable rooms, gardens and balconies, and avoid windows facing each other where privacy distances are tight. In the past, planning guidance for privacy has been concerned with achieving visual separation between dwellings by setting a minimum distance of 18 – 21m between facing homes (between habitable room and habitable room as opposed to between balconies or terraces or between habitable rooms and balconies/terraces). These can still be useful yardsticks for visual privacy, but adhering rigidly to these measures can limit the variety of urban spaces and housing types in the city, and can sometimes unnecessarily restrict density[152]. 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.

152 Maccreanor Lavington Architects, Emily Greeves Architects, Graham Harrington. Housing Density Study. GLA, 2012

Dual aspect

BASELINE

Standard 5.2.1 - Developments should avoid single aspect dwellings that are north facing, exposed to noise levels above which significant adverse effects on health and quality of life occur, or contain three or more bedrooms[153].

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

2.3.31 A home with opening windows on at least two sides has many inherent benefits, including better daylight, a greater chance of direct sunlight for longer periods, natural cross ventilation, 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. A dual aspect dwelling is defined as one with openable windows on two external walls, which may be opposite or adjacent around a corner. 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.

2.3.32 Single aspect dwellings are more difficult to ventilate naturally and more likely to overheat (see Standard 6.3.1 and Policy 3.9). 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.

2.3.33 Where limited numbers of rooms are required, the frontage is generous, the plan is shallow, and the orientation is favourable, good single aspect one and two bedroom homes are possible. 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

BASELINE

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.

2.3.34 Policy 7.15 *Reducing Noise and Enhancing Soundscapes* requires development proposals to seek to reduce noise and manage the effects of noise. 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 NPPF[154].

2.3.35 All dwellings should be built with acoustic insulation and tested to current Building Regulations standards[155]. 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.

154 CLG NPPF 2012 ibid para 123

155 For further guidance please refer to: BRE Acoustics. Improving Sound Insulation in Homes, http://www.bre.co.uk/pdf/sound-ins_homes.pdf

Floor to ceiling heights

BASELINE

Standard 5.4.1 - The minimum floor to ceiling height in habitable rooms should be 2.5m between finished floor level and finished ceiling level.

2.3.36 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. In habitable rooms, ceiling heights will be expected to be at least 2.5m. A minimum floor to ceiling height of 2.6m is considered desirable in habitable rooms and taller ceiling heights are encouraged in ground floor dwellings. Rooms with sloping or stepped ceilings should achieve the minimum ceiling heights in at least 60% 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) and in mezzanine typologies, and that they may be appropriate in bedrooms in houses.

2.3.37 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

GOOD PRACTICE

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.

2.3.38 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).

2.3.39 The Code for Sustainable Homes requires a minimum average daylight factor of 2% in kitchens and 1.5% in living rooms, dining rooms and bedrooms in order to achieve credits. These measures define a minimum acceptable level to make an interior feel day-lit, but they do not guarantee a comfortable level of light for a range of daily activities. Good practice standards 5.5.1 and 5.5.2 seek to achieve that higher level of comfort.

Air quality

BASELINE

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).

2.3.40 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'. Developers should focus on reducing nitrogen oxides (NO_x) and particulates (PM_{10}) from their schemes. During the demolition and construction phase emissions primarily come from the operation of construction vehicles and plant and the generation of dust[156]. 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 will be provided in a revision to the Sustainable Design & Construction SPG.

2.3.41 Where schemes cannot have openable windows due to poor air quality, 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.

156 See Mayor of London. Control of Dust & Emissions from Construction & Demolition. Draft Supplementary Planning Guidance. Forthcoming

V. CLIMATE CHANGE MITIGATION AND ADAPTATION

2.3.42 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

BASELINE

Standard 6.1.2 (and Policy 5.3) - 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.

GOOD PRACTICE

Standard 6.1.1 - Designers should seek to achieve a minimum of Level 4 of the Code for Sustainable Homes in all new developments.

2.3.43 The Government has established the Code for Sustainable Homes (CSH) as a national standard for the sustainable design and construction of new homes. The Mayor's approach[157] outlined in the Plan is compatible with this, and it is expected that new housing development in London will seek to achieve the highest code levels possible. The London Housing Strategy states that CSH level 4 will be required in order to comply with Government (HCA) funding requirements from 2011. Dwellings resulting from change of use or conversion should aim to achieve similar standards as far as possible.

157 Mayor of London. Sustainable Design & Construction Supplementary Planning Guidance. Currently under review.

Energy and CO_2

BASELINE

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 2010 Building Regulations
2010 - 2013	25 per cent
2013 - 2016	40 per cent
2016 - 2031	Zero carbon

2.3.44 The LP provides an explicit policy requirement to minimise carbon dioxide emission in Policy 5.2 *Minimising Carbon Dioxide Emissions*. This policy sets targets for development proposals above the target emission rate in national Building Regulations (Part L, 2010), leading towards the Government's zero carbon ambition from 2016.

2.3.45 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

2.3.46 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. 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, and active design measures such as high efficiency lighting and efficient mechanical ventilation that recovers heat from outgoing stale air to pre-heat fresh incoming air. As a minimum, 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.

2.3.47 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 (typically fed by combined heat and power systems), and where possible to connect to an existing district heating networks. In respect to the latter requirement, density is an important consideration as a minimum average density of 50 homes per hectare is recommended in order to limit the cost of pipe installation[158]. 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.

2.3.48 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: biomass for heating, cooling and electricity; 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. Where a biomass boiler is proposed, developers are also required to provide a detailed air quality assessment in accordance with Policy 7.14 *Improving Air Quality*.

2.3.49 In major developments, these design requirements should be demonstrated, as appropriate, in an Energy Assessment. Further guidance on how to complete an Energy Assessment can be found on the GLA Planning Decisions website[159].

Overheating

BASELINE

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

2.3.50 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 due to climate change and London's urban heat island effect, mean dwellings could be increasingly at risk of overheating[160]. New housing needs to be designed for the climate it will experience over its life.

2.3.51 Standard 5.2.1 above seeks to promote the development of dual aspect dwellings and Standard 5.4.1 above seeks to promote minimum floor to ceiling heights to assist with natural ventilation. Policy 5.9 *Overheating and Cooling* provides

158 See CABE and Urban Practitioners. CABE Sustainable Places. Establishing local networks for energy supply / combined heat and power. http://webarchive.nationalarchives.gov.uk/20110118095356/http:/www.cabe.org.uk/sustainable-places/advice/local-energy-and-combined-heat-and-power

159 Greater London Authority. Energy Planning - GLA Guidance on preparing energy assessments. GLA, 2011

160 CIBSE Part A recommends maximum standards for overheating in its Guide A. Environmental Design. 2006. currently subject to review

further policy requirements to prevent overheating. This policy outlines a cooling hierarchy which recommends firstly minimising internal heat generation, secondly increasing albedo (surface reflectivity to solar radiation) and using shading devices to prevent excessive solar gain in the summertime, and thirdly, promoting natural ventilation. Where community heating is provided, hot water pipes should be well insulated and consideration be given to the location and ventilation of heating equipment to minimise the transfer of heat into a development which could result in overheating.

2.3.52 In addition, Policy 5.10 *Urban Greening* and Policy 5.11 *Green Roofs and Development Site Environs*, seek to promote the use of planting, including green walls and soft landscaping to reduce the degree of heating of the urban environment. Recommended measures include planting deciduous trees to reduce solar gain during the summer 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

BASELINE

Standard 6.4.1 (and Policy 5.15) - New dwellings should be designed to ensure that a maximum of 105 litres of water is consumed per person per day.

2.3.53 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.

2.3.54 To achieve Code Level 4, a maximum water consumption of 105 litres per person per day is required. Policy 5.15 *Water Use and Supplies* reiterates this target as a requirement for all development in London and states the Mayor will also investigate a 'fittings based' approach to achieving this target - one which controls water usage through flow rates e.g. taps, rather than amounts related to installations e.g. bath size.

Flooding and drainage

BASELINE

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 PPS25.

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.

2.3.55 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 details[161].

2.3.56 Policy 5.13 *Sustainable Drainage* requires development proposals to utilise sustainable urban drainage systems (SUDS) to manage surface water runoff[162]. A drainage hierarchy is provided to help achieve a reduction in the overall amount of rainfall discharged into the drainage system. A key aim of this policy is to encourage management of as much run-off as possible on-site and explore sustainable methods for managing the remainder as close as possible to the site. Carefully designed green roofs and other SUDS techniques such as permeable pavements and porous surfaces can make a valuable contribution to sustainable drainage with the aim of achieving a 'greenfield' run off rate[163] (see Policy 5.11 *Green Roofs and Development Site Environs*).

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

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

163 See also para 1.2.25 regarding subterranean development and hydrology

Materials

BASELINE

Standard 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.

GOOD PRACTICE

Standard 6.5.1 - All new residential development should accord with Code Level 4 and the Mayor's Sustainable Design and Construction SPG with regard to the sourcing of materials,

2.3.57 The environmental impact of building materials is a specific consideration in Plan Policy 5.3 *Sustainable Design and Construction*. In accordance with this policy, the use of materials should be based upon the following principles:

- Reuse existing materials, where possible
- Procure and use materials sustainably;
- Select materials with low lifecycle impacts; and
- Optimise use of local materials.

2.3.58 Baseline standard 6.5.2 refers to Policy 3.5 and Code for Sustainable Homes mandatory standard Mat2, which requires at least three of the following five elements of the building envelope to achieve a rating of A+ to D in *The Green Guide of Specification*: roof, external walls, internal walls (including separating walls), upper and ground floors (including separating floors), windows.

2.3.59 Good practice standard 6.5.1 refers to

Code for Sustainable Homes standard Mat1 which requires that at least 80% of assessed building elements are responsibly sourced and 100% of timber elements are legally sourced, in order to achieve credits.

Ecology

BASELINE

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.

2.3.60 Policy 7.19 *Biodiversity and Access to Nature* promotes a proactive approach to the protection, promotion and management of biodiversity across the capital[164]. 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.

2.3.61 The Code for Sustainable Homes seeks to protect existing ecological features from damage during construction and promotes the most efficient use of a building's footprint by ensuring that land and materials are optimised across the development.

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 additional design standards for wheelchair user dwellings; and.
- consider the London Housing Design Guide section 7 for best practice guidance on meeting the 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 archived section of the former CABE website[165]. 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:

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

165 CABE. Writing a design and access statement. http://www.cabe.org.uk/planning/design-and-access/applicants

- drawings of the proposal in context with accompanying analysis of local character and how the proposals should relate to / respect this;
- context plan showing travel distances, walk routes and local facilities;
- table(s) giving the scheme profile: summary information on site area, density, local PTAL level, the number of new homes, the number of wheelchair accessible homes;
- table(s) giving the scheme dwelling mix: the number of dwellings of each housing type (bedrooms/occupancy) belonging to each tenure;
- table(s) giving gross internal areas for each dwelling, by housing type and number of storeys;
- 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 zones[166], Lifetime Homes requirements for circulation and access, and spaces allocated for a washing machine, for drying clothes, and for storing waste and recycling bins within the home (see section 4.7 above);
- the intended occupancy; and
- the GIA.

Information on the following two points relate to good practice standards and could be requested in that light:

- the area of built-in storage free of services and appliances and the area of tall storage (over 2m high); and free of hot water cylinders and other services; and
- the area and dimensions of private outdoor space.

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

2.5 CHILDREN'S PLAY

2.5.1 As part of his commitment to plan for the whole of London, the Mayor is especially concerned to ensure that children and young people have adequate provision for play. The LP seeks to 'ensure that all children have safe access to good quality, well- designed, secure and stimulating play and informal recreation provision' (Policy 3.6). Informed by audits of provision and assessments of need, boroughs are required to produce play and informal recreation strategies to ensure adequate access to facilities and to test the benchmark standards set out in SPG[167] specifically on this issue. Housing developments are expected to make appropriate provision based on their expected child population and future needs.

POLICY 3.6 CHILDREN AND YOUNG PEOPLE'S PLAY AND INFORMAL RECREATION FACILITIES

Strategic

A The Mayor and appropriate organisations should ensure that all children and young people have safe access to good quality, well-designed, secure and stimulating play and informal recreation provision, incorporating trees and greenery wherever possible.

167 Mayor of London. Supplementary Planning Guidance. Providing for Children and Young People's Play and Informal Recreation. GLA, 2012

Planning decisions

B Development proposals that include housing should make provision for play and informal recreation, based on the expected child population generated by the scheme and an assessment of future needs. The Mayor's Supplementary Planning Guidance *Providing for Children and Young People's Play and Informal Recreation* sets out guidance to assist in this process.

LDF preparation

C Boroughs should:

a undertake audits of existing play and informal recreation provision and assessments of need in their areas, considering the qualitative, quantitative and accessibility elements of play and informal recreation facilities

b produce strategies on play and informal recreation supported by LDF policies to improve access, safety and opportunity for all children and young people in their area.

2.5.2 The Play SPG provides guidance on delivering a child and young person friendly environment through the GLA's own open space hierarchy and the LP's open space categorisation (Policy 7.18). It includes an outline of the most effective process to be taken in the application of standards so they result in provision which is responsive to local circumstances and needs. Whilst the Mayor will expect provision to be made on site, off-site provision (including the creation of new provision, improvement to existing play facilities and any necessary access improvements) may be acceptable. There may also be scope for innovative solutions outside these guidelines if they meet the criteria for quantity, quality and access.

2.6 LARGE RESIDENTIAL DEVELOPMENTS

2.6.1 Though the SHLAA shows that small sites will make an important contribution to meeting future housing needs, London is particularly dependent on that of larger sites. The contribution of Opportunity and Intensification Areas alone (almost 260,000 dwellings, mostly on the largest brown field sites) could potentially approximate to at least 77% of currently identified provision, and experience shows that with careful local planning, output from them is almost always higher than initially expected. Policy 3.7 recognises this and requires Boroughs to work with partners through an 'appropriately plan led' process to realise this potential on sites of more than 5 ha or capable of accommodating more than 500 dwellings. This approach also resonates with government guidance[168].

2.6.2 They also provide opportunities to create particularly attractive neighbourhoods with distinctive identities and the critical mass to support social, physical and environmental infrastructure and provide employment opportunities. For these new neighbourhoods to be successful, it is essential that they become places where people choose to live and work. A co-ordinated approach to their development is essential.

168 CLG NPPF 2012 ibid para 52

POLICY 3.7 LARGE RESIDENTIAL DEVELOPMENTS

Strategic, planning decisions and LDF preparation

A Proposals for large residential developments including complementary non-residential uses are encouraged in areas of high public transport accessibility.

B Those on sites of over five hectares or capable of accommodating more than 500 dwellings should be progressed through an appropriately plan-led process to coordinate where necessary provision of social, environmental and other infrastructure and create neighbourhoods with a distinctive character, sense of local pride and civic identity in line with Chapter 7. The planning of these areas should take place with the engagement of local communities and other stakeholders.

2.6.3 Because of the importance of these sites, the Plan already provides considerable guidance on implementation of this policy.

2.6.4 Plans for these areas, which may include strategic framework documents such as SPG, site specific DPD policies and proposals for borough level SPDs as appropriate should take particular account of:

- the relationships between the pattern and scale of development and movement within the site, with adjacent areas, and connections with the wider transport network. The highest development densities and most varied mixes of uses should be located where there is the highest public transport accessibility. Planning from the outset for desire line based permeability for pedestrians and cyclists and minimising car dependence and modal conflict will be particularly important
- other linkages with neighbouring areas so that the new development is designed to be firmly embedded within the wider community. This will require close coordination with service providers as well as existing community organisations
- social infrastructure provision (see Policies 3.16–3.19) with particular attention being paid to access to health, education and other essential services, appropriately phased and coordinated with provision in neighbouring areas so that the development is attractive from the outset as well as being fully sustainable when completed, and takes account of Lifetime Neighbourhood criteria, inclusive design and designing out crime principles (Policies 7.1 – 7.3)
- the opportunities large scale development provide for decentralised energy generation and provision, sustainable design and construction and coordinated neighbourhood management, especially in securing and maintaining a high quality public realm, safety measures, planting and open space and play provision.

Scheme: Queen Marys Place, Roehampton, Credit: St James Scheme

PART 3

HOUSING CHOICE

3.0.1 The Minister in his foreword to the National Planning Policy Framework (NPPF) sets a national objective which resonates particularly with the circumstances of London: "we must house a rising population, which is living longer and wants to make new choices", and the Framework goes on to provide the flexibility[169] to address this objective in light of the capital's distinct needs. This part of the SPG focuses on the spectrum of issues arising from this objective, providing guidance on how the London Plan should be implemented to address the 'social role' of sustainable development[170] and the need to meet the "full objectively assessed needs for market and affordable housing in the housing market area as far as is consistent with the policies set out " in the NPPF[171].

3.0.2 In particular, this part of the SPG is concerned to provide guidance on implementing LP policies to "deliver a wide choice of quality homes, widen opportunities for home ownership and create sustainable, inclusive mixed communities," (planning for) "a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes)"and identifying "the size, type, tenure and range of housing that is required[172]"

3.0.3 Policies 3.8 and 3.9 of the Plan make clear that the Mayor is committed to promoting a real choice of homes for Londoners. 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.

3.0.4 The London Housing Strategy[173] and London Plan (LP) complement each other in taking forward the Mayor's objectives to secure wider housing choice. The Strategy sets out investment intentions for 2011 to 2015 and explains how the Mayor intends to work with voluntary, private and public sector partners to enhance choice, not least in his role as chairman of the London Board Housing. 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 3.10) and, more generally ensuring that housing plays its full, pivotal role in improving the quality of life of all Londoners (Objective 1).

169 CLG. National Planning Policy Framework (NPPF). CLG, 2012 para 10
170 CLG. NPPF 2012 ibid para 7
171 CLG NPPF 2012 ibid para 47
172 CLG NPPF 2012 ibid para 50. See also para 159

173 Mayor of London. Revised London Housing Strategy (LHS). GLA, 2011, for consultation with the public.

POLICY 3.8 – HOUSING CHOICE 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 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, including the private rental sector, in meeting these

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' standards

d ten per cent of new housing 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 coordinated 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 agencies and without compromising capacity for conventional homes.

i The accommodation requirements of gypsies and travellers (including travelling showpeople) are identified and addressed in line with national policy, in coordination with neighbouring boroughs and districts as appropriate.

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, 3.8A, 3.8A a) 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 LP (3.8B) underscores this broadly based approach to identifying need by making clear that boroughs must also take account of strategic as well as local need when framing these policies. Part 4 of this SPG highlights how Affordable Rented housing, with its wide range of rents, is particularly effective in addressing a significant part of the spectrum of need identified through the required, broadly based approach to needs assessment.

3.1.2 The 2008 London Strategic Housing Market Assessment (SHMA)[174] provides a key part of the evidence base for both the LP and London Housing Strategy, as well as the strategic context for sub-regional housing market assessments carried out by boroughs. The 2008 study took the same basic approach as that in 2004[175], but a number of methodological improvements were made which mean that the information it contains is both more up-to-date and a more accurate representation of London's housing requirements between 2007 and 2017. It takes account of both current unmet demand and projected household growth.

3.1.3 A Joint Statement by government, the GLA and London Councils outlined how strategic housing and more local market assessments should address the unique circumstances of the London housing market and the capital's two tier planning system while satisfying still current government requirements and those of Policy 3.8 above. The Statement confirmed that 'the London region represents an appropriate spatial level of analysis for understanding housing markets as well as enabling a coordinated approach to evidence based work and policy making across the region'.

3.1.4 Ideally, an integrated London SHMA robust down to borough level would be the best way for both the GLA and individual boroughs to provide assessments which take into account the strategic and local dimensions to the London housing market, but this would be a lengthy, costly and complex undertaking. In the absence of such a study the Statement supported a 'twin track' approach under which the London-wide SHMA provides the strategic context for boroughs to work together to carry out sub-regional housing market assessments into which more local assessments should fit. This arrangement 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.

174 Mayor of London. London Strategic Housing Market Assessment (SHMA). GLA, 2008
175 Mayor of London. Greater London Housing Requirements Study. GLA, December 2004

3.1.5 The results of the main SHMA scenario are set out in the table below, showing the ten-year net requirements across London by tenure and size. It is stressed that this table illustrates only **pan** London requirements - while it can provide context for LDF preparation and consideration of individual development proposals its use in these circumstances must be complemented by sub regional and local needs assessments.

Table 3.1 10 year pan London net housing requirements (main SHMA scenario)

	Housing tenure			All tenures
Size (bed)	**Market**	**Intermediate**	**Social**	
1	56,500	-	-	56,400
2	67,800	5,300	88,400	161,500
3 +	19,400	31,300	57,200	107,800
Total	**143,600**	**36,500**	**145,600**	**325,800**

3.1.6 These figures show only London-wide requirements for housing – in proportional terms their composition will vary between local areas. These be will identified through sub-regional and local SHMA and be addressed in local plans. It should also be noted that the market analysis in the London SHMA is based on assessment of household requirements and affordability and does not reflect propensities for higher earning households being able to afford housing with more bedrooms than their actual household requirements.

3.1.7 Thus, the SHMA provides only a strategic over-view of the diversity and complexity of London's housing requirements, including the particular need for affordable family homes, a projected increase in small households and a need for more specialist accommodation to meet the requirements of groups such as London's growing numbers of older people and students. Policy to address these needs is informed by other, more specialist evidence – 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 provision[176] and the availability of funding for affordable housing[177]. For example, 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.

3.1.8 The requirements for each tenure and size of housing identified in the SHMA cannot be interpreted in isolation from one another. For example, the zero net

176 CLG NPPF 2012 ibid para 173
177 Mayor of London LHS 2011 ibid

requirement for three bedroom homes only applies if the requirement for four bedroom homes (and for two bedroom homes, and so on) is met in full. If the requirement for the largest homes is not met in full then there is likely to be some continuing requirement for three bedroom homes.

3.1.9 Paragraph 3.45 of the Plan anticipated that SPG might provide benchmarks to inform coordination of affordable housing provision. However, the planning and investment regimes for affordable housing have now changed and some of the sub regional needs assessments which would have contributed to the benchmarks are still in the process of preparation. It is therefore not appropriate at this stage to publish such benchmarks.

3.1.10 In light of government guidance[178] and the SHMA, the LP 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

3.1.11 In assessing specialist housing needs boroughs are strongly advised to take into account new national guidance for development plans to identify and address the needs of service families and for self build housing[179]. Because the NPPF post dated the London Plan these needs are not covered by it.

Planning and private renting

3.1.12 In 2010/11 around 800,000 households were in private rented accommodation, 25% of all households in London compared with 17% in England. The London proportion is projected to increase to 37% by 2025[180].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.

3.1.13 Government[181] and the Mayor support provision of more private rented homes (Policy 3.8B a). Many of the measures to encourage this are outside the concerns of traditional town planning, but should be supported by more broadly based spatial planning policies, whether these be in LDFs or through more specific, local housing and other related strategies. They include:

- support for long term institutional investment, with boroughs working with the GLA and delivery partners
- support for institutional investment in public land including that owned by the GLA

178 CLG. Strategic Housing Market Assessments (SHMA). Practice Guidance Version 2. CLG 2007
CLG NPPF 2012 ibid paras 50, 159 in addition refer to the needs of service families and people wishing to build their own homes which are noted in this SPG para 3.1.11

179 CLG NPPF 2012 ibid paras 50, 159
HM Government. Laying the Foundations. A Housing Strategy for England. CLG,2011
CLG. Custom Build Homes Fund Prospectus. CLG, 2012-10-01 Mayor of London. Build Your Own Home the London Way. Supporting Custom Build Housing and the Community Right to Build. Funding Prospectus. GLA, 2012
CLG. Armed Forces Personnel Housing. CLG, 2011
CLG. Housing Priority for Service Personnel – Measures. CLG, 2011
CLG. Allocation of Accommodation. Guidance for Local Housing Authorities. CLG, 2012
180 Mayor of London. Improving London's Private Rented Housing. GLA, forthcoming,
181 HM Government. Laying the Foundations: A Housing Strategy for England (Housing Strategy). Chapter 4. CLG, 2011
DCLG. Review of the barriers to institutional investment in private rented homes. DCLG, 2012

- maximising the potential of reforms to Real Estate Investment Trusts to attract investment.

3.1.14 As well as these institutional measures, positive support should be given for private renting through the land use planning system at local as well as strategic level eg recognising how the private rented sector can address distinct needs in Local Plans , as well as through development management, especially by recognising the distinct economics of the sector relative to mainstream market housing when undertaking viability assessments.

3.1.15 Proposals for the new London Housing Strategy[182] will complement these measures to increase provision with others to enhance management (including relations with neighbours) and make it more attractive to tenants including:

- encouraging landlord accreditation and tenancies being offered for a longer period than the statutory minimum when the homelessness duty is discharged into the private rented sector:
- working with landlords, agents, boroughs and others to improve more generally the PRS offer in London. This includes introducing a London Rental Standard to increase the number of accredited landlords and agents. The Mayor will consult on this proposal and others in autumn 2012:
- promoting the Mayor's London Rents map to better inform tenant choice: and
- working with government to monitor Housing Benefit reforms.

3.1.16 There are 19,000 registered dwellings in houses in multiple occupation in London and an estimated 150,000 in total[183]. 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.

3.1.17 The LP (paragraph 3.55) is clear that "where they are of reasonable standard they should generally be protected and the net effects of any loss should be reflected in Annual Monitoring Reports. In considering proposals which might constrain this provision, including Article 4 Directions[184] affecting changes between Use Classes C3 and C4, boroughs should take into account the strategic as well as the local importance of houses in multiple occupation". This may require striking a careful balance between local concerns, such as those to protect large houses for local family occupation, recognising that in London as whole there is a surplus of such large dwellings, and the contribution they can make to meeting strategic and local needs if converted to HMOs.

182 Mayor of London, The Revised London Housing Strategy 2011 ibid, for consultation with the public

183 Communities and Local Government. Housing Strategy Statistical Appendix. Data returns for 2008/09. CLG, 2009

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

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

Priority for affordable family accommodation

3.1.19 There is a particular challenge in meeting the housing requirements of families for affordable accommodation, both social 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 seeks to halve over-crowding in social rented housing by 2016, and for the longer term wants half of affordable housing to be for families. His overall approach is set out in the London Over-crowding Action Plan.

3.1.20 However, both the 2004 Housing Requirements Study and the 2008 Strategic Housing Market Assessment found little or no net requirement at the London-wide level for larger market homes (more than 3 bedrooms). This is mainly because much of London's existing private stock is family sized – almost 60 per cent of privately owned and rented dwellings have three bedrooms or more, compared to just 30 per cent in the social rented sector. The high proportion of smaller properties in new supply has a very small effect on London's overall market housing mix because newly built homes typically account for less than five per cent of sales in London. There are however, bound to be local variations in housing requirements, so that in some areas there may be a requirement for new family sized market housing. Similarly, it cannot be assumed that there is no need for 1-bedroom affordable housing in all areas of London simply because there is no net requirement identified at the London level. The desired mix of provision in each area should also be informed by evidence from sub-regional housing market assessments and by the priorities set out in local policy.

3.1.21 Conversely, it must be emphasised that local housing requirements should not be the single determinant of housing mix sought on individual developments, including provision of affordable family housing. LP Policies 3.8, 3.11 and 3.12 expect boroughs to have regard to housing needs beyond their own boundaries when setting their affordable housing policies.

3.1.22 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. Affordable Rented housing is particularly well suited to achieving such a mix.

3.1.23 When assessing available resources and viability (Policy 3.11C f and Policy 3.12 B) account may have to be taken of the different business models of over 60 registered providers contracted with the

HCA/GLA to provide affordable rent products. This will mean recognising that while these models may include a 'percentage of market rent' figure this is an average **investment** outcome across the providers' portfolios as a whole over four years – it is not a fixed target for **planning** purposes on individual sites, so there should be flexibility to negotiate around this figure according to site circumstances, local and strategic need and the other factors highlighted in Policies 3.11 and 3.12. A minor alteration to the London Plan is in preparation which will give greater clarity and policy weight to support boroughs in addressing this issue.

Disabled Londoners

3.1.24 Many Londoners require accessible housing to lead independent and dignified lives. 30,000 Londoners have an unmet need for wheelchair accessible housing, more than 100,000 need redesigned bathing facilities [185] 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 housing[186]. To address the shortage of accessible housing in London all new housing should be built to Lifetime Home standards and at least 10% should be wheelchair accessible or easily adaptable for occupation by a wheelchair user. Guidance on implementing Policy 3.8B c (Lifetime Homes) and Policy 3.8B d (wheelchair accessible housing) is given in paragraph 2.1.18 of this SPG, in the housing design standards of Part 2 and in Annex 2, and on Policy 3.8B e in paragraphs 3.1.25-3.1.49 below (older Londoners).

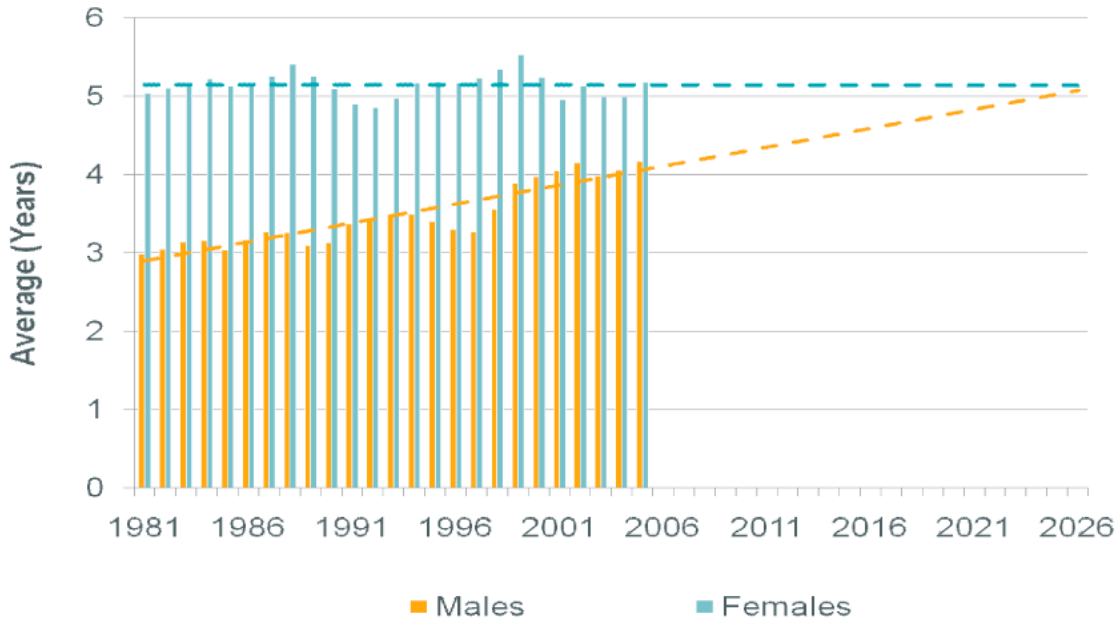
Older Londoners

3.1.25 While London is a 'young' city, it is still expected to experience substantial growth in the population of older people[187] – this has already begun to emerge as an issue in some boroughs, especially in Outer London[188]. The LP anticipated that between 2011 and 2031 the over 65s as a whole would increase by 31 per cent, or 269,000, to reach 1.14 million by 2031. The over 90s were expected to increase by 50 per cent to 71,000[189]. More recent projections, taking into account the reduction in older peoples' propensities to move abroad, now suggest that over 65s could increase by 39% (by 351,000 to reach 1.27 mll by 2031and the over 90s could increase by 150% (to 140,000)[190]. 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 table 3.1).

185 Mayor of London. London Housing Strategy. GLA, February 2010
186 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

187 HM Government. Housing Strategy 2011 op cit paras 6.25 - 38
188 Outer London Commission. Final Report. GLA, 2010
189 Mayor of London. Strategies' Joint Evidence Base. GLA, 2009
190 GLA DMAG. 2010 round borough projections. GLA, 2011

Table 3.1 – Further life expectancy beyond healthy years



- 21% of over 65s have mobility impairments and this rises to 50% of females and 35% of males over 85[191].
- 6% of over 75s have a registerable eye condition[192]
- 23% of over 85s have dementia[193].
- 51% of males and 74% of females over 85 are unable to manage at least one self-care activity[194].

3.1.26 These trends are part of what is likely to be a long term, structural change in London society. Subject to viability assessments and other tests (see para 3.1.35), the LP (Policy 3.8B e) now provides the basis for the planning system to contribute to wider initiatives addressing this change[195], recognising it is likely to become of greater importance over time and a continuing concern for future Plan reviews. In doing so it is carrying forward core principles in the NPPF to foster sustainable development for the city as a whole, as well as addressing the needs of a group specifically identified by the Framework

Types of provision

3.1.27 This requires recognition of the range of housing options required to meet the housing needs and aspirations of older Londoners, including the support necessary to enable them to live independently. Drawing on an independent review[196] of

191 Projecting Older People Information System (POPPI) based on: National Statistics. Living in Britain. General Household Survey 2001, table 29
192 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
193 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
194 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

195 Mayor of London LHS 2011 op cit
196 Cambridge et al 2012 ibid para 7.4

the way in which the planning system can best do this, the typology below suggests, as a starting point, how provision to meet these complex needs can be categorised. This review highlights the need for many boroughs to take a particularly pro-active approach to increase provision of C3 'sheltered' and 'extra care' accommodation, especially in the private sector (see paras 3.1.25, 32 below)

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)
- Extra care accommodation (also called close care, assisted living, very sheltered or continuing care housing)

Use class C2 – Residential institutions

- Residential / nursing care

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*

3.1.28 To differing degrees these types of provision are affected by the range of issues set out below. The way in which they are addressed will vary across London and also within individual boroughs. Drawing on this guidance, it is for LDFs to determine how the broad policies of the LP can be implemented most effectively in light of local circumstances.

3.1.29 In doing this boroughs may wish to draw on the range of estimated needs for the broad C2 and C3 categories of provision suggested by consultants (see Annex 5, 6). These indicate that at present, across London as a whole, most specialist housing for older Londoners is in the social rented sector whereas most of the future requirement is likely to come from people who are currently owner occupiers. Across the capital, provision of new specialist housing has been uneven and has only averaged 1,200 units pa. 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 the modest demand for shared ownership from older households is not being met. Over the period 2011- 2021 London may require 2,000 – 2,350 new specialist units a year, broadly broken down into 1,500 private units, 500 for shared ownership and up to 350 new affordable units. 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 pa in care homes.

Mainstream housing and older people

3.1.30 For the majority of older people, remaining in their own home is their preferred choice

of housing[197]. Some of these households will have made changes to their homes earlier in life because they were already experiencing difficulties or because it was a means of preparing for possible future needs. Those that have not, for financial or other reasons, need to ensure they can remain in their homes for as long as they wish, or unless their health and well being dictates otherwise.[198]

3.1.31 As spatial rather than traditional land use plans, LDFs can draw on LP 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 providers.[199]

3.1.32 In circumstances where older people 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[200], freeing up capacity for families. For example, in 2006/7 only 42% of wheelchair users moving into a housing association home were allocated a wheelchair accessible property, while 70% of lettings of wheelchair accessible homes were to households with no wheelchair user. The London Accessible Housing Register[201] will give social landlords the tools to address this by providing standard categories of accessibility for all home advertised through an improved version of the Choice Based Letting scheme. The Mayor's Seaside and Country Homes initiative can play a similar but more general role.

3.1.33 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. More than 60% of older people in London are home owners[202] and local authorities should seek to encourage provision of a range of housing options which reflects the diversity of tenure amongst older households.

3.1.34 London-wide implementation of Lifetime Homes standards on all new housing development, and of the wheelchair accessible/adaptable standards on 10% of new provision (Policies 3.8B c & d), means that London's housing stock will be able increasingly to accommodate these needs as a matter of course (see Part 2 of this SPG).

3.1.35 The needs of active older Londoners must be a particular consideration for LDFs in implementing the concept of 'Lifetime Neighbourhoods' in line with LP Policy 7.1. This recognises that good physical access to shopping and other services

197 Lifetime Homes, Lifetime Neighbourhoods A National Strategy for Housing in an Ageing Society CLG DoH DWP 2008
198 Current provision and emerging trends for housing and care for older people in the United Kingdom An Overview PRP August 2010
199 National Housing Federation. Breaking the mould Re-visioning older people's housing. NHF, 2011
200 Data from the 2001 census suggests that more than 500,000 homes in London are under-occupied by an older household. The majority (80%) of these properties are owner-occupied but 61,000 of them are social rented. Source: Office of National Statistics. Census 2001. ONS, 2001; ONS commissioned table C1080. Older person households defined as aged 50 and over

201 Mayor of London. Revised London Housing Strategy. GLA, 2011, for consultation with the public.
202 POPPI based on 2001 census ibid

can enhance social relationships across the community at large and, in particular, redress isolation among older people. The Outer London Commission[203] suggests, and independent consultants confirm[204], that this makes town centre or edge of centre locations particularly appropriate for new, purpose built accommodation, especially for the active elderly. The Plan's new private outdoor space standards will help address concerns that higher density development in such places might make them unsuitable for this group.

More specialised housing and registered care accommodation for older people

3.1.36 The future requirements for older people's specialist housing summarised in 3.1.29 and Annexes 5 and 6 underscore the central thrust of policy 3.8B e – to increase provision to meet need. Taking into account this, and other relevant local and strategic objectives, Boroughs should plan positively for specialist provision for older people, including though local plan allocations. 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 provision[205]. Consultants report that London-wide coverage of such policies is uneven. Boroughs should ensure that they are developed to address local and strategic specialist need effectively.

3.1.37 National guidance on assessing this need at local level remains extant at the time of writing[206], and in the unique circumstances of the London housing market should be placed in the relevant sub-regional and regional context (see para 3.1.4 above). Projections of specialist requirements should take into account not just the growth likely to arise from an ageing population and movements from mainstream to more specialised provision, but also that which may be generated by closure of existing stock, changing tenure patterns among older households and estimates of the affordability of the range of possible products. Boroughs may wish to draw on publicly available toolkits[207]/ data[208] when preparing these projections.

3.1.38 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, or as the consultants suggest in their typology in para 3.1.27 above), by boroughs and other partners enabling them to chose different forms of sharing which will reduce under-occupation and housing costs.

3.1.39 The closure of existing 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 to pressures for change to

203 Outer London Commission. Second Report to the Mayor. GLA, 2012
204 Cambridge et al 2012 ibid
205 CLG NPPF 2012 ibid para 50, LP Policy 3.8B e. Boroughs may wish to draw on Annexes 5, 6 and to para 3.1.29 to this SPG to inform local assessments of need for specialist housing for older people - see paras 3.1.32 above
206 CLG SHMA 2007 ibid para p55

207 Eg Housing LIN/National Housing Federation. Planning ahead: effective planning for housing and care in later life. Forthcoming
208 Cambridge et al 2012 ibid Annex 3

higher value uses, especially mainstream housing.

3.1.40 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 Inspection[209]) 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, not least because some developments incorporate elements of both.

3.1.41 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 and is self contained then it is usually C3, if not it is C2. 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, might appear to be an arbitrary and perhaps dated planning distinction.

3.1.42 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. This may be constraining provision in some boroughs but not in others. 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.

3.1.43 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 to identify developer contributions are sufficiently sensitive to take these additional net costs into account. This may require 'bespoke' viability assessments (and, if necessary their independent validation) rather than application of, say, standard C3 charges or running a viability model as if the proposal was standard C3. 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 requirements[210], this requires a thorough appreciation of viability.

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

210 CLG NPPF 2012 ibid 173 - 174

3.1.44 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(see para 3.1.43 above);
- needs assessments;
- availability of development capacity;
- relevant public subsidy;
- the need to encourage rather than restrain development; and
- promotion of mixed and balanced communities.

3.1.45 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 it may limit development. In reality, it 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.

3.1.46 In coming to a view as to whether a proposal for specialist provision is acceptable in terms of paras 3.1.43 - 44 above, boroughs should bear in mind that consultants[211] have identified a particular emerging need for intermediate specialist housing to meet the requirements of those who do not have adequate private resources and 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.

3.1.47 The Plan promotes mixed and balanced 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).

211 Cambridge et al 2012 ibid Appendix 7

3.1.48 The independent HAPPI Panel report[212] provides useful examples of a range of sheltered and extra care housing schemes in the UK and abroad, highlighting key design recommendations that improve quality of life and contribute to well being for older people, and identifying planning policy approaches that encourage greater housing choice.

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

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

Communities with larger families

3.1.50 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.

3.1.51 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 housing quality, 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.

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

3.1.52 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. The Census Atlas of London[213] suggests that these communities may be concentrated in inner London, sometimes in localities characterised by concentrations of social rented accommodation. 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.

3.1.53 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 the sample base may have to be 'boosted' 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.

3.1.54 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.

3.1.55 Paras 1.2.14 -15 and 3.1.17 of this SPG provide support for locally justified protection of large private dwelling for occupation by families and para 3.1.20 makes clear that, while there is an overall surplus of large private homes across London, new provision can be justified in light of local need.

Supported housing

3.1.56 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.

3.1.57 London boroughs, acting as commissioning bodies in partnership with local health, voluntary sector and other agencies

213 GLA. DMAG. A 2001 Census Ward Atlas of London. GLA, 2006

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.

3.1.58 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

3.1.59 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 economy[214]. 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 some uncertainty[215] as to future growth in student numbers (which will make monitoring particularly important) it is estimated that there could be a requirement for 18,000 to 27,000 places between 2011 and 2012.

3.1.60 The Plan's 17,000 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. It is therefore monitored separately as part of overall housing provision (LP paragraph 3.53).

3.1.61 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.

3.1.62 The Mayor took the opportunity presented by consultation on the draft of this SPG to test views on a range of issues bearing

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

215 DTZ. London Student Accommodation. DTZ, 2011

on London's academic sector and its relationship with the capital as a whole and which might be addressed by his proposed forum of relevant partners (see LP para 4.54). In light of the response to this consultation he proposes to work with these partners to investigate ways to:

- disperse pressures for student accommodation away from areas in and around central London to locations which are conveniently accessible for students, which can offer competitive alternative provision and which can contribute to local economies;
- encourage greater cooperation between higher education institutions (HEIs) and local authorities in bringing forward this provision;
- develop measures to make student accommodation more affordable;
- establish whether the quality of this accommodation should be improved, and if so how;
- identify and address more specific spatial issues associated with student accommodation;
- address local concerns over social mix involving students and the wider community;
- enable HEI related development to contribute more effectively to local economic development;
- enable academic estates to be managed more effectively to enhance their offer, reduce costs, and contribute to wider strategic objectives for London;
- encourage greater synergies between academia and business;
- enable academia to contribute further to promotion of London as a world city as well as a centre of academic excellence; and
- address other relevant strategic issues which bear on London's academic sector and its relationship with the capital as a whole.

Gypsy and traveller provision

3.1.63 The Mayor is clear that "people from different communities should be free to lead their lives in different ways subject to the need for mutual respect and responsibility ….. the planning system should ensure fairness between the settled and traveller communities" (LP Paragraph 3.56). He recognises that meeting the needs of gypsies and travellers including travelling show people is a strategic issue. 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. The LP (Policy 3.8B i) therefore requires boroughs to ensure these needs are identified and addressed by them in line with national policy[216], in coordination with neighbouring boroughs and districts as appropriate.

3.1.64 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.

3.1.65 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.

216 CLG. 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 social 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 (LP para 3.60) or to ensure that the appearance/ form of development integrates rather than distinguishes tenures (LP 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 (see also paras 2.3.13 - 16 and paras 4.5.1-4.5.4 re thresholds of this SPG).

3.2.4 In 2001, 56 per cent of wards in London were more than three quarters market housing (owner occupied and private rented), while 0.5 per cent of wards were more than three quarters social housing. There were negligible levels of shared ownership homes identified in the 2001 Census. In total, half of London's social 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 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 It should be noted that across London, 55% of **MSOAs** are more than three quarters market housing and 14% are more than fifty per cent social housing. On the other hand, 56% of **wards** are more than three quarters market housing and 12% are more than fifty per cent social housing. Thus, at pan London level the choice of MSOA or ward makes little difference to the number of areas addressed but it must be borne in mind that in population terms wards are bigger, with an average household population of 4,760 compared to 3,070 for MSOAs.

3.2.9 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 as set out in the LP (Policy 3A.8) and should take account of the need to maximise affordable housing output, and within this recognise the priority attached to affordable family provision.

3.2.10 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 social housing in neighbourhoods with more than fifty per cent social housing

Scheme: St Andrews, Bromley-by-Bow by Allies and Morrison for Barratt London, Source/©: Dennis Gilbert/VIEW

PART 4

AFFORDABLE HOUSING

4.1 INTRODUCTION

4.1.1 This section provides guidance on implementing the housing policies in the London Plan (LP) to secure affordable housing. As the new Plan makes clear, this is a particularly important issue for London. In June 2012, the average price of a market home here was £392,000[217] and lower quartile prices for market housing were 80% higher than in the country as a whole[218], 57% higher than in the East of England and 36% 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 nine times[219]. Private rental costs are also very high in London – the median monthly rent for a two bedroom home was £1,230 in June 2011, more than double the national median of £570/month[220].

4.1.2 The former National Housing and Planning Advisory Unit[221] and the GLA's own Strategic Housing Market Assessment[222] have shown that regardless of short term, cyclical changes in the housing market, affordability will remain a particular long term issue for London. Increasing overall housing 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"[223]. If any local plan seeks to do less than this it will challenge the basic tenet of new national policy as well as the London Plan. 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 development[224].

4.1.4 As the London Plan already does, 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[225]" NPPF policies[226]. Because London is a housing market area for planning purposes[227], 'full' needs here include those originating from outside as well as within a borough - an

217 ONS House Price Index, June 2012 http://www.ons.gov.uk/ons/rel/hpi/house-price-index/june-2012/stb-jun-2012.html
218 Communities and Local Government. Housing Live Tables, http://www.communities.gov.uk/housing/housingresearch/housingstatistics/livetables, Table 583
219 CLG Housing Live Tables ibid, Table 576
220 Valuation Office Agency. Private Rental Market Statistics. VOA, September 2012
http://www.voa.gov.uk/corporate/statisticalReleases/110929_PrivateResidentialRentalMarketStatistics.html
221 National Housing and Planning Advisory Unit (NHPAU). More homes for more people: advice to Ministers on housing levels to be considered in regional plans. NHPAU, 2009
222 Mayor of London. 2008 London Strategic Housing Market Assessment (SHMA), GLA, 2009

223 CLG. National Planning Policy Framework (NPPF). CLG 2012 para 14
224 CLG NPPF 2012 ibid para 7
225 CLG NPPF 2012 ibid para 47. See also para 159
226 In representations on the Revised Early Minor Alterations to the 2011 London Plan, government has not demurred from the Mayor's proposition that in London the Plan should be the London expression of the NPPF, and has agreed that its approach to affordable housing is aligned with national policy. This will be tested at EIP in late 2012.
227 Mayor of London LP para 3.15

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. The new Affordable Rent product, which can address a particularly broad spectrum of need for affordable housing, will have a central role in addressing these challenges.

4.1.5 The NPPF supports the London Plan in requiring local plans to "identify the size, type, tenure and range of housing… and where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified[228]". Similarly, in its requirement to pay "careful attention to viability and costs", deliverability and, in plan making, to be "aspirational but realistic"[229], the NPPF supports the Plan in seeking to make the best use of available affordable housing resources (Policies 3.11, 3.12).

4.1.6 Though the Plan was published before the NPPF, it is clear from the above that it resonates very closely with it. Thus, for example, though the Plan does not currently address the new Affordable Rent product in its own right as a matter of policy, it does recognise it as a matter of fact. For the purposes of implementation, the Plan's broad policies are sufficiently flexible to use Affordable Rent in addressing the identified spectrum of Londoners' affordable housing needs. In providing guidance on this matter, this SPG is therefore not introducing new policy.

228 CLG NPPF 2012 ibid para 50
229 CLG NPPF 2012 ibid paras 154, 173

4.1.7 The Mayor has consulted on a Revised Early Minor Alteration[230] to more formally establish the general principle of the Plan as the strategic, London expression of the NPPF and, in particular, to bring the Plan's definition of affordable housing into line with that of the NPPF. Until that time the current NPPF definition of affordable housing, which includes Affordable Rent, and which post-dated the Plan, should be used when implementing the Plan's policies (see para 4.2.1 below).

4.2 DEFINITION OF AFFORDABLE HOUSING

4.2.1 The Plan's definition of affordable housing below is derived from the June 2010 PPS3 definition.

POLICY 3.10 - DEFINITION OF AFFORDABLE HOUSING

Strategic and LDF preparation

A Affordable housing includes social rented and intermediate housing (see paragraph 3.55), provided to specified eligible households whose needs are not met by the market and should:

a meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices

b include provisions for the home to remain at an affordable price for future eligible households, or

230 Mayor of London. The London Plan. Spatial Development Strategy for Greater London. Revised Early Minor Alterations (REMA). Consistency with the National Planning Policy Framework. GLA, 2012

c if these restrictions are lifted, for the subsidy to be recycled for alternative affordable housing provision.

4.2.2 Boroughs are advised that, rather than using the definition in Policy 3.10 above, in order to conform with the NPPF they should use the definition set out below. It is the Mayor's intention[231] that this will be incorporated formally within a revised version of the Plan at the earliest opportunity.

231 Mayor of London REMA 2012 ibid

Affordable housing: Social rented, affordable rented and intermediate housing, 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.

Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), 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 Homes and Communities Agency.

Affordable rented housing is 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).

Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.

Homes that do not meet the above definition of affordable housing, such as "low cost market" housing, may not be considered as affordable housing for planning purposes.

CLG NPPF 2012 ibid Glossary

Social rented housing

4.2.3 In defining social rented housing boroughs, developers and others are advised to use the definition in the NPPF as outlined above. 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.

4.2.4 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 members of the household).
- Housing provided on a temporary basis.

4.2.5 It is important to note that at least for the duration of the 2011-15 investment round, Government anticipates that funding of "social rent provision will only be supported in limited circumstances. For example, social rent could be considered in regeneration schemes where decanting existing social tenants into new homes is necessary. In all cases, providers, supported by the relevant local authorities, will have to make a strong case to demonstrate why Affordable Rent would not be a viable alternative[232]". However, this does not preclude Boroughs supporting provision of social rent through application of their own resources eg their own land or funds, although 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 LP Policy 3.11 and paragraphs 4.3.2 – 4.3.28 of this SPG. The HCA has stated that it will "consider such cases where this results in the level of HCA funding requested offering similar value for money to that achieved for Affordable Rent offers".

4.2.6 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 and conflict with LP Policies 3.11 and 3.12. They are similarly advised not to put in place polices requiring specified proportions of social rented housing or specified rental levels which will constrain realisation of this potential. A more flexible approach, combining affordable and, where appropriate and viable, social rent, will in almost all cases better realise development potential for affordable housing; support a broader social mix; and also generally address the need for affordable family housing at or around guideline target rents determined through the national rent regime ie those associated with social rented housing (see paras 4.2.13 - 4.2.18 below).

Intermediate housing

4.2.7 Boroughs are advised to draw on the NPPF (above) for a 'headline' definition of Intermediate Housing and to add the distinct London dimension to this provided by LP paragraph 3.61. This sets out the gross household income eligibility ranges for Intermediate housing in London. These ranges are published annually in LP Annual Monitoring Reports 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 - £64,300, and for households requiring more than two bedrooms the pan London upper limit is £74,200. LP Paragraph 3.61 makes clear that these are strategic thresholds - "qualifying prices and rents should be set locally to recognise the individual characteristics of local housing markets".

4.2.8 Extension of the upper limit to £74,200 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

232 CLG Framework 2011 ibid, paragraphs 4.20 – 4.23

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). By way of comparison, the Government's national income threshold for determining eligibility for intermediate housing products has remained unchanged – at £60,000 - since 2004, and does not afford the scope for local flexibility provided by the NPPF[233].

4.2.9 For planning purposes, intermediate housing can include a wide range of products based on discounted market ownership such as shared ownership, shared equity, sub-market rent and market provision for outright purchase such as low cost homes for sale, providing the above planning criteria are met. The Mayor's London Housing Strategy[234] gives further advice on the range of intermediate housing products, including the First Steps housing scheme.

4.2.10 Local planning authorities should seek to ensure that intermediate provision is for households within the full range of incomes below the upper limit, and provides 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. They should also seek to ensure that average housing costs, including service charges, to households for whom intermediate housing is provided are affordable.

233 CLG NPPF 2012 ibid para 10

234 Mayor of London. A revised London Housing Strategy (LHS) – initial proposals. Consultation with the London Assembly and GLA Group. GLA, 2011

4.2.11 The Affordable Homes Framework programme notes that "affordable home ownership will need to provide good value for money and increase overall affordable housing supply. Offers from providers…. that only include affordable home ownership, with no Affordable Rent within the overall proposal, will not be considered…. In order to ensure the best value for public resources, there will be a strong presumption that funding is not required for affordable home ownership on S106 sites, as planning gain is expected to provide sufficient subsidy"[235]. Government expects "shared ownership to form the main element of the affordable home ownership offer to ensure that households on a range of incomes can be assisted"[236].

4.2.12 In ensuring that these 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. As noted below (paragraphs 4.2.19 - 4.2.20), 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.

235 CLG Framework 2011 op cit, paragraphs 4.5- 4.6

236 CLG Framework 2011 op cit, paragraph 4.9

Affordable Rent

4.2.13 In April 2011 government introduced a new affordable rent product, intended to meet the same housing need as social rent. It is intended to "allow a more diverse offer for the range of people accessing social housing. Affordable homes will be made available to tenants at up to a maximum of 80% of the gross market rent (which will take account of the service charge for that property, where applicable) and allocated in the same way as social housing is at present[237]".

4.2.14 Rents for the new product will be set by Registered Providers on a scheme by scheme basis. The gross market rent benchmark will reflect the property size, location and other characteristics of the property. According to the affordable rent investment framework, nationally "it is expected that providers [will] utilise the flexibility to charge rents of up to 80% of market rents to maximise financial capacity. The HCA would need to understand how any proposal to charge lower rents would help to meet particular housing needs, deliver value for money for the taxpayer and generate the capacity required to deliver new supply aspirations….. There may be specific circumstances where it is appropriate to set rents at less than 80% of market rents. For example, providers may wish to charge a lower rent where a rent at 80% of market rent would exceed or be close to the relevant Local Housing Allowance (LHA) cap …..[238]"(see para 4.3.28 of this SPG).

4.2.15 The HCA states that "[registered] provider requests for HCA funding to support delivery of new supply are expected to be the minimum necessary for delivery to be viable, taking account of contributions from other sources of funding[239]" (which are expected to include S106 contributions). Local authorities will also play a key role in the delivery of the new product "both through their strategic housing role and as local planning authorities. This requires them to set out the affordable housing requirements for their area and ensure that the planning policies that they set in development plans (which in London include the LP) help them to meet those requirements. It is therefore essential for local authorities, developers and registered providers that there is clarity that the new Affordable Rent product is considered to be affordable for planning purposes[240]".

4.2.16 For investment purposes, the Mayor has agreed a strategic, London-wide average rent at 65% of market rent across the 2011 – 15 affordable housing investment programme, taking into account the need to provide family-sized housing at a lower proportion of market rents (further details are provided in the London Housing Strategy[241]). To achieve this 65% pan London **average**, the business plans of the 63 Registered Providers which will deliver the programme require the flexibility to operate on a scheme by scheme basis which is sensitive to local variations in market rents, and within each scheme, the scope to enable smaller units to effectively cross subsidise family homes.

4.2.17 For planning purposes, site by site flexibility and scope to address a wide

237 CLG Framework 2011 op cit, page 6
238 CLG Framework 2011 op cit, paragraphs 3.4, 3.10, 3.11
239 CLG Framework 2011 op cit. paragraph 2.26
240 CLG Framework 2011 op cit, page 5
241 Mayor of London, The Revised LHS 2011 op cit.

range of needs, including those of families who require homes at around target 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%.

4.2.18 Given the clear national definition of affordable rent, guidance from Government[242] and the HCA, and NPPF and LP policy supporting the use of available resources to maximise output, boroughs are strongly advised not to set rent/income levels for this product through the planning system, as to do so would compromise their capacity to meet identified needs and raise serious questions of conformity both with national policy and with the LP. Similar advice is being provided against setting such thresholds in local housing strategies and plans. The Mayor will give particular attention to this issue in considering matters of general conformity with the London Plan and London Housing Strategy.

Low cost market housing

4.2.19 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 form a useful part of overall housing mix nonetheless. 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, the criteria relating to in perpetuity and/or recycled subsidies and income set out above.

Ensuring affordable provision for the future

4.2.20 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, subject to the Right to Buy/Right to Acquire, where applicable.

4.2.21 Schemes funded by the Mayor need to meet his investment criteria. 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.

242 Grant Shapps MP Minister for Housing and Local Government. "I am aware that some local authorities' intention to intervene and set arbitrary rent caps is likely to have a detrimental effect on the delivery of the Affordable Rent homes by housing associations…. We should also recognise that reintroducing rent controls 'via the back door' of planning policy is likely to hinder the supply of affordable and private rented accommodation, reducing choice for tenants and simply meaning less housing is available for rent. This will not be in the public interest for Londoners". Letter to Mayor of London re "London Plan: Supporting affordable housing in London" in response to REMA 2012 op cit. CLG, 2.8.12

Student housing

4.2.22 As noted in Part 3 of this SPG, student housing should not be considered as equivalent to 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 social housing and intermediate provision and should not be counted against targets for either of these provision categories – see paragraph 3.53 of the LP. Similarly, where a development is solely for student housing, it would not normally be appropriate for the borough to seek social rent or intermediate housing provision through a planning obligation.

Key worker provision

4.2.23 "The national prioritisation of key workers has been removed with local authorities able to consider key workers within their locally determined priorities"[243]. This provides boroughs with the flexibility to consider priority for certain groups of key workers for access to intermediate housing, mindful that intermediate provision will not be affordable by all key workers, some of whom will require social/affordable rent housing.

4.2.24 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 should be addressed in local plans (see para 3.1.10 of this SPG)

243 CLG Framework 2011 op cit, paragraph 4.14

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 seek an average of at least 13,200 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 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 rented and intermediate housing and reflect the strategic priority accorded to provision of affordable family housing.

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

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 paragraph 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 borough's contribution towards meeting strategic affordable housing targets in light of the framework set by the Plan and guidance in SPG, and providing a robust basis for implementing these targets through the development control process.

The strategic 13,200 affordable homes target

4.3.2 Paragraph 3.64 of the Plan outlines how its 13,200 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 am average annual requirement for 18,200 affordable homes. Following national guidance, the Mayor then took account of a range of other 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. In his view, a target which does not recognise these will be of little practical value in guiding and monitoring future output. Of these factors, the availability of resources over the term of the Plan is of major importance.

4.3.4 The Mayor is aware that some studies suggest that London's affordable housing needs could be higher than the 18,200 indicated by the SHMA. However, there is little point incorporating these higher figures in a **provision** target to be used for practical planning purposes. Conversely, a lower target predicated, say, on short term

economic trends and their implications for affordable housing investment would be not only contrary to historic experience, but would also not provide the ambition necessary to achieve the Mayor's vision for London.

4.3.5 Policy 3.11A follows this approach, seeking an average of at least 13,200 affordable dwellings per annum over the term of the Plan. By adopting an average the Mayor recognises that over 20 years annual output may go up as well as down. By using the 13,200 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 4.3.24 below).

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 affordable 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, which should be based on clear and robust evidence so that general conformity with the LP's affordable housing policies can be demonstrated.

4.3.7 Paragraph 3.69 of the Plan states that the Mayor will provide guidance on the local implementation of the strategic social/ intermediate mix. The forthcoming minor alteration to the Plan will formally add Affordable Rent to the social element of this mix. In the meantime, boroughs should set targets taking account of the fact that as a matter of national policy Affordable Rented is intended to address the housing need of those eligible for social rent. Given this, and that it is likely that there will be considerable overlap between affordable and social rented housing in terms of rent levels, affordable and social rent should be considered together.

4.3.8 By raising the target for intermediate housing to 40% (from 30% in the 2008 Plan) the replacement Plan will do more to help Londoners get a first step on the market housing ladder, freeing up social rented homes and securing 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). Further information is given in the Mayor's new London Housing Strategy.

The strategic priority for affordable family housing

4.3.9 The strong strategic priority (LP 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.

4.3.10 While market cost has a bearing on the need for family sized intermediate affordable housing, the other factors bear especially on need for social housing – for example, family overcrowding alone has increased by a third since 2007. This has been exacerbated by the decline in output of new, family sized, affordable homes. The SHMA indicates that 40% of the future requirement for new social housing will be for homes with four or more bedrooms and that there is substantially more need for social than for intermediate family housing. The potential contribution of the new Affordable Rent product to meet these is outlined below (paragraphs 4.2.13 – 18, 4.3.27 – 28). The wide range of intermediate products means that they can also address a spectrum of needs, including helping tenants getting a foot on the private market housing ladder. For short term investment purposes, the draft revised London Housing Strategy anticipates that "36 per cent of new Affordable Rent Homes allocated funding in 2011 – 15 will be family sized housing with three bedrooms or more, with rents within the welfare caps".

4.3.11 Most of the market housing stock is already family sized and the significant growth in single person households in particular means that new demand for market homes is concentrated on one and two bed dwellings. In net terms there is little demand for those with four or more bedrooms. There are of course local departures from this general trend and Policy 3.12Cb provides flexibility for locally justified departures from the pan London approach to enable boroughs to address local circumstances.

Assessing local housing requirements

4.3.12 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 new LP recognises this, while acknowledging there is very considerable local variation within it, and that these variations pay little heed to administrative boundaries. Now supported by the new Duty to Cooperate, especially across housing market areas[244] , and the strong emphasis the NPPF places on identifying (and addressing) the full range of needs[245], 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 anticipates that "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, rather than relying solely on assessments of need at borough level when setting targets.

4.3.13 At London wide level, the Mayor looks forward to working with partners to review the London wide SHMA, exploring cost effective ways in which this can add value at the local level (making use of the 2011 Census results). In the meantime, the Plan supports the already advanced

244 CLG NPPF 2012 ibid paras 179 - 181
245 CLG NPPF 2012 ibid para 47, 159

working to prepare sub-regional needs assessments (which have in some cases been successfully cascaded to individual boroughs). Sub regional assessments have been completed in all sub regions. Some boroughs have also conducted their own housing market assessments to further inform development of their housing targets.

4.3.14 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.

Mixed and balanced communities and local affordable housing targets

4.3.15 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.

4.3.16 This has a bearing not just on the balance between private and affordable tenures, but also within the affordable tenure between social/affordable and intermediate rent. 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. Affordable Rent, with its relatively wide spectrum of associated rental levels, has considerable potential to support mixed and balanced communities.

Housing capacity and local affordable housing targets

4.3.17 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 provision targets). This is important not just to maximise affordable output, but also to address "overall ambitions for affordability across the housing market[246]" and to provide an authoritative basis for local targets (especially those based on percentages). Earlier guidance has shown how the Mayor

246 CLG. Planning Policy Statement 3: Housing (PPS3). CLG, 2011, paragraph 33

has sought to produce overall housing provision figures which are as convenient and "ready to use" as possible (see Part 1 of this SPG, LP Policy 3.3), but to ensure that subsequent local targets are robust in terms of PPS3 requirements, boroughs are advised to also demonstrate that they have taken into account any further capacity which may have come forward since the SHLAA[247] was completed. These new potential sources of supply may include:

- net new build provision including net gains from estate regeneration and other affordable housing such as that provided from developer contributions;
- net gains from conversion including net gains from conversion of non-residential premises to residential use, offset by net losses from de-conversions and losses of residential premises to non-residential uses;
- new provision of non self-contained household spaces (for example hostels and houses in multiple occupation); and
- long-term vacant property (defined as vacant 6 months or longer) brought back into use through local authority action or otherwise. Where vacants increase this will be a negative figure.

4.3.18 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.

247 Mayor of London. The London Strategic Housing Land Availability Assessment and Housing Capacity Study (SHLAA). GLA, 2009

4.3.19 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

4.3.20 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 deliverable[248]". The importance of addressing this requirement has also been underlined in case law.

4.3.21 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 historic, but still extant, national guidance cannot be applied in a mechanistic way. The pan London SHLAA (which informed the affordable housing

248 CLG NPPF 2012 ibid para 173

target) **was** subject to both a strategic viability assessment[249] and a more specific appraisal of the costs and benefits of introducing new housing standards[250], and the approach to developing the Policy 3.11 strategic housing target also took into account resource availability and subsidy.

4.3.22 While boroughs might usefully draw on these strategic studies to provide a context for their local responses to government requirements, they are advised not to rely on them 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).

4.3.23 Boroughs are reminded that the Three Dragons Development Control Toolkit (paragraphs 4.4.34 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 values in the Toolkit have been updated for 2011/12, but should be complemented by more local data. As noted in para 1.1.4 above, the Local Housing Delivery Group[251] 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 RICS[252] and others that a Market Value based approach is the only acceptable basis for viability appraisal. There is a range of valuation methodologies that can be used to assess viability in particular cases, and the usefulness and robustness of a particular approach in providing a basis for informed decision making is the key criterion for deciding which to use in each case. Viability issues are discussed further in para 4.4.33 of this SPG. For the longer term, the London Strategic Housing Market Partnership is evaluating how the Toolkit can be updated more systematically for policy as well as development control purposes.

The expression of local targets

4.3.24 While the Mayor has set a strategic numeric target in the LP to clearly quantify the scale of future provision, at 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

249 BNP Paribas and Atkins. GLA Strategic Housing Land Availability Assessment and Housing Capacity Study (SHLAA) Viability Assessment. Pre-Publication Draft. GLA, 2010

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

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

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

development proposals. 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.

4.3.25 The key points they should bear in mind are that the LDF must have a target (a national requirement) and it (or they) must reflect the Borough's contribution towards meeting the strategic London affordable housing target and provide a robust 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 LP policy.

The Affordable Rent product and target setting

4.3.26 **The 60/40 split:** government's definition of Affordable Rent (see para 4.2.13 above) makes it clear that it is intended to address similar types of need to traditional social housing. Thus, from a London-wide perspective, it is categorised as helping to meet the 60% social housing component of the over-arching 13,200 affordable homes target. To be conformable with national and London Plan policy, Boroughs are strongly advised to categorise it in the same way when setting their local expressions of the strategic 60/40 split in line with LP policy 3.11 and NPPF para 50.

4.3.27 Given that Affordable Rent funding is almost the only source of government investment in affordable housing for the 2011 – 15 round, 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" (LP Policy 3.11) and "the availability of public subsidy" (LP 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 best use of affordable housing resources, which are focused largely on the new product.

4.3.28 Despite the qualification of 'up to', the reference to 80% of market rent in the definition of the new product has caused concern that such a rent might be applied to all units in a scheme. It is stressed firstly that that this is a nationally set maximum figure and will not apply to all schemes. Secondly, the higher percentages of market rent within individual schemes (possibly but not invariably up to 80%) will only apply to some of the units - on average, family units will be around target rent levels (see paras 4.2.16 – 4.2.17 above). The Mayor and partners are continuing to explore ways to address the implications of the £26,000 total benefit cap for occupation of Affordable Rent housing in some parts of London. For the reasons given earlier (paragraphs 4.2.16 – 4.2.17, 4.3.9 - 11), boroughs are strongly discouraged from seeking to constrain operation of the Affordable Rent product on a scheme by scheme basis, through planning policy, as this is likely to be counter-productive in terms of overall provision, and difficult to justify as being in general conformity with LP and NPPF policy.

4.4 AFFORDABLE HOUSING ON INDIVIDUAL SCHEMES

4.4.1 Within the national presumption in favour of sustainable development[253], and to realise this in London, the overarching requirement to maximise affordable housing output and give priority to family provision, a careful balance has to be struck between a range of sometimes competing issues which can arise with individual development proposals. 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 4.3.12 – 4.3.13 on housing requirements, Part 3.2 and paragraphs 4.3.15 – 4.3.16 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 and 3.10 and 3.11

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.

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.

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 and character of affordable housing appropriate

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

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 Any site suitable for housing provision should normally be considered suitable to provide some affordable housing – the site size thresholds in Policy 3.13 (see Part 4.5 below) do not prevent seeking it on sites smaller that the threshold. While site constraints may limit the provision of family housing, this should not preclude the provision of affordable housing for households without children, whether as affordable or social rented housing or as intermediate provision. Off-site provision should only be made in the circumstances set out in paragraph 4.4.17 below.

4.4.4 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 LP 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 identified Londonwide needs) for different types of provision, including particularly the need for family dwellings, adjusted to reflect locational factors, social mix policy, LP and local policy on density and housing design and quality.

4.4.5 Registered Providers and their private development partners are strongly encouraged to work together (see para 4.4.26 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 application[254]. Boroughs are strongly advised not to 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 4.4.4 above. The CLG/HCA Affordable Housing Investment Framework is also clear on this - it is for Registered Providers not boroughs to set rental levels, and the point has been confirmed by government in responding to an Early Alteration to

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

the London Plan: "rents will be set in negotiation between the Registered Provider and the Homes and Communities Agency and the Greater London Authority[255]".

4.4.6 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. Government has confirmed that the GLA will provide details of circumstances where, as a matter of housing investment policy, variations to the Affordable Rent 80% maximum of market rent may apply.

4.4.7 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 spectrum of sources available for affordable housing investment in line with Policy 3.12.

4.4.8 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 new 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, except in relation to estate regeneration as set out in paragraphs 5.1.9 - 5.1.14 below. In 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.

4.4.9 Where a borough has not as yet adopted a borough-wide target which is consistent with LP Policy 3.11 and new 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.

Encourage not restrain housing development

4.4.10 It is essential that an appropriate balance is struck between delivery of affordable housing and overall housing development, especially in current economic circumstances. This can mean recognising that funded affordable housing can in itself enable rather than restrain mixed tenure

255 Bob Neill MP, Parliamentary Under Secretary of State at CLG. Letter to the Mayor of London on Early Alterations to the London Plan 26th March 2012

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 4.4.21 - 4.4.25) 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 NPPF[256].

4.4.11 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. Underpinning this must be a commitment to partnership working between the borough, developer, registered providers and, where appropriate, the Mayor. In circumstances where historic planning agreements, including those to secure affordable housing, are constraining overall delivery of housing boroughs are advised to consider emerging Government guidance on renegotiation of planning obligations[257], and proposals to establish a mediation service to support this. The Mayor is working with partners to identify specific barriers to delivery of homes on a range of individual sites in London and will if necessary produce more general guidance to address this.

256 CLG NPPF 2012 ibid para 173

257 DCLG. Renegotiation of S 106 Planning Obligations. Consultation. DCLG 2012
Ministerial Statement. Housing and Planning. CLG 6.9.12

Intermediate housing flexibility

4.4.12 Some affordable ownership homes have a number of restrictive clauses applied to them through the planning system or lease, limiting to whom the property can be re-sold. The intention behind this is to ensure that such homes are targeted in perpetuity to certain priority groups, for example key workers with a local connection. The unintended consequence of this is that it can seriously restrict mobility in the sector, limiting flexibility in the labour as well as housing markets[258]. Retail mortgage lenders are also cautious about lending towards properties that are subject to onerous conditions or restrictions, because they require the property to be able to be sold within a reasonable length of time.

4.4.13 The GLA appreciates that local authorities are best placed to identify local needs and priorities. At the same time, the GLA has a pan-London remit and would want to encourage a level of consistency in the affordable home ownership offer across all London boroughs. In order to enable the affordable home ownership market to operate more flexibly, planning and lease clauses should be general enough to enable second hand properties to be sold to Londoner's who meet the headline First Steps criteria only. This would ensure that the property remains within the affordable home ownership sector, while creating a pan-London resource to move people around the capital.

4.4.14 In joint working on reducing barriers to affordable home ownership, partners have suggested the use of a 'cascade' mechanism to deal with perpetuity and occupancy controls (not to be confused

258 Mayor of London. The Mayor's Housing Covenant. Homes for Working Londoners. GLA, 2012

with the 'cascade' described in 4.4.40). Where boroughs feel very strongly that there is a local need to place restrictions on the future occupancy of affordable ownership homes, this could be achieved through a clear and time limited cascade of typically two months. A cascade initially restricts marketing of a property to qualifying purchasers within a very local market and gradually widens the net. At the end of the cascade period, if an appropriate purchaser has not been found, the property would be offered up to anyone meeting the headline First Steps criteria.

4.4.15 Boroughs are encouraged to limit the use of restrictive planning and lease clauses, and to consider cascade mechanisms instead. Boroughs are encouraged to work closely with registered providers to arrive at a mutual agreement in terms of the cascade period and the registered providers' typical eight week nomination rights period. This is only likely to be successful as long as there is a clear process for the mechanism within agreed timescales. Alternatively, the local authority or housing association could buy the property back in this situation.

Size and type of housing in different locations

4.4.16 In determining the appropriate balance between social/affordable rented provision 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. The Mayor intends to publish further advice on provision of social infrastructure as part of ensuring lifetime neighbourhoods in due course.
- **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 4.3.15 – 16) mixed and balanced communities

Offsite provision

4.4.17 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[259]. The London Plan resonates with this, stating that "affordable housing provision is normally required on site. In exceptional circumstances it may be provided off-site or through a cash in lieu contribution ring fenced, and if appropriate pooled, to secure efficient delivery of new affordable housing on identified sites elsewhere"(LP paragraph 3.74). The Mayor has proposed that the importance of ensuring that off-site provision is truly exceptional should be underscored as a formal policy concern[260]. Exceptional circumstances include those where, having secured an alternative site it would be possible to:

- secure a higher level of affordable housing on an alternative site
- secure a more balanced community, for example, on sites where there are existing concentrations of particular types of housing (usually social) and there are demonstrable benefits to be gained by providing new units in a different location,
- better address priority needs, particularly family housing
- better sustain strategically important clusters of economic activities, especially in CAZ and the north of the Isle of Dogs where it might be part of a land use "swap" or "housing credit" (see Part 7 of this SPG)

4.4.18 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 (on site plus off site 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.

4.4.19 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 obligations[261]. To avoid incentivising off-

259 CLG NPPF 2012 ibid para 50
260 Mayor of London 2012 REMA ibid

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

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 spectrum of other resources available for new affordable housing, including those for Affordable Rent.

4.4.20 Boroughs should publish their policy on exceptional contributions for off-site provision, which demonstrate that both the criteria above have been applied and that contributions can be utilised to provide a more appropriate output in terms of LP policy (particularly that to maximise additional affordable provision) than could be achieved through on site provision.

Funding affordable housing and development viability

4.4.21 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 deliverable[262]". This is discussed in more detail in paras 4.4.33 – 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 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.

4.4.22 **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 (see below). 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.

4.4.23 **Resources 'in the round':** new arrangements for funding affordable housing move away from a scheme by scheme approach to funding decisions to one that looks at a provider's capacity in the round to deliver a given quantum and mix of outputs in a way which is more closely integrated with its wider asset management strategy over a four year programme. This will be funded from four sources:

262 CLG NPPF 2012 ibid para 173

- Additional borrowing capacity supported by the greater rent income from converting social rent housing to affordable rents, and providing new affordable rented homes
- Existing sources of cross subsidy (from outright sale, for example)
- Homes and Communities Agency (HCA, and in London, the GLA) funding where required for development to be viable, and payable on completion
- Other sources of funding or means of supporting development such as land made available at a discount or on a 'build now, pay later' basis, and other contributions from boroughs or other public organisations

4.4.24 **New funding arrangements:** "In this model, the HCA (in London, the Mayor) will effectively act as a co-funder, sitting alongside delivery partners to secure best value – both in agreeing the initial framework, and through an on-going collaborative approach during the delivery period". This should provide greater scope for integrated, strategic housing and planning working.

4.4.25 Under the new arrangements, the Mayor will fund registered providers. 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 from the sources identified earlier. 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 LP, and recognising the priority for affordable family housing.

4.4.26 **Development partners:** applicants for planning permission should, in conjunction with a registered provider when appropriate, submit appraisals to accompany their application (LP 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.

4.4.27 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. It should also be noted that the Mayor, boroughs and development partners are preparing a protocol which will set out principles for transparent working arrangements including disclosure of information on tenure mix proposed in individual developments.

4.4.28 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 rented and intermediate provision will normally be appropriate on larger sites, having regard to the tenure mix of the surrounding neighbourhood.

4.4.29 **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 4.4.30 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'.

4.4.30 The combination of economic uncertainty and limited affordable housing grant may mean that, to maximise affordable housing output in at least the short term, greater use may have to be made of these 'exceptions' than hitherto. In the case of the indirect subsidy example identified in the third of the bullets in paragraph 4.4.29 above, boroughs should weigh carefully whether relaxing "normal planning requirements" such as those for density are more than balanced by the benefit of securing affordable housing for a particular needs group for whom they may have less relevance than the population as a whole eg small households in the case of relaxing density standards. Care will be needed to ensure that the development as a whole does not compromise the overall intent of LP Policy 3.5 to secure higher quality housing. Such 'nil grant' products may also be secured as bona fide affordable housing in terms of the LP Policy 3.11 definition by non-conventional mechanisms such as covenants, perhaps involving the local authority, rather than the more usual registered providers of affordable housing.

4.4.31 **Affordable Rent:** as an increasingly important means of addressing needs which hitherto have been met by traditional social housing, the new Affordable Rent product will be subject to the policies of this Plan.

4.4.32 In particular, the Mayor intends to address the particular 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 housing 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.

4.4.33 **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 should 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.

4.4.34 The Affordable Housing Development Control toolkit, developed by Three Dragons and the Centre for Residential Development at Nottingham Trent University mentioned earlier is available to boroughs, and they are encouraged to use it. It is also available from the GLA for purchase by other parties. The strategic values within the toolkit have been updated for 2012/13 but boroughs are strongly advised to use more local information which reflects their local circumstances rather than these defaults. In current economic circumstances in particular, Boroughs are 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. The toolkit is subject to a wider review[263] which may lead to methodological refinement or replacement. Further details of the data sources and methodology are set out in the toolkit guidance notes[264].

4.4.35 Other financial appraisal methodologies[265] may be applicable, especially in the case of longer term and phased developments (see also 4.4.40 – 4.4.43). 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

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

264 Mayor of London. GLA Affordable Housing and S.106 Toolkit: Guidance Notes (2010). GLA, 2010
http://www.london.gov.uk/sites/default/files/AH-Toolkit%20Guidance%20Notes%202011.pdf

265 For example, HCA Development Appraisal Tool (DAT) or Argus Developer

mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable" (see para 4.4.21 above) . In light of inference to the contrary[266], 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, not least because of the way it can be used to address the need to ensure that development is sustainable in terms of NPPF and LP requirements.

4.4.36 The results of different types of viability appraisal can be bench-marked to the Three Dragons Toolkit[267], and consideration should be given to the use of independent valuation advice, such as that provided by the Valuation Office Agency. 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. The Mayor intends to prepare further guidance on the use of viability assessments.

4.4.37 **Applications referable to the Mayor:** where an application is referable to the Mayor, the GLA would expect 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.

4.4.38 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.

4.4.39 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. In the case of a single application for a phased scheme, where the availability of resources to fund affordable housing is not guaranteed for all phases, any decision by the Mayor will be conditional upon agreed affordable housing targets for the whole project being achieved (see 'cascade agreements' and 'contingent obligations' (see paragraphs 4.4.40 - 43 below)

Phasing

4.4.40 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 of 'cascade agreements' and 'contingent obligations'. Cascade agreements are intended to deal primarily with uncertainties over/changes to the funding of affordable housing while contingent obligations address economic uncertainties which may arise over the lifetime of a development proposal. They are intended to provide an equitable framework to enable developers, boroughs

266 RICS Financial Viability in Planning 2012 ibid
267 BNP Parisbas Real Estate 2012 ibid

and other relevant stakeholders to work together to maximise affordable housing output in these conditions.

- *Cascade agreements*: in line with ATLAS advice[268], in exceptional circumstances where the availability of grant is not known, S106 agreements may include a cascade agreement, based on financial appraisal, which links the required affordable housing output to the availability of resources for affordable housing. Based on a robust financial appraisal, this agreement 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 that where resources would not be 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.
- *Contingent obligations*: 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".

4.4.41 These arrangements must address the requirements of legislation and national guidance, which can provide the basis for securing affordable housing, as well as recognising 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.

4.4.42 Where a large scheme is built out in phases, consideration should be given to a reappraisal mechanism which specifies the scope of a review of viability for each phase. For schemes with a shorter development term, consideration should be given to using short-term permissions or to using S106 clauses to trigger a review of viability, if a scheme is not substantially complete by a certain 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.

4.4.43 In making arrangements for 're-appraisal' provisions, 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 planning obligation contributions will be ascertained; and
- set out the expectation for additional homes on or off site, or for receiving a financial contribution.

268 Homes and Communities Agency. Investments and planning obligations. Responding to the downturn. Good Practice Note. HCA, 2009

Other scheme requirements

4.4.44 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. Part 2 of this SPG highlights those standards which have particular application to affordable housing eg application of Code for Sustainable Homes Level 4 from 2011. More detailed guidance has been prepared on use of these standards for affordable housing investment purposes[269].

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

4.5 AFFORDABLE HOUSING THRESHOLDS

4.5.1 National planning policy provides the flexibility for the London Plan to set out a strategic threshold for the application of affordable housing policy. The unique circumstances of the London housing market justify setting a threshold of 10 dwellings and the Plan provides strategic support for setting a lower threshold in circumstances where this can be justified.

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.

4.5.2 In determining the size of sites where affordable housing is to be required, boroughs should have regard to Policy 3.4 of the LP. As set out in LP paragraphs 3.77 and 3.88, they should apply affordable housing requirements to all sites where there is a capacity to provide 10 or more units

4.5.3 Boroughs are encouraged to apply a lower threshold than 10 dwellings where appropriate, and include in their DPD/ LDD a justification for applying a lower threshold, having regard to:

- the size and type of sites likely to come forward for development derived from the housing capacity study;
- the contribution to be made from smaller sites to meeting the target for affordable housing provision;
- the capacity of the site to accommodate affordable housing, taking into account other policies in the Plan;
- viability issues (see above); and
- the inclusion of appropriate space standards.

4.5.4 It has been noted that in assessing the viability of smaller sites to support an affordable housing requirement, some boroughs apply a 'blanket' charge per unit, justifying this through sample based viability assessments. Care should be taken that such approaches meet the statutory tests for use of planning obligations set out in regulation 122 of the Community Infrastructure Levy Regulations 2010 (as amended) - particularly the requirements that they should be directly related to the development concerned, and fairly and reasonably related in scale and kind to the development in each case. While such an approach may be appropriate in terms of general planning process, providing predictability, transparency and consistency, there should always be the scope to take account of variations in local housing sub-markets and to avoid 'fossilisation' of values which changing circumstances may mean are no longer relevant to current economic conditions.

4.5.5 In order to 'encourage not restrain' overall development on small sites it may be more appropriate to use individual, up to date viability assessments on a case by case basis. Account should always also be taken of the cumulative impacts of requirements of these kinds, and of site-specific and other requirements to be addressed through planning obligations and the Community Infrastructure Levy, to ensure there are no undue effects on development viability that inhibit delivery of London Plan and other Londonwide and local policies.

4.5.6 In assessing the capacity of smaller sites, the density criteria appropriate to the site location set out in the Plans Sustainable Residential Quality density matrix (see Part 1.3 of this SPG) should be applied sensitively, recognising the need to take particular account of local character when developing small sites in low density, low PTAL parts of suburban outer London (see para 1.3.43 density). Account should also be taken of the scope small sites offer for self build schemes and funding available to support these[270].

4.5.7 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.

270 Email: CBH@London.gov.uk

4.5.8 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. LP 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).

South London Housing, Credit: Mike Newitt

PART 5

STOCK AND INVESTMENT

5.1 LONDON'S HOUSING STOCK

5.1.1 With the target for annual new homes representing less than 1% of existing housing, it is essential that that the overall stock is sustained; that it is kept in good repair and that best use is made of it to meet London's growing and diverse needs. As Policy 3.14 recognises, traditional town planning can provide some help in this, but a spatial planning approach, which brings this together with a range of investment and managerial initiatives, can make a valuable contributions to tackling the issue.

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.

Housing Quality

5.1.2 The Plan notes that, in line with the country as a whole, a third of all homes across tenures in London do not meet national 'decent homes' standards. The problem is concentrated in private rented and council rented housing. It is estimated that 46% of the council-owned homes which do not meet the decent homes standard across the country, are concentrated in London – some 87,000 dwellings[271]. Improving existing stock reduces pressure on London's scarce capacity to accommodate new provision, improves quality of life for residents and typically reduces energy costs for them. The Mayor has worked with boroughs to secure just over half of the funding available nationally to meet the decent homes standard for London.

Retrofitting

5.1.3 LP Policy 5.4 supports retrofitting the existing housing stock across tenures to mitigate and adapt to climate change – a policy which, in the shorter term, will also improve energy efficiency/reduce fuel costs[272]. This will help to bring the stock up to the same standard on sustainable design

271 Mayor of London. The revised London Housing Strategy for consultation with the public. GLA, 2011
272 HM Government. Laying the Foundations. A Housing Strategy for England (Housing Strategy) paras 7.32 – 42. CLG, 2011

and construction as new development (see Section 2 of this SPG and LP Policy 5.3). LDFs can support this by identifying potential synergies between new and existing development through retrofitting energy efficiency measures, decentralised energy systems and renewable energy opportunities. Further detail is provided in the Mayor's Climate Change Mitigation and Energy Strategy[273], the London Climate Change Adaptation Strategy[274], the Three Regions Climate Change Group[275], and English Heritage's climate change website[276].

Supported needs, occupation related housing and under-occupation

5.1.4 Part 3 of this SPG on implementing Policy 3.8 (housing choice) provides guidance on supported needs housing and provision for occupations such as nurses, police officers or hotel staff (see also LP paragraphs 3.80 and 3.83). Proposals for the London Housing Strategy[277] and research into specialist provision for older Londoners[278] underscore the strategic importance of addressing under-occupation[279]. For the affordable housing sector, a target for at least 8,000 under-occupier moves by 2016 is proposed, with a proportion of new affordable developments to be set aside for under-occupiers. These should be given a high priority in local, sub regional and pan-London allocation policies, and Registered Providers will be expected to audit their stocks for under-occupation and introduce systems to address it.

Short term lettings

5.1.5 As one of the hubs of the global economy, there are strong pressures in parts of London (especially within or close to central London) for second homes and non-permanent visitor accommodation. Against this must be set the acute housing needs of full time London residents. The 2001 Census and more recent surveys show that the highest concentrations of second homes are found in Westminster, Kensington and Chelsea and the City of London, though some wards in other central boroughs have significant numbers. There have also been increases in other boroughs, for example Tower Hamlets, which includes part of Docklands.

5.1.6 While these types of provision are important to London's economy, the thrust of national and London policy to increase housing provision for residents means that such uses of the housing stock and potential housing capacity should be resisted. Non-permanent residential accommodation is not counted towards achievement of the London Plan (LP) housing targets. This approach is underpinned by LP Policy 3.14 B to resist loss of housing and Policy 3.14 C which requires boroughs to resist loss of permanent housing provision to short term lettings (lettings less than 90 days).

5.1.7 Boroughs can address this issue through the Local Government Act 2003, which grants them the discretion to reduce the council tax discount on second homes to 10 per cent. They can also use the

273 Mayor of London. Climate Change Mitigation and Energy Strategy. GLA, 2011
274 Mayor of London. London Climate Change and Adaptation Strategy. GLA, 2011
275 Arup for Three Regions' Climate Change Group, London Climate Change Partnership, Sustainable Development Round Table and South East Climate Change Partnership. Your home in a changing climate. Retrofitting Existing Homes for Climate Change Impacts. Report for policy makers. Three Regions Climate Change Group, 2008
276 English Heritage. Climate change and your home. www.climatechangeandyourhome.org.uk
277 Mayor of London. Mayor of London. The revised London Housing Strategy for consultation with the public. GLA, 2011
278 Cambridge University, Three Dragons, Land Use Consultants. The role of the planning system in delivering housing choice for older Londoners. Final report for the GLA. GLA, 2012
279 HM Government Housing Strategy op cit para 6.27

provisions of the Greater London Council (General Powers) Acts 1973 and 1983 and the empty homes provisions of the Housing Act 2004, including Empty Dwelling Management Orders. Under these there is a material change of use requiring planning permission if residential accommodation is used for temporary sleeping accommodation occupied by the same person for less than 90 consecutive nights, or for time-sharing schemes where a number of people have the right to occupy a property for a set period each year. Such changes of use should be resisted together with any proposals for similar types of development if they would result in the loss of development capacity which would be viable in housing use (e.g. surplus office space). The need for non-permanent accommodation, including apart-hotels is more properly addressed through hotels policies and provision.

5.1.8 Consultation on this SPG highlighted a range of issues associated with second homes in and around the Central Activities Zone (CAZ). These will be investigated further in light of the results of the 2011 Census and if necessary be addressed more specifically in the CAZ SPG.

Estate renewal

5.1.9 To address London's housing needs and sustain its neighbourhoods, the Plan (Policy 3.14 B, Paragraph 3.81) is clear that existing housing should be retained where possible, but it does recognise that renewal of the stock can be necessary, especially where it can lead to an increment to provision or better address housing needs eg to meet those of families. Thus, to increase provision densities can also be increased, but, at a minimum, to meet the needs of families there must be no net loss of floorspace.

5.1.10 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 (see Policy 3.9 mixed and balanced communities – note that there is an error in paragraph 3.82 in the Plan referring to Policy 3.19)
- the amount of affordable housing intended to be provided elsewhere in the borough.

5.1.11 As a general guide in line with Policy 3.14 B, where redevelopment of affordable housing is proposed, it should not be permitted unless it is replaced by better quality accommodation, providing at least equivalent floorspace on site.

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

5.1.13 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. It

can, however, take account of 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 a requirement to achieve a wider range of types of provision in a neighbourhood or borough can be demonstrated. Replacement of social by affordable rented provision may be necessary in order to maximise affordable housing provision and boroughs should not seek to impede this.

5.1.14 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 mixed and balanced community. In such a case, the net gain in total provision need not achieve the usual proportion of affordable housing provision expected from a new build development.

5.1.15 Engagement with the existing community[280] should be an integral part of the estate renewal process. Though some upheaval may be inevitable in improving and extending the stock, the impact of this can be minimised by taking account of local residents' views and incorporating these in the phasing and management of renewal.

Empty homes

5.1.16 The Plan supports the NPPF[281] by requiring boroughs to set and monitor targets for bringing vacant homes back into active use[282] (see also para 1.2.39 of this SPG). It sets a strategic target to reduce long term (over 6 months) vacant dwellings to 1% of existing stock, and through a £60 mll fund allocated through the Housing Strategy, the Mayor has come close to this - 4,150 empty homes have been brought back into use over the last three years, reducing the percentage to 1.1%, the lowest level since the 1970s. To sustain this trend he will seek further national resources, maintain the strategic empty homes audit and target dwellings on the English Heritage 'At Risk Register' to bring them back into use. Boroughs' attention is drawn to the scope to address the perverse incentive to leave properties empty provided by discounted Council Tax rates for homes vacant for more than six months and to the need to encourage involvement of the community in bringing empty homes back into use.

280 HM Government Housing Strategy op cit paras 6.17 - 20

281 CLG National Planning Policy Framework (NPPF). CLG, 2012 para 51

282 HM Government Housing Strategy op cit paras 5.1 - 23

5.2 HOUSING DEVELOPMENT AND INVESTMENT

5.2.1 In a period of resource constraint it is particularly important to coordinate the different sources of investment which are available, to ensure they are used most effectively.

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 The Plan notes that achievement of many of the Mayor's objectives for London "will require positive engagement and co-ordination with a very wide range of public, private and voluntary sector stakeholders working to varied timescales and sometimes distinct agendas". As probably the single most important delivery agencies, boroughs are crucial to this process.

5.2.3 The work of the Mayor, boroughs and other stakeholders should now be informed by the changes to arrangements for funding affordable housing in London, and the introduction of wider new national housing priorities which also bear on London through the localism agenda[283]. These include the New Homes Bonus to incentivise new housing development, retention of Right to Buy sales receipts for further housing investment, housing benefit reform, revisions to CIL and the Community Right to Build. As noted above, of particular importance for this SPG is introduction of the Affordable Rent product to address housing needs currently met by social rented housing. However, to appreciate how the new product is to be used it needs to be placed in the context of these wider reforms. They will open up new opportunities as well as requiring changes to long established ways of working. Coordinating housing development and investment outlined in Policy 3.15 and Paragraph 3.85 of the replacement LP remains vital.

5.2.4 From April 2012 responsibility for affordable housing investment in London devolved to the Mayor and the remaining work of the LDA, including its land holdings, was transferred to the GLA. A new Housing Board for London has been established to oversee housing delivery. This is made up of equal numbers of mayoral and borough appointees, chaired by the Mayor. These new arrangements will enable strategic housing investment and planning to be much more closely aligned and provide a stronger basis for integration of housing provision with major infrastructure investments such as Crossrail and the 2012 Games.

283 HM Government Housing Strategy ibid, especially Chapter 3

5.2.5 Leading up to this, the HCA worked in collaboration with the GLA to assess registered providers offers and draw up framework contracts for delivery of affordable housing. "Providers that are raising additional borrowing capacity from the conversion of social rent properties to Affordable Rent in London will be encouraged to reinvest those resources in new supply within the capital"[284] and "will be expected to demonstrate how their proposals meet local priorities as set out in Borough Investment Plans (BIPs) or equivalents. Confirmation of Borough support for new supply proposals will be sought when schemes are identified or indicative proposals become firm"[285].

5.2.6 Government stresses the importance of publicly owned land[286] in contributing to delivery of additional affordable housing and encourages providers to work with public bodies to build out their land banks. In doing this they should aim to minimise other forms of subsidy such as Mayoral housing grant or contributions from the conversion of social to Affordable Rent housing. Where the public body does not transfer their land for free "then it should be willing to share in the risks of development, with the deferred value to be realised over the lifetime of a project"[287].

5.2.7 As explained in Part 4 of this SPG, Government has introduced a more flexible delivery model for new affordable housing including Affordable Rent. This moves away from a scheme by scheme approach to funding decisions to one that looks at a provider's capacity in the round to deliver a given quantum and mix of outputs in a way which is more closely integrated with its wider asset management strategy over a four year programme.

5.2.8 The Mayor anticipated that in London's large and complex housing market this new "programme" based approach might not provide sufficient flexibility to target resources on particular areas. He has therefore worked with partners so that registered providers add a sub regional dimension (based on HCA sub-regions) to their investment programmes."

5.2.9 Local Community Infrastructure Levies (CILs) are being introduced across London and can provide a valuable contribution to the cost of infrastructure needed to support and enable new homes. However, CILs may have an effect on the viability of residential development and this will be tested through the enquiry process. Boroughs are advised to ensure that their evidence demonstrates authoritatively that introduction of CIL at the rates proposed will not compromise strategic and local policy to maximise delivery of housing, including affordable housing.

5.2.10 The new LP has replaced the old Sub Regional Development and Implementation Frameworks with a more focused, easy-to-to use, Implementation Plan. It also introduces more flexible arrangements for sub-regional working which are more fit-for-purpose, as well as more identifiable sub-regions for monitoring the LP.

284 Communities and Local Government, Homes and Communities Agency. 2011 – 2015 Affordable Homes Programme – Framework (CLG Framework) CLG, 2011, paragraph 7.6
285 CLG Framework 2011 ibid, paragraph 7.7
286 HM Government Housing Strategy op cit 2.32 – 37. See also para 1.2.10 of this SPG
287 CLG Framework 2011 ibid, Paragraph 7.13

Scheme: Clapham Library © Gareth Gardner

PART 6

SOCIAL INFRASTRUCTURE

6.1 INTRODUCTION

6.1.1 This section of the SPG gives broad guidance on London Plan (LP) Policies 3.16 to 3.19 on social infrastructure to support London's housing growth. It complements the NPPF's imperative to secure sustainable development[288] and its more specific approach to promoting healthy communities[289]. LP Policy 3.16 *Protection and enhancement of social infrastructure* outlines the key policy requirements. Policy 3.17, 3.18 and 3.19 cover health, education and sports facilities. Detailed guidance on these will be given in further supplementary planning guidance on Shaping Neighbourhoods.

POLICY 3.16 PROTECTION AND ENHANCEMENT OF SOCIAL INFRASTRUCTURE

Strategic

A London requires additional and enhanced social infrastructure provision to meet the needs of its growing and diverse population.

Planning decisions

B Development proposals which provide high quality social infrastructure will be supported in light of local and strategic needs assessments. Proposals which would result in a loss of social infrastructure in areas of defined need for that type of social infrastructure without realistic proposals for reprovision should be resisted. The suitability of redundant social infrastructure premises for other forms of social infrastructure for which there is a defined need in the locality should be assessed before alternative developments are considered.

C Facilities should be accessible to all sections of the community (including disabled and older people) and be located within easy reach by walking, cycling and public transport. Wherever possible, the multiple use of premises should be encouraged.

LDF preparation

D LDFs should provide a framework for collaborative engagement with social infrastructure providers and community organisations:

a for the regular assessment of the need for social infrastructure at the local and sub-regional levels; and

b to secure sites for future provision or reorganisation of provision.

c Where appropriate, boroughs are encouraged to develop collaborative cross-boundary approaches in the provision and delivery of social infrastructure.

E Boroughs should ensure that adequate social infrastructure provision is made to support new developments. If the current use of a facility is no longer needed, boroughs should take reasonable steps to identify alternative community uses where the needs have been identified. Adequate provision for social infrastructure is particularly important in areas of major new development and regeneration and should be addressed in opportunity

288 CLG. National Planning Policy Framework (NPPF). CLG 2012 paras 6 - 15

289 CLG NPPF 2012 ibid Section 8

area planning frameworks and other relevant area action plans.

F The Mayor will work with boroughs, relevant social infrastructure providers and the voluntary and community sector as appropriate to extend proposed supplementary guidance on social infrastructure requirements, especially at the sub-regional and Londonwide levels.

6.1.2 Given the expected growth in London over the next 20 years, it is important to ensure that new housing development, particularly in Opportunity and Intensification Areas (Policy 2.13), Areas for Regeneration (Policy 2.14) and large residential development (Policy 3.7) is supported by the necessary social infrastructure.

6.1.3 Social infrastructure covers a wide range of facilities, including health and education provision, community, cultural, play, recreation and sports facilities, places of worship, emergency facilities and many other local uses and services which contribute to quality of life. Open space in all its forms is an important component of social infrastructure (Policy 2.18). Social infrastructure designed to meet peoples' needs at all stages of their lives is integral to the creation of sustainable lifetime neighbourhoods (Policy 7.1) that hold communities together and promote social interaction.

6.1.4 It is therefore crucial to plan for social infrastructure in tandem with residential development[290] not only to improve the quality of life of residents in new development, but also to avoid placing strain on existing infrastructure to the detriment of existing communities. Boroughs should ensure adequate social infrastructure provision to support major new development and regeneration and identify areas where existing infrastructure is deficient. A broad picture is provided by TfL's Access to Opportunities and Services (ATOS) maps, covering primary and secondary schools, FE colleges, GP surgeries and food shopping. Further, detailed guidance on approaches which may be taken will be provided in the forthcoming Shaping Neighbourhoods SPG.

6.1.5 Many developers now recognise that social infrastructure should be seen as a potential driver of value rather than an additional cost. Investing in social infrastructure can increase both the value of the units being developed and their rate of sale. The British Property Federation (BPF), drawing upon the experiences and knowledge of its members, issued a guide to Planning for Social Infrastructure in Development Projects to inform private sector interests.[291] As well as providing a social infrastructure checklist for developers (see below), the document includes a social infrastructure matrix[292] designed to help assess development proposals. Implementation issues such as management, ownership and ongoing funding are also dealt with in the document. A strong partnership based approach and synergy between developers, communities and boroughs is required to secure sustainable development in the form intended by the NPPF and the Mayor.

290 HM Government. Laying the Foundations: A Housing Strategy for England. (Housing Strategy). CLG, 2011 paras 2.44 - 48

291 British Property Federation. Planning for Social Infrastructure in Development Projects: A guide to tackling the key challenges, BPF, April 2010 http://www.bpf.org.uk/en/files/bpf_documents/Social_Infrastructure_Report__Final.pdf

292 Homes and Communities Agency. Advisory Team for Large Developments. Social Infrastructure Matrix. HCA ATLAS, 2011, http://www.atlasplanning.com/page/topic/index.cfm?coArticleTopic_articleId=47&coSiteNavigation_articleId=47

Scheme: Peabody Estate, Credit: Philip Vile

BPF Social infrastructure checklist for developers

Some of the key messages in the BPF guide are that, in carrying through development projects, particularly those of a substantial scale, developers should:

- recognise the role of social infrastructure provision in place making and its potential as a driver of value in development projects
- get involved where feasible in the process of setting social infrastructure needs
- address social infrastructure issues right from the outset of a development project, ensuring that social infrastructure stakeholders become involved from the very early stage
- identify opportunities for synergy between different components of social infrastructure
- consider timing issues in delivering social infrastructure to ensure that facilities and services remain viable
- set out how the facility will be maintained over the long term.

6.1.6 It makes good commercial sense to address social infrastructure issues right from the outset of a development project, so that the development is attractive to communities and viable as well as being fully sustainable when completed. Boroughs, developers and community representatives should work together to establish future requirements for social infrastructure where they can.

6.2 HOUSING AND EDUCATION FACILITIES

6.2.1 A general trend of rising demand for primary school places across most of the London boroughs is expected over the next 20 years to the point that some local authorities may be challenged in accommodating it. This has been exacerbated in recent years by reductions in the rate of out-migration from London among families with children. It is therefore important that boroughs make the necessary arrangements to promote a good supply of quality school places in areas of current and emerging shortages and in parts of London with poor educational performance, and, in particular, encourage the development of academies and free schools. Schools should be located within an acceptable distance of pupils' homes, within easy reach by walking, cycling and public transport.

6.3 HOUSING AND HEALTH

6.3.1 Poor housing conditions and environments affect health in many ways, through internal conditions such as damp, cold and indoor contamination to the structure of housing and neighbourhoods. Many studies have confirmed that cold homes and dampness in homes all contribute to, and exacerbate, respiratory illness. Overcrowding can also cause stress, sleep deprivation and lack of education achievement.[293] In addition, factors outside the home can affect health and wellbeing. These range from air quality and distance from local healthcare facilities and

293 London Health Observatory. Housing, http://www.lho.org.uk/LHO_Topics/Health_Topics/Determinants_of_Health/Housing.aspx#Reports#Reports and
The Kings Fund. NHS London Health Urban Development Unit. Health Impacts of Spatial Planning Decisions. NHS, April 2009

services, to less tangible but still important factors, such as the degree of community interaction and cohesion, community safety and the visual appearance of a neighbourhood. Housing at risk of flooding or where green spaces are lacking may contribute to poor mental and physical health. The housing standards set out in Part 2 of this SPG will be particularly important in implementing policy to help address the Mayor's health objectives.

6.3.2 Housing development in designated opportunity and intensification areas (LP Policy 2.13) and areas of regeneration (LP Policy 2.14) offers significant potential to improve health and reduce health inequalities. LP Policy 3.2 and the Mayor's Health Inequalities Strategy set out his commitment to ensure new developments are designed and constructed in ways that improve health and reduce health inequalities. Policy 3.2 also encourages boroughs and developers to consider the impacts of major development proposals on the health and wellbeing of communities through the use of Health Impact Assessments (HIA). Design and Access Statements could also show how health and wellbeing outcomes have been considered in all aspects of the design. A methodology for carrying out HIAs will be provided in the forthcoming review of the Mayor's Best Practice Guidance (BPG) on Health issues in Planning.[294] It will also provide guidance for development management to assist in the implementation of LP policies.

294 Mayor of London. Best Practice Guidance on Health Issues in Planning. GLA, 2007

Credit: LTL/Malcolm Cochrane

6.3.3 For the present, boroughs and developers may find helpful to consider the following issues and questions to assess whether housing development proposals provide opportunities for promoting heath and wellbeing:

Housing quality within and around the home

These questions include:

Housing quality and design

Does the proposal encourage and promote housing quality?

- Applying the principles of Lifetime Homes to ensure long-term adaptability for older and disabled people;
- Incorporating generous internal space standards including sufficient storage space and separate kitchen and living spaces;
- Employing modular housing design to allow for future changes in housing demand.

Access to public services

Does the proposal encourage and promote access to good public services?

- By ensuring that account has been taken of the need for different types of social infrastructure, including education, social and community facilities. Have opportunities for the co-location of services been explored?
- Has account been taken of the medium- and long-term requirements for healthcare infrastructure, including floor space, accessible locations, the need for temporary facilities, and funding and delivery options?
- Conversely, have proposals for new health facilities addressed the impact of existing need and changing household composition and the cumulative impact of new development likely to come forward in its catchment area?

Bear Lane, July 09 © Panter Hudspith Architects

PART 7

MIXED USE DEVELOPMENT

7.1 INTRODUCTION

7.1.1 In line with one of the NPPF's core planning principles[295], the London Plan (LP) promotes a mix of land uses to make the most efficient and sustainable use of London's constrained capacity for development. Mixed use development provides a way in which different uses can be accommodated on the same site or in the same neighbourhood, helping to create an attractive sense of place, reducing the need to travel between different activities (such as living and working or shopping and healthcare), and making the best use of scarce land. This section gives guidance on application of these policies across London; it should be read alongside the guidance given on density, design, residential quality and other issues in the rest of this document.

7.1.2 Promoting and requiring mixed-use developments incorporating housing is a key theme of the LP. It contains a number of policies to this effect. Some promote and/or manage mixed use development associated with particular areas for example, those on the 2012 legacy (2.4), outer London (2.7), inner London (2.9), the Central Activities Zone (2.10, 2.11, 2.12), Opportunity and Intensification Areas (2.13), town centres (2.15 and Annex 2), Strategic Outer London Development Centres (2.16). Some give guidance in relation to particular uses such as housing supply (3.3), housing quality (3.5), large residential developments (3.7), affordable housing (3.13), social infrastructure (3.17), employment (4.1), offices (4.2, 4.3), industry (4.4), leisure/culture (4.6) and retail (4.7) Others support it more generically, notably the strategic approach to transport (6.1), and policies on place shaping (7.1), security (7.3), local character (7.4), and architecture (7.6).

7.1.3 While encouragement of mixed use development is an important strategic principle, its application in locations which may be marginal/unviable for commercial activity should be informed by realistic assessment of the viability of the commercial components of housing led development. It has been noted that that in some of these locations blanket application of the mixed use principle has led to provision of premises which have not proved attractive to business tenants. This in turn has had environmental implications for local residents, and may have led to unjustified loss of business capacity and to sub-optimal provision of housing/ affordable housing and inappropriate design.

7.2 OFFICE AND RESIDENTIAL DEVELOPMENT: GENERAL ISSUES

7.2.1 The Plan's overarching office policy is cast positively and flexibly. In line with the NPPF[296], it encourages new provision and modernisation of offices as part of mixed use development to meet identified occupier demand. It also actively encourages the managed release of surplus office stock to other, viable land uses including housing (Policy 4.2). While this liberal approach is evidently crucial for meeting office requirements, the linkage to mixed use development has significant implications for other uses, especially housing. The Policy also highlights the different approaches to addressing office

295 CLG. National Planning Policy Framework (NPPF). CLG, 2012 para 17

296 CLG NPPF 2012 ibid paras 17, 18 – 22, 23, 51, 160 - 161

related mixed use development in central London and beyond.

POLICY 4.2 OFFICES

Strategic

A The Mayor will and boroughs and other stakeholders should:

a support the management and mixed use development and redevelopment of office provision to improve London's competitiveness and to address the wider objectives of this Plan, including enhancing its varied attractions for businesses of different types and sizes.

b recognise and address strategic as well as local differences in implementing this policy to:
- 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, and
- consolidate and extend the strengths of the diverse office markets elsewhere in the capital by promoting their competitive advantages, focusing new development on viable locations with good public transport, enhancing the business environment including through mixed use redevelopment, and supporting managed conversion of surplus capacity to more viable, complementary uses

c encourage renewal and modernisation of the existing office stock in viable locations to improve its quality and flexibility

d seek increases in the current stock where there is authoritative, strategic and local evidence of sustained demand for office-based activities in the context of Policies 2.7, 2.9, 2.13, 2.15–2.17.

LDF preparation

B LDFs should:

a enhance the environment and offer of London's office locations in terms of physical attractiveness, amenities, ancillary and supporting activities as well as services, accessibility, safety and security,

b provide the basis for work with the LDA, investors, developers, land owners and potential occupiers to bring forward and renew development capacity as efficiently as possible, co-ordinating their activities and interests to avoid planning delays and facilitating site assembly, if necessary, through the compulsory purchase process and especially beyond the central London office market,

c work with sub-regional partners to develop coordinated, phased strategies to manage long term, structural changes in the office market, focusing new capacity where there is strategic as well as local

evidence of demand, encouraging renewal and modernisation in viable locations and supporting changes of surplus office space to other uses

d examine the scope for re-use of otherwise surplus large office spaces for smaller units.

7.2.2 In view of the importance of the mixed use principle, Policy 4.3 deals in detail with its application in the different circumstances of central London and beyond.

POLICY 4.3 MIXED USE DEVELOPMENT AND OFFICES

Strategic

A

a Within the Central Activities Zone and the north of the Isle of Dogs Opportunity Area (see Chapter 2 and Annex 1), increases in office floorspace should provide for a mix of uses including housing, unless such a mix would demonstrably conflict with other policies in this plan

b Elsewhere in London, mixed use development and redevelopment should support consolidation and enhancements to the quality of the remaining office stock in the types of strategically specified locations identified in paragraph 4.11.

LDF preparation

B LDFs should:

a develop policies and strategies taking into account the above spatial principles

b develop local approaches to mixed use development and offices provision taking into account the contribution that 'land use swaps', 'housing credits' and off-site contributions can make, especially to sustain strategically important clusters of commercial activities such as those in the City of London and the north of the Isle of Dogs Opportunity Area. In Outer London, the consolidation of surplus office provision can provide opportunities to 'swap' new office provision to the most viable types of location outlined in paragraph 4.11.

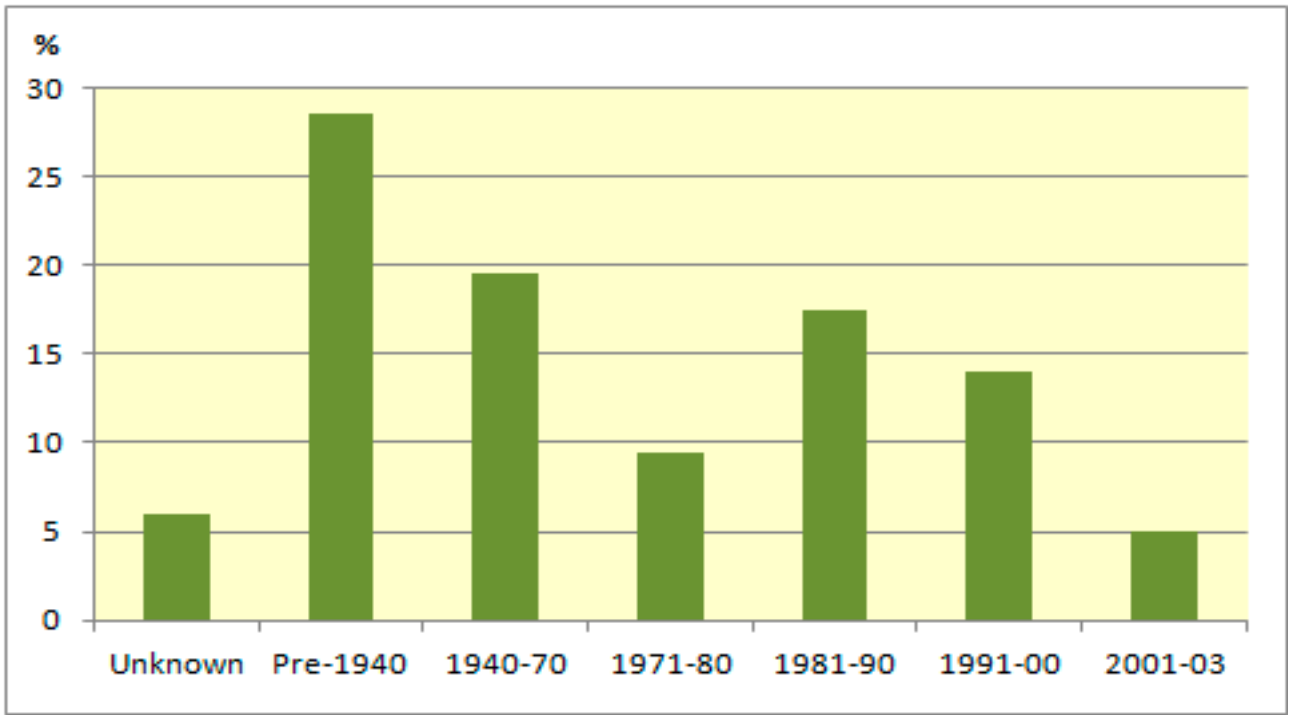
7.2.3 Recognising the dynamic nature of the office market, the Plan does not provide blanket protection for offices[297]. Instead, a 'plan, monitor and manage' approach is strongly encouraged 'to reconcile demand and supply over the development cycles likely to be encountered during the term of this plan'. This provides scope for changes from surplus office to other uses, especially housing, providing overall capacity is sustained to meet London's long term office needs' (paragraphs 4.10 – 4.17).

7.2.4 In the three years to 2012, changes from office to residential use have on average produced almost 4,000 completed units pa across London, and in April 2012 the

297 CLG NPPF 2012 ibid para 51

planning pipeline associated with such changes of use contained capacity for nearly 28,000 more units[298]. In all, these identified changes have or will lead to a loss of 1.7 mll sq m of surplus office floorspace. Hitherto most loss has taken place in areas with high residential values in and around CAZ and Canary Wharf. However, the changing nature of the office market beyond CAZ and Canary Wharf, and the age structure of the existing stock (see Figs7.1 and 7.2 below), suggests that there is considerable further potential for conversion there providing release of surplus stock is managed proactively (see para 7.3.4 below) in line with the London Plan and NPPF.

Fig 7.1 % London office stock by age 2005

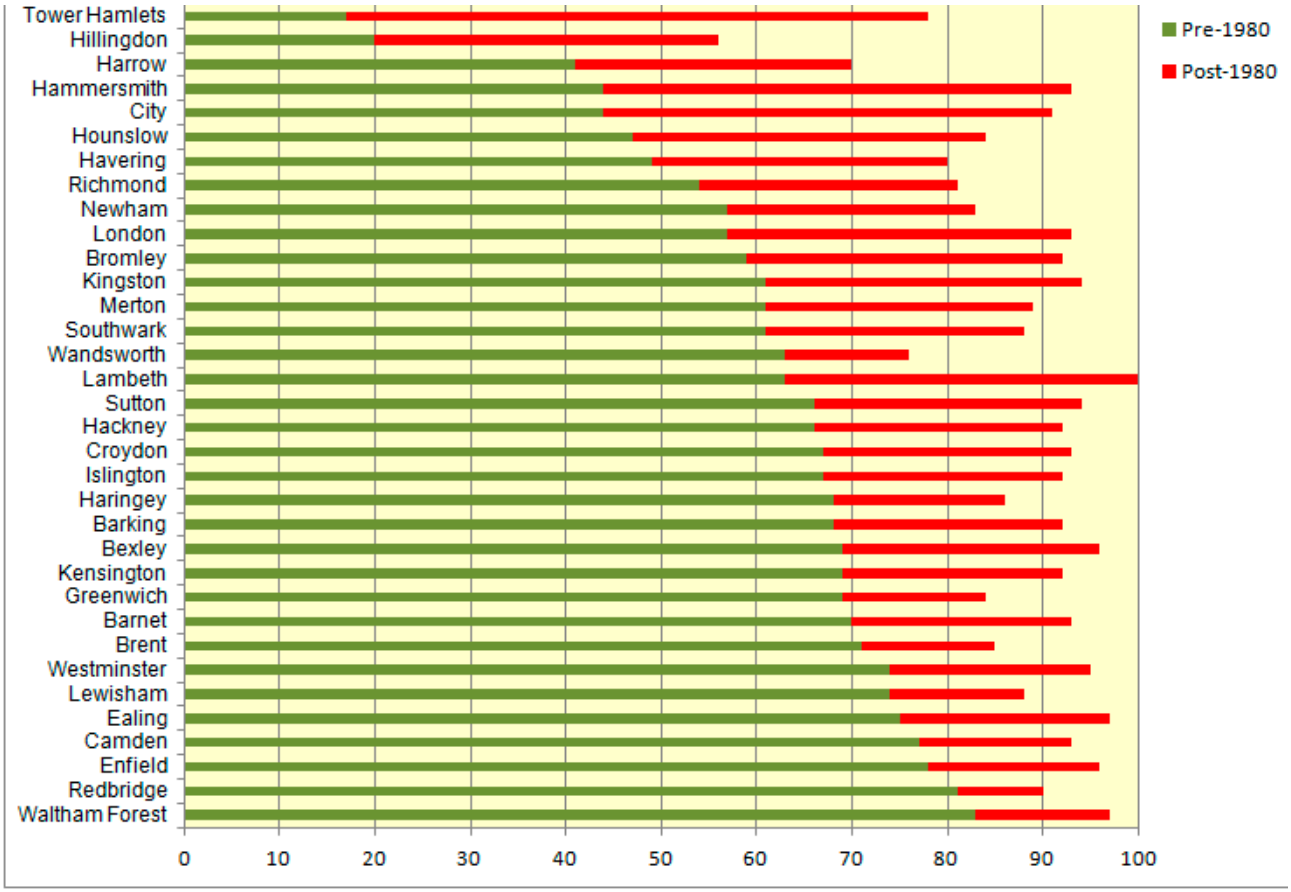


Source: London Office Policy Review - GLA 2012

298 Ramidus Consulting, Roger Tym & Partners. London Office Policy Review 2012. GLA, 2012

Fig 7.2 % Borough office stock by age 2005

(Note: data does not sum to 100% due to suppressed or unavailable information)



Source: London Office Policy Review - GLA 2012

7.2.5 While LP office policy is flexible, it is essential that its local implementation is properly evidence-based, planned and monitored to ensure adequate office capacity is maintained to sustain future economic growth. The Plan recognises that local approaches to office related mixed use development will vary to take account of the very different office markets which operate in central London and the rest of the capital (see below).

7.2.6 Conversion of surplus office buildings to residential can pose particular challenges, e.g. in terms of the physical configuration

7.2.7 of space or the relationship between flats and cores. Office conversions and surplus office site re-development must also be set in the context of the supply of local amenities, services and social and environmental infrastructure. In areas deficient in these and in light of occupier profiles, local plans should ensure that some of the development capacity represented by surplus offices addresses such needs. This may require sensitive planning and entail partnership action to facilitate comprehensive, or at least partial, area renewal.

7.2.8 The physical configuration of some surplus office buildings may make them unsuitable for the provision of on-site affordable housing for some client groups such as families, though this should not exclude them from affordable housing policy requirements (including off-site or cash in lieu contributions where this provides more appropriate housing than on site provision, consistent with guidance in Part 4 of this SPG).

7.2.9 There have been concerns that mixed use development can lead to over-development when the Plan's housing density matrix (rather than the full range of considerations on optimising residential development set out Part 1 of this SPG) is applied to a mixed use proposal without making allowances for proposed non-residential floorspace in vertically mixed schemes and/or without having full regard to local circumstances[299]. The Plan is clear that local context, public transport accessibility and the other design principles set out in policies 7.1 – 7.13 should also be key considerations.

299 See para 1.3.40 of this SPG for further detail.

7.3 HOUSING AND MIXED USE DEVELOPMENT BEYOND CENTRAL LONDON

Housing and offices

7.3.1 The office market beyond central London (CAZ and Canary Wharf/the north of the Isle of Dogs peninsula) is subject to a complex combination of factors which, over the long term, look likely to reduce strategically significant office investment across parts of the area. It is essential that the local expression of these is taken into account to effectively coordinate action to meet both housing and office needs.

7.3.2 Of particular importance are declining demand from historically important large scale occupiers, such as 'back offices' to serve CAZ businesses and central government or for commercial headquarters and administrative activities which sought a London - but not a central London - location. Against this decline must be set strategic and local initiatives to re-invent and re-brand some of these areas as attractive and competitive business locations, as well as to retain existing occupiers. In addition, account should be taken of population expansion which is likely to generate new demand for local business services requiring office space. Overall, locally based office employment beyond central London is projected to expand substantially[300] but its 'added value' may not be sufficient to prompt strategically significant new office development across the area – over the last economic cycle in outer London, new office development typically required

300 Thompson, R. Outer London: Issues for the London Plan. GLA, 2007 Mayor of London. The Mayor's Outer London Commission Report. GLA, 2010

a rent of more than £27 sq ft to be viable[301], and higher as yields went out ie significantly more than local occupiers are willing to pay for the substantial quantum of reasonable quality, second hand space. That being said, the 'value added' by some new employment may support some refurbishment of the existing stock to provide affordable business premises in viable locations[302].

7.3.3 A careful local balance will have to be struck to sustain viable existing provision; enable housing-led, mixed use office re-development to consolidate and modernise part of the office stock; and to realise the significant potential increment to housing capacity represented by genuinely surplus offices (Policy 2.7 Outer London – Economy). A downturn in the office market, accelerating release of surplus office capacity, coupled with opportunities for investment in affordable homes (see London Housing Strategy) may provide particular opportunities to facilitate this process of mixed use, largely town centre based, renewal[303].

7.3.4 To ensure the viability of existing office occupiers and investment is not compromised the process must be approached sensitively through local strategies tailored to local circumstances. Developing on LP principles for these strategies, boroughs should take into account the following approach informed by the Outer London Commission[304] and independent consultants[305]:

I) Recognise that unlike mixed use development in central London, which is mainly office-led, in other parts of the capital retail, leisure and, in particular, housing are usually higher value uses, and are likely to be the main drivers of change.

II) Depending on local and strategic circumstances (see vi below), the higher values associated with these uses may also provide scope for partial renewal of the office stock. This should be in line with the locational and other requirements of the Plan (see above), including coordinated conversion of surplus offices to residential (or to other uses) and, where appropriate given the background and priorities referred to above, drawing on the concept of land use 'swaps' to free up land for housing and to enable new office development to focus on the most viable locations (Policy 2.7).

III) Phasing of the office renewal/replacement process will be critical to ensure that the viability of existing office occupiers and investment is not compromised. Given the importance of managing change in the outer London economy, housing provision should generally be a consequence of economic objectives when developing office consolidation strategies.

IV) This phasing should take account of the capacity of the existing stock for interim renewal to accommodate office occupiers e.g. through sub division to accommodate small firms – this may delay residential led mixed use redevelopment of some sites.

V) Because much office space outside central London is in or around town centres, local initiatives to manage office capacity could usefully be integrated into wider town

301 Outer London Commission 201 ibid para 3.20
302 Kingston University, Ramidus Consulting. Understanding the Future of South London. Discussion Paper for OLC 27.9.11. SLP, 2011
303 See Mayor of London. Town Centres Supplementary Planning Guidance forthcoming for further detail
304 The Mayor's Outer London Commission. Report. GLA, 2010 paras 3.51 – 3.63
305 Ramidus et al 2012 ibid

centre strategies. Mixed use, housing-led, partial renewal of the office stock can help deliver the objectives of these strategies.

VI) Boroughs must take a broader than local perspective in analysing their office markets (and as the context for subsequently realising potential housing capacity). Office locations outside town centres should be considered (including their environmental as well as economic sustainability), as should trends in the overall office market beyond central London. Annex 2 of the Plan provides the strategic context for these local assessments, categorising significant individual town centre office locations beyond CAZ and Canary Wharf according to whether:

- speculative office development could be promoted on the most efficient and accessible sites in the context of wider schemes to enhance the environment and offer of the centre as a commercial location. This might entail some long-term net loss of overall office stock through change of use on less commercially attractive sites; or.
- some office provision could be promoted as part of wider residential or residential and retail/leisure mixed use development. This would be likely to entail long-term net loss of overall office stock, partial renewal on the more commercially attractive sites and managed change of use of provision on less attractive sites.

VII) In view of the changing nature of the office market beyond central London, borough analyses of their office markets (and their approach to housing led mixed use renewal) should be evidence-based and conducted in the context of the 'Plan, Monitor and Manage' approach proposed in LP paragraphs 4.11 and 4.13.

VIII) Strategically significant office renewal and new office development should be consolidated in the most competitive locations where a market can be developed for existing and new occupiers. In some, but not all of the different types of strategic locations identified in LP paragraph 4.12, mixed use development with a strong residential component could play an important part in the office renewal process. The types of strategic office location where this type of mixed use development/redevelopment could be appropriate include:

- strategic office centres (currently Croydon and Stratford but possibly elsewhere if justified by demand);
- town centre based office quarters (e.g. Ealing, Uxbridge, Romford);
- locally oriented, town centre based office provision, which can be consolidated effectively to meet local needs, or where necessary changed to other uses; and
- existing linear office developments such as the 'Golden Mile' (along the A40).

The other types of suburban office locations identified in the Plan which are likely to be less suitable for a mixed use, residential led approach are:

- mid-urban business parks such as that developed at Chiswick;
- conventional business parks beyond the urban area, such as those at Stockley Park and Bedfont Lakes, which should become more sustainable; and
- science parks ranging from urban incubator units to more spacious provision.

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

7.4 TOWN CENTRE RELATED HOUSING

7.4.1 There are over 1,200 town centres of different sizes in London, including 1000 neighbourhood and more local centres. In line with the NPPF[306], the London Plan anticipates that they will be the primary geographical focus for most of the 1.1.million new Londoners expected over the 20 years to 2026, and for much of the £72 billion growth in consumer expenditure projected for London between 2006 and 2031[307].

7.4.2 Accommodating these trends can be combined with addressing London's housing needs to drive substantial town centre based, mixed use development. This will capitalise on the accessibility of town centres, which underpins their capacity for higher density development. Housing can also complement other town centre activities - physically in terms of utilising air space above commercial uses, functionally in terms of adding to their vitality and viability and perceptually by strengthening the 'sense of place' and quality of life which they provide for local communities. In helping to 'lever' in capacity for community activity, higher density, relatively high value, town centre based housing will also help relieve pressure for inappropriately located out of centre commercial development.

306 CLG NPPF 2012 ibid para 23

307 Experian Business Strategies. Consumer Expenditure and Comparison Goods Retail Floorspace Need in London. GLA, 2009

POLICY 2.15 TOWN CENTRES

Strategic

A The Mayor will and boroughs and other stakeholder should coordinate the development of London's network of town centres in the context of Map 2.6 and Annex 2 so they provide:

a the main foci beyond the Central Activities Zone for commercial development and intensification including residential development

Planning decisions

B Development proposals in town centres should conform with policies 4.7 and 4.8 and:

b accommodate economic and/or housing growth through intensification and selective expansion in appropriate locations

Policy 2.7 | Outer London: Economy
Strategic

C The Mayor will and boroughs and other stakeholders should seek to address constraints and opportunities in the economic growth of outer London so that it can rise above its long term economic trends by:

f prioritising improvements to the business environment including safety and security measures; partnership-based approaches like business improvement districts; enhancing the vibrancy of town centres through higher density, retail, commercial and mixed use development including housing…..

h identifying and bringing forward capacity in and around town centres with good public transport accessibility to accommodate leisure, retail and civic needs and higher density housing, including use of the compulsory purchase process to assemble sites…..

7.4.3 As the main nodes on London's public transport network, Metropolitan, Major and, in a few instances, District centres (see LP Annex 2) typically have higher 'PTAL' scores (5-6) capable of sustaining housing densities up to 400 units per hectare depending on dwelling size. At these higher densities they can be particularly important in meeting the burgeoning needs of smaller households. Conversely, opportunities for play and other amenity spaces tend to be more constrained in town centres so a lower proportion of family homes may be appropriate in these locations. A combination of smaller homes and good public transport accessibility reduces the need for car parking provision and provides scope to minimise provision, further increasing housing capacity (Policy 6.13). Higher densities also enhance the viability of car sharing schemes. The Outer London Commission reports[308] that town centres **can** accommodate families but this will require adequate social and environmental infrastructure with a consequent reduction in development capacity.

7.4.4 The Outer London Commission and independent consultants[309] confirm that ready accessibility to facilities and

308 Outer London Commission. Second Report. GLA, 2012
309 Cambridge University, Three Dragons, Land Use Consultants. The role of the planning system in delivering housing choice for older Londoners. Final report for the GLA. GLA, 2012

particular scope for social interaction may make town centre and edge of centre locations attractive for specialist, higher density provision for some active, older Londoners, especially in light of the Mayor's new housing standards which will ensure good quality accommodation including private open space/balconies. Similarly, the Commission advises that access to facilities, including the night time economy, and to the public transport system, can make town centres attractive for high density, relatively affordable provision for students, especially if this is within 30 minutes travel time of their universities (see Part 3 of this SPG).

7.4.5 The changing dynamics of the London economy provide opportunities to secure housing in and around town centres, especially through mixed use re-development. Particularly important among these drivers of change are the growing demand for retail, leisure and social infrastructure facilities (see paragraph 7.4.1 above), consolidation of the office stock beyond central London (see paragraph 7.3.4 above), contraction in demand for out-moded retail uses, especially smaller units along secondary frontages or in airspace above low density commercial activities, and release of surplus industrial capacity (see section 7.5 of this SPG), especially smaller sites on town centre fringes. Structured release of surplus commercial capacity resonates closely with the NPPF requirement to support changes to housing "provided there are not strong economic reasons why such development would be inappropriate[310]".

7.4.6 A range of partners have explored how a design led approach to development in and around medium sized and smaller town centres[311] can increase housing capacity there. These studies outline design and development principles to secure high quality, high density development as well as providing illustrations of ways to balance the need for homes of different sizes. The Outer London Commission has extended this work by commissioning illustrations of best practice in the design of development of appropriate densities in different types of location including town centres[312].

7.4.7 In some circumstances, implementation of mixed use policy will require flexible application of affordable housing policy, providing this flexibility does not compromise achievement of the broad strategic objective to maximise provision. Higher density development of affordable, probably 'Intermediate' homes for smaller households will generally be most appropriate in town centres with higher PTALs, although this should not rule out some carefully designed provision for families particularly, probably, as Affordable Rent housing.

7.4.8 This flexible approach is especially applicable to some town centre based office locations (see paragraph 7.3.4 above). In these locations, increased housing may make a particular contribution to securing the wider range of town centre uses anticipated by LP policy 2.15 providing it does not compromise viable office clusters (see paragraph 7.3.4 above). This policy also supports preparation of local town centre strategies or plans to

310 CLG NPPF 2012 ibid paras 23, 51

311 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

312 Maccreanor Lavington, Emily Greeves Architects, Graham Harrington. Housing Density Study, GLA, 2012

coordinate development of housing as part of a vibrant mix of other town centre uses. This may require innovative approaches to land assembly and, if necessary, through the compulsory purchase process (LP Policies 2.7, 2.15).

7.4.9 Reconciling the competing needs of different town centre activities requires sensitive and imaginative planning to ensure that housing contributes to place making for the centre as a whole as well as addressing specific residential issues such as access and security/safety related design issues and night-time noise. To complement and sustain this, on-going town centre management can usefully take account of the needs of residents as well as commercial occupiers. The Mayor proposes to prepare an SPG on town centres which will address these issues more specifically.

7.5 HOUSING AND SURPLUS INDUSTRIAL LAND

7.5.1 Historically, surplus industrial land has been a key source of new housing capacity. By 2010 the total stock of industrial land (including wider related uses such as waste and utilities) had fallen to an estimated 7,400 ha hectares, a reduction of some 410 hectares since 2006 and 840 hectares since 2001[313]. London's manufacturing sector is projected to continue to contract and new industrial type activities are expected to make more effective use of existing industrial land, freeing up surplus industrial capacity for other uses, especially housing. However, in line with the NPPF[314] and LP Policies 2.17 and 4.4, it is essential that the process of industrial land release is managed sensitively so that provision is still made for essential industrial functions, especially logistics, waste and transport, emerging new sectors such as green industries and the myriad small industrial type firms which rely on the planning system to protect affordable business space.[315]

7.5.2 The Plan notes that "research suggests industrial land use change should be monitored against benchmarks based on an average, pan-London annual net release of 41 ha 2006 – 2026" and provides a map showing borough level groupings for transfer of industrial land to other uses mainly in East and parts of North London, with more restricted scope elsewhere. This release should be undertaken on a selective and carefully managed and monitored basis to address bona fide demand from other suitable occupiers, including transport, logistics and, in particular, waste. In line with the NPPF and still extant government

313 Mayor of London. Land for Industry and Housing Supplementary Planning Guidance. GLA, 2012
314 CLG NPPF 2012 ibid para 51
315 Kingston University, Ramidus Consulting 2011 op cit

POLICY 4.4 MANAGING INDUSTRIAL LAND AND PREMISES

Strategic

A The Mayor will work with boroughs and other partners to:….

a plan, monitor and manage release of surplus industrial land where this is compatible with a) above, so that it can contribute to strategic and local planning objectives, especially those to provide more housing, and, in appropriate locations, to provide social infrastructure and to contribute to town centre renewal.

LDF preparation

B LDFs should demonstrate how the borough stock of industrial land and premises in Strategic Industrial Locations (Policy 2.17), Locally Significant Industrial Sites and other industrial sites will be planned and managed in local circumstances in line with this strategic policy and the location strategy in Chapter 2, taking account of: ….

b the potential for surplus industrial land to help meet strategic and local requirements for a mix of other uses such as housing and, in appropriate locations, to provide social infrastructure and to contribute to town centre renewal.

guidance on employment land reviews[316], policies and decisions to retain business land, including that for industry, must be justified by realistic demand assessments.

7.5.3 The Mayor's Land for Industry and Transport SPG[317] updates the Plan's map categorising boroughs according to the general approach to be taken towards release of surplus industrial land including for housing (see Fig 7.3 below) and provides updated industrial land release monitoring benchmarks for individual boroughs. These are presented on a sub-regional basis in Fig 7.4 below.

316 Office of the Deputy Prime Minister. Employment Land Reviews: Guidance Note. ODPM, 2004

317 Mayor of London. Land for Industry and Transport SPG 2012 ibid suggests that the annual release benchmark should be reduced from 41 ha/pa to about 37 ha pa.

Fig 7.3. SPG borough groupings for transfer of industrial land with indicative borough industrial land release benchmarks 2011-2031

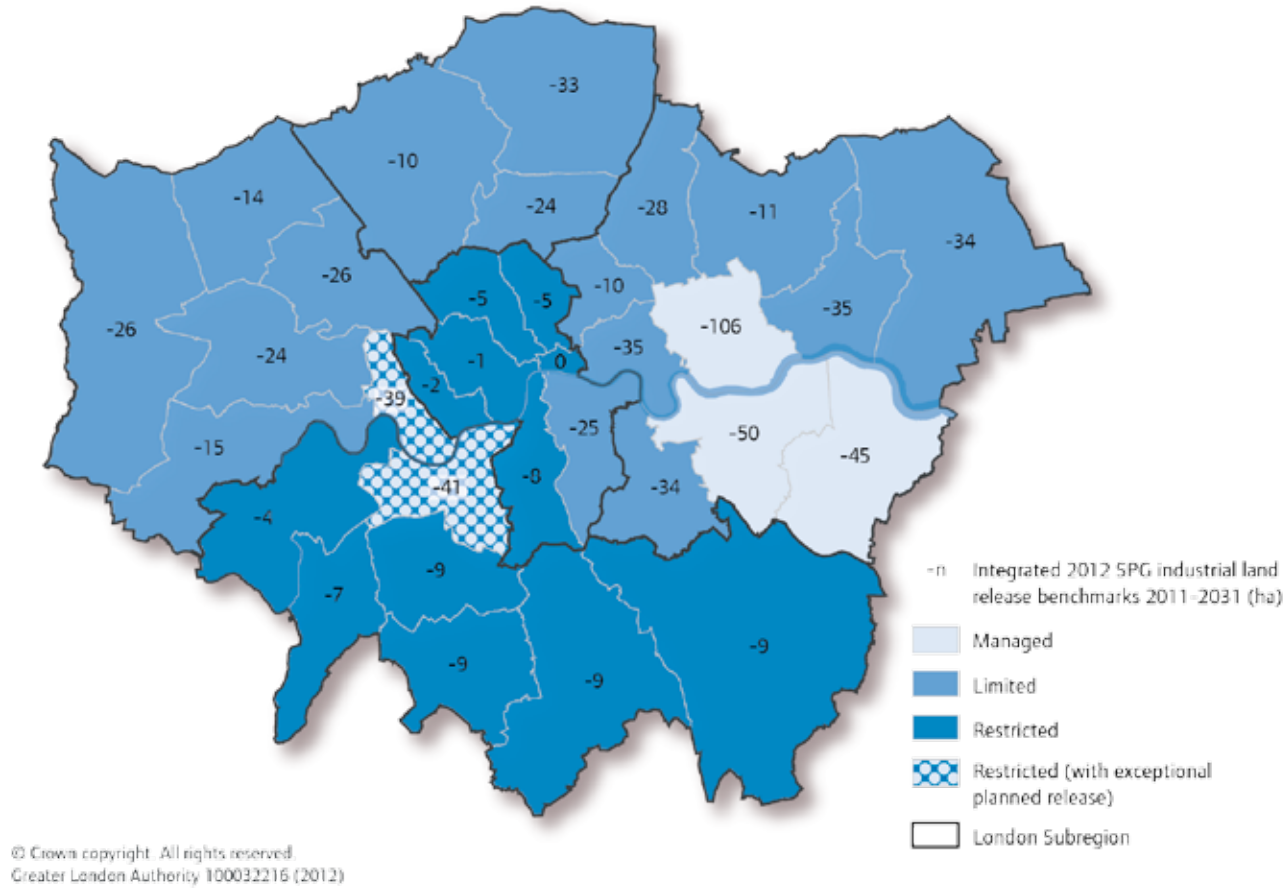


Fig 7.4 Sub Regional Industrial Land Release Benchmarks 2011 - 2031

2011 LP sub regions	Hectares per annum
Central	-2.3
East	-19.4
North	-3.4
South	-4.4
West	-7.2
Inner	-18.1
Outer	-18.6
London	**36.7**

Source: Land for Industry and Transport SPG, GLA 2012.

7.5.4 It is anticipated that, subject to assessment of demand and other criteria, beyond East London most industrial land releases to housing should come from smaller industrial sites. The main reservoir of industrial capacity will continue to be protected as Strategic Industrial Locations (SILs) and where formally designated, as Locally Significant Industrial Sites. Among SILs, especially in East London, there will still be some scope for strategically coordinated intensification, consolidation and reconfiguration which will yield capacity for other uses, especially housing and mixed use development. Where land is to be released from SILs, this should be managed through individual planning frameworks (Policy 2.13) and local plans. Smaller scale releases from SILs should not compromise the integrity and viability of the remainder of the SIL (Policy 2.17 C). 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 specific sites including smaller sites which are not categorised as being 'Locally Significant' or SILs.

7.6 HOUSING AND MIXED USE DEVELOPMENT IN CENTRAL LONDON

Housing and offices in central London

7.6.1 Policies 2.10 and 2.11 refine the Plan's general office and mixed use policies (7.2, 7.3 above) for application in the distinct circumstances of central London (the Central Activities Zone and the north of the Isle of Dogs Opportunity Area/ Canary Wharf). The LP makes clear that "Development in the CAZ should ensure that strategic and more local needs are met while not compromising the quality of CAZ's residential neighbourhoods or its distinctive heritage and environments. In particular, policies favouring mixed use development should be applied flexibly on a local basis so as not to compromise the CAZ's strategic functions, while sustaining the predominantly residential neighbourhoods in the area. This approach could be complemented by the use of housing 'swaps' or 'credits' between sites within, or beyond the CAZ' (LP paragraphs 2.45, 4.15).

POLICY 2.10 CENTRAL ACTIVITIES ZONE – STRATEGIC PRIORITIES

Strategic

A The Mayor will and boroughs and other relevant strategic partners should:

a enhance and promote the unique international, national and London wide roles of the Central Activities Zone (CAZ), supporting the distinct offer of the Zone based on a rich mix

of local as well as strategic uses and forming the globally iconic core of one of the world's most attractive and competitive business locations

b in appropriate quarters shown on Map 2.3, bring forward development capacity and supporting infrastructure and services to sustain and enhance the CAZ's varied strategic functions without compromising the attractions of residential neighbourhoods where more local uses predominate

.....

d in appropriate parts of the CAZ and the related area in the north of the Isle of Dogs ensure that development of office provision is not strategically constrained and that provision is made for a range of occupiers especially the strategically important financial and business services

Policy 2.11 Central Activities Zone – strategic functions
Strategic

A The Mayor will and boroughs and other relevant agencies should:

a ensure that developments proposals to increase office floorspace within CAZ and the north of the Isle of Dogs Opportunity Area include a mix of uses including housing, unless such a mix would demonstrably conflict with other policies in this plan (see Policies 3.4 and 4.3)

7.6.2 The unique concentration of development pressures in central London means that NPPF policy to promote mixed use development has a particular resonance there. Not only can it help enhance the environment and offer of this global business location, but it can also help address the demand for housing which such a concentration of businesses generates, and do so in a way which minimises the need to travel to work. 'London's economic growth depends heavily on an efficient labour market and this in turn requires adequate housing provision to sustain it'. To reconcile the competing demands for residential and commercial development in the CAZ a tailored approach to the implementation of mixed use policy is needed. This can be partly addressed through the concepts of land use 'swaps' and 'credits' which can support this process as part of local approaches to implementation of LP Policy 4.3 in differing circumstances and may be coordinated for application across borough boundaries to support the broader objectives of the Plan (LP paragraph 4.15). Lack of housing, especially affordable housing, is one of the key issues facing London employers.

7.6.3 The mixed use policy requires that in central London, housing and other uses should be provided on site or nearby to create mixed use neighbourhoods. The Plan makes clear that 'exceptions to this should only be permitted where mixed uses might compromise broader objectives, such as sustaining important clusters of business activity, for example in much of the City and the north of the Isle of Dogs, or where greater housing provision especially of affordable family housing, can be secured beyond this area. In such

circumstances, contributions to offsite housing provision should be secured as part of a planning agreement' (LP paragraph 4.17). Further examples of areas where local implementation of the mixed use policy may be inappropriate include the three corridors of currently low value, but potentially higher value future office capacity suggested in the draft City Fringe Opportunity Area Framework[318] as a long term strategic office reserve.

7.6.4 The Plan recognises the very varied functions and needs of different parts of central London and supports local approaches to implementation of strategic mixed use policy to address these (LP paragraph 4.15). Most CAZ boroughs use variants on two basic approaches to implementing this policy: towards the east of the area one based on tariffs, and towards the west one based on what was historically termed the '50:50' concept. Under the latter, a proportion e.g. 50%, of a nominal office proposal would be for residential developments and a proportion of this (historically 50% but now to be determined in light of LP policy – see Part 4 of this SPG on affordable housing), would be for affordable housing.

7.6.5 Accommodating a mix of uses on a site in the distinct and varied circumstances of central London requires different design solutions reflecting not only the size and character of a site and its setting but also other local objectives. In some, vertical separation of uses is appropriate and in others a horizontal arrangement, which may require innovative approaches to entrances and service provision.

7.6.6 The Plan notes that in some circumstances in relevant parts of CAZ the concepts of land use 'swaps' and 'credits' may also be of value in implementing mixed use policy and may result in the delivery of better planning outcomes. There will be cases, particularly within the CAZ where the offsite provision of housing may result in an improvement to the quality and quantity of housing and affordable housing being provided.

7.6.7 The Plan's glossary indicates that "typically, 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 used to satisfy the residential requirements of mixed use policies generated by future commercial development. Typically, an affordable housing credit is where new affordable housing is created when it is not a policy requirement. This affordable housing credit could potentially then be drawn down either for the purposes of affordable housing policy requirement and/or for the purposes of mixed use policy requirements for residential floorspace. Typically, 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 S.106 agreement or planning condition".

318 Mayor of London. Consultation Draft City Fringe Opportunity Area Planning Framework. GLA, 2009

7.7 OTHER HOUSING AND MIXED USE ISSUES IN CAZ

7.7.1 While primarily concerned with enhancing and promoting the unique international, national and metropolitan roles of CAZ, the headline policy for the Zone also recognises its importance as a place to live (Policy 2.10 A.b). CAZ is already home to 280,000 residents and by 2031 its population could rise by 18%[319]. Mixed use policy (see above) is complemented by specific new policy to address tensions between local and more strategic activities, especially those affecting predominately residential neighbourhoods (Policy 2.12).

POLICY 2.12 CENTRAL ACTIVITIES ZONE – PREDOMINANTLY LOCAL ACTIVITIES

Strategic

A The Mayor will and boroughs and other relevant agencies should:

a work together to identify, protect and enhance predominantly residential neighbourhoods within CAZ, and develop sensitive mixed use policies to ensure that housing does not compromise CAZ strategic functions elsewhere in the zone

b work with social infrastructure providers to meet the needs of both local residents and that generated by the large numbers of visitors and workers in CAZ.

7.7.2 CAZ has a unique housing market, accommodating some of the most prestigious homes in the world, as well as some of the types of housing and tenures found in other parts of the capital. Parts of CAZ are also distinct in terms of housing character; much is of relatively high density and a significant proportion, especially towards the west, is of a style which helps define central London perceptually. It is also very varied, sometimes clustered in well defined neighbourhoods and sometimes pepper potted among other uses. Some of the clusters are eighteenth and nineteenth century products of the 'great estates', while others are planned, modern re-developments of historic uses such as wharves.

7.7.3 What these dwellings have in common is their value – some are among the most expensive in the world, and on a like for like basis, most are considerably more so than their equivalents elsewhere in London. In planning terms, this creates both challenges and opportunities. While it means that providing affordable housing can be problematic, it also means that high value neighbourhoods have at least some resilience in the face of competition for scarce space from other high value added activities. Indeed in many parts of CAZ, housing can out-bid these other uses. It can also raise neighbourly tensions with them – the sorts of amenities valued by local residents are not always viewed in the same way by nearby businesses. While tensions between housing and night time activities in the densely developed environs of parts of the West End are well documented, there are also others, such as the potential impact on strategically

319 Mayor of London. Inner London: Context for the Draft Replacement London Plan. GLA, 2010

Scheme: Queensbridge Quarter, Credit: Hermine Sanson

important agglomerations of offices[320] of the day-lighting, over-looking and social infrastructure requirements of housing. Conversely, high value commercial uses which can be accommodated elsewhere in CAZ sometimes threaten its residential neighbourhoods.

7.7.4 It may be thought that such tensions could be resolved by simply defining 'predominantly residential neighbourhoods' on the CAZ diagram to guide implementation of Policy 2.12. This would, however, be a technically challenging exercise and something that could not be imposed through a top-down, one size fits all approach. There is no standard threshold which defines 'predominantly residential neighbourhoods' across CAZ. In some neighbourhoods a mix of uses may be appropriate, depending on their scale and nature, but in others not. The Mayor therefore proposes to work with the ten CAZ boroughs and other key stakeholders including Central London Forward to explore how these neighbourhoods might be defined to implement Policies 2.10 - 2.12 in the context of local circumstances for inclusion in the proposed CAZ Supplementary Planning Guidance.

7.7.5 Similarly, with ten boroughs coming together in the small area of CAZ, partnership working has already shown that there is value in taking a more coordinated approach to addressing its social infrastructure needs[321]. While the population density and 'churn' of CAZ does not appear to be quite as high as that of some other parts of inner London, it is very varied socially and ethnically and, uniquely, its employment density is substantially higher than elsewhere in London. These pressures generate distinct social infrastructure needs.

320 Quod Research. Relaxation of the Planning Rules for Change of Use from Business to Rresidential. Implications for the City of London. City of London Corporation, 2011

321 URS. Central London Infrastructure Study. Final Report, Westminster City Council, Central London Forward, 2009.

Scheme: Olympic Village Credit: London 2012

ANNEXES

ANNEX 1 SUMMARY OF THE QUALITY AND DESIGN STANDARDS

Design Standards		Classification	Source
1.0	Shaping Good Places		
1.1	**Defining places**		
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 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.	Baseline	LP Policy 7.4 and Building For Life
1.1.2	Development proposals should demonstrate: a. how the scheme complements the local network of public spaces, including how it integrates with existing streets and paths. b. how public spaces and pedestrian routes are designed to be overlooked and safe, and 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.	Baseline	LP Policy 7.5 (also 7.3, 5.10, 6.9 and 6.10) and Building for Life
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.	Baseline	LP Policy 2.18 and Building for Life

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.	Baseline	LP Policy 3.6 Building for Life
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; d. has suitable management arrangements in place.	Baseline	LP Policy 2.18 and Building for Life
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.	Baseline	LP Policy 3.4 and Building for Life
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.	Baseline	LP Policy 3.8 (also 3.10) and Building for Life
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.	Baseline	Building for Life
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 [Lifetime Homes Criterion 2].	Baseline	Lifetime Homes Criterion 2
3.1.3	The approach to all entrances should preferably be level or gently sloping [Lifetime Homes Criterion 3].	Baseline	Lifetime Homes Criterion 3

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 [Lifetime Homes Criterion 4].	Baseline	Lifetime Homes Criterion 4
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.	Good practice	Design for Homes/ Secured by Design
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. 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.	Baseline	Secured by Design
3.2.3	Where dwellings are accessed via an internal corridor, the corridor should receive natural light and adequate ventilation where possible.	Baseline	Design for London
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.	Baseline	Lifetime Homes guidance
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.	Good Practice	DD266

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.	Baseline	Design for London
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.	Baseline	Wheelchair Housing Design Guide
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 [Lifetime Homes Criterion 5].	Baseline	Lifetime Homes Criterion 5
3.3	**Car parking**		
3.3.1	Standard 3.3.1 (and Policy 6.13) - 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	Baseline	LP Policy 6.13
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. **	Baseline	DD266 and Wheelchair Housing Design Guide
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.	Baseline	Building for Life

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 [Lifetime Homes Criterion 1].	Baseline	Lifetime Homes Criterion 1
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	Baseline	LP Policy 6.9
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.	Baseline	Design for London
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.	Baseline	LP Policy 5.17 and Code for Sustainable Homes
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.	Baseline	LP Policy 5.17 and Code for Sustainable Homes
4.0	**Dwelling Space Standards**		
4.1	Internal floor area		

<table>
<tr><td>4.1.1</td><td>All developments should meet the following minimum space standards (as set out in Table 3.3 of the replacement LP):
<table>
<tr><th></th><th>Dwelling type (bedroom/ persons)</th><th>Essential GIA (sq.m)</th></tr>
<tr><td rowspan="9">Flats</td><td>1p</td><td>37</td></tr>
<tr><td>1b2p</td><td>50</td></tr>
<tr><td>2b3p</td><td>61</td></tr>
<tr><td>2b4p</td><td>70</td></tr>
<tr><td>3b4p</td><td>74</td></tr>
<tr><td>3b5p</td><td>86</td></tr>
<tr><td>3b6p</td><td>95</td></tr>
<tr><td>4b5p</td><td>90</td></tr>
<tr><td>4b6p</td><td>99</td></tr>
<tr><td rowspan="4">Two Storey Houses</td><td>2b4p</td><td>83</td></tr>
<tr><td>3b5p</td><td>96</td></tr>
<tr><td>4b5p</td><td>100</td></tr>
<tr><td>4b6p</td><td>107</td></tr>
<tr><td rowspan="3">Three Storey Houses</td><td>3b5p</td><td>102</td></tr>
<tr><td>4b5p</td><td>106</td></tr>
<tr><td>4b6p</td><td>113</td></tr>
</table>
For dwellings designed for more than 6 people, at least 10sq.m gross internal area should be added for each additional person.</td><td>Baseline</td><td>LP Policy 3.5 and proposed HCA standards</td></tr>
<tr><td>4.1.2</td><td>Dwelling plans should demonstrate that dwellings will accommodate the furniture, access and activity space requirements relating to the declared level of occupancy.</td><td>Baseline</td><td>HCA Housing Quality Indicator standards</td></tr>
<tr><td>4.2</td><td>Flexibility and adaptability</td><td></td><td></td></tr>
<tr><td>4.2.1</td><td>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.</td><td>Baseline</td><td>LP Policy 7.2</td></tr>
<tr><td>4.3</td><td>Circulation in the home</td><td></td><td></td></tr>
</table>

<table>
<tr><td>4.3.1</td><td>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:
<table><tr><th>Minimum clear opening width of doorway (mm)</th><th>Minimum width of hallway where door is in side wall (mm)</th></tr><tr><td>750</td><td>1200</td></tr><tr><td>775</td><td>1050</td></tr><tr><td>900</td><td>900</td></tr></table>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 [Lifetime Homes Criterion 6].</td><td>Baseline</td><td>Lifetime Homes Criterion 6</td></tr>
<tr><td>4.3.2</td><td>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 [Lifetime Homes Criterion 12].</td><td>Baseline</td><td>Lifetime Homes Criterion 12</td></tr>
<tr><td>4.4</td><td>Living / dining / kitchen</td><td></td><td></td></tr>
<tr><td>4.4.1</td><td>The following combined floor areas for living / kitchen / dining space should be met:
<table><tr><th>Designed level of occupancy</th><th>Minimum combined floor area of living, dining and kitchen spaces (sq.m)</th></tr><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></table></td><td>Good Practice</td><td>HATC</td></tr>
</table>

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.	Good Practice	Design for London
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.	Good Practice	Design for London
4.4.4	There should be space for turning a wheelchair in dining areas and living rooms and basic circulation space for wheelchairs elsewhere [Lifetime Homes Criterion 7].	Baseline	Lifetime Homes Criterion 7
4.4.5	A living room, living space or kitchen dining room should be at entrance level*** [Lifetime Homes Criterion 8].	Baseline	Lifetime Homes Criterion 8
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. [Lifetime Homes Criterion 15].	Baseline	Lifetime Homes Criterion 15
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.	Good Practice	Based on HCA Housing Quality Indicator standards
4.5.2	The minimum width of double and twin bedrooms should be 2.75m in most of the length of the room.	Good Practice	Design for London
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 [Lifetime Homes Criterion 9].	Baseline	Lifetime Homes Criterion 9
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 [Lifetime Homes Criterion 13].	Baseline	Lifetime Homes Criterion 13
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. **	Good Practice	HCA Housing Quality Indicator standards
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 ∞ [Lifetime Homes Criterion 10]. **	Baseline	Lifetime Homes Criterion 10
4.6.3	An accessible bathroom should be provided in every dwelling on the same storey as a main bedroom [Lifetime Homes Criterion 14]. **	Baseline	Lifetime Homes Criterion 14
4.6.4	Walls in bathrooms and WCs should be capable of taking adaptations such as handrails † [Lifetime Homes Criterion 11]. **	Baseline	Lifetime Homes Criterion 11
4.7	**Storage and utility**		
4.7.1	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. 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.	Baseline	HCA Housing Quality Indicator 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. The Code for Sustainable Homes guidance on working from home is recommended as a reference.	Baseline	Code for Sustainable Homes
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 [Lifetime Homes Criterion 16].	Baseline	Lifetime Homes Criterion 16

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.	Baseline	LP Policy 3.8
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.	Baseline	HCA Housing Quality Indicator standards
4.10.2	Private outdoor spaces should have level access from the home ǂ [Lifetime Homes Criterion 4].	Baseline	Based on Lifetime Homes
4.10.3	The minimum depth and width of all balconies and other private external spaces should be 1500mm.	Baseline	HCA Housing Quality Indicator standards
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.	Baseline	Secured by Design
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.	Baseline	LP Policy 3.5, PPG 24
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.	Baseline	LP Policy 7.15, PPG 24
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.	Baseline	Design for London
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.	Good Practice	Code for Sustainable Homes
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.	Good Practice	Code for Sustainable Homes
5.6	**Air quality (new standard ex LP EIP)**		
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).	Baseline	LP policy 7.14, Code for Sustainable Homes,
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.	Good Practice	Code for Sustainable Homes
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.	Baseline	LP Policy 5.3
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	Baseline	LP Policy 5.2
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.	Baseline	LP Policy 5.9
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.	Baseline	LP Policy 5.15
6.4.2	Where development is permitted in an area at risk of flooding, it should incorporate flood resilient design in accordance with PPS25.	Baseline	LP Policy 5.12
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.	Baseline	LP Policies 5.11 and 5.13
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.	Good Practice	Code for Sustainable Homes
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.	Baseline	Code for Sustainable Homes and LP 5.3
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.	Baseline	LP Policy 7.19

* In the Lifetime Homes Criteria a stair providing easy access is defined as one having maximum risers of 170mm, minimum goings of 250mm and a minimum width of 900mm measured 450mm above the pitch line.

** Refer to the GLA Best Practice Guidance on Wheelchair Accessible Housing for specific guidance on design standards for wheelchair accessible dwellings (summarised in Annex 2.2 of this SPG)

*** In the Lifetime Homes Criteria the entrance level of a dwelling is generally deemed to be the storey containing the main entrance door. Where there are no rooms on the storey containing the

main entrance door (e.g. flats over garages or shops and some duplexes and townhouses) the first storey level containing a habitable or non-habitable room can be considered the entrance level, if this storey is reached by a stair providing 'easy access', as defined above.

‡ Balconies and terraces over habitable rooms which require a step up to increase slab thickness / insulation are exempt from the Lifetime Homes level access standard.

∞ Dwellings over more than one storey with no more than two bedrooms may instead be designed with a Part M compliant WC at entrance level. The WC should provide a floor drain to allow for an accessible shower to be installed at a later date

† Adequate fixing and support for grab rails should be available at any location on all walls within a height band of 300mm - 1800mm from the floor.

ANNEX 2 BEST PRACTICE GUIDANCE FOR WHEELCHAIR ACCESSIBLE HOUSING

The London Plan seeks to address the current shortage of homes suitable for wheelchair users in London by requiring that ten per cent of all new housing is designed to be wheelchair accessible or easily adaptable for wheelchair users.

Inclusive Design - To reflect the principles of inclusive design homes for wheelchair users should look no different to adjacent homes and be part of not separate from the rest of the community. The base line and good practice standards in this SPG apply to wheelchair accessible homes. The external environment, pedestrian routes, public spaces and landscaping should also be wheelchair accessible to ensure that disabled and older people can visit the Lifetime Homes, use the communal areas and amenity spaces, and have a choice of wheelchair accessible homes to occupy.

Careful planning and generous space standards can occasionally allow the adaptation of a Lifetime Home[1] for use by some wheelchair users, but where homes are designed to the minimum space standards and where occupancy levels will remain the same, homes for wheelchair users need to be larger to provide accessible circulation, space for a variety of mobility equipment, adequate storage within reach in kitchens and bedrooms and to allow convenient and dignified use of bathrooms. The design of the home should be able to respond to individual needs and circumstances, and enable residents to participate as full members of the local community. Designers should plan for the life of the building not just initial occupants, and aim for built-in easy adaptability.

1 Lifetime Homes Design Guide Chris Goodman Habinteg Housing Association BRE Press 2011

Easily Adaptable - Detailed design standards and technical advice are contained in the Wheelchair Housing Design Guide[2] (WHDG). Boroughs should be able to advise on the number of homes that should be fully fitted out from the outset (this could include through-floor lifts, accessible kitchen units, level access showers and grab rails). Where the home is not to be fully fitted out or where the first occupants are unknown, the home should be designed to be easily adaptable for future occupation by a wheelchair user i.e. the home is designed from the outset with suitable accessibility, storage capacity, refuse storage, approach space to facilities and furniture, and circulation as defined by the WHDG, that enables later minor alterations to be easily undertaken to suit individual needs. Easily adaptable should not require structural alterations (such as removing walls to enlarge rooms) to make it suitable for wheelchair users, but might require minor alterations such as installing grab rails, replacing a bath with a shower or changing the kitchen units.

Choice of tenure - To ensure that disabled people have the same choice and opportunity as non disabled people, the 10% of wheelchair accessible homes should be distributed across all tenures, evenly distributed throughout the development providing the same choice in aspect and floor level as for any other resident, and cater for a range of household sizes, ages of residents and varying family needs.

Accessible Housing Register - Boroughs should be able to provide authoritative

2 Wheelchair Housing Design Guide Stephen Thorpe and Habinteg Housing Association 2006

evidence from their housing needs assessments on the need for wheelchair accessible homes. A number of boroughs have now committed to implementing the London Accessible Housing Register categories and are carrying out accessibility assessments of their housing stock so may be able to provide up to date advice about the demand for large or small accessible properties (see www.london.gov.uk/priorities/housing/housing-need/lahr).

Borough Standards - Where boroughs have their own wheelchair user housing standards that go beyond standards in this SPG, developers should comply with borough policy.

Marketing - Wheelchair accessible homes should be identified in the marketing arrangements to ensure that not only wheelchair users but the many older people who benefit from the flexible and adaptable homes created, are aware of these particular properties. Some boroughs ask for properties to be specifically marketed in the disability press and on accessible property web sites as well as in mainstream advertising.

Parking - The WHDG recommends that one parking bay is provided for every designated wheelchair accessible home. The Lifetime Homes Standards recommend that one blue badge parking bay is provided beside each residential block entrance or lift core in addition to those provided for the wheelchair accessible homes. Consideration should also be given to providing bays for disabled visitors. Design and access statement should demonstrate how this level of provision can be achieved. The provision of bays should however, be actively managed so that a decrease or increase in actual demand can be reasonably dealt with. If the full complement of designated bays are not all provided at first occupation, the parking management strategy (approved at planning application stage) should set out what mechanisms will be used to ensure additional provision can be provided quickly and easily. This may mean managing bays through leasing arrangements so that they can be assigned to Blue Badge holders as necessary reflecting actual demand.

Design Considerations - The following table and illustration provides a checklist of the key design considerations for wheelchair accessibility that are not already covered in the SPG's generic housing standards. Compliance with these features should be demonstrated in the Design and Access Statement submitted at planning application stage and clearly illustrated on dwelling plans for each type of designated wheelchair user home, to confirm that the dwellings can be easily and conveniently occupied by a wheelchair user and that equipment and adaptations can be easily undertaken to suit individual needs. Detailed features such as window catches, door handles, mechanical closers and openers, electrical fixtures and fittings etc should be addressed at later detailed design stages and fitted to suit individual needs, but the initial design of the home and communal areas should ensure that these features can be easily installed when needed.

Design Considerations for Wheelchair Accessible Housing

1. Moving around outside

Ensure a high degree of accessibility within the development.

Convenient access should be available throughout the development, connecting community facilities and public transport beyond the site to the site entrance, to all dwelling entrances and site facilities such as gardens, gyms, and play space[3]. Wheelchair accessible homes are best sited close to public transport, car parking, taxi drop-off, and to communal facilities.

Footpaths - Ensure that footpaths are smooth, slip resistant, at least 1200mm minimum wide with adequate space to negotiate obstacles, turn and pass (WHDG 1.2.1).

Gradients - Ensure that length to gradient ratios of footpaths and other routes do not exceed 2000mm at 1 in 12 and 5000mm at 1 in 15. Interpolation between these figures is acceptable. Where required, intermediate level landings should be at least 1200mm long (WHDG 1.2.3). Routes to entrances should not be steeper than 1 in 15 (WHDG 3.2.5).

Cross falls - Ensure that cross falls to paving do not exceed 1 in 50, whether paving is dedicated to pedestrian use or shared with vehicles (WHDG 1.2.4).

Crossings - Ensure that crossings have flush junctions or shallow gradients. Avoid gratings and channels that could trap wheels or footrests. (WHDG 1.2.5)

3 Inclusive Mobility. Department of Transport 2002

2. Using outdoor spaces

Ensure that spaces within the curtilage of the home are accessible, usable and secure.

Gardens - Provide an accessible route between the external door, external storage and external gate (WHDG 2.2.3). Where private back or side gardens are provided, ensure that gates have an 850mm clear opening and can be operated from each side (WHDG 2.2.1).

Balconies - Provide level access to balconies and useable space clear of any door swings (WHDG 2.2.2).

Refuse - Make suitable provision for refuse and recycling containers within a short distance of an external door, or ensure appropriate management provision (WHDG 2.2.4).

3. Approaching the home

Ensure ease of approach to the home by car, wheelchair or mobility scooter with cover at the point of transfer, and protection from the elements at the individual or common entrance.

The parking strategy, including the provision and dimensions of bays, the management of the supply and future demand for bays and how their use will be enforced should be made clear in the Design and Access Statement. Designers should refer to BS 8300: 2009 + A1:2010 for guidance about common areas of multi-storey developments, including circulation areas, doors, lifts and parking. Suitable designated parking spaces should be as close as possible to wheelchair accessible dwellings and ideally under cover.

Dwellings with a direct external entrance - Provide a parking space (ideally covered) for every wheelchair user dwelling (WHDG 3.2.1). Ensure that minimum clear dimensions are 3600mm wide x 5400mm long x 2200mm high and the parking area is paved with a slip resistant, smooth and level surface. (WHDG 3.2.2)

Dwellings with a communal external entrance - Where there is no direct external ground-floor entrance, ensure parking provision in the form of designated parking space for each wheelchair user dwelling, off-street or kerbside, nominally level that can enable transfer to and from vehicle (WHDG 3.2.3). Ensure a smooth, slip resistant route to dwelling entrances. Ramps, where unavoidable, are not steeper than 1 in 15 and not longer than 5000mm (WHDG 3.2.5).
Entrance landing - Provide a level landing 1500mm x 1500mm, 1800mm by 1800mm is preferred. Ensure a 1200mm depth clear of any door swing. Provide side protection where the ground level is below the path or landing level (WHDG 3.2.6).
Canopy at entrance - Provide a canopy of minimum dimensions 1200mm x 1500mm extending beyond the door on the lock side and at a maximum height of 2300mm (WHDG 3.2.7).
Lifts - Where wheelchair dwellings are above the ground floor, lifts should be as detailed in BS 8300: 2010 (internal car dimensions of 1100mm wide by 1400mm deep). A second lift should preferably be accessible to and from wheelchair user dwellings for use when the first or core lift is undergoing maintenance. (WHDG 3.2.9)

4. Negotiating the entrance door
Ensure that the clear opening, approach space and threshold are wheelchair accessible.
Door - Provide easy to use doors with, effective clear opening width of at least 800mm (WHDG 4.2.1). Designers should consider increasing this to 900mm or wider, particularly in relation to communal doors.
Approach space - Provide a minimum 200mm space beside the leading edge of the entrance door for a door opening away from the wheelchair user and 300mm for a door opening towards a wheelchair user, extending 1800mm from face of door (WHDG 4.2.2).
Threshold - Provide a weather tight accessible detail (i.e. a tapered or chamfered external profile) with a total upstand not exceeding 15mm. (WHDG 4.2.3)

5. Entering and leaving; dealing with callers
Ensure that the wheelchair user can:

- *enter the dwelling, manoeuvre an outdoor chair to allow transfer to an indoor chair, and reverse the process when leaving;*
- *leave the outdoor or indoor chair on charge;*
- *approach the entrance door to receive deliveries, retrieve post, open the door to visitors, manoeuvre, and return into living areas.*

Lobby - Where there is an entrance lobby or inner door, ensure there is adequate space to manoeuvre between doors (WHDG 5.2.5).
Turning space - Provide a turning space of 1800mm deep x 1500mm wide behind the closed door, clear of fittings and obstructions, and a 300mm clear space to the side of the leading edge of the door (WHDG 5.2.2).
Transfer space - Provide 1100mm deep x 1700mm wide space to transfer to a second wheelchair, to store the first clear of circulation routes and to approach furniture and doors (WHDG 5.2.1). The space should include an electrical socket to allow batteries to be recharged.

6. Negotiating the secondary door

Ensure a direct connection to external spaces by an easily operated, secure door, to provide access to private or shared gardens or balconies, and as an escape route in an emergency.

External landing - Provide a nominally level landing 1500mm wide x 1500mm deep with a 1200mm space clear of the door swing (WHDG 6.2.1).

Door - Provide effective clear width of 800mm to single or main leaf (WHDG 6.2.2).

Approach space - Ensure there is adequate space to approach, manoeuvre and pass through the door on line (WHDG 6.2.3).

Threshold - Provide weather-tight, accessible detail (WHDG 6.2.4).

7. Moving around inside; storing things

Ensure that wheelchair users can:

- *conveniently manoeuvre, approach and negotiate all doors within circulation areas*
- *approach and use storage off circulation areas.*

Open plan living room/kitchens can be more convenient because there are fewer doors to negotiate but designers should consider the noise from kitchen appliances. Radiators should not constrain circulation.

Straight passages - Ensure that passage widths or approaches, where no turning or door approach is required, are no less than 900mm wide clear of all obstructions except skirtings (WHDG 7.2.1).

Head-on approach to doors in passages - Ensure space beside latch edge of door, minimum 200mm on push side and minimum 300mm on pull side (WHDG 7.2.2).

Turning 90° - Ensure at right angles that passage width clear of all obstructions (except skirting) for the extent the turn is no less than 1200mm width in one direction, and 900mm in the other; or 900mm in each direction in combination with an angle splayed by 300mm (WHDG 7.2.5).

Turning 180° - Ensure that passage widths or approaches to turn through 180° are no less than 1500mm clear of all obstructions (except skirting) for extent of manoeuvring space. (WHDG 7.2.4)

Effective clear widths for doors - Ensure 775mm minimum effective clear width. Increase where approach is at an angle (WHDG 7.2.6). Effective clear width[4] of doors refers to the width between the face of the door or projecting fitting in the open position and the nearest point on the opposite frame or second door.

Doors at angles - Provide space to turn between doors at an angle to each other (At least 400mm from door to corner) (WHDG 7.2.8).

Sliding doors - Provide space beyond doorway at latch side for sideways approach and operation (300mm minimum) (WHDG 7.2.9).

Storage - Ensure that the depth and width of storage space, in combination with any shelving layout, provides optimum access to space and other stored items. Ensure that opening width of doors suits angled or head-on approach (WHDG 7.2.10).

4 See Lifetime Home standards for definition of effective clear widths

8. Moving between levels within the dwelling

Ensure that there is provision in dwellings on more than one floor for independent movement in a wheelchair between floors, without the need to transfer, without compromising circulation or living space, and with all the rooms remaining accessible.

Through the floor lift - Provide a soft pocket or structural opening of adequate size to enable the installation of a through-the-floor lift connecting a circulation space on the entrance level with a circulation space on the level of the main bedroom. The space could be used for easily removable storage until the lift is installed, provided enough storage is provided elsewhere.

Circulation - Provide adequate circulation space at each level to manoeuvre, call the lift, approach and open the lift door (WHDG 8.2.3).

9. Using living spaces

A room should accommodate the usual range of furniture with space for a wheelchair user to circulate and transfer from wheelchair to seat (see WHDG page 14 for basic criteria for space required for room layouts).

Room layout - Provide space for wheelchair users to approach furniture, circulate around it, transfer to seating and approach and operate doors, windows, equipment and controls (WHDG 9.2.1).

10. Using the kitchen

Ensure ease of approach to and use, from a wheelchair, of the sink, worktops, equipment, all appliances and controls and all storage essential to kitchen operations.

The kitchen should have sufficient space between the units to enable a wheelchair user to manoeuvre freely and safely. Position the hob, oven housing and sink on the same run of units uninterrupted by doors, windows or main circulation routes. Windows should be operable from a wheelchair. Accessible storage capacity should be retained following future changes to provide clear knee space underneath the sink, hob or oven housing.

Layout - Provide clear manoeuvring space not less than 1800mm x 1500mm (WHDG 10.2.1).

11. Using the bathroom

The design of the bathroom is key to enabling independence and dignity for disabled people. The ability to manage toileting and bathing functions without assistance is highly desirable. See WHDG section 11 for the spatial requirements of bathrooms.

Bathroom Layout - Ensure independent approach and safe transfer to and use of all fittings, including manoeuvring space clear of fittings and door swings (WHDG 11.2.4) with flexible or easily adapted services (WHDG 11.2.1).

Bath - Where provided select bath and taps position and detail to allow a range of transfers, access to and operation of taps (WHDG 11.2.7).

Level-access shower - Where installed, detail to be fully accessible comprising drained floor, reachable and usable controls and scope for suitable water containment or suitable enclosure (WHDG 11.2.6). A shower area 1200 x 1200mm is more convenient than an area 1000 by 1000mm. Under-floor

heating dries the floor quickly, improving safety.
WC - Provide space to approach WC head-on, obliquely or to make a side-transfer (11.2.5).
Supports - Ensure that walls and ceiling are adequate for adjustable height basins and subsequent fixing of hoists, seats, supports and other fittings to suit user (WHDG 11.2.10).
Access from bedroom - A full height knock-out panel allows for direct access from main bedroom to bathroom or to the en-suite bathroom and the installation of a ceiling-mounted hoist (WHDG 11.2.2).
Second WC - In dwellings of four or more persons, provide fully accessible second WC with basin. The side transfer space should be on opposite sides to provide both left and right-handed transfer options within the dwelling (WHDG 11.2.3).

12. Using bedrooms
Ensure that there is space in all bedrooms to accommodate the normal range of bedroom furniture and for a wheelchair user to enter approach and transfer to beds, approach and use other furniture and operate windows.
Layouts - Provide bedroom layouts to ensure access to both sides of beds in double bedrooms and outer side of beds in single bedrooms, access to other furniture and to window (WHDG 12.2.1 and page 14 for basic criteria for space required for room layouts).
Door - Make provision for connection between main bedroom and bathroom by means of full-height knock-out panel, a door with panel over in full-height frame or fully detailed door (WHDG 12.2.3).
Hoist - Make provision for future ceiling track hoist installation in main bedroom - strengthen ceiling to allow run into bathroom (WHDG 12.2.4).

13. Internal doors
All internal doors, including those to storage spaces, can be operated conveniently.
Construction - Ensure that door construction permits subsequent fixing of pull handles or other fittings to suit individual requirements (WHDG 13.2.1).

14. Windows
Ensure independent control of opening windows, passive and mechanical ventilation and a balance of daylight, views out, privacy and security. Where windows extend to floor level consider radiator location to ensure they do not reduce circulation space or restrict furniture location.
Approach - Ensure that a wheelchair user can approach each window to operate controls for opening and ventilation (WHDG 14.2.1).
Transoms - Avoid full-width transoms (horizontal divisions) between 800 and 1500mm high (WHDG 14.2.6).

15. Service Controls
Ensure wheelchair users can reach, control and read mains water stopcocks, gas and electricity mains switches and consumer units.

Power supply - Provide power supply to locations of potential future adaptations (WHDG 15.2.8) such as provision of through-floor lift, shower, entry phone (WHDG 5.2.4) and at communal and dwelling entrances (WHDG 4.2.5).

WHEELCHAIR ACCESSIBLE HOUSING

The Key Features of a Home for a Wheelchair User:

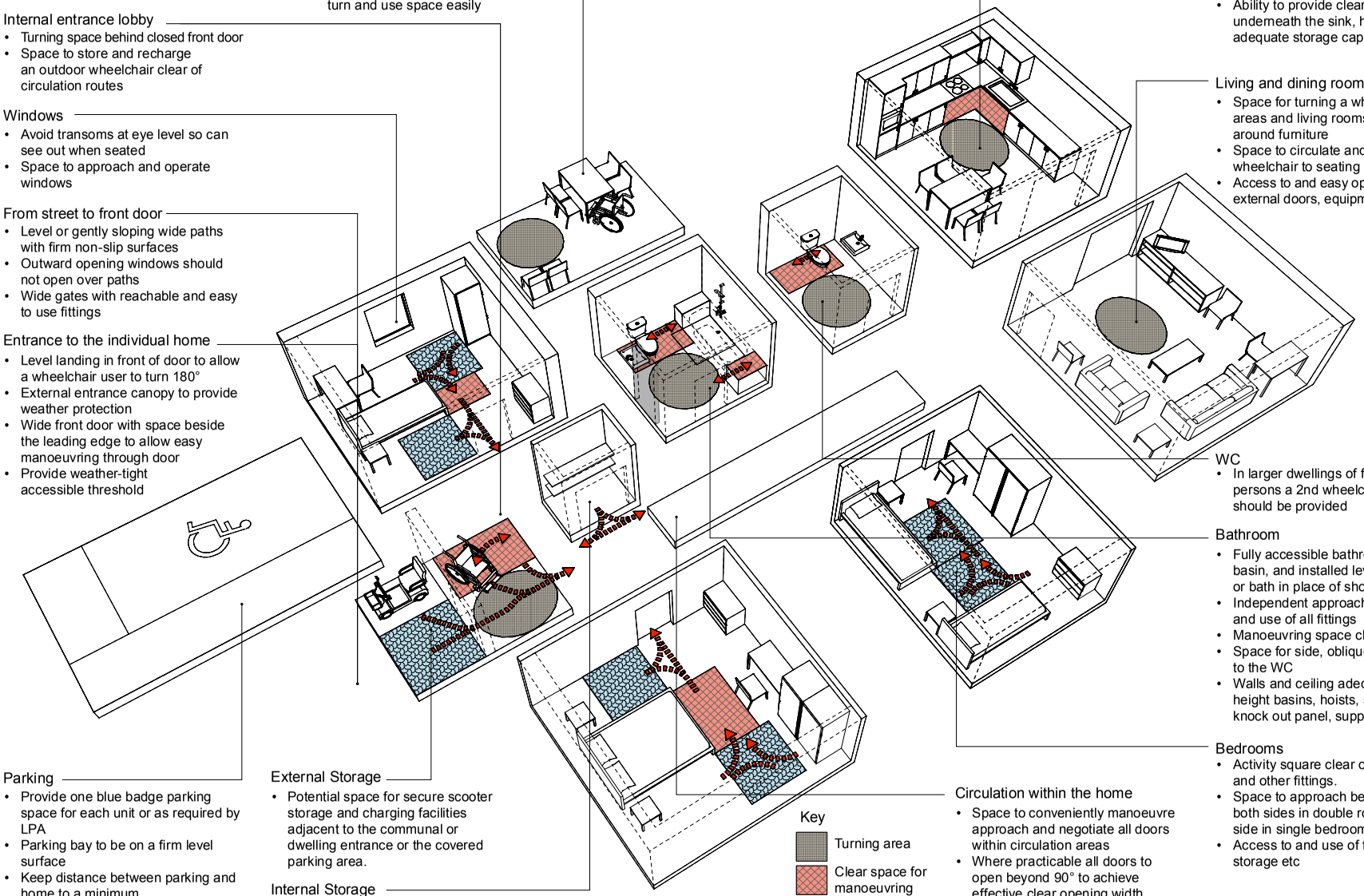
Outdoor amenity space
- Level access through to balconies, patios and gardens
- Space to get on and off the balcony, turn and use space easily

Internal entrance lobby
- Turning space behind closed front door
- Space to store and recharge an outdoor wheelchair clear of circulation routes

Windows
- Avoid transoms at eye level so can see out when seated
- Space to approach and operate windows

From street to front door
- Level or gently sloping wide paths with firm non-slip surfaces
- Outward opening windows should not open over paths
- Wide gates with reachable and easy to use fittings

Entrance to the individual home
- Level landing in front of door to allow a wheelchair user to turn 180°
- External entrance canopy to provide weather protection
- Wide front door with space beside the leading edge to allow easy manoeuvring through door
- Provide weather-tight accessible threshold



Kitchen
- Clear manoeuvring space with easy approach to sink, worktops, equipment, windows, appliances, controls and storage
- Ability to provide clear knee space underneath the sink, hob while retaining adequate storage capacity within reach

Living and dining room
- Space for turning a wheelchair in dining areas and living rooms and moving around furniture
- Space to circulate and transfer from wheelchair to seating
- Access to and easy operation of windows, external doors, equipment and controls

WC
- In larger dwellings of four or more persons a 2nd wheelchair accessible WC should be provided

Bathroom
- Fully accessible bathroom with WC, basin, and installed level-access shower or bath in place of shower
- Independent approach and transfer to and use of all fittings
- Manoeuvring space clear of fittings
- Space for side, oblique and front transfer to the WC
- Walls and ceiling adequate for adjustable height basins, hoists, seats, full height knock out panel, supports etc

Bedrooms
- Activity square clear of bed, door swings and other fittings.
- Space to approach bed and transfer on both sides in double rooms and on outer side in single bedrooms
- Access to and use of furniture, windows, storage etc

Parking
- Provide one blue badge parking space for each unit or as required by LPA
- Parking bay to be on a firm level surface
- Keep distance between parking and home to a minimum
- Route to home level or gently sloping

External Storage
- Potential space for secure scooter storage and charging facilities adjacent to the communal or dwelling entrance or the covered parking area.

Internal Storage
- Space to approach and use storage
- Additional storage capacity for aids and equipment

Circulation within the home
- Space to conveniently manoeuvre approach and negotiate all doors within circulation areas
- Where practicable all doors to open beyond 90° to achieve effective clear opening width without excessive door width
- Door construction to allow pull handles or other fittings to be installed

Diagram for 3 bedroom-5 person wheelchair accessible dwelling

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.

LP Table 6.2 "Maximum residential parking standards"

Number of beds	4 or more	3	1-2
Parking Spaces	2 – 1.5 per unit	1.5 – 1 per unit	Less than 1 per unit

A2 There is a widespread perception[1] 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 NPPF 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.

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 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".

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.

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

1 Outer London Commission 2012 ibid

closely by effectively 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 hands2". 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 processes3 – 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, 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, to manage parking demand. This can include using mechanisms such as reduced car parking standards and, in controlled parking zones, ineligibility for on-street

2 Outer London Commission 2012 ibid paras 4.15 - 16

3 Outer London Commission 2012 ibid

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' 4 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 controls5. 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 users[6]. Each designated wheelchair user dwelling should be allocated a designated parking space in line with Standard 3.3.2 and GLA Best Practice Guidance on wheelchair user housing. 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 revision[7]).

A13 The Mayor is considering an Alteration to the London Plan to secure a more effective balance and approach in addressing parking related issues.

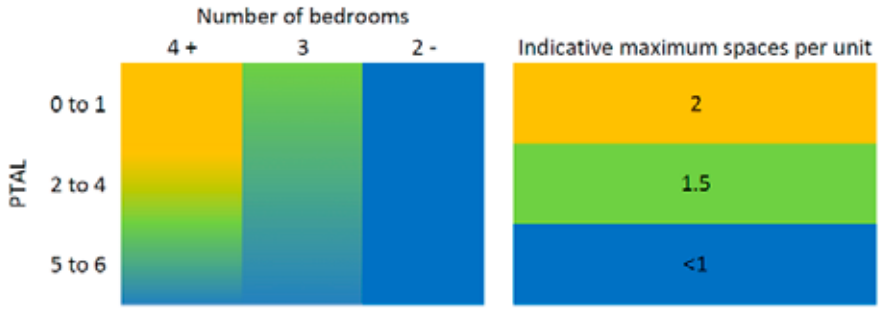
4 Urbed for Greater London Authority (GLA), the London Development Agency (LDA), the Association of London Government (ALG) and Transport for London (TfL). Tomorrow's Suburbs: London Plan toolkit. GLA, June 2006

5 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

6 Mayor of London LP 2011 ibid, Policy 3.8

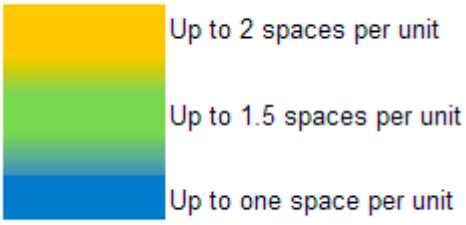
7 Mayor of London. Early Alterations to the London Plan. Spatial Development Strategy for Greater London. Affordable housing, cycle parking and minor clarifications. Proposals for consultation with the London Assembly and GLA Functional Bodies. GLA, 2011

Matrix 1



Matrix 2

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



ANNEX 4 - MINIMUM FLOORSPACE FOR ALL HOUSING TYPES

Minimum GIAs for unit mix and typologies up to 6b12p dwellings

Occupancy (persons)	No. of Beds	1 storey	2 storey	3 storey
1p(a)		37		
1p(b)		39		
2p	1	50	61	
3p	2	61	74	
4p	2	70	83	
	3	74	87	93
5p	3	86	96	102
	4	90	100	106
6p	3	95	105	111
	4	99	107	113
	5	103	113	119
7p	4	108	118	124
	5	112	122	128
	6	116	126	132
8p	4	117	127	133
	5	121	131	137
	6	125	135	141
	7	129	139	145
9p	5	130	140	146
	6	134	144	150
	7	138	148	154
10p	5	139	149	155
	6	143	153	159
	7	147	157	163
11p	6	152	162	168
	7	156	166	172
12p	6	161	171	177
	7	165	175	181

1p (a): 37 sq m (with shower room)
1p (b): 39 sq m (with bathroom)
Source: Developed by Levitt Bernstein Architects, Mae Architects, Emily Greeves Architects, HATC
For an extra en suite shower room add 3sq m; for an extra bathroom add 5 sq m

ANNEX 5 - OLDER PERSONS HOUSING DEMAND

Table 3.1 Annual potential demand for specialist older persons housing by borough and tenure 2011-2021 (high and low affordable housing supply scenarios)

	Shortfall/Surplus High Supply (pa)				Shortfall/Surplus Low supply (pa)			
	Sale	SO	Rent	All	Sale	SO	Rent	All
B&D	41	10	-42	9	41	10	16	67
Barnet	69	26	-78	18	69	26	14	110
Bexley	17	21	-69	-32	17	21	0	38
Brent	86	21	-14	94	86	21	47	154
Bromley	56	30	-121	-35	56	30	-10	76
Camden	42	8	-104	-54	42	8	-8	42
City	na	na	na	na	na	na	na	na
Croydon	85	29	-129	-15	85	29	-12	103
Ealing	101	23	-53	71	101	23	29	153
Enfield	55	23	-62	16	55	23	13	91
Greenwich	62	14	-60	16	62	14	29	105
Hackney	26	6	-74	-42	26	6	11	43
H&F	32	6	-103	-65	32	6	-13	26
Haringey	45	9	-156	-103	45	9	-45	9
Harrow	63	21	-51	32	63	21	5	88
Havering	57	22	-82	-3	57	22	-7	72
Hillingdon	82	20	-65	38	82	20	6	108
Hounslow	50	13	-31	32	50	13	27	90
Islington	20	5	-14	11	20	5	36	61
K&C	49	10	-8	51	49	10	55	114
Kingston	39	13	-83	-31	39	13	-20	32
Lambeth	44	9	-117	-64	44	9	-14	39
Lewisham	30	9	-41	-2	30	9	21	60
Merton	66	16	-23	60	66	16	20	103
Newham	40	7	-50	-4	40	7	16	62
Redbridge	21	20	-60	-19	21	20	5	47
Richmond	52	15	-23	44	52	15	19	86
Southwark	31	6	-18	19	31	6	51	87
Sutton	22	13	-78	-42	22	13	-8	28
Tower Hamlets	26	5	6	36	26	5	54	84
Waltham Forest	47	13	-41	19	47	13	22	81
Wandsworth	31	10	-130	-89	31	10	-25	17
Westminster	56	11	-77	-10	56	11	27	94
LONDON	**1541**	**465**	**-2051**	**-46**	**1541**	**465**	**361**	**2366**

Source: Cambridge et al 2012 ibid

ANNEX 6 - CARE HOME PLACE DEMAND

Total potential demand for care home places 2011- 2021 10% of persons aged 85 and over

Demand 10% of over 85s	care home beds 2009	need 2021	Shortfall/ Surplus		care home beds 2009	need 2021	Shortfall/ Surplus
Barking	303	518	215	Islington	303	394	91
Barnet	792	1081	289	K+C	109	441	332
Bexley	307	770	463	Kingston	493	494	1
Brent	480	972	492	Lambeth	564	514	-50
Bromley	669	1134	465	Lewisham	639	449	-190
Camden	120	640	520	Merton	519	658	139
Croydon	961	1128	167	Newham	309	461	152
Ealing	548	1026	478	Redbridge	492	771	279
Enfield	551	864	313	Richmond	366	602	236
Greenwich	463	790	327	Southwark	503	557	54
Hackney	12	454	442	Sutton	493	543	50
Hammersmith	172	398	226	Tower Hamlets	147	447	300
Haringey	99	400	301	Waltham Forest	87	616	529
Harrow	571	785	214	Wandsworth	659	486	-173
Havering	584	791	207	Westminster	99	703	604
Hillingdon	453	821	368	City of London	na	na	na
Hounslow	474	632	158	**LONDON**	**13341**	**21371**	**8030**

(Note: this is the consultants 'high scenario – text refers to mid point between high and low scenarios)

Source: Cambridge et al 2012 ibid

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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

Vietnamese

Nếu bạn muốn có văn bản tài liệu này bằng ngôn ngữ của mình, hãy liên hệ theo số điện thoại hoặc địa chỉ dưới đây.

Bengali

আপনি যদি আপনার ভাষায় এই দলিলের প্রতিলিপি (কপি) চান, তা হলে নীচের ফোন্ নম্বরে বা ঠিকানায় অনুগ্রহ করে যোগাযোগ করুন।

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.

Urdu

اگر آپ اِس دستاویز کی نقل اپنی زبان میں چاھتے ھیں، تو براہ کرم نیچے دئے گئے نمبر پر فون کریں یا دیئے گئے پتے پر رابطہ کریں

Turkish

Bu belgenin kendi dilinizde hazırlanmış bir nüshasını edinmek için, lütfen aşağıdaki telefon numarasını arayınız veya adrese başvurunuz.

Arabic

إذا أردت نسخة من هذه الوثيقة بلغتك، يرجى الاتصال برقم الهاتف أو مراسلة العنوان أدناه

Punjabi

ਜੇ ਤੁਹਾਨੂੰ ਇਸ ਦਸਤਾਵੇਜ਼ ਦੀ ਕਾਪੀ ਤੁਹਾਡੀ ਆਪਣੀ ਭਾਸ਼ਾ ਵਿਚ ਚਾਹੀਦੀ ਹੈ, ਤਾਂ ਹੇਠ ਲਿਖੇ ਨੰਬਰ 'ਤੇ ਫ਼ੋਨ ਕਰੋ ਜਾਂ ਹੇਠ ਲਿਖੇ ਪਤੇ 'ਤੇ ਰਾਬਤਾ ਕਰੋ:

Gujarati

જો તમને આ દસ્તાવેજની નકલ તમારી ભાષામાં જોઈતી હોય તો, કૃપા કરી આપેલ નંબર ઉપર ફોન કરો અથવા નીચેના સરનામે સંપર્ક સાધો.