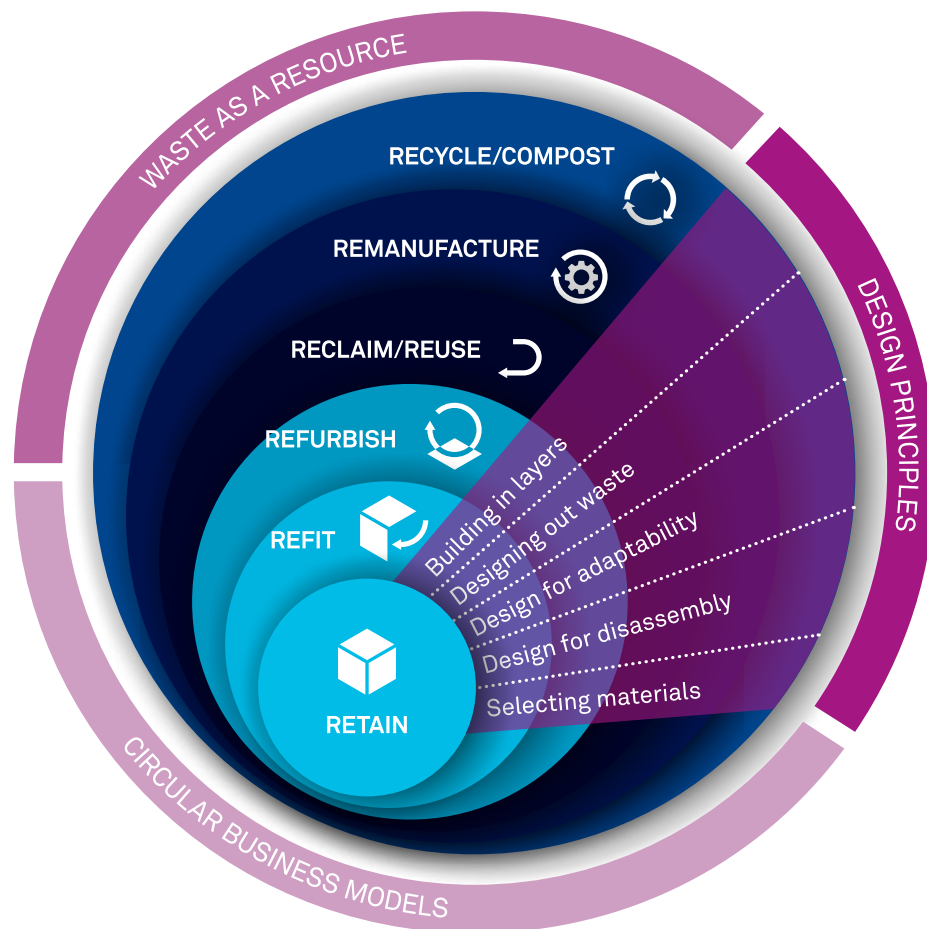


Figure 3.2 - Circular economy hierarchy for building approaches



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: <ul style="list-style-type: none"> • 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: <ul style="list-style-type: none"> • 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	<p>Communal outside amenity spaces should:</p> <ul style="list-style-type: none"> • 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	<p>Private amenity space for each dwelling should be usable and have a balance of openness and protection, appropriate for its outlook and orientation</p>
Usability and ongoing maintenance	
vi	<p>The development should ensure that:</p> <ul style="list-style-type: none"> • 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.

Policy D7 Accessible housing

- A To provide suitable housing and genuine choice for London’s diverse population, including disabled people, older people and families with young children, residential development must ensure that:
- 1) at least 10 per cent of dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(3) ‘wheelchair user dwellings’
 - 2) all other dwellings (which are created via works to which Part M volume 1 of the Building Regulations applies) meet Building Regulation requirement M4(2) ‘accessible and adaptable dwellings’.

- 3.7.1 Many households in London require **accessible or adapted housing** to lead dignified and independent lives. In addition, Londoners are living longer and with the incidence of disability increasing with age, older people should have the choice of remaining in their own homes rather than moving due to inaccessible accommodation. To address these and future needs, Policy D7 Accessible housing should apply to all dwellings which are created via works to which Part M volume 1 of the Building Regulations applies,³⁰ which, at the time of publication of this Plan, generally limits the application of this policy to new build dwellings.
- 3.7.2 Where any part of an **approach route** – including the vertical circulation in the common parts of a block of flats – is shared between dwellings of different categories (i.e. M4(2) and M4(3)), the design provisions of the highest numbered category of dwelling served should be applied, to ensure that people can visit their neighbours with ease and are not limited by the design of communal areas. For residential disabled persons parking requirements – see Policy T6 .1 Residential parking.
- 3.7.3 To ensure that all potential residents have **choice within a development**, the requirement for M4(3) wheelchair user dwellings applies to all tenures. Wheelchair user dwellings should be distributed throughout a development to provide a range of aspects, floor level locations, views and unit sizes.

³⁰ This is governed by the Building Regulations 2010: http://www.legislation.gov.uk/uksi/2010/2214/pdfs/uksi_20102214_en.pdf and the Building Regulations &c. (Amendment) Regulations 2015: http://www.legislation.gov.uk/uksi/2015/767/pdfs/uksi_20150767_en.pdf

- 3.7.4 Standard M4(3) wheelchair user dwellings distinguishes between '**wheelchair accessible**' (a home readily usable by a wheelchair user at the point of completion) and '**wheelchair adaptable**' (a home that can be easily adapted to meet the needs of a wheelchair user). Planning Practice Guidance³¹ states that Local Plan policies for wheelchair accessible homes should only be applied to those dwellings where the local authority is responsible for allocating or nominating a person to live in that dwelling, otherwise M4(3) dwellings should be wheelchair adaptable.
- 3.7.5 As set out in Approved Document M of the Building Regulations, Volume 1: Dwellings, to comply with requirements M4(2) or M4(3), **step-free access** into the dwelling must be provided.
- 3.7.6 In exceptional circumstances the provision of a lift to dwelling entrances may not be achievable. In the following circumstances – and only in blocks of four storeys or less – it may be necessary to apply some flexibility in the application of this policy:
- Specific small-scale infill developments (see [Policy H2 Small sites](#))
 - Flats above existing shops or garages
 - Stacked maisonettes where the potential for decked access to lifts is restricted
- 3.7.7 If it is agreed at the planning stage (for one of the reasons listed above) that a specific development warrants flexibility in the application of the accessible housing standards M4(2) and M4(3), affected dwellings above or below ground floor would be required to satisfy the mandatory building regulations requirements of M4(1) via the Building Control process. M4(2) and M4(3) dwellings should still be required for ground floor units.
- 3.7.8 M4(2) and M4(3) dwellings should be **secured via planning condition** to allow the Building Control body to check compliance of a development against the optional Building Regulations standards. Planning conditions should specify:
- Number of dwellings per size typology (i.e. x no. of y bed units) which must comply with Part M4(2)
 - Number of dwellings per size typology (i.e. x no. of y bed units) which must comply with Part M4(3)(2)(a) wheelchair adaptable standards
 - Number of dwellings per size typology (i.e. x no. of y bed units) which must comply with Part M4(3)(2)(b) wheelchair accessible standards

31

<https://www.gov.uk/guidance/housing-optional-technical-standards>

Policy D8 Public realm

Development Plans and development proposals should:

- A encourage and explore opportunities to create new public realm where appropriate
- B ensure the public realm is well-designed, safe, accessible, inclusive, attractive, well-connected, related to the local and historic context, and easy to understand, service and maintain. Landscape treatment, planting, street furniture and surface materials should be of good quality, fit-for-purpose, durable and sustainable. Lighting, including for advertisements, should be carefully considered and well-designed in order to minimise intrusive lighting infrastructure and reduce light pollution
- C maximise the contribution that the public realm makes to encourage active travel and ensure its design discourages travel by car and excessive on-street parking, which can obstruct people's safe enjoyment of the space. This includes design that reduces the impact of traffic noise and encourages appropriate vehicle speeds
- D be based on an understanding of how the public realm in an area functions and creates a sense of place during different times of the day and night, days of the week and times of the year. In particular, they should demonstrate an understanding of how people use the public realm, and the types, location and relationship between public spaces in an area, identifying where there are deficits for certain activities, or barriers to movement that create severance for pedestrians and cyclists
- E ensure both the movement function of the public realm and its function as a place are provided for and that the balance of space and time given to each reflects the individual characteristics of the area. The priority modes of travel for the area should be identified and catered for, as appropriate. Desire lines for people walking and cycling should be a particular focus, including the placement of street crossings, which should be regular, convenient and accessible
- F ensure there is a mutually supportive relationship between the space, surrounding buildings and their uses, so that the public realm enhances the amenity and function of buildings and the design of buildings contributes to a vibrant public realm

- G ensure buildings are of a design that activates and defines the public realm, and provides natural surveillance. Consideration should also be given to the local microclimate created by buildings, and the impact of service entrances and facades on the public realm
- H ensure appropriate management and maintenance arrangements are in place for the public realm, which maximise public access and minimise rules governing the space to those required for its safe management in accordance with the Public London Charter
- I incorporate green infrastructure such as street trees and other vegetation into the public realm to support rainwater management through sustainable drainage, reduce exposure to air pollution, moderate surface and air temperature and increase biodiversity
- J ensure that appropriate shade, shelter, seating and, where possible, areas of direct sunlight are provided, with other microclimatic considerations, including temperature and wind, taken into account in order to encourage people to spend time in a place
- K ensure that street clutter, including street furniture that is poorly located, unsightly, in poor condition or without a clear function is removed, to ensure that pedestrian amenity is improved. Consideration should be given to the use, design and location of street furniture so that it complements the use and function of the space. Applications which seek to introduce unnecessary street furniture should be refused
- L explore opportunities for innovative approaches to improving the public realm such as open street events and Play Streets
- M create an engaging public realm for people of all ages, with opportunities for social activities, formal and informal play and social interaction during the daytime, evening and at night. This should include identifying opportunities for the meanwhile use of sites in early phases of development to create temporary public realm
- N ensure that any on-street parking is designed so that it is not dominant or continuous, and that there is space for green infrastructure as well as cycle parking in the carriageway. Parking should not obstruct pedestrian lines
- O ensure the provision and future management of free drinking water at appropriate locations in the new or redeveloped public realm.

- 3.8.1 The **public realm** includes all the publicly-accessible space between buildings, whether public or privately owned, from alleyways and streets to squares and open spaces, including the Thames and London's waterways. Some internal or elevated spaces can also be considered as part of the public realm, such as markets, shopping malls, sky gardens, viewing platforms, museums or station concourses. Such forms of public realm are particularly relevant in areas of higher density.
- 3.8.2 The quality of the public realm has a significant influence on quality of life because it affects people's sense of place, security and belonging, as well as having an influence on a range of health and social factors. For this reason, the public realm, and the buildings that frame those spaces, should be attractive, accessible, designed for people and contribute to the highest possible standards of comfort, good acoustic design, security and ease of movement. Higher levels of comfort should be sought in places where people will wish to sit, play, relax, meet, and dwell outside compared to other parts of the public realm that are primarily used for movement. As London's population grows, the demands on London's public realm to accommodate a greater **variety and intensity of uses** will increase. It is particularly important to recognise these demands in higher density development.
- 3.8.3 The public realm should be seen as a series of **connected routes and spaces** that help to define the character of a place. Around eighty per cent of public realm in London is in the form of streets and roads. A small proportion (less than eight per cent) of these have the primary purpose of moving large numbers of vehicles through them, while most are intended to be quiet residential streets used for play, recreation and local access. The remaining streets are places which function as key centres for leisure, shopping, culture, social interaction and accessing services and employment, such as high streets or public squares.
- 3.8.4 The specific balance between the different functions of any one space, such as its place-based activities, its function to facilitate movement and its ability to accommodate different uses of the kerbside, should be at the heart of how the space is designed and managed. The Mayor's **Healthy Streets Approach** explains how the design and management of streets can support a wide range of activities in the public realm as well as encourage and facilitate a shift to active travel.
- 3.8.5 **Pedestrian crossings** should be accessible and provide tactile paving and associated dropped kerbs or level access in accordance with national guidance.
- 3.8.6 Places should be distinctive, attractive and of the highest quality, allowing people to meet, congregate and socialise, as well as providing opportunity for quiet enjoyment. Public realm is **valuable for London's cultural activity**,

providing a stage for informal and everyday culture and for organised cultural activity. The opportunity to incorporate these uses should be identified and facilitated through community engagement, careful design and good acoustic design. Careful consideration is needed of the benefits of using the public realm for particular events and the impact of the events on the use and enjoyment of the space by the public.

- 3.8.7 **Legibility and signposting** make an important contribution to whether people feel comfortable in a place, and are able to understand it and navigate their way around. Transport for London's Streets Toolkit provides detailed design guidance for creating high quality streets and public spaces.
- 3.8.8 Even when a development does not include the creation of new public realm it will have an **impact on neighbouring public realm**. Therefore, any impact or change to the conditions, use or nature of existing public space brought about by a development should meet the requirements of this policy.
- 3.8.9 The effective **management and ongoing maintenance** of public realm should be a key consideration in the design of places and secured through the planning system where appropriate. Whether publicly or privately owned, public realm should be open, free to use and offer the highest level of public access. These spaces should only have rules restricting the behaviour of the public that are considered essential for safe management of the space. The Mayor will develop a 'Public London Charter' which will set out the rights and responsibilities for the users, owners and managers of public spaces irrespective of land ownership. The rules and restrictions on public access and behaviour covering all new or redeveloped public space and its management should be in accordance with the Public London Charter, and this requirement should be secured through legal agreement or planning condition.
- 3.8.10 The **lighting** of the public realm needs careful consideration to ensure it is appropriate to address safety and security issues, and make night-time activity areas and access routes welcoming and safe, while also minimising light pollution.
- 3.8.11 The provision of accessible **free drinking water** fountains helps improve public health, reduces waste from single-use plastic bottles and supports the circular economy through the use of reusable water bottles. Free drinking water fountains that can both refill water bottles directly and be drunk from should be provided in appropriate locations in new or redeveloped public realm. Appropriate locations for these water fountains should be identified by boroughs during the planning process. These locations include areas with high levels of pedestrian activity, such as in town centres and inside shopping malls, as well as areas of the public realm used for play, exercise and relaxing, such

as parks and squares. The ongoing management and maintenance of facilities should be secured and agreed at the planning stage to ensure long-term provision is achievable.

- 3.8.12 Opportunities should be identified by boroughs and applicants for the **meanwhile (temporary) use** of phased development sites to create attractive public realm. Parameters for any meanwhile use, particularly its longevity and associated obligations, should be established from the outset and agreed by all parties. Whilst the creation of temporary public realm makes the best use of land and provides visual, environmental and health benefits to the local community, planning permission for more permanent uses is still required.

Policy D9 Tall buildings

Definition

- A Based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.

Locations

- B
- 1) Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.
 - 2) Any such locations and appropriate tall building heights should be identified on maps in Development Plans.
 - 3) Tall buildings should only be developed in locations that are identified as suitable in Development Plans.

Impacts

- C Development proposals should address the following impacts:
- 1) visual impacts
 - a) the views of buildings from different distances:

- i long-range views – these require attention to be paid to the design of the top of the building. It should make a positive contribution to the existing and emerging skyline and not adversely affect local or strategic views
 - ii mid-range views from the surrounding neighbourhood – particular attention should be paid to the form and proportions of the building. It should make a positive contribution to the local townscape in terms of legibility, proportions and materiality
 - iii immediate views from the surrounding streets – attention should be paid to the base of the building. It should have a direct relationship with the street, maintaining the pedestrian scale, character and vitality of the street. Where the edges of the site are adjacent to buildings of significantly lower height or parks and other open spaces there should be an appropriate transition in scale between the tall building and its surrounding context to protect amenity or privacy.
- b) whether part of a group or stand-alone, tall buildings should reinforce the spatial hierarchy of the local and wider context and aid legibility and wayfinding
 - c) architectural quality and materials should be of an exemplary standard to ensure that the appearance and architectural integrity of the building is maintained through its lifespan
 - d) proposals should take account of, and avoid harm to, the significance of London's heritage assets and their settings. Proposals resulting in harm will require clear and convincing justification, demonstrating that alternatives have been explored and that there are clear public benefits that outweigh that harm. The buildings should positively contribute to the character of the area
 - e) buildings in the setting of a World Heritage Site must preserve, and not harm, the Outstanding Universal Value of the World Heritage Site, and the ability to appreciate it
 - f) buildings near the River Thames, particularly in the Thames Policy Area, should protect and enhance the open quality of the river and the riverside public realm, including views, and not contribute to a canyon effect along the river

- g) buildings should not cause adverse reflected glare
 - h) buildings should be designed to minimise light pollution from internal and external lighting
- 2) functional impact
- a) the internal and external design, including construction detailing, the building's materials and its emergency exit routes must ensure the safety of all occupants
 - b) buildings should be serviced, maintained and managed in a manner that will preserve their safety and quality, and not cause disturbance or inconvenience to surrounding public realm. Servicing, maintenance and building management arrangements should be considered at the start of the design process
 - c) entrances, access routes, and ground floor uses should be designed and placed to allow for peak time use and to ensure there is no unacceptable overcrowding or isolation in the surrounding areas
 - d) it must be demonstrated that the capacity of the area and its transport network is capable of accommodating the quantum of development in terms of access to facilities, services, walking and cycling networks, and public transport for people living or working in the building
 - e) jobs, services, facilities and economic activity that will be provided by the development and the regeneration potential this might provide should inform the design so it maximises the benefits these could bring to the area, and maximises the role of the development as a catalyst for further change in the area
 - f) buildings, including their construction, should not interfere with aviation, navigation or telecommunication, and should avoid a significant detrimental effect on solar energy generation on adjoining buildings
- 3) environmental impact
- a) wind, daylight, sunlight penetration and temperature conditions around the building(s) and neighbourhood must be carefully considered and not compromise comfort and the enjoyment of open spaces, including water spaces, around the building

- b) air movement affected by the building(s) should support the effective dispersion of pollutants, but not adversely affect street-level conditions
- c) noise created by air movements around the building(s), servicing machinery, or building uses, should not detract from the comfort and enjoyment of open spaces around the building
- 4) cumulative impacts
 - a) the cumulative visual, functional and environmental impacts of proposed, consented and planned tall buildings in an area must be considered when assessing tall building proposals and when developing plans for an area. Mitigation measures should be identified and designed into the building as integral features from the outset to avoid retro-fitting.

Public access

- D Free to enter publicly-accessible areas should be incorporated into tall buildings where appropriate, particularly more prominent tall buildings where they should normally be located at the top of the building to afford wider views across London.

3.9.1 Whilst high density does not need to imply high rise, **tall buildings** can form part of a plan-led approach to facilitating regeneration opportunities and managing future growth, contributing to new homes and economic growth, particularly in order to make optimal use of the capacity of sites which are well-connected by public transport and have good access to services and amenities. Tall buildings can help people navigate through the city by providing reference points and emphasising the hierarchy of a place such as its main centres of activity, and important street junctions and transport interchanges. Tall buildings that are of exemplary architectural quality, in the right place, can make a positive contribution to London's cityscape, and many tall buildings have become a valued part of London's identity. However, they can also have detrimental visual, functional and environmental impacts if in inappropriate locations and/or of poor quality design. The processes set out below will enable boroughs to identify locations where tall buildings play a positive role in shaping the character of an area.

- 3.9.2 Boroughs should determine and **identify locations where tall buildings may be an appropriate form of development** by undertaking the steps below:
1. based on the areas identified for growth as part of [Policy D1 London's form, character and capacity for growth](#), undertake a sieving exercise by assessing potential visual and cumulative impacts to consider whether there are locations where tall buildings could have a role in contributing to the emerging character and vision for a place
 2. in these locations, determine the maximum height that could be acceptable
 3. identify these locations and heights on maps in Development Plans.
- 3.9.3 Tall buildings are generally those that are substantially taller than their surroundings and cause a significant change to the skyline. Boroughs should **define what is a 'tall building' for specific localities**, however this definition should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. This does not mean that all buildings up to this height are automatically acceptable, such proposals will still need to be assessed in the context of other planning policies, by the boroughs in the usual way, to ensure that they are appropriate for their location and do not lead to unacceptable impacts on the local area. In large areas of extensive change, such as Opportunity Areas, the threshold for what constitutes a tall building should relate to the evolving (not just the existing) context. This policy applies to tall buildings as defined by the borough. Where there is no local definition, the policy applies to buildings over 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.
- 3.9.4 The higher the building the greater the level of **scrutiny** that is required of its design. In addition, tall buildings that are referable to the Mayor, must be subject to the particular design scrutiny requirements set out in Part D of [Policy D4 Delivering good design](#).
- 3.9.5 The Mayor will work with boroughs to provide a **strategic overview of tall building locations** across London and will seek to utilise 3D virtual reality digital modelling to help identify these areas, assess tall building proposals and aid public consultation and engagement. 3D virtual reality modelling can also help assess cumulative impacts of developments, particularly those permitted but not yet completed.
- 3.9.6 A tall building can be considered to be made up of three main parts: a top, middle and base. The top includes the upper floors, and roof-top mechanical or telecommunications equipment and amenity space. The **top** should be designed to make a positive contribution to the quality and character of the skyline, and mechanical and telecommunications equipment must be integrated in the total

building design. Not all tall buildings need to be iconic landmarks and the design of the top of the building (i.e. the form, profile and materiality) should relate to the building's role within the existing context of London's skyline. Where publicly-accessible areas, including viewing areas on upper floors, are provided as a public benefit of the development, they should be freely accessible and in accordance with Part G of [Policy D8 Public realm](#). Well-designed safety measures should be integrated into the design of tall buildings and must ensure personal safety at height.

- 3.9.7 The **middle** of a tall building has an important effect on how much sky is visible from surrounding streets and buildings, as well as on wind flow, privacy and the amount of sunlight and shadowing there is in the public realm and by surrounding properties.
- 3.9.8 The **base** of the tall building is its lower storeys. The function of the base should be to frame the public realm and streetscape, articulate entrances, and help create an attractive and lively public realm which provides a safe, inclusive, interesting, and comfortable pedestrian experience. The base should integrate with the street frontage of adjacent buildings and, where appropriate, enable the building to transition down in height.
- 3.9.9 Any **external lighting** for tall buildings should be minimal, energy efficient and designed to minimise glare, light trespass, and sky glow, and should not negatively impact on protected views, designated heritage assets and their settings, or the amenity of nearby residents.
- 3.9.10 The list of impacts of tall buildings in [Policy D9 Tall buildings](#) is not exhaustive and **other impacts** may need to be taken into consideration. For example, the impact of new tall buildings in proximity to waterbodies supporting notable bird species upon the birds' flight lines may need to be considered.
- 3.9.11 **Safety** considerations must be central to the design and operation of tall buildings. [Policy D11 Safety, security and resilience to emergency](#) provides information on how to ensure the design of buildings follows best practice to minimise the threats from fire, flood, terrorism, and other hazards and [Policy D12 Fire safety](#) sets out specific requirements to address fire risk.

Policy D10 Basement development

A Boroughs should establish policies in their Development Plans to address the negative impacts of large-scale basement development beneath existing buildings, where this is identified as an issue locally.

- 3.10.1 High residential land values and development constraints have led to **increasing levels of basement development** beneath existing buildings, particularly within central and inner London boroughs.
- 3.10.2 The construction of basements can cause significant disturbance and disruption if not managed effectively, especially where there are cumulative impacts from a concentration of subterranean developments. **Large-scale basements** (i.e. those that are multi-storey and/or those that extend significantly beyond the existing building footprint) can cause particular issues, especially when located in residential or higher density mixed-use areas. Such basement development can impact on land and structural stability as well as causing localised flooding or drainage issues. The extent and duration of construction of large-scale basements can also lead to a large number of HGV trips, as well as noise and vibration issues, causing disturbance to local residents. Measures such as requiring Construction Method and Management Plans can help protect neighbours during construction. Other consents and regulatory regimes may also be involved, such as Environmental Health in regard to noise and contamination, and Highways in relation to licences for skips and temporary structures.
- 3.10.3 The Mayor supports boroughs in **restricting large-scale basement excavations** under existing properties where this type of development is likely to cause unacceptable harm. Local authorities are advised to consider the following issues, including any cumulative impacts, alongside other relevant local circumstances when developing their own policies for basement developments: local ground conditions; flood risk and drainage impacts; land and structural stability; protection of trees, landscape, and biodiversity; archaeology and heritage assets; neighbour amenity; air and light pollution; and the impacts of noise, vibration, dust and site waste. Where particular and cumulative flood risk issues exist, boroughs should consider restricting the use of basements for non-habitable uses. The Agent of Change Principle ([Policy D13 Agent of Change](#)) should be applied to basement development to limit the impact of ground-borne noise and vibration from existing uses and

infrastructure. Further guidance will be provided in Supplementary Planning Guidance.

- 3.10.4 Most proposals for the construction of a basement will require planning permission. These proposals need to be managed sensitively through the planning application process to ensure that their potential impact on the local environment and residential amenity is acceptable.
- 3.10.5 Basement development (small or large) can also cause significant noise and vibration disturbance through the reflection/focusing of ground-borne vibration originating from existing infrastructure, such as London Underground infrastructure, if this issue is not considered and managed effectively during its design and construction. Impact assessments prior to construction should consider the effects on the ground-borne vibration environment and propose appropriate mitigation, especially for surrounding residents.
- 3.10.6 The Mayor considers that **smaller-scale basement excavations**, where they are appropriately designed and constructed, can contribute to the efficient use of land, and provide extra living space without the costs of moving house. In areas where basement developments could cause particular harm, boroughs can consider introducing **Article 4 Directions** to require smaller-scale proposals to obtain planning permission.

Policy D11 Safety, security and resilience to emergency

- A The Mayor uses his convening power to work with relevant partners and stakeholders to ensure and maintain a safe and secure environment in London that is resilient against emergencies including fire, flood, weather, terrorism and related hazards as set out in the London Risk Register.
- B Boroughs should work with their local Metropolitan Police Service 'Design Out Crime' officers and planning teams, whilst also working with other agencies such as the London Fire Commissioner, the City of London Police and the British Transport Police to identify the community safety needs, policies and sites required for their area to support provision of necessary infrastructure to maintain a safe and secure environment and reduce the fear of crime. Policies and any site allocations, where locally justified, should be set out in Development Plans.
- C Development proposals should maximise building resilience and minimise potential physical risks, including those arising as a result of extreme weather,

fire, flood and related hazards. Development should include measures to design out crime that – in proportion to the risk – deter terrorism, assist in the detection of terrorist activity and help mitigate its effects. These measures should be considered at the start of the design process to ensure they are inclusive and aesthetically integrated into the development and the wider area.

- 3.11.1 Londoners look to the Mayor as a civic leader for support, advice and reassurance in the event of a major incident taking place. The role of the Mayor in an attack is an interconnected one and is clarified via his attendance at COBR³² meetings about incidents affecting, or potentially affecting, London. The London Resilience Partnership maintains the **London Risk Register**³³. The London Risk Register provides a summary of the main risks affecting London and identifies the existing risk management arrangements for the risks.
- 3.11.2 New developments, including building refurbishments, should be constructed with resilience at the heart of their design. In particular they should incorporate appropriate **fire safety** solutions and represent best practice in fire safety planning in both design and management. The London Fire Commissioner should be consulted early in the design process to ensure major developments have fire safety solutions built-in. Flooding issues and designing out the effects of flooding are addressed in Chapter 9.
- 3.11.3 Measures to **design out crime**, including counter terrorism measures, should be integral to development proposals and considered early in the design process, taking into account the principles contained in guidance such as the Secured by Design Scheme³⁴ published by the Police. Further guidance is provided by Government on security design³⁵. This will ensure development proposals

³² COBR (often referred to as COBRA) stands for Cabinet Office Briefing Rooms, these are the locations the Government's emergency response committee set up to respond to major events and emergencies.

³³ For further details see <http://www.london.gov.uk/mayor-assembly/mayor/london-resilience>

³⁴ For further details see <http://www.securedbydesign.com/>

³⁵ Crowded Places Guidance, National Counter Terrorism Security Office, 2017: <https://www.gov.uk/government/publications/crowded-places-guidance>; Crowded Places: The Planning System and Counter-Terrorism, Home Office and DCLG, 2012; and Protecting crowded places: design and technical issues, Home Office, Centre for the Protection of National Infrastructure and the National Counter-Terrorism Security Office, 2014: <https://www.gov.uk/government/collections/crowded-places>

provide adequate protection, do not compromise good design, do not shift vulnerabilities elsewhere, and are cost-effective. Development proposals should incorporate measures that are proportionate to the threat of the risk of an attack and the likely consequences of one.

- 3.11.4 By drawing upon current Counter Terrorism principles, new development, including streetscapes and public spaces, should incorporate elements that deter terrorists, maximise the probability of their detection, and delay/disrupt their activity until an appropriate response can be deployed. Consideration should be given to **physical, personnel and electronic security** (including detailed questions of design and choice of materials, vehicular stand off and access, air intakes and telecommunications infrastructure). The Metropolitan Police (Designing Out Crime Officers and Counter Terrorism Security Advisors) should be consulted to ensure major developments contain appropriate design solutions, which mitigate the potential level of risk whilst ensuring the quality of places is maximised.

Policy D12 Fire safety

- A In the interests of fire safety and to ensure the safety of all building users, all development proposals must achieve the highest standards of fire safety and ensure that they:
- 1) identify suitably positioned unobstructed outside space:
 - a) for fire appliances to be positioned on
 - b) appropriate for use as an evacuation assembly point
 - 2) are designed to incorporate appropriate features which reduce the risk to life and the risk of serious injury in the event of a fire; including appropriate fire alarm systems and passive and active fire safety measures
 - 3) are constructed in an appropriate way to minimise the risk of fire spread
 - 4) provide suitable and convenient means of escape, and associated evacuation strategy for all building users
 - 5) develop a robust strategy for evacuation which can be periodically updated and published, and which all building users can have confidence in

- 6) provide suitable access and equipment for firefighting which is appropriate for the size and use of the development.

B All major development proposals should be submitted with a Fire Statement, which is an independent fire strategy, produced by a third party, suitably qualified assessor.

The statement should detail how the development proposal will function in terms of:

- 1) the building's construction: methods, products and materials used, including manufacturers' details
- 2) the means of escape for all building users: suitably designed stair cores, escape for building users who are disabled or require level access, and associated evacuation strategy approach
- 3) features which reduce the risk to life: fire alarm systems, passive and active fire safety measures and associated management and maintenance plans
- 4) access for fire service personnel and equipment: how this will be achieved in an evacuation situation, water supplies, provision and positioning of equipment, firefighting lifts, stairs and lobbies, any fire suppression and smoke ventilation systems proposed, and the ongoing maintenance and monitoring of these
- 5) how provision will be made within the curtilage of the site to enable fire appliances to gain access to the building
- 6) ensuring that any potential future modifications to the building will take into account and not compromise the base build fire safety/protection measures.

- 3.12.1 The **fire safety of developments** should be considered from the outset. Development agreements, development briefs and procurement processes should be explicit about incorporating and requiring the highest standards of fire safety. How a building will function in terms of fire, emergency evacuation, and the safety of all users should be considered at the earliest possible stage to ensure the most successful outcomes are achieved, creating developments that are safe and that Londoners can have confidence living in and using.
- 3.12.2 The matter of fire safety compliance is covered by Part B of the Building Regulations. However, to ensure that development proposals achieve the

highest standards of fire safety, reducing risk to life, minimising the risk of fire spread, and providing suitable and convenient means of escape which all building users can have confidence in, applicants should consider issues of fire safety before building control application stage, taking into account the diversity of and likely behaviour of the population as a whole.

- 3.12.3 Applicants should demonstrate on a site plan that space has been identified for the **appropriate positioning of fire appliances**. These spaces should be kept clear of obstructions and conflicting uses which could result in the space not being available for its intended use in the future.
- 3.12.4 Applicants should also show on a site plan **appropriate evacuation assembly points**. These spaces should be positioned to ensure the safety of people using them in an evacuation situation.
- 3.12.5 Developments, their floor layouts and cores need to be **planned around issues of fire safety and a robust strategy for evacuation from the outset**, embedding and integrating a suitable strategy and relevant design features at the earliest possible stage, rather than features or products being applied to pre-determined developments which could result in less successful schemes which fail to achieve the highest standards of fire safety. This is of particular importance in blocks of flats, as building users and residents may be less familiar with evacuation procedures.
- 3.12.6 Suitable **suppression systems** (such as sprinklers) installed in buildings can reduce the risk to life and significantly reduce the degree of damage caused by fire, and should be explored at an early stage of building design.
- 3.12.7 The provision of **stair cores** which are suitably sized, provided in sufficient numbers and designed with appropriate features to allow simultaneous evacuation should also be explored at an early stage and provided wherever possible.
- 3.12.8 Policy D5 Inclusive design requires development to incorporate **safe and dignified emergency evacuation** for all building users, by as independent means as possible. In all developments where lifts are installed, Policy D5 Inclusive design requires as a minimum at least one lift per core (or more, subject to capacity assessments) to be a suitably sized fire evacuation lift suitable to be used to evacuate people who require level access from the building. Fire evacuation lifts and associated provisions should be appropriately designed and constructed, and should include the necessary controls suitable for the purposes intended.
- 3.12.9 **Fire statements** should be submitted with all major development proposals. These should be produced by a third-party independent, suitably-qualified

assessor. This should be a qualified engineer with relevant experience in fire safety, such as a chartered engineer registered with the Engineering Council by the Institution of Fire Engineers, or suitably qualified and competent professional with the demonstrable experience to address the complexity of the design being proposed. This should be evidenced in the fire statement. Planning departments could work with and be assisted by suitably qualified and experienced officers within borough building control departments and/or the London Fire Brigade, in the evaluation of these statements.

- 3.12.10 **Fire safety and security measures** should be considered in conjunction with one another, in particular to avoid potential conflicts between security measures and means of escape or access of the fire and rescue service. Early consultation between the London Fire Brigade and the Metropolitan Police Service can successfully resolve any such issues.
- 3.12.11 **Refurbishment** that requires planning permission will be subject to London Plan policy. Some refurbishment may not require planning permission; nevertheless, the Mayor expects steps to be taken to ensure all existing buildings are safe, taking account of the considerations set out in this policy, as a matter of priority.

Policy D13 Agent of Change

- A The Agent of Change principle places the responsibility for mitigating impacts from existing noise and other nuisance-generating activities or uses on the proposed new noise-sensitive development. Boroughs should ensure that Development Plans and planning decisions reflect the Agent of Change principle and take account of existing noise and other nuisance-generating uses in a sensitive manner when new development is proposed nearby.
- B Development should be designed to ensure that established noise and other nuisance-generating uses remain viable and can continue or grow without unreasonable restrictions being placed on them.
- C New noise and other nuisance-generating development proposed close to residential and other noise-sensitive uses should put in place measures to mitigate and manage any noise impacts for neighbouring residents and businesses.

- D Development proposals should manage noise and other potential nuisances by:
- 1) ensuring good design mitigates and minimises existing and potential nuisances generated by existing uses and activities located in the area
 - 2) exploring mitigation measures early in the design stage, with necessary and appropriate provisions including ongoing and future management of mitigation measures secured through planning obligations
 - 3) separating new noise-sensitive development where possible from existing noise-generating businesses and uses through distance, screening, internal layout, sound-proofing, insulation and other acoustic design measures.
- E Boroughs should not normally permit development proposals that have not clearly demonstrated how noise and other nuisances will be mitigated and managed.

- 3.13.1 For a long time, the responsibility for managing and **mitigating the impact of noise** and other nuisances on neighbouring residents and businesses has been placed on the business or activity making the noise or other nuisance, regardless of how long the business or activity has been operating in the area. In many cases, this has led to newly-arrived residents complaining about noise and other nuisances from existing businesses or activities, sometimes forcing the businesses or other activities to close.
- 3.13.2 The **Agent of Change principle** places the responsibility for mitigating the impact of noise and other nuisances firmly on the new development. This means that where new developments are proposed close to existing noise-generating uses, for example, applicants will need to design them in a more sensitive way to protect the new occupiers, such as residents, businesses, schools and religious institutions, from noise and other impacts. This could include paying for soundproofing for an existing use, such as a music venue. The Agent of Change principle works both ways. For example, if a new noise-generating use is proposed close to existing noise-sensitive uses, such as residential development or businesses, the onus is on the new use to ensure its building or activity is designed to protect existing users or residents from noise impacts.
- 3.13.3 The Agent of Change principle is included in the National Planning Policy Framework, and **Planning Practice Guidance** provides further information on

how to mitigate the adverse impacts of noise and other impacts such as air and light pollution.³⁶

- 3.13.4 The Agent of Change principle predominantly concerns the impacts of noise-generating uses and activities but **other nuisances** should be considered under this policy. Other nuisances include dust, odour, light and vibrations (see [Policy SI 1 Improving air quality](#) and [Policy T7 Deliveries, servicing and construction](#)). This is particularly important for development proposed for co-location with industrial uses and the intensification of industrial estates (see Part D4 of [Policy E7 Industrial intensification, co-location and substitution](#)). When considering co-location and intensification of industrial areas, boroughs should ensure that existing businesses and uses do not have unreasonable restrictions placed on them because of the new development.
- 3.13.5 Noise-generating **cultural venues** such as theatres, concert halls, pubs, night-clubs and other venues that host live or electronic music should be protected (see [Policy HC5 Supporting London’s culture and creative industries](#)). This requires a sensitive approach to managing change in the surrounding area. Adjacent development and land uses should be brought forward and designed in ways which ensure established cultural venues remain viable and can continue in their present form without the prospect of licensing restrictions or the threat of closure due to noise complaints from neighbours.
- 3.13.6 As well as cultural venues, the **Agent of Change principle should be applied to all noise-generating uses and activities** including schools, places of worship, sporting venues, offices, shops, industrial sites, waste sites, safeguarded wharves, rail and other transport infrastructure.
- 3.13.7 Housing and other **noise-sensitive development** proposed near to an existing noise-generating use should include necessary acoustic design measures, for example, site layout, building orientation, uses and materials. This will ensure new development has effective measures in place to mitigate and minimise potential noise impacts or neighbour amenity issues. Mitigation measures should be explored at an early stage in the design process, with necessary and appropriate provisions secured through planning obligations.
- 3.13.8 Ongoing and longer-term management of mitigation measures should be considered, for example through a **noise management plan**. [Policy T7 Deliveries, servicing and construction](#) provides guidance on managing the impacts of freight, servicing and deliveries.

³⁶ National Planning Policy Guidance, Ministry of Housing, Communities & Local Government, 2014, <https://www.gov.uk/guidance/noise--2>

- 3.13.9 Some **permitted development**, including change of use from office to residential, requires noise impacts to be taken into consideration by the Local Planning Authority as part of the prior approval process. Boroughs must take account of national planning policy and guidance on noise, and therefore the Agent of Change principle would apply to these applications.
- 3.13.10 **Noise and other impact assessments** accompanying planning applications should be carefully tailored to local circumstances and be fit for purpose. That way, the particular characteristics of existing uses can be properly captured and assessed. For example, some businesses and activities can have peaks of noise at different times of the day and night and on different days of the week, and boroughs should require a noise impact assessment to take this into consideration. Boroughs should pay close attention to the assumptions made and methods used in impact assessments to ensure a full and accurate assessment.
- 3.13.11 Reference should be made to [Policy D14 Noise](#) which considers the impacts of noise-generating activities on a wider scale and [Policy SI 1 Improving air quality](#) which considers the impacts of existing air pollution. **Further guidance** on managing and mitigating noise in development is also provided in the Mayor's London Environment Strategy.

Policy D14 Noise

- A In order to reduce, manage and mitigate noise to improve health and quality of life, residential and other non-aviation development proposals should manage noise by:
- 1) avoiding significant adverse noise impacts on health and quality of life
 - 2) reflecting the Agent of Change principle as set out in [Policy D13 Agent of Change](#)
 - 3) mitigating and minimising the existing and potential adverse impacts of noise on, from, within, as a result of, or in the vicinity of new development without placing unreasonable restrictions on existing noise-generating uses
 - 4) improving and enhancing the acoustic environment and promoting appropriate soundscapes (including Quiet Areas and spaces of relative tranquillity)

- 5) separating new noise-sensitive development from major noise sources (such as road, rail, air transport and some types of industrial use) through the use of distance, screening, layout, orientation, uses and materials – in preference to sole reliance on sound insulation
- 6) where it is not possible to achieve separation of noise-sensitive development and noise sources without undue impact on other sustainable development objectives, then any potential adverse effects should be controlled and mitigated through applying good acoustic design principles
- 7) promoting new technologies and improved practices to reduce noise at source, and on the transmission path from source to receiver.

B Boroughs, and others with relevant responsibilities, should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra’s Noise Action Plan for Agglomerations.

- 3.14.1 The **management of noise** is about encouraging the right acoustic environment, both internal and external, in the right place at the right time. This is important to promote good health and a good quality of life within the wider context of achieving sustainable development. The management of noise should be an integral part of development proposals and considered as early as possible. Managing noise includes improving and enhancing the acoustic environment and promoting appropriate soundscapes. This can mean allowing some places or certain times to become noisier within reason, whilst others become quieter. Consideration of existing noise sensitivity within an area is important to minimise potential conflicts of uses or activities, for example in relation to internationally important nature conservation sites which contain noise-sensitive wildlife species, or parks and green spaces affected by traffic noise and pollution. Boroughs, developers, businesses and other stakeholders should work collaboratively to identify the existing noise climate and other noise issues to ensure effective management and mitigation measures are achieved in new development proposals.
- 3.14.2 The **Agent of Change Principle** places the responsibility for mitigating impacts from existing noise-generating activities or uses on the new development. Through the application of this principle existing land uses should not be unduly affected by the introduction of new noise-sensitive uses. Regard should be given to noise-generating uses to avoid prejudicing their potential for intensification or expansion.

- 3.14.3 The management of noise also includes promoting **good acoustic design of the inside of buildings**. Section 5 of BS 8223:2014 provides guidance on how best to achieve this. The Institute of Acoustics has produced advice, Pro:PG Planning and Noise (May 2017), that may assist with the implementation of residential developments. BS4214 provides guidance on monitoring noise issues in mixed residential/industrial areas.
- 3.14.4 Deliberately **introducing sounds** can help mitigate the adverse impact of existing sources of noise, enhance the enjoyment of the public realm, and help protect the relative tranquillity and quietness of places where such features are valued. For example, playing low-level music outside the entrance to nightclubs has been found to reduce noise from queueing patrons, leading to an overall reduction in noise levels. Water features can be used to reduce the traffic noise, replacing it with the sound of falling water, generally found to be more pleasant by most people.³⁷
- 3.14.5 Heathrow and London City Airport Operators have responsibility for noise action plans for airports. Policy T8 Aviation sets out the Mayor’s approach to **aviation-related development**.
- 3.14.6 The definition of **Tranquil Areas, Quiet Areas and spaces of relative tranquillity** are matters for London boroughs. These are likely to reflect the specific context of individual boroughs, such that Quiet Areas in central London boroughs may reasonably be expected not to be as quiet as Quiet Areas in more residential boroughs. Defra has identified parts of Metropolitan Open Land and local green spaces as potential Quiet Areas that boroughs may wish to designate.³⁸

³⁷ For more information on approaches to minimise noise related to road and rail traffic, aircraft, water transport and industry see the Mayor’s Environment Strategy

³⁸ Noise Action Plan: Agglomerations Environmental Noise (England) Regulations 2006 (as amended), Department for Environment Food & Rural Affairs, 2014: https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/276228/noise-action-plan-agglomerations-201401.pdf

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.

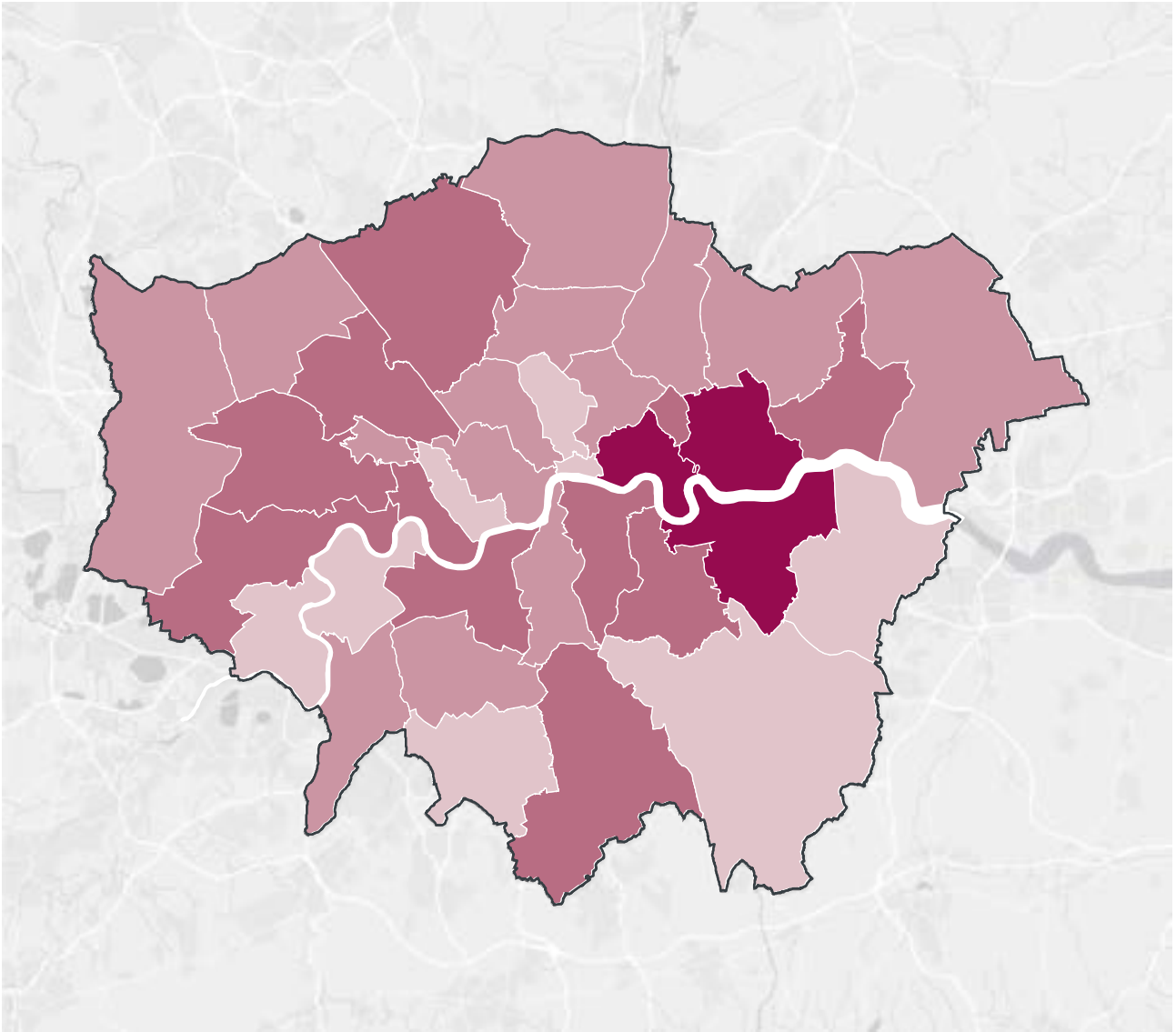
⁴⁵ This would also fulfil the requirement of a ‘Housing Delivery Test action plan’

- 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



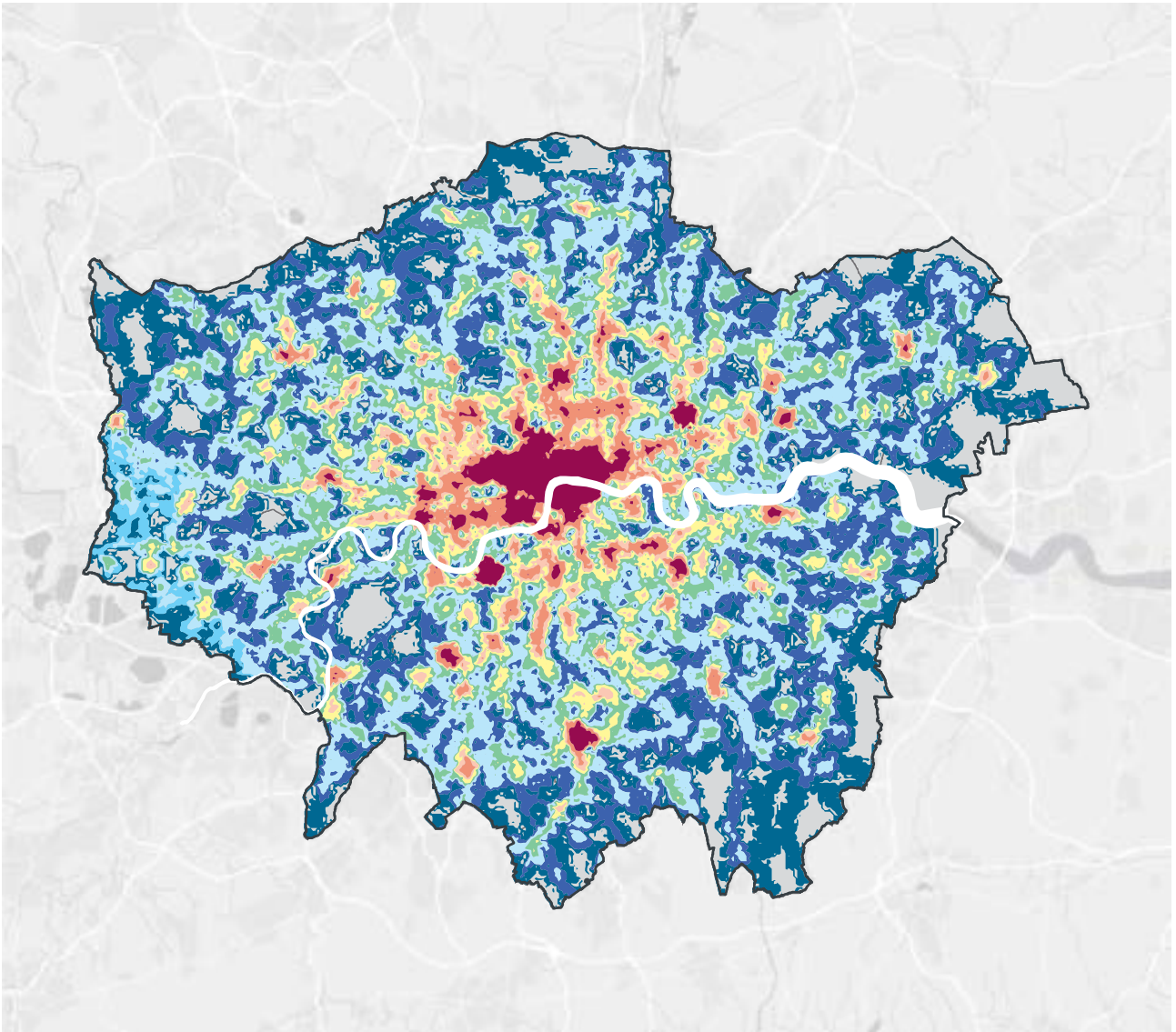
10 Year Housing Target for Net Completions

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

Source: GLA Planning

Contains OS data ©
Crown copyright and
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](#)

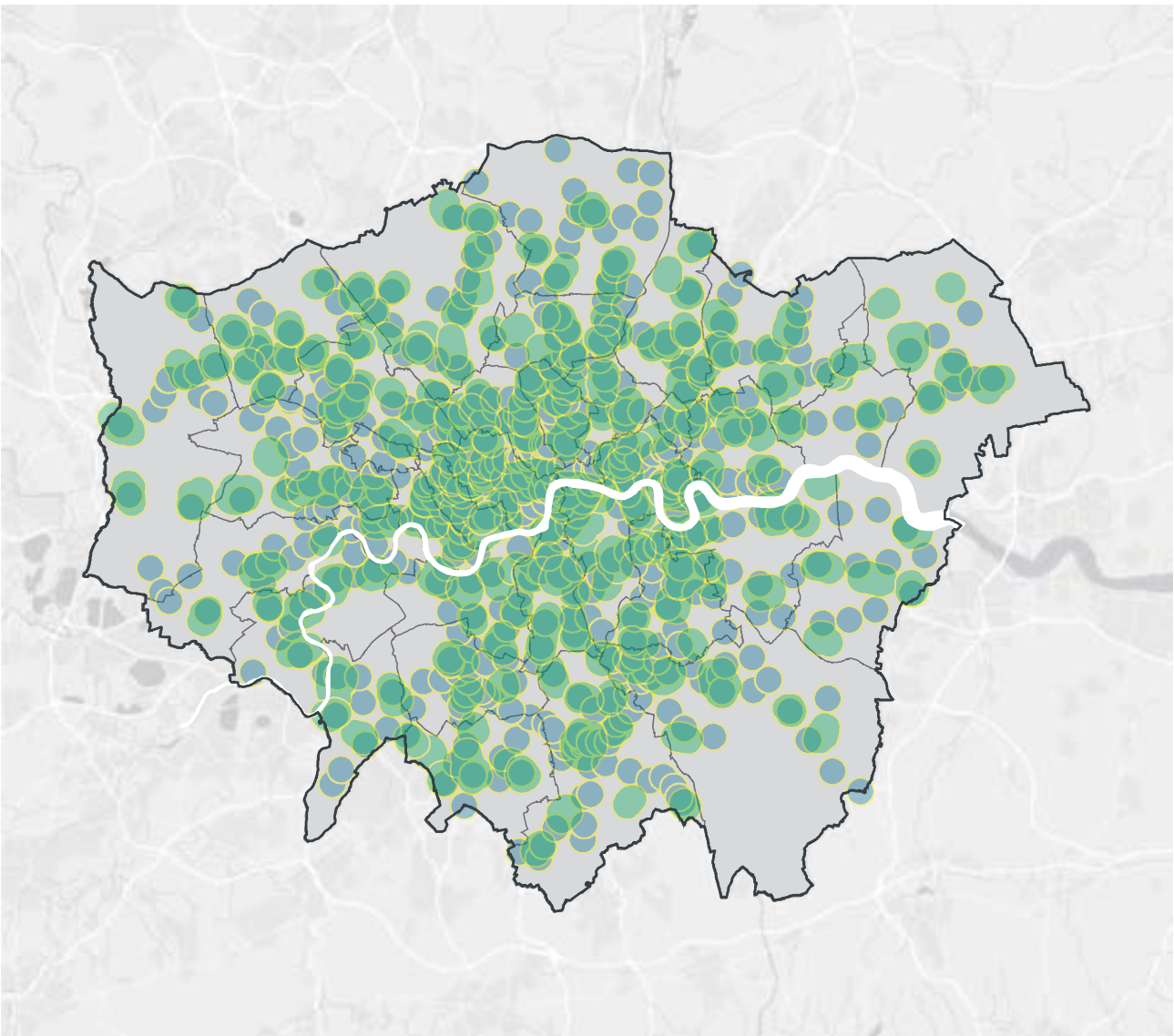
⁴⁷ Tube, rail, DLR or tram station

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)

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

- 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.

- 4.2.11 Small sites can be particularly suitable for well-designed **community-led housing**⁴⁹ projects. Boroughs should support such projects where these developments are integrated with existing neighbourhoods and support mixed and inclusive communities.

Policy H3 Meanwhile use as housing

- A Boroughs are encouraged to identify opportunities for the meanwhile use of sites for housing to make efficient use of land while it is awaiting longer-term development

- 4.3.1 Meanwhile uses are a range of temporary uses on land and property awaiting longer-term development. Some vacant land is suitable for meanwhile use as housing. To make efficient use of land that would otherwise be left vacant, boroughs are encouraged to identify sites that are suitable for residential occupation to be used for **meanwhile housing** including land in both public and private ownership. Opportunities for the meanwhile use of land for housing on large-scale phased developments should be identified during the planning process. The meanwhile use of a site for housing does not change the established land use of the site, and this should be made clear in the temporary planning permission. However, meanwhile housing should count towards meeting a borough's housing target.
- 4.3.2 The meanwhile use of a site must not result in an unacceptable impact on residential amenity or prevent development sites from being brought forward for development in a timely fashion. **Parameters** for any meanwhile use, particularly its longevity and associated obligations, should be established from the outset and agreed by all parties.
- 4.3.3 Meanwhile housing can be provided in the form of **precision-manufactured homes**. This can reduce construction time and the units can potentially be reused at a later date on another site.
- 4.3.4 The **time period** for meanwhile uses will vary and temporary permission may be renewed with consideration for site circumstances. Boroughs should consider starting the time period for the meanwhile use from the date of occupation rather than the date of planning permission, in order to support the viability and delivery of meanwhile housing developments.

⁴⁹ See [Glossary](#)

Policy H4 Delivering affordable housing

- A The strategic target is for 50 per cent of all new homes delivered across London to be genuinely affordable. Specific measures to achieve this aim include:
- 1) requiring major developments which trigger affordable housing requirements⁵⁰ to provide affordable housing through the threshold approach ([Policy H5 Threshold approach to applications](#))
 - 2) using grant to increase affordable housing delivery beyond the level that would otherwise be provided
 - 3) all affordable housing providers with agreements with the Mayor delivering at least 50 per cent affordable housing across their development programme, and 60 per cent in the case of strategic partners⁵¹
 - 4) public sector land⁵² delivering at least 50 per cent affordable housing on each site and public sector landowners with agreements with the Mayor delivering at least 50 per cent affordable housing across their portfolio
 - 5) industrial land appropriate for residential use in accordance with [Policy E7 Industrial intensification, co-location and substitution](#), delivering at least 50 per cent affordable housing where the scheme would result in a net loss of industrial capacity.
- B Affordable housing should be provided on site. Affordable housing must only be provided off-site or as a cash in lieu contribution in exceptional circumstances.

⁵⁰ All major development of 10 or more units triggers an affordable housing requirement. Boroughs may also require affordable housing contributions from minor housing development in accordance with [Policy H2 Small sites](#)

⁵¹ Strategic partners are affordable housing providers who commit to deliver ambitious development programmes through a flexible partnership with the Mayor. Each partnership involves at least 1,000 new housing starts, with at least 60 per cent of them genuinely affordable.

⁵² Separate affordable housing requirements apply to estate regeneration schemes on public sector land, which are set out in [Policy H8 Loss of existing housing and estate redevelopment](#).

- 4.4.1 **Delivering more genuinely affordable housing**⁵³ is a key strategic issue for London. Meeting the need for circa 43,500 affordable homes per year, as established in the 2017 Strategic Housing Market Assessment, will require an increase in affordable housing contributions from all sources. All schemes are expected to maximise the delivery of affordable housing and make the most efficient use of available resources. This is critical to enabling London to meet the housing needs of its workforce and maintain the function and resilience of the city.
- 4.4.2 Past approaches have not adequately met levels of housing need. To provide greater certainty, speed up the planning process and increase affordable housing delivery, the Mayor is adopting a **threshold approach to viability**. This means that schemes meeting or exceeding the threshold without public subsidy,⁵⁴ and consistent with the requirements in Part C of [Policy H5 Threshold approach to applications](#), are not required to submit viability information. The threshold approach was first introduced in the Mayor’s Affordable Housing and Viability SPG. It provides the opportunity to move away from protracted viability debates, create certainty in terms of affordable housing requirements, embed the requirements into land values, and offer a clear incentive for developers to increase affordable housing delivered through the planning system above the level in planning permissions granted in recent years.
- 4.4.3 Schemes that do not meet this threshold, or require public subsidy to do so, will be required to submit detailed viability information which will be scrutinised and treated transparently. **Comprehensive review mechanisms** will be applied to schemes that do not meet the relevant threshold as set out in Part B of [Policy H5 Threshold approach to applications](#), in order to ensure that affordable housing contributions are increased if viability improves over time.
- 4.4.4 Schemes are expected to deliver at least the threshold level of affordable housing without **grant or public subsidy** and to increase this proportion through the use of grant and other subsidy, where available. Only where there are clear barriers to delivery and it is fully justified through detailed viability evidence, in line with the methodology and assumptions set out in [Policy H5 Threshold approach to applications](#) and the Mayor’s Affordable Housing and Viability SPG, should a lower level of affordable housing be considered.

⁵³ The NPPF defines affordable housing for planning purposes. Within this broad definition, sections 4.6.3 - 4.6.9 of this Plan set out the Mayor’s preferred affordable housing tenures and other genuinely affordable housing products

⁵⁴ Public subsidy includes grant, public loans (including the Mayor’s London Housing Bank) and any public land at a reduced cost

- 4.4.5 Given the extent of housing need identified for affordable housing in the 2017 SHMA, the delivery of overall housing targets should not be relied on as a reason for reducing affordable housing delivery or other policy requirements, subject to the approach in this policy, [Policy H5 Threshold approach to applications](#) and [Policy DF1 Delivery of the Plan and Planning Obligations](#). In previous years where there has been a relaxation in affordable housing and other planning requirements this has typically led to higher land values, rather than an increase in housing delivery. Whilst the Plan sets out a clear approach for significantly increasing housing delivery in London, the London SHMA has identified that **65 per cent of London's need is for affordable housing**. Therefore, it is crucial that residential and mixed-use development contributes directly towards the provision of affordable housing and other policy requirements that support the delivery of sustainable development.
- 4.4.6 The Mayor expects all affordable housing providers to deliver as much affordable housing as possible. **Affordable housing providers with agreements with the Mayor** should deliver at least 50 per cent affordable housing across their development programme and, in the case of strategic partners, 60 per cent. Affordable housing commitments by these providers are not planning requirements that can be applied to individual sites as the commitments are only achievable if the affordable housing providers have the flexibility to use their resources strategically to maximise affordable housing provision across London.
- 4.4.7 **Public sector land** represents an opportunity to deliver homes that can meet the needs of London's essential workers who maintain the function and resilience of the city. The Mayor expects that residential proposals on public land should deliver at least 50 per cent affordable housing on each site. Public sector landowners with an agreement with the Mayor may provide 50 per cent affordable housing across a portfolio of sites provided at least 35 per cent affordable housing is provided on each site, with the required affordable housing tenure split on the initial 35 per cent.
- 4.4.8 Most **industrial land** fulfils a vital role in supporting London's economy. However, it is occasionally deemed appropriate for residential uses. In these circumstances, there is potential for a significant difference in value between the two uses. The Mayor expects that residential proposals on industrial land should deliver at least 50 per cent affordable housing where the scheme would result in a net loss of industrial capacity.
- 4.4.9 Affordable housing should be delivered on site to help deliver mixed and inclusive communities providing choice to a range of Londoners. Affordable housing should only be accepted as an **off-site contribution** in exceptional circumstances where it can be robustly demonstrated that affordable housing

cannot be delivered on-site or where an off-site contribution would better deliver mixed and inclusive communities than an on-site contribution.

- 4.4.10 **Cash in lieu** contributions should be used in even more limited circumstances,⁵⁵ and only where there is detailed evidence to demonstrate that on-site affordable housing delivery is not practical, off-site options have been explored but are not acceptable and that accepting a cash in lieu contribution will not be detrimental to the delivery of mixed and inclusive communities.
- 4.4.11 In each case, the approach must result in **additional affordable homes**, meaning the funding should not be used for affordable units that would otherwise have been delivered. It should also take account of the fact that all sites are expected to deliver at least the threshold level of affordable housing and any cash in lieu or off-site contribution should deliver units in addition to this.
- 4.4.12 Cash in lieu contributions should be held in a **separate affordable housing pot**, where resources can be pooled and ring-fenced to enable greater, or more appropriate, new provision to be made off-site. This should either be on an identified site or as part of an agreed programme, in compliance with the statutory tests for use of planning obligations.⁵⁶
- 4.4.13 To avoid incentivising off-site provision or in lieu contributions, agreements for this should provide no financial benefit to the applicant relative to on-site provision and should include **review mechanisms** in line with the Viability Tested Route. The policy target for schemes delivering off-site affordable housing or in lieu contributions is 50 per cent affordable housing provided across the main site and any linked sites when considered as a whole.
- 4.4.14 Boroughs must have in place **monitoring arrangements** to ensure that the additional homes are delivered. As per [Policy H7 Monitoring of affordable housing](#), the Mayor requires information on off-site and cash in lieu delivery as part of the data collection for the Annual Monitoring Report.

⁵⁵ For exceptions see [Policy H2 Small sites](#) and [Policy H16 Large-scale purpose-built shared living](#).

⁵⁶ Community Infrastructure Levy Regulations 2010, Regulation 122(2): http://www.legislation.gov.uk/uksi/2010/948/pdfs/uksi_20100948_en.pdf

Policy H5 Threshold approach to applications

- A The threshold approach applies to major development proposals which trigger affordable housing requirements (see paragraph [4.5.15](#) for scheme types with bespoke approaches).
- B The threshold level of affordable housing on gross residential development is initially set at:
- 1) a minimum of 35 per cent; or
 - 2) 50 per cent for public sector land where there is no portfolio agreement with the Mayor; or
 - 3) 50 per cent for Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites appropriate for residential uses in accordance with [Policy E7 Industrial intensification, co-location and substitution](#) where the scheme would result in a net loss of industrial capacity.
- C To follow the Fast Track Route of the threshold approach, applications must meet all the following criteria:
- 1) meet or exceed the relevant threshold level of affordable housing on site without public subsidy
 - 2) be consistent with the relevant tenure split (see [Policy H6 Affordable housing tenure](#))
 - 3) meet other relevant policy requirements and obligations to the satisfaction of the borough and the Mayor where relevant
 - 4) demonstrate that they have taken account of the strategic 50 per cent target in [Policy H4 Delivering affordable housing](#) and have sought grant to increase the level of affordable housing.
- D Developments which provide 75 per cent or more affordable housing may follow the Fast Track Route where the tenure mix is acceptable to the borough or the Mayor where relevant.
- E Fast tracked applications are not required to provide a viability assessment at application stage. To ensure an applicant fully intends to build out the permission, the requirement for an Early Stage Viability Review will be

triggered if an agreed level of progress on implementation is not made within two years of the permission being granted (or a period agreed by the borough).

- F Where an application does not meet the requirements set out in Part C it must follow the Viability Tested Route. This requires detailed supporting viability evidence to be submitted in a standardised and accessible format as part of the application:
- 1) the borough, and where relevant the Mayor, should scrutinise the viability information to ascertain the maximum level of affordable housing using the methodology and assumptions set out in this Plan and the Affordable Housing and Viability SPG
 - 2) viability tested schemes will be subject to:
 - a) an Early Stage Viability Review if an agreed level of progress on implementation is not made within two years of the permission being granted (or a period agreed by the borough)
 - b) a Late Stage Viability Review which is triggered when 75 per cent of the units in a scheme are sold or let (or a period agreed by the borough)
 - c) Mid Term Reviews prior to implementation of phases for larger phased schemes.
- G Where a viability assessment is required to ascertain the maximum level of affordable housing deliverable on a scheme, the assessment should be treated transparently and undertaken in line with the Mayor's Affordable Housing and Viability SPG.

Scheme amendments – Section 73 applications and deeds of variations

- H For schemes that were approved under the Fast Track Route, and schemes determined before the threshold approach that would have qualified for the Fast Track Route, any subsequent applications to vary the consent will not be required to submit viability information, providing the resultant development continues to meet the relevant threshold and the criteria in Part C.
- I For schemes where the original permission did not meet the threshold or required tenure split, including schemes determined before the threshold approach that would not have qualified for the Fast Track Route, viability information will be required where an application is submitted to vary the consent, and the borough or the Mayor where relevant, consider this would materially alter the economic circumstances of the scheme. Such cases will be assessed under the Viability Tested Route.

- J Any proposed amendments that result in a reduction in affordable housing, affordability or other obligations or requirements of the original permission should be rigorously assessed under the Viability Tested Route. In such instances, a full viability review should be undertaken that reconsiders the value, costs, profit requirements and land value of the scheme.
- K The Mayor should be consulted on any proposed amendments on referable schemes that change the level of affordable housing from that which was secured through the original planning
- 4.5.1 Applicants are strongly encouraged to take the **Fast Track Route** by providing the threshold level of affordable housing and meeting other Development Plan requirements to the satisfaction of the borough.
- 4.5.2 The **Viability Tested Route** will assess the maximum level of affordable housing that a scheme can deliver in cases where the threshold level of affordable housing cannot be met and where fixed or minimum affordable housing requirements are not in place. It is possible that, via the viability assessment using the detailed methodology in the SPG, a greater affordable housing contribution than the threshold level will be found to be viable and thus will be required.
- 4.5.3 The percentage of affordable housing on a scheme should be measured in **habitable rooms**⁵⁷ to ensure that a range of sizes of affordable homes can be delivered, including family-sized homes. Habitable rooms in affordable and market elements of the scheme should be of comparable size when averaged across the whole development. If this is not the case, it may be more appropriate to measure the provision of affordable housing using **habitable floorspace**.⁵⁸ Applicants should present affordable housing figures as a percentage of total residential provision in habitable rooms, units and floorspace to enable comparison.
- 4.5.4 The thresholds set out in this policy have been informed by viability testing. This approach seeks to **embed affordable housing requirements into land values** and create consistency and certainty across London. The 35 per cent threshold level will be monitored and reviewed in 2021 to determine whether this threshold should be increased. Any changes to the threshold will be consulted on as part of an updated Affordable Housing and Viability SPG or through a focused review of the London Plan.

⁵⁷ [Habitable room](#) is defined in the [Glossary](#)

⁵⁸ [Habitable floorspace](#) is defined in the [Glossary](#)

- 4.5.5 The Mayor recognises that **public sector land** can play a significant role in meeting affordable housing need. The threshold for public sector land (land that is owned or in use by a public sector organisation, or company or organisation in public ownership, or land that has been released from public ownership and on which housing development is proposed) is set at 50 per cent to be considered under the Fast Track Route. This is because these sites represent an opportunity to meet a range of objectives, including making better use of sites, improving services and delivering more affordable housing. Moreover, as public assets, these landholdings should be used to deliver development and outcomes that are most needed by – and matter most to – the public.
- 4.5.6 Public sector land also represents an opportunity to deliver homes that can meet the needs of London’s essential workers who maintain the function and resilience of the city, such as those working in health, fire, police, transport and support services. Where there is an agreement with the Mayor to deliver at least 50 per cent across the portfolio of sites, then the **35 per cent threshold should apply to individual sites**.
- 4.5.7 Given the difference in values between **industrial** and residential development, residential development proposals that would result in a net loss of industrial floorspace capacity⁵⁹ on Strategic Industrial Locations, Locally Significant Industrial Sites or Non-Designated Industrial Sites are expected to provide at least 50 per cent affordable housing to follow the Fast Track Route. If this is not possible, detailed viability evidence will be needed to justify a lower level of affordable housing.
- 4.5.8 Where the level of affordable housing offered meets the criteria of Part C, this should normally be considered as meeting the maximum amount of affordable housing which can be delivered through Section 106 (subject to an Early Stage Review Mechanism).
- 4.5.9 Where a scheme meets the threshold level of affordable housing, but the borough, and/or the Mayor where relevant, are not satisfied that the other

⁵⁹ Floorspace capacity is defined here as either the existing industrial and warehousing floorspace on site or the potential industrial and warehousing floorspace that could be accommodated on site at a 65 per cent plot ratio, whichever is the greater. For the purposes of [Policy H5 Threshold approach to applications](#), this floorspace-based approach applies to sites used for utilities infrastructure or land for transport functions that are no longer required. However, it is recognised that some surplus utilities sites are subject to substantial decontamination, enabling and remediation costs. If it is robustly demonstrated that extraordinary decontamination, enabling or remediation costs must be incurred to bring a surplus utilities site forward for development, then a 35 percent affordable housing threshold could be applied, subject to detailed evidence, including viability evidence, being made available.

relevant Development Plan requirements and or obligations for the scheme are met, then the applicant can be asked to provide detailed viability information and be required to follow the **Viability Tested Route**.

- 4.5.10 To incentivise schemes with a high proportion of genuinely affordable housing, schemes that propose **75 per cent or more genuinely affordable housing** may be considered under the Fast Track Route whatever the affordable housing tenure mix, where supported by the borough and, where relevant, the Mayor. This should be determined on a case-by-case basis having regard to the housing need met by the scheme and the level of public subsidy involved.
- 4.5.11 All schemes are expected to maximise the delivery of genuinely affordable housing and make the most efficient use of available resources to achieve this objective. Where **grant or other public subsidy** is available and would increase the proportion of affordable housing, this should be utilised. The higher proportion of affordable housing should be set out in the Section 106 agreement as being subject to grant availability, alongside the proportion viable without grant. Funding will be available on a tariff basis, details of which are set out in the Mayor's Homes for Londoners: Affordable Homes Programme 2016-23.⁶⁰ Applications for schemes of 150 units or more must evidence that they have sought grant to increase levels of affordable housing. Generally, this will be through evidenced discussions with the local authority and registered providers of social housing. Further detail is provided in the Affordable Housing and Viability SPG.
- 4.5.12 The Mayor has provided detailed **guidance on viability assessments** in his Affordable Housing and Viability SPG. This is a material planning consideration for planning applications in London. The Mayor will follow this guidance on referable applications and strongly encourages boroughs to follow it for all applications. Providing a standardised approach helps streamline the system and reduces uncertainty. The aim of a viability assessment is to establish whether the proposed level of affordable housing and other contributions are the maximum that can be reasonably supported or whether further obligations or a greater level of policy compliance could be achieved.
- 4.5.13 The **Existing Use Value Plus (EUV+)** approach to determining the benchmark land value is based on the current use value of a site plus an appropriate site premium. The benefit of this approach is that it clearly identifies the uplift in value arising from the grant of planning permission because it enables comparison with the value of the site without planning permission. The EUV+

⁶⁰ <https://www.london.gov.uk/what-we-do/housing-and-land/homes-londoners-affordable-homes-programmes>

approach is usually the most appropriate approach for planning purposes. It can be used to address the need to ensure that development is sustainable in terms of the NPPF and Development Plan requirements, and in most circumstances the Mayor will expect this approach to be used. An alternative approach should only be considered in exceptional circumstances which must be robustly justified by the applicant and/or the borough in line with the Mayor's SPG.

- 4.5.14 **Viability Review mechanisms** should be applied to all viability tested applications at early and late stages in the development process (and mid-term reviews in the case of longer phased schemes) to ensure that affordable housing delivery is maximised as a result of any future improvement in viability. Further guidance is provided in the Affordable Housing and Viability SPG.
- 4.5.15 Some schemes are not suitable to follow the Fast Track Route. These schemes must follow the **Viability Tested Route**. This includes:
- applications which propose affordable housing **off-site or a cash in lieu contribution** (as set out above)
 - applications for schemes that involve the **demolition of existing affordable dwellings** which should follow the approach set out in Policy H8 Loss of existing housing and estate redevelopment
 - schemes claiming the **vacant building credit**.
- 4.5.16 Policy H11 Build to Rent, Policy H13 Specialist older persons housing, Policy H15 Purpose-built student accommodation and Policy H16 Large-scale purpose-built shared living set out specific affordable housing approaches in those types of development.

Policy H6 Affordable housing tenure

- A The following split of affordable products should be applied to residential development:
- 1) a minimum of 30 per cent low-cost rented homes, as either London Affordable Rent or Social Rent, allocated according to need and for Londoners on low incomes
 - 2) a minimum of 30 per cent intermediate products which meet the definition of genuinely affordable housing, including London Living Rent and London Shared ownership

3) the remaining 40 per cent to be determined by the borough as low-cost rented homes or intermediate products (defined in Part A1 and Part A2) based on identified need.

B To follow the Fast Track Route the tenure of 35 per cent of homes must meet the requirements set out in Part A. The Fast Track Route is also available to applicants that elect to provide low-cost rented homes in place of intermediate homes, provided the relevant threshold level is reached. Where affordable homes are provided above 35 per cent, their tenure is flexible, provided the homes are genuinely affordable (defined in Part A1 and Part A2), and should take into account the need to maximise affordable housing provision, along with any preference of applicants to propose a particular tenure.

- 4.6.1 The 2017 SHMA shows London's significant need for low-cost rental housing; however, the current national funding programme is focused on intermediate products which limits the Mayor's ability to require higher levels of low-cost rented accommodation. The **tenure splits** set out in this policy provide sufficient flexibility to be tailored to meet local needs as well as ensuring that new development delivers a minimum level of low-cost rented accommodation and intermediate accommodation, contributing to the delivery of mixed and inclusive communities. The minimums in Part A1 and Part A2 will be monitored and reviewed in 2021 and, if necessary, updated through Supplementary Planning Guidance, taking account of future affordable housing funding agreements.
- 4.6.2 There is a presumption that the **40 per cent to be decided by the borough** will focus on Social Rent and London Affordable Rent given the level of need for this type of tenure across London. However, it is recognised that for some boroughs a broader mix of affordable housing tenures will be more appropriate either because of viability constraints or because they would deliver a more mixed and inclusive community. The appropriate tenure split should be determined through the Development Plan process or through supplementary guidance.
- 4.6.3 The Mayor is committed to delivering genuinely affordable housing. Within the broad definition of affordable housing, the Mayor's **preferred affordable housing tenures** are:
- homes based on social rent levels, including Social Rent and London Affordable Rent
 - London Living Rent

- London Shared Ownership.

These are described in more detail below.

- 4.6.4 **London Affordable Rent** and Social Rent homes are for households on low incomes where the rent levels are based on the formulas in the Social Housing Regulator’s Rent Standard Guidance. The rent levels for Social Rent homes use a capped formula and London Affordable Rent homes are capped at benchmark levels published by the GLA. Rents for both are significantly less than 80 per cent of market rents, which is the maximum for Affordable Rent permitted in the NPPF. More detail is contained within the Mayor’s Homes for Londoners Affordable Homes Programme funding guidance⁶¹. These homes will be allocated in accordance with need (based on the borough’s allocations policy).
- 4.6.5 **London Living Rent** (LLR) offers Londoners on average incomes a lower rent, enabling them to save for a deposit. The Mayor is introducing LLR as an intermediate affordable housing product with low rents that vary by ward across London. Where funded by the Greater London Authority, LLR will be a Rent to Buy product, with sub-market rents on time-limited tenancies, which will help households on average income levels to save for a deposit. As London Living Rent can be a step to homeownership, it can be considered as an affordable homeownership product.⁶²
- 4.6.6 **London Shared Ownership** is an intermediate ownership product which allows London households who would struggle to buy on the open market, to purchase a share in a new home and pay a low rent on the remaining, unsold, share.
- 4.6.7 **Other affordable housing products** may be acceptable if, as well as meeting the broad definition of affordable housing, they also meet the London Housing Strategy⁶³ definition of genuinely affordable housing and are considered by the borough to be genuinely affordable.
- 4.6.8 Currently all intermediate rented products such as London Living Rent and Discounted Market Rent should be affordable to households on incomes of up to £60,000. Intermediate ownership products such as London Shared Ownership and Discounted Market Sale (where they meet the definition of affordable housing), should be affordable to households on incomes of up to £90,000. Further information on the **income caps** and how they are applied can be found

⁶¹ <https://www.london.gov.uk/what-we-do/housing-and-land/homes-londoners-affordable-homes-programmes>

⁶² Further details on LLR can be found in the London Housing Strategy

⁶³ Mayor of London, 2018, London Housing Strategy: https://www.london.gov.uk/sites/default/files/2018_lhs_london_housing_strategy.pdf

in the Annual Monitoring Report. The caps will be reviewed and updated where necessary in the Annual Monitoring Report.

- 4.6.9 For dwellings to be considered affordable, **annual housing costs**, including mortgage (assuming reasonable interest rates and deposit requirements), rent and service charge, should be no greater than 40 per cent of net household income, based on the household income limits set out above. Boroughs should seek to ensure that intermediate provision provides for households with a range of incomes below the upper limit. For London Living Rent – please refer to the rent setting guidance provided on the GLA website.
- 4.6.10 In addition to the income caps, boroughs may set **other eligibility criteria** for the intermediate units, reflecting local housing need. However, any local criteria including income caps below the maximum amounts set out above, should automatically cascade out to the London-wide eligibility criteria within three months to ensure that units are not left vacant. Re-sales and re-lets should be available to those meeting the London-wide income caps and not be restricted by local eligibility criteria. Homes should be made available through the new Homes for Londoners online portal.
- 4.6.11 To follow the Fast Track Route, the tenure of 35 per cent of homes must adhere to the **tenure split** set out in [Policy H6 Affordable housing tenure](#). Where a scheme is delivering more than 35 per cent, the tenure of the additional affordable housing is flexible and should take into account the need to maximise affordable housing provision along with any preference of applicants to propose a particular tenure.
- 4.6.12 If, when assessing a scheme under the Viability Tested Route, the evidence demonstrates that the threshold cannot be met, the affordable housing tenure split in [Policy H6 Affordable housing tenure](#) should be considered as the starting point for negotiations. It will, however, be for the borough, and the Mayor where relevant, to decide if there should be a greater number of affordable homes, or fewer homes at a deeper discount. Therefore Section 106 agreements should stipulate the **tenure mix** for a scheme and this should be consistent with the assumptions in the viability assessment.

Policy H7 Monitoring of affordable housing

- A Boroughs are required to have clear monitoring processes to ensure that the affordable housing secured on or off site is delivered and recorded in line with the Section 106 agreement.
- B Monitoring processes should ensure that any cash in lieu payments are used to deliver additional affordable housing.
- C Boroughs should ensure that where a review mechanism is triggered, it is implemented and the number of extra homes delivered, or cash in lieu secured, is recorded.
- D Boroughs must publish monitoring information on Parts A – C annually to ensure transparency in the planning process and so the public know how funds are being spent. This information should be shared with the GLA so it can be part of the annual monitoring process.

- 4.7.1 Policy H4 Delivering affordable housing, Policy H5 Threshold approach to applications and Policy H6 Affordable housing tenure set out the approach to affordable housing delivery in London. It is crucial that the implementation of Section 106 agreements and the outcome of review mechanisms are monitored. Policy H7 Monitoring of affordable housing will ensure that boroughs have **monitoring processes** in place to implement Section 106 agreements and that the information is in the public domain.

Policy H8 Loss of existing housing and estate redevelopment

- A Loss of existing housing should be replaced by new housing at existing or higher densities with at least the equivalent level of overall floorspace.
- B Loss of hostels, staff accommodation and shared and supported accommodation that meet an identified housing need should be satisfactorily re-provided to an equivalent or better standard.

Demolition and replacement of affordable housing

- C Before considering the demolition and replacement of affordable homes, boroughs, housing associations and their partners should always consider

alternative options first. They should balance the potential benefits of demolition and rebuilding of homes against the wider social and environmental impacts and consider the availability of Mayoral funding and any conditions attached to that funding.

- D Demolition of affordable housing, including where it is part of an estate redevelopment programme, should not be permitted unless it is replaced by an equivalent amount of affordable housing floorspace. Affordable housing that is replacing social rent housing must be provided as social rent housing where it is facilitating a right of return for existing tenants. Where affordable housing that is replacing social rent housing is not facilitating a right of return, it may be provided as either social rent or London Affordable Rent housing. Replacement affordable housing should be integrated into the development to ensure mixed and inclusive communities.
- E All development proposals that include the demolition and replacement of affordable housing are required to follow the Viability Tested Route and should seek to provide an uplift in affordable housing in addition to the replacement affordable housing floorspace

- 4.8.1 It is important that existing homes of all tenures are well-maintained and are of good quality as these will continue to house the majority of Londoners. However, the **redevelopment and intensification** of London's existing housing has played, and will continue to play, an important role in the evolution of London. The benefits of development proposals that involve the demolition and replacement of existing homes should be balanced against any potential harm.
- 4.8.2 Parts C, D and E of this policy concern the **redevelopment of social housing estates**. This will generally occur as part of a wider process of estate regeneration, some elements of which fall beyond the remit of the London Plan. The Mayor's Good Practice Guide to Estate Regeneration provides detailed guidance for assessing appropriate approaches to estate regeneration. In particular, only once the objectives of an estate regeneration scheme have been formulated in consultation with residents, should the physical interventions required to achieve them be considered. The approach taken will differ from project to project, depending on factors that include: the existing characteristics and quality of an estate; the financial resources available; any regeneration or redevelopment plans that affect the wider area; and the wishes of residents and other stakeholders.

- 4.8.3 The range of physical interventions that may be required to support the delivery of estate regeneration projects include: repairs to, and refurbishment of, existing homes; building new homes on 'infill' sites; and demolition and redevelopment. Different schemes will require different interventions, or a combination of some or all of the above – there is no 'one size fits all' approach. In the Good Practice Guide, the Mayor is clear that when considering options to deliver estate regeneration projects, boroughs, housing associations and their partners should **always consider alternative options to demolition first**. They should balance the potential benefits of demolishing and rebuilding homes against the wider social and environmental impacts of this option.
- 4.8.4 Regardless of whether an estate regeneration project includes the demolition and replacement of affordable homes, it is important that all such schemes are delivered with existing and new residents and communities in mind. All proposals for such schemes should take account of the requirements of the **Mayor's Good Practice Guide** to Estate Regeneration (2018) and the requirement for a ballot of residents when accessing Mayoral funding for schemes that involve demolition.
- 4.8.5 Estate regeneration that involves the loss and replacement of affordable housing should deliver an **uplift in affordable housing** wherever possible. Therefore, all such estate regeneration schemes must go through the Viability Tested Route to demonstrate they have maximised the delivery of any additional affordable housing. For the purposes of this policy, existing affordable housing floorspace includes both occupied and vacant floorspace regardless of the current condition of the stock.
- 4.8.6 Where an affordable housing provider is redeveloping an estate as part of a **wider programme** then it may be possible to re-provide a different mix of affordable housing on the estate (taking account of the wishes of people who want to return to the estate) if the overall level of provision is maintained across the programme and where the approach is acceptable to the borough and, where relevant, the Mayor (further guidance is provided in the Affordable Housing and Viability SPG). The Mayor will closely scrutinise proposals and will only agree to them where he is certain that the housing is being genuinely re-provided and that no better option is available. Given the impact of estate regeneration schemes on existing residents, it is particularly important that information about the viability of schemes is available to the public even where a high level of affordable housing is being delivered

Policy H9 Ensuring the best use of stock

- A Boroughs should promote efficient use of existing housing stock to reduce the number of vacant and under-occupied dwellings.
- B The Mayor will support boroughs with identified issues of new homes being left empty, sometimes known as 'buy to leave' properties, to put in place mechanisms which seek to ensure new homes are occupied.
- C Boroughs should take account of the impact on housing stock and local housing need when considering applications for a change of use from housing to short stay holiday rental accommodation to be used for more than 90 days a year.
- D Boroughs should take account of the role of houses in multiple occupation (HMOs) in meeting local and strategic housing needs. Where they are of a reasonable standard they should generally be protected.

- 4.9.1 Given the pressure for housing and competition for land in London for a variety of uses, it is important to ensure that new homes meet an identified need and are not left vacant long-term (over six months). While the number of **long-term vacant properties** in London has decreased significantly, and is now below one per cent of the housing stock,⁶⁴ to make best use of existing stock, where vacant properties are identified, local authorities should investigate why the units are vacant and where possible seek to bring them back into use. Boroughs should levy the council tax empty homes premium to incentivise occupation of vacant properties. Boroughs are encouraged to use all the tools at their disposal such as Empty Dwelling Management Orders to bring long-term vacant stock back into use as affordable housing. Boroughs should also ensure a range of new homes are provided that meet the needs of those who wish to downsize, and that tenants in affordable homes are supported to downsize where they wish to do so.
- 4.9.2 A recent phenomenon in some parts of London has seen a proportion of new homes being purchased by investors who rely solely on capital appreciation for their returns. New homes purchased for this purpose are sometimes known as '**buy to leave**'. Although GLA evidence suggests this practice is not particularly

⁶⁴ Table 615 from <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>

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.

Policy H11 Build to Rent

- A Where a development meets the criteria set out in Part B, the affordable housing offer can be solely Discounted Market Rent (DMR) at a genuinely affordable rent, preferably London Living Rent level. DMR homes must be secured in perpetuity.
- B To qualify as a Build to Rent scheme the following criteria must be met:
- 1) the development, or block or phase within the development, has at least 50 units⁶⁶
 - 2) the homes are held as Build to Rent under a covenant for at least 15 years⁶⁷
 - 3) a clawback mechanism is in place that ensures there is no financial incentive to break the covenant
 - 4) all the units are self-contained and let separately
 - 5) there is unified ownership and unified management of the private and Discount Market Rent elements of the scheme
 - 6) longer tenancies (three years or more) are available to all tenants. These should have break clauses for renters, which allow the tenant to end the tenancy with a month's notice any time after the first six months
 - 7) the scheme offers rent and service charge certainty for the period of the tenancy, the basis of which should be made clear to the tenant before a tenancy agreement is signed, including any annual increases which should always be formula-linked
 - 8) there is on-site management. This does not necessarily mean full-time dedicated on-site staff, but that all schemes need to have systems for prompt resolution of issues and some daily on-site presence
 - 9) providers have a complaints procedure in place and are a member of a recognised ombudsman scheme

⁶⁶ Boroughs may set their own thresholds to reflect local housing market circumstances and affordable housing need. However, it is important that where a lower threshold is set, Build to Rent schemes must still operate according to the stipulations in this guidance in order to qualify for the application of the Built to Rent policy.

⁶⁷ Covenant periods are expected to increase as the market matures.

10) providers do not charge up-front fees of any kind to tenants or prospective tenants, other than deposits and rent-in-advance.

- C To follow the Fast Track Route, Build to Rent schemes must deliver at least 35 per cent affordable housing, or 50 per cent where the development is on public sector land or industrial land appropriate for residential uses in accordance with [Policy E7 Industrial intensification, co-location and substitution](#). The Mayor expects at least 30 per cent of DMR homes to be provided at an equivalent rent to London Living Rent with the remaining 70 per cent at a range of genuinely affordable rents.⁶⁸ Schemes must also meet all other requirements of Part C of [Policy H5 Threshold approach to applications](#).
- D Where the requirements of C above are not met, schemes must follow the Viability Tested Route set out in [Policy H5 Threshold approach to applications](#). Viability assessments on such schemes should take account of the differences between Build to Rent and Build for Sale development and be undertaken in line with the Affordable Housing and Viability SPG.
- E On schemes that propose a proportion of homes as Build to Rent and a proportion for sale to the market, Part A of this policy will only be suitable for the Build to Rent element. The scheme should be assessed as a whole, with affordable housing calculated as a proportion of total habitable rooms across the scheme.

⁶⁸ Boroughs may publish guidance setting out the proportion of DMR homes to be provided at different rental levels to benefit from the Fast Track Route. In setting local DMR requirements boroughs should have regard to the relationship between the level of discount required and the viability of achieving the relevant threshold level.

- 4.11.1 Boroughs should take a **positive approach to the Build to Rent sector** to enable it to better contribute to the delivery of new homes. Build to Rent developments can make a positive contribution to increasing housing supply and are beneficial in a number of ways. They can:
- attract investment into London’s housing market that otherwise would not exist
 - accelerate delivery on individual sites as they are less prone to ‘absorption constraints’⁶⁹ on build-out rates
 - deliver more readily across the housing market cycle as they are less impacted by house price downturns
 - provide a more consistent and at-scale demand for off-site manufacture
 - offer longer-term tenancies and more certainty over long-term availability
 - ensure a commitment to, and investment in, place-making through single ownership
 - provide better management standards and better quality homes than much of the mainstream private rented sector.
- 4.11.2 The **Build to Rent Policy** has been developed in recognition of the fact that Build to Rent operates a different model to Build for Sale. Build to Rent relies on income through rent over a number of years, rather than an upfront return on sales (this is often referred to as the ‘distinct economics’ of the sector). Because of this, in some circumstances Build to Rent may not be able to compete for land on an equal footing with speculative Build for Sale, as it may generate lower initial land values. Longer term, however, Build to Rent is an attractive offer to institutional investors. This policy provides a specific approach to the affordable housing offer, where the aim is to maintain the integrity of the Build to Rent development, with unified ownership and management of all the homes.
- 4.11.3 Where a developer is proposing a Build to Rent development which meets the definition set out in Part B, the affordable housing offer can be entirely **Discounted Market Rent (DMR)**, managed by the Build to Rent provider and delivered without grant, i.e. entirely through planning gain. As it is not a requirement to be a local authority or a Registered Provider to deliver or manage intermediate rented homes that are delivered without grant, these units can be owned and/or managed by Build to Rent landlords themselves. DMR units should

⁶⁹ The absorption rate is how long it will take a home to sell or be let for the identified price. The main constraint on absorption is the number of buyers or renters in the market willing (or able) to buy or rent the property at the identified price.

be fully integrated into the development with no differences between DMR and market units.

- 4.11.4 The Mayor's strong preference is for DMR homes to be let at **London Living Rent** level, to ensure city-wide consistency in approach. Unlike other DMR products, London Living Rent has an advantage in that it has a London-wide electoral mandate, can be consistently understood and applied across London, can earn the public's trust as being genuinely affordable, and will be backed by the GLA who will uprate it every year. DMR should be allocated according to intermediate eligibility criteria, which can include locally defined eligibility criteria. Where the borough has an intermediate or DMR waiting list they should agree with the applicant a process for providing priority access to the DMR units for those on the waiting list.
- 4.11.5 A threshold level of affordable housing has been introduced to provide an opportunity for Built to Rent schemes to take advantage of the Fast Track Route offered to Build for Sale schemes.
- 4.11.6 To follow the **Fast Track Route** schemes should provide the threshold level of DMR homes with at least 30 per cent let at London Living Rent levels. The remainder should be provided at a range of genuinely affordable discounts below market rent based on local need to be agreed with the borough and Mayor where relevant. The thresholds and required discounts to market rent will be reviewed and if necessary updated in 2021 through Supplementary Planning Guidance.
- 4.11.7 Proposals that do not provide 35 per cent affordable housing at the required discount to market rents, or 50 per cent on public sector land, or 50 per cent on industrial land appropriate for residential uses in accordance with [Policy E7 Industrial intensification, co-location and substitution](#) where the scheme would result in a net loss of industrial capacity, or that do not meet the criteria of Part C of [Policy H5 Threshold approach to applications](#) will be subject to the **Viability Tested Route** under Part E of [Policy H5 Threshold approach to applications](#).
- 4.11.8 In all cases the borough must ensure that the DMR units fully meet the definition of **intermediate housing** and are affordable to those eligible for intermediate rented housing in London, taking into account the Mayor's guidance on this issue.
- 4.11.9 Schemes that do not meet the Build to Rent definition set out in Part B and that do not provide a 15-year covenant or a clawback agreement in line with the Mayor's guidance will not qualify for the Build to Rent policy approach. These will be treated as **Build for Sale** developments for the purposes of determining affordable housing requirements.

- 4.11.10 Where justified in a Development Plan, boroughs can require a proportion of affordable housing as **low-cost rent** (social rent or London Affordable Rent see 4.6.4) on Build to Rent schemes in accordance with Part A of Policy H6 Affordable housing tenure. Low-cost rent homes must be managed by a registered provider. The low-cost rent affordable housing would contribute towards the relevant threshold required to meet the fast track route, as set out in paragraph 4.11.6. DMR is an intermediate product and is managed and allocated as such, therefore it is not appropriate to seek DMR at or close to social rent levels.
- 4.11.11 Schemes that qualify for the Fast Track Route will not need to provide a full viability assessment but will be subject the **15-year covenant and clawback** given the Build to Rent policy approach to affordable housing.⁷⁰
- 4.11.12 The majority of DMR products, where they meet the requirements of the Community Infrastructure Levy (CIL) regulations qualify for **mandatory CIL relief**.⁷¹
- 4.11.13 Further **support for Build to Rent** can be given by boroughs through:
- allocating specific sites for Build to Rent or requiring an element of Build to Rent on larger sites in order to accelerate build out of the site
 - encouraging long-term institutional investment, working with the GLA and partners
 - supporting institutional investment on public sector land, including exploring the use of joint ventures or deferred receipts.
- 4.11.14 Further guidance on Build to Rent schemes can be found in the Mayor's Affordable Housing and Viability SPG.

⁷⁰ A valuation of the market and affordable units must be included within the S106 agreement to enable the level of clawback to be calculated in the event that the covenant is broken.

⁷¹ The Community Infrastructure Levy (Amendment) Regulation 2015 – amendment to Part 6 – exemptions and reliefs.

Policy H12 Supported and specialised accommodation

A The delivery, retention and refurbishment of supported and specialised housing which meets an identified need should be supported. The form this takes will vary, and it should be designed to satisfy the requirements of the specific use or group it is intended for, whilst providing options within the accommodation offer for the diversity of London’s population, including disabled Londoners (see [Policy D7 Accessible housing](#)) within a wider inclusive community setting. Boroughs should undertake assessments of the need for short-term, medium-term and permanent supported and specialised accommodation within their borough. Supported and specialised accommodation could include:

- 1) accommodation for people leaving hostels, refuges and other supported housing, as well as care leavers and people leaving prison to enable them to live independently
- 2) accommodation for young people with support needs
- 3) reablement accommodation (intensive short-term) for people who are ready to be discharged from hospital but who require additional support to be able to return safely to live independently at home, or to move into appropriate long-term accommodation
- 4) accommodation for disabled people (including people with physical and sensory impairments and learning difficulties) who require additional support or for whom living independently is not possible
- 5) accommodation (short-term or long-term) for people with mental health issues who require intensive support
- 6) accommodation for rough sleepers
- 7) accommodation for victims of domestic abuse
- 8) accommodation for victims of violence against women and girls

4.12.1 In undertaking **assessments of the need for supported and specialised accommodation**, existing accommodation options available within boroughs should be audited identifying any shortages in capacity or potential extra capacity within schemes, as well as accommodation in need of refurbishment. Boroughs should then use this information to plan to meet identified need, working with relevant authorities, such as children’s and adult services, the NHS

and relevant charities. For some groups, need may be best assessed and met on a multi-borough or pan-London basis.

- 4.12.2 Supported and specialised accommodation can include accommodation that incorporates support for a particular group, sometimes until they are ready to move on. This could potentially be in a hostel setting and is likely to include some communal facilities, but it does not include visitor accommodation.

Policy H13 Specialist older persons housing

- A Boroughs should work positively and collaboratively with providers to identify sites which may be suitable for specialist older persons housing taking account of:
- 1) local housing needs information including data on the local type and tenure of demand, and the indicative benchmarks set out in [Table 4.3](#)
 - 2) the need for sites to be well-connected in terms of contributing to an inclusive neighbourhood, having access to relevant facilities, social infrastructure and health care, and being well served by public transport
 - 3) the increasing need for accommodation suitable for people with dementia.
- B Specialist older persons housing provision should deliver:
- 1) affordable housing in accordance with [Policy H4 Delivering affordable housing](#), and [Policy H5 Threshold approach to applications](#)
 - 2) accessible housing in accordance with [Policy D7 Accessible housing](#)
 - 3) the highest standards of accessible and inclusive design in accordance with [Policy D5 Inclusive design](#)
 - 4) suitable levels of safe storage and charging facilities for residents' mobility scooters
 - 5) pick up and drop off facilities close to the principal entrance suitable for taxis (with appropriate kerbs), minibuses and ambulances.

- 4.13.1 While London is a 'young city', it is expected to experience substantial growth in its older population. By 2029 the number of older person households (aged 65 and over) will have increased by 37 per cent, with households aged 75 and over (who are most likely to move into specialist older persons housing) increasing by 42 per cent. Appropriate accommodation is needed to **meet the needs of older Londoners**.
- 4.13.2 Some older Londoners may wish to **downsize**, move closer to family or friends or be closer to services and facilities, but they may not want to move into specialist older persons housing. Boroughs and applicants should recognise the important role that new, non-specialist residential developments play in providing suitable and attractive accommodation options for older Londoners, particularly developments in or close to town centres, near to relevant facilities and in areas well-served by public transport.
- 4.13.3 In some circumstances, older people may choose to seek alternative, more tailored **specialist accommodation**. There is a range of specialist accommodation options providing a different offer and level of care.
- 4.13.4 This policy contains requirements for 'specialist older person housing'. It does not apply to accommodation that has the following attributes, which is considered '**care home accommodation**':
- personal care and accommodation are provided together as a package with no clear separation between the two
 - the person using the service cannot choose to receive personal care from another provider
 - people using the service do not hold occupancy agreements such as tenancy agreements, licensing agreements, licences to occupy premises, or leasehold agreements or a freehold
 - likely CQC-regulated activity⁷² will be 'accommodation for persons who require nursing or personal care'

⁷² Housing with care: Guidance on regulated activities for providers of supported living and extra care housing, Care Quality Commission, 2015 <https://www.cqc.org.uk/files/housing-care-october-2015>

- 4.13.5 Specialist older persons housing that does not provide an element of care but is specifically designed and managed for older people (minimum age of 55 years) is covered by the requirements of this policy.
- 4.13.6 In addition to this, the requirements of this policy also cover specialist older persons housing that has the following attributes:
- i. where care is provided or available;
 - a. there are separate contracts/agreements in place for the personal care and accommodation elements, and/or
 - b. residents have a choice as to who provides their personal care
 - ii. housing is occupied under a long lease or freehold, or a tenancy agreement, licensing agreement, license to occupy premises or a leasehold agreement
 - iii. housing provided is specifically designed and managed for older people (minimum age of 55 years)
 - iv. likely CQC-regulated activity⁷³ will be 'personal care'
- 4.13.7 Where a development does not meet the attributes of 'specialist older persons housing' as defined by paragraph 4.13.6 or the attributes of 'care home accommodation' as defined by paragraph 4.13.4, then the general housing policies in the Plan apply.
- 4.13.8 Research⁷⁴ has identified a **total potential demand** in London across all tenures for just over 4,000 specialist older persons units a year between 2017 and 2029. [Table 4.3](#) provides annual borough benchmarks for specialist older persons housing 2017-2029.
- 4.13.9 These benchmarks are designed to inform **local level assessments** of specialist housing need. Boroughs should plan proactively to meet identified need for older persons accommodation.
- 4.13.10 Looking beyond 2029 to 2041, the number of older persons households will continue to increase, although at a slightly slower rate than from 2017 to 2029.
- 4.13.11 The fast track route for affordable housing delivery is available for specialist older persons housing providers. Where an application does not meet the requirements set out in Part C of [Policy H5 Threshold approach to applications](#)

⁷³ Housing with care: Guidance on regulated activities for providers of supported living and extra care housing, Care Quality Commission, 2015 <https://www.cqc.org.uk/files/housing-care-october-2015>

⁷⁴ London Plan research reports can be found at <https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-technical-and-research-reports>

it must follow the Viability Tested Route. However, the **tenure split** requirements for specialist older persons housing may differ to those set out in [Policy H6 Affordable housing tenure](#). Where they do, they should be clearly set out in local Development Plan Documents or supplementary guidance.

- 4.13.12 Specialist older persons housing developments should also provide a suitable level of **safe storage and charging facilities** for residents' mobility scooters, to prevent the storage of these in communal corridors or spaces which are not designed or suitable for this purpose.
- 4.13.13 **Dementia** does not just affect older people; however the total number of older people with dementia in London is forecast to rise from 73,825 in 2017 to 96,939 in 2029, an increase of 31 per cent. Methods of offering support for people with dementia have improved in recent years, as have accommodation options. There is currently no clear evidence identifying the best method of provision of dementia care or accommodation, and it is likely that a range of solutions will continue to develop. Boroughs should consider the need for accommodation for people with dementia within specialist older persons housing developments.
- 4.13.14 **Care home accommodation (C2)** is an important element of the suite of accommodation options for older Londoners and this should be recognised by boroughs and applicants. To meet the predicted increase in demand for care home beds to 2029, London needs to provide an average of 867 care home beds a year. The provision of Care Quality Commission rated Good or Outstanding care home beds is growing at around 3,525 bed-spaces a year in London and provision of dementia-capable bed spaces at a rate of 2,430 places a year. If the rates of supply and demand remain constant it should be possible to meet potential demand for both care home beds and dementia care home beds.

Table 4.3 - Annual borough benchmarks for specialist older persons housing 2017-2029

London Borough	Annual Benchmarks (units per annum)
Barking & Dagenham	70
Barnet	275
Bexley	145
Brent	230
Bromley	210
Camden	105
City of London	10
Croydon	225
Ealing	200
Enfield	195
Greenwich	105
Hackney	40
Hammersmith & Fulham	70
Haringey	110
Harrow	165
Havering	185
Hillingdon	180
Hounslow	135
Islington	60
Kensington & Chelsea	85
Kingston	105
Lambeth	70
Lewisham	100
Merton	105
Newham	85
Redbridge	155
Richmond	155
Southwark	65
Sutton	100
Tower Hamlets	45
Waltham Forest	110
Wandsworth	120
Westminster	100
Total	4,115

Policy H14 Gypsy and traveller accommodation

- A Boroughs should plan to meet the identified need for permanent gypsy and traveller pitches and must include ten-year pitch targets in their Development Plan Documents.
- B Boroughs that have not undertaken a needs assessment since 2008 should use the figure of need for gypsy and traveller accommodation provided in [Table 4.4](#) as identified need for pitches until a needs assessment is undertaken as part of their Development Plan review process.
- C Boroughs that have undertaken a needs assessment since 2008 should update this as part of their Development Plan review process.
- D Boroughs should undertake an audit of existing local authority provided gypsy and traveller sites and pitches, working with residents occupying these, identifying:
 - 1) areas of overcrowding
 - 2) areas of potential extra capacity within existing sites
 - 3) pitches in need of refurbishment and/or provision of enhanced infrastructure (including utilities, open space and landscaping).
- E Boroughs should plan to address issues identified in the audits.
- F Boroughs should actively plan to protect existing gypsy and traveller and Travelling Showpeople or circus people pitch or plot capacity, and this should be taken into account when considering new residential developments to ensure inclusive, balanced and cohesive communities are created.

- 4.14.1 Boroughs should **actively plan for gypsy and travellers' accommodation needs**, and should ensure that new sites are well-connected to social infrastructure, health care, education and public transport facilities, and contribute to a wider, inclusive neighbourhood.
- 4.14.2 The Mayor will initiate and lead a **London-wide gypsy and traveller accommodation needs assessment**, and will work to support boroughs in finding ways to make provision for gypsy and traveller accommodation. Until the findings of this new London-wide needs assessment are available for use in Development Plans boroughs should continue to plan to meet the need for permanent gypsy and traveller pitches in accordance with the requirements of [Policy H14 Gypsy and traveller accommodation](#), with a particular focus on Part B.

- 4.14.3 Insufficient pitch provision can lead to a rise in **unauthorised encampments**, with implications for the health and wellbeing of gypsy and travellers, community cohesion and costs for boroughs.
- 4.14.4 It is acknowledged that, in addition to permanent sites, suitable **short-term sites** are an important component of the suite of accommodation for gypsy and travellers. Research is currently underway to understand how a 'negotiated stopping' approach could work in London as a way of minimising the number of unauthorised encampments.
- 4.14.5 To assist boroughs in meeting identified need, **Mayoral funding** will be available through the Homes for Londoners Affordable Homes Programme for the provision of new pitches, on a single or multi-borough basis, and for refurbishment of existing pitches identified via an audit of existing pitches.
- 4.14.6 Where **new gypsy and traveller pitches** are proposed, the pitch and site layouts and the design of service blocks should be accessible and adaptable to ensure they are suitable for a range of users including disabled and older people, and families with young children.
- 4.14.7 If existing gypsy and traveller pitches or Travelling Showpeople's or circus people's sites or plots have to be **re-located or re-provided** within a borough, the new provision should take into account existing family or community groupings and avoid splitting these up wherever possible. Residents occupying pitches, sites or plots should be involved in the planning of any unavoidable re-locations to ensure satisfactory solutions are achieved, and replacement accommodation should be secured before relocation takes place.
- 4.14.8 The requirements of H14 are in addition to the duties under **section 124 of the Housing and Planning Act 2016**, which require local housing authorities to consider the needs of people residing in or resorting to their district with respect to the provision of both sites on which caravans can be stationed, or places on inland waterways where houseboats can be moored.

Table 4.4 - Need for gypsy and traveller pitches from London Boroughs' Gypsy and Traveller Accommodation Needs Assessment March 2008,⁷⁵ midpoint need figure 2007-2017

Borough	Need
Barking and Dagenham	8
Barnet	8
Bexley*	N/A
Brent	18
Bromley	74
Camden	4
City of London	0
Croydon	15
Ealing	38
Enfield	1
Greenwich	34
Hackney	24
Hammersmith and Fulham	3
Haringey	32
Harrow	8
Havering	20
Hillingdon	25
Hounslow	11
Islington	2
Kensington and Chelsea	9
Kingston upon Thames	10
Lambeth	7
Lewisham	12
Merton	10
Newham	15
Redbridge	11
Richmond upon Thames	9
Southwark	15
Sutton	11
Tower Hamlets	33
Waltham Forest	5
Wandsworth	7
Westminster	0

* London Borough of Bexley was excluded from the commissioning of this research and no survey work took place there.

⁷⁵ London Boroughs' Gypsy and Traveller Accommodation Needs Assessment, Forham Research, 2008: https://www.london.gov.uk/sites/default/files/london_boroughs_gypsy_and_traveller_accommodation_needs_assessment_-_final_report_-_2008_-_fordham_research.pdf

Policy H15 Purpose-built student accommodation

- A Boroughs should seek to ensure that local and strategic need for purpose-built student accommodation is addressed, provided that:
- 1) at the neighbourhood level, the development contributes to a mixed and inclusive neighbourhood
 - 2) the use of the accommodation is secured for students⁷⁶
 - 3) the majority of the bedrooms in the development including all of the affordable student accommodation bedrooms are secured through a nomination agreement for occupation by students of one or more higher education provider⁷⁷
 - 4) the maximum level of accommodation is secured as affordable student accommodation as defined through the London Plan and associated guidance:
 - a) to follow the Fast Track Route, at least 35 per cent of the accommodation must be secured as affordable student accommodation or 50 per cent where the development is on public land or industrial land appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution

⁷⁶ For the implementation of this policy a student is a person following a course in higher education as recognised by the Office for Students.

⁷⁷ A higher education provider is defined as an education institution that provides a designated course that has been approved by the Department for Education for higher education study which allows the student to apply for government-financed student loans. Higher education study is at qualification Level 4 or above (i.e. above A-level or equivalent). Further information on qualification levels can be found here: <https://www.gov.uk/what-different-qualification-levels-mean/list-of-qualification-levels>. The Office for Students provides a register listing all the English higher education providers that it officially recognises, which can be found at <https://www.officeforstudents.org.uk/advice-and-guidance/the-register/the-ofs-register/>. This register can be used to determine if a higher education provider delivers designated courses and thus satisfies the above definition. Further advice on higher education providers and designated courses can be obtained by contacting London Higher at enquiry@londonhigher.ac.uk

- b) where the requirements of 4a above are not met, applications must follow the Viability Tested Route set out in Policy H5 Threshold approach to applications, Part E
 - c) the affordable student accommodation bedrooms should be allocated by the higher education provider(s) that operates the accommodation, or has the nomination right to it, to students it considers most in need of the accommodation.
- 5) the accommodation provides adequate functional living space and layout.
- B Boroughs, student accommodation providers and higher education providers are encouraged to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes.

- 4.15.1 London's higher education providers make a significant contribution to its economy and labour market. It is important that their attractiveness and potential growth are not compromised by inadequate provision for new student accommodation. The housing need of students in London, whether in **Purpose-Built Student Accommodation (PBSA)** or shared conventional housing, is an element of the overall housing need for London determined in the 2017 London SHMA. London's overall housing need in the SHMA is expressed in terms of the number of conventional self-contained housing units. However, new flats, houses or bedrooms in PBSA all contribute to meeting London's housing need. The completion of new PBSA therefore contributes to meeting London's overall housing need and is not in addition to this need.
- 4.15.2 The **overall strategic requirement for PBSA** in London has been established through the work of the Mayor's Academic Forum, and a requirement for 3,500 PBSA bed spaces to be provided annually over the Plan period has been identified.⁷⁸ Meeting the requirement for PBSA should not undermine policy to secure mixed and inclusive neighbourhoods.
- 4.15.3 The strategic need for PBSA is not broken down into borough-level targets as the location of this need will vary over the Plan period with changes in higher education providers' estate and expansion plans, availability of appropriate

⁷⁸ Student population projections and accommodation need for new London Plan 2017 (amended October 2018) GLA

sites, and changes in Government policy that affect their growth and funding. To demonstrate that there is a need for a new PBSA development and ensure the accommodation will be supporting London's higher education providers, the student accommodation must either be operated directly by a higher education provider or the development must have an agreement in place from initial occupation with one or more higher education providers, to provide housing for its students, and to commit to having such an agreement for as long as the development is used for student accommodation. This agreement is known as a **nomination agreement**. A majority of the bedrooms in the development must be covered by these agreements. Therefore, the borough should ensure, through condition or legal agreement, that the development will, from the point of occupation, maintain a nomination agreement or enter a new nomination agreement with one or more higher education provider(s) for a majority of the bedrooms in the development, for as long as it is used as student accommodation. There is no requirement for the higher education provider linked by the agreement to the PBSA to be located within the borough where the development is proposed.

- 4.15.4 Where all the bedrooms in the PBSA development are provided at a rental cost that qualifies as affordable student accommodation as defined in paragraph [4.15.8](#) and maintained in perpetuity through legal agreement or condition, there is no requirement for it to have a nomination agreement with a higher education provider.
- 4.15.5 If the accommodation is not secured for use by students and secured through a nomination agreement for occupation by students of one or more higher educational providers as set out in paragraph [4.15.3](#) or is exempt from this requirement as set out in paragraph [4.15.4](#), it will not be considered as purpose-built student accommodation or meeting a need for purpose-built student accommodation; and the development proposal will normally be considered large-scale **purpose-built shared living** and be assessed by the requirements of [Policy H16 Large-scale purpose-built shared living](#).
- 4.15.6 PBSA should provide adequate functional living space and layout for the occupants. The **design** of the development must be high quality and in accordance with the requirements of [Policy D3 Optimising site capacity through the design-led approach](#).
- 4.15.7 To ensure students with an income equivalent to that provided to full-time UK students by state-funded sources of financial support for living costs can afford to stay in PBSA, the maximum number of bedrooms in PBSA are required to be affordable at this income level. The rental cost for this affordable student accommodation has been defined through the work of the

Mayor's Academic Forum.⁷⁹ In addition, the Mayor seeks the development of student accommodation which is affordable for the student body as a whole. Providers of PBSA are encouraged to develop models for delivery of PBSA in London which **minimise rental costs** for the majority of the bedrooms in the development and bring these rates nearer to the rate of affordable student accommodation.

- 4.15.8 The **definition of affordable student accommodation** is a PBSA bedroom that is provided at a rental cost for the academic year equal to or below 55 per cent of the maximum income that a new full-time student studying in London and living away from home could receive from the Government's maintenance loan for living costs for that academic year. The actual amount the Mayor defines as affordable student accommodation for the coming academic year is published in the Mayor's Annual Monitoring Report. Should the Government make significant changes to the operation of the maintenance loan for living costs as the main source of income available from the Government for higher education students, the Mayor will review the definition of affordable student accommodation and may provide updated guidance.
- 4.15.9 To provide greater certainty, speed up the planning process and increase the delivery of affordable student accommodation, a threshold has been introduced for PBSA schemes to take advantage of the Fast Track Route. To follow the **Fast Track Route** the amount of affordable student accommodation provided should be at least 35 per cent of student bedrooms in the development, or 50 per cent where required by Part B of [Policy H5 Threshold approach to applications](#). If the required threshold for affordable student accommodation is not met, a scheme will be considered under the **Viability Tested Route** in line with Part E of [Policy H5 Threshold approach to applications](#) and the Mayor's Affordable Housing and Viability SPG.
- 4.15.10 The affordable student accommodation should be equivalent to the non-affordable rooms in the development in terms of room sizes and room occupancy level. The **rent** charged must include all services and utilities which are offered as part of the package for an equivalent non-affordable room in the development. There should be no additional charges specific to the affordable accommodation.
- 4.15.11 The **initial annual rental cost** for the element of affordable accommodation should not exceed the level set out in the Mayor's Annual Monitoring Report for

⁷⁹ The Mayor's Academic Forum is composed of representatives from the boroughs, universities, private and voluntary sector accommodation providers and students, and is chaired and serviced by the GLA.

the relevant year. For following years, the rental cost for this accommodation can be linked to changes in a nationally-recognised index of inflation such as the Consumer Prices Index or CPIH.⁸⁰ A review period, such as every three years, could be set by the borough to allow for recalibrating the affordable student accommodation to the level stated as affordable in the Mayor's Annual Monitoring Report.

- 4.15.12 Where the development is not operated directly by a higher education provider, the affordable student accommodation bedrooms should be part of the PBSA that is subject to a nomination agreement. **Allocation** of affordable student accommodation should be by the higher education provider(s) which operates it or has the nomination right to it, and the provider(s) should allocate the rooms to students it considers most in need of the accommodation.
- 4.15.13 To enable providers of PBSA to maximise the delivery of affordable student accommodation by increasing the profitability of the development, boroughs should consider allowing the **temporary use of accommodation** during vacation periods for ancillary uses. Examples of such uses, amongst others, include providing accommodation for conference delegates, visitors, interns on university placements, and students on short-term education courses at any institution approved in advance by the borough. The temporary use should not disrupt the accommodation of the resident students during their academic year. Conditions and/or legal agreements could be attached to any planning permission to ensure that the ancillary use does not result in a material change of use of the building.
- 4.15.14 Where a PBSA development meets all the requirements of Part A, boroughs should not require on-site provision of, or a contribution towards, conventional Use Class C3 affordable housing.
- 4.15.15 In **monitoring** the implementation of this policy, particular regard will be given to the delivery of PBSA, the amount of affordable student accommodation provided, and the rental costs of the non-affordable rooms in PBSA developments.

⁸⁰ CPIH is a new additional measure of consumer price inflation including a measure of owner occupiers' housing costs, please see this webpage for further information: <https://www.ons.gov.uk/economy/inflationandpriceindices/qmis/consumerpriceinflationqmi>.

Policy H16 Large-scale purpose-built shared living

- A Large-scale purpose-built shared living development⁸¹ must meet the following criteria:
- 1) it is of good quality and design
 - 2) it contributes towards mixed and inclusive neighbourhoods
 - 3) it is located in an area well-connected to local services and employment by walking, cycling and public transport, and its design does not contribute to car dependency
 - 4) it is under single management
 - 5) its units are all for rent with minimum tenancy lengths of no less than three months
 - 6) communal facilities and services are provided that are sufficient to meet the requirements of the intended number of residents and offer at least:
 - a) convenient access to a communal kitchen
 - b) outside communal amenity space (roof terrace and/or garden)
 - c) internal communal amenity space (dining rooms, lounges)
 - d) laundry and drying facilities
 - e) a concierge
 - f) bedding and linen changing and/or room cleaning services.
 - 7) the private units provide adequate functional living space and layout, and are not self-contained homes or capable of being used as self-contained homes
 - 8) a management plan is provided with the application
 - 9) it delivers a cash in lieu contribution towards conventional C3 affordable housing. Boroughs should seek this contribution for the provision of new C3 off-site affordable housing as either an:
 - a) upfront cash in lieu payment to the local authority, or
 - b) in perpetuity annual payment to the local authority

⁸¹

Large-scale purpose-built shared living developments are sui generis

10) In both cases developments are expected to provide a contribution that is equivalent to 35 per cent of the units, or 50 per cent where the development is on public sector land or industrial land appropriate for residential uses in accordance with Policy E7 Industrial intensification, co-location and substitution, to be provided at a discount of 50 per cent of the market rent. All large-scale purpose-built shared living schemes will be subject to the Viability Tested Route set out in Policy H5 Threshold approach to applications, however, developments which provide a contribution equal to 35 per cent of the units at a discount of 50 per cent of the market rent will not be subject to a Late Stage Viability Review.

- 4.16.1 **Large-scale shared living developments** may provide a housing option for single person households who cannot or choose not to live in self-contained homes or HMOs. This policy is required to ensure that new purpose-built shared living developments are of acceptable quality, well-managed and integrated into their surroundings.
- 4.16.2 This policy applies to large-scale purpose-built shared living developments which in planning terms are **sui generis non-self-contained market housing**. These are not restricted to particular groups by occupation or specific need such as students, nurses or people requiring temporary or emergency accommodation proposed by speciality providers.
- 4.16.3 Large-scale purpose-built shared living developments are generally of at least 50 units. This type of accommodation is seen as providing an alternative to traditional flat shares and includes additional services and facilities, such as room cleaning, bed linen, on-site gym and concierge service. **Tenancies** should be for a minimum of three months to ensure large-scale purpose-built shared living developments do not effectively operate as a hostel.
- 4.16.4 A **management plan** must be produced and submitted with the planning application showing how the whole development will be managed and maintained to ensure the continued quality of the accommodation, communal facilities and services, and that it will positively integrate into the surrounding communities. The agreed management plan should be secured through a Section 106 agreement and should include, but not be limited to, detailed information on:
- a. security and fire safety procedures
 - b. move in and move out arrangements

- c. how all internal and external areas of the development will be maintained
- d. how communal spaces and private units will be cleaned and how linen changing services will operate
- e. how deliveries for servicing the development and residents' deliveries will be managed.

- 4.16.5 It is important within a large-scale purpose-built shared living development to **create a sense of community**. Buildings should be designed and managed in a way that lowers barriers to social interaction and encourages engagement between people:
- incidental meeting spaces should be provided in public and semi-public spaces within the building
 - communal kitchen spaces should be designed for social interaction, such as shared kitchens with cooking stations facing each other
 - amenity spaces should be of a size and quality that actively encourages their use and community engagement
 - where appropriate, entrance lobbies and public amenities such as restaurants and bars should encourage use by the surrounding local community as well as the internal community.
- 4.16.6 The private units should be appropriately sized to be comfortable and functional for a tenant's needs and may include facilities such as en-suite bathrooms and limited cooking facilities. There are currently no minimum space standards for communal and private areas of this type of accommodation. Given the generally small size of the private space in these developments, the **communal amenity spaces** are important elements in ensuring that the quality of the overall residential amenity is acceptable. If deemed necessary, the Mayor will produce planning guidance, including space standards, for this form of accommodation.
- 4.16.7 This form of accommodation is required to **contribute to affordable housing**. However, because it does not meet minimum housing space standards it is not considered suitable as a form of affordable housing itself. Therefore, a financial contribution is required for affordable housing provided through the borough's affordable housing programme.
- 4.16.8 A borough can decide whether it would prefer the **financial contribution** as a single upfront payment for affordable housing (Part A9a of [Policy H16 Large-scale purpose-built shared living](#)), which will be based on a 50 per cent discount to market value of 35 per cent of the units, or 50 per cent where the development is on public sector land or industrial land appropriate for residential uses in accordance with [Policy E7 Industrial intensification, co-location and](#)

substitution, or an ongoing in perpetuity payment linked to actual rental income (Part A9b of Policy H16 Large-scale purpose-built shared living). The ongoing payment should be based on 50 per cent of rental income for 35 per cent of units for as long as the development is used for this form of accommodation. Because of the immaturity of the market for this type of development, all large-scale purpose-built shared living developments will be assessed under the Viability Tested Route as set out in Policy H5 Threshold approach to applications. However, schemes which meet the relevant threshold will not be subject to a Late Stage Viability Review.

- 4.16.9 The **rental cost** of this form of accommodation is not directly comparable to the rental costs of conventional Use Class C3 housing, as shared living units are significantly smaller than the minimum housing space standard i.e. a one person dwelling of 37 sq.m.. Shared living tenants typically pay a room rate that includes utility costs and rent. If a comparison is undertaken it should be on a square metre rental rate, excluding utility costs, of the private accommodation and not a unit rental rate.

Chapter 5

Social Infrastructure



Policy S1 Developing London's social infrastructure

- A When preparing Development Plans, boroughs should ensure the social infrastructure needs of London's diverse communities are met, informed by a needs assessment of social infrastructure. Assessments should consider the need for cross-borough collaboration where appropriate and involve relevant stakeholders, including the local community.
- B In areas of major new development and regeneration, social infrastructure needs should be addressed via area-based planning such as Opportunity Area Planning Frameworks, Area Action Plans, Development Infrastructure Funding Studies, Neighbourhood Plans or master plans.
- C Development proposals that provide high quality, inclusive social infrastructure that addresses a local or strategic need and supports service delivery strategies should be supported.
- D Development proposals that seek to make best use of land, including the public-sector estate, should be encouraged and supported. This includes the co-location of different forms of social infrastructure and the rationalisation or sharing of facilities.
- E New facilities should be easily accessible by public transport, cycling and walking and should be encouraged in high streets and town centres.
- F Development proposals that would result in a loss of social infrastructure in an area of defined need as identified in the borough's social infrastructure needs assessment required under Part A should only be permitted where:
 - 1) there are realistic proposals for re-provision that continue to serve the needs of the neighbourhood and wider community, or;
 - 2) the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet future population needs or to sustain and improve services.
- G Redundant social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered, unless this loss is part of a wider public service transformation plan (see Part F2).

- 5.1.1 Social infrastructure covers a range of services and facilities that meet local and strategic needs and contribute towards a good quality of life. It includes **health provision, education, community, play, youth, early years, recreation, sports, faith, criminal justice and emergency facilities**. There are a wide variety of providers delivering these services, from large state-funded organisations, public and private institutions and specialist providers, to charitable trusts, the voluntary sector, community and faith groups, and individuals. Alongside more formal provision of services, there are informal networks and community support that play an important role in the lives of Londoners. This chapter primarily addresses the delivery of social infrastructure facilities. Many service providers may operate from or require other types of space, for example cultural facilities (addressed in [Chapter 7](#)) or offices (addressed in [Policy E1 Offices](#)). Green infrastructure in all its forms is also a key component of social infrastructure, and is addressed separately in [Chapter 8](#), [Policy G3 Metropolitan Open Land](#) and [Policy G4 Open space](#).
- 5.1.2 Social infrastructure plays an important role in developing **strong and inclusive communities**. It can provide opportunities to bring different groups of people together, contributing to social integration and the desirability of a place.
- 5.1.3 **Planning for social infrastructure** in London is complex. There are a wide range of providers and stakeholders and the degree of clarity around future provision and funding varies. It is therefore important that boroughs work collaboratively with service providers and other stakeholders, including the local community, to fully understand existing and future social infrastructure needs and plan appropriately for these, including through their infrastructure delivery plan and the Community Infrastructure Levy. This will also help facilitate an integrated approach to service delivery.
- 5.1.4 **Needs assessments** should be informed by both an understanding of the demographic make-up and socio-economic data required by [Policy D1 London's form, character and capacity for growth](#) as well as an audit of existing facilities and services. Supplementary Planning Guidance will be developed to inform this.
- 5.1.5 The **loss of social infrastructure** can have a detrimental effect on a community. Where possible, boroughs should protect such facilities and uses, and where a development proposal leads to the loss of a facility, require a replacement that continues to meet the needs of the neighbourhood it serves. A realistic proposal for replacement social infrastructure should be able to demonstrate funding, appropriate site availability and timely delivery of adequate facilities. To further protect against the loss of social infrastructure that is valued by a local community or group, boroughs should consider approving the designation

of a facility as an Asset of Community Value (ACV) if put forward by the local community.

- 5.1.6 In cases where social infrastructure premises may be deemed redundant and a replacement facility is no longer necessary or appropriate, **other forms of social infrastructure should be considered** for the site or part of the site to help meet other community needs, before alternative uses are pursued.
- 5.1.7 It is recognised that there will be cases where social infrastructure providers are undertaking an agreed programme of social infrastructure re-provision or **service reconfiguration**, such as has been seen within healthcare. Where social infrastructure premises are deemed redundant as part of this process, such losses may be acceptable in line with Parts D and F of [Policy S1 Developing London's social infrastructure](#) and [Policy S2 Health and social care facilities](#) and any related information or guidance to achieve the overall aims of the programme and to continue to meet the needs of Londoners.
- 5.1.8 In all cases, where housing is considered an appropriate alternative use, opportunities for **affordable housing provision** should be maximised.
- 5.1.9 Social infrastructure should be **easily accessible** by walking, cycling and public transport in accordance with the Healthy Streets Approach.
- 5.1.10 It is important to consider the way that social infrastructure integrates with other facilities and the way people who live or work in the area want to access it. **Shared use and co-location of facilities** should be encouraged, to align service provision, use land more efficiently and facilitate opportunities for different groups of people to come together, encouraging further inclusion and community participation. Shared use and co-location will help facilities and service providers work in a more coherent and joined-up way, and share maintenance and management costs. It could reduce the need to travel thereby improving accessibility. Examples of this include schools opening their facilities out of hours for use by the community, the co-location of health and sports facilities, or the co-location of facilities with housing to ensure effective usage.
- 5.1.11 Voluntary and community groups often find it difficult to find premises suitable for their needs. **Unused or underused facilities should be brought into use**, where possible, to help address these needs. The additional use or reuse of places of worship should be considered for providing accommodation for other traditions or faiths and/or wider community functions.

Policy S2 Health and social care facilities

- A Boroughs should work with Clinical Commissioning Groups (CCGs) and other NHS and community organisations to:
- 1) identify and address local health and social care needs within Development Plans, taking account of NHS Forward Planning documents and related commissioning and estate strategies, Joint Strategic Needs Assessments and Health and Wellbeing Strategies
 - 2) understand the impact and implications of service transformation plans and new models of care on current and future health infrastructure provision to maximise health and care outcomes
 - 3) undertake a needs assessment to inform Development Plans, including an audit of existing health and social care facilities. Needs should be assessed locally and sub-regionally, addressing borough and CCG cross-boundary issues
 - 4) identify sites in Development Plans for future provision, particularly in areas with significant growth and/or under provision and to address needs across borough boundaries
 - 5) identify opportunities to make better use of existing and proposed new infrastructure through integration, co-location or reconfiguration of services, and facilitate the release of surplus buildings and land for other uses.
- B Development proposals that support the provision of high-quality new and enhanced health and social care facilities to meet identified need and new models of care should be supported.
- C New facilities should be easily accessible by public transport, cycling and walking.

5.2.1 London's health care services are vital to maintaining and improving Londoners' quality of life. The health service is also one of the capital's major employers, with over 200,000⁸² people working in the NHS in London. Several factors

⁸² NHS Workforce Statistics, NHS, April 2018 <https://digital.nhs.uk/data-and-information/publications/statistical/nhs-workforce-statistics/nhs-workforce-statistics---april-2018>

affect the **demand for health services and facilities**. These include a growing and ageing population, an increase in complex and long-term health conditions that need an integrated approach, and changes in patients' personal preferences. New treatments and technologies are also transforming the ability to predict, diagnose and treat conditions. Policies throughout the Plan seek to support preventative health measures and contribute positively to the wider determinants of health. This policy facilitates this by supporting the integrated service delivery of health and social care facilities and services.

- 5.2.2 The NHS Long Term Plan⁸³ builds on the NHS Five Year Forward View, which identified the need to **prevent avoidable illness and transform the way that care is organised and delivered** to meet increasing demands for healthcare within the resources available. It describes the following priorities:
- increasing support for people to manage their own health better, for example through diabetes prevention and management and online therapies for common mental health problems
 - undertaking a higher proportion of healthcare in community rather than hospital settings
 - redesigning and reducing pressure on emergency hospital services establishing digitally-enabled primary and outpatient care across the NHS
 - making best use of available assets, including more flexible approaches to how facilities are used and the overall configuration of the health estate, which requires a mix of dis-investment in older, out-of-date facilities and re-investment in more modern, fit for purpose estate
 - ensuring that models of care change and continuously evolve
 - ensuring that existing and planned new health infrastructure supports and facilitates change.
- 5.2.3 There are currently four broad **types of health infrastructure provision**:
- primary care – GP practices, plus community pharmacists, dentists and opticians
 - community healthcare – this covers a wide range of diagnostic and healthcare services, including non-acute mental health services, which provide a means of delivering care closer to home than from a hospital setting
 - acute provision
 - specialist provision.

83

The NHS Long Term Plan (NHS England, January 2019)



- 5.2.4 **Sustainability and Transformation Plans** (STPs) were produced by the NHS and local Government in 2016 to set out how local health and care services would evolve and become sustainable by 2020/21. Five sub-regional STPs were developed in London. These five-year plans set out in varying levels of detail the proposed changes to NHS hospital estates and primary care facilities in each area. Local NHS organisations will increasingly focus on population health and partnerships with local authority-funded services through the development of new integrated care systems (ICSs) that will emerge from sustainability and transformation partnerships. ICSs will deliver the integration of primary and specialist care, physical and mental health services and health and social care.
- 5.2.5 Whilst there is no one-size-fits-all model of care, and an increasing blurring of the boundaries between primary, secondary (acute) and tertiary (specialist) health services, there are some broad underlying **principles that underpin the planning of new facilities** or changes to existing facilities. The NHS General Practice Forward View⁸⁴ and the NHS Long Term Plan support the provision of primary care at greater scale, with larger practices and/or more joined up networks of GPs offering a wider range of services to patients, including extended opening hours and widespread use of digital consultations. This means fewer GP practices serving larger patient catchments (perhaps 10-20,000 people per practice) and operating from larger premises than is the norm at present. Models of community healthcare are based around larger population catchments (50,000 or more people) or localities to ensure individual services are viable, and to maximise the benefits of integrating and/or co-locating services in community healthcare centres or hubs, or in more flexible ways across localities or networks of service providers.⁸⁵
- 5.2.6 In **assessing the need for new health and social care facilities**, consideration should be given to the location, scale and timing of new residential development, and the quality, capacity and accessibility of existing health and social care facilities to meet some or all growth. Joint Strategic Needs Assessments produced by local Health and Wellbeing Boards describe the current and future health and wellbeing needs of the local population and identify priorities for action which are set out in more detail in the Boards' Health and Wellbeing Strategies. These documents are valuable sources of evidence to inform the development and review of Development Plans.

⁸⁴ General Practice Forward View, NHS England, 2016, <https://www.england.nhs.uk/wp-content/uploads/2016/04/gpfv.pdf>

⁸⁵ Breaking down barriers to better health and care, NHS England, June 2018

- 5.2.7 Where population growth and change is taking place at modest levels, it may be possible to accommodate this through a combination of **efficiency savings, service reconfiguration and small adjustments in capacity**, for example through the conversion of non-clinical space to consulting or treatment rooms. In areas of high or concentrated population growth, particularly in Opportunity Areas, it is more likely that **new primary and community facilities or capacity will need to be provided**. Boroughs have a key role to play in ensuring that the need for health and social care facilities is assessed, that sufficient and appropriately-located sites are allocated for such facilities, and that mechanisms are in place to secure their provision through, for example, Section 106 or Community Infrastructure Levy contributions.
- 5.2.8 The **co-location of facilities with other uses**, such as other forms of social infrastructure or housing, is encouraged to use land more efficiently and to enable a more integrated service delivery.
- 5.2.9 Development and regeneration proposals for an area provide an opportunity to **re-think how land and buildings are used** and whether there is a more optimal configuration or use of that land. Hospital reconfigurations are an example where more intensive and better use of a site can lead to a combination of improved facilities and the creation and release of surplus land for other priorities. The London Estates Board aims to improve the way surplus and underused NHS assets are identified and released, and provide a single forum for estate discussions in London, ensuring early involvement of London Government partners. Membership includes NHS partners, local Government, the GLA and national partners (central Government, NHS England, One Public Estate and the national NHS property companies).

Policy S3 Education and childcare facilities

- A To ensure there is a sufficient supply of good quality education and childcare facilities to meet demand and offer educational choice, boroughs should:
- 1) prepare Development Plans that are informed by a needs assessment of education and childcare facility needs. Needs should be assessed locally and sub-regionally, addressing cross-boundary issues. Needs assessments should include an audit of existing facilities.

- 2) identify sites for future provision through the Development Plan process, particularly in areas with significant planned growth or need for school places (including Special Educational Needs and Disability places)
- 3) ensure that development proposals for housing and commercial facilities incorporate suitable childcare provision and encourage nursery provision within primary schools, where there is a need.

B Development proposals for education and childcare facilities should:

- 1) locate facilities in areas of identified need
- 2) locate facilities in accessible locations, with good public transport accessibility and access by walking and cycling
- 3) locate entrances and playgrounds away from busy roads, with traffic calming at entrances
- 4) link to existing footpath and cycle networks to create healthy routes to schools, and other education and childcare facilities, to enable all children to travel actively to school (walk, cycle or travel by public transport)
- 5) maximise the extended or multiple use of educational facilities for community or recreational use, through appropriate design measures
- 6) encourage the shared use of services between schools, colleges, universities, sports providers, and community facilities, and between early years and health and social care providers
- 7) ensure that new developments are accessible and inclusive for a range of users, including disabled people, by adopting an inclusive design approach
- 8) ensure that facilities incorporate suitable, accessible outdoor space
- 9) locate facilities next to parks or green spaces, where possible

C Development proposals should ensure that there is no net loss of education or childcare facilities, unless it can be demonstrated that there is no ongoing or future need. Any proposed loss of sport or recreation land (including playing fields) should be considered against the requirements of Part C of [Policy S5 Sports and recreation facilities](#).

- 5.3.1 **Access to high quality education and training** has a profound effect on people's life chances and is one of the most powerful ways to break down inequalities and improve social mobility. Every child, young person and adult should be given the best possible chance for success and be equipped to make the most of the economic opportunities the capital has to offer. High quality education and training provision, including the allocation of sufficient sites and the development of childcare facilities, schools, colleges and universities in appropriate places, will not only help to provide greater educational choice but will also improve skills, which is critical in tackling disadvantage. Good quality education and training are vital for supporting people into sustainable employment, which is also essential to London's continued economic success.
- 5.3.2 **Access to affordable, accessible and high-quality childcare** (pre-school and school age) provision can play a significant role in children's development and positively influence school-readiness, future educational attainment, economic participation and health. Universal, high-quality, early childhood education and care not only benefits the whole population but can particularly benefit children from the most disadvantaged backgrounds. As well as the positive benefit for children, it also helps to enable parents to go back to work.
- 5.3.3 It is estimated that an additional 100,000 **childcare places** will be needed between 2016-2041.⁸⁶ The Childcare Act 2006 places a duty on local authorities to ensure that there are enough childcare places to enable parents to work or train, and also to ensure that there are sufficient funded early education places for all three and four year-olds within the local authority area. In consultation with parents, the private, voluntary and independent sectors, and other key partners, boroughs should ensure the location and provision of a range of childcare services in different types of settings to meet the needs of local communities.
- 5.3.4 **Childcare facilities** should be safe, accessible for all, and provide both indoor and outdoor learning opportunities and should be provided within new housing and/or commercial developments where there is a need. Nurseries should be incorporated into new primary schools where appropriate.
- 5.3.5 There is a **growing need for school places** in London, with projected need for 705,000 mainstream state-funded primary school places required for the academic year 2018/19. This is an increase of 7,000 over the number of places required in 2016/17. The level of need is projected to fall to 686,000 places a year by 2027/28. In 2016/17, there was a need for 403,000 places in mainstream state-funded secondary schools. The number of places required is projected

⁸⁶

Demand for childcare in London – drivers and Projections, GLA, March 2018

to increase by 65,000, over the period to 2027/28.⁸⁷ This need, particularly for secondary school places, requires a strategic approach to delivery, making it harder to quantify within individual boroughs. Boroughs are encouraged to work together to meet the needs for secondary school places. Where possible, sites for schools should be allocated within Development Plans.

- 5.3.6 There is a need for an increase in **Special Educational Needs and Disability (SEND) provision** in London and it is important that these places are planned for. Some of this provision will be within mainstream schools and some within specialist schools. It is important that all schools are designed to be accessible and inclusive, meeting the highest standards of accessible and inclusive design (see [Policy D5 Inclusive design](#) and Area guidelines for SEND and alternative provision: BB104).⁸⁸
- 5.3.7 The **London Schools Atlas**⁸⁹ is an interactive map and dataset enabling users to view both existing patterns of schooling across the capital, and projections of future changes in the school age population. The Atlas is intended to be a resource for both parents and school place planners that supports collaborative working between providers in London.
- 5.3.8 **Higher education** in London provides an unparalleled choice of undergraduate and postgraduate degrees, continuing professional development, advanced research, and infrastructure to support business growth, such as incubation space and business support services. It is also a significant employer and attracts major international companies able to benefit from universities' research reputations, such as in pharmaceuticals and life sciences. Universities also play a vital part in ensuring Londoners have the higher order skills necessary to succeed in a changing economy, and for the capital to remain globally competitive. The Mayor has established a forum for higher education institutions and further education establishments to work with boroughs and other stakeholders to plan future developments, including student accommodation, in locations which are well-connected to public transport.
- 5.3.9 Access to **further education (FE)** plays a key role in skills development and life-long learning and assists with Londoners' progression into, and through, sustainable employment, including apprenticeships. There is a predicted increase in demand for FE provision, due to the growing number of 16-19 year-

⁸⁷ 2018 GLA School Place Demand Projections, GLA Intelligence Unit, 2018

⁸⁸ Department for Education and Education Funding Agency SEND and alternative provision: area guidelines, <https://www.gov.uk/government/publications/send-and-alternative-provision-area-guidelines>

⁸⁹ <https://maps.london.gov.uk/schools/>

olds, and the new requirement for all young people to remain in learning until they are 18. Meeting this growing demand will require strategic planning and working across boroughs. FE institutions also provide valuable community facilities and services. The Mayor will continue to support the enhancement of FE colleges and other training facilities through the Skills for Londoners Capital Fund.

- 5.3.10 The **design of education and childcare facilities** is critical to the creation of a good learning environment. Education and childcare facilities should be in locations that are easily accessible on foot, by cycling or using public transport. The design of entrances to schools and playgrounds is important in ensuring that children are encouraged to walk and cycle to the school gate and can do so safely. Facilities should be located away from busy roads, with traffic calming at entrances, to benefit from reduced levels of air pollution, noise and road danger. Where possible, natural features such as trees, greenery, forest schools and spaces for food growing should be incorporated into playgrounds and school sites, recognising both the health and educational benefits these can provide. Healthy and safe routes to education and childcare facilities, should be considered through the design process.
- 5.3.11 The Department for Education gives area guidelines for mainstream schools.⁹⁰ Accepting that these guidelines can sometimes be difficult to achieve in London, **innovative design solutions** should be considered in order to meet the needs of the school, including the provision of outdoor space.
- 5.3.12 School and college facilities – in particular sports, play, training and meeting facilities – should be capable of use by the wider community outside their main operating hours. They can provide venues for a range of community activities, including nurseries, children’s centres, cultural, youth and sports activities. Designing schools and colleges with this shared use in mind, and ensuring they are safe for a range of uses, also allows for more adaptability around changing work and lifestyle patterns, and extended childcare and holiday provision. Sharing of facilities such as sports pitches and multi-use games areas and locating schools next to parks and open spaces can also further encourage the **shared use of space**, particularly where space on a school or college site is limited. Education and childcare facilities could also be co-located with other uses such as housing and mixed-use developments at higher densities.

⁹⁰ Notes on area guidelines for mainstream schools: BB103, Education Funding Agency, 2015, <https://www.gov.uk/government/publications/mainstream-schools-area-guidelines/area-planning-for-maintained-schools>

Policy S4 Play and informal recreation

A Boroughs should:

- 1) prepare Development Plans that are informed by a needs assessment of children and young person's play and informal recreation facilities. Assessments should include an audit of existing play and informal recreation opportunities and the quantity, quality and accessibility of provision. Boroughs should consider the need for cross-borough collaboration where appropriate
- 2) produce strategies on play and informal recreation facilities and opportunities, supported by Development Plan policies, to address identified needs.

B Development proposals for schemes that are likely to be used by children and young people should:

- 1) increase opportunities for play and informal recreation and enable children and young people to be independently mobile
- 2) for residential developments, incorporate good-quality, accessible play provision for all ages. At least 10 square metres of playspace should be provided per child that:
 - a) provides a stimulating environment
 - b) can be accessed safely from the street by children and young people independently
 - c) forms an integral part of the surrounding neighbourhood
 - d) incorporates trees and/or other forms of greenery
 - e) is overlooked to enable passive surveillance
 - f) is not segregated by tenure
- 3) incorporate accessible routes for children and young people to existing play provision, schools and youth centres, within the local area, that enable them to play and move around their local neighbourhood safely and independently
- 4) for large-scale public realm developments, incorporate incidental play space to make the space more playable



- 5) not result in the net loss of play provision, unless it can be demonstrated that there is no ongoing or future demand. Where published, a borough's play and informal recreation strategy should be used to identify ongoing or future demand for play provision.

- 5.4.1 **Safe and stimulating play** is essential for children and young people's mental and physical health. It is not just an activity confined to playgrounds and play areas but is something that can be done in all aspects of a child's life, in a wide variety of locations and environments. Accessing a variety of opportunities for play and being able to be independently mobile within their neighbourhood, is important for children and young people's wellbeing and development. When preparing needs assessments, boroughs should consult with children and young people to ensure their needs are understood in terms of existing and future provision.
- 5.4.2 Many children and young people, however, find that there are limited opportunities for them to play in their local neighbourhood. This is often not because of a lack of formal play provision, but due to restrictive street design and layouts, poor links between spaces for play and recreation, and the threat of busy roads and traffic. Developments should **encourage children and young people to move around freely** through safe streets and footpath networks that connect to more formal play provision, green spaces and parks, and that follow the Healthy Streets Approach.
- 5.4.3 It should be recognised that children play in all sorts of spaces, including playgrounds, playing fields, skate parks and other recreation areas and this should generally be encouraged and taken account of in the design and layout of development. Where **formal play provision** is provided in new developments, it should be free, well-designed, accessible, inclusive and stimulating, and should balance the need to be safe whilst also providing an element of risk, which is important for children's development. It should integrate into the wider network of public open spaces and not be severed from the rest of a neighbourhood by physical barriers such as main roads. Play provision should be overlooked in some way to allow for a level of informal community supervision and generate a sense of safety and security. Integrating natural environments into play provision is encouraged, acknowledging the benefits to learning, and to help to support a green infrastructure network across the city.
- 5.4.4 There should be **appropriate provision for different age groups**, including older children and teenagers. Particular consideration should be given to

consultation with children and young people in the design of new provision to understand their changing needs. The needs of parents and carers should also be considered in the design of these spaces. Appropriate arrangements for management and maintenance of play and communal facilities should be provided. Youth facilities for young people should also be incorporated where possible to ensure that young people have suitable spaces to meet and play and feel welcome and included in developments and the public realm.

- 5.4.5 Formal play provision should normally be made **on-site** and provide at least 10 square metres per child to address child occupancy and play space requirements generated by a development proposal. Supplementary Planning Guidance will provide additional detail on the application of this benchmark and other implementation issues. Where development is to be phased, there should be an early implementation of play space.
- 5.4.6 **Off-site provision**, including the creation of new facilities or improvements to existing provision, secured by an appropriate financial contribution, may be acceptable where it can be demonstrated that it addresses the needs of the development whilst continuing to meet the needs of existing residents. This is likely to be more appropriate for the provision of play facilities for older children, who can travel further to access it, but should still usually be within 400 metres of the development and be accessible via a safe route from children's homes. Schools, school playing fields and other facilities can also provide an important contribution to play and informal recreation facilities and should be encouraged to allow community access to facilities out of hours.
- 5.4.7 Through the development of **play strategies**, boroughs should ensure the integration of play provision and child-friendly neighbourhoods into other borough strategies. Boroughs are encouraged to collaborate when developing strategies to ensure play spaces are provided in an integrated way and to help create child-friendly neighbourhoods across borough boundaries.

Policy S5 Sports and recreation facilities

- A To ensure there is sufficient supply of good quality sports and recreation facilities, boroughs should:
- 1) prepare Development Plans informed by a needs assessment for sports and recreation facilities. Needs should be assessed at the local and sub-regional level. Needs assessments should include an audit of existing facilities

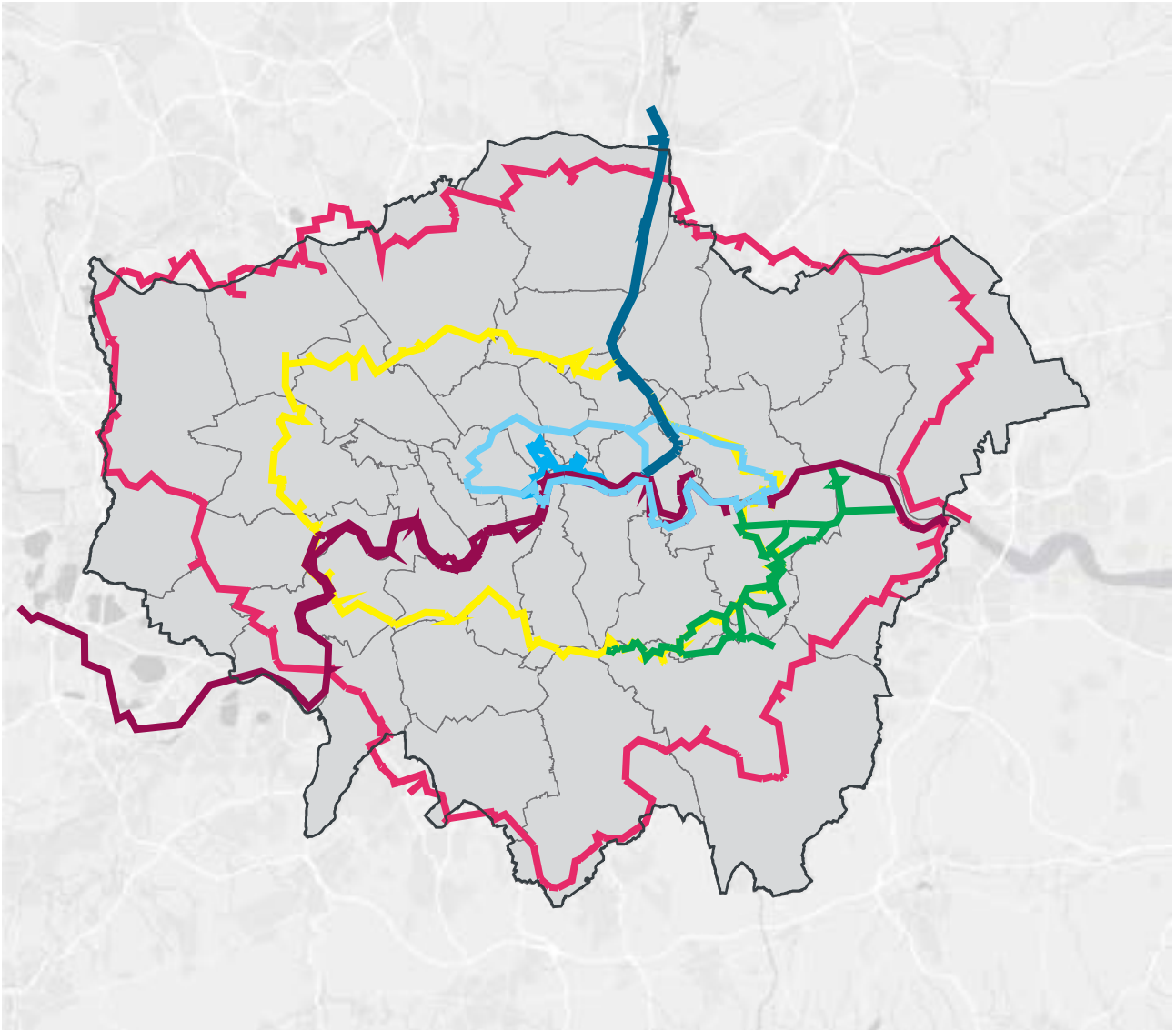


- 2) secure sites for a range of sports and recreation facilities in Development Plans, as justified by the needs assessment
 - 3) maintain, promote and enhance networks for walking, cycling and other activities including the Walk London Network shown on [Figure 5.1](#)
- B Development proposals for sports and recreation facilities should:
- 1) increase or enhance the provision of facilities in accessible locations, well-connected to public transport and link to networks for walking and cycling
 - 2) maximise the multiple use of facilities, and encourage the co-location of services between sports providers, schools, colleges, universities and other community facilities
 - 3) support the provision of sports lighting within reasonable hours, where there is an identified need for sports facilities, and lighting is required to increase their potential usage, unless the lighting gives rise to demonstrable harm to the local community or biodiversity.
- C Existing sports and recreational land (including playing fields) and facilities for sports and recreation should be retained unless:
- 1) an assessment has been undertaken which clearly shows the sports and recreational land or facilities to be surplus to requirements (for the existing or alternative sports and recreational provision) at the local and sub-regional level. Where published, a borough's assessment of need for sports and recreation facilities should inform this assessment; or
 - 2) the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or
 - 3) the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss of the current or former use.
- D Where facilities are proposed on existing open space, boroughs should consider these in light of policies on protecting open space ([Policy G2 London's Green Belt](#), [Policy G3 Metropolitan Open Land](#) and [Policy G4 Open space](#)) and the borough's own assessment of needs and opportunities for sports facilities, and the potential impact that the development will have.

- 5.5.1 Sport and recreation facilities are important components of social infrastructure. Both **formal and informal facilities** should be provided, to encourage physical activity and deliver a range of social, health and wellbeing benefits to communities. People take part in various forms of sport and recreation which require a number of different types of facility. Many activities require minimal facilities, and often an open space or community hall can be sufficient.
- 5.5.2 Current provision of swimming pools, artificial grass pitches (AGPs), and sports halls is not meeting demand.⁹¹ The need is most significant for AGPs where only 55 per cent of demand is currently being met. Swimming pools currently meet 93 per cent of total demand across London and sports halls meet 85 per cent of demand. For all types of facilities, the level of **unmet demand is projected to increase** by 2041 if no new facilities are provided. Increasing the catchment areas of existing facilities by improving public transport accessibility and access by walking and cycling, plus extending their opening hours, could increase their availability and potential number of users. Where new facilities are to be provided, they should be located in accessible locations, with the ability to maximise opening hours.
- 5.5.3 It is essential that boroughs **plan strategically for future provision** of these core sports facilities. Boroughs should assess the need for sport and recreation facilities to ensure appropriate levels of provision and help tackle inequality of access in London, particularly in areas or for groups with low participation. By their nature, sports facilities often form a part of open space, so sports and open space needs assessments should have regard to one another. Built sports facilities should only be accommodated on green open space if that area has been identified as surplus to requirements as per an open space strategy or the development is for alternative sports and recreation provision, the needs for which clearly outweigh the loss of green open space.
- 5.5.4 Up-to-date **playing pitch strategies** can be used to protect and enhance the use of existing playing fields and help to plan for where more are needed. Sport England provides guidance on the preparation of these strategies, which underscores the importance of a strategic approach to provision to take account of demand for facilities crossing borough boundaries, particularly in relation to specialist activities.
- 5.5.5 **Specialist sporting venues and stadiums** also have a role to play in providing facilities and enabling wider access to sport, as well as having an important cultural value.

⁹¹ Strategic Assessment of Need: Swimming Pools, Sports Halls and Artificial Grass Pitch provision in London 2017-2041 Facilities Planning Model, Sport England, July 2017

Figure 5.1 - Walk London Network



Walk London Network

- | | |
|---|---|
| ● Lea Valley Walk | ● Capital Ring |
| ● Jubilee Walk | ● Thames Path |
| ● Jubilee Greenway | ● London Loop |
| ● Green Chain | |

Source: Transport for London (TfL)

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

- 5.5.6 The **co-location** of sports facilities should be encouraged, particularly within new and existing schools, colleges, commercial schemes and community centres. This will help ensure the right mix of facilities in the right places to meet sporting demand and to increase participation.
- 5.5.7 **Lighting** can be important for the accessibility of outdoor sports facilities and can help to improve their use. The form of lighting required will depend on the facility and its use, but efforts should be made to minimise the impact on the surrounding areas, and not to cause a demonstrable harm to the local community or biodiversity. The hours of use of lighting should be agreed early in the process.
- 5.5.8 Places that are designed for people to be active and to move around freely will also encourage more physical activity in people’s daily lives. Existing networks, such as the **Walk London Network**, also help to encourage this further.

Policy S6 Public toilets

- A Large-scale developments⁹² that are open to the public, and large areas of public realm, should provide and secure the future management of:
- 1) free publicly-accessible toilets suitable for a range of users including disabled people, families with young children and people of all gender identities; and
 - 2) free ‘Changing Places’ toilets designed in accordance with the guidance in British Standard BS8300-2:2018.

These should be available during opening hours, or 24 hours a day where accessed from areas of public realm.

⁹² ‘Large-scale’ should be taken to mean developments that fall within Category 1B, Part 1 of The Town and Country Planning (Mayor of London) Order 2008, unless a development plan provides a local definition.

- 5.6.1 **Public toilets are a vital facility**, both for Londoners and visitors to the city. They are especially important for certain groups including disabled people, older people, people with babies and young children and pregnant women, as well as tourists and visitors who may be less familiar with their surroundings. Public toilets can support businesses in boosting customer footfall, by giving people

more confidence to move around the city and spend more time in a place or space, as well as helping to keep London clean.

- 5.6.2 Public toilets should be provided as part of large-scale developments that are open to the public, such as shops, sport, leisure and health care facilities, transport hubs, cultural and civic buildings and large areas of public realm. Boroughs should define 'large-scale' for their local circumstances. Where no local definition is given, 'large-scale' should be taken to mean developments that come under Category 1B, Part 1 of The Town and Country Planning (Mayor of London) Order 2008.
- 5.6.3 In **smaller developments**, and subject to local evidence and Development Plan policy, boroughs may secure access to toilet facilities as part of a community toilet scheme, or secure provision of public toilets through CIL or planning obligations.
- 5.6.4 Taking into account the needs of all Londoners, and to provide suitable levels of choice, **a range of toilet facilities** should be provided. They should include unisex disabled persons' toilets, separate accessible baby change/family toilets, and cubicles for people with ambulant mobility impairments which can also be suitable for some older people or people who require additional space. Further guidance on the provision and design of these facilities can be found in British Standard BS8300-2:2018 (Design of an accessible and inclusive built environment, Part 2: Buildings – Code of practice). Where gender-specific toilets are provided, a gender-neutral option should also be provided wherever possible (in addition to unisex disabled persons toilets). Consideration should be given to the capacity of facilities in order to minimise queuing, particularly where female gender-specific toilets are provided. Further guidance for determining the number of toilets needed in a location can be found in British Standard BS6465-4:2010 Sanitary installations Part 4: Code of practice for the provision of public toilets.
- 5.6.5 Public toilets which are **open 24 hours** can be of great benefit to people accessing London's night-time economy. These, whether permanent or temporary, should provide facilities which can be used by disabled people and people of all genders.
- 5.6.6 Public toilet facilities, whether provided inside buildings or externally, should be safe, well-lit and clean. Surveillance of entrances is an important consideration when planning facilities. Ongoing **management and cleaning** of facilities should be secured and agreed at the planning stage to ensure long-term provision is achievable.
- 5.6.7 Standard wheelchair accessible toilets do not meet the needs of all disabled people. People with profound and multiple impairments, learning disabilities, and

other impairments such as spinal injuries, muscular dystrophy, multiple sclerosis or acquired brain injury, often need extra facilities to allow them to use a toilet comfortably. **Changing Places toilets** are different to standard accessible toilets as they are designed for assisted use, are larger, and have additional features. Without Changing Places toilets many people are limited in terms of how long they can be away from home, or where they can go. The provision of Changing Places toilets can open up new areas and experiences for people with profound and multiple impairments, and their companions, removing the barrier that the lack of provision can create.

- 5.6.8 **Further guidance** on the design of Changing Places toilets can be found in British Standard BS8300-2:2018. Changing Places toilets are not designed for independent use and should be provided in addition to standard unisex disabled persons' toilets, baby change and family facilities, not as a substitution.

Policy S7 Burial space

- A When preparing Development Plans, boroughs should ensure provision is made for the different burial needs and requirements of London's communities, including for those groups for whom burial is the only option. This should be informed by a needs assessment of burial space, including an audit of existing provision and opportunities for the re-use of burial space. Cross-borough and/or sub-regional working is encouraged where appropriate to identify and address the requirements of these groups and to tackle burial space shortages within the sub-region.
- B Development proposals for new burial provision should be supported. This may include provision in one borough to assist faith groups from another borough that are facing burial space shortages. Development proposals resulting in the loss of burial provision should only be supported if it can be demonstrated that there is no ongoing or future demand.

- 5.7.1 In assessing the requirements for burial space, a borough's needs assessment should take account of the fact that different faith groups have **different needs for burial provision**. In London, the demand for burial space for particular faith groups is not always well matched with the availability of burial space. Some

boroughs have little or no burial space available.⁹³ For inner London boroughs, this requires them to seek provision in outer London or beyond. This can cause problems of access and cost which has a disproportionate effect on London's poorest communities. It also risks undermining community cohesion and social integration.

- 5.7.2 To address these issues, the principle of proximity is supported as a general rule to provide burial space near residents, reducing costs/travel time to visit burial sites. However, there may be cases where meeting the needs of residents in one borough may require burial provision to be located in another borough. This may require a **sub-regional collaborative approach** to the provision of burial space, which in turn should inform a borough's assessment of current cemetery demand and site allocations for cemeteries in their Development Plans. The use of cross-borough agreements for collaboration are encouraged.
- 5.7.3 The **re-use of graves** can provide some additional capacity. Both Section 74 of the Local Authorities Act 2007 and Section 25 of the Burial Act 1857 allow for the re-use of graves in certain circumstances and boroughs are encouraged to actively examine the potential that re-use offers them. The unique heritage and archaeological qualities of cemeteries should be taken into account when providing additional capacity in existing cemeteries.
- 5.7.4 Ensuring that community and cultural facilities and services required to meet local needs are planned for and provided is one of the core principles of the planning system. Evidence demonstrates that the **shortage of burial space** in London is reaching a critical stage in many boroughs.⁹⁴ Boroughs should therefore retain their existing provision, unless it can be demonstrated there is no ongoing or future demand. A borough's needs assessment should be used to inform this decision. The construction of new buildings in the Green Belt is inappropriate except for a limited number of uses. These include provision of appropriate facilities for cemeteries as long as they preserve the openness of the Green belt and do not conflict with the purposes of including land within it. This also applies to Metropolitan Open Land.

⁹³ An Audit of London Burial Provision – A report for the Greater London Authority by Julie Rugg and Nicholas Pleace, Cemetery Research Group University of York, 2011, available from <https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-technical-and-research-reports>

⁹⁴ An Audit of London Burial Provision – A report for the Greater London Authority by Julie Rugg and Nicholas Pleace, Cemetery Research Group University of York, 2011, available from <https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-technical-and-research-reports>

- 5.7.5 When making new provision, boroughs are encouraged to take into account the Mayor's broader aims for **green infrastructure and the natural environment**, including, but not limited to, the creation of new parks and open spaces, the enhancement of existing open spaces and natural environments, and the provision of enhanced links to London's green infrastructure. New burial provision that supports environmentally friendly burial practices such as woodland or parkland burial grounds can offer broad burial provision as well as wider public access. Amenity provision and environmental enhancements should be encouraged.
- 5.7.6 Boroughs should continue to make traditional burial provision but **innovative approaches** to the provision of community burial space, particularly in inner London, may also need to be taken. These could include creating public gardens for the burial of ashes on underused pockets of open land, parkland and brownfield land. Such gardens could also offer broader community utility, improved amenity provision and environmental enhancement.

Chapter 6

Economy



Policy E1 Offices

- A Improvements to the quality, flexibility and adaptability of office space of different sizes (for micro, small, medium-sized and larger enterprises) should be supported by new office provision, refurbishment and mixed-use development.
- B Increases in the current stock of offices should be supported in the locations in Parts C and D below.
- C The unique agglomerations and dynamic clusters of world city businesses and other specialist functions of the central London office market, including the CAZ, NIOD (Northern Isle of Dogs) and other nationally-significant office locations (such as Tech City and Kensington & Chelsea), should be developed and promoted. These should be supported by improvements to walking, cycling and public transport connectivity and capacity. Future potential reserve locations for CAZ-type office functions are identified at Stratford and Old Oak Common, capitalising on their current and potential public transport connectivity to central London, the UK and beyond.
- D The diverse office markets in outer and inner London (outside the areas identified in Part C) should be consolidated and – where viable – extended, focusing new development in town centres and other existing office clusters supported by improvements to walking, cycling and public transport connectivity and capacity including:
- 1) the strategic outer London office location at Croydon town centre
 - 2) other town centre office locations (having regard to the Town Centre Network office guidelines in [Table A1.1](#) and [Figure A1.4](#) in [Annex 1](#))
 - 3) existing urban business parks (such as Chiswick Park, Stockley Park and Bedfont Lakes), taking steps towards greater transport sustainability of these locations
 - 4) locally-oriented, town centre office provision to meet local needs.
- E Existing viable office floorspace capacity in locations outside the areas identified in Part C should be retained, supported by borough Article 4 Directions to remove permitted development rights where appropriate, facilitating the redevelopment, renewal and re-provision of office space where viable and releasing surplus office capacity to other uses.

- F Boroughs should consult upon and introduce Article 4 Directions to ensure that the CAZ, NIOD, Tech City, Kensington & Chelsea and geographically-defined parts of other existing and viable strategic and local office clusters (such as those in and around the CAZ, in town centres and other viable business locations – see Part D3 above) are not undermined by office to residential permitted development rights.
- G Development proposals related to new or existing offices should take into account the need for a range of suitable workspace including lower cost and affordable workspace.
- H The scope for the re-use of otherwise surplus large office spaces for smaller office units should be explored.
- I The redevelopment, intensification and change of use of surplus office space to other uses including housing is supported, subject to the provisions of Parts G and H.

- 6.1.1 London has a **diverse range of office markets**⁹⁵ with agglomerations of nationally and internationally significant office functions in the Central Activities Zone, Northern Isle of Dogs, Kensington & Chelsea and Tech City, complemented by strategic town centre office locations in inner and outer London and locally-oriented provision in other town centres across the whole of the capital.
- 6.1.2 The office market is going through a **period of restructuring** with increasing numbers of micro, small and medium-sized enterprises (SMEs), changing work styles supported by advances in technology, and new forms of accommodation such as flexible and co-working space.⁹⁶ Office employment projections suggest an increase of 619,300 jobs, from 1.98 million in 2016 to 2.60 million in 2041, a rise of 31 per cent.⁹⁷ This could translate into demand for between 4.7 and 6.1 million sq.m. of office floorspace over the period 2016 to 2041 ([Table 6.1](#)). It is important that the planning process does not compromise potential growth and so [Table 6.1](#) provides a broad monitoring benchmark which needs to be set against other drivers such as development trends, employment densities, rents, take-up and vacancy.

⁹⁵ Offices include uses falling within Use Class B1a and office-related B1b.

⁹⁶ London Office Policy Review, Ramidus Consulting, 2017; Supporting places of work: incubators, accelerators, co-working spaces, URS, Ramidus, #1Seed and Gort Scott, 2014

⁹⁷ Ramidus Consulting, 2017 op cit



Table 6.1 - Projected office employment and floorspace demand 2016-2041

Location	Office employment growth 2016-2041		Office floorspace demand 2016-2041
	Total	% of total growth	Gross Internal Area (million sq.m.)
Outer London	142,200	23%	0.3 – 1.5
CAZ and NIOD	367,700	59%	3.5
Inner London (outside CAZ+NIOD)	109,400	18%	1.0 – 1.1
London total	619,300	100%	4.7 – 6.1

Source: Ramidus Consulting, 2017 (Note: numbers may not sum due to rounding)

- 6.1.3 The projections indicate that the CAZ boroughs and some parts of **inner London** will continue to see growth in office employment and development of new office floorspace, driven by agglomeration economies, high value-added activities and viability of new space. There is broadly sufficient capacity to accommodate this demand in the CAZ and Northern Isle of Dogs complemented by Tech City and Kensington & Chelsea, although there are sub-markets within these areas where demand may exceed capacity.⁹⁸ Stratford and Old Oak Common are identified as potential future reserves for CAZ-related office capacity.
- 6.1.4 **Outer London** will see growth in office employment but the development of significant new office floorspace is anticipated to be focused in selected locations, particularly in west and south London (Figure A1.4) and where values are sufficient to make new office development viable. Office growth in these locations should be supported by improvements to walking, cycling and public transport connectivity and capacity.
- 6.1.5 It is important to ensure that there is sufficient space to support the growth of new start-up companies and to accommodate SMEs, including lower-cost and affordable business space. Development Plans and development proposals should support the provision of **space suitable for SMEs** in light of strategic and local assessments of demand and supply.

⁹⁸ London Employment Sites Database, CAG Consulting, 2017 and Ramidus 2017 op cit..

- 6.1.6 Outside the office to residential permitted development rights (PDR) exemption areas, more than 1.9 million sq.m. of office space had received prior approval to change to residential by March 2018⁹⁹ mostly, but not exclusively, in town centres in west and south London and in areas around the CAZ fringe. There are concerns that **office to residential PDR** is having disproportionate impacts on occupied office floorspace and on SMEs and that it could undermine the potential to deliver significantly more housing through more intensive forms of mixed-use development, particularly in town centres. This Plan therefore supports boroughs to consult upon and introduce Article 4 Directions for the areas currently exempted in and around the CAZ and for geographically-defined parts of other existing and viable strategic and local office locations, to ensure that their office functions are not undermined by office to residential PDR and to protect local amenity or the wellbeing of an area.
- 6.1.7 **Surplus office space** includes sites and/or premises where there is no reasonable prospect of these being used for business purposes. Evidence to demonstrate surplus office space should include strategic and local assessments of demand and supply, and evidence of vacancy and marketing (at market rates suitable for the type, use and size for at least 12 months, or greater if required by a local Development Plan Document). This evidence should be used to inform viability assessments.

Policy E2 Providing suitable business space

- A Boroughs should include policies in local Development Plan Documents that support the provision, and where appropriate, protection of a range of B Use Class business space, in terms of type, use and size, at an appropriate range of rents, to meet the needs of micro, small and medium-sized enterprises and to support firms wishing to start-up or expand.
- B Development of B Use Class business uses should ensure that the space is fit for purpose having regard to the type and use of the space.
- C Development proposals that involve the loss of existing B Use Class business space (including creative and artists' workspace) in areas identified in a local Development Plan Document where there is a shortage of lower-cost space or workspace of particular types, uses or sizes, should:

⁹⁹ London Development Database

- 1) demonstrate that there is no reasonable prospect of the site being used for business purposes, or
 - 2) ensure that an equivalent amount of B Use Class business space is re-provided in the proposal which is appropriate in terms of type, use and size, incorporating existing businesses where possible, and include affordable workspace where appropriate (see [Policy E3 Affordable workspace](#)).
- D Development proposals for new B Use Class business floorspace greater than 2,500 sq.m. (gross external area), or a locally determined lower threshold in a local Development Plan Document, should consider the scope to provide a proportion of flexible workspace or smaller units suitable for micro, small and medium-sized enterprises.

- 6.2.1 The provision of a **sufficient supply of business space of different types, uses and sizes** will ensure that workspace is available for occupation by SMEs and businesses wishing to start-up or expand. It will also help to ensure that workspace is available at an appropriate range of rents.
- 6.2.2 Development of business uses should ensure that the space is fit for purpose, with at least basic fit-out, and not compromised in terms of layout, street frontage, floor loading, floor to ceiling heights and servicing, having regard to the type and use of the space. This should take into account the varied operational and servicing requirements of different business uses.
- 6.2.3 Smaller occupiers and creative businesses are particularly vulnerable and sensitive to even small fluctuations in costs. To support a **diverse economy**, it is important that cost pressures do not squeeze out smaller businesses, particularly from fringe locations around central London, but also across the capital as a whole. There is evidence that the conversion of occupied or partially-occupied offices to residential use, through permitted development rights, is having a particular impact on secondary space in outer London and on the fringes of the CAZ.¹⁰⁰
- 6.2.4 **Low-cost business space** refers to secondary and tertiary space that is available at open market rents, which is of a lower specification than prime space,¹⁰¹ or found in non-prime locations such as back-of-town centre and

¹⁰⁰ Ramidus Consulting, 2017 op cit / London Development Database monitoring

¹⁰¹ See [Glossary](#) for definitions of [Prime, secondary and tertiary commercial property](#)

high street locations, railway arches, heritage buildings in the CAZ, and smaller-scale provision in industrial locations. It usually commands rents at or below the market average.

- 6.2.5 Part B of this policy is intended to operate in those parts of London where there is evidence in a local Development Plan Document of particular **shortages of business space** available for occupation, including lower-cost space. It supports the life-cycle of prime, secondary and tertiary business space over the longer term by securing the re-provision of capacity at open market rents and the provision of affordable workspace at rents maintained below the market rate where appropriate – (see [Policy E3 Affordable workspace](#)). It will be most effective in those parts of London where boroughs have removed office or light industrial to residential permitted development rights through Article 4 Directions.
- 6.2.6 Larger-scale commercial development proposals should consider the scope to incorporate a **range of sizes of business units**, including for SMEs. Flexible workspace can include a variety of types of space including serviced offices, co-working space¹⁰² and hybrid industrial space for B1c/B2/B8 uses. What constitutes a reasonable proportion of workspace suitable for SMEs should be determined on the circumstances of each case.
- 6.2.7 If business space is demonstrated to be obsolete or surplus to requirements (see paragraphs [6.1.7](#) and [6.7.5](#)), it should be **redeveloped for housing and other uses**.

Policy E3 Affordable workspace

- A In defined circumstances set out in Parts B and C below, planning obligations may be used to secure affordable workspace (in the B Use Class) at rents maintained below the market rate for that space for a specific social, cultural or economic development purpose such as:
- 1) for specific sectors that have social value such as charities, voluntary and community organisations or social enterprises
 - 2) for specific sectors that have cultural value such as creative and artists' workspace, rehearsal and performance space and makerspace
 - 3) for disadvantaged groups starting up in any sector



- 4) supporting educational outcomes through connections to schools, colleges or higher education
 - 5) supporting start-up and early stage businesses or regeneration.
- B Consideration should be given to the need for affordable workspace for the purposes in Part A above:
- 1) where there is affordable workspace on-site currently, or has been at any time since 1 December 2017, except where it is demonstrated that the affordable workspace has been provided on a temporary basis pending redevelopment of the site
 - 2) in areas identified in a local Development Plan Document where cost pressures could lead to the loss of affordable or low-cost workspace for micro, small and medium-sized enterprises (such as in the City Fringe around the CAZ and in Creative Enterprise Zones)
 - 3) in locations identified in a local Development Plan Document where the provision of affordable workspace would be necessary or desirable to sustain a mix of business or cultural uses which contribute to the character of an area.
- C Boroughs, in their Development Plans, should consider detailed affordable workspace policies in light of local evidence of need and viability. These may include policies on site-specific locations or defining areas of need for certain kinds of affordable workspace.
- D Affordable workspace policies defined in Development Plans and the terms set out in Section 106 agreements should ensure that the objectives in Part A above are monitored and achieved, including evidence that the space will be managed by a workspace provider with a long-term commitment to maintaining the agreed or intended social, cultural or economic impact. Applicants are encouraged to engage with workspace providers at an early stage in the planning process to ensure that the space is configured and managed efficiently.
- E Leases or transfers of space to workspace providers should be at rates that allow providers to manage effective workspace with sub-market rents, meeting the objectives in Part A, over the long-term.

- 6.3.1 It is important that London continues to **generate a wide range of economic and other opportunities**, to ensure that London is a fairer, more inclusive and more equal city. The cost of workspace in London is particularly high relative to other parts of the UK and to ensure that all types of development needed to support the economy can be accommodated there is a need for affordable workspace for some economic, social and cultural uses that cannot afford to operate at open market rents and to support start-up or early stage businesses.
- 6.3.2 Affordable workspace is defined here as workspace that is provided at **rents maintained below the market rate** for that space **for a specific social, cultural, or economic development purpose**. It can be provided and/or managed directly by a dedicated workspace provider, a public, private, charitable or other supporting body; through grant and management arrangements (for example through land trusts); and/or secured in perpetuity or for a period of at least 15 years by planning or other agreements.
- 6.3.3 Affordable workspace may **help support educational outcomes**, for example by businesses providing apprenticeships and work experience, offering mentoring by entrepreneurs and/or providing space for further and higher education leavers to develop academic work into businesses. It may also be linked with business support and skills training.
- 6.3.4 As well as ensuring a sufficient supply of affordable business space, the Mayor also wishes to support sectors that have **cultural or social value** such as artists, designer-makers, charities, voluntary and community organisations and social enterprises for which low-cost space can be important. Therefore, in certain specific circumstances, as set out in Part A, there may be a need to secure affordable workspace as part of new development.
- 6.3.5 Social, cultural, or economic development objectives can be set in **planning obligations**, or by ensuring workspace providers are on a Local Authority framework panel or accredited list. Arrangements for engaging a provider, how the space will be owned or leased and the process for review, changes in terms, disposal or termination, should be agreed with the Local Planning Authority. When drawing up local Development Plan policies, boroughs are encouraged to draw on the experience of local workspace providers to understand the nature of demand in an area. Planning obligations used to secure affordable workspace in mixed use schemes should include mechanisms to ensure its timely delivery. It may be appropriate to require this in advance of some or all residential elements being occupied.
- 6.3.6 Landowners sometimes provide affordable workspace on a voluntary and temporary basis prior to the redevelopment of a site. This provision makes good use of sites that may otherwise remain vacant. The **temporary use** of

a site should generally be secured through a temporary planning permission and must not result in an unacceptable impact on residential amenity or prevent development sites from being brought forward for development in a timely fashion. Parameters for any temporary use, particularly its longevity and associated obligations, should be established from the outset and agreed by all parties.

- 6.3.7 The Mayor will encourage the delivery of new workspace for **SMEs, the creative industries, artists and the fashion industry** within new residential and mixed-use developments. He will also provide assistance to artists and creative businesses through the Mayor’s Creative Enterprise Zones (see [Policy HC5 Supporting London’s culture and creative industries](#)) and promote schemes that provide linked affordable housing and affordable workspace in new housing developments.

Policy E4 Land for industry, logistics and services to support London’s economic function

- A A sufficient supply of land and premises in different parts of London to meet current and future demands for industrial and related functions should be provided and maintained, taking into account strategic and local employment land reviews, industrial land audits and the potential for intensification, co-location and substitution (see [Policy E7 Industrial intensification, co-location and substitution](#)). This should make provision for the varied operational requirements of:
- 1) light and general industry (Use Classes B1c and B2)
 - 2) storage and logistics/distribution (Use Class B8) including ‘last mile’ distribution close to central London and the Northern Isle of Dogs, consolidation centres and collection points
 - 3) secondary materials, waste management and aggregates
 - 4) utilities infrastructure (such as energy and water)
 - 5) land for sustainable transport functions including intermodal freight interchanges, rail and bus infrastructure
 - 6) wholesale markets
 - 7) emerging industrial-related sectors

- 8) flexible (B1c/B2/B8) hybrid space to accommodate services that support the wider London economy and population
 - 9) low-cost industrial and related space for micro, small and medium-sized enterprises (see also [Policy E2 Providing suitable business space](#))
 - 10) research and development of industrial and related products or processes (falling within Use Class B1b).
- B London's land and premises for industry, logistics and services falls into three categories:
- 1) Strategic Industrial Locations (SIL) – see [Policy E5 Strategic Industrial Locations \(SIL\)](#)
 - 2) Locally Significant Industrial Sites (LSIS) - see [Policy E6 Locally Significant Industrial Sites](#)
 - 3) Non-Designated Industrial Sites¹⁰³ - see Part C of [Policy E7 Industrial intensification, co-location and substitution](#).
- C The retention, enhancement and provision of additional industrial capacity across the three categories of industrial land set out in Part B should be planned, monitored and managed. Any release of industrial land in order to manage issues of long-term vacancy and to achieve wider planning objectives, including the delivery of strategic infrastructure, should be facilitated through the processes of industrial intensification, co-location and substitution set out in [Policy E7 Industrial intensification, co-location and substitution](#) and supported by [Policy E5 Strategic Industrial Locations \(SIL\)](#).
- D The retention, enhancement and provision of additional industrial capacity should be prioritised in locations that:
- 1) are accessible to the strategic road network and/or have potential for the transport of goods by rail and/or water transport
 - 2) provide capacity for logistics, waste management, emerging industrial sectors or essential industrial-related services that support London's economy and population
 - 3) provide capacity for micro, small and medium-sized enterprises

103

Sites containing industrial and related functions that are not formally designated as SIL or LSIS in a Local Plan

- 4) are suitable for 'last mile' distribution services to support large-scale residential or mixed-use developments subject to existing provision
- 5) support access to supply chains and local employment in industrial and related activities.

- E Any release of industrial capacity in line with Part C should be focused in locations that are (or are planned to be) well-connected by public transport, walking and cycling and contribute to other planning priorities including housing (and particularly affordable housing), schools and other infrastructure.
- F Efficient wholesale market functions should be retained to meet London's requirements whilst enabling opportunities to consolidate composite wholesale markets to meet long-term wholesaling needs.
- G Boroughs should ensure that the need to retain sufficient industrial and logistics capacity is not undermined by permitted development rights by introducing Article 4 Directions where appropriate.

- 6.4.1 London depends on a **wide range of industrial, logistics and related uses** that are essential to the functioning of its economy and for servicing the needs of its growing population, as well as contributing towards employment opportunities for Londoners. This includes a diverse range of activities such as food and drink preparation, creative industry production and maker spaces, vehicle maintenance and repair, building trades, construction, waste management including recycling, transport functions, utilities infrastructure, emerging activities (such as data centres, renewable energy generation and clean technology) and an efficient storage and distribution system which can respond to business and consumer demands¹⁰⁴.
- 6.4.2 **Wholesale markets** have historically played an important role in London's economy distributing fresh products to retailers, restaurants and street markets across the capital. Their future role is affected by competition from alternative distribution systems but they are also taking advantage of trends towards increased eating out and are supplying a range of products to London's diverse communities. This Plan continues to recognise their role whilst enabling

¹⁰⁴ Keep London Working, SEGRO, 2017, http://www.segro.com/media/keeplondonworking?sc_lang=en; Industrial Revolution, Turley, 2017, <https://www.turley.co.uk/comment/industrial-revolution>

opportunities to consolidate composite wholesale markets to meet long-term wholesaling needs.

- 6.4.3 **Industrial land and floorspace** provides the capacity for the activities described above to operate effectively. In 2015, London had an estimated 6,976 hectares¹⁰⁵ of land in industrial and related uses of which about 50 per cent was within SILs, a further 14 per cent was in LSIS designated by boroughs and the remaining 36 per cent was in Non-Designated Industrial Sites which are not designated in Local Plan policies maps.
- 6.4.4 Over the period 2001 to 2015, more than 1,300 hectares of industrial land (including SILs, LSIS and Non-Designated Industrial Sites) was released **to other uses**. This was well in excess of previously established London Plan monitoring benchmarks.¹⁰⁶ Research for the GLA indicates that there will be positive net demand for industrial land in London over the period 2016 to 2041¹⁰⁷, mostly driven by strong demand for logistics to service growth in London's economy and population. The GLA's assessment indicates that after factoring in both the positive net land demands and the management of vacancy rates, there would be scope to release a further 233 hectares of industrial land over the period 2016 to 2041. However, the demand assessment shows that in 2015, 185 hectares of industrial land already had planning permission to change to non-industrial use and a further 653 hectares were earmarked for potential release in Opportunity Area Planning Frameworks, Local Plans and Housing Zones.
- 6.4.5 Based upon this evidence, this Plan addresses the need to provide sufficient industrial, logistics and related capacity through its policies.
- 6.4.6 Where possible, all Boroughs should seek to deliver intensified floorspace capacity in either existing and/or new appropriate locations supported by appropriate evidence.
- 6.4.7 All boroughs in the Central Services Area should recognise the need to provide essential services to the CAZ and Northern Isle of Dogs and in particular sustainable 'last mile' distribution/ logistics, 'just-in-time' servicing (such as food service activities, printing, administrative and support services, office supplies, repair and maintenance), waste management and recycling, and land to support transport functions. This should be taken into account when assessing whether substitution is appropriate.

¹⁰⁵ London Industrial Land Supply and Economy Study, AECOM, 2016

¹⁰⁶ AECOM, 2016 op. cit.

¹⁰⁷ London Industrial Land Demand Study, CAG Consultants, 2017



- 6.4.8 Where industrial land vacancy rates are currently above the London average, boroughs are encouraged to assess whether the release of industrial land for alternative uses is more appropriate if demand cannot support industrial uses in these locations. Boroughs proposing changes through a Local Plan to Green Belt or MOL boundaries (in line with [Policy G2 London's Green Belt](#) and [Policy G3 Metropolitan Open Land](#)) to accommodate their London Plan housing target should demonstrate that they have made as much use as possible of suitable brownfield sites and underutilised land, including – in exceptional circumstances – appropriate industrial land in active employment use. Where possible, a substitution approach to alternative locations with higher demand for industrial uses is encouraged.

Policy E5 Strategic Industrial Locations (SIL)

- A Strategic Industrial Locations (identified in [Figure 6.1](#) and [Table 6.2](#)) should be managed proactively through a plan-led process to sustain them as London's largest concentrations of industrial, logistics and related capacity for uses that support the functioning of London's economy.
- B Boroughs, in their Development Plans, should:
- 1) define the detailed boundary of SILs in policies maps having regard to the scope for intensification, co-location and substitution (set out in [Policy E7 Industrial intensification, co-location and substitution](#))
 - 2) develop local policies to protect and intensify the function of SILs and enhance their attractiveness and competitiveness (including improvements to access, public transport, digital connectivity and other related infrastructure) for the functions set out in Part A of [Policy E4 Land for industry, logistics and services to support London's economic function](#)
 - 3) explore opportunities to intensify and make more efficient use of land in SILs in Development Plan reviews and through Opportunity Area Planning Frameworks in collaboration with the GLA and other planning authorities within and outside London ([Policy E7 Industrial intensification, co-location and substitution](#)).
 - 4) strategically coordinate Development Plans to identify opportunities to substitute industrial capacity and function of Strategic Industrial Locations where evidence that alternative, more suitable, locations



exist. This release must be carried out through a planning framework or Development Plan Document review process and adopted as policy in a Development Plan. All Boroughs are encouraged to evaluate viable opportunities to provide additional industrial land in new locations to support this process. This policy should be applied in the context of Policy E7 Industrial intensification, co-location and substitution.

- C Development proposals in SILs should be supported where the uses proposed fall within the industrial-type activities set out in Part A of Policy E4 Land for industry, logistics and services to support London’s economic function
- D Development proposals within or adjacent to SILs should not compromise the integrity or effectiveness of these locations in accommodating industrial-type activities and their ability to operate on a 24-hour basis. Residential development adjacent to SILs should be designed to ensure that existing or potential industrial activities in SIL are not compromised or curtailed. Particular attention should be given to layouts, access, orientation, servicing, public realm, air quality, soundproofing and other design mitigation in the residential development.

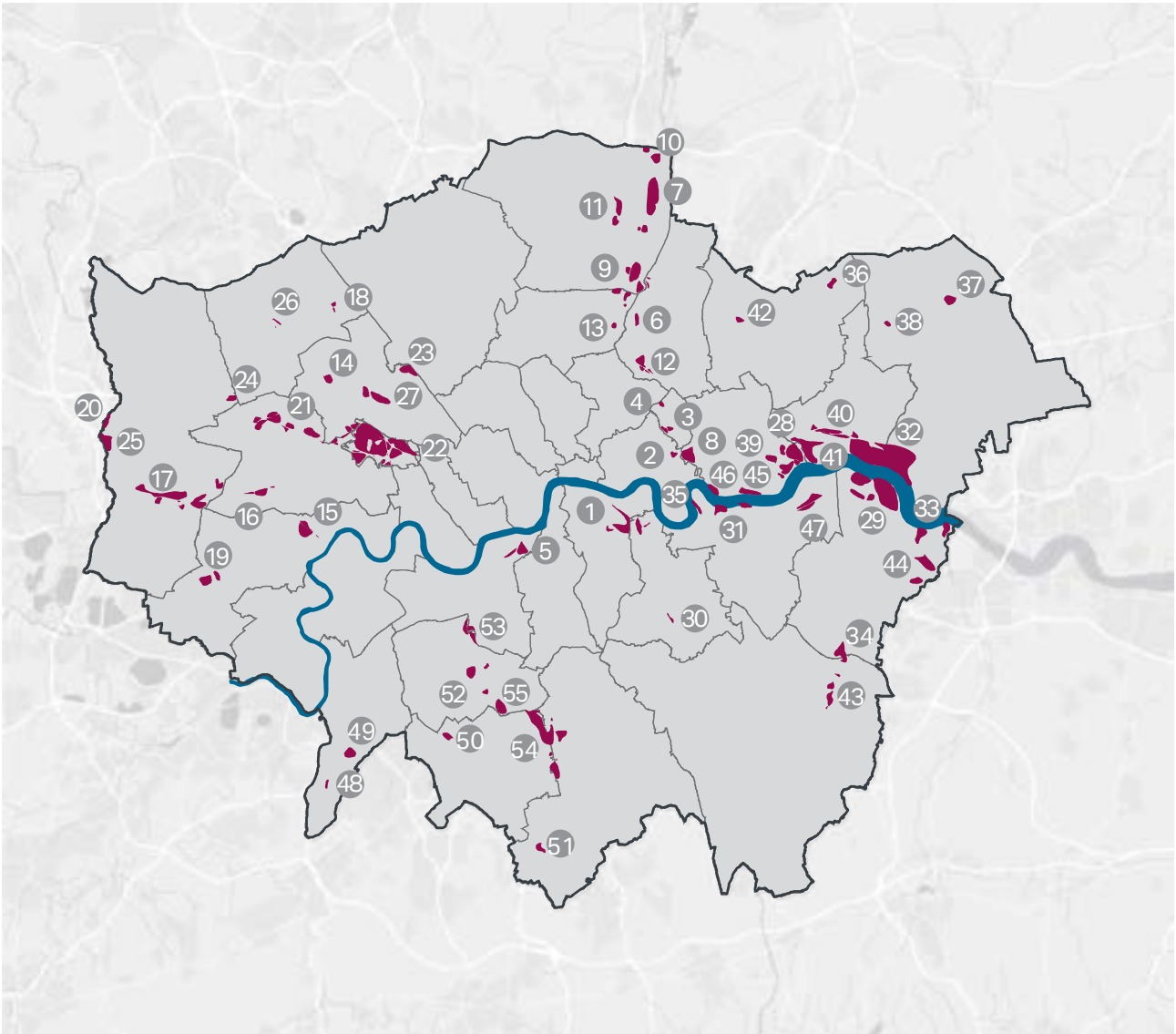
- 6.5.1 London’s SILs, listed in Table 6.2 and illustrated in Figure 6.1, are the capital’s main reservoir of land for industrial, logistics and related uses. **SILs are given strategic protection** because they are critical to the effective functioning of London’s economy. They can accommodate activities which - by virtue of their scale, noise, odours, dust, emissions, hours of operation and/or vehicular movements - can raise tensions with other land uses, particularly residential development.
- 6.5.2 SILs are important in supporting strategic logistics operations serving the capital as well as providing relatively low-cost industrial space for SMEs. Typically, they are located close to the strategic road network and many are also well-located with respect to rail, river, canals and safeguarded wharves which can support the sustainable movement of goods, construction materials and waste to, from and within London. To ensure that London can retain an efficient logistics function it is particularly important to **secure and enhance strategic provision in SILs** in west London, especially at Park Royal and around Heathrow; in north London in the Upper Lee Valley; in east London, north and south of the Thames; and in the Wandle Valley in south London. This should be



complemented by smaller-scale provision in LSIS and Non-Designated Industrial Sites including sustainable 'last mile' distribution close to central London.

- 6.5.3 **Innovations** to make more effective use of land in SILs are encouraged and should be explored in Local Plan reviews and Opportunity Area Planning Frameworks. This includes collaborative working with other planning authorities in the relevant property market areas including authorities in the Wider South East (see also [Policy E7 Industrial intensification, co-location and substitution](#)). This should take into account the potential to rationalise areas of SIL that are currently in non-industrial and related uses or contain transport or utilities uses which are surplus to requirements. The Thames Gateway provides the greatest scope for strategically co-ordinated plan-led consolidation of SILs in order to manage down overall vacancy rates, particularly in the boroughs of Newham and Barking & Dagenham.

Figure 6.1 - Strategic Industrial Locations



Strategic Industrial Locations

● Strategic Industrial Locations (SIL)

References refer to Table 6.2

Source: GLA Planning

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

Table 6.2 - Strategic Industrial Locations

Ref.	Location	Industrial Property Market Area	Planning Authority
1	Bermondsey / Old Kent Road / Surrey Canal Area	Central Services Area	Southwark / Lewisham
2	Empson Street	Central Services Area	Tower Hamlets
3	Fish Island / Marshgate Lane	Central Services Area	LLDC (Newham/ Tower Hamlets)
4	Hackney Wick	Central Services Area	LLDC (Hackney)
5	Queenstown Road, Battersea	Central Services Area	Wandsworth
6	Blackhorse Lane	Lee Valley	Waltham Forest
7	Brimsdown	Lee Valley	Enfield
8	British Gas Site / Cody Road	Lee Valley	Newham
9	Central Leaside Business Area	Lee Valley	Enfield / Haringey / Waltham Forest
10	Freezywater / Innova Park	Lee Valley	Enfield
11	Great Cambridge Road	Lee Valley	Enfield
12	Lea Bridge Gateway	Lee Valley	Waltham Forest
13	Tottenham Hale	Lee Valley	Haringey
14	East Lane	Park Royal / Heathrow	Brent
15	Great West Road / Brentford – Transport Avenue	Park Royal / Heathrow	Hounslow
16	Great Western	Park Royal / Heathrow	Ealing
17	Hayes Industrial Area	Park Royal / Heathrow	Hillingdon
18	Honeypot Lane, Stanmore	Park Royal / Heathrow	Harrow
19	North Feltham Trading Estate	Park Royal / Heathrow	Hounslow
20	North Uxbridge Industrial Estate	Park Royal / Heathrow	Hillingdon
21	Northolt, Greenford, Perivale	Park Royal / Heathrow	Ealing
22	Park Royal	Park Royal / Heathrow	OPDC (Brent / Ealing / Hammersmith & Fulham)

Ref.	Location	Industrial Property Market Area	Planning Authority
23	Staples Corner	Park Royal / Heathrow	Brent
24	Stonefield Way / Victoria Road	Park Royal / Heathrow	Hillingdon
25	Uxbridge Industrial Estate	Park Royal / Heathrow	Hillingdon
26	Wealdstone Industrial Area	Park Royal / Heathrow	Harrow
27	Wembley	Park Royal / Heathrow	Brent
28	Beckton Riverside	Thames Gateway	Newham
29	Belvedere Industrial Area	Thames Gateway	Bexley
30	Bromley Road	Thames Gateway	Lewisham
31	Charlton Riverside	Thames Gateway	Greenwich
32	Dagenham Dock / Rainham Employment Area	Thames Gateway	Barking & Dagenham / Havering
33	Erith Riverside	Thames Gateway	Bexley
34	Foots Cray Business Area	Thames Gateway	Bexley / Bromley
35	Greenwich Peninsula West	Thames Gateway	Greenwich
36	Hainault Industrial Estate	Thames Gateway	Redbridge
37	Harold Hill Industrial Estate	Thames Gateway	Havering
38	King George Close Estate, Romford	Thames Gateway	Havering
39	London Industrial Park	Thames Gateway	Newham
40	Rippleside	Thames Gateway	Barking & Dagenham
41	River Road Employment Area	Thames Gateway	Barking & Dagenham
42	Southend Road Business Area	Thames Gateway	Redbridge
43	St Mary Cray	Thames Gateway	Bromley
44	Thames Road, including Crayford Industrial Area	Thames Gateway	Bexley
45	Thameside East	Thames Gateway	Newham
46	Thameside West	Thames Gateway	Newham
47	West Thamesmead / Plumstead Industrial Area (including White Hart Triangle)	Thames Gateway	Greenwich
48	Barwell Business Park	Wandle Valley	Kingston
49	Chessington Industrial Estate	Wandle Valley	Kingston
50	Kimpton Industrial Area	Wandle Valley	Sutton
51	Marlpit Lane	Wandle Valley	Croydon
52	Morden Road Factory Estate and Prince George's Road	Wandle Valley	Merton



Ref.	Location	Industrial Property Market Area	Planning Authority
53	North Wimbledon / Garrett Business Park (Summerstown)	Wandle Valley	Merton / Wandsworth
54	Purley Way and Beddington Lane Industrial Area	Wandle Valley	Croydon / Sutton
55	Willow Lane, Beddington and Hallowfield Way	Wandle Valley	Merton

Policy E6 Locally Significant Industrial Sites

- A In their Development Plans, boroughs should:
- 1) designate and define detailed boundaries and policies for Locally Significant Industrial Sites (LSIS) in policies maps justified by evidence in local employment land reviews taking into account the scope for intensification, co-location and substitution (set out in [Policy E7 Industrial intensification, co-location and substitution](#))
 - 2) make clear the range of industrial and related uses that are acceptable in LSIS including, where appropriate, hybrid or flexible B1c/B2/B8 suitable for SMEs and distinguish these from local employment areas that can accommodate a wider range of business uses.

6.6.1 Boroughs may designate locations that have particular local importance for industrial and related functions as Locally Significant Industrial Sites. These **designations should be based on evidence** in strategic and local demand assessments and should complement provision in SILs. Inner London sites providing sustainable distribution services for the Central Activities Zone and Northern Isle of Dogs may be particularly appropriate for this designation.

Policy E7 Industrial intensification, co-location and substitution

- A Development Plans and development proposals should be proactive and encourage the intensification of business uses in Use Classes B1c, B2 and B8 occupying all categories of industrial land through:
- 1) introduction of small units
 - 2) development of multi-storey schemes
 - 3) addition of basements
 - 4) more efficient use of land through higher plot ratios having regard to operational yard space requirements (including servicing) and mitigating impacts on the transport network where necessary.
- B Development Plans and planning frameworks should be proactive and consider, in collaboration with the Mayor, whether certain logistics, industrial and related functions in selected parts of SIL or LSIS could be intensified to provide additional industrial capacity. Intensification can also be used to facilitate the consolidation of an identified SIL or LSIS to support the delivery of residential and other uses, such as social infrastructure, or to contribute to town centre renewal. This process must meet the criteria set out in Part D below. This approach should only be considered as part of a plan-led process of SIL or LSIS intensification and consolidation (and the areas affected clearly defined in Development Plan policies maps) or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough, and not through ad hoc planning applications. In LSIS (but not in SIL) the scope for co-locating industrial uses with residential and other uses may be considered. This should also be part of a plan-led or masterplanning process.
- C Mixed-use or residential development proposals on Non-Designated Industrial Sites should only be supported where:
- 1) there is no reasonable prospect of the site being used for the industrial and related purposes set out in Part A of [Policy E4 Land for industry, logistics and services to support London's economic function](#); or
 - 2) it has been allocated in an adopted local Development Plan Document for residential or mixed-use development; or
 - 3) industrial, storage or distribution floorspace is provided as part of mixed-use intensification (see also Part C of [Policy E2 Providing suitable business space](#)).

Mixed-use development proposals on Non-Designated Industrial Sites which co-locate industrial, storage or distribution floorspace with residential and/or other uses should also meet the criteria set out in Part D below.

- D The processes set out in Parts B and C above must ensure that:
- 1) the industrial and related activities on-site and in surrounding parts of the SIL, LSIS or Non-Designated Industrial Site are not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation noting that many businesses have 7-day/24-hour access and operational requirements
 - 2) the intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied
 - 3) appropriate design mitigation is provided in any residential element to ensure compliance with 1 above with particular consideration given to:
 - a) safety and security
 - b) the layout, orientation, access, servicing and delivery arrangements of the uses in order to minimise conflict
 - c) design quality, public realm, visual impact and amenity for residents
 - d) agent of change principles
 - e) vibration and noise
 - f) air quality, including dust, odour and emissions and potential contamination.
- E Development Plans and planning frameworks should consider, in collaboration with the GLA and neighbouring authorities within and outside London, the scope to facilitate the substitution of some of London's industrial capacity to related property markets elsewhere in London and beyond London's boundary where:
- 1) this results in mutual advantage to collaboration partners inside and outside London and supports a more efficient use of land
 - 2) full regard is given to both the positive and negative impacts of substitution including impacts on servicing the economy inside and outside London, businesses and customers, labour markets and commuting, supply-chains and logistics, congestion, pollution and vehicle miles

- 3) a clearly-defined strategy for the substitution of future demand capacity and/or relocation arrangements, where relevant, is in place to support this process.

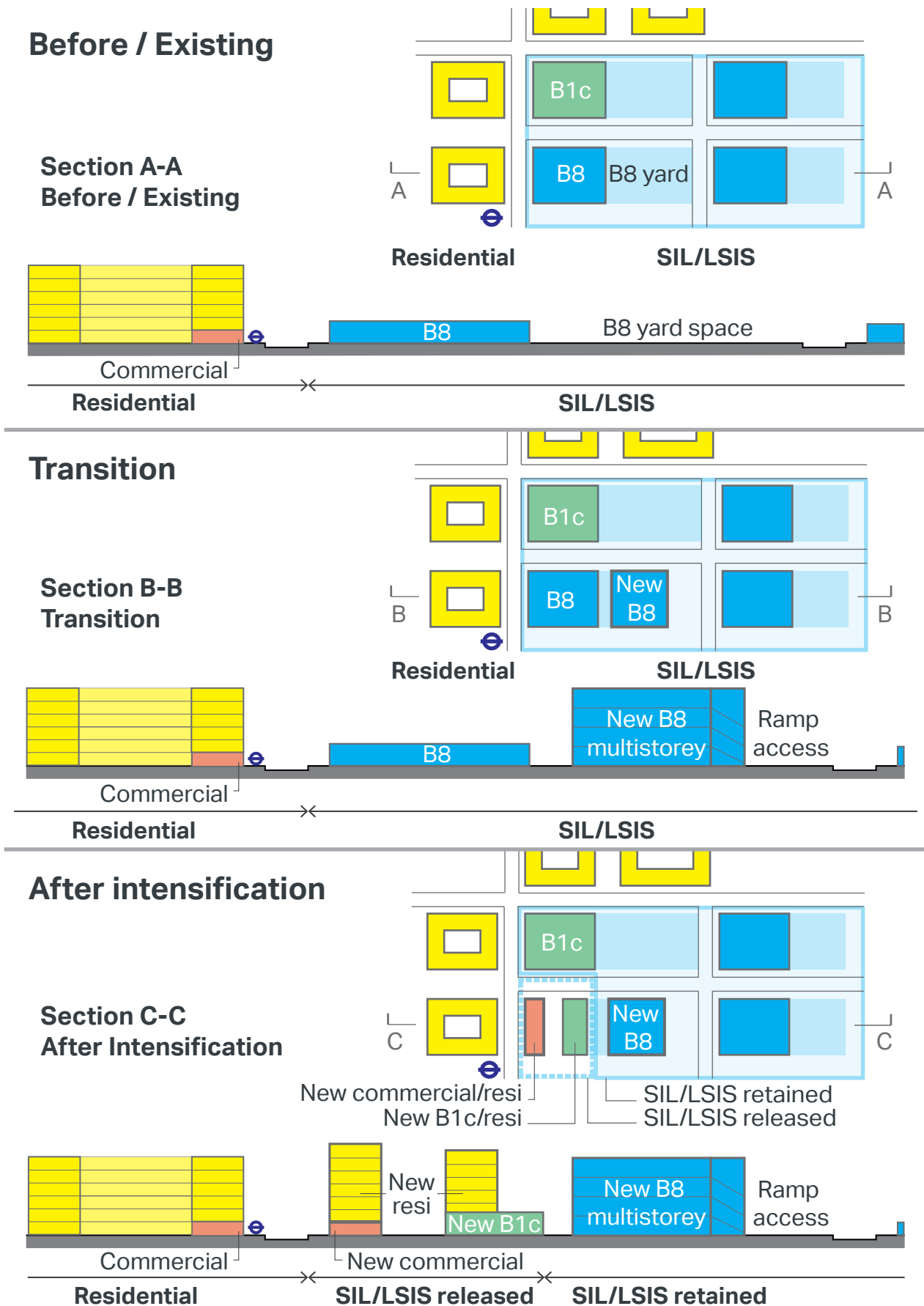
This approach should only be considered as part of a plan-led process of consolidation and intensification (and clearly defined in Development Plan policies maps) and not through ad hoc planning applications.

- 6.7.1 In collaboration with the Mayor, all boroughs are encouraged to explore the potential to **intensify industrial activities**¹⁰⁸ on industrial land to deliver additional capacity and to consider whether some types of industrial activities (particularly light industrial) could be co-located or mixed with residential and other uses. Through Local Plans, boroughs should also take a proactive approach to the **management of vacancy rates** to reach a level appropriate to the efficient functioning of the industrial market (considered to be five per cent for land and eight per cent for floorspace).¹⁰⁹
- 6.7.2 There may be scope for selected parts of SILs or LSISs to be consolidated or appropriately substituted. This should be done through a carefully co-ordinated plan-led approach to deliver an intensification of industrial and related uses in the consolidated SIL or LSIS and facilitate the **release of some land** for a mix of uses including residential. Local Plan policies' maps and/or OAPFs and masterplans (as relevant) should indicate clearly:
- i. the area to be retained, substituted and/or intensified as SIL or LSIS (and to provide future capacity for the uses set out in [Policy E5 Strategic Industrial Locations \(SIL\)](#) and [Policy E6 Locally Significant Industrial Sites](#)) and
 - ii. the area to be released from SIL or LSIS (see illustrative examples in [Figure 6.2](#)). Masterplans should cover the whole of the SIL or LSIS, and should be informed by the operational requirements of existing and potential future businesses.

¹⁰⁸ Industrial Intensification Primer, GLA, 2017; London Industrial Land Demand Study, CAG Consultants, 2017

¹⁰⁹ London Industrial Land Demand Study, CAG Consultants, 2017; Land for Industry and Transport SPG, GLA, 2012

Figure 6.2 - Simplified illustrations of approaches to SIL/LSIS



- 6.7.3 These approaches may be supported by **land swaps** within the SIL or LSIS, within the borough or in collaboration with neighbouring authorities. To ensure that such development works effectively, there should be a development agreement in place between the industrial developer and associated (non-industrial) developers.
- 6.7.4 Outside of areas designated as SIL or LSIS there may be opportunities to deliver co-location involving a **mix of industrial and residential** and/or other uses on the same site either side-by-side or through vertical stacking.
- 6.7.5 Evidence to demonstrate '**no reasonable prospect**' of Non-Designated Industrial Sites being used for industrial and related purposes should include:
- strategic and local assessments of demand
 - evidence of vacancy and marketing with appropriate lease terms and at market rates suitable for the type, use and size (for at least 12 months, or greater if required by a local Development Plan Document), and where the premises are derelict or obsolete, offered with the potential for redevelopment to meet the needs of modern industrial users
 - evidence that the scope for mixed-use intensification with industrial uses has been explored fully.
- 6.7.6 There is a significant amount of industrial and logistics capacity serving London that is located outside of the capital.¹¹⁰ There may be scope for some **substitution**¹¹¹ of London's industrial capacity to locations in the wider region where this results in mutual advantage, such as complementary business opportunities and transport infrastructure improvements. This will require close collaboration between planning authorities inside and outside London and must ensure that any substitution does not give rise to cumulative negative impacts including, for example, on business supply chains, labour markets, pollution and congestion.¹¹²
- 6.7.7 **Collaborative working** between the Mayor, boroughs and other stakeholders on Development Plan reviews, planning frameworks and masterplans provides useful mechanisms to co-ordinate these processes. This should ensure that the need to maintain sufficient capacity for industry to service London's economy and residents is considered alongside other planning objectives including

¹¹⁰ AECOM 2016, op. cit.

¹¹¹ The term 'substitution' refers here to making provision of land and floorspace to accommodate business uses in alternative locations outside London to meet projected future demand.

¹¹² London Industrial Land Demand Study, CAG Consultants, 2017; Industrial Land and Transport Study, Peter Brett Associates, 2017



delivery of strategic infrastructure, housing, social infrastructure and other uses. Further advice on the implementation of [Policy E7 Industrial intensification, co-location and substitution](#) will be provided in Supplementary Planning Guidance.

Policy E8 Sector growth opportunities and clusters

- A Employment opportunities for Londoners across a diverse range of sectors should be promoted and supported along with support for the development of business growth and sector-specific opportunities.
- B London's global leadership in tech across all sectors should be maximised.
- C The evolution of London's diverse sectors should be supported, ensuring the availability of suitable workspaces including:
 - 1) start-up, incubation and accelerator space for micro, small and medium-sized enterprises
 - 2) flexible workspace such as co-working space and serviced offices
 - 3) conventional space for expanding businesses to grow or move on
 - 4) laboratory space and theatre, television and film studio capacity
 - 5) affordable workspace in defined circumstances (see [Policy E3 Affordable workspace](#)).
- D Innovation, including London's role as a location for research and development should be supported, and collaboration between businesses, higher education providers and other relevant research and innovation organisations should be encouraged.
- E London's higher and further education providers and their development across all parts of London should be promoted. Their integration into regeneration and development opportunities to support social mobility and the growth of emerging sectors should be encouraged.
- F Clusters such as Tech City and MedCity should be promoted and the development of new clusters should be supported where opportunities exist, such as CleanTech innovation clusters, Creative Enterprise Zones, film, fashion and design clusters, and green enterprise districts such as in the Thames Gateway.

- G In collaboration with the Mayor, boroughs are encouraged to identify and promote the development of Strategic Outer London Development Centres (SOLDC) that have one or more specialist economic functions of greater than sub-regional importance. SOLDCs should be supported by:
- 1) encouraging local innovation to identify and enhance distinct economic strengths
 - 2) co-ordinating infrastructure investment
 - 3) creating a distinct and attractive business offer and public realm
 - 4) ensuring that development complements the growth of town centres and other business locations, and supports the environmental and transport objectives of this Plan
 - 5) bringing forward development capacity
 - 6) improving Londoners' access to employment opportunities.
- H Boroughs are encouraged to identify and support the growth of sustainably-located employment clusters in inner and outer London.

- 6.8.1 The Mayor wants London to continue to provide the best environment in the world in which to do business, so that businesses of all different sizes and sectors can reach their growth potential. This includes **supporting business and employment across all sectors** of the economy and capitalising on new growth opportunities in emerging sectors.
- 6.8.2 This Plan provides the planning framework to complement the **Mayor's Economic Development Strategy (EDS)** to ensure that the varied innovation and workspace requirements of London's businesses are met. This includes the retention and provision of flexible and other forms of workspace to support start-up, existing and growing SMEs. Incubator, accelerator and co-working spaces can provide support and collaboration opportunities for fledgling and growing businesses. Support should meet the requirements of a broad range of SMEs and, in particular, should be tailored to provide opportunities for women and people from BAME backgrounds.
- 6.8.3 In the EDS, the Mayor has identified a number of sector-specific opportunities and challenges that require a more targeted approach where he believes there are specific business growth opportunities. These include:
- **advanced urban services** – such as architecture, urban design, planning, engineering, property development, energy and transport. The application

of data and new technologies to these disciplines has the potential to make London work better as a city, or 'smarter', to become more productive, sustainable and liveable. The Mayor wants London to be a global test-bed for 'smart city' solutions, including improving the way people access public services. To support this, he will help to establish common standards for collecting data and make more data open to the public

- **culture and creative industries** – building on London's particular strengths in film, fashion and design, with clusters emerging across the city (including Creative Enterprise Zones – see [Policy HC5 Supporting London's culture and creative industries](#)), and the Mayor's vision to turn the Thames Estuary into a 'Production Corridor', developing facilities for artistic and creative production from East London to Southend and into Kent
- **financial and business services** – sustaining London's position as a global financial services hub along with a diverse range of professional and business services including legal services, accounting and management consultancy (see [Policy E1 Offices](#))
- **life sciences** - London, Cambridge and Oxford form the "golden triangle" – a world-leading inter-connected region for life sciences research, development, manufacturing and commercialisation. MedCity – a collaboration between London, Cambridge and Oxford Academic Health Science Centres, co-funded by the Mayor – seeks to promote and grow this life sciences cluster. Development Plans should support the range of existing and proposed medical and life sciences research districts associated with MedCity such as those around the Euston Road (including the Francis Crick Institute, Wellcome Trust and University College Hospital); Imperial College London's White City Campus; around Whitechapel, associated with Queen Mary University of London; and the London Cancer Hub. Within this sector there is particular demand for affordable 'grow-on' space (including laboratory space) to ensure London retains the innovations emerging from London-based universities. The networks and facilities that support London's role as a centre of medical excellence should also be supported
- **low carbon and environmental goods and services sector** – building on London's existing strengths in areas such as carbon finance, geothermal, wind energy, building technologies, alternative fuels, photovoltaics and waste management. The Mayor will support businesses to adopt the principles of the circular economy as set out in [Policy SI 7 Reducing waste and supporting the circular economy](#). The Mayor will also support the growth of London's CleanTech sector across London. West London in particular offers a unique set of opportunities to support the growth of this sector, with the

development of a major innovation campus by Imperial College London at White City, and the simultaneous redevelopment of Old Oak and Park Royal into a smart and sustainable district

- **tech and digital sector** – which supports the growth and evolution of all sectors in the economy. Planning should ensure that new developments have the digital connectivity required to support London’s global competitiveness (see [Policy SI 6 Digital connectivity infrastructure](#)). In the City Fringe, the Tech City cluster should be supported as one of London’s nationally-significant office locations and complemented by Development Plan policies to enable entrepreneurs to locate and expand there and to provide the flexibility and range of space that this sector needs, including affordable space. The Mayor will support the growth of the tech and digital sector across all of London
- **tourism** – which gives London an international profile – attracting people from across the world – and showcases London as a diverse and open city (see also [Policy E10 Visitor infrastructure](#)).

6.8.4 The Mayor also supports measures to secure and develop **London’s leading role as a centre of higher and further education** of national and international importance. London’s higher and further education providers have considerable potential for innovation supported by collaboration between businesses, the public sector and other relevant research organisations. These initiatives can act as a catalyst for economic growth and promote social mobility in areas with high levels of deprivation by creating new jobs and training opportunities for local residents, as well as supporting the growth of emerging sectors in London. The Mayor will support higher and further education providers and boroughs to identify opportunities to work in partnership to benefit from the development of higher and further education facilities.

6.8.5 The **Strategic Outer London Development Centre (SOLDC)** concept seeks to support the growth of business and employment opportunities beyond central London. This involves realising the potential of such locations to develop their specialist economic growth in ways which will help achieve the Mayor’s wider objectives. Town centres offer particular advantages for some specialist activities but the SOLDC concept can apply to a range of business locations including industrial areas. The approach is designed to encourage local innovation whilst ensuring that it supports and complements the economic prospects of neighbouring town centres including those in adjacent boroughs.

6.8.6 **Implementation** of the SOLDC concept will involve actions from a range of partners in light of local circumstances on matters including (but not exclusive to):

- Development Plans and frameworks (including Opportunity Area Planning Frameworks, local Area Action Plans and Town Centre strategies)
- strategic infrastructure plans
- new development and refurbishment
- public transport connectivity and capacity upgrades
- other infrastructure
- management and investment (including Business Improvement Districts)
- improvements to the business environment and public realm
- promotion, branding and marketing.

6.8.7 Boroughs across London contain a rich variety of employment areas, including industrial estates, high streets and areas within and on the edge of town centres, which provide locations and opportunities for **locally significant sectors and clusters of businesses**. These are important for local economies and provide diverse employment opportunities for local residents. Boroughs are encouraged to identify these sectors and clusters and set out policies in Local Plans that support their growth, having regard in particular to public transport provision and ensuring the vitality and viability of town centres.

Policy E9 Retail, markets and hot food takeaways

- A A successful, competitive and diverse retail sector, which promotes sustainable access to goods and services for all Londoners, should be supported in line with the wider objectives of this Plan, particularly for town centres ([Policy SD6 Town centres and high streets](#), [Policy SD8 Town centre network](#), [Policy SD7 Town centres: development principles and Development Plan Documents](#) and [Policy SD9 Town centres: Local partnerships and implementation](#)).
- B In Development Plans, boroughs should:
- 1) identify future requirements and locations for new retail development having regard to the town centre policies in this Plan and strategic and local evidence of demand and supply
 - 2) identify areas for consolidation of retail space where this is surplus to requirements

- 3) set out policies and site allocations to secure an appropriate mix of shops and other commercial units of different sizes, informed by local evidence and town centre strategies. Particular consideration should be given to the contribution large-scale commercial development proposals (containing over 2,500 sq.m. gross A Use Class floorspace) can make to the provision of small shops and other commercial units. Where justified by evidence of local need, policies should secure affordable commercial and shop units.

C Development Plans and development proposals should:

- 1) bring forward capacity for additional comparison goods retailing particularly in International, Metropolitan and Major town centres
- 2) support convenience retail in all town centres, and particularly in District, Local and Neighbourhood centres, to secure inclusive neighbourhoods and a sustainable pattern of provision where there is less need to travel
- 3) provide a policy framework to enhance local and neighbourhood shopping facilities and prevent the loss of retail and related facilities that provide essential convenience and specialist shopping
- 4) identify areas under-served in local convenience shopping and related services and support additional facilities to serve existing or new residential communities in line with [town centre Policy SD7 Town centres: development principles and Development Plan Documents](#)
- 5) support London's markets in their full variety, including street markets, covered markets, specialist and farmers' markets, complementing other measures to improve their management, enhance their offer and contribute to local identity and the vitality of town centres and the Central Activities Zone
- 6) manage existing edge-of-centre and out-of-centre retail (and leisure) by encouraging comprehensive redevelopment for a diverse mix of uses in line with [Policy SD6 Town centres and high streets](#), [Policy Policy SD8 Town centre network](#), [Policy SD7 Town centres: development principles and Development Plan Documents](#) and [Policy SD9 Town centres: Local partnerships and implementation](#) to realise their full potential for housing intensification, reducing car use and dependency, and improving access by walking, cycling and public transport

- 7) manage clusters of retail and associated uses having regard to their positive and negative impacts on the objectives, policies and priorities of the London Plan including:
 - a) town centre vitality, viability and diversity
 - b) sustainability and accessibility
 - c) place-making or local identity
 - d) community safety or security
 - e) mental and physical health and wellbeing.
- D Development proposals containing A5 hot food takeaway uses should not be permitted where these are within 400 metres walking distance from the entrances and exits of an existing or proposed primary or secondary school. Boroughs that wish to set a locally-determined boundary from schools must ensure this is sufficiently justified. Boroughs should also carefully manage the over-concentration of A5 hot food takeaway uses within town centres and other areas through the use of locally-defined thresholds in Development Plans.
- E Where development proposals involving A5 hot food takeaway uses are permitted, boroughs should encourage operators to comply with the Healthier Catering Commitment standards. Where justified, boroughs should ensure compliance with the Healthier Catering Commitment through use of a condition.
- F Development proposals involving the redevelopment of surplus retail space should support other planning objectives and include alternative town centre uses on the ground floor where viable (and in accordance with town centre [Policy SD7 Town centres: development principles and Development Plan Documents](#)) and residential development.

6.9.1 A diverse and competitive retail sector that meets the needs of Londoners and visitors to the capital is important. **Retailing is undergoing restructuring** in response to recent trends and future forecasts for consumer expenditure, population growth, technological advances and changes in consumer behaviour, with increasing proportions of spending made via the internet. As a result, retailing has evolved to become multi-channel, with a mix of physical stores, often supported by internet 'click and collect' in store or deliveries to homes,

workplaces or pick-up points, and in other cases purely online businesses with no physical stores.

- 6.9.2 Taking into account projected growth in household, commuter and tourist spending in London, retailers making more efficient use of existing space and special forms of trading (which includes internet-related spend), it is estimated that London could have a baseline **need for additional comparison goods retailing** of around 1.6 million sq.m. over the period 2016-2041, or 1.2 million sq.m. when current schemes in the planning pipeline are taken into account.¹¹³
- 6.9.3 In preparing or reviewing Development Plans, boroughs should take into account integrated strategic and local assessments of demand and capacity for both comparison and convenience goods retailing. Boroughs should plan proactively to accommodate that demand and **manage the transition of surplus retail** (including high street frontages, purpose-built shopping centres, malls and retail parks) to other uses in line with this policy and Policy SD6 Town centres and high streets, Policy SD8 Town centre network, Policy SD7 Town centres: development principles and Development Plan Documents, while ensuring sufficient capacity for convenience retail to meet the day-to-day needs of local residents.
- 6.9.4 **Street markets** in London can play a valuable economic, social and cultural role¹¹⁴ helping to meet Londoners' varied dietary requirements, extend choice and access to a range of goods, contribute to the vitality and viability of town centres and the character of high streets, and provide opportunities for new businesses to start-up. Several markets are of strategic importance, such as those at Portobello Road, Borough, Columbia Road and Camden for example, and offer significant attractions for Londoners and visitors to the capital. Many markets have a specialist function, serving the shopping and leisure needs of a specific ethnic group, or providing speciality products and services. Whilst the planning system can help support the range of London's markets, broader actions are often required in terms of management and investment. The Mayor has established the London Markets Board to help ensure that markets continue to flourish, support growth in town centres and associated high streets, and remain vibrant attractions for all Londoners and visitors to the capital.
- 6.9.5 Policy SD6 Town centres and high streets promotes a **diverse range of uses** to support the vitality and viability of town centres. Some retail and related uses when clustered can support town centres to develop niche or specialist roles and may provide important visitor attractions. Over-concentrations of some uses however, such as betting shops, pawnbrokers, pay-day loan

¹¹³ Experian, 2017 op cit.

¹¹⁴ Understanding London's Markets, GLA, 2017



stores, amusement centres and hot food takeaways, can give rise to particular concerns regarding the impact on mental and physical health and wellbeing, amenity, vitality, viability and diversity. The proliferation and concentration of these uses should be carefully managed through Development Plans and planning decisions, particularly in town centres that are within Strategic Areas for Regeneration (see Table A1.1), which tend to have higher numbers of these premises.¹¹⁵ Boroughs may require Health Impact Assessments for particular uses.

- 6.9.6 Obesity is one of the greatest health challenges facing the capital. In London 38 per cent of Year 6 pupils (10 to 11 year-olds) are overweight or obese – higher than any other region in England. Children living in the most deprived areas of London are twice as likely to be obese as children living in the least deprived areas.¹¹⁶ The creation of a **healthy food environment**, including access to fresh food, is therefore important. The number of hot food takeaways in London has been steadily rising, with London boroughs having some of the highest densities of hot food takeaways in England. More deprived areas commonly have a higher density of hot food takeaways than other areas.¹¹⁷
- 6.9.7 **Hot food takeaways** generally sell food that is high in calories, fat, salt and sugar, and low in fibre, fruit and vegetables. There is evidence that regular consumption of energy-dense food from hot food takeaways is associated with weight gain, and that takeaway food is appealing to children. It is recognised that the causes of obesity are complex and the result of a number of factors, and that a broad package of measures is required to reduce childhood obesity within London. A wide range of health experts recommend restricting the proliferation of hot food takeaways, particularly around schools, in order to help create a healthier food environment. Boroughs wishing to set a locally-determined boundary from schools should justify this using evidence provided by public health leads. Shift and night-time workers also find it particularly difficult to access healthy food due to the limited options available to them at night time.

¹¹⁵ London Town Centre Health Check, GLA, 2018

¹¹⁶ From Evidence into Action: Opportunities to Protect and Improve the Nation's Health. Public Health England, Oct. 2014, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/366852/PHE_Priorities.pdf

¹¹⁷ Fast Food Map. Public Health England, 2016, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/578041/Fast_food_map_2016.pdf



- 6.9.8 The **Healthier Catering Commitment**¹¹⁸ is a scheme that helps food businesses in London to provide healthier food to their customers. The scheme promotes a reduction in the consumption of fat, salt and sugar, and an increase in access to fruit and vegetables. This can also help ensure there are healthier food options available for night workers.
- 6.9.9 Commercial activity provides opportunities for micro, small and medium-sized enterprises to establish and contribute to the diversity of town centres. Independent businesses, including shops, cafés and restaurants, play an important role in supporting the vitality and vibrancy of town centres and local communities, and many operate from smaller premises. In parts of London, **small shops and other A Class uses suitable for occupation by SMEs** may be in short supply and affordability can be a key concern. Larger developments that include a significant amount of commercial floorspace can contribute to the diversity, vitality and vibrancy of town centres by providing a range of unit sizes that includes smaller premises. The High Streets for All report found that almost 70 per cent of small businesses consider rent unaffordable¹¹⁹ with average retail rents increasing 4 per cent per annum over the period 2009 to 2016.¹²⁰ Where there is local evidence of need, Development Plans should require affordable commercial and shop units (secured through planning conditions or planning obligations as appropriate).

¹¹⁸ The Healthier Catering Commitment, <https://www.london.gov.uk/what-we-do/business-and-economy/food/our-projects-food-london/healthier-catering-commitment>

¹¹⁹ High Streets for All, GLA, 2017

¹²⁰ London Town Centre Health Check, GLA, 2017



Policy E10 Visitor infrastructure

- A London's visitor economy and associated employment should be strengthened by enhancing and extending its attractions, inclusive access, legibility, visitor experience and management and supporting infrastructure, particularly to parts of outer London well-connected by public transport, taking into account the needs of business as well as leisure visitors.
- B The special characteristics of major clusters of visitor attractions and heritage assets and the diversity of cultural infrastructure in all parts of London should be conserved, enhanced and promoted.
- C A sufficient supply and range of serviced accommodation should be maintained.
- D The provision of high-quality convention facilities in town centres and in and around the CAZ should be supported.
- E Camping and caravan sites should be supported in appropriate locations.
- F Within the CAZ, strategically-important serviced accommodation should be promoted in Opportunity Areas, with smaller-scale provision in other parts of the CAZ except wholly residential streets or predominantly residential neighbourhoods (see [Policy SD5 Offices, other strategic functions and residential development in the CAZ](#)), and subject to the impact on office space and other strategic functions. Intensification of the provision of serviced accommodation should be resisted where this compromises local amenity or the balance of local land uses.
- G In outer London and those parts of inner London outside the CAZ, serviced accommodation should be promoted in town centres and within Opportunity Areas (in accordance with the sequential test as set out in [Policy SD7 Town centres: development principles and Development Plan Documents](#)) where they are well-connected by public transport, particularly to central London.
- H To ensure sufficient choice for people who require an accessible bedroom, development proposals for serviced accommodation should provide either:

- 1) 10 per cent of new bedrooms to be wheelchair-accessible in accordance with Figure 52¹²¹ incorporating either Figure 30¹²² or 33¹²³ of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice; or
- 2) 15 per cent of new bedrooms to be accessible rooms in accordance with the requirements of 19.2.1.2 of British Standard BS8300-2:2018 Design of an accessible and inclusive built environment. Buildings. Code of practice.¹²⁴

¹²¹ Figure 52 illustrates an example of an accessible bedroom with en-suite sanitary facilities

¹²² Figure 30 illustrates requirements for a wheelchair accessible en-suite shower room with corner WC for independent use

¹²³ Figure 33 illustrates requirements for a bathroom for independent use incorporating a corner WC layout

¹²⁴ 19.2.1.2 of BS8300-2:2018 specifies design and percentage requirements for accessible bedrooms including wheelchair accessible rooms with an en-suite shower room for independent use, rooms with a tracked hoist system and a connecting door to an adjoining (standard) bedroom for use by an assistant or companion, rooms with an en-suite shower room to meet the requirements of people with ambulant mobility impairments, and rooms large enough for easy adaptation to wheelchair accessible bedroom standards that are structurally capable of having grab rails installed quickly and easily.

- 6.10.1 London is the second most visited city in the world and the Mayor wants to spread economic and regeneration benefits by working with London & Partners to **promote tourism across the whole of the city**, including outside central London. This Plan supports the enhancement and extension of London's attractions particularly to town centres and well-connected parts of outer London, complemented by supporting infrastructure including visitor accommodation, a high-quality public realm, public toilets and measures to promote access by walking, cycling and public transport.
- 6.10.2 Given the importance of tourism to London's economy, London needs to ensure that it is able to **meet the accommodation demands of tourists** who want to visit the capital. It is estimated that London will need to build an additional 58,000 bedrooms of serviced accommodation by 2041, which is an average

of 2,230 bedrooms per annum.¹²⁵ In addition to leisure visitors the needs of business visitors require consideration, including provision of suitable facilities for meetings, conferences and exhibitions in both hotels and purpose-built convention and exhibition centres.

- 6.10.3 **Boroughs in the CAZ** are encouraged to direct strategically-significant serviced accommodation (defined as more than 20,000 sq.m. in the CAZ) towards the CAZ Opportunity Areas. Concentrations of serviced accommodation within parts of the CAZ that might constrain other important strategic activities and land uses (for example offices and other commercial, cultural and leisure uses) or erode the mixed-use character of an area should be avoided. **Boroughs in outer and inner London beyond the CAZ** are encouraged to plan proactively for new serviced accommodation in town centres to help spread the benefits of tourism to the whole of the capital.
- 6.10.4 Improving the availability of **accessible serviced accommodation**¹²⁶ is vital to ensuring that as many visitors as possible can stay in London and experience its visitor attractions and business offer. To help achieve this, serviced accommodation developments should achieve the highest standards of accessible and inclusive design (see also [Policy D5 Inclusive design](#)). The policy requirement provides two options and developers can choose the option which best fits the scale of development proposed. These requirements aim to recognise the need not only for standard wheelchair accessible rooms, but also rooms suitable for people with ambulant mobility impairments or older people who could benefit from additional access features, as well as rooms suitable for people who require assistance or need to be near to a carer.

¹²⁵ Working Paper 88, Projections of demand and supply for visitor accommodation in London to 2050, GLA Economics, 2017, https://www.london.gov.uk/sites/default/files/visitor_accommodation_-_working_paper_88.pdf

¹²⁶ Working Paper 90, Projections of demand and supply for accessible hotel bedrooms in London, GLA Economics, 2017, <https://www.london.gov.uk/sites/default/files/accessible-hotel-rooms-wp90.pdf>



Policy E11 Skills and opportunities for all

- A The Mayor will work with strategic partners to address low pay and gender and ethnicity pay gaps, and, as set out in his Skills for Londoners Strategy, co-ordinate national, regional and local initiatives to promote inclusive access to training, skills and employment opportunities for all Londoners.
- B Development proposals should support employment, skills development, apprenticeships, and other education and training opportunities in both the construction and end-use phases, including through Section 106 obligations where appropriate. Boroughs should ensure these are implemented in ways that:
- 1) enable those people undertaking training to complete their training and apprenticeships
 - 2) ensure the greatest possible level of take-up by Londoners of the training, apprenticeship and employment opportunities created
 - 3) increase the proportion of under-represented groups within the construction industry workforce.

In partnership with the Mayor, boroughs are encouraged to consider cross-borough working to open up opportunities, including those created via Section 106 obligations, on a reciprocal basis, to residents from adjacent boroughs and across London.

- 6.11.1 London has a strong, dynamic, global economy, but despite the capital's economic growth and prosperity, the employment rate has lagged behind the national average for three decades. More than 270,000 Londoners are unemployed, with particularly high rates of youth unemployment. Employment rates in London are consistently lower for those without any formal qualifications. London also has a growing problem of in-work poverty, associated with low-skilled low-paid work. Ensuring an **effective and responsive skills system** is critical to tackling these issues, enabling more Londoners to find and progress in work and support strategic and local regeneration.
- 6.11.2 Developers are often required to make **employment and training opportunities in new developments** available to local residents as part of Section 106 planning agreements. While there are examples of this approach working well, by ensuring that developers make a direct, positive contribution to the local communities in which they are working, the current model does not always

succeed in enabling residents to complete their training, securing sustainable employment for local people or meeting the demand for construction skills.

- 6.11.3 **Employment and training targets** included in Section 106 agreements are often based on the number of new apprenticeship or training starts, rather than the meaningful completion of these. The often short-term nature of construction projects compared to the longer duration of apprenticeships mean that apprentices employed at the beginning of a project may not have finished their training by the time construction on site is completed. This means that once developments finish, apprentices may not be able to move with contractors to developments in different areas (because they too will have their own local labour requirements and requirements for new training and employment starts). They may therefore, be unable to complete their training. In addition, local labour requirements can mean that contractors struggle to meet the demand for skills because they must source labour from a geographically-defined labour pool, where the required skills may not necessarily be available.
- 6.11.4 **Cross-borough working, co-ordination and sharing of data** on employment and training opportunities, together with a more uniform approach to the drafting of Section 106 obligations across the capital, could help deliver more successful employment outcomes and ensure that the objectives in Part B can be achieved. The GLA is keen to support this approach and, as recommended by the Mayor's Homes for Londoners Construction Skills Sub-Group, will investigate how best to do this, recognising that there is a need to demonstrate that any new approach improves outcomes for employers, boroughs and residents. This new approach should provide more meaningful employment and training opportunities for residents across London, while recognising the importance of new developments for providing local employment opportunities. Successful implementation of this approach should ensure that employment and apprenticeship opportunities created by developments are taken up and completed by a greater number of Londoners.

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

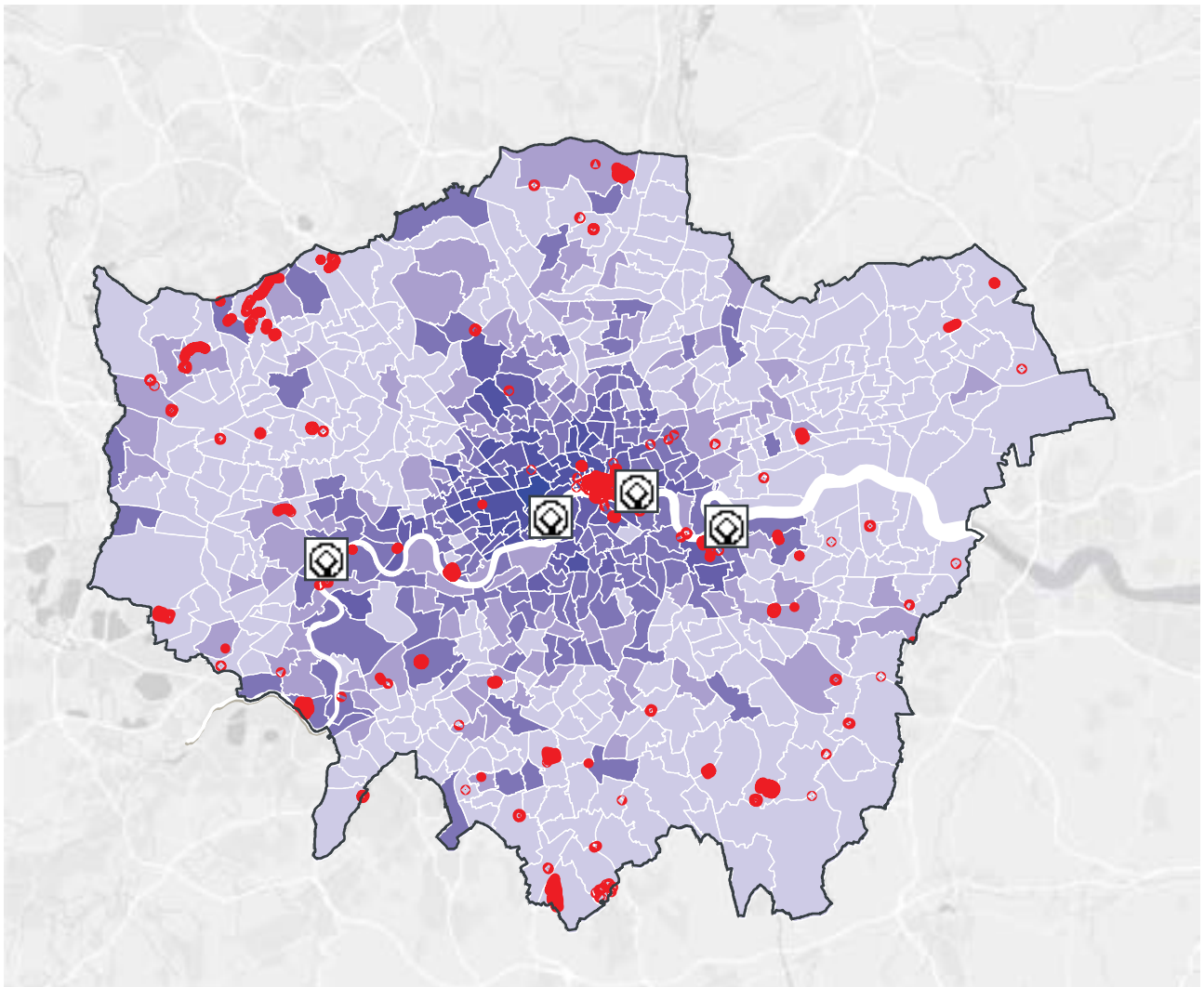
archaeological interest equivalent to a scheduled monument should be given equivalent weight to designated heritage assets.

- 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.



Figure 7.1 - Listed Buildings, Scheduled Monuments and World Heritage Sites



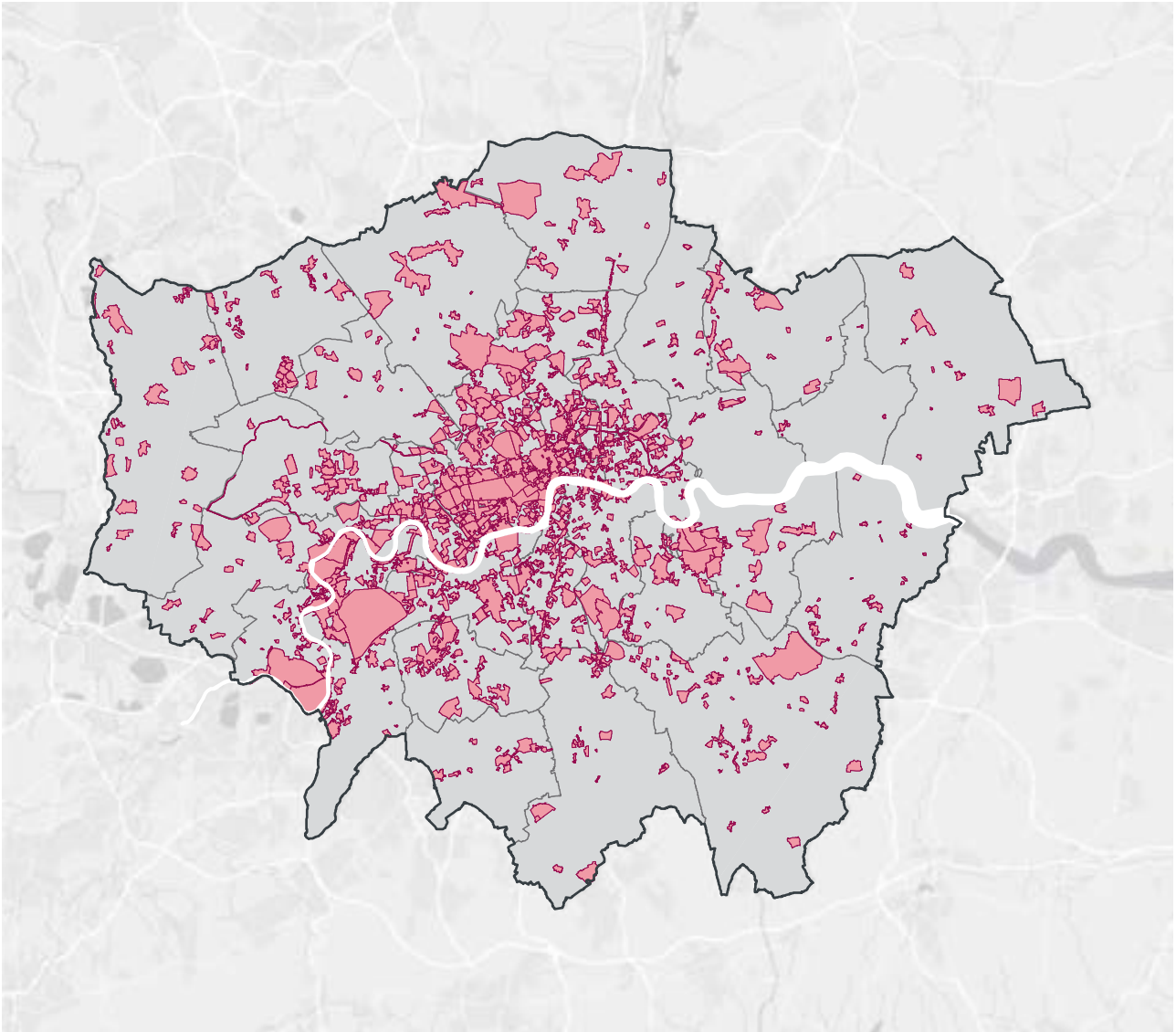
Listed Buildings per square km

- 350 - 710
- 100 - 349
- 50 - 99
- 10 - 49
- 5 - 9
- 0 - 4

- Scheduled Monuments
- Ⓞ UNESCO World Heritage Sites from left to right: Royal Botanical Gardens, Kew; Westminster; Tower of London; and Maritime Greenwich

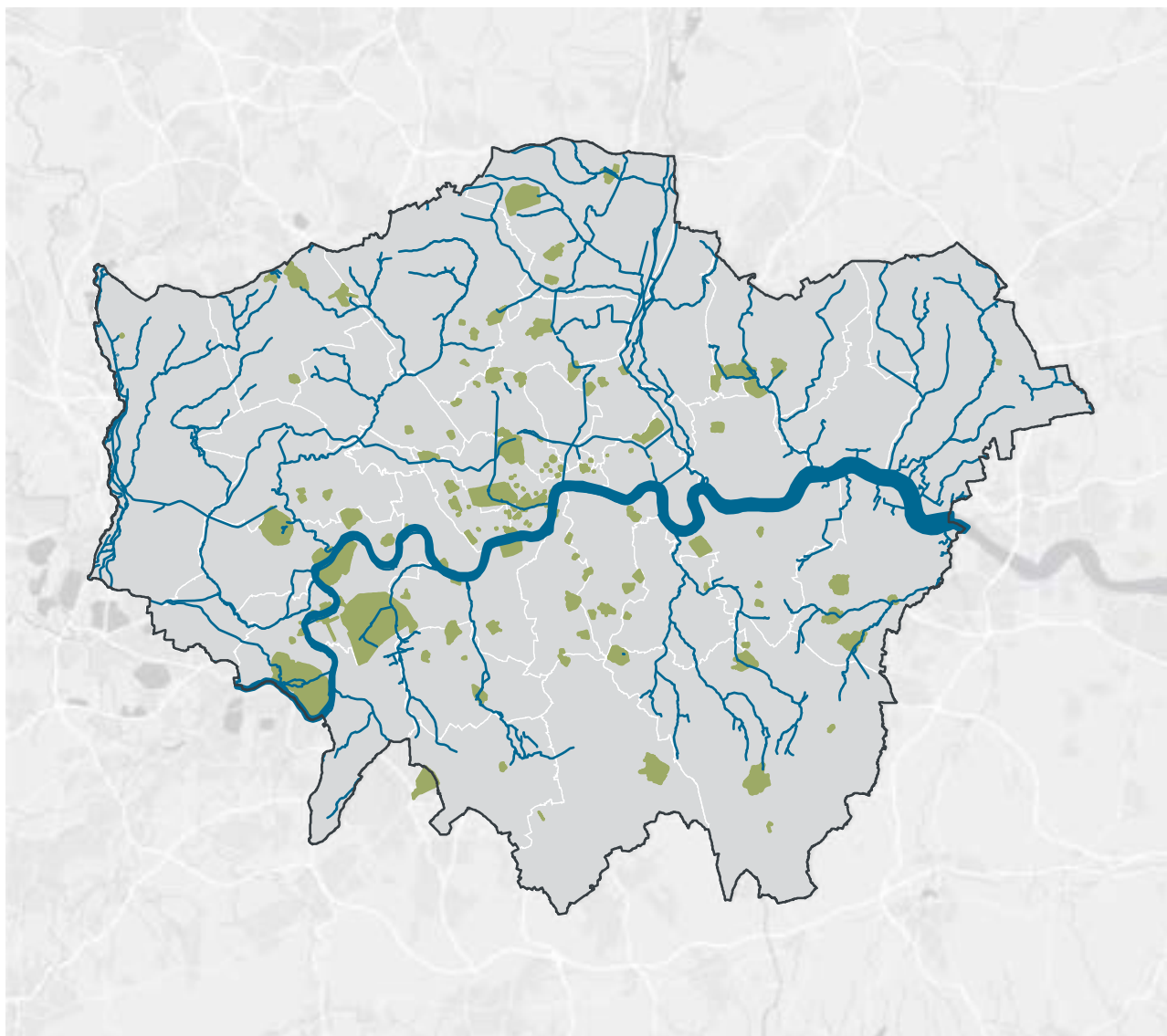
Source: Historic England

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

Figure 7.2 - London's Conservation Areas**London's Conservation Areas**

- Conservation Areas
London boroughs designate and review

Source: Historic
England

Figure 7.3 - London's Waterways and Registered Historic Parks & Gardens

London's Waterways and Registered Parks and Gardens

- Registered Historic Parks and Gardens
- Waterways

This map shows the spatial distribution of London's Registered Historic Parks and Gardens, which are designated heritage assets. It also shows the extensive network of London's waterways, many of which will have historic significance.

Source: Historic England

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

- 7.1.3 Ensuring the **identification and sensitive management of London’s heritage assets**, in tandem with promotion of the highest standards of architecture, will be essential to maintaining the blend of old and new that contributes to the capital’s unique character. London’s heritage reflects the city’s diversity, its people and their impact on its structure. When assessing the significance of heritage assets, it is important to appreciate the influence of past human cultural activity from all sections of London’s diverse community. Every opportunity to bring the story of London to people and improve the accessibility and maintenance of London’s heritage should be exploited. Supporting infrastructure and visitor facilities may be required to improve access and enhance appreciation of London’s heritage assets.
- 7.1.4 Many heritage assets make a significant contribution to local character which should be sustained and enhanced. The Greater London Historic Environment Record (GLHER)¹²⁷ is a comprehensive and dynamic resource for the historic environment of London containing over 196,000 entries. In addition to utilising this record, boroughs’ existing **evidence bases**, including character appraisals, conservation plans and local lists should be used as a reference point for plan-making and when informing development proposals.
- 7.1.5 As set out in Policy D1 London’s form, character and capacity for growth, Development Plans and strategies should demonstrate a clear understanding of the heritage values of a building, site or area and its relationship with its surroundings. Through proactive management from the start of the development process, planners and developers should **engage and collaborate with stakeholders** so that the capital’s heritage contributes positively to its future. To ensure a full and detailed understanding of the local historic environment, stakeholders should include Historic England, London’s Parks and Gardens Trust, The Royal Parks, boroughs, heritage specialists, local communities and amenity societies.
- 7.1.6 Historically, London has demonstrated an ability to regenerate itself, which has added to the city’s distinctiveness and diversity of inter-connected places. Today **urban renewal** in London offers opportunities for the creative re-use of heritage assets and the historic environment as well as the enhancement,

¹²⁷ The GLHER is a public record managed by Historic England and can be accessed by visiting the GLHER office and through remote searches that involve the supply of digital GLHER data. More information can be found at: <https://historicengland.org.uk/services-skills/our-planning-services/greater-london-archaeology-advisory-service/>

repair and beneficial re-use of heritage assets that are on the At Risk Register.¹²⁸ In some areas, this might be achieved by reflecting existing or original street patterns and blocks, or revealing and displaying archaeological remains; in others, it will be expressed by retaining and reusing buildings, spaces and features that play an important role in the local character of an area. Policy D1 London's form, character and capacity for growth further addresses the issue of understanding character and context.

- 7.1.7 **Heritage significance** is defined as the archaeological, architectural, artistic or historic interest of a heritage asset. This may be represented in many ways, in an asset's visual attributes, such as form, materials, architectural detail, design and setting, as well as through historic associations between people and a place, and where relevant, the historic relationships between heritage assets. Development that affects heritage assets and their settings should respond positively to the assets' significance, local context and character to protect the contribution that settings make to the assets' significance. In particular, consideration will need to be given to mitigating impacts from development that is not sympathetic in terms of scale, materials, details and form.
- 7.1.8 Where there is evidence of **deliberate neglect** of and/or damage to a heritage asset to help justify a development proposal, the deteriorated state of that asset will be disregarded when making a decision on a development proposal.
- 7.1.9 Understanding of **London's archaeology** is continuously developing with much of it yet to be fully identified and interpreted. To help identify sites of archaeological interest, boroughs are expected to develop up-to-date Archaeological Priority Areas for plan-making and decision-taking. Up-to-date Archaeological Priority Areas (APAs) are classified using a tier system recognising their different degrees of archaeological significance and potential as presently understood. Tier 1 APAs help to identify where undesignated archaeological assets of equivalent significance to a scheduled monument – and which are subject to the same policies as designated assets – are known or likely to be present.
- 7.1.10 Across London, Local Plans identify areas that have known archaeological interest or potential. The whole of the City of London has high archaeological sensitivity whilst elsewhere the Greater London **Archaeological Priority Area**

¹²⁸ The Heritage at Risk Register is produced annually as part of Historic England's Heritage at Risk programme. The Register includes buildings or structures, places of worship, archaeological sites, battlefields, wrecks, parks and gardens, and conservation area known to be at risk as a result of neglect, decay or inappropriate development. Further information can be found at: <https://historicengland.org.uk/advice/heritage-at-risk/>