

APPENDIX 4

CHAPTER THREE

**LONDON'S
PEOPLE**

3.1 This chapter sets out policies to support delivery of the Mayor's vision and objectives – and particularly those of ensuring London is:

- A city that meets the challenges of economic and population growth in ways that ensure a sustainable, good and improving quality of life and sufficient high quality homes and neighbourhoods for all Londoners, and help tackle the huge issue of deprivation and inequality among Londoners, including inequality in health outcomes.
- A city of diverse, strong, secure and accessible neighbourhoods to which Londoners feel attached, which provide all of its residents, workers, visitors and students – whatever their origin, background, age or status – with opportunities to realise and express their potential and a high quality environment for individuals to enjoy, live together and thrive.
- A city that delights the senses and takes care over its buildings and streets, having the best of modern architecture while also making the most of London's built heritage, and which makes the most of and extends its wealth of open and green spaces, natural environments and waterways, realising their potential for improving Londoners' health, welfare and development.

These will be realised by ensuring that London's people and communities have the homes, opportunities, facilities and social infrastructure they need to support a good and improving quality of life in the years to 2036. This chapter brings together policies to enable the planning system to help deliver equal life chances for all by reducing health inequalities, supporting social infrastructure provision such as health, education and sports facilities, creating genuinely sustainable neighbourhoods, while setting out a suite of housing policies to help deliver more homes for Londoners which meet a range of needs and are of high design quality. These issues are central to meeting the challenges of a growing and ever-more diverse population.

Ensuring equal life chances for all

POLICY 3.1 ENSURING EQUAL LIFE CHANCES FOR ALL

Strategic

- A The Mayor is committed to ensuring equal life chances for all Londoners. Meeting the needs and expanding opportunities for all Londoners – and where appropriate, addressing the barriers to meeting the needs of particular groups and communities – is key to tackling the huge issue of inequality across London.

Planning decisions

- B Development proposals should protect and enhance facilities and services that meet the needs of particular groups and communities. Proposals involving loss of these facilities without adequate justification or provision for replacement should be resisted.

LDF preparation

- C In preparing DPDs, boroughs should engage with local groups and communities to identify their needs and make appropriate provision for them, working with neighbouring authorities (including on a sub-regional basis) as necessary.
- D Boroughs may wish to identify significant clusters of specific groups (such as those who experience particular disadvantage and social exclusion) and consider whether appropriate provision should be made to meet their particular needs such as cultural facilities, meeting places or places of worship.

- 3.2 London's diversity is one of its greatest strengths and one of the things its residents most appreciate about living here: more languages and cultures are represented in the capital than in any other major city. The Mayor is committed to securing a more inclusive London which recognises shared values as well as the distinct needs of the capital's different groups and communities, particularly the most vulnerable and disadvantaged. He recognises that the city's strength is that it is far more than the sum of the communities and neighbourhoods that make it up. The GLA has a statutory duty to promote equality for all people in its work.³⁷ The Mayor's Equality Framework promotes an approach that brings Londoners together, rather than dividing them. To underpin this, the Mayor has adopted a new definition of equality³⁸ that focuses on promoting equality for those groups who enjoy legal protection against discrimination, but also for other groups who may face discrimination and disadvantage.

- 3.3 The Mayor is committed to ensuring a London that provides equal life chances

³⁷ Equality Act 2010

³⁸ Mayor of London, Equal Life Chances for All, GLA, July 2009

for all its people, enabling them to realise their potential and aspirations, make a full contribution to the economic success of their city – and share in its benefits – while tackling problems of deprivation, exclusion and discrimination that impede them. This includes understanding and addressing the physical and social barriers that prevent disabled people participating (‘the social model of disability’). Addressing the spatial needs of London’s people and communities is essential to enable them to enjoy and contribute to a safe, secure, accessible, inclusive and sustainable environment, and to ensure these are taken into account in new development. Development proposals should have regard to the supplementary planning guidance on Accessible London: Achieving an Inclusive Environment and other guidance issued by the Mayor.³⁹

- 3.4 Helping people, groups or communities to find consensual strategies or common grounds on which they can work together to create a united vision and a sense of belonging are important to realising these aims, and to sustaining cohesive communities. These should be built on the bonds that unite rather than the differences that separate.
- 3.5 It is important that the needs of all in society, such as faith groups, are addressed – if necessary through co-ordinated action with neighbouring boroughs. How these needs should be met is a matter for local determination; delivery will be the responsibility of boroughs, working with communities, through local strategic partnerships and other relevant locally based partnerships and organisations to identify those with greatest needs in a particular area, and the mechanisms by which they can be met, using statements of community involvement to support this (Policy 3.16, paragraph 3.88). A social infrastructure service delivery plan or published programme, possibly included in a community strategy and reflected in LDFs, may be a useful tool when assessing planning applications for development that affects existing, new or replacement social and community facilities.
- 3.6 The Mayor encourages all Londoners, especially those who have not previously done so, to engage in strategic and local decision making. He also seeks to make London more ‘age friendly,’ for example through liaising with the London Older People’s Strategies Group (LOPSG) and by securing play and informal recreation facilities for children and young people (Policy 3.6).
- 3.7 In assessing local communities’ needs in the way referred to in Policy 3.1D, particular regard should be had to the policies elsewhere in the Plan about establishing particular needs, including policies 3.2 (health and health inequalities), 3.8 (housing choice), 3.9 (mixed and balanced communities), 3.16 (social infrastructure), 3.17 (health and social care), 3.18 (education), 3.19 (sports facilities), 4.12 (improving opportunities for all), 7.1 (Lifetime neighbourhoods), 7.2 (inclusive environments) and 7.13 (local open space).

³⁹ Mayor of London, *Equal Life Chances for All*, GLA, July 2009; Mayor of London, *Best Practice Guidance on Health Issues in Planning*, GLA, June 2007; Mayor of London, *EIP Draft Housing Supplementary Planning Guidance*, GLA, August 2010

Improving health and addressing health inequalities

POLICY 3.2 IMPROVING HEALTH AND ADDRESSING HEALTH INEQUALITIES

Strategic

- A The Mayor will take account of the potential impact of development proposals on health and health inequalities within London. The Mayor will work in partnership with the NHS in London, boroughs and the voluntary and community sector as appropriate to reduce health inequalities and improve the health of all Londoners, supporting the spatial implications of the Mayor's Health Inequalities Strategy.
- B The Mayor will promote London as a healthy place for all – from homes to neighbourhoods and across the city as a whole – by:
 - a coordinating investment in physical improvements in areas of London that are deprived, physically run-down, and not conducive to good health
 - b coordinating planning and action on the environment, climate change and public health to maximise benefits and engage a wider range of partners in action
 - c promoting a strong and diverse economy providing opportunities for all.
- C The impacts of major development proposals on the health and wellbeing of communities should be considered, for example through the use of Health Impact Assessments (HIA).

Planning decisions

- D New developments should be designed, constructed and managed in ways that improve health and promote healthy lifestyles to help to reduce health inequalities.

LDF Preparation

- E Boroughs should:
 - a work with key partners to identify and address significant health issues facing their area and monitor policies and interventions for their impact on reducing health inequalities
 - b promote the effective management of places that are safe, accessible and encourage social cohesion
 - c integrate planning, transport, housing, environmental and health policies to promote the health and wellbeing of communities
 - d ensure that the health inequalities impact of development is taken into account in light of the Mayor's Best Practice Guidance on

- 3.9 The living environment has a fundamental impact on the health of a population, whether positive or negative. Good housing, employment and a good start in life can all help to reduce health inequalities at the local level; while poor environmental quality, housing conditions or pollution can exacerbate them. Targeted interventions to protect and promote health should help address health inequalities. Where a development or plan is anticipated to have significant implications for people's health and wellbeing, an HIA should be considered to identify opportunities for minimising harms (including unequal impacts) and maximising potential health gains. An HIA can be integrated into Strategic Environmental Assessment, Sustainability Appraisal or Environmental Impact assessment, where these are required. Borough public health teams are a valuable source of support and advice for planning and critically appraising HIAs and it would be helpful to consult with them early in the process. The London Plan will help deliver Objective 5: Healthy Places of the Mayor's Health Inequalities Strategy to ensure new homes and neighbourhoods are planned and designed to promote health and reduce health inequalities.
- 3.9 The planning system can play a key role in promoting health and reducing health inequalities. Health inequalities are distributed across different population groups, are often geographically concentrated, with poor health closely aligned to poverty and deprivation (see Map 1.3 - Index of Deprivation). The Health and Social Care Act 2012 gives boroughs an enhanced role in improving public health in their area through the emerging 'Health and Wellbeing Boards', the Joint Strategic Needs Assessment (JSNA) process and the development and implementation of Joint Health and Wellbeing Strategies⁴⁰. This will provide an opportunity to align strategies and programmes, informing plan-making and development management. The new Public Health Outcomes Framework summarises the new public health responsibilities of boroughs and includes outcomes closely linked to planning including air quality, the use of green space, road casualties and fuel poverty.
- 3.10 The policies in this Plan seek to address the main health issues facing the capital, (including mental health, obesity, cancer, cardio-vascular and respiratory diseases) by seeking to ensure new developments are designed, constructed and managed in ways that improve health and reduce health inequalities (Policy 7.1). The development and regeneration of areas for regeneration (Policy 2.14) and many of the designated opportunity and intensification areas (Policy 2.13) provide the greatest opportunity to improve health and reduce health inequalities.
- 3.10A New development should be supported by necessary and accessible health and social infrastructure. Planning obligations should be secured, and the Community Infrastructure Levy should be used as appropriate to ensure delivery of new facilities and services (policies 3.16-3.19, 8.2 and 8.3), including places for meetings between all members of a community (see policies 3.1 and 7.1). This Plan

⁴⁰ Department of Health, Joint Strategic Needs Assessments and Joint Health and Wellbeing Strategies – statutory guidance. DoH, 2013

also aims to create opportunities for employment and economic development to meet the needs of the community; improve access to green and open spaces and leisure facilities (including using the planning system to secure new provision); support safe and sustainable transport systems (including walking and cycling); reduce road traffic casualties; improve air quality; reducing noise; increase access to healthy foods; create places for children to play; and ensure there is a good range of local services. The principles contained within the Mayor's Best Practice Guidance (BPG) on Health Issues in Planning⁴¹ will inform the health inequalities impact of a development, and are particularly important for Opportunity Area Planning Frameworks (OAPF) and masterplanning. This BPG will be updated to reflect the new policy and changes to the NHS in London and will include a methodology for undertaking HIAs.

- 3.11 Housing has a major impact on the health of residents, and the policies in this Plan are intended to enable Londoners to live in well designed, high quality homes, appropriately sized and energy efficient, warm and dry, safe, providing good access to high quality social infrastructure, green spaces, and limiting disturbance from noise, or exposure to poor air quality. The detailed design of neighbourhoods is also very important for health and well-being (see Chapter 7). This can be complemented by other measures, such as local policies to address concerns over the development of fast food outlets close to schools.⁴² Places can be designed to promote health, for example by providing attractive spaces that promote active lifestyles. The Mayor and boroughs will seek to support the delivery of new and improved facilities for sport, walking, cycling, play and other forms of physical activities, including maximising opportunities associated with the legacy of the 2012 Games.
- 3.12 The voluntary and community sector has an essential role in tackling health inequalities at the local level, particularly in promoting and supporting community involvement.

Housing

- 3.13 The Mayor is clear that London desperately needs more homes in order to promote opportunity and real choice for all Londoners, with a range of tenures that meets their diverse and changing needs and at prices they can afford. To achieve these aims, he is committed to taking effective steps to encourage the provision of new homes through the policies in this Plan (which deal with identifying housing need and capacity to help meet this) and in his London Housing Strategy (which deals, among other things, with detailed questions of investment and delivery for which he has particular responsibility).
- 3.14 With a growing population and more households, delivering more homes for Londoners meeting a range of needs, of high design quality and supported by the

⁴¹ Mayor of London, Best Practice Guidance (BPG) on Health Issues in Planning, GLA, 2007

⁴² Mayor of London, Takeaways Toolkit, GLA, November 2012

social infrastructure essential to a good quality of life will be a particular priority over the period covered by the Plan. This section of the Plan brings together policies on housing requirements and supply (including affordable housing), design and quality. It also covers social infrastructure, such as health, education and sports.

London's housing requirements

- 3.14A The Mayor recognises the pressing need for more homes in London and to help boost significantly the supply of housing, this Plan sets out the average annual minimum housing supply targets for each borough until 2025. These targets are informed by the need for housing as evidenced by the GLA's 2013 Strategic Housing Market Assessment (SHMA)⁴³ and London's housing land capacity as identified through its 2013 Strategic Housing Land Availability Assessment (SHLAA)⁴⁴. Consistent with the National Planning Policy Framework, this approach takes account of London's locally distinct circumstances of pressing housing need and limited land availability and aims to deliver sustainable development.
- 3.15 Though there are differences in the type, quality and cost of housing across London, the complex linkages between them mean that for planning purposes, London should be treated as a single housing market. Many of these linkages extend beyond London, underscoring the importance of inter-regional coordination in meeting housing requirements in the wider south east, especially in the adjoining counties.
- 3.16 As noted in Chapter 1, there is clear evidence that London's population is likely to increase significantly more than was anticipated in the past. However, there is uncertainty as to the actual scale and nature of this increase. This Plan therefore assumes that London's population is set to increase by up to 2 million in the 25 years to 2036 with the level of growth reducing over time, but still remaining significantly above that assumed in the 2011 Plan. There is also uncertainty as to the size and number of future households. As a central assumption the Plan is predicated on average household size falling in line with DCLG assumptions from 2.47 in 2011 to 2.34 persons/household in 2036. Under this assumption, the number of households in London could rise by 1 million⁴⁵ by 2036.
- 3.16A In view of these uncertainties it is clearly not realistic to plan in detail for the whole of this period, but rather to take the possible long term trend as a 'direction of travel' for which the Mayor must 'plan, monitor and manage'. In this context, the Plan is based on a projection for 40,000 more households a year (2011-2036). These projected trends will be monitored very closely, with a view to a further early revision, or if necessary a full review of the Plan by 2019/20.

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

44 Mayor of London, The London Strategic Housing Land Availability Assessment 2013 (SHLAA). GLA, 2014

45 Mayor of London, SHMA, 2014 op cit

- 3.16c This level of household growth does not represent the growth in housing requirements over the life of the Plan. This is identified through the GLA's SHMA⁴⁶ which draws on government guidance⁴⁷ to identify London's need for both market and affordable housing. As well as demographic trends the SHMA reflects the Mayor's intention to seek to address the existing backlog in housing need and takes account of the range of factors which bear on this. On this basis, the central projection in the SHMA indicates that London will require between approximately 49,000 (2015-2036) and 62,000 (2015-2026) more homes a year. This range incorporates different levels of population change over the period, the time taken to address current need (backlog) and the anticipated under delivery between 2011 and 2015. The 2015-2036 figure of 49,000 additional homes a year provides the basis for the detailed housing need figures set out in this Plan. In light of the projected higher need, especially at the start of the plan period, this figure should be regarded as a minimum.
- 3.17 On the supply side, the London SHLAA is designed to address the NPPF requirement to identify supply to meet future housing need as well as being 'consistent with the policies set out in this Framework'⁴⁸, not least its central diktum that resultant development must be sustainable. The SHLAA methodology⁴⁹ is designed to do this authoritatively in the distinct circumstances of London, including the limited stock of land here and the uniquely pressurised land market and dependence on recycling brownfield land currently in existing uses. This methodology has been developed and refined over time through partnership working with boroughs and others involved in London housing, as well as to reflect the principles of government guidance on preparation of SHLAAs nationally⁵⁰.

46 *ibid*

47 CLG SHMA Practice Guidance 2007

48 CLG NPPF *op cit* para 47

49 Mayor of London, SHLAA, 2014 *op cit*

50 CLG SHLAA practice guidance, 2007

Table 3.1 Annual average housing supply monitoring targets 2015 – 2025

Borough	Minimum ten year target	Annual monitoring target
	2015-2025	2015-2025
Barking and Dagenham	12,355	1,236
Barnet	23,489	2,349
Bexley	4,457	446
Brent	15,253	1,525
Bromley	6,413	641
Camden	8,892	889
City of London	1,408	141
Croydon	14,348	1,435
Ealing	12,972	1,297
Enfield	7,976	798
Greenwich	26,850	2,685
Hackney	15,988	1,599
Hammersmith and Fulham	10,312	1,031
Haringey	15,019	1,502
Harrow	5,927	593
Havering	11,701	1,170
Hillingdon	5,593	559
Hounslow	8,222	822
Islington	12,641	1,264
Kensington and Chelsea	7,330	733
Kingston upon Thames	6,434	643
Lambeth	15,594	1,559
Lewisham	13,847	1,385
LLDC	14,711	1,471
Merton	4,107	411
Newham	19,945	1,994
Redbridge	11,232	1,123
Richmond upon Thames	3,150	315
Southwark	27,362	2,736
Sutton	3,626	363
Tower Hamlets	39,314	3,931
Waltham Forest	8,620	862
Wandsworth	18,123	1,812
Westminster	10,677	1,068
London total	423,887	42,389

- 3.174 Following the national imperative to address identified need, the 2013 London SHLAA has been more rigorous than its predecessors in testing potential housing capacity. Its results have been translated in Table 3.1 as minimum housing supply targets. It shows that over the period 2015 to 2025, London has capacity for a least 420,000 additional homes or 42,000 per annum.
- 3.175 This is not unrealistic in terms of the granting of planning permission – since 2008, despite a major economic downturn, an average of almost 55,000 homes have been approved each year⁵¹. The greatest challenge is in translating this capacity into completions. As independent research has shown⁵², the planning system can help in this but it is by no means the only barrier to delivery of homes on the ground (see para 3.85a). It is clear that a step change in delivery is required if London is to address its housing need.
- 3.18 As context for this, boroughs must be mindful that for their LDFs to be found sound they must demonstrate they have sought to boost significantly the supply of housing as far as is consistent with the policies set out in the Framework⁵³. Of particular importance in this regard is the overarching national objective to secure sustainable development⁵⁴ and the need to secure actual delivery⁵⁵. To address government requirements soundly in the unique circumstances of London means coordinating their implementation across the capital's housing market through the capital's unique two tier planning system where the development plan for an area is composed of the Local Plan and the London Plan, and the Local Plan must be in general conformity with the London Plan.
- 3.19 London is part of a global and national housing market as well as having its own, more local and acute housing need which place a unique challenge in reducing the gap between need and supply. Boroughs should use their housing supply targets in Table 3.1 as minima, augmented with additional housing capacity to reduce the gap between local and strategic housing need and supply. In this regard, town centres (see Policy 2.15), opportunity and intensification areas (Policy 2.13), and other large sites (Policy 3.7) could provide a significant increment to housing supply. In addition, the process of managing the release of surplus industrial land should focus on bringing forward areas with good public transport accessibility which will be particularly appropriate for high density development (Policy 2.17). Experience in preparing opportunity area and other development frameworks (such as those for intensification areas and town centres, as well as broader proposals for growth corridors), demonstrates that through detailed partnership working in light of local and strategic policy, housing output from these locations normally exceeds that anticipated by the SHLAA – frequently by a significant margin.

51 Mayor of London, SHLAA, 2014. Op cit

52 Molior London, Barriers to Housing Delivery, What are the market perceived barriers to residential development in London, GLA 2012

53 CLG NPPF 2012 op cit para 47

54 CLG NPPF 2012 op. cit, paras 6-10

55 CLG NPPF 2012 op cit para 174

- 3.19 To ensure effective local contributions to meeting London's need for 49,000 more homes per annum, Local Plans should therefore demonstrate how individual boroughs intend to address in terms of Policy 3.3 the relevant minimum housing supply target in Table 3.1 and seek to exceed the target through:
- additional sources of housing capacity, especially that to be brought forward from the types of broad location set out in Policy 3.3;
 - collaborative working with other relevant partners including the Mayor, to ensure that the Local Plan is in general conformity with the London Plan and includes final minimum housing targets identified through the above process; and
 - partnership working with developers, land owners, investors, the Mayor and other relevant agencies to secure the timely translation of approved housing capacity to completions taking account of Policy 3.15.
- 3.19A National policy requires boroughs to identify a supply of specific deliverable sites sufficient to provide 5 years' worth of housing against their housing requirements, with an additional buffer of 5% moved forward from later in the plan period (or 20% where there has been persistent under delivery). In compiling their 5 year supply estimates boroughs should demonstrate that they have maximised the number of identified sites. However, given London's reliance on recycled land currently in other uses, it must be recognised that in addressing this national policy objective, capacity which elsewhere in the country would be termed 'windfall' must here form part of the 5 year supply. In order to support the range of activities and functions required in London as set out in this Plan, application of the 5% - 20% buffers should not lead to approval of schemes which compromise the need to secure sustainable development as required in the NPPF.

Housing Supply

POLICY 3.3 INCREASING HOUSING SUPPLY

Strategic

- A The Mayor recognises the pressing need for more homes in London in order to promote opportunity and provide a real choice for all Londoners in ways that meet their needs at a price they can afford.
- B Working with relevant partners, the Mayor will seek to ensure the housing need identified in paragraphs 3.16a and 3.16b is met particularly through provision consistent with at least an annual average of 42,000 net additional homes across London¹ which will enhance the environment, improve housing choice and affordability and provide

¹ Net additional homes including additional dwellings provided by development and redevelopment, conversion of residential and non-residential property, long term vacant properties brought back into use and household spaces in non-self-contained accommodation.

better quality accommodation for Londoners.

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

LDF preparation

- D Boroughs should seek to achieve and exceed the relevant minimum borough annual average housing target in Table 3.1, if a target beyond 2025 is required, boroughs should roll forward and seek to exceed that in Table 3.1 until it is replaced by a revised London Plan target.
- Da Boroughs should draw on the housing benchmarks in table 3.1 in developing their LDF housing targets, augmented where possible with extra housing capacity to close the gap between identified housing need (see Policy 3.8) and supply in line with the requirement of the NPPF
- E Boroughs should identify and seek to enable additional development capacity to be brought forward to supplement these targets having regard to the other policies of this Plan and in particular the potential to realise brownfield housing capacity through the spatial structure it provides including:
- a intensification (see policies 2.13, 3.4)
 - b town centre renewal, especially centres with good public transport accessibility (see Policy 2.15)
 - c opportunity and intensification areas and growth corridors (see policies 2.13 and 2.3)
 - d mixed use redevelopment, especially of surplus commercial capacity and surplus public land, and particularly that with good transport accessibility (see policies 2.7, 2.11, 4.2-4.4)
 - e sensitive renewal of existing residential areas, especially in areas of good public transport accessibility (see policies 3.4, 3.5, 3.14).
- F Boroughs must identify new, and review existing housing sites for inclusion in LDFs.
- G Boroughs should monitor housing capacity and provision against the average targets in Table 3.1, local housing needs assessments and the sensitivity ranges set out in the SHLAA report and updated in the London Plan Annual Monitoring Report.

324 Table 3.1 only covers the period 2015 – 2025. LDFs which come forward following publication of this Plan and before its replacement or alteration will not be covered for their full term by the current targets. The Mayor therefore commits to revising the targets by 2019/20. In order to provide guidance for any intervening period, LDFs should roll forward the annual targets in Table 3.1 expressing the rolling target as an indicative figure to be checked and adjusted against any revised housing targets.

- 3.25 Monitoring the housing supply figures is an essential part of the 'plan, monitor and manage' approach taken to ensure that the London Plan delivers as many additional homes each year as is practicable. Annex 4 sets out the components of the targets which the Mayor will use for monitoring supply.
- 3.26 The SHLAA methodology provides for phasing of development of individual sites in the future. However, an annual monitoring target based on the average capacity estimated to come forward over ten years may not fully reflect unique uncertainties in housing output arising from changes in the economy. Boroughs may wish to highlight the implications of these uncertainties for achievement of their targets in their Annual Monitoring Reports (AMR), drawing on the strategic context provided by the SHLAA report, the London Plan AMR and the Housing SPG.

POLICY 3.4 OPTIMISING HOUSING POTENTIAL

Strategic, LDF preparation and planning decisions

- A Taking into account local context and character, the design principles in Chapter 7 and public transport capacity, development should optimise housing output for different types of location within the relevant density range shown in Table 3.2. Development proposals which compromise this policy should be resisted.
- 3.28 A rigorous appreciation of housing density is crucial to realising the optimum potential of sites, but it is only the start of planning housing development, not the end. It is not appropriate to apply Table 3.2 mechanistically. Its density ranges for particular types of location are broad, enabling account to be taken of other factors relevant to optimising potential – local context, design and transport capacity are particularly important, as well as social infrastructure (Policy 3.16), open space (Policy 7.17) and play (Policy 3.6). These broad ranges also provide the framework within which boroughs can refine local approaches to implementation of this strategic policy through their LDFs⁵⁸. Where appropriate, they can also provide a tool for increasing density in situations where transport proposals will improve public transport accessibility in the future. It is important that higher density housing is not automatically seen as requiring high rise development.
- 3.28A Geographically specific guidance on implementation of policy 3.4 is provided for Opportunity and Intensification Areas in paragraphs 2.61 and 2.62; for Town Centres in Policy 2.15 and paragraphs 2.72B – 2.72H and 4.42A-B; for surplus industrial land in paragraphs 2.85 and 4.23 and for other large housing sites in paragraph 3.42. More general guidance on implementation of Policy 3.4 is provided in the Housing SPG including exceptional circumstances where densities above the relevant density range may be justified.

58 CLG NPPF 2012 op cit para 58

Table 3.2 Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare)

Setting	Public Transport Accessibility Level (PTAL)		
	0 to 1	2 to 3	4 to 6
Suburban	150–200 hr/ha	150–250 hr/ha	200–350 hr/ha
3.8–4.6 hr/unit	35–55 u/ha	35–65 u/ha	45–90 u/ha
3.1–3.7 hr/unit	40–65 u/ha	40–80 u/ha	55–115 u/ha
2.7–3.0 hr/unit	50–75 u/ha	50–95 u/ha	70–130 u/ha
Urban	150–250 hr/ha	200–450 hr/ha	200–700 hr/ha
3.8–4.6 hr/unit	35–65 u/ha	45–120 u/ha	45–185 u/ha
3.1–3.7 hr/unit	40–80 u/ha	55–145 u/ha	55–225 u/ha
2.7–3.0 hr/unit	50–95 u/ha	70–170 u/ha	70–260 u/ha
Central	150–300 hr/ha	300–650 hr/ha	650–1100 hr/ha
3.8–4.6 hr/unit	35–80 u/ha	65–170 u/ha	140–290 u/ha
3.1–3.7 hr/unit	40–100 u/ha	80–210 u/ha	175–355 u/ha
2.7–3.0 hr/unit	50–110 u/ha	100–240 u/ha	215–405 u/ha

Notes to Table 3.2

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

Central – areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 metres walking distance of an International, Metropolitan or Major town centre.

Urban – areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys, located within 800 metres walking distance of a District centre or, along main arterial routes

Suburban – areas with predominantly lower density development such as, for example, detached and semi-detached houses, predominantly residential, small building footprints and typically buildings of two to three storeys.

- 3.29 The form of housing output should be determined primarily by an assessment of housing requirements and not by assumptions as to the built form of the development. While there is usually scope to provide a mix of dwelling types in different locations, higher density provision for smaller households should be focused on areas with good public transport accessibility (measured by Public Transport Accessibility Levels [PTALs]), and lower density development is generally most appropriate for family housing.
- 3.30 Where transport assessments other than PTALs can reasonably demonstrate that a site has either good existing or planned public transport connectivity and

capacity, and subject to the wider concerns of this policy, the density of a scheme may be at the higher end of the appropriate density range. Where connectivity and capacity are limited, density should be at the lower end of the appropriate range. The Housing SPG provides further guidance on implementation of this policy in different circumstances including mixed use development, taking into account plot ratio and vertical and horizontal mixes of use.

- 3.31 Residential density figures should be based on net residential area, which includes internal roads and ancillary open spaces. Family housing is generally defined as having three or more bedrooms. Car parking provision should be in accordance with the standards outlined in Chapter 6. The Housing SPG provides guidance on addressing the relationships between car parking provision, development density and levels of public transport accessibility in different types of location.

POLICY 3.5 QUALITY AND DESIGN OF HOUSING DEVELOPMENTS

Strategic

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

Planning decisions and LDF preparation

- B The design of all new housing developments should enhance the quality of local places, taking into account physical context; local character; density; tenure and land use mix; and relationships with, and provision of, public, communal and open spaces, taking particular account of the needs of children, disabled and older people.
- C LDFs should incorporate requirements for accessibility and adaptability¹, minimum space standards² including those set out in Table 3.3, and water efficiency.³ The Mayor will, and boroughs should, seek to ensure that new development reflects these standards. The design of all new dwellings should also take account of factors relating to 'arrival' at the building and the 'home as a place of retreat'. New homes should have adequately sized rooms and convenient and efficient room layouts which are functional and fit for purpose, meet the changing needs of Londoners over their lifetimes, address climate change adaptation and mitigation and social inclusion objectives and should be conceived and developed through an effective design process⁴.

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

² Technical housing standards – nationally described space standard. DCLG 2015

³ London Plan Policy 5.15

⁴ Mayor of London, Housing SPG 2016

- D Development proposals which compromise the delivery of elements of this policy, may be permitted if they are demonstrably of exemplary design and contribute to achievement of other objectives of this Plan.
- E The Mayor will provide guidance on implementation of this policy that is relevant to all tenures.

Table 3.3 Minimum space standards for new dwellings⁵⁷

Number of bedrooms	Number of bed spaces	Minimum GIA (m ²)			Built-in storage (m ²)
		1 storey dwellings	2 storey dwellings	3 storey dwellings	
1b	1p	39 (37)*			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0

Notes to Table 3.3

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

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

The nationally described space standard sets a minimum ceiling height of 2.3 meters for at least 75% of the gross internal area of the dwelling. To address the unique heat island effect of London and the distinct density and flatted nature of most of its residential development, a minimum ceiling height of 2.5m for at least 75% of the gross internal area is strongly encouraged so that new housing is of adequate quality, especially in terms of light, ventilation and sense of space.

⁵⁷ New dwellings in this context includes new build, conversion and change of use

- 3.32 Securing new housing of the highest quality and protecting and enhancing residential neighbourhoods are key Mayoral priorities. The number of new homes needed to 2036 will create new challenges for private developers and affordable homes providers, but also brings unique opportunities for new housing which will be remembered as attractive, spacious, safe and green and which help to shape sustainable neighbourhoods with distinct and positive identities.
- 3.32A Since 2011 the London Plan has provided the basis for a range of housing standards that address the housing needs of Londoners and these are brought together in the Housing Supplementary Planning Guidance (SPG). The options and process recently provided by Government aim to improve the quality of housing nationally⁵³ and provide an opportunity to reinforce the status of the standards already in place for London. They have been consolidated and tested to ensure that they are sound in terms of need and viability.
- 3.33 New housing development should address the wider concerns of this Plan to protect and enhance the environment of London as a whole. New development, including that on garden land and that associated with basement extensions, should avoid having an adverse impact on sites of European importance for nature conservation either directly or indirectly, including through increased recreation pressure on these sites. New development should also take account of the Plan's more general design principles (policies 7.2 to 7.12) and those on neighbourhoods (Policy 7.1), housing choice (Policy 3.8), sustainable design and construction (Policy 5.3), as well as those on climate change (Chapter 5), play provision (Policy 3.6), biodiversity (Policy 7.19), and flood risk (Policy 5.12).
- 3.34 Directly and indirectly back gardens play important roles in addressing many of these policy concerns, as well as being a much cherished part of the London townscape contributing to communities' sense of place and quality of life. Pressure for new housing means that they can be threatened by inappropriate development and their loss can cause significant local concern. This Plan therefore supports development plan-led presumptions against development on back-gardens where locally justified by a sound local evidence base. Such a presumption has been taken into account in setting the Plan's housing target⁵⁴. The London-wide SHLAA assumed a theoretical reduction of 90% in the historic level of garden development, so there is no strategic housing land availability obstacle to the formulation of relevant DPD policies that seek to protect back gardens or other private residential gardens from housing development. Local approaches to the surfacing of front gardens should also reflect the broader policies of this Plan, including the need for such surfaces to be permeable, subject to permitted development rights⁵⁵.

53 New national technical standards, Eric Pickles written statement to Parliament 25 March 2015: "Steps the government is taking to streamline the planning system, protect the environment, support economic growth and assist locally-led decision-making."

54 CLG NPPF 2012 op cit paras 43, 53

55 CLG, Guidance on the Permeable Surfacing of Front Gardens, CLG, 2009

- 3.35 The quality of individual homes and their neighbourhoods is the product of detailed and local design requirements but the implementation of these across London has led to too many housing schemes in London being of variable quality. The cumulative effect of poor quality homes, and the citywide benefits improved standards bring, means this is a strategic issue and properly a concern of the London Plan. Addressing these issues is an important element of achieving the Mayor's vision and detailed objectives for London and its neighbourhoods set out in Chapter One.
- 3.36 The Mayor regards the relative size of all new homes in London to be a key element of this strategic issue and therefore has adopted the Nationally Described Space Standard⁶¹. Table 3.3 sets out minimum space standards for dwellings of different sizes. This is based on the minimum gross internal floor area (GIA) required for new homes relative to the number of occupants and taking into account commonly required furniture and the spaces needed for different activities and moving around. This means developers should state the number of bedspaces/ occupiers a home is designed to accommodate rather than, say, simply the number of bedrooms. These are minimum standards which developers are encouraged to exceed. When designing homes for more than eight persons/bedspaces, developers should allow approximately 10 sq m per extra bedspace/person. Single person dwellings of less than 37 square metres may be permitted if the development proposal is demonstrated to be of exemplary design and contributes to achievement of other objectives and policies of this Plan.
- 3.37 Other aspects of housing design are also important to improving the attractiveness of new homes as well as being central to the Mayor's wider objectives to improve the quality of Londoners' environment. To address these he has produced guidance on the implementation of Policy 3.5 for all housing tenures in his Housing SPG, drawing on his design guide for affordable housing⁶².
- 3.38 At the neighbourhood level this SPG addresses the relationship between strategic density Policy (3.4) and different local approaches to its implementation; the spaces between and around buildings; urban layout; enclosure; ensuring homes are laid out to form a coherent pattern of streets and blocks; public, communal and private open spaces; and the ways these relate to each other and neighbourhoods as a whole. It will respond to the needs of an ageing population by including the principles for inclusive design and those to develop and extend Lifetime Neighbourhoods set out in Policies 7.1 and 7.2.
- 3.39 For individual dwellings the SPG covers issues such as 'arrival' - including the importance of creating active frontages, accommodating footpaths and entrances and shared circulation spaces; size and layout including room space standards as well as the dwelling space standards set out in Table 3.3; the home as a 'place of retreat' (especially important in higher density development); meeting the

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

62 Mayor of London, London Housing Design Guide (LHDG) 2010 - this has been replaced by the 2016 Housing SPG