

Appendix 1: Housing Supplementary Planning Guidance – Summary of Content

1. PART 1 – Housing Supply

1.2 This chapter is largely based on the Interim housing SPG which was consulted on in October 2009 and published in April 2010.

Housing targets

1.3 The Mayor intends to develop a more effective methodology to revise the housing targets set in the London Plan and is working with boroughs and other stakeholders to develop a methodology which will respect London's distinct needs and circumstances. This will be used to produce new targets, which will be better placed to enable London to tackle its housing needs through a future alteration to the London Plan. The London Plan housing targets are to be revised no later than 2015/16.

Sources of Housing Supply

1.4 To assist boroughs in identifying sites to meet their housing targets the SPG identifies a range of potential sources of housing supply in London. The SPG highlights broad areas of housing potential including London's Opportunity Areas and parts of east and central London in particular the Thames Gateway Growth Area. The SPG also identifies smaller sites that may contribute towards housing supply including conversions, private garden land development, small infill developments, flats above shops, airspace developments and live/work units.

1.5 The SPG states that a balance has to be struck between realising the potential of residential conversions, especially to meet the needs of smaller households, and sustaining the residential quality of those neighbourhoods where pressure for conversion is particularly intense.

1.6 The SPG recognises the importance of private gardens. Account should be taken of their value for biodiversity, protection of trees, abating flood risk, addressing the effects of climate change and their contribution to communities' sense of place and quality of life especially in outer London where they are a key component of its distinct attractions. These wider objectives are generally likely to outweigh those flowing from the small increment to overall housing provision which usually results from garden development.

1.7 With regards to infill development particular account should be taken of the potential for site assembly and comprehensive or coordinated development, present and potential accessibility, potential plot depths, overlooking/day lighting, and the ability to complement local context.

Density (Optimising Housing Potential)

- 1.8 The SPG highlights the London Plan approach to optimising rather than purely maximising the housing potential of sites. When coming to a decision on density, appropriate weight should be given to the range of relevant qualitative concerns so an informed judgement can be made. Relevant considerations include local context, good design, public transport capacity, social infrastructure, open space and play provision. The maximum of the density range should not be taken as a 'given' or even a minimum expectation. The number units in a residential development should be balanced against the quality and mix of housing types, whilst respecting local context.
- 1.9 The SPG recognises that Different forms of development can have similar densities and high density does not have to mean higher rise development.
- 1.10 Making decisions on housing density requires striking a sensitive balance between a complex range of factors as set out above. Thus, the SPG recognises that interpretation of the broad density policy outlined in the London Plan and expressed in Development Plan Documents (DPDs) is very properly a local matter.
- 1.11 Density decisions on new schemes should take account of the different housing needs of the households who will live in the completed scheme. In broad terms, higher densities (which assume a lower number of habitable rooms per dwelling) will be more suitable for households without children and will require less open space and play provision. Higher density housing can be particularly suitable for town centres and as an element of mixed-use developments, where open space and car parking may be limited.
- 1.12 Lower density developments lend themselves more, though not exclusively, to family housing. This generally makes them more appropriate for higher proportions of social rented affordable housing, given the particular need for family social housing provision.
- 1.13 Effective implementation of affordable housing policy can be compromised by development of particularly large dwellings (measured in square metres rather than habitable room/hectare). In such cases, it may be more appropriate to estimate affordable housing provision on the basis of floorspace rather than numbers of units.

2. PART 2 – Quality

- 2.1 The Mayor seeks to improve quality and design standards making sure that homes meet the needs of a changing population throughout their lives and are built to the highest environmental standards.
- 2.2 The SPG sets out design standards which apply to all new housing with the exception of student housing, sheltered housing and homes in multiple occupation. This includes 57 baseline standards which together set the baseline for quality and design that new homes should meet. Developments

which depart significantly from these standards are unlikely to be acceptable.

- 2.3 The SPG also contains 13 good practice standards which if adopted are likely to lead to exemplary housing quality and design. Departure from individual good practice standards is unlikely to justify refusal of planning permission.
- 2.4 For larger developments, and especially in planning frameworks for development proposals that are over five hectares or capable of accommodating more than 500 dwellings the standards should be explicit considerations that are clearly outlined in a planning framework.
- 2.5 The standards cover a range of design topics including consideration of the physical context and character of the area, open space, density, safety, accessibility access to services and infrastructure. The standards are taken from the Interim London Housing Design Guide 2010 which applied only to housing built on London Development Agency land and housing schemes applying for funding from the London Homes and Communities Agency. The draft housing SPG now applies the standards to all housing across London. Application of the standards should clearly be demonstrated in the design and access statement.
- 2.6 Most of the Plan's housing standards are in fact already London Plan policy requirements or devolve from other relevant guidance and the SPG is intended to bring them together in an easy to use format and as a coherent expression of planning policy.
- 2.7 With regards to the minimum space standards in the London Plan the SPG advises that these should not cause a significant impact on build costs, the only exception may be for very small schemes (of less than 10 units) that have significant site constraints. In which case it may be justifiable to make a judgment about compliance with the space standards against wider policy issues, such as housing delivery and viability.
- 2.8 Annex 2.2 to part 2 of the SPG sets out best practice Guidance for Wheelchair Accessible Housing.
- 2.9 Annex 2.4 relates to Car Parking Standards. London Plan policy on parking for residential developments specifies only maximum parking provision for dwellings of different sizes, it does not relate this to public transport accessibility levels (PTALs). Annex 2.2. sets out two options being tested by the Outer London Commission to develop such an indicative matrix and welcomes comments through the consultation of this SPG.

3. PART 3 - Housing Choice

- 3.1 The Mayor seeks to deliver a real choice of homes for Londoners. Central to this is developing a range of tenures, including different types of

affordable housing. This section of the SPG provides guidance on the overall approach to estimating needs of different sorts.

Strategic Housing Market Assessment

- 3.2 The 2008 Strategic Housing Market Assessment (SHMA) provides a key part of the evidence base for the London Plan. The best approach for Strategic Housing Market Assessments is a twin track approach under which the London-wide SHMA provides the strategic context for boroughs to work together to carry out sub-regional housing market assessments. The London-wide SHMA provides the context for LDF preparation and consideration of individual development but must be complemented by sub regional and local needs assessments.

Tenure mix

- 3.3 Affordable housing sites in neighbourhoods with significantly above the average proportion of existing social rented provision may be appropriate for a higher proportion of market housing and a higher proportion of intermediate housing provision in the affordable housing mix. Conversely, sites in areas with significantly lower levels of social rented housing than the average may be appropriate for a higher proportion of affordable housing provision (and a higher proportion of social/affordable rented housing within the overall affordable housing mix).
- 3.4 In developing local policies boroughs may wish to test the following benchmarks:
- promoting affordable housing delivery in neighbourhoods with more than three quarters market housing, using their full range of housing and planning powers (for example, encouraging purchase of existing homes for use as affordable housing), and
 - promoting a lower proportion of social housing in neighbourhoods with more than fifty per cent social housing

Older persons housing

- 3.5 The SPG recognises that there will be a continued need to plan for older persons housing including mainstream housing, specialist housing and registered care homes. Good physical access to shopping and other services can enhance social relationships across the community and in particular redress isolation among older people. Provisional research from the Outer London Commission suggests that this makes town centre and edge of centre locations suitable for new purpose built accommodation especially for the active elderly.
- 3.6 Categorising older persons housing can be difficult, some have a well defined element of care (Use Class C2) whereas other appear to be on the cusp between this and conventional housing (use class C3). Development proposals should not be categorised incorrectly to avoid S106 contributions which are normally expected of C3 developments.

4. PART 4 - Affordable Housing

- 4.1 This section provides guidance on implementing the London Plan housing policies to secure affordable housing. This guidance takes account of Government's new Affordable Rent category. The Mayor has already published a Draft SPG Affordable Housing Note on the use of affordable rent and its use in implementing the London Plan's policies. The final version of the Note will be incorporated in the final version of this Housing SPG.
- 4.2 The Mayor has also published early alterations to the London Plan to reflect the affordable rent product introduced by the Government.

The 60% social and 40% intermediate affordable housing targets

- 4.3 The SPG advises that given the new affordable rent product is intended to address the housing need of those eligible for social rent and there will be considerable overlap between the two categories in terms of rent levels, affordable and social rent should be considered together as part of the 60% social housing component. However, it is important that the 60% target is not used to cap provision of the affordable rent product.
- 4.4 In seeking to maximise output by setting a higher local target than 60% in their LDFs, boroughs should demonstrate on the basis of clear and robust evidence that this would make the best use of affordable housing resources, which are focused largely on the new product.
- 4.5 The minor alterations to the London Plan set a strategic benchmark across the affordable housing programme as 65% of market rents. This is an average benchmark for the spending round and is not a planning policy target that can be applied in Local Development Frameworks or in negotiations on individual schemes as this would raise questions of conformity with the London Plan and National Policy. The definition of the affordable rent product makes clear that it will be available at rents of up to 80% of market rate.

Affordable housing on individual sites

- 4.6 The SPG advises that it is for the boroughs to determine how they use their local targets in coming to a view on individual development proposals. Any site suitable for housing should normally be considered suitable to provide some affordable housing. Whilst site constraints may limit the provision of family housing, this should not preclude the provision of affordable housing for households without children. Whilst the local housing target can provide a useful initial ball park figure for negotiation boroughs are advised to also take into account the preferred mix for the site in terms of tenure, density, unit size, types of provision and maximising all available sources of public sector investment to deliver the optimum scheme profile.

4.7 The calculation of the amount of affordable housing on a site is sometimes undertaken in terms of dwellings. However, there is generally a differential mix requirement for different types of provision (social housing, intermediate provision and market provision). Where the affordable housing categories involve dwellings with larger number of habitable rooms per dwelling, or different sizes of habitable rooms within different tenures it may be more appropriate for the calculation of the affordable housing proportion to be in terms of habitable rooms or floorspace. The affordable housing provision should be calculated in relation to gross rather than net provision, except in relation to estate regeneration.

4.8 In accordance with the London Plan, affordable housing should usually be provided on-site. The SPG advises that off-site affordable housing may be considered in the following exceptional circumstances:

- Where it is possible to secure a higher level of affordable housing on an alternative site
- Where there are existing concentrations of particular types of housing (usually social) and there are demonstrable benefits to be gained by providing new units in a different location, such as to create more mixed balanced communities.
- In order to provide a particular type of housing, particularly family housing
- In locations where off site provision can better sustain strategically important clusters of economic activities.

5. PART 5 - Stock and Investment

5.1 Part 5 covers the existing housing stock and the need to continue to invest in improving its quality. Improving existing stock reduces pressure on London's scarce capacity to accommodate new provision, improves quality of life for residents and typically reduces energy costs for them.

5.2 There are strong pressures in parts of London for second homes and non-permanent visitor accommodation. While these types of provision are important to London's economy, the thrust of national and London policy to increase housing provision for residents means that such uses of the housing stock and potential housing capacity should be resisted.

Estate Renewal

5.3 The London Plan states that the redevelopment of affordable housing should not be permitted unless it is replaced by better quality accommodation, providing at least an equivalent floorspace of affordable housing.

5.4 The SPG advises that in determining whether there is a loss of affordable or overall housing provision this can be based on habitable rooms rather than dwellings, where the redevelopment of an estate is providing a housing mix more appropriate to the needs of both existing and prospective future

residents. For example, where there is increased provision of dwellings for larger households.

Empty Homes

- 5.5 The London Plan requires boroughs to set and monitor targets for bringing vacant homes back into active use. The SPG draws Borough's attention to the scope to address the incentive to leave properties empty provided by discounted Council Tax rates for homes vacant for more than six months and the need to encourage involvement of the community in bringing empty homes back into use.

6. PART 6 – Social Infrastructure

- 6.1 Social infrastructure is integral to the creation of sustainable lifetime neighbourhoods. It is therefore important to plan for social infrastructure in tandem with residential development not only to improve the quality of life of residents in new development, but also to avoid placing strain on existing infrastructure to the detriment of existing communities.

- 6.2 The SPG emphasises that investing in social infrastructure can increase both the value of the units being developed and their rate of sale. Addressing social infrastructure issues from the outset can ensure that the development is attractive to communities and viable as well as being fully sustainable when completed. Further guidance on planning for social infrastructure will be provided in the Mayor's forthcoming Shaping Neighbourhoods SPG.

- 6.3 London Plan policy 3.2 states that the impacts of major development proposals on the health and wellbeing of communities should be considered through the use of Health Impact Assessments (HIA). A methodology for carrying out HIAs will be provided in the forthcoming review of the Mayor's Best Practice Guidance (BPG) on Health issues in Planning. In the interim boroughs and developers are advised to consider whether the proposal encourages and promotes housing quality and good access to public services to assess whether housing development proposals provide opportunities for promoting health and wellbeing.

7. PART 7 - Mixed Use Development

- 7.1 The London Plan provides flexibility/scope for changes from surplus office to other uses providing overall capacity is sustained to meet London's long term office needs, in this context the SPG advises that it is essential that local implementation is properly evidenced, planned and monitored
- 7.2 Strategically significant office renewal and new office development should be consolidated in the most competitive locations where a market can be developed for existing and new occupiers. Mixed use development with a strong residential component could play an important part in the office

renewal process. The SPG identifies Romford as a location where this type of mixed use development/ redevelopment could be appropriate.

- 7.3 The SPG states that opportunities for play and other amenity spaces tend to be more constrained in town centres so a lower proportion of family homes may be appropriate in these locations.
- 7.4 In some circumstances, implementation of mixed use policy will require flexible application of affordable housing policy, providing this flexibility does not compromise achievement of the broad strategic objective to maximise provision. Higher density development of affordable, probably 'Intermediate' homes for smaller households will generally be most appropriate in town centres with higher PTALs, although this should not rule out some carefully designed provision for families particularly, perhaps, as Affordable Rent housing.