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**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.

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## 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.<sup>37</sup> 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 equality<sup>38</sup> 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

<sup>37</sup> Equality Act 2010

<sup>38</sup> 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.<sup>39</sup>

- 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 7.18 (local open space).

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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

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**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 Health issues in Planning.

- 3.8 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 Strategies<sup>40</sup>. 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

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

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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 Planning<sup>41</sup> 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.<sup>42</sup> 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)<sup>43</sup> and London's housing land capacity as identified through its 2013 Strategic Housing Land Availability Assessment (SHLAA)<sup>44</sup>. 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 million<sup>45</sup> 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.

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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

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- 3.16b 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 SHMA<sup>46</sup> which draws on government guidance<sup>47</sup> 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'<sup>48</sup>, not least its central dictum that resultant development must be sustainable. The SHLAA methodology<sup>49</sup> 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 nationally<sup>50</sup>.

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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

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**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

- 3.17A 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.
- 3.17B 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 year<sup>51</sup>. The greatest challenge is in translating this capacity into completions. As independent research has shown<sup>52</sup>, 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 Framework<sup>53</sup>. Of particular importance in this regard is the overarching national objective to secure sustainable development<sup>54</sup> and the need to secure actual delivery<sup>55</sup>. 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.

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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

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- 3.19i 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 London<sup>1</sup> which will enhance the environment, improve housing choice and affordability and provide

<sup>1</sup> 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.

- 3.24 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 LDFs<sup>56</sup>. 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.

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56 CLG NPPF 2012 op cit para 58

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**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/hr	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 adaptability<sup>1</sup>, minimum space standards<sup>2</sup> including those set out in Table 3.3, and water efficiency.<sup>3</sup> 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 process<sup>4</sup>.

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 dwellings<sup>57</sup>**

Number of bedrooms	Number of bed spaces	Minimum GIA (m2)			Built-in storage (m2)
		1 storey dwellings	2 storey dwellings	3 storey dwellings	
1b	1p	39 (37)*			1.0
	2p	50	58		1.5
2b	3p	61	70		2.0
	4p	70	79		
3b	4p	74	84	90	2.5
	5p	86	93	99	
	6p	95	102	108	
4b	5p	90	97	103	3.0
	6p	99	106	112	
	7p	108	115	121	
	8p	117	124	130	
5b	6p	103	110	116	3.5
	7p	112	119	125	
	8p	121	128	134	
6b	7p	116	123	129	4.0

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 39m<sup>2</sup> to 37m<sup>2</sup>, 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 (m<sup>2</sup>).

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.

<sup>57</sup> 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 nationally<sup>58</sup> 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 target<sup>59</sup>. 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 rights<sup>60</sup>.

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58 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."

59 CLG NPPF 2012 op cit paras 48, 53

60 CLG. Guidance on the Permeable Surfacing of Front Gardens. CLG, 2009

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- 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 Standard<sup>61</sup>. 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 housing<sup>62</sup>.
- 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

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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

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challenges of a changing climate by ensuring homes are suitable for warmer summers and wetter winters, and mitigating the extent of future change; and ensuring easy adaptation to meet the changing and diverse needs of occupiers over their lifetimes. The importance of an effective design process to make sure that the quality of schemes is not compromised as the development proceeds will also be highlighted. This guidance provides a strategic, functional basis for a new vernacular in London's domestic architecture which also places greater weight on complementing and enhancing local context and character.

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

#### **Strategic**

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

#### **Planning decisions**

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

#### **LDF preparation**

- C Boroughs should:
- a undertake audits of existing play and informal recreation provision and assessments of need in their areas, considering the qualitative, quantitative and accessibility elements of play and informal recreation facilities
  - b produce strategies on play and informal recreation supported by LDF policies to improve access, safety and opportunity for all children and young people in their area.

- 3.40 In a densely urbanised city like London, safe and stimulating play facilities are essential for a child's welfare and future development<sup>63</sup>, as well as preventing health problems such as obesity. However, many children still do not have adequate access to such facilities and some existing provision can be unsuitable. LDFs should address this by providing policies on play provision, including the need for high quality design. Through the development of play strategies, boroughs should ensure the integration of play provision into overall open space

63 CLG NPPF 2012 op cit para 50

strategies. Particular consideration should be given to consultation with children and young people in the design of new provision to understand their changing needs. Appropriate provision should be included for different age groups, including consideration of communal space, roof gardens, indoor space for young children and youth-facilities for young people. Appropriate arrangements for management and maintenance of play and communal facilities should be provided. Wherever possible, playspace should include grassed or wooded areas. School playing fields also provide an important contribution to high quality play spaces (Policy 3.18).

- 3.41 New development including housing should make provision for playspace. This should normally be made on-site and in accordance with LDF play policies for the area. Where development is to be phased, there should be early implementation of the play space. Off-site provision, including the creation of new facilities, improvements to existing provision and an appropriate financial contribution secured by legal agreement towards this provision may be acceptable where it can be demonstrated that it fully satisfies the needs of the development whilst continuing to meet the needs of existing residents.

### **POLICY 3.7 LARGE RESIDENTIAL DEVELOPMENTS**

#### **Strategic, planning decisions and LDF preparation**

- A Proposals for large residential developments including complementary non-residential uses are encouraged in areas of high public transport accessibility.
- B Those on sites of over five hectares or capable of accommodating more than 500 dwellings should be progressed through an appropriately plan-led process to encourage higher densities and coordinate where necessary provision of social, environmental and other infrastructure and create neighbourhoods with a distinctive character, sense of local pride and civic identity in line with Chapter 7. The planning of these areas should take place with the engagement of local communities and other stakeholders.

- 3.42 Large new developments are planned to make a significant contribution to meeting housing need, and their scale means they have particular potential to define their own characteristics and accommodate higher density development in line with Policy 3.4. Guidance on densities above those outlined in Table 3.2 is set out in the Housing SPG. Large sites provide opportunities to create particularly attractive neighbourhoods with distinctive identities, a good quality public realm (Policy 7.5) and the critical mass to support social, physical and environmental infrastructure and provide employment opportunities<sup>64</sup>. For these new neighbourhoods to be successful, it is essential that they become places where

64 CLG NPPF 2012 op cit para 52

people choose to live and work. A co-ordinated approach to their development is essential.

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

- the relationships between the pattern and scale of development and movement within the site, with adjacent areas, and connections with the wider transport network. The highest development densities and most varied mixes of uses should be located where there is the highest public transport accessibility. Planning from the outset for desire line based permeability for pedestrians and cyclists and minimising car dependence will be particularly important;
- other linkages with neighbouring areas so that the new development is designed to be firmly embedded within the wider community. This will require close coordination with service providers as well as existing community organisations (Policy 7.1);
- social infrastructure provision (see Policies 3.16–3.19) with particular attention being paid to access to health, education and other essential services, appropriately phased and coordinated with provision in neighbouring areas so that the development is attractive from the outset as well as being fully sustainable when completed, and takes account of Lifetime Neighbourhood criteria and inclusive design principles (Policies 7.1 and 7.2); and
- the opportunities large scale development provide for decentralised energy generation and provision, sustainable design and construction and coordinated neighbourhood management, especially in securing and maintaining a high quality public realm, safety measures, planting and open space and play provision.

## **POLICY 3.8 HOUSING CHOICE**

### **Strategic**

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

### **LDF preparation and planning decisions**

B To inform local application of Policy 3.3 on housing supply and taking account of housing requirements identified at regional, sub-regional and local levels, boroughs should work with the Mayor and local communities to identify the range of needs likely to arise within their areas and ensure that:

- a new developments offer a range of housing choices, in terms of the mix of housing sizes and types, taking account of the housing requirements of different groups and the changing roles of different

sectors in meeting these

- a1 the planning system provides positive and practical support to sustain the contribution of the Private Rented Sector (PRS) in addressing housing needs and increasing housing delivery
- b provision of affordable family housing is addressed as a strategic priority in LDF policies
- c ninety percent of new housing<sup>1</sup> meets Building Regulation requirement M4 (2) 'accessible and adaptable dwellings'
- d ten per cent of new housing<sup>2</sup> meets Building Regulation requirement M4 (3) 'wheelchair user dwellings', i.e. is designed to be wheelchair accessible, or easily adaptable for residents who are wheelchair users
- e account is taken of the changing age structure of London's population and, in particular, the varied needs of older Londoners, including for supported and affordable provision
- f account is taken of the needs of particular communities with large families
- g other supported housing needs are identified authoritatively and co-ordinated action is taken to address them in LDF and other relevant plans and strategies
- h strategic and local requirements for student housing meeting a demonstrable need are addressed by working closely with stakeholders in higher and further education and without compromising capacity for conventional homes.
- i the accommodation requirements of gypsies and travellers (including travelling show people) are identified and addressed, with sites identified in line with national policy, in coordination with neighbouring boroughs and districts as appropriate.
- j appropriate provision is made for the accommodation of service families and custom build, having regard to local need.

<sup>1</sup> Unlike the other standards in this Plan, Part M of the Building Regulations generally does not apply to dwellings resulting from a conversion or a change of use. Additional guidance on the applicable requirements of the Building Regulations (amended 2015) can be found in: Approved Document M Access to and use of buildings Volume 1: Dwellings.

<sup>2</sup> *ibid*

3.44 Within the broad 20 year requirement for 464,000 (23,200 a year) more market homes and for 512,000 (25,600 a year), additional affordable homes<sup>65</sup>, the Mayor is committed to promoting a real choice of homes for Londoners across the range of tenures to meet their needs at prices they can afford. The SHMA demonstrates the diversity and complexity of London's housing requirements. There is significant need for affordable family homes, and those that meet the requirements of smaller

<sup>65</sup> Mayor of London. SHMA 2014 op cit

households, as well as more specialist needs such as those of London's growing numbers of older people. Different tenures will have particular roles in meeting these requirements, with renting as well as owner occupation playing an important part in the private sector and, in the affordable sector, a more diverse range of intermediate housing products providing greater flexibility for movement between tenures and the affordable rent product to address the same housing needs as social rented housing<sup>66</sup>. The Mayor's London Housing Strategy provides guidance on the housing management measures and short to medium term investment which will help underpin this.

- 3.45 These requirements across London have little regard to administrative boundaries. It is essential that new provision anticipated in LDFs reflects strategic as well as local needs. This will require close working between the GLA and boroughs to ensure local, sub regional and the London wide SHMAs are co-ordinated and that effective account is taken of sub-regional and strategic needs, especially when setting affordable borough housing targets. To support this process, the Mayor is already engaging with boroughs and sub-regional and local Housing Market Partnerships. He will provide supplementary guidance through his London Housing Strategy and other strategic documents to inform and support co-ordination of their approaches to meeting strategic as well as local needs for different types of housing, and local implementation of the strategic affordable housing target, including the breakdown between social/affordable rented and intermediate housing (Policy 3.11). This will be informed by and co-ordinated with allocation of short to medium term affordable housing investment devolving from the London Housing Strategy.
- 3.47 The London SHMA and other evidence shows that failure to provide enough larger homes has seen the number of overcrowded households in London grow by around 100,000 in the decade to 2011/12. There is a particular need for social/affordable rented family homes. Boroughs' local and sub-regional SHMAs may identify local variations which depart from the broad patterns of need identified in the London wide SHMA to be addressed in LDFs, such as neighbourhoods with communities which have a higher proportion of larger households, taking into account the scope for extending smaller properties currently occupied by these groups.
- 3.48 Many households in London already require accessible or adapted housing in order to lead dignified and independent lives: 28,000 are attempting to move to somewhere more suitable to cope with a disability and more than 267,000 need a home adaption<sup>67</sup>. More Londoners are living longer and more older people are choosing to remain in their own homes rather than go into residential institutions. To address these and future needs, 90 per cent of London's new build housing<sup>68</sup>

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66 CLG, HCA. 2011-15 Affordable Homes Programme – Framework. CLG, 2011

67 GLA. Analysis of English Housing Survey 2011/12

68 Unlike the other standards in this Plan, Part M of the Building Regulations generally does not apply to dwellings resulting from a conversion or a change of use

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should be built to Building Regulation requirement 'M4 (2): Accessible and adaptable dwellings'<sup>69</sup> and the remaining 10 per cent of new build housing<sup>70</sup> should be built to Building Regulation requirement 'M4 (3): Wheelchair user dwellings'<sup>71</sup>. LDF policy departures from these requirements must be justified by authoritative evidence from local needs assessments.

- 3.48A As set out in Approved Document M of the Building Regulations - Volume 1: Dwellings, to comply with requirement M4 (2), step free access must be provided. Generally this will require a lift where a dwelling is accessed above or below the entrance storey. The application of requirement M4 (2) has particular implications for blocks of four storeys or less, where historically the London Plan has not required lifts. Boroughs should seek to ensure that dwellings accessed above or below the entrance storey in buildings of four storeys or less have step-free access. However, for these types of buildings this requirement may be subject to development-specific viability assessments and consideration should be given to the implication of ongoing maintenance costs on the affordability of service charges for residents. Where such assessments demonstrate that the inclusion of a lift would make the scheme unviable or mean that service charges are not affordable for intended residents, the units above or below the ground floor that cannot provide step free access would only need to satisfy the requirements of M4(1) of the Building Regulations. All other standards should be applied as set out in this Plan. Further guidance is provided in the Housing SPG.
- 3.49 Boroughs should undertake assessments of the short and longer term supported housing needs of vulnerable and disadvantaged groups, taking account of the wide range of requirements which will arise as London's population ages, the importance of continuity of care, and access to family and friendship networks as well as statutory responsibilities for care.
- 3.49A The requirement for 'wheelchair user dwellings' applies to all tenures. However part M4 (3) of the Building Regulations regarding 'wheelchair user dwellings' distinguishes between 'wheelchair accessible' (a home readily useable 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 household including wheelchair users). The Planning Practice Guidance<sup>72</sup> 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. Boroughs should therefore specifically assess the level of need for wheelchair accessible dwellings and identify this in their LDF policies.
- 3.50 The Mayor has identified the growing and changing requirements for housing

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

70 Unlike the other standards in this Plan, Part M of the Building Regulations generally does not apply to dwellings resulting from a conversion or a change of use

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

72 The Planning Practice Guidance (Housing- Optional Technical Standards) Paragraph: 009 Reference ID: 56-009-20150327 DCLG Revision date: 27 03 2015

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older people in London as one of the most important emerging planning issues for London. It is anticipated that between 2011 and 2036 'over 65s' could increase by 64% and 'over 90s' could grow in number by 89,000.

- 3.50A Most older Londoners are likely to prefer to remain in their own homes, and some will require support to enable them to do so. It is important that new development expands this choice for existing and future generations of older Londoners. Policy 3.5 on housing quality and its associated housing standards<sup>73</sup> will play a key role in extending choice by ensuring 90 percent of new dwellings are 'accessible and adaptable dwellings' and ensuring that 10% are wheelchair user dwellings<sup>74</sup>. More generally, London's changing urban environment must respond positively to the needs of an ageing population, including through the principles for inclusive design and those to develop and extend Lifetime Neighbourhoods set out in Policies 7.1 and 7.2.
- 3.50B Research suggests that the choices (see Glossary) open to older Londoners to move into local specialist housing may have been constrained through inadequate supply. Extending these choices through a higher level of specialist provision will in turn free up larger homes for family occupation. Over the period 2015 – 2025 older Londoners may require 3,600 – 4,200 new specialist units per annum. At the mid-point of this range, these might be broken down broadly into 2,600 private units pa, 1,000 in shared ownership and some 300 new affordable units. There may also be a requirement for 400 - 500 new bedspaces pa in care homes<sup>75</sup>. The draft London Housing Strategy<sup>76</sup> sets out proposals for investment and partnership working to support this provision.
- 3.50C Boroughs should demonstrate in their LDFs and other relevant strategies and plans how they have identified and addressed the local expression of these strategic needs including through targets and performance indicators. These should be informed by the indicative requirement benchmarks set out in Annex A5: Specialist housing for older people. Boroughs should work proactively with providers of specialist accommodation for older people to identify and bring forward appropriate sites, taking particular account of potential capacity anticipated from housing led, high density, mixed use redevelopment of town centres (see Policy 2.15). Both should work with registered providers and other relevant partners to support the provision of additional 'intermediate' models of housing. In order to widen the choice of residential environments for older people, boroughs should also encourage 'mainstream' housing developers to extend their product range to meet specialist needs. More generally, it is important that viability assessments take into account the distinct economics of specialist housing and care home provision.

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73 Mayor of London. Housing Supplementary Planning Guidance. GLA, 2016

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

75 Cambridge Centre for Housing & Planning Research, Three Dragons, Land Use Consultants. The role of the planning system in delivering housing choice for older Londoners. Report for the GLA, GLA, 2012. Update GLA 2013

76 Mayor of London. Homes for London. The London Housing Strategy. Draft for Consultation. GLA, 2013

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- 3.50D Through his role as Chair of the London Health Board the Mayor will promote recognition of the importance of decent housing for older Londoners as a strategic health issue. He will encourage the Health and Wellbeing Boards to address this, especially through coordination of social and other services to enable older people to remain in their homes. He will also encourage the London Health Commission to take it into account when reviewing health and care service resources<sup>77</sup>.
- 3.50E The Housing SPG provides guidance on implementation of this policy to help ensure the highest quality of life for older people. The glossary to this Plan and the SPG provide guidance on the different types of specialist accommodation and the SPG outlines innovative approaches and initiatives to meet need, ranging from supported independent living through the promotion of lifetime neighbourhoods, accommodation with some linked care and services, and more specialist care accommodation.
- 3.51 In view of the scale of the projected growth in London's older population and the housing affordability issues it raises, this Plan supports boroughs in seeking application of the principles of its affordable housing policies (policies 3.10-3.13) to the range of developments – including those falling within Use Class C2 – which cater specifically for older people. These principles include taking account of site circumstances, development viability, needs assessments and availability of development capacity and relevant public subsidy; the need to encourage rather than restrain residential development and to promote mixed and balanced communities and circumstances where 'off-site' contributions, 'contingent obligations' or other phasing measures may be appropriate. The way in which these principles can be applied most effectively will vary with local circumstances and will require close integration between planning and other borough strategies to meet social needs. Such an integrated approach will also be required to address the needs of other groups which may require accommodation-based, supported care services such as hostels, refuges and foyers, as well as housing needs connected with particular types of occupation e.g. health workers, police, hotel staff.
- 3.52 London's universities make a significant contribution to its economy and labour market (Policies 3.18 and 4.10). It is important that their attractiveness and potential growth are not compromised by inadequate provision for new student accommodation. While there is uncertainty over future growth in the London student population and its specialist accommodation needs, including the unmet demand, there could be a requirement for some 20,000 – 31,000 places over the 10 years to 2025<sup>78</sup>. New provision may also tend to reduce pressure on other elements of the housing stock currently occupied by students, especially in the

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

78 Mayor's Academic Forum. Strategic planning issues for student housing in London. Recommendations. 2014. GLA

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private rented sector. The SHLAA has identified a pipeline of circa 20,000 student bed spaces 2015–2025.

- 3.53 Addressing these demands should not compromise capacity to meet the need for conventional dwellings, especially affordable family homes, or undermine policy to secure mixed and balanced communities. This may raise particular challenges locally, and especially in four central London boroughs<sup>79</sup> where 57% of provision for new student accommodation has been concentrated<sup>80</sup>.
- 3.53A In addressing the need for specialist student housing, the Mayor will support proactive, partnership working by boroughs, universities, developers and other relevant bodies, including through his Academic Forum, to:
- encourage a more dispersed distribution of future provision taking into account development and regeneration potential in accessible locations away from the areas of greatest concentration in central London, especially that anticipated from housing led, high density, mixed use redevelopment of town centres (see Policy 2.15);
  - secure accommodation which is more affordable for the student body as a whole; and
  - ensure that in identifying and addressing local and strategic needs<sup>81</sup> for student accommodation, boroughs are informed by working with other relevant partners as indicated above.
- 3.53B Student accommodation should be secured as such by planning agreement or condition relating to the use of the land or to its occupation by members of specified educational institutions. Where there is not an undertaking with a specified academic institution(s), providers should, subject to viability, deliver an element of student accommodation that is affordable for students in the context of average student incomes and rents for broadly comparable accommodation provided by London universities. Information on this will be provided through the Mayor's Academic Forum in the London Plan Annual Monitoring Reports. Guidance on how such accommodation should be defined, delivered and retained will be provided in Supplementary Planning Guidance.
- 3.53C If the accommodation is not robustly secured for students, it will normally be subject to the requirements of affordable housing policy (policies 3.10-3.13). While student accommodation is accounted as part of overall housing provision, it should be monitored separately because it meets distinct needs. Because of uncertainty over future demand/supply relationships the monitoring process must have particular regard to these.
- 3.54 Private renting (PRS) is the only housing sector to have shown relative growth

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79 Islington, Tower Hamlets, Southwark and Camden

80 Mayor's Academic Forum. 2014. op cit

81 'Strategic needs' means a demonstrable need generated by institutions located beyond the boundaries of boroughs where development is proposed.

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in recent years and is set to play an increasingly important role in meeting Londoners' diverse housing requirements. One in four London households now live in the sector and around two thirds of the one in eight of households in London that move home each year move into or within it. The planning system must take a more positive approach in enabling this sector to contribute to achievement of housing targets. Montague's<sup>82</sup> recommendations and the Mayor's London Housing Strategy show how covenanted PRS can contribute towards this. Viability tests of covenanted PRS proposals should take account of the distinct economics of this type of PRS, as suggested by the Government's Beta guidance<sup>83</sup>.

- 3.54B The Mayor will continue to work with institutional investors to encourage greater institutional involvement, more professional and less fragmented management, greater stability, high quality standards and, potentially, longer term rental periods and affordable homes for rent. More generally, the planning system should complement policies in the London Housing Strategy to support growth in private renting where this will result in well managed, good quality accommodation, mixed and balanced communities and sustainable neighbourhoods.
- 3.55 Shared accommodation or houses in multiple occupation is a strategically important part of London's housing offer, meeting distinct needs and reducing pressure on other elements of the housing stock, though its quality can give rise to concern. Where it is of reasonable standard it 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 houses in multiple occupation.
- 3.56 People from different communities should be free to lead their lives in different ways, subject to the need for mutual respect and responsibility. The Mayor is clear that the planning system should ensure fairness between the settled and traveller communities. It is his view that assessing levels of genuine local need, deciding on the level and location of suitable provision to meet that need and carrying out the necessary consultation with relevant communities and stakeholders is far more effectively done locally. Both because of the level of locally-specific detail involved, and the scale of the issue (relative to London's other strategic housing needs), the Mayor agrees with national Government that boroughs should work with gypsies and travellers and other stakeholders to identify local needs for temporary and permanent sites, and develop and effective strategies to meet need through the identification of land for sites through their LDFs as set out in accordance with national guidance<sup>84</sup>.
- 3.57 National guidance requires boroughs to identify, and keep updated a supply of:

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

83 DCLG. Beta draft National Planning Practice Guidance. Viability: how should viability be assessed in decision-taking (accessed 29th October 2013).

84 CLG. Planning policy for travellers sites. March 2012

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- deliverable sites to provide five years' worth of sites against their locally set targets
- developable sites or broad locations for growth for years 6-10 and, where possible, for years 11-15

with the number of pitches or plots related to the circumstances of the specific size and location of the site and its surrounding population's size and density<sup>85</sup>. They should ensure that traveller sites are sustainable economically, socially and environmentally<sup>86</sup>.

- 3.57A The SHMA identifies the need for housing for service families and people wishing to build their own homes to support Policy 3.8<sup>87</sup>. The Mayor has refined the national housing strategy's support for 'custom build' and the 'community right to build'<sup>88</sup>, by supporting this through his 'Build Your Own Home – The London Way' programme. The Mayor is keen to work with local communities and other partners to expand the concept so self build can be developed on a greater scale, and make a significant contribution to the evolution of a London vernacular<sup>89</sup>.
- 3.57B Government's approach to meeting the needs of service personnel and their families is essentially through the housing allocations process. However, it suggests that self build may provide particular opportunities for members of this group to access owner occupation.

### **POLICY 3.9 MIXED AND BALANCED COMMUNITIES**

#### **Strategic**

- A Communities mixed and balanced by tenure and household income should be promoted across London through incremental small scale as well as larger scale developments which foster social diversity, redress social exclusion and strengthen communities' sense of responsibility for, and identity with, their neighbourhoods. They must be supported by effective and attractive design, adequate infrastructure and an enhanced environment.
- B A more balanced mix of tenures should be sought in all parts of London, particularly in some neighbourhoods where social renting predominates and there are concentrations of deprivation

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85 Ibid, paragraph 9

86 Ibid, paragraph 11

87 As required by para 50 of the NPPF

88 HM Government. Laying the Foundations: A Housing Strategy for England. CLG, 2011

HCA CLG. Custom Build Homes Fund Prospectus. HCA, 2012

89 Mayor of London. Build Your Own Home – The London Way. Supporting Custom Built Housing and Community Right to Build. Funding Prospectus. GLA, 2012

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- 3.58 The Mayor is concerned that there should be no segregation of London's population by housing tenure. London's legacy of mono-tenure estates has in some cases contributed to concentrations of deprivation and worklessness. Coupled with some housing trends and management practices, these have been exacerbated by the tendency for new social housing to be built in the areas where it is already concentrated. Conversely, market homes have tended to be developed in areas with very little social housing<sup>90</sup>. The affordable rent product should be applied so as to help achieve the objectives of this Policy. Local Authorities' allocation policies, tenancy strategies and homelessness strategies will also be important tools in delivering this aim.
- 3.59 The London Housing Strategy outlines how management and investment in mono-tenure estates can contribute to the creation of more mixed and balanced communities. The planning system should support this process. Infill schemes in predominantly social housing estates should primarily be targeted for intermediate and market housing. New social housing development should be encouraged in areas where it is currently under represented. These are essentially local matters for boroughs to address in light of their local circumstances because the key concern is the concentrations of deprivation in individual, or groups, of mono-tenure estates rather than the overall level of social renting in a borough.
- 3.60 Policy 3.5 requires the design of new development to help create a more socially inclusive London. The Housing SPG provides guidance on implementing this policy including support for boroughs to resist forms of development which might compromise it, such as gated communities.

## Affordable Housing

### POLICY 3.10 DEFINITION OF AFFORDABLE HOUSING

#### Strategic and LDF preparation

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

- 3.61 Within this overarching definition:
- **social rented housing** should meet the criteria outlined in Policy 3.10 and be owned by local authorities or private registered providers, for which guideline

<sup>90</sup> Mayor of London LHS 2010 op cit

target rents are determined through the national rent regime. It may also be owned by other persons and provided under equivalent rental arrangements to the above, as agreed with the local authority or with the Mayor.

- **affordable rented housing** should meet the criteria outlined in Policy 3.10 and be let by local authorities or private registered providers of social housing to households who are eligible for social rented housing. Affordable Rent is subject to rent controls that require a rent of no more than 80% of the local market rent (including service charges, where applicable).<sup>91</sup> In practice, the rent required will vary for each scheme with levels set by agreement between developers, providers and the Mayor through his housing investment function. In respect of individual schemes not funded by the Mayor, the London boroughs will take the lead in conjunction with relevant stakeholders, including the Mayor as appropriate, but in all cases particular regard should be had to the availability of resources, the need to maximise provision and the principles set out in policies 3.11 and 3.12.
- **intermediate** housing should meet the criteria outlined in Policy 3.10 and be homes available for sale or rent at a cost above social rent, but below market levels. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rent. Households whose annual income is in the range £18,100–£66,000 should be eligible for new intermediate homes. For homes with more than two bedrooms, which are particularly suitable for families, the upper end of this eligibility range will be extended to £80,000. These figures will be updated annually in the London Plan Annual Monitoring Report.

**Market housing** is defined separately as private housing for rent or sale where the price is set in the open market.

- 3.62 To understand London's distinct housing needs and to take account of government guidance to "identify the scale and mix of housing that the local population is likely to need over the plan period which addresses the need for all types of housing, including affordable housing<sup>92</sup>", it must be recognised that lower quartile house prices in London are 74 per cent higher than in the country as a whole, 30 per cent higher than in the South East region and 50 per cent higher than in the East of England<sup>93</sup>. Increased provision of intermediate housing is one of the ways in which the supply of affordable housing can be expanded. The Mayor will work with the Boroughs and other delivery and funding agencies to develop understanding and provision of a range of relevant products, particularly for families. For the purposes of the paragraph 3.61 definition, eligibility criteria for intermediate housing may be set locally to recognise the individual characteristics of local housing markets but should not compromise Policy 3.11 to maximise

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91 CLG. National Planning Policy Framework (NPPF). CLG, 2012

92 CLG. NPPF 2011 op cit para 159

93 Lower Quartile House Prices (land registry) 2011

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affordable housing provision. In the absence of local eligibility criteria, in order to recognise strategic housing needs in the particular circumstances of London, the Mayor will seek to ensure that households whose annual income is in the range £18,100-£66,000 should be eligible for new intermediate homes. For family homes (see Glossary) the upper end of this range will be extended to £80,000. These figures will be up-dated annually in the London Plan Annual Monitoring Report. If boroughs wish to set eligibility criteria for intermediate housing below these levels, planning conditions or agreements should secure them at the reduced levels for no more than three months from the point of initial marketing (whether that be when new or at re-sale or re-let) and they should then be offered without further restrictions to those who meet the London-wide eligibility criteria as set out in the London Housing Strategy.

- 3.63 In view of the particular priority the Mayor gives to provision of new affordable homes to meet London's very pressing need, boroughs should give particular weight to the criteria set by national government for the allocation of public resources for affordable housing in setting local plan targets (Policy 3.11) or negotiating provision in private housing or mixed use developments (Policy 3.12) and should avoid imposing any requirements (such as borough-level caps on rent levels for affordable rented housing) that might restrict the numbers of new affordable homes.

### **POLICY 3.11 AFFORDABLE HOUSING TARGETS**

#### **Strategic**

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

#### **LDF preparation**

- B Boroughs should set an overall target in LDFs for the amount of affordable housing provision needed over the plan period in their areas and separate targets for

- social/affordable rented; and
- intermediate

housing and reflect the strategic priority accorded to provision of affordable family housing and to making the best use of available resources to maximise affordable housing output.

- C LDF affordable housing targets should take account of:

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

3.64 The London SHMA<sup>94</sup> demonstrates that the high cost of market housing in London makes affordable housing particularly important in meeting housing needs. The SHMA seeks to address the key relationships between incomes and housing costs as well as demographic trends, voluntary sharing and tackling unmet need to 2036. Of the overall average annual housing requirement, it suggests that approximately 25,600 should be affordable (see paragraph 3.44, above). However, when setting an affordable housing target account must also be taken of the deliverability of these homes. Affordable housing funding over the full term of this Plan is not known. Based on the funding that was available and the record of delivery of affordable homes over recent years, the housing need requirement and taking into account the housing supply target, an average of 17,000 additional affordable homes per annum has been set as the strategic target for the term of the Plan. This will be monitored closely, especially in light of changing economic conditions and its adoption will not compromise delivery of a higher number.

3.65 Derivation of separate targets for social/ affordable rented and intermediate housing has been informed by the SHMA and other relevant factors including the role intermediate housing can play in helping Londoners get a first step on the housing ladder, reducing the call on social/affordable rented housing, freeing up social/affordable rented homes, providing wider housing choices and securing a

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94 Mayor of London. SHMA. 2014. op cit

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more balanced social mix on mono-tenure estates. Account has also been taken of the way intermediate housing development can extend the effectiveness of scarce public resources by increasing overall housing output through partnership working with the private sector.

- 3.66 In light of announced investment patterns<sup>95</sup> and the Government's intention that affordable rent should meet the same housing needs hitherto addressed by social rented housing<sup>96</sup>. The Mayor proposes that as a long term strategic target 60 per cent of new affordable housing should be for social/affordable renting, especially for families, and that 40 per cent should be for the range of intermediate housing products outlined in the London Housing Strategy to meet different needs, including those arising from groups which hitherto have not been able to afford market housing but have been excluded from intermediate housing. The Mayor recognises that these are challenging targets, particularly in current economic conditions, but to meet Londoners' housing needs all stakeholders must engage to achieve them over the term of the Plan
- 3.67 Policy 3.8 outlines arrangements for coordinating local, sub regional and strategic needs assessments so the range of housing requirements can be addressed effectively in London's complex regional housing market. In order to maximise affordable housing provision boroughs should take account of the most robust available assessment of housing capacity including those identified in Policy 3.3, and of potential sources of supply, such as:
- local authority developments, including net gain from estate regeneration
  - affordable housing schemes funded independently of planning contributions from private development
  - affordable housing secured through planning agreements or conditions on private residential or mixed use (including residential) development
  - long term vacant properties brought back into use
  - provision from non-self-contained accommodation.
- 3.68 In setting their affordable housing targets boroughs are required to assess the economic viability of land for housing, taking account of risks to delivery and drawing on informed assessments of public funding and developer contributions. The Mayor has already established close working relationships with the boroughs on affordable housing investment within their areas which will inform this process. Boroughs should enable the range of affordable rents to be applied and should not set rent targets for affordable rented housing in their local development frameworks as this is likely to impede maximisation of affordable housing provision Londonwide. The Mayor may provide details of where variations to Affordable Rent

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95 Mayor of London. A revised London housing strategy – initial proposal. Consultation with the London Assembly and the GLA group. GLA, 2011

96 CLG, HCA 2011 op cit

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can apply in his London Housing Strategy and other relevant documents.

- 3.69 The Mayor will engage with boroughs individually to enable them to set local affordable housing targets which are in general conformity with the London Plan's strategic targets. Supplementary guidance will provide indicative guidance on the approach set out in Policy 3.11 to inform this process. It will also include guidance on local implementation of the strategic social/affordable rent and intermediate target and of the strategic priority for provision of affordable family homes. The Mayor recognises that, in light of local circumstances, boroughs may wish to express their targets in different ways, including in absolute or percentage terms. However the targets are expressed they must be robust in implementing a borough's contribution to the strategic affordable housing targets through the development management process.

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

#### **Planning decisions and LDF preparation**

- A The maximum reasonable amount of affordable housing should be sought when negotiating on individual private residential and mixed use schemes, having regard to:
- a current and future requirements for affordable housing at local and regional levels identified in line with Policies 3.8 3.10 and 3.11 and having particular regard to the guidance provided by the Mayor through the London Housing Strategy, supplementary guidance and the London plan Annual Monitoring Report (see paragraph 3.68)
  - b affordable housing targets adopted inline with Policy 3.11,
  - c the need to encourage rather than restrain residential development (Policy 3.3),
  - d the need to promote mixed and balanced communities (Policy 3.9),
  - e the size and type of affordable housing needed in particular locations,
  - f the specific circumstances of individual sites,
  - g resources available to fund affordable housing, to maximise affordable housing output and the investment criteria set by the Mayor,
  - h the priority to be accorded to provision of affordable family housing in policies 3.8 and 3.11.
- B Negotiations on sites should take account of their individual circumstances including development viability, the availability of public subsidy, the implications of phased development including provisions for re-appraising the viability of schemes prior to implementation ('contingent obligations'), and other scheme requirements.
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C Affordable housing should normally be provided on-site. In exceptional cases where it can be demonstrated robustly that this is not appropriate in terms of the policies in this Plan, it may be provided off-site. A cash in lieu contribution should only be accepted where this would have demonstrable benefits in furthering the affordable housing and other policies in this Plan and should be ring-fenced and, if appropriate, pooled to secure additional affordable housing either on identified sites elsewhere or as part of an agreed programme for provision of affordable housing.

- 3.70 Achievement of a borough's affordable housing target in a particular year should not constrain maximisation of affordable housing output on individual proposals – the target applies for the term of the Plan.
- 3.71 In estimating provision from private residential or mixed use developments, boroughs should take into account economic viability and the most effective use of private and public investment, including the use of developer contributions. To expedite the planning process, developers should engage with a registered provider prior to progressing the scheme and secure from them a commitment to provision. In doing so, they should require the provider to identify the resources it is bringing to the scheme and demonstrate that the proposed affordable housing provision makes optimum use of the resources applied in terms of Policy 3.12, and provides the range of affordable rents indicated in the London Housing Strategy. Developers should provide development appraisals to demonstrate that each scheme provides the maximum reasonable amount of affordable housing output. Boroughs should evaluate these appraisals rigorously, drawing on the GLA development control toolkit<sup>97</sup> and other independent assessments which take account of the individual circumstances of a site, the availability of public subsidy and other scheme requirements. Boroughs are encouraged to review and bring forward surplus land in their own ownership to maximise their contribution to affordable housing provision, including the provision of land to registered providers on a nil cost or discounted basis<sup>98</sup>. The Mayor will provide further detailed guidance on the practical application of this policy.
- 3.72 The Mayor seeks to maximise affordable housing output and expects developers to make the most effective use of available affordable housing resources to achieve this objective. Exceptions to the use of the full amount of available public investment to maximise output should be limited to circumstances where:
- on the highest value sites, at least the maximum level of affordable housing which would normally be achieved with public subsidy can in fact be achieved by funding entirely from development value
  - some circumstances where 'cascade agreements' are put in place to address

97 Affordable Housing Development Control Toolkit. GLA

98 ODPM. Circular 6/2003. Disposal of Land for Less than Best Consideration. ODPM, 2003

uncertainties over the level of grant and amount of affordable housing to be delivered

- types of provision which comply with the definition of affordable housing but are subsidised in other ways such as directly through discounted land sale, or indirectly if they offer exceptional benefits which on balance justify departures from some normal planning requirements.

Supplementary guidance will be provided on these exceptional circumstances.

3.73 The Mayor wishes to encourage, not restrain, overall residential development. Boroughs should take a reasonable and flexible approach to securing affordable housing on a site by site basis. This Plan makes clear that affordable housing provision is a particular priority when securing developer contributions (Policy 8.2).

3.74 Affordable housing provision is normally required on-site. In exceptional circumstances (where a robust justification can be demonstrated for on-site provision being inappropriate in terms of the policies in this Plan) it may be provided off-site, for example as part of a land use 'swap'. Where neither of these options is appropriate a cash in lieu contribution ring fenced, and if appropriate 'pooled', to secure efficient delivery of additional affordable housing on identified sites elsewhere may be accepted. These exceptional circumstances include those where it would be possible to:

- secure a higher level of provision
- better address priority needs, especially for affordable family housing
- secure a more balanced community
- better sustain strategically important clusters of economic activities, especially in parts of CAZ and the north of the Isle of Dogs where it might be part of a land 'swap' or 'housing credit' (Policy 2.11).

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

3.75 In making arrangements for assessing planning obligations, boroughs should consider whether it is appropriate to put in place provisions for re-appraising the viability of schemes prior to implementation. To take account of economic uncertainties, and in respect of schemes presently anticipated to deliver low levels of affordable housing, these provisions may be used to ensure that maximum public benefit is secured over the period of the development.

3.76 The design and quality policies in Policy 3.5 apply in full to affordable housing provision. The Mayor has published more specific guidance<sup>99</sup> on this stressing the

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99 Mayor of London. Housing SPG. GLA 2016

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need for affordable housing to be integrated with the rest of the development and have the same external appearance as other housing.

### **POLICY 3.13 AFFORDABLE HOUSING THRESHOLDS**

#### **Planning decisions and LDF preparation**

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

- 3.77 Small developments make an important contribution to housing provision in London and must continue to help meet London's need for affordable as well as market housing. Affordable housing policy requirements should be applied across all the provision arising from sites which have the capacity to provide 10 or more homes. Boroughs are encouraged to set a lower threshold where appropriate in light of their local circumstances<sup>100</sup>. The capacity of sites should be assessed on the basis of Policy 3.4.
- 3.78 Affordable housing policy should be implemented in circumstances where application of Policy 3.4 to a site or other development opportunity would normally provide capacity for 10 or more homes but a proposal, such as one for larger homes, reduces this output below the affordable housing requirement threshold. Boroughs should ensure that such proposals make an equitable contribution to meeting affordable housing needs by applying affordable housing policy to all the capacity in terms of units which might normally be expected to come forward from the site through application of Policy 3.4. In this process boroughs may wish to draw on the space standards set out in Policy 3.5 and further detail in the Housing SPG. Guidance on affordable housing requirements in connection with provision for older Londoners and student accommodation is included in paragraphs 3.51 and 3.52-3.53B of this Plan.

<sup>100</sup> Thresholds for application of application of affordable housing requirements. GLA and GOL, 2003

## London's Housing Stock

### **POLICY 3.14 EXISTING HOUSING**

#### **Strategic**

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

#### **Planning decisions and LDF preparation**

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

- 3.79 Maintaining and improving the quality and condition of London's stock of 3.4 million homes is a continuing concern to individual Londoners and especially so for some groups. In 2011, 22 per cent of homes across all tenures failed to meet Government's broad Decent Homes Standard, a substantial fall from 36 per cent in 2003 and slightly less than in the country as a whole<sup>101</sup>. The planning system must support the largely managerial and investment based initiatives to target this issue set out in the London Housing Strategy.
- 3.80 Retrofitting of the existing stock to address climate change adaptation and mitigation will be particularly important in this (Policy 5.4). Account should also be taken of Policy 3.8 to provide good quality new accommodation to meet the needs of vulnerable groups for supported housing. In some circumstances this will in turn help support broader measures set out in the London Housing Strategy to reduce under-occupation and make larger homes available for families.
- 3.81 To address London's housing needs and sustain its neighbourhoods, existing housing should be retained where possible and appropriate, except where there are acceptable plans for its replacement. Short term lettings especially for holiday

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<sup>101</sup> Mayor of London. Homes for London, the London Housing Strategy. Draft for consultation November 2013 para 2.7

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lets, can result in a serious loss of housing, and should be resisted. Such lettings require specific planning consent under the Greater London Council (General Powers) Acts 1973 and 1983.

- 3.82 Estate renewal should take into account the regeneration benefits to the local community, the proportion of affordable housing in the surrounding area (see Policy 3.9), and the amount of affordable housing intended to be provided elsewhere in the borough. Where redevelopment of affordable housing is proposed, it should not be permitted unless it is replaced by better quality accommodation, providing at least an equivalent floorspace of affordable housing.
- 3.83 Existing sites and premises providing either an element of care, or dedicated homes for employees such as nurses, police officers or hotel staff, are a finite resource and may be threatened by higher value uses. Where shortfalls of specialist housing needs have been identified (Policy 3.8), the possibility of other providers of specialist or supported needs accommodation using these existing sites and premises should be explored.
- 3.84 The number of empty homes in London has fallen in recent years to 72,100<sup>102</sup> in 2012, the lowest number on record and as a proportion of the total stock well below the national average (2% in London compared to 3% in England as a whole). The number of long term empty homes has also fallen, to 23,870<sup>103</sup>, below the Mayor's target level of 1% of the total stock. Given the scale of housing requirements in London the Mayor is seeking to reduce the level of long term empty homes still further, and the London Housing Strategy sets out measures to achieve this.

### **POLICY 3.15 CO-ORDINATION OF HOUSING DEVELOPMENT AND INVESTMENT**

#### **Planning decisions and LDF preparation**

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

- 3.85 Successful implementation of the housing policies of this Plan will be important to achievement of most of the Mayor's wider objectives for London and will require positive engagement and co-ordination with a very wide range of public, private and voluntary sector stakeholders working to varied timescales and sometimes

<sup>102</sup>DCLG Live Table 615: vacant dwellings by local authority district: England, from 2004 <https://www.gov.uk/government/statistical-data-sets/live-tables-on-dwelling-stock-including-vacants>

<sup>103</sup>Ibid

distinct agendas. As the single most important delivery agencies, boroughs are crucial to this process. The Mayor is committed to working with them through the different parts of the GLA group, which he intends should act in an integrated way, and through the roles he plays in other organisations and partnerships. Where he can add value he will provide strategic support to enable the myriad local initiatives and actions tailored to their local circumstances which are necessary to achieve his broad housing objectives for London. These include social and environmental infrastructure investments through local partnerships, strategies and agreements which are essential to enhancing quality of life for new as well as existing residents.

- 3.85A Research<sup>104</sup> shows that in London the planning process is just one among a range of more significant constraints on housing delivery preventing the translation of planning approvals to completions. However, it can provide a framework for pro-active working to facilitate operation of the market by bringing together land owners, developers, registered providers, the GLA group and other relevant agencies to translate 'developable' and other sites into ones which are more immediately 'deliverable' in the terms of the NPPF. The Mayor is already working to bring forward individual, 'stalled' strategic sites. Boroughs are encouraged to do the same with smaller 'stalled' sites. To facilitate and encourage new development it is important that realistic and sensitive account is taken of its viability when seeking S106 contributions and setting CIL charges<sup>105</sup>.

## Social infrastructure

### **POLICY 3.16 PROTECTION AND ENHANCEMENT OF SOCIAL INFRASTRUCTURE**

#### **Strategic**

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

#### **Planning decisions**

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

<sup>104</sup>Molior London. Barriers to Housing Delivery – what are the market-perceived barriers to residential development in London? GLA 2012

<sup>105</sup>CLG NPPF 2012 op cit 173 - 177

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

### **LDF preparation**

- D LDFs should provide a framework for collaborative engagement with social infrastructure providers and community organisations:
- a for the regular assessment of the need for social infrastructure at the local and sub-regional levels; and
  - b to secure sites for future provision or reorganisation of provision.
- Where appropriate, boroughs are encouraged to develop collaborative cross boundary approaches in the provision and delivery of social infrastructure.
- E Boroughs should ensure that adequate social infrastructure provision is made to support new developments. If the current use of a facility is no longer needed, boroughs should take reasonable steps to identify alternative community uses where the needs have been identified. Adequate provision for social infrastructure is particularly important in areas of major new development and regeneration and should be addressed in opportunity area planning frameworks and other relevant area action plans.
- F The Mayor will work with boroughs, relevant social infrastructure providers and the voluntary and community sector as appropriate to extend proposed supplementary guidance on social infrastructure requirements, especially at the sub-regional and Londonwide levels.

3.86 Social infrastructure covers a wide range of facilities such as health provision, nurseries, schools, colleges and universities, community, cultural (Policy 4.6), play, recreation and sports and leisure facilities, places of worship, fire stations, policing and other criminal justice or community safety facilities and many other uses and activities which contribute to making an area more than just a place to live. At a more local level, other facilities may need to be provided, including play and informal recreation facilities (Policy 3.6), public toilets, drinking water fountains and seating (Policy 7.5). The whole range of social infrastructure has a major role to play in supporting London's expected growth, particularly in places where significant new housing is proposed, such as opportunity and intensification areas (Policy 2.13) making residential areas more attractive and turning them into sustainable neighbourhoods and communities (Policy 7.1). It is therefore essential to plan for high quality social infrastructure alongside development particularly in major new development and regeneration areas<sup>106</sup>.

3.87 Planning for infrastructure in London is complex, with a wide range of providers

<sup>106</sup> Mayor of London. Social Infrastructure. Supplementary Planning Guidance. GLA, 2015

and stakeholders, and various degrees of clarity and opacity around future provision and funding for investment. Policies about, and responsibilities for, provision are subject to significant change. London is a city with a large diversity of neighbourhoods, communities and infrastructure and each area presents its own individual challenges.

3.87A Loss of social infrastructure in areas of defined need may be acceptable if it can be demonstrated that the disposal of assets is part of an agreed programme of social infrastructure re-provision (in health and community safety, for example) to ensure continued delivery of social infrastructure and related services.

3.88 Boroughs and local strategic partnerships have a key role in bringing together the different parts of the public, private, community and voluntary sectors to tackle priority issues including health, education, lifelong learning, community safety, housing and transport infrastructure, and access to social, leisure and cultural activities through community strategies, local strategies and agreements and other policy tools. In doing so, they may wish to develop, where appropriate, collaborative approaches to the provision and delivery of social infrastructure, and apply the following methodology:

- engage all relevant stakeholders and assess relevant policies and strategies;
- identify and analyse existing social infrastructure including its type, location, use, capacity, quality, and accessibility;
- identify future needs using data such as population forecasts, school roll projections, Joint Strategic Needs Assessments, etc;
- identify any gaps in provision and how these could be met;
- identify funding and delivery mechanisms, including opportunities for joint delivery, sources of funding, and identification of potential sites;
- monitor and review the delivery of services and facilities.

Data should be shared between planning authorities and service providers to inform implementation of Policies 3.16-3.19. Open space in all its forms represents an important component of social infrastructure and its protection and enhancement is an integral part of Policy 3.16. The methodology of Policy 3.16 applies to open space, but proposals must also accord other more specific policies, namely 2.18 (green infrastructure), 3.19 (sports facilities including playing fields), 7.16 (Green Belt), 7.17 (MOL) and 7.18 (local open space). Policies in Chapter 7 relating to the Blue Ribbon Network may also be relevant.

3.89 Existing or new developments should, wherever possible, extend the use of facilities to serve the wider community, especially within regeneration and other major development schemes. Shared and extended use of facilities, including those of schools, commercial and community-based organisations can help ensure the effective use of resources and land, encourage joined-up and coherent service delivery and shared maintenance and management costs. It can also

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help minimise travel distances for users and encourage community participation and inclusion. Multi-use community centres that provide flexible and accessible spaces adaptable to communities' needs should be encouraged.

3.90 Boroughs should develop a criteria-based approach to the provision of different types of social infrastructure facilities and the expansion of existing facilities, taking into account the location and layout of facilities. Facilities should be:

- easily accessible to all sections of the community (including disabled people and older people) by meeting inclusive design principles
- easily accessible by walking and cycling
- well connected to public transport
- affordable and compatible with social infrastructure service delivery plans
- well laid out and flexible, so that all the space is used efficiently
- safe and user-friendly
- integrated with or complementing other neighbouring facilities or services as part of achieving a lifetime neighbourhood (Policy 7.1).

For some emergency services infrastructure, good public transport accessibility is not a high priority.

3.91 Voluntary and community groups often find it difficult to find premises suitable for their needs; unused or underused facilities should be brought into use as much as possible to help address their accommodation needs. The additional use or reuse of places of worship should be considered for the purpose of providing accommodation for use by other traditions or other faiths and/or wider community functions.

### **POLICY 3.17 HEALTH AND SOCIAL CARE FACILITIES**

#### **Strategic**

A The Mayor will support the provision of high quality health and social care appropriate for a growing and changing population, particularly in areas of underprovision or where there are particular needs.

#### **Planning decisions**

B Development proposals which provide high quality health and social care facilities will be supported in areas of identified need, particularly in places easily accessible by public transport, cycling and walking. Where local health services are being changed, the Mayor will expect to see replacement services operational before the facilities they replace are closed, unless there is adequate justification for the change.

C Relevant development proposals should take into account the Mayor's

Best Practice Guidance on Health Issues in Planning.

**LDF preparation**

- D In LDFs boroughs should identify and address significant health and social care issues facing their area for example by utilising findings from Joint Strategic Needs Assessments.
- E Boroughs should ensure their public health team work with the local NHS, social care services and community organisations to:
  - a regularly assess the need for health and social care facilities at the local and sub-regional levels; and
  - b secure sites and buildings for, or to contribute to, future provision.
- F Boroughs should promote the continued role and enhancement of London as a national and international centre of medical excellence and specialised facilities.

- 3.92 This Policy complements Policies 3.16 on social infrastructure and 3.2 on improving health and tackling health inequalities. Boroughs should refer to all three policies when planning for health and social care facilities.
- 3.93 London's health service is vital to maintaining and improving Londoners' quality of life. Its influence goes far beyond the primary role it plays in delivering health care. It is one of the capital's major employers, with over 200,000<sup>107</sup> people working in the NHS in London (including general practice staff but excluding agency workers). London's relatively high housing prices make it hard for frontline staff to afford accommodation in the areas where they work. Policy 3.8 addresses this housing issue.
- 3.94 The NHS in England has undergone a major restructuring. The Health and Social Care Act 2012 transferred responsibility for commissioning of most healthcare services to consortia of GPs, known as clinical commissioning groups (CCGs). A new national body, NHS England, has also been established, with direct responsibility for commissioning non-CCG commissioned services (including primary care, specialist acute services and some public health services). The Act gives boroughs strategic responsibility for promoting joined up local commissioning of health, social care and public health services, through the establishment of statutory health and wellbeing boards (comprising strategic leaders from the local health and care system). Since April 2013, the planning of new health and care provision is determined by the local commissioning priorities set out in Joint Health and Wellbeing Strategies (JHWSs) produced by these new boards. These strategies are in turn informed by Joint Strategic Needs Assessments (JSNAs) of current and future population health and wellbeing needs and demand for services and JHWSs are expected to inform all local commissioning plans, including those of CCGs, and support the integration of

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<sup>107</sup> <http://www.hscic.gov.uk/catalogue/PUB10393>

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health and social care delivery.

- 3.94A In April 2013, the Primary Care Trust and Strategic Health Authority estate transferred to NHS Property Services, Community Health Partnerships and NHS community health and hospital trusts. All organisations are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services and improve the quality of care, and ensure that the estate is managed sustainably and contributes to carbon reduction targets. This will result in surplus sites being released for other purposes. In particular, NHS Property Services will be implementing a disposals strategy which will provide opportunities for new homes on surplus sites.
- 3.95 Demographic trends and national and local policy approaches will partly determine the scale of health and care need in particular locations. New or improved health and social care facilities may be needed as part of large scale commercial and housing developments to address additional demands and should be assessed in accordance with the criteria in paragraph 3.90 and Policy 8.2 on planning obligations. Boroughs may wish to apply the suggested methodology under Policy 3.16 when assessing the needs for healthcare facilities. The needs of older Londoners particularly, in respect of residential and nursing home provision, also need to be considered (see Policy 3.8).
- 3.95A JSNAs (paragraph 3.94) are a potentially valuable source of evidence to inform the development and review of local plans, without the need to commission additional or separate studies. JSNAs describe current and future health and care needs of the local community, and may also contain spatial data. They are produced by local health and wellbeing boards, with borough public health teams usually taking the lead, and updated on a regular basis.
- 3.96 London forms the hub of health-related research and development in the south east of England and is where 25 per cent of UK doctors are trained. It is thus a centre for clinical, training and research excellence. The Mayor's 2020 Vision identifies a growing cluster of academic health science expertise – a 'Med City' that stretches along the Euston Road corridor from Whitechapel to Imperial West at White City. The networks, research and facilities that support London's role as a centre of medical excellence and specialist facilities, and their enhancements, will be supported.
- 3.97 Many policies included within this Plan have a part to play in promoting good health and seeking to address inequalities in health.
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### **POLICY 3.18 EDUCATION FACILITIES**

#### **Strategic**

- A The Mayor will support provision of childcare, primary and secondary school, and further and higher education facilities adequate to meet the demands of a growing and changing population and to enable greater educational choice, including in parts of London with poor educational performance.
- B The Mayor strongly supports the establishment of new schools, including free schools and opportunities to enable local people and communities to do this.

#### **Planning decisions**

- C Development proposals which enhance education and skills provision will be supported, including new build, expansion of existing or change of use to educational purposes. Those which address the current and projected shortage of primary school places and the projected shortage of secondary school places will be particularly encouraged. Proposals which result in the net loss of education facilities should be resisted, unless it can be demonstrated that there is no ongoing or future demand.
- D In particular, proposals for new schools, including free schools should be given positive consideration and should only be refused where there are demonstrable negative local impacts which substantially outweigh the desirability of establishing a new school and which cannot be addressed through the appropriate use of planning conditions or obligations.
- E Development proposals which maximise the extended or multiple use of educational facilities for community or recreational use should be encouraged.
- F Development proposals that encourage co-location of services between schools and colleges and other provision should be encouraged in order to maximise land use, reduce costs and develop the extended school or college's offer. On-site or off-site sharing of services between schools and colleges should be supported.
- G Development proposals that co-locate schools with housing should be encouraged in order to maximise land use and reduce costs.

#### **LDF preparation**

- H LDFs and related borough strategies should provide the framework:
  - a for the regular assessment of the need for childcare, school, higher and further education institutions and community learning facilities



at the local and sub-regional levels; and

- b to secure sites for future provision recognising local needs and the particular requirements of the education sector.

I Boroughs should support and maintain London's international reputation as a centre of excellence in higher education.

- 3.98 A growing city with an increasing number of young people will need more educational facilities at all levels. At the same time, policy favours greater choice of school provision, including in parts of London with problems of poor educational performance. Planning policies supporting the allocation of sufficient space for education and facilitating development of schools and colleges in appropriate places will be essential to London's continued economic success, tackling exclusion and disadvantage and improving quality of life. The Mayor's approach to schools development reflects the joint policy statement of the Secretary of State for Communities and Local Government and the Secretary of State for Education on Planning for Schools Development of August 2011.
- 3.99 This Policy complements Policy 3.16 on social infrastructure. Boroughs should refer to both policies when planning for education facilities.

#### *Childcare provision*

- 3.100 Access to adequate, affordable and high quality childcare (pre-school and school age) provision plays a key role in children's development and enables parents to go back to work. To address the shortage of childcare facilities in London, boroughs should make regular assessments of provision for childcare and draw up proposals to address any shortfalls. Boroughs should ensure that the location and provision of a range of services at children's centres continue to meet the needs of local communities in consultation with parents, the private, voluntary and independent sectors, primary care trusts, Jobcentre Plus and other key partners.
- 3.101 Childcare facilities should be safe, accessible for all (including disabled children), multi-functional and provide both indoor and outdoor learning opportunities. Proposals for housing and commercial facilities should provide suitable childcare for those in need of it, in particular in disadvantaged areas.

#### *Primary and secondary schools*

- 3.102 Access to a high quality school education is a fundamental determinant of the future opportunities and life chances of London's children and young people. London's population will continue to be younger than elsewhere in England and Wales and by 2036, its school age population is projected to increase by 18 per cent. The Mayor's 2020 vision identifies a need for 4,000 extra primary classes by 2020. As a response to the recommendations of the Mayor's Education

Inquiry<sup>108</sup>, the GLA Intelligence Unit has produced the London Schools Atlas<sup>109</sup>, an interactive map 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.

- 3.102A At the same time, national education policy favours greater diversity in the nature of supply, through the Academies Act 2010 and the setting up of the Free Schools, alongside greater devolution of responsibilities from local authorities to schools. Local authorities' strategic role in the new system will be to take a proactive, positive and collaborative approach to development that will widen choice in education, promoting a good supply of strong schools and encouraging the development of Academies and Free Schools. Local authorities will still be required to fulfil their statutory duty to secure sufficient school places within their areas.<sup>110</sup>
- 3.103 Land already in educational use should be safeguarded and new sites secured to meet additional demands or changes in provision. The NPPF (para 72) states that local planning authorities should give great weight to the need to create, expand or alter schools and work with school promoters to identify and resolve key planning issues at an early stage<sup>111</sup>. Boroughs should identify at an early stage the need for additional schools arising from development and regeneration, particularly where there are existing shortages. Development can be a catalyst for positive change. The identification of suitable sites should be carried out taking into account policies in this Plan, and in particular accessibility by public transport as well as by cycle and by foot.
- 3.104 School facilities can provide venues for a range of community activities, including children's centres, and cultural and sports activities, where children and parents feel comfortable to access them. School facilities such as sports, training and meeting facilities should be capable of use by the wider community outside school hours. Maximum use of schools in the evenings and at weekends will reduce the land requirement for other uses.
- 3.105 Partnership working with other schools and with wider children's services should be developed in order to offer more to children than any one partner could alone. Schools should look to make arrangements to use local off-site provision when these are not fully used during school day.
- 3.106 In order to support educational attainment and adapt to changing work and lifestyle patterns, the needs for facilities for children with special needs and additional pre or after school activities need to be considered. The Mayor

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108 Mayor of London. The Mayor's Education Inquiry, Final Report: Findings and Recommendations. GLA, October 2012

109 <http://www.london.gov.uk/priorities/young-people/education-and-training/london-schools-atlas>

110 Education Act 1944

111 CLG. 2012 op cit. NPPF paragraph 72

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supports the role of uniformed and non-uniformed youth organisations delivering positive activities that improve the life chances of London's children and young people.

### *Higher and further education*

- 3.107 Higher education in London provides an unparalleled choice of undergraduate and postgraduate degrees, continuing professional development, advanced research, and infrastructure to support business growth, e.g., incubation space and business support services. It is also a major employer and attracts major international companies able to benefit from the universities' research reputation, 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 (Policy 4.12). The Mayor has established a forum for higher education institutions (HEIs) and further education establishments to work with boroughs and other stakeholders to plan future developments, including student accommodation (Policy 3.8) in locations with good public transport access, taking account of their sub-regional and wider spheres of operation and capacity to contribute to the wider objectives of this Plan.
- 3.108 Access to further education (FE) is important for both the large proportion of Londoners who do not go into higher education and, in some places, for sixth form provision. FE colleges provide a key role in skills development and life-long learning and will assist with Londoners' employment (Policy 4.12). They also provide valuable community facilities and services, and the Mayor will support the protection and enhancement of FE colleges and facilities.

## **POLICY 3.19 SPORTS FACILITIES**

### **Strategic**

- A The Mayor's Sports Legacy Plan<sup>1</sup> aims to increase participation in, and tackle inequality of access to, sport and physical activity in London particularly amongst groups/areas with low levels of participation.

### **Planning decisions**

- B Development proposals that increase or enhance the provision of sports and recreation facilities will be supported. Proposals that result in a net loss of sports and recreation facilities, including playing fields should be resisted. Temporary facilities may provide the means of mitigating any loss as part of proposals for permanent re-provision. Wherever possible, multi-use public facilities for sport and recreational activity should be encouraged. The provision of sports lighting should be supported in areas where there is an identified need for sports facilities to increase sports participation opportunities, unless the

<sup>1</sup> Mayor of London. A Sporting Future for London. GLA, April 2009

sports lighting gives rise to demonstrable harm to local community or biodiversity.

- C Where sports facility developments are proposed on existing open space, they will need to be considered carefully in light of policies on Green Belt and protecting open space (Chapter 7) as well as the borough's own assessment of needs and opportunities for both sports facilities and for green multifunctional open space.

#### **LDF preparation**

- D Within LDFs Boroughs should assess the need for sports and recreation facilities in line with the NPPF (paras.73-74) at the local and sub-regional levels regularly, and secure sites for a range of sports facilities.

- 3.109 This Policy complements Policy 3.16 on social infrastructure. Boroughs should refer to both policies when planning for sports facilities.
- 3.110 Sports and recreation facilities are important parts of the social infrastructure, providing a range of social and health benefits for communities and neighbourhoods. Backed by the Mayor's Sports Legacy Plan, these will be given increasing prominence as part of the legacy of the 2012 Olympic and Paralympic Games.
- 3.111 Within the next 10 years, London will be short of indoor community facilities such as sports halls and artificial grass pitches. Demand and supply for swimming pools will be broadly in balance Londonwide, although some areas will be better supplied than others. It is essential that local authorities plan strategically for the future provision of these core sports facilities, and the GLA has prepared a technical report<sup>112</sup> with Sport England which assists boroughs. The report advances the Mayor's commitment in *A Sporting Future for London* to initiate a facility strategy for the capital and his encouragement to all authorities that have yet to undertake a needs and evidence based approach to planning for community sport to do so. In the current climate, refurbishment or modernisation of existing sports facilities as well as rationalisation and replacement of existing sports provision is critical to ensuring that the right mix of facilities are in the right places to meet sporting demand and to increase levels of participation.
- 3.111A When not being used for their primary function, large sports facilities providing for spectator sports should be opened up and encouraged to host a wide range of other community activities. Built sports facilities should only be accommodated on green open space, if that area has been identified by a borough open space strategy as surplus to requirements for any open green space use.
- 3.112 The Mayor will work with local authorities, national sports governing bodies, Sport

<sup>112</sup>An evidence base for sports facilities in London – the basis for strategic sports facilities planning across London using Sport England's Facility Planning Model. David Payne, August 2010. <http://www.london.gov.uk/priorities/planning/publications/strategic-planning-for-sports-facilities-in-london>

England, sporting foundations and trusts, the private sector and others to provide investment to support the development of new facilities or the refurbishment of existing facilities. The focus will principally be small, community, park or estate-based projects. The Mayor will also support the establishment of multi-sport hub sites on playing fields in London. Shared use of sports facilities in schools (state and independent), further and higher education institutions, commercial schemes, community centres and church halls will help reduce demand for new provision.

- 3.112A Up-to-date playing pitch strategies provide a robust evidence base to inform consideration of school expansion. Playing field related issues should be discussed with Sport England and playing pitch strategies should take account of Sport England's new methodology<sup>113</sup>. Sport England can provide support and guidance to local authorities seeking to refresh or develop new playing pitch strategies.
- 3.113 As part of renewing a school's building stock, there may be opportunities to identify complementary specialised sports facilities that can be shared by schools, the community and sports clubs. Through attracting specialist clubs and coaches, this can assist in raising standards of performance and widen opportunities for students and community users. If such a facility fills an identified gap in provision, funding may be available through a sport's national governing body or other partners. Sports facilities should be accessible to all sections of the community (including disabled people), within easy reach by walking, cycling and public transport, affordable and safe. Installation of sports lighting can enable the full use of artificial grass pitches and other outdoor sports provision, but consideration must be given to any demonstrable harm to residential communities or biodiversity. Where appropriate, disused bathing ponds and lidos should be brought back into use.
- 3.114 The 2012 Paralympic Games helped to change attitudes towards disabled people<sup>114</sup> and provided the opportunity to improve disabled people's participation in sport and physical activity. To build on this legacy all development proposals should ensure that inclusive access issues are addressed from the outset (see Policy 7.2) so that programmes such as the Inclusive Fitness Initiative<sup>115</sup> and the Mayor's Sports Legacy programme can be effective in increasing disabled and older people's ability to participate. The Olympic Delivery Authority's approach to embedding inclusive design from the outset<sup>116</sup> was effective at integrating inclusive design principles in the development process, helping to deliver the most accessible games ever.<sup>117</sup> This inclusive design process is being taken forward by the London Legacy Development Corporation in their Inclusive Design Strategy

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113 Sport England. Playing Pitches Strategy Guidance: An approach to developing and delivering a playing pitch strategy. October 2013

114 <http://www.bbc.co.uk/news/uk-20693024>

115 [http://www.efds.co.uk/inclusive\\_fitness](http://www.efds.co.uk/inclusive_fitness)

116 Olympic Delivery Authority (ODA). Inclusive Design Strategy and Standards. ODA, September 2008

117 see Mayor's press release <http://www.london.gov.uk/media/mayor-press-releases/2012/08/2012-games-raising-bar-for-embedding-accessibility-into-sporting>

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and Standards,<sup>118</sup> and can be used as a model of good practice to be followed in all developments outside the Queen Elizabeth Olympic Park. Sport England has published updated guidance on Accessible Sports Facilities, an audit checklist and downloadable CAD drawings of accessible sports facilities<sup>119</sup> to ensure that new sports facilities meet inclusive design principles.

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118 London Legacy Development Corporation. Inclusive Design Strategy, September 2012. London Legacy Development Corporation, Inclusive Design Standards, March 2013

119 Sport England. Accessible Sports Facilities. Sport England, 2011

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