

APPENDIX D

MAYOR OF LONDON

THE LONDON PLAN



THE SPATIAL DEVELOPMENT
STRATEGY FOR GREATER LONDON

MARCH 2021

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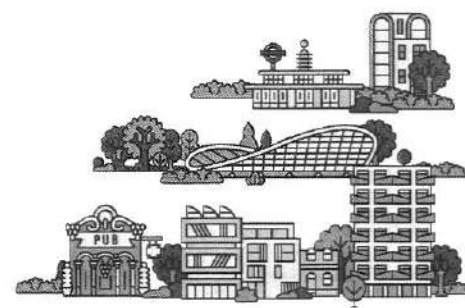
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Chapter 3

Design



Policy D1 London's form, character and capacity for growth

Defining an area's character to understand its capacity for growth

- A Boroughs should undertake area assessments to define the characteristics, qualities and value of different places within the plan area to develop an understanding of different areas' capacity for growth. Area assessments should cover the elements listed below:
- 1) demographic make-up and socio-economic data (such as Indices of Multiple Deprivation, health and wellbeing indicators, population density, employment data, educational qualifications, crime statistics)
 - 2) housing types and tenure
 - 3) urban form and structure (for example townscape, block pattern, urban grain, extent of frontages, building heights and density)
 - 4) existing and planned transport networks (particularly walking and cycling networks) and public transport connectivity
 - 5) air quality and noise levels
 - 6) open space networks, green infrastructure, and water bodies
 - 7) historical evolution and heritage assets (including an assessment of their significance and contribution to local character)
 - 8) topography and hydrology
 - 9) land availability
 - 10) existing and emerging Development Plan designations
 - 11) land uses
 - 12) views and landmarks.

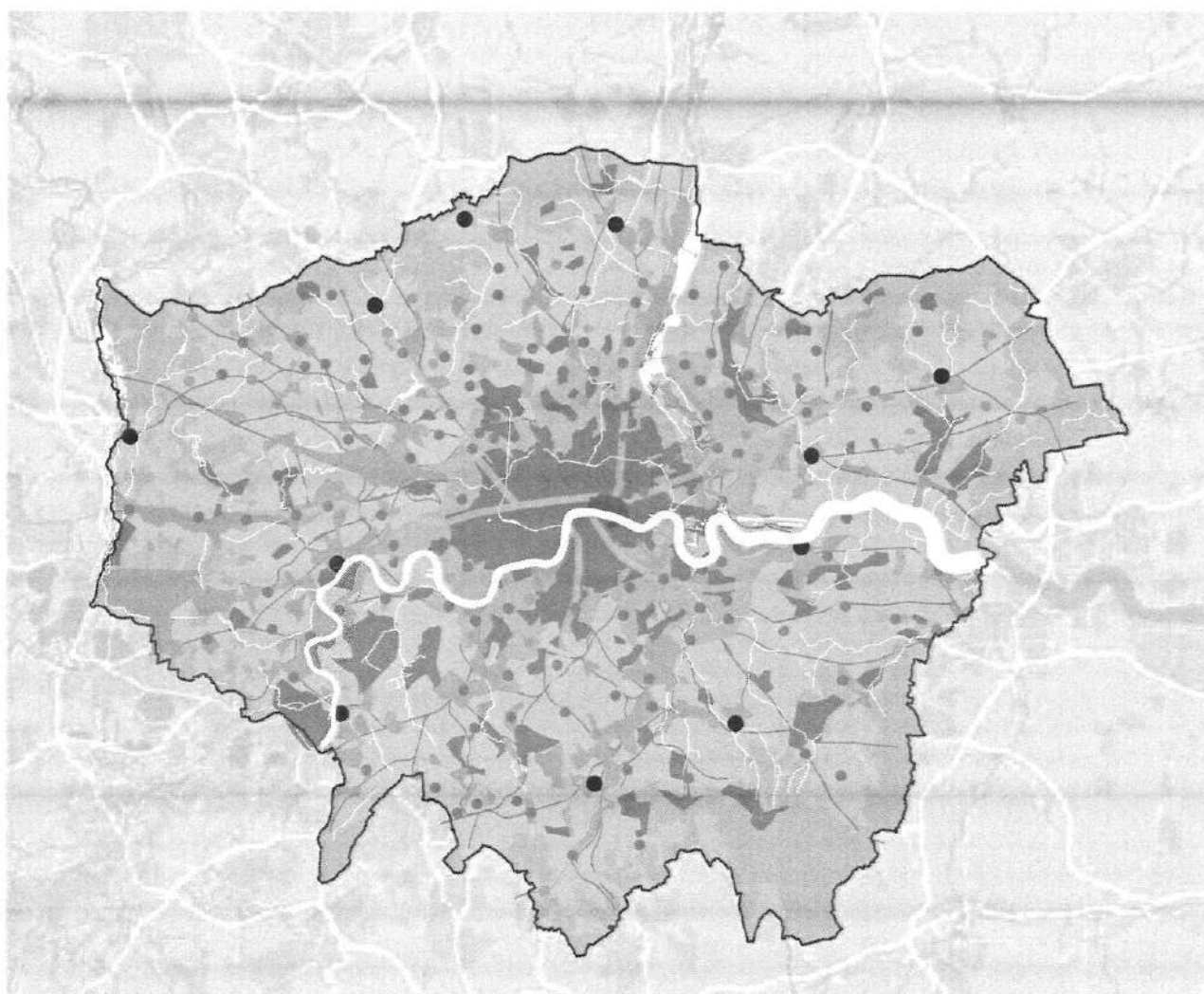
Planning for growth

- B In preparing Development Plans, boroughs should plan to meet borough-wide growth requirements, including their overall housing targets, by:
- 1) using the findings of area assessments (as required in Part A) to identify suitable locations for growth, and the potential scale of that growth (e.g. opportunities for extensive, moderate or limited growth) consistent with the spatial approach set out in this Plan; and

- 2) assessing the capacity of existing and planned physical, environmental and social infrastructure to support the required level of growth and, where necessary, improvements to infrastructure capacity should be planned in infrastructure delivery plans or programmes to support growth; and
- 3) following the design-led approach (set out in Policy D3 Optimising site capacity through the design-led approach) to establish optimised site capacities for site allocations. Boroughs are encouraged to set out acceptable building heights, scale, massing and indicative layouts for allocated sites, and, where appropriate, the amount of floorspace that should be provided for different land uses.

- 3.1.1 This Plan provides a policy framework for delivering Good Growth through good design. Part A of this policy sets out the requirements for assessing an area's characteristics and Part B sets out the steps for using this information to establish the capacity for growth of different areas and ensure that sites are developed to an optimum capacity that is responsive to the site's context and supporting infrastructure.
- 3.1.2 **Understanding the existing character and context** of individual areas is essential in determining how different places may best develop in the future. An evaluation of the current characteristics of a place, how its past social, cultural, physical and environmental influences have shaped it and what the potential opportunities are for it to change will help inform an understanding of an area's capacity for growth and is crucial for ensuring that growth and development is inclusive.
- 3.1.3 It is important to understand **how places are perceived, experienced and valued**. Those involved in commissioning or undertaking area assessments should consider how they can involve the widest range of people appropriate depending on the scope and purpose of the work.
- 3.1.4 **Area assessments** should be used to identify the areas that are appropriate for extensive, moderate, or limited growth to accommodate borough-wide growth requirements. This analysis should form the foundation of Development Plan preparation and area-based strategies. This process will be fundamental to inform decision making on how places should develop, speeding up the Development Plan process and bringing about better-quality development. It will also help speed up planning decision making by providing an easily accessible knowledge-base about an area that is integrated in Development Plan policies.

- 3.1.5 When identifying the growth potential of areas and sites the **sequential spatial approach to making the best use of land** set out in GG2 Parts A to C should be followed.
- 3.1.6 The process set out in this policy, of evidence gathering and establishing the location and scale of growth in an area, provides the opportunity to **engage and collaborate with the local community and other stakeholders** as part of the plan making process, enabling them to help shape their surroundings. The requirements of Parts A and B help to inform the identification of locations that may be suitable for tall buildings, see [Policy D9 Tall buildings](#).
- 3.1.7 As change is a fundamental characteristic of London, **respecting character and accommodating change** should not be seen as mutually exclusive. Understanding of the character of a place should not seek to preserve things in a static way but should ensure an appropriate balance is struck between existing fabric and any proposed change. Opportunities for change and transformation, through new building forms and typologies, should be informed by an understanding of a place's distinctive character, recognising that not all elements of a place are special and valued.
- 3.1.8 The Mayor will provide **supplementary planning guidance** to provide additional support for boroughs when implementing the policy. [Figure 3.1](#) illustrates the broad characteristics of London as derived from its historical development, which can be used to inform area-based strategies.

Figure 3.1 - Outline Character Map of London**Character Map of London**

- 20th century suburbs
- Victorian suburbs
- Victorian entrepreneurship
- Georgian planning and growth
- The Square Mile
- Green spaces
- Green belt
- Heathrow

Town Centres

- 20th century
- Industrial
- Railway town centre
- Historic
- Former medieval market town
- High road centre
- High roads

Copyright, Allies and Morrison Urban Practitioners, 2016. Mapping and research for Historic England: London's Local Character and Density.

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19th Century Industry

- Industry
- Infrastructure
- ⊗ Waterways

- 3.2.6 In order to support the Healthy Streets Approach, development proposals should take account of the existing and planned **connectivity of a site via public transport and active modes** to town centres, social infrastructure and other services and places of employment. Opportunities to improve these connections to support higher density development should be identified.

Policy D3 Optimising site capacity through the design-led approach

The design-led approach

- A All development must make the best use of land by following a design-led approach that optimises the capacity of sites, including site allocations. Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site's context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in [Policy D2 Infrastructure requirements for sustainable densities](#)), and that best delivers the requirements set out in Part D.
- B Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with [Policy D2 Infrastructure requirements for sustainable densities](#). Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. This could also include expanding Opportunity Area boundaries where appropriate.
- C In other areas, incremental densification should be actively encouraged by Boroughs to achieve a change in densities in the most appropriate way. This should be interpreted in the context of [Policy H2 Small sites](#).
- D Development proposals should:

Form and layout

- 1) enhance local context by delivering buildings and spaces that positively respond to local distinctiveness through their layout, orientation, scale, appearance and shape, with due regard to existing and emerging street hierarchy, building types, forms and proportions

- 2) encourage and facilitate active travel with convenient and inclusive pedestrian and cycling routes, crossing points, cycle parking, and legible entrances to buildings, that are aligned with peoples' movement patterns and desire lines in the area
- 3) be street-based with clearly defined public and private environments
- 4) facilitate efficient servicing and maintenance of buildings and the public realm, as well as deliveries, that minimise negative impacts on the environment, public realm and vulnerable road users

Experience

- 5) achieve safe, secure and inclusive environments
- 6) provide active frontages and positive reciprocal relationships between what happens inside the buildings and outside in the public realm to generate liveliness and interest
- 7) deliver appropriate outlook, privacy and amenity
- 8) provide conveniently located green and open spaces for social interaction, play, relaxation and physical activity
- 9) help prevent or mitigate the impacts of noise and poor air quality
- 10) achieve indoor and outdoor environments that are comfortable and inviting for people to use

Quality and character

- 11) respond to the existing character of a place by identifying the special and valued features and characteristics that are unique to the locality and respect, enhance and utilise the heritage assets and architectural features that contribute towards the local character
- 12) be of high quality, with architecture that pays attention to detail, and gives thorough consideration to the practicality of use, flexibility, safety and building lifespan through appropriate construction methods and the use of attractive, robust materials which weather and mature well
- 13) aim for high sustainability standards (with reference to the policies within London Plan Chapters 8 and 9) and take into account the principles of the circular economy

14) provide spaces and buildings that maximise opportunities for urban greening to create attractive resilient places that can also help the management of surface water.

E Where development parameters for allocated sites have been set out in a Development Plan, development proposals that do not accord with the site capacity in a site allocation can be refused for this reason.

- 3.3.1 For London to accommodate the growth identified in this Plan in an inclusive and responsible way every new development needs to make the most efficient use of land by optimising site capacity. This means ensuring the development's form is the most appropriate for the site and land uses meet identified needs. The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as gypsy and traveller pitches – is the optimum development for the site.
- 3.3.2 **A design-led approach** to optimising site capacity should be based on an evaluation of the site's attributes, its surrounding context and its capacity for growth to determine the appropriate form of development for that site.
- 3.3.3 The **area assessment** required by Part A of Policy D1 London's form, character and capacity for growth, coupled with an area's assessed capacity for growth as required by Part B of Policy D1 London's form, character and capacity for growth, will assist in understanding a site's context and determining what form of development is most appropriate for a site. Design options for the site should be assessed to ensure the proposed development best delivers the design outcomes in Part B of this policy.
- 3.3.4 Designating appropriate development capacities through site allocations enables boroughs to proactively optimise the capacity of strategic sites through a consultative design-led approach that allows for **meaningful engagement and collaboration** with local communities, organisations and businesses.
- 3.3.5 Developers should have regard to designated development capacities in allocated sites and ensure that the design-led approach to optimising capacity on unallocated sites is carefully applied when **formulating bids** for development sites. The sum paid for a development site is not a relevant consideration in determining acceptable densities and any overpayments cannot be recouped through compromised design or reduced planning obligations.
- 3.3.6 **Good design** and good planning are intrinsically linked. The form and character of London's buildings and spaces must be appropriate for their location, fit for purpose, respond to changing needs of Londoners, be inclusive, and make



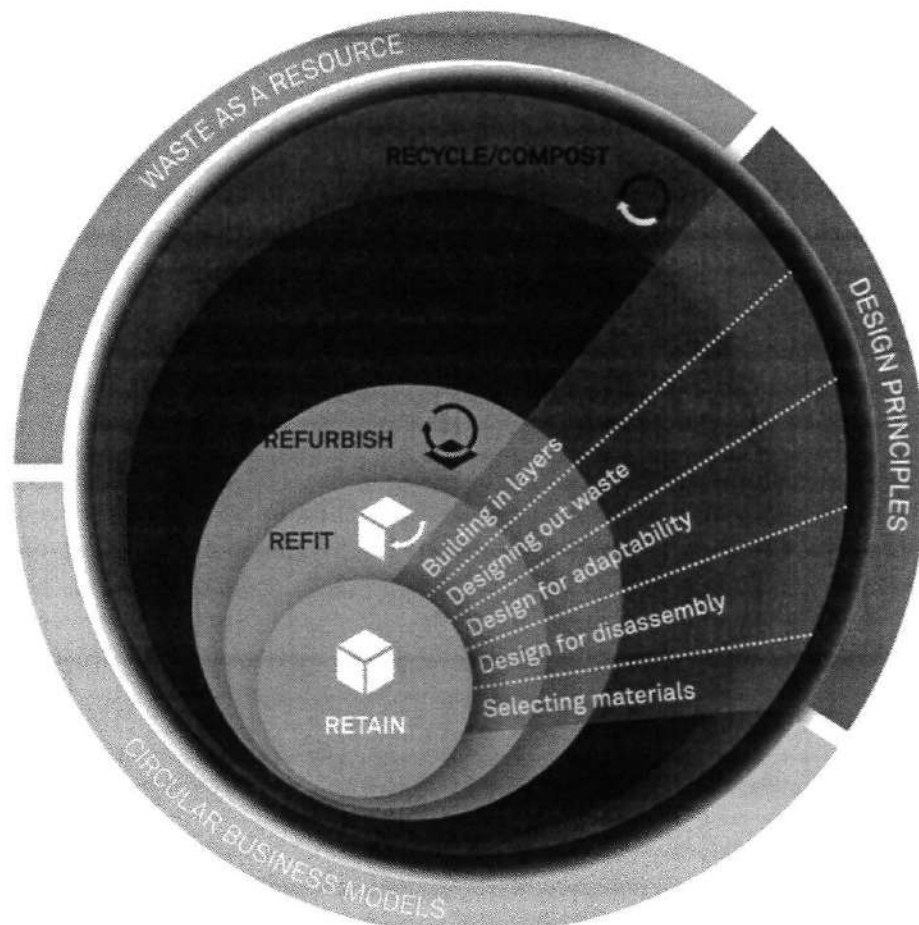
the best use the city's finite supply of land. The efficient use of land requires optimisation of density. This means coordinating the layout of the development with the form and scale of the buildings and the location of the different land uses, and facilitating convenient pedestrian connectivity to activities and services.

- 3.3.7 Developments that show a clear understanding of, and relationship with, the distinctive features of a place are more likely to be successful. These features include buildings, structures, open spaces, public realm and the underlying landscape. Development should be designed to respond to the **special characteristics** of these features which can include: predominant architectural styles and/or building materials; architectural rhythm; distribution of building forms and heights; and heritage, architectural or cultural value. The Mayor will provide further guidance on assessing and optimising site capacity through a design-led approach.
- 3.3.8 Buildings should be of high quality and enhance, activate and appropriately frame the **public realm**. Their massing, scale and layout should help make public spaces coherent and should complement the existing streetscape and surrounding area. Particular attention should be paid to the design of the parts of a building or public realm that people most frequently see or interact with in terms of its legibility, use, detailing, materials and location of entrances. Creating a comfortable pedestrian environment with regard to levels of sunlight, shade, wind, and shelter from precipitation is important.
- 3.3.9 Measures to design out exposure to poor air quality and noise from both external and internal sources should be integral to development proposals and be considered early in the design process. Characteristics that increase pollutant or noise levels, such as poorly-located emission sources, street canyons and noise sources should also be designed out wherever possible. Optimising site layout and building design can also reduce the risk of overheating as well as minimising carbon emissions by reducing energy demand.
- 3.3.10 To minimise the use of new materials, the following **circular economy principles** (see also Figure 3.2) should be taken into account at the start of the design process and, for referable applications or where a lower local threshold has been established, be set out in a Circular Economy Statement (see [Policy SI 7 Reducing waste and supporting the circular economy](#)):
- building in layers – ensuring that different parts of the building are accessible and can be maintained and replaced where necessary

- designing out waste – ensuring that waste reduction is planned in from project inception to completion, including consideration of standardised components, modular build and re-use of secondary products and materials
- designing for longevity
- designing for adaptability or flexibility
- designing for disassembly
- using systems, elements or materials that can be re-used and recycled.

- 3.3.11 Large-scale developments in particular present opportunities for innovative building design that avoids waste, supports high recycling rates and helps London transition to a circular economy, where materials, products and assets are kept at their highest value for as long as possible. Further guidance on the application of these principles through Circular Economy Statements will be provided.
- 3.3.12 Figure 3.2 shows a **hierarchy for building approaches** which maximises use of existing materials. Diminishing returns are gained by moving through the hierarchy outwards, working through refurbishment and re-use through to the least preferable option of recycling materials produced by the building or demolition process. The best use of the land needs to be taken into consideration when deciding whether to retain existing buildings in a development.
- 3.3.13 **Maximising urban greening** and creating green open spaces provides attractive places for Londoners to relax and play, and helps make the city more resilient to the effects of climate change. Landscaping and urban greening should be designed to ecologically enhance and, where possible, physically connect, existing parks and open spaces.
- 3.3.14 Measures to **design out crime** should be integral to development proposals and be considered early in the design process. Development should reduce opportunities for anti-social behaviour, criminal activities, and terrorism, and contribute to a sense of safety without being overbearing or intimidating. Developments should ensure good natural surveillance, clear sight lines, appropriate lighting, logical and well-used routes and a lack of potential hiding places.
- 3.3.15 Development should create **inclusive places** that meet the needs of all potential users.
- 3.3.16 The design and layout of development should reduce the dominance of cars and provide permeability to **support active travel** (public transport, walking and cycling), community interaction and economic vitality.

Figure 3.2 - Circular economy hierarchy for building approaches



Source: Building Revolutions (2016), David Cheshire, RIBA Publishing ©

- 3.3.17 New developments should be designed and managed so that **deliveries** can be received outside of peak hours and if necessary in the evening or night-time without causing unacceptable nuisance to residents. Appropriate facilities will be required to minimise additional freight trips arising from missed deliveries.
- 3.3.18 Shared and easily accessible **storage space** supporting separate collection of dry recyclables, food waste and other waste should be considered in the early design stages to help improve recycling rates, reduce smell, odour and vehicle movements, and improve street scene and community safety.
- 3.3.19 Buildings and spaces should be designed so that they can **adapt to changing uses** and demands now and in the future. Their lifespan and potential uses or requirements should be carefully considered, creating buildings and spaces

that are easy to maintain, and constructed of materials that are safe, robust and remain attractive over time.

- 3.3.20 **Masterplans and strategic frameworks** should be used when planning large-scale development to create welcoming and inclusive neighbourhoods, promote active travel, enable the successful integration of the built form within its surrounding area, and deliver wider benefits to residents, such as access to shared amenity space and high-quality public realm.

Monitoring density and site capacity

- 3.3.21 **Comparing density** between schemes using a single measure can be misleading as it is heavily dependent on the area included in the planning application site boundary as well as the size of residential units. Planning application boundaries are determined by the applicant. These boundaries may be drawn very close to the proposed buildings, missing out adjacent areas of open space, which results in a density which belies the real character of a scheme. Alternatively, the application boundary may include a large site area so that a tall building appears to be a relatively low-density scheme while its physical form is more akin to schemes with a much higher density.
- 3.3.22 To help assess, monitor and compare development proposals several measures of density are required to be provided by the applicant. Density measures related to the residential population will be relevant for infrastructure provision, while measures of density related to the built form and massing will inform its integration with the surrounding context. The following **measurements of density** should be provided for all planning applications that include new residential units:
1. number of units per hectare
 2. number of habitable rooms per hectare
 3. number of bedrooms per hectare
 4. number of bedspaces per hectare.
- 3.3.23 Measures relating to height and scale should be the maximum height of each building or major component in the development. Boroughs should report each of the required density measures provided by the applicant when they submit details of the development to the London Development Database. The following additional measurements should be provided for all major planning applications:
1. the Floor Area Ratio (total Gross External Area of all floors / site area)
 2. the Site Coverage Ratio (Gross External Area of ground floors /site area)
 3. the maximum height in metres above ground level of each building and at Above Ordinance Datum (above sea level).

Policy D4 Delivering good design

Design analysis and development certainty

- A Masterplans and design codes should be used to help bring forward development and ensure it delivers high quality design and place-making based on the requirements set out in Part B of Policy D3 Optimising site capacity through the design-led approach.
- B Where appropriate, visual, environmental and movement modelling/ assessments should be undertaken to analyse potential design options for an area, site or development proposal. These models, particularly 3D virtual reality and other interactive digital models, should, where possible, be used to inform plan-making and decision-taking, and to engage Londoners in the planning process.

Design scrutiny

- C Design and access statements submitted with development proposals should demonstrate that the proposal meets the design requirements of the London Plan.
- D The design of development proposals should be thoroughly scrutinised by borough planning, urban design, and conservation officers, utilising the analytical tools set out in Part B, local evidence, and expert advice where appropriate. In addition, boroughs and applicants should make use of the design review process to assess and inform design options early in the planning process. Development proposals referable to the Mayor must have undergone at least one design review early on in their preparation before a planning application is made, or demonstrate that they have undergone a local borough process of design scrutiny, based on the principles set out in Part E if they:
 - 1) include a residential component that exceeds 350 units per hectare; or
 - 2) propose a building defined as a tall building by the borough (see Policy D9 Tall buildings), or that is more than 30m in height where there is no local definition of a tall building.

- E The format of design reviews for any development should be agreed with the borough and comply with the Mayor's guidance on review principles, process and management, ensuring that:
- 1) design reviews are carried out transparently by independent experts in relevant disciplines
 - 2) design review comments are mindful of the wider policy context and focus on interpreting policy for the specific scheme
 - 3) where a scheme is reviewed more than once, subsequent design reviews reference and build on the recommendations of previous design reviews
 - 4) design review recommendations are appropriately recorded and communicated to officers and decision makers
 - 5) schemes show how they have considered and addressed the design review recommendations
 - 6) planning decisions demonstrate how design review has been addressed.

Maintaining design quality

- F The design quality of development should be retained through to completion by:
- 1) ensuring maximum detail appropriate for the design stage is provided to avoid the need for later design amendments and to ensure scheme quality is not adversely affected by later decisions on construction, materials, landscaping details or minor alterations to layout or form of the development
 - 2) ensuring the wording of the planning permission, and associated conditions and legal agreement, provide clarity regarding the quality of design
 - 3) avoiding deferring the assessment of the design quality of large elements of a development to the consideration of a planning condition or referred matter
 - 4) local planning authorities considering conditioning the ongoing involvement of the original design team to monitor the design quality of a development through to completion.

- 3.4.1 The processes and actions set out in the policy will help ensure development delivers good design. The responsibility for undertaking a particular process or action will depend on the nature of the development or plan; however, the outcome of this process must ensure the most efficient use of land is made so that the development on all sites is optimised.
- 3.4.2 Applicants will primarily be responsible for undertaking design analysis through the use of various **digital modelling techniques** as part of a wide range of design and presentation techniques. These techniques can also be used as part of the plan-making process to assess growth options and forms of development, as described in Part B of Policy D1 London's form, character and capacity for growth.
- 3.4.3 To enable the design of a proposed development to be fully assessed, applicants must provide the necessary **technical information** in an agreed format. The detail and nature of this should be commensurate with the scale of the development. All outline applications referred to the Mayor should be accompanied by thorough design codes, ensuring exemplary design standards are carried through the planning process to completion.
- 3.4.4 The **Mayor's Design Advocates (MDAs)** will play a key role in helping to deliver good design. They will help champion design across the GLA Group and beyond, through research, design review, capacity building, commissioning and advocacy. MDAs are also members of the London Review Panel, which the Mayor has set up to provide design scrutiny. This review panel is primarily focused on the review of Mayoral investments, but can provide design review sessions for development proposals referred to the Mayor where they have not previously been subject to review, or for schemes of particular significance.
- 3.4.5 All development proposals should be subject to a level of scrutiny appropriate to the scale and/or impact of the project. This **design scrutiny** should include work by planning case officers and ongoing and informal review by qualified urban design officers and conservation officers. Development proposals required to undergo design review as set out under Part D will form a small portion of overall planning applications in London. The Mayor may require that other referable developments undergo design review. Boroughs are encouraged to use design review to support their scrutiny of development proposals.
- 3.4.6 The Mayor has published a **London Quality Review Charter**, with accompanying guidance. The Charter promotes a consistent approach across London's design review sector and promotes transparency of process. The Charter builds on

the established 2013 guidance²⁷ which calls for reviews to be independent, expert, multidisciplinary, accountable, transparent, proportionate, timely, **advisory, objective and available**. The Charter includes guidance on how panels and processes should be managed and records kept. It also clarifies that the purpose of the design review process is not to dictate the design of a scheme or contradict planning policy, but to guide better design outcomes. More widely, the Mayor's Good Growth by Design Programme, is developing a support offer to London's boroughs and London's review sector, for example, offering advice to boroughs wishing to put in place a design review function.

- 3.4.7 The **scrutiny** of a proposed development's design should cover its layout, scale, height, density, land uses, materials, architectural treatment, detailing and landscaping. The design and access statement should explain the approach taken to these design issues (see also requirements of Policy D5 Inclusive design).
- 3.4.8 For **residential development** it is particularly important to scrutinise the qualitative aspects of the development design described in Policy D6 Housing quality and standards. The higher the density of a development the greater this scrutiny should be of the proposed built form, massing, site layout, external spaces, internal design and ongoing management. This is important because these elements of the development come under more pressure as the density increases. The housing minimum space standards set out in Policy D6 Housing quality and standards help ensure that as densities increase, quality of internal residential units is maintained.
- 3.4.9 **Higher density residential developments**²⁸ should demonstrate their on-going sustainability in terms of servicing, maintenance and management. Specifically, details should be provided of day-to-day servicing and deliveries, longer-term maintenance implications and the long-term affordability of running costs and service charges (by different types of occupiers).
- 3.4.10 It is important that **design quality is maintained throughout the development process** from the granting of planning permission to completion of a development. What happens to a design after planning consent can be instrumental to the success of a project and subsequent quality of a place. Changes to designs after the initial planning permission has been granted are

²⁷ Design Review Principles and Practice, The Design Council, et al, 2013, available at: https://www.designcouncil.org.uk/sites/default/files/asset/document/DC%20Cabe%20Design%20Review%2013_W_0.pdf

²⁸ Higher density residential developments are those with a density of at least 350 units per hectare

often allowable as minor amendments, or in the case of outline applications in the form of additional necessary detail. However, even minor changes can have a substantial effect on design quality, environmental quality and visual impact. The cumulative effect of amendments can often be significant and should be reviewed holistically. Sufficient design detail needs to be provided in approved drawings and other visual material, as well as in the wording of planning permissions to ensure clarity over what design has been approved, and to avoid future amendments and value engineering resulting in changes that would be detrimental to the design quality.

- 3.4.11 **Design codes** submitted with outline planning applications for large developments can be one such way to ensure that design quality is upheld throughout the planning process. Their main purpose is to describe the key design principles of a development proposal in a simple, concise and mainly graphical format, and they should draw on the proposal's layout, massing and heights to define the principal features that make up the overall design integrity of the scheme. Assessment of the design of large elements of a development, such as landscaping or building façades, should be undertaken as part of assessing the whole development and not deferred for consideration after planning permission has been granted.
- 3.4.12 Having a sufficient level of design information, including key construction details provided as part of the application, can help to ensure that the quality of design will be maintained if the permitted scheme is subject to subsequent minor amendments. However, it is also generally beneficial to the design quality of a completed development if the **architectural design team is involved in the development from start to finish**²⁹. Securing the design team's ongoing involvement can be achieved in a number of ways, such as through a condition of planning permission, as a design reviewer, or through an architect retention clause in a legal agreement.

²⁹

Shaping London: How can London deliver good growth?, Mayor's Design Advisory Group, 2016



Policy D5 Inclusive design

- A Boroughs, in preparing their Development Plans, should support the creation of inclusive neighbourhoods by embedding inclusive design, and collaborating with local communities in the development of planning policies that affect them.
- B Development proposal should achieve the highest standards of accessible and inclusive design. They should:
 - 1) be designed taking into account London's diverse population
 - 2) provide high quality people focused spaces that are designed to facilitate social interaction and inclusion
 - 3) be convenient and welcoming with no disabling barriers, providing independent access without additional undue effort, separation or special treatment
 - 4) be able to be entered, used and exited safely, easily and with dignity for all
 - 5) be designed to incorporate safe and dignified emergency evacuation for all building users. In all developments where lifts are installed, as a minimum at least one lift per core (or more subject to capacity assessments) should be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building.
- C Design and Access Statements, submitted as part of development proposals, should include an inclusive design statement.

- 3.5.1 The built environment includes the internal and external parts of buildings, as well as the spaces in between them. Despite recent progress in building a more accessible city, too many Londoners still experience barriers to living independent and dignified lives, due to the way the built environment has been designed and constructed or how it is managed. An **inclusive design approach** helps to ensure the diverse needs of all Londoners are integrated into Development Plans and proposals from the outset. This is essential to ensuring that the built environment is safe, accessible and convenient, and enables everyone to access the opportunities London has to offer.
- 3.5.2 **Inclusive design is indivisible from good design.** It is therefore essential to consider inclusive design and the development's contribution to the creation of inclusive neighbourhoods at the earliest possible stage in the development



process – from initial conception through to completion and, where relevant, the occupation and on-going management and maintenance of the development.

- 3.5.3 Inclusive design principles should be discussed with boroughs in advance of an application being submitted, to ensure that these principles are understood and incorporated into the original design concept. To demonstrate this, and to inform decision making, speed up the process and bring about better-quality development, an **inclusive design statement** is required as part of the Design and Access Statement. The inclusive design statement should:
- explain the design concept and illustrate how an inclusive design approach has been incorporated into this
 - detail what best practice standards and design guidance documents have been applied in terms of inclusive design
 - show that the potential impacts of the proposal on people and communities who share a protected characteristic and who will be affected by it have been considered
 - set out how access and inclusion will be maintained and managed, including fire evacuation procedures
 - detail engagement with relevant user groups, such as disabled or older people's organisations, or other equality groups.
- 3.5.4 The detail contained in the Design and Access Statements, including the inclusive design statement, should be proportionate to the scale and type of development.
- 3.5.5 The social factors that influence inclusion have a direct impact on well-being and are an important component in achieving more inclusive communities. Many factors that influence potential barriers to inclusion can be mitigated by **ensuring the involvement of local communities** in the planning policies and decisions that will affect them.
- 3.5.6 Inclusive design creates spaces and places that can facilitate social integration, enabling people to lead more interconnected lives. Development proposals should help to create **inclusive neighbourhoods** that cumulatively form a network in which people can live and work in a safe, healthy, supportive and inclusive environment. An inclusive neighbourhood approach will ensure that people are able to easily access services, facilities and amenities that are relevant to them and enable them to safely and easily move around by active travel modes through high-quality, people-focused spaces, while enjoying barrier-free access to surrounding areas and the wider city.

- 3.5.7 **Links to the wider neighbourhood** should be carefully considered, including networks of legible, logical, safe and navigable pedestrian routes, dropped kerbs and crossing points with associated tactile paving.
- 3.5.8 Where **security measures** are required in the external environment, the design and positioning of these should not adversely impact access and inclusion.
- 3.5.9 **Entrances** into buildings should be easily identifiable and should allow everyone to use them independently without additional effort, separation or special treatment. High and low level obstructions in buildings and in the public realm should be eliminated. The **internal environment** of developments should meet the highest standards in terms of access and inclusion, creating buildings which meet the needs of the existing and future population.
- 3.5.10 Buildings should be designed and built to accommodate robust **emergency evacuation** procedures for all building users, including those who require level access. All building users should be able to evacuate from a building with dignity and by as independent means as possible. Emergency carry down or carry up mechanical devices or similar interventions that rely on manual handling are not considered to be appropriate, for reasons of user dignity and independence. The installation of lifts which can be used for evacuation purposes (accompanied by a management plan) provide a dignified and more independent solution. The fire evacuation lifts and associated provisions should be appropriately designed, constructed and include the necessary controls suitable for the purposes intended. See also [Policy D12 Fire safety](#).
- 3.5.11 When dealing with **historic buildings and heritage assets**, careful consideration should be given to inclusive design at an early stage. This is essential to securing successful schemes that will enable as many people as possible to access and enjoy the historic environment now and in the future.
- 3.5.12 The Mayor will assist boroughs and other agencies in implementing an inclusive design approach by providing **further guidance** where necessary, continuing to contribute to the development of national technical standards and supporting training and professional development programmes. Further guidance on inclusive design standards can be found in the following British Standard documents:
- BS8300-1:2018 Design of an accessible and inclusive built environment. External environment. Code of practice. January 2018.
 - BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice. January 2018.

Policy D6 Housing quality and standards

- A Housing development should be of high quality design and provide adequately-sized rooms (see Table 3.1) with comfortable and functional layouts which are fit for purpose and meet the needs of Londoners without differentiating between tenures.
- B Qualitative aspects of a development are key to ensuring successful sustainable housing. Table 3.2 sets out key qualitative aspects which should be addressed in the design of housing developments.
- C Housing development should maximise the provision of dual aspect dwellings and normally avoid the provision of single aspect dwellings. A single aspect dwelling should only be provided where it is considered a more appropriate design solution to meet the requirements of Part B in Policy D3 Optimising site capacity through the design-led approach than a dual aspect dwelling, and it can be demonstrated that it will have adequate passive ventilation, daylight and privacy, and avoid overheating.
- D The design of development should provide sufficient daylight and sunlight to new and surrounding housing that is appropriate for its context, whilst avoiding overheating, minimising overshadowing and maximising the usability of outside amenity space.
- E Housing should be designed with adequate and easily accessible storage space that supports the separate collection of dry recyclables (for at least card, paper, mixed plastics, metals, glass) and food waste as well as residual waste.
- F Housing developments are required to meet the minimum standards below which apply to all tenures and all residential accommodation that is self-contained.

Private internal space

- 1) Dwellings must provide at least the gross internal floor area and built-in storage area set out in Table 3.1.
- 2) A dwelling with two or more bedspaces must have at least one double (or twin) bedroom that is at least 2.75m wide. Every other additional double (or twin) bedroom must be at least 2.55m wide.

- 3) A one bedspace single bedroom must have a floor area of at least 7.5 sq.m. and be at least 2.15m wide.
- 4) A two bedspace double (or twin) bedroom must have a floor area of at least 11.5 sq.m..
- 5) Any area with a headroom of less than 1.5m is not counted within the Gross Internal Area unless used solely for storage (If the area under the stairs is to be used for storage, assume a general floor area of 1 sq.m. within the Gross Internal Area).
- 6) Any other area that is used solely for storage and has a headroom of 0.9-1.5m (such as under eaves) can only be counted up to 50 per cent of its floor area, and any area lower than 0.9m is not counted at all.
- 7) A built-in wardrobe counts towards the Gross Internal Area and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. Any built-in area in excess of 0.72 sq.m. in a double bedroom and 0.36 sq.m. in a single bedroom counts towards the built-in storage requirement.
- 8) The minimum floor to ceiling height must be 2.5m for at least 75 per cent of the Gross Internal Area of each dwelling.

Private outside space

- 9) Where there are no higher local standards in the borough Development Plan Documents, 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, and it must achieve a minimum depth and width of 1.5m. This does not count towards the minimum Gross Internal Area space standards required in [Table 3.1](#)
- G The Mayor will produce guidance on the implementation of this policy for all housing tenures.

Table 3.1 - Minimum internal space standards for new dwellings[^]

Type of dwelling		Minimum gross internal floor areas* and storage (square metres)			
Number of bedrooms (b)	Number of bed spaces (persons(p))	1 storey dwellings	2 storey dwellings	3 storey dwellings	Built-in storage
1b	1p	39 (37) *	N/A	N/A	1
	2p	50	58	N/A	1.5
2b	3p	61	70	N/A	2
	4p	70	79	N/A	2
3b	4p	74	84	90	2.5
	5p	86	93	99	2.5
	6p	95	102	108	2.5
4b	5p	90	97	103	3
	6p	99	106	112	3
	7p	108	115	121	3
	8p	117	124	130	3
5b	6p	103	110	116	3.5
	7p	112	119	125	3.5
	8p	121	128	134	3.5
6b	7p	116	123	129	4
	8p	125	132	138	4

Notes to Table 3.1

Key

b: bedrooms

p: persons

[^] New dwelling in this context includes new build, conversions and change of use.

* Where a studio / one single bedroom one person dwelling has a shower room instead of a bathroom, the floor area may be reduced from 39 sq.m. to 37 sq.m., as shown bracketed.



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

Built-in storage areas are included within the overall GIA and include an allowance of 0.5 sq.m. for fixed services or equipment such as a hot water cylinder, boiler or heat exchanger.

GIAs for one storey dwellings include enough space for one bathroom and one additional WC (or shower room) in dwellings with five or more bedspaces. GIAs for two and three storey dwellings include enough space for one bathroom and one additional WC (or shower room). Additional sanitary facilities may be included without increasing the GIA, provided that all aspects of the space standard have been met.

- 3.6.1 Housing can be delivered in different physical forms depending on the context and site characteristics. Ensuring homes are of adequate size and fit for purpose is crucial in an increasingly dense city; therefore this Plan sets out **minimum space standards** for dwellings of different sizes in [Policy D6 Housing quality and standards](#) and [Table 3.1](#). This is based on the minimum gross internal floor area (GIA) relative to the number of occupants and takes into account commonly required furniture and the spaces needed for different activities and moving around. This means applicants should state the number of bedspaces/occupiers a home is designed to accommodate rather than simply the number of bedrooms. When designing homes for more than eight bedspaces, applicants should allow approximately 10 sq.m. per extra bedspace.
- 3.6.2 The space standards are minimums which applicants are encouraged to exceed. The **standards apply to all new self-contained dwellings** of any tenure, and consideration should be given to the elements that enable a home to become a comfortable place of retreat. The provision of additional services and spaces as part of a housing development, such as building management and communal amenity space, is not a justification for failing to deliver these minimum standards. Boroughs are, however, encouraged to resist dwellings with floor areas significantly above those set out in [Table 3.1](#) for the number of bedspaces they contain due to the level of housing need and the need to make efficient use of land.
- 3.6.3 To address the impacts of the urban heat island effect and the fact that the majority of housing developments in London are made up of flats, a **minimum ceiling height** of 2.5m for at least 75 per cent of the gross internal area is required so that new housing is of adequate quality, especially in terms of daylight penetration, ventilation and cooling, and sense of space. The height

of ceilings, doorways and other thresholds should support the creation of an inclusive environment and therefore be sufficiently high to not cause an obstruction. To allow for some essential equipment in the ceilings of kitchens and bathrooms, up to 25 per cent of the gross internal area of the dwelling can be lower than 2.5 m. However, any reduction in ceiling height below 2.5 m should be the minimum necessary for this equipment, and not cause an obstruction.

- 3.6.4 **Dual aspect dwellings** with opening windows on at least two sides have many inherent benefits. These include better daylight, a greater chance of direct sunlight for longer periods, natural cross-ventilation, a greater capacity to address overheating, pollution mitigation, 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.
- 3.6.5 **Single aspect dwellings** are more difficult to ventilate naturally and are more likely to overheat, and therefore should normally be avoided. Single aspect dwellings that are north facing, contain three or more bedrooms or are exposed to noise levels above which significant adverse effects on health and quality of life occur, should be avoided. The design of single aspect dwellings must demonstrate that all habitable rooms and the kitchen are provided with adequate passive ventilation, privacy and daylight, and that the orientation enhances amenity, including views. It must also demonstrate how they will avoid overheating without reliance on energy intensive mechanical cooling systems.
- 3.6.6 A variety of approaches to housing typologies and **layout of buildings** should be explored to make the best use of land and create high quality, comfortable and attractive homes. For example, increasing ceiling heights and having bay windows can optimise daylight and sunlight and allow buildings to be closer together than can otherwise be achieved.
- 3.6.7 Housing developments should be designed to **maximise tenure integration**, and affordable housing units should have the same external appearance as private housing. All entrances will need to be well integrated with the rest of the development and should be indistinguishable from each other.
- 3.6.8 Development should help create a more socially inclusive London. **Gated forms of development** that could realistically be provided as a public street are unacceptable and alternative means of security should be achieved through utilising the principles of good urban design and inclusive design (see [Policy D5 Inclusive design](#)).
- 3.6.9 **Private outside space** should be practical in terms of its shape and utility, and care should be taken to ensure the space offers good amenity. All dwellings should have level access to one or more of the following forms of private outside spaces: a garden, terrace, roof garden, courtyard garden or balcony. The use of

roof areas, including podiums, and courtyards for additional private or shared outside space is encouraged.

- 3.6.10 **Communal play space** should meet the requirements of [Policy S4 Play and informal recreation](#).

Table 3.2 - Qualitative design aspects to be addressed in housing developments

Layout, orientation and form	
i	The built form, massing and height of the development should be appropriate for the surrounding context, and it should be shown that alternative arrangements to accommodate the same number of units or bedspaces with a different relationship to the surrounding context have been explored early in the design process (making use of the measures in paragraph 3.3.23), particularly where a proposal is above the applicable density indicated in Part D of Policy D4 Delivering good design
ii	The layout of the scheme (including spaces between and around buildings) should: • form a coherent, legible and navigable pattern of streets and blocks • engender street based activity and provide a sense of safety • maximise active frontages onto public facing sides of a development, where appropriate wrapping around inactive frontages
iii	The site layout, orientation and design of individual dwellings and, where applicable, common spaces should: • provide privacy and adequate daylight for residents • be orientated to optimise opportunities for visual interest through a range of immediate and longer range views, with the views from individual dwellings considered at an early design stage • provide clear and convenient routes with a feeling of safety • help reduce noise from common areas to individual dwellings • help meet the challenges of a changing climate by ensuring homes are suitable for warmer summers and wetter winters

Outside space	
iv	Communal outside amenity spaces should: • provide sufficient space to meet the requirements of the number of residents • be designed to be easily accessed from all related dwellings • be located to be appreciated from the inside • be positioned to allow overlooking • be designed to support an appropriate balance of informal social activity and play opportunities for various age groups • meet the changing and diverse needs of different occupiers
v	Private amenity space for each dwelling should be usable and have a balance of openness and protection, appropriate for its outlook and orientation
Usability and ongoing maintenance	
vi	The development should ensure that: • the experience of arrival, via footpaths, entrances and shared circulation spaces is comfortable, accessible and fit for purpose • features are designed to allow maintenance activities such as window cleaning, to be undertaken with ease • sufficient levels of secure, covered and conveniently located externally accessible storage is provided for deliveries and other bulky items • recycling and waste disposal, storage and any on site management facilities are convenient in their operation and location, appropriately integrated, and designed to work effectively for residents, management and collection services*

* See also the London Waste and Recycling Board's Waste Management Planning Advice for New Flatted Properties 2014. <http://www.lwarb.gov.uk/what-we-do/resource-london/successes-to-date/efficiencies-programme-outputs/>

3.6.11 Other components of housing design are also important to improving the attractiveness of new homes as well as the Mayor's wider objectives to improve the quality of Londoners' environment. The Mayor intends to produce a single **guidance** document which clearly sets out the standards which need to be met in order to implement Policy D6 Housing quality and standards for all housing tenures, as well as wider qualitative aspects of housing developments. This will include guidance on daylight and sunlight standards. This will build on the guidance set out in the 2016 Housing SPG and the previous London Housing Design Guide.



Chapter 4

Housing



Policy H1 Increasing housing supply

- A Table 4.1 sets the ten-year targets for net housing completions that each local planning authority should plan for. Boroughs must include these targets in their Development Plan Documents.
- B To ensure that ten-year housing targets are achieved, boroughs should:
- 1) prepare delivery-focused Development Plans which:
 - a) allocate an appropriate range and number of sites that are suitable for residential and mixed-use development and intensification
 - b) encourage development on other appropriate windfall sites not identified in Development Plans through the Plan period, especially from the sources of supply listed in B2
 - c) enable the delivery of housing capacity identified in Opportunity Areas, working closely with the GLA.
 - 2) optimise the potential for housing delivery on all suitable and available brownfield sites through their Development Plans and planning decisions, especially the following sources of capacity:
 - a) sites with existing or planned public transport access levels (PTALs) 3-6 or which are located within 800m distance of a station³⁹ or town centre boundary⁴⁰
 - b) mixed-use redevelopment of car parks and low-density retail parks and supermarkets
 - c) housing intensification on other appropriate low-density sites in commercial, leisure and infrastructure uses
 - d) the redevelopment of surplus utilities and public sector owned sites
 - e) small sites (see Policy H2 Small sites)
 - f) industrial sites that have been identified through the processes set out in Policy E4 Land for industry, logistics and services to support

³⁹ Tube, rail, DLR and tram stations

⁴⁰ District, major, metropolitan and international town centres – for the purposes of Policy H1 Increasing housing supply Part B2a, the 800m distance is measured from the edge of the town centre boundary

London's economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Industrial intensification, co-location and substitution.

- 3) establish ambitious and achievable build-out rates at the planning stage, incentivising build-out milestones to help ensure that homes are built quickly and to reduce the likelihood of permissions being sought to sell land on at a higher value.

- C Boroughs should proactively use brownfield registers and permission in principle to increase planning certainty for those wishing to build new homes.
- D Boroughs should publish and annually update housing trajectories based on the targets in [Table 4.1](#) and should work with the Mayor to resolve any anticipated shortfalls.
- E Where new sustainable transport infrastructure is planned, boroughs should re-evaluate the appropriateness of land use designations and the potential to accommodate higher-density residential and mixed-use development, taking into account future public transport capacity and connectivity levels.
- F On sites that are allocated for residential and mixed-use development there is a general presumption against single use low-density retail and leisure parks. These developments should be designed to provide a mix of uses including housing on the same site in order to make the best use of land available for development.

- 4.1.1 The Mayor has carried out a London-wide Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA). The SHMA has identified **need for 66,000 additional homes per year**. The SHMA covers overall housing need as well as exploring specific requirements for purpose-built student accommodation and specialist older persons' accommodation within the overall figure.
- 4.1.2 For the purposes of the Plan, London is considered as a single housing market area, with a series of complex and interlinked sub-markets. The advantage of **strategic planning** is that it allows London to focus development in the most sustainable locations, allowing all of London's land use needs to be planned for with an understanding of how best to deliver them across the capital. Because of London's ability to plan strategically, boroughs are not required to carry out

their own housing needs assessment⁴¹ but must plan for, and seek to deliver, the housing targets in this Plan. These have been informed by the SHLAA and the SHMA.

- 4.1.3 The Mayor recognises that development of this scale will require not just an increase in the number of homes approved but also a fundamental transformation in how new homes are delivered. The London Plan, London Housing Strategy and Mayor's Transport Strategy together provide a framework to help achieve this ambition but achieving this step change in delivery will require increased levels of funding to support the delivery of housing and infrastructure, which is discussed in more detail in Chapter 11.
- 4.1.4 In particular, the **London Housing Strategy** sets out the Mayor's proposals for working with boroughs and other partners to deliver the step change in housing supply required, through:
- **proactive intervention in London's land market** to unlock and accelerate housing delivery, including on public land and through compulsory purchase and other forms of land assembly
 - **increased and better-targeted investment** to de-risk development and maximise opportunities from new transport infrastructure
 - **diversification of the housebuilding industry** through increased Build to Rent development, more support for small and medium-sized builders, and more supply from councils and housing associations
 - **tackling the construction skills gap** and modernising construction methods.
- 4.1.5 The London Housing Strategy encourages boroughs to put in place clear plans to bring forward appropriate sites in their own ownership for housing delivery. Boroughs should align these plans with their Development Plans in order to speed up housing delivery and ensure planning policy implications are fully considered.
- 4.1.6 Also set out in the London Housing Strategy, is the Mayor's aim to ensure that Londoners have an opportunity to purchase new homes before they are marketed overseas – particularly those homes that ordinary Londoners are more likely to be able to afford. The Mayor is discussing with major homebuilders steps to make more new homes available to Londoners before anyone else. The Mayor would keep any such steps under review to ensure that they deliver his

⁴¹ Where boroughs wish to commission their own research on housing requirements to complement the London-wide SHMA, they are encouraged to do this on a sub-regional rather than single-borough basis.

objectives. Their effectiveness will be monitored and the Mayor will consider other measures if necessary.

- 4.1.7 **The ten-year housing targets** in [Table 4.1](#) are based on the 2017 London SHLAA. This includes an assessment of large housing sites (0.25 hectares and above) undertaken in partnership with boroughs, which provides the most comprehensive study available of the capital's capacity for housing delivery based on a consistent pan-London methodology. In addition, the SHLAA includes an assessment of small site capacity using a combination of trend data for certain types of development and an estimate of potential for intensification in existing residential areas. The differences between borough housing targets are a reflection of the variations in the constraints and opportunities affecting development on large sites and the capacity for development on small sites.⁴² This includes: transport connectivity; the availability of large brownfield sites; scope to accommodate higher residential densities around town centres and stations; planning designations for industrial land, Green Belt, Metropolitan Open Land and other protected open spaces; environmental constraints; heritage assets; and the need to accommodate other land uses.
- 4.1.8 The SHLAA shows that there is **capacity** across London for approximately 40,000 new homes a year on large sites. Modelling in the SHLAA also shows that there is capacity for development on small sites for 12,000 new homes a year. The allowance for windfall sites (that are not specifically identified) is considered appropriate given the policy framework set out in the London Plan; the capital's reliance on recycled brownfield sites in other active land uses; and the number of additional homes expected to be provided via incremental intensification of existing residential areas. Boroughs should identify as many sites, including small sites, as possible via their Development Plan Documents. However, because of the nature of some sites (as set out above), including the particular incremental characteristics of small sites, boroughs are supported in using windfall assumptions in their five-year housing trajectories based on the numbers set out in [Table 4.2](#). This is because, in contrast with recent annual trends on small sites, the figures in [Table 4.2](#) are considered to better reflect a minimum baseline for housing delivery given the policy focus on developing small sites for housing in this Plan ([Policy H2 Small sites](#)) and the package of measures outlined in the London Housing Strategy.
- 4.1.9 There will inevitably be variations in housing completions from one year to the next, as well as a degree of uncertainty in the delivery and phasing of large sites. Therefore, the Mayor will monitor both housing

⁴²

For a full discussion of the SHLAA methodology and findings see 2017 SHLAA report.



completions and the net pipeline of approved homes when assessing progress towards delivering the London Plan housing targets (see [Chapter 12 - Monitoring](#)). The ten-year housing targets set out in [Table 4.1](#) should be monitored in net terms taking into account homes lost through demolition, amalgamations⁴³ or change of use.⁴⁴ Net non-self-contained accommodation for students should count towards meeting housing targets on the basis of a 2.5:1 ratio, with two and a half bedrooms/units being counted as a single home. Net non-self-contained accommodation for older people (C2 Use Class) should count towards meeting housing targets on the basis of a 1:1 ratio, with each bedroom being counted as a single home. All other net non-self-contained communal accommodation should count towards meeting housing targets on the basis of a 1.8:1 ratio, with one point eight bedrooms/units being counted as a single home. The approach to **monitoring net housing provision** from different forms of non-self-contained accommodation is based on the amount of self-contained housing this form of supply will free up. The ratios for student accommodation and other forms of communal accommodation mirror the ratios set out in the Government's Housing Delivery Test Measurement Rulebook.

- 4.1.10 The Mayor will work closely with boroughs on their **housing trajectories** and Development Plans to ensure these targets are planned for effectively, particularly where issues are identified in terms of completions and the development pipeline. In order to effectively contribute towards meeting London's housing needs, it is essential that all permitted homes are built out in a timely manner. Boroughs should encourage ambitious and achievable build-out milestones for all development proposals and consider using tools such as viability reviews (see [Policy H5 Threshold approach to applications](#)). The increase in housing delivery required by these targets may be achieved gradually and boroughs are encouraged to set out a realistic and, where appropriate, stepped housing delivery target over a ten-year period. This should be supported by a clear articulation of how these homes will be delivered and any actions the boroughs will take in the event of under delivery.⁴⁵ With the support of the boroughs and taking account of the information published in accordance with Part D, the Mayor will monitor housing supply against targets on a London-wide basis.

⁴³ Amalgamating flats into larger homes.

⁴⁴ For example, a scheme involving 25 gross new homes and the loss of 10 existing homes would contribute 15 net additional homes towards meeting housing targets.

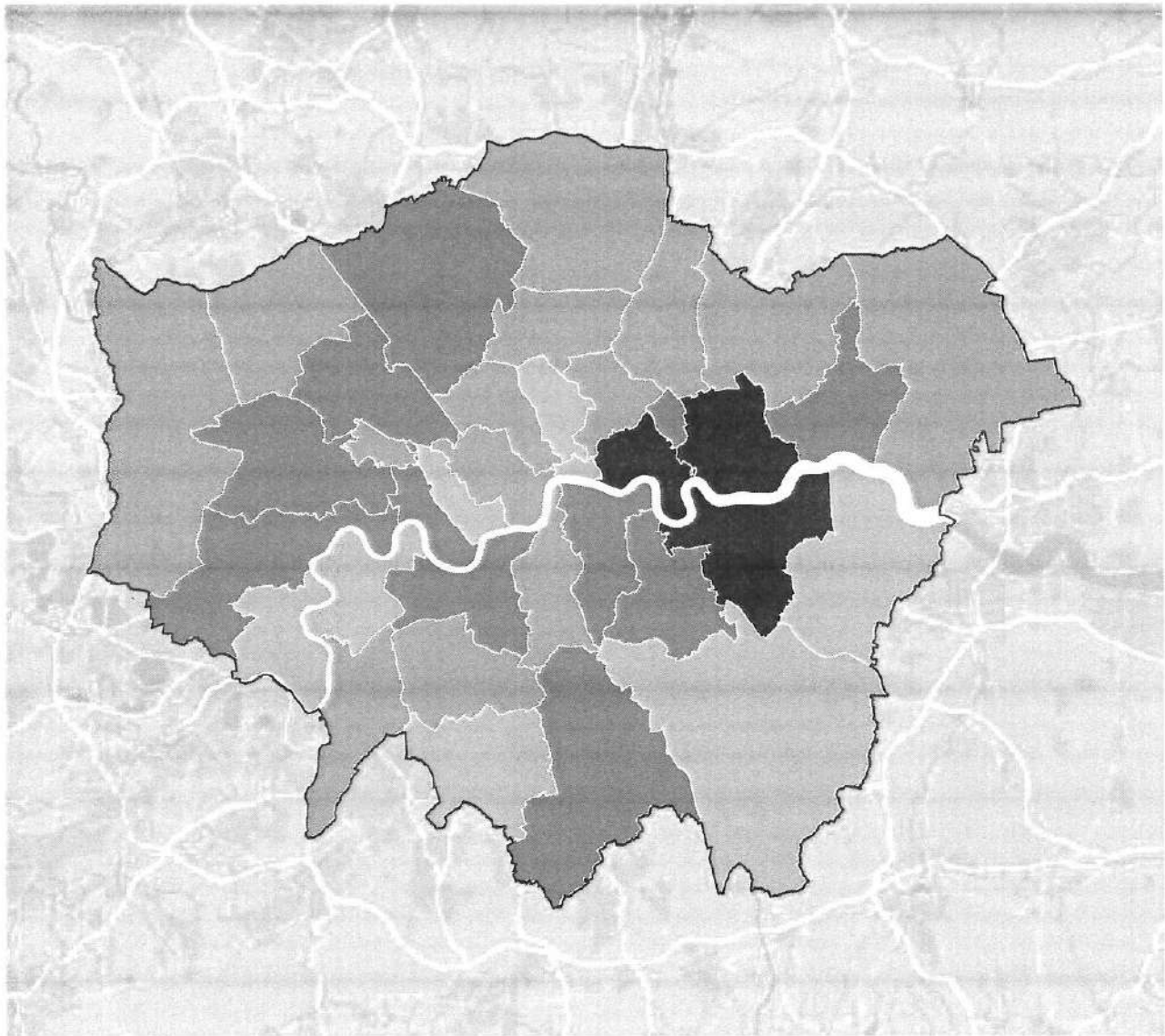
⁴⁵ This would also fulfil the requirement of a 'Housing Delivery Test action plan'

- 4.1.11 If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites.
- 4.1.12 As identified in the Habitats Regulation Assessment, a mitigation strategy for Epping Forest Special Area of Conservation (SAC) is being produced to respond to the impact of additional recreational pressure and air pollution from nearby authorities, including some London boroughs. Should monitoring and evidence demonstrate adverse impacts on the SAC associated with development from London and following the implementation of the mitigation strategy, this will be considered as part of assessing whether a review of the London Plan is required. The GLA will engage with the relevant stakeholders on the formulation and delivery of the mitigation strategy.

Table 4.1 - 10 year targets for net housing completions (2019/20 -2028/29)

Planning Authority	Ten year housing target
Barking & Dagenham	19,440
Barnet	23,640
Bexley	6,850
Brent	23,250
Bromley	7,740
Camden	10,380
City of London	1,460
Croydon	20,790
Ealing	21,570
Enfield	12,460
Greenwich	28,240
Hackney	13,280
Hammersmith & Fulham	16,090
Haringey	15,920
Harrow	8,020
Havering	12,850
Hillingdon	10,830
Hounslow	17,820
Islington	7,750
Kensington & Chelsea	4,480
Kingston	9,640
Lambeth	13,350
Lewisham	16,670
London Legacy Development Corporation	21,540
Merton	9,180
Newham	32,800
Old Oak Park Royal Development Corporation	13,670
Redbridge	14,090
Richmond	4,110
Southwark	23,550
Sutton	4,690
Tower Hamlets	34,730
Waltham Forest	12,640
Wandsworth	19,500
Westminster	9,850
Total	522,870

Figure 4.1 - 10 Year Housing Target for Net Completions



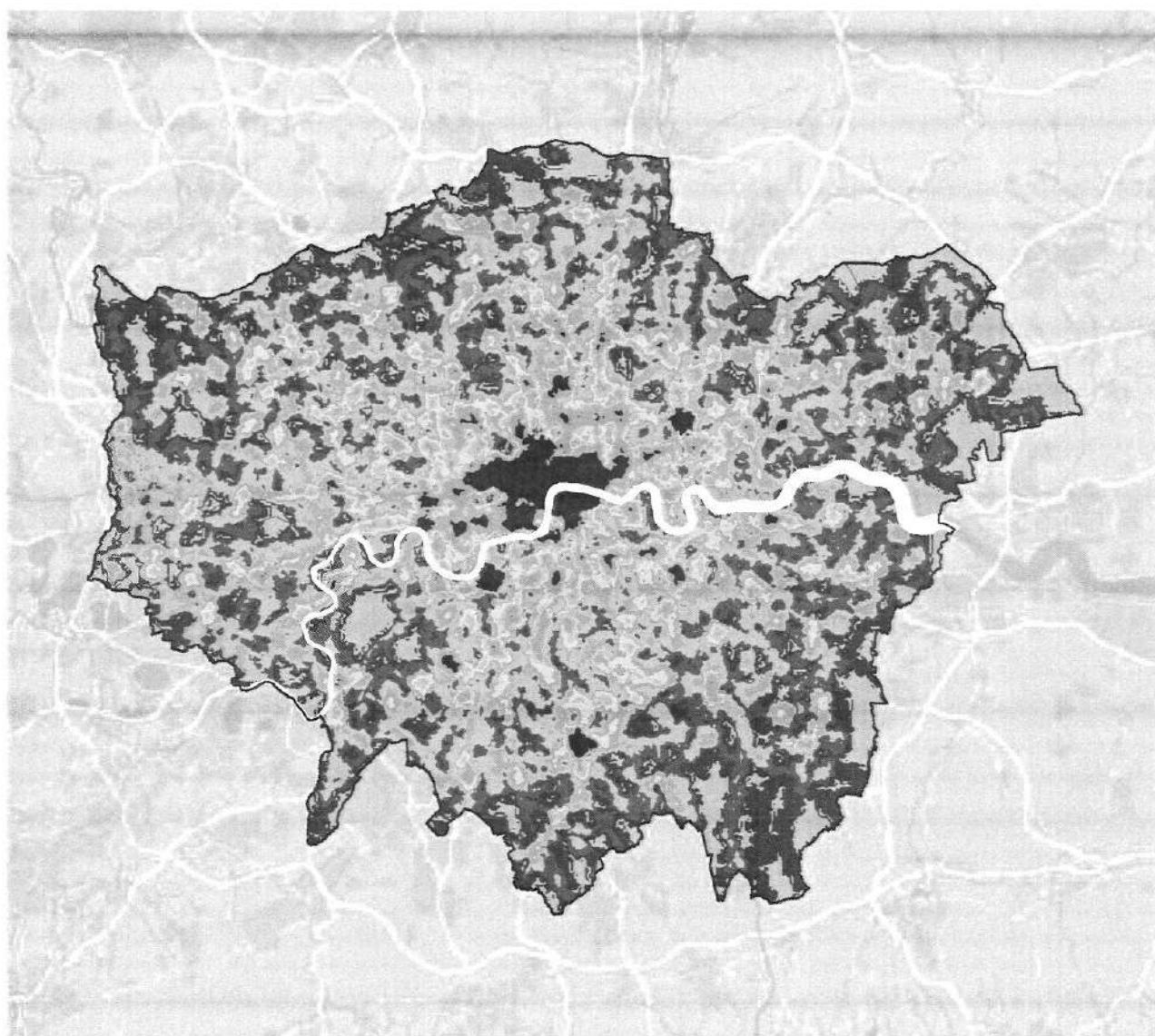
10 Year Housing Target for Net Completions

- 24,001 - 34,730
- 16,001 - 24,000
- 8,001 - 16,000
- 1,460 - 8,000

Source: GLA Planning

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database right (2017)

Figure 4.2 - Public Transport Access



**Public Transport Access Levels
2021**

● 0	● 4
● 1a	● 5
● 1b	● 6a
● 2	● 6b
● 3	

Source: Transport for London (TfL)

Contains OS data © Crown copyright and database right (2017)

Policy H2 Small sites

A Boroughs should pro-actively support well-designed new homes on small sites (below 0.25 hectares in size) through both planning decisions and plan-making in order to:

- 1) significantly increase the contribution of small sites to meeting London's housing needs
- 2) diversify the sources, locations, type and mix of housing supply
- 3) support small and medium-sized housebuilders
- 4) support those wishing to bring forward custom, self-build and community-led housing
- 5) achieve the minimum targets for small sites set out in [Table 4.2](#) as a component of the overall housing targets set out in [Table 4.1](#).

B Boroughs should:

- 1) recognise in their Development Plans that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites
- 2) where appropriate, prepare site-specific briefs, masterplans and housing design codes for small sites
- 3) identify and allocate appropriate small sites for residential development
- 4) list these small sites on their brownfield registers
- 5) grant permission in principle on specific sites or prepare local development orders.

4.2.1 For London to deliver more of the housing it needs, small sites (below 0.25 hectares in size) must make a substantially greater contribution to new supply across the city. Therefore, **increasing the rate of housing delivery from small sites** is a strategic priority. Achieving this objective will require positive and proactive planning by boroughs both in terms of planning decisions and plan-making.

4.2.2 Increasing housing output of this scale can also help to support a number of **related housing and planning policy objectives**. This includes:

- reviving the role of small and medium-sized developers in delivering new homes in London

- diversifying the sources, locations, type and mix of housing supply and the type of sites available in addition to large brownfield sites
- increasing housing provision in accessible parts of outer London to help address the substantial housing need in these areas and deliver market homes in more affordable price brackets
- providing opportunities for custom-build housing and community-led housing projects⁴⁶
- supporting town centre economies
- as with large sites, providing opportunities to support the use of modern methods of construction.

4.2.3 The **small sites minimum targets** in Table 4.2 are informed by the 2017 London SHLAA and show the potential capacity for additional housing on sites of less than 0.25 hectares in size. The targets are based on trends in housing completions on sites of this size and the estimated capacity for net additional housing supply from intensification in existing residential areas, taking into account PTAL, proximity to stations and town centres, and heritage constraints. The small sites targets are a component of, and not additional to, the overall housing targets. The relative contribution from large and small sites in each borough may fluctuate across the target period, providing the overall 10 year borough target is met in a way that is consistent with the policies in the Plan. The small sites target can be taken to amount to a reliable source of windfall sites which contributes to anticipated supply and so provides the compelling evidence in this respect required by paragraph 70 of the National Planning Policy Framework of 2019.

4.2.4 **Incremental intensification** of existing residential areas within PTALs 3-6 or within 800m distance of a station⁴⁷ or town centre boundary⁴⁸ is expected to play an important role in contributing towards the housing targets for small sites set out in Table 4.2. This can take a number of forms, such as: new build, infill development, residential conversions, redevelopment or extension of existing buildings, including non-residential buildings and residential garages, where this results in net additional housing provision. These developments should generally be supported where they provide well-designed additional housing to meet London's needs.

⁴⁶ See Glossary

⁴⁷ Tube, rail, DLR or tram station

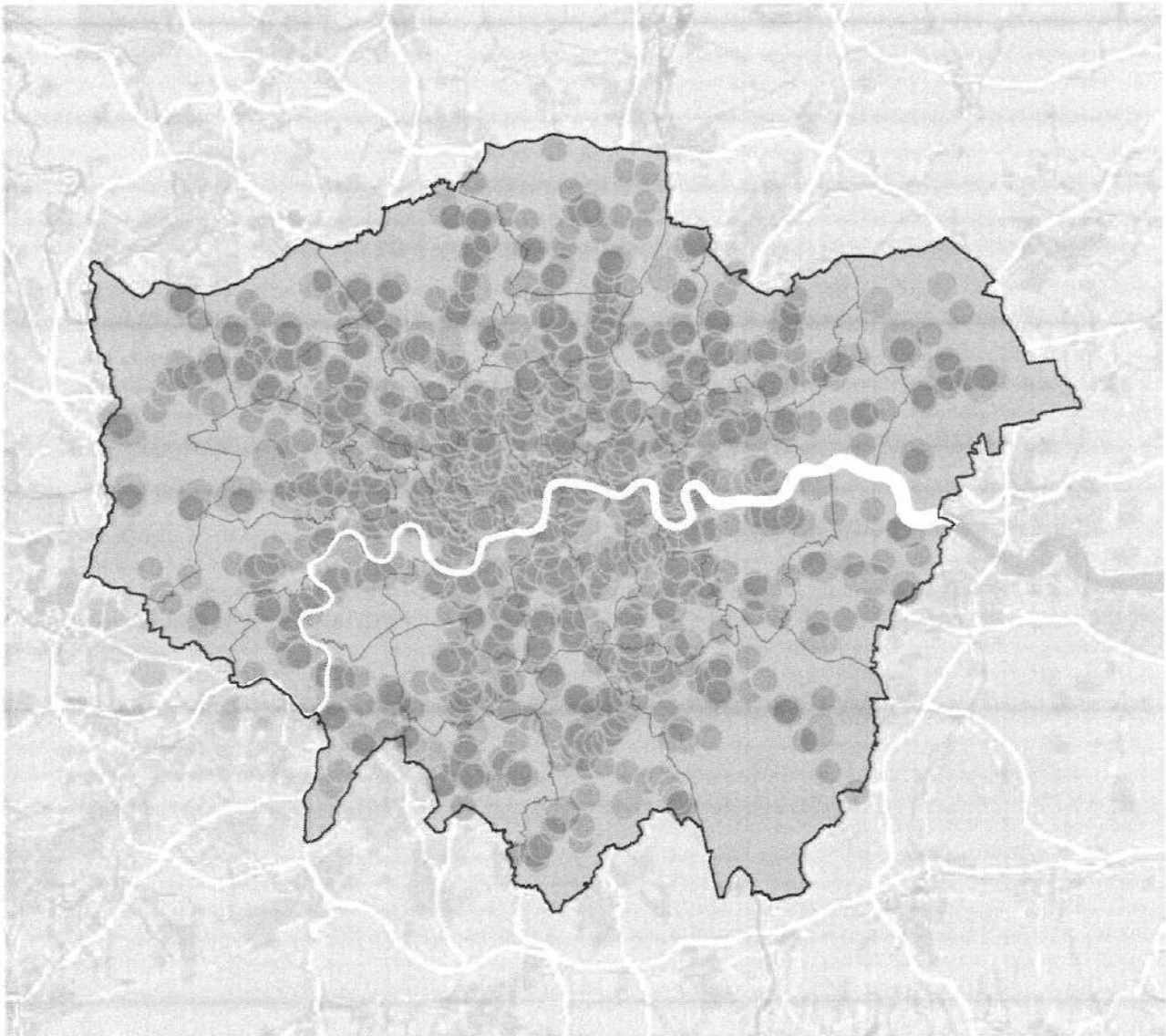
⁴⁸ District, major, metropolitan and international town centres



Table 4.2 - 10 year targets (2019/20 -2028/29) for net housing completions on small sites (below 0.25 hectares in size)

Planning Authority	Ten-year housing target
Barking & Dagenham	1,990
Barnet	4,340
Bexley	3,050
Brent	4,330
Bromley	3,790
Camden	3,280
City of London	740
Croydon	6,410
Ealing	4,240
Enfield	3,530
Greenwich	3,010
Hackney	6,580
Hammersmith & Fulham	2,590
Haringey	2,600
Harrow	3,750
Havering	3,140
Hillingdon	2,950
Hounslow	2,800
Islington	4,840
Kensington & Chelsea	1,290
Kingston	2,250
Lambeth	4,000
Lewisham	3,790
London Legacy Development Corporation	730
Merton	2,610
Newham	3,800
Old Oak Park Royal Development Corporation	60
Redbridge	3,680
Richmond	2,340
Southwark	6,010
Sutton	2,680
Tower Hamlets	5,280
Waltham Forest	3,590
Wandsworth	4,140
Westminster	5,040
Total	119,250

Figure 4.3 - Proximity to town centres and stations



Proximity to town centres and stations

- 800m distance to a underground, rail, DLR or tram station
- 800m distance to a district, major, metropolitan or international town centre

Source: Transport for London (TfL)

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- 4.2.5 The small sites target represents a small amount of the potential for intensification in existing residential areas, particularly in Outer London, **therefore, they should be treated as minimums**. To proactively increase housing provision on small sites through incremental development, Boroughs are encouraged to prepare **area-wide housing design codes**, in particular, for the following forms of development: residential conversions, redevelopment, extensions of houses and/or ancillary residential buildings.
- 4.2.6 The Mayor will set out design principles for housing developments on small sites across London in **design guidance**, which boroughs should draw on and supplement when preparing housing design codes. Housing design codes can be combined with local development orders, where appropriate. As a key purpose of housing design codes is to provide clarity and certainty for potential applicants, boroughs should support design proposals which accord with any published housing design code.
- 4.2.7 When assessing the benefits of additional housing provision, boroughs should recognise that schemes that provide relatively low numbers of new homes play an important cumulative role in helping to deliver housing targets alongside larger developments, subject to the scheme in question making the most efficient use of land.
- 4.2.8 Where existing houses are redeveloped or subdivided, boroughs may require the provision of **family-sized units** (3 bed + units) providing sufficient design flexibility is provided to allow the existing footprint of a house to be enlarged in order to meet this requirement. Where the amalgamation of separate flats into larger homes is leading to the sustained loss of homes and is not meeting the identified requirements of large families, boroughs are encouraged to resist this process.
- 4.2.9 Homes located on the ground floor on minor developments should meet the requirements of Policy D7 Accessible housing. Homes that are not on the ground floor on minor developments can comply with the M4(1) standard, which does not require step-free access, where provision of step-free access would be unfeasible.
- 4.2.10 Impacts on existing biodiversity or **green space**, as a result of minor housing developments, should be minimised and mitigated through measures such as returning hard standing to green space, the installation of green roofs and green walls, or the provision of landscaping that facilitates sustainable urban drainage in order to achieve the **principle of no net loss** of overall green cover.

widespread, where it does happen it reduces the amount of new housing stock being occupied by households in need. Where the practice is widespread in a new building it can also negatively affect the provision of services to tenants.

- 4.9.3 It is unlawful for homes in greater London to be used **as short-term holiday rented accommodation** for a cumulative period of more than 90 days a year without seeking planning permission.⁶⁵ The use of dwellings as short-term holiday rentals can have a detrimental impact on neighbours' residential amenity and community cohesion in the wider area where concentrated in a particular location. The use also reduces the supply of homes available for people to live in.
- 4.9.4 **Houses in multiple occupation** (HMOs) are an important part of London's housing offer, reducing pressure on other elements of the housing stock. Their quality can, however, give rise to concern. Where they are of a 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 affecting changes between Use Classes C3 and C4, boroughs should take into account the strategic as well as local importance of HMOs.

Policy H10 Housing size mix

- A Schemes should generally consist of a range of unit sizes. To determine the appropriate mix of unit sizes in relation to the number of bedrooms for a scheme, applicants and decision-makers should have regard to:
- 1) robust local evidence of need where available or, where this is not available, the range of housing need and demand identified by the 2017 London Strategic Housing Market Assessment
 - 2) the requirement to deliver mixed and inclusive neighbourhoods
 - 3) the need to deliver a range of unit types at different price points across London
 - 4) the mix of uses in the scheme
 - 5) the range of tenures in the scheme

⁶⁵

Pursuant to the Deregulation Act 2015 (sections 44 and 45: Short-term use of London accommodation: relaxation of restrictions and power to relax restrictions.): http://www.legislation.gov.uk/ukpga/2015/20/pdfs/ukpga_20150020_en.pdf

-
- 6) the nature and location of the site, with a higher proportion of one and two bed units generally more appropriate in locations which are closer to a town centre or station or with higher public transport access and connectivity
 - 7) the aim to optimise housing potential on sites
 - 8) the ability of new development to reduce pressure on conversion, sub-division and amalgamation of existing stock
 - 9) the need for additional family housing and the role of one and two bed units in freeing up existing family housing.

B For low-cost rent, boroughs should provide guidance on the size of units required (by number of bedrooms) to ensure affordable housing meets identified needs. This guidance should take account of:

- 1) evidence of local housing needs, including the local housing register and the numbers and types of overcrowded and under-occupying households
- 2) other criteria set out in Part A, including the strategic and local requirement for affordable family accommodation
- 3) the impact of welfare reform
- 4) the cost of delivering larger units and the availability of grant.

4.10.1 The 2017 London Strategic Housing Market Assessment (SHMA) estimated the **unit size mix of new homes** required to meet London's current and projected housing needs using three different scenarios, the results of which are set out in the SHMA report addendum. The main factors influencing this size mix include the projected growth in different household types, assumptions about under-occupation, and the substantial number of overcrowded households in London, whose needs can be addressed by providing family-sized homes but also smaller homes for concealed households to move into. Boroughs can draw on the scenarios in the SHMA to understand housing mix requirements or to inform local assessments. While the SHMA identifies the full range of needs between 2016 and 2041, boroughs may wish to prioritise meeting the most urgent needs earlier in the Plan period, which may mean prioritising low-cost rented units of particular sizes.

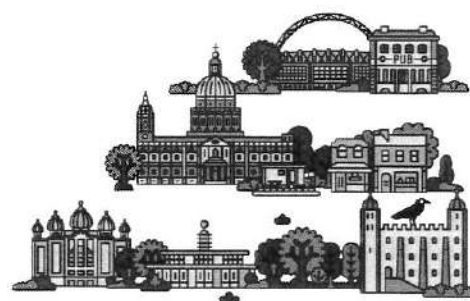
4.10.2 Policy H10 Housing size mix sets out all the issues that applicants and boroughs should take into account when considering the **mix of homes on a**

site. Boroughs are encouraged to set out the preferred housing size mix (for all tenures) as part of a site allocation, ensuring that the housing size mix is **determined in accordance with Parts A and B.** It should be noted that in terms of delivering mixed and inclusive communities, a neighbourhood may currently have an over-concentration of a particular size of unit and a new development could help redress the balance.

- 4.10.3 Well-designed **one- and two- bedroom units** in suitable locations can attract those wanting to downsize from their existing homes, and this ability to free up existing family stock should be considered when assessing the unit mix of a new build development.
- 4.10.4 **One-bedroom units** play a very important role in meeting housing need, and provision in new developments can help reduce the pressure to convert and subdivide existing larger homes. However, one-person and one-bed units are the least flexible unit type so schemes should generally consist of a range of unit sizes.
- 4.10.5 As part of their housing strategy functions, local authorities are required to have an understanding of housing needs in their area (for example, as set out in a Strategic Housing Market Assessment) and this, along with their local Housing Register, will provide the evidence for the **size of low-cost rented homes** (in terms of number of bedrooms) required to meet identified need. Combined with the considerations set out in Part A, this information should inform local policy or guidance about the size (in terms of number of bedrooms) of low-cost rented units expected on a development. This clarity about the unit size mix for affordable homes, taken together with the threshold approach to affordable housing, will help ensure that applicants and landowners understand the cost implications of overall affordable housing requirements when formulating development proposals and purchasing land. Boroughs should take account of the availability of grant funding when producing guidance or policy on this issue.
- 4.10.6 The impact of this policy on the mix of homes in terms of numbers of bedrooms approved across London will be carefully **monitored and assessed** as part of the Annual Monitoring Report process. This will highlight any adverse impacts and identify if any revisions are necessary to the policy.

Chapter 7

Heritage and Culture



Policy HC1 Heritage conservation and growth

- A Boroughs should, in consultation with Historic England, local communities and other statutory and relevant organisations, develop evidence that demonstrates a clear understanding of London's historic environment. This evidence should be used for identifying, understanding, conserving, and enhancing the historic environment and heritage assets, and improving access to, and interpretation of, the heritage assets, landscapes and archaeology within their area.
- B Development Plans and strategies should demonstrate a clear understanding of the historic environment and the heritage values of sites or areas and their relationship with their surroundings. This knowledge should be used to inform the effective integration of London's heritage in regenerative change by:
- 1) setting out a clear vision that recognises and embeds the role of heritage in place-making
 - 2) utilising the heritage significance of a site or area in the planning and design process
 - 3) integrating the conservation and enhancement of heritage assets and their settings with innovative and creative contextual architectural responses that contribute to their significance and sense of place
 - 4) delivering positive benefits that conserve and enhance the historic environment, as well as contributing to the economic viability, accessibility and environmental quality of a place, and to social wellbeing.
- C Development proposals affecting heritage assets, and their settings, should conserve their significance, by being sympathetic to the assets' significance and appreciation within their surroundings. The cumulative impacts of incremental change from development on heritage assets and their settings should also be actively managed. Development proposals should avoid harm and identify enhancement opportunities by integrating heritage considerations early on in the design process.
- D Development proposals should identify assets of archaeological significance and use this information to avoid harm or minimise it through design and appropriate mitigation. Where applicable, development should make provision for the protection of significant archaeological assets and landscapes. The protection of undesignated heritage assets of

archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.

- E Where heritage assets have been identified as being At Risk, boroughs should identify specific opportunities for them to contribute to regeneration and place-making, and they should set out strategies for their repair and re-use.

- 7.1.1 London's historic environment, represented in its built form, landscape heritage and archaeology, provides a depth of character that benefits the city's economy, culture and quality of life. The built environment, combined with its historic landscapes, provides a unique sense of place, whilst layers of architectural history provide an environment that is of **local, national and international value**. London's heritage assets and historic environment are irreplaceable and an essential part of what makes London a vibrant and successful city, and their effective management is a fundamental component of achieving good growth. The Mayor will develop a London-wide Heritage Strategy, together with Historic England and other partners, to support the capital's heritage and the delivery of heritage-led growth.
- 7.1.2 London's **diverse range of designated and non-designated heritage assets** contributes to its status as a world-class city. Designated assets currently include four World Heritage Sites, over 1,000 conservation areas, 19,000 list entries for historic buildings, 150 registered parks and gardens, 160 scheduled monuments, and one battlefield. Non-designated assets cover an even wider range of features including buildings of local interest, most archaeological remains, canals, docks and waterways, historic hedgerows, ancient woodlands, and ancient and veteran trees. The distribution of designated assets differs across different parts of London, and is shown in [Figure 7.1](#), [Figure 7.2](#), [Figure 7.3](#), and [Figure 7.4](#). Note that these maps are for illustrative purposes only.

Notes for Table 8.2

- A. <https://livingroofs.org/intensive-green-roofs/>
- B. <http://www.tdag.org.uk/trees-in-hard-landscapes.html>
- C. <https://livingroofs.org/wp-content/uploads/2016/03/grocode2014.pdf>
- D. <https://www.rhs.org.uk/advice/profile?pid=868>
- E. <http://www.susdrain.org/case-studies/>
- F. <https://www.rhs.org.uk/advice/profile?pid=351>
- G. <https://www.thenbs.com/knowledge/the-nbs-guide-to-facade-greening-part-two>
- H. <https://www.rhs.org.uk/advice/profile?PID=818>
- I. <https://livingroofs.org/wp-content/uploads/2016/03/grocode2014.pdf>
- J. <https://www.susdrain.org/delivering-suds/using-suds/suds-components/source-control/pervious-surfaces/pervious-surface-types/pervious-surface-types.html>

Policy G6 Biodiversity and access to nature

- A Sites of Importance for Nature Conservation (SINCs) should be protected.
- B Boroughs, in developing Development Plans, should:
 - 1) use up-to-date information about the natural environment and the relevant procedures to identify SINCs and ecological corridors to identify coherent ecological networks
 - 2) identify areas of deficiency in access to nature (i.e. areas that are more than 1km walking distance from an accessible Metropolitan or Borough SINC) and seek opportunities to address them
 - 3) support the protection and conservation of priority species and habitats that sit outside the SINC network, and promote opportunities for enhancing them using Biodiversity Action Plans
 - 4) seek opportunities to create other habitats, or features such as artificial nest sites, that are of particular relevance and benefit in an urban context



- 5) ensure designated sites of European or national nature conservation importance are clearly identified and impacts assessed in accordance with legislative requirements.

- C Where harm to a SINC is unavoidable, and where the benefits of the development proposal clearly outweigh the impacts on biodiversity, the following mitigation hierarchy should be applied to minimise development impacts:
- 1) avoid damaging the significant ecological features of the site
 - 2) minimise the overall spatial impact and mitigate it by improving the quality or management of the rest of the site
 - 3) deliver off-site compensation of better biodiversity value.
- D Development proposals should manage impacts on biodiversity and aim to secure net biodiversity gain. This should be informed by the best available ecological information and addressed from the start of the development process.
- E Proposals which reduce deficiencies in access to nature should be considered positively.

8.6.1 **Sites of Importance for Nature Conservation (SINCs) comprise:**

1. Sites of Metropolitan Importance – strategically-important conservation sites for London
2. Sites of Borough Importance – sites which support habitats or species of value at the borough level
3. Sites of Local Importance – sites which are important for the provision of access to nature at the neighbourhood level.

Several Sites of Metropolitan Importance also have statutory European or national nature conservation designations (see paragraph 8.6.3)

8.6.2 The level of protection afforded to SINCS should be commensurate with their status and the contribution they make to wider ecological networks. When undertaking comprehensive reviews of SINCS across a borough, or when identifying or amending Sites of Metropolitan Importance, boroughs should consult the London Wildlife Sites Board.

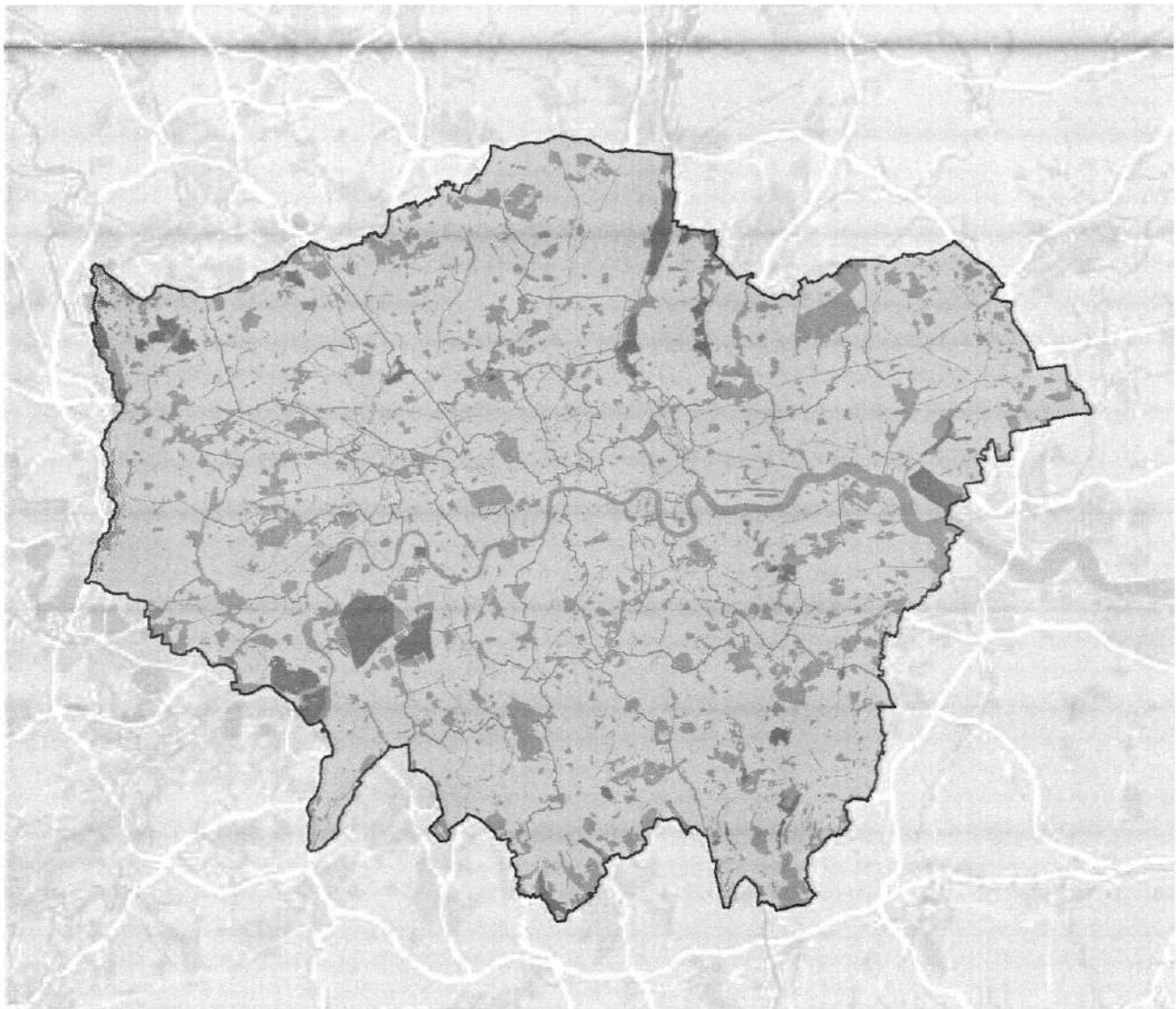


- 8.6.3 Sites with a formal **European or national designation** (including Special Protection Areas, Special Areas of Conservation, Sites of Special Scientific Interest, National Nature Reserves and Local Reserves) are protected by legislation. There are legal provisions which ensure these sites are not harmed by development; there is a duty to consult Natural England on proposals that might affect these sites, and undertake an appropriate assessment of the potential impacts on European sites if a plan or project is likely to have a significant effect on the integrity of a European site.
- 8.6.4 Although heavily urbanised, London consists of a **wide variety of important wildlife habitats**, including a number of sites which have national and international protection. These habitats range from semi-natural features such as chalk grasslands and ancient woodlands to more urban habitats such as reservoirs and vegetated railway corridors. The wildlife value of these sites must be protected and appropriate maintenance regimes should be established to maintain or enhance the wildlife value of sites, recognising the additional pressure some sites may experience due to London's projected growth. Improved sustainable access to wildlife sites should be secured, where appropriate, so that Londoners can better experience and appreciate the natural environment within the city. The connections between protected sites – green corridors – are often critical in helping to sustain wildlife populations that would be vulnerable if they were confined to isolated areas of habitat. London's water spaces make up an important set of habitats in London. Policy SI 17 Protecting and enhancing London's waterways addresses the protection of water spaces, with a particular priority for improving and restoring them. The habitat value of waterways is a key element of their future management.
- 8.6.5 Development proposals that are adjacent to or near **SINCs or green corridors** should consider the potential impact of indirect effects to the site, such as noise, shading or lighting. There may also be opportunities for new development to contribute to enhancing the nature conservation value of an adjacent SINC or green corridor by, for example, sympathetic landscaping that provides complementary habitat. The London Environment Strategy includes guidance on identifying SINCs (Appendix 5) as well as habitat creation targets and a comprehensive list of priority species and habitats that require particular consideration when planning decisions are made. The London Wildlife Sites Board offers help and guidance to boroughs on the selection of SINCs.¹³⁸

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Tree and Woodland Strategy Guidance, Mayor of London, 2013, <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs/tree-and-woodland>

Figure 8.2 - Designated nature conservation sites



Sites of Importance for Nature Conservation and Sites of Special

- Sites of Importance for Nature Conservation (SINC)
- Sites of Special Scientific Interest (SSSI)

Source: Greenspace Information for Greater London (GiGL)

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- 8.6.6 Biodiversity net gain is an approach to development that leaves biodiversity in a better state than before. This means that where biodiversity is lost as a result of a development, the compensation provided should be of an overall greater biodiversity value than that which is lost. This approach does not change the fact that losses should be avoided, and biodiversity offsetting is the option of last resort. The Mayor will be producing guidance to set out how biodiversity net gain applies in London.

Policy G7 Trees and woodlands

- A London's urban forest and woodlands should be protected and maintained, and new trees and woodlands should be planted in appropriate locations in order to increase the extent of London's urban forest – the area of London under the canopy of trees.
- B In their Development Plans, boroughs should:
- 1) protect 'veteran' trees and ancient woodland where these are not already part of a protected site¹³⁹
 - 2) identify opportunities for tree planting in strategic locations.
- C Development proposals should ensure that, wherever possible, existing trees of value are retained.¹⁴⁰ If planning permission is granted that necessitates the removal of trees there should be adequate replacement based on the existing value of the benefits of the trees removed, determined by, for example, i-tree or CAVAT or another appropriate valuation system. The planting of additional trees should generally be included in new developments – particularly large-canopied species which provide a wider range of benefits because of the larger surface area of their canopy.

¹³⁹ Forestry Commission/Natural England (2018): Ancient woodland and veteran trees; protecting them from development, <https://www.gov.uk/guidance/planning-applications-affecting-trees-and-woodland>

¹⁴⁰ Category A, B and lesser category trees where these are considered by the local planning authority to be of importance to amenity and biodiversity, as defined by BS 5837:2012