Homes for all Londoners – GLA SPG

Extracts from October 2020 consultation documents.

Introduction

The purpose of this London Plan **Supplementary Planning Guidance** is to help interpret and implement the **'Publication' London Plan** (London Plan) policies on housing design, optimising site capacity on all scales of site and enabling housing supply through smaller housing developments, with the wider purpose of supporting Good Growth. The document sets out a design-led approach to intensification, using residential types to quickly identify the indicative capacity of a site or area, with careful consideration of housing design standards that protect quality of life for residents.

The document provides guidance on assessing the capacity of land and buildings to accommodate housing by optimising site capacity at all stages of the planning process (plan-making, site allocation, area-based strategies, pre- application discussions and application determination). The National Planning Policy Framework (**NPPF 2019**) encourages the use of ways of proactively granting permission for new housing. This document provides guidance to boroughs and neighbourhood forums for bringing forward high-quality homes by way of **Local Development Orders** and **Permission in Principle** (PiP).

The Government and the Mayor recognise that small housing development should play a greater role in the provision of additional homes. This guidance provides advice on how opportunities to deliver new homes on small housing developments should be identified, shaped and permitted to meet London's housing needs and deliver contextually appropriate, better quality design (London Plan Policy H2: Small sites).

The SPG applies to the implementation of the London Plan policies in Chapter 3 • D1 London's form, character and capacity for growth; • D2 Infrastructure requirements for sustainable densities; • D3 Optimising site capacity through the design-led approach; • D4 Delivering good design; • D5 Inclusive design; • D6 Housing quality and standards; • D7 Accessible housing and in Chapter 4 • H1 Increasing housing supply; • H2 Small sites.

Structure

This London Plan Guidance is constructed as a series of modules.

Foreword: Good Quality Homes for All Londoners

The foreword communicates the Mayor's vision for high-quality housing, particularly housing delivering improved quality of life through design-led processes of site optimisation. This narrative puts the purpose and content of the Housing Design London Plan Guidance within the wider context of the Greater London Authority's mission to ensure Good Growth and provide good quality housing for all Londoners.

Councils first analyse the character and context of all areas of their borough, then assess the capacity of land and buildings to accommodate housing by optimising site capacity at all stages of the planning process (plan-making, site allocation, area-based strategies, pre-application discussions and application determination).

Councils will work out what quantities of homes and of what type are appropriate to each site. The quality of life for future and current residents is considered at the earliest stages of the site planning process in determining what the appropriate built form and scale is for optimising the development of any site.

The Foreword states "There's no place for meagre space provision such as in the recent spate of office-to-housing conversions allowed under the Government's Permitted Development Rights legislation." and

“Boroughs are expected to establish optimum site capacities for site allocations through a consultative, proactive, design-led approach that allows for meaningful collaboration with communities, organisations and businesses. Community engagement by boroughs is an important dimension of ensuring the design-led approach to optimising site capacity.”

Module A: Optimising Site Capacity - A Design-led Approach

Module A provides guidance on the residential type suitable for a site, in order to determine potential capacity. It advocates a design led methodology for optimising site capacity at the plan making stage by encouraging boroughs to prepare area-wide design codes to open up opportunities for small-scale housing developments in areas already well-served by public transport and existing infrastructure.

It is aimed at borough policy officers when calculating capacity on strategic and non-strategic site allocations. It sets out an approach to assessing sites’ suitability for development and offers a tool for assessing site capacity with well-considered design that is appropriate to its context.

The guidance is intended also to provide local communities with confidence that the Mayor is determined to work with development partners to deliver growth that safeguards amenity and helps ensure that all Londoners have a good quality of life.

Boroughs should commit to sincere community engagement - carried out in accordance with up to date Statements of Community Involvement - that connects with the views of their local communities. Feedback gained should then be used to shape the policy framework throughout its various stages of development.

Identifying the optimum site capacity for a given site during plan-making occurs within a sequence of proactive planning. This begins with characterisation as part of borough-wide area assessments required by London Plan Policy D1 for London’s form, character and capacity for growth. It should evaluate how the socio-economic and cultural, physical and environmental, and experiential and perception factors have shaped the places within and across boroughs.

Optimum site capacity is defined as development with the most appropriate form for its site, following an evaluation of the site’s attributes, its surrounding context and its capacity for growth (London Plan Policies D1, D2, and D3). When optimising site capacity, boroughs are encouraged to consider levels of future provision of infrastructure, in addition to existing infrastructure.

The SPG explains in Module A the GLA tools for Public Transport Accessibility Level (PTAL) which provides a consistent measure across London of the public transport network, reflecting aspects such as walking access time, service frequency and the range of destinations served and Time Mapping Analysis (TIM) which provides a measure of access to employment and services through the public transport network. They are contained in ‘**WebCAT**’ which is a web-based Connectivity Assessment Toolkit.

The information gathered should be complemented by an assessment of connectivity on foot to local town centres and other amenities as well as the quality and extent of local walking and cycling conditions and infrastructure.

There is also a **Population Yield Calculator** for boroughs to use which is a tool for estimating population yield from new housing development to consider the demand on local facilities.

Capacity testing is intended to be undertaken digitally using simple CAD software such as SketchUp or other CAD software. The Optimising Site Capacity Digital Toolkit is provided as a downloadable digital resource from the GLA’s website.

Large-scale development contingent upon transport infrastructure improvements will need to either be phased in line with known planned PTAL changes or contribute to improvements where there are none

planned. Where development depends upon new planned social infrastructure, boroughs should consider how phased development could help optimise capacity over time.

For large sites where delivery will be phased, applicants should outline a delivery schedule with their planning applications detailing the provision of affordable housing, publicly accessible open spaces, enhancement of accessibility measures and provision of social infrastructure.

Area assessments are to identify the areas that are appropriate for extensive, moderate or limited growth to accommodate borough-wide growth requirements as the foundation of Local Development Plan preparation and area-based strategies.

[*NOTE: The types of area and sites identified by the guidance in this SPG names are ones for 'transformation', 'enhancement' and 'conservation'. When that assessment work is done by boroughs, it would be a good basis for identifying Growth, Renewal and Protection areas and sites, if the Planning Bill introduces those as proposed in the '**Planning for the Future**' White Paper.]*

The cumulative demands on infrastructure of minor development should be addressed in boroughs' Local Plans, IDPs and Programmes (and funded, for example, by planning obligations).

Where change is proposed, boroughs should be able to define clearly elements of significant value that contribute to the place's distinctive character and those elements that do not (London Plan Policy D3.B.11).

Module A of the SPG provides a range of residential types to test site capacity whilst responding to the existing qualities of the surrounding area.

The most common existing and emerging housing types are categorised based on their typical characteristics, access and circulation arrangements and their ability to meet Module C's housing design quality standards. Each type is described in terms of its inherent qualities, characteristics, flexibility to accommodate different tenure and type mixes and suitability for integration with mixed uses.

Types of housing particularly suitable for smaller housing developments include residential conversions and extensions (Type A), individual houses (Type B), and clusters of houses or stacked maisonettes that are capable of forming a coherent design response on a single site (Type C). These types are introduced within Module A, but they are best understood in relation to their role in the preparation of place-specific design codes (Module B).

Residential types intended to optimise larger sites include terraces (Type D); linear blocks (Type E); villa blocks (Type F); and towers (Type G). These are discussed in detail within Module B, and are accompanied by an outline of their anticipated performance against the Housing Design - Quality and Standards as a means of promoting quality of life (Module C). Single-aspect dwellings should be avoided.

If a site is large enough to incorporate more than one house, then a cluster of houses or other types enabling optimum site capacity should be explored.

Taller buildings do not always result in more affordable homes, as additional height can increase development costs which may not be covered by increased revenue. This can be more evident in lower value locations and can result in reduced affordable housing as a proportion of total delivery. On such sites, alternative lower rise build types may be more appropriate.

Increasing building height is likely to increase the potential for overshadowing neighbouring buildings, streets and open space, and building distances should be considered accordingly to preserve quality of life.

This design-led method draws on the understanding developed during site and context analysis (Stage One) and consideration of residential types, urban arrangements and mixed-use developments (Stage Two). It is important to balance growth with the protection of existing amenity.

Module B: Small Housing Developments - Assessing Quality and Preparing Design Codes

Providing guidance on both assessing the quality of small sites schemes and preparing design codes, Module B will help boroughs to optimise development opportunities on sites below 0.25 of a hectare and deliver on their small sites housing targets set out in London Plan Policy H2 (Small sites). To do this, the module explores the typical conditions found across London which might be suitable for small site development and offers examples of how a borough could write design codes linked to the 'Housing Design – Quality and Standards' identified in Module C, offering template design codes.

Design codes describe the key design principles for a development proposal in a simple, concise and mainly graphic format. By defining the approach to layout, massing and height, the code defines the principal features that make up the overall design integrity of the scheme.

Boroughs will have to produce several design codes to address multiple and differing character areas.

Good growth is best served by setting clear design requirements that aren't overly prescriptive or unnecessarily frustrating for development, and that take account of affordability and wellbeing. This is especially important when delivering new homes within existing neighbourhoods.

To create certainty and stimulate high quality, residential development, design codes should be proportionate, context specific and support the realisation of London-wide and borough-wide planning policy and design governance. Undertaking effective design coding that interprets the character of existing neighbourhoods and establishes place-specific design principles requires time, design capacity and expertise.

Good growth across London requires high quality residential development at all scales of delivery. Londoners living in existing communities deserve to experience the benefits of growth and change irrespective of its scale. Community support for intensification of existing neighbourhoods through conversion, extension, additional development on underused land, and demolition and redevelopment on brownfield land, will be achieved at scale only if boroughs enable character-specific, good quality design and construction.

Where borough planning policy and design guidance is clear and up to date, development can realise the incremental growth needed within existing neighbourhoods, whilst offering developers and communities increased sight of and certainty about planning outcomes.

Module B illustrates various housing types for street facing sites and backland locations and provides example design codes.

Case studies of successful small sites development are included in Module D and can be referenced when writing codes as best practice examples.

Module C: Housing Design - Quality and Standards

Module C updates the London Housing Design Guide (2010). It is aimed at borough development management officers and developers and their design teams seeking planning permission. The guidance is categorised under the broad themes of

Shaping Good Places, Designing for a Diverse City, From Street to Front Door, Dwelling Space Standards, Home as a Place of Retreat, Living Sustainably and Future Proofing.

In addition to providing technical standards where applicable, Module C provides qualitative guidance, with reference to best practice examples (in **Module D: Housing Design- Case Studies** and Appendices), to demonstrate where good design has been critical to a positive resident experience.

Appendices to 'Homes for All Londoners'

Appendix 9.1. - Design-led planning process for optimising site capacity

A design-led approach should be adopted throughout the planning process, from development plan formation to pre-application discussion, determination and delivery of planning applications. This requires proactively establishing the development capacity of sites during plan formation and optimising density during development management processes. This is critical to ensuring housing targets are achieved on available land while promoting better residential design, since planned capacity and density are directly connected to realising developments of appropriate scale and form.

This design-led approach requires boroughs to undertake site and area- specific capacity testing at plan-making and guidance stages. This sets a robust benchmark against which proposals can be assessed. Frontloading capacity testing is consistent with a plan-led approach. This should reduce planning risk and increase certainty of housing development outcomes for local planning authorities, elected members, decision-makers and communities, as well as prospective developers and their consultant teams. It is anticipated that early investment in capacity testing and optimisation will contribute to a more predictable, less resource intensive development management process.

Plan-making

Boroughs have significant opportunities to consider how best to achieve appropriate densities to accommodate growth during the plan-making process, as part of strategic policies that set out the pattern, scale and quality of development. Boroughs should be satisfied that site allocation through neighbourhood plans and area-based strategies (e.g. Opportunity Areas) seek to test and optimise a site's development capacity to accommode appropriate levels of housing-led growth.

The preparation of development briefs or planning briefs provides boroughs with an opportunity to apply policy and guidance to test the development potential of specific sites. This informs appropriate site allocation and encourages positive development by reducing planning risk. Briefs should be succinct, clear and provide a level of detail proportionate to the most important site-specific issues to be addressed, rather than broadly repeating planning policy and guidance. Design codes for a site or area offer boroughs a means of establishing and assessing the design quality of a proposal during plan-making and development management. This is done in relation to site-specific constraints and opportunities, including how proposals manage proposed densities in relation to intended types of housing, existing and new infrastructure capacities, and the potential for enhancing the character of surrounding neighbourhoods.

Planning briefs, development briefs, and site or area design codes provide progressively detailed design content that aims to articulate and test the vision for a specific site or area using purposeful illustrations, often in relation to a masterplan. Two-dimensional and three-dimensional graphic information can be integrated within written accounts to describe site-specific considerations impacting on the design process and articulate the quality of design outcomes. These offer boroughs an invaluable opportunity to discuss and evaluate the appropriateness of proposals. Design codes present boroughs with opportunities to establish design parameters to improve design governance, when included within planning permissions. The creation of design codes to secure design quality for incremental residential intensification is particularly endorsed for small sites (Module B).

Decision-making during the planning process

Boroughs should proactively work with applicants through development management processes to secure high-quality developments that optimise site capacity.

Pre-application discussions

Early pre-application discussion offers boroughs the greatest opportunity to support applicants to develop site-specific, context-appropriate responses to optimising site capacity. A site's capacity and resultant density should be determined in relation to local issues, e.g. infrastructure capacity. Boroughs should consult with

infrastructure providers to establish the infrastructure capacity of the development site and wider area. Where proposals suggest a capacity in excess of that which could be supported by current or future planned infrastructure, emerging proposals for a site should be supported by a site-specific infrastructure assessment. This assessment should establish what additional impact the proposed development could have on current and planned infrastructure, and how this impact may be appropriately mitigated on site or through an off-site mechanism, e.g. funded through Community Infrastructure Levy (CIL) generation.

Design governance during the design process

Boroughs should establish a robust approach to design governance to scrutinise, agree and maintain residential design quality of planning applications (London Plan Policy D4). Pre-application discussions related to optimising site capacity will be enriched by evidence generated through design review and design and access statements (London Plan Policy D4:C-E).

The independent scrutiny and expertise provided by design review is likely to be particularly valuable when assessing housing quality in relation to existing contexts where the housing density proposed by applicants is above 350 units per hectare, or where a tall building is proposed.

Determining planning applications

Planning applications should describe the density of proposed developments, including new residential units using recognised units of measurement (refer to 3.2 Measuring optimum density). Boroughs should use pre-application discussions, design governance processes (e.g. design review) and supplementary documents to evaluate how applicants propose to optimise site capacity with reference to capacity factors, housing design standards, and processes and policies associated with plan-making and site allocation (e.g. strategic policies, area-based strategies, development briefs and design codes).

A design and access statement should provide an accessible means of evaluating whether proposals achieve or exceed anticipated site capacity (London Plan Policy D4:C). Applicants should offer a clear explanation of how site capacity has been optimised during the design process. They should demonstrate how their design-led approach has sought to balance potentially conflicting planning objectives with detailed reference to existing site context and the quality of the proposed development.

Evaluating site capacity within proposals

Where a proposed development is acceptable in terms of use and design, but exceeds the site capacity identified in a local site allocation - or the site is not allocated - and the existing infrastructure capacity will be exceeded, additional infrastructure proportionate to the development should be delivered through the development (London Plan Policy D2:C). Additional infrastructure requirements should be identified through an infrastructure assessment

during the planning application process. This should have regard to the local infrastructure delivery plan or programme, and the Community Infrastructure Levy/Section106 contribution that the development will make. If the necessary infrastructure needed to support a proposed development cannot be delivered, the scale of development should be reduced accordingly or an alternative development should be explored.

Development proposals are expected to accord with the site capacity establish by a borough through a design-led approach in its site allocations. Proposals that exceed the development parameters set out in a site allocation can be refused for this reason in accordance with London Plan Policy D3:C.

Boroughs should carefully consider the use of planning conditions and obligations to secure design quality as approved, and monitor development to ensure quality is delivered, through enforcement if necessary. Boroughs should ensure that the overall design quality is maintained when determining applications for either material or non-material amendments to approved schemes. This includes, where appropriate, enforcing design guidance and design codes proposed during outline permissions; management plans; the use of specific external materials; and the use of specific designers to execute detailed design development unless otherwise approved.

Deciding applications for small housing developments

Where a borough has adopted a design code in accordance with Module B, applications for small housing developments in the area covered by a design code should comply with it. Where a borough has not adopted a design code for an area that is the subject of a planning application for a small housing development, Module B offers requirements against which to appraise a scheme.

Development management

Most planning consents for developing small sites are expected to be approved through the standard planning application route. Boroughs should use the full range of planning tools available, including brownfield registers, permission in principle and Local Development Orders where appropriate and support community organisations in bringing forward Neighbourhood Development Orders and Community Right to Build Orders. These alternative ways of granting permission are effectively a hybrid of a local plan allocation and planning permission and determine actual development capacity of the site. Boroughs should increase planning certainty for small sites and small housing developments by listing these sites on their brownfield registers, granting permission in principle on specific sites or preparing local development orders.

Permission in principle

This alternative way of obtaining permission was made possible by the Town and Country Planning (Permission in Principle) Order 2017, which came into force in June 2018. The Permission in Principle (PiP) consent route has two stages. The first is the permission in principle stage. This establishes whether a site is suitable in principle. The second is the technical details consent stage. This takes place when the detailed development proposals are assessed.

A borough can grant permission in principle to a site in response to an application, or by entering a site in Part 2 of its brownfield land register. This will trigger a grant of permission in principle for that land, but only for minor development of between one and nine homes. A borough will only list a site in Part 2 of the register if it decides to allocate it for residential development, having followed a series of required procedures.

The scope of PiP is limited to location, land use and amount of development. Issues relevant to these in-principle matters should be considered at the permission in principle stage. Other matters should be considered at the technical details consent stage. It is not possible for conditions to be attached to a grant of PiP. However, boroughs can inform applicants about what they expect to see at the technical details consent stage. The use of design codes helps identify the likely capacity of a site and establishes key parameters to inform subsequent applications for technical details consent (Module B).

Local development orders and community right to build orders

Local Development Orders (LDOs) can be used to promote small housing developments, to varying levels of success. The Mayor has powers under the Infrastructure Act 2015 to make a Mayoral Development Order that grants planning permission for specified development, providing, amongst other things, that it is in response to an application by a borough or boroughs where the site is located.

Planning Advisory Service (PAS) has prepared useful guidance on the preparation of LDOs and the use of LDOs to promote small housing developments. As with PiPs, boroughs are encouraged to use design codes to help identify the likely capacity of a site and to establish key parameters for housing that is consented by an LDO.

Monitoring and evaluation

Boroughs should review the conclusions from capacity testing as schemes progress. They should do this firstly by comparing estimated capacity at the plan-making stage with the determined capacity at the development management stage. Secondly, they should make time to review the quality of completed schemes by visiting a sample of completed developments and asking residents what they think about living in their new home. Such monitoring will enable lessons to be learnt and policies and guidance to be adjusted where necessary.

Appendix 9.2. Measuring optimum density

Good growth requires residential developments to achieve optimum densities, rather than simply maximising densities. Using several measures to assess, monitor and compare the density and site capacity of development proposals provides a more balanced perspective on the implications of development for the character of an area, as well as on the experience of residents and infrastructure requirements. Likewise, using multiple measures of density reduces the potential for misleading claims about density. Boroughs should compare density during plan-making and decision-making about applications, including new residential units, by using the following recognised measures of density (3.1B.23):

1. Number of dwellings per hectare
2. Number of habitable rooms per hectare
3. Number of bedrooms per hectare
4. Number of bedspaces per hectare.

The number of bedspaces per hectare is likely to provide the best estimate of residential population and give an insight into infrastructure provision. The number of units per hectare and number of habitable units per hectare provide an insight into the appropriateness of a proposal as a measure of built form and massing. Boroughs should consider the maximum height and scale of major components of proposed developments when undertaking modelling of site capacity during plan-making.

This should anticipate the additional measurements required for all major planning applications by applicants:

- Floor area ratio (total Gross External Area of all floors/site area)
- Site coverage ratio (Gross External Area of ground floors /site area)
- Maximum height in metres above ground level of each building and at Above Ordnance Datum

Optimum density – 'Publication' London Plan Policy H2 for Small Sites - means efficient use of land considering integration of form and scale of buildings, the location of different land uses, and the potential for pedestrian connectivity to services as assessed and monitored using several measures of density. This demonstrates an appropriate development response relative to site capacity.

Housing Design Standards – assessment categories

Shaping Good Places • Response to character and context • Sense of community • Topography Land use mix • Open space **From Street to Front Door** • Access and servicing • Safety and security • Cycle parking • Car parking **Dwelling Space Standards** • Private internal space • Private outside space • Spatial quality **Future Proofing** • Flexibility and adaptability • Safeguarding development potential • Quality, maintenance and management	**Designing for a Diverse City** • Diversity of residential type and tenure • Accessible housing and inclusion • Sense of community **Home as a Place of Retreat** • Privacy Aspect and outlook • Daylight, sunlight and overshadowing • Indoor air quality and noise • Thermal comfort **Living Sustainably** • Environmental sustainability • Biodiversity and urban greening • Flood mitigation and sustainable drainage systems • Air pollutant emissions

All housing developments should meet minimum floor space standards set out in Table 3.1 of the London Plan.