

23-27 Arlington Works, Arlington Road, Twickenham

LPA Ref: 18/2714/FUL

PINS REF: APP/L5810/W/20/3249153

Proofs of Evidence of Michael Wood MRTPI

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Road, Twickenham
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MRTPI

December 2020

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Document 1

Panel of Inspectors Report on the examination in the Further Alterations to the London Plan (2014)

Document 2

Panel of Inspectors Report on the examination in the Further Alterations to the new London Plan (2019)

Document 3

Secretary of State letter to the Mayor of London and Directions on new London Plan (March 2020)

Document 4

Mayor of London letter to Secretary of State (December 2020)

Document 5

Secretary of State letter to the Mayor of London and Directions on new London Plan (December 2020)

Document 6

London Borough of Richmond upon Thames Strategic Housing Market Assessment 2016

Document 7

Inspector's Report to the examination of the London Borough of Richmond upon Thames Local Plan

Document 8

Richmond upon Thames Local Plan Authority Monitoring Report – Housing, November 2020

Document 9

Ratio of house price to workplace-based earnings (median and median), 1997 to 2019'

Document 10

UK House Price Index: data downloads October 2020' – Richmond upon Thames Extract

Document 11

Median monthly private rental price in England, by local authorities and bedroom category, 1 April 2019 to 31 March 2020, ONS' - Richmond upon Thames Extract

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Document 12

14/3011/FUL – application form

Document 13

List of sites identified as deliverable that have not
started and have expired planning permissions

Document 14

18/3310/FUL – decision notice

1. Qualifications and Experience

- 1.1. My name is Michael Wood and I am an Associate Director of Town Planning at WSP. WSP's Planning Consultancy service provides a wide range of public and private sector clients, including house builders, property investment companies, development companies, retailers, local authorities and registered providers. WSP Planning Consultancy works throughout the UK and Ireland with several offices nationwide.
- 1.2. I have a Masters of Science in Town Planning and Practice and Research awarded in 2010 from Cardiff University. I have been an accredited Member of the Royal Town Planning Institute (MRTPI) since 2014.
- 1.3. I have ten years experience working in planning. I joined WSP (then known as Indigo Planning) in 2014, prior to this I worked in the public sector as a planning officer and planning enforcement officer at Waverley Borough Council between 2010 and 2014.
- 1.4. I have co-ordinated and worked on many different types of development projects throughout the UK but primarily in London and the South East. I currently advise a mix of public sector and private sector clients.
- 1.5. I have been advising Sharpe Refinery Service Ltd on housing land supply matters during 2020. I am very familiar with the site and the locality, as well as with the detail provided within my Proof of Evidence.

1.6. I am aware that my professional duty, in accordance with the guidelines and standards of the Royal Town Planning Institute, is to the Inquiry, irrespective of by whom I am instructed. I confirm that the evidence I produce here has been done so with due diligence and is truthful, representing my honestly held professional view.

2. Introduction

- 2.1. This Proof of Evidence has been prepared in consideration of the London Borough of Richmond upon Thames' (LBRT) housing need and land supply position. The appeal scheme proposes the delivery of 24 new residential dwellings and, therefore, the weight attributed to the delivery of new housing in the Borough (and the wider London region) is material to the determination of this appeal.
- 2.2. LBRT's latest five year housing land supply position is set out in Local Plan Authority Monitoring Report - Housing Statement, dated 16 November 2020 and supported by Housing Trajectory and Summary Tables 2019/20.
- 2.3. This Proof of Evidence considers LBRT's published five year housing land supply position as well as the wider housing need of LBRT and the wider London region. My evidence demonstrates that there is an exceptional housing and affordable housing need in LBRT that is not being met by either the adopted or emerging minimum housing targets within the London Plan. Furthermore, my evidence will demonstrate that LBRT's housing land supply position is far from robust and fails to provide five years' worth of housing land supply against the draft London Plan targets.
- 2.4. In this context, my evidence demonstrates that, if the new London Plan is adopted in its expected form, in regard to housing targets, (The London Plan Intent to Publish, December 2019) ahead of the Inquiry or the determination of this appeal then this appeal should be determined in the context of Paragraph 11 with the tilted-balance in favour of the proposals applied.
- 2.5. My evidence should be read in conjunction with that of Mr Philip Villars who provides evidence on general planning matters in relation to the appeal scheme.

3. Planning Policy and Guidance

3.1. In this section, I provide an overview of the key planning policies relating to housing land supply relevant to the appeal proposal and their significance.

3.2. This section of my evidence should be read in conjunction with the analysis of policy conveyed in Mr Philip Villars' evidence.

National Planning Policy Framework

3.3. The government's planning policies for housing are set out in the National Planning Policy Framework (NPPF), February 2019. The policies contained within the NPPF are a material consideration of significant weight to the determination of this appeal.

3.4. The NPPF sets a presumption in favour of sustainable development for both plan-making and decision-making. Paragraph 11 states:

For decision-taking this means:

- c) approving development proposals that accord with an up-to-date development plan without delay; or
- d) where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁷, granting permission unless:
 - i. the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or
 - ii. any adverse impacts of doing so would significantly and demonstrably

outweigh the benefits, when assessed against the policies in this Framework taken as a whole.

- 3.5. In defining policies which are deemed to be “out-of-date”, footnote 7 to paragraph 11 states:

“This includes, for applications involving the provision of housing, situations where the local planning authority cannot demonstrate a five year supply of deliverable housing sites (with the appropriate buffer, as set out in paragraph 73); or where the Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement over the previous three years. Transitional arrangements for the Housing Delivery Test are set out in Annex 1.”

- 3.6. When considering the application of paragraph 11 of the NPPF, in particular whether the local authority is able to demonstrate a five year housing land supply, I have referenced the Planning Practice Guidance (PPG) Reference ID: 68-002-20190722.

- 3.7. Paragraphs 59 – 61 of the NPPF (below) identify that it is the government’s objective to significantly boost the supply of homes and the policies should seek to deliver the minimum number of homes **needed** unless exceptional circumstances justify otherwise:

“59. To support the Government’s objective of significantly boosting the supply of homes, it is important that a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is

developed without unnecessary *delay*.”

60. To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.

61. Within this context, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers²⁵, people who rent their homes and *people wishing to commission or build their own homes*²⁶).”

3.8. Paragraph 60 references local housing need and the use of the standard method for calculating this need. The application of the standard method is detailed within the PPG Reference ID: 2a-001-20190220.

3.9. Paragraph 48 identifies that:

Local planning authorities may give weight to relevant policies in emerging plans according to:

- a) the stage of preparation of the emerging plan (the more advanced its preparation, the greater the weight that may be given);

- b) the extent to which there are unresolved objections to relevant policies (the less significant the unresolved objections, the greater the weight that may be given); and
- c) the degree of consistency of the relevant policies in the emerging plan to this Framework (the closer the policies in the emerging plan to the policies in the Framework, the greater the weight that may be given).

3.10. The treatment of emerging policies is highly material to this appeal in particular the consideration of housing need and supply given the status of the draft London Plan.

The Development Plan

3.11. Section 38(6) of the Planning and Compulsory Purchase Act requires applications to be determined in accordance with the statutory development plan, unless there are material considerations indicating otherwise.

3.12. The development plan for the appeal proposal comprises:

- London Plan (2016);
- Richmond Local Plan (2018); and
- West London Waste Plan (2015)

The London Plan (March 2016)

3.13. Policy 3.3 of the London Plan recognises the pressing need for more homes in London and identifies that the Mayor will seek to achieve at least an annual average of 42,000 net additional homes across London. The policy references Table 3.1 which sets out each Boroughs' minimum annual average housing target between 2015 and 2025, advising that each borough should seek to "achieve and exceed"

these targets.

- 3.14. Table 3.1 identifies a minimum annual housing target in LBRT of 315 dwellings per annum (dpa). Annex 4 provides a breakdown of the housing targets within Table 3.1. In LBRT it is anticipated that all 315 of its per annum housing target will come from conventional supply and none from vacant homes returning back into use.
- 3.15. The subtext to Policy 3.3 confirms, at paragraph 3.16b that the housing targets do not represent the actual housing need for London over the plan period. This paragraph confirms that the central projections of the London Strategic Housing Market Assessment (SHMA) for the plan identified a need of approximately 49,000 net new homes (if taking a period 2015-2036) and 62,000 over the shorter 2015 – 2026 period.
- 3.16. It is clear, therefore, that the level of household growth identified in the adopted London Plan housing targets does not represent anticipated household growth (need) expected over the life of the Plan. In particular the ten-year targets (2015-2025) fall significantly short of the amount of housing needed during this period of 62,000 dpa.
- 3.17. Paragraph 3.18 of the London Plan confirms that when preparing their own local plans, London Boroughs must demonstrate that they have sought to significantly boost the supply of housing consistent with the NPPF. This should mean, as a starting point, seeking to address OAN, now Local Housing Need (LHN).
- 3.18. The context of the housing need shortfall in the London Plan and the minimum housing targets influence Policy 3.4 which encourages developments to optimise the housing output of land and that development proposals which compromise this policy approach (i.e. under-delivery housing on sites) should be resisted.

- 3.19. Policy 3.11 of the London Plan identifies an affordable housing target of at least 17,000 affordable net additional dwellings per annum across London.

Inspectors Report to the London Plan (November 2014)

- 3.20. The Inspector's Report on the examination into the Further Alterations to the London Plan was published on 18 November 2014. A copy of the report is provided at **Document 1**.

- 3.21. The Inspector recognised that the housing targets outlined in the FALP failed to meet London's objectively assessed need (OAN). In order to meet London's OAN (including the backlog) over 10 years would require a build rate of 62,000 dwellings per annum (dpa). Meeting need over a 20 year period would require a rate of 49,000 dpa (para.28).

- 3.22. Paragraph 32 of the Inspector's Report states that:

“Paragraph 3.18 of the FALP warns London Boroughs that for their local plans to be found sound ‘they must demonstrate they have sought to boost supply significantly by meeting the full objectively assessed needs for market and affordable housing in the housing market area’. FSC3.1 and FSC3.3 introduce a requirement for London Boroughs to, amongst other things, meet the target set out in Table 3.1, relate this to their own assessment of need and address any gap between supply and need by seeking to exceed the target. It goes on to state that this should be done by, amongst other things, finding additional sources of supply and through the duty to co-operate”

- 3.23. The above paragraph implies that London Boroughs should each consider how they can address the gap between the London Plan housing targets and full OAN.

3.24. The Inspector concludes that the London Plan strategy would not meet London's housing need. At Paragraph 57:

"The evidence before me strongly suggests that the existing London Plan strategy will not deliver sufficient homes to meet objectively assessed need."

3.25. The Inspector's letter mitigates its decision to recommend adoption of the Plan on the basis that the amended plan was an improvement on the previously adopted version and that the GLA commits to undertake an immediate review of the Plan and its housing targets. Paragraph 58:

"Non adoption of the FALP would result in the retention of the existing housing targets in the London Plan (32,210 dpa) which are woefully short of what is needed. Despite my reservations, therefore, I consider that, subject to a commitment to an immediate review, the FALP should be adopted as not to do so would perpetuate the existing under delivery by not requiring Boroughs to increase supply."

The London Plan Intend to Publish, December 2019 (draft)

Status and progress

3.26. In December 2019 the Mayor published a revised version of the draft London Plan which amended the previous draft version that was submitted for Examination in 2018. Following the examination hearings, the Panel's Report was published on 8 October 2019 (**Document 2**) setting out a number of recommended modifications to the Plan which have been incorporated in the Intend to Publish version.

3.27. Whilst a number of the Panel's recommendations were incorporated within the

revised version, some were not and, therefore, the Mayor was required to consult the Secretary of State before being able to adopt the Plan.

- 3.28. On 13 March 2020 the Secretary of State wrote to the Mayor advising that the draft plan does not satisfactorily address housing delivery and, therefore a number of Directions were made to the Plan. Both the letter and these Directions are provided at **Document 3**.
- 3.29. On 9 December 2020 (**Document 4**) the Mayor wrote a letter to the Secretary of State advising that he would intend to publish the draft London Plan on 21 December 2020 unless he heard further from the Secretary of State. The Secretary of State responded to this on 10 December 2020 requesting that the Plan is re-published with the Directions previously suggested as well as a further set of Directions issued with the letter (all provided at **Document 5**).
- 3.30. On 21 December 2020 the Mayor wrote to the Secretary of State and published a revised version of the draft London Plan incorporating many of the modifications in the direction. The Mayor identifies that he intends to formally publish / adopt the new London Plan on 1 February 2021 following the requisite six-week consultation period for the Secretary of State to provide further comment.

Inspector Panel's Report

- 3.31. The Panel's Report to the new London Plan considers in detail the housing need and supply position across London. The Panel's recommendations have resulted in significant changes to the housing policies within the draft Plan.
- 3.32. The 2017 London SHMA identifies a need for 66,000 dpa between 2016 and 2041, a significant uplift from the 49,000 dpa need identified in the 2013 version supporting the currently adopted London Plan. The Panel accepts that this is a justified and reliable position to establish London's housing needs and supported

the Mayor's attempts to deliver this need.

- 3.33. The new London Plan includes a small-sites policy for developments on sites less than 0.25 ha. In the original draft of the London Plan (which sought to deliver close to the full OAN identified above within its minimum housing targets), an annual average housing supply of 24,573 dpa was to come from these small sites. The Panel concluded that this target was unrealistic and would not be achievable so reductions in the small-sites targets were recommended to reduce the average annual target to just 11,925 dpa. This has a knock-on effect to the overall housing targets within the draft plan reducing from 65,000 dpa to 52,000 dpa. Addressing this shortfall against housing need, at paragraphs 175 and 177 the Panel note:

“175. Given the failure to meet, by some margin, the identified annual need for housing of 66,000 units we did consider during the examination in public whether this Plan should be paused for further work to be done. Alternatively, we considered whether we should determine that it does not meet the tests of soundness and so should be withdrawn. The Regulations make no provision for either eventuality but rather assume that recommendations will be contained in this report. In any event, it is evident that either course of action would lead to a considerable delay creating uncertainty and thwarting the publication of other strategic policies. There would also be a “knock-on” effect for new borough plans.”

177. Of course, it is a major concern that the targets are so far below the assessed need. However, the evidence simply does not justify the reliance placed by the Mayor on small sites to fill the gap between the two and we are sceptical about the delivery from this source. This Plan does not provide the key to unlocking any

potential. To accept the targets attributed to many of the boroughs would be setting up the Plan to fail. It is likely that some of them would be unable to demonstrate a 5 year supply of housing sites as the Housing Delivery Test would apply to individual boroughs and so result in adverse impacts. The Plan would also impose undesirable consequences on Londoners as plan-making at local *level would struggle to achieve unrealistic expectations.*”

Content of the draft London Plan

- 3.34. As noted above, the key housing policies within the latest version of the draft London Plan relate to the minimum housing targets attributed to each London Borough. Draft Policy H1 confirms that Table 4.1 provides these targets, in LBRT the minimum housing target is 411 dpa which is a significant reduction from the originally submitted draft of 811 dpa.
- 3.35. Draft Policy H2 states that Boroughs “should pro-actively support well-designed new homes on small sites (below 0.25 ha in size) through both planning decisions and plan-making” to help, among other things, deliver much needed new housing. The policy links to a small-sites target for each Borough set out in Table 4.2. For LBRT this figure is 2,340 over the ten-year period which is approximately 56% of the council’s overall target. The original draft of the London Plan identified a target of 6,340 dwellings to come from small sites over this period.
- 3.36. Policy H4 of the new London Plan identifies a strategic target of 50% of all new homes to be “genuinely affordable” and to be sought in line with the affordable housing thresholds applied by Policy H5. For development on industrial land, Policy H4 applies a target of 50% affordable housing where the scheme would result in a net loss of industrial capacity.

London Borough of Richmond upon Thames

- 3.37. The Council's approach to the provision of housing is set out specifically within Policies LP 34 – 39. Policy LP34 reaffirms the adopted London Plan housing target of a minimum of 3,150 new homes between 2015-2025 and then identifies indicative ranges of housing delivery within five broad areas of the Borough, repeated below in Table 1. The policy acknowledges that the minimum London Plan targets will be applied *“until it is replaced by a revised London Plan target”*.

Table 1 – LBRT Local Plan Distribution of Housing

Area	Aprox. No of units
Richmond	1,000-1,050
Twickenham	1,000-1,050
Teddington and the Hamptons	650-700
East Sheen	400-500
Whitton	100

- 3.38. The Plan is supported by the Borough SHMA 2016 (**Document 6**) which concludes that the demographic-based need for housing in the LBRT between 2014-2033 is around 1,047 dpa. Addressing the housing need shortfall against the Local Plan policies, the Inspector's Report to the Examination (**Document 7**) confirms that the plan does not meet its identified housing needs. Paragraphs 35 and 36 confirm that the emerging London Plan provides an opportunity to revisit the housing need shortfall that may necessitate a review of the council's identified constraints. It goes on to recommend modifications to the policy to clarify that the housing targets are not to be considered limits and that the overall housing target should be exceeded.

“35. I am aware that a new London Plan is emerging which will revisit the issue of housing provision across the city and engage within the wider south-east of England on housing requirements. This is a key point and opportunity for the Council to

address positively the content of any new London Plan and challenge itself to review the content of its own Plan to accommodate strategic changes. This may necessitate a reassessment of its currently identified constraints, for example a review of its designated GB and the urban capacity of its existing sites and centres.

36. In the interim, I am satisfied that the submitted Local Plan is based upon robust evidence, is justified by the evidence base, is consistent with national policy and is in general conformity with the London Plan as regards housing. Policy LP 34 establishes the minimum housing target and the broad areas within the Borough which will accommodate the growth. For the effectiveness of the Plan in the *immediate term, I recommend the Council's proposed modification to the text of* Policy LP 34. This clarifies that the indicative targets are not to be considered limits and that the overall housing target is to be exceeded in addition to clarification that a potential review of the Local Plan may be required following the adoption of any new *London Plan (MM3).*"

- 3.39. Policy LP 36 identifies an overall affordable housing target of 50% in LBRT with a minimum of 50% affordable housing to be provided on all former employment sites.

4. Relevant Evidence Base

Strategic Housing Market Assessment London Borough of Richmond upon Thames December 2016

- 4.1. The LBRT Local Plan was supported and underpinned by the 2016 SHMA. The document comprises the most up-to-date assessment of housing need in the Borough, notwithstanding the now standard methodology for calculating Local Housing Need which is considered within these Proofs.
- 4.2. The SHMA 2016 identifies that there is a demographic-based need for an additional 1,047 dpa in LBRT between 2014 and 2033. The 2016 SHMA also identifies a total net-need of affordable housing of 964 dpa between 2014 and 2033.

Richmond upon Thames Local Plan Authority Monitoring Report – Housing, November 2020

- 4.3. LBRT has recently published an updated Authority Monitoring Report (AMR) setting out its housing supply and delivery position as of 1 April 2020 against both the adopted and draft London Plan housing targets (**Document 8**).
- 4.4. The AMR identifies that between 2015 and 2020 the council has delivered 2,083 homes providing 66% of the total ten year target, this amounts to a surplus of 508 against the adopted target.
- 4.5. In assessing its five year housing land supply, the AMR applies a residualised target offsetting the surplus of housing delivered as identified above. This amounts to a reduced housing target requirement over the five year period of 213 dpa which, with a 5% buffer applied, this makes a total five year housing target of 1,120.

4.6. The AMR identifies a total five year housing land supply of 2,219 homes which, when compared to the residualised target of 1,120 dpa amounts to a 10.4 year supply of housing against the adopted London Plan target. The table below sets out this position.

Table 2 – LBRT AMR Five Year Housing Land Supply Calculation (London Plan 2016 Target)

a	London Plan (FALP) Requirement 1 April 2015 to 31 March 2025 (10 year plan period)		3,150
b	Net completions 1 April 2015 to 31 March 2020		2,083
c	Remaining London Plan Requirement 31 March 2020 to 31 March 2025 (5 year plan period)	a - b	1,067
d	Average per year	c ÷ 5 years	213
e	Five year requirement	d x 5	1,067
f	Five percent buffer	e x 0.05	53
g	Total five year requirement (including 5% buffer)	e + f	1,120
h	Estimated supply over five year period		2,219
i	Five year land supply as a percentage of requirement (including 5% buffer)	(h ÷ e) x 100	198%
j	Five year land supply expressed in years	h ÷ d	10.4

4.7. As noted above, the AMR also considers this supply against the new draft London Plan housing target. Again, the AMR takes a residualised approach to establishing the five year housing target, acknowledging that in the first year of the new plan period 2019/20 the council delivered 331 homes, 80 short of the draft 411 target. Taking this shortfall into account, the council applies the residual requirement across the remaining nine years of the plan-period to give an overall five year requirement (including buffer) of 2,204 dwellings. The supply identified above provides 5.3 years' supply against this target.

Table 3 - Five Year Housing Land Supply Calculation (Intend to Publish London Plan 2019)

a	Draft New London Plan Requirement - 1 April 2020 to 1 April 2030 (10 year plan period)		4,110
b	Net completions 1 April 2019 to 31 March 2020		331
c	Remaining London Plan Requirement (9 year plan period)	a - b	3,779
d	Average per year	c ÷ 9 years	420
e	Five year requirement	d x 5	2,099
f	Five percent buffer	e x 0.05	105
g	Total five year requirement (including 5% buffer)	e + f	2,204
h	Estimated supply over five year period		2,219
i	Five year land supply as a percentage of requirement (including 5% buffer)	(h ÷ e) x 100	101%
j	Five year land supply expressed in years	h ÷ d	5.3

4.8. The five year housing land supply identified in the AMR is broken down into six broad categories depending on the status of the site as shown in the table below.

Table 4 – Breakdown of five year housing land supply

Site Type	Total used for 5-year supply
New Build Sites under construction	462
New Build Sites with planning permission	118
Conversion sites under construction	90
Conversion sites with planning permission	118
Conversion sites with prior notification approval	50
Deliverable Sites	1,381
Total 5 year supply	2,219

4.9. The AMR also provides the historic affordable housing delivery since 2015 as shown in Table 5 below, as a total number and as a percentage against overall delivery.

Table 5 - Net completions by tenure and financial year (2005/06 to 2019/20)

Year	Open Market		Affordable		Total Units
	Units	%	Units	%	
2005/06	611	73%	231	27%	842
2006/07	192	83%	38	17%	230
2007/08	257	99%	3	1%	260
2008/09	338	78%	98	22%	436
2009/10	145	100%	0	0%	145
2010/11	273	68%	126	32%	399
2011/12	133	64%	75	36%	208
2012/13	468	67%	227	33%	695
2013/14	202	86%	33	14%	235
2014/15	298	98%	6	2%	304
2015/16	392	80%	99	20%	491
2016/17	398	87%	62	13%	460
2017/18	341	89%	41	11%	382
2018/19	349	83%	70	17%	419
2019/20	298	90%	34	10%	332
Total	4,695	80%	1,143	20%	5,838

- 4.10. In terms of future affordable housing supply the AMR estimates that there will be 182 affordable housing completions over the next two annual monitoring years and estimates to deliver “well over 1,000 affordable homes” in the next ten years.

5. Housing Need

- 5.1. Notwithstanding the five year housing land supply position, which is considered in detail in the following section, the substantial housing need in LBRT and across London should attribute significant positive weight in support of the appeal scheme. The NPPF's aspiration to significantly boost the supply of homes contained within paragraph 59 does not cease to apply when a local authority can demonstrate a five year housing land supply.
- 5.2. Paragraph 59 states that it is important that a sufficient amount and variety of land can come forward **where it is needed**, notwithstanding the supply position at a particular point in time against a policy target, particularly when that target falls well short of the identified housing need.
- 5.3. The failure to deliver housing need, whilst not exclusive to LBRT within the Greater London region, has significant detrimental social and economic impacts as articulate by the Secretary of State's letter to the Mayor on the draft London Plan (**Document 3**):

"Leaving tens of thousands of homes a year needed but unplanned for will exacerbate the affordability challenges within and around the capital; making renting more expensive and setting back the aspirations of Londoners to get on the housing ladder, make tackling homelessness and rough sleeping more challenging and harm the economic success of London."

Housing need and delivery

- 5.4. As noted above, in supporting the Local Plan, the 2016 SHMA identified an OAN within LBRT of 1,047 dpa between 2014-2033. The housing delivery performance identified in the AMR (Table 6 below) demonstrates a consistent failure of delivering even 50% of this need. Cumulatively across the six-year period from 2014 to 2020 there has been a shortfall of 3,894 homes against this identified need.

Table 6 - Net completions by tenure and financial year (2005/06 to 2019/20)

Year	Open Market		Affordable		Total	OAN	Shortfall against OAN	Percentage of need delivered
	Units	%	Units	%	Units			
2014/15	298	98%	6	2%	304	1,047	743	29%
2015/16	392	80%	99	20%	491	1,047	556	47%
2016/17	398	87%	62	13%	460	1,047	587	44%
2017/18	341	89%	41	11%	382	1,047	665	36%
2018/19	349	83%	70	17%	419	1,047	628	40%
2019/20	298	90%	34	10%	332	1,047	715	32%
Total	2,076	88%	312	12%	2,388	6,282	3,894	38%

- 5.5. The upshot of failing to deliver against its housing needs is that housing simply is not affordable in LBRT. According to the 'Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2019', ONS dataset, (**Document 9**) LBRT is the sixth least affordable local authority in England for home ownership. As of 2019, the affordability ratio of median house price to median annual earnings was 18.33. Bearing in mind that a lender is unlikely to offer a mortgage four times an annual salary, an affordability ratio where average earnings are 18 times lower than the average house prices indicates that home ownership in LBRT will be inaccessible for most ordinary people.
- 5.6. The MHCLG 'UK House Price Index: data downloads October 2020', published 16 December 2020 (**Document 10**) identifies the average prices of different types of property in LBRT as of 1 October 2020. Table 7 below identifies the anticipated mortgage cost of these different property types, assuming a 10% deposit and an average mortgage rate of 3% on a 25-year term¹.

¹ HSBC Mortgage Repayment Calculator

Table 7 – Average house prices by type of property in LBRT and anticipated mortgage payments

Property Type	UK Price Index - Average Price	Monthly Repayments	Annual Repayments
Detached Price	£1,465,788	£6,951	£83,412
Semi-Detached Price	£983,664	£4,665	£55,980
Terraced Price	£789,956	£3,746	£44,952
Flat Price	£468,503	£2,222	£26,664

5.7. The private rental market is just as unaffordable, Table 8 below provides the median monthly rental price for different house types sourced from the ‘Median monthly private rental price in England, by local authorities and bedroom category, 1 April 2019 to 31 March 2020’, ONS dataset (**Document 11**).

Table 8 – Median Monthly Rent by property size in LBRT

Property	Monthly Rent	Annual Rent
Studio	£ 950	£ 11,400
One-Bedroom	£ 1,250	£ 15,000
Two-Bedrooms	£ 1,600	£ 19,200
Three-Bedrooms	£ 1,950	£ 23,400
Four+ Bedrooms	£ 3,300	£ 39,600

5.8. The cost of housing directly impacts people’s quality of life. Shelter and the Joseph Rowntree Foundation² suggest that households spending more than a third of their income on rent could experience material hardship or struggle to make housing repayments. Using this metric and the anticipated annual cost of housing identified in Tables 7 and 8, Table 9 below identifies the minimum salary that would be required to access private market housing in LBRT.

² Resolution Foundation (2014) Housing pinched: understanding which households spend the most on housing costs

Table 9 – Estimated salary required to afford private-market property in LBRT

Property	Annual Cost	Salary required
Rental		
Studio	£11,400	£38,000
One-Bedroom	£15,000	£50,000
Two-Bedrooms	£19,200	£64,000
Three-Bedrooms	£23,400	£78,000
Four+ Bedrooms	£39,600	£132,000
Ownership		
Detached Price	£83,412	£278,040
Semi-Detached Price	£55,980	£186,600
Terraced Price	£44,952	£149,840
Flat Price	£26,664	£88,880

5.9. Table 5c of the 'Ratio of house price to workplace-based earnings (lower quartile and median), 1997 to 2019' identifies that the median workplace earnings in Richmond-upon-Thames in 2019 was £35,191, a figure below the anticipated salary required for even renting a studio flat in the Borough.

5.10. Unsurprisingly, the affordability of housing in LBRT has worsened over time as housing needs fail to be met. The Table below demonstrates that between 2010 and 2019, the affordability of housing in LBRT (as defined by the Affordability Ratio) has decreased by 46%.

Table 10 – LBRT Affordability Ratio (median house prices to workplace earnings) 2010 - 2019

Year	Affordability Ratio
2010	12.56
2011	13.04
2012	13.49
2013	14.38
2014	16.17
2015	17.30
2016	18.15
2017	19.91
2018	18.51
2019	18.33

5.11. The evidence from the HPI Index (**Document 10**) suggests that this dramatic decrease in affordability of housing in LBRT is driven almost exclusively by increases in housing costs. Table 11 below shows the increases in property prices between these two periods, well in excess of this 46% figure. This suggests that earnings growth has failed to keep pace with the dramatic increase in housing costs.

Table 11 – HPI Average property price in LBRT 2010 - 2020

Property Type	HPI Average Price 01/09/2010	HPI Average Price 01/09/2020	Increase	Percentage Increase 2010 - 2020
Detached Price	£ 874,502	£1,451,574	£577,072	66%
Semi-Detached Price	£ 583,324	£976,303	£392,978	67%
Terraced Price	£ 469,101	£786,302	£317,201	68%
Flat Price	£ 304,235	£468,054	£163,819	54%

Affordable housing

5.12. In addition to the overall housing need position in the borough, LBRT has a significant affordable housing need challenge. Table 12 below demonstrates that LB Richmond has consistently failed to deliver its affordable housing target as a percentage of the total homes constructed.

5.13. The 2016 SHMA identified a total net-need of affordable housing of 964 homes per annum between 2014 and 2033. The council has failed to deliver this need between 2014 and 2020 (averaging just 52 affordable dwellings per annum during this period). **Cumulatively, between 2014 – 2020 LBRT has delivered just 312 affordable homes against a rolling need that totals 5,784 (964 multiplied by 6), this amounts to just 5% of its identified need over this period.**

Table 12 - Affordable Housing Completions in LBRT against 2016 SHMA need

Year	Open Market		Affordable		Total Units	Affordable Need (SHMA 2016)	Rolling shortfall	Percentage of need delivered
	Units	%	Units	%				
2014/15	298	98%	6	2%	304	964	958	1%
2015/16	392	80%	99	20%	491	964	1823	10%
2016/17	398	87%	62	13%	460	964	2725	6%
2017/18	341	89%	41	11%	382	964	3648	4%
2018/19	349	83%	70	17%	419	964	4542	7%
2019/20	298	90%	34	10%	332	964	5472	4%
Total	2,076	88%	312	12%	2,388	5,784	5,472	5%

5.14. The AMR estimates that there will be 182 affordable homes delivered over the next two monitoring periods which would represent an improvement on recent delivery figures shown above. It also notes that over the next ten years there is the potential to “now deliver well over 1,000 affordable homes”. Despite a possible increase in affordable housing supply, this will go nowhere near meeting the identified need.

5.15. The failure to deliver affordable housing in the Borough should be given significant weight in the planning balance, considering the development will be providing affordable homes.

Standard method for calculating local housing need

5.16. The use of the Affordability Ratio is critical to the 2019 NPPF’s standard method for calculating Local Housing Need (LHN). The PPG at Reference ID: 2a-002-20190220 sets out in detail how the standard methodology should be applied to identify local housing need. Simply put, this uses the 2014 household growth projections (Stage 1) as a starting point, and then an adjustment to take into account affordability (Stage 2), before then applying a cap to the LHN depending on the age of the current housing target (Stage 3).

5.17. Before a cap is applied, the Stage 1 and Stage 2 calculations identify a figure of 2,526 dpa needed in LB Richmond.

- 5.18. The cap is then applied at no more than 40% increase against either the current housing target (315 dpa) when the target is less than five years' old, or the average annual 2014 household formation projections over the next ten year period (which is 1,197 dpa). As the current London Plan target is not yet five years old, the Stage 3-cap reduces LBRT's figure to 441 dpa. It should be noted, however, that the London Plan was adopted in March 2016 and, therefore, if the new London Plan is not adopted before March 2021, the cap to the LHN would defer to the much larger household formation projection. In this scenario, LBRT's LHN would become 1,676 dpa.
- 5.19. On 16 December 2020 the Standard Methodology was updated to include an additional step in the calculation process to apply an uplift to the LHN figure in urban areas. An area identified as urban area (as defined in the extract below), then a 35% uplift to the LHN calculation should be applied.

“Which cities and urban centres does the uplift apply to?”

It should be noted that places can move in and out of the list of the top 20 local authorities in which a cities or urban centre uplift applies. To establish if an uplift applies, the Office for National Statistics list of Major Towns and Cities should be ranked in order of population size using the latest mid-year population estimates. If an authority is based in one of the top 20 most populated cities or urban centres and they contain the largest proportion of population in that city or urban centre, a 35% uplift is applied to that local authority area.”

- 5.20. The PPG addresses how this uplift should be applied to LHN in London at paragraph 034:

“Is a cities and urban centres uplift applied in London and if so, how

does it work?

Yes, an uplift applies in London. London is unique in that it has no single city centre which can carry need for the city area. Therefore a 35% uplift is applied to the entire SDS area (which covers all the London boroughs), rather than to the local authority which contains *the largest proportion of London's population. However, it should be noted that the responsibility for the overall distribution of housing need in London lies with the Mayor as opposed to individual boroughs so there is no policy assumption that this level of need will be met within the individual boroughs.*"

- 5.21. Applying the 35% uplift to the two figures identified above (441 and 1,676 dpa), the recent amendment to the standard methodology would increase the baseline LHN for Richmond to either 595 dpa or 2,262 dpa.

Summary on housing need/targets

- 5.22. Taking all of the above into account it is clear that the current adopted and draft housing targets fall well short of LBRTs housing need. Without immediate action it is likely that the affordability of housing in the borough will worsen as supply continually fails to meet needs.

Table 13 – Summary of housing target and need positions

Source	Annual housing target / need
Adopted London Plan	315
Draft new London Plan	411
2016 SHMA OAN	1,047
LHN (with 40% cap against current target)	595
LHN (with 40% cap against household formation)	2,262

5.23. The evidence provided within this Section of my proof demonstrates the stark and very real housing need in LBRT which has a clear and direct impact on the affordability of housing within the area. Notwithstanding the conclusions reached on five year housing land supply, very significant weight should be attributed to the delivery of much needed housing within this development.

6. Five Year Housing Land Supply

- 6.1. We do not argue that as at the time of drafting, the LBRT five year housing land supply calculation should be based on the adopted London Plan target of 315 dpa. However, this will change very soon either by virtue of the draft new London Plan being adopted or the current target becoming five years' old in March 2021. This is pertinent for considering the possible five year housing land supply scenarios that should be considered when determining this appeal.
- 6.2. Accordingly, this section considers the five year housing land supply position against both the adopted and emerging London Plan targets.

Supply of deliverable sites

- 6.3. The starting point for establishing LBRT's five year housing land supply (5YHLS) is to consider its identified supply as set out in the Local Plan Authority Monitoring Report Housing - 2019/20 and supporting dataset (**Document 8**).

Definition of deliverable

- 6.4. In considering whether the supply identified is "deliverable" we must reference the NPPF definition which states:

"Deliverable: To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. In particular:

- a) sites which do not involve major development and have planning permission, and all sites with detailed planning permission, should be considered deliverable until permission

expires, unless there is clear evidence that homes will not be delivered within five years (for example because they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans).

b) where a site has outline planning permission for major development, has been allocated in a development plan, has a grant of permission in principle, or is identified on a brownfield register, it should only be considered deliverable where there is clear evidence that housing completions will begin on site within *five years.*”

6.5. Since this definition was amended within the 2019 version of the NPPF there has been debate through appeals and the courts as to how it should be interpreted. These debates have primarily focussed on whether the above should be read as a ‘closed list’ or whether the above sets out presumptions of what evidence is required to demonstrate that a housing site is ‘deliverable’ and thus could be applied to types of development not set out on the list. If the latter interpretation is used then developments not included under b) (e.g. applications with a resolution subject to S106) could be considered deliverable where there is clear evidence that housing completions will begin on site within five years.

6.6. In June 2020 the Secretary of State (SoS) has clarified this position in East Northamptonshire Council v Secretary of State for Housing, Communities and Local Government. Case Number: CO/917/2020, the SoS consented to quashing of an appeal decision on the basis of an incorrect approach to this interpretation. In the Statement of Reasons attached to the Consent Order, the SoS confirmed:

"The proper interpretation of the definition is that any site which can be shown to be 'available now, offer a suitable location for

development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years' will meet the definition; and that the examples given in categories (a) and (b) are not exhaustive of all the categories of site which are capable of meeting that definition. Whether a site does or does not meet the definition is a matter of planning judgment on the evidence available."

- 6.7. This conclusion broadens the scope of sites which could be considered deliverable for the purpose of calculating a 5YHLS. In summary, the test should be as follows:
- i. All sites with full detailed planning permission should be considered deliverable until that permission expires unless there is compelling evidence to contest this; and
 - ii. Where sites do not have full detailed planning permission, they will require 'clear' evidence showing they are deliverable before they can be included.

LBRT Supply

- 6.8. The LBRT housing land supply is broken down within the AMR as set out in the following table. Applying the above interpretation of what is and is not deliverable we do not question the principle of any of the sites that are either on site or have full planning permission / prior approval (so the first five rows below). There are, however, several sites within these categories that have either been mis-counted or are included despite planning permission expiring. These are covered in greater detail below under the heading "Deliverable sites with full planning permission".
- 6.9. The final row in the table refers to "deliverable" sites which comprises a relatively small list of seven development sites which, as of the base-date of 1 April 2020, did not have full planning permission, as well as a "small-sites trend" based on the draft

new London Plan. This supply is considered further below under the heading “Deliverable sites”.

Table 4 – Breakdown of five year housing land supply

Site Type	Total used for 5-year supply
New Build Sites under construction	462
New Build Sites with planning permission	118
Conversion sites under construction	90
Conversion sites with planning permission	118
Conversion sites with prior notification approval	50
Deliverable Sites	1,381
Total 5 year supply	2,219

Deliverable sites with full planning permission

- 6.10. The AMR supply includes 108 sites that are currently under-construction delivering a net total of 552 dwellings. Of this supply we only contest the numbers included in the AMR of one of these sites which we believe have been mis-calculated. Application ref 14/3011/FUL is shown as delivering a net increase of five dwellings to the council’s supply, however, the permission is for the creation of six proposed flats replacing seven existing (**Document 12**) so this figure should actually be net minus one. Reducing the supply from this source by seven dwellings.
- 6.11. The next category provided by the AMR is developments with full planning permission that have not started yet (as of the date of publication). The list provided shows 124 such sites delivering a total of 285 homes within the five year period. However, this list includes 14 sites where the planning permission has expired (based on the data provided in the AMR) which cumulatively result in a net supply of 55 dwellings. List provided at **Document 13**.
- 6.12. Whilst we do consider it appropriate to discount these 55 dwellings as being undeliverable, it is acknowledged that the temporary extension of expiring planning permissions in 2020 to May 2021 means that some of these permission would

remain extant until 1 May 2021. Their deliverability in this period, however, should be questioned given they have not commenced on site since 2017.

- 6.13. In addition to the 14 sites highlighted above, there are a further 21 sites with planning permissions which are due to expire in the next six months of 2021 that have not started. There must be considerable doubt as to whether these sites will come forward in this period given they have not done so to-date, if these sites failed to commence then there would be a further reduction in the identified supply by 77 dwellings.
- 6.14. **Combined with the miscounts from the ‘under-construction category my evidence demonstrates that LBRT’s supply should be reduced by a total of 62 dwellings.**

“Deliverable” sites

- 6.15. As noted above, a significant proportion of the 5YHLS comes from sites defined in the AMR as “deliverable”. The supply under this definition can be split between specific identified sites and a windfall-type “small sites trend”
- 6.16. As of the base-date of 1 April 2020 the supply comprised seven sites all of which did not have planning permission. Since the base-date and the updated AMR three of these sites now benefit from either full or outline planning permission. It is accepted that the two schemes with full planning permission fall within criterion a) of the NPPF definition of “deliverable”. However, Barnes Hospital has only been approved in outline and no evidence has been presented to confirm that it will deliver the 83 homes identified within the projected supply within the five year period. Without this evidence, we do not believe it is appropriate for LBRT to account this site towards its 5YHLS position, and the 83 dwellings should be discounted from the supply.
- 6.17. One of the two sites with full permission is the Kew Biothane Plant ref. 18/3310/FUL.

This is attributed a supply of 90 homes. However, the permission is only for 88 dwellings (**Document 14**), therefore, a further two homes should be removed from the identified supply.

6.18. The remaining four sites within this list do not benefit from either an outline or full planning permission and no evidence is provided as to their deliverability within the AMR. These sites are:

- The Stag Brewery, Lower Richmond Road (18/0547/FUL) – 300 homes
- Homebase, 84 Manor Road (19/0510/FUL) – 80 homes
- Old Station Forecourt, Railway Approach, Twickenham (19/3616/FUL) – 46 homes
- Kneller Hall Royal Military School Of Music Kneller Road (site allocation) – 20 homes

6.19. The Stag Brewery scheme has been called-in by the Mayor and dates for Representation Hearing sessions have not yet been set, there is no certainty that this scheme will be approved let alone evidence that it could provide 300 homes delivered within the first five year period.

6.20. The Homebase application has also been called-in by the Mayor and was approved subject to completion of a S106 and draft conditions which remain outstanding. Until such evidence is provided that the scheme can deliver the 80 homes identified, we do not believe it is appropriate for these to be included within the five year supply.

6.21. The Old Station Forecourt application was submitted in November 2019 and was approved by committee in August 2020 subject to a S106 resolution. This is yet to be signed and agreed and, therefore, a planning permission has not yet been

granted. As with the Homebase site, without evidence to demonstrate that this is forthcoming the 46 homes should not currently form part of the 5YHLS.

- 6.22. Finally, the Kneller Hall Royal Military School of Music site is put forward as a deliverable site allocation for 20 homes. This site does not have full planning permission and no evidence has come forward to suggest that it will be delivered in the next five years. Notwithstanding this, it could be contended that such a development of 20 units would constitute double-counting with the small site trend allocation (see 6.24 below).
- 6.23. Given their status without detailed planning permission we do not believe that they should be accounted for within the 5YHLS without detailed evidence to support their deliverability. Accordingly, the 446 dwellings provided by these sites should be discounted until evidence to the contrary is presented.
- 6.24. The remaining “deliverable sites” supply comes from the small-sites trend which applies a rate of 234 dpa for years three-five of the supply period and reduced rate of 20 for the first two years. We accept that use of this figure is supported by the draft London Plan and do not contest this method given this element of the draft new London Plan has not been objected to by either the Panel of Inspectors or the Secretary of State. It should, however, be noted that the trend of small-sites delivery between 2014-2020 has been 177 dpa (shown by Table 12 sourced from the AMR dataset). The delivery of 234 dpa from this source would, therefore, require a significant uplift against past performance on this metric.

Table 14 – Breakdown of five-year housing land supply

Year	Small	Large	Total	% Small	% Large
2013/14	63	172	235	27%	73%
2014/15	238	66	304	78%	22%
2015/16	304	187	491	62%	38%
2016/17	242	218	460	53%	47%
2017/18	165	217	382	43%	57%

2018/19	125	294	419	30%	70%
2019/20	98	233	331	30%	70%
Total	1,235	1,387	2,622	47%	53%
Average	176	198	375	46%	54%

- 6.25. Pulling the above together, until further evidence can be provided to demonstrate deliverability of the questioned sites, **a total of 531 homes should be discounted from the Council's identified supply.**

Summary of identified supply

- 6.26. The evidence above indicates that the identified housing supply of 2,219 dwellings per annum should be reduced by a total of 593 dwellings should be removed from the supply. **This reduces the total supply from 2,208 identified in the AMR to 1,615.**

LBRT five-year housing requirement

- 6.27. The AMR tests LBRT's 5YHLS position against both the adopted London Plan target of 315 dpa and the new draft London Plan target of 411 dpa. Under both scenarios the AMR concludes that the Council has a 5YHLS as broken down by the Tables below, repeated for ease of reference.

Table 2 – LBRT AMR Five Year Housing Land Supply Calculation (London Plan 2016 Target)

a	London Plan (FALP) Requirement 1 April 2015 to 31 March 2025 (10 year plan period)		3,150
b	Net completions 1 April 2015 to 31 March 2020		2,083
c	Remaining London Plan Requirement 31 March 2020 to 31 March 2025 (5 year plan period)	a - b	1,067
d	Average per year	c ÷ 5 years	213
e	Five year requirement	d x 5	1,067
f	Five percent buffer	e x 0.05	53
g	Total five year requirement (including 5% buffer)	e + f	1,120
h	Estimated supply over five year period		2,219
i	Five year land supply as a percentage of requirement (including 5% buffer)	(h ÷ e) x 100	198%
j	Five year land supply expressed in years	h ÷ d	10.4

Table 3 - Five Year Housing Land Supply Calculation (Intend to Publish London Plan 2019)

a	Draft New London Plan Requirement - 1 April 2020 to 1 April 2030 (10 year plan period)		4,110
b	Net completions 1 April 2019 to 31 March 2020		331
c	Remaining London Plan Requirement (9 year plan period)	a - b	3,779
d	Average per year	c ÷ 9 years	420
e	Five year requirement	d x 5	2,099
f	Five percent buffer	e x 0.05	105
g	Total five year requirement (including 5% buffer)	e + f	2,204
h	Estimated supply over five year period		2,219
i	Five year land supply as a percentage of requirement (including 5% buffer)	(h ÷ e) x 100	101%
j	Five year land supply expressed in years	h ÷ d	5.3

Current London Plan

- 6.28. The 10.4 years' supply identified in the AMR against the current London Plan misapplies some key elements of the 5YHLS calculation.
- 6.29. Firstly, LBRT has applied a residualised housing target to the 5YHLS calculation based on the oversupply against the policy target in the first five years of the plan (2,084 completions against a minimum requirement of 1,575). The London Plan targets are to be treated as minimum and, as demonstrated in Section 5 of these Proofs, fall well short of meeting the council's housing needs. As such, to apply a residualised approach which effectively reduces the housing target directly conflicts with the NPPF's objective to boost housing land supply and, in this context, is not appropriate.
- 6.30. To deduct previous oversupply to future need could potentially lead to an artificially low expectation in the future as to what is required in LBRT, despite the clear direction in the London Plan policy that the targets should be treated as minimum.
- 6.31. The second mistake that seems to have been made in the calculation is that the final five year housing supply assessment (at row j in the table) is tested against the five year requirement figure before the buffer is applied. The calculation in the table

above divides the total supply of 2,208 by the annual requirement of 213 dwellings, which is the requirement without the 5% buffer. This requirement should actually be 224 dpa (Row G above divided by ten).

- 6.32. Correcting the above errors, the revised current London Plan 5YHLS position (before revising the supply) would be:

Table 15 - Five year housing land supply calculation methodology with corrections

a	London Plan (FALP) Requirement 1 April 2015 to 31 March 2025 (10 year plan period)		3,150
b	Average per year	$a \div 10$ years	315
c	Five year requirement	$b \times 5$	1,575
d	Five percent buffer	$c \times 0.05$	79
e	Total five year requirement (including 5% buffer)	$c + d$	1,654
f	Annual requirement (including 5% buffer)	$e \div 5$	331
g	Estimated supply over five year period		2,208
i	Five year land supply as a percentage of requirement (including 5% buffer)	$(g \div e) \times 100$	133%
j	Five year land supply expressed in years	$g \div f$	6.7

Draft new London Plan

- 6.33. Similarly, the new London Plan calculation above, also contains two key errors. Firstly, the same mistake regarding the application of the 5% noted above is made in this calculation.
- 6.34. The other notable error is the application of dealing with undersupply in the calculation. LBRT has noted that based on a single monitoring year of this plan-period, there is shortfall of 79 dwellings against the new target of 411 dpa. This shortfall is attributed across the rest of the nine-year plan-period rather than the first five years, this is the application of the 'Liverpool' over the 'Sedgefield' method in dealing with residual shortfall.
- 6.35. It is a matter of judgement based on the circumstances of each case as to which is

the correct approach to follow, however, given the housing context and circumstances to this case, we consider the Liverpool approach followed in the AMR is inappropriate. Notably the PPG at ref Reference ID: 68-031-20190722 firmly supports the use of the Sedgefield method:

“The level of deficit or shortfall will need to be calculated from the base date of the adopted plan and should be added to the plan requirements for the next 5 year period (the Sedgefield approach), then the appropriate buffer should be applied. If a strategic policy-making authority wishes to deal with past under delivery over a longer period, then a case may be made as part of the plan-making and examination process rather than on a case by case basis on appeal.

Where strategic policy-making authorities are unable to address past shortfalls over a 5 year period due to their scale, they may need to reconsider their approach to bringing land forward and the assumptions which they make. For example, by considering *developers’ past performance on delivery; reducing the length of time a permission is valid; re-prioritising reserve sites which are ‘ready to go’; delivering development directly or through arms’ length organisations; or sub-dividing major sites where appropriate, and where it can be demonstrated that this would not be detrimental to the quality or deliverability of a scheme.”*

- 6.36. The second paragraph from the PPG quote above confirms that where local authorities are unable to apply the Sedgefield method they should consider how they boost the supply of housing through various initiatives, one of which could be to grant permission for new deliverable housing developments. So even if LBRT was

correct in using the Liverpool method (which I do not believe they are), it would only emphasise the need to support new housing development proposals such as the appeal scheme.

- 6.37. If the Sedgefield method is applied to deliver housing as soon as possible (i.e. the first five years of the rest of the plan) then the residual five year housing target with the 5% buffer would increase to 2,241 (448 dpa).
- 6.38. Based on these adjustments, the 2,208 homes identified in the AMR's 5YHLS, would only provide 4.9 years' worth of housing against the new London Plan target.

Table 16 - Revised Five year housing land supply calculation methodology - Intend to Publish London Plan 2019 – adjusted

a	Draft New London Plan Requirement - 1 April 2020 to 1 April 2030 (10 year plan period)		4,110
b	Net completions 1 April 2019 to 31 March 2020		332
c	Shortfall	$(a \div 10) - b$	79
d	Five year requirement	$(a \div 10) \times 5$	2,055
e	Five year requirement including shortfall	$d + c$	2,134
f	Five percent buffer	$e \times 0.05$	107
g	Total five year requirement (including 5% buffer)	$e + f$	2,241
h	Annual five year requirement (including 5% buffer)	$g/5$	448
i	Estimated supply over five year period		2,208
j	Five year land supply as a percentage of requirement (including 5% buffer)	$(j \div g) \times 100$	98.5%
j	Five year land supply expressed in years	$i \div h$	4.9

Five Year Housing Land Supply Position - Conclusion

- 6.39. The tables below identify the revised 5YHLS position of LBRT bringing the two elements considered within this Section together. The calculations are based on the above corrections to the application of previous delivery and the buffer as well as the reduced supply.
- 6.40. The evidence indicates that council's 5YHLS position against the current London Plan target is just short of 5 years.

6.41. Against the new London Plan target, LBRT's 5YHLS falls well short with just 3.6 years' worth of housing identified.

Table 17 – Revised Five year housing land supply calculation (FALP)

a	London Plan (FALP) Requirement 1 April 2015 to 31 March 2025 (10 year plan period)		3,150
b	Average per year	$a \div 10$ years	315
c	Five year requirement	$b \times 5$	1,575
d	Five percent buffer	$c \times 0.05$	79
e	Total five year requirement (including 5% buffer)	$c + d$	1,654
f	Annual requirement (including 5% buffer)	$e \div 5$	331
g	Estimated supply over five year period		1,615
i	Five year land supply as a percentage of requirement (including 5% buffer)	$(g \div e) \times 100$	97.7%
j	Five year land supply expressed in years	$g \div f$	5

Table 18 - Revised Five year housing land supply calculation methodology - Intend to Publish London Plan 2019

a	Draft New London Plan Requirement - 1 April 2020 to 1 April 2030 (10 year plan period)		4,110
b	Net completions 1 April 2019 to 31 March 2020		332
c	Shortfall	$(a \div 10) - b$	79
d	Five year requirement	$(a \div 10) \times 5$	2,055
e	Five year requirement including shortfall	$d + c$	2,134
f	Five percent buffer	$e \times 0.05$	106.7
g	Total five year requirement (including 5% buffer)	$e + f$	2,241
h	Annual five year requirement (including 5% buffer)	$g/5$	448
i	Estimated supply over five year period		1,629
j	Five year land supply as a percentage of requirement (including 5% buffer)	$(i \div g) \times 100$	72.1%
j	Five year land supply expressed in years	$i \div h$	3.6

6.42. As noted above, there is a scenario whereby the new draft London Plan is not adopted by March 2021 at which point the appropriate starting point for the 5YHLS calculation would be the standard methodology target of 1,676 dpa (based on the 40% cap being applied to the household formation rate because the adopted target would be more than five years' old). In this scenario, which paints a much closer

picture to the council's housing supply position against its actual needs, the supply identified represents just a 0.9 years.

Table 19 - Revised Five year housing land supply calculation – Local Housing Need

a	Local Housing Need Per Annum		2,262
b	Five year requirement	11,310	11,310
c	Five percent buffer	565.5	565.5
d	Total five year requirement (including 5% buffer)	11,876	11,876
e	Annual five year requirement (including 5% buffer)	2375	2375
f	Estimated supply over five year period	1,629	1,629
g	Five year land supply as a percentage of requirement (including 5% buffer)	13.7%	13.6%
j	Five year land supply expressed in years	0.7	0.7

6.43. If, by the time the appeal is determined, the new London Plan is adopted or the March 2021 date has been triggered, LBRT demonstrably is not able to provide a 5YHLS and, accordingly, the tilted balance in favour of the proposed development should be applied in line with paragraph 11 of the NPPF.

7. Conclusion

- 7.1. It is concluded that the evidence provided demonstrates a clear and urgent housing need situation within LBRT. Neither the current London Plan housing target (315 dpa) nor the draft new London Plan target (411 dpa) come close to meeting the council's actual housing requirements as set out in the most recent SHMA 2016 (1,047 dpa) or the standard method for calculating Local Housing Need (595 or 2,262 dpa).
- 7.2. Between 2014/15 and 2019/20 the total housing delivery in Richmond has resulted in a cumulative shortfall of 3,894 homes against the need identified in the SHMA during this period. This equates to the delivery of just 38% of the boroughs housing needs.
- 7.3. With this gap between the policy minima target and need, it is little surprise that housing within LBRT is, by a variety of measures unaffordable. The median house price in LBRT is over 18 times more than the median annual workplace earnings, making it the sixth least affordable place to own a home in England. LBRT is, therefore, a local authority which must urgently work to significantly boost its supply of housing and, accordingly, housing proposals should be given very significant positive weight in the planning balance exercise.
- 7.4. Furthermore, LBRT has a very poor record of affordable housing delivery against both its policy target (as a percentage of the total homes built) and its affordable housing need. This evidence demonstrates that between 2014 and 2020, LBRT has delivered only 5% of its total identified affordable housing needs. The delivery of affordable housing within the appeal scheme should accordingly be given very significant positive weight.

7.5. The evidence also demonstrates that LBRT has a very tight 5YHLS position based on the current London Plan target and does not have five years' worth of housing land supply if the new Draft London Plan targets are adopted. Our calculations identify that, based on the new London Plan target, the council is only able to demonstrate a 3.6 year' supply of housing. Accordingly, the tilted balance in favour of the development of this housing proposal should be applied.

Appendix 1



Report to the Mayor of London

by Mr A Thickett BA(HONS) BTP MRTPI Dip RSA

an Inspector appointed by the Secretary of State for Communities and Local Government

Date: 18 November 2014

GREATER LONDON AUTHORITY ACT 1999

PART VIII

REPORT ON THE EXAMINATION IN PUBLIC INTO THE FURTHER ALTERATIONS TO THE LONDON PLAN

Examination in Public hearings held between 1 and 18 September 2014

File Ref: SDS0024

Non-Technical Summary

This report concludes that the London Plan as changed by the Further Alterations provides an appropriate basis for the strategic planning of Greater London provided the suggested and further suggested changes are made¹ and my recommendations are accepted.

The recommendations can be summarised as follows:

- Committing to an immediate full review of the London Plan
- Removing references to London Boroughs being required carry out their own assessments of objectively assessed housing need
- Allowing London Boroughs to set their own income criteria with regard to intermediate housing

Abbreviations Used in this Report

dpa	Dwellings per annum
FALP	Further Alterations to the London Plan
GLA	Greater London Authority
IIA	Integrated Impact Assessment
MDC	Mayoral Development Corporation
NPPF	National Planning Policy Framework
OA	Opportunity Area
PPG	National Planning Practice Guidance
PTAL	Public Transport Accessibility Level
SA	Sustainability Appraisal
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SIL	Strategic Industrial Land
TfL	Transport for London

Reference to documents in footnotes and elsewhere such as FA/CD1/01 relate to the document number in the examination library. References such as 01/Session 2 relate to statements submitted to the EiP. For example, 01/Session 2 is the Mayors statement for session 2. All statements can be found on the EiP pages on the GLA's website.

¹ Other than where my recommendations indicate otherwise

Introduction

1. This report contains my assessment of the Further Alterations to the London Plan (FALP) in accordance with the terms of the Greater London Authority (GLA) Act 1999 (as amended) and the Town and Country Planning (London Spatial Development Strategy) Regulations 2000 (the Regulations).
2. The Mayor's London Planning Statement² refers to the requirement in Section 41 of the GLA Act that the London Plan should be consistent with national policy. This is set out in the National Planning Policy Framework (NPPF) which is supported by the National Planning Practice Guidance (PPG). The guidance in the NPPF about plan making generally refers to Local Plans. However, in light of the above and in the absence of anything else, I consider it reasonable and appropriate to apply the soundness tests of paragraph 182 of the NPPF to the proposed alterations, namely that the FALP should be positively prepared, justified, effective and consistent with national policy.
3. The starting point for the examination is the assumption that the Mayor does not consider that the Further Alterations affect the soundness of the London Plan. The FALP was published for consultation in January 2014³ and the Mayor published a Schedule of Suggested Changes in July 2014⁴ (SSC). These suggested changes were considered alongside the FALP during the EiP hearings. During and after the EiP hearings the Mayor put forward a number of further suggested changes (FSC) and a consolidated set of all the changes suggested by the Mayor has been published⁵.
4. Unaltered policies text, tables, maps and figures are not subject to this examination and I have not considered responses outside the scope of the proposed further alterations. This report does not refer to every suggested change, whether it be made by the Mayor or others, or comment on all the representations made whether orally at the hearings or in writing. This report focuses on the matters and issues I consider to be crucial to the soundness of the FALP. Unless specifically referred to in this report, I recommend that the GLA adopts all the suggested and further suggested changes put forward by the Mayor⁶. Any Inspector Recommended Changes are identified in bold in the report (**IRC**) and are set out in full in Appendix 1.

Duty to Co-operate

5. The Mayor's duties to consult and inform are set out in the GLA Act and the Regulations. The Mayor sets out in FA/EX/03 how the statutory requirements to publicise and consult were met and exceeded. Section 33A of the Planning and Compulsory Purchase Act 2004 imposes a duty on local planning authorities and other prescribed bodies/persons to engage constructively with one another with regard to strategic planning matters. The duty to co-operate, therefore, requires more than just to consult and inform.
6. The Mayor is a prescribed person under the Town and Country Planning (Local

² FA/KD/02; adopted as supplementary planning guidance in May 2014

³ FA/CD/01

⁴ FA/CD/06

⁵ FA/EX/64b

⁶ FA/EX/64b

Planning)(England) Regulations 2012 and is bound by the duty to co-operate to engage constructively with London Boroughs, local planning authorities and others inside and outside London in the preparation of their plans. That is not in dispute, but was the Mayor, as argued by some representors, legally bound by the duty with regard to the preparation of the FALP?

7. Section 33A(3) lists the activities to which the duty applies. The first activity is the preparation of development plan documents. The London Plan is part of the development plan for London but the Mayor points to Section 38(2) of the 2004 Act which defines the FALP as a spatial development strategy and not a development plan document. Section 33A(3)(d & e) apply the duty to any activities that can reasonably be considered to prepare the way for or support the preparation of development plan documents. The preparation of the FALP is an activity in its own right but it must, in my view, also prepare the way for and support the preparation of development plan documents.
8. It was argued at the hearing that London Boroughs could prepare their Local Plans in the absence of a spatial development strategy but Section 24(1)(b) of the 2004 Act requires such plans to be in general conformity with the FALP. The FALP sets out housing targets that the London Boroughs will be expected to plan for and sets out other requirements which will guide the preparation of development plan documents. In my view, therefore, the duty to co-operate does apply to the preparation of the spatial development strategy in London. The Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessments (SHLAA) supporting the FALP are London wide in their scope but are also activities which will support the preparation of development plan documents. The SHMA, which includes assumptions relating to migration, is also likely to be material to the preparation of local plans outside London.
9. The PPG states that; '*Cooperation between the Mayor, boroughs and local planning authorities bordering London will be vital to ensure that important strategic issues, such as housing delivery and economic growth, are planned effectively*⁷'. The Mayor has engaged with London Boroughs, particularly with regard to the production of the SHLAA. FA/EX/68 sets out how the Mayor engaged with relevant prescribed persons including the Environment Agency, English Heritage, Natural England and Transport for London (TfL). In April 2012 the functions of the Homes and Community Agency for London were devolved to the Mayor and the relevant officers were involved in preparing the FALP. The London Local Enterprise Partnership (LEP) is chaired by the Mayor and the relevant officers were again engaged in preparing the further alterations. In light of the above and having considered the evidence contained in FA/EX/03 and FA/EX/68, I consider that the Mayor has satisfied the duty with regards to bodies within London.
10. The FALP seeks to accommodate all of the growth to meet London's needs within its own boundaries. Nonetheless, the Mayor has engaged with local planning authorities and others outside London and has established the Strategic Spatial Planning Officer Liaison Group and the Deputy Mayor for Planning has met elected members from the south east. I have seen nothing to counter the assertion that LEPs outside London have been involved in cross boundary co-operation discussions since 2012.

⁷ Reference ID: 9-007-20140306

11. The PPG states that the *'Mayor and waste planning authorities in London should engage constructively, actively and on an ongoing basis with other authorities, under the duty to cooperate, to help manage London's waste'*⁸. There are complaints of a failure to engage from adjoining waste authorities. The FALP predicts a reduction in waste to a level at which London will be self-sufficient by 2026 and so arguably puts less pressure on surrounding waste planning authorities than the existing London Plan. Nevertheless, it is apparent from the representations and from the discussion at the hearings that the Mayor did not engage constructively with adjoining waste planning authorities in formulating the FALP.
12. Under Section 20(7)(C) of the 2004 Act it is not possible to rectify a failure to meet the duty to co-operate and if the duty has not been met, a development plan document cannot be found to be sound. However, as has already been established, the FALP is not a development plan document nor is the GLA a local planning authority. In a strict legal sense, therefore, the failure of the Mayor to comply with the duty does not automatically mean that the FALP cannot be found to be sound. However, the implications of a failure to engage must be assessed and a judgement reached as to whether a lack of engagement means the approach to waste in the FALP is justified and effective. I address these matters in detail later.

Main Issues

13. Taking account of all the representations, written evidence and the discussions that took place at the examination hearings I have identified 7 main issues upon which the soundness of the FALP depends.

Issue 1 - Does the Integrated Impact Assessment⁹(IIA) undertaken to inform the FALP fulfil the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004¹⁰?

14. The PPG¹¹ states that a sustainability appraisal (SA) is a systematic process that must be carried out during the preparation of a plan. It advises further that the SA process is an opportunity to consider ways by which the plan can contribute to improvements in environmental, social and economic conditions, as well as a means of identifying and mitigating any potential adverse effects that the plan might otherwise have.
15. The IIA assessed 4 spatial development options and identified a wide range of key sustainability objectives covering social as well as land use matters including, amongst others, climate change, health and well-being and quality of life. The IIA also considered effects outside London and concluded that the further alterations would have a broadly positive impact when measured against the IIA's sustainability objectives.
16. The IIA assesses the options against the key sustainability objectives. Its depth and coverage is proportionate to the extent to which the further alterations change the aims and objectives of the London Plan and seems to

⁸ Reference ID: 28-044-20141016

⁹ FA/CD/02

¹⁰ The regulations incorporate the requirements of the European Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment.

¹¹ Reference ID: 11-001-20140306

me to be a fair and thorough assessment of the proposed alternatives. I am, therefore, satisfied that the IIA complies with the regulations.

17. The production of the FALP was also informed by a Habitats Regulations Assessment¹² (HRA). The HRA concludes that the new and amended Opportunity Areas are too far away from any European designated sites to have any significant impacts. With regard to the remainder of the alterations, the HRA concludes that subject to changes to Policy 7.19, the FALP will not result in any additional effects to those identified and mitigated within the 2009 HRA. The requisite changes to Policy 7.19 have been made. The HRA's conclusions are not meaningfully challenged and I have neither heard nor read anything to suggest that they are not robust.

Issue 2 – Given that the FALP sets out the objectively assessed housing need for London should London Boroughs be required to undertake their own assessments?

18. The NPPF at paragraph 47 requires local planning authorities to, amongst other things, '*use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area*'. The guidance in the NPPF regarding plan making is silent with regard to how responsibilities should be divided in a two tier system as exists uniquely in London. The London Plan is part of the development plan for London and, in my view, it must be right that read together with the development plan documents produced by London Boroughs, the development plan should be consistent with national policy.
19. However, in a two tier system there should be no need for each part of the development plan to include the full range of policies necessary to accord with all parts of the NPPF or PPG, provided that together they do (as far as is necessary) and are consistent with national policy. The PPG advises that there should be no need to reiterate policies that are already set out in the NPPF in Local Plans¹³. It seems to me that the same principle should apply to a spatial development strategy. Further, to avoid unnecessary duplication and potential confusion, there should be no need for a local plan in London to reiterate policies set out in the FALP.
20. Section 334 of the GLA Act requires the Mayor to prepare a spatial development strategy. That plan must include a statement formulating the Mayor's strategy for spatial development for the use of land in Greater London. Housing need, supply and distribution are undisputedly strategic matters in London. I conclude below that the Mayor's estimate of objectively assessed housing need in London is justified by the evidence submitted to the EiP. Further, although I have reservations, I also consider that the FALP's strategy with regard to supply and distribution can be supported in the short term.
21. Once adopted, statute will require the local plans produced by London Boroughs to be in general conformity with the FALP. That includes conforming with a strategy which seeks to meet London's needs on brownfield land within the existing built up area. The SHLAA identifies most of the existing capacity

¹² FA/CD/05

¹³ Reference ID:12-010-20140306

and, effectively, through the SHLAA, the FALP has determined the extent to which individual Boroughs can contribute to meeting the strategic need for housing across London. Within the confines of the FALP's strategy there is little scope to do more.

22. I acknowledge that the NPPF requires each local planning authority to identify its own objectively assessed housing need. However, in my view, it is the role of the spatial development strategy to determine the overall level of need for London and to guide the distribution of new housing to meet that need. The Mayor points to the acceptance by previous EiP Panels that London constitutes a single housing market area with sub markets which span Borough boundaries. The Mayor also points to the findings of the High Court¹⁴, following a challenge to the Revised Early Minor Alterations to the London Plan, within which in his (undisputed) opinion, the Court accepted that although local variations exist, this did not compromise the view that London constitutes a single housing market area¹⁵.
23. Other than some fine tuning regarding local need relating to the size and type of property and tenure, there is no need, in my view, for each London Borough to duplicate the work done by the GLA and produce their own individual assessment of overall need. **IRC1** recommends that the FALP is changed to reflect this approach by removing references to London Boroughs needing to identify objectively assessed need with regard to the quantum of new housing in their areas.

Issue 3 – Whether the FALP's strategies, targets and policies will enable London Boroughs to meet the full, objectively assessed needs for market and affordable housing in Greater London.

The overall need for new housing

24. The PPG advises that the starting point in assessing objectively assessed need for new housing should be the latest household projections produced by the Department of Communities and Local Government (DCLG)¹⁶. However, the PPG also recognises that DCLG's projections may require adjustment to reflect factors affecting local demography. The Mayor has chosen not to rely on DCLG's projections for reasons set out in detail in his statement to the EiP¹⁷. In brief, the Mayor considers that the methodology underpinning the Office for National Statistics (ONS) 2011 subnational population projections (SNPP) has led, in London, to distorted projections of births, deaths and internal migration flows.
25. The Mayor's approach to population projections was explained at the Technical Seminar and is set out in FA/KD/03g. The GLA's assessment is thorough, based on sound methodology and on logical assumptions. The Mayor's contention that the GLA's population projections have proven to be more accurate than the 2011 based SNPP when measured against the ONS mid-year population data is not disputed. DCLG's household projections for London are based on the 2011 based SNPP and, in the circumstances, I am satisfied that

¹⁴ FA/BD/99

¹⁵ 01/Session 2, paragraphs 2b3

¹⁶ Reference ID: 2a-015-20140306

¹⁷ 01/Session 2, paragraphs 2a3 to 2a19

the Mayor is justified in carrying out his own assessment. The projections are also used by TfL, by many London Boroughs with regard to projected school rolls and to inform other Mayoral strategies. The benefits of using a consistent set of statistics to inform the wide range of plans and strategies being implemented across London weighs in favour of the Mayor's approach.

26. The GLA accepts that there is a significant degree of uncertainty regarding the impact of the recession and recovery on migration. Net domestic out migration from London fell from around 70-80,000 per annum (pa) pre 2008 to 32,000 pa the year after. Levels have begun to increase as the economy has recovered but the trend is difficult to predict. The reasons for this are set out in the SHMA¹⁸ and are far too long and complicated to go into in detail here but are mainly due to difficulties in obtaining accurate/reliable data and the volatility of migration flows which can be affected significantly by changes in the economy, government policy and world events.
27. The SHMA considered three migration scenarios, one based on migration trends being unaffected by the economic recovery, the second assuming a return to pre-recession 'norms' and the third, mid-way between the other two representing a partial return to previous trends. These scenarios resulted in London's population being estimated to rise from 8.2m in 2011 to between 9.8m and 10.4m in 2036. The high and low variants are both plausible and the Mayor is criticised for choosing the central path. However, given the inherent uncertainties set out above and the tentative state of the economic recovery, it seems reasonable not to plan on the basis of the 'extremes'.
28. The central projection assumes that London's population in 2036 will be 10.11m. The GLA's demographers then applied the same methodologies and assumptions used by DCLG to formulate household projections. The outcome is that meeting London's objectively assessed need (including the backlog) over 10 years would require a build rate of 62,000 dwellings per annum (dpa). Meeting need over 20 years would require a rate of 49,000 dpa.
29. Concerns are raised by community groups that the SHMA does not take sufficient account of affordability and does not distinguish between affordable rent, social rent or take sufficient account of minority groups. However, the SHMA complies with the PPG with regard to the assessment of affordable housing and also includes assessments of groups such as students, the disabled and the elderly. The SHMA does not refer to market signals but does recognise the significant problems of affordability in London.
30. The GLA acknowledge that the projections are uncertain, particularly with respect to migration, and this is the main reason why a review of the Plan is planned to start in 2016. However, it seems to me, having considered all the evidence and the submissions, that they are reasonable and probably the best available assessment of objectively assessed housing need for London at this time.

Will the FALP deliver enough homes to meet the identified need?

31. Table 3.1 of the FALP sets targets for the London Boroughs which total 42,389 dpa, around 6,600 dpa short of what is necessary to meet objectively

¹⁸ FA/KD/09, paragraphs 3.10 to 3.34

assessed need over 20 years. The Mayor expressed confidence at the hearings that; by maximising opportunities in town centres, on surplus Strategic Industrial Land (SIL) and in Opportunity Areas, 49,000 dwellings a year could be granted planning permission but was unwilling to commit to increasing the target.

32. Paragraph 3.18 of the FALP warns London Boroughs that for their local plans to be found sound *'they must demonstrate they have sought to boost supply significantly by meeting the full objectively assessed needs for market and affordable housing in the housing market area'*. FSC3.1 and FSC3.3 introduce a requirement for London Boroughs to, amongst other things, meet the target set out in Table 3.1, relate this to their own assessment of need and address any gap between supply and need by seeking to exceed the target. It goes on to state that this should be done by, amongst other things, finding additional sources of supply and through the duty to co-operate.
33. The GLA's officers stated at the EiP that they would work with the Boroughs to increase supply and to ensure that local plans are in general conformity with the FALP. However, in order to be in general conformity with Table 3.1, Boroughs need only meet their individual targets. In the absence of any clear guidance as to exactly how and where the additional 6,600 dpa will be found it is difficult to see how a housing target in a local plan would not be in general conformity if it made provision for the figure in Table 3.1 and no more. There is no mechanism in the FALP to indicate how the 6,600 dpa would be apportioned or distributed. Without this I do not see how the Mayor can guarantee the delivery of the additional 6,600 dpa necessary to meet the identified need.
34. I say above why I do not consider that London Boroughs should be required to carry out their own assessments of overall need. I consider the SHLAA in more detail below but, for the reasons given, I find that it provides a reasonably accurate picture with regard to capacity. It is not easy to see, therefore, where London Boroughs would find additional sources of supply. Capacity could be increased but I have significant concerns regarding whether higher densities can or should always be sought or achieved¹⁹.
35. The PPG advises that the degree of co-operation between boroughs will depend on the extent to which strategic issues have already been addressed in the London Plan²⁰. Further, given that the minimum targets in Table 3.1 are based on the SHLAA's estimate of capacity in each Borough, it is difficult to see how co-operation between them will increase supply. Table 3.19 of the SHLAA compares the capacity within Boroughs to the 2012 DCLG household projections. In all but 9 Boroughs the projections exceed capacity with a total annual shortfall of 10,200. Outer Boroughs could seek help from their neighbours beyond the GLA boundaries but the FALP is not predicated on such an approach.

¹⁹ Higher than the densities set out in the Sustainable Density Quality (SRQ) Density Matrix (London Plan Table 3.2, unchanged by the FALP)

²⁰ Reference ID: 9-007-20140306

The Strategic Housing Land Availability Assessment

36. The figures in Table 3.1 derive from the SHLAA. The SHLAA is London wide, it is a huge undertaking and given the number of sites, it would be unrealistic to expect 100% accuracy. Questions are raised with regard to the treatment of small sites and the assumptions made about the delivery and timing of others. The Mayor worked with the London Boroughs and others in the production of the SHLAA and its results are generally supported. It is argued that the estimates for small sites do not take local conservation and character designations into account. However, the estimates are based on the figures for such development over a 10 year period and, unless local designations are new, should have taken their impact on development into account. The 10 year trend also includes the recession and, in the absence of any alternative London wide analysis, I consider the small sites figures in the SHLAA to be a reasonable assessment of capacity. With regard to large sites, I have neither heard nor read anything to lead me to question the Mayor's assertion that the assumed capacity figures are policy compliant²¹ and that the SHLAA incorporates sensitivity testing. Consequently, I consider that the SHLAA provides a reasonable estimate of capacity.
37. It is not enough to identify capacity. Delivery is critical to meeting the pressing need for new housing in London and one must consider whether and when these sites will deliver the number of homes envisaged in the SHLAA. The SHLAA identifies sites with planning permission and those allocated in development plans. Although it is reasonable to consider sites with planning permission as commitments, the Mayor's 'Barriers to Housing Delivery – Update' of July 2014²² looked at sites of 20 dwellings or more and reports that only about half of the total number of dwellings granted planning permission every year are built. This can also be seen in Table 3.20 of the SHLAA which shows average completions between 2004-2012 of 24,694 pa compared to an average of 58,167 dwellings permitted each year.
38. The average rate of 24,694 between 2004 and 2012 included the pre-recession boom years. The average rate only fell to 23,281 between 2008-2012 indicating that the recession did not hit the house building industry in London as hard as it did elsewhere (and also indicates that the average pre-recession rates can't have been much higher than 24,694). This puts an annual target of 42,000 dpa in context and illustrates that achieving it would represent a significant increase above historical levels.
39. The SHLAA includes a sophisticated phasing system which identifies committed, allocated and other high probability sites in phases 2 and 3 (2015 to 2025, Phase 1 being up to 2015). However, most of the sites in the SHLAA are previously developed. Many are occupied by existing uses and/or are contaminated or have other constraints such as multiple ownerships or environmental issues²³. It will take time for these obstacles to be overcome (and money). Opportunity Areas provide a large chunk of the capacity but will not be delivered quickly. Further, the new targets in Table 3.1 will also need to be worked through to new allocations in Borough's Local Plans.

²¹ For example; amenity, open space and social infrastructure requirements, environmental or heritage matters and flood risk.

²² FA/BD/103

²³ FA/KD/10

40. Even if it can be achieved, 49,000 dpa meets objectively assessed needs (and backlog) over 20 years. The PPG states that local planning authorities should aim to deal with any undersupply in 5 years²⁴. No build rate figure is given to indicate how many new homes would be needed to address the undersupply in 5 years but, as stated above, the rate would need to be 62,000 dpa to meet London's needs in 10 years. That is the total need to 2025 not just undersupply but it is highly likely that the number of homes required to meet need and the undersupply in 5 years would be greater than 49,000 dpa.
41. Reaching 49,000 dpa requires densities to be increased. The Mayor argues that an increase in one PTAL level²⁵ justifies an increase in assumed density. That may be so but it depends on the infrastructure being put in place to improve accessibility. I heard and have no doubt that TfL are working hard to improve London's transport system but it will not be achieved overnight nor will all areas benefit. The impact on increasing densities on townscapes²⁶, existing communities and on social and physical infrastructure also needs to be considered.
42. It cannot be assumed, in my view, that it will be appropriate to increase densities over the existing Density Matrix guidelines in all cases. Town centres are accessible locations but each has its own character which new development should respect. Opportunity Areas and large sites have the potential to determine their own character and identity but they should still have regard to their surroundings. Meeting the pressing need for housing in London will require new, innovative and possibly unpopular solutions but care must be taken not to damage its environment such that it becomes an unpleasant place to visit, live and work.

Affordable Housing

43. The FALP makes few changes to the London Plan's policies relating to affordable housing. The most significant being; increasing the annual target from 13,200 to 17,000 affordable homes per year, changes to the income thresholds and the application of eligibility criteria for intermediate housing and requiring developers to submit appraisals to demonstrate that they are maximising the provision of affordable housing. The definition of affordable housing is not changed and is not a matter for the EiP.
44. The Mayor acknowledges that the FALP target falls short of the need for 25,600 affordable dpa identified in the SHMA. There are calls to increase the target and to require developers to accept higher proportions of affordable houses but the target must be realistic and viable and plans must be deliverable²⁷. The Viability Assessment which accompanies the SHLAA²⁸ assumed, amongst other things, that affordable housing would be provided in accordance with existing policy requirements. 17,000 dpa represents about 40% of the 42,389 dpa target set in Table 3.1 which is consistent with the proportion set in the current plan (overall target; 32,210 - affordable housing target; 13,200). The viability assessment is a high level study and there may

²⁴ Reference ID: 3-035-20140306

²⁵ Public Transport Accessibility Level

²⁶ Including the historic environment

²⁷ NPPF, paragraphs 173 to 177

²⁸ FA/KD/11

be opportunities for achieving more. However, I am satisfied that the assessment demonstrates that the 17,000 dpa target can be achieved without putting the delivery of housing at risk.

45. The FALP increases the upper income limit for eligibility for intermediate housing from £64,300 to £66,000 for one and two bed homes and from £77,200 to 80,000 for 3+ beds. In both cases the lower end of the range is unchanged at £18,100. The upper thresholds are set by dividing the lower quartile London house price by 3.5 (a typical mortgage multiplier).
46. The Mayor accepted at the EiP that in certain parts of London people earning below the upper threshold could afford housing on the open market. The NPPF defines affordable housing as '*social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market*²⁹. It goes on to state that; '*Eligibility is determined with regard to local incomes and local house prices*'. The income eligibility thresholds set in the FALP are based on London wide house prices and, although the GLA argue that there are safeguards in place to prevent affordable housing 'tourism', the approach to intermediate housing in the FALP does not accord with national guidance.
47. The FALP deletes text which allowed eligibility criteria to be set locally to recognise the individual characteristics of local housing markets. London Boroughs would still be able to set local criteria but I consider that the deleted text provides greater clarity and should be reinstated with the FALP thresholds becoming the default position where local income criteria are not set (**IRC2**). Where local eligibility criteria are set the FALP limits their application to 3 months from the point of initial marketing. Some London Boroughs contend that 3 months is too short but I agree with the Mayor that it is important that homes that can meet a need do not stand empty. Boroughs should, through Section 106 Agreements, be able to require developers to notify them in advance of or agree a date for marketing and ensure that local people are aware. However, I do agree that Boroughs should be able to apply local eligibility criteria at the point of re sale or re let (**IRC2**)³⁰.
48. The requirement for developers to provide appraisals to demonstrate that schemes maximise the provision of affordable housing is welcomed. I understand the frustrations expressed by many representors but it is not possible to require developers to divulge commercially confidential information.

Housing for the elderly

49. According to 'Assessing Potential Demand for Older Persons Housing in London'³¹ there is an annual net requirement for 3,900 specialist homes for the elderly (2015 to 2025). The authors used data from the 2011 census to produce individual benchmarks for each London Borough and these are set out in Table A5.1. The table also gives an indication of tenure split.

²⁹ Annex 2: Glossary

³⁰ I asked further questions regarding intermediate housing after the close of the hearings. See FA/EX/77.

³¹ FA/KD/13

50. The data supporting the benchmarks is challenged and I have seen evidence from one London Borough which indicates that the number of care home beds in its area may have been underestimated. However, there can be no doubt that we have an aging population and the Mayor's study reports a lack of new schemes and that a significant amount of the existing affordable rented stock is not fit to house frail older people. Further, the indicative benchmarks in Table 5.1 have been produced to inform the production of local plans and are not targets. The glossary to the FALP includes a definition of specialist housing for older people which should aid Boroughs both in formulating their strategies and in monitoring. It is right, in my view, that the FALP should provide strategic guidance in this regard and require London Boroughs to identify and address the needs of the elderly.

Student accommodation

51. The Mayor's Academic Forum³² considered issues including student numbers, types of provision and distribution and made a number of recommendations to be carried forward into the FALP³³. Not all the members of the Forum agreed with its recommendations and I heard from some who consider the requirement for between 20,000 to 31,000 (2015 to 2025) bed spaces to be too low. I appreciate that the data used by the Forum is around two years old. However, its recommendations are based on a thorough analysis of past and current student numbers, population projections and an evidence based assumption of the proportion of the student population that would be accommodated in purpose built accommodation³⁴. I have seen no equally thorough analysis and am satisfied that the FALP's target is supported by reliable evidence.
52. The FALP encourages a dispersal of student accommodation away from the areas of greater concentration in central London. I appreciate the advantages of students living close to their place of learning but student housing has the potential to contribute to the regeneration and diversification of town centres and to the FALP's aim of addressing London's housing needs by increasing densities in town centres. Student accommodation operates differently to normal rented accommodation and securing and providing affordable student housing provides unique challenges. However, I don't doubt there is a need and it is not for the FALP to set out the detailed mechanisms for securing affordable student accommodation.

Other matters

Housing Standards Review

53. In response to a suggestion from the Secretary of State³⁵ the Mayor proposes a minor change to the Overview and Introduction chapter of the Plan to indicate that a minor alteration will be made at the appropriate time to align the Plan with the Review³⁶.

³² The Forum includes representatives from universities, London Boroughs and providers of student accommodation.

³³ FA/KD/14

³⁴ For a more detailed explanation of the approach see FA/BD/14 or 01/Session 4, paragraphs 4b1 to 4b20

³⁵ FA/EX/67

³⁶ FA/EX/65

London's Living Spaces and Places

54. The FALP's housing target and the need to provide the schools, jobs, health services and other infrastructure to support this increase in new homes will put significant stress on London's existing built environment and its communities. The Plan includes policies which seek to protect local character, heritage assets, open spaces and to create attractive lifetime neighbourhoods³⁷ with the facilities communities need and, in theory, therefore, the FALP includes the tools to ensure that growth is properly managed. However, the Mayor's representative conceded at the EiP hearings that there would be winners and losers. I am concerned that the strategy of accommodating the development necessary for London's growth within its existing built confines³⁸ will place unacceptable pressures on the city's communities and environment.

Conclusions

55. I am satisfied that the Mayor's population and household projections, SHMA and SHLAA are based on good evidence and robust methodology. The household projections and the SHMA point to the urgent need to address the requirement for new housing in London. The GLA is exploring ways to address the need and through the FALP seeking to provide a solution. In addition to the measures described above the Mayor is seeking to reduce the number of vacant homes and encouraging alternative sources of supply such as self build and the private rented sector which can deliver houses faster than traditional build for sale schemes. This is to be supported as is the focus on regeneration and meeting London's needs through the development of brownfield land. However, the strategy has significant and potentially serious implications for delivery and for existing communities which will have to face the consequences of intensifying development in the existing built up area.
56. The targets set in Table 3.1 will not provide sufficient housing to meet objectively assessed need and I am not persuaded that the FALP can ensure that the additional 6,600 dpa will be delivered. Nor do I consider that the Mayor can rely on paragraph 47 of the NPPF or the duty to co-operate to make London Boroughs provide more. It is not enough to grant planning permissions, homes have to be built and the target rate of 42,000 dpa is significantly higher than has been achieved since 2004 and the boom years before the recession.
57. The evidence before me strongly suggests that the existing London Plan strategy will not deliver sufficient homes to meet objectively assessed need. The Mayor has committed to a review of the London Plan in 2016 but I do not consider that London can afford to wait until then and recommend that a review commences as soon as the FALP is adopted in 2015 (**IRC3**). In my view, the Mayor needs to explore options beyond the existing philosophy of the London Plan. That may, in the absence of a wider regional strategy to assess the options for growth and to plan and co-ordinate that growth, include engaging local planning authorities beyond the GLA's boundaries in discussions regarding the evolution of our capital city.

³⁷ Including significant changes to Policy 7.15 relating to managing the impact of noise, which subject to the Mayor's proposed changes, I support.

³⁸ FA/EX/08; Deputy Mayor's Opening Address

58. Non adoption of the FALP would result in the retention of the existing housing targets in the London Plan (32,210 dpa³⁹) which are woefully short of what is needed. Despite my reservations, therefore, I consider that, subject to a commitment to an immediate review, the FALP should be adopted as not to do so would perpetuate the existing under delivery by not requiring Boroughs to increase supply.

Issue 4 – Whether the FALP's strategies and policies enable London Boroughs to meet the need for employment in Greater London.

59. The FALP does not set a target for employment but predicts that the number of jobs could increase from 4.9m in 2011 to 5.8m in 2036⁴⁰. Community groups question the assumptions made in arriving at this figure and the reliance on a survey carried out in 2009 (a more recent study relating to offices was published in 2014). The Mayor acknowledges that predicting levels of employment is not easy but, based on historical trend data, is confident that the projected level of growth over the plan period is as accurate as it can be. With regard to the 2014 office study, uncertainties over forecasts for office floor space and density assumptions led the GLA to conclude that it was safer to rely on the long term trends. I have neither heard nor seen anything to lead me to doubt the Mayor's assertion that past historical projections have performed reasonably well. Further, The City of London and industry representatives support the FALP projection.
60. Historic data also captures the interconnections between the different sectors of London's complex economy. I have seen no evidence to show that the FALP ignores small businesses or the contribution they make. I heard complaints that small businesses are being squeezed out but the London Plan encourages and supports diversity, small businesses and local economies and the provision of suitable work spaces in terms of type, size and cost. Representatives argue that the Mayor does not have an understanding of micro economies and the benefits arising from small businesses being located close together. However, I have seen nothing to suggest that the projections are not based on data relating to the whole economy. Further, the FALP is a strategic plan. The NPPF requires local planning authorities, in preparing local plans, to demonstrate an understanding of the needs of businesses in their area and I see nothing in the FALP to prevent them from doing this.
61. Policy 4.4, which seeks to ensure the provision of a sufficient stock of land and premises is not proposed to be changed but a change to paragraph 4.23 would allow the release of surplus industrial land. This accords with national policy⁴¹ and the need for housing is such that it would be wrong to prevent the re use of industrial land which has no reasonable prospect of being used for employment.
62. In response to the loss of small scale offices to higher value residential and the recommendations of the London Office Review Panel, Policy 4.3 is proposed to be altered to enable Boroughs to protect small scale offices within the Central Activities Zone (CAZ). The policy would also require residential development in the CAZ to compensate for the loss of offices by contributing

³⁹ Table 3.1; 2011 London Plan

⁴⁰ Paragraph 1.24

⁴¹ NPPF, paragraph 22

to the provision of new offices nearby. Boroughs would only be able to do so through their local plans and where supported by local and strategic demand assessments.

63. The change is resisted and it is argued that, amongst other things, it could require the conversion of a single office to one flat to compensate by providing an office elsewhere in the CAZ. This is likely to prove difficult, if not impossible, for the owners with a single property or building. However, research commissioned by the City of London indicates that a pool of smaller, not highly specified and lower cost offices is vital to its economy. Without protection this important resource could be lost and I consider the changes to Policy 4.3 to be justified.

Conclusions

64. Subject to the changes proposed by the Mayor, I conclude that the FALP's strategies and policies will enable London Boroughs to meet the need for employment in Greater London.

Issue 5 – Whether the FALP's strategies and policies will enable London Boroughs to meet the need for retail development in Greater London.

65. National guidance states that planning policies should promote competitive town centre environments and set out policies for the management and growth of centres⁴². The NPPF also requires plan makers to use their evidence base to assess the need for retail floorspace over the plan period⁴³. The FALP identifies a need for between 0.9 net to 2.2 million gross⁴⁴ m² of comparison goods retail floorspace by 2036 (0.4 net to 1.6 million gross m² if schemes in the pipeline are taken into account). Targets for convenience shopping are left to be determined at Borough level where local data and knowledge is more critical.
66. The above figures come from the Consumer Expenditure and Comparison Goods Floorspace Need in London study of October 2013⁴⁵. The study uses accepted methodology and is fine-tuned with London's particular characteristics in mind (e.g. greater use of public transport than other parts of the country). As with housing and employment projections this is not an exact science. For example, the Mayor acknowledges that not all existing vacant retail space will meet modern requirements and such space may not always be in the right place. Consequently, the net figures may be too low. However, the study's findings are generally accepted by representors from the industry. I have seen no better evidence nor have I good reason to disagree with the Mayor's conclusion that the need for comparison goods floorspace will fall within the range identified in the FALP.
67. The level of growth is not as high as that predicted by a study undertaken in 2009 which informed the 2011 London Plan. This is partly down to the recession and to changes in consumer behaviour including the increase in on

⁴² Paragraph 23

⁴³ Paragraph 161

⁴⁴ The net figures assume that all existing vacant floorspace is used up, the gross figure is in addition to the stock of existing vacant floorspace.

⁴⁵ FA/KD/15

line retailing. The Outer London Commission Third Report⁴⁶ (July 2014) found that whilst weaker Major and many District centres may struggle as a result of the expansion in shopping on line, International and stronger Metropolitan and Major centres are most likely to be able to attract continued investment.

68. Whilst this is disputed there can be little doubt that the internet has changed how we shop and that some town centres have suffered as a result. Policy 2.15 is proposed to be altered to encourage Boroughs to ensure that changes in consumer behaviour are taken into account and to manage and minimise any detrimental impacts. That may involve restructuring and the introduction of new, non-retail such as residential, which as well as meeting housing need is likely to improve footfall. I see nothing in these changes to encourage decline nor anything which seeks to marginalise smaller, independent retailers.
69. Policy 2.15Dc3 and Policy 4.8B(c & g) recognise the benefits of clusters of uses, the importance of local shops and services and encourage the re use of surplus commercial floorspace to meet the needs of communities. Policy 4.9, which is not proposed to be changed, encourages decision makers to secure affordable shop units for independent traders in large retail schemes. The strengthening of paragraph 4.48A with respect to the retention of public houses was welcomed by most participants at the EIP⁴⁷.

Retail centre classifications

70. Town centres are classified in Table A2.1 according to their existing role and function⁴⁸. The review of classifications for the FALP was informed by the Consumer Expenditure study referred to above, the 2013 London Town Centre Health Check⁴⁹ and the 2012 London Office Policy Review⁵⁰ and is based on 9 core indicators which include, amongst other things, scale, function and accessibility.
71. It is the GLA's principle not to classify or reclassify a centre until it has proven that it is operating at the required level. The Mayor has considered evidence submitted in response to the FALP consultation and agreed to change the classification of some centres. I consider that an evidence based approach is justified and to classify a centre, as say a District centre, before it has demonstrated that it has the required characteristics would not be sound. Consequently, I do not agree that the Earls Court and West Kensington Opportunity Area should be classified as a District Centre. Further, whilst the Mayor acknowledges that Canary Wharf has some public service functions, I have neither read nor heard anything to question his view that they are not sufficient to warrant promotion to a Metropolitan centre.
72. Policy 4.2 sets out the Plan's approach to provision of offices and Table A2.1 lists those centres considered suitable for speculative office development (A) and those where, although some office use could be promoted as part of

⁴⁶ FA/BD/04

⁴⁷ Suggested change 4.5

⁴⁸ International, Metropolitan, Major, District, CAZ Frontage

⁴⁹ FA/KD/16, 16a & 16B

⁵⁰ FA/KD/17

mixed use schemes, a loss of overall office stock may be acceptable (B)⁵¹. The London Boroughs of Bromley and Kingston upon Thames are unhappy with the demotion of their centres but the decision to do so is supported by the London Town Centre Health Check and the 2012 London Office Policy Review. The change in designation does not preclude either Borough from permitting schemes for office development in their town centres.

Conclusions

73. Subject to the changes proposed by the Mayor, I conclude that the FALP's strategies and policies will enable London Boroughs to meet the need for retail development in Greater London.

Issue 6 – Whether the FALP's aim of achieving waste self-sufficiency for London by 2026 is realistic.

74. The policies relating to waste were subject to a host of suggested changes following the FALP consultation and further suggested changes during the hearings. The majority of suggested changes relate to the use of terminology and are welcomed by the Environment Agency and most other participants.
75. The FALP changes Policy 5.16 by, amongst other things, bringing forward the date by which all of London's waste would be managed within London from 2031 to 2026. It also brings forward the aim of not sending biodegradable or recyclable waste to landfill from 2031 to 2026. The targets have been brought forward in an attempt to speed up waste planning in London and to encourage the adoption of waste plans. The drive to self-sufficiency is welcomed, particularly by waste planning authorities outside London, but concerns are raised regarding whether the FALP does enough to meet these targets.
76. Before I consider that question, the evidence relating to the existing and projected levels of waste arisings is challenged. It is argued that the data is flawed as, amongst other things, it does not take account of waste disposed of at scrap yards (cars, white goods) and I am urged to commit the Mayor to a comprehensive analysis to inform the wholesale review of the Plan. That is not for me to determine but for the purposes of the FALP, the Mayor has commissioned an independent review which considers the GLA's approach to forecasting waste arisings⁵². The authors point to some uncertainties, including the impact of an increasing population on previously falling levels of household waste and the impact of employment growth on construction and industrial waste but generally conclude that the GLA's approach is valid.
77. FSC5.3 makes it clear that the apportionment figures set for Boroughs are not maxima and that they should identify suitable additional sites for managing waste where practicable. The mechanisms for achieving the targets set in Policy 5.16A are outlined in part B of the same policy and are not proposed to be changed. These include targets for recycling/composting and re use of construction, excavation and demolition waste to be met by 2015 and 2020. It is for London's Boroughs/Waste Planning Authorities to develop these aims

⁵¹ There is an additional CAZ designation for the West End and Knightsbridge. Not all centres are designated A or B. All International and Metropolitan centres and most Major centres are designated; the majority of District centres are not designated.

⁵² FA/KD/31, 32 & 33

at the local level and, given the lack of progress, I consider the pressure that will be brought to bear by bringing forward the target to be justified.

78. I heard that the methodology for apportioning waste is the same as that used and found sound in previous London Plan examinations and the figures in Tables 5.2 and 5.3 reflect the latest data. I have some sympathy with those Boroughs which may, because of the designation of a Mayoral Development Corporation (MDC), lose their planning functions in parts of their areas. It cannot be right, in my view, that in such cases, the responsibility for meeting the apportionment should fall wholly on the Borough. **IRC4** proposes the insertion of text into paragraph 5.80 to the effect that the Borough and MDC/s share the responsibility for meeting the apportionment figure for the Borough.
79. The approach to waste in the London Plan and FALP was guided by Planning Policy Statement 10: Planning for Sustainable Waste Management (PPS10). That guidance was replaced in October 2014 by an update to the PPG. I sought the Mayor's view on the implications of the differences between PPS10 and the PPG for the FALP⁵³. It is the Mayor's view, and I agree, that the FALP generally complies with the thrust of the PPG and that any deviation from the PPG is not so significant that it cannot wait for the full review of the Plan.

Carbon intensity floor

80. The carbon intensity floor is a standard set for the greenhouse gas performance of technologies which generate electricity from non-recyclable waste. The Municipal Waste Management Strategy⁵⁴ tested the performance of four residual municipal waste treatment scenarios against the carbon intensity floor using London borough waste data taken from 2009/10. It showed that by sending their municipal residual waste to incineration or gasification plants operating in combined heat and power mode they would comfortably meet the carbon intensity floor level. This supports the argument that the target could be higher but nothing is submitted to show that a more stringent target would not render development unviable. The Mayor has committed to revisiting the requirement in the full review of the Plan (FSC5.4).
81. The FALP makes provision for situations where a user for the heat generated by a waste to energy plant may not be immediately available. The FALP does this by setting out number of demonstrable steps designed to facilitate the use of heat or to make the plant more efficient⁵⁵.

Other matters

82. In my view, it is for the Borough's to consider the implications of locating sensitive uses next to waste management facilities and the ability of those facilities to continue to work effectively. I don't doubt that speculative industrial development may not be best suited for waste management but there is nothing in FALP to prevent the development of suitable buildings.

⁵³ FA/EX/78

⁵⁴ FA/BD/40

⁵⁵ Paragraph 5.85B

Conclusions

83. I concluded earlier in this report that, in my view, the Mayor has not met the duty to co-operate with regard to engaging on strategic waste issues with bodies outside London. I also consider that, unlike with development plan documents, this failure is not fatal. In my view, two factors outweigh the failure to meet the duty; (i) bringing forward the date by which London's waste would be managed within London and the date by which no biodegradable or recyclable waste will be sent to landfill will lessen the overall burden on waste management facilities outside London and (ii) the serious adverse impact of not increasing housing delivery targets.

Issue 7 – Whether the FALP's strategies and policies will enable the Mayor, London Boroughs and others to deliver the infrastructure necessary to support the level growth envisaged in the Plan.

Implementation

84. As indicated above the SHLAA is supported by a viability assessment which concludes that some form of development will be viable in almost all London Boroughs. The London Plan contains a range of policies designed to facilitate the provision of physical and social infrastructure. Achieving and supporting a significant increase in housing will require a co-ordinated effort and Policy 8.1C commits the Mayor to working with Boroughs and service and infrastructure providers. Policy 8.1B states that the Mayor will consider promoting the establishment of new MDCs and other vehicles to drive and facilitate development. Community groups express disquiet with regard to MDCs but the FALP requires the Mayor to work with Boroughs and communities. The Mayor is developing a long term infrastructure plan, setting out London's infrastructure needs to 2050⁵⁶. The final version is expected in early 2015 and will inform the full review of the London Plan.

Opportunity Areas

85. Opportunity Areas (OA) are designed to drive regeneration and are an established feature in the London Plan. The FALP introduces some new OAs and proposes changes to others. Concerns regarding the impact of the levels of development proposed on the character of existing areas and local infrastructure are understandable but I have seen nothing to persuade me that high density inevitably means high rise.

86. The FALP includes a brief description of the type and amount of development proposed in each OA and some guiding ideas/principles. Considerably more work and detail will be required which will need to be carried out as a master planning or similar exercise (at least one is subject to an Area Action Plan). This will provide the opportunity for communities to engage and influence how these areas will be developed. I see no need, therefore, to recommend any changes to any of the OAs.

87. The Mayor accepted the suggestion made at the EiP that text should be added to the FALP to enable other OAs to be brought forward should appropriate

⁵⁶ FA/BD/91

areas be identified⁵⁷. Given the extent of change usually envisaged, I do not consider it likely that altering the London Plan to include a new OA could be considered so minor as to not warrant consultation. Consequently, I do not share representors' fears that new OAs could be designated without informing or engaging local communities.

Transport

88. The FALP envisages that the projected growth in population and employment will lead to an increase from 25 to about 30 million trips per day by 2031⁵⁸. The strategy of minimising growth in travel and ensuring that it occurs in a sustainable way set out in the adopted London Plan is not changed by the FALP. The FALP updates the list of indicative transport schemes at Table 6.1 and the Mayor suggested changes and agreed to further suggested changes following consultation and discussion at the EiP. The FALP also strengthens the Mayor's aim to maximise the use of the Thames⁵⁹ and introduces new text relating to Crossrail 2 and HS2. There were requests at the EiP for additional Crossrail 2 stations but there is insufficient evidence before me to reach a conclusion and, in any event, I do not consider this EiP to be the appropriate place for such decisions.

Cycling and walking

89. In addition to improvements to public transport the FALP seeks to encourage Londoners to cycle and walk. Policy 6.9 commits the Mayor to, amongst other things, implement a network of safe and integrated cycle networks across London, cycle superhighways and to create 'mini Hollands' in up to 4 town centres⁶⁰. Funding has been identified in the TfL Business Plan (£900m) and from other sources⁶¹. Policy 6.10 requires London Boroughs to use their plans to complete the Walk London Network and to ensure that new development does not have an adverse impact on pedestrian amenity⁶². The changes are generally welcomed and the Mayor agreed to further suggested changes which clarify and improve the plan. Some representors would like the FALP to go further but it is a step/pedal in the right direction and there would be an opportunity to develop matters through the full review of the Plan.

90. The cycle parking requirements in the FALP were informed by a review of parking standards both at home and abroad, assessment of demand and an analysis of trends in cycling⁶³. Some representors consider the requirements to be high but the Mayor points to evidence of latent demand (not disputed) and the difficulties of retro fitting cycle parking. The provision of parking is a key element of making cycling a viable alternative to public transport and the car. I consider that the evidence before the EiP supports the cycle parking standards in the FALP (including the further suggested changes in relation to residential development).

Car Parking

⁵⁷ FSCA.4

⁵⁸ Paragraph 6.9

⁵⁹ Paragraphs 7.73 & 7.104

⁶⁰ In outer London Boroughs

⁶¹ 01/Session 8, paragraphs 8b1 to 6

⁶² Matters such as safety, attractiveness, convenience, information and accessibility.

⁶³ 01/Session 8, paragraph 8c5

91. The London Plan sets out maximum car parking standards and although some changes are proposed this principle is not changed by the FALP. The PPG, in recognition that limiting parking has led to problems, seeks to ensure that parking provision is not reduced below a level that could be considered reasonable⁶⁴. The NPPF acknowledges that different policies and measures will be appropriate depending on the characteristics of an area⁶⁵. In London space is at a premium and a good range of travel options will often provide a viable and probably better alternative than the car. A representor at the EiP made a very good point that requiring/relaxing the restraints on the provision of car parking spaces, particularly in inner London, would constrain the ability to maximise the delivery of much needed housing and increase its cost in an already expensive market.
92. I consider that the Mayor's encouragement to a restraint based approach to parking provision in inner London and other locations which benefit from good access to public transport to be justified (FSC 6.15). The further alterations Policy 6.13(E)(d) and paragraph 6.45 recognise the need for flexibility in town centres and will allow London Boroughs to tailor standards to their areas as appropriate. Consequently, I find that the FALP is flexible and strikes an appropriate balance.

Other infrastructure

Energy

93. Policy 5.4A commits the Mayor to work with energy companies, London Boroughs, the Government and others to promote strategic investment in electricity and gas infrastructure to accommodate the growth anticipated in the Plan. Some Boroughs are unhappy with the requirement in the policy that they should work with the industry to establish the gas and electricity infrastructure needs arising from their plans. However, the NPPF requires local planning authorities to work with providers to assess the capacity of infrastructure (including energy) and address barriers to investment (and, consequently, delivery)⁶⁶.
94. The Mayor has set up the London Electricity High Level Working Group⁶⁷ which includes representatives from the public and private sector. Success cannot be guaranteed but I am satisfied that the FALP provides strategic guidance and support for the provision of energy infrastructure.
95. Demand side management measures control the amount of energy used and help reduce carbon dioxide emissions by enabling electrical equipment to be operated at a lower capacity or turned off when it's not needed. I have considered the argument that the FALP should go further than encouraging the use of such measures⁶⁸. However, I am persuaded by the evidence submitted by the Mayor which indicates that there is insufficient knowledge to make it compulsory or set a threshold at this time. The Mayor is hoping that these measures will feature more strongly in future iterations of the Plan.

⁶⁴ Reference ID: 42-008-20140306

⁶⁵ Paragraph 29

⁶⁶ Paragraphs 21 and 162

⁶⁷ FA/BD/118

⁶⁸ Paragraph 5.22a

Water

96. Policy 5.15 (Water Use and Supplies) is unchanged but its supporting text regarding the prudent use of water is strengthened, requiring all new development to be water efficient and encouraging retrofitting efficiency measures. Retrofitting existing buildings is only likely to be secured through the planning system by requiring it as part of a conversion or development scheme. However, making best use of this limited resource is clearly necessary in the light of Thames Water having no plans to develop new water supplies for London until 2027⁶⁹. I heard that the Mayor is working with Thames Water and social housing providers and schools to introduce water saving measures. Thames Water are also installing smart water meters, replacing leaking mains and providing efficiency advice to households on low incomes.

Digital connectivity

97. Policy 4.11 encourages the provision of information and communications technology. Changes are proposed to the policy and its supporting text which make it less specific with regard to particular technologies. It is argued that the FALP will be less effective as a result. However, given the fast changing nature of digital technology, I agree that it is better to be flexible and avoid using terminology which may date.

Overall Conclusion and Recommendation

98. The consultation version of the FALP has a number of deficiencies most of which are rectified by the suggested changes put forward in July 2014 and the further suggested changes which emerged during and after the EiP hearings. However, for the reasons set out above, I do not recommend that the FALP is adopted without the additional changes set out in Appendix 1.

A Thickett

Inspector

This report is accompanied by Appendix 1 containing the Inspector's Recommended Changes

⁶⁹ Environment Agency statement; 048/ Session 9

Appendix 1
Further Alterations to the London Plan Inspector Recommended Changes

SSC; Schedule of Suggested Changes July 2014
 FSC; Further Suggested Changes

Change No.	FALP Page No.	Paragraph(P) /SSC/FSC	Recommended Change New text is <u>underlined</u> and deleted text is Struckthrough .
IRC1	87 & 88	P3.18 FSC3.1 & FSC3.3 3.19i	<p>Amend as follows:</p> <p>As context for this boroughs must be mindful that for their LDFs to be found sound they must demonstrate they have sought to boost supply significantly <u>the supply of housing by meeting the “full, objectively assessed needs for market and affordable housing in the housing market area,</u> as far as is consistent with the policies set out in the Framework”. Of particular importance in this regard is the overarching national objective to secure sustainable development and the need to secure actual delivery. 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.</p> <p>Amend as follows:</p> <p>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:</p> <ul style="list-style-type: none"> <input type="checkbox"/> address in terms of Policy 3.3 the relevant minimum housing supply target in Table 3.1; <input type="checkbox"/> relate this to their assessment of need carried out in terms of Policy 2.2 and 3.8; and <input type="checkbox"/> address any gap between housing supply and need, and to seek to exceed the target through: <ul style="list-style-type: none"> o additional sources of housing capacity, especially that to be brought forward from the types of broad location set out in Policy 3.3; o exercise of their Duty to Cooperate with other local planning authorities;

Change No.	FALP Page No.	Paragraph(P) /SSC/FSC	Recommended Change New text is <u>underlined</u> and deleted text is Struckthrough .
			<p>o 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</p> <p>o 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.</p>
IRC2	106	P3.62	<p>Amend as follows:</p> <p>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", 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. 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, local eligibility criteria for intermediate housing should <u>may be set locally to recognise the individual characteristics of local housing markets</u> but should not compromise the aim of Policy 3.11 to maximise affordable housing provision. In <u>the absence of local eligibility criteria</u>, 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 <u>(whether that be when new or at re-sale or re-let)</u> 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.</p>

Change No.	FALP Page No.	Paragraph(P) /SSC/FSC	Recommended Change New text is <u>underlined</u> and deleted text is Struckthrough .
IRC3	8 & 295	P 0.16 & 8.21	<p>Add the following to the end of paragraph 0.16 and replace the last sentence of paragraph 8.21 with the following:</p> <p><u>This revision has been driven partly by the realisation that the population of London has grown much faster than was anticipated in the 2011 London Plan. However, the extent to which this unexpected level of growth is structural or cyclical is unknown as is the ability of the Plan's existing strategies and philosophy to successfully accommodate the envisaged level of growth. In light of this a full review of the Plan will commence in 2015.</u></p>
IRC4	187	5.80	<p>Add the following to the end of the paragraph;</p> <p><u>Where a Mayoral Development Corporation (MDC) exists or is established within a Borough the MDC will co-operate with the Borough to ensure that the Borough's apportionment requirements are met.</u></p>

Appendix 2



Report to the Mayor of London

by

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Members of the Panel appointed by the Secretary of State

Date: 8 October 2019

Greater London Authority Act 1999

(as amended)

Part VIII

Report of the Examination in Public of the London Plan 2019

The Examination in Public was held between 15 January 2019 and 22 May 2019

File Ref: PINS/SDS0026

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The Examination Library contains numerous documents submitted by the Mayor and representors along with those issued by the Panel. Where necessary, reference is made in this report to relevant documents by their unique number (for example NLP/CD/1, NLP/EX/7.3, NLP/AD45, etc).

Abbreviations used in this report

2004 Act	Planning and Compulsory Purchase Act 2004
2011 Act	Localism Act 2011
AMR	Annual monitoring report
ANPS	Airports National Policy Statement
Assembly	Greater London Assembly
CAZ	Central Activities Zone including Isle of Dogs (north)
EELGA	East of England Local Government Association
FALP	Further Alterations to the London Plan
GLA	Greater London Authority
GLA Act	The Greater London Authority Act 1999 (as amended)
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
IIA	Integrated Impact Assessment for the draft new London Plan (November 2017) and Addendum (July 2018)
KPI	Key Performance Indicators
LDS	Local Development Scheme
Local plan	Any development plan document adopted under the 2004 Act
LPVS	London Plan Viability Study and Technical Report (December 2017) and Addendum (November 2018).
LSIS	Locally significant industrial sites
LVMF	London View Management Framework
Mayor	The Mayor of London
MDC	Mayoral Development Corporation
MHCLG	Ministry of Housing, Communities and Local Government
MTS	Mayor's Transport Strategy
MOL	Metropolitan Open Land
NPPF	National Planning Policy Framework
OAN	Objectively assessed need (for housing)
OLC	Outer London Commission
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
PSED	Public Sector Equality Duty
PTAL	Public transport access level (0-6, a higher number indicating better access to the public transport network)
Regulations	The Town and Country Planning (London Spatial Development Strategy) Regulations 2000
RFRA	Regional Flood Risk Appraisal
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SEEC	South East England Councils
SHLAA	Strategic housing land availability assessment
SHMA	Strategic housing market assessment
SIL	Strategic industrial locations
SINC	Sites of Importance for Nature Conservation
VBC	Vacant Building Credit
WHS	World Heritage Site
WMS	Written Ministerial Statement

Non-Technical Summary

This report concludes that the draft new London Plan published for public consultation in December 2017 provides an appropriate basis for the strategic planning of Greater London provided that it is amended to reflect the Mayor's minor suggested changes (August 2018), the Mayor's further suggested changes (July 2019), and our recommendations set out in this report.

Our recommendations, which are set out in full throughout the report and listed in the attached Appendix, can be summarised as follows:

- Include all minor and further suggested changes unless otherwise recommended in this report.
- Reduce the ten year small site housing targets for boroughs to give a total of 119,250 dwellings (rather than 245,730) and as a consequence reduce the overall housing targets for boroughs to give a total of 522,850 dwellings (rather than 649,350).
- Delete the Mayor's further suggested change policy H2A small housing developments.
- Add to reasoned justification to policy H2 to clarify that borough small site targets can be taken to amount to a reliable source of windfall sites.
- Delete policy H9, in relation to the disapplication of the vacant building credit.
- Delete part C of policy H12 in relation to boroughs setting prescriptive area wide dwelling size mix requirements for market and intermediate housing.
- Delete part B of policy H16 relating to boroughs undertaking gypsy and traveller accommodation needs assessments and add reasoned justification setting out a commitment for the Mayor to lead a London-wide assessment as part of the next review of the London Plan.
- Add reasoned justification to policy G2 to refer to the Mayor leading a strategic and comprehensive review of the Green Belt in London as part of the next review of the Plan.
- Modify policies G2 and G3 relating to Green Belt and Metropolitan Open Land so that they are consistent with national policy.
- Before finalising the Plan, the Mayor should give further consideration to the categorisations of boroughs in Table 6.2 (management of industrial floorspace) to provide a more positive strategic framework for the provision of industrial capacity.
- Add reasoned justification to policy E4 to refer to boroughs considering whether the Green Belt in their area needs to be reviewed to provide additional industrial capacity, and also to refer to consideration being given to identifying locations for industrial development as part of a future London-wide Green Belt review.
- Delete policy SI11 hydraulic fracturing (fracking).
- Delete policy T8 airports, and add northwest runway at Heathrow Airport to Table 10.1 (indicative list of transport schemes).
- Reduce the cycle parking requirements for specialist older persons accommodation and purpose built student accommodation.
- Modify policy DF1 to make it clear that the requirements relating to site specific viability assessments only apply where relevant policies in local plans are up to date.
- Modify various other parts of the Plan to ensure that it is effective, justified and consistent with national policy.

Introduction

1. This is our report following the examination in public (“examination”) of the London Plan held in accordance with the terms of the *Greater London Authority Act 1999* (as amended) (“GLA Act”) and the *Town and Country Planning (London Spatial Development Strategy) Regulations 2000* (“the Regulations”).

The draft new London Plan and the Mayor’s Minor and Further Suggested Changes

2. The London Plan is the statutory spatial development strategy for Greater London prepared by the Mayor of London (“the Mayor”) in accordance with the GLA Act and Regulations. The Mayor published a draft new London Plan, which looks ahead to 2041, for public consultation in December 2017. The consultation period ended on Friday 2 March 2018 by which date over 20,000 representations had been received from around 7,400 individuals and organisations.
3. In response to those representations, and to improve clarity and update matters of fact, the Mayor published “minor suggested changes” to the draft London Plan on 13 August 2018¹. A consolidated version of the Plan, incorporating all of those minor suggested changes was published in August 2018². This was the version of the Plan that we based our matters upon and was discussed at the hearing sessions.
4. Further changes to the Plan were suggested by the Mayor during and following the examination hearing sessions in accordance with procedures that we set out in one of our Panel Notes³. A comprehensive schedule of all of the Mayor’s further suggested changes, along with a further consolidated version of the Plan incorporating all of the minor and further suggested changes, were published in July 2019⁴. Other than where we indicate to the contrary elsewhere in this report, we consider that all of the Mayor’s minor and further suggested changes help to ensure that the Plan is sound or appropriately address issues raised in representations. We therefore recommend that all of the Mayor’s minor and further suggested changes be incorporated when the Plan is finalised for publication under section 337 of the GLA Act unless we explicitly state otherwise in another recommendation [**PR1**].

The Examination in Public and our Recommendations

5. We received copies of all representations made about the draft new London Plan in accordance with section 335 of the GLA Act, along with summaries prepared by the Greater London Authority (“GLA”), on 16 July 2018. We had regard to these before consulting the Mayor and publishing our draft lists of participants and matters to be considered at the examination on 12 September 2018⁵. We then considered the comments received about those

¹ NLP/CD/09.

² NLP/CD/08.

³ NLP/EX/18.

⁴ NLP/CD/013.

⁵ NLP/EX04a-04d.

draft lists before publishing our finalised lists of matters and participants on 13 November 2018⁶.

6. The examination hearing sessions were held between 15 January and 22 May 2019. At those sessions, we considered each of our matters having regard to all of the written evidence before us and the oral contributions made by the participants that we had invited.
7. This report sets out our assessment of each of our matters, and includes a number of recommendations. Our recommendations relate to the content of the consolidated version of the Plan incorporating all of the Mayor's minor suggested changes published in August 2018 referred to in paragraph 3 above but where necessary refer to the further changes published in July 2019 in accordance with paragraph 4. All of our recommendations are identified in bold in the report [**PR1**, **PR2**, **PR3**, etc], and are listed in an Appendix.
8. If the Mayor wishes to publish the London Plan without accepting any of our recommendations, he is required to send a statement of his reasons to the Secretary of State before so doing⁷. The Secretary of State has powers to direct that modifications are made to the Plan to remove any inconsistency with national policy or any detriment to an area outside London⁸.

National Planning Policy

9. The London Plan is required to have regard to the need to be consistent with national policy⁹. Whilst a revised version of the *National Planning Policy Framework* ("NPPF") was published in July 2018, and updated in February 2019, the transitional arrangements¹⁰ mean that we have examined the Plan having regard to the policies in the 2012 version of the NPPF, along with other relevant national policy. Similarly, the previous versions of the *Planning Practice Guidance* ("PPG") apply for the purposes of this examination under the transitional arrangement. All references in this report are therefore to the 2012 version of the NPPF and to the versions of the PPG which were extant prior to the publication of the 2018 NPPF, unless otherwise stated. Nevertheless, we are mindful that future local plan preparation by boroughs will be done in the context of the 2019 NPPF and associated PPG.
10. The legal duty relating to soundness set out in section 20(5)(b) of the *Planning and Compulsory Purchase Act 2004* ("2004 Act") does not apply to spatial development strategies such as the London Plan, and the section on plan-making in the 2012 NPPF refers to local plans rather than spatial development strategies. However, in light of the need to ensure consistency with national policy we have applied the soundness tests set out in the NPPF, namely that the Plan should be positively prepared, justified, effective, and consistent with national policy.

⁶ NLP/EX/08a-08c.

⁷ Regulation 9(2).

⁸ GLA Act section 337.

⁹ GLA Act section 41.

¹⁰ NPPF (2019) paragraph 214 and footnote 69.

11. In addition to the NPPF and PPG, we also refer where relevant to other aspects of national policy, including Written Ministerial Statements and National Policy Statements.

Legal, Procedural and General Matters

12. This section sets out our assessment of a number of legal, procedural and general matters, all of which were discussed at examination hearings.

Did the Mayor comply with all relevant legal and national policy requirements relating to co-operation and public participation?

Duty to Cooperate

13. Section 110 of the *Localism Act 2011* ("2011 Act") introduced section 33A to the 2004 Act, which imposes a duty on local planning authorities and prescribed bodies to co-operate in a range of planning activities. The Mayor is a prescribed person for the purposes of that duty¹¹.
14. However, the London Plan is a spatial development strategy and although it forms part of the development plan for Greater London, it is not a development plan document¹². The preparation of a spatial development strategy is not included in the list of activities to which that duty applies¹³. Furthermore, sections 20(5) and (7) of the 2004 Act, which set out the requirements of an independent examination in relation to the duty to co-operate, refer to a local planning authority and a development plan document only. Application of the duty to co-operate in respect of the Mayor and the preparation of a spatial development strategy is not referred to in the 2004 Act.
15. Some suggest that the preparation of a spatial development strategy is an activity that can reasonably be considered to prepare the way for or support the preparation of development plan documents and on this basis is included in those activities to which the duty applies¹⁴. However, the preparation of the London Plan, London's spatial development strategy, is an activity in its own right. It informs and sits alongside rather than supports development plan documents. Similarly, evidence base documents, such as the Strategic Housing Land Availability Assessment (SHLAA) and Strategic Housing Market Assessment (SHMA), are London wide documents with a primary purpose to support the London Plan itself, rather than individual borough's development plan documents. Although development plan documents must be in general conformity with the London Plan¹⁵, they can still come forward in its absence.
16. It is also relevant to note that the purpose of the London Plan is in effect that of a regional strategy. The 2011 Act saw the removal of the regional tier of Government across England, except in London, where regional governance and the spatial development strategy remained in place. Exclusion of reference to the Mayor and the spatial development strategy in the sections of the 2004 Act referred to in paragraph 13 would not be out of step with that approach.

¹¹ Regulation 4 of the Town & Country Planning (Local Planning) (England) Regulations 2012.

¹² Section 38(2) of the 2004 Act.

¹³ Section 33A(3) of the 2004 Act.

¹⁴ Sections 33A(3)(d) and (e) of the 2004 Act.

¹⁵ Section 24(1)(b) of the Act 2004.

17. Our conclusion, that the duty to cooperate does not apply to the preparation of the London Plan, does not conflict with the PPG that was extant at the time that the Plan was prepared. We acknowledge that the NPPF 2019 indicates that the duty applies to a spatial development strategy¹⁶. In addition, the current PPG sets out explicitly that strategic policy-making authorities are required to cooperate with each other, and other bodies, when preparing, or supporting the preparation of policies which address strategic matters. This includes those policies contained in local plans (including minerals and waste plans), spatial development strategies, and marine plans¹⁷. However the PPG is guidance; it does not change the legal duty and we have assessed this Plan in relation to the NPPF and PPG as set out in paragraph 9 of this report.
18. In coming to the above conclusions, we have considered the findings of the Inspector who examined the *Further Alterations to the London Plan* ("FALP") in 2014. However, on the basis of the evidence before us and for the reasons explained, we have come to a different conclusion on this matter.

Public consultation and participation

19. Under the terms of the GLA Act and Regulations¹⁸ the Mayor has a duty to inform and consult with a number of bodies, including London boroughs and neighbouring authorities. The Mayor provides convincing evidence of extensive consultation with all necessary bodies. This meets the statutory requirements set out above. Furthermore, generally consultation has been active, ongoing and constructive and meets the expectations imposed by paragraph 178 of the NPPF, which sets out a requirement for public bodies to co-operate on planning issues that cross administrative boundaries, particularly those which relate to the strategic priorities.
20. The Mayor's duties in relation to public participation in the preparation of the London Plan are mainly set out in the GLA Act and Regulations¹⁹. Extensive evidence is before us to demonstrate the discharge of the statutory duties above, including consultation with the bodies set out in S32(3) of the GLA Act, particularly through the *City for All Londoners* consultation in 2016²⁰, which included focus groups based on certain demographic characteristics, including bodies representing the interests of different racial, ethnic, national or religious groups. A wide range of groups were consulted on an ongoing process during the preparation of the Plan using different types of communication, from face to face meetings to online discussions and written materials available in different formats and languages. All in all, we are satisfied that due regard was had to the principle that there should be equality of opportunity for all people to engage in accordance with statutory requirements²¹. Furthermore, generally the consultation process accords with paragraph 155 of the NPPF, which sets out the requirement for early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses.

¹⁶ NPPF 2019 para 2 footnote 2 and para 17b

¹⁷ PPG ID:61-009-20190315

¹⁸ Sections 335, 339, 348 of the GLA Act and section 7 of the Regulations.

¹⁹ Sections 32, 33 and 335 of the GLA Act.

²⁰ NLP/CD/010.

²¹ Section 33 of the GLA Act

21. However, concern was expressed that the information regarding consultation, particularly with groups with protected characteristics²², was not clearly set out. The *London Planning Statement Supplementary Planning Guidance* provides a commitment to consultation in the exercise of the Mayor's planning functions, including the preparation of the London Plan. To demonstrate compliance with those high level principles and any other legal requirements, we recommend that the Mayor publishes a statement setting out how consultation requirements will be met when next altering or replacing the Plan along with evidence clearly demonstrating how consultation was actually carried out [PR2]. Whilst we are satisfied with the consultation undertaken this would provide greater certainty to all concerned about what the future expectations are.

Conclusion

22. We are satisfied that the London Plan meets the statutory and other requirements with regard to co-operation and public participation.

Has the London Plan been subject to adequate sustainability appraisal and strategic environmental assessment in accordance with relevant legal and national policy requirements?

23. There is a legal requirement for the Plan to be accompanied by an appraisal of how it contributes towards the achievement of sustainable development²³. As part of this an environmental assessment is required to identify, describe and evaluate the likely significant effects on the environment of implementing the Plan and also of reasonable alternatives taking into account its objectives and geographical scope²⁴. These were addressed as part of the *Integrated Impact Assessment* (November 2017) and Addendum (July 2018) ("IIA")²⁵. In addition, the IIA incorporates an equality impact assessment, community safety impact assessment and a health impact assessment in order that potential effects are considered holistically.
24. The IIA was published at the same time as the draft Plan in December 2017. This accords with the prescribed procedures for an environmental report²⁶ which do not require a further, intermediate consultation. Moreover, additional spatial options were included and assessed following the earlier Scoping Report²⁷. Five of these were tested including the preferred sustainable intensification option. Given that alternatives should be sufficiently distinct to highlight the different sustainability implications between them this was a reasonable approach. We return to the spatial options later in this report as part of our assessment of the overall strategic approach to accommodating development proposed in the Plan.
25. Criticism is made of whether the analysis undertaken was fit for purpose in terms of internal consistency, the rigour of the analysis undertaken and whether it was evidentially based. However, the IIA was undertaken in

²² Protected characteristics are defined in the *Equality Act 2010* as age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion or belief; sex; and sexual orientation.

²³ Regulation 7(2).

²⁴ Regulation 12(2) of the *Environmental Assessment of Plans and Programmes Regulations 2004*.

²⁵ NLP/CD/04 & 05

²⁶ Regulation 13 of the *Environmental Assessment of Plans and Programmes Regulations 2004*.

²⁷ NLP/CD/02

support of a high level plan as a guide to policy-making and is not an end in itself. It is also to be expected that there will be differences in planning judgement or opinion. All options and policies were assessed against the same 24 objectives on a like-for-like basis to provide a guide to the Mayor about the strategy to pursue and is suitably comprehensive.

26. Nevertheless, there are anomalies in the analysis of the effect of the option involving Green Belt release and the sustainable intensification option gives little weight to the potential disbenefits that could arise. Consideration of the city region option is inevitably hampered by the extent of the Mayor's jurisdiction. However, these misgivings do not mean that the process was unsatisfactory but rather it limits the weight to be given to the IIA as evidence in support of the preferred strategy.
27. By integrating the various assessments to reduce repetition and by aggregating the findings the precise implications for equalities and health are difficult to discern. However, that does not mean that they were not present as indicated by the extensive number of guide questions that cover these areas and by the matrices that directly considered the effect on protected groups. A weakness of the IIA is that ways of monitoring likely significant effects were not obviously considered when the alternatives were being developed, refined and assessed. But that does not invalidate the IIA as a whole and following its completion numerous policies and supporting text have been adjusted to take account of its findings as minor suggested changes.

Conclusion

28. Overall we therefore conclude that the IIA meets legal and national policy requirements relating to sustainability appraisal and strategic environmental assessment.

Has the London Plan been subject to a Habitat Regulations Assessment that meets the requirements of the *Conservation of Habitats and Species Regulations 2017* and relevant national policy and guidance?

29. The Plan was subject to a Habitat Regulations Assessment during its preparation²⁸, and this was updated to respond to comments made by Natural England and to consider the minor suggested changes²⁹. Having undertaken appropriate assessments of the 7 European sites within London as well as those beyond it, the Assessment concludes that there would be no adverse effect on the integrity of them, either alone or in combination with other plans or projects. Natural England is satisfied with its findings and recommended mitigation measures have been included in the Plan. It is not expected that the mitigation strategy for Epping Forest which is being prepared will impede delivery in London but further text is suggested to cover that eventuality.

²⁸ NLP/CD/06

²⁹ NLP/CD/07

Conclusion

30. Subject to our recommendations, we are satisfied that the Plan meets the requirements of the *Conservation of Habitats and Species Regulations 2017* and relevant national policy and guidance.

Will the Plan help to advance equality of opportunity in accordance with relevant legislation and national policy?

31. The IIA incorporates an equalities impact assessment, and throughout the examination we have had due regard to the equality impacts of the Plan in accordance with the Public Sector Equality Duty ("PSED") contained in section 149 of the *Equality Act 2010*. Our detailed findings are set out in subsequent sections of this report as part of our assessment of the tests of soundness. We make recommendations where necessary to ensure that the Plan helps to advance equality of opportunity between people who share a protected characteristic as defined in the legislation and those that do not share it as well as eliminating discrimination and fostering good relations.
32. In this regard we have been informed by the detailed matrices produced as part of the IIA and which were published during the examination³⁰. There is criticism about the methodology undertaken but the baseline evidence was drawn from a wide range of sources including input following consultation. Furthermore, judgements about the likely consequences of individual policies will not necessarily be accepted by all and neither is it possible to always be emphatic about the outcome. However, our requirement to have "due regard" does not solely relate to considering the adequacy of the IIA undertaken.
33. The Mayor gives examples of 23 policies that will advance equality of opportunity for those with protected characteristics including those relating to spatial development, design, transport, social infrastructure, housing and green infrastructure and the economy. Some are directly related to particular groups such as gypsies and travellers and specialist older persons housing whilst others seek to achieve a more accessible environment for those who might not otherwise be able to travel or find it easy to access buildings and spaces. These will be of direct benefit to those with protected characteristics.
34. However, we heard much evidence about the consequences of the Plan for those with protected characteristics including the elderly, the disabled, single women (especially those with children), black and minority ethnic groups, LGBTQ+ groups and faith groups who will be affected by more general policies. This is particularly because those with protected characteristics are represented in greater numbers amongst those with limited incomes, those in social rented accommodation and those with health issues. In reaching our recommendations about all the policies we have borne in mind the likely effects, both positive and negative.
35. Whilst the PSED applies to us in exercising a public function it is done in the context of recommendations about a spatial development strategy covering a city expected to grow to 10.8 million people by 2041. Therefore, inevitably, such considerations are broad in nature as the Plan, whilst far reaching, is

³⁰ NLP/EX/17

multi-faceted and sets a framework for decision-making rather than, in many cases, dictating or determining a particular outcome. Nevertheless, as is evident from Panel Notes 7, 7.2 and 7.3³¹ requiring responses from the Mayor and allowing for further comments, we have sought to be properly informed throughout the examination. This is in order that we are as clear as possible about the likely equality implications for the 9 different protected characteristics. Our assessment of this matter has not been done as a rear-guard action but rather on a continuous basis and we have taken account of all the material before us in preparing this report and formulating our recommendations.

36. The relevant provisions of the GLA Act and the Regulations place no requirement on us to determine whether the Mayor has complied with the PSED. This is not our task and each public authority is expected to adhere to the duty, including the Mayor. That said, whether the Plan is justified includes, amongst other things, the implications for different groups in society including those with protected characteristics. In this way, such considerations are embedded within our overall assessment set out throughout this report.

Conclusion

37. For the reasons set out above and in subsequent sections of this report, when considered as a whole the Plan ensures that the disadvantages encountered by those with a relevant protected characteristic would be minimised as far as possible and their needs met in so far as they are different to those without one. Furthermore, subject to our recommendations, we are satisfied that the Plan will help to advance equality of opportunity in accordance with relevant legislation and national policy.

Does the Plan contain justified and effective policies relating to climate change that are consistent with national policy?

38. The Plan includes policies designed to contribute towards the mitigation of, or adaptation to, climate change in the United Kingdom as required by section 41(7)(c) of the GLA Act. These include policies that collectively set the overall spatial development framework that should minimise the need to travel; transport policies that should increase the proportion of trips by sustainable transport; policies relating to green infrastructure, urban greening, trees, and food growing; and policies relating to sustainable infrastructure including minimising greenhouse gas emissions, energy infrastructure, managing heat risk, water infrastructure, reducing waste and supporting the circular economy, flood risk management, and sustainable drainage.
39. Subject to our recommendations where relevant, such policies are consistent with the NPPF and will help London to adapt to climate change and move towards becoming a zero carbon city.

³¹ NLP/EX/15a, 27 and 34a

Conclusion

40. We therefore conclude that, subject to our recommendations set out throughout this report, the Plan contains justified and effective policies relating to climate change in accordance with the legislation.

Does the Plan represent a spatial development strategy in accordance with relevant legislation and national policy?

The form and general nature of the Plan

41. The Plan comprises around 500 pages and contains over 110 policies, some of which are more than two pages in length. It is clear from many of the representations made about the Plan, and the discussions that took place throughout the examination, that its length and complexity raise a number of significant issues about the fundamental role and purpose of a spatial development strategy in a three tiered plan-led system³². These include the ability of a wide range of people and organisations to engage effectively in its preparation; the nature and length of the consultation and examination processes; its ability to clearly set out a long term strategy for the amount, type and broad locations of development and infrastructure needed across London; its role in relation to local plans, neighbourhood plans and development management; its usefulness for those involved in bringing forward development projects; and the ability to effectively monitor whether its strategic objectives are being achieved.
42. That said, there is nothing in the relevant legislation or NPPF and associated guidance that rule out a spatial development strategy taking the form of this Plan. Furthermore, previous versions of the London Plan prepared by the Mayor's predecessors, whilst not quite as long or detailed in some respects, were themselves substantial, complex documents. The Mayor is clear that the scope, format and content of the Plan were all carefully considered and determined in order to effectively deliver his vision and objectives. We consider now whether that view is justified in the context of the relevant legislation and four tests of soundness.

Matters of strategic importance to Greater London

43. The Plan is required to deal only with matters which are of strategic importance to Greater London³³. These are not defined in the legislation, and it is likely that they will change significantly over time. The Mayor, as the elected body with lead responsibility for the Plan, has discretion in defining what he considers to be the relevant strategic matters for the particular plan period. However, this needs to be based on evidence, take account of views expressed by others during the preparation of the Plan, and have regard to relevant national policy and guidance.
44. The 2012 NPPF does not define matters of strategic importance, nor does it refer to spatial development strategies. However, the list of strategic priorities

³² The Spatial Development Strategy (London Plan), local plans and neighbourhood plans.

³³ GLA Act section 334(5).

that local plans are expected to address³⁴ is of some relevance, as is national guidance on local plan policies, strategic matters and how a strategic policy should be determined³⁵. Furthermore, whilst not directly applicable to the preparation of a spatial development strategy, section 33A(4) of the 2004 Act defines a strategic matter as sustainable development or use of land, particularly in connection with infrastructure, that has or would have a significant impact on at least two planning areas³⁶. The various categories of planning application that are deemed to be of potential strategic importance to London as defined in the *Town and Country Planning (Mayor of London) Order 2008* are also relevant to consider.

45. In that context, we broadly accept the Mayor's three main reasons for considering matters to be of strategic importance to Greater London. The first is to deal with development or infrastructure whose scale, nature or location means that it would be of significance to at least two local planning authority areas. The second, which reflects a legal requirement, is to deal with the general spatial development aspects of the Mayor's other strategies, policies or proposals³⁷. The third is to provide leadership, ensure consistency of approach and facilitate effective partnership working that the Mayor considers necessary to deliver the Plan's objectives.
46. We are, therefore, generally satisfied that the matters that the Plan deals with are of strategic importance to Greater London. However, it is the application of the third of the Mayor's reasons that we think needs greatest scrutiny in terms of the resultant level of detail and prescription set out in many of the policies in the Plan. We will, therefore, consider carefully those policies, including whether the detailed standards or other requirements are essential to achieve the Mayor's vision and objectives³⁸, or whether there are other effective means of so doing that could be legitimately determined by individual local planning authorities.

Relationship with local plans³⁹ and neighbourhood plans

47. The statutory development plan for any particular part of London comprises the London Plan and any adopted local plans and made neighbourhood plans that relate to that geographical area.
48. Local plans in London are required to be in general conformity with the London Plan⁴⁰. Neighbourhood plans are required to be in general conformity with strategic policies contained in the development plan for the area; this includes strategic policies in the London Plan (as well as any strategic policies in local plans). The Mayor's representatives confirmed during the examination that they consider all policies in the London Plan to be strategic, and as the Plan is

³⁴ NPPF paragraph 156.

³⁵ PPG ID-9-013-2014, ID-12-010-2014, and ID-41-076-2014.

³⁶ Section 33A(4) relates to the duty to cooperate which, for the reasons set out earlier, we do not consider applies to the preparation of the London Plan.

³⁷ GLA Act section 334(4).

³⁸ PPG ID-41-076-2014.

³⁹ "Local plan" is used throughout this report to refer to any development plan document adopted under the 2004 Act and also plans prepared by the Lee Valley Regional Park Authority under the Lee Valley Regional Park Act 1966 (as amended).

⁴⁰ Section 24(b) of the 2004 Act.

required to deal only with matters of strategic importance to London this is a reasonable interpretation.

49. The Plan therefore needs to be clear about what it expects local plans and neighbourhood plans to contain, both in terms of general coverage and content but also specific policies and proposals, so that the bodies preparing those plans are clear about how to achieve general conformity. Furthermore, the relative roles of the Plan, local plans and neighbourhood plans need to be clear to avoid unnecessary duplication of, or contradiction between, policies in different parts of the development plan. The three-tier system needs to be kept as simple as possible to avoid creating unnecessary burdens for those preparing development proposals and to ensure expedient, consistent decision making.
50. Paragraphs 0.0.21 to 0.0.23 in the introduction to the Plan aim to provide clarity in those respects. The text was subject to significant redrafting through the Mayor's suggested changes published in August 2018, and he suggested further changes during the examination. Key points are:
 - There is no need for local or neighbourhood plans to repeat London Plan policies where they provide sufficient and appropriate detail such that they can be effectively implemented at the local or neighbourhood level.
 - Some London Plan policies specifically require local or neighbourhood plans to provide further detail or geographic specificity, for example through setting out detailed policy requirements relevant to the local area, allocating specific sites or setting boundaries.
 - Local plans and neighbourhood plans may include policies that vary from the detail of the policies in London Plan where locally-specific circumstances and evidence suggests this would better achieve "Good Growth" objectives (which we consider below) and where such an approach can be considered to be in general conformity.
51. This fundamental approach has the benefit of allowing boroughs and neighbourhood forums to focus their resources on local priorities, without having to repeat work that has been done to inform the London Plan. As well as using resources efficiently, this provides clarity to those preparing development proposals through a broadly consistent approach across London. It also allows the Plan's policies to be applied immediately, without having to wait for them to be taken forward through local or neighbourhood plans.
52. On the other hand, there is the danger that the approach taken removes the discretion for boroughs and neighbourhood forums to develop policies to suit their own preferences and local circumstances. The *London Planning Statement Supplementary Planning Guidance* indicates that the content of the London Plan should not include details more appropriate for local or neighbourhood plans. There is clearly a balance to be struck between allowing for autonomy whilst at the same time setting a strategic direction. The Plan's policy requirements should therefore be restricted to those that are essential to achieving the Mayor's strategic vision and objectives.

Development management

53. London boroughs are responsible for determining most planning applications, but must refer to the Mayor those that are of potential strategic importance to Greater London⁴¹. As part of the statutory development plan, the Plan must be taken into account in the determination of planning applications in London. Whilst national policy indicates that local plan policies should provide a clear indication of how a decision maker should react to a development proposal⁴², this particular requirement does not strictly apply to spatial development strategies. That said, to be effective, the Plan's policies must be clear about how, if at all, they are intended to be applied in the development management process.

Consistency with national policy and guidance

54. The relevant legal requirement is to "have regard to" the need to ensure consistency with national policy⁴³, and that objective is one of the four tests of soundness. Thus, whilst there is no absolute requirement for all parts of the Plan to be entirely consistent with national policy, there needs to be clear, evidence-based justification for any divergence. Furthermore, we consider that the strength of the justification should be proportionate to the degree of divergence and the significance of the policy in question.

Structure, nature and content of the Plan's policies

55. In light of what we say above, it is important that each policy is clear about how, if at all, it is intended to be taken into account in the preparation of local plans and neighbourhood plans and in the development management process, including by the Mayor, local planning authorities, neighbourhood forums and those involved in preparing planning applications.
56. The Plan is required to set out the Mayor's policies relating to the development and use of land⁴⁴, but it is not limited to that. As the Plan must deal with the general spatial development aspects of his other strategies, policies and proposals, it may also be appropriate for it to set out what the Mayor will do outside the statutory planning system. There may also be policies that relate to spatial development that require implementation by bodies other than the Mayor and local planning authorities.
57. The structure, nature and content of the policies varies somewhat through the Plan. To a large extent this reflects the particular type of development dealt with and the proposed implementation mechanisms. Provided that each policy is clear about what it is intending to achieve and how it will be effectively implemented, then there is no need to attempt to impose a greater degree of consistency in terms of their structure.
58. Through representations and at hearing sessions many participants have suggested ways in which policies could be improved or strengthened often by

⁴¹ Town and Country Planning (Mayor of London) Order 2008.

⁴² NPPF paragraph 154.

⁴³ GLA Act section 41.

⁴⁴ Section 334(3) of the GLA Act.

putting forward specific wording. These will all have been considered by the Mayor and changes to the Plan suggested to take account of them where he deemed necessary⁴⁵. In applying the tests of soundness we have taken the original Plan including the minor suggested changes as the starting point. Other than endorsing the Mayor's further suggested changes, we have only recommended modifications where they are required to meet the soundness tests rather than simply because a policy could be improved or where a particular form of words would be preferable.

59. The individual policies do not include extensive cross-referencing to other relevant provisions. That is because the Plan should be read as a whole. Indeed, to include cross-referencing as a principle of policy formulation would make it cumbersome and even more lengthy as well as running the risk that some links were omitted. Therefore we support the approach taken in this respect.

Conclusion

60. Our findings set out above about matters of strategic importance; the relationship with local plans, neighbourhood plans and development management; consistency with national policy; and the structure, nature and content of policies will inform our consideration of other matters as relevant throughout the remainder of this report. Given the discretion that the legislation and guidance give to the Mayor, our recommendations do not attempt to fundamentally change the form, scope and nature of the Plan. However, for the reasons set out above, we would encourage the Mayor to consider setting out a more concise spatial development strategy, focussed on strategic outcomes rather than detailed means of implementation, when the Plan is next replaced.
61. Subject to our recommendations, we are satisfied that the Plan represents a spatial development strategy that accords with relevant legislation and national policy.

Assessment of Soundness

Background

62. The following sections of the report set out our assessment of the Plan against the tests of soundness and, where necessary, how it could be changed to ensure that these are met. It is structured using headings that are based on the matters that we considered at the examination, although we have made certain changes to those in the interests of brevity and clarity. Under these headings our report deals with the tests of soundness, rather than responding to individual representations.

Does the Plan set out a clear vision and objectives that are consistent with national policy and/or justified and which help to provide an effective strategic framework to achieve sustainable development?

63. In October 2016, the Mayor published *A City for All Londoners* which set the context for all of his strategies, including the new London Plan. The Mayor's

⁴⁵ Pursuant to powers in section 337(2) of the GLA Act.

foreword to the Plan makes it clear that it aims to set out a new and ambitious approach to deal with high levels of population growth, and unprecedented challenges in terms of pressure on land, housing, infrastructure and the environment, over the next 20 years or so.

64. There are many ways in which a strategic plan could be presented, including in terms of how it describes what it is aiming to achieve and how that is intended to be realised. National policy and guidance are of some relevance, but there is no prescribed format or single approach. Whilst previous versions of the London Plan may have included a succinct vision and associated objectives, the new Plan, deliberately⁴⁶ adopts a different approach.
65. That new approach is encapsulated in the phrase “Good Growth” which is intended to be a concept that underpins the whole Plan. During the examination, the Mayor suggested the addition of a paragraph at the start of chapter 1 which states that Good Growth is growth that is “socially and economically inclusive and environmentally sustainable”. We consider that to be a helpful clarification and succinct summary of the concept. The Mayor’s vision is elaborated on in subsequent paragraphs 1.0.1 to 1.0.10 as well as in the Plan’s foreword and introduction. Those parts of the Plan are well written and together clearly set out the key challenges relating to the development and use of land in London as well as how they should be tackled to achieve the Mayor’s vision. It is not necessary to modify those parts of the Plan beyond the changes suggested by the Mayor in order to make it effective.
66. Chapter 1 of the Plan goes on to set out six Good Growth “policies”, that cover the key themes in the Mayor’s vision: building strong and inclusive communities; making the best use of land; creating a healthy city; delivering the homes Londoners need; growing a good economy; and increasing efficiency and resilience. These are intended to inform the policies that are then set out in subsequent chapters of the Plan. Those themes are justified as they clearly relate back to the Mayor’s vision, are based on evidence, and are relevant to the purposes of a spatial development strategy. Furthermore, they have a good deal of support amongst the many people and organisations who made representations about the Plan, albeit some suggest changes to the detailed wording. The Mayor has suggested a number of further changes to GG1 to GG6 to take account of representations, including to set out the importance of encouraging early and inclusive engagements with local communities and other stakeholders in the formulation of development proposals, policies and area based strategies. We agree that subject to the Mayor’s suggested changes, GG1 to GG6 cover an appropriate range of social, economic and environmental matters in a way that is consistent with national policy and justified.
67. However, presenting GG1 to GG6 as “policies” introduces additional complexity in terms of how the Plan as a whole is intended to inform decisions about the content of development plan documents, neighbourhood plans, and individual development proposals. Presenting GG1 to GG6 as “objectives” rather than “policies” would better reflect their nature and content, and remove any ambiguities, repetition or potential inconsistencies that could arise from having to apply both GG policies and subsequent topic based policies to decision

⁴⁶ GLA oral evidence on 16 January 2019.

making. This would ensure that the Plan is effective, and we recommend accordingly [**PR3**].

68. We deal with whether policies in subsequent chapters of the Plan are consistent with GG1 to GG6 throughout the rest of this report and it is not necessary to repeat our findings here. It is relevant to note, however, that we do not consider it necessary for the subsequent chapters of the Plan, or individual policies within them, to explicitly refer back to GG1 to GG6. To do so would add to the complexity and length of the document, and such cross referencing would never be comprehensive. Paragraphs 1.0.9 and 1.0.10 clearly explain the relationship between GG1 to GG6 and subsequent policies, so other than to reflect our recommendation above about expressing them as objectives, no further changes are needed to the Plan in that regard.
69. The Plan is required by legislation and national policy⁴⁷ to contribute to the achievement of sustainable development. It is clear from numerous references in the Plan that it aims to do that, including through the underpinning concept of Good Growth which the Mayor's suggested change to paragraph 1.0.1A makes clear is the way in which sustainable development is to be achieved in London. The Plan's glossary includes a definition of sustainable development which is intended to capture the essence of the concept as defined in the NPPF. However, such a summary has the potential of being interpreted differently to the NPPF, and is unnecessary in the context of chapter 1 of the Plan. We therefore recommend that the definition of sustainable development be deleted from the glossary [**PR55**].

Conclusion

70. We therefore conclude that, subject to our recommendations, the Plan sets out a clear vision and objectives that are consistent with national policy and justified. Furthermore, the vision and objectives will help to provide an effective strategic framework and achieve sustainable development.

Is the Plan aspirational but realistic, having regard to the resources that are available for implementation and the cumulative cost of policy requirements?⁴⁸

71. We have already described how the Plan aims to set out a new and ambitious approach, and concluded that its Good Growth objectives are justified. We turn now to consider whether that new approach is likely to be realised.
72. The Plan is supported by substantial evidence about the wide range of infrastructure needed to support development and growth over the coming decades, including the *London Infrastructure Plan 2050* and *Update Report*⁴⁹. Whilst inevitably estimates over the long term can only be indicative, this suggests infrastructure investment may need to be in the range of £1 trillion to £1.7 trillion between 2016 and 2050. Under a "business as usual" scenario there would be a funding gap of around £3.1 billion per year.

⁴⁷ GLA Act section 41(7)(b) and NPPF paragraph 6.

⁴⁸ NPPF paragraphs 154, 173 and 174, and GLA Act section 41(5)(c).

⁴⁹ NLP/EC/020 (July 2014) and NLP/EC/020a (March 2015).

73. The Plan assumes, therefore, that significant investment will be required by the public and private sectors. It was confirmed at the hearing sessions that, compared to the past, greater contributions from both are expected in order to deliver infrastructure but also to ensure that the design and quality of development will achieve Good Growth.

Funding infrastructure

74. Whilst the identified funding gap is substantial, it is equivalent to 0.9% of London's Gross Value Added ("GVA") which is in line with the Government's fiscal remit for National Infrastructure Commission recommendations. In that context, whilst securing the necessary funding may at this stage be an aspiration, it need not be considered unrealistic.
75. Paragraphs 11.1.14 to 11.1.57 in the Plan summarise how key types of infrastructure are expected to be funded and delivered, and a further suggested change ensures that flood risk management infrastructure is covered. This is based on evidence and liaison with key stakeholders, and we are not aware of any significant outstanding concerns amongst those responsible for delivery of the infrastructure.
76. Paragraphs 11.1.58 to 11.1.65 set out potential new ways of raising additional funding including fiscal devolution and sharing in land value uplift. Whilst there is no certainty that these will materialise, they provide an appropriate part of the reasoned justification as they describe potential means of securing additional funding for infrastructure which are supported by the Mayor.

Economic viability of development

77. The Plan is supported by a viability assessment carried out during its preparation and supplemented by further work undertaken in response to issues raised during public consultation ("LPVS")⁵⁰. The methodology is broadly consistent with relevant national guidance extant at the time⁵¹. Over 40 different development typologies were assessed using evidence-based estimates of development costs and values, and taking account of relevant policy requirements and different residential and commercial value areas. Residual land values for the different typologies were compared with high, medium and low benchmark land values, which were based on over 60 relevant case studies. Sensitivity tests were applied to the development typologies shown to be least viable.
78. The LPVS indicates that most development is likely to be viable whilst meeting all of the Plan's policy requirements. The main exceptions were certain forms of development in lower value parts of London, including higher density residential, many small sites and most mixed use typologies, and specialist housing for the elderly. However, the fact that some forms of development may not be viable in some areas does not in itself mean that implementation of the Plan would be at serious risk. Furthermore, within the broadly defined lower value areas identified in the LPVS there are pockets of higher value where viability will be stronger; these are likely to include the most accessible

⁵⁰ *London Plan Viability Study and Technical Report*, December 2017 [NLP/VI/01 and NLP/VI/02] and *Addendum*, November 2018 [NLP/VI/004].

⁵¹ PPG ID-10 March 2014.

locations, such as in and around town centres, where the Plan aims to focus development.

79. Varying the assumptions used in the LPVS would of course lead to different results. Some sensitivity tests carried out by the Mayor show viability improvements. On the other hand, alternative assumptions put forward by representors about affordable housing values, finance costs, residential values, build costs, developer profits and benchmark land values indicate that less than a quarter of the residential scenarios tested would be viable with 50% affordable housing provision⁵².
80. We have considered carefully the LPVS, including the evidence behind its assumptions and the criticisms of it, and alternative suggestions put forward by many representors. We are satisfied that, in most respects, the LPVS represents proportionate evidence such that it provides a broad understanding of viability at a strategic level⁵³. The main shortcomings relate to the limited typologies for certain uses, including specialist housing for the elderly and purpose built student accommodation, and the assumptions about the redevelopment of sites with currently operating supermarkets.
81. Those shortcomings mean that we are not persuaded that the LPVS demonstrates that those forms of development would be viable if they are required to meet all of the policy requirements in the Plan. Whilst mixed use redevelopment of some commercial sites would make efficient use of land and deliver additional homes, it is not of strategic importance or critical to meeting identified housing or other development needs. However, the provision of specialist housing for the elderly and purpose built student accommodation are both important to meeting identified needs. We deal with the implications of that in later sections of this report.
82. The LPVS development typologies for office, commercial and mixed use developments may not be fully representative of schemes in the Central Activities Zone ("CAZ"). However, the cost of the Plan's policy requirements is likely to represent a small proportion of the total value of such schemes and we are not persuaded that they are likely to have a significant impact on viability in the CAZ or other town centres.
83. We take account of the findings of the LPVS, and other evidence, about the viability of small site development in the lowest value areas, particularly parts of outer London, in our assessment of the Plan's housing targets set out later in the report.

Policy DF1: Delivery of the plan and planning obligations

84. Whilst the LPVS is proportionate evidence for the Plan, local plans in London will also be subject to viability testing. Furthermore, both local plans and development proposals will be prepared in the context of current national policy and guidance about viability⁵⁴. Proportionate viability assessments at local plan level will almost certainly need to go into considerably more detail than the LPVS, including where necessary about key sites, taking account of

⁵² Appendix 1 - London First – Response to the Viability Study Technical Report, March 2018.

⁵³ PPG ID-10-005-20140306.

⁵⁴ NPPF 2019 and PPG ID-10 May 2019

locally specific evidence. The Plan needs to reflect this fact, and the inevitable limitations of a strategic-level viability assessment.

85. In many respects, policy DF1 is consistent with the 2014 guidance which advises that decision-taking on individual applications does not normally require consideration of viability⁵⁵. This principle is developed further in current guidance⁵⁶, which places greater emphasis on testing viability at the plan-making stage. Specifically, it advises that where up to date policies have set out the contributions expected from development, planning applications that fully comply with them should be assumed to be viable and that it is up to the applicant to demonstrate whether particular circumstances justify the need for a viability assessment at the application stage. If that is the case, any viability assessment accompanying a planning application should refer back to the assessment that informed the plan with evidence of what has changed since then⁵⁷.
86. To be effective in London, the approach to viability at the planning application stage set out in current national policy and guidance will require consideration of the viability evidence supporting both the London Plan but also the relevant local plan. In other words, it is only where there is an up to date local plan in place supported by appropriate viability evidence, that we would expect full weight to be given to the assumption that planning applications that fully comply with all relevant development plan policies are viable.
87. Policy DF1, and the reasoned justification, need to be modified to properly reflect this and ensure that it is consistent with national policy and effective. Specifically, the requirements relating to site-specific viability assessments in parts A and B should be modified to make it clear that they only apply if relevant policies in the local plan are up to date. The reasoned justification needs to be modified to make it clear that the Plan has been subject to a viability assessment that is proportionate to a spatial development strategy; to clarify that more detailed assessments will need to be undertaken to inform local plans; and to explain that the requirements in policy DF1 relating to site specific assessments apply where relevant policies in local development plan documents are up to date [**PR54**]. Part C does not need to be modified as it is appropriate for boroughs to determine the weight to be given to site-specific viability assessments in all circumstances.
88. Subject to the above modifications, and others set out elsewhere in this report, we are satisfied that the cumulative cost of the policy requirements set out in the Plan, along with other national and local requirements, would not threaten the economic viability of development and put implementation of the Plan at serious risk.
89. Part A of policy DF1 requires development proposals to provide the infrastructure and meet other relevant policy requirements necessary to ensure that they are sustainable. For the purposes of both local plan preparation and development proposals that cannot viably meet all requirements, part D prioritises affordable housing and public transport improvements, then health and education provision, affordable workspace,

⁵⁵ PPG ID-10-016-20140306.

⁵⁶ PPG ID-10 May 2019.

⁵⁷ PPG ID-10-007 and 008-20190509.

and culture and leisure facilities. This provides an appropriate strategic framework that is consistent with the Plan's overall aims within the context of a plan-led system that also involves weighing up all material considerations when determining planning applications.

Consequences if resources are not available and policy requirements are not met

90. We have already concluded that the Plan is based on aspirational but realistic assumptions about funding. Subject to our recommendations, we therefore expect the policies in the Plan to be effective meaning that they should deliver their intended outcomes and positive progress should be made towards Good Growth objectives. However, if resources are not made available to close the funding gap, it is likely that development needs will not be met, at least not in ways that achieve Good Growth. That would have negative implications for all those living and working in London, but particularly so for those with lower incomes or with protected characteristics.
91. We endorse elsewhere in this report the Mayor's suggested changes to the monitoring framework. Those that relate to Good Growth objectives and outcomes in specific locations including Opportunity Areas and Strategic Regeneration Areas are particularly important in the context of the need for significant contributions from both the private and public sectors if the policies are to be successful.

Conclusion

92. Subject to our recommendations, we therefore conclude that the Plan is aspirational but realistic, having regard to the resources that are available for implementation and the cumulative cost of policy requirements.

Is the overall strategic approach to accommodating development in London justified and would it be effective in helping to achieve sustainable development?

Should the vast majority of London's development needs be met within London?

93. The Inspector's report into the FALP published in November 2014 identified significant and potentially serious implications for delivery and for existing communities of a strategy based on seeking to meet needs wholly within London. As a result, the report recommended that the then Mayor explore alternative options to inform an immediate review of the FALP in 2015, including growth in the wider South East⁵⁸ through engagement with local planning authorities outside London.
94. Preparatory work for a new London Plan started in 2015 including through three workstreams undertaken by the Outer London Commission (OLC) relating to potential spatial options for accommodating demographic and economic growth; barriers to housing delivery; and collaboration with the wider South East. The OLC reports relating to those workstreams were published in March 2016⁵⁹. In developing a new London Plan, the OLC

⁵⁸ "Wider South East" is defined in the Plan as the East of England, South East of England and London taken together, and we use the term accordingly throughout this report.

⁵⁹ NLP/PP/01; NLP/HOU/05; and NLP/PP/02.

suggested that the Mayor adopt a threefold approach to accommodate growth through greater efficiencies in using existing capacity; sustainable intensification of selected parts of the city; and partnership working to realise the potential of the wider metropolitan region.

95. Following his election in May 2016, the current Mayor decided to review all of the existing strategies and, as noted above, published and consulted upon his overall vision in *A City for All Londoners* later that year. Subsequent to that, the IIA scoping report to inform the new London Plan was published in February 2017⁶⁰. This set out three high level strategic options to deliver the Mayor's vision based on the FALP examination and OLC recommendations.
96. The draft new Plan was prepared in 2017 informed by extensive evidence and analysis, as documented in the examination library, and the ongoing IIA process which led to the refinement of the three spatial options identified earlier into five: existing London Plan; existing Plan with selective Green Belt review; existing Plan and city region approach; polycentric approach; and sustainable intensification.
97. Towards the end of 2017, the Mayor's evidence about the need for housing, economic and other forms of development, and the potential physical capacity of different parts of London, indicated to him that the vast majority, if not all, of those needs could be accommodated within London through the sustainable intensification option. We consider whether the evidence about need and capacity (including the assumptions about the provision of new homes on small sites in existing residential areas) along with the numerous policies intended to achieve sustainable intensification through Good Growth, justifies that approach in later sections of this report.
98. However, based on the Mayor's assessment it is understandable, and consistent with national policy, that his draft Plan published in December 2017 took forward that preferred approach rather than seek to reach agreement with partners in the wider South East for a strategy that assumed that some of London's development needs could be met in the surrounding area. That said, we consider later in this report whether the housing, industrial and other development needs can be met within London in the manner proposed in the Plan, including without encroaching into the Green Belt.

Is the broad spatial distribution of housing and employment development proposed in the Plan, including between inner and outer London, justified?

99. The Plan focuses development on the Central Activities Zone ("CAZ"), town centres across London, approximately 50 Opportunity Areas, and the intensification of existing built up areas in inner and outer London⁶¹. The broad spatial pattern of development that the strategy proposes can be illustrated in a number of ways including⁶²:
 - 29,000 new homes and 19,000 new jobs per year in inner London.
 - 36,000 new homes and 6,000 new jobs per year in outer London.

⁶⁰ NLP/CD/02.

⁶¹ Annex 2 in the Plan includes a map and a table defining which boroughs make up inner and outer London and which contain part of the CAZ.

⁶² Rounded figures based on Table 6.1 in the Plan and the Mayor's response to supplementary question 19 [NLP/EX/13].

- Increase of 20% to the existing housing stock in inner London by 2029.
- Increase of 18% to the existing housing stock in outer London by 2029.

100. This strategic focus and broad spatial distribution are driven by a number of factors notably population and economic growth pressures, market demand, public transport accessibility, the availability of brownfield land, regeneration needs, and national planning policy⁶³. The Mayor's transport modelling indicates that the strategy could lead to an increase of 70% in the number of jobs accessible within 45 minutes by public transport. Furthermore, as discussed later in this report, the Plan is expected to help increase the proportion of trips in London being made by foot, cycle or public transport from 63% in 2015 to 80% by 2041. In terms of transport and travel, therefore, the spatial strategy is broadly consistent with national policy which seeks to manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable.

101. However, there are, of course, potentially harmful impacts of accommodating the amount of development and associated activity within the existing urban fabric of a large city if it is not carefully planned and managed. Continued high levels of growth in the CAZ and some town centres could lead to increased congestion, worsening air quality, and displacement of lower income households and lower value businesses and services due to continuing high rises in property prices and rents. The scale and nature of change in some opportunity and regeneration areas could similarly lead to the displacement of existing communities and businesses and new developments that fail to successfully integrate into their surroundings or create a new positive sense of place. Whilst the Plan describes the proposed increase in new homes in suburban and other residential areas in many outer boroughs as incremental, there is a risk that it could significantly harm the character of parts of those places and result in an increase in the amount of commuting by car.

102. It is clear that these risks are recognised by the Mayor, and that is the reason why the Plan aims to set out a "new and ambitious" approach compared to previous strategies. We consider whether the numerous policies in the Plan are justified and would be effective in mitigating the potential harmful effects of the scale of development proposed and delivering Good Growth as envisaged by the Mayor.

Conclusion

103. For the reasons set out above, we understand the Mayor's rationale for seeking to accommodate all of London's development needs within London, and agree that the broad spatial distribution of development proposed in the Plan is justified. However, we return later in this report to matters concerned with whether the scale of housing and industrial development required could actually be accommodated in the manner proposed.

⁶³ GLA oral evidence relating to matter 12 on 22 January 2019.

Is the approach to planning development and infrastructure in the wider South East and beyond set out in policies SD2 and SD3 consistent with national policy, and would it be effective in helping to achieve sustainable development?

104. The statutory role of the Plan is to set out the Mayor's strategy for spatial development and general policies in respect of the development and use of land in Greater London⁶⁴. Thus whilst the Plan should have regard to the wider geographical context, its role in referring to development and use of land outside London should necessarily be limited.
105. As already discussed, the Plan is based on the premise that the vast majority of London's development needs can be met in the city. However, the inextricable functional relationships with the wider South East (including in terms of migration, commuting, shopping and leisure trips, transport infrastructure, supply chains, freight and logistics, waste management, climate change, and green infrastructure) are recognised. Because of these cross boundary strategic matters, and also because the Plan does include some policies that have implications for development and infrastructure beyond the boundaries of London, the Plan contains two policies relating to the wider South East.

Policy SD2: Collaboration in the Wider South East

106. Policy SD2 essentially sets out the Mayor's general commitments, intentions and principles for working with partners across the wider South East. It includes reference to "recently-developed strategic coordination arrangements", although it does not specify what these are. Supporting evidence from the Mayor and others provides information about an annual summit and numerous meetings and working groups involving both elected politicians and officers from local authorities and representatives from other bodies. The reasoned justification advises that the arrangements are facilitated by the Mayor, London Councils, South East England Councils and the East of England Local Government Association. Furthermore, it clarifies that the arrangements are non-statutory and intended to complement the Mayor's duties under the GLA Act to inform and consult with county and district authorities adjoining and in the vicinity of London⁶⁵. Reference is also made to the Mayor's role as a duty to cooperate body in relation to local plans prepared by authorities outside London on relevant matters of strategic importance.
107. The intention is that the policy will inform the way in which the Mayor will implement certain policies in the Plan that could have implications for areas outside London (which we consider later in this report); guide his input to local plans for areas outside London; gather, analyse and share evidence about demographic, economic, environmental and transport issues facing the wider South East; and "find solutions to shared strategic concerns" that achieve "mutual benefits".
108. It was clarified by representatives of the Mayor during the examination that policy SD2 is intended to set out a long term non-statutory collaborative way

⁶⁴ GLA Act sections 334(2) and (3).

⁶⁵ GLA Act sections 335, 339 and 348.

of working that would also be used to inform future reviews of the Plan and the Mayor's input to reviews of plans outside London. It was also stated that the approach would be likely to evolve over time and could, for example, involve the pooling of resources for shared research and the use of new tools such as statements of common ground⁶⁶.

109. We have already concluded that the preparation of the London Plan by the Mayor is not subject to the duty to cooperate under section 33A of the 2004 Act. However, national policy and guidance is clear that effective cooperation between the Mayor, boroughs and local planning authorities bordering London will be vital to ensure that important strategic issues are planned effectively⁶⁷. In the absence of any clear legal framework or nationally prescribed formal mechanisms, the approach set out in policy SD2 is a reasonable and justified response to that policy expectation and the recognition by the Mayor and partners in the wider South East of the need to work together.
110. That said, establishing and starting to implement the new informal structures has taken a number of years, and as representatives of the Mayor advised more than once during the examination establishing good working relationships takes time. Whilst many meetings have been held, there have been limited tangible outputs for example in terms of identifying and agreeing "mutual benefits" or "willing partners". Only recently has agreement been reached in principle to share resources for evidence gathering and analysis, and there is no commitment to establish a technical secretariat as called for by the Assembly and others.
111. If London cannot accommodate all of its development needs, the most significant strategic issue facing the wider South East for the coming decades will be how and where to accommodate that growth outside London in a way that will contribute towards achieving sustainable development. Many representors, with a wide variety of interests, have argued that this could and should be achieved. However, it is clear from past experience and evidence about increasing development pressures that areas in the wider South East outside London already face, that there are no easy solutions or clearly identified potential growth locations. Furthermore, it is apparent from the representatives from the South East England Councils, East of England Local Government Association and individual local authorities outside London that there is limited appetite to consider the possibility of accommodating significant amounts of additional development associated with the growth of London.

Policy SD3: Growth Locations in the Wider South East

112. Policy SD3 states that the Mayor will work with authorities, Government and other interested parties to realise the growth potential of the wider South East and beyond through investment in strategic infrastructure to support housing and business development in particular growth locations to meet need and secure mutual benefits for London and relevant partners. In essence therefore, like policy SD2, it sets out a commitment, purpose and statement of intent that will inform the way in which the Mayor intends to work with

⁶⁶ GLA oral evidence at the matter 16 hearing session on 25 January 2019.

⁶⁷ NPPF paragraphs 178-181 and PPG ID-9-007-2014.

partners in the wider South East. Its intention, quite rightly, is not to identify growth locations outside London.

113. However, the inclusion of Figure 2.15 in this section of the Plan has the potential to cause some confusion in this regard. Whilst entitled “Wider South East – 13 Initial Strategic Infrastructure Priorities”, paragraph 2.3.8A refers to eight of these being radial priorities that connect to growth corridors in London. The Mayor has suggested the last sentence of that paragraph, which referred to some of the orbital routes having more capacity to accommodate additional growth than the radial ones, be deleted. This would be an improvement, but we remain concerned that as policy SD3 clearly links growth to strategic infrastructure, the inclusion of Figure 2.15 in this part of the Plan is likely to lead some to (wrongly) interpret it as identifying potential locations in the wider South East for accommodating development needs associated with London.

114. We therefore recommend that Figure 2.15 and associated text be moved to the transport chapter with further clarification about their status and purpose, including how they relate to the transport schemes listed in Table 10.1 [PR4].

Conclusion on development in the wider South East and beyond

115. The arrangements set out in policy SD2 and SD3, provided that they continue to evolve, may well be effective in tackling the relatively modest challenges of helping to implement certain policies in the Plan, discharging the Mayor’s duties to inform and consult, responding to duty to cooperate requests from local authorities outside London, and coordinating and sharing evidence and monitoring. However, we are not convinced that they represent a political and administrative structure that would be capable of resolving more fundamental and challenging issues about how high levels of growth and development could be planned and accommodated in a coordinated way across London and the rest of the wider South East.

116. That said, it is beyond our remit to make recommendations about whether or how a more effective system of strategic planning for the wider South East should be introduced.

117. Overall, we conclude that, subject to our recommendations, the approach to development in the wider South East and beyond is justified and consistent with national policy, and that it should be effective in helping to implement the Plan and to inform future reviews.

Would policies SD1 and SD10 be effective in helping to deliver development and regeneration in Opportunity Areas and Regeneration Areas in ways that are consistent with national policy and the Plan’s Good Growth objectives?

Opportunity Areas

118. The Plan identifies a total of 47 Opportunity Areas within central London and six growth corridors: Crossrail (Elizabeth Line); Crossrail 2; London Trams; Bakerloo Line extension; Thameslink/HS2; and Thames Gateway. Each Opportunity Area is expected to have capacity for at least 5,000 net additional

jobs and at least 2,500 net additional homes linked to recent or potential improvements in public transport connectivity and capacity. In some, infrastructure is already operational or under construction and development well underway, whilst at the other end of the spectrum are some that are not expected to reach maturity for at least 10 to 15 years. Clearly the provision of transport, social, green and other infrastructure will be critical to ensure that Good Growth is achieved in Opportunity Areas. For the reasons set out earlier in this report, we are satisfied that the Plan makes justified assumptions about the availability of resources, and contains effective policies to coordinate the provision of infrastructure and development.

119. Development in Opportunity Areas is expected to make a significant contribution in terms of accommodating new jobs and meeting the ten year housing targets with over 275,000 net additional homes being provided within them collectively between 2019 and 2029. However, to ensure that targets for jobs and homes in some Opportunity Areas, particularly those that are “nascent” or “ready to grow”, are not unrealistically high and thereby lead to unsustainable forms of development, the Mayor has suggested changes to policy SD1 parts B(4) and B(6) and reasoned justification. These make it clear that boroughs should establish the capacity for growth in each Opportunity Area, and that the figures in Table 10.1 are purely indicative rather than minimum targets. Other policies in the Plan set out the assessment process to deliver good design and optimise density; the effective application of those policies will clearly be important in Opportunity Areas.
120. The Mayor has also suggested changes to policy SD1 part B(9) to strengthen the requirement for public and stakeholder engagement and collaboration in the preparation of Opportunity Area Planning Frameworks. This should help to ensure that the views of existing residents and businesses are properly taken into account and ultimately improve the quality of schemes in terms of meeting local needs. This is particularly important, as not all planning frameworks will be progressed through local plans but rather some through less formal means including the Mayor’s supplementary planning guidance (“SPG”) and boroughs’ supplementary planning documents (“SPD”).
121. Opportunity Areas are likely to contain significant amounts of contaminated land, often straddling borough boundaries. We were referred to examples, including the Olympic Legacy and Old Oak/Park Royal Opportunity Areas, where a strategic approach to dealing with contamination has been successfully taken. It can be helpful if plans consider a strategic, phased approach to dealing with potential contamination if this is an issue over a wide area⁶⁸ and therefore we agree with the Mayor’s suggested changes to policy SD1 and reasoned justification that encourage a strategic approach to the remediation of contaminated land.

Strategic and Local Regeneration Areas

122. Figure 2.19 in the Plan indicates the broad location of the parts of London that are amongst the most deprived 20% in England based on the Index of Multiple Deprivation (IMD). Many of these overlap with Opportunity Areas. The IMD uses a wide range of standard data relating to income; employment;

⁶⁸ PPG-ID-33-04-2014.

education, skills and training; health and disability; crime; barriers to housing; and the living environment. It therefore provides a justified and consistent framework for identifying Strategic Areas for Regeneration across London, the detailed boundaries of which can be defined in local plans.

123. However, it will be important that boroughs take account of other local evidence, and effectively engage and collaborate with local communities, in devising plans, strategies and initiatives for these Strategic Regeneration Areas, as well as for other local areas needing regeneration. Furthermore, to provide an effective strategic framework, the Plan needs to set out high level objectives for regeneration initiatives to ensure that they contribute to Good Growth. These include tackling poverty, disadvantage, inequality and the causes of deprivation; addressing social, economic and environmental barriers; and, importantly, benefiting existing residents and businesses in an area.
124. The Mayor has suggested a number of changes to policy SD10 and the reasoned justification that we agree are necessary to make the Plan effective in these respects. We also agree that policy SD10 should set out the Mayor's strategic role in providing leadership and support for regeneration, including through his other strategies and programmes.

Monitoring outcomes in Opportunity and Regeneration Areas

125. Many of the Opportunity and Strategic Regeneration Areas include relatively high concentrations of residents and businesses from black and minority ethnic backgrounds and contain many people with other protected characteristics. Significant change in these areas, including the provision of new homes, job opportunities, infrastructure and improved public realm, should be beneficial to all existing residents and businesses. That said, there is clearly the danger that the more vulnerable and those with lower incomes, lose what they currently value in an area or are forced to move away due to higher rents and prices, as has occurred in the past in parts of London. We are satisfied that the Plan, modified as suggested by the Mayor and recommended by us, provides an effective strategic framework to help to deliver Good Growth in the Opportunity Areas and areas in need of regeneration. Furthermore, modifications to chapter 12 should ensure that the Plan provides an appropriate context for monitoring outcomes in those areas so that corrective action can be taken if necessary.

Conclusion on Opportunity and Regeneration Areas

126. Subject to our recommendations, we are satisfied that policies SD1 and SD10 provide an effective framework to help deliver development and regeneration in Opportunity Areas and Regeneration Areas in ways that are consistent with national policy and the Plan's Good Growth objectives.

Is the need for 66,000 additional homes per year identified by the Strategic Housing Market Assessment (SHMA) justified and has it been properly calculated for market and affordable housing having regard to national policy and guidance?

127. The SHMA⁶⁹ identifies a need for 66,000 additional homes per year 2016 and 2041 and closely follows the methodology of the 2013 version which was endorsed by the FALP Inspector⁷⁰. The need identified then was for 49,000 homes a year. The latest SHMA does not follow the guidance in the PPG on *Housing and economic needs assessments* on objectively assessed need. Instead it uses the GLA's population projections with a 10 years period to assess migration (the central variant). This is translated into household growth including the number and size of households expected in 2041 as well as the size and tenure of homes. The net stock approach then compares the number of future homes required with current provision. Finally, backlog housing need is added to incorporate, for example, concealed households.

128. Establishing future need for housing is not an exact science and the PPG acknowledges that no single approach will provide a definitive answer. There are therefore a number of ways that this could be tackled and it seems reasonable to draw upon the data available to the Mayor and to build on previous iterations. There is no evidence that any particular factor has been omitted. The SHMA methodology would not be consistent with other planning authorities in the wider south east. However, the PPG does not expect this but rather refers to local changes and the approach taken is transparent in accordance with paragraph 005. That said, the SHMA has explained how out migration into that area has been considered to provide a basis for future planning in the region and the GLA has provided populations and household projections for local authorities outside London⁷¹.

129. The methodology of the SHMA has not been extensively questioned. Nevertheless, we are satisfied that the apparent internal inconsistency in the data between population projections, total household projections and household type projections has been accounted for and that need has not been exaggerated as a result⁷². Recent 2017-based trend projection results indicate that household formation over 25 years is slowing compared to the previous year from an annualised growth of 48,000 to 46,000 for the central projection⁷³. However, it would not be prudent to base an overall assessment of need on a short-term fluctuation.

130. The identified backlog of 209,000 households in need of additional homes would be met over 25 years. Clearly any individual should not be expected to wait that long for their needs to be met. Those in this category are especially those in need of social rented accommodation who may have protected characteristics. But that is not what is meant because the net stock model relates to the overall flow of households in and out of housing need over time and the total backlog will be cleared when need is reduced to zero.

⁶⁹ NLP/HOU/001.

⁷⁰ Paragraph 30 of NLP/GD/06.

⁷¹ NLP/DEM/002.

⁷² NLP/EX/23.

⁷³ NLP/DEM/005.

Nevertheless previous Plans have sought to address this more quickly. However, dealing with it by 2041 would be at a rate of 8/9,000 homes per year which would be in excess of the figure of 5,000 homes identified in the 2013 SHMA. In the Mayor's view this is realistic. Furthermore, it is consistent with paragraph 159 of the NPPF which refers to meeting need over the plan period and so there is no justification for increasing the assessed need to take further account of this matter.

131. Owing to the transitional arrangements for spatial development strategies the local housing need assessment referred to in the 2019 NPPF is not directly relevant to the current calculation of need in London. Furthermore, whilst the 2016 household projections post-date the SHMA, the PPG provides that a change in the housing situation does not automatically mean that assessments are rendered out-of-date. There are too many uncertainties surrounding the implications of Brexit for it to be factored in.
132. The Mayor's argument is that increasing the total housing figures to assist in delivering more affordable homes would be unhelpful given the capacity-based approach to the setting of housing targets. We accept this. So whilst this option has been considered in accordance with the PPG⁷⁴ it would be unlikely to be effective.

Conclusion

133. The SHMA dates back to November 2017 but given that there has to be a single starting point its findings are the best and most reliable ones for plan making in the London Plan to be based on. Therefore the need for 66,000 additional homes per year identified by the SHMA is justified and has been properly calculated for market and affordable housing having regard to national policy and guidance.

Will the housing policies achieve the Good Growth objectives in policies GG1, GG2, GG3 and GG4 relating to building strong and healthy communities, making the best use of land, creating a healthy city and delivering the homes Londoners need?

134. In general terms the housing policies seek to implement the Good Growth objectives and are reflective of them. Nevertheless, a number of general themes emerged throughout the examination along the lines that the Mayor should do more to ensure that the homes Londoners need are delivered; additional monitoring is required especially data on overcrowding; there is an over-emphasis on housing numbers which will not provide the right sort of homes for people in neighbourhood communities; there is a need for more affordable housing and provision of social rented housing in particular and insufficient attention is given to health impacts.
135. The above concerns will largely be addressed under the relevant policy headings. However, at this stage it should be recorded that many of the actions required to provide suitable housing for the growing population are outside the scope of a spatial development strategy and that the planning

⁷⁴ PPG ID-2a-029-20140306.

system is only one part of the equation. Nevertheless, the Mayor has other policies and programmes designed to support housing delivery, many of which are contained within the *Housing Strategy*⁷⁵. Details of interventions in the land market; infrastructure; the home building industry; affordable housing; construction skills; precision-manufactured housing and skills and capacity in local government were provided⁷⁶. The extent of these initiatives is impressive and we formed the view that the Mayor is doing his utmost, given the limitations on his powers and resources, to stimulate the construction of suitable housing. This range of measures will go towards ensuring that the “ambitious” build-out rates mentioned in GG4E are achieved.

Conclusion

136. In general terms the housing policies reflect the Good Growth objectives of the Plan but these are considered in more detail in the following sections.

Are the overall 10 year housing target for London and the targets for the individual boroughs and corporations set out in Policy H1 A and in Table 4.1 justified and deliverable?

Does Policy H1 set an effective strategic context for the preparation of local plans and neighbourhood plans?

137. Policy H1 sets the 10 year housing targets which boroughs should plan for. Otherwise it contains a series of practical steps for the boroughs to take and properly sets the scene for increasing housing supply. In particular it refers to a number of sources of capacity where the potential for housing delivery should be optimised.

138. One of these applies to sites within Public transport access level (“PTAL”) 3-6 or within 800m of a station or town centre boundary. It seems sensible to focus development on accessible hubs even if that would not inevitably lead to lesser car use or ownership. But at least it would give an opportunity to reduce the number of car-borne journeys. Moreover, it is reasonable and justified to spread that net fairly widely rather than omit areas with lower PTALs that are nonetheless close to stations or town centres or to use a central point for outward measurement rather than the outer boundary.

139. According to the *Strategic Housing Land Availability Assessment (SHLAA)*⁷⁷ existing industrial sites account for over 161,000 homes on both designated (31,600) and non-designated sites (129,500) and about 40% of the total large site capacity. They are therefore expected to make a significant contribution to housing supply. Nevertheless, such land is also important for the economy and for those that work there. However, the SHLAA has taken account of the findings of the *London Industrial Land Demand Study*⁷⁸ to ensure that the approach to both land uses is compatible. There is therefore no reason to exclude such opportunities from Policy H1. We deal with the implications for industrial land supply later in this report.

⁷⁵ NLP/HOU/017.

⁷⁶ NLP/EX/20.

⁷⁷ NLP/HOU/002.

⁷⁸ NLP/EC/003.

140. There is also reference to the redevelopment of low-density retail parks which might have implications for bulky goods operators. However, the identification of sites in this way does not mean that such uses will inevitably be lost as their future retention can be considered as part of individual proposals.
141. Overall the types of site set out in Policy H1B(2) provide a reasonable and justifiable framework for the preparation of borough plans by drawing attention to the most likely places to increase housing supply whilst allowing for local discretion.
142. Policy H1D refers to the publication of housing trajectories by the boroughs. The targets are set by the Mayor and he is best placed to provide an overview of completions made and identified capacity across London. Because of this and as part of the plan, monitor and manage approach we consider that the Mayor should take a greater role in this respect than is indicated in the Plan. This would be especially useful if shortfalls should occur. No changes to the text of the policies is required but the Mayor should make a commitment in the supporting text to Policy H1. Therefore as **PR6** we recommend that the Mayor has a greater involvement in compiling London-wide trajectories and subsequent monitoring.

Conclusion

143. Leaving aside the question of the targets themselves, the provisions of Policy H1 generally provide an effective strategic context for the preparation of local plans and neighbourhood plans.

Are the assumptions and analysis regarding site suitability, availability and achievability and development capacity for large sites in the Strategic Housing and Employment Land Availability Assessment reasonable and realistic?

144. The SHLAA was devised in conjunction with the boroughs using a similar method to the 2013 version. It considered 11,600 large sites and identifies capacity for some 400,000 dwellings from that source between 2019 and 2029. These findings feed into the 10 year housing targets for net housing completions for the individual boroughs in Table 4.1.
145. This is a comprehensive study that has been informed by experience of previous exercises. We therefore broadly accept its conclusions about the extent of deliverable large site capacity. Individual boroughs will make actual site allocations but it is the only evidence to inform the target and the relative apportionment between different parts of London.
146. Density assumptions are based on the matrix in the current London Plan as a default but upward adjustments have been made to reflect trends in Opportunity Areas. Checking by the boroughs has reduced the original assumptions at over a third of the included sites which helps give them robustness. Furthermore, such densities are not necessarily incompatible with the delivery of family housing. Compared to past trends the allowance made for estate regeneration is very low so that this source is not overly relied on. This is reasonable.

147. A very small proportion of sites (1%) are referred to as 'low probability'. These are included as in the past some sites have come forward which were not otherwise accounted for. However, it is not entirely clear how this number of sites have been derived and whether sufficient account has been taken of sites that were expected to be developed but have not. In addition, the methodology uses a probability model which applies constraints to sites and so reduces the expected capacity by a given percentage. This gives an overall aggregate whilst recognising that some of those sites will yield completions but others will not. Such an approach should not be followed when making specific site allocations but is reasonable here given the strategic nature of the exercise undertaken. The 'discounts' applied are based on observation of past trends but the rationale for them is not clear and neither is it apparent that this approach has been vindicated by events. Nevertheless the outcomes following previous SHLAAs may not be known for some time.
148. For the Mayor it was said that consideration was being given to developing a 'rolling' SHLAA rather than undertaking a single exercise. We support that but also consider that further consideration should be given to refining the methodology and that the results following previous SHLAAs should be provided. Nevertheless, almost 75% of the large sites within the 10 year capacity are either permitted or existing site allocations. This gives a considerable degree of confidence about the deliverability. Indeed, overall we are satisfied that the assumptions and analysis regarding site suitability, availability, achievability and development capacity for large sites is reasonable. Therefore the figure of 400,000 housing units and the distribution between the boroughs can be relied upon as a target for future planning.
149. Table 4.1 does not set specific targets for different types of housing for individual boroughs. This is a justified approach as these are contained within other policies in the Plan concerned with affordable housing. Furthermore, it allows boroughs the opportunity to set their own targets based on their assessment of local need.
150. The assessment of housing need is over the entire plan period but the housing targets themselves are for 10 years until 2029. This covers the time when local planning authorities are expected to identify a supply of deliverable and developable sites in line with NPPF paragraph 47. Furthermore, London is a dynamic land market and most new development will be on re-cycled land. Given that they are derived from an assessment of capacity, setting realistic targets over a longer time span would be problematic given that circumstances might change unexpectedly. It cannot be assumed that the current apportionment will remain after 2029 especially in relation to sources in Opportunity Areas and on industrial land.
151. Therefore simply 'rolling forward' the existing targets beyond 2029 would not be effective. Paragraph 4.1.8D gives guidance to the Boroughs about how to calculate targets after that date. Whilst this does not provide absolute certainty it nonetheless provides a framework for future plan-making at borough level although it should be adjusted to refer to evidence of any identified local housing capacity [PR7]. Simply applying the local needs housing assessment after that date through this Plan would not properly reflect the capacity issues in London.

152. Once the London Plan is published its targets will take precedence over those in existing borough plans even if these have been recently adopted⁷⁹. There is concern that this is likely to create difficulties in terms of immediately meeting the requirement for a five year supply of deliverable housing sites. However, national policy does not make any allowance for a transitional period where a spatial development strategy sets an apportioned housing target. Paragraph 4.1.8B also refers to a gradual increase and encourages Boroughs to set out a realistic stepped delivery target over ten years where this is necessary.

Conclusion

153. The general approach to devising the housing targets and the contribution that large sites would make is therefore justified. However, an important component of the total figures is the contribution expected from small sites and this is dealt with next.

Are the approach to small sites, the presumption in favour of small housing developments of between 1 and 25 homes and the targets in Table 4.2 justified and deliverable and will the policy be effective?

154. The Mayor's further suggested changes divide policy H2 into two parts in order to distinguish between the general approach to small sites (now H2) and the presumption in favour of small housing developments (now H2A). The report will refer to them as such. In addition, the provisions relating to the monitoring of housing targets have been incorporated into the supporting text. We support this since these give direction as to how monitoring is to be undertaken rather than setting a policy relating to the development and use of land. Moreover, policy H2 clarifies that small sites are to be treated as a component part of the overall housing target and confirms that the proportion of housing from large and small sites may fluctuate over the plan period.

155. The SHLAA assessed the capacity for small sites. By applying certain parameters in addition to existing trend-based windfalls it is estimated that there is capacity for some 24,500 units per year over 10 years from sites of less than 0.25 hectares. This approach is policy-led rather than being based on any case studies or pilots. The outcome has nonetheless been translated into specific targets for the individual Boroughs as well as informing the policy criteria. This includes the presumption in favour of small housing developments of between 1 and 25 homes in certain circumstances.

156. The modelling and the policies herald a new approach to both increasing and diversifying possible sources of housing in the light of the growing need. The Mayor's contention is that a different and more positive mindset is required to move away from some of the more restrictive policies that are in place in borough plans. Moreover, in order to realise the untapped potential especially in outer London, it is not enough to simply rely on past trends. Rather a bolder and transformational approach is required.

157. Paragraph 48 of the NPPF establishes that compelling evidence is required in order to allow for windfall sites in the five-year supply. However, creating a new policy direction will not be possible if it is simply based on what has

⁷⁹ Section 38(5) of the 2004 Act.

happened in the past. Furthermore, the SHLAA is not an exact assessment of supply but rather one of theoretical capacity and so paragraph 48 does not directly apply. Similarly, for this purpose, there is no reason why residential gardens should not be included.

158. However, the methodology adopted applies a growth assumption purely on the basis of a reasonable estimate. This is the number of occasions that intensification is expected to occur within the existing stock each year. Whilst 1% outside conservation areas is a modest figure on the face of it (equivalent to 1 case for every 100 existing houses) there is no empirical basis for its use and it appears to have been adopted randomly. Indeed, the findings of the West London SHLAA⁸⁰ indicates that activity as a proportion of existing dwelling stock is markedly below 1%. For net completions for all schemes between 1 and 25 units within 800m of town centres or stations between 2008 and 2015 these range from 0.21% to 0.36% for the individual Boroughs.
159. The SHLAA excludes properties that are already converted to flats on the basis that bringing these forward is more complicated. However, the evidence from west London is that around 37% of recorded conversion schemes involve flatted property. In this way the SHLAA under-estimates one potential source of supply. On the other hand, all heritage assets, including conservation areas, are excluded from the presumption although this only accounts for about 3% of expected modelled capacity. But broadly these considerations can be taken to even themselves out.
160. After the growth assumption the SHLAA then uses a net growth factor to calculate the yield from each source in order to calculate the number of homes likely to come forward. Values of 2.23 are adopted for detached and semi-detached areas and 1.34 for terraced areas based on a large London-wide sample. This gives robustness to the figures and they correlate well with the west London average of 2.37. There is concern that net losses have not been accounted for. Residential garden land was not included per se but given that this is an estimate of capacity there is no reason to exclude it definitively from the assessment. Overall this aspect of the modelling is appropriate.
161. Nevertheless, in addition to the arbitrary growth assumption our second major misgiving about the approach to small sites and small housing development relates to the large scale of change envisaged. The consequence of this is to question whether the targets are realistically achievable. The short answer is that they would not be and hence they are not justified. To put this in context the targets in Table 4.2 amount to an increase in small site delivery of over 250% in outer London boroughs. At its most extreme the target for Bexley is almost 700% higher. Furthermore in Sutton, for example, 79% of the overall target is attributed to small sites. Across London as a whole, historic completions from this source between 2003 and 2017 have averaged 15,300 per annum compared to the new target of 24,500. The targets therefore require a massive 'uplift' in delivery especially in outer London which is highly unlikely to occur based on the available evidence.
162. For the Mayor it is said that the new policy is intended to re-shape attitudes and that by always looking backwards nothing would change. There is some

⁸⁰ NLP/AD/18 Part B Report para 7.71.

force in this and the market and other required ingredients may respond positively to a shift in policy. But there is little first-hand evidence of an appetite to implement these changes and so such a view appears to be hopeful rather than in any way likely.

163. Indeed, there are a range of factors that may inhibit delivery. These include whether sites are available to come forward; the unsuitability of some areas for intensification given the variety of housing typologies across London; whether owner occupiers would wish to release land; the impediments to assembling and bringing sites forward quickly; the lack of development finance; the insufficiency of small and medium sized builders, labour and building materials and the impact on borough resources in identifying and considering the number of sites required.
164. Some question the viability of such forms of development. The LPVS tested 8 small sites case studies. The majority were not viable in value band E and neither were 2 typologies within value band D. These value bands predominate in the outer boroughs where such development is likely to be concentrated. Whilst some parts of outer London may have higher values, including areas in and around town centres, there is no evidence to indicate how exactly this might affect viability. Development values in outer London may also be rising but the PPG⁸¹ indicates that policies should not be based on an expectation of future rises in land values for at least the first 5 years of the Plan. The main finding of the LPVS is therefore that not many small sites in outer London are viable and it is unreasonable to assume that this will change in the short term. These considerations also indicate that small developments are unlikely to materialise to the extent anticipated.
165. Indeed, all of the above factors will dampen the Mayor's intentions. The difficulty is that whilst the policy approach is aspirational its delivery is not realistic. In some cases the imposition of such large increases in this element of the target is heavy-handed and not helped by the lack of detailed engagement with the boroughs in deciding the small site capacity methodology. As some suggested a more nuanced approach might have borne fruit.
166. If left in their current form, policies H2, H2A and Table 4.2 would not positively contribute to the Good Growth objectives that underlie the Plan. For some boroughs, especially those in outer London, the small sites element means that the overall housing target would simply be unobtainable over 10 years. This would have implications for achieving a 5 year supply and could lead to unplanned development. There is also a legitimate concern that this eventuality would lead to an over attention on the number of units to be delivered rather than achieving the right sort of development in the right place. We understand that the policy is intended to be a clear signal that previous approaches need to change and that boroughs need to be pro-active in maximising the contribution that small sites can make. However, the policy approach goes too far too soon.
167. There are various cumulative impacts that need to be considered in relation to small sites. These include the consequences for the special character of an

⁸¹ PPG ID 10-008-20140306.

area including green cover and tree canopies, for health and social infrastructure and for transport. However, by identifying the quantum of development and by focussing it on accessible areas there is no reason why infrastructure cannot be planned for. Small sites may not produce many affordable housing units but given that housing numbers generally will increase and the other mechanisms available this is not a reason to not support them. There is insufficient evidence to indicate that the policy would impact excessively on those living in rented accommodation. The policy may nonetheless lead to a reduction in family housing due to conversions and the delivery of small units that may not respond to the required mix of sizes.

168. The presumption in favour of small housing development in policy H2A is intended to give the policy some potency. However, as a device it is cumbersome and requires qualification in part C of policy H2A as well as exceptions in parts D and E such that its impact is diluted and the task for the decision-maker overly complicated. Furthermore, there is insufficient evidence to treat all forms of residential development across all of London within PTALs 3-6 or within 800m of a station or town centre boundary as acceptable in principle. In particular, whilst paragraph 53 of the NPPF does not preclude development on residential gardens there is no evidence that a blanket presumption in favour of infill development within the curtilage of a house is justified even if limited in area.
169. Part F of policy H2A refers to boroughs using a tariff approach to affordable housing requirements for schemes of nine homes or fewer. Whilst an approach that departs from the Written Ministerial Statement of 2014 and the PPG has been accepted in some boroughs there is no evidence that small sites are a major source of supply in all of them. It may well be that on-site provision in such circumstances is not feasible but there is no justification for imposing a policy provision to that end. As such, this is not justified. Although individual boroughs are not precluded from bringing forward their own policies in this respect if this is warranted and having regard to paragraph 63 of the 2019 NPPF.

Conclusions on overall 10 year housing target for London and the targets for the individual boroughs and corporations

170. So where does this leave things? Briefly the modelling of small sites is insufficiently accurate to give a true picture of the likely available capacity. As such, it does not provide a reliable input to the overall targets. In turn, the specific presumption in favour in policy H2A cannot be supported and this policy should be deleted. This is recommended by **PR11**. There nevertheless needs to be a revised small site component of the overall target and also a policy to underline the important contribution that small sites can make.
171. The latter would be achieved by policy H2 following the further suggested changes. It puts an emphasis on small sites and provides an indication to the boroughs of the factors to consider in devising their own policies in this respect. The policy also allows boroughs to decide whether they wish to use design codes given the resource implications involved.

172. Various options have been put forward as alternative figures for Table 4.2⁸². Simply relying on past trends would not capture the potential from this source or set a challenge to develop new ways of bringing forward sites of this kind. Applying a percentage uplift to the more reliable 12 year trend would reflect history but may not reflect where future capacity is likely to exist and could produce different spatial outcomes. The Mayor has also produced alternative models using growth assumptions of 0.8%, 0.5% and 0.3%. Whilst there are misgivings about the methodology this would take better account of where the potential for small site development is most likely to exist.
173. In setting a revised target we consider that an annual growth rate of 0.3% is most likely to reflect the realistic output from small sites. This is because it relates closely to the evidence about the existing position that we heard from the boroughs and also because of the identified impediments to delivery. This is perhaps a cautious line to take but there would be nothing to prevent boroughs from adopting their own positive policies about small sites or higher targets and if we have under-estimated the potential then such developments could come forward anyway. Recommendations **PR8** and **PR10** and Appendices A and B are made accordingly in order to adjust the small sites target from 245,730 to 119,250 over ten years in Table 4.2 and the overall housing target in Table 4.1 as a consequence.
174. The upshot is that the overall target is just under 523,000 homes across the 10 year period or just over 52,000 homes each year compared to 649,300 or 65,000 homes per annum in the Plan. The contribution of small sites amounts to about 12,000 per annum. This includes both modelled sites with an annual growth rate of 0.3% and other windfall sites and, in future, can be taken to be a reliable source of supply for the purposes of paragraph 70 of the 2019 NPPF as an expected future trend. This should be confirmed in the supporting text as recommended by [**PR9**].
175. Given the failure to meet, by some margin, the identified annual need for housing of 66,000 units we did consider during the examination in public whether this Plan should be paused for further work to be done. Alternatively, we considered whether we should determine that it does not meet the tests of soundness and so should be withdrawn. The Regulations make no provision for either eventuality but rather assume that recommendations will be contained in this report. In any event, it is evident that either course of action would lead to a considerable delay creating uncertainty and thwarting the publication of other strategic policies. There would also be a “knock-on” effect for new borough plans.
176. Furthermore, the question of supply is based on capacity and given that this would be maximised as far as realistically possible it is difficult to see how the number of deliverable housing units could be increased without consideration being given to a review of the Green Belt or further exploration of potential with local authorities within the wider South East. This would all take time and in our view it is better to proceed on the basis of an adopted plan rather than one that is in limbo.

⁸² NLP/EX/26.

177. Of course, it is a major concern that the targets are so far below the assessed need. However, the evidence simply does not justify the reliance placed by the Mayor on small sites to fill the gap between the two and we are sceptical about the delivery from this source. This Plan does not provide the key to unlocking any potential. To accept the targets attributed to many of the boroughs would be setting up the Plan to fail. It is likely that some of them would be unable to demonstrate a 5 year supply of housing sites as the Housing Delivery Test would apply to individual boroughs and so result in adverse impacts. The Plan would also impose undesirable consequences on Londoners as plan-making at local level would struggle to achieve unrealistic expectations.

Conclusion

178. In summary, the presumption in favour of small housing developments of between 1 and 25 homes and the targets in Table 4.2 are neither justified nor deliverable. However, these deficiencies would be rectified by our recommendations so that the approach to small sites would be effective. Overall the recommended 10 year housing target of 52,285 per annum would be higher than the existing London Plan and above the 45,505 units completed in 2016/2017⁸³. It is therefore right to say that boroughs should use all the tools at their disposal to ensure homes are actually built. But we consider that as recommended, and with the support of the Mayor, it should be deliverable and that both the overall target and those for the individual boroughs and corporations are justified.

Does Policy H16 make adequate provision for meeting the need for gypsy and traveller accommodation including pitch provision?

179. National policy for traveller sites is contained in the *Planning Policy for Traveller Sites* (PPTS). A review by the *Equalities and Human Rights Commission* has previously highlighted some of the inequalities experienced by gypsies and travellers which are underpinned by a lack of suitable secure accommodation. This also gives rise to a number of negative impacts for this ethnic group who have protected characteristics⁸⁴.

180. A needs assessment for London was undertaken in 2007 (Fordham study). Taking the midpoint figure for each borough (excluding Bexley) the total need for pitches between 2007 and 2017 was just under 500. Since 2008 10 public pitches in total have been delivered across 3 boroughs. This excludes private sites and 10 permanent pitches have been added in Bromley, for example, over that period. There is also some dispute over the methodology of the Fordham study. But even allowing for those factors the delivery of sites in relation to need has been very slow. As a consequence, whatever the exact figures, there is clearly a significant immediate need for further provision across London.

181. The undertaking of individual need assessments by boroughs has been patchy with about a third not having done so over the last 10 years. The policy requires that boroughs with post-2008 needs assessments should update these as part of their plan-making. Those without an assessment since 2008

⁸³ NLP/MO/001.

⁸⁴ Referred to in the *Gypsy and Traveller Accommodation Topic Paper* (NLP/TP/02).

should undertake one and in the interim rely on the midpoint figures from Fordham. This survey is now very dated and it is a major failing that in many boroughs this has not been updated, notwithstanding the PPTS and duties under PSED. But in the absence of anything else it will have to serve as a proxy. The policy therefore contains a pragmatic approach to the assessment of short-term need. However, there should be a specific requirement for boroughs to include targets in their development plan documents based on identified needs and this is addressed by the Mayor's further suggested changes.

182. Furthermore, the poor record of provision indicates that the Mayor should act more decisively in setting out a strategic framework for the boroughs. This starts with a comprehensive assessment of need for pitches. The Panel report of March 2011⁸⁵ concluded that a solution relying on boroughs individually is unlikely to meet the demonstrable need for an increased number of pitches. Events on the ground indicate that the position has not markedly changed since then. Clearly boroughs would need to be involved in a London-wide study given their local knowledge and the likelihood that in many cases needs should be met locally. However, a London-wide approach would reflect the fact that London is a single housing market as well as ensuring a consistent methodology and including those on the move. The lifestyles of gypsies and travellers does not necessarily relate to borough boundaries.
183. Therefore we recommend that the Mayor should commit to instigating and leading a London-wide accommodation assessment for gypsies and travellers **[PR16]**. This should be done as soon as possible as a priority in order to inform an updated London Plan. Furthermore, the Mayor should continue to take a lead in seeking to devise ways of making provision for this group so that the next version of the Plan includes policies to help ensure that sufficient land is provided to meet needs. Such intentions can be expressed in the supporting text and we do not wish to prescribe the precise wording. Nevertheless a clear undertaking should be given and pursued prior to the review of the Plan.
184. Policy H16B gives a much wider definition of "gypsies and travellers" compared to that in Annex 1 of the PPTS. The rationale for this is that the national definition excludes many of those who have ceased travelling but who identify with the cultural traditions of this group. As a consequence there are effects for under-counting and equality. The Plan therefore indicates that in assessing need those living in caravans, those with a cultural preference to not live in bricks and mortar accommodation and those that have ceased to travel for reasons of health, education or old age should be included. This clause has considerable support from the gypsy and traveller community.
185. However, the definition does not just add to the national definition but would be entirely different. Past approaches to London under previous legislative regimes have no real bearing now. The proportion of gypsies and travellers living in permanent accommodation rather than caravans may be higher than elsewhere. High land values also make provision difficult. That consideration nevertheless obtains in other large cities. In any event, section 124 of the *Housing and Planning Act 2016* requires local housing authorities to consider

⁸⁵ NLP/AD/04.

the need of people residing in or resorting to their district with respect to the provision of sites on which caravans can be stationed. Consequently, those outside the PPTS definition should not “fall through the net”.

186. We appreciate that there is some dissatisfaction with the PPTS definition in that it divides an ethnic group into two. But there is insufficient evidence to demonstrate that it should not equally be applied in London as it is elsewhere in the country. Or put another way there is nothing so distinctly different about London to warrant a departure from national policy. On a practical level the wording of the London Plan definition is broader than just covering those who might identify as gypsies and travellers. Furthermore, it would lead to anomalies around the periphery of London in that individuals would be defined differently for planning purposes depending on whether they are assessed by a district outside the capital or one of the boroughs.
187. The overriding conclusion on this point is that the definition of gypsies and travellers should be consistent with national policy. To that end **PR17** recommends the deletion of policy H16B and consequential changes should be made elsewhere throughout the Plan.
188. The under-provision of pitches across London has an adverse impact on the cultural identity, health and well-being of travellers as a group with protected characteristics. Our recommendations should not result in the accommodation needs of anyone from within that ethnic group being excluded. Furthermore, the recommendation for a Mayor-led pan-London assessment of need should provide greater clarity and so advance opportunities for further site provision. The other elements of policy H16 should directly address the needs of this protected group.
189. As far as travelling showpeople are concerned, reliance is largely placed on national policy and existing sites are to be protected. The Plan does not acknowledge the need for temporary stopping places but this is addressed by a further suggested change to the supporting text which refers to research regarding the negotiated stopping approach. Attention is also drawn to the duty to consider the needs of those with a need for caravans or places on inland waterways where houseboats can be moored.

Conclusion

190. Subject to our recommendations and the Mayor’s further suggested changes, Policy H16 will make adequate provision for meeting the need for gypsy and traveller accommodation and also considers the needs of travelling showpeople and boat dwellers in sufficient detail.

Would the approach to affordable housing in the Plan (policies H5-H8) effectively assist in delivering the quantum and type of affordable housing needed?

191. The identified need for affordable housing in London is acute, being some 65% of overall housing need⁸⁶. Recent delivery to date has fallen significantly short

⁸⁶ NLP/HOU/001.

of meeting identified need. Between 2014/15 and 2016/17 affordable housing output averaged 21% of total provision⁸⁷. In light of this, the Plan's approach to affordable housing aims to bring about a step change in delivery. The approach set out in the Plan was first introduced in August 2017, through the *Mayor's Homes for Londoners Affordable Housing and Viability Supplementary Planning Guidance*. It has shown promising results in raising the overall delivery above 21% since then⁸⁸. Policies H5 to H8 set out a strategic target, and an approach aimed to deliver it, balancing quantum and tenure to meet identified need.

192. The 50% strategic target falls significantly short of the 65% need identified in the SHMA. However, any target needs to be deliverable and realistic. The target proposed strikes a balance between the requirement to meet the full objectively assessed need for both market and affordable housing⁸⁹, and the requirement to not impose cumulative burdens that could put delivery of the Plan at serious risk⁹⁰, having regard to public subsidy available to fund affordable housing.

193. To meet the strategic target, the Plan includes provisions to deliver a combination of affordable housing planning contributions delivered without grant, and additional affordable housing partially funded through affordable housing grants or in-kind contributions, such as discounted public land. Specific requirements are set out to maximise affordable housing from industrial land, public land, affordable housing providers and strategic partners. Achieving minimum tenure mixes to meet identified need and ensure genuine affordability are a vital part of the overall strategy. The strategic target is ambitious and greater than the target in the current Plan. However, taking all these considerations into account, and with a logical policy framework to its achievement, it is considered realistic and deliverable.

194. Policy H5 requires major development to provide affordable housing in accordance with the threshold approach, which is considered in the next section. Provisions relating to registered affordable housing providers receiving grant and the Mayor's strategic partners⁹¹ reflect contractual conditions of funding under the Mayor's affordable homes programme. Given their potential contribution to meeting the affordable housing target and the contractual obligations highlighted, the requirement for higher affordable housing provision in their cases is justified.

195. The approach to public land reflects Government's attitude to the role of public land in assisting delivery of affordable housing⁹², the opportunity to capitalise on the generally lower existing use values, and that public land should be used to deliver the public benefits that are most needed and secured in perpetuity. There were calls for the affordable housing requirement to be lower, to assist public sector operators, including the NHS, to meet their core business

⁸⁷ NLP/MO/001.

⁸⁸ Oral evidence of Mayor's team morning hearing session 26 February 2019.

⁸⁹ NPPF paragraph 47.

⁹⁰ NPPF paragraph 174.

⁹¹ Affordable housing providers who commit to deliver ambitious development programmes through a flexible partnership with the Mayor. Each partnership involves at least 1,000 new housing starts, with at least 60% of them genuinely affordable.

⁹² 'PM: The government will directly build affordable homes, January 2016' 8 DCLG, Public Land for Housing programme 2015-20 Annual Report, February 2017.

requirements and to address concerns that the higher thresholds set will act as a disincentive to residential development. However, with the focus on initiating a step change in affordable housing delivery, and the availability of a route to assess viability if required, the approach is justified.

196. The approach to industrial land aims to ensure industrial floorspace is reprovided, in accordance with policies E4-E7, whilst safeguarding against overpayment for sites suitable for residential development. Further suggested changes clarify that the approach applies to sites no longer required for utilities infrastructure and a transport function and take appropriate account of the cost of remediation. As the costs can be significant, this is necessary. These requirements were tested through the LPVS and found to be viable in most parts of London. Whilst intensification options would be more challenging to deliver in some parts of London, the threshold approach would provide a route to address genuine barriers to delivery. Overall, it is a reasonable and justified approach.
197. The requirement for affordable housing provision on site is rightfully set out, providing an off-site or cash in lieu alternative in exceptional circumstances only. This is necessary to ensure mixed and balanced communities and to provide greater certainty on speed of delivery.

The threshold approach

198. One of the main planks of the Plan's approach to achieving the strategic target is the application of the threshold approach to viability testing set out in policy H6. This sets quantum and minimum tenure mix threshold requirements, which if met, remove the need for viability testing as part of the planning application process. It therefore provides a "fast track route" to planning permission and a "viability tested route" for developments unable to meet the threshold requirements set. Development proposals following the latter route need to provide viability evidence and are subject to stringent viability reviews to ensure the maximum amount of affordable housing is delivered and to incentivise timely delivery. The quantum threshold of 35% has been tested through the LPVS and with the flexibility specified by the tenure mix requirements found to be viable in most cases. There are specific requirements for public sector land and specific industrial sites. They reflect the strategic approach to affordable housing set out in policy H5. Specific requirements are set for specialist types of housing, which are assessed later.
199. Both routes to permission include an early stage review, which will help to incentivise build out. The "viability tested route" includes a late stage review, which will give decision makers confidence that affordable housing provision has been optimised. This approach accords with national guidance⁹³. In achieving the policy aims the requirements are necessary and justified.
200. The threshold approach addresses concerns regarding the operation of viability testing which causes significant delay and uncertainty in the development process. It provides greater certainty, clarity, transparency and consistency in

⁹³PPG ID-10-009-20180724.

the development process by embedding housing requirements in land values. It has the potential to increase quantum and speed of delivery.

201. The threshold requirements set are aimed to incentivise developers to meet the requirements without grant, thus overall exceeding them with grant. For each category of development, the threshold requirements were challenged. However, they have been tested through the LPVS and found to be generally viable. The “viability tested route” provides a pathway to achieve planning permission for schemes that cannot meet the relevant threshold requirements for genuine viability reasons. Further suggested changes commit the Mayor to reviewing the thresholds in 2021 through a focussed review of the Plan or supplementary planning guidance. Taking all these considerations into the balance, the thresholds set in these policies represent a reasonable and justified approach.

Tenure mix requirements

202. The affordable housing tenure mix requirements, set out in policy H7, include London Affordable Rent and Social Rent homes. The tenures sought would meet the needs of households identified in the SHMA as in need of low-cost rent homes. The preferred tenures of London Living Rent and London Shared Ownership would meet the needs of those identified in the SHMA as in need of intermediate homes. Whilst some challenged these definitions, they accord with national policy⁹⁴. They are a fundamental part of the strategy and a justified response to the Government affordable housing regime.

203. In terms of tenure mix, to access the “fast track route”, the threshold approach requires 30% low cost rent, 30% intermediate products, with the remaining 40% to be decided by boroughs. The presumption is that the remaining 40% will be focussed on low cost rent, given the identified need in the SHMA. Given the potential for developments with up to 70% low cost rent to be delivered through the “fast track route”, the policy would have the potential to contribute to meeting the significant identified need for low cost rent homes identified in the SHMA, which is some 47% of affordable need. Enabling developments that provide 75% or more affordable homes to access the “fast track route” would further assist in meeting identified needs.

204. Overall, the minimum tenure mix requirements attempt to strike a balance between ensuring London’s overall strategic housing needs are met, including affordable need, and providing boroughs with adequate flexibility to address local variations in viability. In doing so, it is a justified approach. The Mayor has also committed to reviewing the tenure mix requirements in 2021, when the new Government funding round will be in place. This will give adequate time to review the efficacy of the approach to tenure, by which time it will have been operating for some four years.

Monitoring

205. Given the strategic need for affordable housing and the Plan’s novel approach to addressing it, a specific policy to ensure adequate monitoring at borough level is necessary and is provided by policy H8. The policy sets a broad

⁹⁴ NPPF Annex 2.

framework for monitoring with an appropriate level of prescription, leaving it to the boroughs to devise the detailed workings in conjunction with the Mayor. If the approach to affordable housing taken proves to be less promising than recent evidence suggests, it would have a disproportionate effect on people with low incomes and on groups with protected characteristics. However, all public authorities are required to adhere to the PSED and therefore additional provisions in this regard are not required.

Conclusion

206. The significant need for affordable housing is not in dispute, along with the fact that delivery has been significantly lower than identified need since at least 2013/14. The approach set out in policies H5 to H8 aims to provide a step change in delivery to address this. It is a new approach. Having operated since late 2017, it is appearing to bear fruit. Monitoring mechanisms are in place to assess its future efficacy and a review of thresholds and tenure mix if necessary set for 2021. Taking all these considerations into account, it is worth giving it more time to deliver.

207. All in all, we consider that the approach to affordable housing set out in policies H5-H8 would effectively assist in delivering the quantum and type of affordable housing needed. This would assist in providing equality of opportunity to those with protected characteristics who are disproportionately represented amongst those with lower incomes. It is justified.

Would policies H13 to H18 effectively assist in the delivery of different types of homes to meet the diverse needs of London's communities, including affordable housing?

Build to Rent

208. Build to rent is an emerging housing model that has made a significant contribution to housing supply in recent years, comprising some 25% of starts over the last year⁹⁵.

209. Policy H13 sets out criteria to define build to rent, which if met provide access to specific affordable housing requirements for this type of housing. The criteria have been worked up in close collaboration with the industry and are generally supported by it. They are necessary to assist policy implementation. Requirements for development to be held under a covenant for 15 years are necessary to ensure that policy provisions apply to genuinely build to rent development only. Similarly, a claw back mechanism, in the event that the covenant is broken, is necessary to recoup affordable housing contributions lost.

210. A bespoke affordable housing requirement is proposed. This is justified, given the differences between build to rent and build for sale development models. Indeed the LPVS indicates that build to rent can be slightly less viable than for sale. Most case studies tested demonstrated that 35% affordable housing with the prescribed tenures can be delivered viably, except where values are

⁹⁵ Oral evidence of Mayor's team at hearing session afternoon of 12 March 2019.

at their lowest. The “viability tested route” would be available to assess those cases.

211. As discount market rent is set as the default, it will assist on-site provision, which provides the potential for integration with the main development benefitting from the same services and management.
212. As discount market rent is an intermediate product, it is not appropriate to seek social rent levels. However, this is an emerging product and its potential to deliver homes is still unknown. To address the eventuality that it becomes a more dominant tenure, and given the identified affordable housing need, boroughs may establish local affordable housing requirements for low cost rent where this is justified. These requirements, along with the application of the Plan’s other requirements, including design and space standards, have been informed by the LPVS. Overall, the requirements strike an appropriate balance between incentivising delivery of affordable housing, ensuring that potential further affordable contributions are not forgone, whilst assisting delivery of this product.

Supported and specialised housing

213. Policy H14 provides boroughs with policy direction to identify which groups may require supported or specialised accommodation and provides support for its delivery, retention and refurbishment.
214. A list of groups who may require such accommodation is provided. It is not an exhaustive list and is rightly limited to those whose housing requirements are likely to take a different form to mainstream housing. This includes some groups with protected characteristics, and in this regard it would represent a direct benefit to those groups.
215. There were calls for it to more comprehensively address the needs of those with protected characteristics. However, that is not the purpose of this policy. The needs of those with protected characteristics, whose housing requirements would be met by mainstream housing, are addressed in the other housing policies in the Plan. Those policies support accessible homes in locations close to facilities and services in town centres.
216. The policy relies on boroughs to deliver its requirements through development plans and development management. The requirement for boroughs to locally assess needs, where necessary, is essential. This is set out in the supporting text. To ensure effectiveness, we recommend that this requirement is included within the policy [**PR14**].

Specialist older persons housing

217. The provisions of policy H15 require boroughs to work with providers to identify sites suitable for specialist older person housing, (sheltered and extra care accommodation) having regard to benchmark numbers. The role for non-specialist housing suitable for elderly people is dealt with by other policies in the Plan and this is appropriately explained in the supporting text.

218. The benchmark numbers in Table 4.4 will assist boroughs and providers in addressing local need. This approach was established in the current Plan. Given the scale of identified need, and to give boroughs a clear steer on delivery expectations, the approach is justified.
219. The figures set out are not maxima and do not provide a tenure breakdown. This recognises the need for flexibility for providers and boroughs to respond to local demand, accounting for the rapidly changing range of products on the market and the variation in delivery models. The absence of a tenure mix is therefore a justified approach.
220. The policy requires specialist older person housing to deliver other Plan requirements, including accessible housing, inclusive design and affordable housing. This is necessary to assist in providing older Londoners, who wish to access specialist older persons housing, with an equivalent level of choice in accessible and affordable housing to that available to others. This would assist advancing equality of opportunity for those with protected characteristics.
221. The policy requirements for affordable housing accord with the Plan's general approach. However, they provide greater flexibility on tenure split, which should be locally justified and set out in development plans. As this would assist in meeting more readily the London wide identified need, this is a justified approach⁹⁶. Some challenged the appropriateness of on-site provision, but convincing evidence of the barriers to this were not presented, and there was evidence that some developers are already providing it⁹⁷. The requirement for on-site provision is necessary to assist in delivering mixed and balanced communities.
222. The threshold requirements for affordable housing have been challenged, on the basis of the higher build costs compared with mainstream housing. This is reflected in the findings of the LPVS, which indicates that viability for sheltered and extra care housing is more difficult in lower value areas. Further the case studies tested for this type of housing in the LPVS do not reflect industry practice. For these reasons, we are not convinced that viability would not hamper delivery. However, in light of the significant need for affordable homes and given that the "viability tested route" is available to assess the impact of viability on affordable housing requirements, it is worth waiting to assess the impact of this new policy approach. However, close monitoring should take place to ensure that the impacts are properly assessed and fed into any review.
223. Given that lack of clarity on the definitions and use class categories applied to specialist older persons housing has been identified as a barrier to delivery⁹⁸, this policy attempts to address this point. It sets out criteria, informed by the Care Quality Commission's guidance on regulated activities for providers of sheltered housing, extra care housing and residential nursing care accommodation⁹⁹. Its purpose is to establish what falls within the remit of care home accommodation, to which the policy would not apply, and that which falls within the remit of specialist older persons housing (sheltered

⁹⁶ NLP/HOU/023.

⁹⁷ Mayor's team oral evidence at hearing session on the afternoon of 27 February 2019.

⁹⁸ NLP/TP/01.

⁹⁹ Care Quality Commission Housing with Care October 2015.

housing and extra care accommodation) to which the policy would apply. This approach accords with current national guidance, which advises that the level of care is a legitimate consideration when local authorities are defining the use class of specialist older persons housing¹⁰⁰. However, the policy needs to clarify that its provisions also apply to specialist older persons housing not providing an element of care. Modification is necessary to provide clarity on this point [**PR15**].

Purpose built student accommodation

224. Policy H17 requires boroughs to ensure that local and strategic needs for purpose built student accommodation are addressed, ensuring mixed and inclusive neighbourhoods.
225. Given the acute identified need for affordable housing the policy rightly applies the Plan's affordable housing policies to student accommodation. This accords with national policy¹⁰¹ and guidance¹⁰² and given the identified need¹⁰³ we have no doubt that it is necessary to ensure that the lack of affordable student accommodation does not act as a barrier to higher education study in London. The threshold required for affordable housing is challenged on the basis of viability, the results of the LPVS and the limited selection of models tested in it. There is some force in the concern that this will hamper delivery. However, recent evidence suggests that in some boroughs the delivery of purpose built student accommodation has outstripped mainstream housing¹⁰⁴. In addition, it was confirmed that some purpose built student accommodation is coming forward with a greater level of affordable housing than required by the policy¹⁰⁵. Development that is genuinely challenged by viability considerations can be assessed through the viability tested route and given the acute shortage of affordable student accommodation and the review mechanisms in place for the thresholds for the "fast track" affordable housing route, this is a justified approach.
226. The approach to affordable housing was developed in close collaboration with the Mayor's Academic Forum. The definition of affordable purpose built student accommodation is based on the proportion of the maximum student maintenance loan considered reasonable for a student to spend on accommodation costs. Using the student maintenance loan as a basis is logical as it is the student income that the Government considers necessary to cover living costs¹⁰⁶. Whilst other measures may be valid, this yardstick would provide consistency across London and is a sensible way to address the needs of different types of students.
227. Nomination agreements are intended as a mechanism to help demonstrate that the development is in a suitable location, and fits a design specification to meet the need for purpose built student accommodation. However, even

¹⁰⁰ PPG ID-63-014-20190626.

¹⁰¹ NLP/GD/03 NPPF paragraph 159.

¹⁰² PP ID-2a-021-20160401.

¹⁰³ NLP/HOU/019c.

¹⁰⁴ HBF statement in respect of matter 32.

¹⁰⁵ Mayor of London, Planning report GLA/4230a/LB01.

¹⁰⁶ NLP/HOU/019c.

though circumstances in which this requirement could be legitimately circumvented are set out, there are concerns that it would frustrate delivery.

228. Such agreements are essentially commercial contracts. They can involve lengthy and complex negotiations and some higher education providers may not wish to enter into them and this could negatively impact delivery. It is too stringent a requirement therefore. In any event ensuring the accommodation is secured for students along with other criteria in the policy would assist in defining local need. For all these reasons, we consider that additional flexibility should be introduced to encourage nomination agreements rather than require them [PR18]. Encouraging nomination agreements would still assist in delivering all other requirements of the policy, including adequate functioning living space and layout.

229. Whilst the national space or accessibility standards do not relate to this type of accommodation, other Plan policies require inclusive and high quality design and would assist in ensuring the needs of students with disabilities are accommodated. This would assist in ensuring equality of opportunity for those with disabilities.

Large scale purpose built shared living

230. This is a new type of development which may provide a housing option for single person households unrestricted to certain groups or occupations. Policy H18 aims to respond to this emerging housing type and demand and to manage it to provide good quality accommodation. The Mayor has worked closely with the industry and the criteria used to define it, although detailed, are generally supported. They are necessary given that this form of housing has no formal planning definition. They reflect the need for a management regime to deliver communal services and facilities and to provide minimum tenancy lengths to ensure they are differentiated from a hostel type setting.

231. As this is not self-contained accommodation, it is not subject to the Plan's space and design standards. However, the design and size of both communal and private spaces will help determine its quality. Given that this is a new concept, the Mayor's commitment to produce space standards if deemed necessary is appropriate and justified.

232. This type of accommodation is required to contribute to affordable housing, by way of a cash in lieu payment. As large scale purpose built shared living accommodation does not meet minimum space standards and is not self-contained, it would not be suitable for most households in need of genuinely affordable homes, including families. A cash in lieu alternative to on site affordable housing provision is therefore justified.

233. There was concern from the industry regarding an in perpetuity payment. Whilst the principle is similar to a discount market rent arrangement, we accept that the requirement for a payment is not. It may therefore deter investment and delivery. On balance however, as there are two options for payment of the contribution to be defined and justified at local level, appropriate flexibility is provided.

234. As this is an emerging typology, the policy requires all schemes to go through the “viability tested route”, which will ensure that affordable housing provision is maximised. Schemes that meet the affordable housing requirements are not subject to a late stage review, which would incentivise achievement of the minimum requirements.

Conclusion

235. Subject to our recommendations, Policies H13-H18 would effectively assist in the delivery of different types of homes to meet the diverse needs of London’s communities. In setting out bespoke approaches to affordable housing, they are justified. In addition, the provisions set out are necessary, effective, justified and consistent with national policy.

Is policy H9 consistent with national policy? Is it justified and would it be effective in helping to deliver the homes needed?

236. Policy H9, in encouraging boroughs to disregard the Vacant Building Credit¹⁰⁷ (“VBC”) except in limited circumstances, would be contrary to national policy. The justification for the approach taken is the significant housing need, including affordable housing need and past rates of delivery without VBC, indicating that brownfield land would come forward for development in the absence of this incentive. Whilst the need for affordable housing is acute and the potential impact of the VBC significant, these circumstances are likely to apply to most large urban areas. Further, we find that there is insufficient evidence of the impact of disapplication of the VBC across London as a whole to justify a departure from national policy. If boroughs wish to disapply the VBC, they can do that based on local evidence, which some boroughs already have. For all these reasons, the policy should be deleted [PR12].

Conclusion

237. Policy H9 is inconsistent with national policy. There is insufficient justification to support it. Therefore it should be deleted.

Are policies H4 and H11 necessary and would they effectively assist in boosting the delivery of homes to meet identified need?

Meanwhile use as housing

238. Policy H4 encourages the temporary use of land and property awaiting longer term development for housing. This could include the erection of precision manufactured homes, which are homes mainly constructed off site, which can be rapidly erected on site. Policy H4, along with other policies in the Plan¹⁰⁸, would support the aims of Good Growth in making the best use of land and delivering the homes needed, especially as homes could be constructed quickly. The quality of housing could be controlled through other policies in

¹⁰⁷ Where a vacant building is brought back into any lawful use or is demolished to be replaced by a new building, it offers a financial credit equivalent to the existing gross floorspace of relevant vacant buildings when the local planning authority calculates any affordable housing contribution which will be sought.

¹⁰⁸ Policies SD7; HC5; HC6; D7.

the Plan, particularly policies D4 and D5, and monitoring would ensure that the provision of temporary homes would be considered in assessing overall housing supply. Exemplars of this type of development were presented to the examination, which gives assurance of the quality that can be achieved and their potential contribution to the local environment¹⁰⁹.

239. Concerns were expressed that the policy does not go far enough, in setting out enabling provisions to support these uses. However, this is a new approach and generally it strikes the right balance between incentivising development and supporting temporary uses. It provides the necessary flexibility for boroughs to identify and support these uses, taking account of local circumstances.

Best use of stock

240. Policy H11 seeks to ensure that new homes meet identified need. It addresses under occupation, homes left empty including buy to leave and short stay holiday rentals, all of which could compromise the ability of this Plan to meet identified housing need. Measures to address this are therefore necessary and on the basis of identified need they are justified.

241. Properties left vacant are a small proportion of overall supply, but vacancies can compromise the supply of homes for people to live in and erode community cohesion. Therefore, support from the Mayor, using his powers in tackling this issue, is a justified and legitimate approach. The short term letting of homes is a recent phenomenon and requiring boroughs to take account of the impact on housing stock when considering applications for short term letting will help address its negative impacts. The Mayor has committed to supporting boroughs in these matters, which again will assist in meeting identified housing needs.

242. Policy H11 part D sets out the need to take account of identified housing need in the consideration of houses in multiple occupation, and in light of this, their protection where they are of a reasonable standard. Given the contribution that houses in multiple occupation make to meeting identified strategic housing need, this is a justified approach.

Conclusion

243. Having identified and addressed matters that may frustrate meeting the strategic housing need and ways in which delivery of homes can be speeded up, the policies are justified. Policies H4 and H11 would effectively assist in boosting delivery of homes to meet identified need.

Would policy H10 effectively protect London's existing housing stock, including as part of estate regeneration?

244. Further suggested changes amend policy H10's title to "loss of existing housing and estate redevelopment", which is necessary to clarify the policy intent. The policy does not deal with the details of estate regeneration. This will generally occur as part of a wider process and as some elements fall

¹⁰⁹ Development of a temporary mixed-use development at Ladywell, Lewisham.

beyond the remit of this Plan, and detailed advice on such matters is embodied in the *Mayor's Good Practice Guide to Estate Regeneration*, the policy focus is justified.

245. The policy seeks to protect existing housing, including hostels, staff accommodation and shared and supported accommodation that meet an identified need. Given the scale of identified housing need including affordable housing¹¹⁰, this is a justified approach. Ensuring that other types of housing are protected, where they meet an identified need, will ensure adequate flexibility to reflect local circumstances.
246. Policy parts H10 parts AB, B and BA introduce a number of further suggested changes, which, together protect existing affordable housing where it involves demolition, including where this relates to demolition as part of an estate redevelopment programme. These firstly, at H10AB, set out a new provision which clarifies that other options should be considered prior to redevelopment. This is necessary to ensure that any redevelopment accords with the *Mayor's Good Practice Guide*. This advises on appropriate approaches, including the consideration of repair, refurbishment and infill development and the need for community involvement. Supporting text sets out these key provisions and provides the necessary explanation for this approach.
247. Further suggested changes also introduce, as part of the policy, that social rent housing, where facilitating a right of return, should be replaced by social rent. Where it is not facilitating a right of return, it may be replaced by social rent or London Affordable Rent. This would strike an appropriate balance between providing protection for existing tenants and allowing some local flexibility in terms of rent levels to assist in enabling local viability. This accords with the *Mayor's Housing Strategy* which commits to ensure that affordable homes demolished as part of estate regeneration schemes are replaced on a like for like basis¹¹¹.
248. The policy would ensure that replacement affordable housing is integrated into development, which would assist in delivering mixed and balanced communities. All development proposals which include the demolition and replacement of affordable housing are required to follow the "viability tested route". This approach, aimed to maximise the delivery of affordable housing, is justified given the acute identified need.
249. Assessing affordable housing on the basis of floorspace would provide a robust approach to assist an overall uplift in provision. Other measures, such as numbers of units or number of habitable rooms, could result in a net loss of overall provision. Requiring replacement on a like for like basis may not enable local decision makers to meet identified need in terms of unit mix, number of bedrooms and bed spaces. Using housing floorspace as a measure provides flexibility to meet identified need, within the context of current space standards, including the need for larger units. It would provide the necessary flexibility to deliver a greater number of units on a similar footprint or address matters such as overcrowding without compromising on meeting affordable housing need.

¹¹⁰ NLP/HOU/001.

¹¹¹ NLP/HOU/017.

250. As some groups with protected characteristics, are disproportionately represented amongst those seeking affordable housing, the policy would represent a direct benefit to those groups, particularly in enabling the provision of larger units.

Conclusion

251. We conclude that policy H10 would be effective in protecting London's affordable housing stock when redevelopment takes place and delivering the homes that Londoners need.

Would the Plan's approach to determining size mix of homes assist in meeting identified need?

252. Policy H12 seeks to ensure that the size mix of new homes meets identified need, setting out criteria to determine site specific size mix, the requirement for boroughs to provide guidance on size mix of low cost rent but restricting the use of area wide size mix requirements for other tenures.

253. H12 part A sets out criteria that boroughs, decision makers and applicants should apply in determining the housing size mix of development. Further suggested changes clarify that this should be based on robust local evidence where available. Where this is not available, it should be based on the range of housing need and demand set out in the 2017 SHMA, including consideration of all size mix scenarios within it. This provides necessary clarity in a situation where local evidence may not accord with that in the SHMA. Considering all scenarios in the SHMA will assist in tailoring London-wide evidence to best fit local circumstances and meet local identified need. This is particularly pertinent, given that size mix requirements in the SHMA vary considerably based on assumptions made about future under occupation in the homeowner, private rent and low cost rent sectors. Indeed the third scenario in the SHMA, which assumes under occupation in the homeowner, private rent and low cost rent sectors continue at current rates, indicates that family sized homes are a much larger proportion of total need in the market sector than the low cost rent sector¹¹², making up some 62%.

254. Some criteria support smaller dwellings. However, alongside all other criteria, which require a range of unit types, tenures and price points, it is a justified framework to help deliver a site specific housing size mix.

255. There were calls for pan London targets for size mix across all tenures, in particular to ensure that larger dwellings are delivered. However, that approach would fail to reflect the variations in size mix requirements across London. It would fail to accord with national policy, which requires local planning authorities to identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand¹¹³.

256. Policy H12 part C precludes boroughs from setting prescriptive area wide dwelling size mix requirements for market and intermediate housing. This

¹¹² NLP/HOU/001.

¹¹³ NPPF paragraph 50.

approach is based on the premise that area wide size mix requirements are unable to respond to the nuances of market demand and may slow down delivery and hamper viability. There was conflicting evidence as to whether they have been adhered to and effective in the past.

257. However, restricting boroughs in this way could undermine their ability to respond to local need, in particular, the provision of larger dwellings suitable for families, given that higher rates of return may influence developers to concentrate on smaller dwellings. Site allocations could deviate from any area wide size mix requirements where justified through the application of policy H12 part A criteria and the design led approach. Further, any area wide requirements would have to be based on robust evidence and subject to examination.

258. For these reasons, the requirement of H12 part C seems to be particularly onerous. Enabling boroughs to set local area wide size mix targets for market and intermediate housing, where locally justified, would be a legitimate approach and could assist in enabling local need to be met. Therefore, H12 part C should be deleted [PR13].

259. Policy H12 part D sets out requirements for boroughs to set guidance on the dwelling size mix of low cost rent homes. This will assist in enabling the acute sub regional and local need to be met. As boroughs are housing authorities, they are best placed to ensure delivery of low cost rent homes that meet the needs of those who occupy them, including priority households on the register.

Conclusion

260. Subject to our recommendations above, the Plan's approach to determining size mix of homes in policy H12 would assist in delivering the homes to meet identified need.

Would policies D4 and D5 assist in the delivery of high quality homes that meet the needs of all?

Housing quality and standards

261. Meeting the housing needs in this Plan will require some high density development. Ensuring homes are of good quality and fit for purpose is a strategically important issue. Policies D4 and D5 work together to ensure that the significant increase in housing needed will not compromise the quality of homes across tenures and that they will meet the needs of all, including the elderly and those with disabilities. Given the increased focus on small sites, and the support for higher densities in appropriate locations in both outer and inner London, consistency in the application of the standards across London is justified.

262. There is concern that the approach taken in policy D4 is overly detailed and prescriptive for this Plan. However, given the proposed level of housing to be delivered in this Plan, setting out minimum standards and key qualitative aspects to be addressed in housing design is a justified approach. It strikes the right balance between prescription and providing an effective and consistent approach across London. The Mayor has committed to production of

guidance on the implementation of policy D4 for all housing tenures. The standards and qualitative matters addressed in this policy are anticipated to be a starting point, with a more fine-grained approach to different housing tenures set out in the supplementary planning guidance. This will ensure that the policy deals with high level design matters only at a strategic level and is an appropriate and logical way forward.

263. Some policy provisions are included within the current Plan or the *Housing Supplementary Planning Guidance*. The private internal space and accessibility standards are a continuation of current Plan policy and generally align with the Nationally Described Space Standard¹¹⁴. They were subject to the rigours of a previous examination¹¹⁵ and the evidence base was found to be proportionate and robust. They have proved to be effective in ensuring quality and sustainability of new housing. No change in circumstances is suggested to indicate that they are no longer justified and no evidence that it would not be viable to meet them is before us¹¹⁶.
264. The required ceiling heights deviates from the Nationally Described Space Standard. Given the unique heat island effect of London, the distinct density and flatted nature of most of its residential development, this is justified in ensuring adequate quality, especially in terms of light, ventilation and sense of space. As its requirements do not apply to all the internal area of a dwelling, it would be unlikely to apply to non-habitable rooms, such as bathrooms. This is justified.
265. The level of precision in terminology, particularly the term “high quality design” as expressed in D4 part B was questioned. However, the policy adequately defines what high quality design is.
266. Policy D4 part GA9 sets out minimum standards for private outdoor space. As it enables boroughs to apply any higher local standards, and they are set as minimums, it would account for a situation where larger gardens are appropriate to preserve local character.
267. Policy D4 part E seeks to discourage single aspect dwellings, unless the application of the design led approach indicates that this is the most appropriate design solution. This would apply to those typologies where single aspect may be the most efficient and effective layout. Given that single aspect dwellings are more difficult to ventilate naturally and are more likely to overheat, the approach is justified¹¹⁷. Modification of the supporting text is required to enable appropriate local decision making [**PR20**].
268. Policy D4 part F addresses the requirement for sufficient daylight and sunlight to new and surrounding housing. Further suggested changes confirm that detailed guidance on the application of the British Research Establishment guidance on daylight and sunlight will be forthcoming in the Mayor’s guidance referenced in the policy. This addition will assist in ensuring adequate levels of sunlight and daylight in homes.

¹¹⁴ *Technical housing standards-nationally described standard* (DCLG March 2015).

¹¹⁵ NLP/MS/02.

¹¹⁶ NLP/VI/001.

¹¹⁷ NLP/HOU/010.

269. There were many suggestions for matters to be addressed in Table 3.2, which sets out the qualitative design aspects to be addressed in housing developments. Further suggested changes include the requirement for communal outdoor spaces to be surveilled, which is necessary to ensure that they are safe areas, particularly for children. There are no other matters that are essential for soundness especially as many accord with matters addressed in the current Plan or supplementary planning guidance¹¹⁸. The list in the table covers the broad range of key matters to be addressed in the design process, including layout, orientation, outside space, usability and ongoing maintenance and it is justified.

Accessible housing

270. Policy D5 sets out London wide requirements for accessible or adaptable new homes through the application of the optional Building Regulations. The need is justified and evidence shows that viability would not be affected.¹¹⁹ The policy helpfully clarifies the type of development to which this policy would apply. In short, it would relate to all dwellings created via works to which Part M Volume 1 of the Building Regulations applies.

271. The policy encourages the use of conditions to secure its provisions, as necessary. Policy D3 confirms that inclusive design needs to permeate the design process. In that context, the inclusion of model conditions, which clearly indicate the number of dwellings per size typology, is a helpful and practical addition.

272. The policy will help to minimise disadvantage experienced by many disabled and older people, which would assist in meeting the specific needs of those groups who share a protected characteristic. In ensuring the provision of high quality housing the imperative of increasing well-being and health of Londoners is assisted.

Conclusion

273. Subject to our recommendations, policies D4 and D5 would effectively assist in the delivery of high quality homes that meet the needs of all Londoners.

Would the design led approach promoted in the Plan be effective in assisting the delivery of high quality places and optimising the capacity of sites, in accordance with the principles of Good Growth?

Design led approach

274. Further suggested changes have amalgamated policies D1, D2 and D6. Four policies now replace the previous three policies.

275. This suite of policies provides a sequence of considerations to assist in the delivery of well-designed development, at an appropriate density, that responds to local character, form and infrastructure capacity. They are aimed to put design at the core of plan making and decision taking. In short, they require boroughs to determine a local plan's spatial strategy to meet its

¹¹⁸ London Housing Design Guide Interim Edition 2010.

¹¹⁹ NLP/VI/001 and Mayor's statement.

growth requirements based on a thorough understanding of the character of the plan area. Identified infrastructure deficiencies should be addressed and optimised site capacities established for all site allocations and other development proposals, through the exploration of design options.

276. Requiring boroughs' plans to determine the capacity of allocated sites would provide an opportunity for community involvement. It would also provide more certainty to developers by providing clear parameters for future schemes. Ensuring a Plan's overall spatial strategy and individual site capacities are based on adequate supporting infrastructure will assist in the delivery of sustainable development. It would also assist in the identification of locations that may be suitable for tall buildings through the Plan making process.
277. Concern was expressed that the requirement for an area assessment would be a lengthy process, thereby unreasonably delaying local plan production and development management decisions. However, requiring boroughs to address these issues at the start of the plan making process will mean that at the development management stage there will be a solid evidence base in place on which to make decisions. This in turn should assist in quality and speed of decision-making. As over half of boroughs have already produced a characterisation study for their areas, we are not convinced that these requirements would impede the delivery of development
278. The use of characterisation studies to inform borough's policy formulation, however, is more limited. The Plan's approach would require greater use of that valuable information source to inform policy. It is appreciated that this would require the allocation of resources within boroughs. Coverage of this type of borough level study to date indicates that many boroughs have made resources available. However, in recognition of this widespread concern and to assist in effectiveness, the Mayor has put in place support and funding to assist boroughs.
279. Although the policies are long, complex, detailed and repetitious in places, as a suite they are navigable and thorough. The further suggested changes clearly demonstrate the link between the production of plan area assessments and their use in policy formulation, which provides welcome clarity.
280. One of the main features of this suite of policies is that in seeking to optimise capacity it dispenses with the "Density Matrix", used to guide site density. That was first devised in the late 1990s and has been included, in different guises, in previous Plans since 2004. This is a source of regret to many and there is particular concern that its loss will lead to less certainty as well as over-bidding for land. However, it would fundamentally conflict with the design led approach now advocated, which bases density on local context, infrastructure capacity and connectivity. This approach sees density as an output and not as an input that should determine the form and type of new development. Dispensing with the "Density Matrix" is therefore logical and justified as part of the overall design led approach.
281. Further factors support dispensing with the "Density Matrix". The evidence is that about half of developments permitted since 2004 have been outside the matrix ranges, thereby casting doubt over its effectiveness. First hand

evidence was also given that it has little bearing on the price paid for sites. Indeed, market forces and national policy constraints across London have had a greater effect on land supply. Enforcing a strict upper limit on density runs the risk of stymying otherwise acceptable development which would run contrary to the strategy of Good Growth. This supports the approach adopted, which would set density on the basis of local context.

282. Policies that enshrine the design-led approach set out a strategic direction although much of the burden for implementation will fall on the individual boroughs. Nevertheless, they provide a legitimate and justified approach with the potential to provide greater certainty. We deal with the details of individual policies, as necessary, below.

Character and capacity for growth

283. Policy D1 part A sets a requirement for boroughs to undertake area assessments to define the characteristics, qualities and value of different places within the plan area. D1 part A includes a list of considerations on which such studies should be based. This includes demographic make-up and socio-economic data, which ensures that studies go beyond the physical environment considerations. Further suggested changes include views and landmarks, which given their role in defining the character of an area is justified. Overall, the matters set out are a justified set of urban design considerations.

284. D1 part B requires boroughs to prepare local plans to meet their growth requirements, including their overall housing targets, using the plan area assessments to identify suitable locations for growth and its potential scale, whether limited, moderate or extensive. This should take account of existing and planned infrastructure capacity with a requirement to plan to address deficiencies. It also requires, the consideration of design options for strategic sites to set development parameters, which will determine the capacity of allocated sites. These considerations are necessary to ensure that the ambitious growth agenda in this Plan is realised.

Infrastructure requirements

285. Subsequent policies relate to the site-specific context. Policy D1A seeks to ensure that density of development proposals respond to future infrastructure capacity and that it should be proportionate to a site's accessibility and connectivity. Policy D1A part D introduces further suggested changes that set out explicitly that infrastructure capacity ultimately will limit the scale of development where it cannot be enhanced to mitigate the impact of development. This will ensure that the density of a development cannot exceed a sustainable level, even if it is acceptable in design terms. It will also help to ensure that development accords with Good Growth.

Optimising site capacity

286. Policy D1B seeks to optimise site capacity through following the design led approach in development proposals including site allocations. It sets out the design outcomes that well-designed places should seek to deliver. The list of outcomes cover the key urban design considerations under headings of form

and layout, experience and quality and character. Further suggested changes include the need to take account of circular economy principles which is a key theme in the Plan. Optimising site capacity does not mean maximising capacity, and this is made clear in the supporting text as is the fact that some uses inevitably require lower densities. Rather, optimising in this context means ensuring that the development takes the most appropriate form for the site and that it is consistent with relevant planning objectives and policies. This clarification, provided through further suggested changes, is necessary to ensure that the policy is readily understood and effective.

287. The detailed expectations for measurements of density to be provided have no place in the policy and further suggested changes rightly remove these from policy to the supporting text. Further suggested changes also delete the requirement to submit a management plan for residential development above certain thresholds, which is necessary as the requirements are unduly onerous given that costed plans are unlikely to be known up front. Indeed, the research project on which this provision is founded acknowledged the difficulty of writing policies in this respect and advised that it should be done in supplementary planning guidance. However, the policy should not prescribe that applications that unjustifiably fail to optimise capacity should be refused as that can be assessed on an individual basis. As such, this should be deleted [**PR19**].

Delivering good design

288. Policy D2 focusses on the process of ensuring that good design is delivered and retained. In setting out clear expectations of the design and application process, including its scrutiny through design review, it provides clarity to both developer and boroughs. The policy considerations are integral to achieving and maintaining good design and have a legitimate place in this Plan. Given the variation in borough design review practices at present, this policy, based on good practice principles¹²⁰, will help develop consistency and achieve policy aims. Whilst it is prescriptive it provides adequate flexibility for local definition.

289. Measures for retaining design quality through to completion are set out in policy D2 part E. As these in the main relate to good practice principles, they are justified as a measure to ensure design quality. Reference to securing the ongoing involvement of the original design team to monitor the design quality, would be a legitimate way to assist in the delivery of design quality, being established practice for some boroughs. The detailed wording of D2 part F4 and the supporting text would allow local flexibility. However, the use of an architect retention clause would be overly onerous and this should be deleted from the supporting text [**PR21**].

Conclusion

290. Subject to the recommendations set out above, the design led approach promoted in the Plan, through policies D1, D1A, D1B and D2 provides a framework that would enable the most appropriate form of development, that responds to the site's context and capacity for growth, existing and future supporting infrastructure capacity. It would be effective in assisting the

¹²⁰ Design Council, Commission for Architectural and Built Environment, landscape Institute, Royal Town Planning Institute and Royal Institute of British Architects.

delivery of high quality places and optimising the capacity of sites, in accordance with the principles of Good Growth.

Would policy D3 effectively assist the delivery of high-quality design that meets the needs of all?

291. Building on the design led approach, policy D3 seeks to embed an inclusive design approach into borough's plan making and development proposals. An inclusive environment is one that can be accessed and used by everyone, recognising and accommodating differences in the way people use the built environment¹²¹. The focus of the policy accords with national guidance¹²², in seeking to break down unnecessary physical barriers and exclusions caused by poor design of buildings and spaces. It would support the achievement of other objectives of the Plan, such as high quality design, social cohesion, crime prevention and security measures, to name a few.
292. The policy addresses, through further suggested changes, the requirement for the built environment to facilitate social interaction and inclusion, which would assist in building strong and inclusive communities. Through the same mechanism, it recognises that many factors that influence potential barriers can be mitigated by ensuring the involvement of target groups and local communities in policy formulation and planning decisions that affect them. This is necessary and accords with national guidance¹²³.
293. Policy D3 part A through to D3 part A3 ensure that the approach is embedded in designing development proposals, promoting the highest standards of accessible and inclusive design in high quality, people focussed spaces designed for social interaction and inclusion. This provides appropriate flexibility to take account of changing accessibility standards and for local decision making. Assistance from the Mayor for boroughs and other agencies in implementing the approach is confirmed by the provision of support and guidance where necessary. This would ensure that boroughs have the skills and resources in place to ensure effectiveness.
294. Policy D3 part B seeks an inclusive design statement, as part of design and access statements, proportionate to the type and scale of development proposed. The supporting text clarifies what should be addressed, including setting out the potential impacts of the development proposal on people and communities who share a protected characteristic. By ensuring that equality issues are at the core of the design process, the policy would have especially positive impacts for older people and those with mobility difficulties.

Conclusion

295. Overall, policy D3 would be effective in assisting the delivery of high-quality design that meets the needs of all Londoners.

¹²¹ PPG ID-26-012-20140306.

¹²² PPG ID-26-012-20140306.

¹²³ PPG ID-26-012-20140306.

Would the Plan's policies effectively assist in delivering high quality public spaces that meet the needs of all?

296. The public realm covers a significant part of London and is at the core of planning for a healthy, inclusive and prosperous city. The Mayor is responsible for the management and maintenance of much of the public realm through Transport for London and its management is an important part of the *Mayor's Transport Strategy*¹²⁴. This is essential to encouraging cycling and walking, improving people's health and reducing vehicle traffic in support of Good Growth. In addition, the provision of new public realm is anticipated to be delivered to a large extent through large scale private development. For all these reasons, whether due to Mayoral responsibilities, or as a result of new development, a consistent approach to altered or new public realm is essential in this Plan. In addition, addressing these issues would accord with national policy¹²⁵.
297. Policy D7 sets out a framework of urban design principles for development affecting the public realm. It is long and complex, including some fifteen clauses. Whilst it could be shorter, with a punchier style, this does not go to the heart of soundness. Further suggested changes introduce a clause, D7 part AA, to encourage opportunities to create new public realm where appropriate. This is justified given the growth agenda in this Plan and the role of new development for its delivery.
298. D7 part A through to D7 part M set out detailed urban design principles, which provide coverage of the main considerations that will deliver high quality public realm, along with the issues that will help to deliver the Mayor's other strategies and meet his other responsibilities. They include appropriate flexibility for local policy making based on local context. Although detailed, they generally focus on matters that require a strategic approach. For example a strategic approach to the provision of water fountains, as set out in policy D7 part M is necessary to deliver the imperatives of the circular economy and meet the Plan's waste objectives. A strategic approach to street clutter and street furniture, as set out in D7 part IA, is justified given the Mayor has a strategic role in the management of London's public realm and has responsibility to ensure that street furniture and other items do not intrude on public spaces or impede access to and use of the public realm.
299. Provisions also promote the consideration of the maintenance and management of the public realm at design stage, which will help to ensure lifelong considerations are embedded in the design process. Together, they will assist in the provision of public realm that is well designed, safe, inclusive and accessible, amongst other urban design good practice principles. Further suggested changes seek to ensure that light pollution is considered at the design stage of public realm. Given the potential intrusive effect of light pollution, its inclusion is justified. Other further suggested changes include wider microclimate considerations in D7 part I and the incorporation of street trees in D7 part H, which are justified given their role in enabling high quality public realm design.

¹²⁴ NLP/TR/001.

¹²⁵ NPPF paragraphs 57 and 58.

Conclusion

300. When read alongside the other design policies that will ensure locally distinctive and inclusive design, the policy D7 would effectively assist in delivering high quality public spaces that meet the needs of all Londoners.

Would the Plan's policies effectively assist in delivering tall building development in the right place at the right height so as to positively contribute to London's rich character?

301. Whilst high density does not necessarily imply high rise, tall buildings can contribute to facilitating regeneration opportunities, creating new homes and economic growth. They have a legitimate place making role in a capital city in the right place and at the right height. However, recent tall building development and the sheer numbers in the pipeline in London are at the root of considerable concern to some^{126 127}.

302. Through the design led approach, set out in policies D1 to D2, boroughs are required to use plan area assessments to identify areas of growth, including areas with potential for tall building development. Policy D8, further develops that policy framework requiring boroughs to identify locations for tall buildings and maximum building heights within local plans, taking account of the visual and cumulative impacts of tall building development and engaging with neighbouring boroughs that may be affected. Given their potential impact, a plan led approach to tall building development is legitimate. It accords with national policy¹²⁸ and advice on tall building development¹²⁹ and provides opportunities for community engagement. A policy of constraint, which seeks identification of areas sensitive to tall building development, would be at odds with the design led approach promoted and would not provide the necessary strategic direction promoted by that suite of policies.

303. Policy D8 requires boroughs to provide a local definition of what constitutes a tall building. Given the diverse character of areas across London, both within and between boroughs, this is a legitimate approach. It would ensure that development responds appropriately to local context and takes account of boroughs with lower level development and/or significant constraints on tall building development. If a London wide definition were to be used, if too high it would run the risk of allowing harmful development, if too low it would run the risk of delaying or preventing acceptable development. The proposed approach would be in accordance with national advice¹³⁰ providing a finer grained approach to assist in ensuring tall building development is focussed where it would contribute positively to the character of London. Until boroughs have a local definition in place, the policy provides a London wide one. The use of the threshold height for referral of planning applications is readily understood, logical and justified. This would ensure that the application of the policy is effective immediately. Indeed, the overall approach

¹²⁶ NLP/AD/45.

¹²⁷ NLP/AD/103.

¹²⁸ NPPF paragraphs 17 and 154.

¹²⁹ NLP/AD/110.

¹³⁰ NLP/AD/110.

would engender more certainty in the development process, rather than land price speculation and uncertainty.

304. The previous iteration of the Plan included, within policy, an indication of locations which may have potential for tall buildings, i.e. in the CAZ, opportunity areas, areas of intensification or town centres that have good access to public transport¹³¹. A similar strategic steer in this Plan was called for. However, the Plan's approach, would provide a more locally defined, strategic and comprehensive policy framework. Nevertheless, it is likely that the proposed approach would focus tall building development in locations that have opportunity for significant change, which are likely to coincide with those areas indicated in previous iterations of the Plan. In any event the Mayor will still have a strategic role in assessing referable applications, which will capture all tall buildings above the height threshold¹³² and assist in providing consistency of approach across London.
305. By requiring the identification of locations with potential for tall building development in development plans, many of the impacts will have been addressed at plan making stage, which, rather than delay acceptable development would be likely to speed up its delivery and provide more for developers. The Mayor has committed to providing a strategic overview of tall building locations across London, using 3D virtual reality modelling to aid the production of the evidence base and public engagement, funding and resources to assist boroughs in implementing this policy. This will assist boroughs in ensuring that the necessary advice and expertise are in place.
306. Policy D8 also includes evaluation criteria, which can be used immediately by boroughs to assess tall building proposals and refine their strategic approach. They provide an extensive list relating to visual, functional, environmental and cumulative impacts. These consider different parts of a tall building in slightly different ways, which will focus evaluation equally on the varying potential impacts, rather than just skyline. They are not exhaustive and other impacts may need to be considered. Whilst many replicate considerations already in national advice¹³³, the list is long, and the matters prescriptive and sometimes complex, we consider that together, the criteria comprise a London expression of national advice. They cover the relevant urban design considerations and all have a legitimate place in this Plan. Performance thresholds for relevant criteria are more appropriate in supplementary planning guidance and boroughs could develop these if locally necessary and justified, in any event. Overall, the criteria are justified and provide the necessary level of flexibility for borough adaptation to fit local circumstances.
307. This policy forms part of a novel and ambitious approach, and given the potential impacts of tall building development and for local variation in policy application, mechanisms to monitor this policy are essential. We are satisfied that they are.

¹³¹ Policy 7.7 The London Plan 2016.

¹³² 25 metres in height in the Thames Policy Area and 30 metres in height elsewhere.

¹³³ NLP/AD/110.

Conclusion

308. The Plan's policies would effectively assist in delivering tall building development in the right place at the right height, so as to positively contribute to London's rich character.

Would policy D9 be effective in assisting the control of the negative effects of large scale basement development? Is it necessary, and would its provisions be effective?

309. Large scale basement development below existing buildings has increased over recent years and the location of such development is widespread across London¹³⁴. In addition, there are potential cumulative impacts of such development, including land and structural stability, localised flooding and drainage, noise and vibration and disturbance to residents. These cumulative impacts could cross borough boundaries and could negatively affect the London Underground network, managed by the Mayor, through cumulative acoustic and structural impacts. For all these reasons, basement development under existing buildings is a strategic matter of London wide importance, rightly addressed in this Plan.

310. Policy D9 requires boroughs to establish policies to address the negative impacts of large scale basement development. Large scale basements are defined within the supporting text along with the issues that should be considered when drawing up policies in plans. Further suggested changes clarify the need for policies where this is identified as an issue locally. This provides an appropriate level of flexibility to reflect local circumstances.

311. However, modification is required to ensure that policies are developed through development plans [**PR22**]. Subject to our recommendation, policy D9 would be effective in assisting to address the negative effects of large scale basement development. It would be necessary and its provisions effective.

Would policies D10 and D11 effectively assist in promoting safe, secure and resilient environments and help ensure the highest standards of fire safety in new development?

Safety, security and resilience to emergency

312. The safety of residents and those working in and visiting London are critical considerations when planning for new development. Planning strategically for safety, security and resilience to emergency is essential, given the cumulative impact on the all parts of the capital.

313. Policy D10 seeks to ensure that boroughs work collaboratively with critical agencies including with the Metropolitan Police, Design Out Crime officers and planning teams, to identify community safety needs, policies and sites to support provision of necessary infrastructure and reduce the fear of crime. This would accord with national policy¹³⁵. The range of threats addressed are a broad reflection of those that would affect the built environment and as it is not an exhaustive list, it is reasonable and justified. In addition, it seeks to

¹³⁴ Oral evidence of Mayor's team morning hearing session 6 March 2019.

¹³⁵ Paragraph 58 and 69 NPPF 2012 and PPG ID: 26-010-20140306.

ensure that new development maximises building resilience to emergency, and minimises potential physical risks, such as fire and flooding, by giving these matters consideration at the start of the design process. This is necessary to ensure that development is inclusive and aesthetically integrated into the wider area. Further suggested changes ensure that extreme weather events are considered, which given the recent trend in climate events and their potential impact, is justified.

314. However, D10 part A, lacks clarity. Modification is required to ensure that the policy expresses exactly what boroughs should do, through development plans, in terms of policy and any allocations for necessary infrastructure [PR23].

Fire safety

315. Policy D11 seeks to promote consistency in the application of the highest standards of fire safety in new development, setting out the need for fire and safety considerations to be considered together, on an equal footing. This is necessary to ensure that the requirements of fire safety and crime prevention do not conflict. With this helpful clarification, policies D10 and D11 would work together to promote safe and secure new development across London that represents Good Growth and meets the aims of both policies.

316. The matter of fire safety compliance is covered by Part B of the Building Regulations. However, policy D11 requires that matters of fire safety are considered at initial planning stage to embed fire safety concerns within the planning and design process. It will avoid them being considered in isolation after development parameters are set. Such an approach accords with the findings of the Hackitt Review¹³⁶. In addition, it provides the necessary flexibility to align with the direction of travel of Government's response¹³⁷, in particular its intention to introduce specific "gateway" points that reflect every part of a building's life, including planning, design, completion and occupation as part of a new improved regulatory framework.

317. D11 part A sets out development criteria which can be immediately applied at a local level. Focussing on aspects of development that need to be considered at planning stage, such as site access, layout and impact on fire appliance arrangements and evacuation, along with measures to reduce fire spread, is justified. In requiring the highest standards of fire safety, it provides adequate flexibility to reflect any change in standards.

318. Policy D11 part B, requires major development to be supported by an independent fire strategy, produced by a third party suitably qualified assessor. This will ensure that a fire and evacuation strategy is in place, which considers matters relevant to major development, such as the layout and use of buildings and the number, location and design of vertical cores. This will enable the planning system to protect and maintain areas to be used for fire safety purposes and aligns with the findings of the Hackitt Review and the Government's response.

¹³⁶ MHCLG Building a Safer Future: An Independent Review of Building Regulations and Fire Safety Final Report May 2018.

¹³⁷ MHCLG Building a Safer Future: An Implementation Plan December 2018.

Conclusion

319. Subject to our recommendations, policies D10 and D11 would effectively assist in promoting safe, secure and resilient environments and help ensure the highest standards of fire safety in new development.

Would the Plan's policies, dealing with the agent of change and noise, strike the right balance between supporting new development, protecting existing uses and delivering Good Growth?

Agent of change

320. The agent of change principle places the responsibility for mitigating impacts from existing noise or other nuisance generating activities or uses on the proposed new noise-sensitive development. Meeting London's development needs and making the most efficient use of land to meet the growth anticipated within this Plan will require development to be located next to existing uses, and indeed some policies explicitly require this (policies H1 and E7 encourage housing on industrial sites). Further, policy D12 expresses the planning implications of the *London Environment Strategy*, which recognises that meeting London's development needs requires a strategic approach to the management of noise and other nuisances¹³⁸. These considerations justify the Plan's approach, which would also accord with national policy¹³⁹.

321. Policy D12 part A, however, explains what the agent of change principle is, as a standalone statement of fact, rather than a policy. For this reason, it should be combined with D12 part B, which clearly sets out what boroughs are expected to do to implement this principle [**PR24**].

322. Policy D12 parts D and E set out the implications of the agent of change principle for existing and proposed development. They clarify that the policy includes noise and other noise generating uses, which accords with national policy and is justified given identified development needs¹⁴⁰. Policy D12 part EA sets out ways in which noise and other potential nuisances should be managed. In referring to other potential nuisances, it would accord with national policy and given the earlier considerations is justified¹⁴¹. Policy D12 part F, in setting out that development proposals should be refused, does not provide adequately for local decision making. Modification is therefore required [**PR25**].

Noise

323. In setting out specific approaches to the design of new development, policy D13 part A would enable a consistent approach. It is a logical list of considerations to address noise matters and deliver good design. In this

¹³⁸ NLP/SI/025.

¹³⁹ Paragraph 123 NPPF and paragraph 182 NPPF 2019.

¹⁴⁰ Paragraph 123 NPPF and paragraph 182 NPPF 2019.

¹⁴¹ Paragraph 123 NPPF and paragraph 182 NPPF 2019.

respect, the approaches would accord with national policy and guidance and are logical and justified¹⁴².

324. Policy D13 part B requires boroughs to identify and nominate new quiet areas and protect existing ones. As London's population grows and the urban environment becomes denser, the retention of quiet areas throughout the City will become increasingly important to ensure quality of life. The general concept would accord with national policy¹⁴³, refers to the relevant guidance¹⁴⁴ and ensures that such designations and policy imperatives are based on local context.

325. Further suggested changes will ensure consideration of existing noise sensitivity to minimise potential conflicts including with noise sensitive wildlife, parks and green spaces and traffic noise and pollution. Whilst the policy as a whole could be more proactive, in identifying areas of noise pollution and addressing its impacts for example, this does not go to the heart of soundness and would not preclude boroughs from taking a more proactive approach if locally justified.

Conclusion

326. Subject to our recommendations, policies D12 and D13, dealing with the agent of change and noise, strike the right balance between supporting new development, protecting existing uses and delivering Good Growth.

Would the heritage and culture policies in the Plan assist in preserving and enhancing London's historic environment, its cultural facilities and creative industries and, in this regard, would they provide an effective strategic context for the preparation of local plans and neighbourhood plans? Are the policies and their detailed criteria justified and necessary and would they provide an effective basis for development management?

Heritage conservation and growth

327. Policy HC1 builds on the design-led approach promoted in policies D1 to D2, to ensure that the significance of heritage assets informs change. In requiring boroughs to develop a clear understanding of the historic environment, it will assist in heritage value informing the preparation of development plans and strategies. In setting out the nature of evidence that boroughs should develop and a range of potential sources, it provides a clear link to policy formulation, with the overall aim to embed the role of heritage in place making and regenerative change. That includes a recognition of the economic benefits of the approach promoted, in accordance with national policy¹⁴⁵. Further suggested changes will ensure that all stakeholders, including local communities, are an integral part of this process.

328. The policy appropriately addresses the need to identify and value heritage assets and sets out a common approach to avoid harm, in the first instance, in

¹⁴² NPPF paragraph 123.

¹⁴³ NPPF paragraph 123.

¹⁴⁴ DEFRA's Noise Action Plan for Agglomerations 2014.

¹⁴⁵ NPPF paragraph 131.

accordance with national policy¹⁴⁶. Together with the glossary definitions of heritage assets and historic environment, it provides an effective framework for development management, within which the heritage balances for designated and non-designated heritage assets set out in national policy can be undertaken¹⁴⁷. Its approach to archaeology, accords with national policy¹⁴⁸, along with its approach to heritage assets at risk from neglect, decay or other threats¹⁴⁹.

329. The policy considers those aspects of the environment resulting from the interaction between people and places through time and all surviving physical remains of past human activity. This would include considerations of the impact of past human cultural activity from all sections of London's diverse community.

World Heritage Sites ("WHS")

330. Policy HC2 actively responds to the findings of the *International Council on Monuments and Sites/International Centre for the Study of the Preservation and Restoration of Cultural Property Mission Report*¹⁵⁰, which concluded that the current Plan had not been totally effective in preventing negative impacts on the outstanding universal value of London's WHS, particularly in relation to the Palace of Westminster. London has four WHS¹⁵¹, which are not only a key feature of London's identity as a major city, but amongst the most important cultural heritage sites in the world. For these reasons, a bespoke policy in this Plan is justified.

331. Supported by the Mayor's supplementary planning guidance¹⁵², this policy requires those boroughs with WHS and their neighbours, through their development plans and development management, to conserve, promote, actively protect and interpret the outstanding universal value of WHS. Endorsing these internationally significant heritage sites, along with United Nations Educational, Scientific and Cultural Organisation ("UNESCO") endorsed methodologies to protect outstanding universal values, will assist boroughs in formulating effective development plan policies and development management practices and would accord with national policy¹⁵³.

332. The supporting text includes a commitment to include advice on the relationship between setting and buffer zones in supplementary planning guidance. As setting is a wider definition than buffer zone and not all WHS in London include buffer zones, this approach is proportionate and justified. It is not necessary to refer to potential WHS in this policy. If sites are inscribed¹⁵⁴ in the future, the policy will come into effect. The role of the London View

¹⁴⁶ NPPF paragraph 126.

¹⁴⁷ NPPF paragraphs 132-135.

¹⁴⁸ NPPF paragraph 139.

¹⁴⁹ NPPF paragraph 130.

¹⁵⁰ NLP/HC/021.

¹⁵¹ Maritime Greenwich, Royal Botanic Gardens Kew, Palace of Westminster and Westminster Abbey, including St Margaret's Church and the Tower of London.

¹⁵² NLP/HC/023.

¹⁵³ NPPF paragraphs 132 and 138.

¹⁵⁴ Added to the World Heritage List by the World Heritage Committee.

Management Framework ("LVMF") in the protection of outstanding universal values is considered below.

Strategic and local views and LVMF

333. Policies HC3 and HC4 set out well established policies in previous iterations of the Plan, which seek to protect and enhance the composition and character of London's strategic and local views and their landmark elements, through the application of the LVMF. This identifies 27 strategic views with 61 assessment points. Evidence suggests that the LVMF has generally been effective in managing London's protected views¹⁵⁵. Convincing evidence for the identification of additional views was not presented.

334. Whilst the geographic extent of local views is limited, they are often to strategically important landmarks, cross borough boundaries and cumulatively they make a significant contribution to the appreciation of London's character. Therefore, local views can be a strategic matter, and are rightfully considered in policy HC3. Further suggested changes clarify that local views should be managed using the principles set out in the LVMF. This will ensure consistency of approach, which will be particularly effective when cross borough view management is required, correctly leaving the weight to be attached to the matter to the local decision maker.

335. Supporting opportunities to reinstate Landmark Viewing Corridors arising as a result of redevelopment is an important part of the Mayor's approach to protecting heritage set out in policy HC4. Such an approach is consistent with national policy¹⁵⁶, which seeks new development that makes a positive contribution to local character and distinctiveness. Further, it would help to enhance or better reveal the significance of heritage assets¹⁵⁷.

336. As policies HC3 and HC4 promote the identification of views through development plans, this would provide the opportunity for engagement with local communities. Technical matters relating to the management of views, including on the production of verified views would be addressed in supplementary planning guidance. Such an approach accords with national policy¹⁵⁸, which sets out that supplementary planning documents should be used where they can help applicants make successful applications. This is an appropriate vehicle for dealing with detailed technical matters and would be a reasonable and proportionate approach. There is no convincing evidence of the requirement for further designated views.

Culture and creative industries

337. Policy HC5 sets a framework, for specific support for culture and creative industries through development plan policy and planning decisions. It encourages a local understanding of the existing cultural offer and evaluation of needs to inform development plan policy. This is an important aspect of the policy's approach and would help to ensure that the needs of all groups in the

¹⁵⁵ NLP/HC/014a; NLP/HC/014b.

¹⁵⁶ NPPF paragraphs 126, 131 and 137.

¹⁵⁷ Historic England, The Setting of Heritage Assets, Historic England Good Practice Advice in Planning Note 3 (second Edition) December 2017.

¹⁵⁸ NPPF paragraph 153.

community were addressed. Such an approach provides the flexibility for boroughs to compile a locally appropriate evidence base, in accordance with national policy¹⁵⁹. For these reasons, the requirement for a local understanding of the existing cultural offer and the development of policies to protect it where justified should be included within policy as it is currently deficient in this respect [**PR34**].

338. As policies should be developed through the development plan process, an opportunity for public engagement would be provided. In encouraging boroughs to define their cultural offer locally, a Plan definition of culture is not required. A non-exhaustive list of London's rich cultural offer is included in the supporting text, making a clear link with cultural tourism and its social role. Together with other policies in the Plan, it would provide support and protection for food industries and a framework for local decision making for a major entertainment venue, as part of London's cultural offer. Specific mention of these cultural offers are not therefore required in policy.

Night time economy

339. Policy HC6 builds on the *Culture for all Londoners* and *A Vision for London as a 24 hour City*. Those promote a 24 hour economy, seek to protect London's cultural assets and maintain London's unique offer. Policy HC6 promotes the growth and diversification of the night time economy, in particular strategic areas identified through the Plan's town centre network, supporting an integrated approach to its management, to address any adverse impacts. Together with other policies in the Plan, it would be effective in that aim and through the application of policy D3, would enable inclusive environments¹⁶⁰.

340. Further suggested changes will help address the adverse environmental impacts of the night time economy in line with the precautionary approach set out in national policy¹⁶¹.

Public houses

341. Policy HC7 provides protection for public houses which have heritage, economic, social or cultural value for local communities and support for new proposals. Public houses contribute to London's rich built, social and cultural heritage. They fall within the definition of main town centre uses contributing to a centre's vitality and viability¹⁶² and generated in the region of 46,000 jobs in 2016¹⁶³. They support a wide range of cultures and provide a particular focus for some groups that represent London's diversity such as the LGBTQ+ community¹⁶⁴. There is convincing evidence of the significant loss of public houses across London in recent years¹⁶⁵ with a consequent impact on their heritage, social, economic and cultural role. Further, the Mayor's *Culture for all Londoners*, identifies public houses as cultural facilities and provides strong support for a pro-culture Plan¹⁶⁶. For all these reasons, and to ensure a

¹⁵⁹ NPPF paragraphs 7, 21 and 23.

¹⁶⁰ Policies D12 Agent of Change; D13 Noise; T4 Transport; SD6 Town Centres and high streets.

¹⁶¹ paragraph 170 NPPF 2019.

¹⁶² NPPF Annex 2.

¹⁶³ NLP/HC/004.

¹⁶⁴ Just Space oral evidence afternoon hearing session 8 March 2019.

¹⁶⁵ NLP/HC/004.

¹⁶⁶ NLP/HC/020a.

consistent approach with the Mayor's other strategies, a bespoke policy providing some protection for public houses is justified. This is the case even though public houses are not a focus for all sections of the community, and recognising that they revolve around alcohol, are not a focus for some groups.

342. The policy requires the loss of public houses, protected by the policy, to be supported by robust marketing evidence. This would ensure that there is no realistic prospect of the building being used as a public house in the foreseeable future and would protect against the redevelopment of associated accommodation, facilities and development within its curtilage. The policy sets out criteria against which boroughs can assess whether a public house should receive protection or not. Those criteria are not exhaustive and recognise the role played in catering for one or more specific group, which would include the LGBTQ+ community.
343. The policy as a whole, appropriately reflects the dual pressures of closure and threat of redevelopment to public houses. Further suggested changes clearly set out the role for development plans and development management, ensure that the relocation or replacement of a public house is considered only where the loss of an existing public house is considered acceptable, and require measures to ensure the future viability of a public house as part of any redevelopment of associated accommodation, facilities or development within the curtilage of a public house. In this respect, the policy would be effective.
344. Convincing evidence was presented to indicate that LGBTQ+ community venues are disproportionately affected by closures. Protection for public houses would therefore represent a benefit to that group with protected characteristics.

Conclusion

345. The heritage and culture policies in the Plan would assist in preserving and enhancing London's historic environment, its cultural facilities and creative industries and, in this regard, provide an effective strategic context for the preparation of local plans and neighbourhood plans. The policies and their detailed criteria are justified, necessary and consistent with national policy. They would provide an effective basis for development management.

Would policies S1 to S7 assist in protecting London's social infrastructure and support its enhancement to meet the needs of London's diverse communities? Would they provide an effective strategic context for the preparation of local plans and neighbourhood plans? Are the policies and their detailed criteria necessary, justified and consistent with national policy and would they provide an effective basis for development management?

346. These policies, together, seek to ensure social infrastructure needs of existing and future communities are met. This is necessary to ensure that the supporting infrastructure is adequate for the planned increase in population, recognising the role that it plays in helping to support health and wellbeing.

Developing London's social infrastructure

347. Policy S1 is an overarching policy that enables boroughs to protect existing social infrastructure and support its delivery to meet the diverse needs of their existing and future populations. In doing so it supports a development plan approach and sets an overarching strategic steer for all types of social infrastructure, whilst subsequent policies set the requirements of specific types.
348. The Plan's approach is that developing social infrastructure, should be based on an understanding of what exists at present, future needs and the unique characteristics of boroughs' communities and should include cross boundary and community collaboration. It provides support for high quality, inclusive and accessible social infrastructure, that addresses local or strategic needs and sets out specific circumstances in which the loss of social infrastructure would be supported. In requiring cross borough collaboration it adequately addresses strategic and local needs.
349. The glossary provides a non-exhaustive list of those facilities that fall within the definition of social infrastructure. The term, social infrastructure is used within the policy in a way that broadly accords with that definition, and the policy focuses on the services and facilities that underpin it. Further suggested changes acknowledge the range of service providers, the informal networks and community support that make up the informal social infrastructure and clarify the role of this policy in enabling facilities and services to support it. As other policies in the Plan support Good Growth, which is sustainable development that will nurture the development of informal social infrastructure, the focus of the policy is justified.
350. As a development plan approach is supported, the opportunity for community engagement in the production of both evidence base documents and policy development would be assured and further suggested changes clarify this point. The policy encourages the co-location of facilities and includes enough flexibility for appropriate local interpretation and to accommodate those users, such as faith groups, for whom co-location would not always be an option. Further suggested changes reflect the need for appropriate local decision making and clarify, in the supporting text, what would demonstrate realistic proposals for re-provision, in the context of any loss. This is necessary to ensure that the policy is effective.
351. Boroughs are required to plan for their social infrastructure needs through development plans, infrastructure delivery plans and community infrastructure levy schedules. This is necessary bearing in mind the heavy reliance on new development to meet these needs. Supplementary planning guidance will provide more detail in this regard, including guidance on identifying funding and delivery. The mechanism to ensure that the capacity of infrastructure generally, which would include social infrastructure, meets the needs of planned growth is set out in Policy D1A, parts B and C. These, together, require boroughs to ensure sufficient infrastructure exists at the appropriate time. When read as a whole, the Plan would provide a justified strategic approach to the delivery of social infrastructure to meet the needs of its growth agenda.

Health and social care facilities

352. Policy S2 generally accords with the approach to planning for social infrastructure set out in policy S1. In addition, it sets out a requirement for boroughs to understand the impact and implications of health service transformation plans and new models of care and to plan for them accordingly. As some changes are likely to have significant land use implications, this is necessary.
353. As boroughs and health service providers, including the National Health Service, are subject to the PSED, there is no need to set out those requirements in this policy. As health inequalities are linked to disadvantage and discrimination and disproportionately affect poorer communities, and those with protected characteristics, requiring a needs assessment to inform development plan policy would provide an understanding of diverse community needs. It therefore would be likely to have positive benefits for those with protected characteristics.
354. The focus of this policy is on the integrated service delivery of health and social care facilities and services. The role of preventative health measures, relevant to a development plan, is acknowledged by further suggested changes, which outline the role of other policies in the Plan, which specifically address this. The Plan addresses the wider determinants of health through delivering good quality places and homes; access to employment, education, social infrastructure generally, green spaces and waterways, a healthier food environment and promotes sustainable modes of transport and improving air quality. The policy generally provides an appropriate level of flexibility for local implementation including policy S2 part A5, which requires identification of opportunities to make better use of existing and planned infrastructure.

Education and childcare facilities

355. Policy S3 generally accords with the approach to planning for social infrastructure through the development plan approach as set out in policy S1. In addition, this policy sets out criteria for assessing development proposals for education and childcare facilities. Further suggested changes ensure that needs assessments include an audit of existing facilities and that development plans identify future provision of all school places, including special educational needs and disability places. These changes are required to ensure that the policy is clear and effective.
356. We have been provided with recent examples of boroughs allowing the use of Metropolitan Open Land ("MOL") for educational facilities based on a sequential approach to site selection and detailed development criteria. However, the exclusion of this approach within the policy does not make it unsound. Its absence would not preclude boroughs from taking such an approach, where locally justified. Boroughs would still be able to balance educational needs against other material considerations. Whilst the Plan promotes a greater reliance on smaller sites, this would not necessarily prejudice delivery of education facilities, and the role for funding it through new development in the usual way through CIL and planning obligations, where appropriate.

357. Basic development requirements are included that generally express other policies in the Plan, including policy S1 and the Good Growth policies. Some are detailed in their requirements, but they provide a framework to enable a consistent approach across London, meeting the Plan's overarching approach to social infrastructure. They provide an appropriate strategic steer whilst enabling flexibility for local decision makers. Further suggested changes include an appropriate approach to ensure no net loss of education or childcare facilities, where it is demonstrated that there is no ongoing or future need and ensure consistency with national policy in relation to playing fields¹⁶⁷.

Play and informal recreation

358. Policy S4 enables boroughs to consider how the role and design of the built environment can create opportunities for children and young people to access play and recreation space. It requires them to plan positively for childrens' and young persons' play, and informal recreation provision and opportunities based on a needs assessment, which includes an audit of existing provision and involves consultation with the target population. It also includes a requirement to produce a strategy for play and informal recreation to address identified needs, supported by development plan policy.

359. This policy deals with a strategic matter of London wide importance and will help to ensure that play provision is addressed, particularly in areas of significant growth. The approach taken is justified given the growth agenda proposed in the Plan, which includes an expected increase in the number of children between 6-8 of around 370,000 (2016-2041)¹⁶⁸, recent trends in childhood inactivity¹⁶⁹ and obesity rates within London's child population which, are significantly higher than those of England as a whole¹⁷⁰.

360. The provision of formal play opportunities is just one mechanism to address identified needs. Play opportunities can be realised through street design and layout, and measures such as separating links between spaces for play and informal recreation and busy roads and traffic. To enable neighbourhoods to become more child friendly, the requirement for a strategy on play and informal recreation is justified and would help to address identified deficiencies and future needs. The policy includes a suitable level of flexibility as to how play provision is assessed and met at a local level through further suggested changes.

361. The policy sets out criteria against which development proposals that are likely to be used by children and young people should be assessed. This includes the requirement to increase opportunities for play and informal recreation, enable children and young people to be more independently mobile and ensure no net loss, unless it is demonstrated that there is no ongoing or future demand. These are reasonable and justified, in as much as they would help deliver more child friendly neighbourhoods to meet policy aims.

¹⁶⁷ NPPF paragraph 74.

¹⁶⁸ NLP/DEM/001.

¹⁶⁹ NLP/CD/02.

¹⁷⁰ NLP/CD/02.

362. For residential development it sets out criteria to help deliver safe and stimulating play provision, including a standard requirement per child. This standard has its origins in previous Plans, having been developed initially by Fields in Trust for outdoor play space. It was reassessed in 2012 and is based on robust evidence and extensive consultation. The standard is widely understood, has been applied for some time based on the Mayor's population yield calculator and it has generally delivered to date within Greater London¹⁷¹. Although local implementation has varied, the supporting text to the policy outlines that supplementary planning guidance will provide more detail on this benchmark and other implementation issues. This will include additional testing of the child yield calculator. If a review is necessary, supplementary planning guidance is the appropriate vehicle to deal with this level of detail.
363. For all these reasons and taking account of the growth agenda in the Plan, this benchmark standard is reasonable and is justified as a minimum requirement. It would provide a consistent approach across London and enable some flexibility, if locally justified. Further suggested changes would ensure that good quality accessible play provision for all ages is provided, is overlooked and unsegregated by tenure. The application of these criteria would exclude locations where provision would not be suitable and therefore specific exclusions are not required.

Sports and recreation facilities

364. Policy S5 requires boroughs to ensure a sufficient supply of good quality sports and recreation facilities, through both development plans and development management. It covers all facilities from local through to elite sports facilities, responding to convincing evidence that sports and recreation provision in the capital is not meeting demand¹⁷². It requires that policy is informed by needs assessments, carried out on a local and sub regional basis. Further suggested changes clarify that those assessments should be based on an audit of existing provision. These requirements are necessary to ensure that a borough's approach is based on a proportionate evidence base and that they have regard to open space provision assessments, which will ensure consistency with national policy and are justified¹⁷³.
365. Through development plans, the policy requires boroughs to secure sites for a range of sports and recreation facilities. Further suggested changes trigger this requirement when justified by a needs assessment. It requires boroughs to maintain, promote and enhance networks for walking, cycling and other activities to extend the catchment areas of existing and proposed facilities. By protecting existing facilities, including playing fields, increasing and enhancing provision in accessible locations, maximising the multiple use of facilities and encouraging co-location through boroughs' development management functions, this policy will help to ensure the best use of existing and proposed facilities. Further suggested changes will ensure that any loss of facilities is based on a local and cross borough assessment.

¹⁷¹ Mayor's oral evidence afternoon hearing session 5 May 2019.

¹⁷² NLP/SO/001; NLP/SO/002; NLP/SO/003.

¹⁷³ NPPF paragraph 73.

366. To ensure that an appropriate balance is struck between the protection of green open spaces and provision of sports facilities, and consistency with national policy¹⁷⁴, further suggested changes are necessary. Whilst no mention of elite sports facilities is included in the policy, its contribution to London's sports and recreation facilities is set out in the supporting text. Any proposals for these facilities would fall for consideration against the provisions of this policy.

Public toilets

367. Policy S6 sets out a strategic framework for boroughs to require the provision and future management of free publicly accessible toilets, as part of large scale development open to the public and as part of large areas of public realm. In so doing it aims to provide a more consistent distribution of publicly accessible toilets suitable for a range of users, including people with disabilities, families with young children and people of all gender identities, in places where people will spend long periods of time. It will ensure consistency of approach and facilitate effective partnership working that the Mayor considers necessary to deliver Good Growth. On this basis, we accept that this is a matter of strategic importance to Greater London and appropriate for inclusion in the Plan.

368. In implementing this policy, each borough, is required to adhere to the PSED. The policy would help those for whom their ability to travel around London and take an active part in public life is limited by access to suitable toilets. It will therefore help to eliminate discrimination, for different groups in society, including those with protected characteristics.

369. Enabling boroughs some flexibility to define when this policy bites, would strike the right balance between prescription and enabling appropriate implementation. Setting prescriptive thresholds for types of toilets would include an inappropriate level of detail and would be unnecessary given the relevant British Standard, which prescribes the number of toilets in particular locations. Notwithstanding this, further suggested changes to the supporting text require consideration of capacity to avoid queuing, particularly where female gender specific toilets are provided. Specifying 24 hour access from the public realm and access during opening hours elsewhere, seems a reasonable approach to ensure the policy is meeting its aim.

370. The community toilet scheme would be unlikely to provide for the range and accessibility of facilities to meet the policy aims. However, encouraging its use in smaller developments will complement the requirements of policy S6. Further suggested changes will ensure clarity in the provisions for changing places toilets.

Burial space

371. Policy S7 sets a framework to ensure provision is made for the different burial needs and requirements of London's communities, based on a proportionate evidence base. It sets out protection for existing burial space, support for new and specifies that loss of existing should only occur where it can be

¹⁷⁴ NPPF paragraph 73.

demonstrated that there is no ongoing or future demand. These provisions are to be realised through local policy making and development management. Further suggested changes ensure that a needs assessment is based on an audit of existing provision and opportunities for the reuse of burial space.

372. To tackle burial space shortages and address the requirements of those for whom burial is the only option, the Plan encourages cross borough collaborative working. This recognises that meeting the needs of residents in one borough may require burial provision in another. Through further suggested changes, it ensures that such an approach informs boroughs' assessment of cemetery demand. In setting out these requirements, the policy addresses the compelling evidence that shortage of burial space is reaching a critical stage in Greater London¹⁷⁵. It supports the provision of burial space near residents as a rule, to reduce costs and the need to travel, which would further the aims of Good Growth. Further suggested changes support environmentally friendly burial practices.

Conclusion

373. The social infrastructure policies in the Plan are necessary, justified, effective and consistent with national policy. They would be effective in protecting London's social infrastructure and support its enhancement to meet the needs of London's diverse communities. They would provide an effective strategic context for the preparation of local plans and neighbourhood plans. Further, their detailed criteria are necessary, justified and consistent with national policy. They would provide an effective basis for development management.

Would policies SD4 and SD5 be effective in ensuring an appropriate mix of housing, offices, retail, leisure and other development in and around the Central Activities Zone including the Isle of Dogs (north)?

374. The broad location of the CAZ is shown on the Key Diagram and Figure 2.16 in the Plan. It covers the City of London and parts of nine boroughs, as well as the geographically separate northern part of the Isle of Dogs, including Canary Wharf. The CAZ is internationally renowned for its culture, night-time economy, tourism, shopping and heritage, and accommodates around 30% of London's jobs, the seat of national Government, and more than 230,000 residents. The broad extent of the CAZ, and policies relating to it, build on well-established approaches in previous versions of the Plan.

375. Policy SD4 sets out strategic objectives for the CAZ and requires local plans to set out "locally sensitive" policies to achieve them as well as defining detailed policies. Further suggested changes ensure that the objectives strike an appropriate balance between strategic functions and locally orientated uses including residential and retail, as well as encouraging the adaptation and diversification of the international shopping and leisure destinations of the West End.

376. Policy SD4M requires sufficient capacity for industry and logistics to be identified and protected within and close to the CAZ to support the needs of businesses and activities within these areas. Whilst there is clearly pressure

¹⁷⁵ *An Audit of London Burial Provision-A report for the Greater London Authority by Julie Rugg and Nicholas Pleace, Cemetery Research Group University of York 2011.*

on such uses from higher value developments, this is an important objective to ensure the needs of the CAZ can be met as locally as possible. It sets out a clear objective in this regard, and the application of policy E4 should help to ensure that it can be achieved.

377. Policy SD5 sets out a prescriptive approach aimed at ensuring that new residential and mixed use development does not compromise the strategic functions of the CAZ. This approach includes affording “greater weight” to office uses and other strategic functions than to residential uses, other than in a number of specified locations. These specified locations comprise two Opportunity Areas, and wholly residential streets or predominantly residential neighbourhoods. A further suggested change makes it clear that these areas should be identified in local plans. This will provide clarity and ensure that the areas are justified, whilst allowing boroughs flexibility in terms of the choice of areas and how they identify them. Such flexibility is important, given the varied nature of how existing residential uses are distributed in the CAZ, including mixed use areas in Camden.
378. Policy SD5B states that residential development is not appropriate in parts of the City of London and Isle of Dogs to be defined in local plans. This is justified, given their international importance as office locations. However, the policy needs to be modified to provide flexibility in how the relevant areas are “identified” in local plans as there may be effective ways of doing this that do not entail defining “detailed boundaries” [**PR5**].
379. Around 3.5 million square metres of additional office floorspace is expected to be needed in the CAZ in the period to 2041. However, it is clear that in recent years, existing office floorspace is under significant pressure from higher value residential uses. There have been significant numbers of conversions to residential, and vacancy rates are now very low. Given this, and the internationally and nationally important role that offices in the CAZ play, the coordinated approach to the introduction of Article 4 Directions to remove office to residential permitted development rights set out in policy SD5F is justified in the interests of the economic wellbeing not only of the area but also of London and the UK.
380. Whilst policy SD5 focusses more on office uses than other strategic functions, policy SD4N allows for local plans to define CAZ retail and other specialist clusters and Special Policy Areas including those indicated on Figure 2.16 and listed in paragraph 2.4.13. Boroughs can, therefore, develop locally specific policies for such uses, and ensure that they are protected and accommodated as appropriate.
381. Overall, the approach to local plans and development management in policies SD4 and SD5 (subject to the further suggested changes) strikes an appropriate balance between accommodating development to meet the needs of the internationally and nationally significant strategic functions and protecting the interests of residents and locally-orientated uses. It is consistent with the Plan’s assumptions about how housing needs are to be met, and should ensure that the CAZ continues to play a highly significant economic role.

Conclusion

382. Subject to our recommendations, policies SD4 and SD5 would be effective in ensuring an appropriate mix of housing, offices, retail, leisure and other development in and around the CAZ.

Is the town centre network defined in the Plan, and are policies SD6, SD7, SD8, SD9, E1, E9 and E10, justified and consistent with national policy? Would they provide an effective strategic framework for accommodating office, retail, leisure, visitor accommodation and other main town centre uses in appropriate locations?

383. Population and economic growth is expected to lead to a need for additional floorspace for many main town centre uses¹⁷⁶ including shops, offices and hotels. Demand is likely to be particularly strong in certain locations, with retailing continuing to be increasingly focussed in larger town centres, some of which may see significant growth, and around 60% of additional office space expected to be required in the CAZ. Whilst overall vacancy rates in town centres are at a healthy level, a significant proportion of centres are expected to have surplus comparison goods retail space over the plan period. In this context, the Plan sets out a strategic approach aimed at managing changes to the network of town centres across London and ensuring that all main town centre use development is accommodated in appropriate locations consistent with national policy.

Town centre network

384. The Plan identifies a comprehensive network of well over 200 town centres¹⁷⁷. This includes two international (West End and Knightsbridge) and 14 metropolitan centres, along with around 30 major centres which typically have catchments extending beyond a single borough. The remainder are district centres and CAZ retail clusters. This builds on similar approaches in previous versions of the Plan, updated to take account of recent town centre health checks and consistent quantitative indicators. Whilst policy SD8 only allows future changes to international, metropolitan and major centres through a future review of the Plan, local plans can reclassify lower order centres. This provides a clear and justified strategic approach, whilst allowing boroughs appropriate flexibility to develop policies for the centres that are of essentially local significance.

385. Future potential changes to the higher order centres (to be considered in a future review of the Plan) are identified, including Shepherds Bush and Stratford becoming international centres and Brent Cross, Lewisham, Wembley and Woolwich becoming metropolitan centres. This takes account of committed developments and a range of indicators, and provides appropriate strategic direction to boroughs, infrastructure providers and potential investors so that they can plan the future development of those higher order centres accordingly.

¹⁷⁶ NPPF Annex 2 Glossary.

¹⁷⁷ Table A1.1 in Annex 1 and Figure 2.17.

386. The Plan also categorises the residential and commercial growth potential of each centre, as well as those that have a night time economy role of international/national, regional/sub-regional, or more than local significance. These classifications are based on consistent data and analysis meaning that they provide a justified strategic framework for boroughs to use at the local level. As relevant policies, including SD7, SD8 and HC6, require boroughs to have regard to the classifications (rather than rigidly comply with them), they are not unduly prescriptive. Rather, they allow boroughs to formulate policies to address the strategic role of the centre in a way that is justified by local evidence.

Policies SD6 and SD7

387. Policy SD6 sets out a number of ways in which the vitality and viability of town centres can be promoted and enhanced which provides an effective strategic framework consistent with national policy.

388. Policy SD7 sets out various policy requirements to be taken forward through local plans and/or development management, and a number of further changes were suggested by the Mayor following the hearing session aimed at ensuring consistency with national policy. Whilst some of the detailed wording differs from that in the NPPF, we are satisfied that this has been achieved.

389. Policy SD7A deals with development management and requires sequential tests and impact assessments in line with NPPF paragraphs 24-27. SD7AB provides a strategic framework for the allocation of sites for main town centre uses in local plans in line with NPPF paragraph 23 within the spatial context set by the town centre network and commercial growth classifications set out in Annex 1.

390. Policies SD7A(4) and E9BA(8) encourage the comprehensive redevelopment of edge and out of centre retail and leisure uses for a diverse mix of uses to realise their potential to provide housing and encourage sustainable transport. A further suggested change requires that net increases in retail or leisure floorspace in such redevelopment must be justified by a sequential test and impact assessment. This should provide adequate flexibility for retail and leisure uses and incentivise redevelopment which would make efficient use of land and help meet housing needs in line with policy H1. Whilst the policies could lead to the loss of sites suitable for certain types of retailing that depend on low density built form and plentiful customer parking, national policy does not suggest special provision should be made for such uses. Given the clear need to make more efficient use of land in London, and the potential for retailing to adapt and change to policy requirements and shopping habits, the approach set out in the Plan is justified.

391. High streets, including some that would not fall within the NPPF definition of a town centre, are one of London's most characteristic features and they play an important local economic and social role meaning that, collectively, they are of strategic importance. Policy SD7B(1A) states that boroughs should consider protecting and enhancing out of centre high streets in local plans subject to local evidence. This provides a justified approach that is consistent with

national policy, whilst allowing boroughs discretion as to how they achieve the policy aim.

392. The CAZ contains several retail clusters, which vary considerably in scale and character. As these are subject to policies SD4 and SD5, which set out a justified approach that differs somewhat from SD6 and SD7, it is justified for the Plan to make clear that those latter two policies do not apply in the CAZ.
393. Policies SD7C(4) requires development proposals to provide a range of commercial unit sizes, and a further suggested change to policy E9¹⁷⁸ requires local plans to secure an appropriate mix of shops and other commercial units of different sizes and, where justified by evidence of local need, policies to secure “affordable” commercial and shop units. “Affordable” is defined as rents maintained below the market rate for that space; this is clarified by a further suggested change to the Plan’s Glossary. We consider the issue of affordable workspace more generally later in this report, and conclude that it is sound. Subject to the further suggested changes, policies SD7C(4) and E9 should be effective in ensuring the provision of an appropriate mix of units to support the vitality and viability of town centres, having regard to evidence about high and rising retail rents in parts of London and the need for a wide range of shops and services to meet the different needs of diverse communities.
394. Policy E9BA(7) and paragraph 6.9.4 set out a positive strategic framework for London’s markets in their full variety, and acknowledge their valuable economic, social and cultural roles. Given the importance of markets, and the length, complexity and detail of other parts of the Plan, the short policy and single paragraph could be seen as disproportionately brief. However, it is consistent with national policy, and provides a succinct and clear approach that perhaps could have been mirrored elsewhere in the Plan.

Visitor accommodation

395. Policy E10 sets out a strategic approach to the provision of various types of accommodation and other infrastructure to meet the needs of the large and growing number of tourist, business and other visitors in different parts of London including the CAZ in the context of policies SD4 and SD5. A number of further suggested changes are required for consistency with the town centre first approach in policy SD7 and making best use of housing stock in policy H11, including through ensuring that short term lettings do not compromise housing provision.
396. The provisions of policy E10G are necessary to ensure that those visiting London, in particular, elderly and disabled visitors, have sufficient choice of accessible accommodation¹⁷⁹. A strategic approach is necessary to ensure consistency across London. The policy provides two options by which the development industry can fulfil policy requirements, enabling a response based on the size, type and characteristics of accommodation proposed. Further suggested changes clarify the implications of the application of the

¹⁷⁸ Deletion of part E of policy E9 and insertion of new part B(3) along with modifications to paragraph 6.9.9.

¹⁷⁹ NLP/EC/012.

British Standards quoted, which is necessary for clarity and to ensure effectiveness.

Offices

397. Significant growth in office-based economic activity is expected, with between 4.7 million and 6.1 million square metres of additional office space likely to be needed over the Plan period. This range is based on employment forecasts of relevant sectors and justified density assumptions, and has been calibrated against past trends. The figures for the CAZ, other parts of inner, and outer London are described in the Plan as broad monitoring benchmarks, and are broadly consistent with the indicative, capacity-based job growth figures for Opportunity Areas set out in Table 2.1. Policy E1 sets out strategic spatial guidance for where this additional floorspace should be provided in the CAZ and elsewhere having regard to the town centre network and growth classifications set out in Annex 1.

398. In 2018, 1.9 million square metres of office space had prior approval for conversion to residential uses. Over 50% of office space converted to residential uses in London had previously been occupied by businesses, including many micro, small and medium sized enterprises. Given the overall need for additional office floorspace, whilst there are surpluses in some areas including parts of inner London outside the CAZ, there is a need to protect existing viable stock as well as to provide new offices. We have already concluded that the coordinated approach to the removal of office to permitted development rights in the CAZ as proposed in policy SD5F is justified. For the same reasons, policy E1F is justified in encouraging the introduction of Article 4 Directions in other nationally-significant office locations and geographically defined parts of other existing and viable strategic and local office clusters.

399. A further suggested change clarifies that policy E1 supports the redevelopment, intensification and change of use of surplus office space to housing and other uses (part I), subject to there having been consideration of options to provide lower cost and affordable workspace in accordance with policies E2 and E3 or the re-use of surplus large spaces to smaller units (parts G and H). This should ensure that the demand for various different types of office space can be met, but also that non-viable and surplus space is put to good use including to help meet housing needs.

Hot food takeaways

400. Policy E9C requires boroughs to carefully manage over-concentrations of A5 hot food takeaway uses in town centres and other areas, and also prohibits development that includes such uses within 400 metres walking distance of all primary and secondary schools. This would have the effect of ruling out A5 developments in over half of London and over 90% of inner London, including in most town centres and CAZ retail clusters.

401. The context for this is that there are over 7,000 existing hot food takeaways in London, and many boroughs have high densities of such uses compared to other parts of England. London has the highest level of obesity in children at primary school leaving age in England, and it is increasing.

402. Food high in fat, sugar and salt is available from many non-A5 uses, including bakeries, butchers, convenience stores and restaurants. Some A5 uses offer healthy food options, but most offer only a limited range. Many school children, particularly secondary pupils, call into takeaways and other shops at lunch times and on their way home.
403. The causes of obesity and poor health are multi-faceted and complex, meaning that establishing a clear causal link to one particular factor is difficult if not impossible. However, national guidance is clear that planning policies can limit the proliferation of certain use classes in certain areas, and that regard should be had to locations where children and young people congregate including schools¹⁸⁰. There is clear evidence about relatively poor health amongst young people in London and high numbers of hot food takeaways. Thus, despite the difficulty there is in demonstrating a direct link between the proximity of A5 uses to schools and the consumption of unhealthy food, national guidance and common sense would suggest that, in principle, the approach set out in the Plan is justified.
404. There are many initiatives in London seeking to improve health and reduce health inequalities, and it is one of the greatest challenges facing the population. There is clear support for policies E9C and E9D amongst a wide range of health professionals and other stakeholders who see it as one means amongst many that should be taken to effectively address that challenge.
405. Many boroughs already have policies in existing local plans that seek to control the proliferation of hot food takeaways in one way or another. There is limited evidence before us about the effectiveness of such local policies, and in some boroughs with such policies levels of obesity have increased. However, the consistent, comprehensive and unambiguous approach proposed in the Plan is more likely to be effective, when applied in conjunction with other initiatives, in helping to tackle obesity and poor health across London.
406. Policy E9D states that any A5 developments that are permitted should be subject to planning conditions requiring compliance with the "Healthier Catering Commitment". This is a voluntary scheme in London that food businesses can sign up to, although currently it is only available to those of a certain size. As the standard is non statutory and is set outside the planning system a requirement for all A5 developments to comply with it is not reasonable. We therefore recommend that policy E9D should be amended to refer to local planning authorities considering whether the imposition of such a condition in any particular case would meet the tests set out in NPPF paragraph 206 [**PR33**]. This would give London-wide recognition to the emerging initiative, whilst ensuring that planning conditions are only used by boroughs when justified having regard to the current status of the scheme and its relevance to the development proposed.
407. By preventing the establishment of hot food takeaways in many parts of London, the policy could have an impact on business start-ups. However, many small businesses are established in existing premises and there are likely to be many opportunities amongst the 7,000 or so existing hot food takeaways to allow an adequate turnover as some operators close and new

¹⁸⁰ PPG ID-53-006-20170728.

ones start up. We do not, therefore, consider that the policy is likely to have any significant anti-competitive impacts. To the extent that it does, this would be outweighed by the social and economic benefits that would arise from the contribution the policy would make to improving health and wellbeing, particularly in deprived areas.

408. Levels of obesity and poor health amongst school children are particularly high in the more deprived parts of London, where there are relatively high numbers of people with low incomes and in some groups with protected characteristics. On the other hand, many hot food takeaways are operated by people from black and minority ethnic background. The policy is, therefore, likely to have disproportionate impacts on those parts of London's population. For the reasons set out above, the positive impacts would outweigh the negative, and this would particularly be the case for people in deprived areas and from groups with protected characteristics.
409. A number of other potential unintended consequences of the policy have been suggested by representors. However, the first part of the policy should be effective in preventing the over concentration of A5 uses in areas that are further than 400 metre from schools. Enforcement powers are available if needed to address the unauthorised use of non A5 premises for that purpose.
410. Overall, therefore, we are satisfied that policy E9C is sound, as is E9D subject to our recommendation.

Conclusion

411. We therefore conclude that, subject to our recommendations, the town centre network defined in the Plan and policies SD6, SD7, SD8, SD9, E1, E9 and E10 are justified and consistent with national policy, and would provide an effective strategic framework for accommodating office, retail, leisure, visitor accommodation and other main town centre uses in appropriate locations.

Are policies E4 to E7 and T7 justified and consistent with national policy, and would they provide an effective strategic framework for accommodating all types of industrial and related activities and the sustainable movement of freight?

412. A significant amount of industrial and related land in London has been redeveloped for other uses since the beginning of this century. There now remains around 7,000 hectares which are concentrated in central London and four other broad property market areas along main transport routes and river valleys (Thames Gateway, Lee Valley, Park Royal/Heathrow and Wandle Valley). This land is in a wide range of industrial, storage, distribution and other uses that are increasingly essential to the functioning of London's economy and meeting the needs of its growing population. However, pressure continues for redevelopment of some industrial sites to higher value uses including residential.
413. Of the existing 7,000 hectares of industrial land, around 50% is designated as strategic industrial locations ("SIL", which is identified in Table 6.3 and on Figure 6.2); 14% as locally significant industrial sites ("LSIS"); and 36% is non-designated.

Need for industrial land

414. The Mayor's evidence¹⁸¹ indicates that there will be a modest reduction in the amount of land needed for manufacturing over the plan period (-166 hectares), although there are indications that in recent years there has been a slight increase in demand. Storage and distribution uses are expected to require more land amounting to between 280 and 400 hectares depending on the assumptions made about plot ratios, a matter that we consider below. However, there have been significant changes in storage and distribution operations in recent years, including related to online shopping, and these trends are expected to continue. This, and significant population growth, could mean that more land, or sites in new locations, will be needed for B8 uses than is assumed in the Plan. Overall, the amount of land in other industrial and related uses is not expected to change significantly.
415. The Plan assumes an average plot ratio of 65% building footprint to 35% outside space based on analysis of a wide range of industrial sites¹⁸². However, there is a significant amount of evidence from boroughs and industrial site developers and occupiers of much lower plot ratios in some areas and for some uses, including storage and distribution. Whilst this does not mean that the average of 65% could not be achieved in the future, it does suggest that it may be challenging in some locations and for some types of development.
416. The Plan acknowledges that, of the existing 7,000 hectares, 185 hectares had planning permission in 2015 for non-industrial development, and a further 653 hectares had been identified by boroughs as having potential for redevelopment. Whilst some of these 838 hectares could ultimately be retained for industrial uses there is no certainty that this will transpire. The 2017 SHLAA indicates that the amount of designated and non-designated industrial land that had approval, was allocated, or had been identified as having potential for other uses had increased to 944 hectares¹⁸³. This suggests that more industrial land may actually be lost than assumed in the Plan based on the earlier industrial land studies.
417. The amount of vacant industrial land and premises in most boroughs is below 5%, which is a reasonable threshold to assume in an efficiently operating market. Some boroughs in east London have significantly higher vacancy rates, which if brought down to 5% would reduce the need for additional land by around 330 hectares. However, even if all of this vacant land were to be taken up, which is by no means certain as the reasons for it being unused are not clear, it would only go some way to replacing that which seems likely to be lost elsewhere.
418. All of the above indicates that there is likely to be a need, in quantitative terms, for more industrial land to meet future demand over the plan period to 2041 than assumed in the Plan. Whilst we cannot precisely quantify the requirement, it could be many hundreds of hectares based on the 2017 SHLAA and the uncertainties associated with the vacant industrial land in east

¹⁸¹ *Industrial Land Demand Study 2017* [EC/003] and *Industrial Land Supply Study 2016* [EC/006].

¹⁸² *London Employment Sites Database 2017* [EC/002a] section 3.3 and *Analysis of Plot Ratios in Industrial Development in London 2011-2018* [EC/032].

¹⁸³ SHLAA 2017 tables 5.22 and 5.23 [HOU/002].

London. Alternatively, the industrial land that does remain would have to be used much more intensively. However, even if that were so, whilst the existing industrial sites may be distributed across property markets and in locations that are generally suitable for the types of industrial use that are expected, there will almost certainly be a need to meet new locational and site specific requirements of some businesses including in and around the CAZ and other accessible locations.

Industrial land supply

419. The overall approach set out in the Plan is for the wide range of industrial development needs to be met on existing sites, including through the protection and more intensive use of SIL and LSIS; by reducing the amount of vacant land in the Thames Gateway; and by identifying six boroughs to provide additional capacity.
420. The Plan, rather than expressing policies in terms of hectares of land, does so by referring to floorspace and yardspace. Whilst this is a new approach in London, it is an integral part of the way in which policies E4 to E7 are intended to operate to achieve no net loss of capacity within SIL and LSIS across London in overall terms. The Mayor's further suggested changes go some way to simplifying policies E4 to E7 which are collectively long and rather complex. In the context of the nature and role of the Plan as described earlier in this report, we are satisfied that the structure of policies E4 to E7 is acceptable.
421. However, in light of what we have concluded above about the need for industrial development over the Plan period, we consider that the approach to meeting those needs set out in E4 to E7 is aspirational but may not be realistic. This is for a number of reasons relating to the practicalities and viability of significant intensification of SIL and LSIS, the continuing pressure to redevelop non-designated sites for other uses, and the likely need for new sites in certain locations, including in and around the CAZ.
422. That said, much of the need is long term, and there are obviously significant uncertainties associated with predicting economic activity and associated land needs into the distant future. Achieving Good Growth will take considerable effort and changes in behaviour from all those involved in development. There is merit, therefore, in taking forward the overall approach set out in policies E4 to E7, subject to the following modifications which are required to ensure that the Plan is positively prepared in respect of meeting industrial development needs in the short to medium term.
423. Policy E4A should be strengthened to make it clear that a sufficient supply of industrial land and premises should be provided as well as maintained [**PR28**]. Furthermore, in finalising the Plan, further consideration should be given to the management of industrial floorspace capacity categorisations in Table 6.2 in order to provide a more positive strategic framework for the provision of industrial capacity [**PR29**]. We are unable to provide greater specificity about which particular boroughs' categorisations may need to be changed, due to the relationship with the SHLAA and housing targets and because of the apparent lack of non-Green Belt options for significant new locations for industrial development.

424. Moreover, the reasoned justification (paragraph 6.4.6) should be amended to refer to boroughs considering whether the Green Belt needs to be reviewed through their local plan process in order to provide additional capacity and/or new locations in the context of policy G2 [**PR30**]. This would ensure that the Plan is effective in allowing boroughs to identify a sufficient supply of land in different parts of London to meet current and future demands for industrial uses as required by policy E4.
425. We conclude elsewhere that the Plan be modified to include reference to a future strategic, London-wide Green Belt review. This should ensure that medium to longer term industrial needs can be met in sustainable locations if monitoring of this Plan indicates that policies E4 to E7 are not likely to be effective in achieving that aim. In order to provide clarity, the reasoned justification to policy E4 should be modified accordingly [**PR31**].
426. Policy E7D needs to be strengthened further to help protect non-designated industrial sites which currently make up over a third of all industrial land [**PR32**]. Whilst this is unlikely to be effective in preventing the redevelopment of most of the 900 hectares or so of land identified in the SHLAA, it is necessary to ensure the Plan is effective in protecting all viable industrial sites, including those occupied by small businesses, in the future.
427. Policy E7B refers to the possibility of the co-location of residential and social infrastructure alongside industrial uses on LSIS. Whilst this could make efficient use of land, it may be difficult to satisfactorily achieve in many areas and viability is likely to be an issue. However, the policy is not prescriptive, and such development is not expected to make a significant contribution towards meeting the Plan's housing targets. No further modifications are therefore required.

Freight, deliveries and servicing

428. The efficient movement of freight, and a shift to more sustainable modes, has economic, social and environmental benefits. The distance travelled by road freight in London has increased by around 40% in the last 25 years or so, and this trend is expected to continue. Policy T7 sets out a number of measures to reduce the need for, and impact of, freight trips and to coordinate the provision of infrastructure and facilities to manage freight in a sustainable way at a strategic level. The policy is expressed in terms of implementation through development plans and determining planning applications and deals appropriately with the spatial development aspects of the Mayor's *Transport Strategy* and *Freight and Servicing Action Plan 2019*¹⁸⁴. Policy T7 as a whole is consistent with and complements policies E4, SD1 and SD4M which aim to ensure a sufficient supply of land and premises to meet current and future demands for storage and distribution uses throughout London including in Opportunity Areas and the CAZ.
429. Policy T7C requires development plans to safeguard railheads unless it can be demonstrated that they are no longer viable or capable of being made viable for rail-based freight-handling, and sets out a number of factors to consider in assessing viability. This provides a consistent approach towards strategic

¹⁸⁴ TR/001 and TR/018.

infrastructure that will be critical if the trend towards increased road freight is to be successfully addressed. Whilst other topics are dealt with in greater detail in other parts of the Plan, this does not mean that the approach to rail freight is not sound.

430. The Mayor has suggested a number of further changes to policy T7 and reasoned justification. Subject to these, part E provides a positive approach to the development of consolidation and distribution facilities, which are expected to be needed, subject to a limited number of justified caveats. The addition of “where possible” to part E(5) rightfully acknowledges that some such facilities may be required even if they do not deliver mode shift from road to water or rail.
431. Part F has been amended to make it clear that the provision of on-street loading bays can be appropriate in certain circumstances if necessary off-street facilities for servicing, storage and deliveries cannot be incorporated into a development.
432. Further suggested changes to paragraph 10.7.6A make it clear that a variety of schemes can be used to help reduce road danger associated with construction works and to enable the use of safer vehicles. Subject to these changes, the policy is not unduly prescriptive as it allows for alternatives to the specific schemes referred to.
433. Finally, a further change suggested to paragraph 10.7.1 makes it clear that the policy seeks to facilitate sustainable freight movement by rail, river and road including through modal shift. For the reasons set out above, we are satisfied that the various parts of the policy should help to achieve this. However, so that the overall purpose of the policy is clear such that it will be effective, part A should set out that overall objective. Furthermore, to ensure consistency with policy SI15 and that the potential for canals to be used for moving freight is realised, “rivers” should be replaced with “waterways”. We recommend accordingly [**PR52**].

Conclusion

434. Subject to our recommendations, policies E4 to E7 and T7 are justified and consistent with national policy, and they would provide an effective strategic framework for accommodating all types of industrial and related activities and the sustainable movement of freight.

Are policies E2 and E3 relating to low cost and affordable business space justified and would they be effective in helping to support sustainable economic growth?

435. The continued success of London’s diverse economy is dependent upon a wide range of types of accommodation in appropriate locations to meet the varied requirements of micro, small, medium and large businesses, social enterprises and other employers. As well as meeting the physical accommodation needs of occupants, the provision of units of different size, type and quality should also ensure that the market offers a range of rents that most viable businesses can afford. This is particularly important due to the high cost of workspace in London relative to other parts of the country, and the vital

contribution that smaller and less profitable businesses make to the social and economic well-being of the city.

436. Policies E2 and E3 are intended to help ensure that accommodation is available to meet the different needs of all types of businesses. However, as originally drafted the policies are not sound in a number of respects. The Mayor has suggested further changes which largely rectify the deficiencies which we consider below.

437. Provided that both policies are effective, they are likely to particularly benefit lower income businesses and sectors that have social value which in turn should be beneficial to a number of groups with protected characteristics.

Policy E2: Low cost business space

438. Policy E2 needs to be modified to clarify that it is intended to ensure the provision and, where appropriate, protection of a range of business space in terms of type, use and size. Furthermore, it should apply to the full range of B use classes, rather than being restricted to B1. Part A needs to be clarified to make it clear that it is to be taken forward in local plans, and part B that its application in the determination of planning applications will only be in areas identified in local plans. The reasoned justification needs to better explain the purpose and rationale for the policy, including that it will help to ensure that workspace is available at an appropriate range of rents. However, the title should refer to "providing suitable business space" rather than "low cost" business space to accurately reflect its purpose.

439. All of those modifications are adequately dealt with by the further suggested changes. However, the reference to "an appropriate range of rents" in part A should be deleted from the policy because, whilst that may be a beneficial consequence, attempting to control the rental levels of market properties is not justified or consistent with national policy [PR26]. The reference in part B to "shortage of lower-cost space" (which is clearly defined in paragraph 6.2.2 as secondary and tertiary space available at open market rents) is, however, justified. This is because that would be a relevant factor to take into account by boroughs when considering whether to identify areas in their local plan.

440. The additional text in paragraph 6.2.1A relating to basic fit out helps to explain the policy, rather than setting out an unduly prescriptive policy requirement. Part C, relating to the provision of flexible workspace or smaller units as part of larger B class developments, is justified as it is not unduly prescriptive and would not, for example, prejudice a development intended for a single occupant.

Policy E3: Affordable workspace

441. Affordable workspace is workspace that is provided at rents maintained below the market rate for that space for a specific social, cultural, or economic purpose. Whilst not an approach that is specifically referred to in national policy, it has been proposed in previous versions of the Plan and carried forward by boroughs in a number of adopted local plans. In principle, it is justified by the particular affordability problems in parts of London and the viability evidence supporting the Plan. Furthermore, it represents a proactive

and positive approach in line with the NPPF by supporting business start-ups and specific sectors that have social value, all of which are critical to achieving sustainable economic growth across London.

442. The Mayor's suggested changes to policy E3 and paragraphs 6.3.1 to 6.3.3 are necessary to ensure that it is effective and justified. These make it clear that the policy will only apply to areas and locations identified in local plans, or where there is currently affordable workspace on site or has been since the Plan was published except where that was provided on a temporary basis pending redevelopment of the site.
443. Part F requires the affordable workspace elements of all mixed-use schemes to be operational or have agreed finalised terms prior to any residential elements being occupied. Whilst it is essential to ensure that the workspace is provided, the specified approach is not justified as it could compromise the viability of some schemes, particularly larger ones that may be developed in phases. As part A makes it clear that the provision of affordable workspace will be secured by planning obligations, ensuring timely delivery of the workspace can be adequately controlled by that legal mechanism in a manner to be determined by the local planning authority. Therefore, part F should be deleted, and appropriate text added to the reasoned justification [**PR27**].

Conclusion

444. Subject to our recommendations, policies E2 and E3 are justified and would be effective in supporting sustainable economic growth.

Would the policies for green infrastructure assist in creating a healthy city and will they provide an effective strategic context for the preparation of local plans and neighbourhood plans? Are they and their detailed criteria justified and necessary and would they provide an effective basis for development management?

Green infrastructure, open space and urban greening

445. The Plan recognises the multiple benefits of green infrastructure for residents and visitors and the city in general. It is important that there are high quality, accessible, natural spaces close to where people live and work. Various aspects relating to achieving this and other Good Growth objectives are covered in policies G1 to G9 so that national policy expectations for the natural environment would be met and exceeded. They will also contribute to the Mayor's commitment to make more than half of London green by 2050.
446. Policy G1 sets the overarching approach incorporating both protection and enhancement and including the need for boroughs to prepare green infrastructure strategies. There are definitions of open space, green space, green infrastructure and green cover. These clearly overlap but we are satisfied that they are properly aligned with one another and are sufficiently clear. Water spaces are included within the definition of green infrastructure. In this way the Plan adequately reflects the qualitative differences and value of different types of green infrastructure, including open and green space and the role of blue space.

447. Private gardens make up about 24% of London's land area but only about 60% of this is green due to the introduction of paving and decking. Nevertheless, these areas make an important contribution to green infrastructure as well as providing a safe and secure area for residents. The Mayor's *Environment Strategy* contains details of how their environmental performance might be improved. The NPPF indicates that local planning authorities should consider policies to resist the inappropriate development of residential gardens. However, there is no justification for including a London-wide protection for all domestic gardens within this strategic development strategy.
448. The focus of policy G4 is on assessing the need for open space, protecting it as necessary and creating new space - particularly in areas of deficiency. It requires development plans to undertake a needs assessment taking account of all types of open space including that which is not publicly accessible. Areas of deficiency should be identified by means of this process. Regard should also be had to the public open space categorisation in Table 8.1. This is not a definitive list as it provides examples of typologies so that others can be included to reflect local circumstances and it is therefore justified. Overall the policy provides a comprehensive framework to ensure sufficient protection for all open space in terms of both amount and quality.
449. The concept of the application of an Urban Greening Factor is based on the use of similar devices in other cities around the globe and is supported by the evidence.¹⁸⁵ This is enshrined in policy G5 with target scores set by the Mayor pending the introduction of locally-derived ones by the boroughs. Whilst none of the measures listed in Table 8.2 as contributing to urban greening are new, the policy "raises the bar" and provides a clear framework for major developments in addition to other expectations for open space. There is no clear rationale for extending the policy to all development at present.
450. The scoring system provides a firm basis for assessment and is a justifiable and innovative starting point for policy making in this area. Whilst experiences vary and the testing undertaken has not been extensive, there is no strong evidence that for residential and office development the interim targets are unachievable. Some argue that they should be higher than 0.4 and 0.3 respectively but they appear to strike the right balance at the moment. Potential costs have been factored in and the policy will bring about benefits to the value of developments by focussing attention on greening and ensuring that it is considered from the outset.
451. However, the scope to undertake most of the Urban Greening Factors for industrial and warehouse development is limited and would therefore be difficult to achieve. A green roof is the most likely option with additional construction costs, loading and maintenance issues. The evidence on viability is not convincing. The Mayor seeks to address this by means of a further suggested change to the reasoned justification which recognises the challenges and indicates that this can be considered on a case by case basis with further guidance to be developed. However, the policy would take effect once the Plan is published and would be liable to inhibit development within use classes B2 and B8. Until further evidence has been produced about the

¹⁸⁵ NLP/GI/001.

practical implications for development of this kind it should be excluded from the policy and this is recommended as [**PR39** and **PR40**].

452. The scoring values are derived from the research report and are similar to those used elsewhere. Others might ascribe different weightings to the various surface cover types but there is nothing to indicate that these are wholly unwarranted based on their potential for rainwater filtration. The policy would apply, as a matter of course, to development proposals and, subject to modification at borough level, to site allocations. Reference is made to management and on-going maintenance. The aim of policy G5 and the detailed criteria are justified.

Green Belt and Metropolitan Open Land

453. There have been a number of calls for a review of the Green Belt in London to be carried out. This matter needs to be considered in the light of our earlier findings that capacity within London is insufficient to meet the identified annual need for housing and the potential shortfall of industrial land in the medium to longer term. We take a review to mean examining all land within the Green Belt to ascertain whether and to what extent it meets the Green Belt purposes defined in the NPPF and also to take into account any potential to promote sustainable patterns of development in line with the 2019 NPPF. This, in turn, might identify possible locations for growth and so lead to an assessment of whether exceptional circumstances might exist to justify the release of Green Belt land.

454. Different approaches to doing a Green Belt review have been canvassed ranging from requiring boroughs to undertake them based on assessment criteria devised by the Mayor, to the Mayor undertaking that work himself and to the identification of specific growth areas or corridors. Whilst the Green Belt occupies 22% of the land area of the capital it is only some 7% of the entire Metropolitan Green Belt which stretches across the wider South East. Any exercise should consequently take account of cross-boundary issues relating to the coherence and durability of the Green Belt on the periphery of the capital as well as across London itself. Therefore, a key part of an effective review in London is likely to involve joint working and positive engagement with adjoining authorities and boroughs.

455. Conflicting evidence has been provided about the extent of urban brownfield land and brownfield or other land within the Green Belt that might be suitable for sustainable development. The Plan itself observes that some Green Belt land is derelict and unsightly and does not provide significant benefits. In any event it is implausible to insist that the Green Belt is entirely sacrosanct without having considered what it comprises and the impact that it has on wider strategic objectives. Furthermore, the NPPF does not entirely rule out changes to Green Belt boundaries although exceptional circumstances are required to justify this.

456. The Mayor argues that however it is done such a review would take some time to complete. A commitment to undertake one could nevertheless be contained within the Plan. Indeed, from our perspective it would be a logical step to do this as part of on-going future plan preparation and to assess, as an option, whether it would be reasonable to release Green Belt land in order to close the

gap between housing need and supply in London. This is especially given the difficulty of accommodating growth in the wider South East. There is also a need to consider medium to longer term industrial needs.

457. Therefore from the evidence we heard the inescapable conclusion is that if London's development needs are to be met in future then a review of the Green Belt should be undertaken to at least establish any potential for sustainable development. Therefore we recommend that this Plan include a commitment to a Green Belt review [**PR35**]. This would best be done as part of the next London Plan. Given its strategic nature and to ensure consistency the review should be led by the Mayor and should involve joint working with authorities around the administrative boundary as well as the boroughs. This would form the basis for the Mayor to consider Green Belt release as a means to deliver housing and industrial development that cannot be accommodated in the existing built up area or in adjoining areas.
458. Policy G2 is not consistent with national policy. In particular, it states that development proposals that would cause harm to the Green Belt should be refused and makes no reference to very special circumstances. Similarly, the extension of the Green Belt should only be undertaken in exceptional circumstances as set out at paragraph 83 of the NPPF. Finally, the blanket provision that de-designation will not be supported also ignores the NPPF reference to altering boundaries in exceptional circumstances through the preparation or review of local plans.
459. The Mayor maintains that the policy would not preclude limited Green Belt release in exceptional circumstances but that is not what the policy says. Moreover, any borough proposing this would be likely to encounter general conformity issues. The wholesale opposition to the loss of Green Belt land is advocated on the basis that it should be unnecessary as development needs can be met on brownfield land without recourse to the Green Belt. But that is not the case and national policy is not couched in this way. London's Green Belt is not obviously different to that encircling other major cities. Any borough proposing Green Belt release would have to justify this at examination taking account of the provisions of paragraph 137 of the 2019 NPPF. This expects all other reasonable options to have been examined including discussions with neighbouring authorities.
460. Furthermore, given our conclusions about the ability to deliver housing and industrial development within London it would be wrong to unilaterally rule out changes to the Green Belt. That is not to say that they should be supported as a matter of course because the national policy provisions outlined above should apply. As well as the five purposes in national policy there are also other beneficial functions that Green Belt land serves as highlighted in paragraph 8.2.1. But it should be left as an option to provide boroughs some flexibility in deciding how best to meet their development needs, including those specifically identified in the Plan.
461. The policy also fails to clarify that support for multi-functional uses does not override the presumption against inappropriate development and this should be remedied. We therefore recommend that policy G2 be adjusted so that it is consistent with national policy [**PR36**].

462. Metropolitan Open Land ("MOL") has long been recognised as having equivalent status to Green Belt although it has separate criteria for designation. This is maintained and recognised in the Plan by policy G3 which affords the same level of protection to MOL as to Green Belt in accordance with national planning policy tests. The NPPF allows for the existence of very special circumstances and so specifying that proposals causing harm to MOL should be refused is inconsistent with it and should be removed [**PR37**].
463. Boundary alterations should be undertaken through the local plan process. However, there is no justification for requiring that the quantum of MOL is not reduced as a result and the overall value of the land improved. Given that exceptional circumstances are required to change the boundaries in any event and that the policy seeks to enhance the quality and range of uses these provisions are overly onerous and so should be omitted [**PR38**]. The policy does not encourage land swaps per se although this is mentioned in the supporting text but any such arrangements would be considered against the relevant policy tests. Subject to the recommended changes, the detailed criteria provide sufficient clarity about inappropriate development and how any boundary alterations should proceed.

Biodiversity, trees and food growing

464. National policy in the NPPF seeks to provide net gains in biodiversity where possible. There is therefore no case for insisting that this is mandatory within the London Plan. The general tenor of policy G6D is therefore justified. Otherwise the policy provides protection to *Sites of Importance for Nature Conservation* ("SINC") as well as areas outside of them and ecological networks or corridors. The policy contains a mitigation hierarchy in the event that harm to a SINC is unavoidable and where the benefits of the development outweigh biodiversity impacts. The final option is compensation off-site and whilst a last resort, this type of mitigation is not discounted by national policy and its inclusion here is justified. However, this provision should reflect NPPF paragraph 109 in achieving equivalent or better biodiversity value where possible rather than being based on the principle of net gain [**PR41**].
465. The Mayor is seeking to increase tree canopy cover in London by 10% by 2050. This is a challenging but realistic target which policy G7, together with other green infrastructure policies, will assist in achieving. In particular, it underlines that borough development plans should identify strategic locations for planting to maximise potential benefits as well as protecting and maintaining existing trees and woodlands.
466. Food growing is recognised as having a number of benefits as set out in paragraph 8.8.1. Policy G8 links to the Mayor's *Food Strategy*¹⁸⁶ and encourages food growing including provision of space for urban agriculture whilst protecting existing allotments. The approach to best and most versatile agricultural land is covered in national policy and does not need to be incorporated. Overall the London Plan sets a suitable framework for this type of use which can be taken forward at a local level.

¹⁸⁶ NLP/GI/006.

Conclusion

467. Subject to our recommendations the policies for green infrastructure would assist in creating a healthy city and would provide an effective strategic context for the preparation of local plans and neighbourhood plans. The detailed criteria are justified and necessary and would also provide an effective basis for development management.

Would the policies relating to a zero-carbon city, air quality and water infrastructure assist in creating a healthy city and provide an effective strategic context for the preparation of local plans and neighbourhood plans? Are these policies and their detailed criteria justified and necessary and would they provide an effective basis for development management?

Minimising greenhouse gas emissions, energy infrastructure and managing heat risk

468. The Mayor's aspiration in the *Environment Strategy*¹⁸⁷ is for London to become a zero-carbon city by 2050 and this is reflected in the Good Growth objectives. The sustainable infrastructure policies are geared towards achieving that end which is a justifiable approach. They would also contribute positively towards the objective of creating a healthy city as part of the Mayor's general duty to have regard to climate change and its consequences¹⁸⁸. As further suggested changes the Mayor has clarified that zero-carbon refers to net zero-carbon in all cases as defined in the Glossary.

469. This is an area where technology is evolving and so flexibility is required especially as changes to the Building Regulations are expected. When these are introduced this might, in turn, trigger the need for a partial review. In the meantime the policies build on existing established approaches in London. Whilst some argue that they do not go far enough we consider that they are ambitious and progressive and pursue carbon reductions as far as can be expected given the Mayor's limited powers in this area and his resources. They also adequately emphasise the importance of the use of renewables.

470. The requirement to achieve a 35% reduction in emissions beyond the Building Regulations in policy SI2 is realistic but will become more challenging to meet through typical gas-based technologies as other energy sources become cleaner meaning that other ways are required to achieve it. The expectation that development will achieve a proportion of this through energy efficiency measures is based on firm evidence¹⁸⁹ and is therefore justified. Where on-site measures to reduce carbon emissions have been fully explored but cannot be achieved, contributions to achieve net zero-carbon should be made to a carbon off-set fund. For example, this could provide valuable sums to improve the carbon performance of the existing stock. This is not the default position and the Mayor will continue to monitor its effectiveness as well as updating the existing guidance as necessary including the price for off-set carbon.

¹⁸⁷ NLP/SI/025.

¹⁸⁸ S41 (4) of GLA Act 1999.

¹⁸⁹ NLP/SI/009 & 011.

471. The NPPF refers to actively supporting energy efficiency improvements to existing buildings. The above measures would assist in this but retro-fitting may not require planning permission in many cases. There is nevertheless reference to major refurbishment in paragraph 9.2.1.
472. Policy SI2 includes criteria relating to unregulated emissions from plant and equipment outside the Building Regulations and the calculation of whole life cycle carbon emissions over the lifetime of a development including demolition. It is evident that in future these broader methods of measuring carbon impact will become increasingly important and there are existing tools to assess them. The provisions are intended as a starting point so that data and good practice is captured and understood as a pre-cursor to future policy development. As such, they do not introduce additional technical standards and their intent and application is justified. It also makes sense at this juncture to keep these parts of the policy separate from the well understood provisions relating to regulated emissions. Guidance is to be produced by the Mayor about such assessment including how information should be reported to enable verification and monitoring.
473. Policy SI3 contains provisions relating to energy masterplans for large scale development locations and given their scale this approach is justified and the list of matters to be covered is comprehensive. It also sets out a heating hierarchy for major development proposals within Heat Network Priority Areas. Based on the latest evidence it is reasonable to order the different types of communal low-temperature heating systems in this way rather than presenting them as a "menu" to select from. Equally it is wise not to expressly rule out options such as combined heat and power under certain circumstances given that technology may change over the period of the Plan. Therefore the sequence and content of the heating hierarchy is justified. The policy also sets a framework for boroughs to identify opportunities for expanding or establishing new networks.
474. As further suggested changes, the policy and supporting text would be strengthened to refer to good practice design and specification standards for new and existing networks. The Plan also makes specific reference to decarbonisation plans for existing networks and to ensure a reliable cost-competitive service for customers.
475. The importance of managing heat risk through design is emphasised by policy SI4. This is warranted due to rising temperatures and the urban heat island effect. Major developments should seek to follow the cooling hierarchy as demonstrated through their energy strategies and these principles can also be applied to minor development.
476. Overall these policies concerned with greenhouse gas emissions, energy and infrastructure and managing heat risk would contribute effectively to achieving a healthy city as well as wider legal duties in respect of climate change.

Air quality

477. Improving air quality is a very important part of the objective of creating a healthy city as air pollution has significant impacts on health, quality of life and life expectancy especially for those who are most vulnerable. The Mayor

is committed to making air quality in London the best of any major city and achieving compliance with legal limits for nitrogen dioxide as soon as possible.

478. Policy SI1 links with other policies including those relating to transport and energy infrastructure and encourages a design-led approach to the issue in common with that of the design policies. It is broadly consistent with paragraph 124 of the NPPF which indicates that planning policies should sustain compliance with, and contribute towards, international values or national objectives for pollutants.
479. Following the Mayor's further suggested changes the policy makes a clear differentiation between the expectations for development plans and individual proposals and clarifies the terminology. It also gives greater emphasis to the importance of design measures for developments within Air Quality Focus Areas likely to be used by large numbers, especially the young and the elderly. However, it is overly prescriptive to insist that applications in such areas and affecting these groups be refused. Therefore revised wording is recommended so that this part of the policy is justified [**PR42**]. Subject to this change it would provide an effective strategic context for the preparation of local plans and neighbourhood plans and an effective basis for development management.
480. Development proposals are expected to be air quality neutral by reducing emissions on site. Where this cannot be accomplished then off-site measures should be undertaken near to the development itself. Within large scale development proposals there may be scope to improve air quality. However, the reference to an Air Quality Positive approach is not sound as this term was not defined. As a result it is not possible to make this a specific policy requirement although the principles of maximising benefits and reducing pollution exposure can be incorporated through the preparation of a statement. The Mayor has done this through a further suggested change which promotes good practice whilst avoiding unduly onerous stipulations.
481. Some argue that policy SI1 should be stronger but the detailed criteria are justified and, in combination with other strategies, should contribute towards achieving a critical aspect of Good Growth.

Water infrastructure

482. Given that London is a seriously water stressed area and as there has been a water consumption target in place since 2006, it is justifiable to expect development proposals to use the optional requirement in the Building Regulations of a total of 110 litres per day. Otherwise policy SI5 sets a suitable framework for encouraging a sustainable use of resources and ensuring adequate provision for water infrastructure.

Conclusion

483. Subject to our recommendations the policies relating to a zero-carbon city, air quality and water infrastructure would assist in creating a healthy city and provide an effective strategic context for the preparation of local plans and neighbourhood plans. The policies and their detailed criteria are justified and necessary and would provide an effective basis for development management.

Would Policy SI6 help to ensure London’s global competitiveness now and in the future?

484. Enabling quick and easy access to the world and affordable wired and wireless connectivity are prerequisites to maintaining London’s social wellbeing, competitiveness and attractiveness as a global city. A policy to support the provision of digital connectivity infrastructure is justified on this basis and its inclusion would accord with national policy¹⁹⁰. SI6A sets out requirements for new development, whilst SI6B ensures that development plans support digital infrastructure, with a particular focus on areas with gaps in connectivity and barriers to digital access. These, together, will assist in ensuring digital connectivity for end users and the mitigation of any detrimental impacts to mobile connectivity as a result of development. It will help to ensure that these matters are considered as part of the development plan and development design process. Whilst SI6 sets higher standards than the Building Regulations, this is to ensure that London keeps pace with changing technology and global trends in digital connectivity and capability. This is consistent with national policy and the Government’s existing and emerging approach to planning for digital infrastructure¹⁹¹.

Conclusion

485. Policy SI6 is justified and effective. It is necessary and is consistent with national policy. It will assist in ensuring London’s global competitiveness now and in the future.

Would the London Plan’s waste policies assist in effectively managing London’s waste, in accordance with the principles of the circular economy¹⁹²? Would they be effective in helping reduce waste and promoting net self-sufficiency?

486. The Mayor is not a waste planning authority. He therefore has limited influence over how and where waste is managed, which is the responsibility of boroughs. However, he sets out a strategic approach to managing London’s waste in the *London Environment Strategy*, which includes measures that go beyond the planning system. This suite of policies complements those measures.

487. Policy SI7 sets out proposals, including targets, for reducing waste and supporting the circular economy. The overall approach accords with national policy and the waste hierarchy¹⁹³, with a focus on preventing waste in the first instance, improved reuse and recycling, design principles that support efficient use of materials and development that enables recycling at source. Overall, it would assist in ensuring that new developments utilise existing buildings and materials, are designed for deconstruction and reuse and reduce

¹⁹⁰ Paragraph 42-44 NPPF 2012 and paragraph 112 NPPF 2019.

¹⁹¹ DCMS Future telecoms Infrastructure review, 23 July 2018 and DCMS UK Digital Strategy 2017 1 March 2017

¹⁹² An economic model in which resources are kept in use at the highest level possible for as long as possible to maximise value and reduce waste, moving away from the traditional linear economic model of ‘make, use, dispose’.

¹⁹³ DEFRA, Waste Management Plan for England, December 2013 4 European Union, Directive 2008/98/EC of the European Parliament; HM Government, Our waste, our resources: A strategy for England, December 2018; DCLG, National Planning Policy for Waste, October 2014, Pg. 4.

environmental impact of London's built environment. This policy, along with SI8 and SI9, appropriately address the role for landfill and energy from waste, in the current London context, in accordance with the principles of the circular economy.

488. In setting out the overall approach, Policy SI7, includes targets for different waste streams. The target for zero biodegradable or recyclable waste to landfill has been brought forward from the current Plan. It was tested at examination and found sound and we have no reason to take a different view, particularly as landfill sites in the wider South East are expected to reach capacity by 2026. With a focus on reuse and recycling at source, the reduction in reliance on landfill is a fundamental strand of the overall strategy.
489. The target for municipal waste recycling, has its origins in the London Environment Strategy. It accords with current definitions of municipal waste adopted by Department of Environment, Food & Rural Affairs, which align with European Union definitions¹⁹⁴. It is ambitious. However, the Mayor sets out a pathway for its achievement, drawing on action from Government within the *London Environment Strategy*. With the measures set out and changes called for from Government, some of which have been responded to¹⁹⁵, both targets are achievable and realistic. Some authorities are already achieving 50% recycling rates, which adds weight to this conclusion¹⁹⁶. Further suggested changes will ensure that design of new development will be effective in supporting recycling.
490. Targets are included for construction, demolition and excavation waste, which together are a significant source of London's waste. These targets again have their origins in the current Plan. Given the intended implementation timescale of 2020 in the current Plan, which would be very challenging to monitor and assess, and the widely recognised difficulties in monitoring this waste stream, the absence of a timescale in this Plan is realistic and justified. The approach to excavation waste accords with the Environment Agency definition of "beneficial use", which is defined in the glossary. As many projects are already meeting these targets, and their achievement is likely to be boosted by the requirements of the circular economy statements, the approach is realistic and justified.
491. The policy sets out a model for boroughs to introduce circular economy principles in development management through circular economy statements for referable applications. This will assist in meeting the targets for construction, demolition and excavation waste. Further suggested changes enable boroughs to set local thresholds for the application of circular economy statements, which will assist in embedding efficient resource use in the development process. This is an essential part of the overall approach to supporting London's transition to a circular economy.
492. Policy SI8 sets out measures to deal with London's waste sustainably, promoting net self-sufficiency and ensuring adequate capacity, applying the principles of the circular economy. The drive to net self-sufficiency is brought

¹⁹⁴ Department of Environment, Food & Rural Affairs, Guidance: Local authority collected waste – definition of terms, 23 September 2011.

¹⁹⁵ HM Government, Our waste, our resources: A strategy for England, December 2018.

¹⁹⁶ DEFRA, ENV18 - Local authority collected waste: annual results tables, Last updated December 2018.

forward from the current Plan, was examined at that time and considered sound. The *London Environment Strategy* sets out an approach to assist in its delivery. It is a realistic and justified strategy. The suite of measures, which along with net self-sufficiency include safeguarding waste management sites, optimising capacity at existing, provision of new, where required, and creating benefits from waste, are a sound and realistic package, applying the Mayor's powers in meeting the policy aim.

493. Policy SI8B sets out matters that should be addressed in development plans, which accord with the higher level principles of the policy suite. Further suggested changes clarify that boroughs should plan for identified waste needs, which provides necessary clarification.
494. The waste apportionments indicate how much household and commercial and industrial waste each borough should plan for. Those apportionments include hazardous waste that originates within those waste streams. However, they do not include construction, demolition or excavation waste. Given the uncertainties of data for this waste flow, the Plan's support for dealing with it at source and that it usually does not require permanent infrastructure, this is a reasonable and justified approach to assessing capacity needs. In addition, large development projects result in significant differences in material flows over time, over which boroughs have limited control, which adds weight to this conclusion.
495. There was concern regarding the methodology used to assess the borough apportionments. The methodology underpinning this has its origins in previous Plans, is tried and tested and has been updated and retested in this Plan. Waste arisings and projections are calculated by a logical methodology, using appropriate information sources. The application of a 5% reduction in household waste by 2031 due to the application of the circular economy principles is evidence based and justified. Measuring waste per capita as opposed to per household reasonably takes account of the trend to reduced household size. The methodology and assumptions used were independently tested and found to be reasonable¹⁹⁷. We have no reason to disagree.
496. The methodology used to apportion those waste needs to boroughs has been refined in this Plan, the main effect of which is to reduce the number of criteria used and omit any weighting. This is to reduce the importance attached to historic patterns of waste movements and capacity¹⁹⁸, which is a logical and realistic approach. Further, there is concern regarding the choice of criteria and their weighting. However, it is not obvious that other criteria should be used or that the weight applied is significantly skewed. Overall the methodology is logical, thorough, is consistently applied across boroughs and well understood. As a mechanism to assess capacity, it is justified.
497. Mayoral Development Corporations ("MDC") are not assigned a waste apportionment. This is problematic for boroughs that include an MDC. This is mainly because MDCs generally include large areas of unconstrained land suitable to deal with waste capacity, which has the effect of increasing a borough's theoretical waste capacity through the application of the

¹⁹⁷ NLP/SI/003 and NLP/SI/004.

¹⁹⁸ NLP/SI/006,6a; 6b.

methodology. However, boroughs have no planning functions in MDCs to provide waste capacity.

498. As a matter of principle it cannot be right that the responsibility for meeting a MDC's waste needs fall solely on the borough. This matter was highlighted in the FALP examination report¹⁹⁹. Oral evidence suggests that the measures introduced at that time to ensure that MDCs co-operate with boroughs to meet borough apportionment requirements have not been successful²⁰⁰. Further suggested changes elevate these requirements to policy to address this legitimate concern. That should provide some comfort for boroughs and is a pragmatic approach for this Plan. However, we recommend that in future iterations of the Plan full consideration is given to apportioning waste needs to MDCs [**PR43**].
499. Matters to be encouraged in development proposals for materials and waste management sites accord with the principles of the circular economy, and the Plan's overall approach. Further suggested changes ensure low emission combined heat and power provisions accord with policy SI3.
500. The carbon intensity floor is a standard for the greenhouse gas performance of technologies which generate electricity from non-recyclable waste, developed to help decarbonise London's energy supply. Its application here will encourage the highest standard of recycling and reduce residual waste going to energy generation. This will accord with the principles of the circular economy and in this context is justified.
501. SI9 deals with safeguarding waste sites, which is an essential element of the overall waste approach. Further suggested changes assist boroughs in negotiating the relocation of waste sites across borough boundaries, where strategic waste management aims are met.
502. Monitoring of all targets within these policies is fundamental to their effectiveness. It is an essential element of the *London Environment Strategy* and the production of the annual monitoring report on London's waste performance and movements. Construction, demolition and excavation waste will be monitored through the circular economy statements. Further suggested changes to the supporting text clarify this.

Conclusion

503. Subject to the recommendation above, we find the Plan's waste policies, SI7-SI9 would assist in effectively managing London's waste, in accordance with the principles of the circular economy. They would be effective in helping reduce waste and promoting net self-sufficiency.

¹⁹⁹ Further Alterations to the London Plan, Inspector's Report November 2014.

²⁰⁰ Oral evidence on 30 April 2019 of boroughs of Brent and Ealing.

Would policy SI10 effectively assist in planning for future demand and supply of aggregates to support construction in London and contribute to the national resource?

504. SI10A sets out how an adequate supply of aggregates to support construction in London will be achieved. Most aggregates used in London come from outside, including marine dredged sand and gravel and land-won aggregates, principally crushed rock from other regions. There are however, small resources of workable land-won sand and gravel in London. The Plan's approach to aggregates firstly encourages reuse and recycling of construction, demolition and excavation waste, then extraction of the land-won resources to meet the London and national need and importing aggregate, using sustainable transport modes. This is a realistic and logical strategy, based on London's current reliance on imports, its limited potential for land-won resources and the imperative of the circular economy principles. It would accord with national policy²⁰¹.
505. The Plan does not include a target for the reuse and recycling of construction, demolition and excavation waste. This is because meeting a target may discourage aggregate material being kept at its highest and best use for as long as possible, which would conflict with the principles of the circular economy. This, coupled with the unreliability of data surrounding this aggregate source, justifies the absence of a target. However, a further suggested change encourages reuse and recycling on site, which is necessary to reduce travel and accord with the principles of the circular economy.
506. SI10B and C set clear guidance for mineral planning authorities and development plans to help deliver the overall strategy. Measures include making provision for a seven-year land bank of land-won aggregates, ensuring capacity of aggregates wharves and rail depots and supporting production of recycled/ secondary aggregate. In setting out steps to enable the Plan's overall approach, provisions to ensure its implementation at local level are justified and necessary. They provide adequate protection for wharves and rail depots, putting them on an equal footing in this policy.
507. The approach to land-won aggregates has been rolled forward from the current Plan. In short, it establishes a London wide land-won aggregates requirement for the Plan period, translates that into a seven-year land bank over the same period and then apportions it to the four boroughs with resources. In addition, other boroughs with potential supply are encouraged to bring it forward. In this respect, the Mayor has produced a *Local Aggregate Assessment for London June 2018*. To avoid boroughs without resources duplicating information regarding recycling, reuse and imports, this is a reasonable and proportionate approach.
508. The apportionment approach is a justified method for this Plan. It provides a guide to boroughs with resources as to how much should be planned for through their Local Aggregate Assessments. Given that the Mayor is not a mineral planning authority and this Plan is a strategic development strategy, the approach would accord with national policy²⁰². Taking account of other

²⁰¹ Paragraphs 145-146 NPPF.

²⁰² Paragraph 145 NPPF.

supply options set out in S10A, it would provide a strategic framework for boroughs to assist them in ensuring a steady and adequate supply of aggregates. It justifiably concentrates on identified resources only.

509. The London requirement is based on the national picture²⁰³, reduced to take account of London specific circumstances. It sets a requirement for 0.7 million tonnes per annum, which is translated into the requirement for a 5 million tonne seven-year land bank. Those figures come from the current Plan. They were subject to examination at that time. They have been retested through this Plan and have been found to be challenging but achievable²⁰⁴. Even though London's overall ten-year average sales and land bank are below the requirement set²⁰⁵, local plan allocations and policy commitments demonstrate significant potential for augmenting supply and meeting the land bank requirement. Given the need for London to have a local supply, the current and forecast demand for aggregate and current capacity, the level of construction activity and the number of large construction projects in the pipeline, it is a justified approach. At the end of the day any uplift in supply will depend on the aggregate industry having confidence to invest. The adopted approach would provide adequate flexibility to assist in this and encourage sites to come forward.
510. There was concern that given ten-year average sales, some boroughs, including Hillingdon, may not be able to demonstrate the necessary land bank apportionment. However, Local Aggregates Assessments, including data on demand, are just one part of the picture, in planning for future demand and supply of aggregates. Mineral planning authorities are required to take account of the national picture to also ensure that London contributes to the national Managed Aggregates Supply System²⁰⁶.
511. S10C in requiring mineral planning authorities to identify minerals safeguarding areas, to safeguard wharves, rail heads and certain aggregate processing facilities, would accord with national policy²⁰⁷. SI10D sets out how development plans should assist in reducing the environmental impacts of aggregates facilities and protect safeguarded sites from sterilisation by inappropriate adjacent uses. Further suggested changes ensure that SI10E addresses potential conflicts of development proposals with sites safeguarded for the transportation, distribution, processing and/or production of aggregates, in line with the agent of change principle. This is necessary given London's dependence on aggregate imports.

Conclusion

512. Policy SI10 would effectively assist in planning for future demand and supply of aggregates to support construction in London and contribute to the national resource.

²⁰³ National and Sub National Guidelines for Aggregates Provision in England 2005-2020.

²⁰⁴ NLP/SI/042 London Aggregates Working Party AMR 2017 December 2018.

²⁰⁵ NLP/SI/041 Table 6, 7 and 8 Local Aggregate Assessment for London June 2018.

²⁰⁶ Paragraph 145-146 NPPF.

²⁰⁷ Paragraph 143 NPPF.

Is policy SI11, in relation to hydraulic fracturing (fracking), consistent with national policy and is it justified?

513. The Plan sets out a blanket restriction on the exploration, appraisal or production of shale gas via hydraulic fracturing within London. In this respect, the approach would be fundamentally inconsistent with the direction of national policy, which sets out the need to explore and develop shale gas and oil resources in a safe, sustainable and timely way. It states that plans should not set restrictions or thresholds across their plan area that limit shale development without proper justification²⁰⁸.

514. It is highly unlikely that there is any suitable geology in London for fracking and so the policy is unnecessary. In addition, the Mayor's concern is the potential impact on climate change, air quality, water resources and impacts on the Green Belt and MOL along with the conflict that would result with other land uses and inconsistency with other Mayoral strategies. However, those concerns relate to most large urban areas and given the clear support in national policy, they provide inadequate justification for the approach taken. It would restrict the assessment of development proposals on a case by case basis, including consideration of national policy and the concerns expressed by the Mayor. Further, whether national policy, in this regard, is directly applicable to the Mayor and this Plan or not, policy SI11 would have the effect of severely limiting those bodies and plans to which that national policy would apply.

Conclusion

515. Policy SI11, in relation to hydraulic fracturing, is unnecessary. Given national policy and the limitation it places on local decision making that would be a consequence, there is insufficient justification for it. The policy and the reasoned justification should be deleted in its entirety [PR44].

Would policies SI12 and SI13 be effective in managing London's flood risk including surface water management?

Flood risk management

516. Policy SI12, seeks to ensure that current and expected flood risk from all sources across London is managed in a sustainable and cost-effective way, including strategic collaboration from all responsible bodies. Further suggested changes ensure that this refers to all sources of flooding, which are expanded on in the supporting text.

517. SI12B requires development plans to utilise key evidence to identify where flooding might exist and formulate policies to respond to it, including the use of the Regional Flood Risk Appraisal ("RFRA"), which provides a strategic analysis of the risk from all sources of flooding that could affect London. This will ensure that the RFRA will influence a Borough's Strategic Flood Risk Assessment and encourage the consideration of flood risk early in the preparation of development plans. Given that flood risk is a major issue for

²⁰⁸ Paragraph 147 NPPF; Planning for Onshore Oil and Gas: Written Statement HCWS20; Energy Policy: Written Statement- HCWS690.

London, managing it plays a crucial part in London's resilience to the impact of climate change and sustainably accommodating London's growth. This is a justified approach to reducing flood risk, allowing resilience to be built efficiently in development design and making the best use of development sites. Further it would meet the aims of national policy in this regard²⁰⁹.

518. SI12C provides an effective approach to addressing flood risk as apart of assessing development proposals, by minimising and mitigating risk and addressing any residual risk and encouraging flood risk to be integral to the development process. This will ensure that resilience is built effectively into development design.
519. SI12D and SI12F, together clarify that development plans and proposals should seek to protect the integrity of flood defences, which will assist in the delivery of the strategic aim of the policy. SI12E will assist in mitigating the impacts of climate change by ensuring increased flood resistance and resilience in development for utility services.
520. To mitigate the impacts of climate change SI12FA requires the consideration of natural flood risk management measures as part of development proposals. Such measures are likely to take the form of small-scale interventions in upper river catchments and would be effective in reducing the need for costly large scale engineering solutions that can have negative effects on the environment.

Sustainable drainage

521. Given current climate change predictions and related increases in the intensity of storms and rainfall, the likelihood and consequences of surface water flooding will increase²¹⁰. A consistent approach to London's resilience to surface water flooding is essential therefore. Policy SI13 sets out an effective approach to surface water management, requiring Lead Local Flood Authorities to identify and address surface water management issues through their Local Flood Risk Management Strategies and Surface Water Management Plans. Those documents can then be used as evidence base in the preparation of development plans.
522. SI13B sets out a comprehensive drainage hierarchy intended to reduce surface water runoff in new development. Replicated from previous iterations of the Plan, it aims for green field runoff rates, which is defined in the glossary as a further suggested change, to ensure clarity and effectiveness. The hierarchy allows for a wide range of drainage solutions, prioritising green features over grey engineering drainage measures. It will assist in minimising the pathway where flooding can occur and delivering a whole range of multifunctional benefits. It is a practical and effective approach.
523. SI13C promotes permeable paving. However, in requiring that development proposals for impermeable surfacing should be refused, it would unjustifiably restrict local decision making. This should be modified to enable an appropriate planning balance to be undertaken by boroughs [**PR45**].

²⁰⁹ Paragraph 94 NPPF.

²¹⁰ NLP/SI/025.

524. SI13D ensures that the design and implementation of sustainable drainage delivers multiple benefits for the environment and Londoners, such as water quality improvements, enhanced biodiversity, urban greening and recreation. This will help to meet the Plan's strategic objective in GG2 to make the best use of land, creating a healthy city and increasing efficiency and resilience.

Conclusion

525. There was general support for the purpose and extent of these policies, including from the Environment Agency. We conclude that, together, policies SI12 and SI13 would be effective in assisting the management of London's flood risk, including surface water management. They are necessary, justified and consistent with national policy.

Are policies SI14 to SI17 relating to waterways justified and consistent with national policy and they would be effective?

526. Policies SI14 to SI17 deal with the development and use of land necessary to support the objectives of promoting and encouraging the safe use of the River Thames, in particular for the provision of passenger transport services and for the transportation of freight²¹¹, and protecting and enhancing all of London's waterways as multifunctional assets that have considerable social, economic and environmental value.

527. Whilst the number of policies about the Thames and other rivers, canals and water spaces, and some of the terminology used, is different to that in past versions of the Plan, that in itself does not raise soundness issues. We consider below whether each of the policies meets the necessary tests, and collectively whether they will achieve the above objectives.

Policy SI14: Waterways – strategic role

528. The Mayor's further suggested changes to policy SI14 make it clear that development plans and proposals should address the strategic importance of London's network of waterways and maximise their multifunctional social, economic and environmental benefits. They also clarify how boroughs should work collaboratively on cross boundary waterways issues including designating Thames Policy Areas and preparing area-based joint strategies for the Thames and other waterways.

529. Subject to the further suggested changes, the policy sets a positive strategic framework that allows an appropriate degree of flexibility for how it can be taken forward by boroughs. Preparing, updating and implementing joint Thames strategies may not have been a priority for some boroughs in the past, but we are not persuaded that it is necessary to set out a more prescriptive approach in the Plan or that this would be effective in securing more resources for implementation.

530. Part AA is explicit that environmental benefits should be maximised, and paragraph 9.14.2 refers to the Thames and other waterways providing a unique backdrop for heritage assets including World Heritage Sites. This helps

²¹¹ GLA Act section 41(5)(d).

to ensure that, along with other relevant policies, the Plan sets out a positive strategy for the conservation and enhancement of the historic environment.

531. Paragraph 9.14.8 advises that additional stretches of the Thames should not be protected as MOL as this may restrict the use of the river for transport infrastructure related use. We understand the intention, and indeed the calls for the Plan to go further in terms of requiring the de-designation of MOL along the Thames. However, a modification to this paragraph is required to ensure consistency with policy G3 which refers to MOL boundaries being changed in exceptional circumstances. Furthermore, we recommend that this sentence be moved to the reasoned justification for policy G3 [**PR46**].

Policy SI15: Water transport

532. There are various strategies and initiatives in place aimed at doubling the amount of passenger and freight transport on the Thames by 2035. Policy SI15 sets out strategic priorities for development alongside and within waterways aimed at achieving those aims, particularly in relation to passenger piers (part A), boatyards (part B) and wharves (parts D to H).
533. Wharves and related land uses are essential components of the infrastructure needed to increase the movement of freight on the Thames and other waterways. Many wharves are under pressure to be redeveloped for other uses, including mixed use residential. However, wharves are an essentially finite resource and once lost are highly unlikely to be replaced. The Plan therefore aims to provide a high level of protection in a variety of ways. In principle, this is justified, consistent with national policy, and necessary to address a matter of strategic importance and help deliver Good Growth.
534. Around 50 wharves in London that are used for cargo handling uses such as intraport or transshipment movements and freight related purposes are "safeguarded" under relevant legislation. Policy SI15D commits the Mayor to keeping the network of safeguarded wharves under regular review. We are aware of certain criticisms of the review commenced in 2018, and of analysis that indicates the capacity of safeguarded wharves may exceed demand by 30% by 2041. However, we are not persuaded that a more permissive approach towards the redevelopment of safeguarded wharves for housing and other uses is necessary at this stage. There is inevitable uncertainty associated with predicting capacity as far ahead as 2041, and any overall capacity figure has also to be treated with caution because infrastructure will be needed in suitable locations along the Thames with sufficient flexibility to allow for changing circumstances over time.
535. In this context, parts E to H provide an appropriate level of protection to safeguarded wharves. Part E allows for potential redevelopment for other uses if a safeguarded wharf is no longer viable or capable of being made viable. Paragraph 9.15.7 sets out criteria to be used in assessing viability which we accept represent a "high bar". However, the criteria are justified as they are needed to ensure that potentially viable wharves are not lost unnecessarily to higher value land uses. Part D allows for the possibility of consolidating safeguarded wharves as part of strategic land use change, particularly in Opportunity Areas.

536. Non-safeguarded wharves are not subject to the strict requirements of parts E to H meaning that there may be opportunities for redevelopment of those to other uses if they are not needed to help facilitate an increase in freight transport in accordance with policy SI15C.

Policy SI16: Waterways – use and enjoyment

537. Policy SI16, subject to the further suggested changes, sets out a positive approach aimed at ensuring that development plans and proposals protect and enhance infrastructure and facilities needed to allow waterways to be used and enjoyed in ways appropriate to their multiple functions. This requires a balance to be struck between encouraging development, and safeguarding the natural and historic environment and other relevant waterway interests.

538. The number of boats using London's waterways more than doubled between 2010 and 2016 and there is now a deficit of both short and long stay moorings and facilities such as power, water and waste disposal for boat operators. Policy SI16D supports the provision of new moorings and other such facilities subject to a number of criteria that are necessary to safeguard navigation interests and the character of waterways. Policy SI17C allows for developments into waterways that include permanently moored vessels provided that they are for, or to support enhancement to, water-related uses. The reasoned justification to policy H16 refers to the needs of boat dwellers having regard to the duty under section 124 of the *Housing and Planning Act 2016* to consider places on inland waterways where houseboats can be moored. Together, these policies strike an appropriate balance between meeting the increasing demand for moorings and facilities for moored boats, house boats, and continuous cruisers, and other important objectives related to the multifunctions of rivers and canals.

Policy SI17: Protecting and enhancing London's waterways

539. Policy SI17 seeks to ensure that development protects and enhances the environment of London's waterways in various respects including biodiversity, character and heritage. Part B requires development to support and improve the distinct open character and heritage of waterways. As such, it should not unduly restrict development, but rather ensure that its scale and design is appropriate having regard to the character and appearance of the particular section of waterway in which it is located.

540. Part C states that development into waterways should generally only be supported for water-related uses or to support enhancements of such uses. This provides sufficient flexibility to allow boroughs to determine what would represent or support a water-related use having regard to the particular circumstances of the case. The policy allows for development that would deliver significant regeneration provided that it met the criteria, including in Opportunity Areas. A more permissive approach, that would allow development within waterways that failed to meet the criteria, is not necessary to meet the Plan's objectives or to be consistent with national policy.

Conclusion

541. Subject to our recommendations, policies SI14 to SI17 are justified and consistent with national policy and will be effective in providing a strategic framework for development affecting London's waterways.

Are policies T1 to T6.5 and T9, the transport schemes set out in Table 10.1, and the cycle and car parking standards set out in Tables 10.2 to 10.6 justified and consistent with national policy, and would they be effective in helping to ensure that the development proposed in the Plan is delivered in a way that achieves Good Growth?

542. The Plan was prepared in parallel with the *Mayor's Transport Strategy 2018*²¹² ("MTS") which sets out an ambitious approach aimed at reshaping transport in London over the next 25 years. The two documents are supported by extensive evidence that includes strategic modelling²¹³. This identifies outcomes that are expected by 2041 if the Plan and MTS were to be successfully implemented and compares these with the situation in 2015 and a reference case. The latter is based on the growth proposed in the Plan but with only committed transport schemes being implemented.

543. The modelling concludes that successful implementation of the Plan and MTS would, compared with 2015 and/or the reference case, reduce car journeys²¹⁴ from 37% of all trips in London to 20%; reduce road traffic kilometres by 10% to 15%; reduce road congestion and rail crowding; improve bus speeds; and reduce each of the four key emissions affecting air quality and climate change (carbon dioxide CO₂, nitrogen oxide NO_x, and particulate matter PM_{2.5} and PM₁₀).

544. Figure 10.1A in the Plan illustrates that the overall modal shift to 80% of journeys being made by foot, cycle or public transport by 2041 would involve achieving mode shares of 95%, 90% and 75% in central, inner and outer London respectively. These figures compare to 90%, 80% and 60% in those parts of London in 2015. The greatest change in travel behaviour would therefore have to take place in outer London, where around a third of all trips are made²¹⁵. This is challenging, and will require the successful implementation of a range of interventions including healthy streets, car parking standards, and transport schemes in outer London including bus improvements, suburban rail, strategic interchanges, the Sutton link, and a West London orbital rail service.

545. Chapter 10 of the Plan contains various transport-related policies to be implemented through development plans and development proposals that collectively, along with other relevant policies, are aimed at helping to achieve those outcomes. If achieved, there would be many benefits including: reduced congestion, delay, noise, severance and greenhouse gas emissions; improved air quality and road safety; a higher quality built environment and

²¹² TR/001.

²¹³ TR/002, TR/016 and TR016A.

²¹⁴ "Car journeys" includes motorcycle, taxi and private hire journeys.

²¹⁵ Around 10 million trips are made every day entirely within outer London. Across the whole of London, around 27 million trips start or end in London.

public realm; improved town centre vitality; more efficient use of land; and increased physical activity improving health and wellbeing.

546. The successful implementation of the MTS and some of the policies in the Plan, including the transport schemes set out in Table 10.1, is dependent on a significant amount of funding being secured to cover the expected average capital cost of around £3.3 billion per year. We considered earlier in this report the assumptions about public and private sector investment, and concluded that they are justified. There is no need to deal with that issue again here, other than to highlight the critical importance of securing the necessary transport investment and successful implementation of the Plan's transport policies to the achievement of Good Growth.

Strategic transport schemes

547. Table 10.1 sets out an indicative list of transport schemes grouped under "healthy streets and active travel" and "public transport", along with an indication of their cost and timescale. They are derived from a longer list of options that were considered through the process of preparing the MTS and the Plan over a period of about two years. Table 10.1 reflects the preferred scenario tested through the transport modelling, and the schemes are part of the package of interventions that are expected to deliver the beneficial outcomes described above. Some of the schemes are particularly important to supporting growth in Opportunity Areas and other locations, especially after 2029. However, as the SHLAA is based on committed transport projects, the ten year housing targets are not dependent on the Table 10.1 schemes.

548. Whilst there are many different views about which particular transport schemes are needed and should be prioritised in London, we are satisfied that those included in Table 10.1 are justified. They were selected using a rational process that involved consultation and extensive evidence and analysis, and their strong emphasis on sustainable modes of transport is consistent with national policy. The indicative list does not mean that other projects, including limited capacity improvements to the road network, cannot be brought forward if justified. Rather, the list provides clarity about strategic schemes that are expected to be needed, and will be prioritised by the Mayor, Transport for London and others, to help deliver Good Growth over the medium to long term. They can therefore be taken into account as appropriate in investment decisions by both the public and private sector, as well as by boroughs in their local plans and development management decisions.

549. We recommended earlier in this report that Figure 2.15 and associated text be moved to the transport chapter along with text to clarify the status of the initial strategic infrastructure priorities in the wider South East and how they relate to the transport schemes listed in Table 10.1.

550. We turn now to consider whether policies T1 to T6.5 and T9 are sound and therefore likely to be effective in delivering the beneficial outcomes described above and thereby contribute to Good Growth in the context of the overall spatial strategy and other policies in the Plan.

Policies T1, T3 and T9: Strategic approach, transport capacity, connectivity and safeguarding, and funding transport infrastructure through planning.

551. Policy T1 makes clear that development plans and proposals should support and facilitate the strategic target of 80% of trips to be made by foot, cycle or public transport and the proposed transport schemes in Table 10.1, both of which are justified for the reasons set out above. This provides a clear strategic framework, which is then followed up with more detailed requirements and guidance in subsequent policies.
552. Parts B(2) and C of policy T3 seek to ensure that development plans and proposals safeguard and protect land for transport schemes including those set out in Table 10.1. The Mayor has suggested further changes to T3B and T3C and the reasoned justification which have the effect of qualifying and clarifying the requirements. This ensures that, in most respects, they are consistent with national policy which advises that sites and routes which could be critical in developing infrastructure to widen transport choice should be protected where there is robust evidence²¹⁶. However, the absolute requirement that proposals should be refused if they fail to comply with the policy is not justified as the schemes in Table 10.1 are at various stages of preparation and account would have to be taken of other policies and material considerations at the relevant time. We therefore recommend alternative wording [**PR48**].
553. Policy T9C provides strategic guidance on the use of planning obligations to help deliver new and improved transport infrastructure. This sets out some strategic priorities, which are consistent with the Table 10.1 schemes and other transport policies in the Plan, without being unduly prescriptive. The approach, including the recognition of cumulative impacts, is consistent with national policy²¹⁷.

Policy T2: Healthy streets

554. Policy T2 is based on evidence about how the design and layout of streets can help to encourage walking, cycling and the use of public transport rather than the car, improve health, and create more pleasant environments. The requirements for development plans and proposals to demonstrate application of the healthy streets approach allows sufficient flexibility as the associated Transport for London guidance and indicators are not unduly prescriptive or onerous. The policy should help to ensure a consistent approach and raise the quality of the public realm across London over time.

Policy T4: Assessing and mitigating transport impacts

555. Policy T4 sets out various requirements to ensure that development proposals are based on proper assessment of their transport impacts and include appropriate mitigation measures where necessary. The focus is on sustainable modes of transport, and preventing development making roads more dangerous. Subject to the Mayor's further suggested changes, the requirements are largely consistent with national policy and make reference to relevant Transport for London guidance. However, the requirement in part B to be "in accordance with" that guidance, which is prepared outside the

²¹⁶ NPPF paragraph 41.

²¹⁷ NPPF section 4 and paragraph 204.

statutory planning process, is not justified and we recommend accordingly [PR49].

Policy T5 and Table 10.2: Cycling

556. Policy T5 provides a strategic framework aimed at ensuring that development helps to remove barriers to cycling and creates a healthy environment in which people choose to cycle. This includes new and improved cycle routes and well designed and located cycle parking in accordance with the minimum standards set out in Table 10.2. The standards relate to all types of development, and include both long stay parking for residents and employees, and short stay parking for visitors and customers. Some of the standards are higher than in previous versions of the Plan reflecting both a significant increase in cycle use in recent years²¹⁸ and a more ambitious approach to encouraging this further. This is in line with national policy²¹⁹ and the Mayor's strategic objective of achieving the 80% sustainable mode share in London.

557. The standards are based on potential, rather than current or past, use of cycle storage spaces. That approach is justified because most buildings are expected to be used for many decades, and making provision in new development is much more efficient and cost effective than providing it retrospectively. Furthermore, two thirds of car trips in London are less than 5 kilometres in length, showing that there is considerable potential for many more trips to be made by cycle. That said, there has to be a reasonable prospect that the required spaces are likely to be used in the coming decades even if not in the short term. As with all other requirements, the standards were taken into account in the viability assessment of the Plan which we considered earlier in this report.

558. In most cases, based on the evidence before us, the standards are justified in the context of the above and because they take account of potential demand associated with different use classes. We comment on the standards for certain forms of development below.

Residential cycle parking

559. All dwellings are required to provide a least 2 spaces for residents, other than those with one bedroom (1 or 1.5 spaces per unit), along with a limited number of shared visitor spaces. Despite this being considerably more than some evidence indicates is needed²²⁰, this level of provision for general market and affordable housing is justified as many households are likely to own two or more cycles. Many existing homes do not have purpose designed cycle storage, and this will add to the quality of the overall housing stock in that respect.

Specialist older persons accommodation cycle parking

560. Whilst many older people may have the ability and desire to cycle, we are not convinced that there is the same potential for increased cycle ownership

²¹⁸ Cycling in London has doubled since 2001.

²¹⁹ NPPF section 4 and *Cycling and Walking Investment Strategy 2017* (Department for Transport).

²²⁰ A survey of 18 developments in inner and outer London shows that a total of 300 dwellings had been provided with 213 spaces but only 28% of those were being used (Galliard Homes written statement for matter 85).

amongst that element of the population as there is amongst younger households. As drafted, the policy would require a space for every bedroom in all forms of specialist accommodation for the elderly other than care homes falling within use class C2. There is some evidence that cycle ownership could be as low as 1 in 60 amongst elderly residents in specialist accommodation²²¹. Whilst that level of provision could be unduly low looking to the medium to longer term, we recommend that, at least until there is further evidence to justify a higher standard in a future review of the Plan, specialist older persons accommodation be subject to a standard of 1 space per 10 bedrooms [PR50]. Based on the evidence before us, this would represent provision well above current cycle ownership levels amongst the relevant population thereby reflecting the potential for these to increase.

Purpose built student accommodation cycle parking

561. A survey of 10,000 bed spaces in recent purpose built student accommodation developments shows that 4,500 cycle spaces had been provided but that only 361 were in use²²². This is not necessarily representative of all student developments in London, nor does it reflect the potential for many more students to own cycles in the coming decades. However, it is highly unlikely that there will be a need for one space for every student in the foreseeable future if ever. We therefore recommend that, at least until there is further evidence to justify a higher standard in a future Plan review, purpose built student accommodation be provided with 0.75 spaces per bedroom [PR50].

Offices cycle parking

562. The availability of adequate cycle parking facilities at places of work is a strong influence on workers choice of travel. Opportunities are extremely limited for on street parking of cycles in many office locations, particularly the CAZ. It is essential, therefore, that sufficient spaces are provided wherever possible within office developments to meet potential demand which is expected to increase significantly over the Plan period. One space per 75 square metres in areas that currently have relatively high levels of cycle commuting (Plan Figure 10.2) would equate to about one space for every 5 employees (19%)²²³. Whilst this would be around three times the amount that current rates of cycle commuting in those areas (6%) suggest would be needed, it is a reasonable requirement for new developments given the clear potential for increased use and the importance of not constraining opportunities. In other areas, the requirement is for half as many long stay spaces, which again is justified for the same reasons.

563. In addition to long stay spaces, office developments are required to provide a significant number of short stay spaces for visitors. This is important, because as for workers it is likely to influence travel choice. Whilst the expectation is that such spaces are provided within the development, policy T5B allows for alternative approaches in certain circumstances meaning that there is sufficient flexibility.

²²¹ Retirement Housing Consortium written statement for matter 85.

²²² Unite Students written statement for matter 85.

²²³ NLP/TR/004.

564. Whilst providing the requisite short and long stay spaces in some office developments, particularly on small sites and in tall buildings, will no doubt require innovative approaches, we are satisfied that the approach set out in the Plan is justified for the reasons that we have already set out.

Policies T6 to T6.5 and Tables 10.2 to 10.6: Car parking

565. Around 60% of car journeys in London end in a different borough to which they started. The availability of parking, particularly at destinations, influences decisions about whether to own and use a car. The provision of parking in development is therefore a strategic matter, and a consistent approach needs to be taken if it is to be effective. Policies T6 to T6.5 require compliance with maximum standards in Tables 10.3 to 10.6 and set out various other requirements to be taken forward in local plans and development proposals. The standards seek to restrict the provision of general parking compared to the past, and take account of the scale and type of development, car ownership levels and use, accessibility by non-car means, and the needs of disabled people. In this context, and for the specific reasons set out below, we are satisfied that there is clear and compelling evidence to justify the approach to car parking set out in the Plan²²⁴

Residential car parking

566. Most existing households in London have access to a car parking space, although around 45% do not own a car. Ownership has fallen in recent years and is expected to continue to do so. The improvements to public transport and to facilities and the street environment for pedestrians and cyclists proposed in the Plan are likely to encourage this trend. Even with expected growth, overall housing stock is likely to increase by under 20% over the next ten years²²⁵. Other than in the most accessible parts of inner and outer London, the proposed maximum standards are above current car ownership levels. In this context, the Plan is unlikely to lead to an overall shortage of car parking within the housing stock, but rather adjust provision at a strategic level to reflect the trend towards reduced reliance on the car in London.

567. That said, there is evidence that in certain areas, insufficient residential parking provision leads to significant problems for residents. Particular concerns are raised about the standards proposed in the parts of London with PTAL 3, 4 and 5. In the latter (which only applies to 2% of outer London), new housing is required to be car free (other than for disabled residents). In the former two areas, where access to the public transport network is not as good, the maximum standards are 0.75 and 0.5 spaces per dwelling respectively. In outer London, even now a third of households do not own a car, and this proportion is likely to increase particularly in the more accessible areas. Therefore, the gradual reduction in the proportion of the housing stock without a parking space in those areas is unlikely to lead to a significant mismatch between overall supply and demand. Whilst area based street parking controls can be controversial, they can be successful in tackling problems at a local level.

²²⁴ NPPF paragraph 39 and written ministerial statement 25 March 2015.

²²⁵ Mayor's response to supplementary question 19 [NLP/EX/13].

568. Opportunity Areas will be subject to public transport improvements, and new homes will be focussed in the more accessible parts of them. The Mayor has suggested a change to make clear in paragraph 10.6.3A that the maximum standards are an average to be achieved for each Opportunity Area as a whole, with provision varying in different parts to reflect their accessibility. This provides sufficient flexibility whilst ensuring that the strategic approach is not undermined.
569. Parts G and H of policy T6.1 require all residential developments to provide parking for disabled persons, and set out mechanisms to ensure that provision at the outset is broadly in line with the current number of "blue badge" holders in London, with further additional spaces created when needs arise. This is consistent with policy D5, which requires at least 10% of new dwellings to meet building regulation M4(3), and will be effective in ensuring that the residential parking needs of disabled persons are met in a proportionate way.

Destination car parking

570. The Plan sets out maximum car parking standards for office, retail, hotel and leisure developments, as well as minimum requirements for disabled persons spaces for those and other commercial uses and social infrastructure. The maximum standards relate to main town centre uses, and are intended to be restrictive in order to influence people's choice of travel. That is a justified approach in principle given the direct relationship between the availability of destination parking and travel choice, and the accessibility of most town centres in London. There is no substantive evidence to indicate that any of the maximum standards would lead to highway safety problems, undermine viability, or result in developments that would be inaccessible.
571. Office developments are required to be car free in the CAZ and inner London, with different standards set for outer London and Opportunity Areas where some flexibility is provided by the Mayor's further suggested change described above. Parking at industrial developments of all types is expected to take account of the standards for offices but also the relevant employment density and trip-generating characteristics of the particular use which provides a strategic starting point without being unduly prescriptive. The first sentence of policy T6I, relating to redeveloped sites, is not intended to apply to industrial development; in order to avoid any ambiguity and therefore be effective this needs to be made explicit and we recommend accordingly [**PR51**].
572. The maximum standards for retail development do not distinguish between different types of shop, and they will clearly require a different approach to parking provision for some uses including supermarkets and out of centre retail parks. The main weekly food shop of households makes up over 50% of all transactions in some supermarkets. Evidence indicates that demand at peak times at some stores is for around one parking space per 10-20 square metres even in areas with very good public transport accessibility²²⁶. The requirement for car free retail development in the CAZ and all areas of PTAL 5-6, and a maximum of one space per 75 square metres in inner London and outer London Opportunity Areas, and one space per 50 square metres

²²⁶ Matter 84 statements from Lidl and Tesco.

elsewhere, will therefore be restrictive. However, the car parks at existing stores are no doubt one of the main reasons people choose to drive to those destinations. Policies SD7 and SD8 set out a town centre first approach, and limiting the number and impact of cars will enhance the quality of the environment and ultimately attract more people thereby supporting the vitality and viability of town centres.

573. Policy T6I seeks to reduce parking provision when sites are redeveloped to the maximum levels proposed in the Plan, rather than being re-provided at previous levels. This could affect the decision of some businesses, including supermarkets, whether to redevelop as it could potentially affect the future economic viability of the core business. The mixed use redevelopment of supermarkets and low density retail parks is encouraged by other policies in the Plan, and such schemes could make a valuable, albeit relatively modest, contribution towards meeting housing targets. The policy provides some flexibility for the redevelopment of retail sites outside town centres which are not well served by public transport, which will allow boroughs to take viability into account where necessary. There is no justification for allowing the re-provision of existing levels of parking on town centre sites as this would prevent the creation of higher quality, attractive places and is unnecessary given their accessibility by public transport.

Conclusion

574. Subject to our recommendations, policies T1 to T6.5 and T9, the transport schemes set out in Table 10.1, and the cycle and car parking standards set out in Tables 10.2 to 10.6 are justified and consistent with national policy. They should, therefore, be effective in helping to ensure that the development proposed in the Plan is delivered in a way that achieves Good Growth.

Is policy T8 relating to aviation and development at Heathrow and other airports consistent with national policy or otherwise justified?

575. Policy T8 deals with aviation and airports in London and the wider South East. Reference is made to Heathrow and London City Airport, and also Gatwick, Stansted, Luton and Southend, the latter four being outside the Plan area. As well as setting a strategic framework for local plans and development proposals in London, it seeks to inform and influence other processes and decisions to be made by various other parties.

576. The Mayor confirmed at the examination hearing session that the policy is intended to be consistent with, but “go beyond”, the NPPF and the *Airports National Policy Statement: new runway capacity and infrastructure at airports in the South East of England (June 2018)* (“ANPS”). The ANPS sets out planning policy for any airport nationally significant infrastructure project in the south east of England. In particular, the ANPS will be the primary basis for making decisions on any development consent applications for a new northwest runway at Heathrow Airport which is the Government’s preferred scheme.

577. Notwithstanding the Mayor’s further suggested changes published after the examination hearing sessions, much of policy T8 remains inconsistent with

national policy, and/or inappropriate in the context of the proper role of the Plan as a spatial development strategy that we discussed earlier in this report.

578. Parts A and B express qualified support for both the role of airports serving London and the case for additional aviation capacity in the south east of England. Whilst the statements are broadly consistent with national policy, they are essentially objectives rather than policies. A further suggested change refers to development plans and other strategies, but it is by no means clear what they are expected to do in relation to the objectives. Furthermore, the statements create uncertainty in terms of what, if any, implications they may have for development outside London including at and related to airports in the wider South East.
579. Part C states that the aviation industry should fully meet its external and environmental costs particularly in respect of noise, air quality and climate change. However, it does not specify how this objective is intended to be achieved, or what the implications are for local plans and planning decisions in London. Part C also refers to schemes being appropriately assessed, overriding public interest, and suitable alternative solutions. It is unclear whether this is intended to be a summary of the statutory environmental assessment process, or to introduce some other requirement.
580. Part D states that the Mayor will oppose the expansion of Heathrow Airport unless certain tests are met. This is fundamentally inconsistent with national policy which supports a specific expansion scheme. Furthermore, the requirement for there to be “no additional noise or air quality harm” is contrary to ANPS paragraph 2.18 which acknowledges that, whilst national targets for emissions and legal obligations on air quality will have to be met, there may be some harm. Part C goes on to require any benefits of future regulatory and technology improvement to be fairly shared with affected communities. How this is intended to be achieved is not stated, and the implications for the planning system are unclear.
581. Parts E and G deal with surface access and connectivity. In so far as they relate to Heathrow, they provide a brief summary of more detailed requirements in the ANPS. They may be relevant to other airports in London, but they do not seem to serve any specific purpose in that regard. It is not appropriate for the Plan to set out access requirements relating to airports outside London. The Plan’s strategic transport priorities, including indicative schemes, are set out elsewhere in the Plan.
582. Part F attempts to influence future decisions about air traffic movements and the use of airspace. This is outside the remit of the Plan, and appropriately dealt with by other regulatory regimes.
583. Part G advises that better use should be made of existing airport capacity. Whilst this may be a desirable objective, its spatial development implications are unclear.
584. Part I provides qualified support for development relating to general and business aviation. However, it attempts to rule out any weighing up of environmental harm with other material considerations in the context of other relevant policies, an approach which is not justified. Furthermore, the policy

also seeks to prevent “scheduled flights” being introduced at airports that do not currently offer such services. Paragraph 10.8.11 explains this in terms of significant impacts on local communities, but there is insufficient justification for such an approach.

585. Part J attempts to introduce a blanket ban on all new heliports other than for emergency services, but no substantive justification is provided. The policy also states that steps should be taken to reduce helicopters overflying London, without any indication of what the spatial development implications are or how it is intended to be implemented by boroughs or other relevant parties.

586. Due to the numerous soundness issues that are not addressed by the Mayor’s further suggested changes, we recommend that policy T8 and the reasoned justification be deleted in their entirety [PR53]. Consequential changes will need to be made to other parts of the Plan, including paragraph 2.1.62 regarding Opportunity Areas in the Heathrow / Elizabeth Line West growth corridor. The Mayor’s further suggested changes to paragraph 2.1.63 clarify that the indicative figures for jobs and homes in those Opportunity Areas will be reviewed in light of the airport expansion proposals which should ensure effectiveness.

587. In order that relevant local plans and development proposals support and facilitate the expansion of Heathrow Airport in accordance with national policy and policies T1 and T3, Table 10.1 should be modified to include the new northwest runway scheme. Appropriate reasoned justification should be added after paragraph 10.3.6; this should refer to the ANPS being the primary basis for making decisions on any development consent applications for that scheme [PR47].

588. Planning decisions relating to other development at or related to airports in London can be made in accordance with relevant statutory procedures, taking account as required of other relevant policies in the Plan and in local and neighbourhood plans as well as national policy²²⁷.

Conclusion

589. Policy T8 relating to aviation and development at Heathrow and other airports is not consistent with national policy or otherwise justified. The policy and reasoned justification should be deleted in their entirety. Table 10.1 should be modified to include the new northwest runway scheme at Heathrow.

Does Chapter 12, including policy M1 and Table 12.1, set out an effective approach to monitoring the implementation of the Plan?

590. The Mayor is required to monitor and collect information about the implementation of the Plan and matters relevant to its review, alteration or replacement²²⁸. Policy M1 refers to the use of Key Performance Indicators (“KPIs”) set out in Table 12.1 and the Annual Monitoring Report (“AMR”). The reasoned justification provides information about how the AMR, including the

²²⁷ ANPS and NPPF 2019.

²²⁸ GLA Act sections 339 and 346.

KPIs and other information, will be used to assess and describe whether the Plan is being implemented effectively.

591. Provided that the Plan is modified as we recommend, we are satisfied that it would be aspirational but realistic. However, achieving Good Growth will be challenging, not least because the successful implementation of the Plan's policies will require significant investment by the public and private sector to achieve the necessary scale and quality of development. Failure to achieve Good Growth, particularly in areas subject to significant development and change, would have a disproportionate effect on people with low incomes and from groups with protected characteristics. It is important, therefore, that monitoring is effective in indicating progress towards the Good Growth outcomes over time and in particular places.
592. The KPIs and associated measures cover a limited number of significant social, economic and environmental outputs and outcomes that are directly related to, and influenced by, policies in the Plan. They will, therefore, provide a succinct indication of whether the Plan is being effective in achieving a number of its key objectives. However, the reasoned justification makes it clear that the AMR will also include a significant amount of additional information and analysis, and that it will be accompanied by other monitoring activity.
593. The Mayor's further suggested changes clarify that this will include other performance measures linked to Good Growth objectives; all quantitative measures included in the Plan; tailored monitoring and investigations into specific places such as Opportunity Areas and Strategic Areas of Regeneration; and a range of data relating to the wider context including related to the Mayor's other strategies. Furthermore, the text commits the Mayor to including additional measures in the AMR informed by engagement with stakeholders. This should ensure that the AMR is a document that is useful to and valued by a wide range of people and organisations, in addition to being effective in informing the Mayor's decisions about a future review of the Plan.

Conclusion

594. We conclude, therefore, that Chapter 12 sets out an effective approach to monitoring the implementation of the Plan.

Should there be an immediate review of the London Plan?

595. The Mayor is required to review the Plan from time to time²²⁹. However, the Secretary of State's letter to the Mayor of 27 July 2018²³⁰ indicates an expectation that the Plan should be reviewed immediately once it has been published. This is in order that a revised plan has regard to new national policies in the 2019 NPPF at the earliest opportunity. As part of the examination we asked the Mayor to comment on how quickly such an exercise might be undertaken and what the implications might be²³¹. This is bearing in mind that he anticipates that a revised London Plan would be in place by

²²⁹ GLA Act section 340.

²³⁰ NLP/AD/31.

²³¹ NLP/EX/28.

2024/2025 anyway although the Mayor has undertaken to review the threshold for affordable housing and the minimum tenure mix by 2021.

596. How quickly a review might be undertaken would depend on its scope. Even if limited to housing targets there could be implications for other policies of the Plan which would need to be aligned. In any case, based on the experience of the FALP it is estimated that about 3 years would be required from start to finish. This includes the necessary preparation and evidence gathering as well as consultation and undertaking the processes prescribed in the GLA Act and the Regulations for an examination in public. These are not steps that can be short-circuited. Whilst the Mayor's view that summer of 2023 is the earliest that a revised Plan could be published is slightly pessimistic in our view, especially if work were to start straightaway, it is difficult to see how it could be done much before the end of 2022.

597. Requiring an immediate review may well deter some boroughs from updating their own local plans as they reason that it would be better to "wait and see" what the housing requirements from a revised Plan are. Furthermore, developers may also decide not to pursue sites that are consistent with the current Plan in favour of speculating that in future other opportunities will occur. There is some force in these points. We are especially conscious that the issue of resourcing for boroughs was a matter raised regularly that might also affect whether they embark on local plan production in the knowledge that some of the fundamental strategic policies are likely to change in the near future.

598. The Mayor also observes that an immediate review would divert GLA staff away from the task of seeking to implement this Plan which would be counter-productive. We have insufficient information to comment on the resourcing of the Mayor's planning functions but can see that it is likely that the focus would be on preparing the new Plan rather than on ensuring that this one delivers the Good Growth that it is promoting.

599. Furthermore, the position in London is that capacity for new housing development is finite. Indeed, the Plan relies on re-cycled land. The approach of sustainable intensification can only be taken so far without having an adverse impact on the environment, the social fabric of communities and their health and well-being. Therefore, in our view, there would be little to be gained from requiring an immediate review until such time as a full review of London's Green Belt has been undertaken as recommended to assess the potential for sustainable development there and whether and how the growth of London might be accommodated. Therefore we make no recommendation that an early or immediate review of the London Plan should be carried out.

What should the next steps be before the Plan is published?

600. The steps to be taken following the submission of our report to the Mayor are set out in the Regulations and we will not detail them here. Indeed, our involvement in the preparation of the London Plan ends at that point.

601. There is no provision in the GLA Act or Regulations for further public consultation before the end or after the examination, including on any modifications that we recommend. Rather, a process to finalise the Plan is set

out that involves the Mayor and the Secretary of State. Nor is there any expectation of further consultation in national policy or guidance, and the Mayor has made no public commitments to that as far as we are aware. All of the modifications to the draft Plan suggested by the Mayor and our recommendations, which are not binding on the Mayor, relate to matters raised in representations and/or that were discussed at examination hearings.

602. The Plan has been in the making for around three years and, in accordance with national policy, it is important that it is finalised as soon as possible. For all of these reasons, whilst we are aware that some may wish to have a further opportunity to comment on the Plan before it is finalised, we make no positive recommendation that further public consultation be carried out. That said, if the Mayor wishes to undertake further consultation, we are not aware of any legal impediment. Irrespective of that, the Mayor should, in our view, update the IIA as necessary in accordance with relevant legal requirements before the Plan is finalised for publication.

Overall Conclusion and Recommendation

603. Throughout this report we have recommended a number of modifications that we consider need to be made to the London Plan, in addition to those suggested by the Mayor, to ensure that it meets the tests of soundness. Those recommendations are all listed in the attached Appendix.

604. We therefore conclude that the draft new London Plan published for public consultation in December 2017 provides an appropriate basis for the strategic planning of Greater London provided that it is modified to reflect the Mayor's minor suggested changes (August 2018), the Mayor's further suggested changes (July 2019) and the recommendations that we have set out in this report and listed in the Appendix.

Roisin Barrett

William Fieldhouse

David Smith

This report is accompanied by an Appendix listing our Panel Recommendations.

Appendix 3



Ministry of Housing,
Communities &
Local Government

Sadiq Khan
Mayor of London
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Rt Hon Robert Jenrick
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13 March 2020

Dear Sadiq,

Thank you for sending me your Intention to Publish version of the London Plan (the Plan).

Every part of the country must take responsibility to build the homes their communities need. We must build more, better and greener homes through encouraging well-planned development in urban areas; preventing unnecessary urban sprawl so that we can protect the countryside for future generations. This means densifying, taking advantage of opportunities around existing infrastructure and making best use of brownfield and underutilised land.

Housing delivery in London under your mayoralty has been deeply disappointing, over the last three years housing delivery has averaged just 37,000 a year; falling short of the existing Plan target and well below your assessment of housing need. Over the same period, other Mayors such as in the West Midlands have gripped their local need for housing and recognised the opportunities this brings, leading significant increases in the delivery of homes.

Since you became Mayor, the price of an average new build home in London has increased by around £45,000, reaching £515,000 in 2018, 14 times average earnings. Clearly, the housing delivery shortfall you have overseen has led to worsening affordability for Londoners; and things are not improving, with housing starts falling a further 28 per cent last year compared to the previous.

Critical strategic sites have stalled, epitomised by your Development Corporation in Old Oak and Park Royal being forced to turn away £250 million of Government funding because of your inability to work successfully with the main landowner. You also turned away £1 billion of investment we offered to deliver Affordable Homes, because of the support and oversight that would accompany this. You have put a series of onerous conditions on estate regeneration schemes for them to be eligible for grant-funding, such as the requirement for residents' ballots. In attaching such conditions, you are jeopardising housing delivery and this approach will make it significantly more difficult to deliver the Plan's targets and homes needed.

Following the Planning Inspectorate's investigation of your Plan, they only deem your Plan credible to deliver 52,000 homes a year. This is significantly below your own identified need of around 66,000 homes and well below what most commentators think is the real need of London. As I have set out, the shortfall between housing need in London and the homes your Plan delivers has significant consequences for Londoners.

Leaving tens of thousands of homes a year needed but unplanned for will exacerbate the affordability challenges within and around the capital; making renting more expensive and setting back the

aspirations of Londoners to get on the housing ladder, make tackling homelessness and rough sleeping more challenging and harm the economic success of London.

Everyone should have the chance to save for and buy their own home so they can have a stake in society. In the short run this requires a proactive stance in building homes for ownership, including Shared Ownership and First Homes, and in parallel delivering a consistently high level of housing supply of all tenures. You should also be looking to deliver homes which people of different ages, backgrounds and situations in life can live in. Your Plan tilts away from this, towards one-bed flats at the expense of all else, driving people out of our capital when they want to have a family.

Your Plan added layers of complexity that will make development more difficult unnecessarily; with policies on things as small as bed linen. Prescription to this degree makes the planning process more cumbersome and difficult to navigate; in turn meaning less developments come forward and those that do progress slowly. One may have sympathy with some of individual policies in your Plan, but in aggregate this approach is inconsistent with the pro-development stance we should be taking and ultimately only serves to make Londoners worse off.

This challenging environment is exacerbated by your empty threats of rent controls, which by law you cannot introduce without Government consent. As we all know, evidence from around the world shows that rent controls lead to landlords leaving the market, poorer quality housing and soaring rents for anyone not covered by the controls.

I had expected you to set the framework for a step change in housing delivery, paving the way for further increases given the next London Plan will need to assess housing need by using the Local Housing Need methodology. This has not materialised, as you have not taken the tough choices necessary to bring enough land into the system to build the homes needed.

Having considered your Plan at length my conclusion is that the necessary decisions to bring more land into the planning system have not been taken, the added complexity will reduce appetite for development further and slow down the system, and throughout the Plan you have directly contradicted national policy. As you know, by law you must have regard to the need for your strategies to be consistent with national policies.

For these reasons I am left with no choice but to exercise my powers to direct changes.

Your Plan must be brought to the minimum level I would expect to deliver the homes to start serving Londoners in the way they deserve. However, this must be the baseline and given this, I ask that you start considering the next London Plan immediately and how this will meet the higher level and broader housing needs of London.

Directions

Due to the number of the inconsistencies with national policy and missed opportunities to increase housing delivery, I am exercising my powers under section 337 of the Greater London Authority Act 1999 to direct that you cannot publish the London Plan until you have incorporated the Directions I have set out at **Annex 1**. Should you consider alternative changes to policy to address my concerns, I am also content to consider these.

In addition to the attached Directions, I am taking this opportunity to highlight some of the specific areas where I think your Plan has fallen short of best serving Londoners.

Ambition: It is important that both Government and you as Mayor are seen to be leaders in supporting ambitious approaches to planning and development; and I am concerned that your Plan actively discourages ambitious boroughs. I am therefore Directing you to work constructively with ambitious London Boroughs and my Department to encourage and support the delivery of boroughs which strive to deliver more housing.

Small sites policy: The lack of credibility the Panel of Inspectors were able to attribute to your small sites policies resulted in a drop in the Plan's housing requirement of 12,713 homes per year. This was due to a combination of unattractive policies, such as 'garden grabbing' by opening up residential gardens for development, and unrealistic assumptions about the contribution of policies to the small sites target. I hope that where your small sites policies are appropriate, you are doing all you can to ensure sites are brought forward.

Industrial land: Planning clearly requires a judgement to be made about how to use land most efficiently, enabling sufficient provision for housing, employment and amenity. The Inspectors considered your industrial land policies to be unrealistic; taking an over-restrictive stance to hinder Boroughs' abilities to choose more optimal uses for industrial sites where housing is in high demand. I am directing you to take a more proportionate stance - removing the 'no net loss' requirement on existing industrial land sites whilst ensuring Boroughs bring new industrial land into the supply.

The mix of housing: Such a significant reduction in the overall housing requirement makes the need for the provision of an appropriate dwelling mix across London more acute. I am concerned that your Plan will be to the detriment of family sized dwellings which are and will continue to be needed across London. This is not just in relation to their provision but also their loss, particularly where family sized dwellings are subdivided into flats or redeveloped entirely. I am therefore Directing you to ensure this is a consideration of London Boroughs when preparing policies and taking decisions in relation to dwelling mix.

Optimising density: It is important that development is brought forward to maximise site capacity, in the spirit of and to compliment the surrounding area, not to its detriment. Sites cannot be looked at in isolation and Londoners need to be given the confidence that high density developments will be directed to the most appropriate sites; maximising density within this framework. Examples of this are gentle density around high streets and town centres, and higher density in clusters which have already taken this approach. I am therefore Directing you to ensure that such developments are consented in areas that are able to accommodate them.

Aviation: As you are aware, the Court of Appeal recently handed down judgment in the judicial review claims relating to the Airports National Policy Statement. The government is carefully considering the complex judgment and so does not consider it appropriate to make any direction in relation to Policy T8 Aviation at the present time. This is without prejudice to my power to make a direction under section 337 at any time before publication of the spatial development strategy, including in relation to Policy T8 Aviation.

Next steps: I look forward to receiving a revised version of your Intention to Publish Plan, containing the modifications necessary to conform with these Directions, for approval in accordance with section 337(8) of the Greater London Authority Act 1999.

Future Housing Delivery in London

I would like you to commit to maximising delivery in London, including through taking proactive steps to surpass the housing requirement in your Plan. This must include:

- Supporting ambitious boroughs to go beyond your Plan targets to bring them closer to delivering housing demand;
- A programme of work, with my Department, to kick-start stalled strategic sites; including bringing forward later-stage strategic land from your Strategic Housing Land Availability Assessment. If you are unable to persuade me that you can deliver the most significant sites, such as Old Oak Common, I will consider all options for ensuring delivery;
- Collaborating with public agencies to identify new sources of housing supply, including developing a more active role for Homes England;
- Actively encouraging appropriate density, including optimising new capacity above and around stations; and,

- Producing and delivering a new strategy with authorities in the wider South East to offset unmet housing need in a joined-up way.

The priority must be delivering the housing that Londoners need. I think the above steps will move us closer towards this and hope that you will build on these. However, I must be clear that without reassurances that you will raise your housing ambitions for the capital, I am prepared to consider all options, including new legislation if necessary.

Finally, I want to see you set a new standard for transparency and accountability for delivery at the local level. To achieve this I want you to commit to work with my Department and to provide: the fullest account of how the housing market and planning system is performing in London, where there are blockages and what is needed to unblock these, and what tools or actions can be undertaken to further increase housing delivery.

To meet this I expect:

- Regular meetings between you and I, and my ministers, to be supplemented by regular meetings between our respective officials.
- Quarterly, systematic reporting of progress on housing delivery across all tenures, devolved programmes and your planning pipeline across London. This should reflect what we have in place to track Homes England's approach to reporting.

The position I have taken and requirements I have outlined, are focused on ensuring the homes that Londoners need are planned for and delivered. Housing in our capital is simply too important for the underachievement and drift displayed under your Mayoralty, and now in your Plan, to continue.

I look forward to your reply detailing these commitments and to receiving your modified London Plan.

A handwritten signature in black ink that reads "Robert Jenrick." The signature is written in a cursive style with a horizontal line underneath.

THE RT HON ROBERT JENRICK MP

Direction	Intention to Publish London Plan Policy	Modification to Remedy National Policy Inconsistency New text is shown as bold red and deleted text as red-strikethrough	Statement of Reasons
DR1	Policy H10	<p>Modify H10.9 as follows:</p> <p>9) the need for additional family housing and the role of one and two bed units in freeing up existing family housing</p>	<p>London has a strong need for family homes, as set out in the SHMA, the modification set out in the direction is to address this need and help provide the homes needed – which otherwise will force families to move outside of London to find suitable housing and put further pressure on the areas surrounding the capital.</p> <p>The 2012 NPPF paragraph 50 states that plans should deliver a ‘wide choice of quality homes’ and ‘plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children,...)’. The modification to policy H10.9 will bring the London Plan back into conformity with National Policy by being more explicit about meeting the needs of this group.</p>
DR2	Policy D3 (and supporting text paragraph 3.3.1)	<p>Modify D3 as follows:</p> <p>A The design of the development must optimise site capacity. Optimising site capacity means ensuring that development takes the most appropriate form for the site. Higher density developments should be promoted in areas that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling.</p> <p>B Where there are existing clusters of high density buildings, expansion of the clusters should be positively considered by Boroughs. This could also include expanding Opportunity Area boundaries where appropriate.</p> <p>D Gentle densification should be actively encouraged by Boroughs in low- and mid- density locations to achieve a change in densities in the most appropriate way. This should be interpreted in the context of Policy H2.</p> <p>D A All development must make the best use of land by following a design led approach that optimises the capacity of sites, including site allocations. The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in <u>Policy D2 Infrastructure requirements for sustainable densities</u>), and that best delivers the requirements set out in Part B.</p> <p>E B Development proposals should:</p> <p>3.3.1 For London to accommodate the growth identified in this Plan in an inclusive and responsible way every new development needs to make the most efficient use of land. The design of the development must optimise site capacity. Optimising site capacity means ensuring that the development takes the most appropriate form for the site and that it is consistent with relevant planning objectives and policies. The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as Gypsy and Traveller gypsy and traveller pitches – is the optimum development for the site.</p>	<p>The 2012 NPPF sets out that policies “should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development...” (Paragraph 59)</p> <p>The policy as set out in the ItP London Plan gives little guidance as to the most suitable locations for higher density development – which could lead to inappropriate development or not maximising the potential of sites capable of delivering high density development. By not maximising the density of a site to reach its potential the Plan risks not delivering the homes and employment space that is needed.</p>

<p>DR3</p>	<p>Policy H2 (and supporting text paragraphs 4.2.1 to 4.2.14)</p>	<p>Delete 4.2.12 and 4.2.13 in their entirety</p>	<p>The ItP London Plan undermines national approach and will lead to confusion for applicants and decision makers. The Inspectors' report recommended the deletion of these paragraphs.</p> <p>Approach is inconsistent with Written Ministerial Statement (HCWS50) made by Minister of State for Housing and Planning Brandon Lewis on 28th November 2014 which sets out that affordable housing and tariff style contributions should not be sought on developments of 10 units or less.</p>
<p>DR4</p>	<p>Policy E4 Policy E5 Policy E7 Policy SD1 And relevant supporting text paragraphs</p>	<p>Modify E4 as follows</p> <p>C The retention, enhancement and provision of additional industrial capacity across the three categories of industrial land set out in Part B should be planned, monitored and managed. ., having regard to the industrial property market area and borough level categorisations in Figure 6.1 and Table 6.2. This should ensure that in overall terms across London there is no net loss of industrial floorspace capacity (and operational yard space capacity) within designated SIL and LSIS. Any release of industrial land in order to manage issues of long-term vacancy and to achieve wider planning objectives, including the delivery of strategic infrastructure, should be facilitated through the processes of industrial intensification, co-location and substitution set out in Policy E7 Industrial intensification, co-location and substitution and supported by Policy E5 Strategic Industrial Land.</p> <p>Modify supporting text paragraph 6.4.5 as follows</p> <p>6.4.5 Based upon this evidence, this Plan addresses the need to retain provide sufficient industrial, logistics and related capacity through its policies. by seeking, as a general principle, no overall net loss of industrial floorspace capacity across London in designated SIL and LSIS. Floorspace capacity is defined here as either the existing industrial and warehousing floorspace on site or the potential industrial and warehousing floorspace that could be accommodated on site at a 65 per cent plot ratio (whichever is the greater).</p> <p>Delete supporting text paragraphs 6.4.6 through 6.4.11</p> <p>Delete Table 6.2</p> <p>Delete Figure 6.1</p> <p>Add new supporting text paragraph 6.4.6</p> <p>6.4.6 Where possible, all Boroughs should seek to deliver intensified floorspace capacity in either existing and/or new appropriate locations supported by appropriate evidence.</p> <p>Add new supporting text 6.4.7</p> <p>6.4.7 All boroughs in the Central Services Area should recognise the need to provide essential services to the CAZ and Northern Isle of Dogs and in particular sustainable 'last mile' distribution/logistics, 'just-in-time' servicing (such as food service activities, printing, administrative and support services, office supplies, repair and maintenance), waste</p>	<p>At paragraph 421 of the Inspectors' Report, the Panel concluded that "the approach to meeting those needs set out in E4 to E7 is aspirational but may not be realistic" and this appears to be inconsistent with paragraph 7 of the NPPF 2012 which requires "that sufficient land of the right type is available in the right places and at the right time to support growth and innovation".</p> <p>This addition would make it easier for London Boroughs to identify a supply of industrial land to meet demand, or to replace other land that can subsequently be released for housing development. It also removes a target that was deemed 'may not be realistic' and therefore meets the 'effective' test of soundness.</p> <p>Relevant paragraphs in the 2012 NPPF are noted below;</p> <p>Paragraphs 7 and 17 on 'by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation' 'sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.'</p> <p>Paragraph 156 states that strategic policies should deliver the homes and jobs needed in the area and the provision of commercial development.</p> <p>Paragraph 161 states that the authority must assess 'the existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified needs.'</p>

management and recycling, and land to support transport functions. This should be taken into account when assessing whether substitution is appropriate.

Add new supporting text 6.4.8

6.4.8 Where industrial land vacancy rates are currently well above the London average, Boroughs are encouraged to assess whether the release of industrial land for alternative uses is more appropriate if demand cannot support industrial uses in these locations. Where possible, a substitution approach to alternative locations with higher demand for industrial uses is encouraged.

Modify E5 as follows

B Boroughs, in their Development Plans, should:

...

4) Strategically coordinate Development Plans to identify opportunities to substitute Strategic Industrial Land where evidence that alternative, more suitable, locations exist. This release must be carried out through a planning framework or Development Plan Document review process and adopted as policy in a Development Plan or as part of a coordinated masterplanning process in collaboration with the GLA and relevant borough. All Boroughs are encouraged to evaluate viable opportunities to provide additional industrial land in new locations to support this process. This policy should be applied in the context of Policy E7.

~~D Development proposals for uses in SILs other than those set out in Part A of Policy E4 Land for industry, logistics and services to support London's economic function, (including residential development, retail, places of worship, leisure and assembly uses), should be refused except in areas released through a strategically co-ordinated process of SIL consolidation. This release must be carried out through a planning framework or Development Plan Document review process and adopted as policy in a Development Plan or as part of a coordinated masterplanning process in collaboration with the GLA and relevant borough.~~

Modify E7 as follows

D The processes set out in Parts B and C above must ensure that:

~~1) the industrial uses within the SIL or LSIS are intensified to deliver an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing~~

- 1) the industrial and related activities on-site and in surrounding parts of the SIL, LSIS or Non-Designated Industrial Site are not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation noting that many businesses have 7-day/24-hour access and operational requirements
- 2) the intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied
- 3) appropriate design mitigation is provided in any residential element to ensure compliance with 1 and 2 above with particular consideration given to:
 - a. safety and security
 - b. the layout, orientation, access, servicing and delivery arrangements of the uses in order to minimise conflict
 - c. design quality, public realm, visual impact and amenity for residents
 - d. agent of change principles
 - e. vibration and noise
 - f. air quality, including dust, odour and emissions and potential contamination.

Modify 6.7.2

~~Whilst the majority of land in SILs should be retained and intensified for the industrial type functions set out in Part A of Policy E4 Land for industry, logistics and services to support London's economic function, t~~There may be scope for selected parts of SILs or LSISs to be consolidated **or appropriately substituted**. This should be done through a carefully co-ordinated plan-led approach ~~(in accordance with Parts B and D of Policy E7 Industrial intensification, colocation and substitution)~~ to deliver an intensification of industrial and related uses in the consolidated SIL or LSIS and facilitate the release of some land for a mix of uses including residential. Local Plan policies' maps and/or OAPFs and masterplans should indicate clearly:

- i. the area to be retained and intensified as SIL or LSIS (and to provide future capacity for the uses set out in Policy E5 Strategic Industrial Locations (SIL) and Policy E6 Locally Significant Industrial Sites) and
- ii. the area to be released from SIL or LSIS (see illustrative examples in Figure 6.3). Masterplans should cover the whole of the SIL or LSIS, and should be informed by the operational requirements of existing and potential future businesses.

Modify supporting text paragraphs for policy SD1 as follows

2.1.16 Southwark is preparing an Area Action Plan (AAP) which will set out how the BLE will enable significant residential and employment growth. The Old Kent Road OA contains the last remaining significant areas of Strategic Industrial Locations that lie in close proximity to the CAZ and the only SILs within Southwark. The AAP should ~~plan for no net loss of industrial floorspace capacity and~~ set out how industrial land can be intensified and provide space for businesses that need to relocate from any SIL identified for release. Areas that are released from SIL should seek to co-locate housing with industrial uses, or a wider range of commercial uses within designated town centres. Workspace for the existing creative industries should also be protected and supported.

2.1.33 The Planning Framework should quantify the full development potential of the area as a result of Crossrail 2. It should ensure that industrial, logistics and commercial uses continue to form part of the overall mix of uses in the area, ~~with no net loss of industrial floorspace capacity,~~ and that opportunities for intensification of industrial land and co-location of industrial and residential uses are fully explored. Tottenham and Walthamstow contain clusters of creative industries which should be protected and supported. The Planning Framework should also protect and improve sustainable access to the Lee Valley Regional Park and reservoirs, and ensure links through to Hackney Wick and the Lower Lea Valley. Planning frameworks should include an assessment of any effects on the Epping Forest Special Area of Conservation and appropriate mitigation strategies.

2.1.53 Housing Zone status and investment by Peabody in estate renewal in the area will improve the quality of the environment and bring new housing opportunities. To deliver wider regeneration benefits to Thamesmead, other interventions to support the growth of the Opportunity Area are needed. These include: the redevelopment and intensification of employment sites to enable a range of new activities and workspaces to be created in parallel with new housing development; a review of open space provision in the area to create better quality, publicly accessible open spaces; the creation of a new local centre around Abbey Wood station, the revitalisation of Thamesmead town centre and Plumstead High Street; and improved local transit connections. ~~The Planning Framework should ensure that there is no net loss of industrial floorspace capacity.~~

2.1.56 Industrial and logistics uses will continue to play a significant role in the area. ~~The Planning Framework should ensure that there is no net loss of industrial floorspace capacity, and that industrial uses are retained and intensified, and form part of the mix in redevelopment proposals.~~ Belvedere is recognised as having potential as a future District centre.

<p>DR5</p>	<p>Policy G2 (and supporting paragraphs 8.2.1 and 8.2.2)</p>	<p>Modify Policy G2 as follows:</p> <p>A. The Green Belt should be protected from inappropriate development:</p> <ol style="list-style-type: none"> 1. development proposals that would harm the Green Belt should be refused except where very special circumstances exist; 2. subject to national planning policy tests, the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported. <p>B. Exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a local plan. The extension of the Green Belt will be supported, where appropriate. Its de-designation will not be supported.</p>	<p>Policy G2 as set out in the ItP London Plan is not consistent with national policy and will lead to confusion for applicants, communities and decision makers. The policy as it stands is inconsistent with the 2012 NPPF (paras 79 – 92) due to the lack of reference to exceptional circumstances.</p> <p>This inconsistency was noted in the Inspectors' Report and their recommendation PR36 will resolve these inconsistencies.</p>
<p>DR6</p>	<p>Policy G3 (and supporting text paragraphs 8.3.1 through 8.3.4)</p>	<p>Modify Policy G3 as follows:</p> <p>A. Metropolitan Open Land (MOL) is afforded the same status and level of protection as Green Belt:</p> <ol style="list-style-type: none"> 1) Development proposals that would harm MOL should be refused. MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt. 2) boroughs should work with partners to enhance the quality and range of uses of MOL. <p>B. The extension of MOL designations should be supported where appropriate. Boroughs should designate MOL by establishing that the land meets at least one of the following criteria:</p> <ol style="list-style-type: none"> 1) it contributes to the physical structure of London by being clearly distinguishable from the built-up area 2) it includes open air facilities, especially for leisure, recreation, sport, the arts and cultural activities, which serve either the whole or significant parts of London 3) it contains features or landscapes (historic, recreational, biodiverse) of either national or metropolitan value 4) it forms part of a strategic corridor, node or a link in the network of green infrastructure and meets one of the above criteria. <p>C. Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs. MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, ensuring that the quantum of MOL is not reduced, and that the overall value of the land designated as MOL is improved by reference to each of the criteria in Part B.</p>	<p>Mayor's use of Green Belt definition and prohibition of a net loss is not consistent with the NPPF and is likely to lead to confusion for applicants, communities and decision makers.</p> <p>The Inspectors' report recommends that the policy is made consistent with National Policy as set out in paragraphs 79-92 of the 2012 NPPF.</p>
<p>DR7</p>	<p>Policy H14 (and supporting text paragraphs 4.14.1 through 4.14.13)</p>	<p>Delete Policy B in its entirety.</p> <p>Modify Policies C and D as follows:</p> <p>C. Boroughs that have not undertaken a needs assessment since 2008 should use the figure of need for Gypsy and Traveller gypsy and traveller accommodation provided in Table 4.4 as identified need for pitches until a needs assessment, using the definition set out above, is undertaken as part of their Development Plan review process.</p> <p>D. Boroughs that have undertaken a needs assessment since 2008 should update this based on the definition set out above as part of their Development Plan review process</p> <p>Delete supporting text paragraphs 4.14.1, 4.14.2, 4.14.3, 4.14.4, 4.14.7</p>	<p>The policy is inconsistent with national policy set out in the Planning Policy for Traveller Sites (PPTS) (August 2015). The policy gives a wider definition of "gypsies and travellers" compared to that in Annex 1 of the PPTS including those who have permanently settled.</p> <p>The panel of Inspectors examining the plan concluded that the Mayor failed to demonstrate that London was so distinctly different to elsewhere in the country to justify a departure from national policy.</p>

		<p>In Policies A, E and G and supporting text paragraphs 4.14.5, 4.14.6, 4.14.8, 4.14.9, 4.14.11 and 4.14.12:</p> <p>Replace the terms ‘Gypsy and Traveller’ and ‘Gypsies and Travellers’ respectively with the phrases gypsy and traveller and gypsies and travellers in line with PPTS.</p>	<p>The panel highlighted that a different definition would create anomalies with individuals defined differently for planning purposes on whether they are assessed by a district outside London or one of the boroughs. This could also impact on proposals for joint working as set out in the PPTS.</p> <p>The Housing and Planning Act 2016 replaced the duty to assess the needs of gypsy and travellers, with a duty on local housing authorities to consider the needs of people residing in or resorting to their District with respect to the provision of sites on which caravans are stationed. Therefore, the needs of those outside the PPTS definition must be considered as part of this assessment.</p> <p>A Written Ministerial Statement (WMS) of 22 July 2015 set out that those travellers who do not fall within the definition set out in the PPTS should have their accommodation needs addressed under the provisions of the National Planning Policy Framework.</p> <p>As a consequence of directing the Mayor to accept the Inspector’s recommendations and to delete Part B of the Policy we are also seeking a direction to the proposed Policy H14(C) and (D) as the wording requires authorities to undertake a needs assessment in accordance with the proposed definition in Part (B) of the Policy. We are also ensuring that references to gypsies and travellers are consistent in line with PPTS.</p>						
<p>DR8</p>	<p>Introducing the Plan A New Plan</p>	<p>Modify 0.0.21:</p> <p>“The Plan provides an appropriate spatial strategy that plans for London’s growth in a sustainable way and has been found sound by the planning inspectors through the examination in public. The housing targets set out for each London Borough are the basis for planning for housing in London. Therefore, boroughs do not need to revisit these figures as part of their local plan development, unless they have additional evidence that suggests they can achieve delivery of housing above these figures whilst remaining in line with the strategic policies established in this plan.”</p>	<p>The text as set out in the ItP London plan will potentially discourage London Boroughs that may be able to exceed their housing target. The approach is not consistent with the 2012 NPPF paras 46, 153, 156 and 159. due to the Plan planning for significantly below London’s housing need.</p>						
<p>DR9</p>	<p>Table 10.3</p>	<p>Delete Table 10.3 Maximum Parking Standards and replace with the table below:</p> <table border="1" data-bbox="825 1780 1733 1980"> <thead> <tr> <th data-bbox="825 1780 1157 1843">Location</th> <th data-bbox="1157 1780 1472 1843">Maximum Parking Provision*</th> <th data-bbox="1472 1780 1733 1843">Number of Beds</th> </tr> </thead> <tbody> <tr> <td data-bbox="825 1843 1157 1980">Central Activities Zone Inner London Opportunity Areas Metropolitan and Major Town Centres</td> <td data-bbox="1157 1843 1472 1980">Car free~</td> <td data-bbox="1472 1843 1733 1980">N/A</td> </tr> </tbody> </table>	Location	Maximum Parking Provision*	Number of Beds	Central Activities Zone Inner London Opportunity Areas Metropolitan and Major Town Centres	Car free~	N/A	<p>The parking standards as set out in the ItP London Plan are inconsistent with national policy. The 2016 Minor Alterations to the London Plan introduced Parking Standards for residential policy to meet the requirements as per the Written Ministerial Statement of 25 March 2015 that ‘clear and compelling justification’ is required when introducing parking standards. The Mayor has not</p>
Location	Maximum Parking Provision*	Number of Beds							
Central Activities Zone Inner London Opportunity Areas Metropolitan and Major Town Centres	Car free~	N/A							

		<table border="1"> <tr> <td data-bbox="825 92 1160 159">All areas of PTAL 5 – 6 Inner London PTAL 4</td> <td data-bbox="1160 92 1472 159"></td> <td data-bbox="1472 92 1733 159"></td> </tr> <tr> <td data-bbox="825 159 1160 226">Inner London PTAL 3</td> <td data-bbox="1160 159 1472 226">Up to 0.25 spaces per dwelling</td> <td data-bbox="1472 159 1733 226">N/A</td> </tr> <tr> <td data-bbox="825 226 1160 327">Inner London PTAL 2 Outer London Opportunity Areas</td> <td data-bbox="1160 226 1472 327">Up to 0.5 spaces per dwelling</td> <td data-bbox="1472 226 1733 327">N/A</td> </tr> <tr> <td data-bbox="825 327 1160 394">Inner London PTAL 0 – 1</td> <td data-bbox="1160 327 1472 394">Up to 0.75 spaces per dwelling</td> <td data-bbox="1472 327 1733 394">N/A</td> </tr> <tr> <td data-bbox="825 394 1160 462">Outer London PTAL 2-4</td> <td data-bbox="1160 394 1472 462">Up to 0.75 space per dwelling</td> <td data-bbox="1472 394 1733 462">1-2</td> </tr> <tr> <td data-bbox="825 462 1160 529">Outer London PTAL 2-4</td> <td data-bbox="1160 462 1472 529">Up to 1 space per dwelling</td> <td data-bbox="1472 462 1733 529">3+</td> </tr> <tr> <td data-bbox="825 529 1160 596">Outer London PTAL 0 – 1</td> <td data-bbox="1160 529 1472 596">Up to 1.5 spaces per dwelling</td> <td data-bbox="1472 529 1733 596">1-2</td> </tr> <tr> <td data-bbox="825 596 1160 663">Outer London PTAL 0 – 1</td> <td data-bbox="1160 596 1472 663">Up to 1.5 spaces per dwelling ^</td> <td data-bbox="1472 596 1733 663">3+</td> </tr> <tr> <td colspan="3" data-bbox="825 663 1733 1003"> <p>* Where Development Plans specify lower local maximum standards for general or operational parking, these should be followed.</p> <p>~ With the exception of disabled persons parking, see Part G Policy T6.1 Residential Parking</p> <p>^ Boroughs should consider higher levels of provision where this would support additional family housing.</p> </td> </tr> </table>	All areas of PTAL 5 – 6 Inner London PTAL 4			Inner London PTAL 3	Up to 0.25 spaces per dwelling	N/A	Inner London PTAL 2 Outer London Opportunity Areas	Up to 0.5 spaces per dwelling	N/A	Inner London PTAL 0 – 1	Up to 0.75 spaces per dwelling	N/A	Outer London PTAL 2-4	Up to 0.75 space per dwelling	1-2	Outer London PTAL 2-4	Up to 1 space per dwelling	3+	Outer London PTAL 0 – 1	Up to 1.5 spaces per dwelling	1-2	Outer London PTAL 0 – 1	Up to 1.5 spaces per dwelling ^	3+	<p>* Where Development Plans specify lower local maximum standards for general or operational parking, these should be followed.</p> <p>~ With the exception of disabled persons parking, see Part G Policy T6.1 Residential Parking</p> <p>^ Boroughs should consider higher levels of provision where this would support additional family housing.</p>			<p>submitted clear and compelling evidence that the policy from the 2016 MALP should be changed so provision has been made to allow Boroughs to support higher levels of provision where this meets identified housing needs, the approach to lower PTAL Outer London areas has been made more flexible and parking requirements for family housing in Outer London have been differentiated.</p> <p>Reducing parking spaces for homes risks residents being forced to park on street and causing congestion to London’s road network and adversely impacting on the cyclability of roads in outer London. It also fails to reflect the need future housing will have to provide electric charging points to meet the Government target of only electric vehicles being available from 2035.</p>
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DR10	Policy T6.3 Retail parking	<p>Modify T6.3 as follows:</p> <p>A. The maximum parking standards set out in Table 10.5 should be applied to new retail development, unless alternative standards have been implemented in a Borough Plan through the application of Policy G below. New retail development should avoid being car-dependent and should follow a town centre first approach, as set out in Policy SD7 Town centres: development principles and Development Plan Documents.</p> <p>...</p> <p>G. Boroughs should consider alternative standards where there is clear that evidence that the standards in Table 10.5 would result in:</p> <ol style="list-style-type: none"> a. A diversion of demand from town centres to out of town centres, undermining the town centres first approach. b. A significant reduction in the viability of mixes-use redevelopment proposals in town centre. 	<p>Paragraph 39 of the 2012 NPPF is clear that in setting local parking standards for non-residential development, policies should take into account:</p> <ol style="list-style-type: none"> (a) the accessibility of the development; (b) the type, mix and use of development; (c) the availability of and opportunities for public transport; (d) local car ownership levels; and (e) an overall need to reduce the use of high-emission vehicles <p>As was raised in a number of representations, local car ownership rates and accessibility in a number of town centre locations would see the result of Table 10.5’s implementation divert traffic to out-of-town locations and increase the length of trips. It was also raised that in relation to the type use and mix of development that the policies could reduce the viability of mixed-use redevelopment. As a result the proposed Direction will allow Boroughs to diverge from the Mayor’s standards in Table 10.5 where these potential negative impacts can be evidenced.</p>																											

<p>DR11</p>	<p>Policy H1 Supporting text paragraph 4.1.11</p>	<p>Delete 4.1.11 in its entirety</p>	<p>The Plan's text undermines the national HDT approach and is likely to lead to confusion for applicants, communities and decision makers. It does not provide an effective framework for Boroughs, in line with paragraph 182 of the NPPF.</p> <p>The Housing Delivery Test is a key Government policy to help drive the delivery of new homes. The ItP London Plan in its current state is not consistent with the Housing Delivery Test Rulebook or the 2019 NPPF which first introduced the Housing Delivery Test.</p>
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Appendix 4

MAYOR OF LONDON

Rt Hon Robert Jenrick MP

Secretary of State for Housing, Communities
and Local Government
Ministry of Housing, Communities and Local Government
2 Marsham Street
London SW1P 4DF

Date: 24 April 2020

Dear Robert,

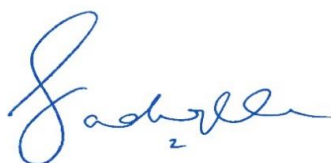
I am writing in relation to the directions that you set out under Section 337 of the GLA Act 1999 with regards to the Intend to Publish version of the London Plan.

I am mindful of the need to support the development industry and the wider economy in the recovery from the Coronavirus crisis. Certainty for the industry, including the Spatial Development Strategy and statutory framework they are working to, is crucial to this, so we must work together constructively to publish the London Plan as quickly as possible.

With that in mind, I have asked my officials to start conversations with your officials about the directions in line with your commitment to consider alternative policy changes in relation to these. I believe some amendments will be required to ensure the directions are workable in practice. My officials have now assessed their specific impacts and we consider amendments are needed to the modifications in order to remove policy ambiguities and achieve the necessary outcomes. This assessment has included identifying information that your officials did not have access to when drafting the directions and we are happy to share it to underpin the discussions.

Whilst I have instructed my officials to engage positively and constructively, I am hopeful that a form of wording we all find acceptable can be found as it would be hard for me to propose publishing my Plan if I believed this would be detrimental to the needs of London.

Yours sincerely,



Sadiq Khan

Mayor of London

Cc: Paul Scully MP, Minister for London
Sir Edward Lister, 10 Downing Street

Appendix 5



Ministry of Housing,
Communities &
Local Government

Sadiq Khan
Mayor of London
City Hall
The Queens Walk
London SE1 2AA.

Rt Hon Robert Jenrick
*Secretary of State for Housing, Communities and
Local Government*

**Ministry of Housing, Communities & Local
Government**

Fry Building
2 Marsham Street
London
SW1P 4DF

Tel: 0303 444 3450
Email: robert.jenrick@communities.gov.uk

www.gov.uk/mhclg

10 December 2020

Dear Sadiq,

London Plan

Thank you for your letters of 21 August and 9 December 2020 regarding the London Plan. As you will be aware, my officials have been in discussion with your officers during the intervening time and have worked constructively to find a way through the detail of ensuring that the London Plan will be consistent with national planning policy. I hope that there is now a common understanding of how my 11 Directions, issued on 13th March will be addressed and I attach a list showing where I accept your proposed wording and where you should keep to the original Directions.

We agree that moving towards adoption of the London Plan would help families and businesses in London to build back better. Since I directed you on your draft plan in March it has become clear that there are some further issues. Therefore, I am issuing two further Directions. Firstly, in light of the profound impact Covid-19 is having on London, and other towns and cities, I am issuing a further Direction in relation to Direction DR4, specifically regarding updated para 6.4.8. This is a modest amendment to my previous direction which will provide boroughs in the difficult position of facing the release of Green Belt or Metropolitan Open Land with a greater freedom to consider the use of Industrial Land in order to meet housing needs.

Second, I am issuing a new Direction regarding Policy D9 (Tall Buildings). There is clearly a place for tall buildings in London, especially where there are existing clusters. However, there are some areas where tall buildings don't reflect the local character. I believe boroughs should be empowered to choose where tall buildings are built within their communities. Your draft policy goes some way to dealing with this concern. In my view we should go further and I am issuing a further Direction to strengthen the policy to ensure such developments are only brought forward in appropriate and clearly defined areas, as determined by the boroughs whilst still enabling gentle density across London. I am sure that you share my concern about such proposals and will make the required change which will ensure tall buildings do not come forward in inappropriate areas of the capital.

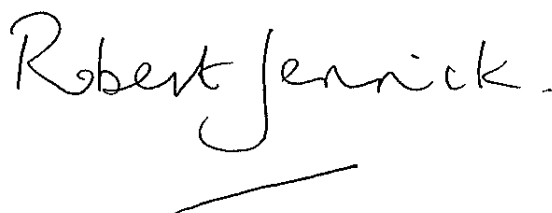
Next Steps

I am pleased that you share my sense of urgency in getting the London Plan published. I would be grateful if you could re-submit your Intention to Publish version of the Plan with amendments that address the 11 previous Directions and the two additional Directions. I will then be in a position to formally agree to the publication of the London Plan.

Once published, the London Plan will be an important tool in helping to drive housing delivery, economic recovery and sustainable development across London.

You will recall that in my letter of 13th March I required you to commit to a range of activities to support future housing growth in London. I am pleased that the communication between our teams is ongoing and positive. I would like to see details of work on a strategy with the wider south east authorities.

I look forward to your reply detailing these commitments and to receiving your modified Intention to Publish version of the London Plan.

A handwritten signature in black ink that reads "Robert Jenrick." The signature is written in a cursive style with a long horizontal stroke underneath.

RT HON ROBERT JENRICK MP

Annex A

Updated Changes to London Plan as a result of Directions

DR1	Policy H10 (A)(9)	<u>the need for additional family housing and</u> the role of one and two bed units in freeing up <u>existing</u> family housing.
DR2	Policy D3 (A) and part of (B)	<p>The design-led approach</p> <p>A All development must make the best use of land by following a design led approach that optimises the capacity of sites, including site allocations. <u>Optimising site capacity means ensuring that development is of the most appropriate form and land use for the site.</u> The design-led approach requires consideration of design options to determine the most appropriate form of development that responds to a site’s context and capacity for growth, and existing and planned supporting infrastructure capacity (as set out in <u>Policy D2 Infrastructure requirements for sustainable densities</u>), and that best delivers the requirements set out in Part <u>D B</u>.</p> <p><u>B Higher density developments should generally be promoted in locations that are well connected to jobs, services, infrastructure and amenities by public transport, walking and cycling, in accordance with Policy D2 Infrastructure requirements for sustainable densities. Where these locations have existing areas of high density buildings, expansion of the areas should be positively considered by Boroughs where appropriate. This could also include expanding Opportunity Area boundaries where appropriate.</u></p> <p><u>C In other areas, incremental densification should be actively encouraged by Boroughs to achieve a change in densities in the most appropriate way. This should be interpreted in the context of Policy H2.</u></p> <p><u>B D</u> Development proposals should:</p>
DR2	Paragraph 3.3.1	<p>For London to accommodate the growth identified in this Plan in an inclusive and responsible way every new development needs to make the most efficient use of land <u>by optimising site capacity. This means ensuring the development’s form is the most appropriate for the site and land uses meet identified needs. The design of the development must optimise site capacity. Optimising site capacity means ensuring that the development</u></p>

		<p>takes the most appropriate form for the site and that it is consistent with relevant planning objectives and policies. The optimum capacity for a site does not mean the maximum capacity; it may be that a lower density development – such as Gypsy and Traveller pitches – is the optimum development for the site.</p>
DR3	Paragraph 4.2.12-13	Delete Paragraph 4.2.12 and 4.2.13, re-number Paragraph 4.2.14
DR4	Policy E4(C) including footnote 103	<p>The retention, enhancement and provision of additional industrial capacity across the three categories of industrial land set out in Part B should be planned, monitored and managed, having regard to the industrial property market area and borough-level categorisations in Figure 6.1 and Table 6.2. This should ensure that in overall terms across London there is no net loss of industrial¹⁰³ floorspace capacity (and operational yard space capacity) within designated SIL and LSIS. Any release of industrial land in order to manage issues of long-term vacancy and to achieve wider planning objectives, including the delivery of strategic infrastructure, should be facilitated through the processes of industrial intensification, co-location and substitution set out in <u>Policy E7 Industrial intensification, co-location and substitution</u> and supported by Policy E5 Strategic Industrial Locations (SIL).</p> <p>¹⁰³ Defined as the overall range of uses set out in Part A of Policy E4 Land for industry, logistics and services to support London's economic function</p>
DR4	Paragraph 6.4.5 including footnote 108	<p>Based upon this evidence, this Plan addresses the need to retain provide sufficient industrial, logistics and related capacity through its policies, by seeking, as a general principle, no overall net loss of industrial floorspace capacity across London in designated SIL and LSIS. Floorspace capacity is defined here as either the existing industrial and warehousing floorspace on site or the potential industrial and warehousing floorspace that could be accommodated on site at a 65 per cent plot ratio¹⁰⁸ (whichever is the greater).</p> <p>¹⁰⁸ Defined as total proposed industrial floorspace (see Part A), divided by the total proposed site area. Source: London Employment Sites Database, CAG Consultants, 2017: 65 per cent is the default plot ratio assumption for industrial and warehousing sites</p>
DR4	Paragraphs 6.4.6 to 6.4.11	Delete para 6.4.6 – 6.4.11 and replace with the following: <u>6.4.6 Where possible, all Boroughs should seek to deliver intensified floorspace capacity in either existing</u>

	including footnote 110	<p><u>and/or new appropriate locations supported by appropriate evidence.</u></p> <p><u>6.4.7 All boroughs in the Central Services Area should recognise the need to provide essential services to the CAZ and Northern Isle of Dogs and in particular sustainable ‘last mile’ distribution/ logistics, ‘just-in-time’ servicing (such as food service activities, printing, administrative and support services, office supplies, repair and maintenance), waste management and recycling, and land to support transport functions. This should be taken into account when assessing whether substitution is appropriate.</u></p> <p><u>6.4.8 Where industrial land vacancy rates are currently well above the London average, Boroughs are encouraged to assess whether the release of industrial land for alternative uses is more appropriate if demand cannot support industrial uses in these locations. Where possible, a substitution approach to alternative locations with higher demand for industrial uses is encouraged.</u></p>
DR4	Table 6.2	Delete table setting out borough categories for industrial land release/retention
DR4	Figure 6.1	Delete map showing setting out borough categories for industrial land release/retention
DR4	Policy E5(B)(4)	<u>4) strategically coordinate Development Plans to identify opportunities to substitute industrial capacity and function of Strategic Industrial Locations where evidence that alternative, more suitable, locations exist. This release must be carried out through a planning framework or Development Plan Document review process and adopted as policy in a Development Plan. All Boroughs are encouraged to evaluate viable opportunities to provide additional industrial land in new locations to support this process. This policy should be applied in the context of Policy E7 Industrial intensification, co-location and substitution.</u>
DR4	Policy E5(D) including renumbering of E5(E) as E5(D)	Development proposals for uses in SILs other than those set out in Part A of Policy E4 Land for industry, logistics and services to support London’s economic function, (including residential development, retail, places of worship, leisure and assembly uses), should be refused except in areas released through a strategically co-ordinated process of SIL consolidation. This release must be carried out through a

		<p>planning framework or Development Plan Document review process and adopted as policy in a Development Plan or as part of a co-ordinated masterplanning process in collaboration with the GLA and relevant borough.</p> <p>E</p>
DR4	Policy E7(C)	<p>... Mixed-use development proposals on Non-Designated Industrial Sites which co-locate industrial, storage or distribution floorspace with residential and/or other uses should also meet the criteria set out in Part Ds D2 to D4 below.</p>
DR4	Policy E7(D)	<p>The processes set out in Parts B and C above must ensure that:</p> <p>1) the industrial uses within the SIL or LSIS are intensified to deliver an increase (or at least no overall net loss) of capacity in terms of industrial, storage and warehousing floorspace with appropriate provision of yard space for servicing</p> <p>2) the industrial and related activities on-site and in surrounding parts of the SIL, LSIS or Non-Designated Industrial Site are not compromised in terms of their continued efficient function, access, service arrangements and days/hours of operation noting that many businesses have 7-day/24-hour access and operational requirements</p> <p>23) the intensified industrial, storage and distribution uses are completed in advance of any residential component being occupied</p> <p>34) appropriate design mitigation is provided in any residential element to ensure compliance with 1 and 2 above with particular consideration given to:</p> <p>a) safety and security</p> <p>b) the layout, orientation, access, servicing and delivery arrangements of the uses in order to minimise conflict</p> <p>c) design quality, public realm, visual impact and amenity for residents</p> <p>d) agent of change principles</p> <p>e) vibration and noise</p> <p>f) air quality, including dust, odour and emissions and potential contamination.</p>

DR4	Paragraph 6.7.2	<p>Whilst the majority of land in SILs should be retained and intensified for the industrial-type functions set out in Part A of Policy E4 Land for industry, logistics and services to support London's economic function, † there may be scope for selected parts of SILs or LSISs to be consolidated <u>or appropriately substituted</u>. This should be done through a carefully co-ordinated plan-led approach (in accordance with Parts B and D of Policy E7¹ Industrial intensification, co-location and substitution) to deliver an intensification of industrial and related uses in the consolidated SIL or LSIS and facilitate the release of some land for a mix of uses including residential. Local Plan policies' maps and/or OAPFs and masterplans <u>(as relevant)</u> should indicate clearly:</p> <p>i. the area to be retained, <u>substituted</u> and/or intensified as SIL or LSIS (and to provide future capacity for the uses set out in <u>Policy E5 Strategic Industrial Locations (SIL)</u> and <u>Policy E6 Locally Significant Industrial Sites</u>) and</p> <p>ii. the area to be released from SIL or LSIS (see illustrative examples in Figure 6.3). Masterplans should cover the whole of the SIL or LSIS, and should be informed by the operational requirements of existing and potential future businesses.</p>
DR4	Paragraph 2.1.16	<p>Southwark is preparing an Area Action Plan (AAP) which will set out how the BLE will enable significant residential and employment growth. The Old Kent Road OA contains the last remaining significant areas of Strategic Industrial Locations that lie in close proximity to the CAZ and the only SILs within Southwark. The AAP should plan for no net loss of industrial floorspace capacity and set out how industrial land can be intensified and provide space for businesses that need to relocate from any SIL identified for release. Areas that are released from SIL should seek to co-locate housing with industrial uses, or a wider range of commercial uses within designated town centres. Workspace for the existing creative industries should also be protected and supported.</p>
DR4	Paragraph 2.1.33	<p>The Planning Framework should quantify the full development potential of the area as a result of Crossrail 2. It should ensure that industrial, logistics and commercial uses continue to form part of the overall mix of uses in the area, with no net loss of industrial floorspace capacity, and that opportunities for intensification of industrial land and co-location of industrial and residential uses are fully explored. Tottenham and Walthamstow contain clusters of</p>

¹ See also paragraphs 6.4.5 to 6.4.8 for definition of industrial floorspace capacity

		creative industries which should be protected and supported. The Planning Framework should also protect and improve sustainable access to the Lee Valley Regional Park and reservoirs, and ensure links through to Hackney Wick and the Lower Lea Valley. Planning frameworks should include an assessment of any effects on the Epping Forest Special Area of Conservation and appropriate mitigation strategies.
DR4	Paragraph 2.1.53	Housing Zone status and investment by Peabody in estate renewal in the area will improve the quality of the environment and bring new housing opportunities. To deliver wider regeneration benefits to Thamesmead, other interventions to support the growth of the Opportunity Area are needed. These include: the redevelopment and intensification of employment sites to enable a range of new activities and workspaces to be created in parallel with new housing development; a review of open space provision in the area to create better quality, publicly accessible open spaces; the creation of a new local centre around Abbey Wood station, the revitalisation of Thamesmead town centre and Plumstead High Street; and improved local transit connections. The Planning Framework should ensure that there is no net loss of industrial floorspace capacity.
DR4	Paragraph 2.1.56	Industrial and logistics uses will continue to play a significant role in the area. The Planning Framework should ensure that there is no net loss of industrial floorspace capacity, and that industrial uses are retained and intensified, and form part of the mix in redevelopment proposals. Belvedere is recognised as having potential as a future District centre.
DR5	Policy G2	<p>A The Green Belt should be protected from inappropriate development:</p> <p>1) development proposals that would harm the Green Belt should be refused <u>except where very special circumstances exist</u></p> <p>2) <u>subject to national planning policy tests,</u> the enhancement of the Green Belt to provide appropriate multi-functional beneficial uses for Londoners should be supported.</p> <p>B <u>Exceptional circumstances are required to justify either the extension or de-designation of the Green Belt through the preparation or review of a Local Plan. The extension of the Green Belt will be supported, where appropriate. Its de-designation will not be supported.</u></p>

DR6	Policy G3(A)	<p>Metropolitan Open Land (MOL) is afforded the same status and level of protection as Green Belt:</p> <p>1) Development proposals that would harm MOL should be refused. MOL should be protected from inappropriate development in accordance with national planning policy tests that apply to the Green Belt</p> <p>2) boroughs should work with partners to enhance the quality and range of uses of MOL.</p>
DR6	Policy G3(C)	<p>Any alterations to the boundary of MOL should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs. MOL boundaries should only be changed in exceptional circumstances when this is fully evidenced and justified, <u>taking into account the purposes for including land in MOL set out in Part B ensuring that the quantum of MOL is not reduced, and that the overall value of the land designated as MOL is improved by reference to each of the criteria in Part B.</u></p>
DR7	Policy H14 and supporting text	<p>Delete Policy H14 B in its entirety.</p> <p>Modify Policies C and D as follows:</p> <p>C. Boroughs that have not undertaken a needs assessment since 2008 should use the figure of need for Gypsy and Traveller gypsy and traveller accommodation provided in Table 4.4 as identified need for pitches until a needs assessment, using the definition set out above, is undertaken as part of their Development Plan review process.</p> <p>D. Boroughs that have undertaken a needs assessment since 2008 should update this based on the definition set out above as part of their Development Plan review process</p> <p>Delete supporting text paragraphs 4.14.1, 4.14.2, 4.14.3, 4.14.4, 4.14.7 and re-number remaining paragraphs</p> <p>In Policy H14 sections A, E and G and supporting text paragraphs 4.14.5, 4.14.6, 4.14.8, 4.14.9, 4.14.11 and 4.14.12: Replace the terms 'Gypsy and Traveller' and 'Gypsies and Travellers' respectively with the phrases gypsy and traveller and gypsies and travellers in line with PPTS.</p>
DR8	Paragraph 0.0.21	<p>The Plan provides an appropriate spatial strategy that plans for London's growth in a sustainable way and has been found sound by the planning inspectors through the examination in public. The housing targets set out for each London Borough are the basis for planning for housing in London. Therefore, boroughs do not need to revisit these figures as part of their Local Plan development, <u>unless they have additional evidence that</u></p>

		<u>suggests they can achieve delivery of housing above these figures whilst remaining in line with the strategic policies established in this Plan.</u>		
DR9	Table 10.3	Location	<u>Number of beds</u>	Maximum parking provision*
		Central Activities Zone Inner London Opportunity Areas Metropolitan and Major Town Centres All areas of PTAL 5 – 6 Inner London PTAL 4	<u>All</u>	Car free
		Inner London PTAL 3	<u>All</u>	Up to 0.25 spaces per dwelling
		Inner London PTAL 2 Outer London PTAL 4 Outer London Opportunity Areas	<u>All</u>	Up to 0.5 spaces per dwelling
		Inner London PTAL 0 – 1 Outer London PTAL 3	<u>All</u>	Up to 0.75 spaces per dwelling
		Outer London PTAL 4	<u>1 – 2</u>	<u>Up to 0.5 - 0.75 spaces per dwelling*</u>
		Outer London PTAL 4	<u>3+</u>	<u>Up to 0.5 - 0.75 spaces per dwelling*</u>
		Outer London PTAL 2 – 3	<u>1 – 2</u>	<u>Up to 0.75 spaces per dwelling</u>
		Outer London PTAL 2 – 3	<u>3+</u>	Up to 1 space per dwelling
		Outer London PTAL 0 – 1	<u>1 – 2</u>	<u>Up to 1.5 space per dwelling</u>
		Outer London PTAL 0 – 1	<u>3+</u>	Up to 1.5 spaces per dwelling ^
		* Where Development Plans specify lower local maximum standards for general or operational parking, these should be followed		
		~ With the exception of disabled persons parking, see Part G Policy T6.1 Residential Parking		

		<p><u>* When considering development proposals that are higher density or in more accessible locations, the lower standard shown here should be applied as a maximum.</u></p> <p><u>^ Boroughs should consider standards that allow for higher levels of provision where there is clear evidence that this would support additional family housing Where small units (generally studios and one bedroom flats) make up a proportion of a development, parking provision should reflect the resultant reduction in demand so that provision across the site is less than 1.5 spaces per unit</u></p>
DR10	Policy T6.3(A) Retail Parking Standards	The maximum parking standards set out in Table 10.5 should be applied to new retail development, <u>unless alternative standards have been implemented in a Development Plan through the application of Policy G below.</u> New retail development should avoid being car-dependent and should follow a town centre first approach, as set out in <u>Policy SD7 Town centres: development principles and Development Plan Documents.</u>
DR10	Policy T6.3(G) NEW	<u>G. Boroughs may consider alternative standards in defined locations consistent with the relevant criteria in the NPPF where there is clear evidence that the standards in Table 10.5 would result in: a. A diversion of demand from town centres to out of town centres, undermining the town centres first approach. b. A significant reduction in the viability of mixed-use redevelopment proposals in town centre.</u>
DR11	Paragraphs 4.1.11 to 4.1.13	Delete paragraph 4.1.11 and re-number remaining paragraphs.

Further Directions			
Direction Overview	Intention to Publish London Plan Policy	Modification to Remedy National Policy Inconsistency New text is shown as bold red and deleted text as red strikethrough	Statement of Reasons
<p>DR12 Tall Buildings</p> <p>The draft London Plan includes a policy for tall buildings but this could allow isolated tall buildings outside designated areas for tall buildings and could enable boroughs to define tall buildings as lower than 7 storeys, thus thwarting proposals for gentle density.</p> <p>This Direction is designed to ensure that there is clear policy against tall buildings outside any areas that boroughs determine are appropriate for tall buildings, whilst ensuring that the concept of gentle density is embedded London wide.</p> <p>It retains the key role for boroughs to determine where may be appropriate for tall buildings and what the definition of tall</p>	<p>Policy D9 part B</p> <p>And supporting paragraph 3.9.3</p>	<p>Policy D9 Tall buildings</p> <p>Definition</p> <p>A Based on local context, Development Plans should define what is considered a tall building for specific localities, the height of which will vary between and within different parts of London but should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey.</p> <p>Locations</p> <p>B 1) Boroughs should determine if there are locations where tall buildings may be an appropriate form of development, subject to meeting the other requirements of the Plan. This process should include engagement with neighbouring boroughs that may be affected by tall building developments in identified locations.</p> <p>2) Any such locations and appropriate tall building heights should be identified on maps in Development Plans.</p> <p>3) Tall buildings should only be developed in locations that are identified as suitable in Development Plans.</p> <p>3.9.3 Tall buildings are generally those that are substantially taller than their surroundings and cause a significant change to the skyline. Boroughs should define what is a 'tall building' for specific localities, however this definition should not be should not be less than 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. This does not mean that all buildings up to this height are automatically acceptable, such proposals will still need to</p>	<p>Tall buildings can have significant impacts on their local surroundings. However, the approach of gentle densification is encouraged and in line with national policy in NPPF 2012 for a presumption in favour of sustainable development and to promote the use of brownfield land and focus development on existing settlements.</p> <p>So a balanced amendment is required to ensure that there is not an unintended policy against relatively modest height increases which could be caught by some definitions of tall buildings, for example the redevelopment of a 2 storey building to provide a 4-6 storey building.</p> <p>The 2012 NPPF Chapter 7 provides national policy on Good Design and para 58 refers to the importance of local character. The modification to policy D9 provides clear justification to avoid forms of development which are often considered to be out of character, whilst encouraging gentle density across London.</p>

<p>buildings are, so that it is suitable for that Borough.</p>		<p>be assessed in the context of other planning policies, by the boroughs in the usual way, to ensure that they are appropriate for their location and do not lead to unacceptable impacts on the local area. In large areas of extensive change, such as Opportunity Areas, the threshold for what constitutes a tall building should relate to the evolving (not just the existing) context. This policy applies to tall buildings as defined by the borough. Where there is no local definition, the policy applies to buildings over 6 storeys or 18 metres measured from ground to the floor level of the uppermost storey. 25m in height in the Thames Policy Area, and over 30m in height elsewhere in London.</p>	
<p>DR4 amended Policy E4 Land for industry</p> <p>This Direction is to provide boroughs that are facing the choice of considering the use of green belt sites in order to accommodate housing need, an option of considering further industrial land release.</p>	<p>Updated para 6.4.8</p>	<p>6.4.8 Where industrial land vacancy rates are currently well above the London average, Boroughs are encouraged to assess whether the release of industrial land for alternative uses is more appropriate if demand cannot support industrial uses in these locations. In exceptional circumstances when allocating land, boroughs considering the release of Green Belt or Metropolitan Open Land to accommodate housing need, may consider the re-allocation of industrial land, even where such land is in active employment uses. Where possible, a substitution approach to alternative locations with higher demand for industrial uses is encouraged.</p>	<p>As part of an overall approach to achieving sustainable development and prioritising the use of brownfield land, as set out in NPPF 2012, Boroughs facing decisions about releasing Green Belt or MOL to accommodate housing need, should have the option of allocating industrial land to meet these needs.</p>

Appendix 6



GL Hearn

Part of Capita Real Estate

Strategic Housing Market Assessment

**London Borough of Richmond upon
Thames**

Final Report

December 2016

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Quality Standards Control

The signatories below verify that this document has been prepared in accordance with our quality control requirements. These procedures do not affect the content and views expressed by the originator.

This document must only be treated as a draft unless it has been signed by the Originators and approved by a Business or Associate Director.

DATE
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Limitations

This document has been prepared for the stated objective and should not be used for any other purpose without the prior written authority of GL Hearn; we accept no responsibility or liability for the consequences of this document being used for a purpose other than for which it was commissioned.

EXECUTIVE SUMMARY

1. This summary brings together the key findings of the SHMA Report. It is structured to set out the policy context and then GL Hearn's conclusions in turn: regarding the geography of the housing market area; the overall objectively assessed need for housing; and then findings relating to the need for different types of homes and the housing needs of specific segments of the population.

Relevant Planning Policies

2. The 2015 London Plan (as updated) sets a minimum 10-year target for 3,150 homes between 2015-25 (315 per annum) for Richmond Borough.
3. The 2009 Core Strategy for LB Richmond sets a minimum housing target for 2,700 dwellings in the Borough between 2007-17 (270 per annum). Policy CP14 requires the maximum intensity of use of a site to be made compatible with the local context whilst respecting the quality, character and amenity of existing neighbourhoods. Development is expected to take place on brownfield land, with no greenfield development expected.
4. CP15 provides policies regarding affordable housing provision; 50% on-site affordable housing provision is expected on sites of over 10 dwellings (with a financial contribution expected from smaller sites). 40% is expected to be delivered for social rent, and 10% intermediate housing. The policy in particular promotes delivery of larger social rented units.
5. Further to that, most recent Housing and Planning Act introduced Starter Homes - a governmental initiative to help young (below 40), first-time buyers to purchase a home. This shall have implications on the delivery of more traditional forms of affordable housing, such as social/affordable rent.

Housing Market Area

6. The Borough's housing market is closely integrated with those in other West and South West London Boroughs, and also forms part of a wider London housing market that extends across the Capital and has strong links and inter-relationships into the Home Counties.
7. LB Richmond's strongest links are with Hounslow, Wandsworth and Kingston Boroughs. The evidence points to a net inflow of those in their late 20s and their 30s into the Borough, these groups are particularly seeking family-sized accommodation.

8. Demographic trends have seen an increase in all age groups over 40, together with children, in the recent past. There is a modest net out-migration of those in all age groups over 40 – this is to a range of areas outside London, including to Surrey.
9. Due to the complex interactions between Boroughs and across the Capital, London is defined by GLA as a housing market area in its own right. This report deals solely with the need in the London Borough of Richmond.

Overall Housing Need

10. The latest official demographic projections are the starting point for this and other assessments of housing need. The analysis in this report has reviewed a range of demographic projections. It concludes that the GLA Long-Term Migration Projections provide a reasonable assessment of demographic trends, if land supply constraints are 'left aside.' For Richmond, projections expect 17.2% population growth between 2014-33 in the Borough, and result in a housing need for 1,047 dwellings per annum.

Projected population growth – range of demographic based scenarios – Richmond

	Population 2014	Population 2033	Change in population	% change
GLA Long-Term Trends	193,585	226,950	33,365	17.2%
GLA Short-Term Trends	193,585	229,941	36,356	18.8%
GLA SHLAA Capped	193,792	207,856	14,063	7.3%
GLA SHLAA CLG	193,792	192,608	-1,185	-0.6%
ONS 2014-based SNPP	193,585	237,499	43,914	22.7%
ONS 2014-based (+MYE)	193,585	234,417	40,832	21.1%

Source: Demographic Projections (derived from GLA and ONS data)

11. The analysis concludes that these are the most appropriate unconstrained projections although consideration should also be given to the GLA SHLAA (CLG) Projection which reflects a supply constrained position.
12. GL Hearn has also considered 2014-based household projections. These potentially indicated some suppression of household formation moving forward (particularly amongst people aged 25-34); however, changes to household formation are likely to some degree to be driven by changing household structures (linked to international migration and growth in BME communities). Additionally, given a supply constrained housing market, improvements to household formation are arguably unlikely. Therefore, on balance the 2014-based CLG projections are considered to be a reasonable assessment of how household formation might change moving forward.

Projected housing need – range of demographic based scenarios and 2014-based headship rates – Richmond

	Households 2014	Households 2033	Change in households	Per annum	Dwellings (per annum)
GLA Long-Term Trends	82,669	101,851	19,182	1,010	1,047
GLA Short-Term Trends	82,669	103,756	21,088	1,110	1,151
GLA SHLAA Capped	83,048	94,682	11,634	612	635
GLA SHLAA CLG	83,051	88,201	5,150	271	281
ONS 2014-based SNPP	82,640	105,330	22,690	1,194	1,239
ONS 2014-based (+MYE)	82,640	104,427	21,787	1,147	1,190

Source: Demographic Projections (derived from GLA, CLG and ONS data)

13. Once applying the formation rates from the 2014-based household projections to the long-term population estimates (and including a vacancy allowance) it is concluded that the (unconstrained) demographic-based need for housing in the Borough is for around 1,047 dwellings per annum in the 2014-33 period – linked to the GLA 12-year migration projection. This is at the bottom end of the range identified by the demographic projections but is consistent with past trends in population growth. Evidently taking account of land supply, expected growth will be lower, which could result in a stronger relative ageing of the population in the Borough.
14. In drawing conclusions on the potential OAN, these figures should be regarded as a minimum level of provision. Economic factors do not provide an upside to this assessment of need: they show a need for 963 homes per annum based on forecasts which potentially overstate the likely performance of the Borough's economy given in particular a diminishing stock of office floorspace available to accommodate jobs growth.
15. In respect of affordability issues, in terms of both market signals and affordable housing need, whilst in an unconstrained situation these might be considered as justifying higher housing provision relative to the demographic need, this is unrealistic set against a constrained land supply. A notional 'unmet housing need' should be measured against the demographic-based need set out (1,047 dwellings per annum).

Affordable Housing Need & Market Signals

16. Market signals section indicates that house prices increased by a third between 2010-15 and are higher than in many Outer London Boroughs. Rental costs have increased 39% between 2011-15, alongside a substantial increase of PRS between 2001 and 2011 but particularly in the post

recessionary period. In both cases this represents a significant growth in housing costs in real terms. The evidence suggests entry level house prices in the Borough in 2014 were 14.5 times the incomes of younger households – significantly above the Outer London average of 9.8.

17. Affordable housing need has been assessed using the Basic Needs Assessment Model, as set out in Planning Practice Guidance. Set against a limited supply of affordable housing and high costs for market housing for sale and rent, a high need for affordable housing is shown – 964 households per annum. This level of need is assessed on an unconstrained basis.
18. The high level of affordable housing need clearly justifies policies seeking to maximise the delivery of affordable housing in the Borough, so far as this does not render development unviable. The Council's current policies seek 50% on-site affordable housing on development schemes of over 10 dwellings, and contributions to affordable housing on smaller sites. The needs evidence will need to be brought together with a Plan-wide Viability Assessment in drawing conclusions on future policies for affordable housing provision, but would justify a continuation of the current policy approach.

Need for Different Types of Homes

19. In the context of Richmond, GL Hearn concluded that the availability of the land is likely to influence future development trends and therefore shall be considered when setting policy targets. Taking this into account, the London Plan sets a minimum housing target for 315 homes per annum. This is a minimum and development sites are expected to optimise housing output taking account of location and context, public transport accessibility and design standards.
20. A constrained land supply is likely to influence the migration and household formation trends moving forwards. The GLA SHLAA-constrained demographic modelling expects lower population growth and a stronger relative ageing of the population, and in-migration of younger persons is more restricted. The population in most age groups under 45 is expected to fall. In absolute numbers, it expects population growth of 4,200 to 2033; however in line with past trends population growth could feasibly be stronger – but this would likely be supported by greater intensity of use of housing including by younger households.
21. In the affordable sector, there is a greater relationship between the sizes of households and the sizes of homes they occupy, and thus a greater need is shown for smaller properties than in the market sector. A number of policy considerations such as making best use of Registered Provider stock and overcrowding may however lessen this requirement. Market demand in the borough is particularly for family housing; although it will be important to also provide attractive housing for older households looking to downsize.

22. The modelling indicates that the current policy seeking 80% social/ affordable rented housing and 20% intermediate housing remains appropriate.
23. The SHMA has though also assessed the need for Starter Homes. A potential need for between 105 – 126 Starter Homes per year is shown. This represents 10-12% of the (unconstrained) demographic need and about 11%-13% of the affordable housing need. If Starter Homes are included within the definition of affordable housing, an 80/ 20 split between social/ affordable rent and intermediate/ starter homes would still remain relevant.
24. A growing older population is expected to exert a key influence on future demand. Approximately 34% growth in the population over 65 is expected in the SHLAA-constrained demographic scenario. Linked to a growing older population, the population with dementia is expected to increase by 58%-68% and those with mobility problems by 46%-58%. It will be important to provide a range of housing options and support – including specialist housing, adaptations to properties and floating support.
25. In regard to specialist accommodation for older persons, a need for between 61-75 units per annum is identified. This forms part of the C3 need for housing. This would include provision of extra-care and sheltered accommodation. However, decisions about types of specialist housing that are required will need to be taken at a local level taking account of specific needs and existing supply.
26. In addition, the modelling indicates a need for 26-29 residential care bedspaces. The provision of additional extra care housing could reduce this requirement. This would fall within a C2 use, and is separate from the overall need for housing assessed herein.
27. With a growing older population, the numbers of people with disabilities is expected to increase. The London Plan requirement for 10% wheelchair accessible dwellings (to the optional higher Building Regulation M4(3) is entirely supported by the SHMA evidence.
28. More widely, the Borough is an attractive location for families. The evidence however indicates that 8% of households (6,100 households) contain non-dependent children. Provision of affordable options will be important in enabling young people to move out of the family home.
29. There is a growing BME population in the Borough, particularly of White Other and Asian/ Asian British origin. This is relatively younger than the wider population, with a higher proportion living in the Private Rented Sector.
30. The Private Rented Sector has been growing, but is not as large as in other parts of London. The Borough has a small student population. The evidence does not suggest that this has a particular

impact on the local housing market, but this should continue to be monitored. It should also be noted that there is a strategic need for additional student accommodation which has been identified across London.

31. The Council might wish to consider policies regarding development of private rented accommodation. This is a growing sector across London, and the SHMA points to the likelihood of its continuing growth and importance in accommodating younger people in the Borough. In doing so, it should recognise that scheme viability is different from mixed tenure housing developments. A bespoke policy regarding affordable housing might be considered.
32. Self- and custom build housing is a further potential growth sector. A modest level of existing demand is shown through existing evidence. Evidently land supply is a potential constraint on growth. The Council has recently set up a register of those interested in self- and custom-build development.

1 INTRODUCTION

Context to the SHMA

- 1.1 The London Borough of Richmond upon Thames (LB Richmond) is embarking on a review of its planning policies to address local needs, particularly strengthen the economic focus, and provide an up to date set of planning policies to guide development.
- 1.2 National planning policies set out that local authorities should have a clear understanding of housing needs in the area; and should objectively assess the need for market and affordable housing.
- 1.3 The Council has commissioned GL Hearn to prepare this Strategic Housing Market Assessment (SHMA) dealing with housing need in the Borough, to inform and support housing policies within its Local Plan. The SHMA provides an evidence base regarding housing need, taking account of the planning and housing context within the Borough, together with changes at a national level to legislation and policies concerning housing.
- 1.4 The preparation of the SHMA has followed relevant national policy and guidance, specifically the National Planning Policy Framework¹ and Planning Practice Guidance (PPG) on Housing and Economic Development Needs Assessments². It takes account of the 2015 London Plan.
- 1.5 The SHMA does not set policies for housing provision. It is intended to provide an understanding of housing need and market dynamics to assist the Council in reviewing its policies through the preparation of the Local Plan. The Council's local evidence and strategies will also inform their approach.

Structure of this Report

- 1.6 This report provides an assessment of housing need, which is published alongside the public consultation on the Local Plan review pre-publication version. The housing need calculations in the report cover the period 2014 to 2033. As such much of the baseline work covers the same starting point.
- 1.7 The report has been informed through engagement with a number of stakeholders, including various internal departments within the Council, and with a range of estate and letting agents across the Borough in order to understand housing dynamics. The draft SHMA was published in

¹ CLG (March 2012) *National Planning Policy Framework*

² <http://planningguidance.planningportal.gov.uk/blog/guidance/housing-and-economic-development-needs-assessments/>

summer 2016, when there was targeted engagement, including with neighbouring authorities and registered providers alongside the Council's consultation on the Local Plan Pre-Publication. The report has now been finalised; most of the report continues to use 2014 data for the analysis, where appropriate commentary on the 2015 position has been provided.

- 1.8 Following this introduction, Section 2 includes a review of existing policies for housing in the Borough, as well as across London; and national policies which will affect housing delivery in LB Richmond. It considers the interactions between the Borough and surrounding areas, recognising that there are relationships with surrounding areas but that GLA has defined London as single "housing market area" in its own right.
- 1.9 The report then, taking account of the Planning Advisory Service's Technical Advice Note on Objectively Assessed Housing Need and Housing Targets, provides a baseline analysis of the population and socio-economic characteristics of the Borough. This is set out in Section 4. Section 5 then considers demographic dynamics.
- 1.10 Sections 5 – 8 then provide an analysis of the influences on overall housing need within the Borough, and an understanding of housing market dynamics.
- 1.11 Section 5 and 6 considers trend-based population projections and economic forecasts, albeit that it should be recognised in a local context that land supply may be a key influence on future housing delivery (and the subsequent setting of policy targets), and thus population/ demographic change.
- 1.12 The need for affordable housing is considered in Section 7, using an approach which accords with the Planning Practice Guidance.
- 1.13 Section 8 then reviews "market signals" as defined in Planning Practice Guidance; and presents the findings from engagement with estate and letting agents within the Borough. This aims to provide an up-to-date understanding of housing market dynamics.
- 1.14 Section 9 moves on to consider the needs for different types of homes – including different sizes and types of homes, both market and affordable; and for different types of affordable homes. It includes an analysis of the need for Starter Homes.
- 1.15 The penultimate section, Section 10, then reviews the housing needs of different groups within the local community - including older people; those in Black and Minority Ethnic Groups; those with disabilities; families and young people.
- 1.16 Section 11 draws the preceding analysis together to set out conclusions.

2 POLICY CONTEXT

2.1 In this section we review policies for housing provision, at a national, London and local level.

National Policies

2.2 National policies for plan-making are set out within the National Planning Policy Framework.³ This sets out key policies against which development plans will be assessed at examination. It is also a material consideration in planning decisions.

National Planning Policy Framework (NPPF)

2.3 The National Planning Policy Framework (NPPF) was published by Government in March 2012. The Framework sets a presumption in favour of sustainable development (Paragraph 14) whereby local plans should meet objectively assessed development needs, with sufficient flexibility to respond to rapid change, unless the adverse impacts of doing so would significantly or demonstrably outweigh the benefits or policies within the Framework indicate that development should be restricted.

2.4 In Paragraph 47, the Framework outlines that:

“To boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework.”

2.5 The London Plan established that London is the relevant Housing Market Area, with the Inspector at the FALP Examination setting out that evidence at a local level should focus on considering the appropriate mix of housing to provide. However case law sets out that a local planning authority should understand its own housing need; and should prepare an SHMA collaboratively with other areas as appropriate to do so.⁴

2.6 The NPPF highlights the Strategic Housing Market Assessment (SHMA) as a key piece of evidence in determining housing needs. Paragraph 159 in the Framework outlines that this should identify the scale and mix of housing and the range of tenures which the local population is likely to need over the plan period which:

- Meets household and population projections, taking account of migration and demographic change;

³ CLG (March 2012) *National Planning Policy Framework*

⁴ *Satnam Millennium vs. Warrington MBC*, Para 25

- Addresses the need for all types of housing, including affordable housing and the needs of different groups in the community; and
- Caters for housing demand and the scale of housing supply necessary to meet this demand.

2.7 Paragraph 181 sets out that Local Planning Authorities (LPAs) will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their local plans are submitted for examining. This is underpinned by the legal ‘duty to cooperate.’

2.8 In regard to housing mix, the NPPF sets out in Paragraph 50 that authorities should plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community. Planning authorities should identify the size, type, tenure and range of housing that is required in particular locations reflecting local demand. Where a need for affordable housing is identified, authorities should set policies for meeting this need on site. National thresholds for affordable housing provision are removed as are national brownfield development targets.

2.9 In setting affordable housing targets, the NPPF states that to ensure a plan is deliverable, the sites and the scale of development identified in the plan should not be subject to a scale of obligations and policy burdens such that their ability to be developed is threatened and should support development throughout the economic cycle. The costs of requirements likely to be applied to development, including affordable housing requirements, contributions to infrastructure and other policies in the Plan, should not compromise the viability of development schemes. To address this, affordable housing policies would need to be considered alongside other factors including infrastructure contributions – a ‘whole plan’ approach to viability.

Planning Practice Guidance

2.10 The Planning Practice Guidance (PPG) was issued by Government in March 2014 on ‘*Assessment of Housing and Economic Development Needs*’ and is maintained as an online resource, which is updated periodically. The PPG is relevant to this report in that it provides clarity on how key elements of the NPPF should be interpreted, including the approach to deriving the Objectively Assessed Need (OAN) for housing. The approach in this report reflects and is consistent with this Guidance.

2.11 The Guidance defines “need” as referring to:

“the scale and mix of housing and the range of tenures that is likely to be needed in the housing market area over the plan period – and should cater for the housing demand of the area and identify the scale of housing supply necessary to meet this need.”

2.12 It sets out that the assessment of need should be realistic in taking account of the particular nature of that area, and should be based on future scenarios that could be reasonably expected to occur. It should not take account of supply-side factors or development constraints. Specifically the Guidance sets out that:

“plan makers should not apply constraints to the overall assessment of need, such as limitations imposed by the supply of land for new development, historical under performance, infrastructure or environmental constraints. However these considerations will need to be addressed when bringing evidence bases together to identify specific policies within development plans.”

2.13 This report does thus not deal with development constraints including environmental constraints and infrastructure. These will be taken into account by the Council in considering how development needs can and should be accommodated in setting policy targets.

2.14 The Guidance outlines that estimating future need is not an exact science and that there is no one methodological approach or dataset which will provide a definitive assessment of need. However, ‘the starting point’ for establishing the need for housing should be the latest household projections published by the Department for Communities and Local Government (CLG).

2.15 The Guidance indicates that job growth trends and/or economic forecasts should be considered having regard to the growth in working-age population in the housing market area.

2.16 The PPG also sets out how affordable housing need should be assessed, in essence retaining the approach to doing so which had been used in previous Government Guidance (often termed the ‘Basic Needs Assessment Model.’).

2.17 In regard to the mix of housing needed, the PPG outlines that once an overall housing figure has been identified, plan makers will need to break this down by tenure, household type (singles, couples and families) and household size. Plan makers should therefore examine current and future trends of:

- the proportion of the population of different age profile;
- the types of household (e.g. singles, couples, families by age group, numbers of children and dependents);
- the current housing stock size of dwellings (e.g. one, two+ bedrooms);
- the tenure composition of housing.

2.18 This information should be drawn together to understand how age profile and household mix relate to each other, and how this may change in the future. Plan makers should look at the household types, tenure and size in the current stock and in recent supply, and (the PPG sets out) assess

whether continuation of these trends would meet future needs. The needs of specific groups within the population are expected to be considered including (where relevant):

- The private rented sector;
- People wishing to build their own homes;
- Family housing;
- Housing for older people;
- Housing for people with specific needs.

Consultation on Proposed Changes to National Planning Policy

- 2.19 The Government issued a consultation in December 2015 on proposed changes to national planning policies. These deal with the definition of affordable housing; supporting delivery of new settlements, development of brownfield land and small sites, and land allocated in plans; as well as Starter Homes.
- 2.20 The consultation proposes the revision of the definition of affordable housing to place a greater emphasis on supporting households to access home ownership, where that is their aspiration; and including a fuller range of products as affordable housing – including low cost market housing or intermediate rent products. Starter Homes would be included, in effect removing the requirement for low cost market housing to be ‘in perpetuity.’ Starter Homes are intended to be sold at a discount of at least 20% to first-time buyers aged under 40.
- 2.21 On brownfield sites identified by Councils on registers of brownfield sites suitable for housing, it is proposed that a stronger “permission in principle” for development will exist, unless overriding conflicts exist with a local plan or with the NPPF that cannot be mitigated.
- 2.22 On under-used or unviable commercial and employment land, it is proposed to strengthen Paragraph 22 of the Framework to make clear that employment land should be released unless there is significant and compelling evidence to justify why it should be retained – this include as a minimum an up-to-date needs assessment and significant additional evidence of market demand. It is also proposed that a length of time (such as 3 years) should be introduced beyond which commercial or employment land should not be protected.
- 2.23 The exception site policy for Starter Home developments on under-used/ unviable commercial land (announced by Government in March 2015) is also proposed to be extended to include other brownfield land, such as for retail, leisure and non-residential institutional uses.
- 2.24 It is proposed that plans will also be expected to put in place specific positive local policies for assessing development on small ‘windfall’ sites. To drive forward delivery rates, a new test is

mooted which would require active steps to be taken where there is evidence of significant under-delivery – including through initiating a plan review or identifying additional allocations.

- 2.25 Wider reforms proposed include changes seeking to promote higher density development around existing/ planned transport hubs, and policies supporting the development of new settlements. In a Borough context, the definition of commuter hubs would potentially apply to a number of rail and tube stations within the Borough. It also proposes to support the development of Green Belt land where it is proposed through a neighbourhood plan; or of development of Starter Homes on brownfield land.

Local Plans Expert Group

- 2.26 In September 2015 ministers launched a panel of experts - the Local Plans Expert Group - to examine what measures or reforms might be helpful in ensuring the efficient and effective production of Local Plans. Ministers received the detailed report (March 2016) from the Local Plans Expert Group and it was open to the public for representations until 27 April 2016. The report made recommendations covering the approach and guidance for assessing housing needs, through the adoption of a simplified and standard methodology providing suggested changes to PPG.

Implications

- Government is proposing to widen the definition of affordable housing and provide a greater focus on supporting households into home ownership. With limited additional funding being made available, this may well negatively impact on delivery of social/ affordable rented housing for those on lower incomes – but could well help a segment of more affluent younger households move from renting into home ownership.
- The Council will need to set up a register of brownfield sites suitable for housing – where the principal of residential development is accepted. There are some risks that the ‘permission in principle’ could influence the rate of schemes permitted at appeal.
- The protection for employment sites –there is a need for up- to- date evidence, Article 4 Directions and robust employment policies to protect employment land.
- Other commercial sites – such as those in A and D class uses – are also potentially susceptible to residential pressures for delivery of Starter Homes. Although land supply is limited in the borough, in many parts it is likely that residential land values even with a 20% discount will be above those for other uses.

Housing and Planning Bill

- 2.27 The Housing and Planning Bill⁵ is, at the time of writing, working its way through Parliament.
- 2.28 The Bill will place a duty on English planning authorities to promote the supply of Starter Homes; having regard to any guidance given by the Secretary of State in doing so. It sets out that the Secretary of State may, through regulations, prescribe that residential development provides a specified level of Starter Homes. In London a Starter Home would be priced at a discount of at least 20% of the market value, and below a cap price of £450,000 in London; to a first-time buyer aged under 40. Where there is a conflict with policies in existing plans, the Secretary of State may make a compliance direction setting out that now regard should be had to a specified policy in determining planning applications.
- 2.29 Building on the Self-Build and Custom Housebuilding Act 2015, which requires authorities to maintain a register of those interested in self and custom housebuilding, the Bill proposes that demand for such development would reflect the number of entries added to the register over a specified period. The Bill proposes that Councils would be required to give consent for enough serviced plots of land to meet the demand identified. Authorities can however apply for exemption from this requirement, and this is something which the Council is considering in view of the nature of its area and land values.
- 2.30 The Bill includes a number of provisions seeking to deter rogue landlords and property agents, including through use of banning orders; rent repayment orders; and establishment of a database of rogue landlords and agents.
- 2.31 It also includes proposals for the voluntary extension of right-to-buy legislation to registered providers, allowing the Secretary of State and Greater London Authority to make grants to providers. The Bill will require two units of affordable housing to be delivered for each voluntary right to buy sale in London, although there are no tenure requirements for the replacement units. The Bill also seeks to in effect require stock holding local housing authorities to sell off “higher value housing” when it becomes vacant, with the receipts from this (or equivalent cost of high value properties which have become vacant, even if these are not sold) going to the Treasury. A definition of high value housing will no doubt be defined by Government through regulations.
- 2.32 In regard to rents within the affordable housing sector, the Bill sets mandatory rents for “high income social tenants” – which Government’s Consultation of October 2015 indicated would be those households earning over £40,000 gross per annum in London. The Bill sets out a taper for

⁵ The Bill received Royal Assent on 12 May 2016 to become the Housing and Planning Act 2016

those earning over this amount who will pay an additional 15p in every one pound earned. The increase in rent income achieved would be payable to Government (post deductions for administrative costs). Implementation will be voluntary for Registered Providers who will be able to invest additional funds raised for affordable housing.

- 2.33 The Bill also proposes a duty to consider the needs of people residing in caravans and houseboats.
- 2.34 In respect of planning, sections of the Bill deal with neighbourhood planning; powers for the Secretary of State to intervene in local plan examinations and in circumstances where local plans are not progressing sufficiently – including the potential for the Secretary of State to direct an authority to submit a plan for examination. It also includes provision for development orders which grant “permission in principle” for development.
- 2.35 A number of wider matters are dealt with in the Bill, including in regard to Compulsory Purchase of land.

Implications

- The Government will require a proportion of new development to be provided as Starter Homes, in order to deliver its target nationally for delivery of 200,000 starter homes by 2020. Whilst this may influence viability – and its impact should be considered through Whole Plan Viability Evidence – it is likely to impact on delivery of more traditional forms of affordable housing, such as social/ affordable rent.
- The sell-off of high value social housing is not expected to influence the Borough as the Council is not a stock-owning authority. The impact of the voluntary Right-to-Buy could impact on the supply of rented homes, depending on scheme exemptions and whether replacement affordable homes are built locally and are of the same tenure.

Wider Government Reforms

- 2.36 In addition to the above there are a number of wider current housing policy issues. Amongst these are the changes set out in the table overleaf:

Table 1: Key Government Housing Reforms

Policy	Details
<p>Extension of Right-to-Buy to Housing Association Tenants</p>	<p>As set out above, the Housing & Planning Bill includes proposals for the voluntary extension of Right-to-Buy by Housing Associations to their tenants.</p> <p>Although not enforceable this could reduce affordable housing stock and reduce thus the number of re-lets. Research by Joseph Rowntree Foundation⁶ predicts that nationally 8.3% of housing association tenants will be eligible for and could afford the RTB, and that 71% of those will purchase their home over the first five years.</p>
<p>Caps on Social Rents</p>	<p>Social rents to be reduced by 1% per annum from April 2016 for four years. This is expected to impact on business plans for developing Registered Providers.</p> <p>Rents are also to be capped at the Local Housing Allowance level. For some Registered Providers this will limit their income to a multiple of the Local Housing Allowance. In the long term likely to influence the type of homes they build with more smaller family homes being likely. The inclusion of the shared accommodation rate for those aged under 35 may also impact the development of one bed affordable rent units with tenants reliant on housing benefit having a shortfall of at least £30 per week.</p> <p>The reduction in social rents is also likely to influence the type of stock brought forward through development programmes of Registered Providers – which is likely to be more private sale and shared ownership. To subsidise rented units Registered Providers may also increase service charges or change the service offer to tenants including support.</p> <p>The LHA cap will also impact on supported housing – there is a one year exemption but it is expected that Registered Provider developers will put off schemes without surety on income.</p>
<p>Increasing Rents to Market Rates for Social Housing Tenants earning over £40,000</p>	<p>This “pay to stay” initiative will ensure those who can afford to pay market rates will do so.</p> <p>However, it may mean that people are more likely to exercise their right to buy thus reducing the stock level.</p>

⁶ Understanding the likely poverty impacts of the extension of Right to Buy on housing association tenants. JRF 21st November 2015.

<p>Stamp Duty on Second Homes</p>	<p>Government announced a 3 percentage point surcharge on Stamp Duty rates for Buy-to-Let and Second Home Purchases from April 2016. The evidence from estate and letting agents indicates that this had a short-term impact on increasing demand from investors seeking to buy homes before the changes came into play. In the longer-term the impact is less certain.</p>
<p>Tax Relief Changes for Landlords</p>	<p>Investors can currently claim tax relief on mortgage interest at the rate at which they pay tax (20%/ 40%/ 45%). Between 2017-20 the system will change – with landlords liable for tax on all of their rental income, and able to claim tax relief only at the basic rate (20%). This will reduce or eradicate rental returns for higher rate tax payers, and may push some into higher tax bands.</p> <p>While the introduction of the new rules may not result in a flood of sales, it may well reduce the supply of PRS properties.</p>

London Policies

A City for All Londoners

- 2.37 Published in October 2016 this publication was the first major strategy document under the new Mayor Sadiq Khan. This document, while not a policy document, “sets the tone” for detailed strategies which will subsequently be published for consultation. The document provides a “the direction of travel” for these policies.
- 2.38 The report does not set out any housing targets for the City however there is a clear desire to increase supply and to provide homes for sale and rent as well as more shared ownership properties.
- 2.39 In relation to affordable housing the Mayor upholds a commitment to achieve 50% affordable housing in new developments and highlights that last year only 13% of homes granted planning permission were affordable.
- 2.40 The Mayor also wants to shift the tenure focus from owner occupation to renting. Renting options will be promoted for middle earners through the London Living Rent. There will also be more of a focus on shared ownership properties. The Mayor has also committed to securing finance for build-to-rent to support smaller house builders and to introduce planning policies that promote smaller sites.

- 2.41 There is also a desire to promote larger scale housing provision in the most accessible locations and also to deliver homes on publicly owned land.

The London Plan 2015

- 2.42 The 2015 London Plan (as updated) sets a minimum 10 year target for 3,150 homes between 2015-25 (315 per annum) for Richmond Borough.
- 2.43 The Plan recognises Greater London as a single Housing Market Area (HMA); and this has been accepted through the examination of Further Alterations to the London Plan.
- 2.44 Across London, 42,000 homes per annum (net) are planned for (2015-25); which falls below the need projections in the London SHMA 2013 which indicated a need for between 49,000 (2015-36) and 62,000 (2015-26) homes a year across the Capital. This reflects demographic change, the time taken to reduce the current (backlog) housing need and the anticipated under-delivery between 2011-15. These conclusions are based on the GLA's 2013 Central Projection for growth in population; and household formation rates from the 2011-based CLG Household Projections. The Mayor has committed to reviewing targets by 2019/20. A review of the London Plan will be brought forward by the new Mayor, following elections in May 2016.
- 2.45 The London Plan provides quite detailed guidance regarding the types of homes expected to be built – setting out density and space standards, and policies regarding housing mix and affordable housing provision. Developments are expected to optimise housing output, taking account of location; local context and character; design principles; and public transport capacity. Table 3.2 provides a density matrix linked to the setting and Public Transport Accessibility Rating (PTAL) of the site. Minimum space standards for development are set out in Table 3.3.
- 2.46 Policy 3.11 deals with affordable housing. This sets out that the Mayor, boroughs and other relevant agencies/partners should maximise affordable housing provision, with:
- An average target of at least 17,000 homes (which is equivalent to 40% of the Plan's minimum targets);
 - A tenure mix whereby 60% is of social or affordable rented provision and 40% for intermediate rent or sale; and
 - A priority is given to provision of affordable family housing.
- 2.47 Boroughs are required in LDFs to set an overall target for affordable housing provision and separate targets in social/ affordable rent, and intermediate housing. Affordable housing targets can be expressed in absolute or percentage terms in light of local circumstances, but must take account of economic viability and other relevant considerations (listed in Policy 3.12). In general a threshold

of 10 or more homes is considered 'normal' although Boroughs can seek a lower thresholds where this can be justified (Policy 3.13). The SHMA is required to provide an evidence base regarding the need for different types/ sizes of affordable housing.

- 2.48 The London Plan sets out in Policy 3.8 that new developments should 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. It particularly promotes delivery of social/ affordable rented family housing, institutional investment in the Private Rented Sector (PRS) and enhanced provision of intermediate affordable housing. The SHMA is necessary to provide local evidence of need to support the implementation of this.
- 2.49 The policy also sets out that all new housing should be built to Lifetime Homes standards and 10% is designed to be wheelchair accessible or easily adaptable for wheelchair users. This responds to expected growth in the older population; as well as a current unmet need for from 30,000 households for wheelchair accessible housing and more than 100,000 for redesigned bathing facilities. It also requires account to be taken of a growing older population, the needs of particular communities, and student housing needs; together with appropriate provision to be made for accommodation for service families and custom build having regard to local need. The SHMA will provide the needs evidence in this respect. Lifetime Homes standards have really been replaced by National Standards within Building Regulations and references in Policy 3.8 have been updated in the Minor Alterations to the London Plan (2016). Updates to Policy 3.5 also reflect the nationally described space standard.
- 2.50 The Plan sets out that *"the planning system must take a more positive approach in enabling [the private rented] sector to contribute to achievement of housing targets."* Whilst outlining that the Mayor will continue to work to encourage institutional investment in the sector, it notes that viability tests for covenanted PRS should take account of the distinct economics of this form of development. This is an important sector for London – and one which the SHMA will need to address.

The London Housing Strategy 2014

- 2.51 Homes for London, the London Housing Strategy (June 2014), sets out the Mayor's strategy for addressing the housing issues in London. The overriding aims of the strategy are to increase the supply of housing of all tenures and to ensure that these homes better support London's continued economic success. The key priorities were set out as following:
- Increasing housing supply to levels not seen since the 1930s;
 - Better supporting working Londoners and helping more of them into home ownership;
 - Improving the private rented sector and promoting new purpose - built and well managed private rented housing;

- Pushing for a new, long-term financial settlement for London Government to drive housing delivery; and
 - Bringing forward land for development and accelerating the pace of housing delivery through Housing Zones and the London Housing Bank.
- 2.52 The strategy sets out an annual delivery target of a minimum of 42,000 new homes, of which at least 17,000 (40%) should be affordable. Over the next 20 years this amounts to 840,000 new homes in total.
- 2.53 The strategy will increase the provision of smaller affordable homes targeted at those downsizing, support purpose-built older people's housing and offer better incentives for older people to downsize. This is in order to tackle overcrowding, particularly in the social rented stock.
- 2.54 The strategy also recognises that London's housing market is complex and diverse and there is not a homogenous housing market within any single borough boundary. It contains a range of sub-markets which vary widely, not just by tenure and price, but by the type of purchaser and renter.
- 2.55 Debate around affordability gained momentum as a result of mayoral race during the first months of 2016. On 5th May 2016, Sadiq Khan became the new Mayor of London. His policies aims to set a target of half of all the new homes that are built across London being genuinely affordable to rent or buy. His Homes for Londoners concept will include homes for social rent, homes for London Living Rent (with rents based on one-third of average local wages), homes for first-time buyers to 'part-buy part-rent'.
- 2.56 The new mayor aims to achieve this by building new homes on land owned by the Mayor, including Transport for London land, and bidding to develop other public sector land; supporting housing associations and by long-term planning for new and affordable homes tied in with new transport infrastructure, including proposals such as DLR extensions, the Bakerloo Line extension, and Crossrail 2.

Implications

- Density and space standards set out in the London Plan, and national space standards, will be relevant considerations for new housing development in the Borough.
- The London Plan and Mayor's Housing Strategy particularly promote delivery of affordable family housing; and institutional investment in the Private Rented Sector.

Local Policies

- 2.57 The 2009 Core Strategy sets a minimum housing target for 2,700 dwellings in the Borough between 2007-17 (270 per annum). Policy CP14 requires the maximum intensity of use of a site to be made compatible with the local context whilst respecting the quality, character and amenity of existing neighbourhoods. Development is expected to take place on brownfield land, with no greenfield development expected.
- 2.58 All housing is expected to be built to Lifetime Homes standards; with 10% provided as wheelchair-accessible. At least 25% small 1-bed units are expected, rising to 75% in the more sustainable locations.
- 2.59 Policy CP14 seeks to resist the loss of housing to other uses. It expects new housing to contribute to mixed and balanced communities.
- 2.60 CP15 provides policies regarding affordable housing provision. 50% on-site affordable housing provision is expected on sites of over 10 dwellings (with a financial contribution expected from smaller sites). 40% is expected to be delivered for social rent, and 10% intermediate housing. The policy in particular promotes delivery of larger social rented units.
- 2.61 The 2011 Development Management Plan builds on the Core Strategy and includes more detailed policies for managing development. Policy DMHO1 expects redevelopment of existing housing to be justified. Policy DMHO4 encourages family housing. Policy DMHO5 expects new housing to meet identified specific community needs to be based on robust evidence of local needs. Policy DMHO6 seeks financial contributions to affordable housing from all small sites, recognising regard will be had to viability in delivering affordable housing.
- 2.62 This SHMA will inform how policies for housing are crafted within the Local Plan Review. Once adopted this will replace policies in the 2009 Core Strategy and the 2011 Development Management Plan.
- 2.63 The borough position on housing needs and affordability is set out in the Housing Strategy 2013-17 and accompanying guidance and evidence base. It is based around five key themes that address the key housing issues in the borough. These are:
- Good quality homes;
 - Supporting residents: delivering affordable homes;
 - Supporting residents: addressing housing market pressures and homelessness;
 - Supporting residents: choice, standards and quality for renters; and
 - The connectivity of housing to people and place: housing contributions to health, wellbeing and the economy.

3 SPATIAL DYNAMICS

3.1 In this section we move on to consider spatial dynamics. London is defined as a housing market area in its own right by the GLA, with the 2013 London SHMA seeking to move away from defining sub-markets within London recognising that there are complex sets of interactions between Boroughs and across the Capital. In this context, this section seeks to understand spatial relationships between LB Richmond and surrounding areas, together with the profile of and influences on people moving to/ from the Borough.

Internal Migration Flows

3.2 ONS recorded 2.85 million 'internal' moves between local authorities over the July 2013 – June 2014 period, up 5% on the previous year. This reflects a recovery of the levels of moves following the 2009-11 recessionary period; and returns levels of moves to those seen at the peak of the last market cycle.

3.3 At a national level movement is greatest of those in their late teens and early 20s, reflecting flows of students moving to/ from universities. More broadly, those in their 20s and 30s see the highest levels of movement; together with young children. Once families have children in schools, levels (and distance) of moves are less. The level of migration movement in London is far higher than for other UK regions.

3.4 Looking at in-migration to the Borough, the evidence points to the majority of movers coming from another London Borough (62-63%); or from Surrey (6-7%). Around 22-23% of longer distance moves are from beyond London and the South East Regions.

Table 2: Internal In-Migration to LB Richmond

	2011-12	2012-13	2013-14
London	8080	8310	8500
Surrey	870	800	1000
Other South East	1550	1520	1480
East of England	620	580	610
Other English Regions	1960	1940	2070
Other Parts of UK	430	390	360

Source: ONS Internal Migration Matrices

3.5 The largest sources of internal in-migrants are from other boroughs in West or South West London, with the largest inflows being from Hounslow and Wandsworth. A secondary tier of flows is evident from Hammersmith and Fulham, Kingston upon Thames and Ealing.

Table 3: Key Sources of Internal In-Migrants

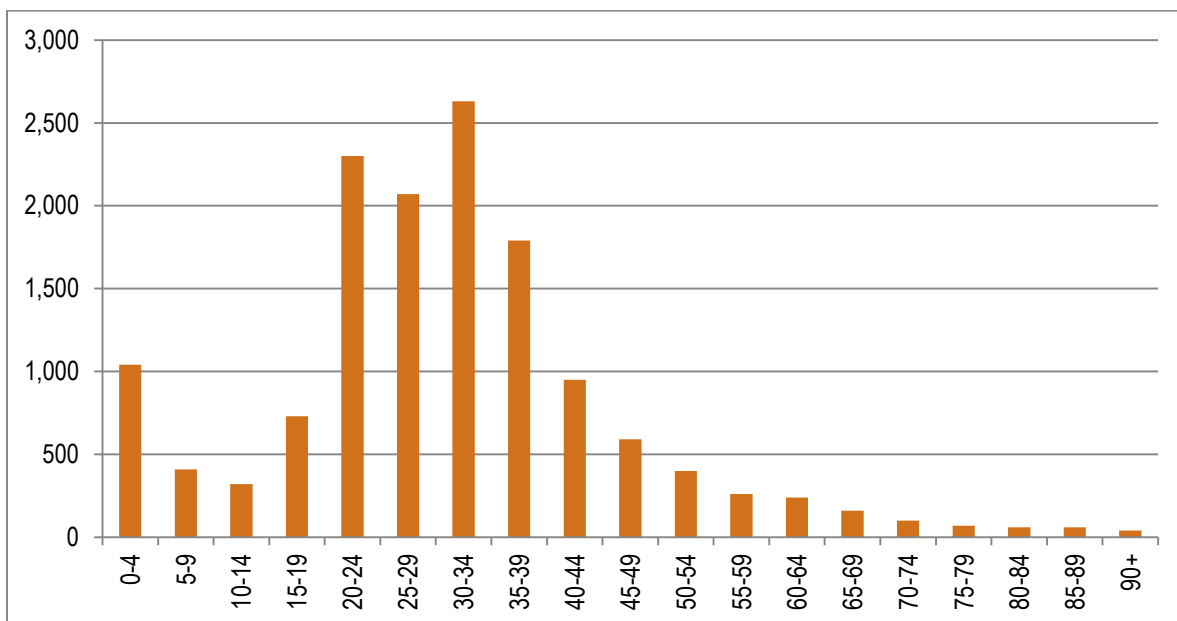
	2011-12	2012-13	2013-14	Average
Hounslow	1400	1670	1650	1570
Wandsworth	1160	1170	1200	1180
Hammersmith and Fulham	670	700	650	670
Kingston upon Thames	560	590	620	590
Ealing	560	550	530	550

Source: ONS Internal Migration Matrices

3.6 For comparison the average inflows from adjoining Surrey authorities are of 230 migrants per annum from Elmbridge and 210 per annum from Spelthorne. It is evident that the inflow from other London Boroughs is significantly greater. In part this will reflect the relative population sizes.

3.7 The chart below profiles the age structure of those moving into the Borough in 2013-14. The main flows are of those in their 20s and 30s, with the largest overall flow of those aged 30-34. The evidence also points to a notable in-movement of young families, given flows of over 1000 children aged 0-4. Typically younger age groups move frequently; but what the Borough's specific profile shows is a notable movement of those in their 30s (some with young children) into the Borough.

Figure 1: Age Structure of Internal In-Migrants, 2013-14

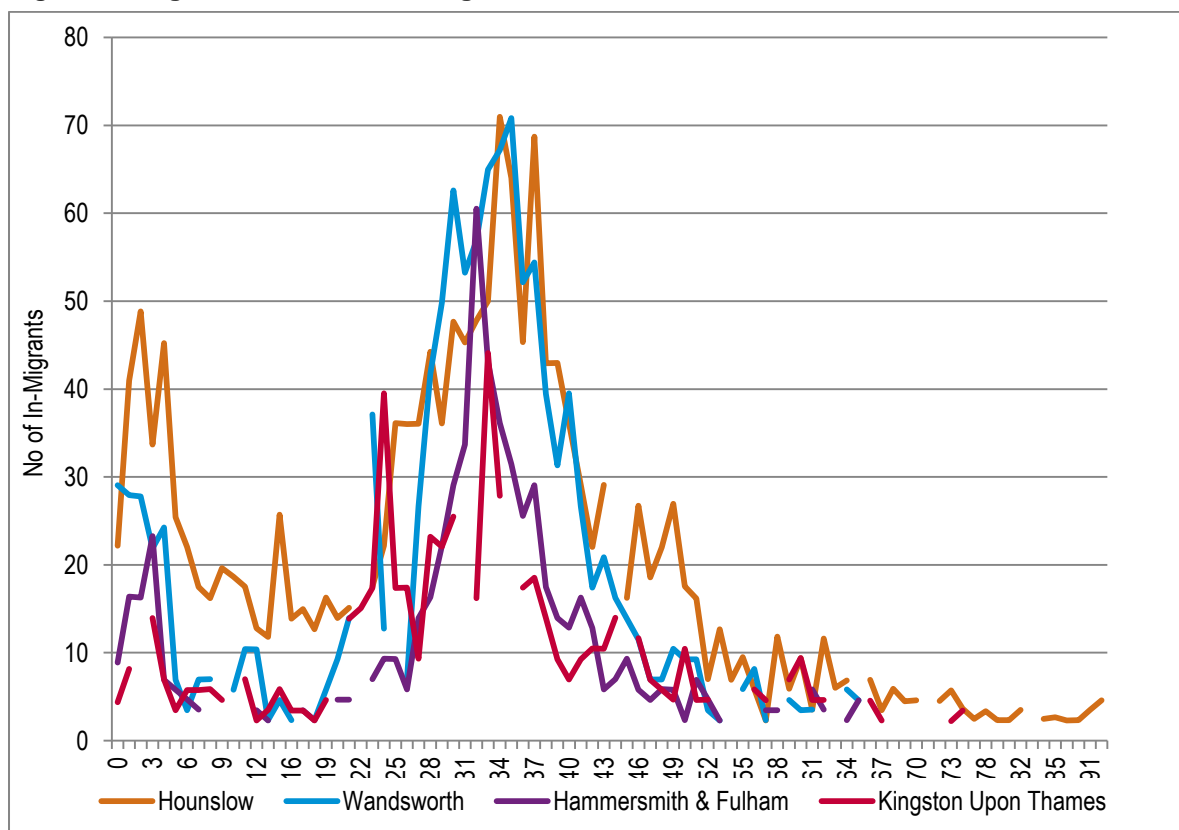


Source: GLH Analysis of ONS Internal Migration Data

3.8 The strongest in-migration flows are from Hounslow and Wandsworth, followed by Hammersmith and Fulham and Kingston. We have used the ONS data to profile the age distribution of in-migrants from these Boroughs in 2013-14, as this will influence the profile of housing demand. The strongest levels of in-migration are of those aged between 28-40 from all of these Boroughs, and of children

aged 0-4; confirming that a notable movement in of young families. Figure 2 does however show a broader age range of movement from those moving from Hounslow (albeit most moves are of those aged under 50). In contrast from Hammersmith and Fulham there is a particularly strong level of movement of those in their late 20s/ early 30s.

Figure 2: Age Distribution of In-Migrants – Main Flows, 2013-14



Source: GLH Analysis of ONS Internal Migration Data

3.9 Of those moving out of the Borough, 40-41% are to other London Boroughs, 15-17% to Surrey, 17-18% to other parts of the South East, and 25-27% to further afield.

Table 4: Internal Out-Migration from London Borough of Richmond

	2011-12	2012-13	2013-14
London	5360	5420	5670
Surrey	2050	2250	2300
Other South East	2370	2330	2340
East of England	760	690	690
Other English Regions	2360	2040	2370
Other Parts of UK	420	360	450

Source: ONS Internal Migration Matrices

3.10 Profiling the top five internal outflows by local authority, the strongest flow is to Hounslow – confirming that this is the local authority with which the Borough is most closely linked. The analysis however shows a relatively strong level of out-migration to Kingston; and in comparison with the analysis of in-migration (where the main flows were with other London Boroughs), Elmbridge and Spelthorne in Surrey see internal out-migration flows which fall within the top 5 locations.

Table 5: Key Destinations of Internal Out-Migrants

	2011-12	2012-13	2013-14	Average
Hounslow	1,340	1,290	1,340	1,320
Kingston upon Thames	710	800	830	780
Wandsworth	650	630	710	660
Elmbridge	680	700	750	710
Spelthorne	490	520	520	510

Source: ONS Internal Migration Matrices

3.11 Bringing the analysis of in- and out-migration flows together, the strongest gross flows (adding the in- and out- migration flows together) are with Hounslow (2,900 persons per annum (ppa), Wandsworth (1,840 ppa) and Kingston-upon-Thames (1,370 ppa).

3.12 Looking at net flows, the picture is one of net in-migration from other London Boroughs (with the exception of Kingston), and a net outflow to areas within Surrey. This is typical of the pattern we see in cities nationally and within London, whereby Inner London sees net in-migration from other areas across the Country and from abroad; and there is then a flow to Outer London Boroughs and into areas in the Home Counties surrounding London. This is partly relates to age structures – where people move to more urban locations in their 20s, and then to move suburban areas in their 30s/ 40s.

Table 6: Average Annual Migration Flows, (2011-14)

London Boroughs	Gross Flow	Net Flow
Hounslow	2900	250
Wandsworth	1840	510
Kingston upon Thames	1370	-190
Hammersmith & Fulham	920	430
Ealing	780	320
Lambeth	650	190
Other London Boroughs	5320	1300
Surrey		
Elmbridge	940	-480
Spelthorne	720	-300
Rest of Surrey	1440	-520

Source: ONS Internal Migration Matrices

3.13 There is evident net out-migration from the Borough to Elmbridge, Spelthorne and other parts of Surrey; as well as to Kingston. As the table below shows, there is a net out-migration to other parts of the South East region (beyond Surrey) and other regions and parts of the UK.

Table 7: Net Migration Flows with LB Richmond, 2011-14

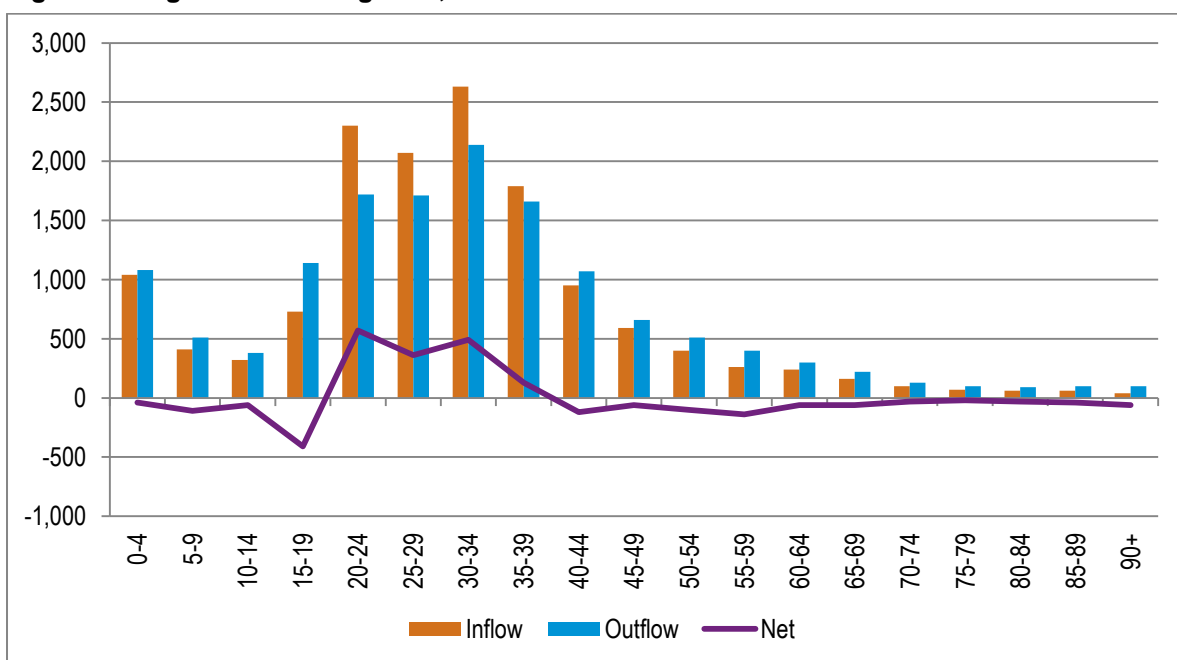
	2011-12	2012-13	2013-14
London	2720	2890	2830
Surrey	-1180	-1450	-1300
Other South East	-820	-810	-860
East of England	-140	-110	-80
Other English Regions	-400	-100	-300
Other Parts of UK	10	30	-90

Source: ONS Internal Migration Matrices

3.14 Figure 3 below compares the age profile of internal in- and out-migrants in 2013-14. It is clear that the strongest migration flows are of those in their 20s and 30s (some of which comprises families with young children). We see a net out-flow of those aged 15-19, and inflow of those 20-24. This is likely to be particularly influenced by flows of students and suggests that despite the presence of a university in the Borough, flows of residents to universities elsewhere are stronger.

3.15 A net inflow is shown of those aged in their late 20s and in their 30s, with net outflows of internal migrants for all age groups over 50. A particularly strong net outflow is shown of those aged 55-59 representing households approaching retirement.

Figure 3: Age Profile of Migrants, 2013-14

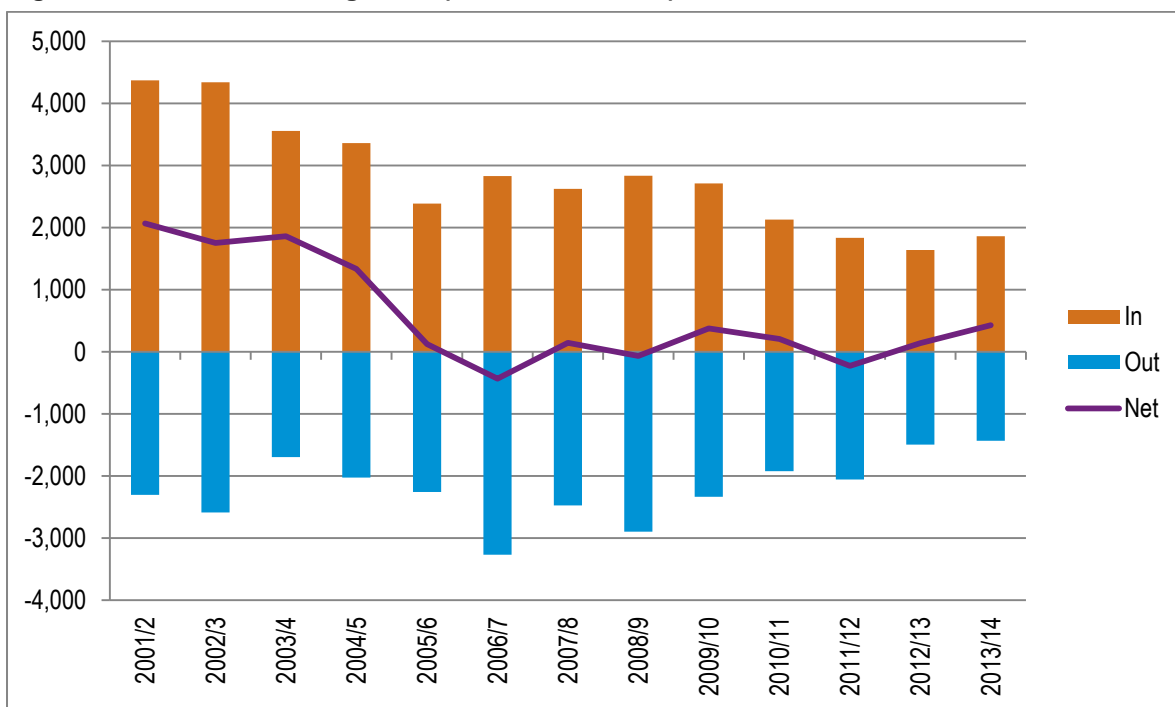


Source: ONS Internal Migration Data

International Migration

- 3.16 The Department for Work and Pensions records the nationality of people registering for a National Insurance number and the location of their registration. The latest available dataset shows that in the year up to September 2015 almost 860,000 registrations were made in the UK from overseas nationals. Of these approximately 40% were registered in London (approx. 340,000) but less than 1% of the London figure were in Richmond upon Thames. For comparison neighbouring Hounslow registered almost 4.5 times as many overseas nationals (11,800) and Newham, which had the highest level in the country with 27,000 person registering.
- 3.17 According to the ONS components of change data, since 2001 international in-migration has broadly decreased. Starting at a peak of 4,368 people moving to the borough from overseas in 2001 this has fallen to 1,636 in 2012/13. This falling level of international in-migration has been somewhat counter-balanced by decreasing international outmigration, although net migration has reduced significantly and is in a broad balance.

Figure 4: International Migration (2001/2 to 2013/14)

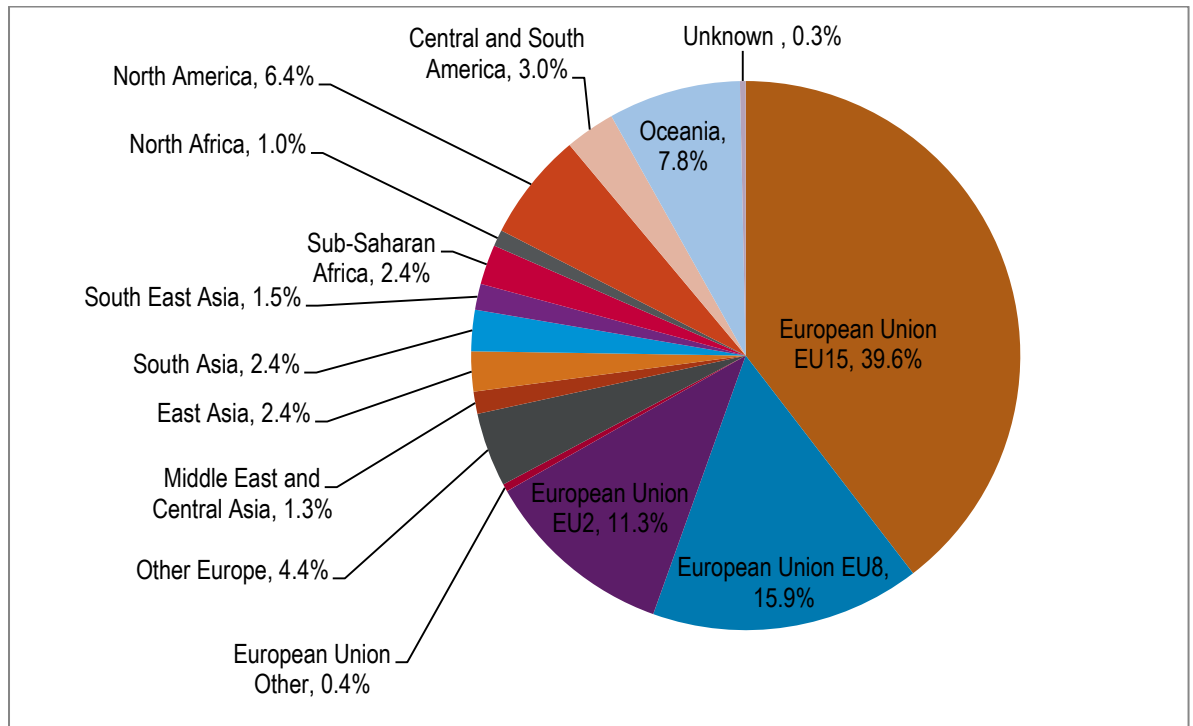


Source: ONS Components of Change, 2015

- 3.18 In contrast international in-migration across London steadily increased between 2001/2 and 2006/7 and has plateaued since. A similar pattern appears with net migration which has continuously positive over the same period.

3.19 As shown in Figure 5, the vast majority of new registrations in Richmond are from other European Union countries (67.3%) with a further 4.4% coming from other European countries. The largest migrant numbers from outside the EU are from Oceania (7.8%) and North America (6.4%). Around 7.6% of new residents come from Asia with similar number coming from East Asia and South Asia.

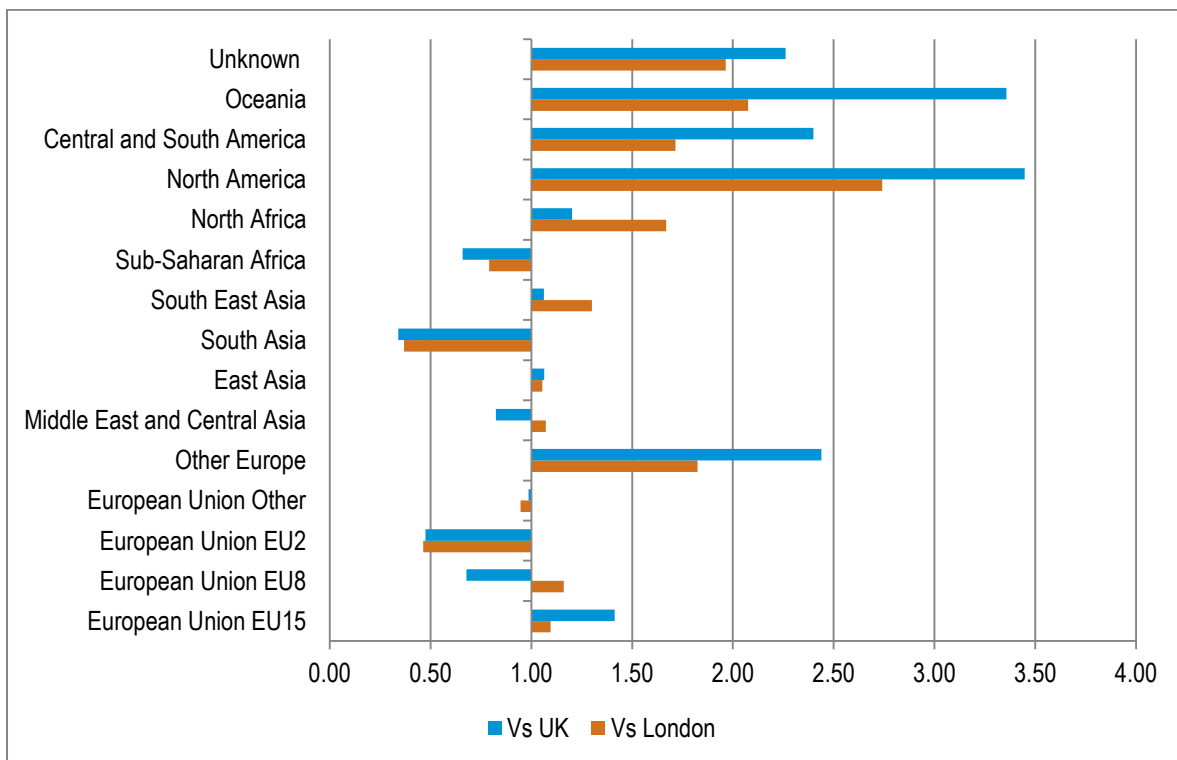
Figure 5: Origin of New National Insurance Registrations in LB Richmond (2015)



Source: DWP (2016)

3.20 In comparison to both greater London and the UK, LB Richmond has a substantially higher proportion of new registrations from Oceania, North America as well as higher numbers from Central and South America and non EU European countries.

Figure 6: Location Quotient of Origin of New Registrations in LB Richmond (2015)



Source: DWP (2016)

3.21 In contrast the Borough has a much lower percentage of registrations from people coming from EU2 countries (Romania and Bulgaria), South Asia and Sub-Saharan Africa. This suggested that those arrive in the Borough have a generally higher level of affluence than elsewhere in the City.

Commuting Patterns

3.22 The 2011 Census data showed 99,916 residents in the Borough in employment. Table 8 profiles where residents work. In total 36% work within the Borough, either at home or at a place of work that is within the Borough boundary. A similar level (35%) commute to Inner London Boroughs. There are also commuting flows to other adjoining authorities, particularly to Hounslow (8%).

Table 8: Where Residents Work, 2011

	No Persons	% Resident Workforce	% Resident Workforce (excl. Offshore/ No Fixed Place)
At/ from Home	14,156	14.2%	15.4%
Other Location within the Borough	18,671	18.7%	20.3%
<i>Self-Containment within the Borough</i>	32,827	32.9%	35.7%
Inner London			
Inner London Boroughs	32,297	32.3%	35.2%
... of which			
Westminster & the City	14,773	14.8%	16.1%
Hammersmith & Fulham	3,441	3.4%	3.7%
Camden	2,978	3.0%	3.2%
Wandsworth	2,128	2.1%	2.3%
Tower Hamlets	2,121	2.1%	2.3%
Outer London			
Hounslow	7,102	7.1%	7.7%
Kingston upon Thames	3,479	3.5%	3.8%
Hillingdon	2,149	2.2%	2.3%
Other Outer London Boroughs	4,023	4.0%	4.4%
<i>Self-Containment within London</i>	67,721	67.8%	73.7%
Surrey & South East			
Surrey	5,194	5.2%	5.7%
Other South East	3,515	3.5%	3.8%
Inter-regional and International			
Other UK Regions	1,246	1.2%	1.4%
Offshore/ Overseas	450	0.5%	0.5%
No Fixed Place	7,634	7.6%	8.3%

Source: GLH Analysis of 2011 Census

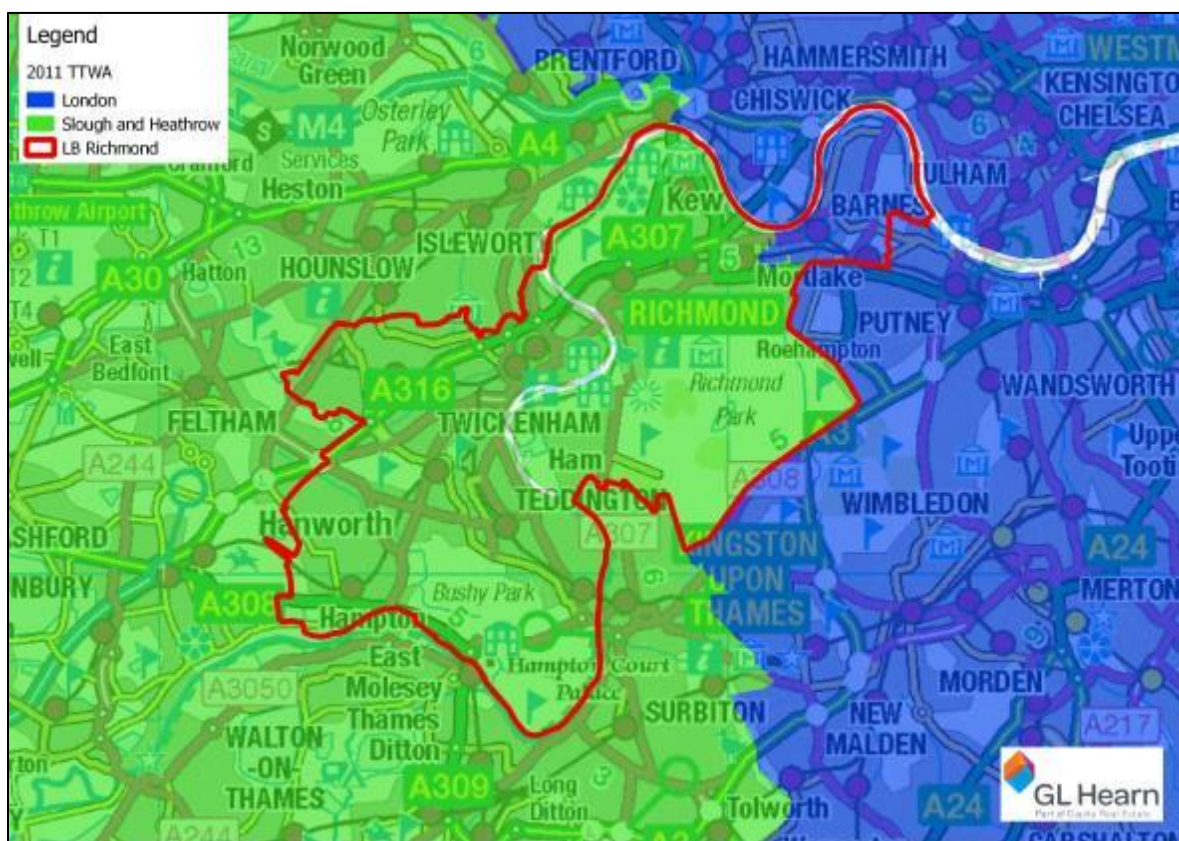
- 3.23 Turning to look at where the Borough's workforce is drawn from, 46% work at home or another location in the Borough. 11% commute from Hounslow; with 5% from Kingston and 4% from Wandsworth. These are the principal flows. In total 83% of the workforce lives within Greater London.

3.24 In 2015 the ONS published a national set of Travel to Work Areas which drew from the 2011 census. The ONS' "Introduction to Travel to Work Areas"⁷ (October 2007) sets out the criteria for defining TTWAs.

"that at least 75% of the area's resident workforce work in the area and at least 75% of the people who work in the area also live in the area. The area must also have a working population of at least 3,500. However, for areas with a working population in excess of 25,000, self-containment rates as low as 66.66% are accepted."

3.25 As shown in Figure 7 below the London Borough of Richmond is split across two different Travel to Work areas. The eastern part of the Borough including Barnes and Sheen fall within the London TTWA with the remainder falling within the Slough and Heathrow TTWA.

Figure 7: 2011 ONS Travel to Work Areas



Source: ONS, 2015

3.26 The previous 2001 Travel to Work Area definitions place the entire Borough within the London Travel to Work area. The changing definition highlights the growing importance of Heathrow as an employment location.

⁷ "Introduction to Travel to Work Areas" (ONS October 2007) - <http://www.ons.gov.uk/ons/guide-method/geography/beginner-s-guide/other/travel-to-work-areas/index.html>

Table 9: Where the Borough's Workforce is drawn from, 2011

	Number	%
At/ from Home	14,156	19.8%
Within the Borough	18,671	26.1%
Hounslow	7,752	10.8%
Kingston upon Thames	3,755	5.3%
Wandsworth	2,674	3.7%
Spelthorne	2,111	3.0%
Elmbridge	2,083	2.9%
Ealing	1,970	2.8%
Merton	1,264	1.8%
Hammersmith and Fulham	1,147	1.6%
Other London Boroughs	8,095	11.3%
Other Surrey Authorities	2,881	4.0%
Rest of South East	3,117	4.4%
Elsewhere within the UK	1,802	2.5%

Source: GLH Analysis of 2011 Census

- 3.27 In total, 38,561 persons commute daily into the Borough to work, but 59,455 commute out to work elsewhere, giving a net level of out-commuting of 20,804 persons daily. This is equivalent to 21% of the resident workforce. Table 10 below analyses flows with key locations. There is a net out-flow of 25,481 persons daily to Inner London Boroughs, of which 14,452 is to the City and Westminster.
- 3.28 The evidence points to modest net commuting inflows from a number of surrounding boroughs, including Wandsworth, Hounslow and Kingston; as well as from Surrey. There is a net outflow to Hillingdon, most likely reflecting employment at Heathrow Airport.

Table 10: Net Commuting Flows, 2011

	Outflow	Inflow	Net
Inner London Boroughs	32297	6,816	-25,481
... of which			
Westminster & the City	14773	321	-14,452
Hammersmith & Fulham	3441	1,147	-2,294
Camden	2978	303	-2,675
Wandsworth	2128	2,674	546
Tower Hamlets	2121	248	-1,873
Outer London Boroughs			
Hounslow	7102	7,752	650
Kingston upon Thames	3479	3,755	276
Hillingdon	2149	706	-1,443
Surrey			
Surrey	5194	7,075	1,881

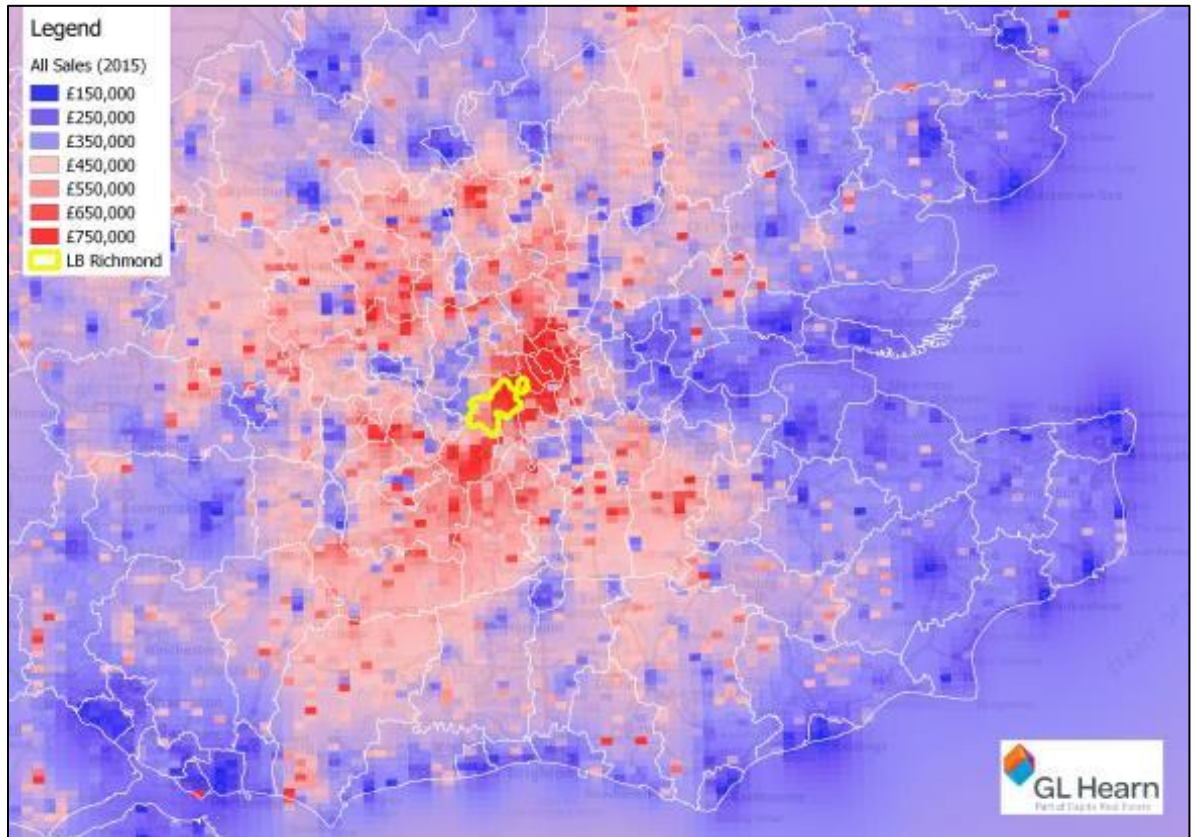
Source: GLH Analysis of 2011 Census

- 3.29 The analysis highlights the inter-connected nature of the labour market in the area, with strong links with other parts of London and some adjoining areas within Surrey which economically are closely linked. It makes little sense trying to precisely balance jobs and workforce at the Borough level.

House Price Dynamics

- 3.30 Detailed analysis of house price dynamics as set out in more detail within Chapter 8. This section seeks to address the differences within the wider West and Central London context. Where possible we have drawn on price paid data published by the Land Registry. This is the most up to date data source on house prices available.
- 3.31 The wider market dynamics is illustrated in Figure 8 below perhaps as expected the highest house prices are found in Central London. This core area of high house prices extends to much of the eastern parts of the London Borough of Richmond upon Thames.
- 3.32 There are other notable areas of higher house prices in moving into the commuter belts of Surrey, Bucks and Oxfordshire. Figure 8 also illustrates the clear east/west split with prices to the west of the capital significantly higher than those areas immediately to the east.

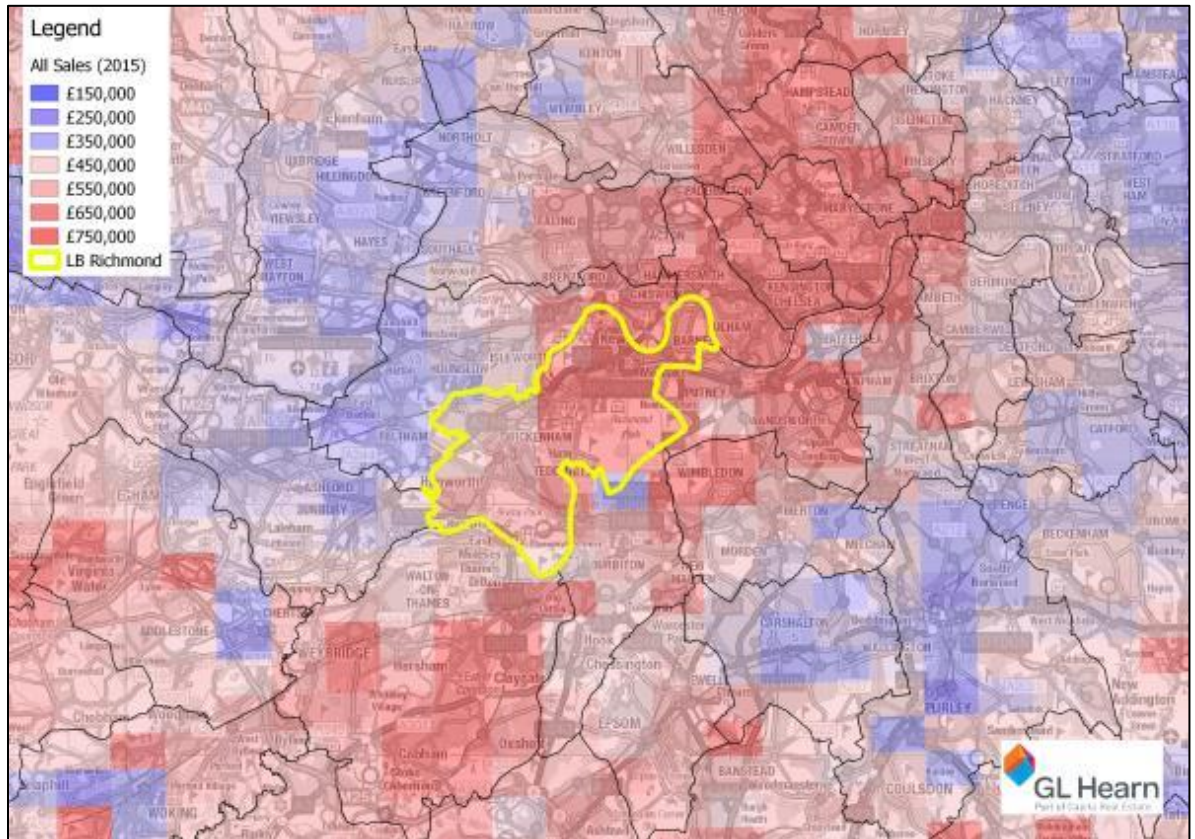
Figure 8: Average House Price (Greater South East) – 2015



Source: HMLR, 2016

- 3.33 We have also analysed more local dynamics which again show, but in more detail areas of higher and lower house prices in the borough and the immediately surrounding areas. One must be mindful however that the average house price tends to reflect the stock with higher prices expected in areas with more detached homes and lower prices in flatted areas.
- 3.34 As shown in Figure 9 house prices in the Sheen, Mortlake and Barnes area of the Borough are significantly higher than those in the Hampton area. This is likely to reflect the connectivity with Central London.
- 3.35 By comparison house prices in the Borough are higher than those immediate to the north and south. There is a particularly notable drop off in price to the north into Hounslow. This in part will reflect the prevalence of flatted and terraced stock in Hounslow but also the quality of place.
- 3.36 Richmond benefits from access to two large royal parks, the River Thames and historic environment and also has excellent connectivity. While Hounslow also has excellent connectivity, access to open spaces is more limited and the proximity to Heathrow results in some noise issues, particularly for those living beneath the flight path.

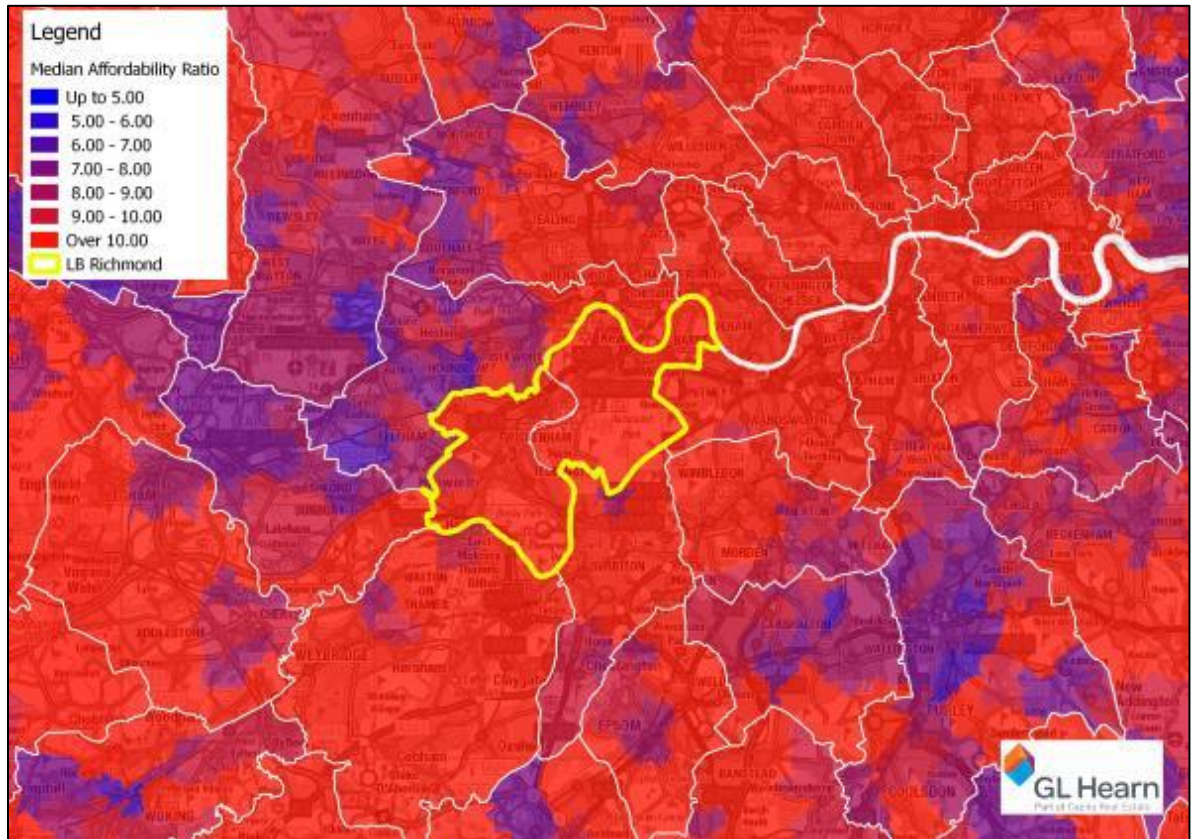
Figure 9: Local House Prices (2015)



Source: HMLR, 2016

- 3.37 It is also important to understand house prices relative to earnings. To do this we have used the ONS affordability data which calculates the ratio between house prices and earnings at Middle Super Output Area (MSOA) level. Although only recently published, the latest data reflects 2011 ratios. As shown in Figure 10, affordability is an acute issue in the Borough with almost the entire borough having house prices which are more than 10 times income.

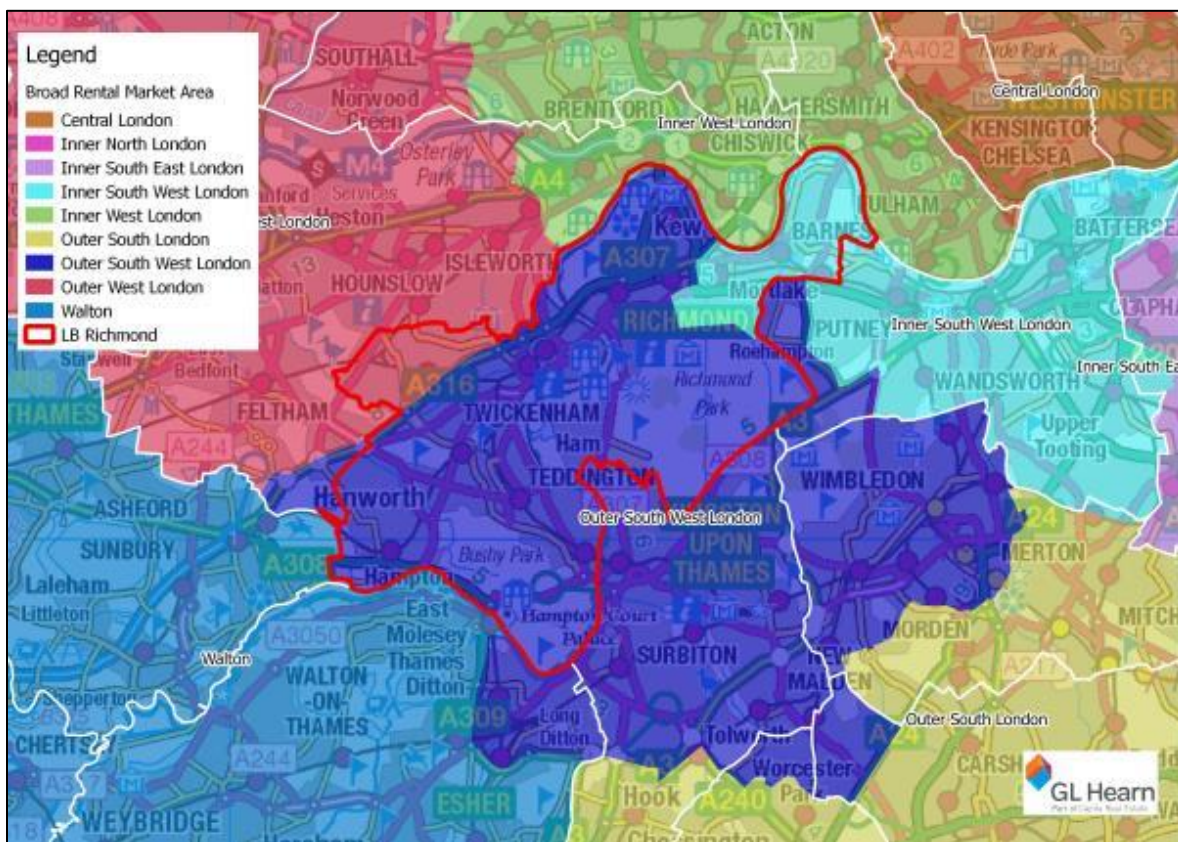
Figure 10: Affordability Ratio by MSOA (2011)



Source: ONS, 2015

- 3.38 The only area which has a ratio of less than 10 is the northern part of Hampton, although this area still has a ratio of around 9.5. There is also a stark difference in affordability between the Borough relative to Hillingdon, Hounslow and Spelthorne.
- 3.39 The Broad Rental Market Area (BRMA) is an area defined by the Valuation Office Agency and is the area within which a Local Housing Allowance claimant could reasonably be expected to live taking into account access to facilities and services. It is also the area to which local housing allowance is benchmarked. As illustrated in Figure 11, there are three Broad Rental Markets which operate across the Borough.

Figure 11: Broad Rental Market Areas



Source: VOA, 2014

- 3.40 The eastern part of the Borough including Barnes, Sheen and Mortlake are located within the Inner South West London BRMA which extends across most of Wandsworth Borough and into a small part of Lambeth and Merton.
- 3.41 The majority of the Borough is located in the Outer South West London BRMA which also includes most of Merton including Wimbledon and small parts of Hounslow, Kingston, Elmbridge and Epsom and Ewell.
- 3.42 A small part of the Borough in Whitton is located within the Outer West London BRMA.

Implications

- There are strong housing market and economic inter-relationships across borough boundaries within London, and between LB Richmond and parts of Surrey. The greatest proportion of people moving to the Borough are from other South West London or West London Boroughs.
- The analysis shows that the strongest relationships (in terms of migration moves) are with Hounslow, Wandsworth and Kingston. The strongest commuting flow is with Inner London – with net out-commuting of 20,800 persons daily, equivalent to 21% of the resident workforce. Beyond this the strongest commuting relationships are also with these three adjacent boroughs.
- Of those moving into the Borough, the strongest flow is of people in their 20s and 30s, and in particular those in their late 20s or early 30s with (or soon to have) young children. The Borough is an attractive place to have a family.

4 THE BOROUGH'S POPULATION

4.1 The Borough had a population of 193,600 in mid-2014. This has grown from 186,990 at the time of the last census indicating a 3.5% increase in just three years. In 2001 the population was recorded as 172,335. In 2011 there were 76,146 households making the average household size 2.45 persons.

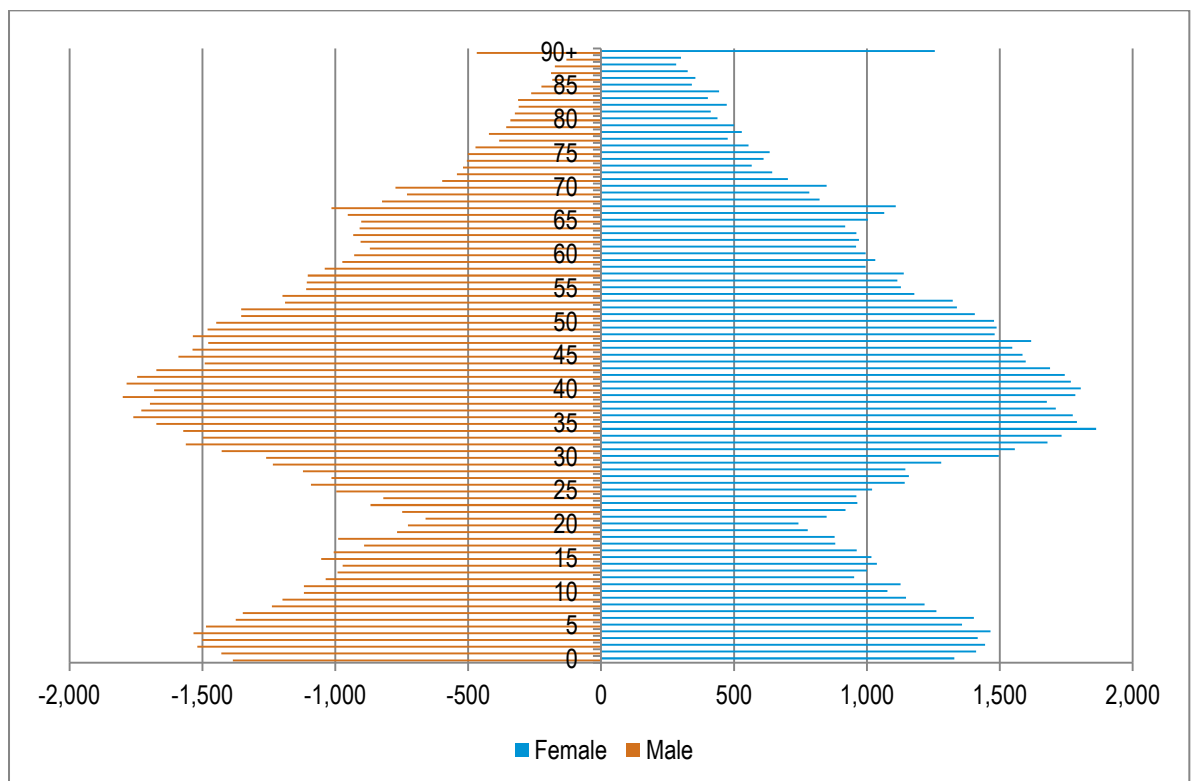
4.2 Much of the analysis in this section of the report reflects 2014 data which aligns with the start of the plan period. However subsequent to much of the analysis within this section being produced the 2015 mid-year estimates were published. These showed that the population in the Borough had grown to 194,730 (a yearly growth of 0.6%).

Population Analysis

Age Structure

4.3 The largest age groups within the Borough's population are of those aged between 30-48. Children aged under 7 are also relatively strongly represented. There is also a notable population aged 90 and over although this is an open ended group (see Figure 12 below).

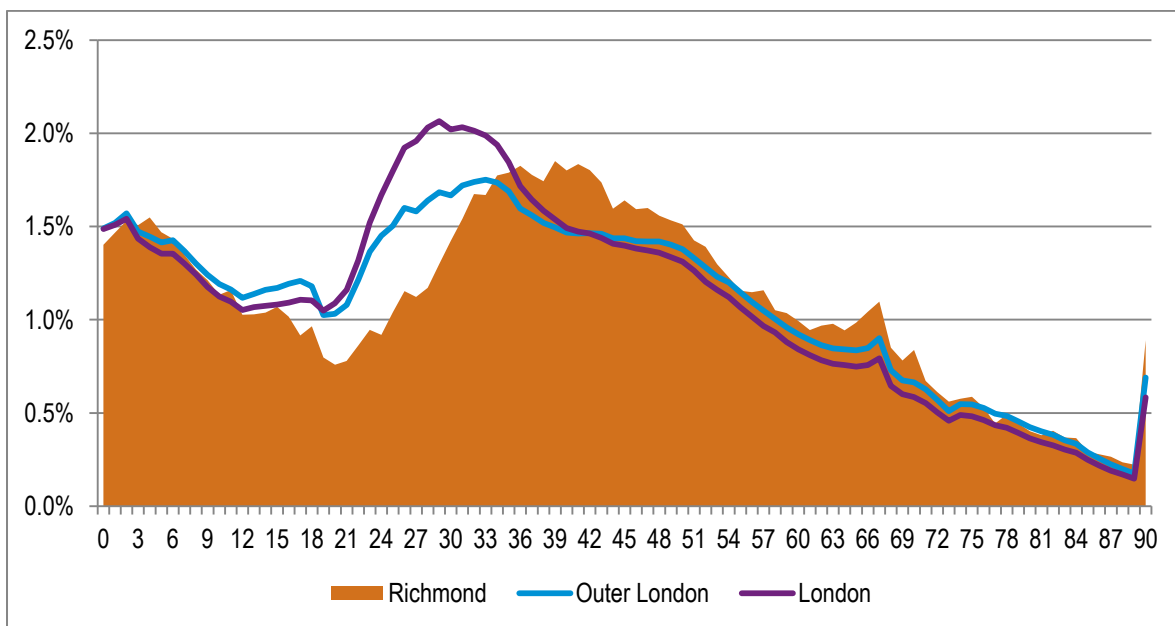
Figure 12: Population Pyramid LB Richmond (2011)



Source: Census, 2011

4.4 Figure 13 compares the age profile in the Borough to that in London and Outer London. As illustrated the Borough has a higher percentage of population at almost every age point older than 35. This in turn has resulted in a slightly higher percentage of very young children in the Borough.

Figure 13: Distribution of Population by Age (2011)



Source: Census, 2011

4.5 In contrast there is a much higher percentage of population in London and Outer London in their 20s. This suggests that the Borough is typically attractive to slightly older ‘family-makers’ and is affordable for those in older age groups.

4.6 The 2015 Mid-Year Estimates show that in the last year there was a proportionally large growth in the 16-24 and 50-64 age groups (both 3%). Conversely there was decline of around 1,100 people in the 25-49 age group which equates to a fall of 1%.

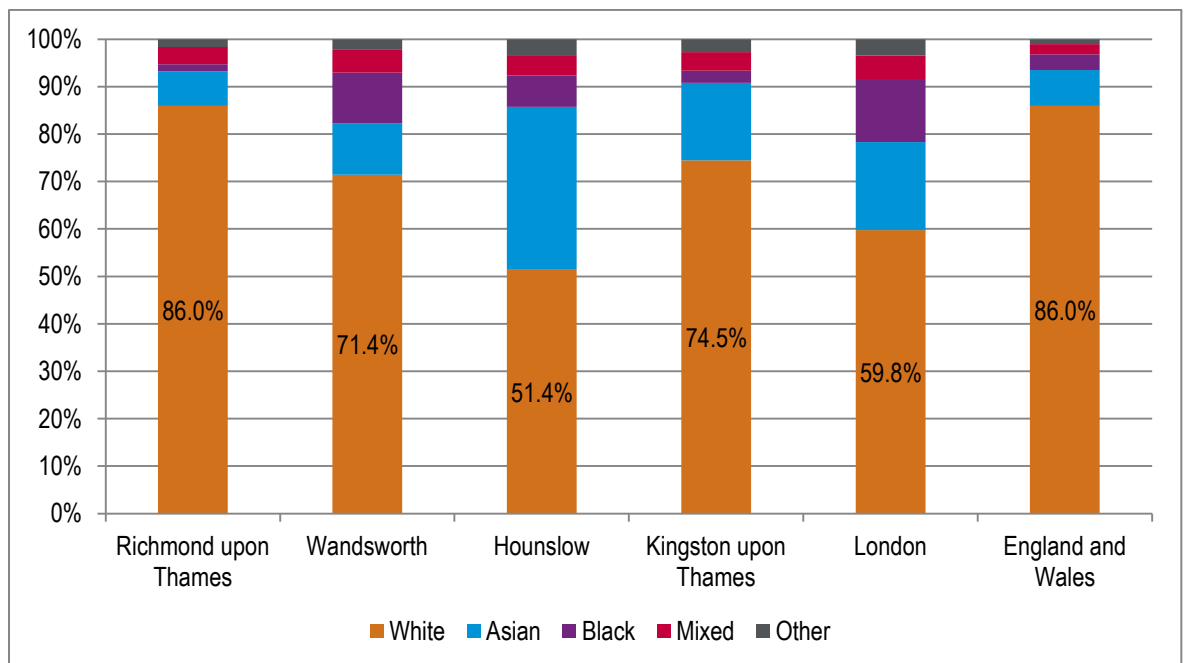
Ethnicity

4.7 Figure 14 profiles population by the ethnic group in LB Richmond and neighbouring comparator areas including LB Wandsworth, LB Hounslow, LB Kingston upon Thames, London and England and Wales. These key areas are consistently used as comparators across the report; they have been chosen as the neighbouring London Boroughs for comparisons, with other general comparisons to Surrey and London made on the occasional basis in order to understand the context of the borough on the edge of London.

4.8 Richmond upon Thames is a far less diverse area than any of the wider comparator areas. The white population comprises 86% of the population which is in line with England and Wales, but far lower than London (59.8%). Amongst its white population, it has a higher proportion of White English population (83%) than when compared to Hounslow (74%) or Wandsworth (75%). It has a slightly lower proportion than Kingston upon Thames (85%).

4.9 The largest BME group in the Borough is the Asian population which equates to 7.6% of the total population of which the largest group is of Indian people. The mixed race population is the most comparable with the wider comparators but still slightly below those other areas.

Figure 14: Population by Ethnicity (2011)

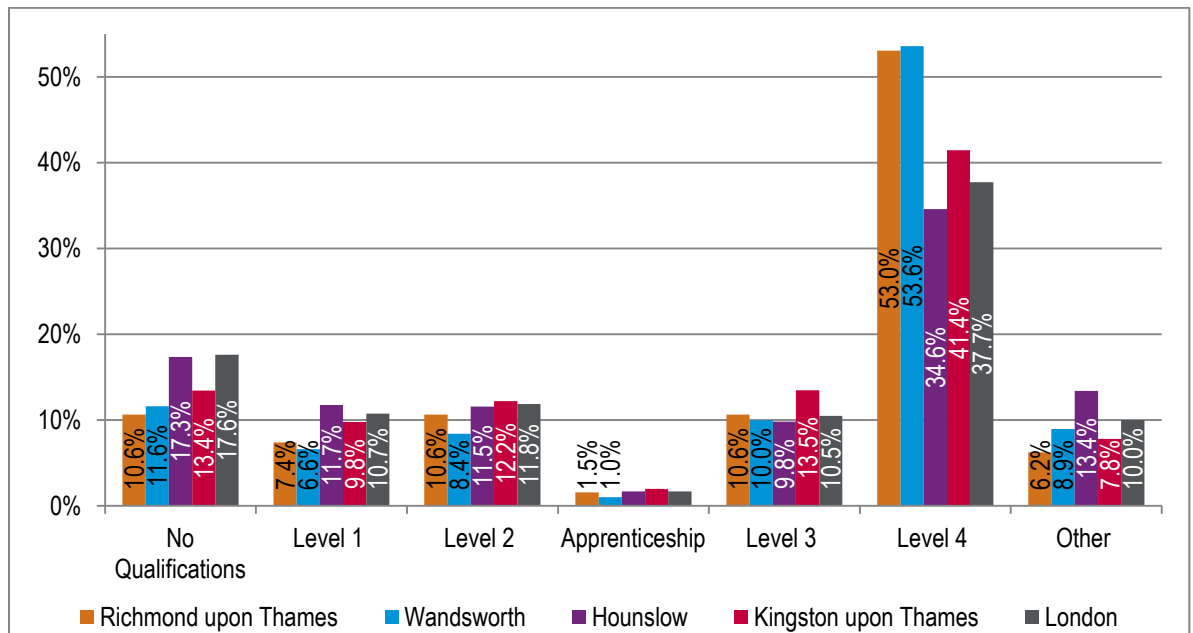


Source: Census, 2011

Qualifications

4.10 Both LB Richmond and LB Wandsworth have a significantly higher population qualified to at least level 4, which is the equivalent of an under-graduate degree. In contrast both Boroughs have similarly few residents with no qualifications (see Figure 15). The skills profile is evidently strong.

Figure 15: Level of Education Attained (2011)

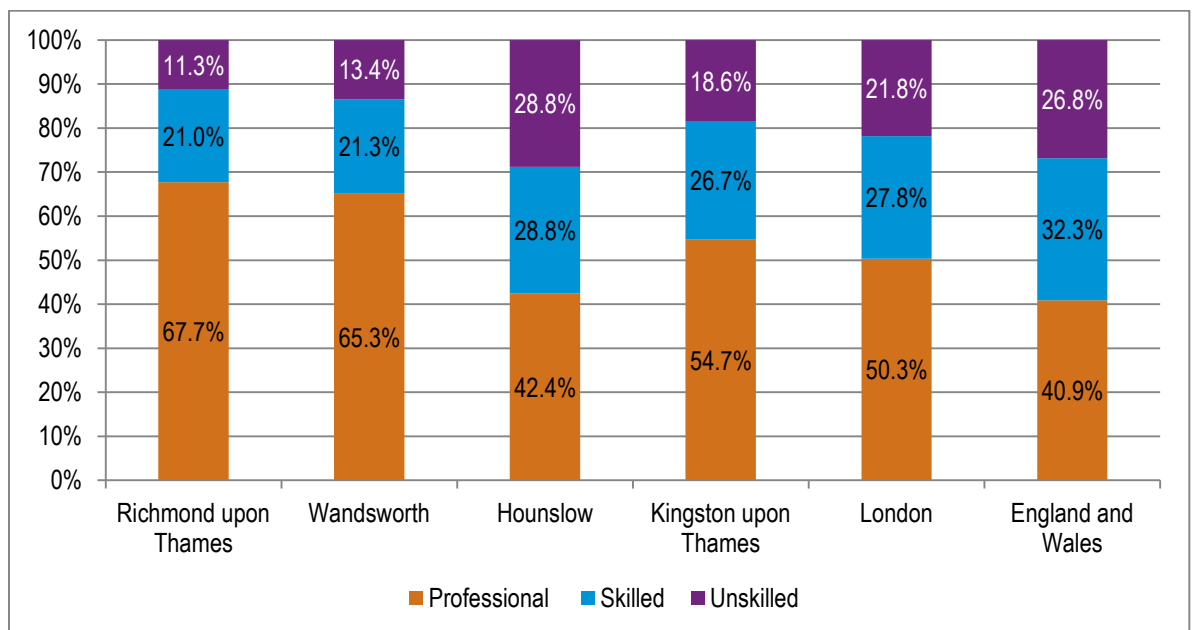


Source: Census, 2011

Occupation

4.11 The highly qualified nature of the Richmond population is directly reflected in the percentage of residents working in Professional Occupations (67.7%). This is significantly higher than the London (5.3%) and National Figures (40.9%).

Figure 16: Broad Occupation Level of Residents (2011)



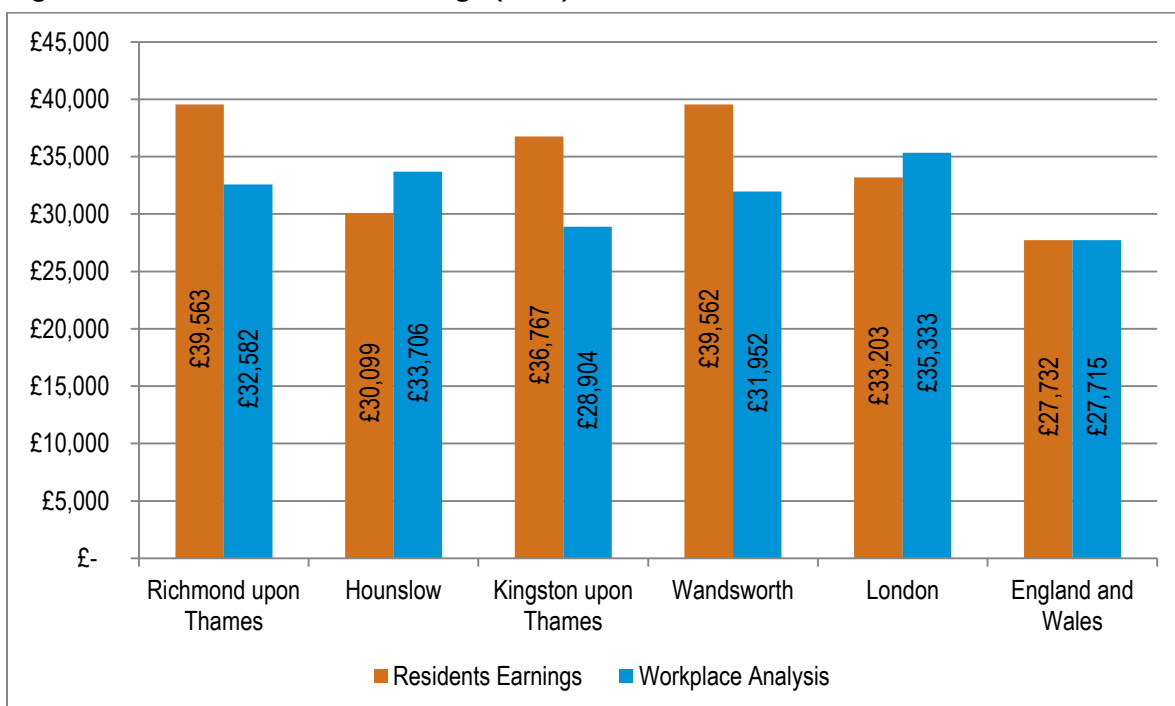
Source: Census, 2011

4.12 Only 11% of the Borough residents work in an unskilled profession. This is similar to the levels in Wandsworth (13.4%) but much lower than in Hounslow (28.8%).

Earnings

4.13 At £39,563 per annum, Richmond also has the highest median earnings of the areas considered, although it is almost identical level to Wandsworth. The median earnings in the Borough are around £6,000 higher than the equivalent figure in London (£33,203) and £12,000 higher than England and Wales (£27,732).

Figure 17: Median Full-Time Earnings (2015)



Source: Annual Survey of Hours and Earnings, 2011

4.14 Workplace earnings in the Borough are also significantly lower (£32,852 per annum) than resident earnings suggesting a level of out migration to high paying jobs (see Table 11), as is the case for many Outer London Boroughs. Average workplace earnings are still around £5,000 higher than the England and Wales median (£27,715).

Deprivation

4.15 The Department of Communities and Local Government (CLG) published the latest version of their Index of Multiple Deprivation in 2015. The index ranks every local authority and Lower Super

Output Area (LSOA) across England in terms of how deprived it is. The indices cover a range of topics and are also combined for an overall deprivation score.

- 4.16 Overall the Borough is ranked 296 out of 326 local authorities in terms of deprivation putting in in the least deprived 10% of Boroughs nationally. It performs strongly across most indicators.

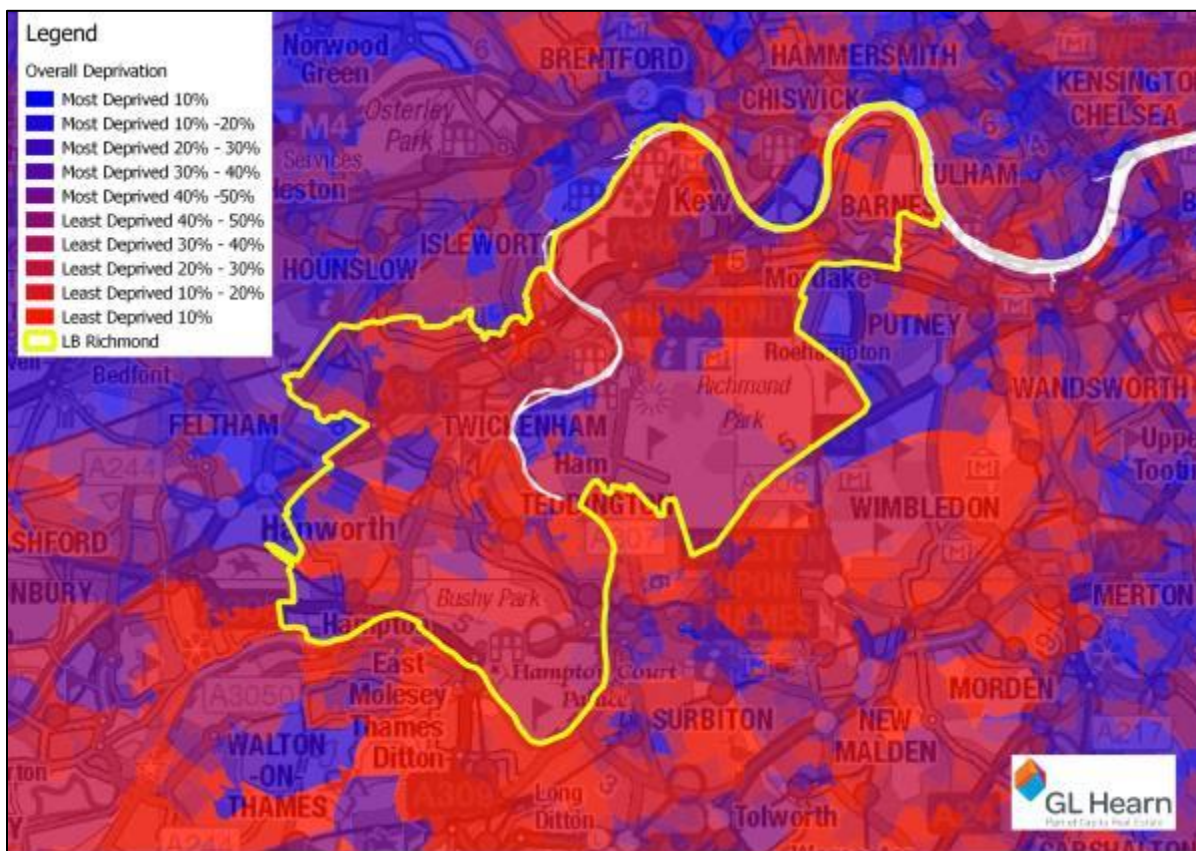
Table 11: Index of Multiple Deprivation Ranking for LB Richmond

Index	LA Ranking (of 327 with 1 being most deprived)	National Percentile	% of LSOAs in most deprived 10%
Overall	296	90.5%	0.0%
Income	293	89.6%	0.0%
Employment	313	95.7%	0.0%
Education	326	99.7%	0.0%
Health	319	97.6%	0.0%
Crime	105	32.1%	0.9%
Barriers to Housing & Services	190	58.1%	1.7%
Living Environment	48	14.7%	2.6%

Source: GLH Analysis of CLG IMD, 2015

- 4.17 Figure 18 below illustrates the overall relative deprivation in LB Richmond and the immediately surrounding areas. As shown the Borough is relatively affluent although there are pockets of deprivation within the Borough.

Figure 18: Overall Deprivation (2015)



Source: GLH Analysis of CLG IMD, 2015

4.18 According to this index the parts of the Borough fall within the most affluent 10% of the Country including parts of Teddington, Hampton, Mortlake, Barnes and Twickenham. Although no parts of the Borough are in the most deprived 10% nationally one part does fall within the lowest 20%, that is the area around Oak Avenue in Hampton on the boundary with Hounslow. Some of the more deprived parts of the borough are covered by open space including parts of Richmond Park and Ham Lands which may limit the amount of data.

Housing and Households

4.19 In 2011 there were 79,835 households in the Borough which is a 4.8% increase since 2001 (76,146). These are accommodated in 82,827 dwellings. Table 12 below sets out the percentage of all households within certain household typologies.

Table 12: Scale of Selected Household Types (2011)

	One Person Households	All pensioner Households	With Dependent Children	With Non-Dependent Children	All Student Households	"Other" Households
Richmond upon Thames - No.	26,008	13,895	23,648	9,223	285	4,417
Richmond upon Thames - %	32.6%	17.4%	29.6%	11.6%	0.4%	5.5%
Wandsworth	32.3%	10.5%	24.3%	8.8%	0.7%	15.5%
Hounslow	27.4%	13.2%	34.5%	8.9%	0.5%	9.2%
Kingston upon Thames	28.6%	16.5%	30.9%	10.8%	2.0%	6.5%
London	31.6%	13.9%	30.9%	8.3%	0.7%	9.4%
England and Wales	30.2%	20.9%	29.1%	12.3%	0.6%	4.4%

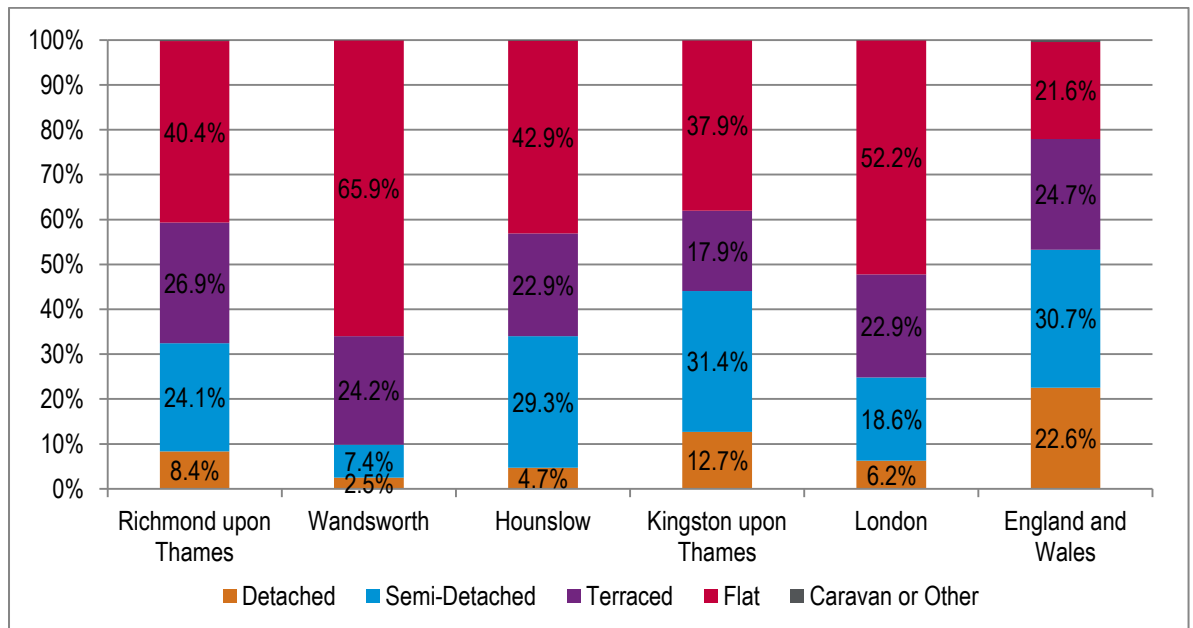
Source: Census, 2011 (note there can be some overlap in these groups)

- 4.20 As shown the Borough has a higher percentage of Single Person Households, All Pensioner Households and Households with Non-dependent Children than the other comparator Boroughs and London and a whole.
- 4.21 Almost 5.5% of households in the Borough are terms as "other" household types which are shared households of more than one unrelated adults. This is a relatively low level compared to the local comparators but above that in England and Wales (4.4%).

Type

- 4.22 Just over 40% of household spaces in Richmond upon Thames are flats, the majority of which are purpose built. This is significantly higher than the equivalent figure of England and Wales (21.6%) but below the London Figure (52.2%).

Figure 19: Household Spaces by Type (2011)



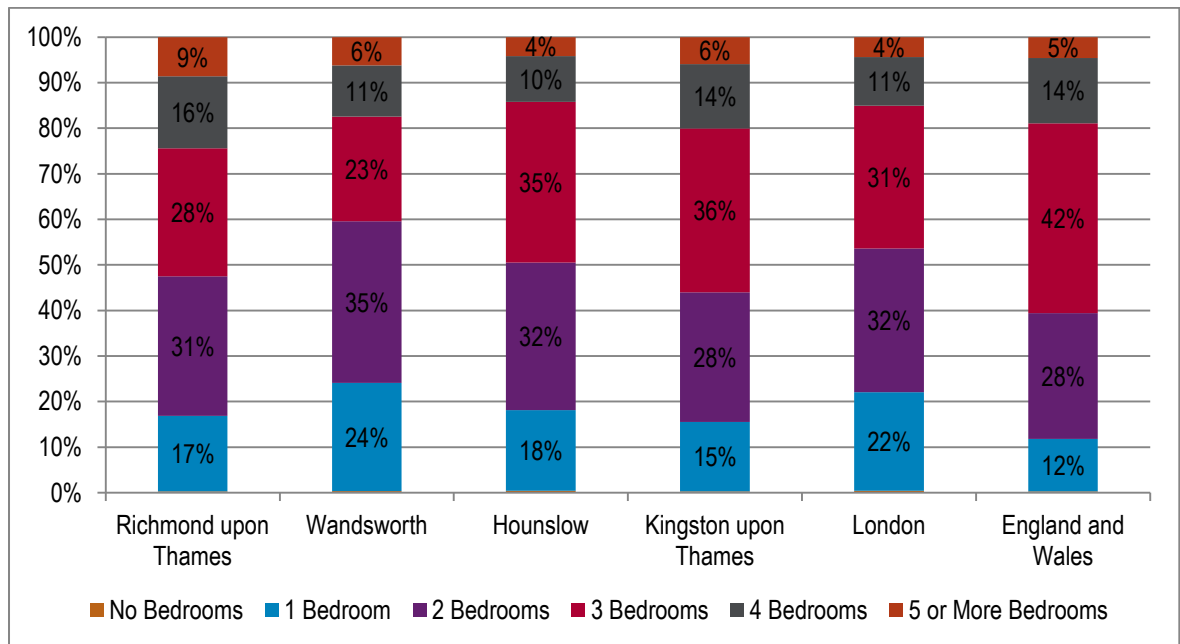
Source: Census, 2011

4.23 The Borough also has a higher percentage of detached properties (8.4%) than most of London but significantly fewer than England and Wales (22.6%).

Size

4.24 Around 24% of all household spaces in the Borough have over 4 or more bedrooms. This is slightly higher than the comparable Boroughs and also the equivalent figures for London (15%) and England and Wales (19%).

Figure 20: Household Spaces by Number of Bedrooms (2011)



Source: Census, 2011

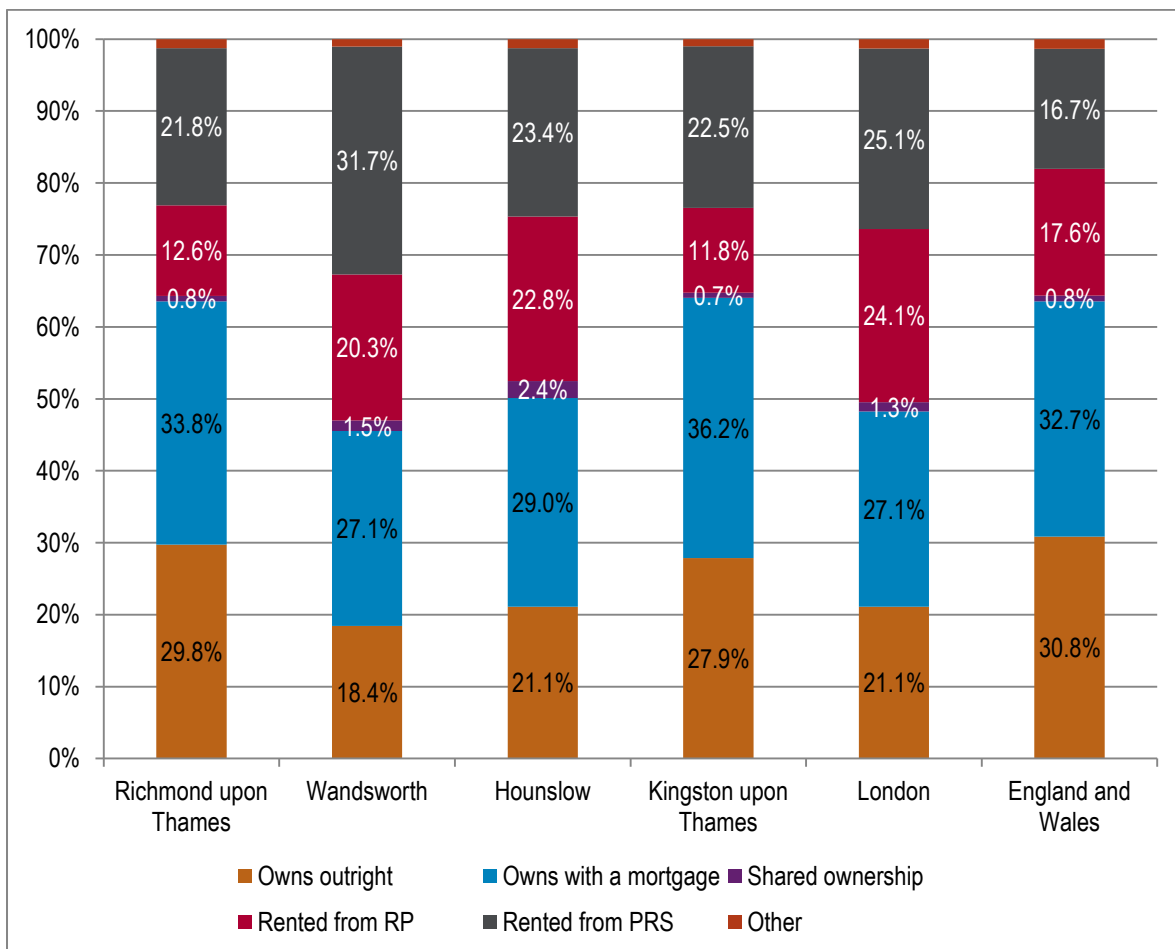
4.25 Only 19% of the household spaces in the Borough have 1 bedroom which is lower than all of the comparable areas shown but for Kingston upon Thames (15%) and England and Wales (12%).

Tenure

4.26 Almost two thirds of the households in the Borough (63.6%) own their own homes which is the same as the England and Wales figure; although the Borough has a slightly higher percentage of households who own their own properties outright.

4.27 As shown in Figure 21, the social rental sector equates to 12.6% of all households which is wholly driven by those renting from registered providers. Following Large Scale Voluntary Transfer (LSVT) in 2000 the borough has none of its own housing stock. The reliance on the socially rented sector is lower in Richmond than in Wandsworth and Hounslow and London as a whole.

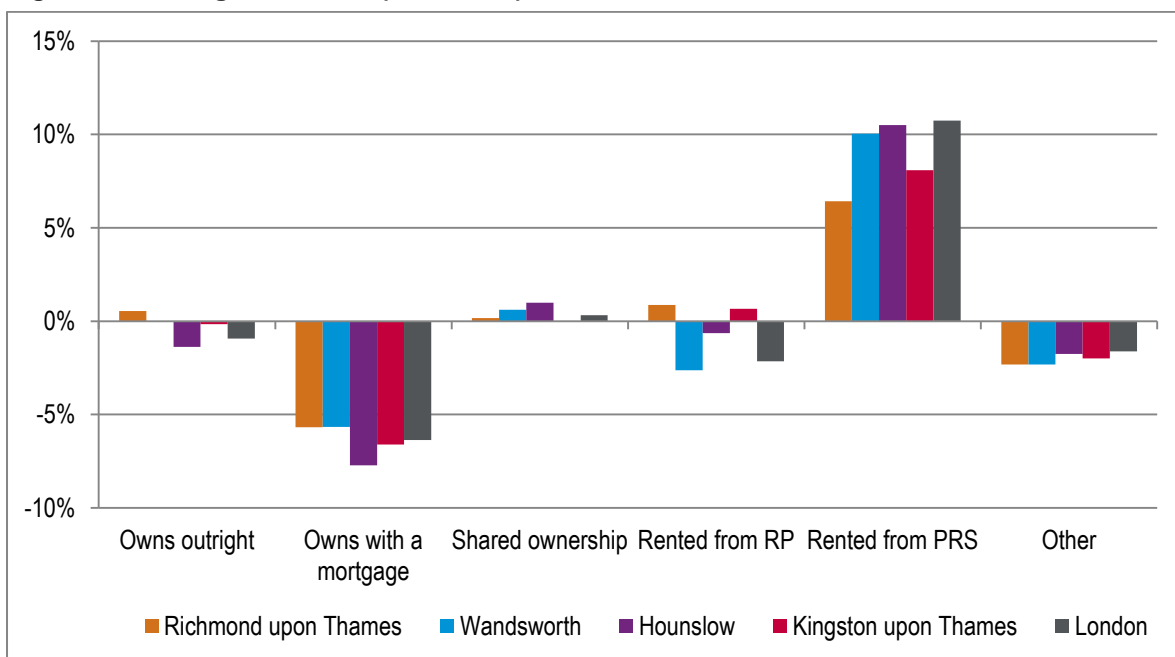
Figure 21: Tenure of All Households (2011)



Source: Census, 2011

- 4.28 The private rental sector equates to 21.8% of households which is lower than the other comparable Boroughs and London as a whole (25.1%); although this is still higher than the equivalent figure for England and Wales (16.7%).
- 4.29 The Private Rental Sector has also seen significant growth in the ten year period (2001-2011) however the growth in Richmond upon Thames is slightly smaller than all of the comparable areas. There has also been a commensurate reduction in the number of homes which own their home with a mortgage.
- 4.30 The shift away from owning with a mortgage towards the private rental sector is one seen nationally. Although in part this may reflect a conscious choice for some households, it is likely to be largely driven by affordability issues for younger households and post-recession restrictions to mortgage lending.

Figure 22: Change in Tenure (2001-2011)



Source: Census, 2011

Occupancy Rates

4.31 Across both the Borough and the wider comparators we have seen the proportion of residents living in over-occupied properties increase. Over-occupation is based on the number of rooms required for a given household against the number of rooms in their home. The requirement reflects ages of the household members and their relationships to each other. Where there are too few rooms this would be classed as overcrowding.

Table 13: Under and Over Occupancy (2011)

	Under-Occupied			Over-Occupied		
	2001	2011	Change	2001	2011	Change
Richmond upon Thames - No.	54,538	54,886	348	6,378	8,006	1,628
Richmond upon Thames - %	72%	69%	-2.9%	8%	10%	1.7%
Wandsworth	53%	49%	-3.7%	16%	20%	3.7%
Hounslow	57%	51%	-6.1%	16%	22%	5.6%
Kingston upon Thames	69%	65%	-3.5%	11%	13%	2.3%
London	57%	51%	-5.5%	17%	22%	4.3%
England and Wales	75%	73%	-2.0%	7%	9%	1.6%

Source: Census, 2011

4.32 The increase in overcrowding was particularly noticeable in Hounslow which grew from 16% in 2001 to 22% in 2011 (+5.6pp). By comparison the Richmond upon Thames figure increased only by

1.7pp and in England and Wales the increase was 1.6pp (see Table 13). In absolute terms the increase in the Borough was 1,600 households.

4.33 There are different measures of overcrowding (by bedroom standard) and the Council's Housing Strategy 2013-17 reported there has been a significant reduction in overcrowding in the borough since 2001, when 8.4% of households lacked at least one bedroom.

4.34 The number of properties that under occupied by their household is significantly larger (almost 7 times as many). In percentage terms the Borough (69%) has a much higher percentage of under-occupied properties than the local comparators. However the increase in these properties has only been very modest since 2001. Indeed as a percentage of the total stock the figure has actually decreased by around 3 percentage points.

Implications

- As illustrated in the previous section the borough population is growing, albeit at a slower rate than the neighbouring boroughs. The age profile of the Borough sees high levels of people in their thirties and early forties in comparison with the rest of London.
- The socio-economic profile of the Borough is generally one of affluence, with higher earnings, qualification and occupation levels than most of the comparable areas. The area sees high numbers of residents commuting out of the borough to highly paid jobs in the City and Westminster.
- The housing stock in the district is characterised by larger homes although there are a notable number of flats in the Borough which make up 40% of the stock. The Borough also sees a notable percentage of the homes in owner occupation. Private renting has grown between 2001-11, but at a lower rate than seen in other parts of London.

5 TREND BASED DEMOGRAPHIC PROJECTIONS

- 5.1 In this section consideration is given to demographic evidence of housing need and trend-based population and household projections. Population trends are interrogated, and projections both from ONS/ CLG and the GLA considered.
- 5.2 A degree of professional judgement is necessary in considering what might represent a reasonable and realistic projection for housing need, as highlighted in a 2015 High Court case⁸ where it is noted that *'this is a statistical exercise involving a range of relevant data for which there is no one set methodology, but which will involve elements of judgment about trends and the interpretation and application of the empirical material available'*.
- 5.3 The core projections in this section look at housing needs in the Borough over the period from 2014 to 2033. The end point is set to be consistent with the likely end date of the Local Plan Review; whilst the start date (2014) is the base date for the most up-to-date ONS/CLG/GLA projections (although it should be noted that ONS have subsequently published mid-year population estimates for 2015).
- 5.4 The central projection in the London SHMA 2013 indicated that London will require between approximately 49,000 (2015-2036) and 62,000 (2015-2026) more homes a year. However, estimates are at Greater London level only and not disaggregated to borough level. The 2015-2036 figure of 49,000 additional homes a year provided the basis for the detailed housing need figures set out in the London Plan, with a view to a full review of the Plan by 2019/20. The GLA have indicated their current expectation is household growth at similar levels to those set out in London Plan (40k/year), a population increase slightly lower (70k/year), but employment growth significantly higher (above 40k/year)⁹.
- 5.5 For clarity, this section considers six different projections drawing on both GLA and ONS/CLG data. The six projections can be summarised as:

⁸ *Kings Lynn & West Norfolk Council vs. Elm Park Holdings* [CO/914/2015]

⁹ GLA, https://www.london.gov.uk/sites/default/files/political_steering_group_notes_10_march_2016.pdf

Table 14: Overview of Projection Considered

Table 14: Overview of Projection Considered	
GLA Long-Term Trends	Linked to migration patterns over the 12-year period to 2014. GLA link population to households using the 2012-based CLG projections.
GLA Short-Term Trends	Linked to migration patterns over the five-year period to 2014. GLA link population to households using the 2012-based CLG projections.
GLA SHLAA Capped	Housing delivery and household growth take account of land supply information from the GLA 2013 Strategic Housing Land Availability Assessment (SHLAA). Projection allows population growth to be higher than would be suggested using CLG household representative rates.
GLA SHLAA CLG	Housing delivery and household growth take account of land supply information from the GLA 2013 Strategic Housing Land Availability Assessment. Projection takes household representative rates from the CLG (2012-based) household projections.
ONS 2014-based SNPP	Based on the latest official population and household projections issued by ONS and CLG respectively. These are 2014-based. ONS projections which consider international migration trends in the 2008-14 period and internal (domestic) migration over the 2009-14 period
ONS 2014-based (+MYE)	This uses the assumptions in the SNPP for birth/death rates and migration levels but updates the baseline population (in 2015) to that shown by ONS mid-year population estimates.

5.6 In deriving conclusions on the ‘unconstrained’ housing need (OAN), the trend-based and ONS projections are relevant. However, given the historic and continued constrained land supply within the Borough, the GLA projections which take account of land availability data from the SHLAA are arguably more realistic in estimating future population/ household growth. Both are therefore considered herein.

Interrogating Past Demographic Trends

Overall Population Growth

- 5.7 The population of the Richmond in 2014 was estimated to be 193,600. This is an increase of 19,300 people since 2001 – an 11% increase over the 13-year period. This level of population growth is notably lower than seen across either Outer London or London as a whole, but is slightly higher than population growth seen nationally. Again this reflects the pre-plan period level of growth.

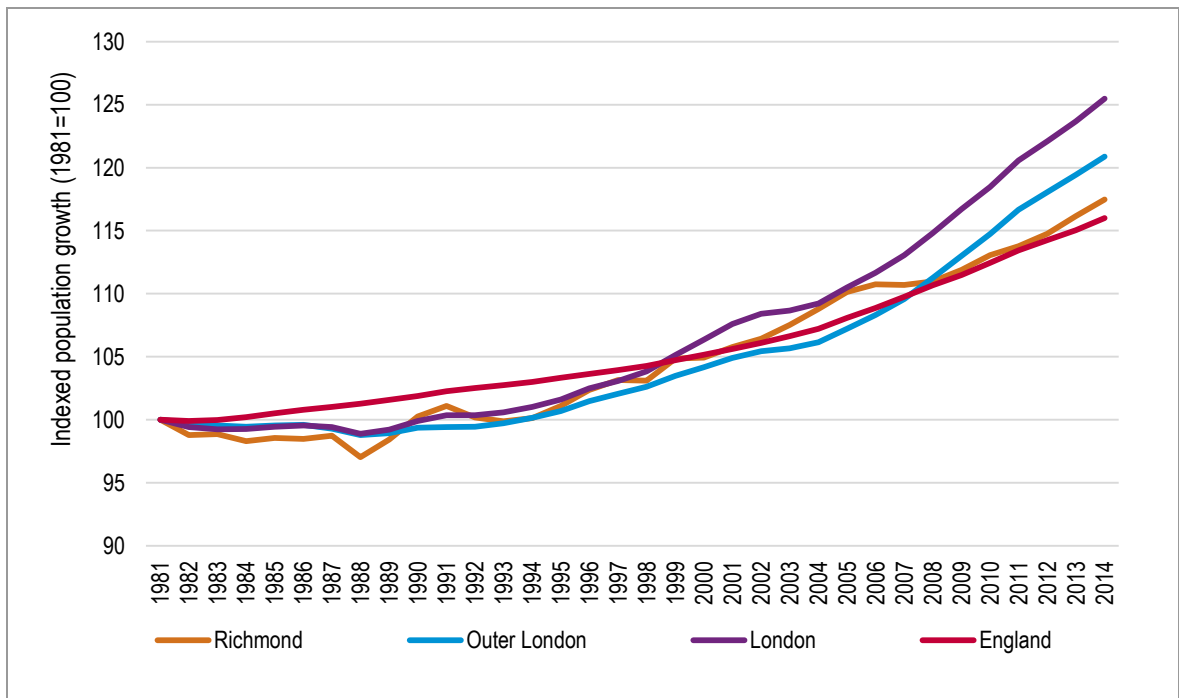
Table 15: Population Growth (2001-14)

Area	Population 2001	Population 2014	Change in Population	% change
Richmond	174,311	193,585	19,274	11.1%
Outer London	4,463,028	5,143,034	680,006	15.2%
London	7,322,403	8,538,689	1,216,286	16.6%
England	49,449,746	54,316,618	4,866,872	9.8%

Source: ONS Mid-Year Population Estimates

- 5.8 Looking over the longer-term, the Borough's population was relatively static between 1981-1993, grew modestly over the subsequent period to 2007, with stronger growth seen thereafter. This broad profile is relatively consistent with that seen across Outer London and London as a whole. However, population growth in LB Richmond has been more modest than that seen across London since 1998, and has not seen the acceleration in rates of population growth which have been seen in London (and across England albeit to a lesser rate) since 2004. Against this stronger regional and national growth, it is however realistic that growth/ demand pressures in the Borough will be more akin to those seen over the last 5 or 10 years than those seen looking back to 1981 overall.
- 5.9 The analysis above is based on ONS data and it is useful to also consider the GLA view about how population has changed. From the latest GLA projections it is possible to extract a time-series of data back to 2001. Figure 23 shows that from 2001 to 2014 the level of population growth estimated by both of these sources is virtually identical although the trajectory of growth is slightly different.

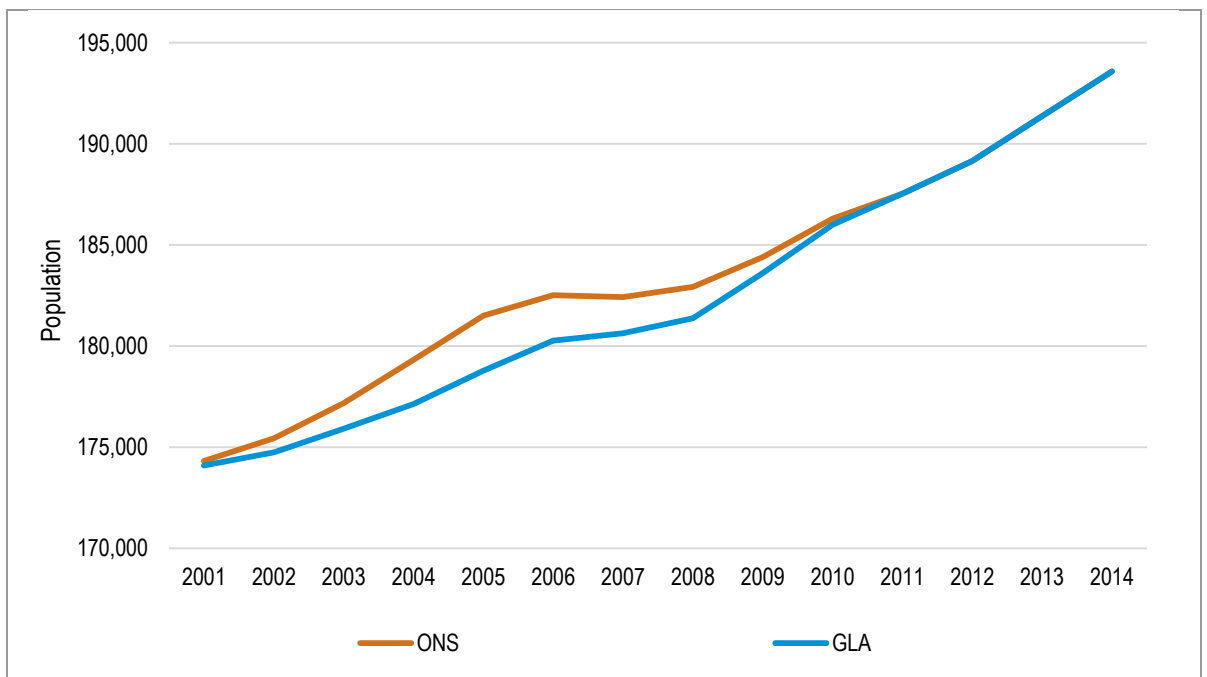
Figure 23: Indexed Population Growth, 1981-2014



Source: ONS Mid-Year Population Estimates

5.10 Good quality data on population change (and the components thereof) is principally available from 2001 onwards.

Figure 24: Past Population Growth – ONS and GLA Data

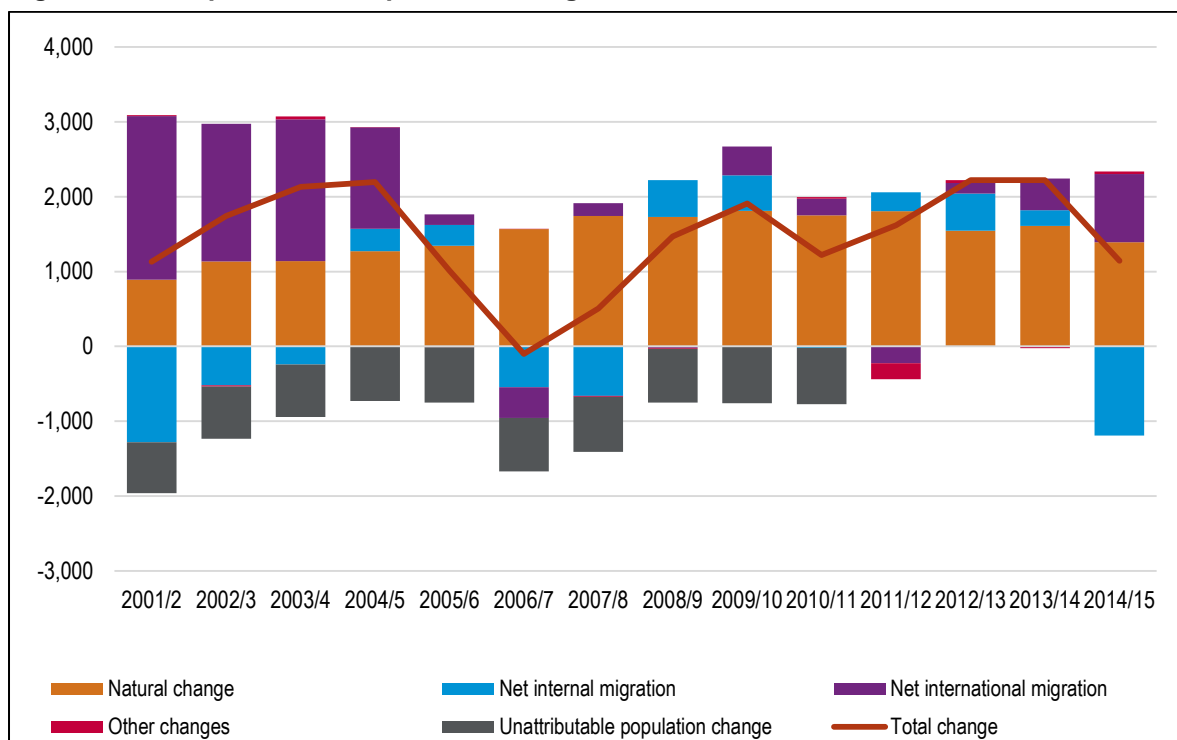


Source: ONS Mid-Year Population Estimates

Components of Population Change

- 5.11 Figure 25 and Table 16 below consider the drivers of population change in LB Richmond, using ONS data. Population change is largely driven by natural change (births minus deaths) and migration although within ONS data there is also a small other changes category (mainly related to armed forces and prison populations) and an Unattributable Population Change (UPC) category.
- 5.12 UPC is an adjustment made by ONS to mid-year population estimates where Census data has suggested that population growth had either been over- or under-estimated in the inter-Census years. Because UPC links back to Census data a figure is only provided for 2001 to 2011.
- 5.13 Natural change is a strong driver of population growth in the Borough. This is function in part of the age structure, with a high proportion of women of childbearing age resident. Set against this, levels of migration are relatively modest. International migration was significant between 2001-4, but figures since have been modest. Internal migration was negative (net out-migration) in five of the seven years between 2001-7 (which is fairly common for urban authorities with a younger population). It has however been positive in five of the last 6 years.
- 5.14 The number of births has typically exceeded the number of deaths by around 1,500 per annum over the period from 2001. The level of natural change has generally been increasing over time although the more recent evidence suggests that this trend may now be levelling off or declining slightly.
- 5.15 Over the 13-year period to 2014, the data shows an average level of net migration of about 563 people per annum on average (with about 623 of this being international migration and a level of net internal out-migration of about 60 people per annum).
- 5.16 Other changes are quite small although the data shows a notable (negative) level of UPC. This could suggest that the 2011 Census undercounted the population, or (more likely) that ONS over-estimated migration to the Borough between 2001-11. Given the strong levels of international migration between 2001-5, and recognising that international migration is the most difficult component of population change to accurately estimate, it is most likely that international migration during this period in particular could have been over-estimated. The 'attribution' of UPC to years between 2001-11 in the ONS data (as shown in the chart) is arbitrary.
- 5.17 The analysis below also shows data for 2014/15 (which is the year after the start date of the projections in this section). The extra year shows a notably lower level of net migration (particularly internal migration) than most previous years.

Figure 25: Components of Population Change, mid-2001 to mid-2015 – Richmond



Source: ONS

Table 16: Components of Population Change, LB Richmond 2001-15 – ONS Estimates

Year	Natural change	Net internal migration	Net international migration	Other changes	Other (Un-Attributable)	Total change
2001/2	891	-1,283	2,185	16	-679	1,130
2002/3	1,137	-518	1,838	-19	-697	1,741
2003/4	1,140	-240	1,894	41	-705	2,130
2004/5	1,272	300	1,354	1	-731	2,196
2005/6	1,344	278	141	-11	-740	1,012
2006/7	1,569	-546	-412	4	-714	-99
2007/8	1,743	-663	172	-10	-736	506
2008/9	1,731	489	-21	-12	-720	1,467
2009/10	1,813	471	387	-7	-754	1,910
2010/11	1,750	-21	223	24	-753	1,223
2011/12	1,806	252	-226	-214	0	1,618
2012/13	1,548	496	139	37	0	2,220
2013/14	1,610	208	426	-24	0	2,220
2014/15	1,391	-1,192	913	33	0	1,145

Source: ONS

5.18 As with population growth, the GLA also provide estimates of the components of population change. The GLA data provides estimates of natural change and net migration as well as overall population growth. This allows for a calculation of ‘other’ changes. The table below shows the GLA

components of change from 2001 to 2014. The data shows the same natural change data as with ONS, but some substantially different figures for net migration (particularly international migration). The differences for international migration are largely linked to the GLA view that most (or all) of the UPC can be attributed to international migration.

5.19 The GLA analysis overall suggests net migration averaging 26 people per annum in the 2001-14 period; this compares with 563 per annum for the same period in the ONS Components of Change (although the ONS data does not make any adjustment for UPC). The difference principally relates to the treatment of UPC.

Table 17: Components of Population Change, LB Richmond 2001-14 – GLA Estimates

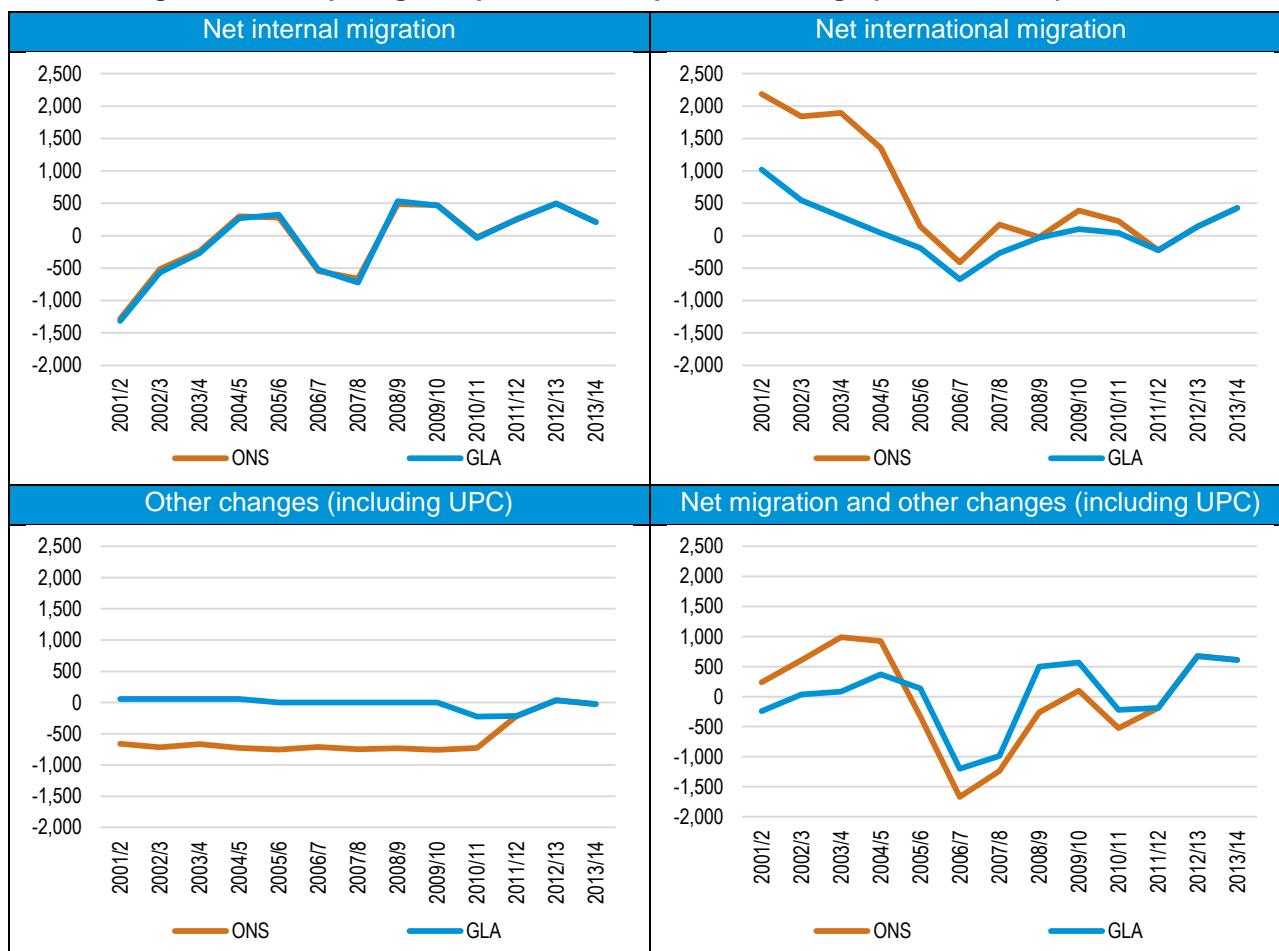
Year	Natural change	Net internal migration	Net international migration	Other changes (implied)	Total change
2001/2	891	-1,316	1,018	57	650
2002/3	1,137	-568	546	57	1,172
2003/4	1,140	-270	295	57	1,222
2004/5	1,272	270	44	57	1,642
2005/6	1,344	325	-188	0	1,481
2006/7	1,569	-527	-674	0	368
2007/8	1,743	-723	-267	0	753
2008/9	1,731	531	-30	0	2,232
2009/10	1,813	469	101	0	2,383
2010/11	1,751	-35	42	-228	1,530
2011/12	1,806	253	-226	-215	1,618
2012/13	1,548	496	139	37	2,220
2013/14	1,610	208	426	-24	2,220

Source: GLA

5.20 The figures below (Figure 26) compare the key components of change from each of the ONS and GLA data. The figure looks separately at internal migration, international migration and other changes. The final chart (bottom right) shows a combined measure which adds together all net migration and other changes (including UPC).

5.21 The analysis shows that there is little difference between ONS and CLG in terms of internal migration. There are however substantial differences when considering both international migration and other changes. However, when these are combined (along with the internal migration figures) there is a closer agreement between the sources.

Figure 26: Comparing Components of Population Change (ONS and GLA)



Source: ONS and CLG

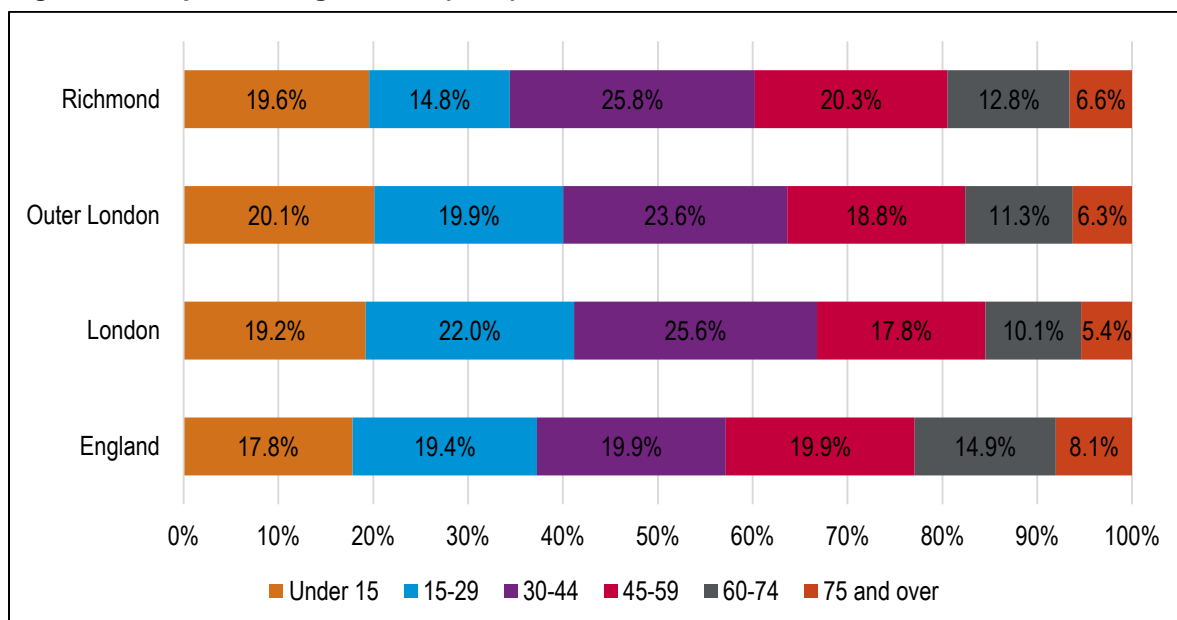
Age Profile and Past Changes

5.22 The age profile of the population of LB Richmond is slightly different to that seen in other areas (as explored in Section 3 and summarised in Figure 27). Compared with London and Outer London, the Borough has a relatively old population with 19% of the population aged 60 and over (compared with 18% in Outer London and 15% across the whole of London).

5.23 However, when compared with the national position, the proportion of people aged 60 and over is quite low (23% of the population nationally is aged 60 and over). The Borough sees a low proportion of people aged 15-29 and a fairly average proportion of children (people aged under 15). As a result, the proportion of people aged 30-59 is relatively high; accounting for 46% of the population, higher than seen in any of Outer London (42%), London (43%) or nationally (40%). As set out in the previous section, the proportion of people in their late 30s and 40s is particularly

above average. The largest age groups overall are of those in their 30s and 40s, many of which have young children.

Figure 27: Population Age Profile (2014)



Source: ONS 2014 Mid-Year Population Estimates

5.24 The table below shows how the age structure of the population has changed over the 2001 to 2014 period (again from the ONS data). The data shows the most significant growth to have been in the Under 15 age group, although the 60-74 age group saw the highest proportionate increase. Increases have also been seen in most other age groups, although the proportion of people aged 15-29 has declined by about 9% over the 13-year period studied. The change in the population aged 75 and over is very modest (at just 3%).

Table 18: Change in Age Structure 2001 to 2014 – LB Richmond

Age group	2001	2014	Change	% change
Under 15	30,874	37,894	7,020	22.7%
15-29	31,437	28,679	-2,758	-8.8%
30-44	48,075	50,018	1,943	4.0%
45-59	33,516	39,348	5,832	17.4%
60-74	18,041	24,866	6,825	37.8%
75 and over	12,368	12,780	412	3.3%
Total	174,311	193,585	19,274	11.1%

Source: ONS Mid-Year Population Estimates (2001 and 2014)

5.25 The same analysis has been carried out for a range of comparator areas. Population profile changes in Richmond are somewhat different to that seen in other areas – in particular the Borough has seen greater increases in the proportion of people aged 60-74 and typically smaller increases

(and some decreases) in the population aged 15-59. The proportion of children living in the Borough has seen more substantial growth than in other areas (in particular when compared with the national position).

- 5.26 The population change evidence would point in particular to demand from families for housing in the Borough.

Table 19: Changes in Age Structure, 2001 to 2014

Age group	Richmond	Outer London	London	England
Under 15	22.7%	21.0%	19.9%	4.2%
15-29	-8.8%	9.7%	10.5%	12.9%
30-44	4.0%	9.2%	14.3%	-4.0%
45-59	17.4%	25.6%	30.2%	16.0%
60-74	37.8%	16.2%	14.3%	24.1%
75 and over	3.3%	10.0%	7.6%	17.5%
Total	11.1%	15.2%	16.6%	9.8%

Source: ONS Mid-Year Population Estimates (2001 and 2014)

- 5.27 GLA data about age structure changes typically shows the same pattern as the ONS data (as can be seen in the table below).

Table 20: Change in age structure LB Richmond 2001-14 (GLA data)

Age group	2001	2013	Change	% change
Under 15	30,644	37,894	7,250	23.7%
15-29	31,175	28,679	-2,496	-8.0%
30-44	48,377	50,018	1,641	3.4%
45-59	33,502	39,348	5,846	17.4%
60-74	18,033	24,866	6,833	37.9%
75 and over	12,362	12,780	418	3.4%
Total	174,093	193,585	19,492	11.2%

Source: GLA

Demographic Evidence of Housing Need

- 5.28 Planning Practice Guidance outlines that *'household projections published by the Department for Communities and Local Government should provide the starting point estimate of overall housing need. The household projections are produced by applying projected household representative rates to the population projections published by the Office for National Statistics. Projected household representative rates are based on trends observed in Census and Labour Force Survey data.'*

- 5.29 The most up-to-date projections are the 2014-based CLG Household Projections published in July 2016. These projections were underpinned by ONS (2014-based) Subnational Population Projections (SNPP) – published in May 2016.
- 5.30 Table 21 below sets out levels of household growth expected by the CLG Household Projections in the 2014-33 period. Data is also provided for Outer London, London and England for comparative purposes.
- 5.31 Across the Borough, the CLG Household Projections show household growth of about 22,700 – this is a 27% increase; below equivalent figures for both Outer London (31%) and London as a whole (32%). The projected change in households in the Borough is however notably above the proportion projected nationally (18%).

Table 21: Household change 2014 to 2033 (2014-based CLG Household Projections)

Area	Households 2014	Households 2033	Change in households	% change
Richmond	82,641	105,333	22,692	27.5%
Outer London	1,999,255	2,628,430	629,175	31.5%
London	3,452,057	4,547,041	1,094,984	31.7%
England	22,746,487	26,897,561	4,151,074	18.2%

Source: CLG household projections

- 5.32 Whilst the 2014-based SNPP is the latest ‘official’ population projection, it is worth testing the assumptions underpinning the projection to see if it broadly reasonable in the local context. Our analysis also considers the GLA 2015 round of demographic projections.

2012-based Subnational Population Projections (SNPP)

- 5.33 The latest SNPP were published by ONS on the 25th May 2016. They replace the 2012-based projections. Subnational population projections provide estimates of the future population of local authorities, assuming a continuation of recent local trends in fertility, mortality and migration which are constrained to the assumptions made for the 2014-based national population projections. The 2014-based SNPP are largely based on trends in the 2009-14 period (2008-14 for international migration trends). The SNPP are only population projections and do not contain headship rates (which are needed to convert into household estimates).
- 5.34 The SNPP are not forecasts and do not attempt to predict the impact that future government or local policies, changing economic circumstances or other factors might have on demographic behaviour. The primary purpose of the subnational projections is to provide an estimate of the

future size and age structure of the population of local authorities in England. These are used as a common framework for informing local-level policy and planning in a number of different fields as they are produced in a consistent way. These are trend-based projections and do not take account of land supply.

5.35 Table 22 below shows projected population growth from 2014 to 2033 in the Borough and a range of other areas. The data shows that the population of LB Richmond is projected to grow by around 43,900 people; this is a 23% increase – substantially above that projected for England and in line with equivalent figures for Outer London and London as a whole.

Table 22: Projected Population Growth (2014-2033) – 2014-based SNPP

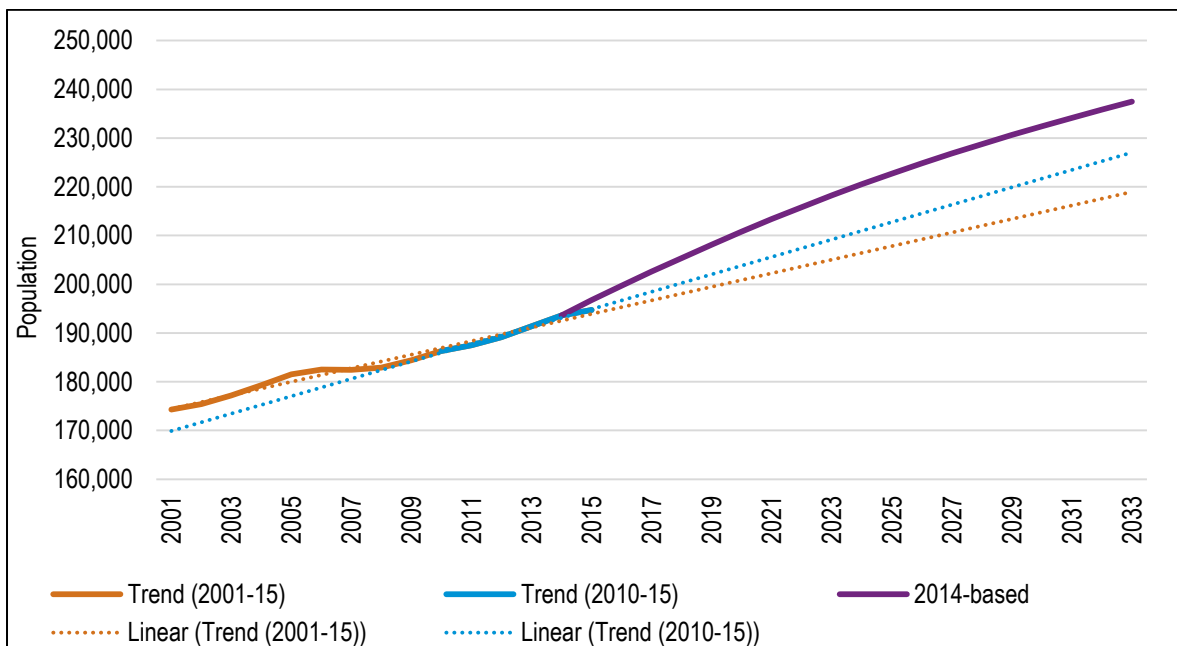
	Population 2014	Population 2033	Change in population	% change
Richmond	193,585	237,499	43,914	22.7%
Outer London	5,143,034	6,314,521	1,171,487	22.8%
London	8,538,689	10,495,108	1,956,419	22.9%
England	54,316,618	61,490,636	7,174,018	13.2%

Source: ONS

5.36 Figure 28 below shows past and projected population growth in the period 2001 to 2033. The data also plots a linear trend line for the last five years for which data is available (2010-15) and also a longer-term period from 2001 to 2015 – this being the longest period for which reasonable data about the components of population change (e.g. migration) is available.

5.37 The data shows that the population is expected to grow in the SNPP at a rate which is some way above past trends; regardless of whether comparing with long- or short-term data. There is however a closer relationship with short-term trends than those seen back to 2001. ONS typically consider short-term trends when developing the SNPP (looking at the last 5-years for internal migration and the last 6-years for international migration) and this is thus reflected in the trend.

Figure 28: Past and Projected Population Growth – LB Richmond



Source: ONS

Alternative Demographic Scenarios

- 5.38 Whilst the SNPP are the latest official (national) projections, it is appropriate to consider alternative demographic scenarios, including those developed by the GLA. These other scenarios considered are as listed in Table 14.
- 5.39 The first four projections are taken directly from the GLA (2015-round) Demographic Projections, which have a 2014 base. The latter two use the assumptions underpinning the 2014-based SNPP but with the second projection rebasing this to take account of 2015 Mid-Year Population Estimates (as it is not necessary to project population between 2014-15). The core assumptions about birth/death rates and migration profiles have not been changed but a different age structure in 2015 to that projected in the 2014-based projections does mean that the figures can be different moving forward.
- 5.40 The table below shows the projected change in population under each of the different scenarios. The trend-based GLA Projections show lower population growth than the SNPP. Given a continued constrained land supply, the projections linked to housing land availability showing significantly lower levels of population growth (negative population growth with the ‘CLG’ scenario).

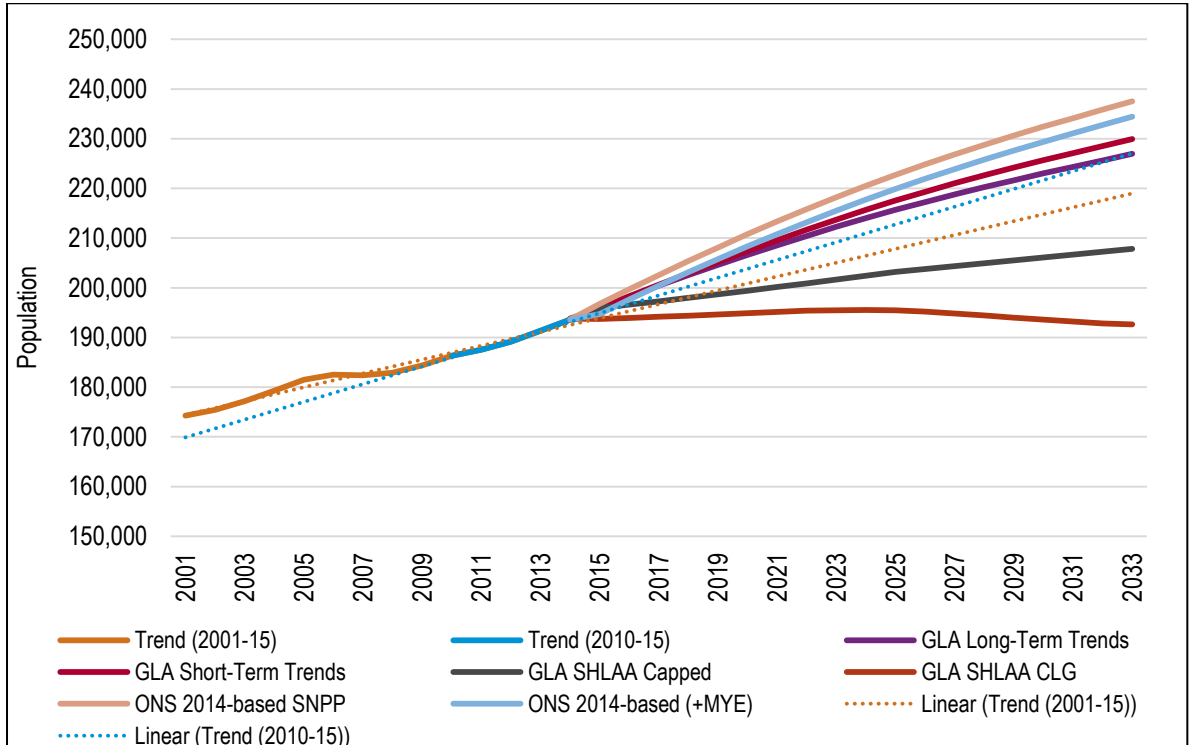
Table 23: Projected Population Growth (2014-2033) – Alternative Scenarios – LB Richmond

	Population 2014	Population 2033	Change in population	% change
GLA Long-Term Trends	193,585	226,950	33,365	17.2%
GLA Short-Term Trends	193,585	229,941	36,356	18.8%
GLA SHLAA Capped	193,792	207,856	14,063	7.3%
GLA SHLAA CLG	193,792	192,608	-1,185	-0.6%
ONS 2014-based SNPP	193,585	237,499	43,914	22.7%
ONS 2014-based (+MYE)	193,585	234,417	40,832	21.1%

Source: Demographic Projections

5.41 Figure 29 below shows population growth under each of the above scenarios and how this compares with past trends (past trend data being drawn from ONS mid-year population estimates). All of the trend-based projections show population growth above the long-term trend and only one projection (GLA – Long-Term) has a population by 2033 which is below even the short-term trend. The SHLAA based Projections both show population growth that is significantly below past trends (regardless of the trend period studied). All of the demographic projections show stronger growth earlier in the projection period.

Figure 29: Past and Projected Population Growth – LB Richmond



Source: ONS

Which Scenarios are potentially the most robust?

- 5.42 The analysis above indicates that there are a range of different projections which give different estimates of future population growth varying from -1% to 23% over the 2014-33 period. The level of variance is wide.
- 5.43 It is clear that many of the trend-based projections show future population growth to be above past trends – the only exception to this being the GLA – Long-Term Projection. In the absence of land supply constraints, population growth in the Borough would potentially be of between 17-23% over the period to 2033. The short-term projections, based on GLA’s analysis, are potentially influenced by the recent economic recession – which saw stronger population growth in London (and other cities) and less out-migration from cities to surrounding areas, linked in part of housing market conditions. GLA’s conclusions in the 2013 London Strategic Housing Market Assessment is that it would be reasonable to expect net internal out-migration from London to increase as we move away from the recession. This seems to be a reasonable conclusion – and would lend weight to the use of the GLA Long-Term Projection as a reasonable trend-based projection to use as the starting point for considering OAN in the absence of development constraints.
- 5.44 However, the reality is that land supply in the Borough will continue to be constrained, and therefore the SHLAA-related projections are also a realistic assessment of the likely demographic change. In the case of the SHLAA Projections it is notable that these show a different level of population growth even though they are linked to a consistent level of housing delivery. Although not presented in this report, we have run a scenario which seeks to match the levels of housing delivery suggested by the GLA. Our own projection indicates a modest decline in population. On this basis it is considered that the SHLAA scenario with the lowest population growth is probably the most robust. The expectation that migration dynamics will return towards long-term trends supports this.
- 5.45 Therefore, the analysis concludes that there are two main scenarios which can be considered as the most robust for LB Richmond. These are:
- Unconstrained – GLA Long-Term Projection
 - Taking account of Constraints – GLA SHLAA CLG Projection.

Age Structure Changes

- 5.46 With growth in the population will also come age structure changes. The table below summarise the findings for key (15-year) age groups under the GLA Long-Term Projection. The data shows that largest growth will be in people aged 45-59 with the highest proportionate growth in the 75+ age group. The analysis also identifies strong growth in the 60-74 age group and fairly modest changes to the population aged under 45.

Table 24: Population change 2014 to 2033 by fifteen-year age bands (GLA (long-term)) – Richmond

Age group	Population 2014	Population 2033	Change in population	% change from 2014
Under 15	37,894	39,731	1,837	4.8%
15-29	28,679	34,976	6,297	22.0%
30-44	50,018	51,371	1,353	2.7%
45-59	39,348	46,439	7,091	18.0%
60-74	24,866	33,311	8,445	34.0%
75+	12,780	21,122	8,342	65.3%
Total	193,585	226,950	33,365	17.2%

Source: GLA

- 5.47 A similar analysis has been carried out using data from the SHLAA (CLG) Projection from the GLA. This shows a similar pattern of change although due to the much lower level of population growth, the age specific increases are much smaller (and indeed negative for age groups up to age 44).

Table 25: Population change 2014 to 2033 by fifteen-year age bands (GLA (SHLAA – CLG)) – Richmond

Age group	Population 2014	Population 2033	Change in population	% change from 2014
Under 15	37,467	33,522	-3,945	-10.5%
15-29	29,732	27,240	-2,492	-8.4%
30-44	50,575	42,484	-8,091	-16.0%
45-59	38,898	40,883	1,986	5.1%
60-74	24,276	28,844	4,567	18.8%
75+	12,845	19,635	6,791	52.9%
Total	193,792	192,608	-1,185	-0.6%

Source: GLA

- 5.48 These changes in the population result from a situation whereby land supply is constrained which inhibits the ability of younger households to move into the Borough; but older age groups with housing wealth remain resident.

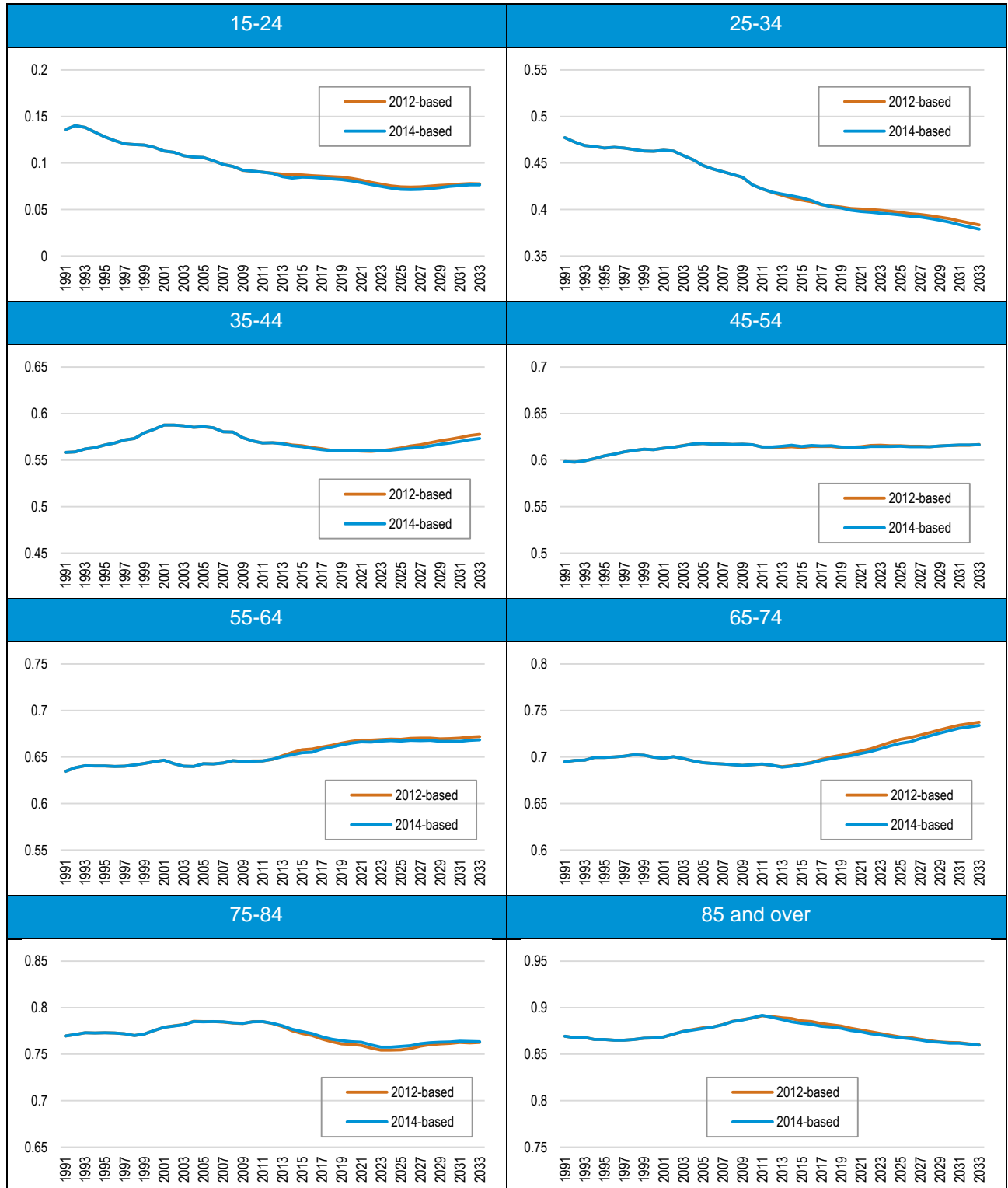
Household Formation Rates and Household Growth

- 5.49 Having examined the anticipated growth in the population of Richmond and the age/sex profile of the population, the next step in the process for considering housing need is to convert this information into estimates of the number of households in the area. To do this the concept of

headship rates is used. Headship rates can be described in their most simple terms as the number of people who are counted as heads of households (or in this case the more widely used Household Reference Person (HRP)).

- 5.50 On the 12th June 2016, CLG published a new set of (2014-based) household projections – the projections contain two core analyses. The Stage 1 household projections project HRRs based on data from the 1971, 1981, 1991, 2001 and 2011 Censuses with outputs for age, sex and marital status. For younger age groups greater weight was given in the CLG projections methodology to the dampened logistical trend than the simple logistics trend; the effect of which is to give greater weight to the shorter-term trends.
- 5.51 The Stage 2 household projections consider household types and the methodology report accompanying the projections is clear that these projections are based on just two data points – from the 2001 and 2011 Census. Overall outputs on total household growth are constrained to the totals from the Stage 1 Projections. This means that both sets of projections show the same level of overall household growth (when set against the last set of SNPP) but some of the age specific assumptions differ. Differences can however occur between the Stage 1 and 2 HRRs when modelled against different population projections (due to differences in the age structure).
- 5.52 Overall, it is considered that the Stage 1 projections should be favoured over the Stage 2 figures for the purposes of considering overall household growth; this is for two key reasons: a) the Stage 1 figures are based on a long-term time series (dating back to 1971 and using 5 Census data points) whereas the Stage 2 figures only look at two data points (2001 and 2011) and b) the Stage 2 figures are constrained back to Stage 1 values, essentially meaning that it is the Stage 1 figures that drive overall estimates of household growth in the CLG household projections themselves. The analysis to follow therefore focuses on Stage 1 figures.
- 5.53 The figure below shows how Stage 1 figures differ for different age groups, with a comparison with the previous (2012-based) version also shown.
- 5.54 It is notable that the 25-34 and 35-44 age groups show a notable decrease in the headship rate from 2001 to 2011 – this would suggest that there may have been some degree of suppression of household formation in this period; although this is not clear cut as the headship rates can also be influenced by other factors such as international migration and growth in BME communities (which have different household structures). Moving forward from 2011 the projections are expecting some further decrease in the headship rate (in the 25-34 age group and in the 35-44 age group up until about 2021); this suggests that there may be some additional suppression being built into the projections.

Figure 30: Projected Household Representative Rates by Age of Head of Household – LB Richmond



Source: Derived from CLG data

5.55 Whilst some improvements to the formation rates of the younger population could be projected, it does seem unlikely given the land constraints in the Borough (and London more widely) that increases in the formation rates of these groups is a realistic outcome. Planning Practice Guidance emphasises the need for realism in assessments of housing need.

Housing Need (using 2014-based Headship Rates)

5.56 Table 26 below brings together outputs in terms of household growth and housing need using the 2014-based headship rates and the full range of population growth scenarios developed (those marked in bold represent the scenarios considered to be the most robust). To convert households into dwellings the data includes an uplift to take account of vacant homes. Analysis of 2011 Census data about unoccupied household spaces (Table: QS417EW) suggests a vacancy rate of 3.7% which has been used in analysis. It is assumed that such a level of vacant homes will allow for movement within the housing stock – it takes account of frictional vacancy and some vacant housing which is undergoing repair, extension or modernisation.

5.57 The analysis shows an overall housing need for 1,047 dwellings per annum across the Richmond area when using the GLA Long-Term Population Projection. This figure reduces substantially to 281 per annum when linking figures to the SHLAA (capped).

Table 26: Projected housing need – range of demographic based scenarios and 2014-based headship rates – Richmond

	Households 2014	Households 2033	Change in households	Per annum	Dwellings (per annum)
GLA Long-Term Trends	82,669	101,851	19,182	1,010	1,047
GLA Short-Term Trends	82,669	103,756	21,088	1,110	1,151
GLA SHLAA Capped	83,048	94,682	11,634	612	635
GLA SHLAA CLG	83,051	88,201	5,150	271	281
ONS 2014-based SNPP	82,640	105,330	22,690	1,194	1,239
ONS 2014-based (+MYE)	82,640	104,427	21,787	1,147	1,190

Source: Demographic Projections

Trend based Demographic Projections: Implications

- The population of Richmond has grown quite rapidly over the past decade or so (increasing by 19,300 people from 2001 to 2014). The rate of growth is however below that seen in Outer London and London. Moving forward, a range of demographic based projections (both from ONS and the GLA) indicate a continuation of the past trends. However, a much more modest future growth is projected (a small population decline) using the most reliable of the SHLAA related projections from GLA. This compares with population growth of at least 33,400 from the range of trend-based scenarios analysed, and reflects a continued constrained land supply.
- As with many areas, the population is expected to age over time, with particularly strong increases in the population aged 75 and over – projected ‘ageing’ is particularly noticeable where population projections are lower (i.e. in the case of the GLA SHLAA-based projections) as housing supply inhibits in-migration of younger age groups. This projection expects to see population decline in age groups up to age 44.
- Overall, taking account of the range of evidence available it is considered that the most reliable projections to use in analysis are the GLA 12-year migration trends (when studying trend-based population growth) in studying OAN and the GLA SHLAA (capped) in considering what in reality is more likely to occur. Alternative projections from both the GLA and ONS have been considered but are not thought to be as robust as the GLA ones which use longer-term migration data.
- When taken as a whole, the household representative rates in the 2014-based household projections (from CLG) appear reasonable. **Once applying the 2014-based household projections to the population projections (and including a vacancy allowance) it is concluded that the (unconstrained) demographic-based need for housing in the Borough is for around 1,050 dwellings per annum in the 2014-33 period – linked to the GLA 12-year migration projection.**
- This is at the bottom end of the range identified by the demographic projections but is consistent with past trends in population growth. Evidently taking account of land supply, expected growth will be lower, which could result in a stronger relative ageing of the population in the Borough.

6 INTERACTION WITH ECONOMIC PERFORMANCE

6.1 In this section, we move on to consider the interaction between demographic and economic growth.

6.2 Planning Practice Guidance sets out that consideration should be given to future economic performance in drawing conclusions on the overall need for housing (leaving aside constraints). Where the evidence suggests that higher migration might be needed than seen in past trends in order to support economic growth, consideration should be given to adjusting the spatial distribution of housing. Specifically, the Guidance outlines that:

'Plan makers should make an assessment of the likely growth in job numbers based on past trends and/or economic forecasts as appropriate and also having regard to the growth of the working age population'

'Where the supply of working age population that is economically active (labour force supply) is less than the projected job growth, this could result in unsustainable commuting patterns (depending on public transport accessibility or other sustainable options such as walking or cycling) and could reduce the resilience of local businesses. In such circumstances, plan makers will need to consider how the location of new housing or infrastructure development could help address these problems'

6.3 This balancing exercise – considering the interaction between workforce and employment growth – is expected to be undertaken at a housing market area level. National policy does not really envisage that this balancing exercise will be undertaken for individual local authorities within a wider HMA (albeit that case law draws in some instances different conclusions – see for instance *Oadby & Wigston BC vs. SSCLG*).

6.4 The London labour market clearly operates across local authority boundaries, and indeed across the boundary between London and the Home Counties. The London Borough of Richmond sits across two wider Travel to Work Areas (as shown in Section 3). In this context any attempt to match jobs and homes within an individual borough is potentially a somewhat theoretical exercise. This chapter should therefore be considered as providing an indicative analysis of what level of housing need might in theory arise should balance growth in jobs and homes in the Borough be sought.

6.5 It may also be relevant to note that the Local Plan Expert Group proposes to Government a key major change in approach, recommending the removal of the requirement to consider the alignment of housing need and economic forecasts in deriving conclusions on housing need. This is in recognition of the fact that this has been one of “*the single most difficult and disputed steps in the current methodology*” and that employment growth pressure is also likely to be obvious in local affordability issues. On that basis, the Local Plan Expert Group’s report proposes that adjustments to support employment growth would not form part of the OAN assessment, but instead provides

flexibility so that authorities could choose to justify a higher housing requirement to align with policy aspirations. However, at the time of writing, the existing PPG guidance applies.

Economic Forecasts

- 6.6 The latest econometric forecast for future economic performance is from Experian. This considers the number of additional jobs that might be created in the Borough based on a ‘business as usual’ approach. These have been compared against the GLA’s latest employment projections set out in GLA Economics *Working Paper 67*¹⁰ and tested quantitatively alongside other evidence and through engagement with the Council’s Economic Development Team.
- 6.7 The Experian forecast essentially considers how the national and regional economy might perform before considering the local situation. At the local level consideration is given to past job growth as well as an understanding of how different sectors have performed; this is used to predict what might happen in the future. The forecasts do not take account of policy influences, or land supply – and there is clearly some potential that for instance loss of office floorspace could constrain future economic growth.
- 6.8 Economic forecasts need to be treated with some degree of caution; they often show widely different outputs depending on the time of the forecast and the forecasting house. Additionally, they can be influenced by past trend ‘shocks’ (e.g. where an area has seen strong growth in the past, it is generally assumed that this will continue in the future; in reality it may be that high past trends are influenced by individual schemes that are not likely to be repeated).
- 6.9 The table below shows the estimated number of jobs forecast to be provided in the 2014-33 period based on the Experian forecasts. It should be noted that the forecast only ran to 2031 and so data to 2033 has been extrapolated based on figures for the last two years for which data is provided (2029-31). The data shows a forecast increase of 14,500 jobs over the 2014-33 period, a 16% increase – this is equivalent to about 760 additional jobs per annum.

Table 27: Job growth per annum (2014-33) – Experian

	Jobs (2014)	Jobs (2033)	Change in jobs	% change from 2014
Experian	90,700	105,200	14,500	16.0%

Source: Experian

- 6.10 GLA Economics Working Paper 67 provides an alternative set of borough-based projections for employment growth, based on projecting forwards separately trends in employee jobs and self-

¹⁰ GLA Economics (2015) *Updated employment projections for London by sector and trend-based projections by borough*

employment. These expect Richmond Borough's economy to grow by 0.8% per annum, which is modestly above the growth rate (of 0.7% pa) expected across London over the 2014-36 period but below the 1.0% pa growth achieved between 2000-14. This is reasonable set against weaker expected global growth, and the influence of constrained public spending – and consistent with most forecasters' views that future growth will be slower than over the 2000-14 period. The GLA projections expect on this basis 790 additional jobs per annum in LB Richmond.

- 6.11 Consideration is given in this section to what impact this level of economic growth could have in theory on housing need; but also following on from this to what other local-based factors, including a constrained supply of land and premises, might have on future economic performance.

Considering Potential Labour Demand

- 6.12 Linking economic performance to housing need is inherently complex and should be treated with extreme caution.
- 6.13 The analysis above has set out a range of potential scenarios for changes in the number of jobs in the Borough. However, for the purposes of analysis linked to demographic data it is necessary to convert this into estimates of the required change to the economically active population. The number of jobs and resident workers required to support these jobs will differ depending on two main factors:
- Commuting patterns – where an area sees more people out-commute for work than in-commute it may be the case that a higher level of increase in the economically active population would be required to provide a sufficient workforce for a given number of jobs (and vice versa where there is net in-commuting); and
 - Double jobbing – some people hold down more than one job and therefore the number of workers required will be slightly lower than the number of jobs.

Commuting Patterns

- 6.14 As described in Section 3, the Borough sees net out-commuting, with the number of people resident in the Borough who are working being about 26% higher than the total number who work in the area based on 2011 Census data. This gives a commuting ratio of 1.26 as shown below.

Table 28: Commuting Patterns in Richmond (2011)

	Richmond
Live and work in LA	18,671
Home workers	14,156
No fixed workplace	7,634
Out-commute	59,455
In-commute	38,651
Total working in LA	79,112
Total living in LA (and working)	99,916
Commuting ratio	1.26

Source: 2011 Census

- 6.15 In translating the commuting pattern data into growth in the labour-force for the Borough it is assumed that the commuting ratio remains at the same level as shown by the 2011 Census (i.e. assumes that the growth in the number of residents who are economically active will need to be 26% higher than the increase in the number of jobs). This recognises that with higher earnings jobs in Central London in particular, it is reasonable to expect some growth in people living in the Borough, but working outside of it.

Double Jobbing

- 6.16 The analysis also considers that a number of people may have more than one job (double jobbing). This can be calculated as the number of people working in the local authority divided by the number of jobs. Data from the Annual Population Survey suggests that around 4.2% of workers have a second job.¹¹ This gives a double jobbing ratio of 0.958 (i.e. the number of jobs can be discounted by 4.2% to estimate the required change in the workforce).

Potential Labour Demand

- 6.17 To work out the change in the resident workforce required to match the forecast number of jobs, the commuting ratio is multiplied by the amount of double jobbing (to give an adjustment factor) and in turn multiplied by the number of jobs – this is shown in Table 29 below. Overall, the Experian forecast expects an increase of 763 jobs per annum across the Borough (2014-33). If commuting patterns and levels of double jobbing remain the same then this would require a higher level of growth in the resident workforce (of about 923 people per annum) – a total change of 17,540 over the full 2014-33 period, leaving aside supply-side constraints.

¹¹ Based on the average of the 2004-14 period accounting for the high error margins associated with the survey data from the APS

Table 29: Job growth and Change in Resident Workforce (2014-27)

Forecast	Additional jobs	Adjustment factor (commuting and double jobbing)	Change in resident workforce
Total (2014-33)	14,500	1.21	17,540
Per annum	763	1.21	923

Source: Experian, NOMIS and 2011 Census

Potential Influences on Labour Demand

- 6.18 The largest growth in the Experian forecasts is expected to be in professional services (2,800 jobs, 2014-31), accommodation and food (1,900 jobs), education (1,200 jobs) specialist construction (1,100 jobs) and retail (1,000 jobs). Jobs in public administration are expected to fall.
- 6.19 The Borough’s economy has an evident strength in professional and business services, and growth potential in the “tech sector” with a high concentration of tech-related jobs. However growth in employment in these sectors – which represent the largest overall employment growth in the forecasts – will be dependent in part on the ability of companies to find suitable accommodation. The Government’s extension of permitted development rights to allow office to residential conversions, based on the Council’s analysis, is expected to result in the potential loss of at least 26% of the Borough’s office stock. Although the Council is seeking to counteract further loss through Article 4 Directions that remove such permitted development rights in certain parts of the borough, a constrained or reducing supply of land and premises is likely to dent the growth potential of these sectors in the Borough and suggests that growth in business and professional services and other office-based activities could be more modest than shown in trend-based forecasts. As businesses grow, it seems highly likely that some will have to move out of the Borough to secure appropriate accommodation.
- 6.20 Other potential influences on economic performance in the longer-term include the potential for a third runway at Heathrow Airport; Crossrail 2; competition from surrounding areas and the Central London labour market; and housing affordability issues. Infrastructure investments such as Crossrail 2 and Heathrow expansion could improve connectivity to the Borough – but this does not necessarily translate into an upward impact on its economy. Heathrow expansion would require additional surface access enhancements to accommodate increased volume of traffic via local road network as identified in the Final Report of the Airports Commission¹² (July 2015); and fundamentally the Borough has few sites available to support growth or capture investment from major firms who might seek to locate close to Heathrow.

¹² https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/440316/airports-commission-final-report.pdf

- 6.21 In respect of Crossrail 2, this is more likely to influence the Borough's attractiveness as a residential location by enhancing accessibility to other parts of South West London and to Central London than it is to support business investment. It should be recognised however that this does have a potential upside impact on housing demand.
- 6.22 In respect of the Borough's economy, housing affordability can be a potential influence on businesses (in respect of recruitment issues). This fact was highlighted as an issue by some of the employers across the borough.
- 6.23 Overall, given the particular impact of a constrained land supply- particularly for office accommodation – it seems reasonable to conclude (based on qualitative evidence) that the Experian forecasts are probably somewhat optimistic regarding future economic performance for use in the SHMA.

Modelling Potential Changes in Labour Supply

- 6.24 Having estimated the likely required change to the workforce under a range of scenarios, the next stage is to estimate how much growth is implied by demographic projections (and hence if levels of population growth would need to change so that a sufficient workforce is available). This is a complex issue and subject to a potentially high error margin given the range of influences on the relationship between demographics, housing market dynamics and economic performance. In particular, it is unclear to what extent, given improving life expectancy and changes to pensionable age, we might see people working for longer and retiring later; or that more people might take on more than one job.
- 6.25 For example, all of the main forecasting houses (Experian, Oxford Economics and Cambridge Econometrics) use population data as an input to their forecasts and each will estimate different levels of job growth. Inherently, each of the forecasting houses are therefore suggesting that whatever level of job growth they expect, this will be met by the population (and the population as it is projected to change). Given the different levels of job growth it is therefore implicit that there will be an assumption about how employment rates are likely to change, and this assumption will be different depending on the forecasting house. There could also be changes such as double jobbing within the modelling although this is difficult to determine.
- 6.26 Some consultancies (both for public and private sector clients) have looked for other sources of employment or economic activity rate data; the most commonly used being a set of figures published by the Office for Budget Responsibility (OBR). These however are at a national level and are not robustly applicable to smaller areas. Perhaps more significantly, the level of job growth

(growth in residents in employment) estimated by OBR is significantly lower than from any of the main forecasting houses (a growth in residents in employment of about 2,500,000 from 2014-35 compared with a figure in excess of 4,000,000 in the most recent Experian forecast for the United Kingdom).

6.27 One final set of rate data that is utilised is that published by Kent County Council (KCC) in November 2014. This is specific to Kent and so not applicable in other areas, however, more importantly many of the rates used in the model draw from 2006 Labour Force Projections. This publication, based on the latest data for 2014, can be seen to have been substantially wrong for all age groups where a reasonable comparison can be made with more up-to-date information.

6.28 Hence, there is no clear and agreed set of figures which can be used to estimate how economic activity rates might change in the future. At best, any rates will be informed guesswork and at worse they can simply be unrealistic.

6.29 For these reasons this report has sought to look at changes to economic activity rates using as much data as possible for which there is relative certainty. Whilst some level of assumption is required, the method used is designed to limit the amount of speculation and therefore provide some certainty that the outputs properly reflect what might be expected to happen. The method used considers two key groups of the population:

- The population of working age who are economically active; and
- The population who have reached retirement age who are economically active.

6.30 When modelling data against job-growth forecasts it is assumed that the increase in the number of residents in employment would need to be matched by the increase in the number of people who are economically active.

Working-Age Population

6.31 The first part of the analysis looks at the working-age population. The working age being fixed by Central Government through the setting of pensionable age (most recently in the Pensions Act of 2014). The use of working-age is also consistent with wording in the PPG [2a-018] which states that:

'plan makers should make an assessment of the likely change in job numbers based on past trends and/or economic forecasts as appropriate and also having regard to growth of the working age population in the housing market area' [emphasis added]

6.32 Estimating the working age population and how this will change over time is not as straightforward as it has been in the past where conventionally the working age population has been defined as the population aged 16-64 (and previously 16-64 for males and 16-59 for females). The situation currently is one where there are incremental changes to pensionable age for both sexes which means that gradually people will be able to draw a state pension later in life.

6.33 Tables 32 and 33 below are taken from supporting information from the ONS 2014-based National Population Projections from ONS and show for both males and females the proportion of an age group who are considered to be of pensionable age. For example, the first table shows in 2019 that an estimated 60% of males aged 65 will be of pensionable age and in 2020 about 10% will have reached that threshold. The data is cut off from 2027 and age 66 as there are currently no future proposals for changes to pensionable age until 2044 (which is some way beyond the date of projections developed in this report).

Table 30: Proportion of Males of Pensionable Age by Age and Date

	Age group						
	60	61	62	63	64	65	66
2011	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	100.00%
2012	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	100.00%
2013	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	100.00%
2014	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	100.00%
2015	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	100.00%
2016	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	100.00%
2017	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	100.00%
2018	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%	100.00%
2019	0.00%	0.00%	0.00%	0.00%	0.00%	60.27%	100.00%
2020	0.00%	0.00%	0.00%	0.00%	0.00%	9.86%	100.00%
2021	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%
2022	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%
2023	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%
2024	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%
2025	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%
2026	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	84.70%
2027	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	35.07%

Source: (ONS – table: pensioncalcsfor2014npps_tcm77-421363.xls)

Table 31: Proportion of Females of Pensionable Age by Age and Date

	Age group						
	60	61	62	63	64	65	66
2011	35.07%	100.00%	100.00%	100.00%	100.00%	100.00%	100.00%
2012	0.00%	84.66%	100.00%	100.00%	100.00%	100.00%	100.00%
2013	0.00%	34.97%	100.00%	100.00%	100.00%	100.00%	100.00%
2014	0.00%	0.00%	84.70%	100.00%	100.00%	100.00%	100.00%
2015	0.00%	0.00%	35.07%	100.00%	100.00%	100.00%	100.00%
2016	0.00%	0.00%	0.00%	76.44%	100.00%	100.00%	100.00%
2017	0.00%	0.00%	0.00%	1.37%	100.00%	100.00%	100.00%
2018	0.00%	0.00%	0.00%	0.00%	26.58%	100.00%	100.00%
2019	0.00%	0.00%	0.00%	0.00%	0.00%	60.27%	100.00%
2020	0.00%	0.00%	0.00%	0.00%	0.00%	9.86%	100.00%
2021	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%
2022	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%
2023	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%
2024	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%
2025	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	100.00%
2026	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	84.70%
2027	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	35.07%

Source: (ONS – table: pensioncalcsfor2014npps_tcm77-421363.xls)

6.34 Using the various demographic projections developed it is possible to apply the rates above to see how the working-age population might change and this is shown in the table below. Over the 2014-33 period the working-age population is projected to increase – by 22,800 people when linking to the GLA Long-Term Trend Projection (unconstrained) and a reduction of 2,300 people with the GLA SHLAA (CLG) Scenario.

Table 32: Projected Change in Working-Age Population – LB Richmond (2014-33)

	Working-age population (2014)	Working-age population (2033)	Change in working-age population	% change
GLA Long-Term Trends	122,622	145,387	22,764	18.6%
GLA Short-Term Trends	122,622	144,609	21,987	17.9%
GLA SHLAA Capped	123,753	131,638	7,885	6.4%
GLA SHLAA CLG	123,753	121,487	-2,266	-1.8%
ONS 2014-based SNPP	122,622	148,097	25,474	20.8%
ONS 2014-based (+MYE)	122,622	145,926	23,304	19.0%

Source: Derived from demographic projections

6.35 However, looking at the working-age population does not directly indicate how many are economically active; some people of working age will not be in work or actively seeking employment. To look at the proportion who are economically active, Census data (from 2011) has been analysed. This looks at the population aged 16-64 for males and 16-59 for females – the different age band for females reflects the fact that at the time of the Census changes to pensionable age were only just starting and so the vast majority of females in the 60-64 age band would have reached pensionable age. Table 33 below shows the proportion of the working age population who are economically active – across the Borough this is a high figure of 82%.

Table 33: Proportion of Working-Age Population who are Economically Active

	Working-age population (2011)	Economically active working-age population (2011)	% economically active
Richmond	119,518	97,987	82.0%

Source: Census 2011

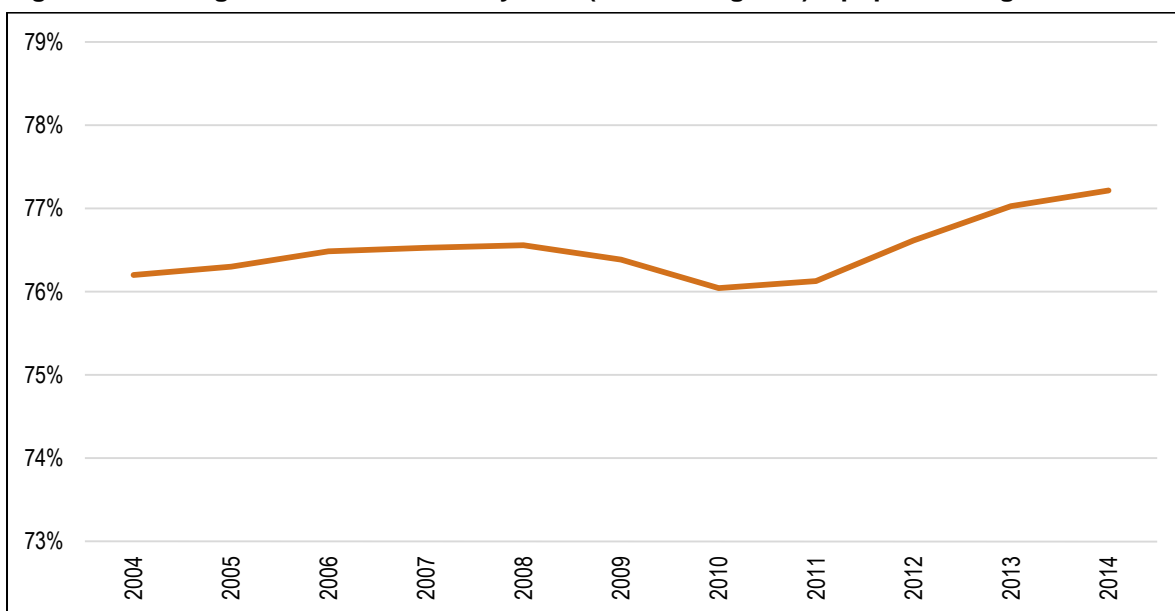
6.36 This proportion (82%) can be applied to the change in the working age population to estimate how the number of economically active residents would change. It is however worth briefly assessing if this figure is likely to increase (or decrease) over time.

6.37 To study this, a time series analysis has been carried out using Annual Population Survey data looking at the 16-64 age group. This age group does not exactly match ‘working-age’ due to changes to pensionable age but is the closest match available to the age groups which need to be studied. The core analysis looks at how rates have changed across the whole United Kingdom – this is due to there being relatively high error margins associated with the data at a smaller are level. The time period covered is from 2004 to 2014 which is the longest consistent time series available from this source.

6.38 The analysis shows that if anything the proportion of the working-age population who are economically active has increased slightly over the past decade – however, it should be stressed that the changes are pretty modest and only start from about 2010 (which does coincide with the start of pension reforms).

6.39 On this basis it is considered that there is no evidence to suggest that economic activity rates of the working-age population will increase in the future (and likewise no evidence of a decline). Hence for the purposes of modelling the percent of people economically active (as shown by the Census) is applied to the growth in the working age population to derive an estimate of the change in the economically active population.

Figure 31: Change in Economic Activity Rate (United Kingdom) – population aged 16-64



Source: Annual Population Survey (from nomis)

Economically active Population of Pensionable Age

6.40 The analysis above has looked at the working age population and the likely proportion who will be economically active. To complete the analysis of how the economically active population might change it is also necessary to consider people who have reached pensionable age who are still working (or possibly seeking work).

6.41 A similar process has been undertaken and this begins by considering the pensionable age population and how this will change in the future. Table 34 below shows that the number of people of pensionable age is projected to increase by about 4,800-11,400 (depending on the projection being run) in the 2014-33 period.

Table 34: Projected Change in Pensionable-Age Population – LB Richmond (2014-33)

	Pensionable-age population (2014)	Pensionable-age population (2033)	Change in pensionable-age population	% change
GLA Long-Term Trends	30,999	39,388	8,390	27.1%
GLA Short-Term Trends	30,999	42,246	11,247	36.3%
GLA SHLAA Capped	30,553	37,128	6,575	21.5%
GLA SHLAA CLG	30,553	35,369	4,816	15.8%
ONS 2014-based SNPP	30,999	42,333	11,334	36.6%
ONS 2014-based (+MYE)	30,999	42,395	11,396	36.8%

Source: Derived from demographic projections

6.42 Again, the change in the number of people of pensionable age does not directly show how many are economically active. To look at the proportion who are economically active, Census data (from 2011) has again been utilised. This looks at the population aged 65+ for males and 60+ for females – consistent with the analysis undertaken for the working-age population. The table below shows the proportion of the pensionable age population who are economically active – across the Borough this is a figure of 22%. Again this is relatively high.

Table 35: Proportion of Pensionable-Age Population who are Economically Active

	Pensionable-age population (2011)	Economically active pensionable-age population (2011)	% economically active
Richmond	30,534	6,837	22.4%

Source: Census 2011

6.43 Again, this proportion could be applied to the change in the pensionable age population to estimate how the number of economically active residents would change. It is however again worth assessing if this figure is likely to increase (or decrease) over time.

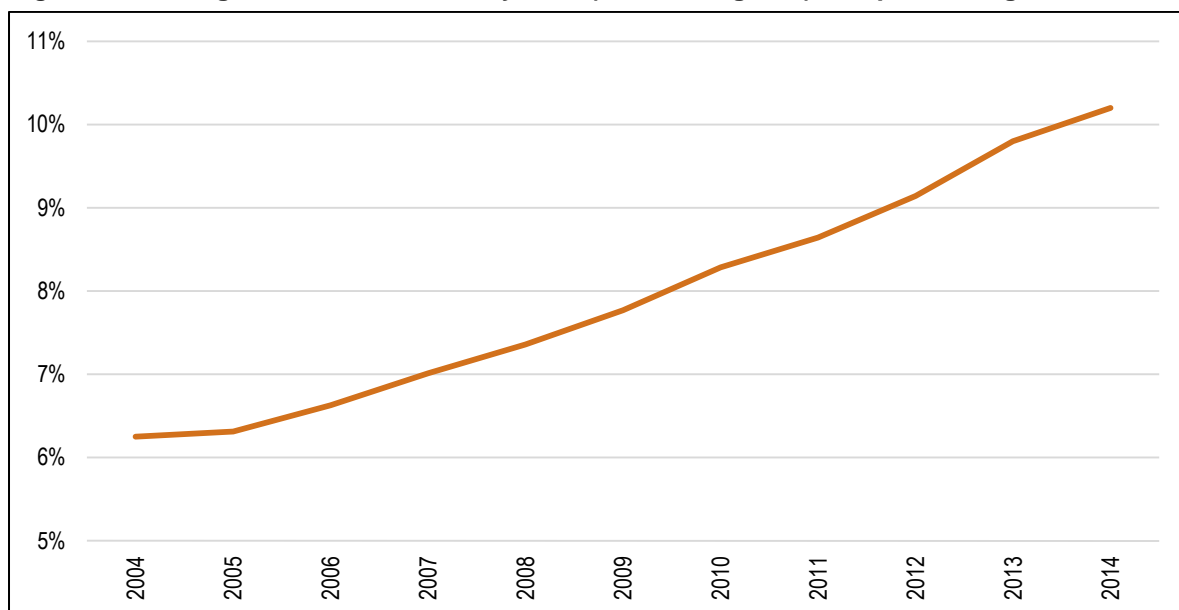
6.44 To study this, a time series analysis has again been carried out using Annual Population Survey data looking at the 65+ age group. This age group does not exactly match ‘pensionable-age’ but is the closest match available from this source. The core analysis looks at how rates have changed across the whole United Kingdom – this again is due to there being relatively high error margins associated with the data at a smaller are level. The time period covered is from 2004 to 2014 which is the longest consistent time series available from this source.

6.45 The analysis shows that the proportion of the pensionable-age population who are economically active has increased notably over the past decade (increasing from about 6% in 2004 to 10% in

2014) – this would suggest that further potential increase in activity rates of the older population might reasonably be expected. It is difficult to know by how much the economic activity rate of this cohort of the population might change in the future and the analysis takes the pragmatic view that further increases will be at half of the rate seen in the 2004-14 decade (this is a 0.2% increase per annum).

6.46 Whilst there is no precedent in the use of a ‘half’ increase, it is arguably a reasonable assumption for modelling given that the data clearly shows an upward trend with no evidence of this slowing down. However, it is noted that such a trend could not continue indefinitely on a linear pattern (to do so would mean that eventually everyone aged 65+ would be assumed to be economically active (which is not realistic)). Additionally, the use of a ‘half’ recognises that much of the ageing of the population is in older age groups (e.g. those aged 85+) where activity rates are likely to be very low; that said an ageing of the population will also be underpinning the APS analysis.

Figure 32: Change in Economic Activity Rate (United Kingdom) – Population aged 65+



Source: Annual Population Survey (from nomis)

6.47 Hence, on the basis of the analysis and discussion above the following economic activity rates have been applied to the pensionable age population in each of 2014 and 2033.

Table 36: Estimated Economic Activity Rates 2014 and 2033 – Population of Pensionable Age

	% economically active (2014)	% economically active (2033)
Richmond	23.0%	26.8%

Source: Derived from Census 2011 and APS

Resultant Scenarios for Growth in Labour Supply

- 6.48 Having run through an analysis of the two groups from which economically active people will arise (those of working age and those who have reached pensionable age) it is possible to estimate the overall change in the number of economically active people in the Borough (i.e. the growth in labour supply). This is set out in the table below, Table 37, and uses the proportions of each group who are economically active (and changes as appropriate) applied to the relevant population.
- 6.49 The analysis shows that linked to the GLA Long-Term Projection there would be an increase in the economically active population of about 23,100 people (2014-33). This figure decreases to just 500 in the projection linked to GLA SHLAA (CLG). These figures sit both above and below the change in the resident workforce suggested as being required by the economic forecasts (total growth in the resident workforce of 17,540 people).

Table 37: Estimated Change to the Economically Active Population (2014-33)

	Change in working-age economically active	Change in pensionable age economically active	Total change in economically active	Per annum change
GLA Long-Term Trends	19,709	3,426	23,135	1,218
GLA Short-Term Trends	19,036	4,191	23,227	1,222
GLA SHLAA Capped	6,827	2,923	9,749	513
GLA SHLAA CLG	-1,962	2,451	489	26
ONS 2014-based SNPP	22,055	4,214	26,270	1,383
ONS 2014-based (+MYE)	20,176	4,231	24,407	1,285

Source: Derived from Demographic Projections

Implications

- 6.50 Our analysis of economic dynamics showed that trend-based forecasts expected growth in employment of 760 jobs per annum. GLA trend-based projections draw relatively similar conclusions, projecting 790 additional jobs per annum. Assuming a continuation of current patterns of commuting and levels of people with more than one job, the Experian forecasts might require workforce growth of 923 persons per annum.
- 6.51 This can be contrasted with the expected level of workforce growth in the (unconstrained) projections based on long-term migration trends. These show workforce growth of 1,218 persons per annum.

- 6.52 Given that the level of growth in the economically active population sits either above or below that required to meet job growth forecasts, it is of interest to assess what level of housing would be required for economic forecasts to be met. Within the modelling, migration assumptions have been changed so that across the Borough the increase in the economically active population matches the increase in the resident workforce required.
- 6.53 The changes to migration have been applied on a proportionate basis; the methodology assumes that the age/sex profile of both in- and out-migrants is the same as underpins the SNPP with adjustments being consistently applied to both internal (domestic) and international migration. Adjustments are made to both in- and out-migration (e.g. if in-migration is increased by 1% then out-migration is reduced by 1%).
- 6.54 Once the level of economically active population matches the job growth forecast the population (and its age structure) is modelled against CLG headship rates (midpoint) to see what level of housing provision that might imply.
- 6.55 The table below shows an estimate of housing need set against the job growth scenario. The analysis shows a housing need of 963 dwellings per annum. It should be noted that this is based on our adjustment to the SNPP; a different housing need figure would be expected if it were possible to model a scenario as an adjustment to the GLA long-term migration based projections.

Table 38: Projected housing need – Experian job-led scenario and 2014-based Headship Rates – LB Richmond (2014-33)

	Households 2014	Households 2033	Change in households	Per annum	Dwellings (per annum)
Experian	82,640	100,268	17,628	928	963

Source: Demographic projections

- 6.56 By looking at the relationship between the growth in the economically active population and housing need it has been estimated that the housing need based on GLA migration data and an increase in the economically active population of 17,540 people would show a need for around 874 dwellings per annum (2014-33).
- 6.57 Given both the outcomes of the modelling, and evidence that the supply of floorspace within the Borough is restricted and potential impact of this on future economic performance, there is little evidence that – setting aside housing land supply constraints – economic growth would provide an upside in identifying objectively assessed housing need.

Summary – Economic-led Housing Need

- Analysis has sought to estimate the likely level of housing needed to be delivered if the resident workforce is to increase sufficiently to meet an Experian job-growth forecast. This showed an increase of 763 additional jobs per annum across the Borough to 2033. This is a trend-based estimate, with qualitative evidence indicating that in reality employment growth could well be lower than this reflecting a constrained availability of commercial floorspace (and in particular office floorspace).
- The modelling suggests that with trend based assumptions (using the GLA long-term migration model) the economically active population can be expected to increase by about 23,100 people (2014-33) – this is above the change needed to match the economic forecast. The implication of this would be that in defining OAN there is not a basis for adjusting upwards trend-based projections to support employment growth. There is a broad similarity between the scale of growth envisaged in workforce and jobs, leaving aside development constraints.
- Leaving aside constraints, it is estimated that to meet the job growth forecasts there will need to be provision of about 963 dwellings per annum across the Borough. This figure is slightly below that suggested in the trend-based demographic modelling but some way above the SHLAA scenarios. Some caution should be attached to this figure as it has been based on an adjustment to ONS population projection data (which is based on short-term trends). Were a similar projection to be undertaken as an adjustment to the GLA long-term migration then a lower need would be likely to be derived – a best estimate is that the need shown in such a scenario would be for around 874 dwellings per annum.
- The modelling undertaken suggests that a realistic estimate of growth in labour supply, taking account of land supply and commuting would be around 500 jobs to 2033, based on the GLA SHLAA (CLG) Projection. However, employment growth could be stronger than this – if for instance we saw a greater movement out of older residents; or change in commuting dynamics.
- Overall given the inter-connected nature of London’s labour market, it is realistic that workforce growth within the Borough will influence potential economic growth (and could potentially result in recruitment difficulties, particularly for lower-skilled roles) but that employment growth over the 500 set out above could be achieved.

7 AFFORDABLE HOUSING NEED

- 7.1 In this section we discuss levels of affordable housing need in LB Richmond. Affordable housing need is defined in the NPPF (Annex 2) as *'social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market'*. The PPG (2a-022) describes affordable housing need as being an estimate of *'the number of households and projected households who lack their own housing or live in unsuitable housing and who cannot afford to meet their housing needs in the market'*.
- 7.2 The PPG sets out a model for assessing affordable housing need – this model largely replicates the model set out in previous 2007 SHMA Practice Guidance. The 2007 Guidance contained more detail about specific aspects of the analysis and so is referred to in this section as appropriate. The analysis is based on secondary data sources. It draws on a number of sources of information including 2011 Census data, demographic projections, house prices/rents and income information.
- 7.3 The affordable housing needs model is based largely on housing market conditions (and particularly the relationship of housing costs and incomes) at a particular point in time – the time of the assessment – as well as the existing supply of affordable housing which can be used to meet the need. The base date for analysis is 2015 (e.g. data about housing costs and incomes is for 2015). It is recognised that the analysis should align with other research and hence estimates of affordable housing need are provided in this section on an annual basis for the 19-year period between 2014 and 2033 (to be consistent with the demographic projections described in the previous section).

Key Definitions

- 7.4 We begin by setting out key definitions relating to affordable housing need, affordability and affordable housing.

Affordable Housing

- 7.5 The NPPF provides the definition of affordable housing (as used in this report). The following is taken from Annex 2 of NPPF.

"Affordable housing: Social rented, affordable rented and intermediate housing, 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."

- 7.6 Within the definition of affordable housing there is also the distinction between social rented affordable rented, and intermediate housing. Social rented housing is defined as:

“Social rented housing is owned by local authorities and private registered providers (as defined in section 80 of the Housing and Regeneration Act 2008), for which guideline 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 Homes and Communities Agency.”

7.7 Affordable rented housing is defined as:

“Affordable rented housing is 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).”

7.8 The definition of intermediate housing is shown below:

“Intermediate housing is homes for sale and rent provided at a cost above social rent, but below market levels subject to the criteria in the Affordable Housing definition above. These can include shared equity (shared ownership and equity loans), other low cost homes for sale and intermediate rent, but not affordable rented housing.”

Current Affordable Housing Need

7.9 Current affordable housing need is defined as the number of households who lack their own housing or who live in unsuitable housing and who cannot afford to meet their housing needs in the market.

Newly-Arising Need

7.10 Newly-arising (or future) need is a measure of the number of households who are expected to have an affordable housing need at some point in the future. In this assessment we have used trend data from CoRe along with demographic projections about the number of new households forming (along with affordability) to estimate future needs.

Supply of Affordable Housing

7.11 An estimate of the likely future supply of affordable housing is also made (drawing on secondary data sources about past lettings). The future supply of affordable housing is subtracted from the newly-arising need to make an assessment of the net future need for affordable housing.

Affordability

7.12 Affordability is assessed by comparing household incomes, based on income data modelled using a number of sources including CACI, ASHE, the English Housing Survey (EHS) and ONS data, against the cost of suitable market housing (to either buy or rent). Separate tests are applied for home ownership and private renting and are summarised below:

- a. *Assessing whether a household can afford home ownership: A household is considered able to afford to buy a home if it costs 3.5 times the gross household income – CLG guidance suggests using different measures for households with multiple incomes (2.9x) and those with a single income (3.5x), however (partly due to data availability) we have only used a 3.5 times multiplier for analysis. This ensures that affordable housing need figures are not over-estimated – in practical terms it makes little difference to the analysis due to the inclusion of a rental test (below) which tends to require lower incomes for households to be able to afford access to market housing;*
- b. *Assessing whether a household can afford market renting: A household is considered able to afford market rented housing in cases where the rent payable would constitute no more than a particular percentage of gross income. The choice of an appropriate threshold is an important aspect of the analysis, CLG guidance (of 2007) suggested that 25% of income is a reasonable start point but also notes that a different figure could be used. Analysis of current letting practice suggests that letting agents typically work on a multiple of 40% (although this can vary by area). Government policy (through Housing Benefit payment thresholds) would also suggest a figure of 40%+ (depending on household characteristics). Consideration of a reasonable proportion of income to use in analysis can be found later in this section although outputs are provided for a range of thresholds (from 25% to 40%).*

7.13 It should be recognised that a key challenge in assessing affordable housing need using secondary sources is the lack of information available regarding households' existing savings. This is a key factor in affecting the ability of young households to purchase housing particularly in the current market context where a deposit of at least 10% is typically required for the more attractive mortgage deals. In many cases households who do not have sufficient savings to purchase have sufficient income to rent housing privately without support, and thus the impact of deposit issues on the overall assessment of affordable housing need is limited.

Local Prices & Rents

7.14 An important part of the SHMA is to establish the entry-level costs of housing to buy and rent – this data is then used in the assessment of the need for affordable housing. The affordable housing needs assessment compares prices and rents with the incomes of households to establish what proportion of households can meet their needs in the market, and what proportion require support and are thus defined as having an 'affordable housing need.'

7.15 In this section we establish the entry-level costs of housing to both buy and rent across the study area. Our approach has been to analyse Land Registry and Valuation Office Agency (VOA) data to establish lower quartile prices and rents. For the purposes of analysis (and to be consistent with the PPG) we have taken lower quartile prices and rents to reflect the entry-level point into the market.

7.16 Table 39 below shows estimated lower quartile house prices by dwelling type and the volume of sales. The data shows that around 43% of properties sold were flats with a lower quartile price of £320,000; at the other end of the scale less than 7% of homes sold were detached and these had a

lower quartile price of nearly £800,000. The data shows a lower quartile cost for all dwellings of £405,000.

Table 39: Lower Quartile Sales Prices by Type (Year to September 2015)

	Flat	Terraced	Semi-detached	Detached	All dwellings
Lower quartile	£319,950	£530,000	£560,000	£791,250	£405,000
Number of sales	1,324	1,039	530	216	3,109

Source: Land Registry (2015)

7.17 A similar analysis has been carried out for private rents using Valuation Office Agency (VOA) data – this also covers a 12-month period to September 2015. For the rental data information about dwelling sizes is provided (rather than types). The analysis shows an average lower quartile cost (across all dwelling sizes) of £1,300 per month with the main size of dwelling being a two-bedroom home (41% of all lettings).

Table 40: Lower Quartile Private Rents by Size and Location (Year to September 2015) – per month

	Room only	Studio	1 bedroom	2 bedrooms	3 bedrooms	4+ bedrooms	All dwellings
Lower quartile	£500	£750	£1,095	£1,350	£1,700	£2,900	£1,300
Number of rents	11	68	543	1,003	409	384	2,418

Source: Valuation Office Agency (2015)

What is an appropriate threshold for affordability?

7.18 Having undertaken an analysis of the cost of housing, it is useful to think about what might be a reasonable figure to use as an affordability threshold (in terms of the amount of income that could be spent on housing costs). As noted previously there is no guidance on this topic within the PPG and our own analysis shows that analysis based upon 25% to 40% could be considered a reasonable starting point.

7.19 The threshold of income to be spent on housing should be set by asking the question ‘*what level of income is expected to be required for a household to be able to access market housing without the need for a subsidy (e.g. through Housing Benefit)?*’ The choice of an appropriate threshold will to some degree be arbitrary and will be linked to the cost of housing rather than income. Income levels are only relevant in determining the number (or proportion) of households who fail to meet the threshold. It would be feasible to find an area with very low incomes and therefore conclude that no households can afford housing, alternatively an area with very high incomes might show the opposite output. The key here is that local income levels are not setting the threshold, but are simply being used to assess how many can or can’t afford market housing.

- 7.20 It is therefore useful to look at housing costs in the Borough and contrast this with other areas. The analysis in this section has shown a lower quartile rent (across all dwelling sizes) of £1,300 per month. This is a very high lower quartile rent level – the highest in Outer London and only exceeded by six Inner London Boroughs. The figure compares with a national lower quartile rent of just £494 per month. It is clear from this that the Borough sits very much towards the top of range. Although arbitrary, if the upper rent areas were considered to be ‘40%’ areas and lower rent areas ‘25%’ locations then the Borough would sit towards the top of this range.
- 7.21 However, the key point when looking at thresholds and housing costs is one of ‘residual income’ – i.e. the amount of money a household has after housing costs are paid for. Using the national example (a lower quartile rent of £494), if a household spent 25% of income on housing then their residual income would be £1,482 per month, the same threshold in Richmond would show a residual income of £3,900 – if the threshold in Richmond were increased to 40% then the residual income would be around £1,950. Hence it could be concluded that a 40% threshold in the Richmond is reasonable (given, as it does, a residual income which is some £500 a month more than at the national level with a 25% threshold). This analysis is not conclusive given that such an analysis would need to be predicated on a) an assumption that 25% in England is an appropriate benchmark; b) that living costs (other than housing) are equal across areas and c) to note that the analysis is based on gross income (households with higher gross incomes would be expected to be paying more tax). It does however serve to show why the cost of housing is the key input into understanding a reasonable threshold for affordability.
- 7.22 Despite the potential issues with looking at residual incomes and housing costs, it is clear that even with a 40% threshold, it would be expected that a household in the Borough would have a reasonable level of income after housing costs. It is therefore concluded in seeking to establish the need for affordable housing that the outputs should be based on a 40% affordability threshold (although summary data is also provided to show what the outputs would be with a full range of potential thresholds (25%, 30%, 35% and 40%). With a lower quartile rent of £1,300 per month, the analysis essentially sets a threshold for affordability at £39,000 per annum (i.e. a household with an income below this level will be deemed as unable to afford market housing).

Income Levels and Affordability

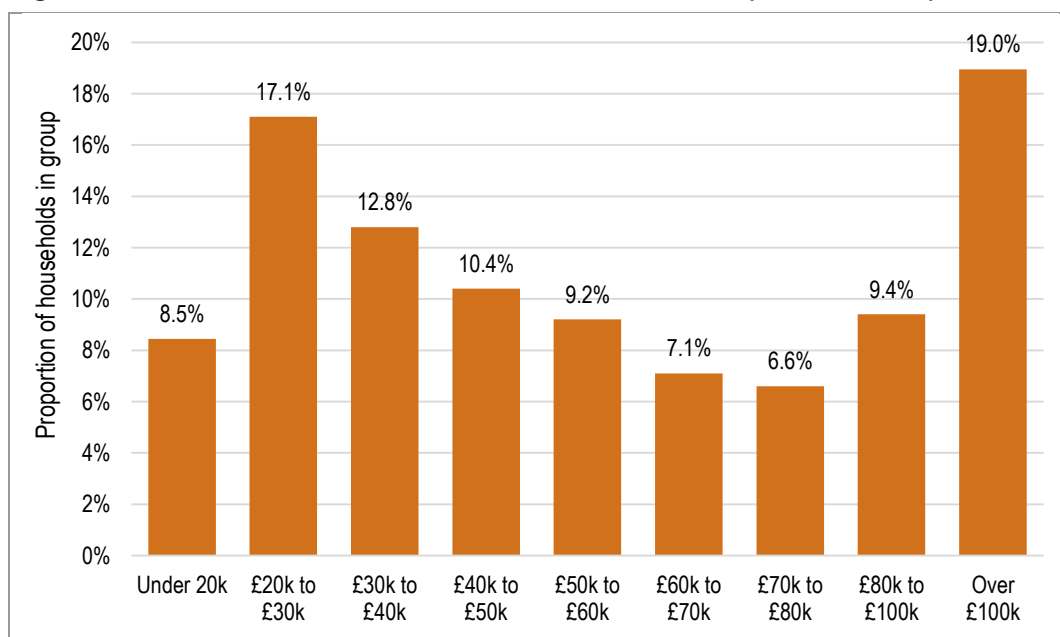
- 7.23 Following on from our assessment of local prices and rents it is important to understand local income levels as these (along with the price/rent data) will determine levels of affordability and also provide an indication of the potential for intermediate housing to meet needs. Data about total household income has been modelled on the basis of a number of different sources of information

to provide both an overall average income and the likely distribution of incomes in each area. The key sources of data include:

- CACI from *Wealth of the Nation 2012* – to provide an overall national average income figure for benchmarking
- English Housing Survey (EHS) – to provide information about the distribution of incomes
- Annual Survey of Hours and Earnings (ASHE) – to assist in looking at how incomes have changed from 2012 to 2015
- ONS modelled income estimates – to assist in providing more localised income estimates (i.e. specifically for the Richmond)

7.24 Drawing all of this data together we have therefore been able to construct an income distribution for the Borough for 2015. The data shows that around a quarter of households have incomes below £30,000 with a further quarter in the range of £30,000 to £50,000. The overall average (median) income of all households in the Borough was estimated to be around £51,200 with a mean income of £67,300. This is partially distorted by a large number of households earning over £100,000.

Figure 33: Distribution of Household Income in Richmond (2015 estimate)



Source: Derived from ASHE, EHS, CACI and ONS data

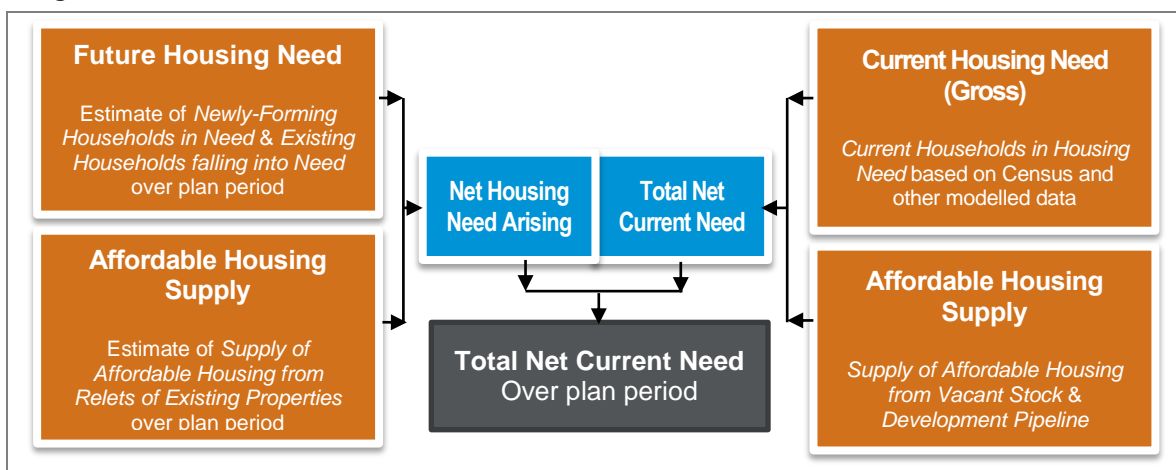
7.25 To assess affordability, we have looked at households' ability to afford either home ownership or private rented housing (whichever is the cheapest), without financial support. The distribution of household incomes is then used to estimate the likely proportion of households who are unable to afford to meet their needs in the private sector without support, on the basis of existing incomes. This analysis brings together the data on household incomes with the estimated incomes required to access private sector housing.

7.26 Different affordability tests are applied to different parts of the analysis depending on the group being studied (e.g. recognising that newly forming households are likely on average to have lower incomes than existing households). Assumptions about income levels are discussed where relevant in the analysis that follows.

Affordable Housing Needs Assessment

7.27 Affordable housing need has been assessed using the Basic Needs Assessment Model, in accordance with the CLG Practice Guidance. This model is summarised in the chart below.

Figure 34: Overview of Basic Needs Assessment Model



7.28 The figures presented in this report for affordable housing needs have been based on secondary data sources including analysis of 2011 Census data. The modelling undertaken provides an assessment of affordable housing need for a 19-year period from 2014 to 2033 (which is then annualised). Each of the stages of the affordable housing needs model calculation are discussed in more detail below.

Further Methodological Issues

7.29 Due to the analysis being based on secondary data sources only, there are a number of assumptions that need to be made to ensure that the analysis is as robust as possible. Key assumptions include considering the number of households who have a need due to issues such as insecure tenancies or housing costs – such households form part of the affordable need as set out in guidance (see paragraph 2a-023 of the PPG for example) but are not readily captured from secondary data sources. Assumptions also need to be made about the likely income levels of different groups of the population (such as newly forming households), recognising that such households' incomes may differ from those in the general population.

7.30 To overcome the limitations of a secondary-data-only assessment, additional data has been taken from a range of survey-based affordable needs assessments carried out by GL Hearn over the past five years or so. These surveys (which cover a range of areas and time periods) allow the assessment to consider issues such as needs which are not picked up in published sources and different income levels for different household groups. This data is then applied to actual data for Richmond (e.g. from the Census) as appropriate. It is the case that outputs from surveys in other areas show remarkably similar outputs to each other for a range of core variables (for example the income levels of newly forming households when compared with existing households) and are therefore likely to be fairly reflective of the situation locally in Richmond. Where possible, data has also been drawn from national surveys (notably the English Housing Survey).

7.31 It should also be stressed that the secondary data approach is consistent with the PPG. Specifically, guidance states that:

'Plan makers should avoid expending significant resources on primary research (information that is collected through surveys, focus groups or interviews etc. and analysed to produce a new set of findings) as this will in many cases be a disproportionate way of establishing an evidence base. They should instead look to rely predominantly on secondary data (e.g. Census, national surveys) to inform their assessment which are identified within the guidance'.

7.32 The analysis that follows is therefore consistent with the requirements of the Planning Practice Guidance.

Current Affordable Housing Need

7.33 In line with PPG, the current need for affordable housing need has been based on considering the likely number of households with one or more housing problem. A list is initially set out in paragraph 2a-023 of the PPG and provides the following.

What types of households are considered in affordable housing need?

The types of households to be considered in housing need are:

- homeless households or insecure tenure (e.g. housing that is too expensive compared to disposable income);
- households where there is a mismatch between the housing needed and the actual dwelling (e.g. overcrowded households);
- households containing people with social or physical impairment or other specific needs living in unsuitable dwellings (e.g. accessed via steps) which cannot be made suitable in-situ
- households that lack basic facilities (e.g. a bathroom or kitchen) and those subject to major disrepair or that are unfit for habitation;
- households containing people with particular social needs (e.g. escaping harassment) which cannot be resolved except through a move.

Source: PPG [ID 2a-023-20140306]

7.34 Table 41 below sets out the data used in each part of the assessment. All efforts have been made to avoid double counting; this includes excluding households living in non-hostel and B&B properties from the number of 'other' households in need (such households will be included in the homeless in temporary accommodation). However, there may be some issues with looking at both concealed households and overcrowding – it is likely that providing housing for some concealed households would remove an overcrowding issue – no account has been taken of this and therefore arguably the figures presented could be slightly too high. On the other hand, the analysis of concealed households only includes those with children and it is possible that some 'childless' concealed households also have a need (which would make the figures too low). On balance it is considered that the analysis and outputs (whilst noting some potential deficiencies of using a secondary data approach) will be as accurate and plausible as is reasonably possible.

Table 41: Main Sources for Assessing the Current Unmet Need for Affordable Housing

	Source	Notes
Homeless households	CLG Live Table 784	Total where a duty is owed but no accommodation has been secured PLUS the total in temporary accommodation
Households in overcrowded housing	Census table LC4108EW	Analysis undertaken by tenure
Concealed households	Census table LC1110EW	Number of concealed families (with dependent or non-dependent children)
Exiting affordable housing tenants in need	Modelled data linking to past survey analysis	Will include households with many of the issues in the first box above (e.g. insecure tenure).
Households from other tenures in need	Modelled data linking to past survey analysis	

Source: PPG [ID 2a-024-20140306]

7.35 The table below therefore shows the initial estimate of the number of households who potentially have a current housing need. These figures are before any consideration of affordability has been made and has been termed 'the number of households in unsuitable housing'. Overall, the analysis suggests that there are 6,100 households living in unsuitable housing (or without housing) – this is 7.3% of the estimated total number of households living in the Borough in 2014.

Table 42: Estimated number of Households living in Unsuitable Housing

Category of 'need'	Richmond
Homeless households	335
Households in overcrowded housing	3,089
Concealed households	283
Exiting affordable housing tenants in need	210
Households from other tenures in need	2,155
Total	6,073

Source: CLG Live Tales, Census (2011) and data modelling

7.36 In taking this estimate forward, the data modelling estimates housing unsuitability by tenure. From the overall number in unsuitable housing, households living in affordable housing are excluded (as these households would release a dwelling on moving and so no net need for affordable housing will arise). The analysis also excludes 90% of owner-occupiers under the assumption (which is supported by analysis of survey data) that the vast majority will be able to afford housing once savings and equity are taken into account. A final adjustment is to slightly reduce the unsuitability figures in the private rented sector to take account of student-only households – such households could technically be overcrowded/living in unsuitable housing but would be unlikely to be considered as being in affordable housing need. Once these households are removed from the analysis, the remainder are taken forward for affordability testing.

7.37 Table 43 below shows that as of mid-2014 it is estimated that there were 3,630 households living in unsuitable housing (excluding current social tenants and the majority (90%) of owner-occupiers) – this represents 4.4% of all households in the area in 2014.

Table 43: Unsuitable housing by tenure and numbers to take forward into affordability modelling

	In unsuitable housing	Number to take forward for affordability testing
Owner-occupied	1,374	137
Social rented	1,161	0
Private rented	2,920	2,875
No housing (homeless/concealed)	618	618
Total	6,073	3,630

Source: CLG Live Tales, Census (2011) and data modelling

7.38 Having established the figure of 3,630 households in unsuitable housing, it needs to be considered that a number of these households might be able to afford market housing without the need for subsidy, because they could afford a suitable market housing solution. For an affordability test the income data has been used, with the distribution adjusted to reflect a lower average income amongst households living in unsuitable housing – for the purposes of the modelling an income distribution that reduces the level of income to 69% of the figure for all households has been used to identify the proportion of households whose needs could not be met within the market (for households currently living in housing other than in temporary accommodation). A lower figure (of 42%) has been used to apply an affordability test for the concealed/homeless households who do not currently occupy housing and those in temporary accommodation. These two percentage figures have been based on a consideration of typical income levels of households who are in unsuitable housing (and excluding social tenants and the majority of owners) along with typical income levels of households accessing social rented housing (for those without accommodation). These figures are considered to be best estimates, and likely to approximately reflect the differing income levels of different groups with a current housing problem.

7.39 Overall, using a 40% affordability threshold, around three-fifths of households with a current need are estimated to be likely to have insufficient income to afford market housing and so the estimate of the total current need is reduced to 2,146 households across Richmond Borough. The table below shows this information which is also split by broad category of current housing. The analysis shows that an estimated 484 of the households do not have housing – this is an important number within this analysis as it is this group who will need additional accommodation to be provided. The remaining households (1,661) have a need but if they were to move to alternative accommodation would free-up a home for use by another household (and hence no need for additional accommodation overall is required).

Table 44: Estimated Current Need by broad type of Current Accommodation

	In unsuitable housing (taken forward for affordability test)	% Unable to Afford	Revised Gross Need (including Affordability)
Households in housing	3,012	55.2%	1,661
No housing (homeless/concealed)	618	78.4%	484
Total	3,630	59.1%	2,146

Source: CLG Live Tales, Census (2011), data modelling and affordability analysis

7.40 The levels of need shown by this analysis can be compared with those on the Council's Housing Register. According to Local Authority Housing Statistics (LAHS) there were 4,101 households on the Housing Register in March 2015; of these some 1,258 were assessed by the Council to be a

reasonable preference category (i.e. having more acute needs). This latter figure is some way lower than the modelled estimate above (of 2,146) although this may to some degree reflect the availability of housing in the Borough and the possibility that many households with a need do not register with the Council due to believing that they have little hope of being housed.

Newly-Arising Need

7.41 To estimate newly-arising (projected future) need we have looked at two key groups of households based on the PPG. These are:

- Newly forming households; and
- Existing households falling into need.

Newly-Forming Households

7.42 The number of newly-forming households has been estimated through the demographic modelling with an affordability test also being applied. This has been undertaken by considering the changes in households in specific 5-year age bands relative to numbers in the age band below 5 years previously to provide an estimate of gross household formation. This differs from numbers presented in the demographic projections which are for net household growth. The numbers of newly-forming households are limited to households forming who are aged under 45 – this is consistent with 2007 SHMA Practice Guidance which notes after age 45 that headship (household formation) rates ‘plateau’. There may be a small number of household formations beyond age 45 (e.g. due to relationship breakdown) although the number is expected to be fairly small when compared with formation of younger households. No equivalent advice is provided in the PPG.

7.43 The estimates of gross new household formation have been based on outputs from the GLA Long-Term Projections – this to try to reflect need rather than a potentially constrained position if population growth is more closely linked to potential delivery. In looking at the likely affordability of newly-forming households we have drawn on data from previous surveys. This establishes that the average income of newly-forming households is around 84% of the figure for all households. This figure is remarkably consistent across areas (and is also consistent with analysis of English Housing Survey data at a national level).

7.44 We have therefore adjusted the overall household income data to reflect the lower average income for newly-forming households. The adjustments have been made by changing the distribution of income by bands such that average income level is 84% of the all household average. In doing this we are able to calculate the proportion of households unable to afford market housing without any form of subsidy (such as LHA/HB). The assessment suggests that overall around 45% of newly-

forming households will be unable to afford market housing and that a total of 944 new households will have a need on average in each year to 2033.

Table 45: Estimated Level of Affordable Housing Need from Newly Forming Households (per annum) – 40% affordability threshold

Area	Number of new households	% unable to afford	Total in need
Richmond	2,092	45.2%	944

Source: Projection Modelling/Income analysis

Existing Households falling into Affordable Housing Need

- 7.45 The second element of newly arising need is existing households falling into need. To assess this, we have used information from CoRe. We have looked at households who have been housed over the past two years – this group will represent the flow of households onto the Housing Register over this period. From this we have discounted any newly forming households (e.g. those currently living with family) as well as households who have transferred from another social rented property. An affordability test has also been applied (again based on 40% of income to be spent on housing).
- 7.46 This method for assessing existing households falling into need is consistent with the 2007 SHMA guide which says on page 46 that ‘Partnerships should estimate the number of existing households falling into need each year by looking at recent trends. This should include households who have entered the housing register and been housed within the year as well as households housed outside of the register (such as priority homeless household applicants)’. Again, no equivalent advice is provided in the PPG.
- 7.47 Following the analysis through suggests a need arising from 281 existing households each year through to 2033.

Supply of Affordable Housing

- 7.48 The future supply of affordable housing is the flow of affordable housing arising from the existing stock that is available to meet future need. It is split between the annual supply of social/affordable rent relets and the annual supply of relets/sales within the intermediate sector.
- 7.49 The Planning Practice Guidance suggests that the estimate of likely future relets from the social rented stock should be based on past trend data which can be taken as a prediction for the future. We have used information from the Continuous Recording system (CoRe) to establish past patterns of social housing turnover. Our figures include general needs and supported lettings but exclude lettings of new properties plus an estimate of the number of transfers from other social rented

homes. These exclusions are made to ensure that the figures presented reflect relets from the existing stock. Additionally, an estimate of the number of 'temporary' supported lettings have been removed from the figures (the proportion shown in CoRe as being lettings in direct access hostels or foyer schemes (of which there were very few in the Borough)).

7.50 On the basis of past trend data it has been estimated that 347 units of social/affordable rented housing are likely to become available each year moving forward.

Table 46: Analysis of past social/affordable rented housing supply (per annum – based on data for 2012-15 period)

	Total lettings	% as non-new build	Lettings in existing stock	% non-transfers	Sub-total	% non-temporary housing	Total lettings to new tenants
Richmond	631	83.1%	524	67.7%	355	97.9%	347

Source: CoRe

7.51 The supply figure is for social/affordable rented housing only and whilst the stock of intermediate housing in Richmond is not significant compared to the social/affordable rented stock it is possible that some housing does become available each year (e.g. resales of shared ownership). For the purposes of this assessment we have again utilised CoRe data about the number of sales of homes that were not new build. From this it is estimated that around 12 additional properties might become available per annum.

7.52 Finally, the analysis considers the pipeline supply of new affordable housing (i.e. housing with planning permission that can reasonably be expected to be provided). As of January 2016 there were a total of 289 affordable homes in the pipeline with permission granted. For the purposes of analysis this number has been annualised over the 19-year projection period to be consistent with other analysis – this is an equivalent annual supply of about 15 homes. In reality the pipeline over 19 years would increase with supply from other sites. The total supply of affordable housing is therefore estimated to be 375 per annum and is summarised in the table below.

Table 47: Supply of Affordable Housing

Area	Social/affordable rented relets	Intermediate housing 'relets'	Pipeline supply	Total supply (per annum)
Richmond	347	12	15	375

Source: CoRe/ Supply Analysis

Net Affordable Housing Need

7.53 The table below shows our overall calculation of affordable housing need. The analysis shows with a 40% affordability threshold that there is a need for 964 dwellings per annum to be provided – a total of 18,300 over the 19-year period (2014-33). This is in effect the level of affordable housing which would need to be provided if all households requiring financial support to meet their housing needs were to be allocated an affordable home, and land supply did not constrain population growth. In this context it is a relatively theoretical number.

Net Need = Current Need + Need from Newly-Forming Households + Existing Households falling into Need – Supply of Affordable Housing

Table 48: Estimated Annual Level of Affordable Housing Need

	Per annum	2014-33
Current need	113	2,146
Newly forming households	944	17,945
Existing households falling into need	281	5,336
Total Gross Need	1,338	25,427
Supply	375	7,118
Net Need	964	18,309

Source: Census (2011)/CoRe/Projection Modelling and affordability analysis

Sensitivity to Income Thresholds

7.54 The analysis in this section has look at affordable housing need using a threshold of affordability of 40% - this figure has been based on an understanding of the sort of figures which might be reasonable to use along with an analysis of the cost of housing locally. It is however recognised that a number of different assumptions could arguably have been used and so the analysis below briefly considers the implications of alternative thresholds. The data shows in particular, that with an assumption of households spending 25% gross income on housing costs need increases to 1,524 households per annum (up from 906 using a 40% threshold).

Table 49: Estimated level of Housing Need (per annum) at Variant Income Thresholds

	@ 25%	@ 30%	@ 35%	@ 40%
Backlog Need	152	137	124	113
Newly forming households	1,421	1,242	1,085	944
Existing households falling into need	325	312	297	281
Total Need (per annum)	1,899	1,691	1,506	1,338
Supply	375	375	375	375
Net Need	1,524	1,316	1,131	964

Source: Census (2011)/CoRe/Projection Modelling and affordability analysis

Relating Affordable Need and OAN – Legal Judgements and Guidance

7.55 The analysis above clearly indicates a need for affordable housing across the two HMAs and individual local authorities. However, the link between affordable need and the OAN is complex and has been subject to a number of recent High Court decisions. The Planning Advisory Service's Technical Advice Note on *Objectively-Assessed Need and Housing Targets* (2nd Edition, July 2015) also deals with this issue. Below we have summarised some of the key judgements and guidance in chronological order.

Satnam Millennium Limited v Warrington Borough Council (February 2015)

7.56 In this case, a challenge to the adoption of the Warrington Local Plan Core Strategy succeeded, resulting in the quashing of the Plan's housing provision policies. With regard to affordable housing the judge found that the assessment of full, objectively assessed needs for housing had not taken account of the (substantial) need for affordable housing.

7.57 In paragraph 43 of the judgement it is concluded that *'the Local Plan should then meet the OAN for affordable housing, subject only to the constraints referred to in the NPPF, paragraphs 14 and 47'*. This quote has been taken by some parties to imply that the need for affordable housing (as shown in modelling such as within the section) needs to be met in full – for example, if the affordable need is 200 per annum and delivery is likely to be 20% then an OAN for 1,000 homes would be appropriate.

7.58 It is not clear if this is exactly what the judge in this case had in mind. What is clear that such an approach in many areas would be impractical as it would require huge increases to have any significant impact.

Oadby and Wigston v Bloor Homes (July 2015)

7.59 In this case, a challenge by Oadby & Wigston Borough Council to the granting of planning permission through a Section 78 inquiry was dismissed.

7.60 The key issue in front of the Judge was whether or not the original inspector's adoption of a figure of 147 dwellings per annum as the full objectively assessed need for housing (FOAN) was sound. In essence the Council's position was that the need was in the range of 80-100 dwellings per annum and that this was a policy-off figure based on the most up-to-date population and household projections. The appellant suggested a need in the range of 147-161 based on long-term migration trends and the needs of the local economy (in terms of matching job growth and housing need).

- 7.61 The Judge's initial conclusion was that he considered the SHMA position (of 80-100 dwellings per annum) to be policy-on. He based this on a recognition that other analysis in the SHMA had indicated a need for 173 dpa to meet economic growth and a slightly lower figure (of 160 per annum) as the affordable housing need.
- 7.62 The uncertainty in this decision is whether or not the FOAN must include all of the affordable housing need. Some of the wording of the judgment would suggest that this was the case with Judge Hickinbottom stating that the assessment of need '*becomes policy on as soon as the Council takes a course of not providing sufficient affordable housing to satisfy the FOAN*'. This however is inconsistent with the more recent judgement in Kings Lynn (below) and also contrasts with the approach recommended in the PAS Technical Advice Note.

Planning Advisory Service – Technical Advice note (July 2015)

- 7.63 At about the same time as the Oadby & Wigston judgement, the Planning Advisory Service (PAS) published the second edition of their technical advice note on Objectively Assessed Need and Housing Targets – this replaced/updated a version from June 2014.
- 7.64 The consideration of affordable housing need and its relationship to overall housing need is covered in some detail within Section 9 of the document. PAS set out a suggested approach for looking at the relationship between OAN and affordable housing (which is broadly in line with the approach in this report) before going on to consider their own view about the relationship.
- 7.65 They initially suggest that affordable housing is “a policy consideration” that bears on housing targets rather than OAN and note that they are not comparable because they relate to different meanings of the term “need.” They also highlight that the OAN relates to new dwellings whereas much of the affordable need relates to existing households, who, when moving, would free up dwellings to be occupied by other households.
- 7.66 PAS conclude that there is no arithmetical way of combining the OAN (calculated through demographic projections) and the affordable need before concluding that the affordable need cannot be a component part of the OAN. PAS do however note that their views ‘may be’ contradicted by the Satnam judgement referred to above.

Kings Lynn v Elm Park Holdings (July 2015)

- 7.67 The final case of reference is Kings Lynn and West Norfolk Council vs. SSCLG and Elm Park Holdings. The case involved the Council's challenge to an inspector's granting of permission for 40

dwellings in a village. Although much of the case was about the approach to take with regards to vacant and second homes, the issue of affordable housing was also a key part of the final judgment.

- 7.68 Focussing on affordable housing, Justice Dove considered the "ingredients" involved in making a FOAN and noted that the FOAN is the product of the Strategic Housing Market Assessment (SHMA) required by paragraph 159 of the NPPF. It is noted that the SHMA must identify the scale and mix of housing to meet household and population projections, taking account of migration and demographic change, and then address the need for all housing types, including affordable homes.
- 7.69 He continued by noting that the scale and mix of housing is *'a statistical exercise involving a range of relevant data for which there is no one set methodology, but which will involve elements of judgement'*. Crucially, in paragraph 35 of the judgment he says that the *'Framework makes clear that these needs [affordable housing needs] should be addressed in determining the FOAN, but neither the Framework nor the PPG suggest that they have to be met in full when determining that FOAN. This is no doubt because in practice very often the calculation of unmet affordable housing need will produce a figure which the planning authority has little or no prospect of delivering in practice'*. This is an important point, given the previous judgements in Satnam and Oadby & Wigston. And indeed in relation to Oadby and Wigston he notes that *'Insofar as Hickinbottom J in the case of Oadby and Wigston Borough Council v Secretary of State [2015] EWHC 1879 might be taken in paragraph 34(ii) of his judgment to be suggesting that in determining the FOAN, the total need for affordable housing must be met in full by its inclusion in the FOAN I would respectfully disagree. Such a suggestion is not warranted by the Framework or the PPG'*.
- 7.70 Therefore, this most recent judgement is clear that an assessment of affordable housing need should be carried out, but that the level of affordable need shown by analysis does not have to be met in full within the assessment of the FOAN.
- 7.71 The approach in Kings Lynn is also similar to that taken by the inspector (Simon Emerson) to the Cornwall Local Plan. His preliminary findings in June 2015 noted in paragraph 3.20 that *'National guidance requires consideration of an uplift; it does not automatically require a mechanistic increase in the overall housing requirement to achieve all affordable housing needs based on the proportions required from market sites.'*

Relating Affordable Need and OAN

- 7.72 The analysis above indicates a clear need for affordable housing. The assessed affordable need of 964 dwellings per annum represents 92% of the demographic projection linked to the GLA long-term trends and a much higher figure of 343% if linked to the GLA SHLAA projections (CLG). It

provides a clear basis for seeking to maximise affordable housing delivery. These figures are however calculated in different ways and are not strictly comparable.

7.73 The Planning Practice Guidance sets out how it expects the affordable housing need to be considered as part of the plan-making process. It outlines in Paragraph 029 that:

“The total affordable housing need should be considered in the context of its likely delivery as a proportion of mixed market and affordable housing developments, given the probable percentage of affordable housing to be delivered by market housing led developments. An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.”

7.74 The likely delivery of affordable housing on mixed market housing-led developments will be influenced both by affordable housing policies (themselves influenced by development viability evidence), the mix of homes which are delivered and the viability of individual development schemes. Some schemes will not be able to viably deliver policy-compliant levels of affordable housing.

7.75 It should be borne in mind that besides delivery of affordable housing on mixed-tenure development schemes, there are a number of other mechanisms which deliver affordable housing in Richmond. These include:

- Mayoral Affordable Housing Programme – this (administered by the GLA) provides funding to support Registered Providers in delivering new housing including on sites owned by RPs. The Council also supports RPs to access other specialised funding streams such as the Government’s Estate Regeneration Fund;
- Empty Homes Programmes – where local authorities can bring properties back into use as affordable housing. These are existing properties, and thus represent a change in tenure within the current housing stock

7.76 As Richmond upon Thames Council transferred its housing stock in 2000, the Council’s role is to work in partnership with Registered Providers. The Council supports delivery of general needs housing through the following main sources:

- Affordable housing secured by legal agreement in schemes that are granted planning permission.
- Small scale schemes or larger scale regeneration by Registered Providers on their land holdings.
- Purchase and repair of properties on the open market for use as affordable housing.
- Disposal of its own land and other assets.

7.77 The Council’s Housing Capital Programme is used to support delivery of affordable housing in the Borough. The Housing Capital Programme is funded from a number of sources such as prudential borrowing, S106 financial contributions for affordable housing, New Homes Bonus and grant

funding. A Housing Capital Programme for 2015/16 - 2020/21 totalling almost £20m has recently been agreed.

- 7.78 Funding for specialist forms of affordable housing, such as extra care provision, may also be available from other sources; whilst other niche agents, such as Community Land Trusts, may deliver new affordable housing. Net changes in affordable housing stock may also be influenced by estate regeneration schemes, as well as potentially by factors such as the proposed extension of the Right to Buy to housing association properties. Affordable housing can be met by changes in the ownership of existing housing stock, not just by new-build development.
- 7.79 In interpreting the relationship between affordable need and total housing provision, it is important to understand the basis of the affordable housing needs model. As the Planning Practice Guidance sets out, the calculation of affordable need involves *“adding together the current unmet housing need and the projected future housing need and then subtracting this from the current supply of affordable stock.”* The affordable housing need does therefore not represent an assessment of what proportion of additional households might require affordable housing. Instead the model considers:
- What need can be expected to arise from both existing and newly-forming household who require financial support to access suitable housing;
 - This is then compared with the projected supply of affordable housing expected to arise from the turnover of existing stock, and affordable housing in the development pipeline.
- 7.80 The affordable housing model thus includes supply-side factors. The net need figures derived are influenced by the current stock of affordable housing and turnover of this. This has been influenced by past policies and investment decisions (at both the national and local levels). Funding mechanisms for affordable housing have influenced past delivery, which in turn influence the need today.
- 7.81 In the case of Richmond, the stock of affordable housing (social rented) represents about 13% of the total number of households – this is notably below the equivalent figure for London (24%) and England (18%). This has affected the level of affordable housing need and the Private Rented Sector has in effect taken on an increasing role in providing housing for households who require financial support in meeting their housing needs, supported by Local Housing Allowance.
- 7.82 Whilst the Private Rented Sector (PRS) does not fall within the types of affordable housing set out in the NPPF ‘for planning purposes’, it has evidently been playing a role in meeting the needs of households who require financial support in meeting their housing need. Government recognises this, and indeed legislated through the 2011 Localism Act to allow Councils to discharge their “homelessness duty” through providing an offer of a suitable property in the PRS.

- 7.83 It is also worth reflecting on the NPPF (Annex 2) definition of affordable housing. This says: *'Affordable housing: Social rented, affordable rented and intermediate housing, provided to eligible households whose needs are not met by the market'* [emphasis added]. Clearly where a household is able to access suitable housing in the private rented sector (with or without Housing Benefit) it is the case that these needs are being met by the market (as within the NPPF definition). As such the role played by the private rented sector should be recognised – it is evidently part of the functioning housing market.
- 7.84 Data from the Department of Work and Pensions (DWP) has been used to look at the number of LHA supported Private Rented Homes. As of August 2015 it is estimated that there were around 2,806 benefit claimants in the Private Rented Sector.
- 7.85 From English Housing Survey we estimate that the proportion of households within the private sector who are “new lettings” each year (i.e. stripping out the effect of households moving from one private rented property to another) is around 13%. Applying this to the number of LHA claimants in the Private Rented Sector gives an estimate of around 365 private sector lettings per annum to new LHA claimants in the Borough. This serves to illustrate that there is some flexibility within the wider housing market.
- 7.86 However, national planning policy does not specifically seek to meet the needs identified through the Basic Needs Assessment Model through the Private Rented Sector. Government’s benefit caps may reduce the contribution which this sector plays in providing a housing supply which meets the needs of households identified in the affordable housing needs model herein. In particular future growth in households living within the PRS and claiming LHA cannot be guaranteed.
- 7.87 Secondly, and perhaps more critically, it is important to recognise that the model includes needs arising from both new households and existing households. Part of the needs included are from households who might require an additional home, such as:
- Newly-forming households;
 - Those in temporary accommodation;
 - Concealed households; and
 - Homeless households.
- 7.88 But the figures also include needs arising from households who will require a different form of home, but who – by moving to another property – would release an existing property for another household. These households do not generate a need for more dwellings overall. They include households who need to move as they are:
- Overcrowded;
 - Coming to the end of a tenancy;

- Living in unsuitable housing; and
- Cannot afford to remain in their current home.

7.89 Such households do not generate a net need for additional homes, as by moving they would release a home for other households. On this basis, these elements of the affordable housing need are not directly relevant to considering overall housing need and housing targets (which are typically measured in terms of net dwellings).

7.90 In considering the overall need for housing, only those who are concealed or homeless would be likely to result in an additional need for housing. The modelling undertaken indicates that there are 484 concealed and homeless households, the needs of which might be considered 'additional' to those in the demographic modelling undertaken. Numbers of newly-forming households in the modelling are established specifically from the demographic projections.

7.91 On balance, the analysis undertaken provides limited evidence to justify considering an adjustment to the (unconstrained) assessed housing need. However, the levels of affordable need are high enough that the Council should seek to deliver as much affordable housing as possible (subject to issues such as viability).

Richmond Housing Register

7.92 To inform the SHMA, GL Hearn were provided with waiting list data from the Councils Housing Register (as of the 1st March 2016) and also nominations data about past lettings (going back over the past 5-years to the end of 2015). Such data is often of use in assessing affordable needs, both demand and supply. The Council uses a points system to work out the priority of each housing application received, and adjusts the number of 'live' applications to broadly match the availability of homes. Whilst such an approach is logical in terms of allocating homes, the way in which the Register is maintained means it is of more limited use because it is difficult to definitively establish the level of need from this source.

7.93 Additionally, it should be noted that in areas with a fairly restricted supply of affordable homes (as is the case in Richmond) that the Register may not fully reflect needs – if for example households do not join the register due to a perception that they are unlikely to be housed.

7.94 However, the points system used and data available does mean that a good understanding of the profile of needs can be established – this issue is largely dealt with in Section 9 (where the report looks at the sizes of homes needed). In this section, current affordable needs are established through a range of secondary data sources (including Census data) with only a brief comment to overall compare with Register data.

Allocations Policy

7.95 The Richmond Housing Allocations Policy, implemented since May 2013, sets out the range of criteria against which applicants score points. The higher the points scored, the higher the assessed level of need and therefore households have a greater chance of being housed (or rehoused). Below is a brief summary of the points system used:

- Homelessness or threats with homelessness – 50 points plus additional points if living in temporary accommodation and the length of time in temporary accommodation (up to a maximum of 900 points). Points are awarded to rough sleepers (80 points)
- Medical needs – applicants can be awarded up to 200 points for medical needs (in circumstances such as terminal illness)
- Welfare/social needs – applicants can be awarded up to 200 points in this category although the awards are more typically for 50 points (issues include violence and harassment with child protection and adult safeguarding issues potentially attracting higher points scores (of 100 points)
- Property defects – typically 10 points but up to 50 or 200 where the property is in serious disrepair or is considered to be uninhabitable
- Lacking or sharing facilities – a range of points from 5 to 15 depending on what is shared or lacking
- Overcrowding – 50 points for each extra bedroom required plus additional points of up to 20 depending on the ages of children and the size of bedrooms
- Separated families – up to 40 points
- Age – older people can be awarded up to 30 extra points (for those aged 80 and over)
- Pregnancy – 5 points
- Low income and savings – 5 points for each
- Working households – receive 80 points
- Community contribution – including voluntary work is an additional 50 points (but not in addition to any points awarded for working)
- Local connection – 100-200 points for living in the Borough, working in the Borough or with exceptional circumstances requiring them to live in the Borough

7.96 Clearly there are a range of different ways in which applicants attract points and the analysis below does not seek to determine what the 'threshold' for need should be although some general description of how the Register data compares with the modelled estimates of need is provided below.

Comparison with modelled estimates of current need

7.97 Overall the analysis through secondary data sources suggests a current need from around 2,150 households (excluding households currently living in affordable housing). This figure compares initially with 4,862 households on the Housing Register, a figure which is reduced to around 4,000 once current affordable housing tenants are excluded. Of these only about 488 are considered by the Council as 'live' and therefore potentially likely to be provided with housing.

If it were accepted that the number in need is around 2,150 (i.e. consistent with the secondary data analysis) then this would be an equivalent level to a household accruing around 210 points through the allocations system used by the Council.

Affordable Housing Need: Implications

- An assessment of affordable housing need has been undertaken which is compliant with Planning Practice Guidance to identify whether there is a shortfall or surplus of affordable housing in Richmond.
- Overall, in the period from 2014 to 2033 a net deficit of 964 affordable homes per annum is identified (based on a 40% affordability threshold). There is thus a requirement for new affordable housing in the Borough and the Council is justified in seeking to secure additional affordable housing contributions from all sites.
- The identified affordable housing need represents 92% of the need arising through the demographic projections (and a higher figure if linked to the SHLAA). However, in considering this relationship, it is important to bear in mind that the affordable housing needs model includes existing households who require a different size or tenure of accommodation rather than new accommodation per se.

8 HOUSING MARKET CONDITIONS AND MARKET SIGNALS

8.1 In line with the Planning Practice Guidance, we have sought to analyse in detail the housing market dynamics. This section, initially reviews housing market dynamics including national and macro-economic drivers. This is then developed at a borough and London wide level with quantitative analysis of local prices, sales volumes and affordability.

8.2 This section also presents findings from the detailed engagement process which GL Hearn has undertaken with estate and letting agents in the Borough to understand current housing market dynamics 'on the ground.'

Conceptual Framework

8.3 It is important to understand that the housing market is influenced by macro-economic factors, as well as the housing market conditions at a regional and local level. There are a number of key influences on housing demand, which are set out in the diagram below:

Figure 35: Understanding Housing Demand Drivers



Source: GLH

8.4 At the macro-level, the market is particularly influenced by interest rates and mortgage availability, as well as market sentiment (which is influenced by economic performance and prospects at the

macro-level). In the recent recessionary period, these macro conditions have been particularly prominent in driving the housing market.

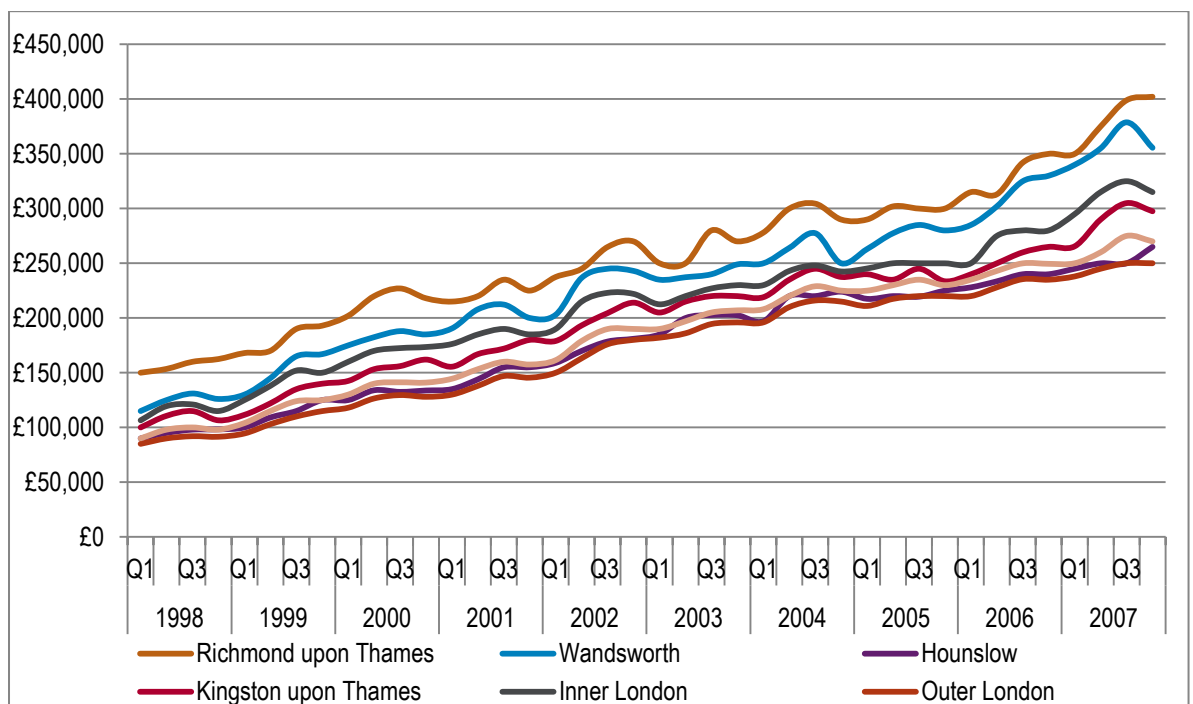
- 8.5 The market is also influenced by the economy at both regional and local levels, recognising that economic employment trends will influence migration patterns (as people move to and from areas to access jobs) and that the nature of employment growth and labour demand will influence changes in earnings and wealth (which influences affordability).
- 8.6 Housing demand over the longer-term is particularly influenced by population and economic trends: changes in the size and structure of the population directly influence housing need and demand, and the nature of demand for different housing products.
- 8.7 There are then a number of factors which play out at a more local level, within a functional housing market and influence demand in different locations. The importance of these local factors is perhaps more pronounced in stable or healthy economic times, when mortgage availability and market liquidity are far less of a constraint on activity. Local factors include:
- quality of place and neighbourhood character;
 - school performance and the catchments of good schools;
 - the accessibility of areas including to employment centres (with transport links being an important component of this); and
 - the existing housing market and local market conditions.
- 8.8 These factors influence the demand profile and pricing within the market. At a local level, this often means that the housing market (in terms of the profile of buyers) tends to be influenced and consequently reinforce to some degree the existing stock profile. However, regenerative investment or delivery of new transport infrastructure can influence the profile of housing demand in a location, by affecting its attractiveness to different households.
- 8.9 Local housing markets or sub-markets are also influenced by dynamics in surrounding areas, in regard to the relative balance between supply and demand in different markets; and the relative pricing of housing within them. Understanding relative pricing and price trends is thus important.

Local Demand Indicators and Market Signals

House Price Change

- 8.10 Figure 36 profiles house prices across London Borough of Richmond upon Thames, adjoining boroughs and Inner and Outer London wide areas from 1998 to 2007 (i.e. the pre-recession decade). This shows a steady upward trend in all areas over this period. Over this period the median house price in the London Borough of Richmond upon Thames grew from £150,000 in Q1 1998 to £349,950 in Q1 2007 – a growth of £199,950 (133% growth over the 9 year period). By comparison the average growth across Inner London was £188,450 (177%) and Outer London was £153,000 (180%), while there was a £160,000 (178%) across London. In absolute terms, house price growth has exceeded London and Outer London averages over the longer-term.
- 8.11 House price growth in LB Richmond over this period have also been higher than most of the neighbouring areas. Median house prices increased by £224,975 (196%) in Wandsworth, by £155,028 (172%) in Hounslow and by £165,500 (166%) in Kingston upon Thames. Richmond has highest median house prices upon Q1 2007, at £349,950. This is compared to Wandsworth (£339,975), Hounslow (£245,000), Kingston upon Thames (£265,500), Inner London (£294,950) and Outer London (£238,000).

Figure 36: Quarterly Median House Prices (1998- 2007)

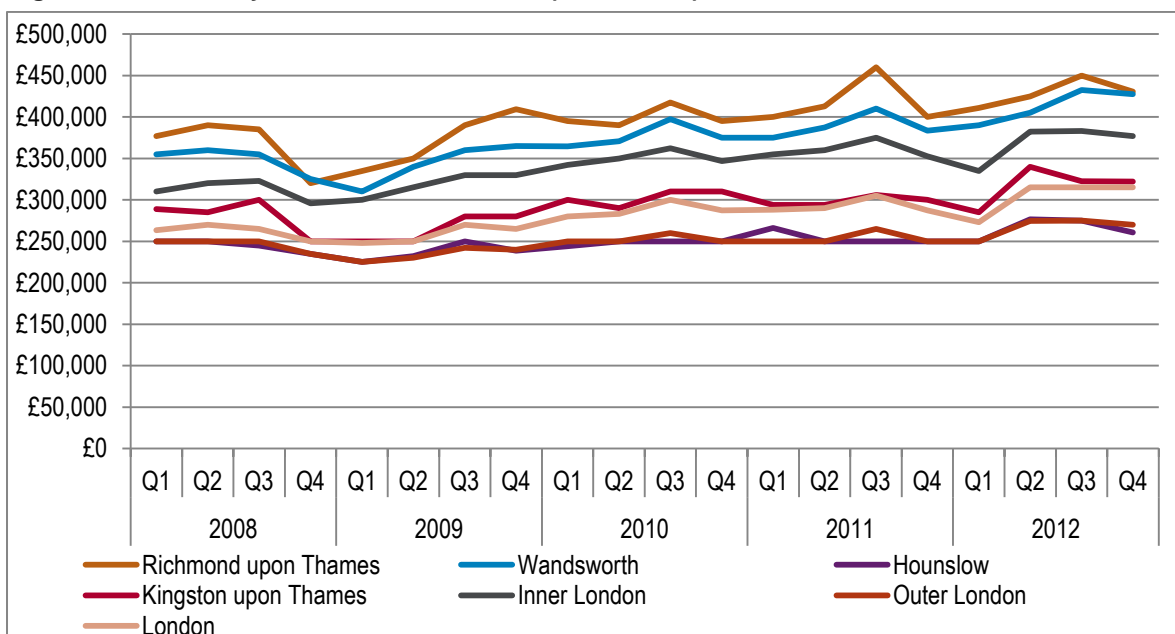


Source: GLH Analysis: Land Registry Price Paid Data

8.12 Figure 37 shows quarterly growth in median house prices between 2008 and 2012 (a recessionary period)/ period of subdued market conditions. The graph below shows a decrease in prices in first half of 2008 and a subsequent rebound at the beginning of 2009. The Borough experience a notable fall in median house prices, a decrease by 16.9% between Q3 and Q4 2008. This can be compared to Wandsworth (-8.5%), Hounslow (-4.1%), Kingston upon Thames (-16.7%), Inner London (-8.4%) and Outer London (-6%).

8.13 Although prices fell in 2008-9, median house prices have grown by 35% in LB Richmond over the five year period 2008- 2012. This was the highest increase across all of the areas under consideration, and compares to a 32% increase in Wandsworth, 11% increase in Hounslow and 29% in Kingston-upon-Thames. Comparing the above figures to the London trends, it can be observed that Richmond, Wandsworth and Kingston noted higher growth than boroughs within Inner London (27%), Outer London (15%) and across the City (26%) over the recessionary period.

Figure 37: Quarterly Median House Prices (2008- 2012)

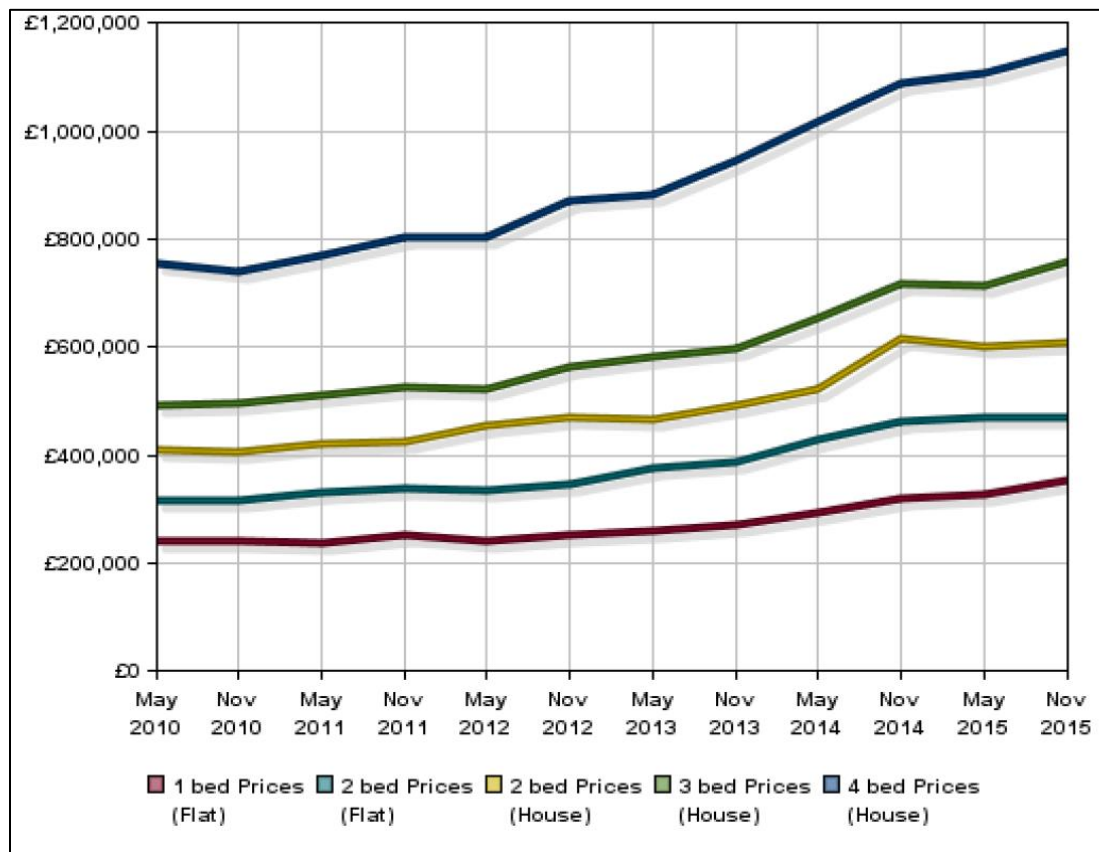


Source: GLH Analysis: Land Registry Price Paid Data

8.14 Figure 38 shows a detailed breakdown of the average house prices between 2010 and 2015 by bed count and type of the property across the London Borough of Richmond upon Thames. Average values have increased by 33% across of all of the types of properties. In general, there are small differences in the average growth in the price of different sizes of properties. The highest rate of growth has been for 3 bedroom houses (34.8%), suggesting a stronger difference between supply and demand. It is followed by 32.6% increase in 2 bedroom flats and houses. The slowest growth

can be observed for 1 bed flats where capital values increased by 32.2% over the 5 year period. Differences between percentage growth rates by type overall re relatively marginal.

Figure 38: Price Trends by Type and Size, LB Richmond (2010-2015)

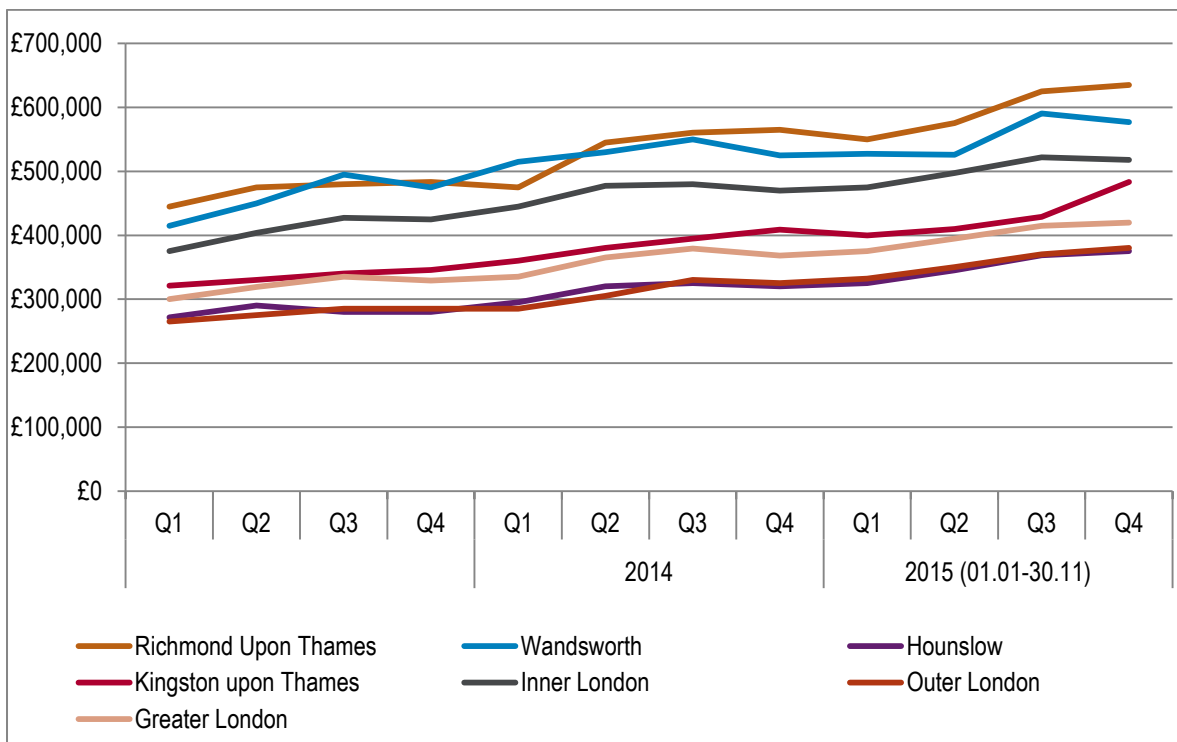


Source: *Hometrack: Housing Intelligence System*

8.15 Figure 39 provides an overview of median house price changes over the last three years (2013 to 2015). Data used in this figure shows house prices up to end of November 2015. All of the areas noted a substantial increase in the median house price values over this period. The highest growth was observed in Kingston, where prices increased by 51% in the last three years, followed by Richmond (43%), Wandsworth (39%) and Hounslow (38%). In case of City-wide trends, Inner London boroughs noted a 38% increase, Outer London ones 43% growth and Greater London saw a 40% growth in a 3 year period.

8.16 The overall picture seems to suggest price growth been influenced by movement of households from Inner to Outer London Boroughs which are relatively more affordable. The lower relative growth in LB Richmond is likely to have been influenced by its relatively higher housing costs compared to other Outer London Boroughs.

Figure 39: Quarterly Median House Prices (2013-2015)

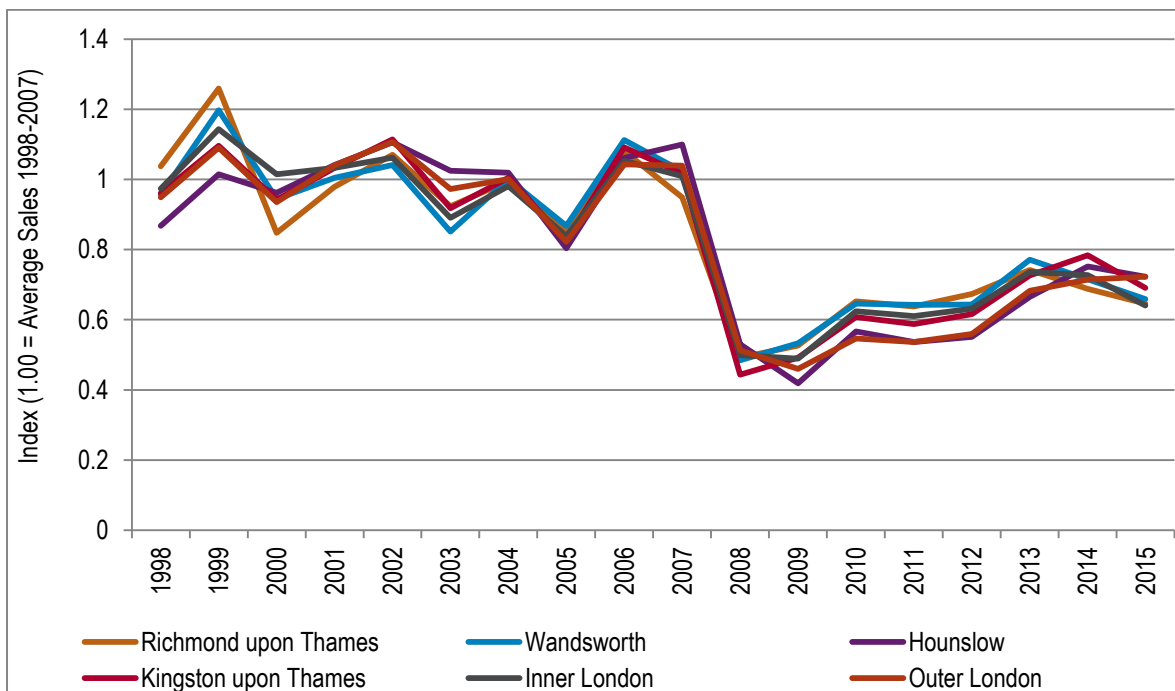


Source: GLH Analysis: Land Registry Price Paid Data

Sales Volumes and Effective Demand

- 8.17 Sales are an important indicator of effective demand for market housing. We have benchmarked sales performance against long-term trends to assess relative demand. Figure 40 benchmarks annual sales across authority, region and national levels and compares areas over the period of 1998 to 2014. It uses an index where 1.00 is the average annual sales over the 1998-2007 pre-recessionary period.
- 8.18 As seen in the figure below, the impact of the recession was experienced across all geographical areas with sales volumes experiencing a significant drop between 2007 and 2008. Following the recessionary slump, sales volumes have remained well below pre-recession levels, yet, relative to the figures from 2012 and earlier, the rate of recovery is accelerating.
- 8.19 Comparing the benchmarked values, it can be seen that the levels of sales in 2015 in Richmond upon Thames and Kingston upon Thames recovered to 68% of its pre-recessionary (2007) values. This is one of the strongest recoveries across the boroughs under consideration (no doubt as the market is less influenced by younger buyers without significant equity). In comparison, Wandsworth recovered only to 64% while Hounslow to 66%, Inner London sales levels recovered to 63% of the 2007 values, while Outer London values marked a 70% recovery.

Figure 40: Indexed Analysis of Sales Trends (1998-2015)

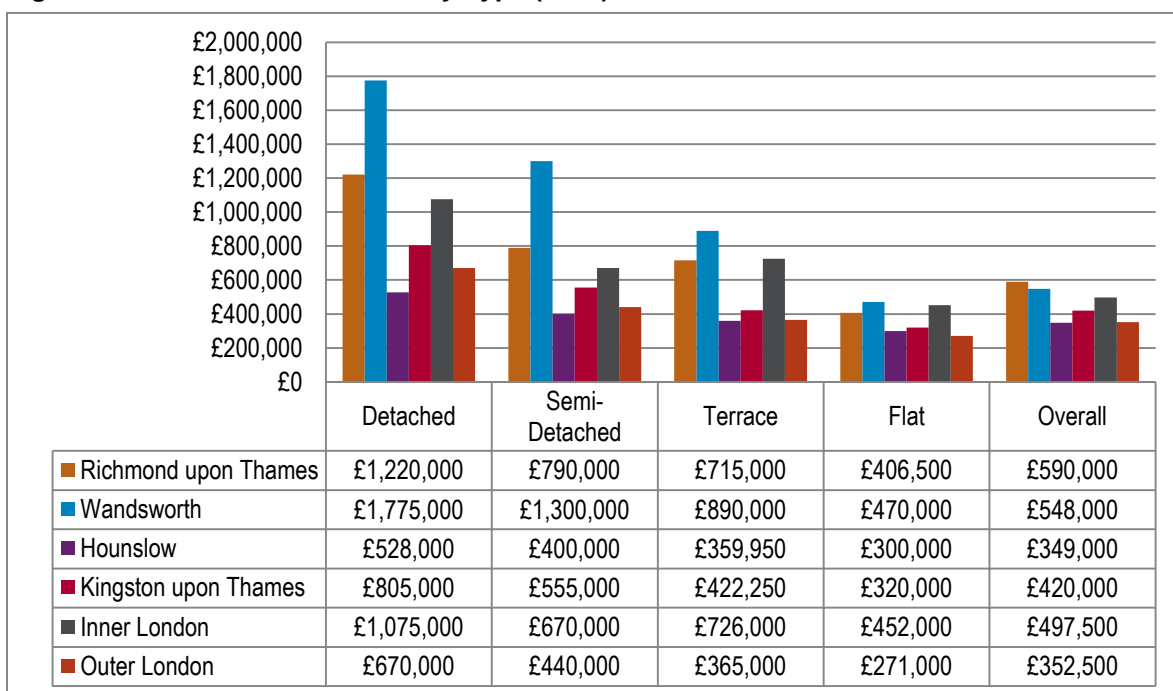


Source: GLH Analysis: Land Registry Price Paid Data

- 8.20 Figure 41 below provides a breakdown of median house prices by type. It used data on sales to November 2015. The median value of detached houses sold was £1,220,000. This is below the values in Wandsworth (£1,775,000) however significantly above the values for Hounslow (£528,000), Kingston (£805,000), Inner (£1,075,000) and Outer London (£670,000). This end of the market is more similar to Inner London.
- 8.21 The most expensive semi-detached households can be in Wandsworth (£1,300,000) and Richmond (£790,000). Both boroughs have substantially higher median house prices for this type of property. In comparison, median value for a semi-detached property in Hounslow is £400,000, in Kingston, £670,000 across Inner London and £440,000 in Outer London. Lower prices relative to LB Wandsworth is likely an influence on migration to LB Richmond.
- 8.22 In terms of the terraced properties, once again highest median values can be found in Wandsworth (£890,000) and Richmond upon Thames (£715,000). At the borough level, these are followed by Kingston upon Thames (£422,250) and Hounslow (£395,950). In terms of the Inner London (£726,000) values, these are higher than in most of the above areas. Outer London values are substantially lower, with median price for a terraced properties being £365,000.

- 8.23 Analysis of median house prices for flats shows that the highest values for these properties across the boroughs can be found in Wandsworth (£470,000) and Richmond upon Thames (£406,500). These are followed by Kingston upon Thames (£320,000) and Hounslow (£300,000).
- 8.24 In terms of the overall values, Richmond upon Thames (£590,000) has the highest median house value across all of the areas under consideration. It is followed by Wandsworth (£548,000). Both areas are above the Inner and Outer London (£352,500) values but substantially exceed the figures for neighbouring boroughs. The overall median house price in Hounslow is £349,000 and £420,000 in Kingston upon Thames.
- 8.25 The house price analysis suggests that the market in the Borough is more closely related to higher value Inner London than a number of neighbouring areas. There is a significant price differential relative to Hounslow and Kingston (with properties in the Borough being on average more expensive). Values for larger properties are however lower than in Wandsworth.

Figure 41: Median House Prices By Type (2015)



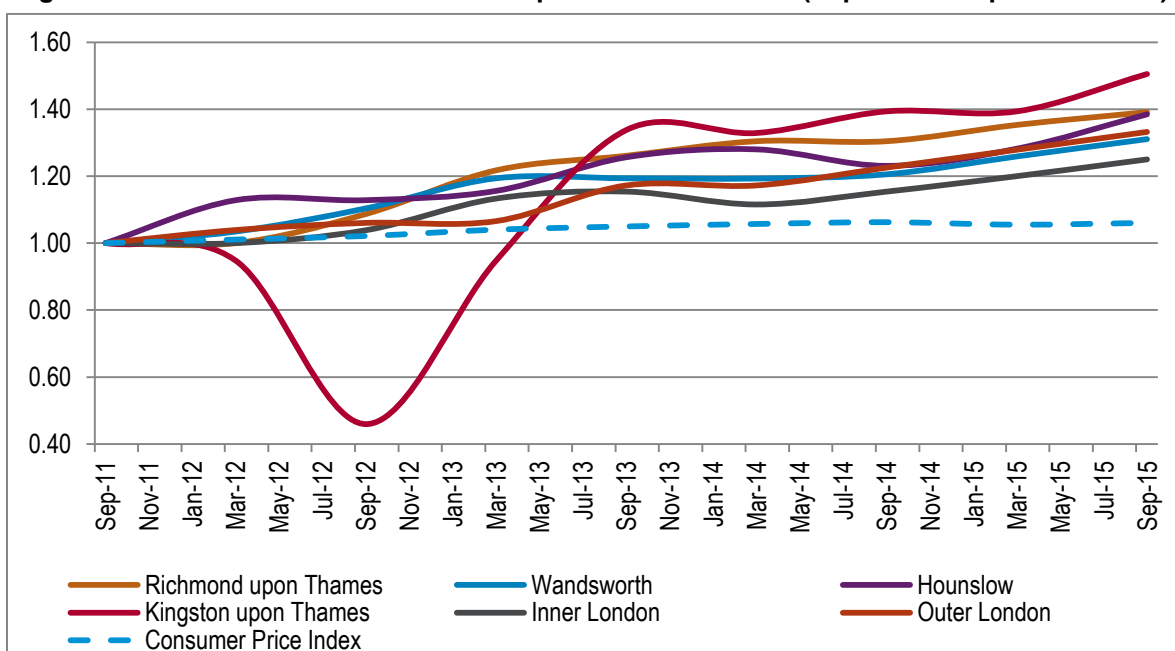
Source: GLH Analysis: Land Registry Price Paid Data

- 8.26 The most recent VOA private rental data (over the year to September 2015) shows the median rental price in Richmond upon Thames was £1,600 per calendar month (pcm). This compares to an average of £1,647 pcm in Wandsworth, £1,350 pcm in Hounslow, £1,350 pcm in Kingston upon Thames, £1,650 in Inner London and £1,250 pcm across the Outer London area. Rental costs on average are similar to Inner London and Wandsworth.

8.27 Figure 42 shows the median rental values benchmarked to September 2011 values. Also shown is the Consumer Price Index (CPI). This shows a 39% growth in private rental values across Richmond upon Thames between 2011-15. This rate of growth is followed by Wandsworth (31% increase) and Hounslow (38%). The highest rate of increase can be observed in Kingston upon Thames, with 51% growth between September 2011 and September 2015. Inner London boroughs noted a 25% growth, while Outer London a 33% one.

8.28 Strong rental growth has been evident over the last four years, indicating supply/demand imbalance for rented properties in the Borough.

Figure 42: Benchmarked trend in median private rental values (Sep 2011 – September 2015)

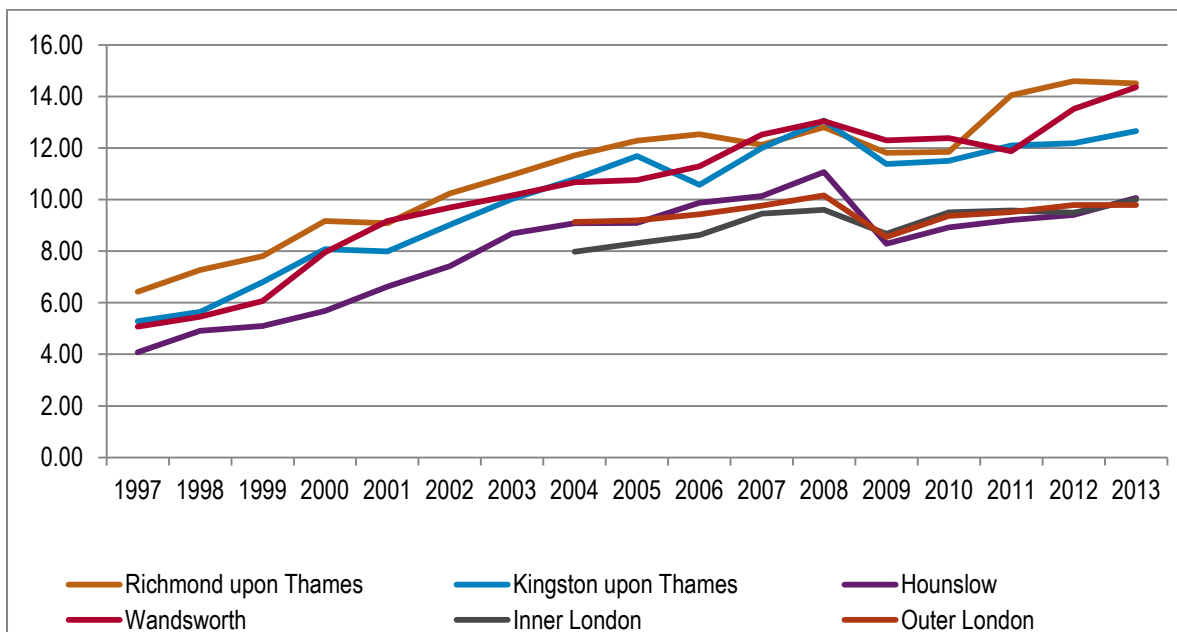


Source: VOA Private Rental Data

Affordability of Market Housing

8.29 We have considered evidence of affordability by looking specifically at the relationship between lower quartile house prices and lower quartile earnings. As of 2013, the lower quartile house prices in Richmond upon Thames are 14.5 higher than lower quartile earnings what appear to be the highest values across all of the areas under consideration. It is followed by Wandsworth (14.36), Kingston upon Thames (12.66) and Hounslow (10.07). All of the above areas have higher ratios of lower quartile house price to lower quartile earnings than the Inner (10.00) and Outer London (9.79) areas. Data for Inner and Outer London covers the period from 2004 to 2013.

Figure 43: Lower Quartile Affordability Trend (1997- 2013)



Source: VOA Private Rental Data

8.30 Table 50 compares the lower quartile affordability ratio to the median price-earnings ratio to identify whether affordability is an issue across the market or within a particular segment. In Richmond upon Thames the median ratio is 0.5 below the lower quartile figure indicating that affordability pressures are even more acute at the lower end of the market. A similar trend can be seen in case of Wandsworth (-0.08) and Inner London (-0.40), where the difference between lower quartile and median ratio is also negative. For Hounslow (0.59), Kingston upon Thames (0.81) and Outer London (0.69), lower quartile affordability ratio is slightly higher than the median ratio.

Table 50: Comparison of Lower Quartile and Median Affordability (2013)

	Lower Quartile Ratio	Median Ratio	Difference
Wandsworth	14.36	14.44	-0.08
Hounslow	10.07	9.48	0.59
Kingston upon Thames	12.66	11.86	0.81
Richmond upon Thames	14.50	15.01	-0.50
Inner London	10.00	10.41	-0.40
Outer London	9.79	9.10	0.69

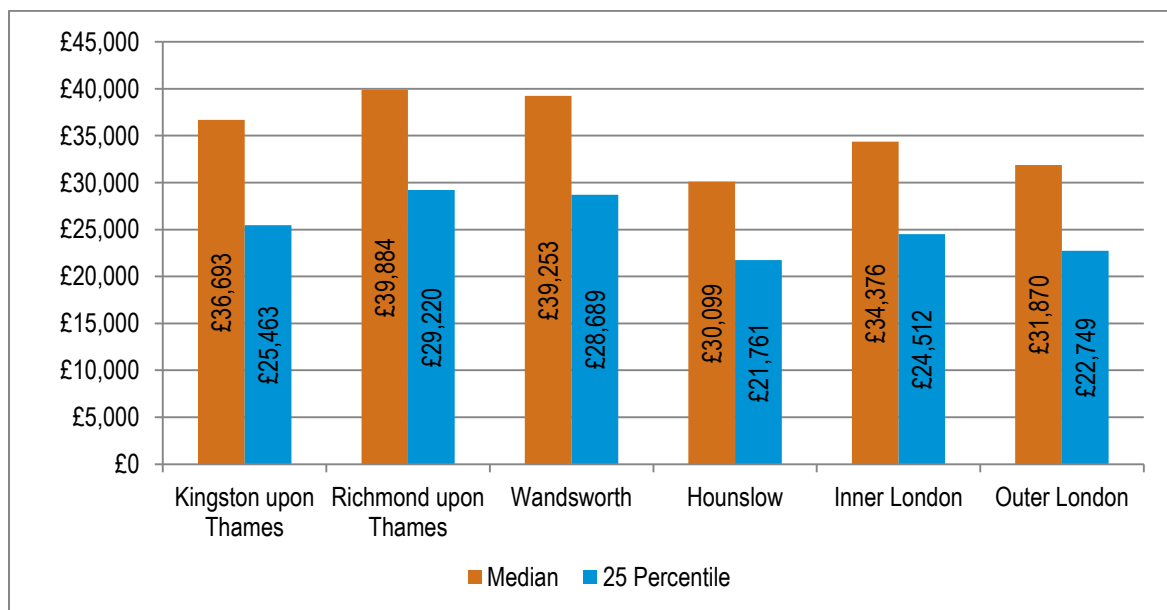
Source: DCLG Housing Market Live Tables

8.31 Affordability is influenced by house prices and earnings. Figure 44 compares the median and lower quartile gross annual earnings by place of residence. The median annual (gross) earnings (for individuals in work) in Richmond upon Thames are £39,884 per annum with the lower quartile being £29,220. These are the highest figures across all of the areas considered. It is followed by Wandsworth, where the median income is £39,253 and lower quartile of £28,689. The lowest

incomes can be found in Hounslow, where median salaries are £30,099 and lower quartile is £21,761.

8.32 The above data suggests that the lack of affordability is driven in particular by high housing costs.

Figure 44: Gross Annual Earnings of Full-time Workers by Place of Residence (2015)



Source: Annual Survey of Hours and Earnings

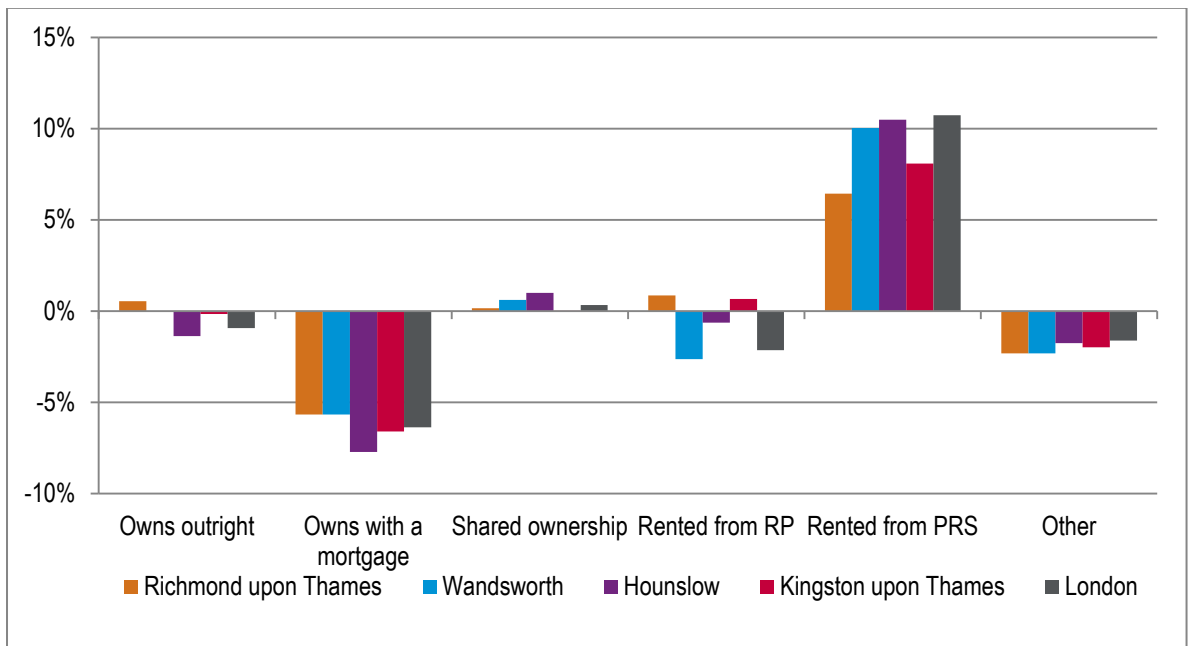
8.33 Nationally, a combination of the deteriorating affordability of market homes, restricted access to mortgage products and a lack of social housing supply over the 2001-11 decade has resulted in fewer households being able to buy and increased pressures on the existing affordable housing stock. This has resulted in strong growth in the private rented sector as households are being forced to rent for longer. This is illustrated in Figure 45. Between 2001 and 2011 there was a 0.9 percentage point decrease in owns outright category across London. Richmond is the only area that noted a small increase (0.5pp) which may reflect the large cohort of over 65's who own their property outright in the Borough.

8.34 Nevertheless, there has been a substantial decrease in ownership of properties with a mortgage or loan across all of the areas. The highest decrease can be observed in Wandsworth (-7.7pp), followed by Kingston upon Thames (6.6pp), Richmond upon Thames (5.7pp) and Wandsworth (5.7pp). This can be compared to 6.4pp decrease in ownership of a property with a mortgage or loan across London. A tenure shift from home ownership to renting is evident nationally, and particularly in London. It seems likely that this will continue.

8.35 There was a marginal increase in shared ownership across most of the areas, with Richmond noting a 0.2pp growth in the category.

8.36 Private renting grew significantly in all areas. The highest increase was across London (10.7pp), followed by Hounslow (10.5pp), Wandsworth (10.0pp) and Kingston upon Thames (8.1pp). Richmond upon Thames (6.4pp) had the smallest change across the areas under consideration. The evidence points to particular demand from family households looking to buy property.

Figure 45: Changes in Tenure (2001-2011)



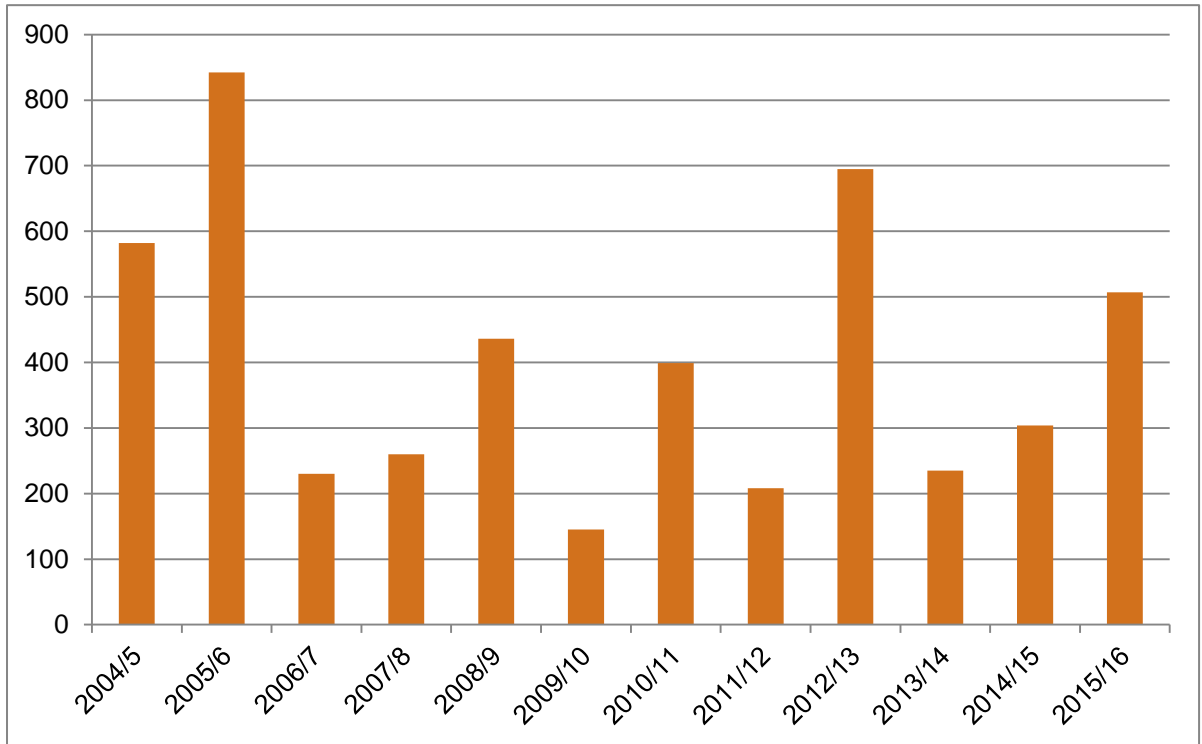
Source: Census 2011

Completions

8.37 Since 2004/5 net completions in the Borough have numbered 4,843 units and averaged 404 dpa. From 2005/6 there’s has been a notable and sustained reduction in delivery. There was a notable upturn in 2012/13 although this dropped off again the following year.

8.38 While in the last three years there has been year on year growth this is still below the 2005/6 peak. Although the most recent year was above the London Plan target for the Borough.

Figure 46: Housing Completions in LB Richmond (2004-16)



Source: Council monitoring data

Implications

It is clear that the Borough, as with London overall, is a relatively unaffordable place to live. House prices grew significantly prior to the recession; and have continued to grow since 2009. They have grown by a third in five years (2010-15). There is evidence that rental costs have increased very substantially over the period since 2011 as well. In general, LB Richmond is the highest priced outer London borough.

Increases in sales prices have made it more difficult for younger households to buy a home – and this is borne out in significant increase in demand for private renting. The growth in rents suggests that supply – as for homes for sale – has not kept up.

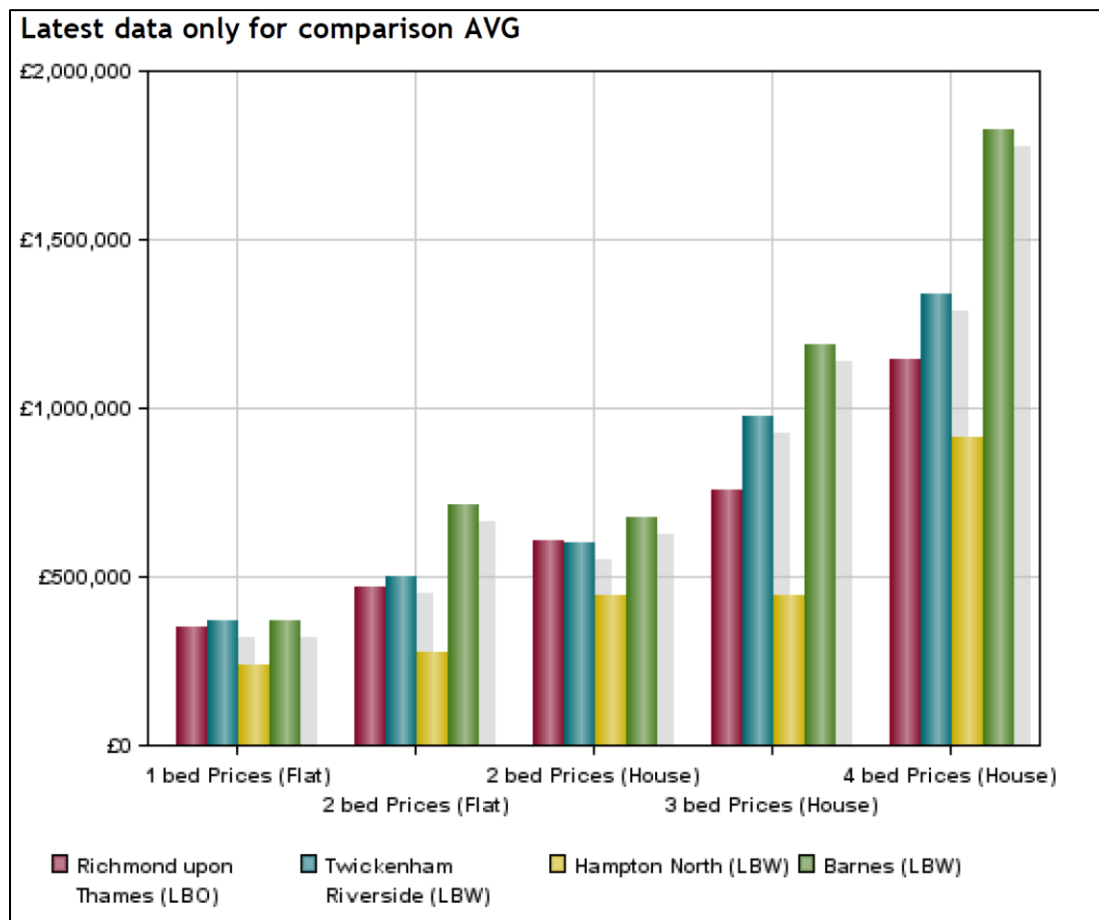
The Borough is relatively expensive compared to other parts of Outer London, with housing costs more similar to areas within Inner London. This is a reflection in part of the stock and quality of place in the Borough. Cheaper housing is more prevalent in surrounding areas, including Kingston and Hounslow (and into parts of Surrey).

It seems highly likely that prices (for rent and purchase) will continue to increase moving forwards – and that demand for rental properties will grow; and an increasing number of households will not be able to afford housing costs. Demand for affordable housing thus seems likely to continue to be strong (and will most likely grow); whilst housing costs may limit the ability of employers to recruit and retain staff – particularly for lower wage roles.

Engagement with Estate and Letting Agents

- 8.39 In order to further understand the performance of the market, GL Hearn carried consultation with several local estate agents across the borough. Semi- structured interviews were carried out in Teddington, Twickenham, Richmond, Sheen and Barnes. These areas may not have picked up some of the lower value pockets such as in Whitton and parts of the Hamptons, however it enabled us to gain more in-depth insight and identify differences and intricacies in the local housing markets within the Borough. We have sought to use this to provide qualitative evidence based on triangulating findings with a number of active local agents.
- 8.40 Overall, all of the responses were positive and stated that the sales and lettings market in LB Richmond is really strong at the moment. At the time of engagement in February 2016 the impact of Stamp Duty changes in April 2016 for buy to let and second home purchases was influencing transactions.

Figure 47: House Prices in London Borough of Richmond upon Thames, sub- area breakdown, 2016



Source: Hometrack Intelligence System, February 2016

- 8.41 There was a visible distinction in the house prices across the borough. This is reflected in the most recent data from Hometrack Housing Intelligence System, which breaks down the analysis by ward and we have used the following sub-areas to illustrate the differences across the borough: Twickenham Riverside, Hampton North, Barnes and Richmond upon Thames.
- 8.42 There is a clear difference in terms of the prices between sub-areas, where Barnes appears to be the most expensive area across most of the dwelling types. The highest difference in prices can be seen for 4 bed properties, with an average price reaching £1,831,167 in Barnes, £1,342,174 in Twickenham Riverside, £917,778 in Hampton North and £1,148,858 across the borough as a whole.

Teddington

Sales Market

- 8.43 All of the estate agents consulted across Teddington described very strong current housing market conditions, with a high level of demand outstripping supply. Consultation indicated increased activity in the sales market over the last few months, what has been driven by the low interest rates and anticipated changes to Stamp Duty.
- 8.44 The majority of buyers in the area were families and people commuting to central London, looking for a good value for money property.
- 8.45 A proportion of them had already lived in the area and had a reasonable knowledge of the area and the market. These groups were usually seeking to upsize and considered the area attractive due to its accessibility and public transport links, good schools and a number of infrastructure improvements across the borough. The price range for good quality properties was between £900,000 and £1,900,000. A small proportion (up to 5%) of the buyers was from overseas using the property as their second home and occupying it for few weeks a year.
- 8.46 Consultation indicated minor differences in the prices across the area. Prices in Hampton and Hampton Hill were starting from £500 - 550 per sq. ft. Higher values were achieved around Teddington and Fulwell, where prime locations in a close proximity to the train stations reached up to £700 per sq. ft. The best properties in the area were up to £800-900 per sq. ft. All of the agents indicated a 4-5% growth in the house prices when compared to last year. A significant proportion of the buyers (particularly for investment purchases) were fully financing the purchase with cash.
- 8.47 Consultation indicated a small proportion of new built units in the area, with current schemes including London Square's Waldegrave Road development. In terms of capital values, new build developments in Teddington were performing better than the rest of the stock. They were highly

popular and usually sold within few weeks and above the asking price. The majority of them were owner occupied. One of the most popular developments was Longfords, providing 4 bedroom semi-detached houses with the asking prices starting from £1,290,000.

- 8.48 Agents indicated a steady influx of investors over the last few months. Usually these tend to be smaller investors seeking for properties of a value between £500,000 and £600,000, up to a maximum of £700,000. Consultation indicated that there is a very active buy-to-let market. Strong rental income streams and growth in capital values appear to be a highly attractive opportunity for people who have larger amount of cash for their disposal. A significant proportion of the investors wanted to complete transactions before the end of tax year taking account of changes to Stamp Duty. This has contributed to the increased activity on the sales market over the last few months.
- 8.49 Responses regarding the future market performance were consistent. The majority of the respondents stated that the market will continue to perform well. The impact of Stamp Duty changes is expected to have a marginal short term impact. Given the recent increase in the sales activity over the past few months, it is anticipated that the sales will decrease after April 2016. The reform is not expected to bring any substantial changes to the local market in a long term. In terms of the changes to tax relief on the interest on mortgage, the proposed reforms are not expected to impact the sales market in Teddington. This is based on the fact that the significant proportion of the buyers are cash purchasers.

Lettings

- 8.50 We have further sought to get a broader understanding of the 'on the ground' letting market in the area. Respondents were highly positive, stating a strong and 'always busy' market. The area has a broad mix of tenants, with one of the largest groups being couples, young professionals and small families. These tend to prefer flats. There were a small proportion of international tenants and landlords across the lettings market.
- 8.51 Agents further indicated that most of the families moving into the area are people pushed out of more central areas due to the steady decline in affordability. The majority of them were coming from Richmond, Kew, Fulham or Hammersmith. Tenants were letting in the area for a short time to get to know the area and get onto the housing ladder. In terms of the future outlook, the lettings market majority of the respondents were positive about the next year and stated that the lettings market will continue to perform at the current rate or further increase over time.
- 8.52 Typical rents in the area start from £1,500 pcm for a 2 bedroom property, £1,750 pcm for a 3 bedroom property and £2,000 pcm and more for a 4 bedroom house. All of the responses stated a

3-5% increase in the rental values when compared to the last year. It is anticipated that the rents will continue growing over the next year.

Twickenham

Sales

- 8.53 Similarly to Teddington, market performance in Twickenham is described as very strong, with agents selling at least few properties each week. The local market is short in stock what is primarily caused by the limited supply. Recent demand has been influenced by the surge from Buy-to- Let investors arising from the changes to Stamp Duty in April 2016. This successively allows property owners to achieve values above the asking price. The area is considered to be a good value for money; with high demand largely due to the transport facilities and a good range of local amenities including retail and schools. Compared to the last year, sales prices have increased by 5-6% with best quality housing stock growing in capital values by 6-10%.
- 8.54 The area is mainly family oriented with majority of buyers being local residents. Almost 30- 40% of the buyers were considered to be new to the area, usually coming from neighbouring boroughs e.g. Wandsworth.
- 8.55 New buyers were first time buyers in their late 30s seeking to buy their first property. The most popular properties across this group were 2 bed cottages or 3 bed semi- detached houses in the region of £600,000 (these would require a deposit up to £80,000).
- 8.56 Agents indicated a small difference in the capital values between the Twickenham and neighbouring areas. This is mainly due to the characteristics of the area and proximity to public transport facilities. Lower values can be found in Whitton, where prices are around £500- £550 per sq. ft., compared to £550-600 per sq. ft. in Twickenham and £650-£700 per sq. ft. in St Margaret's. These differences can be particularly visible in case of 2 bedroom cottages. In terms of most desirable price ranges in the areas, agents indicated that properties with capital values between £500,000 and £900, 000 are the most sought after.
- 8.57 In terms of new build developments, these are highly anticipated - with properties that go off the market within weeks and above the asking price. Agents stated that there is a shortage of new build developments across Twickenham what consequently leads to tight stock and growth in capital values. One of the most recent developments in Twickenham consisted of 12 units (1-2 bed flats) and was sold in a really short period of time at a price £350,000 for a 1 bed properties and £450.000-£475,000 for 2 bed units.

8.58 Consultation indicated that the proportion of the investors in Twickenham is larger than in Teddington. Although there is a marginal number of overseas buyers and investors, there is a large proportion and some of the responses indicated nearly a half of the properties were sold to investors over the last few months. The majority of them were local, small scale investors targeting properties with values around £400,000.

8.59 In terms of future outlook, it is expected that the current pressure on the sales market is caused by the upcoming changes to Stamp Duty. With an increase in Stamp Duty (up to £15,000 on a £500,000 property) local estate agents expect a short term decrease in the market activity beyond the Spring. The longer term outlook seems to be positive, with the market stabilizing and regaining its historic levels of activity. With limited development in the pipeline, it is anticipated that the growth in capital values will continue.

Lettings

8.60 On the lettings side, there is a high demand to rent properties in the area. This is primarily due to the location to public transport and connectivity to Central London as well as lower rental values when compared to Inner London areas. Rental levels increased by 10-12% over the last 12 months. The highest demand could be observed for 1-2 bed properties.

8.61 The majority of the tenants are professional couples, single professionals and corporates. Similarly to the buyers, the majority of the tenants were coming from the neighbouring areas such as Richmond or Clapham as Twickenham area offered better value for money. Compared to Teddington, Twickenham was a better and larger market for service apartments, with several large corporations such as Shell, BP or Mercedes renting a proportion of the existing stock. Our research indicated that these tend to rent properties in Twickenham and St Margaret's and occupy 1-2 bed flats. Other tenants are professional couples or small families. These tend to prefer 2 bedroom maisonettes which are rented for £1,500- £1,700 pcm in St Margaret's.

8.62 Generally, values are higher than in Teddington. 1 bed properties start from £1,250, 2 bed units from £1,500-£1,600 and 3 beds from £2,000. Slightly higher values can be found in St Margaret's and Central Twickenham. This is in part a function of better transport link.

8.63 In terms of the future rental values, rate of growth might slow down due to the decreased yields in the area.

Richmond

Sales

- 8.64 Estate agents consulted in Richmond all described the local market as very good. Although a significant proportion of buyers were cash buyers, low interest rates and cheaper mortgages have stimulated market activity. This was particularly apparent in case of the first time buyers. Further to that, there was an increased activity of the investors on the market over the past few months, primarily driven by the anticipated changes to Stamp Duty and tax relief. The local stock was more diversified with more top- end/ prime properties. In overall terms, the area was considered more affluent than Teddington and Twickenham. Some of the responses indicated differences in performance depending on the capital values. Prime properties above £1 m that constituted a proportion of the existing housing stock were performing a little bit worse. This was justified on the basis of high transaction costs caused by 2014 Stamp Duty changes.
- 8.65 The majority of the buyers were professionals (usually 40 year old or more) with a good knowledge of the local housing market. Further to that, the last few months saw a small proportion of First-Time Buyers (early 30s). This group was targeting properties up to £600,000. More than half of the buyers were owner occupiers, although consultation indicated high levels (20% or more) of Buy-to-Let investors relative to the other areas. Richmond had a higher proportion of foreign buyers when compared to Teddington and Twickenham. These were usually second home owners or wealthy investors from Russia or Asia. Recently the proportion of these buyers has decreased due to the worsening economic situation in these countries. Nearly 50-60% of all of the purchases were paid in cash.
- 8.66 Richmond was considered to be a highly desirable postcode. It had a historic record of a strong market performance and was an attractive and affluent place to live. The most attractive locations were around the high street and on Richmond Hill. These command the highest values.
- 8.67 Prices in Richmond vary. Basing on the agent's responses we estimated that the average prices are £1,000 per sq. ft. with the properties south from the river achieving prices closer to £800 per sq. ft. and ones on the hill above £1,000. Usually capital values of the properties are around £750,000 or higher. Properties below £600,000 were particularly popular amongst first time buyers. The top end of the housing stock (£1m and above) has been less popular over the last few years and its activity is expected to decrease.
- 8.68 In terms of the investors in the area, it was estimated that these accounted for c. 30% of purchases, the majority being smaller scale buy- to- let investors. Agent's consultation indicated a presence of few (5-10) big overseas investors.

- 8.69 Due to the limited land supply there is a small number of new build units on the market. These usually consist of conversions or refurbishments and sell in a short period of time. Some of the responses indicated that significant proportion of the buyers is after old Victorian or Georgian houses due to its unique character.
- 8.70 It is expected that the impact of the proposed changes to Stamp Duty will not have a substantial effect on the market. Once again, lots of respondents linked Stamp Duty changes to the surge of market activity over the past few months. A further slowdown at the top end market is expected as the transaction costs will be a discouraging factor for many of the buyers (including investors). Given low rental yields and a large proportion of buy- to- let investors paying for property by cash, tax relief changes will not have a significant impact on the local market.

Lettings

- 8.71 The rental market was described as performing really well as activity picked up between November and December. Rental values were broadly stable and were expected to remain unchanged. The majority of the occupiers were professional couples, smaller families and sharers. Key age groups were mid-30 to 40 years olds; but with a higher proportion of older tenants in Richmond relative to other parts of the Borough.
- 8.72 Rental levels are higher than those in Teddington and Twickenham. Prices for one bed properties were starting from £1,300, 2 bed units from £1,500 up to £4,000 for highest quality units and 4 bed houses starting from £4,500.
- 8.73 According to the local estate agents, anticipated changes to Stamp Duty will not have a substantial effect on the values or the number of tenants in the area. Rental levels stabilized over the past few months and are expected to remain similar over the upcoming quarters.

Sheen and Barnes

Sales

- 8.74 Sheen and Barnes have slightly different profile of the area yet there is not a substantial difference in terms of market performance when compared to Richmond (in particular), Twickenham and Teddington. The sales market is strong with a lot of stock being sold over the past few months, with an average price for 3-4 bed property for £1m-£1.5m. Consultation indicated that there are however numerous properties that are overpriced. Agents find it difficult to sell such units – and the market appears more price sensitive than other areas in the Borough. Family houses are more popular than any other type of the property and tend to sell faster.

- 8.75 Most of the buyers are professional couples and families. This is partially determined by type of stock- a large proportion consists of 3-5 bed Victorian houses. Around 60% of the buyers are considered to be coming from the Borough. Others are relocating from areas such as Kensington, Chelsea, Notting Hill or moving from abroad. There is a small proportion of investors – the majority of the stock is owner occupied.
- 8.76 In terms of the values, lower end properties achieve around £600-700 per sq. ft., while higher end units are sold for £1,000 or more. The most common type of dwelling is 2 and 3 bed houses. Compared to Richmond, Twickenham and Teddington, there is a higher proportion of international relocations. Quite a substantial proportion of the international relocations are from Western Europe. Large families are particularly attracted to the area due to a number of schools with international profiles (such as the Swedish School).
- 8.77 There were more international buyers and investors in the previous years but numbers have fallen. One of the reasons for this might be increased transaction costs. An important factor is to the lack of the tube stop in the area. This appears to be an important factor for international investors who lack detailed knowledge of the local market. Consequently, such investors are more attracted to central London areas.
- 8.78 As in case of Richmond, Twickenham and Teddington, new build units were selling really quickly and achieved 10% premium on price.
- 8.79 In terms of the future outlook, proposed Stamp duty changes are currently driving the market.

Lettings:

- 8.80 In terms of lettings, the market performance was considered to be good, with high activity when compared to the last three years. There is a large shortage of properties to rent in the middle market. The majority of the tenants are professional couples (late 20s and 30s) and large families (late 40s). The first group occupies 1 or 2 bed flats, the latter, 3-5 bed houses.
- 8.81 Most of the tenants are relocating from more central areas. There is also a larger proportion of international relocations. People from overseas are moving into the area due to the good value for money, existing housing stock and good educational facilities (including the Swedish School).
- 8.82 In terms of the rental values, there is a small difference across the areas, with Sheen achieving lower figures than Barnes. Average rental value for 1 bed property in Sheen is £1,200, for 2 bed unit is £1,500, 3 bed houses for £2,300- £2,600 and largest 4 bed units starting from £2,800. This can be compared to Barnes where 1 bed flat is rented for £1,500, 2 bed properties for £2,000, 3

bed houses for £2,600 and 4 bed houses starting from £2,800. Rental levels have gone up over the last year, with rental values increasing by 3-8% depending on the property and the landlord. Current yields are reaching 3-4% (this is relatively low compared to other locations in London). Given a steady growth in the capital values it is expected that the yields will continue to decrease.

- 8.83 It is expected that the proposed changes will not have a substantial impact on the performance of the market. Stamp Duty changes that are described as the main driver behind recent increases in activity, but are expected to result in a decline in the number of transactions post April 2016. It is anticipated that after this short- term impact the market will return to its normal performance shortly thereafter.

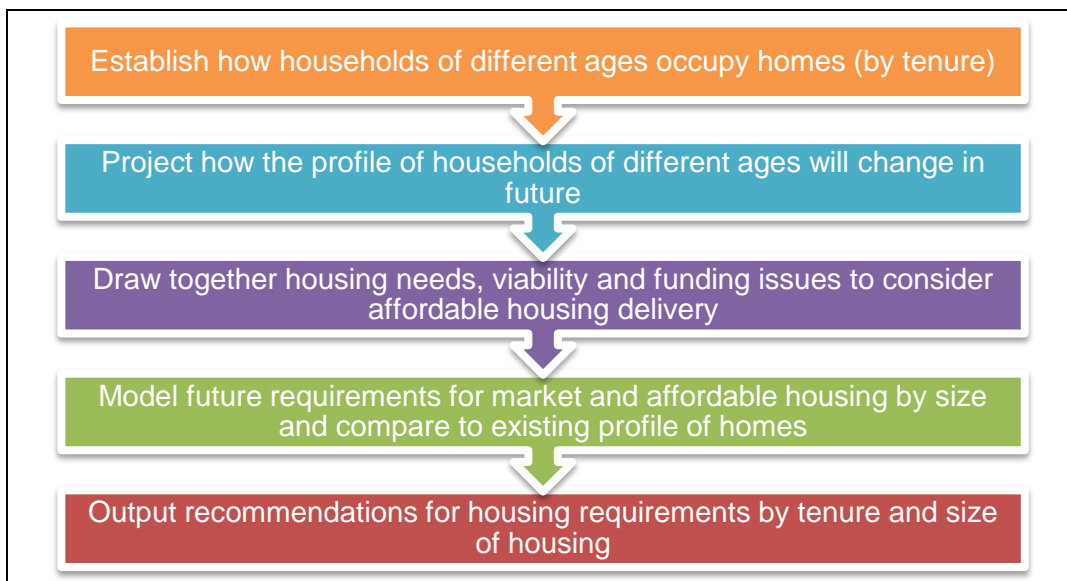
9 NEED FOR DIFFERENT TYPES OF HOMES

- 9.1 There are a range of factors which influence housing demand. These factors play out at different spatial scales and influence both the level of housing demand (in terms of aggregate household growth) and the nature of demand for different types, tenures and sizes of homes. It is important to understand that the housing market is influenced by macro-economic factors, as well as the housing market conditions at a regional and local level.
- 9.2 The analysis in this section considers information about the size and structure of the population and how this might influence the need for different types of homes. This should be considered as representing a long-term analysis of the need for different types of homes over the period to 2033; whereas the analysis in the previous section considered short-term market demand.
- 9.3 For analysis purposes, the modelling assumes population and household growth in line with two of our demographic projections:
- GLA Long-Term Migration Trends Projection (unconstrained land supply);
 - GLA SHLAA (CLG) (constrained land supply).
- 9.4 These projections indicate a household growth of around 19,200 and 5,150 respectively across the Borough between 2014 and 2033.
- 9.5 It should be noted that these projections may not necessarily be translated directly into policies for housing provision, but have been used to indicate the likely need for different sizes of homes moving forward.

Methodology

- 9.6 Figure 48 below describes the broad methodology employed in the housing market model which is used to consider the need for different sizes of market and affordable homes. Data is drawn from a range of sources including the 2011 Census and demographic projections.

Figure 48: Stages in the Housing Market Model



Understanding how Households Occupy Homes

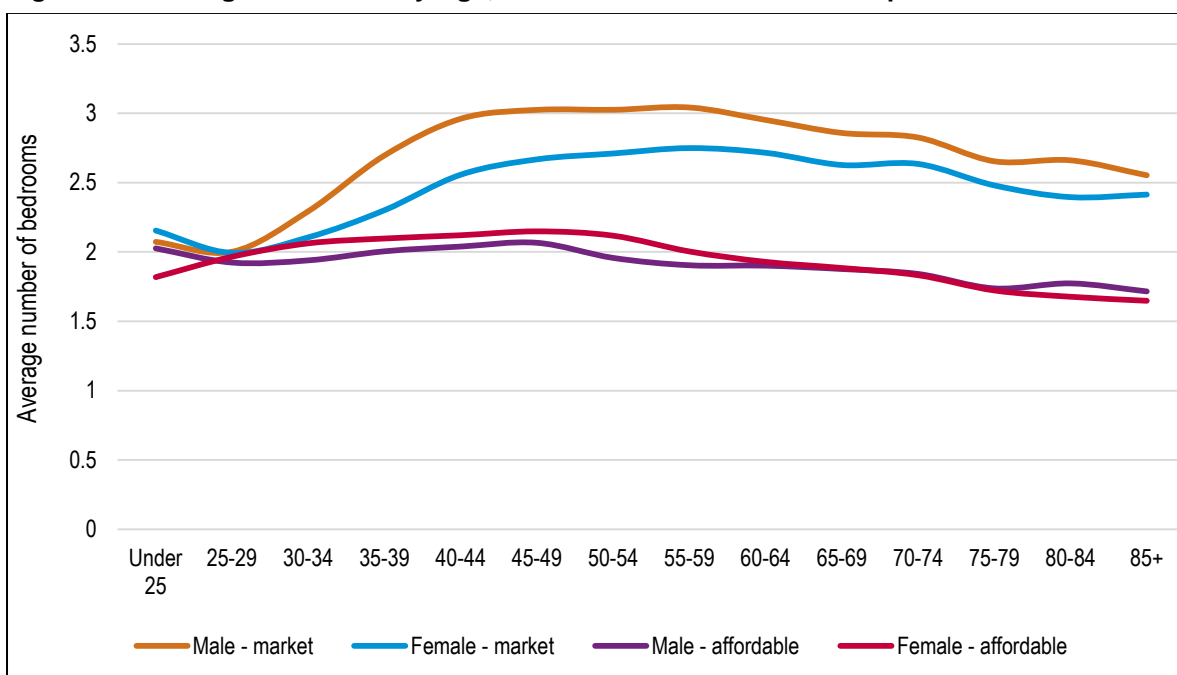
- 9.7 Whilst the demographic projections provide a good indication of how the population and household structure will develop, it is not a simple task to convert the net increase in the number of households in to a suggested profile for additional housing to be provided. The main reason for this is that in the market sector households are able to buy or rent any size of property (subject to what they can afford) and therefore knowledge of the profile of households in an area does not directly transfer into the sizes of property to be provided.
- 9.8 The size of housing which households occupy relates more to their wealth and age than the number of people which they contain. For example, there is no reason why a single person cannot buy (or choose to live in) a four-bedroom home as long as they can afford it and hence projecting an increase in single person households does not automatically translate in to a need for smaller units. This issue is less relevant in the affordable sector (particularly since the introduction of the social sector size criteria) although there will still be some level of under-occupation moving forward with regard to older person and some working households who may be able to continue to under-occupy their current homes.
- 9.9 The approach used is to interrogate information derived in the projections about the number of household reference persons (HRPs) by age and sex group and apply this to the profile of housing within these groups. The data for this analysis has been formed from a commissioned table by ONS (Table C1213 which provides relevant data for all local authorities in England) with data then

calibrated to be consistent with 2011 Census data (e.g. about house sizes in different tenure groups and locations).

9.10 Figure 49 below shows an estimate of how the average number of bedrooms varies by different ages of HRP and different sexes by broad tenure group. In the market sector the average size of accommodation rises over time to typically reach a peak around the age of 60. In the affordable sector this peak appears earlier. After this peak the average dwelling size decreases – as typically some households downsize as they get older.

9.11 It is also notable that the average size for affordable housing dwellings are lower than those for market housing whilst in market housing male HRPs live in larger accommodation for all age groups (with no particular trend being seen in the affordable sector).

Figure 49: Average Bedrooms by Age, Sex and Tenure – Richmond-upon-Thames



Source: Derived from ONS Commissioned Table C1213 and 2011 Census

Establishing a Baseline Position

9.12 As of 2014 it is estimated that there were 82,631 households living in LB Richmond-upon-Thames. Analysis of Census data linked to the demographic baseline provides an estimate of the profile of the housing stock in 2014, as shown in the table below. This shows that an estimated 13% of households live in affordable housing with 87% being in the market sector. The size of the affordable sector has been fixed by reference to an estimate of the number of occupied social rented and shared ownership homes in the 2011 Census (data updated to 2014 through reference

to CLG Live Table 100). The data also suggests that homes in the market sector are generally bigger than in the affordable sector with 56% having three or more bedrooms compared to 26% for affordable housing.

Table 51: Estimated Profile of Occupied Dwellings in 2014 by Size – Richmond-upon-Thames

Size of housing	Market		Affordable		Total	
	Number	%	Number	%	Number	%
1 bedroom	9,656	13.4%	4,334	40.9%	13,990	16.9%
2 bedrooms	21,861	30.3%	3,481	32.9%	25,342	30.7%
3 bedrooms	20,821	28.9%	2,383	22.5%	23,204	28.1%
4+ bedrooms	19,738	27.4%	395	3.7%	20,133	24.4%
Total	72,076	100.0%	10,593	100.0%	82,669	100.0%
% in tenure	87.2%		12.8%		100.0%	

Source: Derived from 2011 Census

Tenure Assumptions

- 9.13 The housing market model has been used to estimate the future need for different sizes of property over the 19-year period from 2014 to 2033. The model works by looking at the types and sizes of accommodation occupied by different ages of residents, and attaching projected changes in the population to this to project need and demand for different sizes of homes. However, the way households of different ages occupy homes differs between the market and affordable sectors (as shown earlier). Thus it is necessary to consider what the mix of future housing will be in the market and affordable sectors.
- 9.14 It is necessary on this basis to make some judgement for modelling purposes on what proportion of net completions might be of market and affordable housing as households occupy homes in different ways in these sectors. Data from the London Plan Annual Monitoring Report (2014-15) indicates that around 25% of all housing completions in the Borough were affordable housing in the 2012-15 period set against a 50% strategic target for affordable housing. It is difficult from this information to precisely know what level of delivery might be achieved in the future; we have for example not carried out any viability testing or a review of available sites. Therefore, for the purpose of modelling, the analysis assumes that 40% of net completions across all types of sites are of affordable housing.
- 9.15 To be clear, this is not a policy target – it is solely a modelling assumption based on past delivery and current policy. Policy targets for affordable housing on new development schemes are above this; but not all sites deliver policy-compliant affordable housing provision, whilst some delivery is on

sites below affordable housing policy thresholds. Equally some housing development is brought forward by Registered Providers and local authorities and may deliver higher proportions of affordable housing than in current policy. It should be stressed that this is not a policy position and has been applied simply for the purposes of providing outputs from the modelling process.

Key Findings: Market Housing

- 9.16 There are a range of factors which can influence demand for market housing in different locations. The focus of this analysis is on considering long-term needs, where changing demographics are expected to be a key influence. It uses a demographic-driven approach to quantify demand for different sizes of properties over the 19-year period from 2014 to 2033.
- 9.17 On the basis of the unconstrained modelling assumptions, an increase of 11,500 additional households is modelled. Roughly a third of these fit into each of the 2- and 3-bedroom categories with around 10% being a need for 1-bedroom homes and a quarter 4 or more bedrooms. The data suggests that housing need can be expected to reinforce around the existing profile, but with a slight shift towards a requirement for larger dwellings relative to the distribution of existing housing. This is the opposite finding to that observed in many part of the country (where the profile tends towards smaller dwellings) and occurs in the Borough because older person households tend to live in larger homes with less evidence of downsizing than is observed elsewhere.
- 9.18 With a constrained projection driving the outputs it can be seen that the profile is even more strongly towards larger homes (and indeed a negative need for one bedroom homes). This finding links to the points above about older people living in larger homes. With the constrained projection, there is expected to be population growth in age bands from about 50 and upwards, with general population losses in younger age cohorts. Therefore, seeing higher growth in age cohorts that typically live in larger homes drives the analysis to show a future need for a larger dwelling profile to be provided.

Table 52: Estimated Size of Dwellings Needed 2014 to 2033 – Market Housing – Richmond-upon-Thames (GLA long-term migration assumptions)

Size	2014	2033	Additional households 2014-2033	% of additional households
1 bedroom	9,656	10,853	1,197	10.4%
2 bedrooms	21,861	25,445	3,583	31.1%
3 bedrooms	20,821	24,478	3,657	31.8%
4+ bedrooms	19,738	22,809	3,071	26.7%
Total	72,076	83,585	11,509	100.0%

Source: Housing Market Model

Table 53: Estimated Size of Dwellings Needed 2014 to 2033 – Market Housing – Richmond-upon-Thames (GLA SHLAA CLG – constrained assumptions)

Size	2014	2033	Additional households 2014-2033	% of additional households
1 bedroom	9,707	9,450	-257	-8.3%
2 bedrooms	21,977	22,776	799	25.9%
3 bedrooms	20,931	22,321	1,390	45.0%
4+ bedrooms	19,842	21,000	1,158	37.5%
Total	72,458	75,548	3,090	100.0%

Source: Housing Market Model

- 9.19 The statistics are based upon the modelling of demographic trends. As has been identified, it should be recognised that a range of factors including affordability pressures and market signals will continue to be important in understanding market demand. This may include an increased demand in the private rented sector for rooms in a shared house due to changes in housing benefit for single people. In determining policies for housing mix, policy aspirations are also relevant.
- 9.20 At the strategic level, a local authority in considering which sites to allocate, can consider what type of development would likely be delivered on these sites. It can also provide guidance on housing mix implicitly through policies on development densities.

Key Findings: Affordable Housing

- 9.21 The tables below show estimates of the need for different sizes of affordable homes based on the analysis of demographic trends. The data suggests in the period between 2014 and 2033 that the main need is for homes with one- or two-bedrooms across the Borough regardless of whether or not a constrained projection is used (although the constrained projection tends to push the need disproportionately towards smaller homes). With an unconstrained projection, there is a need for 76% of homes to have 1- or 2- bedrooms and this increases to 81% when household growth is constrained by housing land availability.
- 9.22 This analysis provides a longer-term view of the need for different sizes of affordable housing and does not reflect any specific priorities such as for family households in need rather than single people. In addition, it should be noted that smaller properties (i.e. one bedroom homes) typically offer limited flexibility in accommodating the changing needs of households, whilst delivery of larger properties can help to meet the needs of households in high priority and to manage the housing stock by releasing supply of smaller properties. This may however be moderated by welfare reforms limiting the amount of housing benefit being paid to some working-age households. It should be

noted that the London Plan particularly promotes – based on strategic level analysis – the delivery of affordable family homes, as have the Council’s existing planning policies.

9.23 The Council also has to meet a number of strategic housing needs all of which lead to policy considerations that emphasise the need for the delivery of larger family sized units for affordable rented homes. These policy considerations include:

- **Historic supply of affordable units;** historically a large number of bedsit and one bedroom properties were built in the borough, some of which are no longer fit for purpose. The Councils recent policy approach has been to develop larger family units to counterbalance historic build issues. However there will still be a need to provide further smaller homes to both accommodate those in need (particularly priority needs such as the homeless) and also to support downsizing in the existing stock.
- **Overcrowding in the social housing sector;** data from the Census highlighted in the Housing Strategy 2013 – 2017 found that Housing association tenants still have a higher proportion of tenants living in overcrowded accommodation at just over 10% compared to 7% of private rented tenants and 4% of owner occupiers.
- **Research on the needs of those most likely to be re-housed;** Previous research by DTZ to inform the Tenancy Strategy (2013) found that those households in the most housing need and the households most likely to be re-housed via the Housing Register required family sized accommodation. The report therefore recommended a bias towards developing larger affordable units for rent.
- **Making best use of existing stock;** by developing larger units the Council can free up smaller units of accommodation through the use of ‘chain lettings’, where an existing household in social housing moves from a two to a three bedroom property, in the process freeing up the smaller unit.

Table 54: Estimated Size of Dwellings Required 2014 to 2033 – Affordable Housing – Richmond-upon-Thames (GLA long-term migration assumptions)

Size	2014	2033	Additional households 2014-2033	% of additional households
1 bedroom	4,334	7,710	3,376	44.0%
2 bedrooms	3,481	5,943	2,462	32.1%
3 bedrooms	2,383	3,958	1,575	20.5%
4+ bedrooms	395	655	260	3.4%
Total	10,593	18,266	7,673	100.0%

Source: Housing Market Model

Table 55: Estimated Size of Dwellings Required 2014 to 2033 – Affordable Housing – Richmond-upon-Thames (GLA SHLAA constrained assumptions)

Size	2014	2033	Additional households 2014-2033	% of additional households
1 bedroom	4,334	5,392	1,058	51.4%
2 bedrooms	3,481	4,088	607	29.5%
3 bedrooms	2,383	2,723	340	16.5%
4+ bedrooms	395	450	55	2.7%
Total	10,593	12,653	2,060	100.0%

Source: Housing Market Model

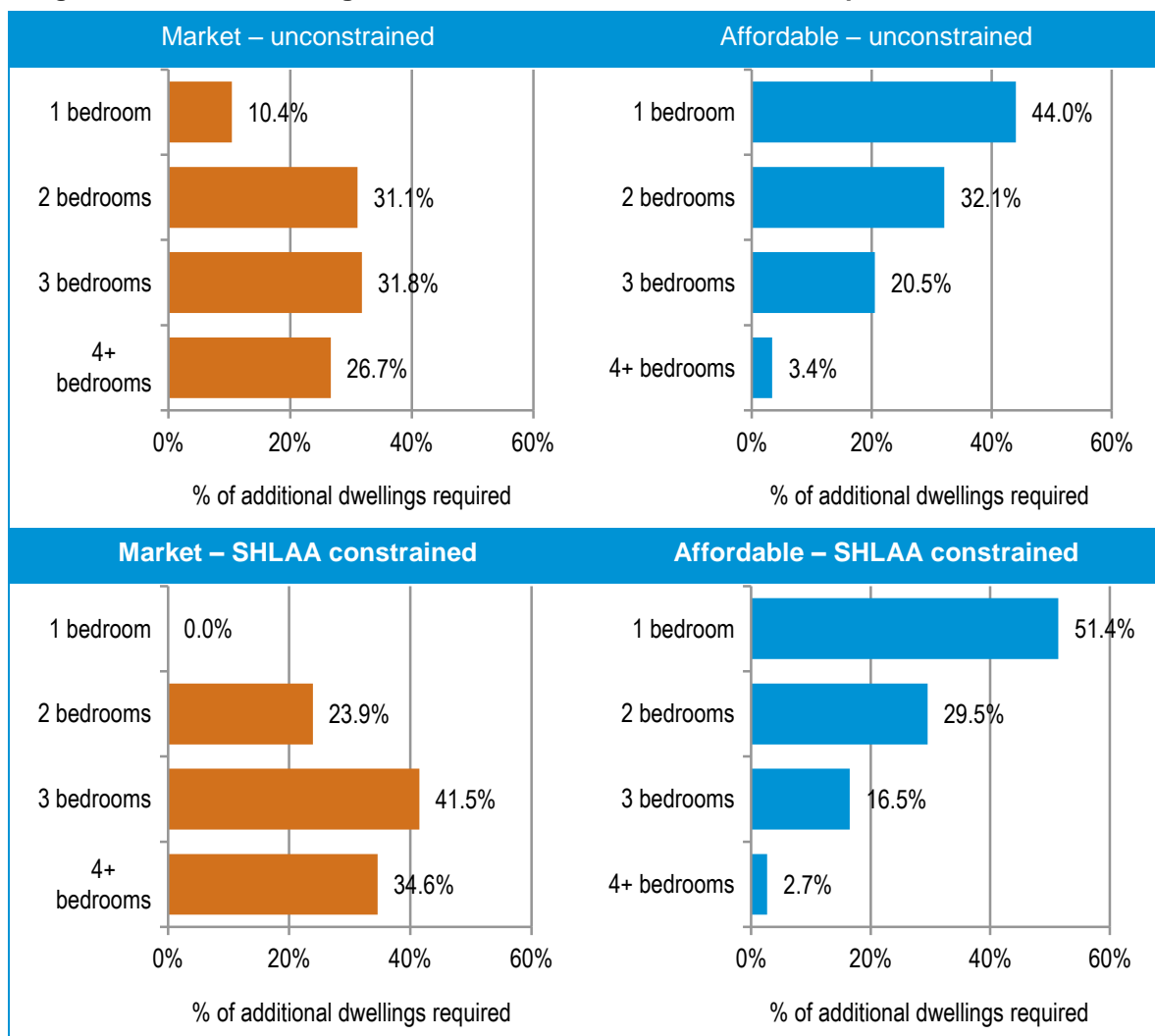
9.24 In contrast to the analysis of market housing, the data shows that relative to the current profile there is a slight move towards a greater proportion of smaller homes being needed. This is related to the ageing population and the observation that older person households in the affordable sector are more likely to occupy smaller dwellings.

Indicative Targets by Dwelling Size

9.25 The figure below summarises the above data in both the market and affordable sectors under the modelling exercise. For the market sector in the SHLAA-constrained analysis, the 1-bed figure has been set at zero, and other figures adjusted to sum to 100%.

9.26 Whilst the outputs of the modelling provide estimates of the proportion of homes of different sizes that should be provided, there are a range of factors which should be taken into account in setting policies for provision. This is particularly the case in the affordable sector where there are typically issues around the demand for and turnover of one bedroom homes. Conclusions also need to consider that the stock of four-bedroom affordable housing is very limited and tends to have a very low turnover. As a result, whilst the number of households coming forward for four or more bedroom homes is typically quite small the ability for these needs to be met is even more limited.

Figure 50: Size of Housing Needed 2014 to 2033 – LB Richmond-upon-Thames



Source: Housing Market Model

9.27 It should also be recognised that local authorities have statutory homeless responsibilities towards families with children and would therefore prioritise the needs of families over single person households and couples. Strategic policies in the London Plan also emphasise the particular need for affordable family housing across London. On this basis the profile of affordable housing to be provided would be further weighted to two or more-bedroom housing.

9.28 For these reasons it is suggested in converting the long-term modelled outputs into a profile of housing to be provided (in the affordable sector) that the proportion of one bedroom homes required is reduced slightly from these outputs with a commensurate increase in four or more bedroom homes also being appropriate.

- 9.29 There are thus a range of factors which are relevant in considering policies for the mix of affordable housing sought through development schemes. At a Borough-wide level, the analysis would support policies for the mix of affordable housing of:
- 1-bed properties: 35-40%
 - 2-bed properties: 30-35%
 - 3-bed properties: 20-25%
 - 4-bed properties: 5-10%
- 9.30 The strategic conclusions recognise the role which delivery of larger family homes can play in releasing supply of smaller properties for other households; together with the limited flexibility which one-bed properties offer to changing household circumstances which feed through into higher turnover and management issues.
- 9.31 The need for affordable housing of different sizes will vary by area (at a more localised level) and over time. In considering the mix of homes to be provided within specific development schemes, the information herein should be brought together with details of households currently on the Housing Register in the local area and the stock and turnover of existing properties, see further comments below regarding the Housing Register Data.
- 9.32 In the market sector, against a context of a constrained land supply there are potential policy choices about what is prioritised in delivery; together with a broader policy question regarding whether overall numbers of homes delivered should be prioritised over different types of homes. The evidence presented in the preceding sections in particular highlight demand for family housing, in particular from households in their late 20s and 30s. However, a constrained land supply may limit the ability of families to move into the Borough.
- 9.33 A constrained housing delivery position is likely to see a significant ageing of the population and indeed population losses in younger age groups (particularly people aged under 50). Providing appropriate housing for older households to downsize may also release larger family homes within the existing stock.

- 9.34 On the basis of these factors it is considered that the provision of market housing should be more explicitly focused on delivering smaller family housing for younger households (2-bedroom homes) and some 1-bedroom units for younger single people and childless couples. On this basis, the following mix of market housing is recommended:
- 1-bed properties: 10-15%
 - 2-bed properties: 25-30%
 - 3-bed properties: 30-35%
 - 4-bed properties: 25-30%
- 9.35 The figures can be used as a monitoring tool to ensure that future delivery is not unbalanced when compared with the likely requirements as driven by demographic change in the area. Evidently there will be sites where higher density flatted development is appropriate and as such a higher proportion of smaller 1 and 2 bed properties would likely be delivered, or vice versa taking account of local character.

Dwelling size requirements and the Housing Register

- 9.36 As well as modelling an estimate of dwelling sizes in the affordable sector using an understanding of current occupancy patterns and demographic change, it is relevant to use the Housing Register data to study the size requirements of households with a need for housing (including looking at the intensity of this need through the Allocations Policy points system).
- 9.37 As noted previously, the points system is to some extent used as a tool to match households to available lettings and therefore those applicants considered as 'live' (i.e. with a greater chance of being rehoused) are not necessarily those with the greatest needs (for example, a household with a 4-bedroom need may require a higher level of points to fall into the 'live' category) but 'live' cases can be seen as a useful proxy for those households reaching a need threshold for the size of property their household requires and most likely to be re-housed and actually gain a housing association home.
- 9.38 The analysis below firstly seeks to look at the intensity of need rather than the 'live' cases for rehousing. This is undertaken in terms of the sizes of homes required with the table below showing (for the whole Housing Register) the number and proportion of households in each size category. Of a total of 4,860 households on the Register it can be seen that over half have a need for a one-bedroom home and only 2.4% fall into a 4+ bedroom need. It should be noted with only approximately 330 lettings available each year the majority of households on the Register will not be re-housed with re-housing going only to those with the highest points of the Register. Therefore

whilst households requiring a one bedroom property are proportionally high, the majority of households are unlikely to gain the points required to be offered a property.

Table 56: Size requirement for all households on the Register

Number of bedrooms	Number of applicants	% of applicants
1 bedroom	2,515	51.7%
2 bedrooms	1,640	33.7%
3 bedrooms	586	12.1%
4+ bedrooms	119	2.4%
Total	4,860	100.0%

Source: Richmond-upon-Thames Housing Register

9.39 When the analysis moves on to look at the points scored by applicants it is clear that those with a need for smaller homes typically attract a lower number of points. The table below shows that households with a one-bedroom need have an average of 232 points and this figure rises to 335 for households who need four or more bedrooms. This analysis would identify that whilst the overall register shows a particularly high need for one bedroom homes, households with a need for larger homes typically have a more acute housing situation.

Table 57: Average Points by size of home required

Number of bedrooms	Average points
1 bedroom	232
2 bedrooms	249
3 bedrooms	270
4+ bedrooms	335
Total	245

Source: Richmond-upon-Thames Housing Register

9.40 To try to see what potential gaps there are between supply and need an analysis has been undertaken to match a level of need with a level of supply. Analysis in Section 7 has identified an annual supply from relets (excluding intermediate housing and the pipeline) of 347 lettings per annum. Analysis has therefore been undertaken to look at the 347 households on the Register with the most acute needs (highest points). Essentially this analysis is looking at the need on the assumption of one years' supply of relets. Analysis at this point in time identifies that there are 348 households with 405 or more points and these have been used in the analysis.

9.41 The table below therefore shows the size requirements of households with 405 or more points. This shows (when compared with the whole register) that there is a lower need from households with a one-bedroom need and slightly higher figures for all other sizes. For the whole Register, some

51.7% of households need one bedroom and this figure is slightly reduced to 47.1% when the focus is just on the 348 applicants with the highest points. It should be noted that the existing Housing Register scheme significantly priorities downsizers (via the points system) to free up larger family homes, the majority of whom require one bedroom properties. This may account for around 15% of the most highly pointed one bedroom households, with 25 moves occurring each year. The percentage size requirements for one bedrooms units is therefore influenced by this policy consideration and this should be considered when recommending the size mix of affordable units i.e. a lower percentage may well be a better reflection of actual need.

Table 58: Size requirement of applicants with 405 or more points

Number of bedrooms	Number of applicants	% of applicants
1 bedroom	164	47.1%
2 bedrooms	125	35.9%
3 bedrooms	46	13.2%
4+ bedrooms	13	3.7%
Total	348	100.0%

Source: Richmond-upon-Thames Housing Register

9.42 To look at the balance between need and supply, a second analysis has been carried out to look at the sizes of homes that have been let over the past five years (to the end of 2015). This analysis shows that slightly over half of all homes let have had one-bedroom. The table below presents the size requirement of the need (based on those with 405 or more points) and the profile of supply. The final column of the table is a simple calculation of the difference between the figures. This identifies a relative over-supply of one and three bedroom homes and a relative under-supply of 2 and 4+ bedroom homes.

Table 59: Size requirement of applicants with 405 or more points and profile of supply

Number of bedrooms	Size needed	Supply	Difference
1 bedroom	47.1%	53.0%	-5.9%
2 bedrooms	35.9%	29.5%	6.4%
3 bedrooms	13.2%	14.8%	-1.6%
4+ bedrooms	3.7%	2.6%	1.1%
Total	100.0%	100.0%	-

Source: Richmond-upon-Thames Housing Register/Allocations Data

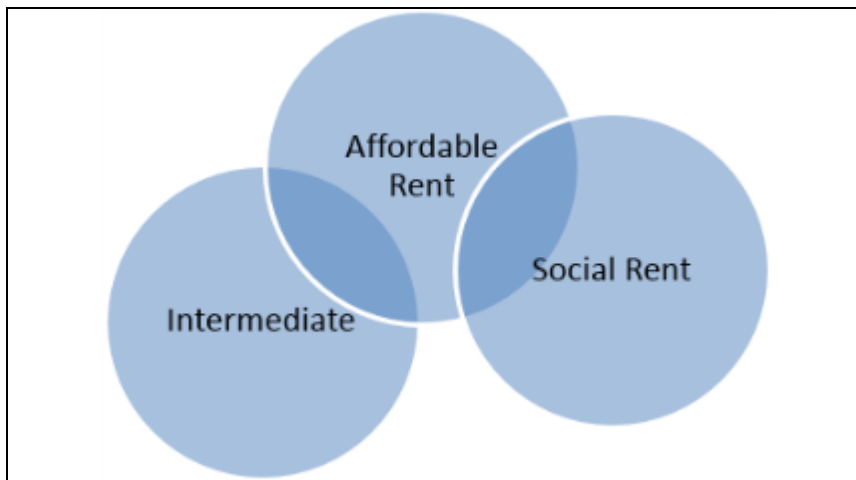
9.43 Overall the analysis seems to support a relatively higher need for one bedroom homes. However, it is equally clear that this is the stock with the highest supply. This information should be read alongside the analysis of the size requirements from occupancy patterns and demographic change when translating into a broad profile of housing to be provided. The analysis would support a lower

level of provision of one and three bedroom homes (relative to the modelled outputs) and slightly higher proportions of 2 and 4+ bedroom homes.

Need for Different Types of Affordable Housing

- 9.44 As well as considering the sizes of homes required the analysis makes an estimate of the proportion of affordable housing need that should be met through provision of different housing products. The income information used in the affordable needs analysis is used to estimate the proportion of households who are likely to be able to afford intermediate housing and the number for whom only social or affordable rented housing will be affordable. There are three main types of affordable housing that can be studied in this analysis:
- Intermediate
 - Affordable rent
 - Social rent
- 9.45 Whilst the process of separating households into different income bands for analytical purposes is quite straightforward, this does not necessarily tell us what sort of affordable housing they might be able to afford or occupy. For example, a household with an income close to being able to afford market housing might be able to afford intermediate or affordable rent but may be prevented from accessing certain intermediate products (such as shared ownership) as they have insufficient savings to cover a deposit. Such a household might therefore be allocated to affordable rented or intermediate rented housing as the most suitable solution.
- 9.46 The distinction between social and affordable rented housing is also complex. Whilst rents for affordable rented housing would be expected to be higher than social rents, this does not necessarily mean that such a product would be reserved for households with a higher income. In reality, as long as the rent to be paid falls at or below LHA limits then it will be accessible to a range of households (many of whom will need to claim housing benefit).
- 9.47 Over the spending period to 2015 grant funding was primarily available to support delivery of affordable rented homes although this is now shifting towards a focus on shared ownership accommodation (in the 2016-21 Affordable Homes Programme). However, a significant level of affordable housing delivery is however through developer contributions (Section 106 Agreements) and in Richmond through the Housing Capital Programme.
- 9.48 For these reasons it is difficult to exactly pin down what proportion of additional affordable homes should be provided through different affordable tenure categories. In effect there is a degree of overlap between different affordable housing tenures, as the figure below shows.

Figure 51: Overlap between Affordable Housing Tenures



9.49 The intermediate category would include equity-based intermediate products such as shared ownership and shared equity homes. The other two categories are both rented housing and in reality can be considered together (both likely to be provided by Registered Providers (with some degree of subsidy). Additionally, both affordable rented and social rented housing is likely to be targeted at the same group of households; many of whom will be claiming Housing Benefit. For these reasons the last two categories are considered together for the purposes of drawing conclusions, for analytical purposes we have defined the following two categories:

- Households who can afford 80% or more of market rent levels (termed intermediate housing) – this will include equity-based intermediate products such as shared ownership and shared equity homes;
- Households who would not afford 80% of market rent levels (or would require housing benefit, or an increased level of housing benefit to do so) – this has been termed social/affordable rented although in reality our analysis shows that a rent at 80% of a lower quartile market rent in some areas would potentially be lower than for a social rented home.

9.50 We do not have detailed information on households' savings. For the purposes of the analysis of affordability it has been assumed that all households with an income which would allow them to afford 80% or more of market rents would represent the potential market for equity-based intermediate products such as shared ownership and shared equity homes with the remainder needing a rented product.

9.51 When working the above assumptions through the affordability models developed in the affordable needs analysis (taking account of the different elements of need and using a 40% affordability threshold) it is estimated that around a fifth of households would be able to afford a product priced at 80% of the market housing cost.

Table 60: Gross Need for Intermediate Affordable Housing

Component of need (all per annum)	Afford 80% of market rents	Cannot afford 80% of market rents	Total
Current need (with housing)	18	70	87
Current need (without housing)	3	22	25
Newly forming households	211	733	944
Existing households falling into need	37	244	281
Total	270	1,068	1,338
Percentage of total	20%	80%	100%

9.52 However, the figures in the table above should not be directly taken to be the proportion of housing that should be provided as intermediate. There are two factors which need to be considered and these are described below:

- Savings and or access to a deposit – as noted, there is no information about household savings and their ability to afford an equity-based intermediate product. In reality, many households with a modest income may not be able to afford intermediate housing due to this factor. For this reason, the figures presented in the table above are arguably too high
- Supply of intermediate housing – however, the current supply of affordable housing also needs to be considered. As previous analysis has shown, the vast majority of the affordable housing stock and relets is in the social/affordable rented category with only a modest supply of intermediate housing. Therefore, it is arguable that a higher proportion of intermediate housing would be needed due to this imbalance.

9.53 As can be seen these two factors suggest that the need is either higher or lower than presented in the table above. Given this, it is suggested that a prudent response would be to consider the figures in the table as being broadly reflective of the need for intermediate products. Given the range of figures the following is suggested as a reasonable tenure mix for affordable housing across the Borough:

- 20% - intermediate housing
- 80% - social and affordable rented housing

9.54 In determining policies for affordable housing provision on individual sites, the analysis should be brought together with other local evidence such as from the Housing Register. Consideration could also be given to areas with high concentrations of social rented housing where additional intermediate housing might be desirable to improve the housing mix and to create 'housing pathways'.

Need for Starter Homes

9.55 In October 2015, the Government published the Housing and Planning Bill 2015-16. This set out a number of government initiatives which are likely to directly influence the supply and demand for housing and affordable housing.

9.56 Unfortunately, the detail of the final Bill is not yet available at the time of writing and is not expected to be enacted until May 2016 at the earliest¹³. However, in its current version (December 2015) the Bill will introduce a statutory requirement for local authorities to promote the supply of Starter Homes in England. Starter homes are defined as:

- a new dwelling;
- which is available for purchase by qualifying first-time buyers only;
 - First Time Buyer, Under 40,
- is to be sold at a discount of at least 20% of the market value;
- is to be sold for less than the price cap;
 - £450,000 inside London, and
- Is subject to any restrictions on sale or letting specified in regulations made by the Secretary of State.

9.57 In December 2015, a consultation on changes to National Planning Policy Framework was started. This included proposals to include Starter Homes within the definition of affordable housing. Whilst the inclusion of Starter Homes within the definition of affordable housing looks to be quite a radical change there is some consistency with the current NPPF which seeks in para 50 to '*widen opportunities for home ownership*'. The Housing and Planning Bill proposes significant areas will be clarified in secondary legislation that the Government need to bring into effect to set out further requirements for local authorities and therefore details to inform implementation will remain uncertain until later in 2016. In March 2016 the Government consulted on the Regulations including how the proposals may be delivered through the planning system.

9.58 Whilst there is no published methodology for assessing the need for Starter Homes (unlike for affordable housing need as currently defined in the PPG) it does seem logical that the need can be considered in a similar way (i.e. that there is a "current need" and will be a "future need" as the population age structure changes and cohorts move through time). Hence the analysis seeks to consider likely need (on an annual basis) taking account of both current and projected need.

9.59 The analysis undertaken looks at a gross need with no reduction for estimated supply; this makes sense given that at present Starter Homes are not available as a product. It also makes the analysis slightly more straight forward. It should also be recognised that in reality there is a degree of overlap between the potential market for shared ownership homes, homes sold under the Government's Help-to-Buy Scheme and Starter Homes.

¹³ The Bill received Royal Assent on 12 May 2016 to become the [Housing and Planning Act 2016](#)

The Target Group

9.60 As a precursor it is useful to understand why the Starter Home initiative has been introduced. Whilst it is not stated, it is considered that one of the key reasons is the fall in the number of younger owner-occupiers across the Country over the past 15-year or so (and certainly since 2001). Using Census data, it is possible to look at this in some detail with the table below showing that the number of households living in private rented accommodation has increased by around 4,600 between 2001-11 in the Borough, whilst the number of owners with a mortgage has dropped (by around 2,900). The trend over the decade has been of a falling number of young households able to move into homeownership, and increases in those renting.

Table 61: Change in tenure 2001-11 (all households) – Richmond-upon-Thames

Tenure	2001	2011	Change	% change
Outright owner	22,244	23,756	1,512	6.8%
Owned with mortgage	30,522	27,595	-2,927	-9.6%
Social rented	8,930	10,051	1,121	12.6%
Private rented	12,855	17,440	4,585	35.7%
Other	1,595	993	-602	-37.7%
Total	76,146	79,835	3,689	4.8%

Source: Census (2001 (Table UV63) and 2011 (Table QS405EW))

9.61 If the proportion of households in each tenure group had stayed the same in 2011 as it was in 2001 then it would have been expected that there would be 13,500 households living in the private rented sector. The actual number is about 4,000 higher than this and therefore it is arguable that this is the number of households who might be considered as ‘would be owner-occupiers’ and therefore a potential target group for Starter Homes. For some young households, renting may have however been a lifestyle choice or desired because of its flexibility.

9.62 The data above shows information for all households and it needs to be recognised that the Starter Home Initiative is to be targeted at non-owners aged under 40. Interrogating changes for this age group is difficult as the two Census (2001 and 2011) use different age bandings and do not typically include an ‘up to 40’ band in the data. It is however possible to provide an indication of the change in tenure by looking at households age under 35 and this is shown in the table below. It should be noted that to provide consistent analysis, both groups of owners have been merged, whilst the private rented category also includes the ‘other’ category as shown in the table above.

9.63 For the Under 35 age group the analysis again shows an increase in the number of households living in private rented accommodation. Surprisingly the growth in this age group is slightly below that for all households although it does need to be borne in mind that overall this age group also saw a decrease generally in numbers. The analysis also highlights a very significant decrease in

the number of owner occupiers (decreasing by about two-fifths in just 10-years). This analysis does provide some support for widening access to owner-occupation for younger people.

Table 62: Change in tenure 2001-11 (all households aged under 35) – LB Richmond-upon-Thames

Tenure	2001	2011	Change	% change
Owned	7,808	4,493	-3,315	-42.5%
Social rented	1,410	1,823	413	29.3%
Private rented	6,722	7,461	739	11.0%
Total	15,940	13,777	-2,163	-13.6%

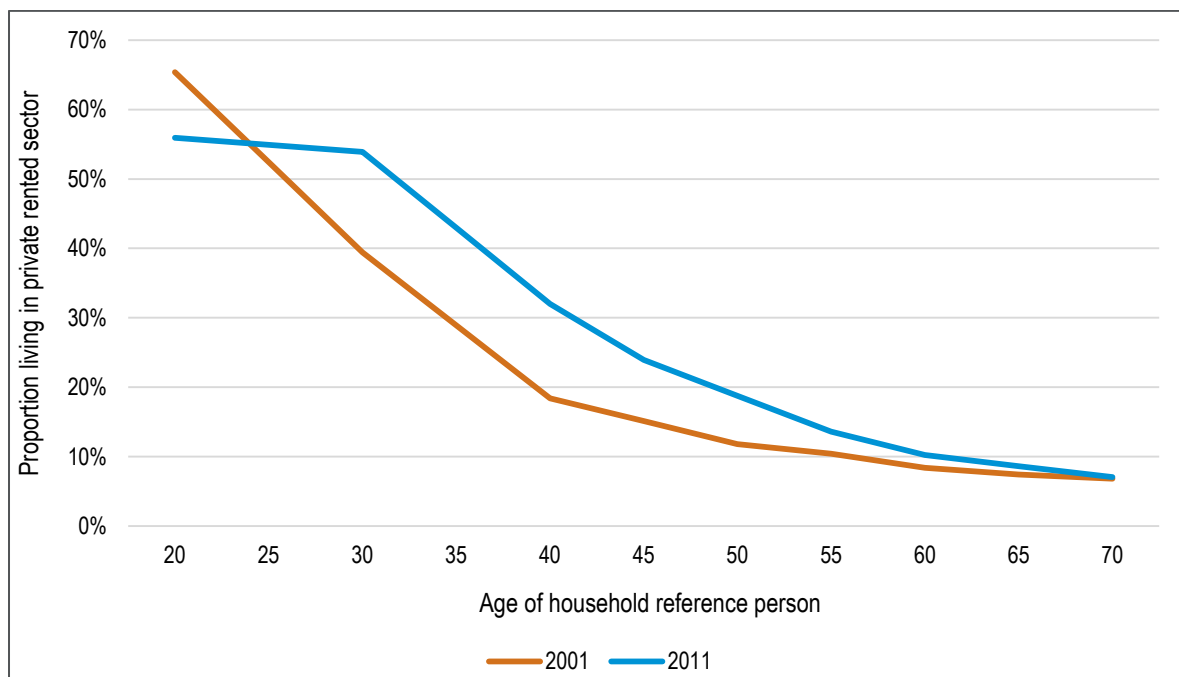
Source: Census (2001 (Table S013) and 2011 (DC4201EW))

Estimating Households in the Target Group

- 9.64 To look at the current need for Starter Homes an analysis has been undertaken to estimate the size of the target group for such housing. This has been assumed to be the difference between the number of households living in the private rented sector in 2011 with the number that might have been expected if there were no changes in the proportion of households in this sector from 2001 (the analysis then being limited to households who are aged Under 40 (where the household reference person is aged under 40)).
- 9.65 Arguably there will be other households who might be in this target group, particularly those currently living with parents; however, these are not included in the current need as it is assumed that they will be picked up as part of the projection of need (i.e. at the time at which they might be expected to form an independent household). Additionally, there could be some households living in social rented housing who might be part of this target group; however, in this case it is not considered that many (if any) of such households would have sufficient levels of income to afford a Starter Home (and even if they did, they might well wish to remain in their current subsidised housing).
- 9.66 The first part of the analysis looks at the proportion of people (by age) who live in private rented accommodation. As noted above this analysis is slightly imperfect as the Census source used does not allow for a split to be made at age 40. Additionally, data from each of the 2001 and 2011 Census use slightly different age bandings within published analysis. We have therefore plotted the data available and drawn a trend line between the available data points to establish what proportion of different age bands live in the private rented sector – this analysis includes the ‘other’ tenure category due to this not being able to be separated out within the 2001 Census data.
- 9.67 Figure 52 shows this analysis, this clearly identifies high levels of private renting amongst younger age groups, the analysis also shows an increase in the proportion of households privately renting in

2011 compared with 2001 (for all age groups other than those aged under 20 which has very few households anyway) – the biggest increase looks to be for households aged 30 to 40 with the proportion privately renting in 2011 estimated to be 14% higher than in 2001.

Figure 52: Change in proportion of households living in private rented housing (2001-11) by age – LB Richmond-upon-Thames



Source: Census (2001 (Table S013) and 2011 (DC4201EW))

9.68 Table 63 below summarises the information from the figure above to make an estimate of the changes in the proportions living in the private rented sector for various age bands up to age 40. For the analysis the percentages are taken as the midpoint between age groups; the exception being for those Under 20, where the estimated proportion aged 20 is taken to reflect the value; this will not have any significant impact on the analysis as the proportion of households in this age group is quite small. The analysis clearly identifies an increase in the proportion in the private rented sector for all age groups.

Table 63: Change in proportion of households living in Private Rented Housing (2001-11) by Age – LB Richmond-upon-Thames

	2001	2011	Change
Under 20	65.4%	55.9%	-9.5%
20-24	58.9%	55.4%	-3.5%
25-29	45.9%	54.4%	8.5%
30-34	34.2%	48.4%	14.2%
35-39	23.7%	37.5%	13.8%

Source: Census (2001 (Table S013) and 2011 (DC4201EW))

9.69 To work out the current size of the target group of households for Starter Homes, the change in the proportion of households in the private rented sector is multiplied by the number of households in each age band. This analysis is shown in the table below and identifies around 2,600 households as currently being a potential target for Starter Homes.

Table 64: Estimated Current Target Group for Starter Homes – LB Richmond-upon-Thames

	Number of households (2014)	% in target group	Number in target group (2014)
Under 20	135	-9.5%	-13
20-24	1,226	-3.5%	-43
25-29	3,947	8.5%	335
30-34	7,074	14.2%	1,008
35-39	9,503	13.8%	1,312
Total	21,885		2,599

Source: Census (2001 and 2011) and demographic projections

9.70 The analysis above has considered the current target group for Starter Homes. It is also necessary to understand how many new households will be expected to join this group moving forward. To study this, a similar analysis is carried out to that in the main affordable needs modelling; this seeks to estimate the number of new households in each of the age bands up to age 40. The new households are calculated as the number of household reference persons (HRP) in an age band who were not an HRP five years previously. The analysis is based on annual figures over the full projection period of 2014 to 2033) and shows that each year an additional 186 households are expected to fall into the target group for Starter Homes.

Table 65: Projected Target Group for Starter Homes (per annum) – Richmond-upon-Thames

	Number of newly forming households	% in target group	Number in target group
Under 20	32	-9.5%	-3
20-24	255	-3.5%	-9
25-29	590	8.5%	50
30-34	515	14.2%	73
35-39	541	13.8%	75
Total	1,933		186

Source: Census (2001 and 2011) and demographic projections

Affordability of Starter Homes

9.71 To understand the likely affordability of Starter Homes in the Borough a similar analysis to that in the main affordability modelling has been undertaken. This essentially seeks to estimate the income levels likely to be required to access housing and the income profile of the target group (i.e. non-owners (and specifically those in private rented accommodation) aged under 40). Income estimates are then compared with the estimated level of income required to access such housing.

Access level for Starter Homes

9.72 In looking at the cost of housing it needs to be recognised that Starter Homes will be a new-build product (and therefore may have a small premium) and that discounts on open market value (OMV) of at least 20% will be available. To establish the likely OMV we have looked at Land Registry data for new-build properties in 2015 and taken a lower quartile value to equate to a typical cost; the use of a lower quartile is trying to recognise that Starter Homes are likely to be towards the bottom end (in price terms) of the new-build market and may be smaller unit sizes.

9.73 In 2015 the lower quartile new-build price in Richmond-upon-Thames was £393,750. To convert this into an income level it has been assumed that there will be either a 20% or 30% discount and it has also been assumed that a household will have a 10% deposit. Whilst a deposit may potentially be an issue for a number of households, it is the case that Starter Homes will be able to be bought in conjunction with other incentives (such as HTB Shared Equity schemes (with 40% of mortgage covered by the Govt for years 1-5) which could help affordability in the short term albeit with increased interest costs on unsold equity after year 5 or alternatively a help to buy ISA etc.). Finally, it is assumed that a mortgage could be secured for four times the household income. This is slightly higher than the typical multiples used in such analysis (which often use 3 to 3.5 times income) but again reflects the fact that there is likely to be some keenness from Government to ensure that

prospective households are able to access the finance they need. For the Help-to-Buy Scheme, the maximum income multiple is for instance 4.5.

9.74 Table 66 below therefore works through the calculations to determine what level of income might be required to be able to buy a Starter Home. The analysis shows that an income of about £70,875 would be needed if the discount were 20% and that this falls to £62,016 with a 30% discount on OMV.

Table 66: Estimated income levels required to access Starter Homes at different levels of discount – Richmond-upon-Thames

	20% discount	30% discount
Open Market Value	£393,750	£393,750
With discount	£315,000	£275,625
Minus deposit (amount of mortgage)	£283,500	£248,063
Income required	£70,875	£62,016

Source: Derived from Land Registry data

Income Levels

9.75 The next step in the process is to consider income levels. The difficulty here is that we are wanting to focus on a very particular group of households (non-owners aged under 40) about which specific data does not readily exist. However, it is considered that the majority of the target group will be households living in private rented accommodation and so some consideration of income levels in this sector will help to get an idea of our target group. Additionally, it is possible to look at HMRC data about the incomes of people in different age bands. The analysis of the incomes of the target group of households therefore essentially has two stages:

- How do income levels of each age group compare with the overall average?
- How do income levels of those living in the private rented sector vary from other households?

9.76 Table 67 below shows average (median) income before tax for people aged both under and over 40 (the data is from the Survey of Personal Incomes 2013-14) for the whole of the Country but only includes taxpayers. This indicates that the income levels of people aged under 30 are lower than those of people aged over 40 but that people aged 30-39 typically have slightly higher incomes.

9.77 It should however be remembered that this is an imperfect analysis and in reality it is probable that income levels amongst older people are relatively higher (if for example there are other non-tax incomes such as from dividends). Additionally, the figures are for individual taxpayers rather than households (which is the category used for the affordability analysis); hence the figures in the last column should be given some weight although the actual income levels shown are of limited use.

Table 67: Estimated income levels by age (United Kingdom)

Age group	Median income (before tax)	% of all taxpayers
Under 20	£12,100	55.3%
20-24	£15,200	69.4%
25-29	£20,200	92.2%
30-34	£24,000	109.6%
35-39	£26,100	119.2%
All ages (including 40 and over)	£21,900	-

Source: National Statistics - Distribution of median and mean income and tax by age range and gender (2013-14)

9.78 When looking specifically at households in the private rented sector we have looked at data from the English Housing Survey. In 2013-14 (the latest year for which data is available) this source shows an average (mean) income of £580 per week in the private rented sector, compared with £672 for all households – the private rented sector is therefore at about 86% of the overall average.

9.79 On the basis of this analysis, it is concluded for the purposes of modelling the incomes of the target group by age can be calculated by multiplying age specific differences in incomes by the typical proportion of all household income seen in the private rented sector. The table below shows estimated median incomes in LB Richmond-upon-Thames for the target group for Starter Homes by age; the figure shown are calculated as a proportion of the overall median income in the Borough which as of 2015 has been estimated to be £51,202 per annum.

9.80 The analysis suggests that younger households in the target group will have relatively low incomes, however by the time a household reaches about age 30, income levels are similar to those seen across the whole Borough.

Table 68: Estimated income levels by age for Starter homes target group – LB Richmond-upon-Thames

Age group	Multiplier from all household income	Estimated median income
Under 20	0.48	£24,417
20-24	0.60	£30,672
25-29	0.80	£40,762
30-34	0.95	£48,430
35-39	1.03	£52,667

Source: Derived from a range of analysis (as described)

Affordability

9.81 In taking this information forward an income distribution has been constructed for each age group based on the distribution for all households. This is then applied to the income thresholds already derived to estimate the likely proportion of households in each age group who might be able to afford a starter home. This is shown in the table below and shows that about 9% of households

aged Under 20 would be expected to be able to afford a Starter Home with a 20% discount on OMV; this figure rises to over 40% when considering the 35-39 age group and a 30% discount.

9.82 These figures essentially include anyone with an income above the thresholds derived and analysis based on these figures should be considered as indicative; for example, some of the higher earners in this category would have the choice between Starter Homes and other owner-occupied products and may not choose the discounted new-build option.

Table 69: Affordability of Starter Homes by age band and level of discount – Richmond-upon-Thames

Age group	% able to afford (20% discount)	% able to afford (30% discount)
Under 20	9.3%	11.9%
20-24	14.1%	17.9%
25-29	23.5%	29.8%
30-34	31.7%	38.1%
35-39	35.8%	41.9%

Source: Derived from a range of analysis (as described)

Bringing the analysis together – the Potential Need for Starter Homes

9.83 The analysis below brings together the analysis of the number of households in a target group for Starter Homes along with the affordability estimates. Analysis is provided separately for the current and future need and then brought together into a single annual estimate of the potential need for Starter Homes. To be consistent with the analysis of affordable housing need, the figures are presented as annual figures for the whole of the projection period (i.e. 2014-33).

9.84 Table 70 below shows the estimated current need for Starter Homes; this varies from 859 to 1,023 depending on the level of discount assumed. Annualised, this represents between 45 and 54 homes per annum over the 19-year period to 2033.

Table 70: Estimated Current Need for Starter Homes (2014-33)

Age group	Size of target group	20% discount		30% discount	
		% able to afford	Number able to afford	% able to afford	Number able to afford
Under 20	-13	9.3%	-1	11.9%	-2
20-24	-43	14.1%	-6	17.9%	-8
25-29	335	23.5%	79	29.8%	100
30-34	1,008	31.7%	319	38.1%	383
35-39	1,312	35.8%	469	41.9%	549
TOTAL	2,599		859		1,023
Annualised			45		54

Source: Derived from a range of analysis (as described)

9.85 Table 71 below shows a similar analysis for future newly forming households; this analysis indicates a potential need for between 60 and 72 Starter Homes each year (depending on the level of discount applied).

Table 71: Estimated Future Need for Starter Homes (per annum)

Age group	Size of target group	20% discount		30% discount	
		% able to afford	Number able to afford	% able to afford	Number able to afford
Under 20	-3	9.3%	0	11.9%	0
20-24	-9	14.1%	-1	17.9%	-2
25-29	50	23.5%	12	29.8%	15
30-34	73	31.7%	23	38.1%	28
35-39	75	35.8%	27	41.9%	31
TOTAL	186		60		72

Source: Derived from a range of analysis (as described)

9.86 Adding together the figures for current and newly forming need for Starter Homes the analysis identifies a **potential need for between about 105 and 126 Starter Homes to be provided each year from 2014 to 2033. These figures represent 10% and 12% of the total need for housing identified by unconstrained demographic projections** (a need for around 1,050 dwellings each year) and a much higher proportion (37%-45%) if compared with a constrained position of 281 dwellings per annum.

9.87 This is a policy off assessment for “starter homes” and assumes housing delivery at a certain level. However, as set out earlier in the report delivery is expected to be much lower than the estimated need. Furthermore there are only very limited areas of the Borough where the required £393,000 open market value can be achieved to deliver the 20% discount.

9.88 Evidently not all households who could potentially afford a Starter Home will choose to buy one – some may choose to continue renting; whilst others may choose to purchase properties within the second hand market. It seems likely that in a number of instances there will be properties available at a comparable price in the second hand market to levels at a 20% discount to new-build values.

9.89 The difference between the estimated need based on either a 20% or 30% discount is not particularly significant (about 21 dwellings per annum) and would suggest, on the basis of this analysis, that there is little merit in seeking discounts on OMV which are higher than the minimum position (of 20%) suggested by the Housing and Planning Bill. With a 20% discount (rather than higher discounts) it is possible that additional affordable housing (e.g. social/affordable rent) will be able to be viably provided to help meet the needs of lower income households in the Borough.

9.90 Additionally, it should be noted that the need for Starter Homes derived in this assessment should not be seen as a need for additional homes over and above the numbers suggested in the demographic modelling. As can clearly be seen from the analysis, it is considered that the provision of Starter Homes will enable some households in the private rented sector to move into owner-occupation. In doing so a dwelling would be released for use by another household and hence there is no net additional need for housing as a result of including Starter Homes within the mix of housing to be delivered.

Private Rented Sector

9.91 As the above analysis demonstrates, there has been a notable growth within the Private Rented Sector in the Borough over the 2001-11 period; albeit that the rate of growth has not been as significant as in a number of other parts of London. A growing number of younger households are renting for longer.

9.92 Whilst delivery of Starter Homes may assist some younger households in moving into home ownership, it seems reasonable to expect some further growth in private renting.

9.93 Most private rented supply is currently provided by small landlords who rent individual or small numbers of properties. There has however been a growing interest from institutional investors in the sector, and are a number of new-build PRS schemes across London.

9.94 Some of the benefits of institutionally delivered and managed PRS supply include the on-going management of stock, as well as in some situations a range of facilities and services provided on-site.

9.95 GL Hearn considers that there is some potential for this sector to grow in the Borough, particularly through development in town centre locations, although this may not be a priority need. The viability of such development is however fundamentally different to build to sale or a more traditional mixed tenure scheme (where the development receives 'receipts' from sales upfront) and as set out in national Planning Policy Guidance this would need to be taken into account in negotiating Section 106 Agreements on a case by case basis.

Implications – Need for Different Sizes of Homes

- There are a range of factors which will influence demand for different sizes of homes, including demographic changes; future growth in real earnings and households' ability to save; economic performance, supporting down-sizing and housing affordability. The analysis linked to long-term (12-year) demographic change concludes that the following represents an appropriate mix of affordable and market homes:

	1-bed	2-bed	3-bed	4+ bed
Market	10-15%	25-30%	30-35%	25-30%
Affordable	35-40%	30-35%	20-25%	5-10%
All dwellings	25-30%	25-30%	25-30%	20-25%

- An alternative view on affordable housing mix is also presented. This is based on the needs of those in priority needs within the housing register. This suggests a broadly similar housing mix to that modelled with perhaps less emphasis on provision of one and three bedroom homes (relative to the modelled outputs) and conversely a slightly higher proportions of 2 and 4+ bedroom homes.
- The strategic conclusions in the affordable sector recognise the role which delivery of larger family homes can play in releasing supply of smaller properties for other households; together with the limited flexibility which one-bed properties offer to changing household circumstances which feed through into higher turnover and management issues.
- A mix of market housing should be delivered including family housing and options for older households to downsize (which can then release existing larger family homes for other households). Provision of smaller properties, including rented stock, will also cater for younger households.
- There is some potential for institutional investment to deliver build-to-rent schemes in the Borough; but this is not a priority need and it the viability of such schemes will need to be assessed on a case by case basis.
- A potential need is established for between 105-126 households per year for Starter Homes, representing between 10-12% of the demographic need. The analysis suggests that there is little merit in providing discounts of over 20%.
- Some 20% of the net need identified for affordable housing could be met through intermediate housing, with 80% of the need for social or affordable rented homes. This is in line with current policy. The types of intermediate housing could include products such as shared ownership or shared equity, although the cost of such products should be carefully considered to ensure they are genuinely affordable – this will need to include consideration of any deposit requirements which may be a barrier to access for a number of households as well as the current supply of such housing.

10 HOUSING NEED OF PARTICULAR GROUPS WITHIN THE POPULATION

10.1 We have established overall housing requirements for different sizes of properties over the next 19-years, however there can be specific groups within the population who require specialist housing solutions or for whom housing needs may differ from the wider population. These groups are considered within this section.

10.2 Estimates of household groups who have particular housing needs is a key output of the SHMA Guidance whilst the National Planning Policy Framework identifies that local planning authorities should plan for a mix of housing which takes account of the needs of different groups in the community. This will need to be put together with the Council's local evidence and research to inform setting of policy targets.

10.3 The following key groups have been identified which may have housing needs which differ from those of the wider population:

- Older Persons;
- People with disabilities;
- Black and Minority Ethnic (BME) households;
- Households with children
- Young people
- Students

Housing Needs of Older People

10.4 A key driver of change in the housing market over the next few years is expected to be the growth in the population of older persons. Indeed, as population projections show, the number of older people is expected to increase significantly over the next few years. In this section we draw on a range of sources including our population projections, 2011 Census information and data from POPPI (Projecting Older People Population Information).

10.5 The context to older persons housing provision can be summarised as below:

- A rising population of older people;
- Many older households are equity rich and are able to exercise housing choice;
- A move away from residential institutions towards providing care support in someone's homes through adaptation and visiting support; and
- An increased diversity of specialist housing to reflect different levels of care support.

10.6 The London Plan 2015 set indicative requirement benchmarks for specialist housing for older people 2015 – 2025 (Annex A5, Table A5.1) to inform local expression of strategic needs. For Richmond the annual indicative benchmark is 135 – of which 105 private and 30 intermediate sale.

The Council expressed concern that the Assessment of Potential Demand has fundamental limitations including the assumption that 50% of affordable housing stock is not fit for purpose and that a specific proportion of elderly will choose this type of housing when there is a wide choice of accessible easy to run flats available. It also corresponds to almost half of the overall housing target without assessing other needs. We can therefore look in more detail at the needs of older people.

Current Population of Older Persons

- 10.7 Table 72 provides baseline population data about older persons and compared this with other areas. The data for has been taken from the published ONS mid-year population estimates and is provided for age groups from 65 and upwards. The data shows, when compared the whole of London that Richmond has a higher proportion of older persons, but a lower proportion in a national context. In 2014 it is estimated that 15% of the population of Richmond was aged 65 or over.

Table 72: Older person population (2014)

Age group	Richmond-upon-Thames		London	England
	Population	% of popn	% of popn	% of popn
Under 65	165,287	85.4%	88.5%	82.4%
65-74	15,518	8.0%	6.1%	9.5%
75-84	8,550	4.4%	3.8%	5.7%
85+	4,230	2.2%	1.6%	2.3%
Total	193,585	100.0%	100.0%	100.0%
Total 65+	28,298	14.6%	11.5%	17.6%

Source: ONS mid-year population estimates

Future Changes in the Population of Older Persons

- 10.8 As well as providing a baseline position for the proportion of older persons in the Borough we can use population projections to provide an indication of how the numbers might change in the future. The data provided below is based on two of the GLA projections: a) based on long-term migration trends and b) a projection constrained by the SHLAA.
- 10.9 The data shows that Richmond-upon-Thames (in line with other areas) is expected to see a notable increase in the older person population with the total number of people aged 65 and over projected to increase by 34%-47% depending on the projection being used. Additionally, there is expected to be particularly strong growth in the population aged 85 and over.
- 10.10 Whilst total population growth is projected to be much stronger with trend-based assumptions it is notable that the vast majority of the difference is due to assumptions about population change in the Under 65 age bracket. With the constrained projection, population growth in the 65 and over age group is some 3,900 lower than with trend-based assumptions, the equivalent difference for the

Under 65 population is over 30,000. This highlights the fact that older people tend to be less migratory and hence lower migration assumptions disproportionately impact on change to the younger population.

Table 73: Projected Change in Population of Older Persons (2014 to 2033)

Age group	GLA long-term migration		SHLAA constrained projection	
	Change in population	% change	Change in population	% change
Under 65	20,055	12.1%	-10,552	-6.4%
65-74	4,969	32.0%	2,577	17.0%
75-84	4,584	53.6%	3,138	37.2%
85+	3,757	88.8%	3,653	82.9%
Total	33,365	17.2%	-1,185	-0.6%
Total 65+	13,310	47.0%	9,367	33.5%

Source: GLA projection modelling

Characteristics of Older Persons Households

10.11 We have used 2011 Census data to explore in more detail the characteristics of older person households in Richmond-upon-Thames (based on the population aged 65 and over). The first table below shows the number of households compared with London and England. The data shows that in 2011 around 17% of households were comprised entirely of people aged 65 and over. This is notably above the figure for London (14%) but some way below the equivalent figure for England (21%). The data for Richmond also identifies a particularly high proportion of single older person households.

Table 74: Older Person Households (Census 2011)

Older person households	Richmond-upon-Thames	London	England
Single older person	9,434	312,022	2,725,596
2 or more older people	4,461	142,723	1,851,180
All households	79,835	3,266,173	22,063,368
Single older person	11.8%	9.6%	12.4%
2 or more older people	5.6%	4.4%	8.4%
All households	100.0%	100.0%	100.0%
Total % older person only	17.4%	13.9%	20.7%

Source: 2011 Census

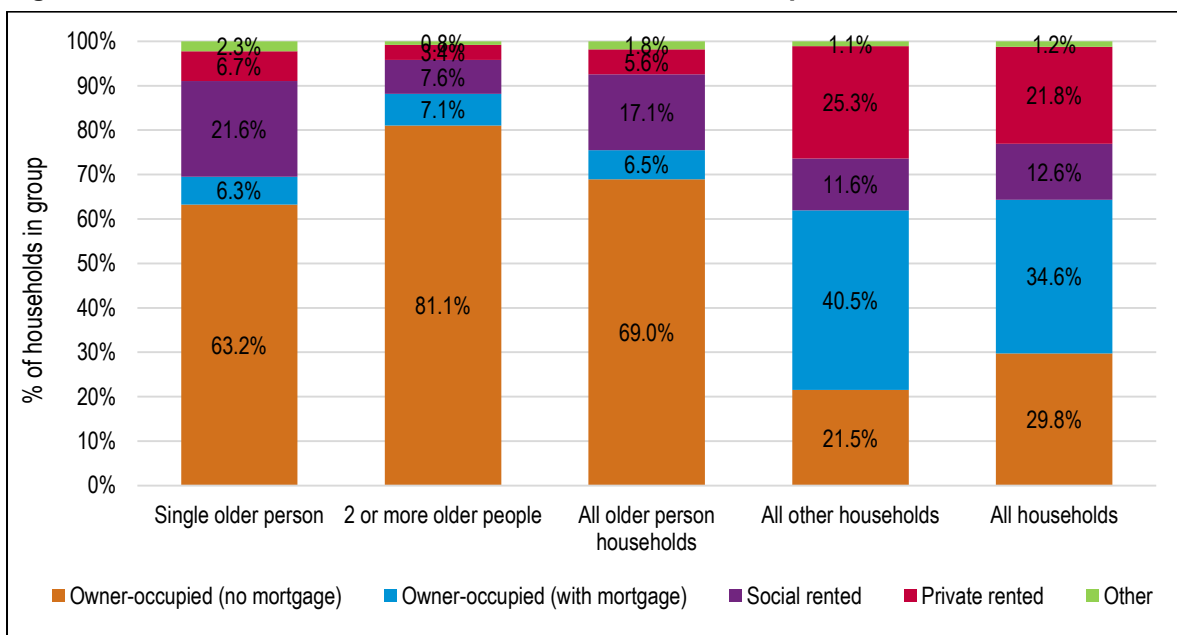
10.12 Figure 53 below shows the tenure of older person households – the data has been split between single older person households and those with two or more people aged 65+ (which will largely be couples). The data shows that older person households are relatively likely to live in outright owned

accommodation (69%) and are more likely than other households to be in the social rented sector. The proportion of older person households living in the private rented sector is relatively low (6% compared with 22% of all households in the Borough).

10.13 There are however notable differences for different types of older person households with single older person households having a lower level of owner-occupation than larger older person households – this group also has a much higher proportion living in the social rented sector.

10.14 Given that the number of older people is expected to increase in the future and that the number of single person households is expected to increase this would suggest (if occupancy patterns remain the same) that there will be a notable demand for affordable housing from the ageing population. That said, the proportion of older person households who are outright owners (with significant equity) may mean that market solutions will also be required to meet their needs. This is considered later in this section. Additionally demand data from the Housing Register demonstrates that demand for rented sheltered housing is low compared to that for other forms of affordable housing.

Figure 53: Tenure of Older Person Households – Richmond-upon-Thames

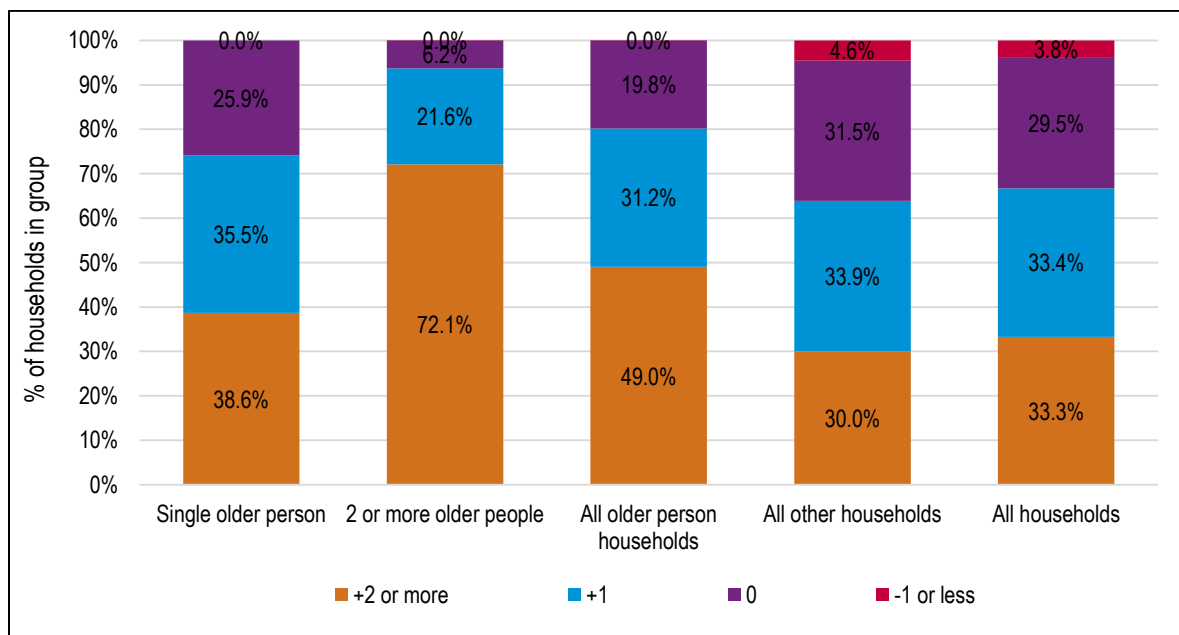


Source: 2011 Census

10.15 A key theme that is often brought out in SHMA work is the large proportion of older person households who under-occupy their dwellings. Data from the Census allows us to investigate this using the bedroom standard. The Census data does indeed suggest that older person households are more likely to under-occupy their housing than other households in the Borough. In total 49% have an occupancy rating of +2 or more (meaning there are at least two more bedrooms than are

technically required by the household). This compares with 30% for non-older person households. Further analysis suggests that under-occupancy is far more common in households with two or more older people than single older person households.

Figure 54: Occupancy rating of older person households – Richmond-upon-Thames



Source: 2011 Census

10.16 It is of interest to study the above information by tenure. Table 75 below shows the number of older person households who had an occupancy rating of +2 or more in each of three broad tenure groups in 2011. Whilst the majority of older person households with an occupancy rating of +2 or more were in the owner-occupied sector, there were 345 properties in the social rented sector occupied by older person only households with an occupancy rating of +2 or more. This may therefore present some opportunity to reduce under-occupation although to achieve this it may be necessary to provide housing in areas where households currently live and where they have social and community ties.

Table 75: Older person households with occupancy rating of +2 or more by tenure.

Tenure	Single older person households	2 or more older people	All older person only households
Owner-occupied	3,225	2,918	6,143
Social rented	250	95	345
Private rented	170	44	214
All tenures	3,645	3,057	6,702

Source: 2011 Census

- 10.17 It should however be recognised that many older households in the private sector will have built up equity in their existing homes. In the private sector many older households may be able to afford a larger home than they need (and thus under-occupy housing). Some may look to downsize to release equity from homes to support their retirement (or may move away from the area); however, we would expect many older households to want to retain family housing with space to allow friends and relatives to come to stay. Data about household ages and the sizes of homes occupied in the previous section does indicate that some households do typically downsize, however, a cautious view should be taken about the willingness of households to move to smaller homes and the extent to which this can be influenced through policy.

Retirement Housing Review

- 10.18 The Council have recently published their Retirement Housing Review (October 2015) which analyses the need for retirement housing among residents aged 60. The paper considers the key drivers for need in the Borough and will inform housing, health and social care commissioners and assist providers of retirement housing when reviewing existing stock or developing new schemes.
- 10.19 The paper also provides key information on numbers, tenure and level of support to allow plans for retirement housing schemes to be tailored to local needs in the London Borough of Richmond upon Thames. The report can be found at http://www.richmond.gov.uk/retirement_housing_review.pdf
- 10.20 The approach differs slightly from that set out in this report. The paper notes that there could be a need for an additional 145 retirement housing units across 3 or 4 schemes in the Borough. It does however emphasise that retirement housing products need to meet local needs and be assessed on a site by site basis.

Health-related Population Projections

- 10.21 In addition to providing projections about how the number and proportion of older people is expected to change in the future we can look at the likely impact on the number of people with specific illnesses or disabilities. For this we have used data from the Projecting Older People Information System (POPPI) website which provides prevalence rates for different disabilities by age and sex. For the purposes of the SHMA, analysis has focused on estimates of the number of people with dementia and mobility problems.
- 10.22 For both of the health issues analysed the figures relate to the population aged 65 and over. The figures from POPPI are based on prevalence rates from a range of different sources and whilst these might change in the future (e.g. as general health of the older person population improves) the estimates are likely to be of the right order.

10.23 The table below shows that both of the illnesses/disabilities are expected to increase significantly in the future although this would be expected given the increasing population. In particular, there is projected to be a large rise in the number of people with dementia (up 58-68%) along with a 46-58% increase in the number with mobility problems.

Table 76: Estimated population change for range of health issues (2014 to 2033)

Projection	Type of illness/disability	2014	2033	Change	% increase
Long-term migration	Dementia	2,040	3,421	1,381	67.7%
	Mobility problems	5,258	8,303	3,045	57.9%
SHLAA constrained	Dementia	2,072	3,282	1,210	58.4%
	Mobility problems	5,271	7,712	2,441	46.3%

Source: Data from POPPI and demographic projections

Indicative Need for Specialist Housing

10.24 Given the ageing population and higher levels of disability and health problems amongst older people there is likely to be an increased requirement for specialist housing options moving forward. The analysis in this section draws on data from the Housing Learning and Information Network (Housing LIN) along with our demographic projections to provide an indication of the potential level of additional specialist housing that might be required for older people in the future.

Current Stock of Specialist Housing

10.25 The table below shows the current supply of specialist housing for older people. At present it is estimated that there are just under 1,200 units; this is equivalent to 94 units per 1,000 people aged 75 and over. The analysis shows a higher proportion of the stock is in the affordable than the market sector (80% vs. 20%).

Table 77: Current Supply of Specialist Housing for Older People

Type of housing	Market	Affordable	Total	Supply per 1,000 aged 75+
Sheltered	233	877	1,110	87
Extra-Care	0	82	82	6
Total	233	959	1,192	94

Source: Housing LIN

Projected Future Need for Specialist Housing

10.26 A toolkit has been developed by Housing LIN, in association with the Elderly Accommodation Council and endorsed by the Department of Health, to identify potential demand for different types of specialist housing for older people and model future range of housing and care provision. It

suggests that there should be around 170 units of specialised accommodation (other than registered care home places) per thousand people aged over 75 years.

- 10.27 Table 78 below shows the change in the population aged 75 and over and what this would mean in terms of provision at 170 units per 1,000 population. The analysis shows a potential need for 1,154-1,418 units – 61-75 per annum, depending on the base projection used for analysis.

Table 78: Projected need for Specialist Housing for Older People (2014-33)

Projection	Population aged 75+ (2014)	Population aged 75+ (2033)	Change in population aged 75+	Specialist housing need (@ 170 units per 1,000)
Long-term migration	12,780	21,122	8,342	1,418
SHLAA constrained	12,845	19,635	6,791	1,154

Source: Derived from demographic projections and Housing LIN

Types and Tenures of Specialist Housing

- 10.28 Data already provided in this section showed the tenure of older person households – this identified a high level of owner-occupation, with the current supply having a higher proportion of affordable homes. Moving forward we would suggest that additional specialist housing should be split roughly 50:50 between the market and affordable sectors. This reflects the likely ‘market’ for specialist housing products as well as the current tenure profile of older person households (including the likely increase in the number of single person older households where levels of home ownership are slightly lower).
- 10.29 The analysis is not specific about the types of specialist housing that might be required; we would consider that decisions about mix should be taken at a local level taking account of specific needs and the current supply of different types of units available (for example noting that at present the dominant type of housing is traditional sheltered accommodation). There may also be the opportunity moving forward for different types of provision to be developed as well as the more traditional sheltered and Extra-Care housing, upon which the Council is developing local evidence.
- 10.30 Within the different models and assumptions made regarding the future need for specialist retirement housing (normally defined as a form of congregate housing¹⁴ designed exclusively for older people which usually offers some form of communal space, community alarm service and access to support and care if required), there may for example be an option to substitute some of this specialist provision with a mix of one and two bedroomed housing aimed to attract ‘early retired’ older people which could be designated as age specific or not. Such housing could be part of the

¹⁴ a type of housing in which each individual or family has a private bedroom or living quarters but shares with other residents a common dining room, recreational room, or other facilities

general mix of one and two bedroom homes but built to Lifetime Homes standards in order to attract retired older people looking to 'down size' but perhaps not wanting to live in specialist retirement housing.

- 10.31 Our experience when carrying out stakeholder work as part of other SHMA commissions typically identifies a demand for bungalows. Where developments including bungalows are found it is clear that these are very popular to older people downsizing. It should be acknowledged that providing significant numbers of bungalows involves cost implications for the developer given the typical plot size compared to floor space – although providing an element of bungalows could be given strong consideration on appropriate sites, allowing older households to downsize while freeing up family accommodation for younger households.
- 10.32 In LB Richmond, it is recognised that delivery of bungalows is unlikely, given limited land supply and the pressure to optimise housing delivery, however the Council should consider the extent to which older persons may be able to be provided with level access living, and a reliable lift to the accommodation floor level (or ideally accommodation on the ground floor).

Registered Care Housing

- 10.33 As well as the need for specialist housing for older people the analysis needs to consider Registered Care. At present (according to Housing LIN) there are around 818 spaces in nursing and residential care homes. Given new models of provision (including Extra-care housing) it may be the case that an increase in this number would not be required. There will however need to be a recognition that there may be some additional need for particular groups such as those requiring specialist nursing or for people with dementia.
- 10.34 As with the analysis of potential need for specialist accommodation, the analysis below considers changes to the number of people aged 75 and over who are expected to be living in some form of institutional housing. This is a direct output of the demographic modelling which indicates an increase of 502-553 people living in institutions over the 2014-33 period (26-29 per annum). This figure is important to note if the Council intends to include C2 class uses in their assessment of 5-year housing land supply (confirmed in the London Plan 2015 as part of non-conventional supply) as it will be necessary to include figures on both the need and supply side of the equation.

Table 79: Potential Need for Residential Care Housing

	Institutional population aged 75+ (2014)	Institutional population aged 75+ (2033)	Change in institutional population aged 75+
Long-term migration	795	1,348	553
SHLAA constrained	815	1,317	502

Source: Derived from demographic projections

People with Disabilities

10.35 This sub-section concentrates on the housing situation of people/households that contain someone with some form of disability. We have again drawn on Census data although it should be recognised that an analysis of people with disabilities is very strongly linked with the above analysis about older people.

10.36 Table 80 below shows the proportion of people with a long-term health problem or disability (LTHPD) and the proportion of households where at least one person has a LTHPD. The data suggests that across Richmond-upon-Thames some 19% of households contain someone with a LTHPD. This figure is lower than the equivalent figure for each of London and England. The figures for the population with a LTHPD again show a lower proportion when compared with the other areas studied (an estimated 11% of the population of Richmond-upon-Thames have a LTHPD).

Table 80: Households and people with Long-Term Health Problem or Disability (2011)

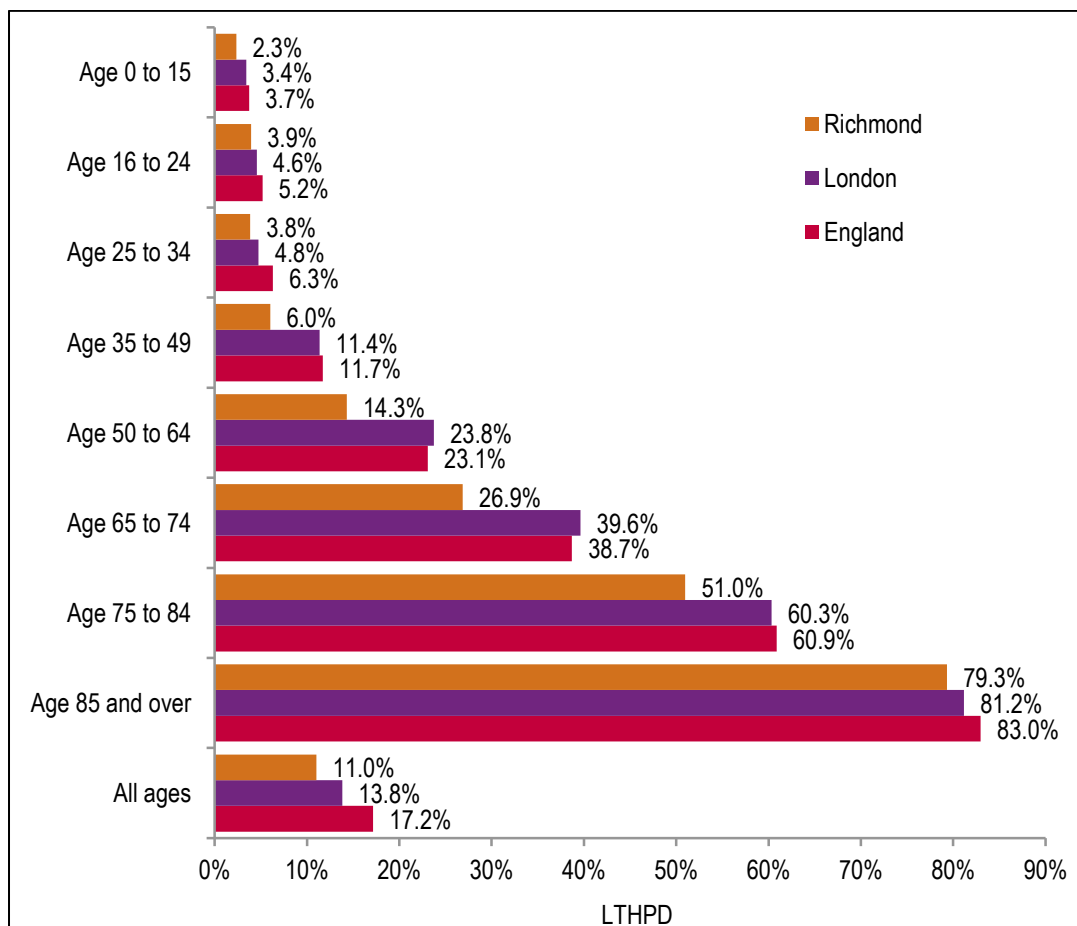
Area	Households containing someone with health problem		Population with health problem	
	Number	%	Number	%
Richmond-upon-Thames	14,830	18.6%	21,447	11.5%
London	732,552	22.4%	1,157,165	14.2%
England	5,659,606	25.7%	9,352,586	17.6%

Source: 2011 Census

10.37 To some degree the finding of a lower level of people/households with a LTHPD in Richmond-upon-Thames is surprising, this is because health issues are strongly linked to age and previous analysis has shown that the Borough has an older population (at least when compared with London). Therefore, the table below shows the age bands of people with a LTHPD. It is clear from this analysis that those people in the oldest age bands are more likely to have a LTHPD – for example some 79% of people aged 85 and over have a LTHPD. It should be noted that the base for the figure below is slightly different to the above table in that it excludes people living in communal establishments. One explanation for the lower level of people with a LTHPD is that the Borough has one of the highest ‘healthy life expectancies’(the years where a person is in good health) in the country.

10.38 When compared with other areas it is notable for all age groups that levels of LTHPD are relatively low and so the finding that a lesser proportion of the population has a LTHPD in Richmond-upon-Thames is due to age specific disability rates despite the age structure of the population.

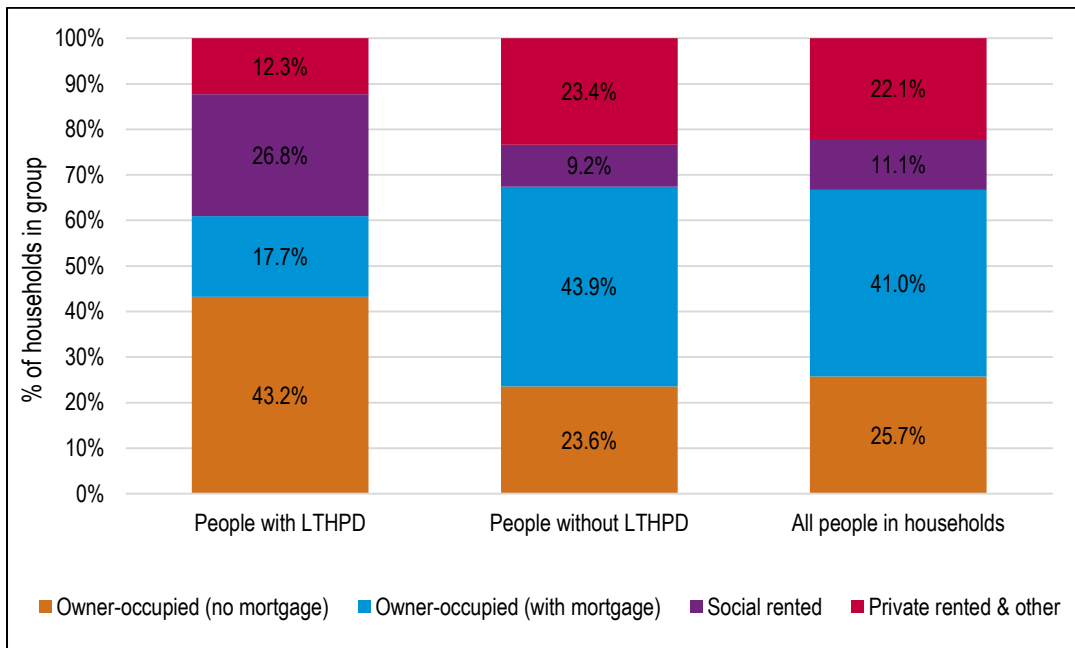
Figure 55: Population with LTHPD in each Age Band



Source: 2011 Census

10.39 Figure 56 below shows the tenures of people with a LTHPD – it should be noted that the data is for population living in households rather than households and is therefore not comparable with other tenure analysis provided in this section. The analysis clearly shows that people with a LTHPD are more likely to live in social rented housing and are also more likely to be outright owners (this will be linked to the age profile of the population with a disability). Given that typically the lowest incomes are found in the social rented sector and to a lesser extent for outright owners the analysis would suggest that the population/households with a disability are likely to be relatively disadvantaged when compared to the rest of the population.

Figure 56: Tenure of people with LTHPD – Richmond-upon-Thames



Source: 2011 Census

10.40 It seems clear that a substantial increase in households with mobility problems and/or a physical disability can be expected, in particular driven by the growing older population with those over 65 expected to increase by 27% over the period to 2033. In this context it is reasonable to continue to apply the requirement for 10% wheelchair accessible accommodation, as set out in the London Plan, to the optional higher Building Regulation M4(3).

BME Households

10.41 Black or Minority Ethnic (BME) households, as a group, are quite often found to have distinct characteristics in terms of their housing needs, or may be disadvantaged in some way. From 2011 Census data we find that around 26% of the population of Richmond-upon-Thames came from a non-White (British/Irish) background. This figure is significantly below that found across London (53%) but slightly above the national average (of 19%). The key BME group in Richmond-upon-Thames is White: Other White, which makes up 11.9% of all people in the Borough.

Table 81: Black and Minority Ethnic Population (2011)

Ethnic Group	Richmond-upon-Thames	London	England
White: British	71.4%	44.9%	79.8%
White: Irish	2.5%	2.2%	1.0%
White: Gypsy or Irish Traveller	0.1%	0.1%	0.1%
White: Other White	11.9%	12.6%	4.6%
Mixed: White and Black Caribbean	0.7%	1.5%	0.8%
Mixed: White and Black African	0.4%	0.8%	0.3%
Mixed: White and Asian	1.5%	1.2%	0.6%
Mixed: Other Mixed	1.0%	1.5%	0.5%
Asian: Indian	2.8%	6.6%	2.6%
Asian: Pakistani	0.6%	2.7%	2.1%
Asian: Bangladeshi	0.5%	2.7%	0.8%
Asian: Chinese	0.9%	1.5%	0.7%
Asian: Other Asian	2.5%	4.9%	1.5%
Black: African	0.9%	7.0%	1.8%
Black: Caribbean	0.4%	4.2%	1.1%
Black: Other Black	0.2%	2.1%	0.5%
Other ethnic group: Arab	0.6%	1.3%	0.4%
Any other ethnic group	1.0%	2.1%	0.6%
Total	100.0%	100.0%	100.0%
Total population	186,990	8,173,941	53,012,456
% non-White (British/Irish)	26.0%	53.0%	19.3%

Source: 2011 Census

- 10.42 Since 2001 the BME population in the Borough can be seen to have increased significantly as shown in the table below. We have condensed some categories together due to a slightly different list of potential groups being used in the 2011 Census when compared with 2001 data. The data shows that whilst the overall population of Richmond-upon-Thames has increased by 14,700 over the 10-year period there has been a notable increase in BME groups (all groups other than White (British/Irish)) of 16,800. The White (British/Irish) population has decreased by 1.5% compared to an increase of 53% in BME groups (all combined).
- 10.43 Looking at particular BME groups we see that the largest rise has been for the White: Other population – increasing by 6,100 persons over the ten years. The Asian or Asian British population has increased by a slightly lesser amount (5,600 persons) but does reflect over a 70% increase in the number of people from this ethnic group.

Table 82: Change in BME groups 2001 to 2011 – Richmond-upon-Thames

Ethnic Group	2001	2011	Change	% change
White (British/Irish)	140,460	138,348	-2,112	-1.5%
White - Other	16,325	22,377	6,052	37.1%
Mixed	3,797	6,780	2,983	78.6%
Asian or Asian British	7,968	13,607	5,639	70.8%
Black or Black British	1,614	2,816	1,202	74.5%
Other	2,171	3,062	891	41.0%
Total	172,335	186,990	14,655	8.5%
Non-White (British/Irish)	31,875	48,642	16,767	52.6%

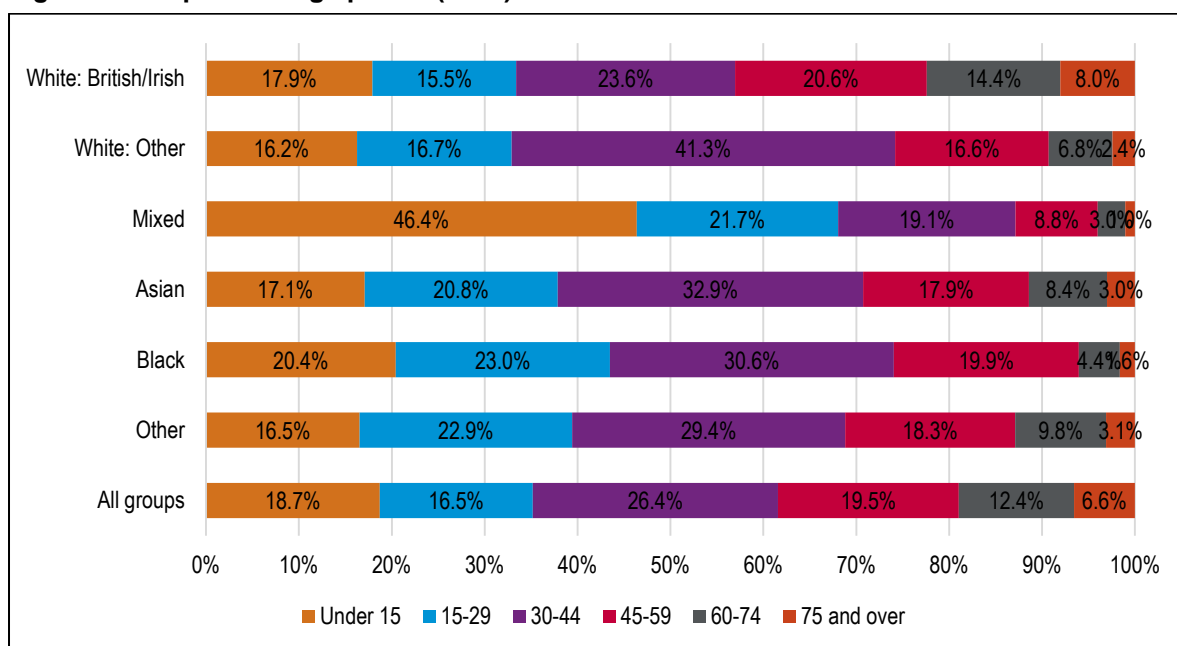
Source: Census 2001 and 2011

BME Household Characteristics

10.44 Census data can also be used to provide some broad information about the household and housing characteristics of the BME population in the Borough. The figure below looks at the population age structure of six broad age groups using data from the 2011 Census.

10.45 The age profile of the BME population is striking when compared with White: British/Irish people. All BME groups are considerably younger than the White (British/Irish) group with people from a Mixed background being particularly likely to be aged under 15 when compared with any other group. The proportions of older persons are also notable with 22% of White; British/Irish people being aged 60 or over compared with all BME groups showing proportions of no more than 13%.

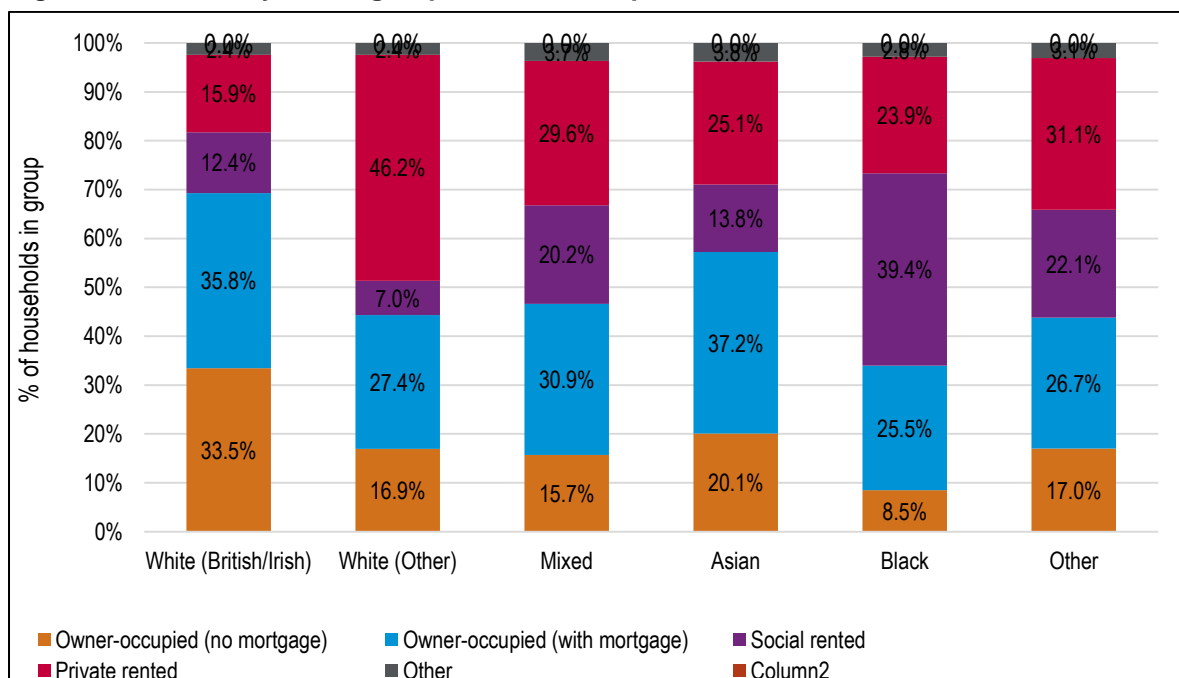
Figure 57: Population age profile (2011)



Source: Census (2011)

10.46 There are notable differences between the household characteristics of BME households compared with the White: British population. Figure 58 below indicates that all BME groups are significantly less likely to be owner-occupiers and all groups are far more likely to live in private rented accommodation. Arguably the starkest trend is the 46% of White (Other) households living in the private rented sector. This group would include recent EU nationals and people working in the UK from Australia and New Zealand. These groups would naturally access private renting as the first and easiest housing option in a new country. Additionally the borough is an attractive location for corporate lettings and has a buoyant market. This has attracted a large number of international residents some of whom may be represented within this White (Other) group.

Figure 58: Tenure by ethnic group – Richmond-upon-Thames



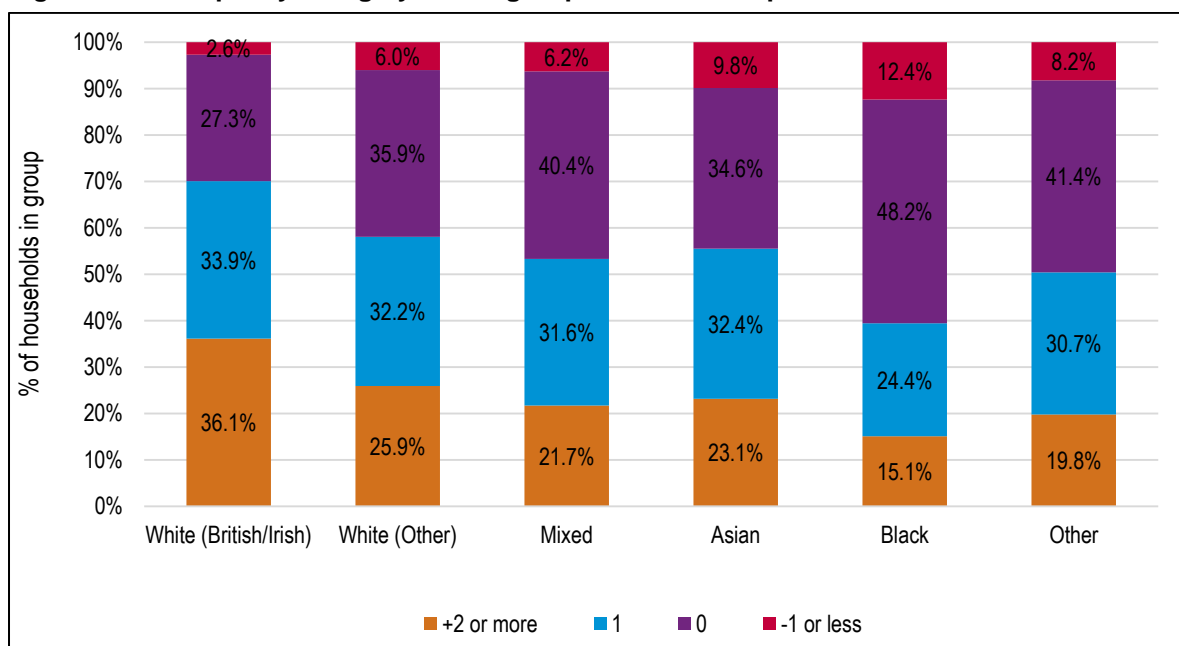
Source: 2011 Census data (from NOMIS)

10.47 The strong representation of BME households in the Private Rented Sector means that they are more likely to be affected by the changes discussed to Local Housing Allowance (particularly as the sector in the Borough shows a strong representation of LHA Claimants). Although it should also be noted that those claiming Housing Benefit only represent a small number of PRS residents (16%).

10.48 As BME communities mature over time, the level of owner occupation may increase. The pace at which this happens may be influenced by economic opportunities available as well as the level of enterprise within the local community. For some communities there may be support mechanisms which can work within the community, such as availability of interest free loans or support raising a deposit to buy a home, depending on cultural factors.

10.49 Figure 59 below shows ‘occupancy ratings’ by BME group. This is based on the bedroom standard where a positive figure indicates under-occupancy and negative figures suggest some degree of over-crowding. BME groups are more likely to be overcrowded (i.e. have a negative occupancy rating) than White (British) households. In particular, the Census data suggests that around 12% of Black households are overcrowded along with 10% of the Asian group – this compares with only 3% of the White (British) group. Levels of under-occupancy amongst BME communities are generally low.

Figure 59: Occupancy rating by ethnic group – Richmond-upon-Thames



Source: 2011 Census data (from NOMIS)

Households with Children (family households)

10.50 The number of families in LB Richmond-upon-Thames (defined for the purpose of this assessment as any household which contains at least one dependent child) totalled 23,600 as of 2011; accounting for 30% of households – a similar figure to that seen across both London and England. The demographic projection (linked to long-term migration trends) suggests that the number of children (aged Under 15) is expected to increase by 5% from 2014 to 2033 (an increase of around 1,800) although a SHLAA constrained projection suggests a decrease in this age group (of 3,900 people – 11%). When compared with other areas the proportion of married couple households is particularly notable (20%) as well as the low proportion of lone parents (5% of all households).

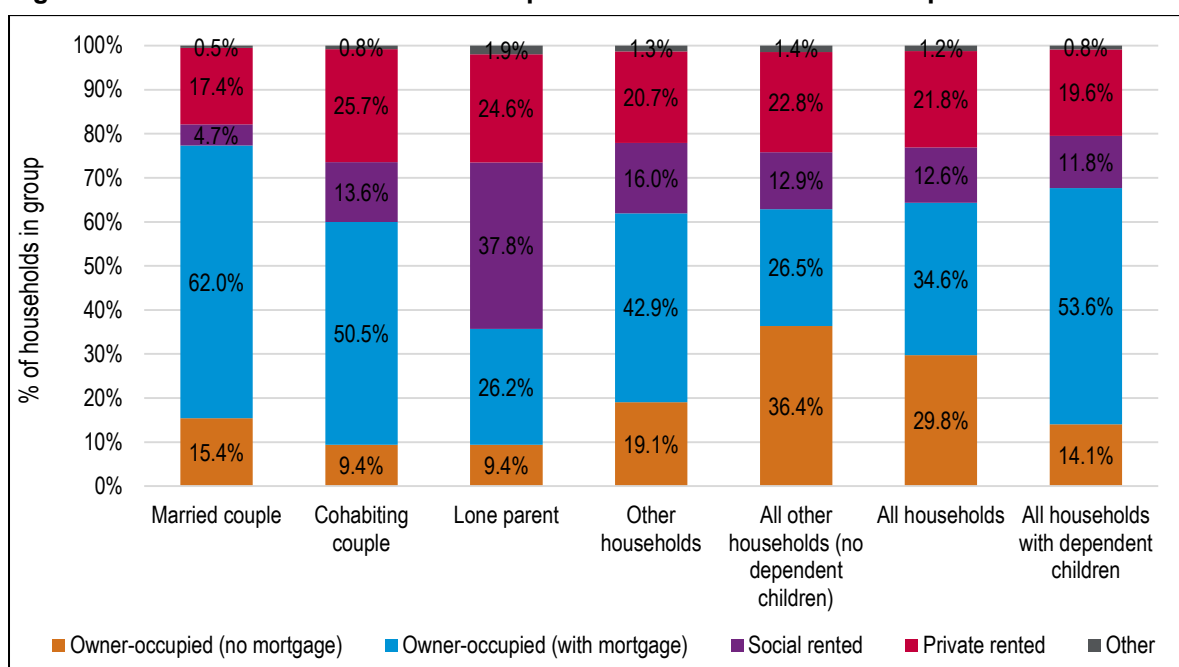
Table 83: Households with Dependent Children (2011)

Household Type	Richmond-upon-Thames		London	England
	Number	%	%	%
Married couple	15,747	19.7%	15.0%	15.3%
Cohabiting couple	2,409	3.0%	2.8%	4.0%
Lone parent	3,882	4.9%	8.5%	7.1%
Other households	1,610	2.0%	4.6%	2.6%
All other households (no dependent children)	56,187	70.4%	69.1%	70.9%
Total	79,835	100.0%	100.0%	100.0%
Total with dependent children	23,648	29.6%	30.9%	29.1%

Source: ONS (2011 Census)

10.51 Figure 60 below shows the current tenure of households with dependent children. There are some considerable differences by household type with lone parents having a very high proportion living in the social rented sector and also in private rented accommodation. Only around 36% of lone parent households are owner-occupiers compared with 77% of married couples with children.

Figure 60: Tenure of households with dependent children – Richmond-upon-Thames

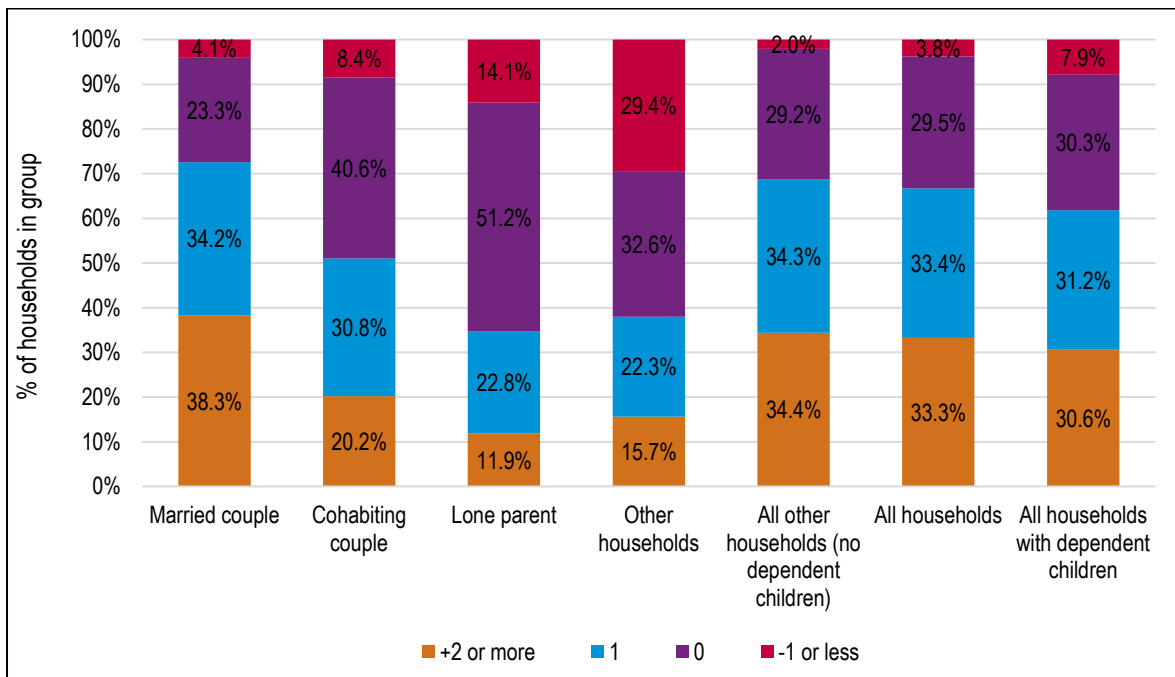


Source: 2011 Census

10.52 Overcrowding is often a key theme when looking at the housing needs of households with children and the figure below shows that households with children are about four times more likely than other households to be overcrowded. In total, some 8% of all households with dependent children are overcrowded and included within this the data shows 14% of lone parent households are

overcrowded along with 29% of 'other' households with dependent children. Other than for married couple households, levels of under-occupancy are also very low.

Figure 61: Occupancy rating and households with dependent children



Source: 2011 Census data (from NOMIS)

Young People

10.53 Providing for the needs of younger person households is an important consideration for the Council. Given ageing populations, the ability to retain young people in an area can assist in providing a more balanced demographic profile as well as providing a vital part of the local workforce. Young people may however find barriers to accessing housing given typically low incomes and potential difficulties in securing mortgage finance due to deposit requirements. Additionally, LHA payments may limit choice for under-35s requiring private rented homes.

10.54 The demographic projections suggest that in 2014 there were around 12,400 households headed by someone aged under 35 and that this is expected fall over the period to 2033 – this is regardless of the projection used and with a SHLAA constrained position the number of households headed by someone aged under 35 is projected to fall by about 3,400.

10.55 As well as households headed by a younger person, there will be others living as part of another household (typically with parents). The table below shows the number of households in the Borough with non-dependent children. In total, some 8% of households (6,100) contain non-dependent

children. This may to some degree highlight the difficulties faced by young people in accessing housing. Young people may be less likely to be eligible for social housing (they are unlikely to be in priority need if living with parents), have lower household incomes and have difficulty in accessing the owner-occupied sector due to mortgage constraints and deposit requirements. All of these factors contribute to the current trend for young people moving in with or continuing to live with parents. That said, the proportion of households with non-dependent children is low when compared with London and England.

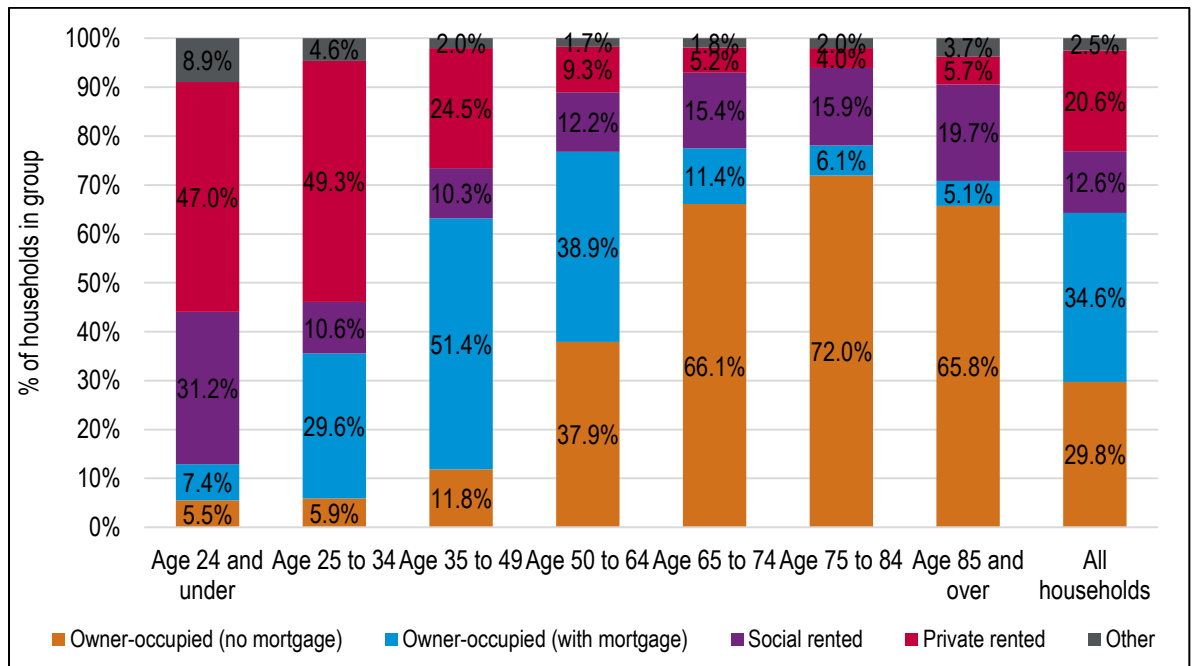
Table 84: Households with non-dependent children (2011)

	Richmond-upon-Thames		London	England
	Number	%	%	%
Married couple	3,532	4.4%	4.8%	5.6%
Cohabiting couple	230	0.3%	0.4%	0.5%
Lone parent	2,382	3.0%	4.1%	3.5%
All other households	73,691	92.3%	90.7%	90.4%
Total	79,835	100.0%	100.0%	100.0%
Total with non-dependent children	6,144	7.7%	9.3%	9.6%

Source: ONS (2011 Census)

10.56 When considering households that are currently headed by a younger person we can use 2011 Census data to look at some key characteristics. The figure below shows the tenure groups of these households (compared with other age groups). The data clearly shows that very few younger households are owner-occupiers with a particular reliance on the private rented sector and to a lesser degree social rented housing.

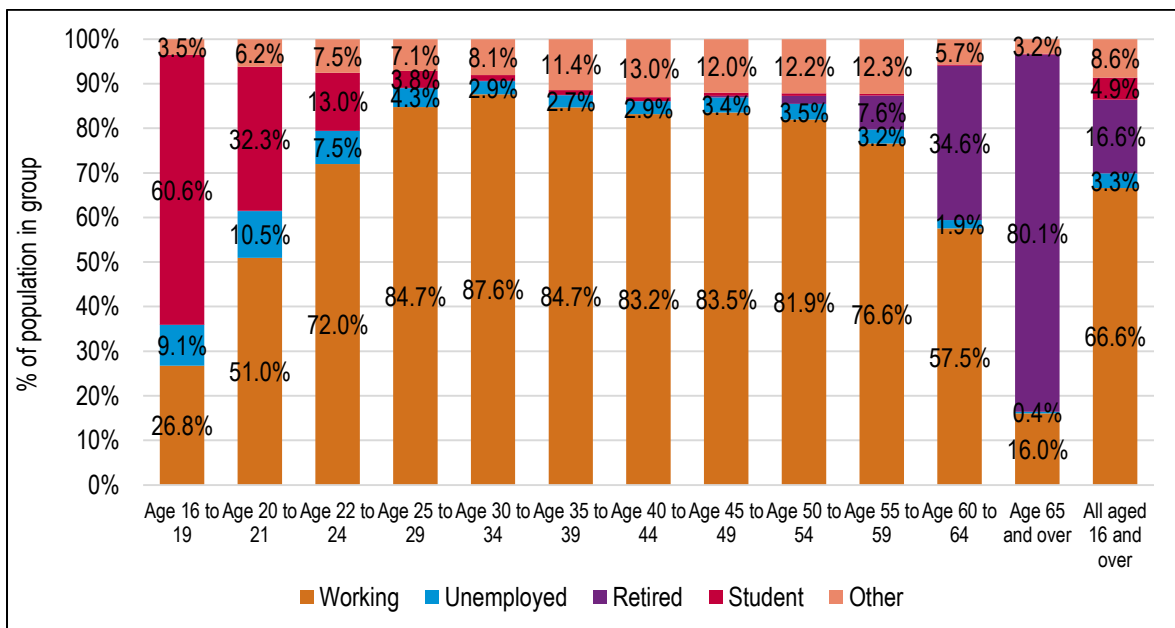
Figure 62: Tenure by age of HRP – Richmond-upon-Thames



Source: 2011 Census

10.57 Census data can also be used to look at economic activity rates; including employment and unemployment levels. Data about this is shown in the figure below. The data shows that younger people are more likely to be unemployed than other age groups. The data shows that of the population aged 16-34 some 5.4% are unemployed – included within this we see an unemployment rate of 10.5% for those aged 20-21 and 9.1% in the 16-19 age group.

Figure 63: Economic activity by age – Richmond-upon-Thames



Source: 2011 Census

Student Households

- 10.58 Student accommodation needs are identified in the London Plan as a strategic issue. The London Plan recognises the pressing need for more homes in London and need to boost significantly the supply of housing. It identifies a need for between 49,000 and 62,000 homes per year across London (for the 2015-36 and 2015-26 periods respectively). Paragraph 3.53C outlines that student accommodation is counted as part of overall housing provision.
- 10.59 Paragraphs 3.51 – 3.53 deal specifically with student housing. Policies on student accommodation in the London Plan were informed by findings from the Mayor’s Academic Forum. Paragraph 2.52 emphasises the importance of providing student accommodation to supporting the attractiveness and growth potential of London’s universities, identifying that there could be a requirement for some 20,000 – 31,000 places over the 10 years to 2025¹⁵ and that new provision may also tend to reduce pressure on other elements of the housing stock currently occupied by students.
- 10.60 Paragraph 2.53 however identifies that meeting student demand “should not compromise capacity to meet the need for conventional housing, especially affordable family homes, or undermine policy to secure mixed and balanced communities.” Paragraph 3.53A goes on to outline that:

¹⁵ based on Mayor’s Academic Forum (2014) *Strategic planning issues for student housing in London*

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;*
- *secure accommodation which is more affordable for the student body as a whole; and*
- *ensure that in identifying and addressing local and strategic needs for student accommodation, boroughs are informed by working with other relevant partners as indicated above.*

- 10.61 The Plan also outlines that where 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 specific educational institutions. Where there is not an undertaking with a specific academic institution(s), it sets out that 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.
- 10.62 London Borough of Richmond includes the campus of St Mary's University situated in Twickenham and Richmond American International University in London located around East Twickenham. Basing on the figures for 2014/ 2015 from Higher Education Statistics Agency (HESA) and admission data for Richmond American International University we estimate that there are 6,835 students attending the above universities. The Council is aware that St Mary's University is in the process of developing a Masterplan, which proposes an increase in the number of students.
- 10.63 The Universities provide some accommodation for their students. In the planning terms, there is however a strategic need for student accommodation across London. The reality is that London Borough of Richmond is outside central London areas where most of the university activity occurs. The figure below provides an overview of the private student halls across London. The highest concentration of the student accommodation tends to be located in a close proximity to the universities. These are situated across Central and Northern areas of London.
- 10.64 We therefore argue that the provision of the student accommodation seems currently sufficient to meet the local students' needs. Any plans for St Mary's University will need to form part of a wider accommodation strategy taking account of capacity and infrastructure. Further to that, given the location of the borough and proximity to central London areas, LB Richmond is not directly affected by the students attending central London universities such as LSE, UCL, Kings College, Imperial College of London or City University London.

10.65 Agent’s consultation carried out as a part of housing market assessment indicated a small proportion of students in the PRS. This was mainly due to the proximity and more residential character of the areas across the borough.

Figure 64: Map of Private Student Halls of Residents



Source: www.accommodationforstudents.com

10.66 The demographic modelling in this report assumes that the institutional population of those under 75 remains constant (in absolute terms). Thus any delivery of student housing can be counted towards the housing requirement and meeting OAN on the basis of the expected number of dwellings from the general housing stock that it would release.

Self- and Custom-build Housing

10.67 SHMAs need to investigate the contribution that self-build makes toward the local supply. *Laying the Foundations – a Housing Strategy for England 2010* sets out that only one in 10 new homes in Britain were custom built – a lower level than in other parts of Europe. It identifies barriers to self or custom-build development as including:

- A lack of land;
- Limited finance and mortgage products;
- Restrictive regulation; and
- A lack of impartial information for potential custom home builders.

- 10.68 Government aspires to make self-build a 'mainstream housing option' by making funding available to support self-builders and by asking local authorities to champion the sector. Up to £30m of funding has been made available via the Custom Build programme administered by the HCA to provide short-term project finance to help unlock group custom build or self-build schemes. The fund can be used to cover eligible costs such as land acquisition, site preparation, infrastructure, S106 planning obligations etc.
- 10.69 Local authorities are now required to establish and maintain a register of those interested in building or commissioning their own home. This was introduced by the Self- and Custom Homebuilding Act 2015, the Self-Build and Custom Housebuilding (Register) Regulations 2016 and accompanying Planning Policy Guidance from 1 April 2016.
- 10.70 The Council's self-build and custom house-building register was opened in May 2016. As of September 2016 there were 346 individuals and 2 associations registered although of those registered, only 28 currently live in the Borough.
- 10.71 The GLA had also set up a pilot register from August 2015, at regional level to inform its planning and housing strategies. As of March 2016, there were 20 people on the register already living in Richmond and there are 320 who would like to build in the borough. There is not yet any data available from the Council's borough level Register which has recently been set up.
- 10.72 Given this is a new requirement on local authorities, and Registers have only recently been established – they do not yet provide comprehensive information on demand.
- 10.73 Quantitative information regarding levels of demand for self-build is thus hard to come by. The website BuildStore currently (as at April 2016) has 83 persons registered on its Custom-Build Register as looking to build accommodation in Richmond; and 751 active Plot Search subscribers across the Borough.
- 10.74 From a development point of view, key issues with this market are associated with skills and risk: whilst there may be a notable number of people with an 'interest' in self-build, there is in some circumstances a significant financial outlay, risk and time-cost associated with self-build.
- 10.75 In Richmond, evidently land supply is a potential constraint on growth, along with high existing land values. There is anecdotal evidence that people are undertaking self-build themselves, for example through one for one demolitions and claiming CIL exemption on the basis of self-build.

Gypsy and Travellers Need

- 10.76 This assessment does not review Gypsy and Traveller's needs. A separate research paper was conducted separately by the Council and published in June 2016. The Report can be found at www.richmond.gov.uk/local_housing_assessment.htm.
- 10.77 The paper sets out the initial findings of the surveys in 2013 and 2015 which suggests there is no demonstrable need for additional pitches, although there is a need to protect the existing site and there may be opportunities for other innovative solutions to improve support to address needs.

Implications

- The evidence indicates that a significant growth in the population in older age groups can be expected, with the number of people aged 65 and above expected to increase by 9,400-13,300 (34-47%) from 2014 to 2033. Demographic change is likely to see a requirement for additional levels of care/support along with provision of some specialist accommodation in both the market and affordable sectors – it is estimated that around 61-75 units of new provision per annum should be some form of specialist housing for older people along with an additional 26-29 residential care bedspaces per annum. However, decisions about types of specialist housing that are required will need to be taken at a local level taking account of specific needs and existing supply.
- The number of people with disabilities is closely related to the age of the population and many of the conclusions related to older persons are relevant for this group. Demographic projections suggest a 83-89% increase in the population aged over 85 from 2014 to 2033 with Census data suggesting that around 80% of this age group have some level of disability. This provides a strong justification for seeking 10% of new dwellings as wheelchair-accessible, in line with the London Plan, to the optional higher Building Regulation M4(3).
- The Borough is an attractive location for families. The evidence however indicates that 8% of households (6,100 households) contain non-dependent children. Provision of affordable options will be important in enabling young people to move out of the family home.
- There is a growing BME population in the Borough, particularly of White Other and Asian/Asian British origin. This is relatively younger than the wider population, with a higher proportion living in the Private Rented Sector.
- The Borough has a small student population. The evidence does not suggest that this has a particular impact on the local housing market, but this should continue to be monitored. A strategic need for additional student accommodation is identified across London.
- Self- and custom build housing is a potential growth sector. A modest level of existing demand emanating from the Borough is shown through existing evidence. Evidently land supply is a potential constraint on growth.

11 CONCLUSIONS

- 11.1 This Strategic Housing Market Assessment Report has sought to consider the overall need for housing, and the need for different types of homes and the housing needs of different groups within the Borough's population.
- 11.2 The Borough's housing market is closely integrated with those in other West and South West London Boroughs, and forms part of a wider London housing market that extends across the Capital and has links and inter-relationships into the Home Counties. LB Richmond's strongest links are with Hounslow, Wandsworth and Kingston Boroughs. The evidence points to a net inflow of those in their late 20s and 30s into the Borough seeking family-sized accommodation. Demographic trends have seen an increase in all age groups over 40, together with children, in the recent past. There is a modest net out-migration of those in all age groups over 40 – this is to a range of areas outside London, including to Surrey.
- 11.3 The largest age group in the Borough's are those aged 30-48; with the Borough having an older population structure than London as a whole. Around 83% of the population are White British and it is not as ethnically diverse as many other London boroughs; but the population of BME groups (particularly White Other and Asian/ Asian British) has been growing. The Borough is relatively affluent, with more than two thirds of its resident population employed in professional occupations.

Overall Housing Need

- 11.4 The Borough's population can be expected to grow. Over the 2001-14 period, the population grew by an average of 0.8% per annum, although in the last year growth was only 0.6%. The analysis in this report has reviewed a range of demographic projections. It concludes that the GLA long term (12-year) migration trends provide a reasonable assessment of demographic trends, if land supply constraints are 'left aside.' These expect 17.2% population growth between 2014-33 in the Borough, and result in a housing need for 1,047 dwellings per annum.
- 11.5 In drawing conclusions on the potential OAN, these figures should be regarded as a minimum level of provision. Economic factors do not provide an upside to this assessment of need: they show a need for 963 homes per annum based on forecasts which potentially overstate the likely performance of the Borough's economy given in particular a diminishing stock of office floorspace available to accommodate jobs growth. In respect of affordability issues, in terms of market signals and affordable housing need, whilst in an unconstrained situation these might be considered as justifying higher housing provision relative to the demographic need, this is unrealistic set against a

constrained land supply. A notional 'unmet housing need' should be measured against the demographic-based need set out (1,047 dpa).

- 11.6 In reality, the supply of available land which is suitable for development is likely to influence future development trends and for the Council to consider in setting policy targets. Taking account of land supply, the London Plan sets a minimum housing target for 315 homes per annum. This is a minimum and development sites are expected to optimise housing output taking account of location and context, public transport accessibility and design standards.
- 11.7 A constrained land supply is likely to influence the migration and household formation trends moving forwards. The GLA SHLAA-constrained demographic modelling expects lower population growth and a stronger relative ageing of the population, and in-migration of younger persons is more restricted. The population in most age groups under 45 is expected to fall. In absolute numbers, it expects population growth of 14,063 to 2033 (7.3%); however in line with past trends population growth could feasibly be stronger – but this would likely be supported by greater intensity of use of housing including by younger households.

Affordable Housing Need

- 11.8 Private sector housing costs in the Borough have continued to grow since the market downturn. House prices increased by third between 2010-15 and are higher than in many Outer London Boroughs. Rental costs have increased 39% between 2011-15. In both cases this represents significant growth in housing costs in real terms. The evidence suggests entry level house prices in the Borough in 2014 were 14.5 times the incomes of younger households – significantly above the Outer London average of 9.8.
- 11.9 Affordable housing need has been assessed using the Basic Needs Assessment Model, as set out in Planning Practice Guidance. This considers the notional need from all households requiring financial support, and compares this to the turnover of existing affordable housing. Set against a limited supply of affordable housing and high costs for market housing for sale and rent, a high need for affordable housing is shown – from 964 households per annum. This level of need is assessed on an unconstrained basis.
- 11.10 The high level of affordable housing need clearly justifies policies seeking to maximise the delivery of affordable housing in the Borough, so far as this does not render development unviable. The Council's current policies seek 50% on-site affordable housing on development schemes of over 10 dwellings, and contributions to affordable housing on smaller sites. The needs evidence will need to

be brought together with a Plan-wide Viability Assessment in drawing conclusions on future policies for affordable housing provision, but would justify a continuation of the current policy approach.

Need for Different Types of Homes

- 11.11 Against a context of a constrained land supply, there are potentially some policy choices to be made regarding the types of homes which are built. The SHMA has modelled the need for different types of market and affordable homes, taking account of demographic dynamics and wider issues. It concludes that a mix of homes of different sizes should be sought. This mix is based on the long term demographic scenario.
- 11.12 In the affordable sector there is a greater relationship between the sizes of households and the sizes of homes they occupy, and thus a greater need is shown for smaller properties than in the market sector. Market demand in the borough is particularly for family housing; although it will be important also to provide attractive housing for older households looking to downsize. The following conclusion on housing mix are drawn:

Table 85: Mix of Homes Needed

	1-bed	2-bed	3-bed	4+ bed
Market	10-15%	25-30%	30-35%	25-30%
Affordable	35-40%	30-35%	20-25%	5-10%
All dwellings	25-30%	25-30%	25-30%	20-25%

- 11.13 The mix set out takes into account a range of factors including the need to support downsizing, closer alignment between need and aspiration in the affordable sector and also longer term demographic trends which may or may not be evident in the short term. These mix conclusions are not intended to be applied rigidly to every site, and should be considered alongside the site context and specific local evidence on affordable housing need from the Council’s Housing Register to inform setting of policy targets.
- 11.14 A slightly alternative view on the mix can be drawn from analysis of the constrained growth scenario and also from the housing register. The constrained growth scenario would indicate a need for more 3 and 4 bedroom market homes at the expense of fewer 1 and 2 bedroom homes. On the affordable side the constrained scenario would require significantly more 1 bedroom properties with reductions in all other sizes.
- 11.15 The housing register would indicate a lower level of provision of one and three bedroom homes (relative to the modelled outputs) and slightly higher proportions of 2 and 4+ bedroom homes.

- 11.16 For policy making purposes both these approaches could be considered robust. It should also be recognised that local authorities have statutory homelessness responsibilities towards families with children, and would therefore prioritise accordingly. Other policy considerations such as overcrowding in the social housing sector and making best use of existing stock would need to be taken into account, and suggest a need for larger family sized affordable homes.
- 11.17 The modelling indicates that the current policy seeking 80% social/ affordable rented housing and 20% intermediate housing remains appropriate.
- 11.18 The SHMA has though also assessed the need for Starter Homes. A potential need for between 105 – 136 Starter Homes per year is shown, which represents 10-13% of the (unconstrained) demographic need and/or the affordable housing need. If Starter Homes are included within the definition of affordable housing, an 80/ 20 split between social/ affordable rent and intermediate/ starter homes would still remain relevant.
- 11.19 A growing older population is expected to exert a key influence on future demand. 33.5% growth in the population over 65 is expected in the SHLAA-constrained demographic scenario. Linked to a growing older population, the number of households with dementia is expected to increase by 58% (+ 1210 households) and those with mobility problems by 46% (+2,441 households). It will be important to provide a range of housing options and support – including specialist housing, adaptations to properties and floating support.
- 11.20 In regard to specialist accommodation for older persons, a need for between 61-75 units per annum is identified (drawing on the SHLAA constrained scenario). This forms part of the C3 need for housing. This would include provision of extra-care and sheltered accommodation. However, decisions about types of specialist housing that are required will need to be taken at a local level taking account of specific needs and existing supply.
- 11.21 In addition, the modelling indicates a need for 26-29 residential care bedspaces. This would fall within a C2 use, and is separate from the overall need for housing assessed herein.
- 11.22 With a growing older population, the numbers of people with disabilities is expected to increase. The London Plan requirement for 10% wheelchair accessible dwellings is entirely supported by the SHMA evidence.
- 11.23 More widely, the Borough is an attractive location for families. The evidence however indicates that 8% of households (6,100 households) contain non-dependent children. Provision of affordable options will be important in enabling young people to move out of the family home.

- 11.24 There is a growing BME population in the Borough, particularly of White Other and Asian/ Asian British origin. This is relatively younger than the wider population, with a higher proportion living in the Private Rented Sector.
- 11.25 The Private Rented Sector has been growing, but is not as large as in other parts of London. The Borough has a small student population. The evidence does not suggest that this has a particular impact on the local housing market, but this should continue to be monitored. A strategic need for additional student accommodation is identified across London.
- 11.26 The Council might wish to consider policies regarding development of private rented accommodation. This is a growing sector across London, and the SHMA points to the likelihood of its continuing growth and importance in accommodating younger people in the Borough. In doing so, it should recognise that scheme viability is different from mixed tenure housing developments. A bespoke policy regarding affordable housing might be considered.
- 11.27 Self- and custom build housing is a further potential growth sector. A modest level of existing local demand is shown through existing evidence. Evidently land supply is a potential constraint on growth. The Council has recently set up a register of those interested in self- and custom-build development.

Appendix 7



Report to the London Borough of Richmond upon Thames

by Andrew Seaman BA (Hons) MA MRTPI

**an Inspector appointed by the Secretary of State for Housing, Communities and Local
Government**

Date: 26 April 2018

Planning and Compulsory Purchase Act 2004

(as amended)

Section 20

Report on the Examination of the Richmond upon Thames Local Plan

The Plan was submitted for examination on 19 May 2017

The examination hearings were held between 26th September and 12th October 2017

File Ref: PINS/L5810/429/10

Abbreviations used in this report

AA	Appropriate Assessment
AMR	Annual Monitoring Report
DCLG	Department for Communities and Local Government ¹
DtC	Duty to Co-operate
EqIA	Equalities Impact Assessment
Framework	National Planning Policy Framework
GB	Green Belt
HMA	Housing Market Area
HRA	Habitats Regulations Assessment
KOA	Key Office Areas
LDS	Local Development Scheme
LGS	Local Green Space
MM	Main Modification
MoL	Metropolitan Open Land
OAN	Objectively assessed need
OOLTI	Other Open Land of Townscape Importance
OSNI	Other Site of Nature Importance
PPG	Planning Practice Guidance
PPTS	Planning Policy for Traveller Sites
SA	Sustainability Appraisal
SCI	Statement of Community Involvement
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
WMS	Written Ministerial Statement
the Plan	Local Plan

¹ Now Ministry for Housing, Communities and Local Government

Non-Technical Summary

This report concludes that the London Borough of Richmond upon Thames Local Plan (the Plan) provides an appropriate basis for the planning of the Borough, provided that a number of main modifications [**MMs**] are made to it. The Council has specifically requested me to recommend any MMs necessary to enable the Plan to be adopted.

The MMs all concern matters that were discussed at the examination hearings and the majority were proposed by the Council. Following the hearings, the Council prepared schedules of the proposed modifications and produced an addendum to the Sustainability Appraisal in their regard. The MMs were subject to public consultation over a six week period. In some cases I have amended their detailed wording and/or added consequential modifications where necessary.

I have recommended their inclusion in the Plan after considering all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- To ensure an adequate acknowledgement of the role of Neighbourhood Planning.
- To ensure the approach to issues including design, heritage, local character and amenity considerations is justified and effective in its implementation;
- To clarify the approach towards housing delivery, particularly in seeking to maximise the delivery of affordable housing;
- To ensure a robust and justified approach to open space, green infrastructure, other open land and local green space;
- To ensure a justified and robust approach to the Borough Centres and issues affecting employment, office and industrial land;
- To ensure there is a clarity of approach towards the Plan's Site Allocations
- To ensure adequate reference to environmental and air quality issues; and
- To ensure adequate monitoring of the Plan is proposed to ensure its effectiveness.

Introduction

1. This report contains my assessment of the Local Plan in terms of Section 20(5) of the Planning & Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate (DtC). It then considers whether the Plan is sound and whether it is compliant with the legal requirements. The National Planning Policy Framework (the Framework) (paragraph 182) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound plan. The London Borough of Richmond upon Thames Local Plan (the Plan), submitted in May 2017 is the basis for my examination. It is the same document as was published for consultation in January 2017.

Main Modifications

3. In accordance with section 20(7C) of the 2004 Act, the Council requested that I should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and thus incapable of being adopted. My report explains why the recommended MMs, all of which relate to matters that were discussed at the examination hearings, are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2**, **MM3** etc, and are set out in full in the Appendix.
4. Following the examination hearings, the Council prepared a schedule of proposed MMs and carried out sustainability appraisal (SA) of them. The MM schedule was subject to public consultation for six weeks. I have taken account of the consultation responses in coming to my conclusions in this report and in this light I have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity². None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and SA that has been undertaken.

Policies Map

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map includes the set of plans identified as 'Proposals Map Changes Local Plan – Publication Version for consultation' as set out in SD2.
6. The policies map is not defined in statute as a development plan document and so I do not have the power to recommend main modifications to it.

² MMs 7, 20, 23

However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map which should be considered by the Council.

7. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in the Plan and the MMs.

Assessment of Duty to Co-operate

8. Section 20(5)(c) of the 2004 Act requires that I consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
9. The Council has provided a range of evidence to indicate how it has sought to discharge its duty. This includes the Duty to Cooperate Statement (SD12), the Legal Compliance Checklist (SD11), the Soundness self-assessment checklist (SD10) and relevant Hearing Statements. Within its specific London context, the combined evidence demonstrates adequately that the Council has sought to engage with relevant prescribed bodies on strategic matters.
10. Overall I am satisfied that where necessary the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has therefore been met.

Assessment of Soundness

Background

11. The Council has described the submitted Local Plan as a review of its extant development plan documents which include the Core Strategy of 2009, the Development Management Plan of 2011 and site specific policies from the saved Unitary Development Plan of 2005. It is intended that the Local Plan would replace these documents and be read alongside the retained Twickenham Area Action Plan of 2013 and the Joint West London Waste Plan of 2015. In this context the Local Plan represents more than a review and is a single cogent document setting out the vision and spatial strategy for the borough for the period until 2033. I have considered the Plan in this context.

Main Issues

12. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearings I have identified eight main issues upon which the soundness of the Plan depends. Under these headings my report deals with the main matters of soundness rather than responding to every point raised by representors.

Issue 1 – Is the Plan legally compliant? Does the Plan contain a robust spatial vision and justified strategic objectives consistent with national policy and in general conformity with the London Plan?

13. The Council has prepared an extensive evidence base that supports the submitted Local Plan. This evidence includes, the Local Development Scheme, the Legal Compliance Checklist, the Duty to Cooperate Statement, the

Soundness Self-Assessment Checklist, the Statement of Consultation, the Equalities Impact Assessment, the Habitats Regulation Assessment, the SA and correspondence conducted following submission of the plan for Examination. With regard to this and all other matters, I am satisfied that the Plan has been prepared in accordance with the statutory procedures and associated regulations.

14. The Plan iterates the role of the Borough Council and summarises its strategic context within London and within its community. It contains a clear Strategic Vision built around three primary themes which are supported adequately by the evidence base including the Corporate Plan and the Community Plan. These themes link to a series of logical Strategic Objectives. The Council has used the SA as a means of assessing the vision and objectives of the Plan and, overall, I am satisfied that they are justified, consistent with national policy and in general conformity with the London Plan.
15. The Council's evidence base, which includes various Statements of Common Ground, indicates how liaison has been had with neighbouring Boroughs and the Mayor of London. Notwithstanding individual matters referenced further within this report, the evidence indicates how the Council has sought to work cooperatively and satisfactorily on strategic matters. This is an ongoing commitment which will include contributions and liaison upon the emerging London Plan. The Council has recognised the potential importance of Neighbourhood Planning through suggested changes to the Plan which I consider necessary as main modifications to ensure consistency with national policy. I recommend accordingly (**MM1**).
16. Subject to the MM, the Plan is legally compliant and does contain a robust spatial vision and justified strategic objectives which are consistent with national policy and in general conformity with the London Plan.

Issue 2 – Is the approach of the Plan to 'Community Facilities' justified by the evidence base, consistent with national policy and will it be effective in operation?

17. Section 8 of the Plan addresses the provision of Community Facilities. The Council's evidence includes information from the Infrastructure Delivery Plan (IDP) in relation to the provision and needs for various types of social infrastructure and is supported by documents such as the Joint Strategic Needs Assessment, the School Places Planning Strategy, the Indoor Sports Facility Needs Assessment and the Council's overarching monitoring data.
18. Policy LP 28 specifically refers to 'Social and Community Infrastructure'. This term is reasonably defined in part within the supporting text of the policy and I agree with the Council that attempts to supply a precise and consequently potentially exclusive and inflexible definition would not be appropriate. The policy expresses the Council's commitment to ensuring the adequate provision of community services and facilities through the provision of new infrastructure to meet needs whilst resisting the unwarranted loss of such elsewhere. Such an approach is consistent with national policy and the thrust of the London Plan. The policy and its supporting text justifiably seek an inclusive approach for all sections of the community whilst sensibly seeking a multi-use approach for existing and proposed buildings. The policy also

recognises the potential effects of major housing developments on social and community infrastructure and the potential need to mitigate impacts which I am satisfied is appropriate and necessary.

19. I have noted the Statement of Common Ground between the Council and Sport England which recites the position with regard to indoor sports facilities and with which I do not dissent. I recommend a main modification to require that the effects of development upon such facilities are assessed appropriately which will ensure consistency with, albeit without the need to repeat, national policy (**MM14**).
20. Policy LP 29 addresses issues affecting 'Education and Training' and is evidenced adequately by a range of sources including the Council's School Place Planning Strategy which is an iterative document constantly subject to review. The totality of evidence, which includes clear partnership working, supports the thrust and content of LP 29 which I consider to be robust in its justification and ambition.
21. Part B of the Policy seeks to promote 'Local Employment Agreements'. The Council has subsequently clarified the justification for this element which offers clear positive opportunities for the local community and is in line with the objectives of the London Plan. I recommend a main modification to clarify the link between the policy and its means of implementation through legal agreements to ensure it is legally compliant and consistent with national policy (**MM15**).
22. The Council's approach towards 'Health and Well Being' is set out within Policy LP 30. Once again, the evidence base for the Plan as whole indicates a commitment to partnership working where appropriate and this is seen within the Joint Strategic Needs Assessment, the IDP and the work of the Clinical Commissioning Group. The Plan has benefitted from a Health Impact Assessment in addition to the robust Equalities Impact Assessment (EqIA).
23. Part A of the policy addresses positively the pattern of land use and facility provision and is both consistent with national policy and in general conformity with the London Plan. Part B seeks to retain and improve facilities for the community and the Council has suggested a number of changes which clarify the approach and the link between Policies LP 28 and 30 which I consider necessary main modifications to ensure their effective implementation (**MM16**).
24. Part B takes a restrictive approach towards new fast food takeaways. As presented, the policy is not strongly supported by the evidence base as to why such outlets should be restricted within 400 metres of schools. The evidential link between obesity in children and hot food takeaway locations is fragile. Not all A5 uses are necessarily unhealthy albeit Public Health England acknowledges that access to healthier food sources is a contributory factor to obesity. As worded the policy is neither positive nor adequately justified.
25. The London Plan encourages positive measures to promote healthy lifestyles and national policy promotes access to healthy food. As a consequence there is scope for Policy LP 30 to take a positive management approach towards the promotion of healthy food within a reasonable walking distance of schools which contain a key and logical part of the community. I recommend

accordingly (**MM16**) to enable a justified and effective policy position to be established consistent with national policy and in general conformity with the London Plan.

26. Open space, sport, recreation and play facilities are addressed by Policy LP 31. I am mindful of the submissions of Sport England, the subsequent Statement of Common Ground, the IDP and the various Council studies which include the Playing Pitch Assessment, the Playing Pitch Strategy, the Open Space Assessment and the Indoor Sports Facility Needs Assessment. The cumulative effect of the evidence base relied upon by the Council is sufficiently up-to-date and robust as to enable the Council to plan suitably and adequately for future provision over the plan period.
27. Policy LP 31 is worded flexibly to enable suitable site specific assessments to be undertaken where necessary and is consistent with national policy, including where the loss of facilities including playing fields is proposed. To ensure clarity, effectiveness and consistency with national policy I recommend changes to the policy wording (**MM17**) to be inclusive of new and existing playing fields and associated sports facilities.
28. Overall and subject to the modifications, the Plan is supported by a sufficiently robust evidence base and the approach towards 'Community Facilities', which includes allotments as referenced by justified Policy LP 32, is consistent with national policy and will be effective in operation.

Issue 3 – Is the Local Plan’s approach to housing provision sufficiently justified and consistent with national planning policy and in general conformity with the London Plan? With particular regard to deliverability, has the Plan been positively prepared and will it be effective in meeting the varied housing needs applicable to the Borough over the plan period?

29. The Council’s approach to the provision of housing is set out specifically within Policies LP 34 - 39. This is informed by a broad evidence base that includes the Council’s Housing Strategy which in turn has been produced with an awareness of the Revised London Housing Strategy, the Council’s Tenancy Strategy and associated research. I am mindful that the Council has undertaken its own Strategic Housing Market Assessment (SHMA).
30. The Council’s SHMA appears methodologically robust and has had regard to the Framework, the Planning Practice Guidance and existing London based evidence such as the Mayor’s Housing SPG. Within the wider London housing market area, Richmond has a housing market closely integrated with its neighbours in the south and west of the city and the inter-relationships between administrations is recognised within the SHMA. The SHMA has not unreasonably had regard to the GLA long term migration projections. It has also been mindful of the DCLG Household Projections (July 2016) and the ONS Subnational Population Projections (2014 base) in addition to noting the content of the 2013 London wide SHMA. I find its content to be cogent and adequate.
31. The Council’s SHMA has had suitable regard to available market signals which confirm that the Borough experiences relatively high housing costs and issues of affordability. Overall, I find the evidence has adequately and appropriately informed the Plan’s approach towards housing issues which is sufficiently

robust notwithstanding the acknowledged potential to utilise alternative methods in calculating levels of housing need. The Council identify a minimum unconstrained demographic based need for 1047 dwellings per year.

32. The London Plan currently sets a minimum target for the Borough of 3,150 homes (2015-2025) and this would be satisfied by the submitted Plan. As indicated within its Housing Annual Monitoring Report (AMR), the Council has a housing trajectory which indicates that it can fulfil its intended requirement. It also, particularly in terms of its 5 year housing land supply and previous performance, supports a 5% buffer provision which I find to be consistent with national policy.
33. Whilst meeting the London Plan target, the submitted Local Plan does not propose to meet its identified housing need, citing constraints in terms of available land and sites, particularly in light of the existing Metropolitan Open Land and Green Belt designations. Within this context, I am mindful that at present the housing market area of London informs the overall London housing need which is disaggregated across the Boroughs to ensure an adequacy of supply; the Council has worked with its neighbours and the GLA, who do not raise a conformity concern, in assessing its housing requirement and provision. The Council has sought to discharge its duty to cooperate through engagement with both London and non-London Boroughs albeit I note that the Richmond upon Thames needs are not being met by the latter.
34. I have noted concerns that the London-wide housing needs, in addition to those of the wider south-east of England, and the overall requirement contained in the London Plan may not be met. However a shortfall of the latter is not certain. I note that some nearby Boroughs are seeking to provide a greater level of housing than the London Plan identifies as a minimum and that the strategic issue of housing provision across the south-east is more properly a strategic matter for London as an administrative whole and other relevant Councils.
35. I am aware that a new London Plan is emerging which will revisit the issue of housing provision across the city and engage within the wider south-east of England on housing requirements. This is a key point and opportunity for the Council to address positively the content of any new London Plan and challenge itself to review the content of its own Plan to accommodate strategic changes. This may necessitate a reassessment of its currently identified constraints, for example a review of its designated GB and the urban capacity of its existing sites and centres.
36. In the interim, I am satisfied that the submitted Local Plan is based upon robust evidence, is justified by the evidence base, is consistent with national policy and is in general conformity with the London Plan as regards housing. Policy LP 34 establishes the minimum housing target and the broad areas within the Borough which will accommodate the growth. For the effectiveness of the Plan in the immediate term, I recommend the Council's proposed modification to the text of Policy LP 34. This clarifies that the indicative targets are not to be considered limits and that the overall housing target is to be exceeded in addition to clarification that a potential review of the Local Plan may be required following the adoption of any new London Plan (**MM3**).

37. Policy LP 36 sets out the Council's approach to affordable housing. It is not in dispute that the Borough has both a considerable level of need and significant issues of affordability. These issues are magnified by the constraints on land availability which exist within the Borough.
38. I am mindful of the government's Written Ministerial Statement (WMS) which seeks to tackle the potentially disproportionate burden of developer contributions on small scale developers. As iterated in the Draft Housing Background Paper on Policy Thresholds (LBR-LP-005) plus the SHMA and its associated research, there is a persuasive basis for requiring affordable housing (either through provision on site or via a financial contribution to the established Affordable Housing Fund) on all sites, including those below a capacity of ten or more units. The Council's viability evidence illustrates the relatively high land value within the Borough.
39. The Council has sought contributions towards affordable housing on small sites for some years and the cumulative nature of its evidence supports adequately the inclusion of this approach within the Plan. In so doing, the policy makes clear that the number of units should be considered as 'gross' rather than 'net' but in the context of the need this is justified. The policy allows for the consideration of development viability such that I am satisfied it is sufficiently flexible to be effective in implementation. Whilst I am mindful of the weight to be afforded to national policy, the evidenced local circumstances of the Borough exceptionally warrant the content of LP 36 in this regard.
40. The policy contains an ambitious expectation that 50% of all housing units will be affordable housing units; 40% should be housing for rent and 10% intermediate housing. Given the level of need and the direction of travel contained in the Mayor's draft Affordable Housing and Viability SPG I consider that ambition is acceptable and should not be lightly set aside.
41. The Council has updated its Whole Plan Viability Assessment which has considered the cumulative effect of plan policies and specifically LP 36. While there are variations in land values across the Borough, I consider a single approach towards viability is adequately justified and can be effective. It is clear that the 50% target is a challenging one in some of the scenarios tested and that the past experience of the Council is that the actual level of affordable housing secured from development sites is considerably below 50%. Nonetheless, the level of need and the issues of affordability do justify an ambitious approach. The viability evidence supports the potential for some sites to realise proportions approaching 50% and LP 36 does contain sufficient flexibility for site specific circumstances to be considered in agreeing any final figure.
42. The Plan references Starter Homes and self-build opportunities adequately within the context of the Borough. Overall, the policy is justified adequately. LP 36 and its supporting text require modification in line with the Council's suggestions to ensure clarity, effectiveness and an appropriate cross reference to the London context. I recommend accordingly (**MM3**).
43. Policy LP 37 addresses the housing needs of different groups, which are defined in part by the supporting text at Plan paragraph 9.4.2. Once again, the policy approach has been informed by evidence such as the SHMA, the

Council's existing Housing Strategy and the London Plan such that I am satisfied the Plan is adequately informed and robust. The Council relies upon its AMR to assess the effectiveness of the policy approach and I have no reason to consider that this is not capable of being effective.

44. With regard to gypsies, travellers and travelling showpeople and as illustrated by its Research on Gypsies and Travellers (SD27), the Council has sought to engage with neighbouring authorities in addition to relevant representative bodies, including the Richmond Housing Partnership (RHP), in assessing the level of need within the Borough. The Council concludes that there is no demonstrated need for any additional pitches within the Borough nor are there any signals that there is an unmet need for gypsy or traveller accommodation into the future. The RHP manages the single existing Borough site which is deemed to be adequate. The Council's research has found no needs arising for travelling showpeople within the Borough. On the basis of the available evidence which appears proportionate to the issue at hand, I have no reason to reach a different conclusion.
45. Policy LP 35 sets out the Council's requirements for its housing mix and applicable standards. This has had regard to the evidence base, including the SHMA. I am satisfied that part A of the policy contains a justified emphasis upon family sized accommodation whilst retaining sufficient flexibility for site considerations to be accounted for, thus ensuring the policy will be effective in implementation.
46. Parts B and E of the policy require compliance with the Nationally Described Space Standard and clarifies the application of Building Regulation Requirement M4 (2 and 3). These requirements have been considered for their effect upon development viability and their adequate justification is summarised within the supporting text of the plan which also allows some flexibility for circumstances where the requirements of the policy may be impractical. I find these parts of Policy LP 35 to be justified and effective.
47. Part D of Policy LP 35 seeks to ensure that the amenity space for new dwellings is adequate. The criteria listed are reasonable and there is sufficient flexibility in the phrasing of both the policy and its supporting text to enable suitable judgements to be reached on the acceptability of development proposals such that I am satisfied it would be effective in implementation.
48. In contrast, Part C of the policy introduces a prescriptive requirement for compliance with specific external space standards. Whilst I have had regard to the extant LDF Development Management Plan adopted prior to the Framework being published, I note that this does not contain the same specific policy requirements and cross references the guidance contained in the Council's Residential Standards SPD (2010). The Local Plan explains that the SPD will be updated and I consider that this will be an opportunity to ensure that the guidance, rather than overly prescriptive policy, is appropriate to the current Richmond upon Thames Borough context.
49. There is insufficient evidence and justification for Part C to require compliance with the Council's current external space standards as expressed within LP 35. Consequently, I recommend that this part of the policy is modified to reference the need to provide appropriate external space with a cross

reference to the intended updated guidance of the SPD. This will ensure flexibility in the application of the policy, enabling the site specific circumstances of development to be more reasonably considered and thus ensuring its effective implementation (**MM3**).

50. Policy LP 38 relates to the 'loss of housing' and in light of the overall evidence available is consistent with the objectives of the Plan and is both justified and capable of effective implementation.
51. Policy LP 39 sets out the Council's approach towards infill, backland and back garden development. The policy requires that infill and backland development should address 10 factors. I am satisfied that the factors are reasonable and should be considered cumulatively and proportionately to ensure appropriate forms of new development are delivered.
52. Part B of the Policy sets out a presumption against the loss of back gardens in order to maintain local character. Whilst this is not an unreasonable aim, the policy contains an unnecessary reference to 'exceptional cases' being permissible where no significant adverse effect occurs. Provided that such adverse effects are avoided there is no need for the reference to exceptional cases and therefore I recommend a modification to ensure clarity for its effective implementation (**MM3**).
53. The Local Plan's approach to housing provision is sufficiently justified and consistent with national planning policy and in general conformity with the London Plan. Subject to the modifications, I find that it has had adequate regard to deliverability, has been positively prepared and will be effective in meeting the varied housing needs applicable to the Borough over the plan period.

Issue 4 - Does the Plan take a justified and suitably evidenced based approach towards design, 'Green Infrastructure' and climate change? Is the Plan consistent with national policy in such regards and will it be effective in implementation?

Design

54. The Council has a proportionately detailed understanding of the design qualities of its Borough, particularly as evidenced by its Village Plan SPDs. Policy LP 1 (A) sets out the Council's aspirations and criteria for assessing design quality which are justified by the submitted evidence base and deliverable. Policy LP 1 (B) relates to shop fronts and whilst somewhat prescriptive does contain sufficient flexibility to be effective in practice. LP1 (C) relates to advertisements and hoardings and I have no reason to consider it is not justified as far as it relates to the Richmond context.
55. The Borough Wide Sustainable Urban Development Study (SD 41) is relied upon by the Council for informing the content of Policy LP 2 'Building Heights'. Criteria 1-4 provide adequate clarity on what factors the Council will take into account when determining new development proposals. Criterion 5 is intended to provide guidance that there are alternative and more appropriate ways to create local landmarks other than using height and creating tall buildings; whilst this is correct, the wording of the policy is potentially limiting

and I recommend a modification to address this matter in the interests of flexibility and effective delivery (**MM4**).

56. Criterion 6 addresses tall and taller buildings and is supported by the reasoned justification to the policy. Whilst paragraph 4.2.3 defines 'tall' and 'taller' buildings, there is potential ambiguity as to how this would apply to LP 2 (6) which states that the Council will 'resist buildings that are taller than the surrounding townscape'. It cannot be the Council's reasonable intention to allow no structure to be built higher than existing buildings in the townscape which would be inflexible and would not represent positive planning; this is one interpretation of the submitted policy. The construction of the policy and its text suggest that the Council wishes to manage the erection of 'taller' buildings (as defined in para 4.2.3) whilst proposals for 'tall' buildings would be potentially clustered close to the rail stations of Twickenham and Richmond. This stance is supported by the evidence base and to achieve this objective I recommend a modification to the policy in the interests of effectiveness (**MM4**). Buildings which may not fall within the definition of 'taller' would nonetheless be subject to the considerations of criteria 1 to 5 which will provide the Council with adequate means to manage design quality and the appropriateness or otherwise of development proposals.
57. Policies LP 3, 4 and 7 relate to Heritage Assets of which the Borough has a rich variety. Following discussion with Historic England, the Council has proposed changes to the wording of its policies to ensure consistency with national policy and effectiveness. I recommend the changes as a main modification accordingly (**MM2**).
58. Policy LP 5 seeks to protect the quality of views and vistas from within and through the Borough. The policy is informed by the London View Management Framework and is in general conformity with the London Plan. It is justified and, as secured by the additional changes to clarify the wording as proposed by the Council, will be effective in operation (**MM2**).
59. Policy LP 8 relates to 'amenity and living conditions'. The objectives of the policy are justified and I appreciate that it is informed by the existing guidance of the Council's range of SPDs, such as those relating to extensions and residential standards. The criteria listed are, on the whole, flexibly worded and proportionate to the objectives of securing appropriate living conditions for residents into the future. However, there is insufficient justification for stipulating that a minimum separation distance of 20m between main facing windows of habitable rooms as included within criteria 2; to do so would be prescriptive, unjustified and inflexible for effective operation. This advice exists within the SPD although I note that this pre-existing reference is more flexibly worded. I therefore recommend a main modification to delete this criterion and to clarify that the Council's SPDs are guidance rather than a set of expected 'rules' in all scenarios (**MM5**). This will ensure a flexible, justified and effective policy.
60. Policy LP 10 seeks to address issues of local environmental impact, pollution and land contamination. I agree with the Council's assessment that such a policy is required. The policy addresses a number of specific matters and I have noted the recent Air Quality Plan update produced by the Council which reiterates that Richmond is a Borough which is an Air Quality Management

Area and which clarifies the levels of air pollution in certain locations. The policy is justified in principle and contains justified criteria to manage the potential effects of new development albeit a modification is required, for reasons of effectiveness, to clarify that 'emissions neutral' development should be the policy objective **(MM6)**.

61. The policy has been considered, albeit in a set of general assumptions, for its effects upon development viability which I find adequate. The Council refers to a charge for the monitoring of any Construction Management Statement. This may only be acceptable in justified circumstances and therefore a modification is required to avoid the blanket application of an unwarranted charging regime **(MM6)**.
62. Basement and subterranean developments are addressed by Policy LP 11 which the Council evidences adequately as a matter that necessitates inclusion within the Plan. Mindful of the impending Article IV directions on this issue within the Borough, I agree. The policy detail is derived from shared experience across London and the Environment Agency is content with the policy wording itself, cross referencing Policy LP 21 as appropriate. I have no reason to consider otherwise and find that the policy is justified and is capable of being effective in implementation.

Green Infrastructure

63. In support of Policy LP 12 (Green Infrastructure) the Council's evidence includes its Open Space Assessment and the IDP. The principle underpinning LP 12 is consistent with national policy and the London Plan whilst the hierarchy of public open space is similarly clearly defined. Whilst there is a degree of ambiguity in the use of potentially synonymous phrases such as 'green spaces', 'green assets' and 'green infrastructure network', the thrust of the policy is clear, seeking to protect and enhance the wider green infrastructure network. I am satisfied, mindful of the Council's useful minor clarification of terminology, that Policy LP 12 is justified and consistent with national policy.
64. Policy LP 13 addresses matters affecting Green Belt (GB), Metropolitan Open Land (MoL) and Local Green Space (LGS) and is similarly based on evidence which includes the documents cited above, the Council's extant development plan, the London Plan and national policy. The Council is clear that it did not consider it appropriate for this submitted Plan, as a review of its extant documents, to undertake a GB/MoL review. Whilst, on balance, this is a justified position to take at this moment in time, I consider that it may be necessary to review the GB/MoL boundaries during the life of the plan to take account of requirements of the intended replacement London Plan which, by current estimates, may require further assessments of how best to accommodate the growth and development needs of London and the Borough itself.
65. Part A of Policy LP 13 provides a clear statement of intent that is consistent with national policy. The second part refers to 'appropriate uses' which is not a term found within national policy but which of itself does not contradict the thrust of the latter which seeks to manage directly the construction of new buildings. In this regard, it seems that new buildings which are inappropriate

by definition would be dealt with against the content of criterion A and national policy.

66. However, Part B of the policy provides three further criteria which would be applied as necessary to proposals seeking new small scale structures. These criteria are not consistent with national policy which simply identifies (NPPF para 87, 89 et al) that inappropriate development should not be approved except in very special circumstances and that new buildings should be regarded as inappropriate except where specifically provided for (eg facilities for outdoor sport etc). I therefore cannot find the content of criteria B justified or consistent with national policy; it is insufficiently clear why this part of the policy is necessary. The supporting text of LP 13 endeavours to recognise that there may be exceptional circumstances where inappropriate development could be acceptable, for example water plants and associated facilities, yet such development would fall to be reasonably considered under Part A of the policy in any event. The imposition of further criteria is unnecessary. I therefore recommend that Part B of the policy is modified to ensure effective implementation in line with national policy (**MM7**).
67. Part C of the policy identifies that the Council will take into account the possible visual impacts of development outside of the GB/MoL on its character and openness. I am mindful of national policy as it applies to GB areas and, on balance and whilst recognising that this is a matter of both planning judgement and legal interpretation in its potential implementation, I do not find the policy unsound through its phrasing.
68. Part D of the policy provides protection to identified LGS. National policy makes provision for the development plan process to designate LGS where three criteria are satisfied albeit also states that the designation will not be appropriate for most green areas or open space. The Council has, at para 5.2.10, created a number of additional criteria to be considered for the designation of LGS. The rationale for these is not clearly explained in the pre-submission evidence. Critically however and as accepted by the Council during the Examination Hearings process, there is no clear methodology which explains how the criteria have been applied and what means of value analysis has been applied to the sites identified to be designated as LGS. Thus the justification for any decision to designate land is more one of assertive opinion rather than evidential analysis and consequently is insufficiently robust. In the absence of such analytical process the inclusion of land as LGS cannot be supported at this time. Nonetheless, the LGS references within the Plan can be retained subject to modification to ensure clarity and consistency with national policy (**MM 7**).
69. I have noted the volume of representation received in relation to the Udney Park Playing Fields. It is clear that a large section of the community supports the designation of the land as LGS, albeit this is not universal and I note the submissions to the contrary. Regardless of the particular development aspirations that may apply to the site, my focus is upon whether designation of the land as LGS can be justified. In light of the absence of robust analysis as to its value against the criteria of the Framework and how any judgements have been objectively assessed in relation to, for example, its beauty, historic significance, recreational value etc, the designation is not justified adequately. The land is close to the community but it is unclear how it 'serves' that

community and submissions have been received which argue that the land is both special or, in the contrary, not special and the rationale for both is not well developed beyond assertion. I am unable to conclude that the designation is justified at this time. The site will retain its existing designation as Other Open Land of Townscape Importance (OOLTI). As a simple point of fact, the absence of a LGS designation of itself does not mean the site is, or is not, suitable for development.

70. As iterated above, I accept that the Council can rely on the established GB/MoL designations and I note that the London Plan generally resists the release of designated land. In the absence of a wider GB/MoL review there is no compelling reason to assess the perceived anomalies in the designated boundaries at this time, for example as affecting the Old Deer Park or the location of St Paul's School. The Plan is not unsound as a consequence. Similarly, I note the concerns expressed at the location of the MoL boundary at Belmont Road and a request to release designated land. However, and as justified by the Council in its Hearing submissions, at this moment in time the reliance on established boundaries, remains sound.
71. Thames Water considers that its Hampton Water Treatment Works should retain its previous status as a Major Developed Site. However, such terminology is no longer part of national policy and is not part of the Plan. I consider that the submitted Plan in conjunction with the application of national policy will enable due consideration to be given to development proposals on any site and their justification.
72. Submissions were made to the Examination that land historically used as settlement beds in Station Road, Hampton has erroneously been shown as being within the GB on the Policies Map (and its predecessor). There appears to be a relatively complex background to this matter. However, as noted above, the GB is not being reviewed at this time. The established designations remain in force. It is for the Council to ensure that these designations are accurately depicted on its policies map and it must be noted that the policies map is not of itself under examination for soundness.
73. Consequently, it must remain for the Council to satisfy itself that the established GB boundary, which of itself is not affected by this Plan, is accurately identified on the policies map with due regard to the history of the site and its iterations within the plan production process. Should the Council identify that the previous depiction is inaccurate, it has the ability to correct it as a matter of fact. It has alternatively been suggested that the land in question should be released from the GB. As identified above, there is no justification or requirement to do so outwith a wider GB review and the Plan is not unsound as a consequence.
74. Policy LP 14 relates to OOLTI which is a pre-existing designation for land within its extant development plan. The policy recognises locally important open land and is justified adequately by the available evidence albeit the Council has necessarily confirmed that new OOLTI designations will only be made through the development plan process. Such modifications are necessary to ensure effectiveness and transparency of the policy application (**MM 8**).

75. Policy LP 15 relates to biodiversity and is supported adequately by the available evidence base and is consistent with national policy whilst being in conformity with the London Plan. I note that Natural England raise no objections to its content and have no reason to disagree.
76. The Council's approach towards trees, woodlands and landscape is provided by Policy LP 16. Given the context of the Borough with its relative abundance of natural assets the policy is justified and maintains flexibility in its intended application, for example by clarifying that only where practicable will replacement trees be required or a financial contribution be sought for off-site provision. The policy is justified and capable of effective implementation.
77. Policy LP 17 requires green and/or brown roofs to be incorporated within major schemes in the interests of maximising the sustainability of such developments following the lead of the London Plan and the draft London Environment Strategy. The effects upon development viability have been considered to an adequate degree in proportion to the average amount of major schemes forthcoming within the Borough. Overall the policy is justified and capable of implementation.
78. Following discussion with the Port of London Authority, the Council has suggested some changes to clarify the approach of Policy LP 18 which addresses the importance of the river environment. I consider that these are necessary to ensure their effectiveness (**MM9**). I am also satisfied that the policy is supported adequately by the evidence base, including that at the strategic London level, and is capable of being implemented reasonably.
79. Allied to Policy LP 18, LP 19 relates to moorings and other floating structures. This recognises that the River Thames is MoL and establishes the circumstances where new structures may be permitted in this sensitive context. I am satisfied that it is a policy adequately supported by the available evidence which can be effective in its delivery.

Climate Change and Sustainable Design

80. The issue of climate change is explicitly referenced in the Plan's Vision and the Plan has been prepared with an awareness of national policy and longer term considerations of environmental change. Policy LP 20 promotes development to be resilient to the effects of climate change and to ensure new development minimises impacts arising from overheating and energy consumption. The objectives of the Plan are supported by the content of the Council's Sustainable Construction Checklist SPD. I find the policy to be justified and consistent with national policy.
81. Issues of flood risk and drainage are addressed by Policy LP 21 which, in line with national policy, seeks to avoid or minimise flood risk with due regard to climate change. I am mindful of the Council's evidence base which includes its Strategic Flood Risk Assessment Level 1 Update and Flood Risk Sequential Test Report. I also note that the Environment Agency remains satisfied with the submitted Plan and its approach. I recommend a number of modifications to the Policy and its supporting text to ensure clarity, consistency with national policy and effectiveness in implementation (**MM10**) and conclude that the approach of LP 21 is justified and will be effective.

82. Policy LP 22 relates to matters of sustainable design and construction. The Council has had regard to the content of the London Plan and seeks to achieve high standards of design to mitigate climate change. The policy makes specific reference to its Sustainable Construction Checklist SPD, water consumption rates, BREEAM standards³, zero carbon aspirations for certain developments, the Energy Hierarchy, decentralised energy networks and retrofitting. I am satisfied that the Council has had adequate regard to the potential effects of the policy requirements upon development viability, both in terms of existing viability work undertaken for the London Plan and in work for the submitted Local Plan.
83. Subject to modifications to the Policy to clarify the status of the SPD and the application of a threshold for non-residential buildings which are necessary for reasons of effectiveness and legal compliance (MM11), I find the Council's approach to be justified, positively prepared, effective and consistent with national policy.
84. The Council has developed Policy LP 24 'Waste Management' in the context of the London Plan targets for waste and recycling and in the context of the West London Waste Plan which contains a suite of policies and a range of identified waste sites serving the Borough. An allowance for the effects of the policy has been made in the Whole Plan Viability Assessment which I consider adequate and I find the approach of the Plan in this regard to be consistent with national policy and in general conformity with the London Plan. The Council has suggested clarification to the policy and its supporting text which I consider necessary for reasons of legal compliance and to ensure effective implementation (MM12).
85. Arlington Waste Works is a site that has a relatively small geographic area but is identified as a waste management site in the WLWP. I note the Council's recognition, in changes to the submitted Plan (MM12), that 'the existing waste management sites as set out in Appendix 2 of the West London Waste Plan were identified at a snapshot in time. This list can be revised'. As such the continued identification of the Arlington Works site is justified albeit the Council retains the flexibility to assess its retention through its monitoring processes. The submitted Plan is sound in this regard.
86. Overall and subject to the MMs, the Plan does take a justified and suitably evidenced based approach towards design, 'Green Infrastructure' and climate change. It is consistent with national policy in such regards and will be effective in implementation.

Issue 5 - Does the local plan provide the most appropriate and robust strategy towards the economy and the Borough centres with due regard to cross border issues? Is the approach evidenced adequately and consistent with national policy and in general conformity with the London Plan? Will the approach be effective?

87. Policy LP 25 addresses the issue of development in established centres, the hierarchy of which is clearly identified and adequately justified by a broad evidence base that includes the extant development plan, the Council's Retail

³ Building Research Establishment Environmental Assessment Method

Study and research such as The Analysis of Town Centres. The policy provides a clear structure for the consideration of development proposals that may affect the vitality and viability of centres. The Retail Study justifies appropriately the 200sqm threshold for the application of the sequential test whilst the requirement for a Retail Impact Assessment is also suitably reasoned. In such regards I am satisfied the policy is consistent with national policy and, being conscious in its evidence base of the position of Richmond and its neighbours within London, in general conformity with the London Plan.

88. Given the objective of the policy, the focus upon main town centre uses and the requirement that the Local Plan should be considered as a whole, I do not consider that residential uses require specific reference within Policy LP 25. Such uses are not precluded by the submitted policy wording.
89. Policy LP 26 identifies both Key and Secondary shopping frontages which have been adequately informed by an assessment of retail needs, town centre health checks and monitoring data. As supported by the evidence base, Policy LP 26A seeks to resist the loss of retail floorspace and enhance its provision where appropriate. The policy is clear and justified such that it will be effective in its application. Any redevelopment proposal not aligned with the policy objective for retail frontages will remain capable of advancing site specific considerations to be weighed in the balance by the Council or any decision maker.
90. Part B of LP 26 relates to Secondary shopping frontages and enables non-retail uses to be considered in accordance with criteria. I consider the approach to be clear and justified in the interests of meeting the retail needs of the centres. Similarly, Policy LP 26C establishes an approach to resist the over-concentration of uses in an area that is sufficiently justified by the available evidence. The policy approach to essential goods, post offices and changes of use in non-designated frontages is capable of being effective in its implementation and is warranted by the Council's evidence and the Borough context.
91. I note that Policy LP 26F sets a marketing requirement for changes of use which are not supported by policy. This introduces a helpful flexibility to the implementation of the objectives of the Plan which is appropriate. The marketing period is relatively long, at two years, and the marketing approach is prescriptively detailed in Appendix 5. Such requirements are potentially helpful but should be capable of amendment where justified in order to be effective. I therefore recommend a main modification to avoid repetitive prescription and enable effective implementation (**MM 13**). Whilst otherwise justified by the evidence base, this modification also affects the content of Policy LP 27 A3 and B.
92. As regards Borough Centres, the Plan does provide the most appropriate and robust strategy that is capable of being effective and is supported by evidence that is consistent with national policy and in general conformity with the London Plan.
93. Section 10 of the Plan addresses Employment and the Local Economy. Policy LP 40 sets out the Council's ambition to support a diverse and strong local economy. This is to be secured by retaining land in employment use, directing

major new employment development towards Richmond and Twickenham, encouraging small, affordable and flexible workspace and within mixed use development proposals identifying the retention and enhancement of existing employment floorspace. The principles underpinning this approach are gleaned from the evidence base which includes the Council's Employment Sites and Premises Study (Stages 1 and 2), which I find to be robust, and the wider London context as described by the London Plan and supporting information from the GLA.

94. The Council's evidence identifies that there have been substantial losses of both office and industrial space over recent years whilst the Council considers that the demand for space and the buoyancy of the existing market is demonstrated by extremely low vacancy rates within its existing stock. I do not disagree and consider that the content of Policy LP 40 is robust albeit that the Council's suggested change to criterion 4 is necessary to ensure clarity and effectiveness through avoiding ambiguity of interpretation (**MM18**).
95. Policy LP 41 represents a multi-part approach towards office accommodation. The Borough has experienced a considerable rate of loss of B1a floorspace over the last few years, particularly through residential conversion. The vacancy rate of existing stock is below that normally considered reasonable to accommodate business 'churn'. As a consequence the Council considers its approach, to carry a presumption against the loss of office floorspace, to be warranted.
96. The Council has identified Key Office Areas (KOA) through its Stage 2 study and which in parts of the Borough are supplemented by Article IV Directions removing permitted development rights for the conversion of B1a space to residential use. I heard concerns expressed at how the KOAs have been identified, particularly where a mix of uses may exist.
97. Outside of KOAs, Policy LP 41 does contain a degree of flexibility to manage circumstances for a reduction in office space where compelling evidence exists. This incorporates a reasonable sequential approach to enable alternative employment uses etc before considering residential. On the facts of the evidence available, I am satisfied that this is a proportionate and justified approach which can be effective in operation.
98. Within KOAs, the policy states that the net loss of office floorspace will not be permitted. Whilst there is some variation in rental levels and yields in some areas, such as around Electroline House, the overall thrust of the evidence supports a robust approach towards retaining the employment uses within KOAs which is justified adequately by the available evidence. Whilst the aim to increase the net supply of office floorspace in mixed use redevelopment proposals is supported by the level of general need in the Borough, this should reasonably apply where the characteristics of the site and the development make it feasible rather than a predetermined requirement. For reasons of effectiveness I recommend accordingly (**MM19**).
99. Policy LP 42 addresses the issue of industrial land and business parks. The Council relies in part upon its Employment Sites and Premises Study and has made reference to the GLA London Industrial Land Demand study (2017). These indicate that the Borough has experienced losses of industrial land of a

higher rate than anticipated and that it retains a positive demand for industrial space into the future. I am mindful that the Borough is categorised as a 'restricted transfer' Borough by the GLA and that its rate of land release has been exceeding anticipated levels. The Council aims to carefully manage its industrial land and floorspace stock. As a consequence, Policy LP 42 seeks to protect and where possible enhance its existing industrial land which is a logical and justified response to the available evidence across the Borough.

100. Policy LP 42 carries a presumption against the loss of industrial land in all parts of the Borough. With regard to the available evidence, this is justified. Where industrial space is not located in the identified locally important industrial land and business parks, the Policy allows for its loss where robust and compelling evidence is provided and following the application of a sequential approach. This would enable the consideration of redevelopment proposals for office or alternative employment uses or mixed uses including employment or community activity. Once again this is adequately justified by the evidence. I appreciate that the Council's Development Management Plan makes reference to the potential loss of employment land in locations with *severe site restrictions* which is not explicitly reflected in Policy LP 42. However, I consider that criterion 1 of LP 42 allows for the submission of compelling evidence which clearly demonstrates the absence of demand for industrial based uses in such locations and therefore a modification to the submitted policy is not necessary to ensure flexibility and soundness.
101. The two year marketing period is lengthy but not unreasonable in the context of a Borough with high levels of occupancy and a minimal stock of land. I find that the detail contained within Appendix 5, whilst potentially prescriptive, is capable of appropriate and proportionate application such that it will provide an effective process to manage the provision of industrial space.
102. The Plan identifies a number of locally important industrial land and business parks within Appendix 6 supported by its Assessment of Light Industrial and Storage Stock and its Employment and Site Premises report. The principles of the Plan's approach are in conformity with the London Plan. In such areas the Plan seeks clearly to ensure the retention of its industrial land and floorspace. As a consequence, the loss of industrial floorspace will be resisted unless replacement floorspace is provided; development of new industrial floorspace and improvement and expansion of existing premises is encouraged; and proposals for non-industrial uses will be resisted where the introduction of such uses would have an adverse impact on the continued operation of the existing services. Such principles are justified adequately by the evidence base.
103. The Council is seeking to manage its industrial land and floorspace stock in the face of evidence which suggests that it is cumulatively in decline and not readily capable of being enhanced. Nevertheless, whilst the principles referenced above are not fundamentally disputed, concerns have been expressed and evidence submitted as to whether the identified sites are justified adequately by the Council's evidence base and whether the approach of Policy LP 42 is consequently justified with regard to their individual characteristics.

104. I have had regard to the submitted evidence and have noted the limitations, for example means of access and surrounding residential uses, which exist around some sites and which may affect their future use. Indeed, the Council accepts that some locations are 'far from ideal employment sites'. Given the overall context of the Borough and the diminished pool of sites with a high degree of occupancy in those that remain, I nevertheless accept that the Council is justified in its policy approach. The totality of evidence supports the identified locally important industrial land and business parks but only if a degree of flexibility is introduced into the otherwise rigid policy position to enable a responsive approach to effective future use based on an assessment of the site characteristics and the nature of any redevelopment proposed. I recommend accordingly to ensure an effective policy framework for effective implementation (**MM 20**).

105. I conclude, subject to modifications, that the Plan does provide the most appropriate and robust strategy towards the economy and the Borough centres with due regard to cross border issues. It is evidenced adequately and consistent with national policy and in general conformity with the London Plan such that it will be effective in its implementation.

Issue 6 - Does the Plan address adequately transport issues and the provision of necessary infrastructure to support the delivery of the strategic objectives and the vision?

106. The Plan's Strategic Vision identifies a need to support sustainable growth with a commensurate sustainable approach to transport, particularly through cycling, walking and high quality public transport. Policy LP 44 provides some detail to this aspiration and includes a commitment to working in partnership to achieve the vision. The Policy is informed by a broad range of evidence which includes the IDP, the wider London context including the draft Mayoral Transport Strategy and an awareness of various transport related schemes already in development.

107. I note that the Council has sought to work with Transport for London in the production of the final Plan and the content of the subsequent Statement of Common Ground. The Plan acknowledges adequately the relevance of development locations and the Public Transport Accessibility Level in addition to the cross cutting relevance of air quality within the Borough. Furthermore, the Plan identifies the breadth of transport modes available within Richmond, including the River Thames, such that I consider the approach of the Plan and Policy LP 44 to be both justified and consistent with national policy.

108. Parking standards and the servicing of development is addressed by Policy LP 45 and Appendix 3. The thrust of the policy is to require new development to accommodate vehicles in order to meet the needs of that development whilst minimising the impact of car based travel. Appendix 3 sets a Borough parking standard for different types of development which in many instances is the same as that contained in the London Plan.

109. I am mindful that national policy enables the setting of local parking standards for residential and non-residential development taking into account matters such as development accessibility, its type, mix and use, the context of public transport and local car ownership levels. The Council has commissioned

research⁴ into its parking standards which has included the consideration of different options and ultimately supports the submitted position. The Council considers that Appendix 3 sets appropriate maximum parking standards whilst providing flexibility on a justified basis. However, Transport for London considers that Policy LP 45 and Appendix 3 are not in general conformity with the London Plan as the intended flexibility for parking standards in PTAL areas 2 and 3 would not encourage shifts away from car use in line with the aims of the London Plan, particularly in the absence of clarity on the maximum parking standard applicable and the way in which minimum provision may be applied.

110. Having regard to the Council's evidence which provides a detailed assessment of the Borough and its parking issues, I consider that the submitted Plan contains a level of bespoke flexibility that is reasonably applicable to the Borough circumstances and that is justified with regard to national policy. The objectives of the Plan are clear and the flexibility will enable the Council to consider the site specific circumstances of individual development proposals against both the development plan and salient material considerations. Whilst the detail is partly at variance with the London Plan, the underlying objectives remain similar and I do not find that the content of Policy LP 45 and Appendix 3 are so divergent as to constitute the submitted Plan being out of general conformity with the London Plan when both are considered as a whole. I note that the Council has suggested clarifications to the text of the Plan which I recommend to ensure the effective implementation of Policy (MM21).

111. With regard to the provision of necessary infrastructure, the Council has maintained a constant review of its IDP in liaison with appropriate partners and it also highlights its CIL Regulation 123 list. I have no reason to doubt the iterative nature of the IDP and the ability of the Council to maintain its focus on areas of necessary infrastructure requirements. Consequently, I am satisfied that the Council's monitoring activity, its Reg 123 list and the IDP underpin its robust ability to ensure necessary infrastructure is provided to support the Borough population and its future development.

112. Overall the Plan, subject to modification, does address adequately transport issues and the provision of necessary infrastructure to support the delivery of the strategic objectives and the vision.

Issue 7 - Are the Plan's monitoring targets justified adequately and of a level of detail that is appropriate to a Local Plan? How will the effectiveness of the Plan be managed?

113. The Council has an established Local Plan Monitoring Framework with which to assess the effective implementation of the Plan and its policies. The Council publishes a series of documents which collectively constitute its Monitoring Report. Table 2A of the Monitoring Framework lists the policies of the Plan and identifies appropriate indicators, targets and data sources which will be used to capture relevant information to assess the efficacy of the Plan as a whole. Not all policies have specific indicators for practical reasons but I am satisfied that the Council, in conjunction with the work undertaken for the London Plan Annual Monitoring Report, has a commitment to ensuring that the

⁴ SD39

delivery of the Plan and its objectives is monitored and managed suitably and proportionately.

114. For reasons of effectiveness, I recommend modifications to section 13 'Implementation' of the Plan to clarify the potential need for a review of the Plan in light of possible changed circumstances, such as national policy or the new London Plan, to clarify the position regarding planning obligations and pooling restrictions, to clarify the marketing requirements contained in Appendix 5 and to clarify some glossary definitions (**MM22**). Overall, I find the level of detail contained in the Monitoring Framework and the Council's approach towards monitoring is appropriate.
115. A critical purpose of monitoring is to ensure that the effectiveness of the Plan is optimised. This is recognised by the Council who intends to use its Monitoring Framework as a means to identify signals for change, alongside reviews of its IDP and decisions on planning applications to assess the effectiveness of its policies. This 'plan, monitor, manage' approach is proportionate and justified such that I am satisfied that the effectiveness of the Plan can be managed appropriately.
116. The Council has consulted upon its changes to the Policies Map to ensure that there is a suitable spatial representation of the content of the Plan. The Council has considered the Green Belt and MoL designations and is not proposing additional changes to these boundaries. There is insufficient evidence to find that such an approach is not proportionate and justified.
117. The Plan's monitoring targets and arrangements are justified adequately and of a level of detail that is appropriate to a Local Plan; subject to modification referenced above I find that they will support adequately the effective management of the Plan.

Issue 8 - Are the Site Allocations justified by the evidence base and of sufficient detail so as to be effective in delivery?

118. In 2012 the Council commenced work on its programmed Site Allocations DPD. Following stages of preparatory work and public consultation the Council decided not to pursue this DPD and alternatively to include specific allocations within the emerging Local Plan. Consequently the evidence for the Local Plan has its roots in this earlier work. Such evidence includes the SA which included a proportionate assessment of potential alternatives to the final chosen options for site development. I am mindful of this work in addition to the sources of evidence referenced by both the Council and other interested parties.
119. Not all allocations are referenced within this report due to the adequacy of the evidence base and the absence of matters that required further examination.

SA 2 Platts Eyot, Hampton

120. The Council has agreed a clarification with Historic England on the way in which heritage assets at Platts Eyot are referenced. This clarity, whilst useful, is not necessary to secure soundness. In other regards the allocation is supported adequately by the evidence base, including in relation to flood risk.

SA 3 Hampton Traffic Unit, Hampton

121. The site at the Hampton Traffic Unit is identified for potential redevelopment for business (B1), employment generating and other commercial or social and community infrastructure uses. The text of the allocation identifies the possibility that a residential led scheme could be considered if other uses were appropriately discounted. Whilst the evidence base broadly identifies the need for the non-residential uses and supports the approach of the allocation, the Council has recently granted planning permission for a residential scheme upon the site.
122. The Council does not wish to remove the aspiration of policy in the event that the extant permission was not implemented albeit that a minor change has been proposed to the Local Plan to clarify the position. Given the flexibility that is contained within the allocation and its supporting text, I am satisfied that circumstances do not necessitate a change to the focus of the allocation itself which is justified and appropriate.

SA 7 Strathmore Centre, Teddington

123. The Strathmore Centre is Council owned and in social infrastructure use currently providing child care. The site allocation seeks to retain this function and/or provide affordable housing albeit the latter would arise in the event the former was not feasible. Users and residents have raised concerns at the potential loss of the use and the adequacy of outside play space in any redevelopment proposal. The Council has clarified that redevelopment would only be acceptable if appropriate outside space and parking related to child care was re-provided. I agree that this modification is required (**MM 23**) for the effective delivery of the site aspirations and find that the evidence base supports the site allocation when considered overall.

SA 8 St Mary's University, Strawberry Hill

124. St Mary's University is an established institution within the Borough. As identified within the evidence, there are a number of considerations which affect any future development including the presence of MoL, listed buildings and Buildings of Townscape Merit.
125. As presented, the allocation would enable the retention and upgrading of the University and its associated teaching, sport and student accommodation including potential adaptations, extensions and new build elements on site where appropriate. To facilitate this work a 'Masterplan' or site development brief is envisaged to be prepared with the Council which is intended to become SPD. The existing Strawberry Hill Village Planning guidance SPD will be a consideration on matters of design in any redevelopment scheme. As worded therefore, the allocation provides a flexible approach towards possible redevelopment and upgrading works over the life of the Local Plan.
126. I heard discussion as to the justified needs to provide additional floorspace and the extent of the stated demand for University places. The empirical evidence is limited in these regards but I am mindful that any development would invariably need to be viable and that the Council wishes to ensure the

institution remains a competitive higher education facility in the future; in such regards it has been mindful of the University's ambitions. Overall and on balance, I am satisfied that the approach of the site allocation is adequately justified.

127. As referenced within the Statement of Common Ground, the Mayor of London disagrees with the Council on the approach to be taken within the allocation wording towards potential development occurring within the MoL, favouring the need to clarify that necessary development will be within previously developed land. Nevertheless, the Council agrees with the Mayor that modifications to the supporting text will clarify that MoL will be protected and that proposals should improve the character and openness of the MoL itself. I recommend modifications to SA 8 to ensure clarity as to how the allocation may be implemented effectively which includes a justified cross reference to relevant national and development plan policies. Such modifications also address the views of Historic England as regards the heritage assets of the site which warrant a more focussed reference (**MM 23**). On this basis the site allocation is justified by the evidence base and of sufficient detail so as to be effective in delivery.

SA 11 Twickenham Stadium, Twickenham

128. Twickenham Stadium is recognised within its site allocation as having national importance and support is provided for the improvement of its grounds for sports uses whilst allowing for appropriate additional facilities. The rationale for the policy is clearly expressed by the Council although the site operators wish to increase the flexibility of the allocation to enable a more diverse range of activities to occur at the site.

129. The Council has agreed changes to the wording within SA 11 to reference the reconfiguration of the stadium stands and the potential for a mixed use scheme that may include residential development with affordable housing; this latter element being supported by the housing evidence base and the other policies of the submitted Plan. I consider these changes helpful but not essential modifications to secure the soundness of the allocation itself which does not preclude this outcome. Nonetheless, the allocation does not reference the growth of the stadium or the operation of non-sporting activities at the site.

130. Given the location of the site and its established use in conjunction with the degree of flexibility contained within the submitted allocation, I agree with the Council that SA 11 provides adequate clarity for Twickenham Stadium at this time and that the normal application of the development management process would be able to resolve appropriately alternative proposals that may come forward.

SA 14 Kneller Hall, Whitton

131. Kneller Hall is described as the 'home of military music' but has been declared surplus to requirements. The Council proposes to update the Plan to reflect this situation with an additional change to the supporting text.

132. The site allocation and its supporting text provides reasonable clarity on the issues affecting the site and indicates that a range of new land uses may be

appropriate for the location which will be guided by a 'masterplan/site development brief' to be produced in conjunction with the Council. This latter piece of work will be an appropriate opportunity to assess the capacity of the site and its ability to deliver the range of potential uses referred to within SA 14 and will also be a suitable time in which to assess whether any element, for example residential, should lead the redevelopment initiative. I consider that such an approach is robust and provides considerable flexibility for any redevelopment scheme which will be deliverable as a result.

133. The site allocation requires a main modification to ensure its effectiveness with regards to the role of the playing fields and the sensitivity of the heritage assets (**MM23**) and, subject to this, is justified by the evidence base and of sufficient detail so as to be effective in delivery.

SA 15 Ham Close, Ham

134. Ham Close is an area of existing housing which the Council identifies as representing an opportunity to secure a comprehensive and beneficial redevelopment. The Council intends to continue its work with the Richmond Housing Partnership to produce a suitable 'masterplan' that will guide the re-provision of residential and non-residential buildings upon the site and allow for new residential accommodation as appropriate. The allocation identifies the factors which will need to be considered in bringing forward such a scheme and I am satisfied that it is justified and capable of effective implementation.

SA 16 Cassel Hospital, Ham Common

135. Cassel Hospital is an operational site providing a national service for those with complex personality disorders. The site allocation identifies that if the hospital becomes surplus to requirements then social and community land uses would be the most appropriate whilst some residential development could be considered if it allowed for the protection and restoration of affected heritage assets.

136. The Council's evidence base, including specifically the IDP, identifies a need for a suitable provision of health care and educational support services. Whilst I appreciate that the site would require investment to accommodate potential new activities, that factor alone does not negate the justification for seeking social and community infrastructure uses. The allocation is sound in such regards. Indeed, the allocation does acknowledge the potential scope for some residential uses to support the protection and restoration of the listed buildings and, in the absence of viability evidence to the contrary, I am satisfied that this flexibility does enable the potential deliverability of the Council's aims. On this basis the site allocation is justified by the evidence base and of sufficient detail so as to be effective in delivery.

SA 17 St Michael's Convent, Ham Common

137. St Michael's Convent and The Cottage are located at Ham Common and were effectively vacant at the time of my visit. The site allocation identifies that social and community infrastructure uses are the most appropriate for this site albeit conversion or redevelopment for residential uses could be feasible if it allows for the protection and restoration of the listed buildings on the site. I

am mindful that applications are being determined by the Council that incorporate retirement units and meeting rooms.

138. As worded, the allocation contains a clear emphasis upon the provision of social and community uses. The Council considers that this is justified due to the needs of the Borough and the area as identified within the IDP. I do not disagree. The allocation contains a reasonable flexibility for residential uses to be provided where it would enable restoration of the listed buildings. This is justified and appropriate.
139. The land to the north of the existing buildings is designated within the Local Plan as OOLTI. The earlier part of my report assesses the Council's approach to LP 14 and the designation of OOLTI. Based upon the criteria applied by the Council, the trees and plants in the northernmost part of the rear gardens are visible from the public domain and surrounding properties and contribute positively to the local character. The rear gardens are of a relatively and locally significant size. Their presence is notable from outside of the site, for example when perceived from Martingales Close. It is also reasonable, with regard to the available ecological evidence, to consider that the gardens do contribute to the network of green infrastructure, particularly given the presence of Ham Common to the south and the green corridor between Richmond Park and the River Thames.
140. However, the perceived value of the gardens outside of the private boundaries of the site diminishes as proximity to the existing main site buildings increases. Based upon the evidence provided, including my site inspection, the value of the gardens when assessed against the OOLTI criteria lie to the north of the former lawned areas and therefore should not include areas which lie open where more immediately adjacent to the buildings themselves and which are demarcated by an established footpath. The boundary should reflect this. The former allotment areas to the north of Avenue Lodge and west of the former lawns are characterised by an absence of significant development and this would reasonably inform views into and out of the site, albeit above the boundaries, from neighbouring properties. As a consequence, the inclusion of this area as part of the wider OOLTI is justified.
141. The Council considers that the gardens should also be designated as an Other Site of Nature Importance (OSNI). Whilst this was originally identified without the benefit of a site inspection, the Council's evidence was updated following a 'walk over' visit by the Council's ecology advisor and I am mindful of the Council's further Addendum evidence⁵. In totality, this indicates a range of habitats, tree and wildlife species relevant to the site. I have also been provided with a detailed Ecological Assessment (Aug 16) and a subsequent 'Briefing Note – Rebuttal' which addresses the area excluding the orchard area and amenity planting in the northern half of the site (Rep-026-01). This latter evidence, when considered overall, represents a more comprehensive and robust assessment of the site characteristics, including an assessment of the previous lawn area and its relationship to the priority habitat of 'Lowland Dry Acid Grassland'.

⁵ PS-065

142. Particularly as set out in the 'Rebuttal', including the comparative analysis at Table 1, the balance of evidence does not demonstrate sufficiently and robustly that the lawn area is a priority habitat that supports its inclusion as an OSNI.
143. For the avoidance of doubt, the available evidence indicates that the ecological value of the allotment area to the west of the former lawns and north of Avenue Lodge is limited. Notwithstanding that this area has experienced less cultivation since 2016 and is currently part of the wider undeveloped area, there is insufficient evidence to justify including this area as part of the designated OSNI.
144. Elsewhere the wider garden area is clearly a well-established and largely undeveloped space. Whilst the data on the range of site species is somewhat limited, I note that the orchard area is listed as Priority Habitat – Traditional Orchards, that there are some clear records of protected species and that the Council's ecologist considers the site does have value as part of a wider ecological network with which, mindful of all evidence and my site inspection, I agree. Based on the totality of the available evidence, and with due regard to Table 1 of the Rebuttal, the Council's OSNI designation is currently justified as far as it relates to the northern half of the site. For reasons of justification the site allocation should be modified accordingly (**MM23**).
145. Overall and as modified, the site allocation is justified by the evidence base and of sufficient detail so as to be effective in delivery.

SA 19 Richmond Station, Richmond

146. Richmond Station is a Building of Townscape Merit and a key part of the local transport infrastructure. The site allocation seeks to bring forward an improved transport interchange and the inclusion of retail and employment floorspace as part of a comprehensive redevelopment. As such I am satisfied that the Local Plan recognises adequately the heritage designations which affect the site and that they will be key considerations for any redevelopment proposal.
147. The Council anticipates a relatively high provision of new floorspace for a mix of uses. Whilst I heard some uncertainty expressed at the feasibility of delivering such aspirations within the constraints of the site, there is no specific evidence which indicates that a suitable redevelopment scheme would not be capable of being brought forward. The Council's existing development brief dates from 2002 yet nevertheless provides some useful context for any future redevelopment, highlighting issues which include operational constraints and townscape analysis. The potential effect of retail development on the existing town centre will require assessment but in light of the needs identified within the Council's Retail Needs Assessment and mindful of the operation of the Local Plan policies as a whole, I have no reason to consider the approach unsustainable or unjustified.
148. Despite the absence of any specific capacity analysis, the aspirations for the site contained within SA 19 are supported adequately by the available evidence and I have no reason to consider, in the knowledge of ongoing discussions between the Council and those with site interests, that the site is not capable of being effectively delivered during the plan period.

SA 20 Friars Lane Car Park, Richmond

149. The car park is within the Council's ownership. Notwithstanding its age, the Friars Lane Car Park Planning Brief SPD of 2006 provides some context for its potential redevelopment during the course of the plan period. The combination of the SPD and the text of the allocation make clear reference to the constraints of the site and the need to ensure any redevelopment accounts for its context appropriately. This will enable any planning proposal that emerges to be considered with a degree of effective flexibility which will take account of issues such as site capacity and building heights. The allocation is justified by the evidence base and capable of effective delivery.

SA 22 Pools on the Park and surroundings, Old Deer Park, Richmond

150. The evidence base indicates that the facility at Pools on the Park is ageing with a consequent need for maintenance and upgrading. The evidence also supports the acknowledgement within the Local Plan that the pools complex is a designated heritage asset and is a valued community asset. Consequently, the site allocation provides a flexible approach to development and works that may affect the site, supporting the continued use of the site for sports uses whilst potentially enabling additional leisure, community and complementary uses as appropriate. Subject to a modification to ensure that the significance of the heritage assets is recognised adequately (**MM23**), I find that the allocation is justified and capable of effective implementation.

SA 23 Richmond Athletic Association Ground, Old Deer Park, Richmond

151. The Richmond Athletic Association Ground is recognised as an important asset to the community. The Council supports the principle of improvement and an upgrading of facilities to support sports uses. The site allocation indicates that additional associated leisure facilities and other complementary uses could be incorporated to meet identified needs. Whilst there are limited details as to what such items could be, this does not undermine the justification of the allocation and its supporting text which identifies adequately the presence and importance of both the use of the site as a sports ground, the existence of MoL and a range of heritage assets. The allocation is justified adequately by the available evidence albeit a modification is required for reasons of effectiveness to ensure that proposals are justified to their context (**MM23**).

SA 24 Stag Brewery, Mortlake - is the allocation justified by the evidence base with due regard to alternatives and in particular:

- *The accessibility of the site;*
- *The need for a secondary school;*
- *The capacity of the site for mixed use development including housing;*
- *The presence and use of the sports field;*
- *The presence of heritage assets;*
- *The deliverability of the redevelopment*

152. The Stag Brewery site is the largest allocated site within the Local Plan. I am mindful of the level of interest shown in its potential redevelopment for a range of uses, both at the Local Plan consultation stage and during the course of the Examination.
153. The Council has worked with the local community in the previous preparation of a Planning Brief for the site which it adopted as SPD in 2011 (PS-095). This included an analysis of the site and its context whilst identifying a range of key issues and principles for any redevelopment scheme which would deliver on the adopted vision for a new village heart and a high quality mix of uses. The Council's allocation in the Local Plan contains updates on this previous situation. I heard from the Council that the SPD will remain in force, subject to the updates reflected in the Local Plan concerning the playing fields and the provision of a school. I recommend the Council's suggested change in this regard which provides additional and necessary clarity to the Plan as a consequence (**MM 23**).
154. I am aware that separate to the Local Plan Examination process, parallel discussions are ongoing between the Council and the site owners to bring forward a planning application. For the avoidance of doubt, I am obliged to consider the soundness of the Local Plan and its policies and, in this instance, not the possible future detail of any forthcoming application.
155. In terms of accessibility, the site is bordered by the Thames to the north and has a railway line to the south. It is situated in an area with a relatively low level of public transport access. The transport issues affecting the site are various and include limitations within the existing road and rail network capacity. Based upon the available evidence, it is clear that the format and scale of any redevelopment will need to be informed by further detailed analysis of the transport infrastructure. This would need to include consideration of the highway and rail safety implications of servicing the site.
156. To this end, I have noted the outcome of the traffic survey conducted on behalf of the Community Association and the Mortlake Level Crossing Risk Assessment. Whilst I am mindful of this work, I am also alert to the history of the site both in its former use and aspirations emerging in previous planning documents. The available evidence supports the Council's allocation. In broad terms the development management process provides an opportunity for the application of the totality of the relevant development plan policies and the consideration of, for example, detailed transport assessments in conjunction with the input of parties such as Transport for London. Based on the evidence available to me, including the 2011 SPD, the previous use of the site and the recognition that the site should contribute to the needs of the community and the Borough, the accessibility issues affecting the site are not evidenced as being of an insurmountable magnitude that would demonstrate that the intentions of SA 24 are not robust or capable of effective delivery.
157. The Council has identified that the site should deliver a new 6 form entry secondary school and this has generated considerable public interest. Whilst previously the site was intended to deliver a primary school, the Council's evidence, including its School Places Strategy and its Hearing statement, explains why a secondary school is needed in the eastern part of the Borough and how the site is considered able to deliver such a provision. The evidence

explains why a lower alternative form entry would not be appropriate and does consider and explain why alternative sites for such a school, for example at Barn Elms Playing Fields and elsewhere, are not preferred. Whilst I have noted the range of alternatives put forward, I am satisfied that the Council has explained adequately why its submitted approach is to be preferred and I have no reason to draw a different conclusion.

158. The site is relatively extensive in its scale. As worded, the submitted allocation does not provide a specific indication of its capacity to deliver the mix of uses envisaged including, for example, the level of housing. Whilst this does not provide prescriptive clarity of how any redevelopment may come forward, the SPD provides some analysis of the site context which indicates the feasibility of a mixed use scheme. Evidently there have been some changes in the intentions for the site since 2011, for example in terms of the school and as may affect the playing fields, but there is no doubt to my mind that the allocated site remains capable of delivering the ambitions of the allocation. Once again, it will be for the Council to work with all interested stakeholders to ensure the balance of any redevelopment scheme and its mix of uses across the site is appropriate. I have no reason to consider the site is not capable of delivering its intentions.
159. The Local Plan allocation includes the phrase '*..the retention and/or re-provision and upgrading of the playing field*'. To clarify its position and in association with Sport England, the Council has suggested adding further text confirming that any such re-provision would be on site. It is clear that despite the private ownership of the existing fields, arrangements have enabled their use for general public benefit. The site allocation recognises the value of the playing field and the role of sport and leisure uses within the locality. I am satisfied that the wording of the allocation is supported by evidence in this regard albeit also recognise that the precise formulation of the retained/re-provided space will be a matter of detailed interest to those affected by future development proposals. There is no clear reason to consider that this cannot be managed adequately through the normal development management processes.
160. The Framework identifies that a LGS designation will not be appropriate for most green areas or open space. I am mindful of the Council's criteria for LGS and the evidence submitted (see earlier in this report), including that from interested residents and the Council. I conclude that there is insufficient robust evidence that suggests any part of the Stag brewery site should be designated as LGS at this moment in time. The extant areas of OOLTI as referenced in the SPD remain applicable.
161. The site allocation recognises the heritage assets of the site and its surrounds adequately, for example the Buildings of Townscape Merit, the Mortlake Conservation Area and archaeological interests. The 2011 SPD reinforces this position. I have noted the Statement of Common Ground with Historic England and am satisfied that these issues are appropriately reflected in the submitted Plan.
162. Whilst it is clear that the site has been a matter of local interest for several years, the brewing operations have ceased and further discussions with those with site interests are continuing. I have no reason to consider that the site is

not capable of delivery in line with the aspirations of the Council. The site offers considerable opportunities for contributing positively to the needs of the Borough and it will be incumbent upon the Council to continue its work with all interested parties to bring this site forward in an acceptable manner as envisaged by the Plan and as supported by the SPD. A number of modifications are necessary to the allocation to ensure that it is clear and thereby effective, in relation to the mix of uses, the playing field, air quality, transport, the existing SPD and heritage assets (**MM23**). Overall, the site allocation is justified by the evidence base.

SA26 Kew Biothane Plant, Kew

163. A proportion of the site is designated as MoL. While its previous main use for the processing of brewing effluent has ceased, the MoL designation does not of itself unduly limit redevelopment when a significant proportion of the site is not so designated. The Council has determined that housing is a potential suitable use with regard to alternatives and, mindful of the SA and all other evidence, I have no reason to disagree.

SA 28 Barnes Hospital, East Sheen

164. The Council is working in partnership with relevant stakeholders to deliver a form of redevelopment for this site which encompasses the range of needs identified justifiably within the policy itself. The Council has confirmed that instead of a two form primary school the site will now incorporate a school for those with special educational needs. Based on the Council's evidence, I consider that this is a modification necessary for clarity and effectiveness (**MM 23**).

165. I note that the site is constrained in terms of its physical boundaries and accessibility but given the needs within the Borough, the previous use and the intended form of redevelopment, I have no reason to conclude that the flexible wording within SA 28, with an emphasis on the provision of social and community infrastructure, is not justified adequately or capable of effective implementation.

166. The site allocation is justified by the evidence base and of sufficient detail so as to be effective in delivery.

Conclusion on Issue 8

167. Overall and subject to the MMs, the Site Allocations are justified by the evidence base and of sufficient detail so as to be effective in delivery.

Public Sector Equality Duty

168. I am mindful of the Council's Equalities Impact Assessment and the way in which the Council intends to proceed in relation to all matters including the provision of homes for all sectors of the community and their accessibility (eg Policies LP 28, 35, 38 et al). I have had due regard to the provisions of Equality Act 2010 in reaching my conclusions.

Assessment of Legal Compliance

169. My examination of the compliance of the Plan with the legal requirements is summarised below. I conclude that the Plan meets them all.
170. My examination of the legal compliance of the Plan is summarised below.
171. The Local Plan has been prepared in accordance with the Council's Local Development Scheme of January 2017.
172. Consultation on the Local Plan and the MMs was carried out in compliance with the Council's Statement of Community Involvement (SCI). The SCI was adopted in June 2006 and has been subject to updates via addenda in 2009 and 2015. Consultation on the Local Plan and the MMs has complied with its requirements.
173. Sustainability Appraisal has been carried out and is adequate.
174. The Habitats Regulations Assessment Report December 2016 sets out that the Plan may have a significant effect on the integrity of nearby European sites due to air pollution although this was uncertain. An Appropriate Assessment was undertaken which concluded that the integrity of such sites would not be adversely impacted. Natural England support this and I agree.
175. The Local Plan includes policies designed to secure that the development and use of land in the local planning authority's area contribute to the mitigation of, and adaptation to, climate change.
176. The Local Plan is in general conformity with the spatial development strategy, The London Plan.
177. The Local Plan complies with all relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

Overall Conclusion and Recommendation

178. The Council has requested that I recommend MMs to make the Plan sound and capable of adoption. I conclude that with the recommended main modifications set out in the Appendix the London Borough of Richmond Local Plan satisfies the requirements of Section 20(5) of the 2004 Act and meets the criteria for soundness in the National Planning Policy Framework.

Andrew Seaman

Inspector

This report is accompanied by an Appendix containing the Main Modifications.

Policy Section or heading	Page / Paragraph	Proposed Change
		in <u>neighbourhood plans</u> , such as in the emerging Ham and Petersham Neighbourhood Plan), maintain and enhance our open spaces as well as our heritage, achieve high levels of sustainability and ensure all communities have access to housing, employment opportunities, services and facilities.
Local Character and Design Quality	p.28 Policy LP1	Amend the last paragraph of part A. of the policy LP1 to read: "All proposals, including extensions, alterations and shop fronts, will be assessed against <u>the policies contained within a neighbourhood plan where applicable, and</u> the advice set out in the relevant Village Planning Guidance and other SPDs relating to character and design."
MM2 Heritage Matters		
Strategic Vision	p.12 paragraph: 2.2.1	Section 1 of the Local Plan Strategic Vision (Page 12, paragraph 2.2.1) to read as follows: <u>"Heritage assets including</u> listed buildings and Conservation Areas , <u>historic parks</u> , as well as Royal Botanic Gardens, Kew World Heritage Site ..."
Local Character and Design Quality	p.28 Policy LP 1	Change last sentence of LP 1 Part B as follows: "In sensitive areas, <u>such as Conservation Areas and relevant Character Areas as identified in the Village Planning Guidance SPDs</u> , rigid and gloss finish blinds will generally be unacceptable."
Designated Heritage Assets	p.33 Policy LP 3	Paragraph A. "The Council will require development to conserve and, where possible, take opportunities to make a positive contribution to, the historic environment of the borough. <u>Development proposals likely to adversely affect the significance of heritage assets will be assessed against the requirement to seek to avoid harm and the justification for the proposal.</u> The significance (including the settings) of the borough's designated heritage assets, encompassing Conservation Areas, Listed Buildings, Scheduled Monuments as well as the Registered Historic Parks and Gardens will be conserved and enhanced by the following means:"
Designated Heritage Assets	p.33 Policy LP 3	<i>Point 2.</i> "Consent for demolition of Grade II Listed Buildings will only be granted in exceptional circumstances and for Grade II* and Grade I Listed Buildings in wholly exceptional circumstances following a thorough assessment of their <u>the justification for the proposal and the significance of the asset.</u> "
Designated Heritage Assets	p.34 Policy LP 3	Insert 2 further points under Section A of Policy LP 3 <u>"8. Protect and enhance the borough's registered Historic Parks and Gardens by ensuring that proposals do not have an adverse effect on their significance,</u>

Policy Section or heading	Page / Paragraph	Proposed Change
		<p><u>including their setting and/or views to and from the registered landscape.</u> <u>9. Protect Scheduled Ancient Monuments, including their settings, by ensuring proposals do not have an adverse impact on their significance."</u></p>
Designated Heritage Assets	p.34 Policy LP 3	<p>Amend criterion agreed as part of Statement of Common Ground as follows and update previous change in row above (formerly referred to as PE/LP3/3): <u>"9. Protect Scheduled Ancient Monuments, including their settings, by ensuring proposals do not have an adverse impact on their significance."</u></p>
Designated Heritage Assets	p.33 Policy LP 3 Paragraph 4.3.9	<p>Minor amendments to Part A as follows:</p> <p>"3. Resist the change of use of <u>l</u>isted <u>B</u>uildings where <u>their significance would be harmed</u>this would materially harm their character and distinctiveness, particularly where the current use contributes to the character of the surrounding area and to its sense of place.</p> <p>Amend the first sentence of paragraph 4.3.9 of the supporting text as follows:</p> <p>4.3.9 Listed Buildings are best used for their original purpose and therefore the Council will resist the change of use of a <u>l</u>isted <u>B</u>uilding where this would materially harm its <u>significance in relation to heritage interest and</u> character and distinctiveness. ..."</p>
Non-Designated Heritage Assets	p.36 Policy LP 4	<p>Move the following policy text into the supporting text at a new paragraph after paragraph 4.4.3:</p> <p>"4.4.4 Applicants will be required to:</p> <ol style="list-style-type: none"> 1) retain the character of Buildings of Townscape Merit, war memorials and any other non-designated heritage assets; 2) submit a Heritage Statement to assess the potential harm to, or loss of, the significance of the non-designated heritage asset, including from both direct and indirect effects; 3) describe the significance of the non-designated heritage asset affected, including any contribution made by their setting; the extent of the relevant setting will be proportionate to the significance of the asset. Appropriate expertise should be used to assess a non-designated heritage asset; and 4) retain or restore the structures, features and materials of the asset, which contribute to its architectural integrity and historic interest. "

Policy Section or heading	Page / Paragraph	Proposed Change
Views and Vistas	p.37 Policy LP 5	In criterion 5., change as follows: "Seek improvements to views, vistas, gaps and the skyline, particularly where views or vistas have been obscured will be encouraged where appropriate." Amend criterion 6. c. of policy LP 5 as follows: <u>"are affected by development on sites within the setting of, or adjacent to, conservation areas and listed buildings."</u> "affect the setting of and from development on sites adjacent to Conservation Areas and Listed Buildings."
MM3 Housing		
New Housing	p.118 LP 34 Paragraph 9.1.4	Amend para as follows: This is reflected in the broad expected pattern of future housing land supply set out in the policy LP34.B <u>which sets out indicative ranges for the broad areas and are not to be regarded as any lower or upper limit, as the overall target is to be exceeded.</u>
	9.1.1	Add to para as follows: <u>The Council will, as necessary, undertake a full or partial review of the Local Plan in light of the content of any new adopted London Plan which will include an assessment of its identified constraints and opportunities affecting housing delivery.</u>
Housing Mix and Standards	p.119 LP 35 Paragraph 9.2.2	Amend the last sentence in Part A to read: ... The housing mix should be appropriate to the <u>site-specifics of the location.</u> Amend the last sentence in paragraph 9.2.2 to read: ... <u>To accord with LP35.A the appropriate mix should be considered on a site by site basis having regard to...</u>
Housing Mix and Standards	LP 35	Amend Part C: C. All new housing development, including conversions, are required to comply with the Council's- <u>should provide adequate</u> external space standards. For houses a minimum total private space of 70sqm for 3 or more beds and 40sqm for 2 beds should be provided. To provide adequate private amenity space for flats, a minimum of 5sqm of private outdoor space for 1-2 person dwellings should be provided and an extra 1sqm should be provided for each additional occupant. Purpose built, well designed and positioned balconies or terraces are encouraged where new residential units are on upper floors, if they comply with policy LP8 Amenity and Living Conditions. Regard should be had to the Council's Residential Development Standards SPD as appropriate.

Policy Section or heading	Page / Paragraph	Proposed Change
Affordable Housing	p.121 LP 36	Amend Part A.a to read: a) 50% of all housing units will be affordable housing, with this 50% will comprise a tenure mix of 40% <u>of the affordable</u> housing for rent and 10% <u>of the affordable</u> intermediate housing.
Affordable Housing	p.123 LP 36 Paragraph 9.3.2	Amend Part B to read: B. A contribution towards affordable housing will be expected on all housing sites. <u>The following requirements apply:</u> a) <u>on all former employment sites at least 50% on-site provision. Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved.</u> b) on <u>all other</u> sites capable of ten or more units gross and all former employment sites , at least 50% on-site provision. Where possible, a greater proportion than 50% affordable housing on individual sites should be achieved. c) bc. on sites below the threshold of 'capable of ten or more units gross', a financial contribution to the Affordable Housing Fund commensurate with the scale of development, in line with the sliding scales set out below and in the Affordable Housing SPD. Amend fourth sentence in paragraph 9.3.2 to read: <u>A flowchart to follow, setting out the policy requirements and t</u> The mechanism for assessing the contributions from individual sites, is set out in the Affordable Housing SPD
Affordable Housing	p.122 LP 36	Amend Part C to read: C. <u>In accordance with A and B, T</u> the Council will seek the maximum reasonable amount of affordable housing when negotiating on individual private residential and mixed-use schemes. Amend Part D to read: D. Where a reduction to an affordable housing contribution is sought <u>from the requirements in A and B</u> on economic viability grounds
Infill, Backland and Backgarden Development	p.129 LP 39	Amend Part A criteria (10) to read: 10. Result in no <u>unacceptable</u> adverse impact on neighbours in terms of visual impact, noise or light from vehicular access or car parking. Amend Part B third sentence to read: In exceptional <u>some</u> cases where it is considered that a limited scale of back garden development may be <u>considered</u> acceptable it should not have a significantly adverse impact upon if it complies with

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		the factors set out in <u>A</u> above. Development on back garden sites must be more intimate in scale and lower than frontage properties.
MM4 Building Heights		
Building Heights	p.31 Policy LP 2	Amend as follows: "The Council will require new buildings, <u>including extensions and redevelopment of existing buildings</u> , to respect and strengthen the setting of the borough's valued townscapes and landscapes, through appropriate building heights, by the following means..."
Building Heights	p.31 Policy LP 2	Amend criterion 1 as follows: 1. require buildings to make a positive contribution towards the local character, townscape and skyline, generally reflecting the prevailing building heights within the vicinity; <u>proposals that are taller than the surrounding townscape have to be of high architectural design quality and standards, deliver public realm benefits and have a wholly positive impact on the character and quality of the area;</u> Delete criterion 6: 5. refrain from using height to express and create local landmarks; <u>and</u> 6. resist buildings that are taller than the surrounding townscape other than in exceptional circumstances, such as where the development is of high architectural design quality and standards, delivers public realm benefits and has a wholly positive impact on the character and quality of the area; and 7.6. require full planning applications for any building that exceeds the prevailing building height within the wider context and setting.
MM5 Amenity		
Amenity and Living Conditions	P41. Policy LP 8	Delete the following text from policy: ensure there is a minimum distance of 20 metres between main facing windows of habitable rooms (this includes living rooms, bedrooms and kitchens with a floor area of 13sqm or more) to preserve the privacy of existing properties affected by the new development;
Amenity and Living	p.41 Policy LP 8	Replace " expected to comply with... " with " <u>expected to have regard to the guidance set out within the</u>

Policy Section or heading	Page / Paragraph	Proposed Change
Conditions		Council's..."
Amenity and Living Conditions	p.42 Paragraph 4.8.8	<p>Amend paragraph 4.8.8 to read:</p> <p>Whilst there will be some impact from any new development, the test is one of harm in relation to the impact on habitable rooms, which includes all separate living rooms and bedrooms, plus kitchens with a floor area of 13sqm or more. The minimum distance <u>guideline</u> of 20 metres between habitable rooms within residential development is for privacy reasons; a greater distance may be required for other reasons, or a lesser distance may be acceptable in some circumstances. <u>These numerical guidelines should be assessed on a case by case basis, since privacy is only one of many factors in site layout design; where the established pattern of development in the area (layout and height) may favour lesser distances.</u> The distance of 20 metres is generally accepted as the distance that will not result in unreasonable overlooking. Where principal windows face a wall that contains no windows or those that are occluded (e.g. bathrooms), separation distances can be reduced to 13.5 metres. <u>Where the impact of a building is on another within the same development site, measures can also be applied to minimise overlooking, such as splays, angles of buildings, obscure glazing etc. A Supporting Planning Statement should set out justification for a reduction in these distances.</u></p>
MM6 Environmental Matters		
Local Environmental Impacts, Pollution & Land Contamination	p. 44 Policy LP 10	<p>Delete 'where practicable' from LP 10, Part B, and insert 'secure at least':</p> <p>"Developers should commit to <u>secure at least</u> 'Emissions Neutral' development where practicable."</p>
Local Environmental Impacts, Pollution and Land Contamination	p.45 Paragraph 4.10.5	<p>Insert within paragraph 4.10.5 the following:</p> <p>"The whole of the borough has been declared as an Air Quality Management Area (AQMA) and as such any new development and its impact upon air quality must be considered very carefully. <u>Strict mitigation will be required for any developments proposed within or adjacent to 'Air Quality Focus Areas'. An 'Air Quality Focus Area' is a location that has been identified as having high levels of pollution (i.e. exceeding the EU annual mean limit value for nitrogen dioxide) and human exposure. Air Quality Focus Areas are designated by the Greater London Authority.</u> The</p>

Policy Section or heading	Page / Paragraph	Proposed Change
		Council will consider the impact of introducing new developments to areas already subject to poor air quality, and the impact on the new occupiers of that development, especially in sensitive uses such as schools."
Local Environmental Impacts, Pollution and Land Contamination	p.45 Policy LP 10	Amend last sentence of LP 10 as follows: <u>Where applicable and considered necessary, the Council will may seek a bespoke charge specific to the proposal to cover the cost of monitoring the CMS; a discount may be applied if the applicant/developer uses the Council's Building Control services.</u>
MM7 Green Infrastructure		
Green Infrastructure	p.52 paragraph 5.1.1	Add a cross reference to Chapter 4 after the 2 nd sentence of paragraph 5.1.1 as follows: <u>"The need to protect the historic significance of the borough's exceptional landscapes is set out in Chapter 4: Local Character and Design."</u>
Green Infrastructure	p.55 Policy LP 13	Omit the criteria of Part B of LP 13. B. It will be recognised that there may be exceptional cases where inappropriate development, such as small scale structures <u>for essential utility infrastructure</u> , may be acceptable, but only if it: 1. Does not harm the character and openness of the Green Belt or Metropolitan Open Land; and 2. Is linked to the functional use of the Green Belt or Metropolitan Open Land, or supports outdoor open space uses; or 3. Is for essential utility infrastructure and facilities for which it needs to be demonstrated that no alternative locations are available and that they do not have any adverse impacts on the character and openness of the Green Belt or Metropolitan Open Land. Amend supporting text as required at para 5.2.4
	P 56 Para 5.2.8 5.2.10	Amend para to read: 5.2.8 Local Green Space, <u>as to be</u> identified on the Proposals Map, is green or open space which has been demonstrated to have special qualities and hold particular significance and value to the local community which it serves. <u>New areas of Local Green Space can only be designated when a plan is being prepared or reviewed.</u> <u>Delete last three bullet points of para 5.2.10</u>

Policy Section or heading	Page / Paragraph	Proposed Change
MM 8 Open Space		
Other Open Land of Townscape Importance	p.57 Paragraph 5.3.1	Amend paragraph 5.3.1 as follows: "The purpose of this policy is to safeguard open land of local importance and ensure that it is not lost to other uses without good cause. Areas designated as Other Open Land of Townscape Importance (OOLTI) form an important part of the multi-functional network of Green Infrastructure and they can include public and private sports grounds, school playing fields, cemeteries, allotments, private gardens, areas of vegetation such as street verges and mature trees. <u>New areas for OOLTI designation can only be identified when a plan is being prepared or reviewed.</u> The <u>existing</u> designated areas are shown on the <u>Proposals Policies</u> Map."
Other Open Land of Townscape Importance	p.57 Paragraphs 5.3.3 and 5.3.5	Delete paragraphs 5.3.3 and 5.3.5 of the supporting text of the OOLTI policy as follows: 5.3.3 This policy can also apply to other open or natural areas that are not designated, but which are considered to be of local value, and therefore merit protection. 5.3.5 This policy can also apply to other open or natural areas that are not designated, but which are considered to be of local value, and therefore merit protection.
Other Open Land of Townscape Importance	p.57 Paragraph 5.3.4	Add to the last bullet point the following: Value for biodiversity and nature conservation <u>and meets one of the above criteria.</u>
MM9 River Corridors		
River Corridors	p.64 Policy LP 18	The following change is proposed to LP18: - Public Access C. c. to read as follows: "Provide new public access to the riverside and the foreshore where possible, <u>and maintain existing points of access to the foreshore subject to health and safety considerations.</u> There is an expectation that all major development proposals adjacent to the borough's rivers shall provide public access to the riverside and foreshore. "
River Corridors	p.64 Policy LP 18	The Council to consider adding a new criterion C.d. to read as follows: " <u>Provide riparian life-saving equipment where required and necessary.</u> "
MM10 Climate Change		
Flood Risk and Sustainable	p.73 Policy LP21	Section B Basements and subterranean developments, 2 nd row of table

Policy Section or heading	Page / Paragraph	Proposed Change
Drainage		<p>"In areas of Extreme, Significant and Moderate Breach Hazard (as set out in the Council's SFRA): New basements: restricted to Less Vulnerable / Water Compatible use only." add after – " 'More Vulnerable' uses will only be considered if a site-specific Flood Risk Assessment demonstrates that the risk to life can be managed. <u>Bedrooms at basement level will not be permitted.</u>" - add after "'Highly Vulnerable' <u>such as self-contained basements/bedrooms</u> uses will not be permitted."</p>
Flood Risk and Sustainable Drainage	P.73 Policy LP21	<p>Section B. Basements and subterranean developments, 2nd row of table, amend as follows: "In areas of Low or No breach Hazard (as set out in the Council's SFRA): New basements: if the Exception Test (<u>where applicable</u>) is passed, basements may be permitted for residential use where they are <u>not</u> self-contained or used for bedrooms.</p>
Flood Risk and Sustainable Drainage	p.73 Policy LP21	<p>Section B. Basements and subterranean developments , 3rd row of table concerning Flood Zone 2, amend as follows: New basements: if the Exception Test (<u>where applicable</u>) is passed, basements may be permitted for residential use where they are <u>not</u> self-contained or used for bedrooms.</p>
Flood Risk and Sustainable Drainage	p.75 Flood Risk Assessments paragraph: 6.2.8	<p>Add after paragraph 6.2.8: "<u>All new development needs to take account of the latest climate change allowances. This should be included as part of the Flood Risk Assessment process. This will help minimise vulnerability and provide resilience to flooding in the future.</u>"</p>
Flood Risk and Sustainable Drainage	p.72 Policy LP 21	<p>Amend second paragraph of LP 21 as follows: In <u>Flood Zones 2 and 3</u> areas at risk of flooding, all proposals on sites of 10 dwellings or more or 1000sqm of non-residential development or more, or on any other proposal where safe access/egress cannot be achieved, a Flood Emergency Plan must be submitted."</p>
MM11 Sustainable design and construction		
Sustainable design and construction	p.78 Policy LP22	<p>Replace "to comply with..." with "to complete..." in Policy LP 22 Part A. point 1 to read: "Development of 1 dwelling unit or more, or 100sqm or more of non-residential floor space (including extensions) will be required to comply with <u>to complete</u> the Sustainable</p>

Policy Section or heading	Page / Paragraph	Proposed Change
		Construction Checklist SPD. A completed Checklist has to be submitted as part of the planning application.
Sustainable design and construction	p.79 Policy LP22	Replace " to comply with... " with " <u>to complete and submit...</u> " in Policy LP 22 Part E. 2 nd sentence to read: "Householder extensions and other development proposals that do not meet the thresholds set out in this policy are encouraged to comply with <u>to complete and submit</u> the Sustainable Construction Checklist SPD as far as possible, and opportunities for micro-generation of renewable energy will be supported in line with other policies in this Plan."
Sustainable design and construction	p.79 Policy LP22	Amend Part B criterion 3 to read: 3. All major non-residential buildings <u>over 100sqm</u> should achieve a 35% reduction. From 2019 all major non-residential buildings should achieve zero carbon standards in line with London Plan policy.
MM12 Waste Management		
Waste management	p.85 Policy LP 24	Amend Policy LP24 point 1 as follows: "All developments, including conversions and changes of use are required to provide adequate refuse and recycling storage space and facilities, which allows for ease of collection and which residents and occupiers can easily access, in line with the <u>guidance and advice set out in</u> the Council's SPD on Refuse and Recycling Storage Requirements."
Waste management	p.86 Paragraph 6.5.3	Amend paragraph 6.5.3 to read: "This policy ensures that all development proposals provide adequate refuse and recycling storage space and facilities to serve new developments, in line with <u>the guidance and advice set out in</u> the Council's SPD on Refuse and Recycling Storage Requirements.
Waste management	p.86	Add new paragraph after paragraph 6.5.6 as follows: <u>The existing waste management sites as set out in Appendix 2 of the West London Waste Plan were identified at a snapshot in time. This list can be revised. New waste sites, permissions and licences may be granted by the Council or Environment Agency. The Council carries out regular monitoring of existing waste sites, the results of which, including maps of operational sites, are published as part of the Authority's Monitoring Report.</u>
MM13 Borough Centres		
Development in Centres	p.88 LP 25	Add comma to LP 25.A.3 to read: For retail developments, including extensions, of over 500sqm gross, the Council will require a Retail Impact Assessment. ...

Policy Section or heading	Page / Paragraph	Proposed Change
Retail	p.97 Policy LP 26 F	F. Where a proposal involves a change of use not supported by policy, the Council will require satisfactory evidence of full and proper marketing of the site for at least 2 years . The applicant will <u>be expected need</u> to undertake marketing in line with the requirements set out in Appendix 5.
	p.99 Policy LP 27 A.3	3. The Council will require satisfactory evidence of full and proper marketing for a minimum of 2 years where a proposal does not meet the above criteria. The applicant will <u>be expected need</u> to undertake marketing in line with the requirements set out in Appendix 5.
	Policy LP 27 B	B. The Council will resist the loss of public houses. Before accepting the loss of any public house the Council requires satisfactory evidence of full and proper marketing normally for at least 2 years for a full range of appropriate uses (see policy LP 28 Social Infrastructure). The applicant will <u>be expected need</u> to undertake marketing in line with the requirements set out in Appendix 5.
MM14 Community Facilities		
Social and Community Infrastructure	p. 104	Add a new paragraph after 8.1.8 to read: <u>The Council's Indoor Sports Facility Needs Assessment highlights the need for new facilities within the borough. Where possible and feasible, such provision should be provided on-site in line with the Council's Indoor Sports Facility Needs Assessment.</u> Add a new paragraph after 8.1.10 to read: <u>Proposals that could result in the loss of an existing indoor sport facility will also be assessed against the Council's Indoor Sports Facility Needs Assessment and the criteria as set out in the NPPF. Early engagement with Sport England is encouraged where a proposal affects an existing indoor sport facility.</u>
MM15 Education and Training		
Education and Training – Local Employment Agreements	p.107 LP 29 Paragraph 8.2.14	Add after first sentence: ... <u>Securing the skills to support residents into sustainable employment is a key priority for the Council to support the local economy, to raise the bar further for those with higher levels of skills than London averages and make sure some residents with lower skills are not missing out economically.</u> ...
Education and Training –	p.107 LP 29	Add to end of paragraph 8.2.15: ... <u>Such an agreement can make use of existing</u>

Policy Section or heading	Page / Paragraph	Proposed Change
Local Employment Agreements	Paragraph 8.2.15	<p><u>schemes, such as Way2Work, Construction Training Initiative, schemes run by Registered Providers and developers, provided these manage the development related job opportunities.</u></p> <p><u>The details of the LEA will be subject to negotiation, tailored to site specific circumstances and proportionate to the scale of development proposed, and require developers to use reasonable endeavours to incorporate in their relevant contracts. The contents are expected to cover:</u></p> <ul style="list-style-type: none"> • <u>Forecasting of job opportunities</u> • <u>Notification of job vacancies</u> • <u>Local labour target</u> • <u>Jobs brokerage and skills training</u> • <u>Apprenticeships and work experience</u> • <u>Use of local suppliers</u> • <u>Delivery of specific LEA targets.</u> <p><u>A developer can set out justification as to why it may not be possible to deliver any of the requirements highlighted. Further guidance to assist implementation will be provided in a forthcoming SPD.</u></p>
MM16 Health and Well Being		
Social and Community Infrastructure and Health and Wellbeing	<p>p.104 LP 28 Paragraph 8.1.10</p> <p>p.111 LP 30 Paragraph 8.3.17</p>	<p>Amend paragraph 8.1.10 point (1): ... Where the application relates to the loss of a health facility, <u>the requirements of LP 30 will also need to be addressed and written agreement from the Richmond Clinical Commissioning Group, NHS England or other relevant health body must be provided...</u></p> <p>Add to end of paragraph 8.3.17 to read: Applications for new or loss of health and social care facilities will be considered in line with the criteria of policy LP 28 in 8.1 'Social and Community Infrastructure' and <u>paragraph 8.1.10 sets out that written agreement of the relevant health body must be provided to assess the loss of any existing health facilities.</u></p>
Health and Wellbeing	p.108 Policy LP30	add new point 7. within main policy section A under point 6. to read as follows: " <u>7. Active Design which encourages wellbeing and greater physical movement as part of everyday routines.</u> "
Health and Wellbeing	p.108 Policy LP 30	<p>Amend LP 30 B. bullet point 2:</p> <p>The Council will <u>manage</u> refuse proposals for new fast food takeaways (A5 uses) located within 400 metres of the boundaries of a primary or secondary school in order to <u>promote the availability of healthy</u> restrict the availability of unhealthy foods.</p>

Policy Section or heading	Page / Paragraph	Proposed Change
MM17 Open Space and Recreation		
Public Open Space, Play Space, Sport and Recreation	p. 111 Policy LP31	Amend first sentence of Part B as follows: "B. The Council will require all major development proposals in the borough to meet the Public Open Space, and play space, <u>and playing fields and ancillary sport facilities</u> needs arising out of the development by requiring the following:"
Public Open Space, Play Space, Sport and Recreation	p. 111 Policy LP31	Add new criterion 3 of Part B as follows: <u>"3. Playing fields and sport facilities: Applicants should assess the need and feasibility for on-site provision of new playing fields and ancillary sport facilities in line with the borough's Playing Pitch Strategy."</u>
Public Open Space, Play Space, Sport and Recreation	p. 111 Policy LP31	Amend criterion 3 of Part B as follows: 3-4. <u>Where on-site provision of Public Open Space, or play space or new playing fields and ancillary facilities</u> is not feasible or practicable, the Council will expect existing surrounding facilities and spaces to be improved and made more accessible to the users and occupiers of the new development through, for example, improved walking and cycling links or enhancements of play space <u>or existing playing fields and associated sport facilities</u> . Financial contributions will be required to either fund off-site provision, or improvements and enhancements of existing facilities, including access arrangements, to mitigate the impacts of new development."
MM 18 Employment		
Employment and local economy	p.132 Policy LP 40	Rewording of criterion 4 to read as follows: 4. <u>In exceptional circumstances, Mixed use development proposals which come forward for specific employment sites</u> should retain, and where possible enhance, the level of existing employment floor space. The inclusion of residential use within mixed use schemes will not be appropriate where it would be incompatible with, or adversely impact on, the continued operation of other established employment uses within that site or on neighbouring sites.
MM 19 Offices		
Offices	p.133 Policy LP 41	Amend 2b of Part A to read as follows: 2b) Mixed use including other employment generating or community uses. Such sites should <u>and residential</u>

Policy Section or heading	Page / Paragraph	Proposed Change
		<u>which maximises</u> the amount of affordable housing provided as part of the mix;
Offices	p.133 Policy LP 41	C. In the designated Key Office Areas, as shown on the Proposals Policies Map, net loss of office floorspace will not be permitted. Any development proposals for new employment or mixed use floorspace <u>should</u> will be required to contribute to a net increase in office floorspace <u>where feasible</u> . Criteria 1 and 2 in A (above) do not apply to the Key Office Areas areas.
Offices	p.134 Policy LP 41	Amend criterion 5 of Part D to read as follows: 5. The Council will require the provision of affordable office space within all major developments with over 1000sqm of office space; this will be secured through Planning Obligations in line with the Planning Obligations SPD .
Offices	p.135 paragraph 10.2.6	Add a first sentence and amend the supporting text at paragraph 10.2.6 to read as follows: <u>"The types of office buildings most at risk from conversion have relatively small floorplates. In order to maximise the choice of resources and maintain a stock of cheaper accommodation lower cost office stock to provide cheaper accommodation to the borough's high percentage of Small and Medium Enterprises (SMEs), the Council seeks to discourage the unnecessary redevelopment of these premises. "</u>
Offices	p.136 paragraph 10.2.12	Amend from penultimate sentence of paragraph 10.2.12 onwards to read as follows: "... Affordable workspace is considered to have a rent and service charge of less than 80% of comparable <u>local</u> market rates. <u>It is acknowledged that market rates will vary according to a range of factors such as location within the borough, the quality and type of office stock.</u> Affordable office provision; including appropriate rental values; will be agreed and secured through Planning Obligations in line with the Council's Planning Obligations SPD. <u>A revised Planning Obligations SPD will contain guidance to assist in the implementation of policy requirements on affordable employment space, including guidance on design and financial arrangements.</u>
MM 20 Industrial Land		
Industrial Land and Business Parks	p.137 Policy LP 42	Amend Part A criterion 2b to read: 2b) Mixed use including other employment generating or community uses, <u>and residential providing it does not adversely impact on the other uses and maximises the amount of affordable housing delivered as part of the mix.</u>

Policy Section or heading	Page / Paragraph	Proposed Change
Industrial Land and Business Parks	p. 138 Policy LP 42 10.3.8	<p>Change wording in Part B criterion a to read:</p> <p>a) loss of industrial floorspace will be resisted unless <u>appropriate full, on-site</u> replacement floorspace is provided;</p> <p>Change wording in Part B criterion c to read:</p> <p>c) proposals for non-industrial uses will be resisted where the introduction of such uses would have an adverse impact on the continued operation of the existing services <u>impact unacceptably on industrial activities (which may include waste sites).</u></p> <p>Amend text to read:</p> <p>10.3.8 In the locally important industrial land and business parks loss of industrial space will be strongly resisted unless <u>appropriate full, on-site</u> replacement provision is provided. <u>Appropriateness will be determined with particular regard to site circumstances and the industrial/employment needs of the Borough; it should not be interpreted as a like for like replacement in the nature of the use or its scale.</u></p>
Industrial Land and Business Parks	p. 138 Policy LP 42	<p>Amend Part C to read:</p> <p>New Industrial space</p> <p>c. Development of appropriate scale industrial uses, and improvement and expansion of such premises, is encouraged. New industrial space should be flexible and adaptable for different types of uses <u>activities</u> and suitable to meet future needs, especially to provide for the requirements of local businesses.</p>
MM 21 Parking		
Parking Standards and Servicing	p. 147 Paragraph 11.2.3	<p>Modifications to paragraph 11.2.3:</p> <p>11.2.3 Developers may only provide fewer parking spaces, including car free schemes, if they can show <u>demonstrate as part of a Transport Statement or Transport Assessment with supporting survey information and technical assessment</u> that there would be no <u>unacceptable</u> adverse impact on <u>on-street parking availability</u>, amenity, street scene, road safety or emergency access in the <u>vicinity surrounding area, as a result of the generation of unacceptable overspill of on-street parking in the vicinity.</u> In general it is expected that in PTAL areas of <u>0-3</u> 1-4 the standards should be met, but in <u>In</u> PTAL areas of <u>5-4-6</u>, such as Richmond and Twickenham centres, parking provision at a level lower than the standard of a car</p>

Policy Section or heading	Page / Paragraph	Proposed Change
		<p>free development, supported for example by a car club, may be appropriate where this can be demonstrated as acceptable, taking account of local characteristics, availability of sustainable modes of travel and public transport provision, and availability of on-street parking spaces in exceptional circumstances.</p>
Parking Standards and Servicing	p. 147 Paragraph 11.2.2	<p>Amend last paragraph of 11.2.2 as follows: 11.2.2 This restriction would be secured by a Planning Obligation <u>excluding the address from the schedule of streets in the relevant road traffic order that created or creates the Controlled Parking Zone in which the property is situated, by restricting under section 106 of the Town and Country Planning Act 1990 the disposal of an interest in relevant properties unless a person disposing advises the person acquiring of the non-availability of residents or business on-street parking permits and/or through Section 16 of the Greater London Council (General Powers) Act 1974 (or any statute revoking or re-enacting that Act).</u></p>
MM 22 Monitoring and Appendices		
Implementation	p.199 13.5 Monitoring	<p>Add new paragraph following 13.5.6:</p> <p><u>It is recognised that over the lifetime of the Plan, external circumstances will change. Whilst the Plan is overall considered to be flexible, the NPPF allows for Local Plans to be reviewed in whole or in part to respond flexibly to changing circumstances. Therefore, external factors such as changes in national policy, a London Plan review or changes in local evidence and need may trigger a review of this Local Plan. The programme for the preparation of Development Plan Documents is set out within the Council's Local Development Scheme, which is regularly reviewed and updated.</u></p>
Implementation	p.197 Paragraph 13.3.5	<p>Amend paragraph 13.3.5:</p> <p>... It should be noted that Planning Obligation monies will not be secured for projects or items already on the Council's Regulation 123 List, <u>and will be subject to the pooling restrictions as set out in the CIL regulations.</u></p>
Appendix 5 – Marketing Requirements	p.220 paragraph 18.0.2	<p>Amend paragraph 18.0.2 in Appendix 5 to read: This appendix sets out the details that should be provided to enable officers to assess the acceptability or otherwise of the marketing undertaken. <u>The Council's assessment will consider the overall length, type and quality of the marketing to come to a view, and if the applicant/agent puts forward any</u></p>

Policy Section or heading	Page / Paragraph	Proposed Change
		<p><u>justification for any shortcomings in the marketing (e.g. the use of only one specialist website rather than a range of generic websites due to the nature of the existing employment use, or that a marketing board was not used because of advertisement controls) these will be considered, however the expectation is the below requirements should be fully addressed.</u></p>
Appendix 7 - Glossary		<p>Amend the existing OOLTI definition in the glossary as follows:</p> <p><u>“Other Open Land of Townscape Importance (OOLTI) Open areas, which are not extensive enough to be defined as Metropolitan Open Land, but act as pockets of greenery of local significance, contribute to the local character, and are valued by residents as open spaces in the built up area. These areas can include public and private sports grounds, some school playing fields, cemeteries, allotments, private gardens, areas of vegetation such as street verges and mature trees. OOLTI is a local policy and new designations are made by the Council as part of the plan-making process. This is different to ‘Local Green Space’ (see definition above), which national policy makes provision for.”</u></p> <p>Add new definition to glossary for ‘Local Green Space’ as follows: <u>“Local Green Space (LGS) Local communities can identify green or open space which is of special quality and holds particular significance and value to the local community which it serves, in line with paragraphs 76 to 78 of the National Planning Policy Framework (NPPF). Local Green Spaces can only be designated when a local plan or neighbourhood plan is prepared or reviewed. National policy on Green Belt applies to any designated Local Green Space.”</u></p>
MM 23 Site Allocations		
Site Allocations	p.161 SA 7 Strathmore Centre	<p>Include text in bullet point 5 with regard to the provision of outdoor space and parking to read as follows: <u>“Proposed redevelopment will only be acceptable if the current child-care provision is adequately re-provided in a different way, including the provision of appropriate outside space and parking related to the childcare services, or elsewhere in a convenient alternative location accessible to the current community it supports.”</u></p>
Site Allocations	p.162 SA 8 St. Mary’s	<p>At the beginning of the 2nd paragraph of Policy SA 8 add “and/or” to the 1st sentence:</p>

Policy Section or heading	Page / Paragraph	Proposed Change
	University, Strawberry Hill	"A Masterplan <u>and / or</u> site development brief, ..."
Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	Delete " very " from the 4 th bullet point: "It is acknowledged that this is a very constrained site, with the majority of the land not built on designated as Metropolitan Open Land."
Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	Delete the last sentence of bullet point 4 as follows: "There are also Listed Buildings, Buildings of Townscape Merit as well as sports playing fields."
Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	Insert at beginning of 5 th bullet point: " <u>There are also Listed Buildings, Buildings of Townscape Merit as well as sports playing fields.</u> "
Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	Amend bullet point 5 (in addition to change PE/SA8/4 above) to stress the significance of the heritage assets to read: "Any development proposal has <u>to take account of the highly significant heritage assets</u> and respect the special and unique location and setting of St Mary's University, <u>including the Grade I Listed Chapel</u> , the adjoining Grade I Listed Building (Strawberry Hill House) and the associated Historic Park and Garden (II*) as well as ..."
Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	Insert new bullet point within the supporting text (after the 5th bullet point) as follows: <u>"The existing playing fields and sports facilities should be retained and/or re-provided, and if necessary, replacement facilities will have to be provided on or off site."</u>
Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	Amend the 6 th bullet point: "The Council will work with the University on a Masterplan <u>and / or</u> site <u>development</u> brief (SPD) for the longer term upgrading of their sites, ..."
Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	Amend the 7 th bullet point: "Detailed guidance on design and local character for any redevelopment proposal will also be set out within the site brief (SPD) as well as in the relevant Village Planning Guidance SPD, <u>and where relevant within the Masterplan / site development brief.</u> "
Site Allocations	p.162 SA 8 St. Mary's University, Strawberry Hill	Amend the 1st paragraph of Policy SA 8 to read: Retention and upgrading of St Mary's University and its associated teaching, sport and student residential accommodation. Upgrade works to include

Policy Section or heading	Page / Paragraph	Proposed Change
		refurbishment, adaptation, <u>intensification</u> , extensions and new build elements on site where appropriate <u>justified fully with regard to national policy and the policies of the development plan.</u>
Site Allocations	P.170 SA 14 Kneller Hall	Amend bullet point 6 as follows: "It is expected that the existing playing field will be retained and where possible upgraded, <u>such as with ancillary facilities, including changing provided to support the use of the playing fields</u> , provided that any existing ecological benefits and the openness and character of the Metropolitan Open Land is retained and, where possible enhanced."
Site Allocations	P.170 SA 14 Kneller Hall	Amend the last sentence of bullet point 7 to read: "Any development should <u>be sensitive to the significance of the historic building and respond positively to the setting of the Listed Building.</u> "
Site Allocations	P.170 SA 14 Kneller Hall	Change to the first sentence of main policy text: "If the site is declared surplus to requirements, It has been announced that Kneller Hall will be released for disposal. Appropriate land uses include..."
Site Allocations	p. 176 SA 17 St Michael's Convent	Amend the OSNI area to that lying to the north of the lawn area and its delineating path that traverses the site east-west (<u>also excluding the allotment north of Avenue Lodge</u>). (Note – consequential map update required)
Site Allocations	p.182 SA 22 Pools on the Park	Add a third sentence to the end of Policy SA 22 thus: <u>"Any proposal would need to be fully justified having assessed the significance of the building and its setting, and having taken into account the wider heritage designations that apply to the site."</u>
Site Allocations	p.184 SA 23 Richmond Athletic Association Ground	Modify the 2 nd sentence of the policy so that Policy SA 23 reads: "The Council supports the continued use of this site for sports uses, including improvements and upgrading of existing facilities. Additional associated leisure facilities and other complementary uses could be incorporated provided they <u>have been fully justified as being necessary to support the continued sporting uses on the site, that they demonstrate meeting identified needs, do not detract from the main use of the site as a sports ground, and have been developed to take into account of the Metropolitan Open Land (MOL) and historic designations.</u> "
Site Allocations	p.186 SA 24 Stag Brewery	In 7 th bullet point change text to read: "Incorporating a mix of uses, including social infrastructure and community as well as leisure, sport and health uses, and attractive frontages would <u>should</u>

Policy Section or heading	Page / Paragraph	Proposed Change
		contribute to creating an inviting and vibrant new centre."
Site Allocations	p.186 SA 24 Stag Brewery	Proposed modification as new additional bullet point – new 10 th bullet point (after the one referring to Mortlake Conservation Area): <u>"The site is very close to an Air Quality Focus Area. Therefore strict mitigation measures will be required, both to mitigate any effect on current receptors and highways and on future receptors within the proposed development, particularly for sensitive receptors, such as pupils at the secondary school."</u>
Site Allocations	p.186 SA 24 Stag Brewery	Amend penultimate bullet point as follows: "There may be an opportunity to relocate the bus stopping / turning facility from Avondale Road Bus station to this site. The adopted development brief (2011) identifies a number of transportation and highways issues. The Council will expect the developer to work together with relevant partners, including Transport for London, to ensure that where possible necessary improvements to sustainable modes of travel, including public transport facilities, can be secured as part of any development proposal. The opportunity to relocate the bus stopping / turning facility from Avondale Road Bus station to this site should be investigated as part of the comprehensive redevelopment."
Site Allocations	p.186 SA 24 Stag Brewery	Amend first bullet point as follows: "The Council has produced and adopted a development brief in 2011 for this site, which sets out the vision for redevelopment and provides further guidance on the site's characteristics, constraints, land use and development opportunities. <u>Any proposed development should have due regard to the adopted brief."</u>
Site Allocations	p.186 SA 24 Stag Brewery	Insert after the original 10 th bullet point the following: <u>The playing fields in the south west corner of the site, which are designated Other Open Land of Townscape Importance (OOLTI), should be retained and/or reprovided and upgraded. In the event of reprovision and upgrading, where a comprehensive approach to redevelopment can be taken in line with policy LP 14, it may be acceptable to re-distribute designated OOLTI within the site, provided that the new open area is equivalent or improved in terms of quantum, quality and openness. In addition, reprovision and upgrading of the playing fields within the site for sport uses has</u>

Policy Section or heading	Page / Paragraph	Proposed Change
		to be carried out in line with policy LP 31, the NPPF and Sport England Policy.
Site Allocations	p.186 SA 24 Stag Brewery	Amend the original 9 th bullet point as follows: "The site is <u>within an Archaeological Priority Area and partially within the Mortlake Conservation Area...</u> "
Site Allocations	p.191 SA 28 Barnes Hospital	Modify the 2 nd sentence of policy SA 28 to read: "Any redevelopment proposal for this site will be required to prioritise the provision of a new <u>Special Education Needs 2-form entry primary school.</u> "
Site Allocations	p.191 SA28 Barnes Hospital	In 3 rd bullet point change text to read: "There is a clear need for a new <u>Special Education Needs 2-form entry primary school</u> in this area as set out in the <u>updated</u> Council's School Place Planning Strategy. Therefore, the Council expects any redevelopment proposal to prioritise the provision of the educational use."

Appendix 8

Local Plan Authority Monitoring Report - Housing - 2019/20

Planning

16 November 2020

Local Plan Authority Monitoring Report

Housing

Covering financial year 2019/2020

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Local Plan Authority Monitoring Report - Housing

Summary Position Statement, November 2020

Covering financial year 2019/20

Housing starts, completions and pipeline

The London Borough of Richmond upon Thames's housing target is set in the London Plan. The Further Alterations to the London Plan (FALP) confirmed in the published (i.e. adopted) consolidated London Plan (March 2015) a target of 3150 for 2015-2025, which is equivalent to 315 additional homes per year.

Net additional dwellings for the reporting year

A net gain of 331 residential units were completed in 2019/20.

Future Housing Supply and Implementation Strategy - Housing Trajectory as at 1st April 2020

Tables 1 and 2 in the accompanying summary tables spreadsheet show that past London Plan requirements have been significantly exceeded.

The results of the 2018 Housing Delivery Test for Richmond showed 1,332 homes delivery 2015/16 to 2017/18 against 945 homes required, a measurement of 141% and therefore no action required. The results of the 2019 Housing Delivery Test for Richmond showed 1,147 homes delivery 2016/17 to 2019/20 against 945 homes requirement, a measurement of 121% and therefore no action required.

The FALP housing target is rolled forward until it is replaced by a revised London Plan target. A full review of the London Plan has been underway. The Mayor considered the Inspectors' recommendations and, on 9 December 2019, issued to the Secretary of State his intention to publish the London Plan. The Secretary of State responded and issued Directions on 13 March 2020, and the Mayor responded to the Secretary of State on 24 April 2020. The current stage¹ is to informally agree text of new London Plan with MHCLG and Secretary of State, before it can be finalised. Although at an advanced stage, the final format of the Plan is not known, and parts of the housing policies are under discussion between the Mayor of London and the MHCLG. It is expected that the new London Plan will set a new 10 year housing target of 4,110 for net housing completions (2019/20 -2028/29), and a 10 year target (2019/20 -2028/29) for net housing completions on small sites (below 0.25 hectares in size) of 2,340 homes.

The National Planning Policy Framework (NPPF) requires Local Planning Authorities to identify annually and maintain a rolling 5-year housing land supply. Sites for inclusion should be specific and deliverable – the NPPF definition sets out sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years, with further guidance in national Planning Practice Guidance². Each site has been assessed for its deliverability, in discussions with officers in development management and using monitoring resources, for clear evidence that completions will begin within five years, to accord with NPPF and PPG guidance. Tables 3 and 4 in the accompanying spreadsheet show the Council has identified a potential 2,219 units over the 5-year period (2020/21 to 2024/25), which exceeds the target in the London Plan 2015 and the target in the emerging new London Plan. This includes the NPPF requirement of an additional buffer of 5%.

The new London Plan (as expected to be published 2020) includes Policy H2 Small Sites seeking to expand supply from this current underutilised source. London Plan Policy H2 sets out that boroughs should proactively support well-designed new homes on small sites, including through planning decisions, and should recognise in their development plans that local character evolves over time and will need to change in appropriate locations to accommodate additional housing on small sites. The detailed approach in the London Plan will, once finalised, have full weight in decision-making.

¹ <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/what-new-london-plan>

² <https://www.gov.uk/guidance/housing-supply-and-delivery>

Also taken into consideration:

Recovered appeal: land to the east of Newport Road and to the east and west of Cranfield Road, Woburn Sands (ref: 3169314 - 25 June 2020)

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/894813/Combined_DL_IR_R_to_C_Newport_Road_Woburn_Sands.pdf

East Northamptonshire Council v Secretary of State for Housing, Communities and Local Government

<https://cached.offlinehbpl.hbpl.co.uk/NewsAttachments/RLP/CO009192020.pdf>

At the time of writing, the longer-term implications arising from the Covid-19 pandemic remain uncertain, however nationally appeal decisions to date have recognised the 5-year supply is concerned only with the number of deliverable sites, and that figure is entirely separate from the number of houses actually built and occupied, and that effects may be short-term. Appeal Decisions APP/A1530/W/20/3248038

<https://acp.planninginspectorate.gov.uk/ViewDocument.aspx?fileid=38702825> and APP/K0235/W/19/3243154

<https://acp.planninginspectorate.gov.uk/ViewDocument.aspx?fileid=39035748>

The supporting text in the London Plan sets out that incremental intensification of existing residential areas within PTALs 3-6 or within 800m distance of a station or town centre boundary is expected to play an important role in contributing towards the housing targets for small sites. It states this can take a number of forms, such as: new build, infill development, residential conversions, redevelopment or extension of existing buildings, including non-residential buildings and residential garages, where this results in net additional housing provision. It is therefore justified to consider an increase in small sites delivery in the borough, compared to the average in recent years. Further detailed design guidance to aid policy implementation is being prepared by the GLA (see the consultation on the draft Good Quality Homes for all Londoners SPG³), which takes a design-led approach to make the most of the land available.

The new small sites target for the borough at Table 4.2 in the London Plan, equating to 234 homes per annum, sets a minimum baseline which the GLA expects to be exceeded, particularly in outer London, as paragraph 4.2.6 sets out it represents a small amount of the potential for intensification. The London Plan at paragraph 4.1.8 states that “The allowance for windfall sites (that are not specifically identified) is considered appropriate given the policy framework set out in the London Plan; the capital’s reliance on recycled brownfield sites in other active land uses; and the number of additional homes expected to be provided via incremental intensification of existing residential areas”. It recognises that because of the nature of some sites, including the particular incremental characteristics of small sites, boroughs are supported in using windfall assumptions in their five-year housing trajectories based on the numbers set out in Table 4.2. It is therefore considered appropriate to include a windfall of 234 homes per annum from years three to five in the five year housing land supply. Average net completions on small sites 2013/14 to 2019/20 have already been averaging 176 homes per annum.

In addition, higher windfall assumptions are considered justified due to the Government’s introduction of further Permitted Development Rights⁴ – making it easier to extend certain buildings upwards to increase housing density⁵ and the residential redevelopment of vacant and redundant buildings⁶. These were part of radical reforms to the planning system announced by the Government⁷ to give greater freedom to create new homes, to kickstart the construction industry and speed up housebuilding by removing unnecessary red tape.

Work on the new Richmond Local Plan has also commenced⁸, with a Direction of Travel consultation⁹ completed in Spring 2020 including a call for sites. 33 responses were received on the call for sites and will be considered in progressing the preparation of the new Local Plan, including site allocations, to positively plan for delivering housing and other future needs. The Council’s recent Affordable Housing Update to the Adult Social Services, Health and Housing Committee on 8 September 2020¹⁰ estimates 182 affordable homes completing 2021/22 to 2022/23 as forecasts currently stand, and notes estimates of delivery over the next ten years identify the potential to now deliver well over 1,000 affordable homes.

(Note: An interim housing supply statement was published on the Councils AMR webpage in September 2020. This full AMR includes minor updates/corrections to the figures cited for completions and future supply.)

³ <https://www.london.gov.uk/what-we-do/planning/implementing-london-plan/london-plan-guidance-and-spgs/good-quality-homes-all-londoners-consultation-draft>

⁴ Future monitoring to keep under review. At the time of writing, applications for upwards extensions have already been received by the Council.

⁵ <https://www.gov.uk/government/publications/permitted-development-rights-and-changes-to-the-use-classes-order/fast-tracked-approval-for-building-upwards-key-facts-brief>

⁶ <https://www.gov.uk/government/publications/permitted-development-rights-and-changes-to-the-use-classes-order/fast-track-planning-for-brownfield-regeneration-key-facts-brief>

⁷ <https://www.gov.uk/government/news/pm-build-build-build>

⁸ In accordance with the Local Development Scheme adopted July 2019

https://www.richmond.gov.uk/services/planning/planning_policy/local_plan/local_development_scheme

⁹ https://www.richmond.gov.uk/services/planning/planning_policy/local_plan/new_local_plan_direction_of_travel_engagement

¹⁰ <https://cabnet.richmond.gov.uk/documents/s86420/LBR%20Affordable%20Housing%20Update%20Report%20208-9-20.pdf>

<https://cabnet.richmond.gov.uk/ieListDocuments.aspx?CId=798&MId=4917>

Introduction

This Monitoring Report is one of several publications which assess the effectiveness of planning policies in the borough. Such reports will be published in a phased approach on the Council's website¹¹

Data sources

The data used in this report comes from the Council's decisions analysis monitoring system which has recorded data on permitted applications since the 1980s. Data is up to 1st April 2020, but where relevant includes updates as footnotes since that time. An accompanying spreadsheet is available on the Council's website, and as an appendix to this report, with the full data and analysis summarised in this report.

This report monitors:

- Net additional dwellings for the reporting year
- Net additional dwellings over previous years
- Net additional dwellings – in future years
- Net additional gypsy and traveller pitches per annum
- Percentage of new housing development on back garden land as a proportion of all housing completions
- Completions by dwelling size
- Percentage of all new housing completions which is affordable housing
- Affordable housing – in future years

The headline findings in terms of the effectiveness of key housing are:

Housing supply – the rate of completions (331 units net) in 2019/20 exceeded the annual target in the London Plan 2015 of 315 homes per annum, with completions on 6 large sites. For future housing land supply there is an identified **2,219** units over the 5-year period, which is **1,152** units more than the remaining target in the London Plan 2015.

Affordable housing – 10% of units (34 units net) were delivered as affordable, from two large sites, which is considerably below the strategic borough-wide target.

Housing starts, completions and pipeline

The London Borough of Richmond upon Thames's housing target is set in the London Plan. The Further Alterations to the London Plan (FALP) confirmed in the published (i.e. adopted) consolidated London Plan (March 2015) a target of 3150 for 2015-2025, which is equivalent to 315 additional homes per year.

Table 1: Plan period and housing targets

Start of plan period	End of plan period	Total Housing requirement	Source
2007/08	2016/17	2,700 (270 per year)	The London Plan, Consolidated with Alterations since 2004 (February 2008)
2011	2021	2,450 (245 per year)	London Plan 2011 (including Revised Early Minor Alterations October 2013)
2015	2025	3,150 (315 per year)	London Plan 2015 (consolidated with Alterations since 2011)

As set out in the Summary Position Statement above, the FALP housing target is rolled forward until it is replaced by a revised London Plan target. It is expected that the new London Plan will set a new 10-year housing target of 4,110 for net housing completions (2019/20 -2028/29).

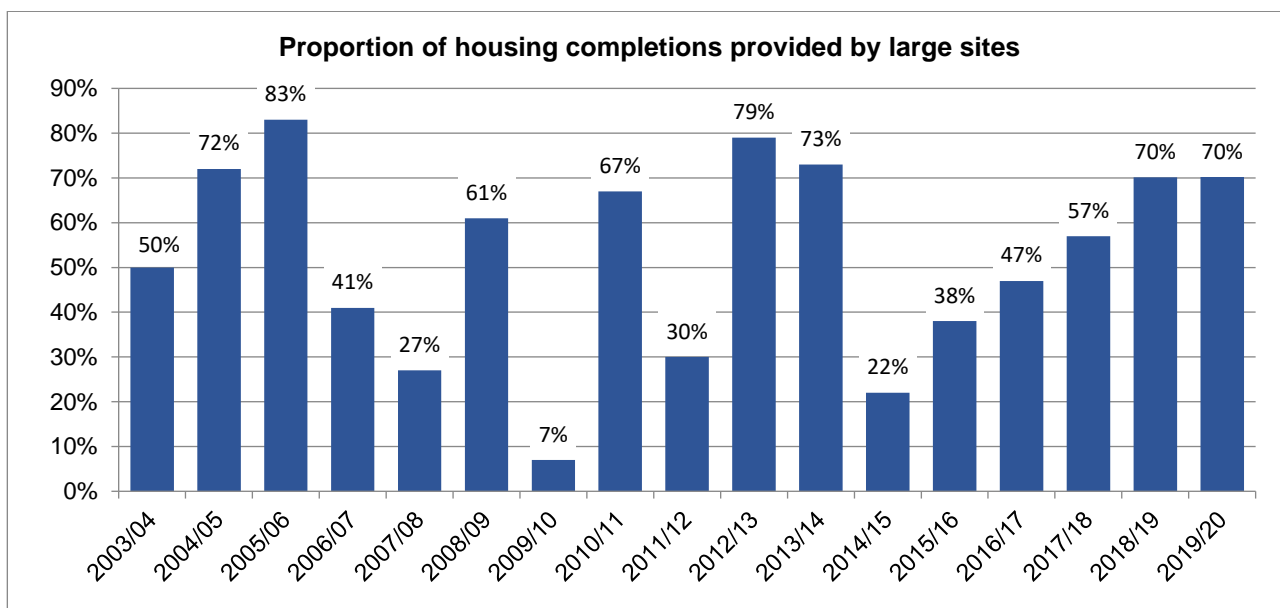
¹¹ http://www.richmond.gov.uk/home/services/planning/planning_policy/local_plan/authority_monitoring_report.htm

Net additional dwellings for the reporting year

A net gain of 331 units was completed in 2019/20. This exceeded the target, following the previous year which had a higher completion rate. There continue to be sites under construction and permissions granted, as set out in this report and in the accompanying spreadsheet, which demonstrate a continued pipeline. The net gain includes 46 units (14%) completed through the prior approval process. This is the same amount as in 2018/19, and lower than the 23% reported in 2017/18.

There were units completed on six large sites in 2019/20 (these are defined as being of 10 or more units gross). Large sites therefore provided 70% of the units completed in 2019/20 which is the same amount as in 2018/19. The large sites with completed units were at the former Teddington Studios site (Teddington Riverside); Twickenham Railway Station (Twickenham Gateway); the former HMP Latchmere House, Ham (Richmond Chase); Garrick House, Hampton Hill; and at the former Avenue Centre, Hampton Wick (Haydon Close).

Figure 1: Proportion of housing completions provided by large sites.

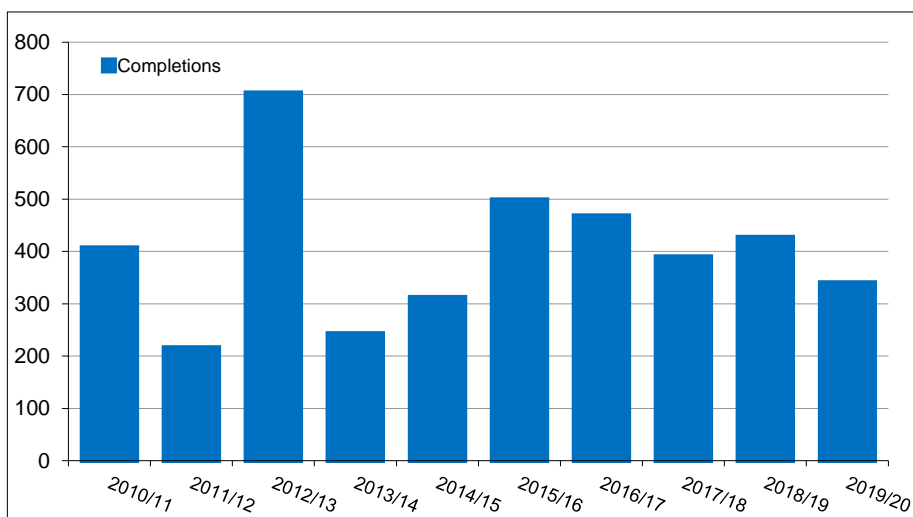


Net additional dwellings 2010/2011 to 2019/20

Historic housing completions over the last 10 years are outlined below. The 10-year average is 392 dwellings each year, and the last 5 years have provided an average of 417 dwellings.

Table 2: Housing completions in the borough 2010/11 to 2019/20

Year	Completions
2010/11	399
2011/12	208
2012/13	695
2013/14	235
2014/15	304
2015/16	491
2016/17	460
2017/18	382
2018/19	419
2019/20	331
Total	3,924



Housing completions in 2019/20 by ward

The distribution of housing completions for 2019/20 by ward is set out in the following table.

Table 3: Housing completions in 2019/20 by ward

Ward	Proposed	Existing	Net Gain
Barnes	8	4	4
East Sheen	6	2	4
Fulwell and Hampton Hill	34	4	30
Ham, Petersham and Richmond Riverside	34	1	33
Hampton	7	2	5
Hampton North	1	2	-1
Hampton Wick	17	2	15
Heathfield	4	3	1
Kew	9	2	7
Mortlake and Barnes Common	11	0	11
North Richmond	5	1	4
South Richmond	7	7	0
South Twickenham	14	2	12
St. Margarets and North Twickenham	34	6	28
Teddington	169	5	164
Twickenham Riverside	11	4	7
West Twickenham	5	3	2
Whitton	6	1	5
Total	382	51	331

Future Housing Supply and Implementation Strategy - Housing Trajectory as at 1st April 2020

Table 2 above shows that from 1st April 2010 until 31st March 2020, a ten-year period, 3,924 units were completed, which is an average of 392 per year. The borough's housing target set out in the 2015 London Plan is an additional 3,150 units between 2015 and 2025, providing for an annual average of 315 units. This requirement was exceeded in the 2019/20 financial year, and the Council is on course to meet the strategic dwelling requirement by 2025.

The NPPF requires Local Planning Authorities to identify and maintain a rolling 5-year housing land supply. Sites for inclusion should be specific, deliverable – the NPPF definition sets out sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years, with further guidance in Planning Practice Guidance.

In identifying sites which meet this requirement the following have been included:

- Sites that are allocated for housing in in adopted/emerging Plans + other identified large sites coming forward (with up to date information) assessed as deliverable within 5 years
- Sites that have planning permission (either outline or full planning permission not implemented) assessed as deliverable within 5 years
- Sites under construction assessed as deliverable within 5 years
- All conversion sites under construction
- All conversion sites with full planning permission
- All conversion sites with prior notification approval under construction
- All conversion sites with prior notification approval

Each site has been assessed for its deliverability, in discussions with officers in development management and using monitoring resources, including details from landowners/developers where known, for clear evidence that completions will begin within five years. Where no evidence was available of a site being developed within five years, sites have been removed from the 5-year housing land supply.

The Council has identified a potential **2,219** units over the 5-year period, which exceeds the remaining target in the London Plan 2015. It also exceeds the expected target in the emerging new London Plan. Table 4 below details the sources of this supply. This exceeds the NPPF requirements of an additional buffer of 5% to ensure choice and competition in the market for land.

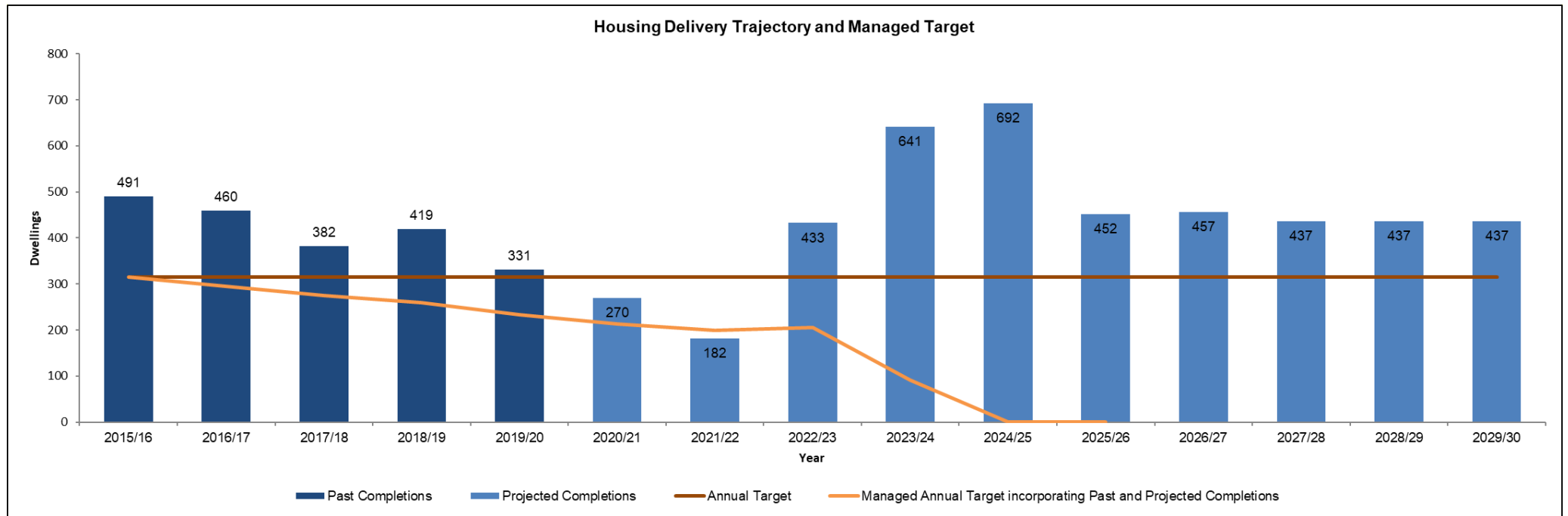
Table 4: Sources of 5-year housing land supply

Site Type	Total used for 5-year supply
New Build under construction	452
New Build Sites with planning permission	118
Conversion sites under construction	90
Conversion sites with planning permission	118
Conversion sites with prior notification approval	50
Deliverable Sites	1,381
Total 5-year supply	2,219

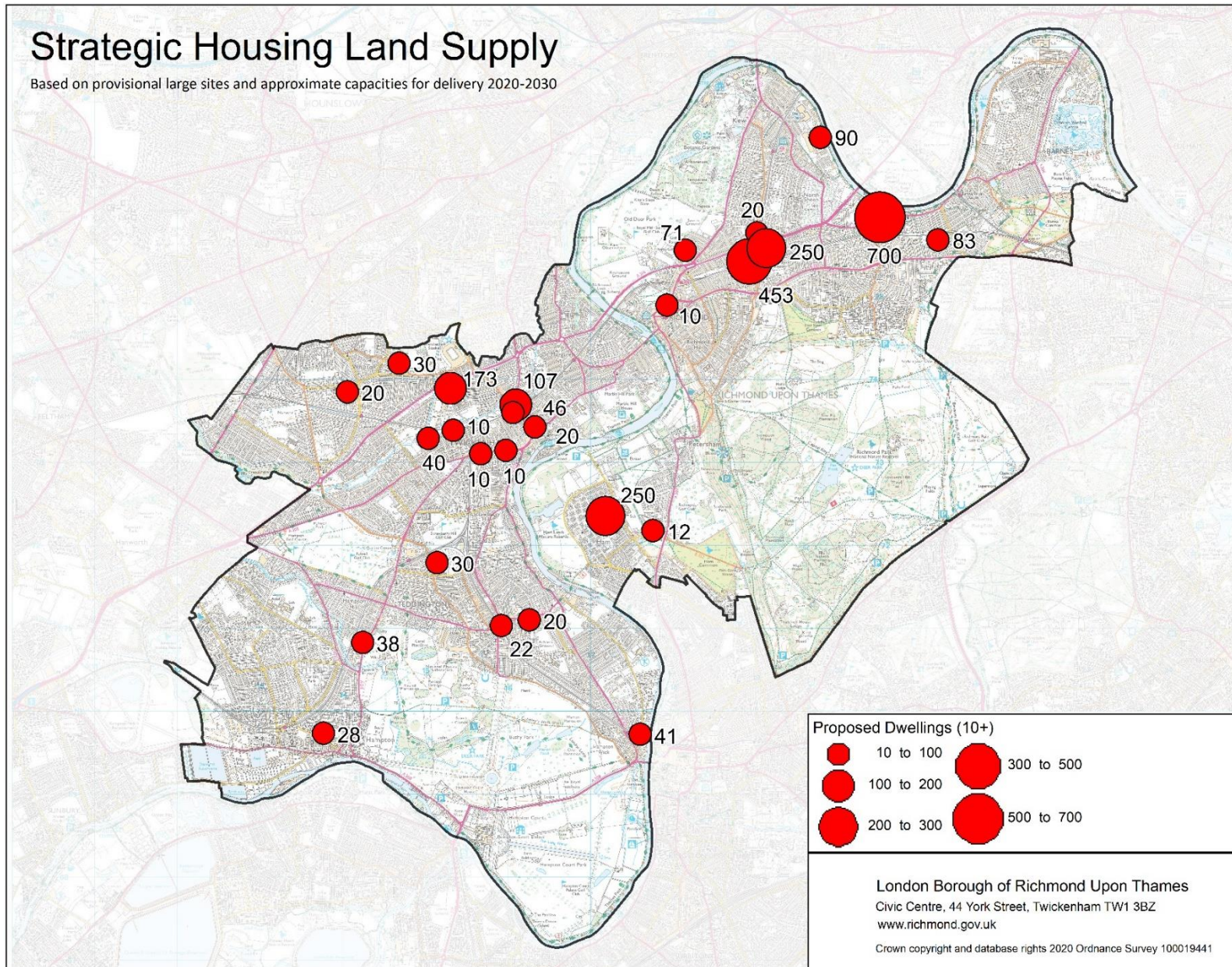
The trajectory at Figure 2 reflects the future year housing land supply and includes indicative phasing within the five-year housing land supply, to reflect the expected pattern over individual years. It is expected that delivery will be higher than identified in the later years of the five-year phase, as sites not yet identified will come through the planning system.

Further information on both small sites and large sites (over 10 units gross) included in the housing land supply can be found in the accompanying spreadsheet which details dwellings expected to come forward in future years together with a five-year housing land supply calculation. It also contains a summary of other data outputs in tables and charts.

Figure 2: Housing Trajectory as at 1st April 2020



Map 1: Strategic Housing Land Supply – Provisional Large Sites and Approximate Capacities for delivery 2020-2030



Net additional gypsy and traveller pitches per annum

There is currently one authorised site in the borough at Bishops Grove in Hampton which has 12 pitches, managed by Richmond Housing Partnership (RHP).

The Council's research on Gypsies and Travellers ([report](#) published in 2016) found that there is no demonstrated need for any additional pitches within the Borough; which informed Policy LP37 in the Local Plan (adopted July 2018).

Percentage of new housing development on back garden land as a proportion of all housing completions

Since April 2009 the Council has been monitoring permissions that represent garden development. With no national or regional definition, this is based on a local definition of garden development which focuses on the loss of suburban gardens rather than intensification or the loss of other (non-residential) open space which can be monitored through other measures. It therefore includes housing development within the curtilage of an existing dwelling house – but only where these applications would result in a net increase in dwellings within the existing curtilage.

Local Plan Policy LP39 sets out a presumption against loss of back gardens, recognising in some cases a limited scale of back garden development may be considered acceptable.

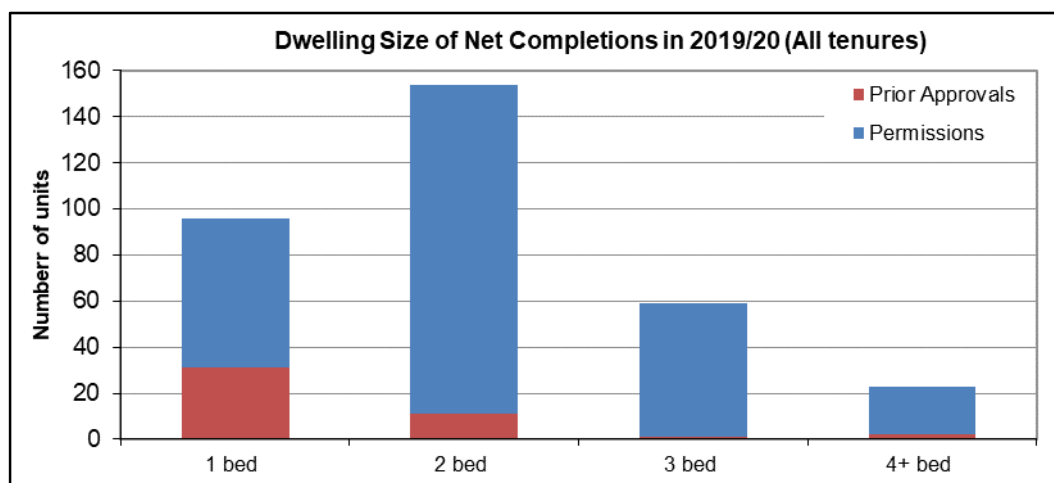
In terms of completions, 3 units (net gain) were completed on 3 sites that were considered to fall within the Council's definition of garden development, which equates to less than 1% of completions.

Completions by dwelling size

Local Plan Policy LP35 seeks a higher proportion of small units within the five main centres and Areas of Mixed Use, although continues to recognise the mix should be appropriate to the location.

The figure below shows all housing completions in 2019/20 by the size of dwelling.

Figure 3: Dwelling Size of Completions



In 2019/20, 29% of all completions were small units (studio/1 bed) which is lower than previous years. In 2018/19 34% of all completions were small units, 40% in 2017/18; 36% in 2016/17; 46% in 2015/16 and 50% in 2014/15. The proportion of family housing as 3 and 4+ beds remained low at 25% of all completions.

Table 5: Net Completions 2019/20: Dwelling Size

Dwelling Size	Total	%
1 bed	97	29%
2 bed	154	47%
3 bed	61	18%
4+ bed	19	6%
Total	331	100%

Affordable Housing

Table 6: Affordable Housing Completions by financial year 2005/06 – 2019/20

Year	Open Market		Affordable		Total Units
	Units	%	Units	%	
2005/06	611	73%	231	27%	842
2006/07	192	83%	38	17%	230
2007/08	257	99%	3	1%	260
2008/09	338	78%	98	22%	436
2009/10	145	100%	0	0%	145
2010/11	273	68%	126	32%	399
2011/12	133	64%	75	36%	208
2012/13	468	67%	227	33%	695
2013/14	202	86%	33	14%	235
2014/15	298	98%	6	2%	304
2015/16	392	80%	99	20%	491
2016/17	398	87%	62	13%	460
2017/18	341	89%	41	11%	382
2018/19	349	83%	70	17%	419
2019/20	297	90%	34	10%	331
Total	4,694	80%	1,143	20%	5,837

Affordable housing completions

Affordable housing was completed on two sites during 2019/20 delivering 34 units. The redevelopment of The Avenue Centre, Normansfield Avenue, Hampton Wick (15/5216/FUL) delivered a 100% affordable housing development of 15 units, and the former Teddington Studios, Broom Road, Teddington (17/1286/VRC) had 15 affordable units. A development at Craig Road, Ham also provided 4 affordable dwellings.

The net gain of 34 affordable units in 2019/20 is lower than the 70 affordable units completed in 2018/19.

In terms of future affordable housing supply, a number of sites including affordable housing units are under construction as detailed in the accompanying spreadsheet. As set out in the Summary Position Statement above, the Council's recent Affordable Housing Update to the Adult Social Services, Health and Housing Committee on 8 September 2020 estimates 182 affordable homes completing 2021/22 to 2022/23 as forecasts currently stand, and notes estimates of delivery over the next ten years identify the potential to now deliver well over 1,000 affordable homes.

It should be noted that the figures for affordable housing prepared for statutory planning monitoring differ from those prepared for statutory housing monitoring because of the use of different criteria. Data provided through the monitoring of planning decisions, as in this report, always produce lower figures than those provided for housing returns, which include affordable housing secured through change of tenure e.g. through acquisition by RSLs (registered social landlords) of properties on the open market, for example, and are presented as gross, rather than net, figures. They are not directly compatible either in terms of which year a property completion may be recorded in, as Planning will only record completed units once all the units on a site have been completed, but Housing will count the affordable housing units once the RSL has obtained practical completion of the scheme, and generally planning agreements require affordable housing to be completed and handed over before occupation of general market units. Therefore, these dates are rarely the same and can fall in different recording years. Housing monitoring is set out on the Council's website www.richmond.gov.uk/completed_housing_developments.htm

Off-site contributions towards affordable housing are reported separately in [AMR](#) reports on Planning Obligations. The additional contributions to the Affordable Housing Fund provided by implementing Policy LP36 on all small sites will be available to help ensure schemes remain viable. However, there is a time lag for the potential contributions secured from these sites to be received by the Council following implementation of a permission and the relevant trigger in a planning obligation reached.

The Council funds a Housing Capital Programme to support the development of affordable housing to meet the needs of borough residents. Capital resources for this programme come from a variety of sources including Council funding and financial contributions to the Affordable Housing Fund¹². Support from this funding may be available to help ensure schemes remain viable, particularly to ensure that larger family rented units remain affordable. There is sometimes a time lag between funding being agreed (at the time is permission granted) and the timing of payments, and payments may be staged.

Non-conventional supply

The non-conventional housing supply includes non-self-contained C2 Residential institutions - Residential care homes, hospitals, nursing homes, boarding schools, residential colleges and training centres.

There were two completed developments in 2019/20 that resulted in the loss of non-self-contained units.

- 17/2995/FUL - 24 Larkfield Road, Richmond
Change of use from a House in Multiple Occupation (Use Class C4) to create three self-contained flats (Use Class C3) - resulted in the loss of 5 non-self-contained units
- 19/2300/FUL - 102 - 104 Kew Road, Richmond
Conversion of existing 2 x 3 bed maisonettes into 7 No. self-contained Studio and 1 bed Flats.

There were two completed developments that resulted in the gain of non-self-contained units.

- 17/4238/FUL - 105 Queens Road, Teddington
Demolition of the existing bungalow and construction of a new 6-bedroom detached house, to be used as a children's home

- 19/3586/ES191 - 29 Heathside, Whitton
Lawful development certificate for the existing use of the dwelling as a 6no. bedroom house in multiple occupation

There are two developments currently under construction resulting in the loss of non-self-contained units:

- 16/3506/FUL - Somerville House, 1 Rodney Road, Twickenham – Demolition of the existing building and erection of 2 buildings at single-storey and three-stories to provide 24 affordable residential units (sheltered accommodation for older people of the minimum age of 55)
- 19/0111/FUL - Sons of the Divine Providence, Station Road and Lower Teddington Road, Hampton Wick
- Erection of an independent senior living extra care building comprising of 28 units (following demolition of existing care home) at 12 - 14 Station Road, the refurbishment and renovation of Nos.13 and 23 - 33 Lower Teddington Road

¹² <https://cabnet.richmond.gov.uk/documents/s86420/LBR%20Affordable%20Housing%20Update%20Report%208-9-20.pdf>
<https://cabnet.richmond.gov.uk/ieListDocuments.aspx?CId=798&Mid=4917>

Richmond upon Thames - Authority Monitoring Report

Housing Land Financial Year Report 2019/20 - Position at 1st April 2020

November 2020

Table 1 Performance against London Plan (July 2011) target (2011 to 2021)

Additional Homes (net)	London Plan Target	Provision (90% of plan period)									Total	% of Target
		2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20		
Conventional Supply	2,450	208	695	235	304	491	460	382	419	331	3,525	144%

Table 2 Performance against Further Alterations to the London Plan (2015) target (2015 to 2025)

Additional Homes (net)	London Plan Target	Provision (50% of plan period)					Total	% of Target
		2015/16	2016/17	2017/18	2018/19	2019/20		
Conventional Supply	3,150	491	460	382	419	331	2,083	66%

Table 3 Five year housing land supply calculation methodology

a	London Plan (FALP) Requirement 1 April 2015 to 31 March 2025 (10 year plan period)		3,150
b	Net completions 1 April 2015 to 31 March 2020		2,083
c	Remaining London Plan Requirement 31 March 2020 to 31 March 2025 (5 year plan period)	a - b	1,067
d	Average per year	c ÷ 5 years	213
e	Five year requirement	d x 5	1,067
f	Five percent buffer	e x 0.05	53
g	Total five year requirement (including 5% buffer)	e + f	1,120
h	Estimated supply over five year period		2,219
i	Five year land supply as a percentage of requirement (including 5% buffer)	(h ÷ e) x 100	198%
j	Five year land supply expressed in years	h ÷ d	10.4

Table 4 Five year housing land supply calculation methodology - Intend to Publish London Plan 2019

a	Draft New London Plan Requirement - 1 April 2020 to 1 April 2030 (10 year plan period)		4,110
b	Net completions 1 April 2019 to 31 March 2020		331
c	Remaining London Plan Requirement (9 year plan period)	a - b	3,779
d	Average per year	c ÷ 9 years	420
e	Five year requirement	d x 5	2,099
f	Five percent buffer	e x 0.05	105
g	Total five year requirement (including 5% buffer)	e + f	2,204
h	Estimated supply over five year period		2,219
i	Five year land supply as a percentage of requirement (including 5% buffer)	(h ÷ e) x 100	101%
j	Five year land supply expressed in years	h ÷ d	5.3

Richmond upon Thames - Authority Monitoring Report

Housing Land Financial Year Report 2019/20 - Position at 1st April 2020

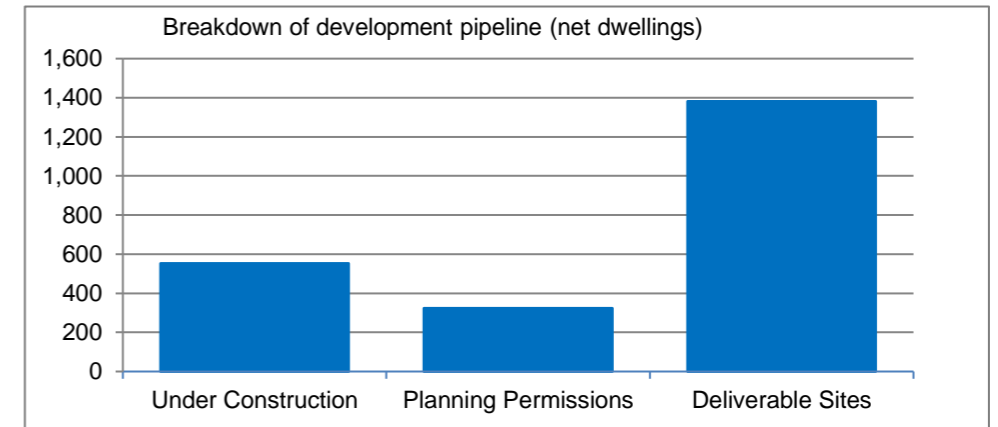
November 2020

Table 5 Estimated supply over five year period

Site Type	Total used for 5-year supply
New Build Sites under construction	462
New Build Sites with planning permission	118
Conversion sites under construction	90
Conversion sites with planning permission	118
Conversion sites with prior notification approval	50
Deliverable Sites	1,381
Total 5 year supply	2,219

Table 6 Housing land capacity at 1st April 2020

Housing Capacity	New Build		Conversions		Total	
	Gross	Net	Gross	Net	Gross	Net
Completed 2019/20	282	269	100	62	382	331
Under Construction	530	462	125	90	655	552
Planning Permissions	193	156	201	168	394	324
Deliverable Sites	1,381	1,381	0	0	1,381	1,381
Total Pipeline	2,104	1,999	326	258	2,430	2,257



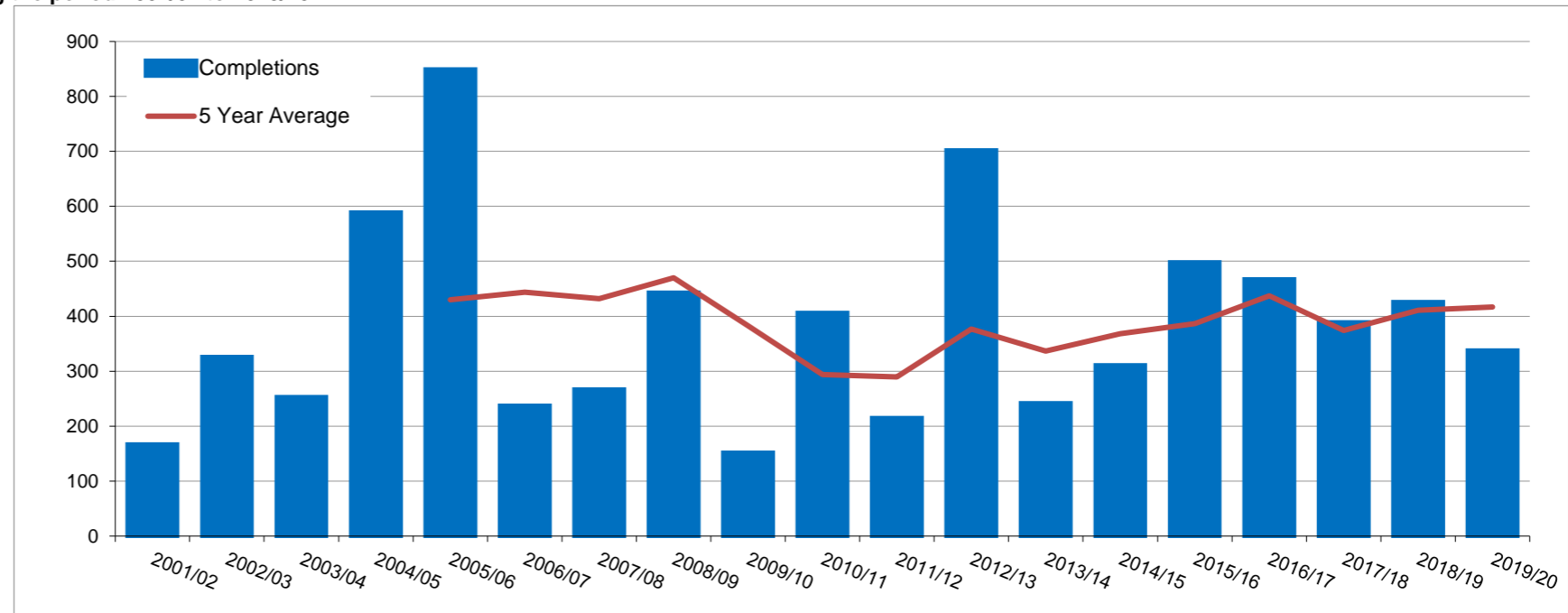
Richmond upon Thames - Authority Monitoring Report

Housing Land Financial Year Report 2019/20 - Position at 1st April 2020

November 2020

Table 7 Net units completed during the period 2001/02 to 2019/20

Year	Completions	5 Year Average
2001/02	160	
2002/03	319	
2003/04	246	
2004/05	582	
2005/06	842	430
2006/07	230	444
2007/08	260	432
2008/09	436	470
2009/10	145	383
2010/11	399	294
2011/12	208	290
2012/13	695	377
2013/14	235	336
2014/15	304	368
2015/16	491	387
2016/17	460	437
2017/18	382	374
2018/19	419	411
2019/20	331	417

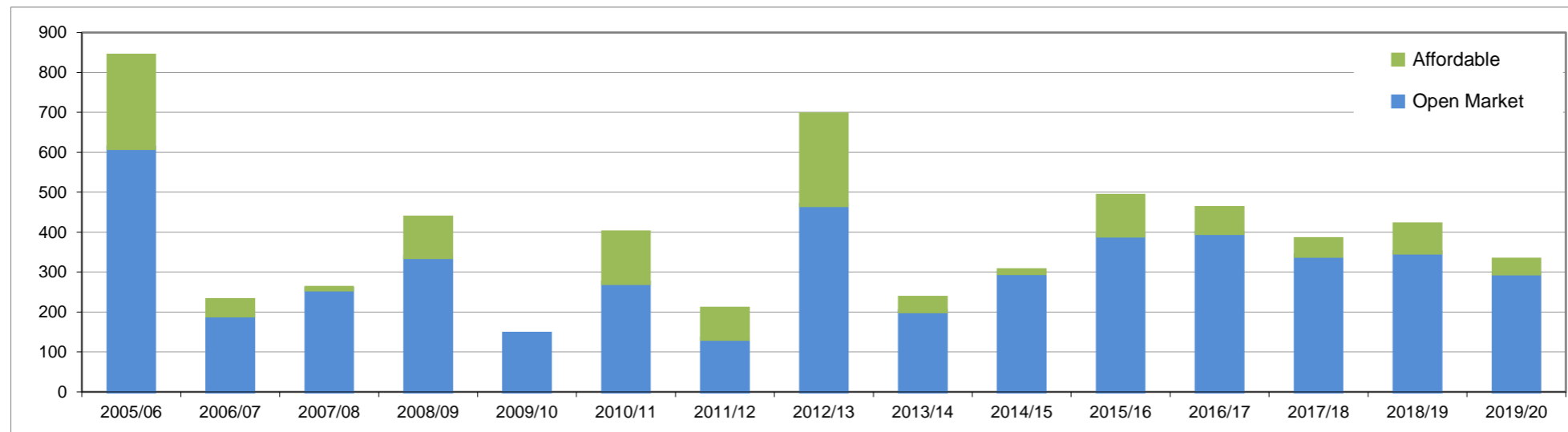
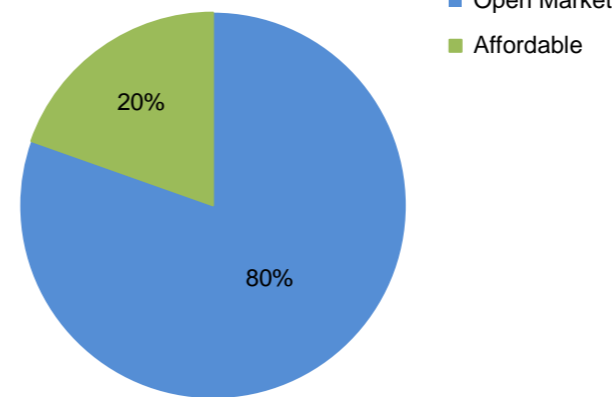


Completions

Table 8 Net completions by tenure and financial year (2005/06 to 2019/20)

Year	Open Market		Affordable		Total Units
	Units	%	Units	%	
2005/06	611	73%	231	27%	842
2006/07	192	83%	38	17%	230
2007/08	257	99%	3	1%	260
2008/09	338	78%	98	22%	436
2009/10	145	100%	0	0%	145
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2017/18	341	89%	41	11%	382
2018/19	349	83%	70	17%	419
2019/20	297	90%	34	10%	331
Total	4,694	80%	1,143	20%	5,837

Net completions by tenure and financial year (2005/06 to 2019/20)



Richmond upon Thames - Authority Monitoring Report

Housing Land Financial Year Report 2019/20 - Position at 1st April 2020

November 2020

Table 9 Dwelling Size of Net Completions 2019/20 (All tenures)

Dwelling Type / Size	Permissions	Prior Approvals	Total	%
1 bed	65	32	97	29%
2 bed	143	11	154	47%
3 bed	60	1	61	18%
4+ bed	17	2	19	6%
Total	285	46	331	100%
Percentage	86%	14%		

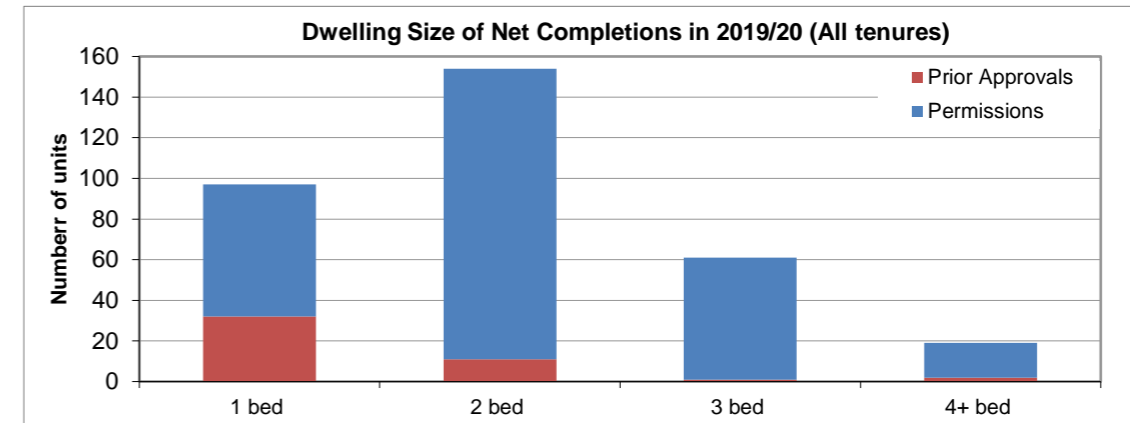


Table 10 Dwelling Size of Net Completions 2016/17 - 2019/20 (All tenures)

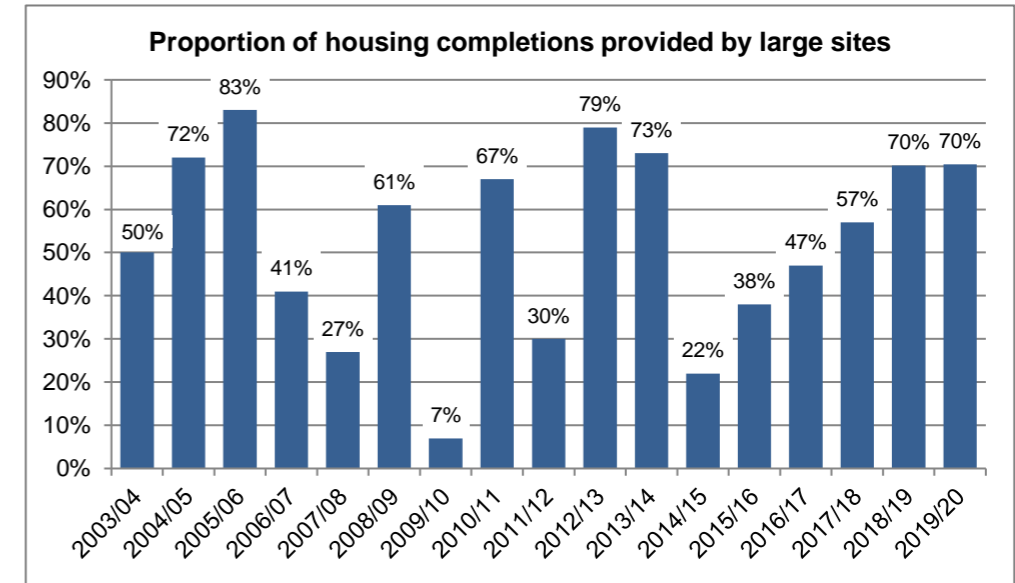
Dwelling Type / Size	Permissions	Prior Approvals	Total	% Permissions	% Prior Approvals
2016/17	304	156	460	66%	34%
2017/18	294	88	382	77%	23%
2018/19	360	59	419	86%	14%
2019/20	287	45	332	86%	14%
Total	1,245	348	1,593		
Percentage	78%	22%			

Table 11 Proportion of housing completions provided by large sites

Year	%
2003/04	50%
2004/05	72%
2005/06	83%
2006/07	41%
2007/08	27%
2008/09	61%
2009/10	7%
2010/11	67%
2011/12	30%
2012/13	79%
2013/14	73%
2014/15	22%
2015/16	38%
2016/17	47%
2017/18	57%
2018/19	70%
2019/20	70%

Table 12 Net completions on small / large sites

Year	Small	Large	Total	% Small	% Large
2013/14	63	172	235	27%	73%
2014/15	238	66	304	78%	22%
2015/16	304	187	491	62%	38%
2016/17	242	218	460	53%	47%
2017/18	165	217	382	43%	57%
2018/19	125	294	419	30%	70%
2019/20	98	233	331	30%	70%
Total	1,235	1,387	2,622	47%	53%
Average	176	198	375	46%	54%



Spatial Areas

Town Centres

Table 13 Net completions within town centre boundaries

Town Centre	2019/20
East Sheen	4
Richmond	1
Teddington	7
Twickenham	27
Whitton	5
Total in Town Centres	44

Policy Areas

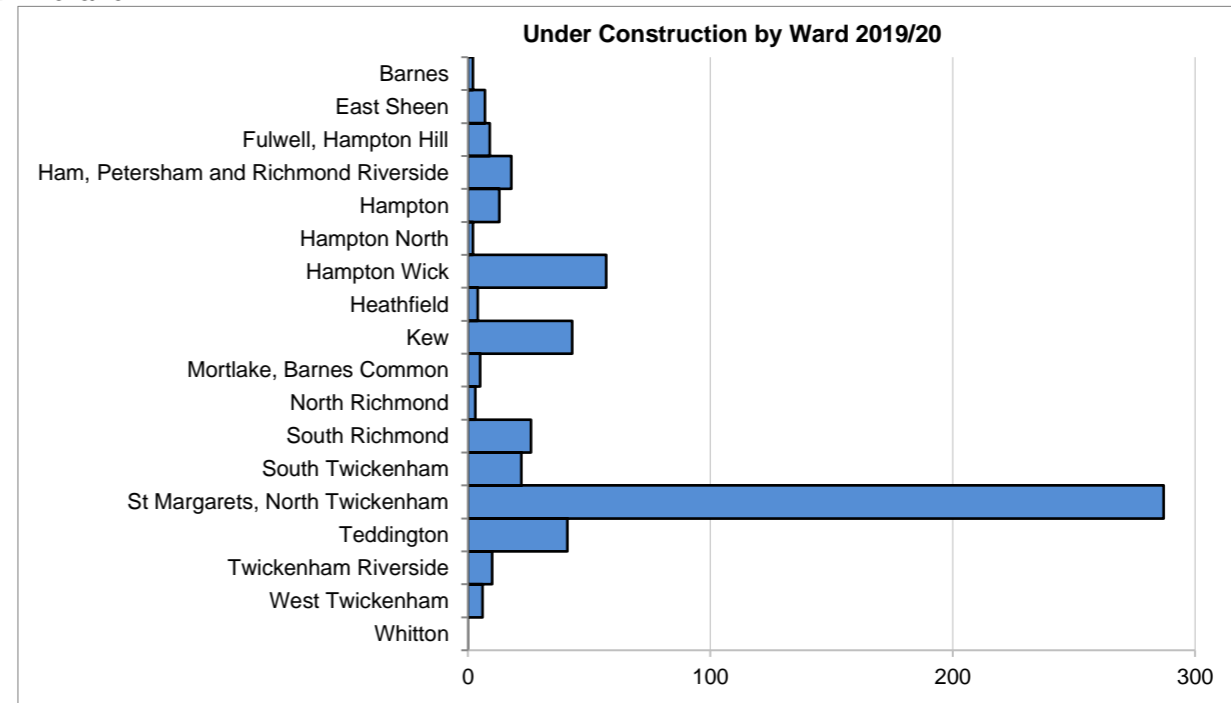
Table 14 Net completions by policy areas

Policy Area	2019/20
Town Centres	44
Thames Policy Area	155
Mixed Use Area	54
OOLTI	0
Green Belt MOL	0
Garden Land	3
Conservation Area	62

Wards

Table 15 Net units with planning permission, commenced or completed by Ward in 2019/20

Ward	Not Started	Under Construction	Completions
Barnes	5	2	4
East Sheen	24	7	4
Fulwell, Hampton Hill	62	9	30
Ham, Petersham and Richmond Riverside	0	18	33
Hampton	43	13	5
Hampton North	5	2	-1
Hampton Wick	22	57	15
Heathfield	2	4	1
Kew	8	43	7
Mortlake, Barnes Common	11	5	11
North Richmond	88	3	4
South Richmond	7	26	0
South Twickenham	13	22	12
St Margarets, North Twickenham	4	287	28
Teddington	11	41	164
Twickenham Riverside	12	10	7
West Twickenham	5	6	2
Whitton	2	-3	5
Total	324	552	331



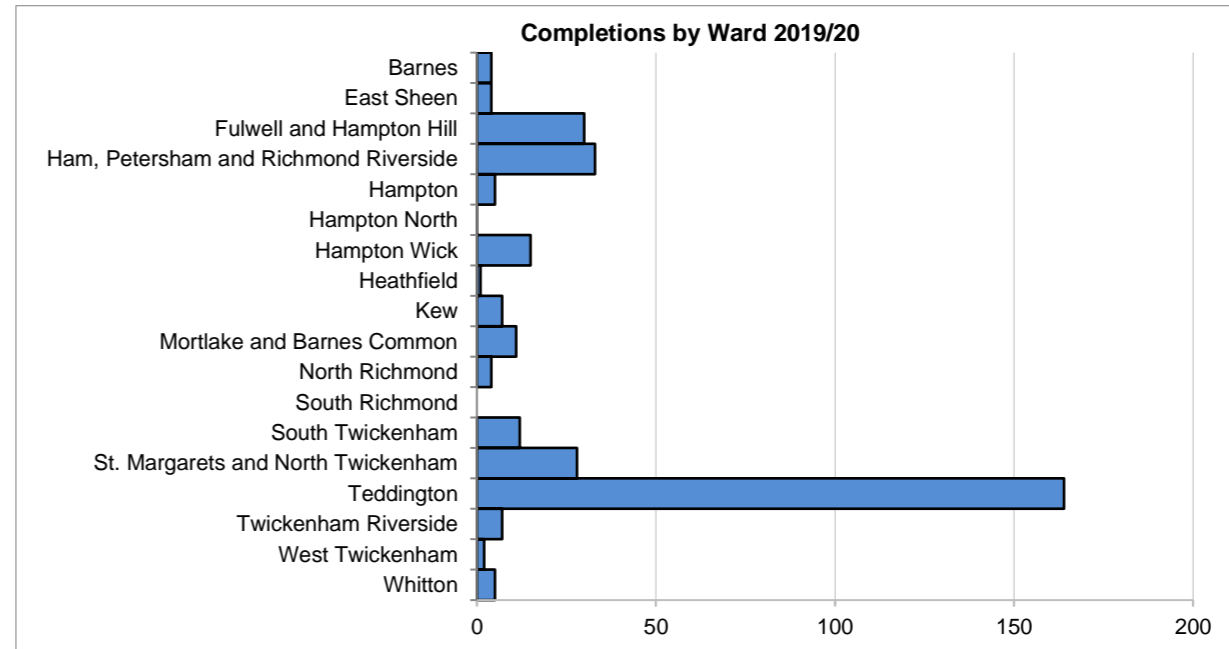
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Table 16 Net units completed by Ward in 2019/20

Ward	Proposed	Existing	Net Gain
Barnes	8	4	4
East Sheen	6	2	4
Fulwell and Hampton Hill	34	4	30
Ham, Petersham and Richmond Riverside	34	1	33
Hampton	7	2	5
Hampton North	1	2	-1
Hampton Wick	17	2	15
Heathfield	4	3	1
Kew	9	2	7
Mortlake and Barnes Common	11	0	11
North Richmond	5	1	4
South Richmond	7	7	0
South Twickenham	14	2	12
St. Margarets and North Twickenham	34	6	28
Teddington	169	5	164
Twickenham Riverside	11	4	7
West Twickenham	5	3	2
Whitton	6	1	5
Total	382	51	331



Dwelling Mix

Table 17 Net new build units completed by unit size and tenure

	1 bed	2 bed	3 bed	4 + bed	Not Known	Total
Market	44	114	62	15	0	235
	16%	42%	23%	6%	0%	87%
Intermediate	0	0	0	0	0	0
	0%	0%	0%	0%	0%	0%
Affordable Rented	9	20	5	0	0	34
	3%	7%	2%	0%	0%	13%
Total	53	134	67	15	0	269
	20%	50%	25%	6%	0%	100%

Net new build units completed by unit size

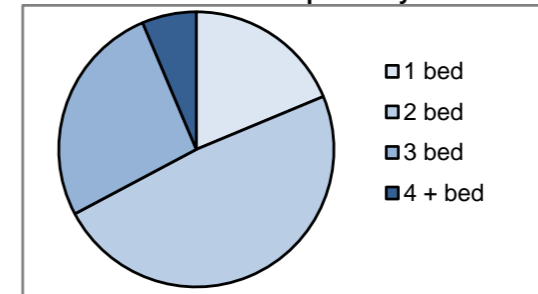


Table 18 Net new build units under construction by unit size and tenure

	1 bed	2 bed	3 bed	4 + bed	Not Known	Total
Market	103	208	57	44	0	412
	22%	45%	12%	10%	0%	89%
Intermediate	20	12	0	0	0	32
	4%	3%	0%	0%	0%	7%
Affordable Rented	22	13	10	3	0	48
	5%	3%	2%	1%	0%	10%
Social Rented	-29	-1	0	0	0	-30
	-6%	0%	0%	0%	0%	-6%
Total	116	232	67	47	0	462
	25%	50%	15%	10%	0%	100%

Net new build units under construction by unit size

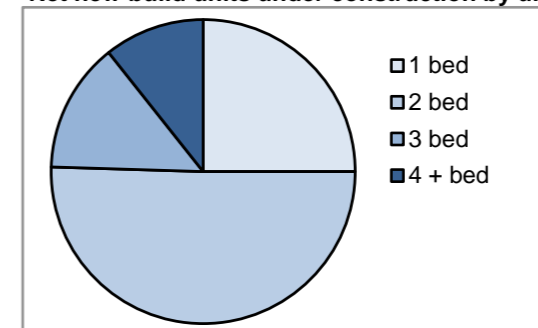
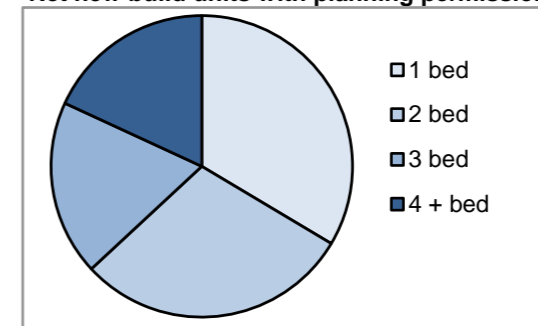


Table 19 Net new build units with planning permission by unit size and tenure

	1 bed	2 bed	3 bed	4 + bed	Not Known	Total
Market	50	44	28	27	0	149
	11%	10%	6%	6%	0%	32%
Intermediate	0	0	0	0	0	0
	0%	0%	0%	0%	0%	0%
Affordable Rented	0	0	3	4	0	7
	0%	0%	1%	1%	0%	2%
Total	50	44	31	31	0	156
	32%	28%	20%	20%	0%	100%

Net new build units with planning permission by unit size



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Housing Land Financial Year Report 2019/20 - Position at 1st April 2020

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Future Housing Supply

Table 20 Housing Land Supply by ward (net gain) 2020/21 – 2024/25

	Housing Land Supply 2020/21 – 2024/25							2025-2029	
	New Build Sites Under Construction	New Build Sites with planning permission	Conversion Sites Under Construction	Conversion Sites with planning permission	Prior Approval Sites Under Construction	Prior Approval Sites with approval	Proposal / Other known large sites	Total	Proposal / Other known large sites
Barnes	2	4	0	-1	0	2	0	7	0
East Sheen	2	2	4	0	1	22	0	31	0
Fulwell and Hampton Hill	6	41	3	15	0	6	20	91	0
Ham, Petersham and Richmond Riverside	22	0	-4	0	0	0	0	18	500
Hampton	10	37	3	6	0	0	0	56	0
Hampton North	2	4	0	1	0	0	0	7	0
Hampton Wick	42	19	7	3	8	0	0	79	0
Heathfield	4	2	0	0	0	0	0	6	0
Kew	34	1	4	1	5	6	90	141	0
Mortlake and Barnes Common	1	10	2	0	2	1	383	399	400
North Richmond	2	7	-1	81	2	0	80	171	0
South Richmond	17	4	9	3	0	0	0	33	0
South Twickenham	9	10	3	3	10	0	0	35	40
St. Margarets and North Twickenham	281	4	0	0	6	0	0	291	0
Teddington	29	1	12	-1	0	11	0	52	20
Twickenham Riverside	1	7	0	3	9	2	46	68	20
West Twickenham	2	1	1	4	3	0	0	11	0
Whitton	-4	2	0	0	1	0	20	19	30
Small Sites Trend	0	0	0	0	0	0	742	742	1,170
Total	462	156	43	118	47	50	1,381	2,257	2,180

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Table 1 Performance against London Plan (July 2011) target (2011 to 2021)

Additional Homes (net)	London Plan Target	Provision (90% of plan period)										Total	% of Target
		2011/12	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20			
Conventional Supply	2,450	208	695	235	304	491	460	382	419	331	3,525	144%	

Table 2 Performance against Further Alterations to the London Plan (2015) target (2015 to 2025)

Additional Homes (net)	London Plan Target	Provision (50% of plan period)					Total	% of Target
		2015/16	2016/17	2017/18	2018/19	2019/20		
Conventional Supply	3,150	491	460	382	419	331	2,083	66%

Table 3 Five year housing land supply calculation methodology

a	London Plan (FALP) Requirement 1 April 2015 to 31 March 2025 (10 year plan period)		3,150
b	Net completions 1 April 2015 to 31 March 2020		2,083
c	Remaining London Plan Requirement 31 March 2020 to 31 March 2025 (5 year plan period)	a - b	1,067
d	Average per year	c ÷ 5 years	213
e	Five year requirement	d x 5	1,067
f	Five percent buffer	e x 0.05	53
g	Total five year requirement (including 5% buffer)	e + f	1,120
h	Estimated supply over five year period		2,219
i	Five year land supply as a percentage of requirement (including 5% buffer)	(h ÷ e) x 100	198%
j	Five year land supply expressed in years	h ÷ d	10.4

Table 4 Five year housing land supply calculation methodology - Intend to Publish London Plan 2019

a	Draft New London Plan Requirement - 1 April 2020 to 1 April 2030 (10 year plan period)		4,110
b	Net completions 1 April 2019 to 31 March 2020		331
c	Remaining London Plan Requirement (9 year plan period)	a - b	3,779
d	Average per year	c ÷ 9 years	420
e	Five year requirement	d x 5	2,099
f	Five percent buffer	e x 0.05	105
g	Total five year requirement (including 5% buffer)	e + f	2,204
h	Estimated supply over five year period		2,219
i	Five year land supply as a percentage of requirement (including 5% buffer)	(h ÷ e) x 100	101%
j	Five year land supply expressed in years	h ÷ d	5.3

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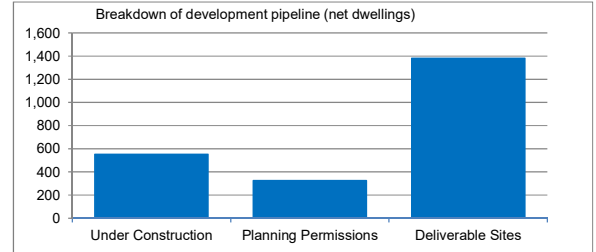
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Table 5 Estimated supply over five year period

Site Type	Total used for 5-year supply
New Build Sites under construction	462
New Build Sites with planning permission	118
Conversion sites under construction	90
Conversion sites with planning permission	118
Conversion sites with prior notification approval	50
Deliverable Sites	1,381
Total 5 year supply	2,219

Table 6 Housing land capacity at 1st April 2020

Housing Capacity	New Build		Conversions		Total	
	Gross	Net	Gross	Net	Gross	Net
Completed 2019/20	282	269	100	62	382	331
Under Construction	530	462	125	90	655	552
Planning Permissions	193	156	201	168	394	324
Deliverable Sites	1,381	1,381	0	0	1,381	1,381
Total Pipeline	2,104	1,999	326	258	2,430	2,257



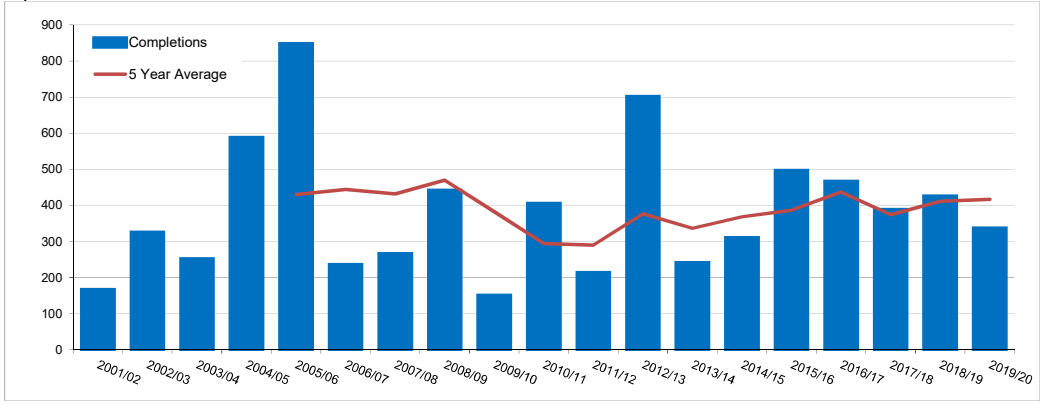
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Table 7 Net units completed during the period 2001/02 to 2019/20

Year	Completions	5 Year Average
2001/02	160	
2002/03	319	
2003/04	246	
2004/05	582	
2005/06	842	430
2006/07	230	444
2007/08	260	432
2008/09	436	470
2009/10	145	383
2010/11	399	294
2011/12	208	290
2012/13	695	377
2013/14	235	336
2014/15	304	368
2015/16	491	387
2016/17	460	437
2017/18	382	374
2018/19	419	411
2019/20	331	417



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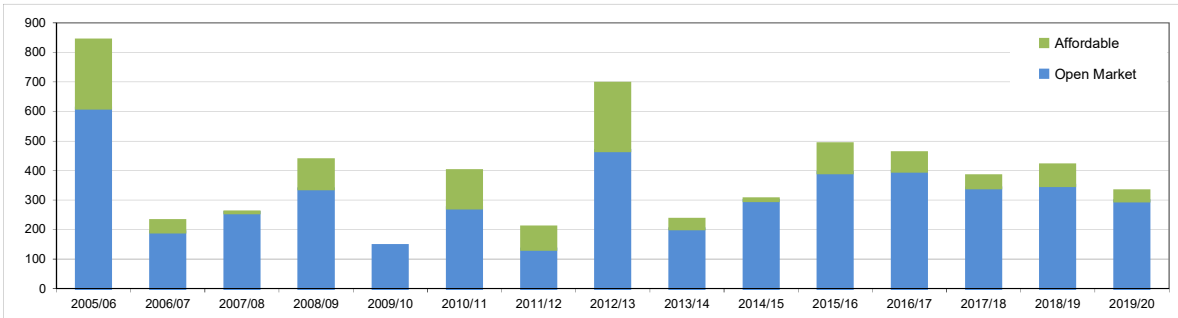
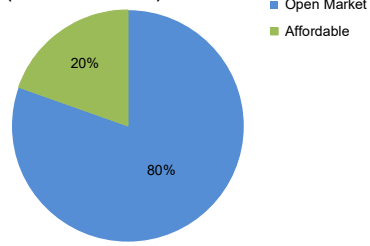
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Completions

Table 8 Net completions by tenure and financial year (2005/06 to 2019/20)

Year	Open Market		Affordable		Total Units
	Units	%	Units	%	
2005/06	611	73%	231	27%	842
2006/07	192	83%	38	17%	230
2007/08	257	99%	3	1%	260
2008/09	338	78%	98	22%	436
2009/10	145	100%	0	0%	145
2010/11	273	68%	126	32%	399
2011/12	133	64%	75	36%	208
2012/13	468	67%	227	33%	695
2013/14	202	86%	33	14%	235
2014/15	298	98%	6	2%	304
2015/16	392	80%	99	20%	491
2016/17	398	87%	62	13%	460
2017/18	341	89%	41	11%	382
2018/19	349	83%	70	17%	419
2019/20	297	90%	34	10%	331
Total	4,694	80%	1,143	20%	5,837

Net completions by tenure and financial year (2005/06 to 2019/20)



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Table 9 Dwelling Size of Net Completions 2019/20 (All tenures)

Dwelling Type / Size	Permissions	Prior Approvals	Total	%
1 bed	65	32	97	29%
2 bed	143	11	154	47%
3 bed	60	1	61	18%
4+ bed	17	2	19	6%
Total	285	46	331	100%
Percentage	86%	14%		

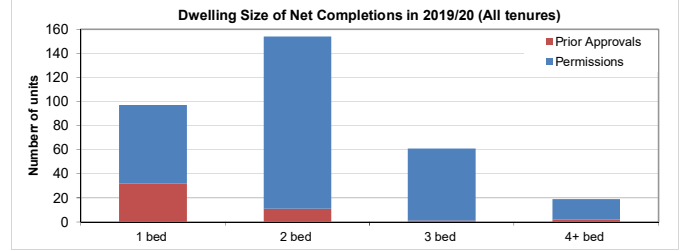


Table 10 Dwelling Size of Net Completions 2016/17 - 2019/20 (All tenures)

Dwelling Type / Size	Permissions	Prior Approvals	Total	% Permissions	% Prior Approvals
2016/17	304	156	460	66%	34%
2017/18	294	88	382	77%	23%
2018/19	360	59	419	86%	14%
2019/20	287	45	332	86%	14%
Total	1,245	348	1,593		
Percentage	78%	22%			

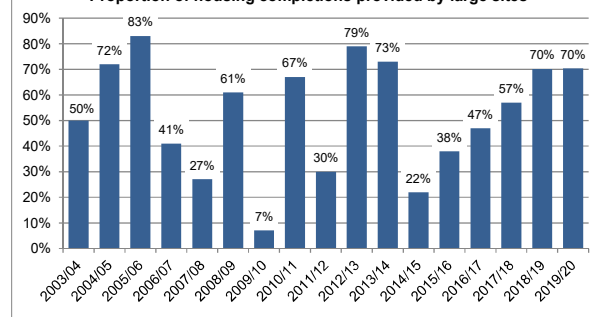
Table 11 Proportion of housing completions provided by large sites

Year	%
2003/04	50%
2004/05	72%
2005/06	83%
2006/07	41%
2007/08	27%
2008/09	61%
2009/10	7%
2010/11	67%
2011/12	30%
2012/13	79%
2013/14	73%
2014/15	22%
2015/16	38%
2016/17	47%
2017/18	57%
2018/19	70%
2019/20	70%

Table 12 Net completions on small / large sites

Year	Small	Large	Total	% Small	% Large
2013/14	63	172	235	27%	73%
2014/15	238	66	304	78%	22%
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2018/19	125	294	419	30%	70%
2019/20	98	233	331	30%	70%
Total	1,235	1,387	2,622	47%	53%
Average	176	198	375	46%	54%

Proportion of housing completions provided by large sites



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Spatial Areas

Town Centres

Table 13 Net completions within town centre boundaries

Town Centre	2019/20
East Sheen	4
Richmond	1
Teddington	7
Twickenham	27
Whitton	5
Total in Town Centres	44

Policy Areas

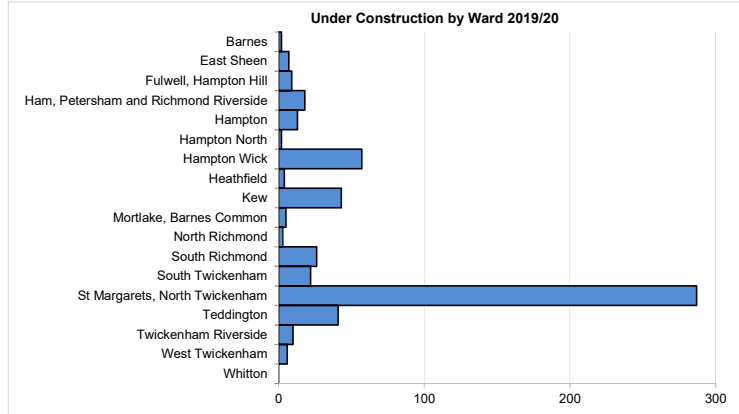
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Policy Area	2019/20
Town Centres	44
Thames Policy Area	155
Mixed Use Area	54
OOLTI	0
Green Belt MOL	0
Garden Land	3
Conservation Area	62

Wards

Table 15 Net units with planning permission, commenced or completed by Ward in 2019/20

Ward	Not Started	Under Construction	Completions
Barnes	5	2	4
East Sheen	24	7	4
Fulwell, Hampton Hill	62	9	30
Ham, Petersham and Richmond Riverside	0	18	33
Hampton	43	13	5
Hampton North	5	2	-1
Hampton Wick	22	57	15
Heathfield	2	4	1
Kew	8	43	7
Mortlake, Barnes Common	11	5	11
North Richmond	88	3	4
South Richmond	7	26	0
South Twickenham	13	22	12
St Margarets, North Twickenham	4	287	28
Teddington	11	41	164
Twickenham Riverside	12	10	7
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Whitton	2	-3	5
Total	324	552	331



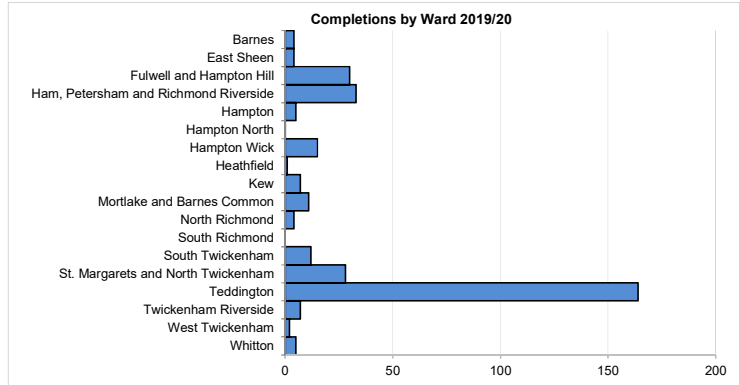
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Table 16 Net units completed by Ward in 2019/20

Ward	Proposed	Existing	Net Gain
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East Sheen	6	2	4
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Ham, Petersham and Richmond Riverside	34	1	33
Hampton	7	2	5
Hampton North	1	2	-1
Hampton Wick	17	2	15
Heathfield	4	3	1
Kew	9	2	7
Mortlake and Barnes Common	11	0	11
North Richmond	5	1	4
South Richmond	7	7	0
South Twickenham	14	2	12
St. Margarets and North Twickenham	34	6	28
Teddington	169	5	164
Twickenham Riverside	11	4	7
West Twickenham	5	3	2
Whitton	6	1	5
Total	382	51	331



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Dwelling Mix

Table 17 Net new build units completed by unit size and tenure

	1 bed	2 bed	3 bed	4 + bed	Not Known	Total
Market	44	114	62	15	0	235
	16%	42%	23%	6%	0%	87%
Intermediate	0	0	0	0	0	0
	0%	0%	0%	0%	0%	0%
Affordable Rented	9	20	5	0	0	34
	3%	7%	2%	0%	0%	13%
Total	53	134	67	15	0	269
	20%	50%	25%	6%	0%	100%

Net new build units completed by unit size

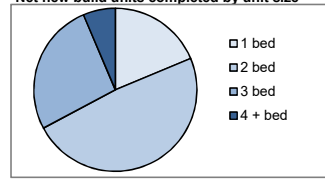


Table 18 Net new build units under construction by unit size and tenure

	1 bed	2 bed	3 bed	4 + bed	Not Known	Total
Market	103	208	57	44	0	412
	22%	45%	12%	10%	0%	89%
Intermediate	20	12	0	0	0	32
	4%	3%	0%	0%	0%	7%
Affordable Rented	22	13	10	3	0	48
	5%	3%	2%	1%	0%	10%
Social Rented	-29	-1	0	0	0	-30
	-6%	0%	0%	0%	0%	-6%
Total	116	232	67	47	0	462
	25%	50%	15%	10%	0%	100%

Net new build units under construction by unit size

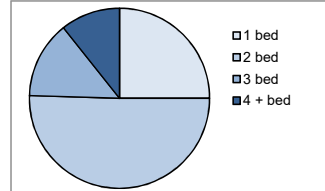
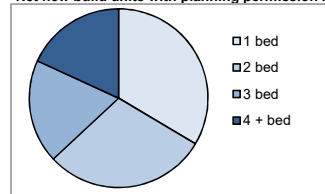


Table 19 Net new build units with planning permission by unit size and tenure

	1 bed	2 bed	3 bed	4 + bed	Not Known	Total
Market	50	44	28	27	0	149
	11%	10%	6%	6%	0%	32%
Intermediate	0	0	0	0	0	0
	0%	0%	0%	0%	0%	0%
Affordable Rented	0	0	3	4	0	7
	0%	0%	1%	1%	0%	2%
Total	50	44	31	31	0	156
	32%	28%	20%	20%	0%	100%

Net new build units with planning permission by unit size



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Future Housing Supply

Table 20 Housing Land Supply by ward (net gain) 2020/21 – 2024/25

	Housing Land Supply 2020/21 – 2024/25							2025-2029	
	New Build Sites Under Construction	New Build Sites with planning permission	Conversion Sites Under Construction	Conversion Sites with planning permission	Prior Approval Sites Under Construction	Prior Approval Sites with approval	Proposal / Other known large sites	Total	Proposal / Other known large sites
Barnes	2	4	0	-1	0	2	0	7	0
East Sheen	2	2	4	0	1	22	0	31	0
Fulwell and Hampton Hill	6	41	3	15	0	6	20	91	0
Ham, Petersham and Richmond Riverside	22	0	-4	0	0	0	0	18	500
Hampton	10	37	3	6	0	0	0	56	0
Hampton North	2	4	0	1	0	0	0	7	0
Hampton Wick	42	19	7	3	8	0	0	79	0
Heathfield	4	2	0	0	0	0	0	6	0
Kew	34	1	4	1	5	6	90	141	0
Mortlake and Barnes Common	1	10	2	0	2	1	383	399	400
North Richmond	2	7	-1	81	2	0	80	171	0
South Richmond	17	4	9	3	0	0	0	33	0
South Twickenham	9	10	3	3	10	0	0	35	40
St. Margarets and North Twickenham	281	4	0	0	6	0	0	291	0
Teddington	29	1	12	-1	0	11	0	52	20
Twickenham Riverside	1	7	0	3	9	2	46	68	20
West Twickenham	2	1	1	4	3	0	0	11	0
Whitton	-4	2	0	0	1	0	20	19	30
Small Sites Trend	0	0	0	0	0	0	742	742	1,170
Total	462	156	43	118	47	50	1,381	2,257	2,180

Appendix 9

Contents

Table 5c

Ratio of median house price to median gross annual (where available) workplace-based earnings by local authority district, England and Wales, 1997 to 2019

Region code	Region name	Code	Name	1997	1998	1999	2000	2001	2002	2003	2004	2005	2006	2007	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
E1200007	London	E09000020	Kensington and Chelsea	11.78	11.93	13.08	14.38	14.61	14.63	15.32	16.76	17.13	18.78	22.39	22.01	22.57	24.34	24.89	28.48	30.58	38.33	37.95	38.93	41.04	43.97	39.62
E1200007	London	E09000033	Westminster	6.98	7.52	8.39	9.58	10.25	10.73	11.09	10.83	11.38	12.25	12.74	13.87	13.46	14.73	16.32	16.07	19.76	22.28	22.34	24.50	24.91	24.64	21.75
E1200007	London	E09000013	Hammersmith and Fulham	5.95	7.11	7.20	8.64	9.12	8.92	9.26	10.13	10.31	11.32	11.78	12.58	11.28	13.13	12.73	13.52	15.92	18.55	21.05	20.86	20.69	19.28	19.48
E1200007	London	E09000007	Camden	6.51	6.86	7.71	8.87	9.09	9.88	9.33	9.67	10.22	10.64	12.10	12.46	11.27	12.59	13.62	13.39	15.69	17.69	18.42	19.50	20.10	19.39	19.16
E1200007	London	E09000032	Wandsworth	5.55	6.09	6.80	7.71	9.07	9.57	9.88	9.95	10.25	10.91	11.47	11.62	10.50	11.79	12.16	12.95	14.29	16.57	17.05	18.71	19.84	17.90	18.44
E12000007	London	E09000027	Richmond upon Thames	7.00	7.54	7.84	9.30	9.48	10.51	10.38	10.76	11.00	11.18	11.98	12.02	11.03	12.56	13.04	13.49	14.38	16.17	17.30	18.15	19.91	18.51	18.33
E12000009	South West	E06000053	Isles of Scilly	:	14.22	:	:	:	:	:	:	:	:	:	24.94	:	:	:	:	:	:	:	:	:	:	17.71
E12000008	South East	E07000005	Chiltern	8.02	8.68	9.77	10.65	10.72	9.85	12.00	11.51	11.85	12.09	12.72	13.37	12.67	12.67	13.21	12.86	12.53	14.21	14.85	16.74	18.04	18.43	17.62
E12000007	London	E09000014	Haringey	4.32	4.98	5.43	6.45	7.13	7.74	8.48	8.84	9.08	8.55	9.51	9.04	8.77	9.46	10.79	10.65	11.14	12.70	14.02	15.46	16.81	17.46	17.01
E12000007	London	E09000012	Hackney	3.39	3.41	4.45	5.36	6.37	7.12	7.71	8.77	7.61	7.97	8.62	8.63	8.03	8.39	8.80	9.19	11.12	12.68	14.60	16.57	15.77	15.59	16.56
E12000008	South East	E07000208	Epsom and Ewell	5.44	6.11	6.12	8.53	8.25	8.84	9.60	10.24	10.19	10.60	11.08	10.20	8.64	10.18	10.77	9.95	11.46	14.60	14.91	16.16	17.86	16.75	16.38
E12000007	London	E09000003	Barnet	5.45	6.10	6.59	6.98	8.13	8.48	9.44	9.79	9.25	10.16	10.57	10.29	9.18	10.57	10.81	10.98	11.41	12.52	14.24	14.41	15.93	17.21	16.30
E12000006	East of England	E07000240	St Albans	:	:	:	:	:	10.53	10.28	10.37	10.52	11.09	11.14	10.05	12.36	12.69	12.47	13.92	13.62	15.01	16.98	16.59	16.82	16.09	
E12000008	South East	E07000207	Elmbridge	6.44	6.99	7.73	8.12	9.56	9.66	9.99	10.89	9.56	11.21	11.00	12.35	12.15	12.73	12.42	12.56	13.31	14.28	14.81	15.27	16.53	15.83	15.88
E12000008	South East	E07000216	Waverley	5.99	7.00	6.61	8.08	8.49	9.44	10.19	11.33	10.66	11.30	10.05	11.67	10.29	12.63	12.87	12.57	13.07	13.62	14.97	14.84	14.47	16.21	15.77
E12000007	London	E09000005	Brent	4.59	4.92	5.72	5.95	7.04	8.38	8.99	9.54	9.71	9.83	10.64	10.36	9.82	10.77	11.21	11.50	12.13	12.70	13.34	14.66	15.76	16.30	15.71
E12000008	South East	E07000006	South Bucks	7.09	8.61	7.41	8.50	9.85	9.84	10.88	9.86	11.01	11.45	12.40	11.87	10.77	13.97	15.06	12.37	12.28	16.71	16.76	18.35	15.85	18.05	15.56
E12000007	London	E09000009	Ealing	4.53	5.00	5.69	6.31	6.70	7.40	8.62	8.51	8.70	9.22	9.46	9.51	8.85	9.57	9.98	9.74	10.93	12.84	14.48	15.73	16.19	15.64	15.31
E12000007	London	E09000021	Kingston upon Thames	4.83	5.39	6.27	7.05	7.70	8.41	9.03	9.70	9.62	9.61	10.27	11.02	9.64	10.45	10.35	10.70	11.21	12.15	13.97	14.64	15.49	15.79	15.25
E12000008	South East	E07000215	Tandridge	6.48	6.82	7.45	8.59	8.32	9.64	10.65	11.84	11.61	11.40	11.07	11.65	11.02	11.48	12.96	14.06	14.05	13.63	14.90	14.86	14.10	15.64	14.98
E12000007	London	E09000001	City of London	4.61	5.50	5.45	5.50	6.01	6.04	6.88	6.46	6.78	6.98	7.91	7.47	7.32	8.66	8.37	8.78	10.61	12.79	15.25	14.42	15.10	14.56	14.90
E12000007	London	E09000024	Merton	4.80	5.23	6.06	7.16	7.28	7.98	8.71	9.48	8.85	9.65	9.49	9.47	8.93	10.29	10.51	10.10	10.92	13.62	13.20	16.19	15.43	15.39	14.83
E12000007	London	E09000026	Redbridge	4.07	4.60	4.75	5.63	6.25	7.18	8.13	9.47	8.35	8.34	8.50	8.54	7.38	8.08	8.38	9.34	8.68	9.32	11.68	13.46	14.22	15.74	14.77
E12000007	London	E09000019	Islington	5.18	6.13	6.37	7.33	7.59	7.02	8.52	8.22	8.79	8.38	9.63	9.76	9.19	10.77	11.25	11.05	11.92	13.61	15.70	15.17	15.67	14.73	14.61
E12000007	London	E09000031	Waltham Forest	3.48	3.68	4.15	4.63	5.30	6.42	7.30	7.75	9.01	8.97	9.25	9.02	7.59	8.11	8.21	8.81	8.79	11.33	12.26	14.81	15.64	14.85	14.54
E12000007	London	E09000022	Lambeth	3.92	4.26	4.97	6.11	7.08	7.53	7.79	8.00	7.94	8.09	8.81	9.16	7.93	8.90	8.76	9.07	9.61	11.80	12.91	14.42	14.70	14.50	14.53
E12000007	London	E09000010	Enfield	4.25	4.31	4.67	4.85	5.18	5.88	7.79	6.89	8.13	8.26	8.62	9.24	8.09	8.71	9.09	9.03	9.69	10.85	12.20	12.97	13.82	13.68	14.51
E12000007	London	E09000015	Harrow	4.86	5.01	5.68	6.43	6.97	8.07	9.87	9.70	9.52	9.78	10.53	10.28	9.08	10.14	10.75	11.22	12.22	13.63	14.46	14.73	16.00	15.62	14.17
E12000006	East of England	E07000098	Hertsmere	5.04	5.22	5.95	6.15	6.56	7.78	9.02	8.95	9.30	9.73	10.37	10.16	8.50	8.51	10.87	9.63	10.17	12.51	12.67	13.98	14.21	14.26	14.06
E12000008	South East	E06000040	Windsor and Maidenhead	6.07	7.21	6.97	7.99	8.16	8.53	8.99	9.10	9.11	9.03	9.96	9.48	9.05	10.00	10.10	9.98	9.93	11.23	12.10	13.64	13.79	13.17	13.91
E12000007	London	E09000028	Southwark	3.82	4.40	5.05	5.83	6.49	6.70	6.82	7.43	8.02	7.68	8.38	9.13	8.26	8.70	8.94	9.01	9.53	11.56	12.69	13.46	14.19	13.89	13.89
E12000007	London	E09000011	Greenwich	3.41	3.63	3.96	4.70	5.73	6.52	7.00	6.99	7.42	7.58	7.47	7.61	7.30	7.54	8.35	8.14	8.72	10.71	10.89	12.76	12.87	12.97	13.83
E12000007	London	E09000006	Bromley	5.75	5.94	6.67	7.93	9.43	10.22	10.45	10.38	9.49	9.33	9.74	9.55	9.16	9.74	9.76	9.79	10.22	11.64	11.99	13.24	14.59	14.30	13.77
E12000006	East of England	E07000072	Epping Forest	5.62	5.61	6.46	6.65	7.17	9.42	10.25	10.48	9.55	9.61	9.92	9.17	8.57	10.94	10.41	10.06	11.33	11.43	12.93	14.11	14.50	14.42	13.68
E12000006	East of England	E07000102	Three Rivers	5.28	5.05	5.42	6.32	6.68	6.73	6.94	7.56	7.47	7.33	7.65	7.52	7.62	8.73	9.31	10.01	10.28	11.29	13.15	13.42	13.79	13.67	13.67
E12000008	South East	E07000210	Mole Valley	5.71	6.30	6.75	8.27	8.45	8.76	8.13	8.57	9.16	8.96	9.84	10.39	8.33	9.64	9.59	9.62	10.53	11.07	12.30	13.96	14.37	14.57	13.55
E12000006	East of England	E07000077	Uttlesford	5.31	5.66	5.77	7.01	7.49	8.21	8.55	10.68	10.76	10.60	9.87	10.23	9.64	9.73	10.03	10.70	11.22	11.52	12.35	12.37	13.52	13.74	13.54
E12000009	South West	E07000079	Cotswold	5.63	5.86	6.67	7.98	6.79	8.76	10.36	10.76	11.74	11.83	11.14	12.33	11.66	13.47	12.53	11.33	12.06	12.48	12.14	13.20	14.00	13.34	13.47
E12000008	South East	E07000085	East Hampshire	5.02	5.31	6.08	6.62	7.19	7.47	9.87	10.79	9.92	10.27	10.52	11.02	10.26	9.90	10.27	10.51	11.41	11.80	11.55	12.86	12.22	12.59	13.41
E12000007	London	E09000023	Lewisham	3.38	3.51	3.79	4.25	5.37	5.93	7.14	6.97	6.60	7.40	7.86	7.82	6.96	7.40	8.02	8.17	8.20	10.00	11.25	12.02	12.61	13.68	13.38
E12000008	South East	E07000094	Winchester	5.62	6.31	6.49	7.45	7.91	8.40	8.64	9.97	9.92	9.79	10.11	9.78	8.75	9.86	11.03	9.90	9.93	10.27	11.03	11.96	12.15	12.22	13.28
E12000008	South East	E07000225	Chichester	5.11																						

E12000008	South East	E06000041	Wokingham	5.00	5.40	5.85	6.51	6.02	6.18	7.34	7.61	8.19	8.11	7.94	8.09	7.25	7.48	7.70	7.14	8.05	8.50	9.95	10.57	12.17	11.15	11.19
E12000008	South East	E07000091	New Forest	4.85	4.91	5.51	6.05	6.75	7.94	9.37	9.95	11.00	10.46	10.56	10.51	9.37	10.04	10.01	9.81	9.92	9.51	10.56	11.19	11.90	11.51	11.18
E12000008	South East	E07000214	Surrey Heath	4.56	5.67	5.64	6.21	6.20	6.84	7.70	8.34	8.50	8.58	9.25	8.77	8.00	9.51	9.36	9.41	9.34	9.64	10.89	12.33	13.09	13.06	11.17
E12000007	London	E09000008	Croydon	3.80	4.09	4.34	4.80	5.91	6.31	7.37	7.51	7.85	7.68	8.47	8.37	7.26	7.52	7.59	7.80	7.60	8.02	9.63	10.51	11.21	11.09	11.07
E12000007	London	E09000002	Barking and Dagenham	3.02	2.58	2.93	3.32	3.85	4.31	5.41	5.97	6.11	6.21	5.96	6.50	5.28	5.85	6.03	5.19	5.54	6.27	7.12	8.94	10.58	10.17	11.03
E12000009	South West	E07000187	Mendip	3.89	3.96	4.24	4.85	5.33	6.37	7.44	8.49	8.36	8.28	8.62	9.06	8.05	7.90	7.62	8.01	8.02	9.00	9.82	10.58	10.29	10.98	10.98
E12000006	East of England	E07000200	Babergh	4.21	4.11	4.45	4.77	5.10	7.10	7.89	8.17	8.59	8.15	8.30	8.86	7.47	8.63	8.02	8.30	8.91	9.22	9.48	11.26	10.74	11.48	10.95
E12000008	South East	E07000229	Worthing	3.40	3.86	3.86	4.47	4.92	6.30	7.22	7.27	8.19	8.08	8.73	8.48	7.51	8.10	7.92	7.76	8.25	8.78	9.45	10.80	11.36	11.73	10.89
E12000008	South East	E07000213	Spelthorne	4.62	4.54	4.89	5.38	6.23	6.22	6.71	6.49	6.72	7.89	8.46	7.92	7.45	8.23	7.62	7.57	8.13	8.06	8.83	10.88	11.08	11.80	10.86
E12000004	East Midlands	E07000131	Harborough	4.13	4.37	4.60	5.31	5.56	6.27	8.30	8.46	8.20	8.75	8.80	8.04	6.83	7.74	7.55	7.84	7.52	8.04	8.91	9.00	9.66	10.14	10.81
E12000006	East of England	E07000069	Castle Point	4.29	3.77	4.23	4.92	5.17	7.43	8.98	9.88	8.25	8.52	10.11	9.21	8.45	10.04	10.19	9.14	9.55	9.77	11.21	11.12	11.56	10.66	10.72
E12000008	South East	E07000106	Canterbury	4.17	4.45	4.76	5.17	5.77	6.98	7.40	7.87	8.12	8.43	9.05	8.58	7.37	8.50	7.53	7.89	8.10	8.85	9.49	10.62	11.12	10.96	10.65
E12000007	London	E09000030	Tower Hamlets	3.80	4.25	5.04	5.52	5.76	6.34	6.09	5.82	6.08	6.29	6.69	7.16	6.37	6.86	6.53	6.73	6.79	7.76	8.77	10.06	9.82	9.85	10.63
E12000009	South West	E07000047	West Devon	4.96	4.78	5.19	5.63	5.90	7.33	8.84	10.29	10.46	12.13	12.53	11.18	11.13	9.19	9.32	9.54	8.78	9.48	9.69	10.10	9.73	10.61	
E12000006	East of England	E06000033	Southend-on-Sea	3.34	3.62	3.70	3.88	4.20	5.04	6.39	7.04	7.73	7.95	7.95	7.86	7.48	7.49	7.44	7.49	7.45	7.52	8.93	9.03	10.30	10.32	10.60
E12000008	South East	E07000089	Hart	4.87	5.82	5.94	5.57	6.69	6.94	7.84	7.72	9.03	8.22	8.93	9.58	7.57	8.23	9.32	8.45	9.36	10.26	10.92	12.00	11.83	12.26	10.58
E12000009	South West	E07000045	Teignbridge	4.77	5.05	4.97	5.08	5.61	7.15	7.75	8.90	9.17	9.14	9.90	9.27	8.40	8.70	8.80	8.76	8.56	8.85	9.40	9.94	10.89	10.55	10.51
E12000006	East of England	E07000241	Welwyn Hatfield							6.73	7.67	6.60	7.18	7.18	7.38	7.44	7.87	9.17	8.10	8.74	8.81	9.74	11.08	11.23	10.98	10.50
E12000009	South West	E07000040	East Devon	5.21	5.01	5.38	6.00	6.41	7.59	9.59	9.61	10.46	10.24	11.06	10.63	9.68	11.08	10.89	10.53	9.99	10.05	10.34	9.39	9.84	9.93	10.47
E12000008	South East	E07000177	Cherwell	3.89	3.95	4.64	4.91	6.67	6.23	7.02	7.54	7.64	8.47	8.78	8.53	7.22	7.43	7.81	7.81	8.46	8.86	8.92	9.35	9.82	9.77	10.43
E12000008	South East	E07000110	Maidstone	4.59	4.92	4.92	5.55	6.31	6.70	7.71	8.38	8.70	8.68	9.56	8.62	7.43	8.05	8.02	8.19	8.94	9.44	9.05	10.11	10.30	11.24	10.40
E12000006	East of England	E07000075	Rochford	4.56	4.95	4.59	5.08	6.55	7.32	9.10	8.58	8.96	8.54	8.84	9.60	7.83	9.51	9.47	9.52	8.99	9.63	9.71	12.31	11.91	11.92	10.39
E12000008	South East	E07000217	Woking	5.22	4.57	5.05	6.09	6.37	7.06	7.21	7.59	7.85	7.75	8.76	8.41	9.49	9.47	10.44	9.96	10.78	12.22	13.24	11.61	12.24	11.85	10.39
E12000008	South East	E07000181	West Oxfordshire	5.12	5.00	5.17	6.63	6.25	7.06	8.34	7.97	8.54	9.22	9.74	9.35	8.26	8.91	9.09	8.98	9.36	9.06	9.95	11.60	11.24	11.55	10.38
E12000008	South East	E07000004	Aylesbury Vale	4.48	4.84	5.22	5.48	6.42	7.03	7.25	8.36	7.79	8.08	8.80	8.68	7.57	8.56	8.48	8.27	8.54	9.77	10.70	10.89	11.10	11.16	10.37
E12000006	East of England	E06000056	Central Bedfordshire							6.24	7.11	7.27	7.30	7.95	7.37	7.22	7.97	8.37	7.85	7.75	8.60	9.51	10.44	10.57	10.88	10.36
E12000006	East of England	E07000067	Braintree	4.20	4.58	4.89	5.38	5.43	6.22	7.23	7.73	7.48	7.46	7.51	8.10	7.30	7.62	7.43	7.51	7.17	7.93	8.23	8.59	9.50	10.26	10.25
E12000006	East of England	E07000009	East Cambridgeshire	3.91	5.08	5.66	4.96	6.22	6.68	7.36	7.47	8.44	8.15	8.00	8.16	7.20	7.72	7.92	7.95	7.53	8.46	8.92	9.49	9.86	10.66	10.24
E12000009	South West	E07000043	North Devon	4.37	4.50	4.99	5.44	6.24	7.62	8.30	9.45	10.52	10.63	11.08	10.09	9.44	9.46	9.11	9.08	8.74	9.22	9.59	9.76	10.02	9.85	10.24
E12000006	East of England	E07000099	North Hertfordshire	4.06	4.26	4.54	5.06	5.95	6.01	7.37	7.80	7.67	8.01	8.87	8.38	7.32	7.76	8.30	8.16	8.07	8.53	8.99	10.49	10.31	10.83	10.21
E12000009	South West	E06000022	Bath and North East Somerset	4.65	4.52	4.85	5.34	6.38	6.90	7.68	8.34	8.93	8.72	9.20	9.49	8.21	8.86	9.13	9.13	8.90	9.48	9.98	10.58	11.11	10.85	10.16
E12000009	South West	E06000059	Dorset							8.85	9.67	9.93	10.07	10.79	10.70	9.32	10.16	9.96	9.67	9.38	9.58	10.00	10.53	10.97	10.49	10.06
E12000005	West Midlands	E07000234	Bromsgrove	4.64	4.73	4.99	6.21	6.64	8.56	8.36	9.43	9.57	9.57	10.38	9.61	8.37	8.94	9.86	9.05	9.25	9.79	10.33	10.39	10.33	10.58	10.05
E12000004	East Midlands	E07000155	South Northamptonshire	4.92	5.38	5.04	6.12	6.43	6.76	7.07	7.77	8.53	8.18	8.50	7.98	7.92	8.12	7.82	9.11	8.46	8.55	9.83	10.72	10.30	10.62	9.99
E12000008	South East	E07000090	Havant	4.05	4.57	4.67	4.96	5.30	6.68	7.01	8.25	8.29	7.82	8.42	8.59	7.23	7.67	6.95	6.77	6.74	8.32	8.11	8.87	9.25	9.50	9.95
E12000008	South East	E07000093	Test Valley	4.93	5.25	5.53	6.20	7.00	6.96	8.31	8.62	8.61	9.22	9.50	9.45	8.22	8.94	8.76	8.49	8.52	8.65	9.02	10.06	10.30	10.12	9.95
E12000008	South East	E07000086	Eastleigh	4.23	4.42	4.82	5.40	6.06	7.11	7.76	8.34	8.04	8.25	8.85	9.18	7.69	7.54	7.95	8.14	8.20	8.16	8.47	9.19	9.62	10.44	9.94
E12000008	South East	E07000212	Runnymede	4.08	5.27	5.78	6.26	6.41	6.41	7.83	8.19	8.11	7.66	8.52	8.22	7.40	7.45	8.14	7.35	7.73	8.43	9.22	10.49	10.78	10.91	9.85
E12000006	East of England	E07000147	North Norfolk	4.03	4.09	4.39	4.69	5.27	6.23	7.36	8.06	8.94	9.70	9.80	9.50	8.49	8.41	8.13	8.22	8.59	9.14	8.27	8.68	9.60	9.78	9.84
E12000006	East of England	E07000012	South Cambridgeshire	4.53	4.77	5.48	5.69	6.12	6.24	6.94	8.06	7.57	7.34	7.87	7.71	6.67	7.17	7.82	7.42	7.74	7.80	9.15	10.26	10.98	10.33	9.78
E12000009	South West	E06000024	North Somerset	3.66	4.00	4.04	4.48	4.86	5.42	6.12	6.87	7.24	7.43	7.67	7.43	6.93	7.21	7.01	6.78	6.84	7.26	8.13	8.35	8.98	9.65	9.76
E12000004	East Midlands	E07000035	Derbyshire Dales	4.66	4.90	4.84	4.58	5.05	6.43	6.62	8.61	9.41	9.13	9.92	8.56	8.22	8.87	8.59	8.13	8.61	8.55	9.07	8.99	9.35	9.21	9.66
E12000009	South West	E06000054	Wiltshire							7.76	8.12	8.51	8.57	8.63	8.41	7.66	8.29	8.30	8.44	8.10	8.35	8.83	9.55	9.51	9.80	9.63
E12000005	West Midlands	E07000238	Wychavon	4.65	4.79	5.02	5.55	6.37	7.19	8.48	9.33	9.10	9.67	10.19	10.36	8.13	8.64	8.46	8.24	8.08	8.61	8.86	9.35	9.47	9.78	9.61
E12000006	East of England	E06000034	Thurrock	2.89	3.22	3.24	3.38	4.12	4.32	5.48	5.90	6.58	6.97	7.30	7.08	6.57	6.54	6.67	6.63	6.57	7.61	8.32	9.85	10.00	10.04	9.60
E12000008	South East	E07000114	Thanet	3.42	3.48	3.68	3.74	4.64	5.04	6.54	7.18	7.78	8.00	8.00	7.79	7.46	8.37	7.32	7.66	7.42	8.18	8.52	9.53	10.49	10.49	9.59
E12000002	North West	E08000009	Trafford	3.72	3.68	3.85	4.15	4.40	5.35	5.85	6.75	7.16	7.27	7.42	7.05	6.35	6.90	6.89	6.71	7.40	7.58	8.16	8.56	8.94	9.29	9.58
E12000008	South East	E07000180	Vale of White Horse	4.35	4.76	4.96	5.71	5.99	6.90	7.55	7.64	7.89	8.30	7.76	8.35	7.26	8.03	7.16	7.56	7.50	8.43	8.72	9.28	8.97	9.87	9.57
E12000006	East of England	E07000071	Colchester	3.65	3.84	4.05	4.24	4.72	5.77	6.55	7.62	7.47	7.45	8.01	7.63											

E12000008	South East	E06000039	Slough	3.02	3.48		3.75	3.77	4.44	4.82	5.41	6.00	6.45	6.46	6.76	6.80	5.61	6.01	5.97	6.31	6.25	7.30	8.15	8.82	9.83	9.58	8.94
E12000003	Yorkshire and The Humber	E07000167	Ryedale	4.87	4.28		4.44	4.78	5.61	6.02	7.58	9.50	10.89	10.08	10.32	9.85	8.31	9.03	8.79	8.98	8.64	8.61	8.44	8.96	8.98	9.36	8.91
E12000009	South West	E06000023	Bristol, City of	3.03	3.24		3.51	3.87	4.33	5.06	6.19	6.41	6.49	6.77	7.00	6.96	6.12	6.22	6.37	6.54	6.23	6.73	7.34	8.22	9.04	8.69	8.77
E12000009	South West	E06000025	South Gloucestershire	3.32	3.44		3.65	4.24	4.39	4.97	5.59	6.00	6.33	6.20	7.15	7.06	6.05	6.84	6.62	6.93	6.95	7.04	7.45	8.29	8.00	8.19	8.77
E12000004	East Midlands	E07000135	Oadby and Wigston	3.51	3.76		3.73	4.11	4.62	4.71	5.91	6.44	6.92	6.52	7.50	7.70	6.51	7.17	7.53	6.69	6.73	6.94	7.41	7.70	7.82	8.16	8.74
W92000004	Wales	W06000021	Monmouthshire	4.15	4.72		4.62	5.30	5.93	6.97	6.75	7.97	8.44	8.75	9.63	8.63	7.84	8.10	8.09	8.50	7.88	8.17	8.92	8.51	8.42	8.66	8.74
E12000006	East of England	E07000076	Tendring	3.26	3.34		3.66	4.08	5.30	5.57	6.62	7.28	8.00	8.42	9.08	8.96	7.49	7.07	7.45	6.84	6.69	6.42	6.87	7.99	9.08	9.00	8.72
E12000009	South West	E07000078	Cheltenham	3.68	3.96		4.21	4.71	5.17	5.81	6.49	7.51	7.60	7.69	7.53	7.42	6.37	7.34	7.46	7.04	7.19	7.84	8.38	8.84	8.99	8.98	8.72
E12000009	South West	E07000082	Stroud	3.72	3.84		4.47	4.84	5.72	6.22	7.47	8.11	7.69	8.34	8.82	7.87	7.10	7.72	7.74	7.00	6.97	7.88	7.83	8.21	8.79	9.00	8.68
E12000006	East of England	E07000143	Breckland	3.39	3.49		3.62	4.06	4.33	5.24	7.03	7.62	7.38	7.50	8.06	7.59	6.98	7.33	6.95	6.33	6.99	7.51	8.15	8.07	9.33	9.10	8.65
E12000008	South East	E07000109	Gravesham	3.40	3.93		3.99	4.39	5.32	5.83	6.46	6.99	6.66	7.31	6.78	6.21	6.34	6.38	5.80	6.46	6.52	6.77	7.44	8.52	9.26	9.75	8.62
E12000004	East Midlands	E07000133	Melton	3.13	3.58		4.20	3.96	4.06	5.62	6.23	6.56	7.45	7.02	7.86	6.88	6.70	7.13	7.17	6.93	7.23	7.93	7.46	7.54	7.73	8.35	8.61
E12000008	South East	E06000046	Isle of Wight	3.51	3.53		3.85	4.12	4.43	5.99	6.29	7.86	7.62	8.03	7.97	7.74	6.89	7.88	7.10	6.83	7.32	7.50	7.76	7.58	8.19	8.23	8.56
E12000005	West Midlands	E07000236	Redditch	3.43	3.73		4.11	4.44	4.63	5.07	6.26	7.03	7.16	7.24	7.57	6.87	5.68	6.34	6.36	6.39	6.39	6.60	7.32	7.15	7.69	8.25	8.48
E12000009	South West	E07000041	Exeter	3.25	3.29		3.35	3.77	4.11	5.20	6.45	7.09	7.20	7.60	8.22	7.92	7.06	7.20	7.17	7.22	6.97	7.29	8.08	7.69	8.55	8.70	8.45
E12000008	South East	E07000084	Basingstoke and Deane	3.94	4.21		4.55	5.49	5.47	5.66	6.50	6.64	7.33	6.69	7.13	6.71	6.34	6.85	6.91	7.60	7.10	7.62	7.96	8.22	9.55	9.57	8.44
E12000004	East Midlands	E07000141	South Kesteven	3.61	3.86		4.15	4.27	4.67	5.15	6.89	7.55	8.46	7.86	8.14	7.90	6.30	7.04	6.91	6.95	6.70	7.76	7.69	8.42	8.76	9.02	8.42
E12000005	West Midlands	E08000029	Solihull	4.15	4.18		4.45	4.92	5.33	5.83	6.73	7.06	7.37	7.38	7.26	6.72	6.24	7.22	7.34	6.76	6.87	7.16	7.66	7.55	7.74	7.62	8.42
E12000008	South East	E06000035	Medway	:	2.95	:	3.14	3.45	3.91	4.66	5.53	6.31	6.33	6.30	6.60	6.47	5.34	5.74	5.66	5.73	6.24	6.30	6.90	7.93	8.28	8.67	8.41
E12000005	West Midlands	E07000199	Tamworth	3.42	3.19		3.55	3.62	4.35	4.57	4.84	6.21	6.01	6.30	6.68	6.09	6.04	6.47	6.18	5.83	6.15	6.19	6.45	6.85	6.99	7.72	8.31
E12000008	South East	E06000042	Milton Keynes	3.16	3.26		3.57	3.93	4.48	5.18	5.83	6.38	6.73	6.84	6.73	6.77	5.84	6.60	6.60	6.55	6.61	6.84	7.74	7.63	8.66	8.79	8.31
E12000008	South East	E07000108	Dover	3.15	3.23		3.35	3.63	4.03	4.38	5.47	6.60	5.69	6.10	7.49	6.84	5.60	6.26	5.99	6.03	6.32	7.24	7.29	7.85	8.30	9.37	8.22
E12000003	Yorkshire and The Humber	E06000014	York	3.71	3.56		3.64	3.72	4.27	4.99	6.22	6.50	6.94	7.32	7.11	7.16	6.48	7.11	7.01	6.74	6.52	7.34	8.20	8.30	8.60	8.87	8.21
E12000005	West Midlands	E07000196	South Staffordshire	4.10	3.94		4.24	4.42	5.23	6.21	7.51	6.94	7.34	7.04	8.11	7.56	7.07	7.35	7.59	7.88	6.86	7.39	7.41	7.78	7.77	7.39	8.17
E12000008	South East	E07000061	Eastbourne	3.29	3.49		3.72	4.52	4.88	5.61	6.84	7.51	7.24	7.60	7.33	7.24	6.48	7.17	6.96	7.62	7.19	6.77	7.25	8.73	8.78	8.23	8.17
E12000004	East Midlands	E07000129	Blaby	3.11	3.26		3.94	3.65	3.92	4.42	5.66	5.93	6.26	6.49	6.62	6.25	5.34	5.60	5.82	6.23	6.59	6.53	6.97	7.48	7.69	7.72	8.13
E12000006	East of England	E07000010	Fenland	2.75	2.79		2.97	3.24	3.61	4.85	5.27	5.78	6.53	6.18	6.41	6.67	5.49	6.64	5.67	5.49	5.57	5.76	6.13	6.49	7.12	8.48	8.10
E12000004	East Midlands	E07000175	Newark and Sherwood	3.42	3.54		4.15	4.06	4.01	4.14	6.05	6.74	7.10	6.48	6.82	6.50	6.11	7.00	6.29	6.35	6.15	6.49	6.71	6.73	7.28	7.77	8.09
E12000008	South East	E07000092	Rushmoor	3.56	3.79		4.24	4.86	4.68	5.07	5.30	5.75	6.33	5.97	5.84	6.06	5.05	5.62	5.84	6.16	6.26	6.96	7.70	9.42	9.19	8.18	8.08
E12000009	South West	E07000083	Tewkesbury	3.84	3.97		3.67	4.16	4.90	5.26	6.33	7.16	7.02	7.74	7.59	7.57	6.54	6.89	7.02	7.42	7.11	8.23	8.22	7.98	7.92	8.65	8.07
E12000009	South West	E06000027	Torbay	3.91	4.57		4.30	4.62	4.96	6.12	7.88	8.76	8.90	8.75	8.78	8.67	8.39	8.34	7.25	7.37	7.35	8.03	7.86	8.17	7.71	8.84	7.99
E12000005	West Midlands	E06000051	Shropshire	:	:	:	:	:	:	:	6.76	7.73	8.13	8.50	8.41	8.73	8.07	7.79	7.61	7.68	7.22	7.54	7.62	7.81	8.52	8.11	7.97
E12000002	North West	E06000049	Cheshire East	:	:	:	:	:	:	:	6.03	6.68	6.80	7.04	6.99	7.05	6.75	7.40	6.80	6.83	6.82	7.14	7.40	7.43	7.65	8.05	7.95
E12000004	East Midlands	E07000156	Wellingborough	2.88	2.91		3.25	3.21	3.64	4.43	4.63	5.64	6.21	6.09	6.54	6.63	5.85	6.33	5.50	5.79	6.18	6.25	7.26	7.27	7.49	7.43	7.95
E12000004	East Midlands	E07000152	East Northamptonshire	3.15	3.50		3.41	3.64	4.15	4.94	6.59	7.87	7.15	7.23	6.80	7.05	6.58	7.52	6.83	6.32	5.73	6.71	6.81	7.92	8.29	8.59	7.92
E12000009	South West	E07000246	Somerset West and Taunton	:	:	:	:	:	:	:	7.36	7.82	8.16	7.77	7.99	8.15	7.17	7.55	8.04	7.68	7.36	7.47	7.43	7.98	8.33	8.45	7.92
E12000002	North West	E07000030	Eden	4.30	4.84		4.95	5.29	5.22	4.94	6.78	9.53	8.12	8.15	9.22	8.54	8.87	8.85	8.26	7.26	6.46	7.54	7.68	7.80	7.49	8.58	7.86
W92000004	Wales	W06000014	Vale of Glamorgan	3.49	3.67		3.97	3.87	3.69	4.14	5.16	6.01	6.08	6.58	6.31	6.45	6.37	6.27	6.18	6.28	7.23	8.16	7.74	7.97	8.33	8.66	7.86
E12000006	East of England	E07000244	East Suffolk	:	:	:	:	:	:	:	5.78	6.35	6.77	6.87	7.09	6.83	6.28	6.86	6.58	7.08	6.81	6.79	7.60	7.69	8.26	8.70	7.85
E12000002	North West	E08000007	Stockport	3.57	3.46		3.77	3.88	4.06	4.42	5.39	6.13	6.36	6.58	6.64	6.71	5.90	6.39	5.99	5.88	5.89	6.71	6.87	7.21	7.55	7.99	7.74
E12000005	West Midlands	E07000220	Rugby	3.19	3.13		3.12	3.82	3.58	5.05	5.20	5.79	6.04	6.57	6.33	6.06	5.52	5.74	5.68	5.79	5.84	5.87	6.15	6.50	6.74	7.73	7.65
E12000009	South West	E060000030	Swindon	3.02	3.30		3.58	3.99	4.40	5.17	5.63	5.78	5.98	6.10	6.09	5.91	5.17	5.80	5.62	5.55	5.57	5.70	5.89	6.47	7.09	7.60	7.64
E12000003	Yorkshire and The Humber	E07000163	Craven	4.76	4.27		4.35	4.29	4.53	4.96	6.04	7.11	7.70	10.10	8.81	7.35	7.68	7.91	8.05	7.79	7.28	7.24	8.12	7.71	7.93	7.49	7.62
E12000004	East Midlands	E07000130	Charnwood	3.19	3.29		3.49	3.39	3.64	4.10	5.40	6.15	6.34	6.18	6.58	6.22	5.41	5.80	5.86	6.02	6.06	6.33	6.71	6.73	7.30	7.20	7.62
E12000006	East of England	E07000243	Stevenage	:	:	:	:	:	:	:	5.09	5.32	6.09	5.88	6.40	6.51	5.61	5.71	5.46	5.24	5.73	5.94	6.67	7.43	7.61	8.20	7.61
E12000006	East of England	E06000032	Luton	2.51	2.58		2.65	3.31	3.87	4.12	5.18	5.86	5.80	6.51	6.05	5.33	5.70	5.71	6.08	5.93	6.40	6.34	7.31	7.36	8.32	7.57	
E12000004	East Midlands	E07000139	North Kesteven	3.48	3.41		3.88	3.99	4.47	5.36	7.35	7.25	7.96	8.01	7.50	8.06	7.05	6.86	7.11	6.80	6.59	6.61	7.25	7.53	7.46	7.39	7.56
E12000009	South West	E07000189	South Somerset	3.34	3.54		3.97	4.39	4.39	5.37	6.54	7.76	7.74	7.83	8.32	8.22	7.37	7.83	7.22	7.00	7.01	7.19	7.75	7.93	8.19	8.19	7.54
E12000008	South East	E07000088	Gosport	3.49	3.28		3.74	4.14	4.63	5.13	5.79	6.29	6.51	6.35	6.28	6.99	5.85	6.36	5.61	6.59	6.01	5.56					

W9200004	Wales	W0600001	Isle of Anglesey	2.71	3.01	3.18	3.37	3.47	4.21	4.58	5.87	6.32	6.88	7.95	7.03	5.97	6.63	6.99	6.11	6.05	5.86	5.80	6.33	6.76	6.95	6.77
E1200006	East of England	E06000031	Peterborough		2.74	2.91	3.05	3.28	3.85	4.37	5.54	5.53	5.70	6.03	5.81	5.25	5.48	5.19	5.01	5.07	5.54	5.76	5.93	6.67	6.82	6.76
E1200003	Yorkshire and The Humber	E07000169	Selby	3.46	3.44	3.49	3.75	3.57	4.04	5.62	6.13	6.84	6.94	7.15	6.00	5.40	5.70	5.76	5.98	5.93	5.73	5.97	6.42	6.77	6.68	6.72
E1200005	West Midlands	E07000192	Cannock Chase	3.08	2.93	3.23	3.06	3.52	3.86	4.72	5.70	6.02	6.27	6.43	5.50	5.54	5.56	5.67	5.61	5.07	5.60	5.65	6.05	6.31	6.35	6.71
E1200002	North West	E07000026	Allerdale	3.17	3.27	3.40	3.48	3.30	3.60	4.31	5.48	5.72	6.44	6.77	6.48	6.01	6.29	6.61	6.49	6.24	6.23	6.57	6.02	6.47	6.65	6.69
E12000002	North West	E06000007	Warrington	3.33	3.45	3.61	3.60	3.75	4.50	4.93	6.43	6.37	6.69	5.83	5.46	5.19	5.66	5.53	5.40	5.77	5.71	5.99	6.14	6.35	6.31	6.67
W9200004	Wales	W06000002	Gwynedd	3.12	2.88	3.25	3.54	3.45	3.63	4.72	5.67	6.64	6.97	7.08	7.16	6.51	6.23	6.37	6.28	6.20	6.26	6.91	6.98	6.56	6.41	6.63
E1200002	North West	E07000127	West Lancashire	3.28	3.55	3.88	3.76	4.12	4.53	5.54	6.34	6.32	7.03	7.15	7.27	6.85	6.91	6.49	6.78	6.96	7.16	6.47	6.47	6.51	6.54	6.61
E12000004	East Midlands	E07000137	East Lindsey	3.43	3.45	3.55	3.75	3.99	4.65	5.73	7.31	7.61	7.69	8.17	7.29	6.07	6.61	6.51	6.13	5.63	5.77	6.06	5.91	6.46	6.48	6.60
E12000002	North West	E08000014	Sefton	3.70	3.72	3.74	3.80	3.95	4.49	5.06	6.17	6.33	7.06	6.91	6.51	6.86	6.66	6.54	5.99	5.80	6.25	6.19	6.61	6.56	6.49	6.59
E12000005	West Midlands	E07000193	East Staffordshire	3.02	3.33	3.73	3.34	3.49	3.93	4.63	5.27	5.87	5.89	6.46	5.85	5.79	6.39	5.49	5.35	5.19	5.62	5.99	5.64	6.40	6.63	6.58
E12000001	North East	E06000057	Northumberland							4.72	5.96	6.45	6.51	6.75	6.93	6.05	6.30	6.36	5.87	6.04	6.53	6.50	6.26	6.42	6.59	6.50
E12000003	Yorkshire and The Humber	E06000011	East Riding of Yorkshire	3.32	3.28	3.47	3.27	3.40	3.95	4.75	6.05	6.23	6.10	6.09	6.29	5.64	5.88	5.95	5.86	5.65	6.11	6.37	6.51	6.61	6.65	6.50
E12000009	South West	E06000026	Plymouth	3.02	3.11	2.98	2.90	3.19	4.13	4.43	5.52	6.14	6.13	6.62	5.89	5.57	5.80	5.47	5.40	5.34	5.69	5.90	6.26	6.05	6.11	6.46
E12000004	East Midlands	E07000142	West Lindsey	3.91	3.45	3.62	3.25	3.78	4.06	4.98	6.60	6.37	6.43	7.79	7.10	6.07	6.22	6.20	5.90	5.70	6.57	6.49	5.78	5.99	6.37	6.43
E12000005	West Midlands	E08000027	Dudley	3.62	3.35	3.58	3.63	3.79	4.19	4.98	5.92	6.33	6.51	6.50	6.28	5.92	6.34	5.79	5.85	6.08	6.09	5.96	5.95	6.08	6.22	6.38
E12000004	East Midlands	E07000171	Bassetlaw	2.85	2.82	3.19	3.33	3.32	3.92	4.29	5.17	6.10	5.99	6.27	5.92	5.21	5.73	5.62	5.14	5.17	5.38	5.90	5.84	6.10	6.23	6.35
E12000006	East of England	E07000145	Great Yarmouth	2.83	2.92	2.64	2.77	3.15	3.56	4.43	5.55	5.56	5.43	5.62	5.56	5.29	5.74	5.16	5.08	5.28	5.66	5.43	5.31	6.43	6.38	6.33
E12000002	North West	E08000008	Tameside	2.84	2.80	2.87	2.98	2.96	3.08	3.84	4.69	5.13	5.82	5.91	5.81	4.91	5.29	5.11	4.68	5.13	5.46	5.75	5.56	5.55	6.07	6.27
E12000004	East Midlands	E07000174	Mansfield	2.94	3.01	3.24	3.13	2.96	3.48	4.20	5.02	5.62	5.39	5.49	5.18	4.84	5.35	5.31	5.27	5.28	5.53	5.89	6.19	6.03	5.96	6.26
E12000004	East Midlands	E07000173	Gedling	2.93	3.18	3.40	3.40	3.75	4.14	5.14	5.68	5.42	6.07	5.08	5.29	4.82	5.72	6.67	4.80	4.40	4.69	6.36	6.25	5.41	5.29	6.25
E12000002	North West	E08000015	Wirral	3.02	3.00	3.13	3.31	3.28	3.73	4.68	5.74	5.74	6.28	6.64	6.44	5.93	6.09	6.17	6.07	5.63	5.60	5.40	5.70	5.92	6.22	6.20
E12000004	East Midlands	E07000036	Erewash	2.98	2.97	3.08	3.12	3.26	3.89	4.44	4.95	5.90	6.20	6.14	5.95	5.49	5.53	5.85	5.21	4.94	5.39	5.81	5.24	5.50	5.90	6.19
E12000005	West Midlands	E07000195	Newcastle-under-Lyme	3.43	2.98	3.24	3.27	3.32	3.57	4.26	5.18	5.68	6.31	6.03	5.99	5.84	6.23	5.85	5.88	5.37	5.68	6.34	6.05	5.51	5.83	6.18
E12000003	Yorkshire and The Humber	E07000168	Scarborough	4.11	3.77	3.55	3.80	3.53	4.35	4.89	6.34	7.14	7.64	7.54	7.14	6.14	6.29	6.29	6.21	6.42	6.08	5.82	5.91	6.33	6.66	6.17
E12000003	Yorkshire and The Humber	E08000035	Leeds	3.36	3.34	3.43	3.38	3.66	4.12	4.77	5.71	5.86	6.01	6.24	5.98	5.24	5.70	5.63	5.56	5.43	5.65	5.72	6.00	6.26	6.15	6.15
W92000004	Wales	W06000022	Newport	2.87	2.67	2.90	3.15	3.77	4.44	5.36	5.75	5.81	5.89	5.66	5.34	5.24	5.07	5.19	5.23	5.48	5.96	6.11	6.00	6.08	6.14	6.14
E12000005	West Midlands	E08000026	Coventry	2.67	2.50	2.55	2.81	2.86	3.30	3.81	4.60	4.84	4.98	5.35	4.83	4.59	4.84	4.62	4.50	4.24	4.84	5.11	5.33	5.52	5.66	6.08
E12000001	North East	E08000022	North Tyneside	3.40	3.37	3.50	3.30	3.24	3.31	4.41	5.46	5.88	6.22	6.67	5.94	5.46	5.69	5.43	5.44	5.48	5.75	6.06	6.12	6.30	6.10	6.07
E12000002	North West	E07000128	Wyre	3.69	3.83	3.72	4.21	4.03	4.71	5.27	6.54	7.20	7.52	7.87	6.22	6.53	7.67	7.02	6.39	6.46	6.46	6.09	6.31	6.69	6.54	6.04
E12000005	West Midlands	E06000020	Telford and Wrekin	3.12	3.17	3.60	3.47	3.81	4.01	4.65	5.69	5.98	6.15	5.65	5.66	5.94	6.20	6.14	5.78	5.71	5.83	5.61	6.10	6.44	6.19	6.03
E12000004	East Midlands	E07000032	Amber Valley	2.98	3.05	3.21	3.32	3.45	3.99	4.96	5.49	5.54	5.85	6.02	5.41	5.03	5.71	5.40	4.71	5.20	5.36	5.69	5.59	5.39	5.94	5.95
E12000005	West Midlands	E07000198	Staffordshire Moorlands	3.16	3.02	3.46	3.45	3.50	4.05	4.55	6.54	5.96	6.42	6.66	6.15	5.80	6.19	6.04	5.18	5.24	5.16	7.09	5.97	6.07	6.51	5.89
E12000002	North West	E08000003	Manchester	2.30	2.49	2.46	2.58	2.73	3.29	3.54	4.19	4.68	5.33	5.31	5.13	4.54	4.67	4.86	4.61	4.48	4.77	5.10	5.18	5.36	5.67	5.87
E12000005	West Midlands	E08000025	Birmingham	2.81	2.84	2.93	3.04	3.16	3.76	4.67	5.54	5.58	5.61	5.68	5.42	4.82	5.02	4.88	4.80	4.77	5.24	5.07	5.33	5.62	5.67	5.87
E12000003	Yorkshire and The Humber	E08000034	Kirklees	2.95	2.94	3.02	3.14	3.00	3.27	3.98	5.13	5.50	5.82	6.02	6.10	5.63	5.61	5.52	5.29	5.36	5.35	5.75	5.68	5.69	5.76	5.85
E12000005	West Midlands	E08000028	Sandwell	2.93	2.89	2.85	2.79	3.07	3.37	4.12	5.03	5.20	5.44	5.59	5.12	4.88	5.04	4.82	4.68	4.59	4.92	5.04	5.34	5.40	5.68	5.82
E12000004	East Midlands	E07000138	Lincoln	2.45	2.53	2.49	2.50	2.64	3.00	4.22	5.02	5.42	5.56	5.99	5.73	4.95	5.01	5.01	4.92	4.94	4.91	5.52	5.39	5.54	5.41	5.79
E12000002	North West	E07000126	South Ribble	3.01	3.09	3.20	3.15	3.39	3.55	4.44	6.12	6.21	6.14	6.04	5.87	6.41	6.55	6.05	5.89	5.96	6.54	6.31	6.28	6.12	6.56	5.76
E12000002	North West	E08000010	Wigan	2.83	3.00	2.99	2.82	2.89	3.13	3.55	4.51	4.84	5.31	5.29	5.20	4.89	4.92	4.97	5.11	4.72	5.35	5.20	5.17	5.37	5.37	5.74
E12000004	East Midlands	E07000170	Ashfield	2.78	3.01	2.99	3.06	2.84	3.20	3.99	4.97	4.97	5.15	5.66	5.20	4.45	4.47	5.04	4.91	5.03	5.27	5.60	5.25	5.56	5.04	5.74
E12000005	West Midlands	E08000030	Walsall	3.29	3.33	3.32	3.46	3.60	4.12	4.92	5.96	5.99	6.01	6.36	5.96	5.74	5.55	5.37	5.25	5.34	5.40	5.24	5.39	5.99	6.20	5.73
E12000001	North East	E08000021	Newcastle upon Tyne	3.08	3.29	3.31	3.00	3.30	3.95	5.03	6.19	5.75	6.51	6.61	6.43	5.43	5.62	5.36	5.22	5.43	5.44	5.55	5.78	5.47	5.75	5.71
E12000002	North West	E07000121	Lancaster	2.75	2.82	2.89	2.82	2.84	2.96	3.82	4.73	5.40	5.62	5.61	5.87	5.18	5.57	4.97	5.17	5.03	5.42	5.35	5.14	5.42	5.73	5.67
E12000002	North West	E08000006	Salford	2.50	2.54	2.57	2.61	2.56	2.59	3.43	4.22	4.96	5.04	5.54	5.46	4.92	4.81	4.33	4.30	4.33	4.47	4.60	5.07	5.69	5.84	5.67
E12000003	Yorkshire and The Humber	E08000036	Wakefield	2.94	2.91	2.95	2.91	2.94	3.27	4.04	4.84	5.33	5.38	5.43	5.07	4.97	5.31	4.97	4.74	4.89	5.11	5.35	5.51	5.79	5.61	5.66
E12000003	Yorkshire and The Humber	E08000019	Sheffield	2.84	2.79	3.00	2.96	3.17	3.47	4.19	5.03	5.29	5.61	5.93	5.48	5.09	5.45	5.17	5.00	4.87	5.18	5.28	5.22	5.52	5.66	5.65
W92000004	Wales	W06000004	Denbighshire	2.95	2.81	2.85	3.04	2.91	3.38	4.36	5.19	6.32	6.49	6.65	6.52	5.22	5.90	5.36	5.37	5.33	5.02	5.27	5.25	5.60	5.71	5.65
E12000002	North West	E07000125	Rossendale	2.68	3.23	3.18	3.05	3.22	3.27	4.00	5.35	5.88	6.30	6.65	6.66	5.64	6.13	5.74	4.94	5.40	5.94	5.78	6.27	6.43	5.85	5.63
E12000004	East Midlands	E07000																								

E12000002	North West	E06000006	Halton	2.83	2.70	2.74	2.80	3.02	2.91	3.71	4.44	4.87	4.59	5.10	4.66	4.63	4.68	4.70	4.57	4.75	4.66	4.55	4.92	4.76	4.79	4.83
E12000001	North East	E08000024	Sunderland	2.94	2.83	2.87	2.89	2.75	3.12	3.71	4.66	4.90	5.09	5.21	4.98	4.65	4.72	4.62	4.63	4.54	4.59	4.75	4.62	4.78	4.87	4.79
E12000002	North West	E06000008	Blackburn with Darwen	2.31	2.28	2.45	2.46	2.23	2.39	2.66	3.18	3.66	4.08	4.77	4.49	4.28	4.25	4.03	4.09	3.94	4.07	4.39	4.15	4.25	4.96	4.64
E12000001	North East	E06000047	County Durham	:	:	:	:	:	:	3.38	4.40	4.85	5.61	5.43	5.47	4.93	5.12	4.64	4.54	4.47	4.64	4.57	4.59	4.54	4.53	4.54
E12000005	West Midlands	E06000021	Stoke-on-Trent	2.39	2.31	2.30	2.41	2.27	2.45	2.68	3.81	4.37	4.44	4.39	4.22	3.93	3.85	3.75	3.81	3.80	4.13	4.12	4.29	4.50	4.39	4.51
E12000002	North West	E06000009	Blackpool	3.00	3.13	2.97	3.03	3.07	3.26	3.68	4.77	5.30	5.88	6.21	6.28	5.15	5.63	5.04	4.62	4.71	4.84	4.66	5.05	4.65	4.53	4.48
E12000002	North West	E07000122	Pendle	2.10	2.19	2.14	2.24	2.00	2.15	2.35	3.16	3.17	3.96	4.64	4.35	4.27	4.20	3.80	3.67	3.74	3.86	3.83	3.86	4.04	3.66	4.40
E12000003	Yorkshire and The Humber	E06000010	Kingston upon Hull, City of	2.18	2.16	2.20	2.19	2.19	2.22	2.65	3.09	3.28	3.81	4.12	4.06	3.68	3.97	3.71	3.81	3.89	4.09	4.14	4.11	4.61	4.34	4.36
E12000002	North West	E08000012	Liverpool	2.49	2.33	2.48	2.42	2.67	2.83	3.16	4.10	4.60	5.01	5.23	4.90	4.55	4.49	4.22	4.27	4.17	4.24	4.36	4.43	4.63	4.68	4.22
E12000004	East Midlands	E06000015	Derby	2.52	2.23	2.33	2.52	2.51	2.87	3.30	4.11	4.40	4.49	5.71	4.47	3.77	3.87	3.82	3.73	3.73	3.88	4.03	4.44	4.51	4.28	4.22
W92000004	Wales	W06000024	Merthyr Tydfil	1.92	2.09	2.27	2.36	2.17	2.28	2.27	3.02	3.85	4.48	5.02	4.71	4.34	4.40	4.03	4.08	3.93	4.37	4.25	3.83	4.14	3.78	4.09
E12000002	North West	E07000117	Burnley	2.06	2.29	2.19	2.06	2.00	1.66	1.67	2.04	2.42	3.05	3.62	3.76	3.74	3.76	3.59	3.41	3.31	3.82	3.68	3.92	3.86	4.00	4.08
W92000004	Wales	W06000016	Rhondda Cynon Taf	2.47	2.40	2.42	2.50	2.54	2.47	2.91	3.58	4.43	4.50	4.73	4.49	4.07	4.06	3.92	4.05	3.79	3.80	4.13	4.28	4.13	4.40	4.07
E12000002	North West	E07000120	Hyndburn	2.35	2.10	2.55	2.55	2.65	2.25	2.45	3.42	3.71	4.36	4.97	4.61	4.04	3.93	4.05	4.38	3.92	3.92	4.05	4.14	4.14	4.23	3.70
W92000004	Wales	W06000012	Neath Port Talbot	2.19	2.00	2.14	2.07	2.09	2.13	2.32	3.20	3.73	3.76	4.18	4.10	4.03	3.50	3.74	3.66	3.89	3.69	3.65	3.65	3.81	3.59	3.68
E12000002	North West	E07000027	Barrow-in-Furness	2.13	2.03	1.87	2.05	1.82	2.27	2.50	2.81	3.42	3.60	4.04	3.83	3.65	3.87	3.67	3.22	3.20	3.32	3.89	3.82	3.71	3.54	3.56
W92000004	Wales	W06000019	Blaenau Gwent	2.21	2.02	2.09	2.18	2.09	2.33	2.28	3.10	3.79	4.29	4.49	5.05	3.73	3.90	3.63	3.60	3.52	3.51	3.38	3.73	3.39	3.60	3.19
E12000002	North West	E07000029	Copeland	1.96	1.85	1.91	1.71	1.70	1.70	1.82	2.33	2.94	3.18	3.11	3.04	2.79	3.31	2.87	2.54	2.63	2.66	2.59	2.87	2.72	2.50	2.78

Source: Office for National Statistics

Notes:

- House price data are taken from ONS House Price Statistics for Small Areas for the year ending September.
- Earnings data are taken from the Annual Survey of Hours and Earnings. These figures are estimates of gross workplace-based individual full-time annual earnings where available.
- Data for annual earnings are not available before 1999 and for some areas since 1999. For these areas the ratio of house prices to earnings has been calculated using annualised weekly earnings. These are recorded in *bold grey italics*. Annualised weekly earnings are not produced on an identical basis to annual earnings and are therefore not directly comparable.
- These affordability ratio statistics are revised annually, to reflect revisions to the house price statistics and earnings data. The earnings data used in the housing affordability calculations comes from the Annual Survey of Hours and Earnings. The data for the latest year is released as provisional, and then revised with the following annual release. Earnings data is collected as at April of each year with the results published in October. Therefore, new information can still be received subsequently, and this is inputted into the revised data. In addition, house price statistics are also subject to revision, as there can be a lag in the registration of property transactions.
- If a geography change is made, the entire time series reflects the new structure, avoiding geographical breaks in the time series

Appendix 10

Date	RegionName	DetachedPrice	Detached 1m % Change	Detached 12m % Change	SemiDetachedPrice	SemiDetached 1m % Change	SemiDetached 12m % Change	TerracedPrice	Terraced 1m % Change	Terraced 12m % Change	FlatPrice	Flat 1m % Change	Flat 12m % Change
01/01/2010	Richmond upon Thames	£ 829,016	2.08	14.86	£ 558,423	2.27	17.39	£ 448,707	2.39	19.43	£ 299,903	1.70	13.96
01/02/2010	Richmond upon Thames	£ 850,824	2.63	16.57	£ 575,058	2.98	18.85	£ 459,270	2.35	20.27	£ 304,911	1.67	13.39
01/03/2010	Richmond upon Thames	£ 863,074	1.44	19.72	£ 579,856	0.83	20.98	£ 461,862	0.56	22.22	£ 306,392	0.49	14.42
01/04/2010	Richmond upon Thames	£ 847,790	-1.77	21.04	£ 569,606	-1.77	20.78	£ 454,614	-1.57	21.02	£ 301,540	-1.58	14.23
01/05/2010	Richmond upon Thames	£ 837,521	-1.21	20.25	£ 562,041	-1.33	19.47	£ 449,751	-1.07	18.95	£ 299,874	-0.55	14.02
01/06/2010	Richmond upon Thames	£ 840,785	0.39	19.85	£ 565,707	0.65	19.10	£ 453,495	0.83	17.83	£ 301,035	0.39	13.80
01/07/2010	Richmond upon Thames	£ 855,856	1.79	19.00	£ 571,668	1.05	17.42	£ 459,434	1.31	16.84	£ 302,473	0.48	12.79
01/08/2010	Richmond upon Thames	£ 861,857	0.70	15.54	£ 577,301	0.99	14.83	£ 464,696	1.15	15.34	£ 302,978	0.17	10.55
01/09/2010	Richmond upon Thames	£ 874,502	1.47	14.35	£ 583,324	1.04	13.24	£ 469,101	0.95	13.92	£ 304,235	0.41	9.01
01/10/2010	Richmond upon Thames	£ 867,183	-0.84	9.67	£ 580,761	-0.44	9.35	£ 465,752	-0.71	10.12	£ 302,828	-0.46	5.65
01/11/2010	Richmond upon Thames	£ 866,129	-0.12	8.63	£ 577,066	-0.64	7.89	£ 462,072	-0.79	7.73	£ 301,966	-0.28	4.38
01/12/2010	Richmond upon Thames	£ 871,290	0.60	7.29	£ 581,706	0.80	6.53	£ 464,121	0.44	5.90	£ 304,195	0.74	3.16
01/01/2011	Richmond upon Thames	£ 892,628	2.45	7.67	£ 591,475	1.68	5.92	£ 469,437	1.15	4.62	£ 307,826	1.19	2.64
01/02/2011	Richmond upon Thames	£ 912,432	2.22	7.24	£ 598,912	1.26	4.15	£ 472,641	0.68	2.91	£ 309,857	0.66	1.62
01/03/2011	Richmond upon Thames	£ 907,255	-0.57	5.12	£ 588,357	-1.76	1.47	£ 464,380	-1.75	0.55	£ 303,450	-2.07	-0.96
01/04/2011	Richmond upon Thames	£ 907,201	-0.01	7.01	£ 588,289	-0.01	3.28	£ 466,070	0.36	2.52	£ 304,418	0.32	0.95
01/05/2011	Richmond upon Thames	£ 893,054	-1.56	6.63	£ 586,156	-0.36	4.29	£ 468,835	0.59	4.24	£ 306,649	0.73	2.26
01/06/2011	Richmond upon Thames	£ 874,453	-2.08	4.00	£ 582,678	-0.59	3.00	£ 468,013	-0.18	3.20	£ 306,637	0.00	1.86
01/07/2011	Richmond upon Thames	£ 873,445	-0.12	2.06	£ 585,764	0.53	2.47	£ 471,560	0.76	2.64	£ 308,943	0.75	2.14
01/08/2011	Richmond upon Thames	£ 894,041	2.36	3.73	£ 597,874	2.07	3.56	£ 477,933	1.35	2.85	£ 310,384	0.47	2.44
01/09/2011	Richmond upon Thames	£ 934,416	4.52	6.85	£ 619,930	3.69	6.28	£ 494,378	3.44	5.39	£ 319,192	2.84	4.92
01/10/2011	Richmond upon Thames	£ 938,849	0.47	8.26	£ 621,784	0.30	7.06	£ 493,145	-0.25	5.88	£ 317,905	-0.40	4.98
01/11/2011	Richmond upon Thames	£ 929,544	-0.99	7.32	£ 613,535	-1.33	6.32	£ 485,826	-1.48	5.14	£ 315,076	-0.89	4.34
01/12/2011	Richmond upon Thames	£ 906,280	-2.50	4.02	£ 602,492	-1.80	3.57	£ 479,484	-1.31	3.31	£ 311,778	-1.05	2.49
01/01/2012	Richmond upon Thames	£ 896,783	-1.05	0.47	£ 599,289	-0.53	1.32	£ 478,166	-0.27	1.86	£ 309,705	-0.66	0.61
01/02/2012	Richmond upon Thames	£ 914,616	1.99	0.24	£ 611,270	2.00	2.06	£ 487,022	1.85	3.04	£ 313,690	1.29	1.24
01/03/2012	Richmond upon Thames	£ 919,542	0.54	1.35	£ 613,552	0.37	4.28	£ 486,515	-0.10	4.77	£ 313,989	0.10	3.47
01/04/2012	Richmond upon Thames	£ 924,465	0.54	1.90	£ 615,488	0.32	4.62	£ 488,850	0.48	4.89	£ 316,913	0.93	4.10
01/05/2012	Richmond upon Thames	£ 917,413	-0.76	2.73	£ 613,283	-0.36	4.63	£ 491,705	0.58	4.88	£ 318,466	0.49	3.85
01/06/2012	Richmond upon Thames	£ 935,637	1.99	7.00	£ 626,278	2.12	7.48	£ 506,229	2.95	8.17	£ 324,662	1.95	5.88
01/07/2012	Richmond upon Thames	£ 962,433	2.86	10.19	£ 643,107	2.69	9.79	£ 519,975	2.72	10.27	£ 331,913	2.23	7.44
01/08/2012	Richmond upon Thames	£ 968,036	0.58	8.28	£ 647,060	0.61	8.23	£ 524,916	0.95	9.83	£ 332,038	0.04	6.98
01/09/2012	Richmond upon Thames	£ 962,648	-0.56	3.02	£ 641,443	-0.87	3.47	£ 518,079	-1.30	4.79	£ 328,396	-1.10	2.88
01/10/2012	Richmond upon Thames	£ 940,346	-2.32	0.16	£ 627,632	-2.15	0.94	£ 507,926	-1.96	3.00	£ 321,778	-2.02	1.22
01/11/2012	Richmond upon Thames	£ 953,197	1.37	2.54	£ 635,375	1.23	3.56	£ 513,443	1.09	5.68	£ 326,142	1.36	3.51
01/12/2012	Richmond upon Thames	£ 960,170	0.73	5.95	£ 640,814	0.86	6.36	£ 518,788	1.04	8.20	£ 328,819	0.82	5.47
01/01/2013	Richmond upon Thames	£ 983,373	2.42	9.66	£ 655,732	2.33	9.42	£ 526,358	1.46	10.08	£ 333,537	1.43	7.69
01/02/2013	Richmond upon Thames	£ 988,722	0.54	8.10	£ 658,009	0.35	7.65	£ 525,059	-0.25	7.81	£ 333,712	0.05	6.38
01/03/2013	Richmond upon Thames	£ 991,321	0.26	7.81	£ 658,604	0.09	7.34	£ 525,040	0.00	7.92	£ 334,596	0.26	6.56
01/04/2013	Richmond upon Thames	£ 998,810	0.76	8.04	£ 662,366	0.57	7.62	£ 535,423	1.98	9.53	£ 338,890	1.28	6.93
01/05/2013	Richmond upon Thames	£ 999,679	0.09	8.97	£ 663,759	0.21	8.23	£ 537,987	0.48	9.41	£ 340,244	0.40	6.84
01/06/2013	Richmond upon Thames	£ 1,012,607	1.29	8.23	£ 673,970	1.54	7.62	£ 546,829	1.64	8.02	£ 344,209	1.17	6.02
01/07/2013	Richmond upon Thames	£ 1,014,578	0.19	5.42	£ 677,339	0.50	5.32	£ 548,571	0.32	5.50	£ 345,090	0.26	3.97
01/08/2013	Richmond upon Thames	£ 1,041,014	2.61	7.54	£ 696,186	2.78	7.59	£ 565,696	3.12	7.77	£ 353,483	2.43	6.46
01/09/2013	Richmond upon Thames	£ 1,056,858	1.52	9.79	£ 703,786	1.09	9.72	£ 570,375	0.83	10.09	£ 357,230	1.06	8.78
01/10/2013	Richmond upon Thames	£ 1,063,490	0.63	13.10	£ 707,824	0.57	12.78	£ 573,092	0.48	12.83	£ 359,909	0.75	11.85
01/11/2013	Richmond upon Thames	£ 1,047,414	-1.51	9.88	£ 697,567	-1.45	9.79	£ 565,230	-1.37	10.09	£ 356,212	-1.03	9.22
01/12/2013	Richmond upon Thames	£ 1,033,049	-1.37	7.59	£ 692,602	-0.71	8.08	£ 562,108	-0.55	8.35	£ 355,195	-0.29	8.02
01/01/2014	Richmond upon Thames	£ 1,056,018	2.22	7.39	£ 706,362	1.99	7.72	£ 570,563	1.50	8.40	£ 361,940	1.90	8.52

Date	RegionName	DetachedPrice	Detached 1m % Change	Detached 12m % Change	SemiDetachedPrice	SemiDetached 1m % Change	SemiDetached 12m % Change	TerracedPrice	Terraced 1m % Change	Terraced 12m % Change	FlatPrice	Flat 1m % Change	Flat 12m % Change
01/02/2014	Richmond upon Thames	£ 1,069,652	1.29	8.19	£ 712,241	0.83	8.24	£ 571,882	0.23	8.92	£ 364,623	0.74	9.26
01/03/2014	Richmond upon Thames	£ 1,109,725	3.75	11.94	£ 736,669	3.43	11.85	£ 592,394	3.59	12.83	£ 377,016	3.40	12.68
01/04/2014	Richmond upon Thames	£ 1,151,390	3.75	15.28	£ 764,183	3.73	15.37	£ 615,893	3.97	15.03	£ 391,002	3.71	15.38
01/05/2014	Richmond upon Thames	£ 1,185,715	2.98	18.61	£ 789,700	3.34	18.97	£ 639,310	3.80	18.83	£ 404,563	3.47	18.90
01/06/2014	Richmond upon Thames	£ 1,208,038	1.88	19.30	£ 806,187	2.09	19.62	£ 655,094	2.47	19.80	£ 413,228	2.14	20.05
01/07/2014	Richmond upon Thames	£ 1,227,089	1.58	20.95	£ 821,621	1.91	21.30	£ 669,460	2.19	22.04	£ 420,598	1.78	21.88
01/08/2014	Richmond upon Thames	£ 1,249,209	1.80	20.00	£ 836,222	1.78	20.11	£ 680,918	1.71	20.37	£ 426,592	1.43	20.68
01/09/2014	Richmond upon Thames	£ 1,272,924	1.90	20.44	£ 850,802	1.74	20.89	£ 687,992	1.04	20.62	£ 432,332	1.35	21.02
01/10/2014	Richmond upon Thames	£ 1,263,644	-0.73	18.82	£ 843,100	-0.91	19.11	£ 678,808	-1.33	18.45	£ 429,194	-0.73	19.25
01/11/2014	Richmond upon Thames	£ 1,263,727	0.01	20.65	£ 842,014	-0.13	20.71	£ 676,040	-0.41	19.60	£ 429,577	0.09	20.60
01/12/2014	Richmond upon Thames	£ 1,252,427	-0.89	21.24	£ 834,438	-0.90	20.48	£ 670,572	-0.81	19.30	£ 427,247	-0.54	20.29
01/01/2015	Richmond upon Thames	£ 1,226,628	-2.06	16.16	£ 818,432	-1.92	15.87	£ 658,097	-1.86	15.34	£ 418,663	-2.01	15.67
01/02/2015	Richmond upon Thames	£ 1,223,771	-0.23	14.41	£ 816,678	-0.21	14.66	£ 656,350	-0.27	14.77	£ 418,010	-0.16	14.64
01/03/2015	Richmond upon Thames	£ 1,224,388	0.05	10.33	£ 818,036	0.17	11.05	£ 659,223	0.44	11.28	£ 418,759	0.18	11.07
01/04/2015	Richmond upon Thames	£ 1,253,177	2.35	8.84	£ 835,057	2.08	9.27	£ 672,575	2.03	9.20	£ 427,499	2.09	9.33
01/05/2015	Richmond upon Thames	£ 1,244,369	-0.70	4.95	£ 831,467	-0.43	5.29	£ 671,078	-0.22	4.97	£ 426,310	-0.28	5.38
01/06/2015	Richmond upon Thames	£ 1,253,338	0.72	3.75	£ 837,605	0.74	3.90	£ 676,058	0.74	3.20	£ 427,372	0.25	3.42
01/07/2015	Richmond upon Thames	£ 1,262,543	0.73	2.89	£ 847,100	1.13	3.10	£ 685,155	1.35	2.34	£ 431,967	1.08	2.70
01/08/2015	Richmond upon Thames	£ 1,302,258	3.15	4.25	£ 873,530	3.12	4.46	£ 707,460	3.26	3.90	£ 444,151	2.82	4.12
01/09/2015	Richmond upon Thames	£ 1,330,685	2.18	4.54	£ 888,707	1.74	4.46	£ 716,448	1.27	4.14	£ 451,901	1.74	4.53
01/10/2015	Richmond upon Thames	£ 1,359,760	2.18	7.61	£ 906,614	2.01	7.53	£ 728,823	1.73	7.37	£ 460,143	1.82	7.21
01/11/2015	Richmond upon Thames	£ 1,341,873	-1.32	6.18	£ 893,677	-1.43	6.14	£ 715,931	-1.77	5.90	£ 452,915	-1.57	5.43
01/12/2015	Richmond upon Thames	£ 1,329,955	-0.89	6.19	£ 887,962	-0.64	6.41	£ 712,542	-0.47	6.26	£ 450,098	-0.62	5.35
01/01/2016	Richmond upon Thames	£ 1,333,537	0.27	8.72	£ 893,573	0.63	9.18	£ 715,252	0.38	8.68	£ 452,017	0.43	7.97
01/02/2016	Richmond upon Thames	£ 1,357,896	1.83	10.96	£ 908,127	1.63	11.20	£ 725,472	1.43	10.53	£ 458,446	1.42	9.67
01/03/2016	Richmond upon Thames	£ 1,383,332	1.87	12.98	£ 922,373	1.57	12.75	£ 735,767	1.42	11.61	£ 465,354	1.51	11.13
01/04/2016	Richmond upon Thames	£ 1,346,956	-2.63	7.48	£ 895,268	-2.94	7.21	£ 719,733	-2.18	7.01	£ 454,997	-2.23	6.43
01/05/2016	Richmond upon Thames	£ 1,345,888	-0.08	8.16	£ 899,539	0.48	8.19	£ 728,639	1.24	8.58	£ 462,259	1.60	8.43
01/06/2016	Richmond upon Thames	£ 1,335,735	-0.75	6.57	£ 894,870	-0.52	6.84	£ 727,994	-0.09	7.68	£ 463,352	0.24	8.42
01/07/2016	Richmond upon Thames	£ 1,381,463	3.42	9.42	£ 927,516	3.65	9.49	£ 753,568	3.51	9.98	£ 479,244	3.43	10.94
01/08/2016	Richmond upon Thames	£ 1,372,025	-0.68	5.36	£ 919,098	-0.91	5.22	£ 745,714	-1.04	5.41	£ 473,805	-1.14	6.68
01/09/2016	Richmond upon Thames	£ 1,361,537	-0.76	2.32	£ 915,321	-0.41	2.99	£ 741,886	-0.51	3.55	£ 470,687	-0.66	4.16
01/10/2016	Richmond upon Thames	£ 1,308,835	-3.87	-3.75	£ 878,793	-3.99	-3.07	£ 708,205	-4.54	-2.83	£ 452,997	-3.76	-1.55
01/11/2016	Richmond upon Thames	£ 1,314,399	0.43	-2.05	£ 879,426	0.07	-1.59	£ 707,511	-0.10	-1.18	£ 453,580	0.13	0.15
01/12/2016	Richmond upon Thames	£ 1,313,351	-0.08	-1.25	£ 875,330	-0.47	-1.42	£ 704,168	-0.47	-1.18	£ 453,334	-0.05	0.72
01/01/2017	Richmond upon Thames	£ 1,348,484	2.68	1.12	£ 897,786	2.57	0.47	£ 725,033	2.96	1.37	£ 465,202	2.62	2.92
01/02/2017	Richmond upon Thames	£ 1,343,557	-0.37	-1.06	£ 894,498	-0.37	-1.50	£ 721,578	-0.48	-0.54	£ 466,564	0.29	1.77
01/03/2017	Richmond upon Thames	£ 1,357,880	1.07	-1.84	£ 903,396	0.99	-2.06	£ 729,333	1.07	-0.87	£ 471,842	1.13	1.39
01/04/2017	Richmond upon Thames	£ 1,364,916	0.52	2.66	£ 904,993	0.18	2.91	£ 730,188	0.12	3.06	£ 474,300	0.52	4.98
01/05/2017	Richmond upon Thames	£ 1,375,740	0.79	2.94	£ 915,430	1.15	2.68	£ 738,551	1.15	2.39	£ 479,808	1.16	4.33
01/06/2017	Richmond upon Thames	£ 1,373,745	-0.14	2.85	£ 917,528	0.23	2.53	£ 742,422	0.52	1.98	£ 482,561	0.57	4.15
01/07/2017	Richmond upon Thames	£ 1,366,854	-0.50	-1.06	£ 918,417	0.10	-0.98	£ 742,764	0.05	-1.43	£ 483,280	0.15	0.84
01/08/2017	Richmond upon Thames	£ 1,386,900	1.47	1.08	£ 931,645	1.44	1.37	£ 754,486	1.58	1.18	£ 487,262	0.82	2.84
01/09/2017	Richmond upon Thames	£ 1,378,518	-0.60	1.25	£ 924,826	-0.73	1.04	£ 744,815	-1.28	0.39	£ 480,350	-1.42	2.05
01/10/2017	Richmond upon Thames	£ 1,374,002	-0.33	4.98	£ 919,638	-0.56	4.65	£ 739,164	-0.76	4.37	£ 475,150	-1.08	4.89
01/11/2017	Richmond upon Thames	£ 1,337,707	-2.64	1.77	£ 896,426	-2.52	1.93	£ 719,546	-2.65	1.70	£ 463,345	-2.48	2.15
01/12/2017	Richmond upon Thames	£ 1,333,773	-0.29	1.55	£ 893,845	-0.29	2.12	£ 718,253	-0.18	2.00	£ 461,820	-0.33	1.87
01/01/2018	Richmond upon Thames	£ 1,307,645	-1.96	-3.03	£ 878,390	-1.73	-2.16	£ 706,026	-1.70	-2.62	£ 454,366	-1.61	-2.33
01/02/2018	Richmond upon Thames	£ 1,306,954	-0.05	-2.72	£ 876,017	-0.27	-2.07	£ 703,062	-0.42	-2.57	£ 451,738	-0.58	-3.18

Date	RegionName	DetachedPrice	Detached 1m % Change	Detached 12m % Change	SemiDetachedPrice	SemiDetached 1m % Change	SemiDetached 12m % Change	TerracedPrice	Terraced 1m % Change	Terraced 12m % Change	FlatPrice	Flat 1m % Change	Flat 12m % Change
01/03/2018	Richmond upon Thames	£ 1,309,823	0.22	-3.54	£ 880,597	0.52	-2.52	£ 707,831	0.68	-2.95	£ 453,330	0.35	-3.92
01/04/2018	Richmond upon Thames	£ 1,331,221	1.63	-2.47	£ 895,422	1.68	-1.06	£ 720,426	1.78	-1.34	£ 458,741	1.19	-3.28
01/05/2018	Richmond upon Thames	£ 1,344,737	1.02	-2.25	£ 906,747	1.26	-0.95	£ 731,472	1.53	-0.96	£ 462,419	0.80	-3.62
01/06/2018	Richmond upon Thames	£ 1,340,288	-0.33	-2.44	£ 903,245	-0.39	-1.56	£ 724,110	-1.01	-2.47	£ 458,525	-0.84	-4.98
01/07/2018	Richmond upon Thames	£ 1,370,976	2.29	0.30	£ 920,247	1.88	0.20	£ 736,716	1.74	-0.81	£ 465,643	1.55	-3.65
01/08/2018	Richmond upon Thames	£ 1,385,996	1.10	-0.07	£ 928,100	0.85	-0.38	£ 740,334	0.49	-1.88	£ 468,808	0.68	-3.79
01/09/2018	Richmond upon Thames	£ 1,407,748	1.57	2.12	£ 941,555	1.45	1.81	£ 755,064	1.99	1.38	£ 474,590	1.23	-1.20
01/10/2018	Richmond upon Thames	£ 1,365,769	-2.98	-0.60	£ 913,026	-3.03	-0.72	£ 731,634	-3.10	-1.02	£ 460,410	-2.99	-3.10
01/11/2018	Richmond upon Thames	£ 1,353,941	-0.87	1.21	£ 901,981	-1.21	0.62	£ 722,619	-1.23	0.43	£ 453,272	-1.55	-2.17
01/12/2018	Richmond upon Thames	£ 1,345,569	-0.62	0.88	£ 897,118	-0.54	0.37	£ 713,166	-1.31	-0.71	£ 451,760	-0.33	-2.18
01/01/2019	Richmond upon Thames	£ 1,370,268	1.84	4.79	£ 913,848	1.86	4.04	£ 726,338	1.85	2.88	£ 459,668	1.75	1.17
01/02/2019	Richmond upon Thames	£ 1,369,246	-0.07	4.77	£ 914,868	0.11	4.44	£ 725,505	-0.11	3.19	£ 461,488	0.40	2.16
01/03/2019	Richmond upon Thames	£ 1,346,903	-1.63	2.83	£ 901,209	-1.49	2.34	£ 717,570	-1.09	1.38	£ 453,518	-1.73	0.04
01/04/2019	Richmond upon Thames	£ 1,328,746	-1.35	-0.19	£ 889,666	-1.28	-0.64	£ 711,272	-0.88	-1.27	£ 447,747	-1.27	-2.40
01/05/2019	Richmond upon Thames	£ 1,315,072	-1.03	-2.21	£ 884,904	-0.54	-2.41	£ 711,461	0.03	-2.74	£ 443,952	-0.85	-3.99
01/06/2019	Richmond upon Thames	£ 1,343,759	2.18	0.26	£ 906,289	2.42	0.34	£ 729,242	2.50	0.71	£ 454,153	2.30	-0.95
01/07/2019	Richmond upon Thames	£ 1,348,110	0.32	-1.67	£ 913,247	0.77	-0.76	£ 733,630	0.60	-0.42	£ 457,117	0.65	-1.83
01/08/2019	Richmond upon Thames	£ 1,352,488	0.32	-2.42	£ 916,825	0.39	-1.21	£ 735,616	0.27	-0.64	£ 456,909	-0.05	-2.54
01/09/2019	Richmond upon Thames	£ 1,337,714	-1.09	-4.97	£ 903,189	-1.49	-4.07	£ 725,951	-1.31	-3.86	£ 450,139	-1.48	-5.15
01/10/2019	Richmond upon Thames	£ 1,338,609	0.07	-1.99	£ 902,423	-0.08	-1.16	£ 720,590	-0.74	-1.51	£ 447,132	-0.67	-2.88
01/11/2019	Richmond upon Thames	£ 1,353,759	1.13	-0.01	£ 910,237	0.87	0.92	£ 726,534	0.82	0.54	£ 450,287	0.71	-0.66
01/12/2019	Richmond upon Thames	£ 1,364,714	0.81	1.42	£ 916,052	0.64	2.11	£ 730,003	0.48	2.36	£ 452,136	0.41	0.08
01/01/2020	Richmond upon Thames	£ 1,379,916	1.11	0.70	£ 927,626	1.26	1.51	£ 741,151	1.53	2.04	£ 457,672	1.22	-0.43
01/02/2020	Richmond upon Thames	£ 1,375,451	-0.32	0.45	£ 920,880	-0.73	0.66	£ 733,625	-1.02	1.12	£ 454,160	-0.77	-1.59
01/03/2020	Richmond upon Thames	£ 1,383,596	0.59	2.72	£ 924,564	0.40	2.59	£ 734,179	0.08	2.31	£ 453,919	-0.05	0.09
01/04/2020	Richmond upon Thames	£ 1,418,635	2.53	6.76	£ 938,085	1.46	5.44	£ 746,379	1.66	4.94	£ 456,174	0.50	1.88
01/05/2020	Richmond upon Thames	£ 1,464,207	3.21	11.34	£ 971,001	3.51	9.73	£ 771,275	3.34	8.41	£ 469,922	3.01	5.85
01/06/2020	Richmond upon Thames	£ 1,481,378	1.17	10.24	£ 990,927	2.05	9.34	£ 791,017	2.56	8.47	£ 478,239	1.77	5.30
01/07/2020	Richmond upon Thames	£ 1,452,737	-1.93	7.76	£ 980,965	-1.01	7.42	£ 785,990	-0.64	7.14	£ 475,783	-0.51	4.08
01/08/2020	Richmond upon Thames	£ 1,455,933	0.22	7.65	£ 982,896	0.20	7.21	£ 788,565	0.33	7.20	£ 473,283	-0.53	3.58
01/09/2020	Richmond upon Thames	£ 1,469,035	0.90	9.82	£ 987,465	0.46	9.33	£ 790,210	0.21	8.85	£ 472,205	-0.23	4.90
01/10/2020	Richmond upon Thames	£ 1,465,788	-0.22	9.50	£ 983,665	-0.38	9.00	£ 789,956	-0.03	9.63	£ 468,504	-0.78	4.78

Appendix 11

Private Rental Market Statistics

Publication Date:



To access data tables, select the table headings or tabs.

			Studio				
LA Code ¹	Area Code ¹	Area	Count of rents	Mean	Lower quartile	Median	Upper quartile
5810	E09000027	Richmond upon Thame	50	983	850	950	1,100
			One Bedroom				
LA Code ¹	Area Code ¹	Area	Count of rents	Mean	Lower quartile	Median	Upper quartile
5810	E09000027	Richmond upon Thame	420	1,281	1,150	1,250	1,400
			Two Bedrooms				
LA Code ¹	Area Code ¹	Area	Count of rents	Mean	Lower quartile	Median	Upper quartile
5810	E09000027	Richmond upon Thame	810	1,692	1,450	1,600	1,850
			Three Bedrooms				
LA Code ¹	Area Code ¹	Area	Count of rents	Mean	Lower quartile	Median	Upper quartile
5810	E09000027	Richmond upon Thame	340	2,238	1,695	2,000	2,600
			Four or more Bedrooms				
LA Code ¹	Area Code ¹	Area	Count of rents	Mean	Lower quartile	Median	Upper quartile
5810	E09000027	Richmond upon Thame	210	3,942	2,750	3,500	4,250

Appendix 12

Application for Planning Permission. Town and Country Planning Act 1990

Publication of applications on planning authority websites.

Please note that the information provided on this application form and in supporting documents may be published on the Authority's website. If you require any further clarification, please contact the Authority's planning department.

1. Applicant Name, Address and Contact Details

Title: First name: Surname:

Company name:

Street address:

Town/City:

County:

Country:

Postcode:

Telephone number: Country Code: National Number: Extension Number:

Mobile number:

Fax number:

Email address:

Are you an agent acting on behalf of the applicant? Yes No

2. Agent Name, Address and Contact Details

Title: First Name: Surname:

Company name:

Street address:

Town/City:

County:

Country:

Postcode:

Telephone number: Country Code: National Number: Extension Number:

Mobile number:

Fax number:

Email address:

3. Description of the Proposal

Please describe the proposed development including any change of use:

Has the building, work or change of use already started? Yes No

4. Site Address Details

Full postal address of the site (including full postcode where available)

House: Suffix:

House name:

Street address:

Town/City:

County:

Postcode:

Description of location or a grid reference
(must be completed if postcode is not known):

Easting:

Northing:

Description:

5. Pre-application Advice

Has assistance or prior advice been sought from the local authority about this application? Yes No

If Yes, please complete the following information about the advice you were given (this will help the authority to deal with this application more efficiently):

Officer name:

Title: First name: Surname:

Reference:

Date (DD/MM/YYYY): (Must be pre-application submission)

Details of the pre-application advice received:

6. Pedestrian and Vehicle Access, Roads and Rights of Way

Is a new or altered vehicle access proposed to or from the public highway? Yes No

Is a new or altered pedestrian access proposed to or from the public highway? Yes No

Are there any new public roads to be provided within the site? Yes No

Are there any new public rights of way to be provided within or adjacent to the site? Yes No

Do the proposals require any diversions/extinguishments and/or creation of rights of way? Yes No

If you answered Yes to any of the above questions, please show details on your plans/drawings and state the reference of the plan(s)/drawings(s)

7. Waste Storage and Collection

Do the plans incorporate areas to store and aid the collection of waste? Yes No

If Yes, please provide details:

Have arrangements been made for the separate storage and collection of recyclable waste? Yes No

If Yes, please provide details:

8. Authority Employee/Member

With respect to the Authority, I am:

- (a) a member of staff
- (b) an elected member
- (c) related to a member of staff
- (d) related to an elected member

Do any of these statements apply to you? Yes No

9. Materials

Please state what materials (including type, colour and name) are to be used externally (if applicable):

9. (Materials continued)

Others - description:

Type of other material:

Description of *existing* materials and finishes:

Please refer to the supporting Design and Access Statement and Drawings.

Description of *proposed* materials and finishes:

Please refer to the supporting Design and Access Statement and Drawings.

Are you supplying additional information on submitted plan(s)/drawing(s)/design and access statement?

Yes No

10. Vehicle Parking

Please provide information on the existing and proposed number of on-site parking spaces:

Type of vehicle	Existing number of spaces	Total proposed (including spaces retained)	Difference in spaces
Cars	0	0	0
Light goods vehicles/public carrier vehicles	0	0	0
Motorcycles	0	0	0
Disability spaces	0	0	0
Cycle spaces	0	9	9
Other (e.g. Bus)	0	0	0
Short description of Other			

11. Foul Sewage

Please state how foul sewage is to be disposed of:

Mains sewer Package treatment plant Unknown
Septic tank Cess pit

Other

Are you proposing to connect to the existing drainage system?

Yes No Unknown

12. Assessment of Flood Risk

Is the site within an area at risk of flooding? (Refer to the Environment Agency's Flood Map showing flood zones 2 and 3 and consult Environment Agency standing advice and your local planning authority requirements for information as necessary.)

Yes No

If Yes, you will need to submit an appropriate flood risk assessment to consider the risk to the proposed site.

Is your proposal within 20 metres of a watercourse (e.g. river, stream or beck)?

Yes No

Will the proposal increase the flood risk elsewhere?

Yes No

How will surface water be disposed of?

Sustainable drainage system Main sewer Pond/lake
 Soakaway Existing watercourse

13. Biodiversity and Geological Conservation

To assist in answering the following questions refer to the guidance notes for further information on when there is a reasonable likelihood that any important biodiversity or geological conservation features may be present or nearby and whether they are likely to be affected by your proposals.

Having referred to the guidance notes, is there a reasonable likelihood of the following being affected adversely or conserved and enhanced within the application site, OR on land adjacent to or near the application site:

a) Protected and priority species

Yes, on the development site Yes, on land adjacent to or near the proposed development No

b) Designated sites, important habitats or other biodiversity features

Yes, on the development site Yes, on land adjacent to or near the proposed development No

c) Features of geological conservation importance

Yes, on the development site Yes, on land adjacent to or near the proposed development No

14. Existing Use

Please describe the current use of the site:

Existing workshop (Use Class B1) and residential (Use Class C3).

Is the site currently vacant? Yes No

If Yes, please describe the last use of the site:

Partially vacant - Existing workshop.

When did this use end (if known) (DD/MM/YYYY)?

Does the proposal involve any of the following?

If yes, you will need to submit an appropriate contamination assessment with your application.

Land which is known to be contaminated? Yes No

Land where contamination is suspected for all or part of the site? Yes No

A proposed use that would be particularly vulnerable to the presence of contamination? Yes No

15. Trees and Hedges

Are there trees or hedges on the proposed development site? Yes No

And/or: Are there trees or hedges on land adjacent to the proposed development site that could influence the development or might be important as part of the local landscape character? Yes No

If Yes to either or both of the above, you may need to provide a full Tree Survey, at the discretion of your local planning authority. If a Tree Survey is required, this and the accompanying plan should be submitted alongside your application. Your local planning authority should make clear on its website what the survey should contain, in accordance with the current 'BS5837: Trees in relation to design, demolition and construction - Recommendations'.

16. Trade Effluent

Does the proposal involve the need to dispose of trade effluents or waste? Yes No

17. Residential Units

Does your proposal include the gain or loss of residential units? Yes No

Market Housing - Proposed

	Number of bedrooms				
	1	2	3	4+	Unknown
Houses					
Flats/Maisonettes	2	4			
Live-Work units					
Cluster flats					
Sheltered housing					
Bedsit/Studios					
Unknown					

Proposed Market Housing Total

Market Housing - Existing

	Number of bedrooms				
	1	2	3	4+	Unknown
Houses					
Flats/Maisonettes	7				
Live-Work units					
Cluster flats					
Sheltered housing					
Bedsit/Studios					
Unknown					

Existing Market Housing Total

Overall Residential Unit Totals

Total proposed residential units	6
Total existing residential units	7

18. All Types of Development: Non-residential Floorspace

Does your proposal involve the loss, gain or change of use of non-residential floorspace? Yes No

Use class/type of use	Existing gross internal floorspace (square metres)	Gross internal floorspace to be lost by change of use or demolition (square metres)	Total gross new internal floorspace proposed (including changes of use) (square metres)	Net additional gross internal floorspace following development (square metres)
A1 Shops Net Tradable Area	0.0	0.0	0.0	0.0
A2 Financial and professional services	0.0	0.0	0.0	0.0
A3 Restaurants and cafes	0.0	0.0	0.0	0.0
A4 Drinking establishments	0.0	0.0	0.0	0.0
A5 Hot food takeaways	0.0	0.0	0.0	0.0
B1 (a) Office (other than A2)	0.0	0.0	0.0	0.0
B1 (b) Research and development	0.0	0.0	0.0	536

18. All Types of Development: Non-residential Floorspace (continued)

B1 (c)	Light industrial	40.0	0.0	55.0	55.0
B2	General industrial	0.0	0.0	0.0	0.0
B8	Storage or distribution	0.0	0.0	0.0	0.0
C1	Hotels and halls of residence	0.0	0.0	0.0	0.0
C2	Residential institutions	0.0	0.0	0.0	0.0
D1	Non-residential institutions	0.0	0.0	0.0	0.0
D2	Assembly and leisure	0.0	0.0	0.0	0.0
Other	Please Specify	0.0	0.0	0.0	0.0
	Total	40.0	0.0	55.0	55.0

For hotels, residential institutions and hostels, please additionally indicate the loss or gain of rooms:

Use Class	Types of use	Existing rooms to be lost by change of use or demolition	Total rooms proposed (including changes of use)	Net additional rooms
-----------	--------------	--	---	----------------------

19. Employment

If known, please complete the following information regarding employees:

	Full-time	Part-time	Equivalent number of full-time
Existing employees	0	0	0
Proposed employees	0	0	0

20. Hours of Opening

If known, please state the hours of opening (e.g. 15:30) for each non-residential use proposed:

Use	Monday to Friday		Saturday		Sunday and Bank Holidays		Not Known
	Start Time	End Time	Start Time	End Time	Start Time	End Time	

21. Site Area

What is the site area?

393	sq.metres
-----	-----------

22. Industrial or Commercial Processes and Machinery

Please describe the activities and processes which would be carried out on the site and the end products including plant, ventilation or air conditioning. Please include the type of machinery which may be installed on site:

n/a.

Is the proposal for a waste management development?

Yes No

23. Hazardous Substances

Is any hazardous waste involved in the proposal?

Yes No

24. Site Visit

Can the site be seen from a public road, public footpath, bridleway or other public land?

Yes No

If the planning authority needs to make an appointment to carry out a site visit, whom should they contact? (Please select only one)

The agent The applicant Other person

25. Certificates (Certificate B)

Certificate of Ownership - Certificate B

Town and Country Planning (Development Management Procedure) (England) Order 2010 Certificate under Article 12

I certify/ The applicant certifies that I have/the applicant has given the requisite notice to everyone else (as listed below) who, on the day 21 days before the date of this application, was the owner (*owner is a person with a freehold interest or leasehold interest with at least 7 years left to run*) and/or agricultural tenant ("*agricultural tenant*" has the meaning given in section 65(8) of the Town and Country Planning Act 1990) of any part of the land or building to which this application relates.

25. Certificates (Certificate B - continued)

Owner/Agricultural Tenant		Date notice served
Name	-	<div style="border: 1px solid black; padding: 5px; text-align: center;">16/07/2014</div>
Number:	<input type="text"/> Suffix: <input type="text"/> House name: <input type="text"/>	
Street:	Please refer to Attached List	
Locality:	-	
Town:	-	
Postcode:	-	
Title:	<input type="text"/> Mr <input type="text"/> First name: <input type="text"/> James <input type="text"/> Surname: <input type="text"/> Lloyd <input type="text"/>	
Person role:	<input type="text"/> Agent <input type="text"/> Declaration date: <input type="text"/> 16/07/2014 <input checked="" type="checkbox"/> Declaration made	

26. Declaration

I/we hereby apply for planning permission/consent as described in this form and the accompanying plans/drawings and additional information. I/we confirm that, to the best of my/our knowledge, any facts stated are true and accurate and any opinions given are the genuine opinions of the person(s) giving them.

Date 16/07/2014

Appendix 13

Decision Date	Expiry Date	Start Date	Site Status	Tenure	ADDRESS	PostCode	Units Existing	Units Proposed	Net Dwellings
17/02/2020	18/02/2020		03. Not Started	Open Market	347 Upper Richmond Road WestEast SheenLondonSW14 8RH	SW14 8RH	0	2	2
24/04/2017	24/04/2020		03. Not Started	Open Market	Teddington Garden CentreStation RoadTeddingtonTW11 9AA	TW11 9AA	0	1	1
11/05/2017	11/05/2020		03. Not Started	Open Market	48 Sixth Cross Road Twickenham TW2 5PD		1	3	2
26/05/2017	26/05/2020		03. Not Started	Open Market	DownlandsPetersham ClosePetershamRichmondTW10 7DZ	TW10 7DZ	1	1	0
31/05/2017	31/05/2020		03. Not Started	Open Market	108 Sherland Road Twickenham	TW1 4HD	0	1	1
27/06/2017	27/06/2020	02/06/2020	03. Not Started	Open Market	24 Christchurch RoadEast SheenLondonSW14 7AA	SW14 7AA	0	1	1
11/07/2017	11/07/2020		03. Not Started	Open Market	257 Waldegrave RoadTwickenhamTW1 4SY	TW1 4SY	1	1	0
09/08/2017	09/08/2020	01/06/2020	03. Not Started	Open Market	The Coach House 273A Sandycombe Road Richmond TW9 3LU	TW9 3LU	0	5	5
30/08/2017	30/08/2020		03. Not Started	Open Market	West House 108 And East House 109South Worple WayEast SheenLondon	SW14 8ND	0	3	3
31/08/2017	31/08/2020		03. Not Started	Open Market	49 Manor RoadRichmondTW9 1YA	TW9 1YA	1	2	1
05/09/2017	05/09/2020		03. Not Started	Open Market	Police Station60 - 68 Station RoadHampton	TW12 2AX	0	28	28
08/09/2017	08/09/2020		03. Not Started	Open Market	246 Upper Richmond Road WestEast SheenLondonSW14 8AG	SW14 8AG	0	1	1
27/09/2017	27/09/2020		03. Not Started	Open Market	First Floor Flat18 Percival RoadEast SheenLondonSW14 7QE	SW14 7QE	2	1	-1
27/10/2017	27/10/2020		03. Not Started	Open Market	Land Junction Of North Worple Way And Wrights Walk Rear Of 31 Alder Road, Mortlake	SW14	0	1	1
03/11/2017	03/11/2020		03. Not Started	Open Market	Unit 1Plough LaneTeddington	TW11	0	1	1
01/12/2017	01/12/2020		03. Not Started	Open Market	25 Cedar AvenueTwickenhamTW2 7HD	TW2 7HD	1	2	1
11/12/2017	11/12/2020		03. Not Started	Open Market	25 Church RoadTeddingtonTW11 8PF	TW11 8PF	0	2	2
20/12/2017	20/12/2020		03. Not Started	Open Market	4A New BroadwayHampton HillHamptonTW12 1JG	TW12 1JG	1	4	3
22/12/2017	22/12/2020		03. Not Started	Open Market	1A St Leonards RoadEast SheenLondonSW14 7LY	SW14 7LY	0	6	6
28/12/2017	28/12/2020		03. Not Started	Open Market	35A Broad StreetTeddingtonTW11 8QZ	TW11 8QZ	1	1	0
17/11/2017	08/01/2021		03. Not Started	Open Market	High Wigsell	TW11	0	1	1
15/01/2018	15/01/2021		03. Not Started	Open Market	Lestock House73B CastelnauBarnesLondonSW13 9RT	SW13 9RT	1	1	0
19/01/2018	19/01/2021		03. Not Started	Open Market	2-4 Heath RoadTwickenhamTW1 4BZ	TW1 4BZ	0	2	2
25/01/2018	25/01/2021		03. Not Started	Open Market	3 Berwyn RoadRichmondTW10 5BP	TW10 5BP	1	1	0
25/01/2018	25/01/2021		03. Not Started	Open Market	Cliveden HouseVictoria VillasRichmondTW9 2JX	TW9 2JX	0	3	3
01/02/2018	02/02/2021		03. Not Started	Open Market	91 Stanley RoadTeddingtonTW11 8UB	TW11 8UB	1	0	-1
05/02/2018	05/02/2021		03. Not Started	Open Market	25 Church RoadTeddingtonTW11 8PF	TW11 8PF	0	1	1
09/03/2018	09/03/2021		03. Not Started	Open Market	First To Third Floors2 The SquareRichmond	TW9 1DY	0	1	1
11/12/2017	14/03/2021	01/06/2020	03. Not Started	Open Market	4 Warwick CloseHamptonTW12 2TY	TW12 2TY	1	3	2
15/03/2018	15/03/2021	04/05/2020	03. Not Started	Open Market	4 Church StreetTwickenhamTW1 3NJ	TW1 3NJ	0	1	1
23/03/2018	23/03/2021		03. Not Started	Open Market	67 - 69 Barnes High StreetBarnesLondon	SW13 9LD	3	7	4
30/05/2017	16/04/2021		03. Not Started	Open Market	Garages Rear Of 8Atbara RoadTeddington	TW11	0	2	2
23/04/2018	23/04/2021		03. Not Started	Open Market	45 - 49 Station RoadHamptonTW12 2BT	TW12 2BT	0	6	6
26/04/2018	26/04/2021		03. Not Started	Open Market	34 Courtlands AvenueHamptonTW12 3NT	TW12 3NT	1	1	0
10/05/2018	10/05/2021		03. Not Started	Open Market	286 Kew RoadKewRichmondTW9 3DU	TW9 3DU	0	1	1
17/04/2018	17/05/2021		03. Not Started	Open Market	1 High StreetHampton Hill	TW12 1NA	0	2	2
22/05/2018	22/05/2021		03. Not Started	Open Market	21A St Leonards RoadEast SheenLondonSW14 7LY	SW14 7LY	0	5	5
19/09/2017	23/05/2021		03. Not Started	Open Market	Lockcorp House 75 Norcutt RoadTwickenhamTW2 6SR	TW2 6SR	0	9	9
31/05/2018	31/05/2021		03. Not Started	Open Market	63 - 71 High StreetHampton Hill	TW12 1NH	3	41	38
31/05/2018	31/05/2021		03. Not Started	Open Market	36 Sunnyside RoadTeddingtonTW11 0RT	TW11 0RT	1	1	0
27/09/2017	07/06/2021		03. Not Started	Open Market	Unit 3 Plough Lane Teddington	TW11 9BN	0	1	1
27/09/2017	07/06/2021		03. Not Started	Open Market	Unit 4 To 5APlough LaneTeddington	TW11 9BN	0	2	2
12/06/2018	12/06/2021		03. Not Started	Open Market	Willoughby House439 Richmond RoadTwickenhamTW1 2AG	TW1 2AG	0	4	4
03/07/2018	03/07/2021		03. Not Started	Open Market	1E Colonial Avenue Twickenham TW2 7EE	TW2 7EE	0	1	1
09/07/2018	09/07/2021		03. Not Started	Open Market	The FirsChurch GroveHampton WickKingston Upon ThamesKT1 4AL	KT1 4AL	1	9	8
19/07/2018	19/07/2021		03. Not Started	Open Market	Shanklin House70 Sheen RoadRichmondTW9 1UF	TW9 1UF	0	2	2
26/07/2018	26/07/2021		03. Not Started	Open Market	Garages Rear Of 48-52Anlaby RoadTeddington	TW11 0PP	0	2	2
10/08/2018	10/08/2021		03. Not Started	Open Market	32 Albion RoadTwickenhamTW2 6QJ	TW2 6QJ	1	1	0
22/08/2018	22/08/2021	15/09/2020	03. Not Started	Open Market	179 - 181 High StreetHampton Hill	TW12	3	10	7
14/09/2018	14/09/2021		03. Not Started	Open Market	4 Udney Park RoadTeddingtonTW11 9BG	TW11 9BG	0	3	3
03/10/2018	03/10/2021		03. Not Started	Open Market	Land To Rear Of 34 - 40 The Quadrant Richmond	TW9 1DN	0	2	2
04/10/2018	04/10/2021	23/06/2020	03. Not Started	Open Market	3 Queens RiseRichmondTW10 6HL	TW10 6HL	1	1	0

Decision Date	Expiry Date	Start Date	Site Status	Tenure	ADDRESS	PostCode	Units Existing	Units Proposed	Net Dwellings
08/10/2018	08/10/2021		03. Not Started	Open Market	561 - 563 Upper Richmond Road WestEast SheenLondonSW14 7ED	SW14 7ED	0	3	3
30/10/2018	30/10/2021		03. Not Started	Open Market	Garage Site Marys TerraceTwickenhamTW1 3JB	TW1 3JB	0	2	2
05/11/2018	06/11/2021		03. Not Started	Open Market	422 Upper Richmond Road WestEast SheenLondon	TW10 5DY	1	5	4
12/11/2018	12/11/2021		03. Not Started	Open Market	75 Sheen LaneEast SheenLondonSW14 8AD	SW14 8AD	0	1	1
27/11/2018	27/11/2021		03. Not Started	Open Market	Elmfield HouseHigh StreetTeddingtonTW11 8EW	TW11 8EW	1	0	-1
11/12/2018	11/12/2021		03. Not Started	Open Market	74 Copthall GardensTwickenhamTW1 4HJ	TW1 4HJ	0	1	1
18/12/2018	18/12/2021		03. Not Started	Open Market	18 Cedar HeightsPetershamRichmondTW10 7AE	TW10 7AE	1	1	0
12/10/2018	20/12/2021		03. Not Started	Open Market	168 Broom RoadTeddingtonTW11 9PQ	TW11 9PQ	0	1	1
21/12/2018	21/12/2021		03. Not Started	Open Market	Land Adjacent To 93 Elm Bank Gardens Barnes	SW13 ONX	0	1	1
21/12/2018	21/12/2021		03. Not Started	Open Market	1 Trinity RoadRichmondTW9 2LD	TW9 2LD	1	2	1
26/03/2020	21/12/2021		03. Not Started	Open Market	2 Belgrave RoadBarnesLondonSW13 9NS	SW13 9NS	1	1	0
28/12/2018	28/12/2021		03. Not Started	Open Market	108 Shacklegate LaneTeddingtonTW11 8SH	TW11 8SH	0	1	1
07/01/2019	07/01/2022		03. Not Started	Open Market	Land Rear Of48 Fourth Cross RoadTwickenham	TW2 5ER	0	1	1
14/01/2019	14/01/2022		03. Not Started	Open Market	8 Atbara RoadTeddingtonTW11 9PD	TW11 9PD	1	1	0
04/02/2019	04/02/2022		03. Not Started	Open Market	21A St Leonards RoadEast SheenLondonSW14 7LY		0	3	3
06/02/2019	06/02/2022		03. Not Started	Open Market	85 Connaught RoadTeddingtonTW11 0QQ	TW11 0QQ	2	4	2
08/02/2019	08/02/2022		03. Not Started	Open Market	192 Heath RoadTwickenhamTW2 5TX	TW2 5TX	0	1	1
12/02/2019	12/02/2022		03. Not Started	Open Market	33 Parke RoadBarnesLondonSW13 9NJ	SW13 9NJ	1	1	0
26/02/2019	26/02/2022		03. Not Started	Open Market	20A Red Lion StreetRichmondTW9 1RW	TW9 1RW	1	2	1
18/03/2019	18/03/2022		03. Not Started	Open Market	74 Lowther RoadBarnesLondonSW13 9NU	SW13 9NU	1	1	0
30/11/2018	19/03/2022		03. Not Started	Open Market	126 Heath RoadTwickenhamTW1 4BN	TW1 4BN	1	3	2
19/03/2019	19/03/2022		03. Not Started	Open Market	62 Glenthams RoadBarnesLondonSW13 9JJ	SW13 9JJ	0	2	2
29/03/2019	01/04/2022		03. Not Started	Open Market	45 Ormond CrescentHamptonTW12 2TJ	TW12 2TJ	1	1	0
07/05/2019	07/05/2022		03. Not Started	Open Market	203 Sandycombe RoadRichmondTW9 2EW	TW9 2EW	0	1	1
09/05/2019	09/05/2022		03. Not Started	Open Market	The Haven Eel Pie IslandTwickenhamTW1 3DY	TW1 3DY	1	1	0
15/11/2018	14/05/2022		03. Not Started	Open Market	Land Adjacent To No 1South Western RoadTwickenham	TW1 1LG	0	1	1
30/05/2019	20/05/2022		03. Not Started	Open Market	Erection of a one and a half storey, three-bedroom house in the rear garden of 33 (sited to rear of	TW12 2LP	0	1	1
23/05/2019	23/05/2022		03. Not Started	Open Market	15 Friars Stile RoadRichmond	TW10 6NH	2	1	-1
24/05/2019	24/05/2022		03. Not Started	Open Market	391 St Margarets RoadTwickenhamIsleworthTW7 7BZ	TW7 7BZ	0	1	1
24/05/2019	24/05/2022		03. Not Started	Open Market	48 Fourth Cross RoadTwickenhamTW2 5EL	TW2 5EL	1	1	0
05/06/2019	05/06/2022		03. Not Started	Open Market	Unit 1 Hampton Works Rear Of119 Sheen LaneEast SheenLondon		0	1	1
20/06/2019	20/06/2022		03. Not Started	Open Market	All Saints Parish ChurchThe AvenueHamptonTW12 3RG	TW12 3RG	1	5	4
08/07/2019	24/06/2022		03. Not Started	Open Market	20 Sheen Common DriveRichmondTW10 5BN	TW10 5BN	1	1	0
28/06/2019	28/06/2022		03. Not Started	Open Market	173 Kew RoadRichmondTW9 2BB	TW9 2BB	1	2	1
05/11/2019	05/07/2022		03. Not Started	Open Market	115 White Hart LaneBarnesLondonSW13 0JL	SW13 0JL	0	1	1
15/07/2019	15/07/2022		03. Not Started	Affordable Rent	Richmond Royal Hospital (Original Block)Kew Foot RoadRichmondTW9 2TE	TW9 2TE	0	11	11
15/07/2019	15/07/2022		03. Not Started	Intermediate	Richmond Royal Hospital (Original Block)Kew Foot RoadRichmondTW9 2TE	TW9 2TE	0	4	4
15/07/2019	15/07/2022		03. Not Started	Open Market	Richmond Royal Hospital (Original Block)Kew Foot RoadRichmondTW9 2TE	TW9 2TE	0	56	56
15/07/2019	15/07/2022		03. Not Started	Open Market	106 Shacklegate LaneTeddingtonTW11 8SH	TW11 8SH	0	1	1
16/07/2019	16/07/2022	17/06/2020	03. Not Started	Open Market	2F Fifth Cross RoadTwickenhamTW2 5LQ	TW2 5LQ	1	2	1
16/07/2019	16/07/2022		03. Not Started	Open Market	57B York StreetTwickenhamTW1 3LP	TW1 3LP	0	1	1
25/07/2019	25/07/2022		03. Not Started	Open Market	34 And 36 Taylor Close And 177 High Street Hampton Hill	TW12 1LF	2	3	1
25/07/2019	25/07/2022		03. Not Started	Open Market	Garage SiteRosslyn Avenue/Treen AvenueBarnesLondonSW13 0JT	SW13 0JT	0	1	1
13/08/2019	13/08/2022		03. Not Started	Affordable Rent	Garages Site ABucklands RoadTeddington	TW11	0	5	5
13/08/2019	13/08/2022		03. Not Started	Affordable Rent	Garage Site BBucklands RoadTeddington	TW11	0	2	2
21/08/2019	21/08/2022		03. Not Started	Open Market	17A Tower RoadTwickenhamTW1 4PD	TW1 4PD	1	1	0
23/08/2019	27/08/2022		03. Not Started	Open Market	190 Sheen LaneEast SheenLondonSW14 8LF	SW14 8LF	1	0	-1
21/08/2019	27/08/2022		03. Not Started	Open Market	Tabard House22 Upper Teddington RoadHampton WickKT1 4DT	KT1 4DT	0	1	1
29/08/2019	29/08/2022		03. Not Started	Open Market	1A - 3A Holly RoadHampton HillHamptonTW12 1QF	TW12 1QF	0	1	1
09/09/2019	16/09/2022		03. Not Started	Open Market	85 Connaught RoadTeddingtonTW11 0QQ	TW11 0QQ	2	5	3
17/09/2019	17/09/2022		03. Not Started	Open Market	67 Park RoadHampton HillTW12 1HU	TW12 1HU	1	2	1
23/09/2019	23/09/2022		03. Not Started	Open Market	44 Nassau RoadBarnesLondonSW13 9QE	SW13 9QE	2	1	-1

Decision Date	Expiry Date	Start Date	Site Status	Tenure	ADDRESS	PostCode	Units Existing	Units Proposed	Net Dwellings
23/09/2019	23/09/2022		03. Not Started	Open Market	Garages AtCraneford WayTwickenham	TW2 7SQ	0	2	2
23/09/2019	23/09/2022		03. Not Started	Open Market	102 - 104 Kew RoadRichmondTW9 2PQ	TW9 2PQ	0	7	7
17/10/2019	17/10/2022		03. Not Started	Open Market	38 Langham RoadTeddingtonTW11 9HQ	TW11 9HQ	0	1	1
23/10/2019	23/10/2022		03. Not Started	Open Market	321 Richmond RoadKingston Upon ThamesKT2 5QU	KT2 5QU	1	1	0
07/11/2019	07/11/2022		03. Not Started	Open Market	A1 - A3 KingswayOldfield RoadHamptonTW12 2HD	TW12 2HE	0	6	6
11/11/2019	11/11/2022	14/04/2020	03. Not Started	Open Market	2 West Park AvenueKewRichmondTW9 4AL	TW9 4AL	1	1	0
18/11/2019	18/11/2022		03. Not Started	Open Market	Unit 4Princes WorksPrinces RoadTeddingtonTW11 0RW	TW11 0RW	0	1	1
05/12/2019	05/12/2022		03. Not Started	Open Market	Ajanta 13 Walpole GardensTwickenhamTW2 5SL	TW2 5SL	0	1	1
11/12/2019	11/12/2022		03. Not Started	Open Market	21 Sunbury AvenueEast SheenLondonSW14 8RA	SW14 8RA	1	1	0
23/12/2019	23/12/2022		03. Not Started	Open Market	Old Farm Stables FlatOak AvenueHamptonTW12 3QD	TW12 3QD	0	1	1
23/12/2019	24/12/2022		03. Not Started	Open Market	8 St Albans GardensTeddingtonTW11 8AE	TW11 8AE	1	1	0
12/08/2019	27/12/2022		03. Not Started	Open Market	216 Hampton RoadTwickenhamTW2 5NJ	TW2 5NJ	1	2	1
22/01/2020	23/01/2023		03. Not Started	Open Market	56 - 58 Harvey RoadWhitton	TW4 5LU	0	2	2
29/01/2020	29/01/2023		03. Not Started	Open Market	Jasmine Studios 8 Oak LaneTwickenhamTW1 3PA	TW1 3PA	5	5	0
31/01/2020	03/02/2023		03. Not Started	Open Market	2A And 5South AvenueKew	TW9 3EL	0	1	1
17/01/2020	05/02/2023		03. Not Started	Open Market	Wick House, 10 Station Road, Hampton Wick, KT1 4HF	KT2 4HF	0	2	2
20/02/2020	20/02/2023		03. Not Started	Open Market	26-28 Priests BridgeEast SheenLondonSW14 8TA	SW14 8TA	0	7	7
05/03/2020	05/03/2023		03. Not Started	Open Market	51 Kew RoadRichmondTW9 2NQ	TW9 2NQ	1	2	1
11/03/2020	11/03/2023		03. Not Started	Open Market	8 Sandy LanePetershamRichmondTW10 7EN	TW10 7EN	1	1	0
20/03/2020	20/03/2023		03. Not Started	Open Market	82 - 84 Hill RiseRichmond	TW10 6UB	1	2	1

Appendix 14

Mr Marlon Deam
DP9 Ltd
100 Pall Mall
London
SW1Y 5NQ

Letter Printed 16 September 2020

FOR DECISION DATED
16 September 2020

Dear Sir/Madam

The Town and Country Planning Act 1990, (as amended)
Decision Notice

Application: 18/3310/FUL
Your ref:
Our ref: DC/NID/18/3310/FUL/FUL
Applicant:
Agent: Mr Marlon Deam

WHEREAS in accordance with the provisions of the Town and Country Planning Act 1990 and the orders made thereunder, you have made an application received on **8 October 2018** and illustrated by plans for the permission of the Local Planning Authority to develop land situated at:

Kew Biothane Plant Melliss Avenue Kew

for

Demolition of existing buildings and structures, and redevelopment of the site to provide a 4-6 storey specialist extra care facility for the elderly with existing health conditions, comprising of 88 units, communal healthcare, therapy, leisure and social facilities (including a Restaurant/bar/cafe and swimming pool). Provision of car and cycle parking, associated landscaping and publicly accessible amenity space including a childrens play area.

NOW THEREFORE WE THE MAYOR AND BURGESSES OF THE LONDON BOROUGH OF RICHMOND UPON THAMES acting by the Council of the said Borough, the Local Planning Authority HEREBY GIVE YOU NOTICE pursuant to the said Act and the Orders made thereunder that permission to develop the said land in accordance with the said application is hereby **GRANTED** subject to the conditions and informatives summarised and listed on the attached schedule.

Yours faithfully

A handwritten signature in black ink, appearing to read 'R. Angus', with a long horizontal flourish extending to the right.

Robert Angus
Head of Development Management

SCHEDULE OF CONDITIONS AND INFORMATIVES FOR APPLICATION 18/3310/FUL

APPLICANT NAME

AGENT NAME

Mr Marlon Deam
100 Pall Mall
London
SW1Y 5NQ

SITE

Kew Biothane Plant Melliss Avenue Kew

PROPOSAL

Demolition of existing buildings and structures, and redevelopment of the site to provide a 4-6 storey specialist extra care facility for the elderly with existing health conditions, comprising of 88 units, communal healthcare, therapy, leisure and social facilities (including a Restaurant/bar/cafe and swimming pool). Provision of car and cycle parking, associated landscaping and publicly accessible amenity space including a childrens play area.

SUMMARY OF CONDITIONS AND INFORMATIVES

CONDITIONS

AT01	Development begun within 3 years
U0079733	Approved drawings
U0079734	Details to specified scale ~~
U0079735	Details - Materials to be approved
U0079736	Details of boundary treatment
GD04A	Restriction-alt's/Ext-Appear'
U0079737	In accordance with Energy Statement
U0079738	BREEAM for Non-Housing
U0079739	PV panel and ASHP details
U0079740	Water Consumption
U0079741	Connection to energy network
U0079742	Contaminated Sites
U0079743	Electric charging facilities
U0079744	Parking allocation
U0079745	Disabled parking
U0079746	Cycle and scooter parking
U0079747	Highway sight lines Pedestrian
RD10A	Gradients of Ramps
DV30	Refuse storage
U0079748	Written Scheme of Investigation
U0079749	Community Toilet Scheme
U0079750	Flood protection
U0079751	Flood Warning and Evacuation Plan
U0079752	Sustainable Drainage System
U0079753	Thames Water - Waste and Water Capacity
U0079754	AMS/Tree protection
U0079755	Tree planting
U0079756	Green/Living roof
U0079757	Ecological Enhancements
U0079758	Hard and Soft Landscaping Required
DV28	External illumination
U0079759	Ventilation Odour Control Condition
U0079760	Restaurant /bar/café
U0079761	Piling
U0079762	Wheelchair user units M4(3)
U0079763	Dust Management Strategy
U0079764	Sound insulation external scheme
U0079765	Demolition/Construction/Logistics Method

U0079767	Noise and Vibration Construction Method
U0079766	Sound insulation internal scheme
U0079769	Delivery, Servicing and Waste strategy
U0079768	Mechanical Services Noise Control
U0079770	Air Quality-NRMM

INFORMATIVES

U0035251	NPPF APPROVAL - Para. 38-42
U0035249	Composite Informative
IL13	Section 106 agreement
U0035253	CIL Liable
U0035259	Community Toilet Scheme
U0036304	Drinking water
U0035463	Construction Method Statement
U0035265	Construction Logistics Plan
U0035262	Short stay drop-off space
U0035257	Cycle Parking Provision
IH08A	Travel Plan
IM09	Disabled parking
IE06	Details of piling-EHO consultation
IM01	Disabled persons
U0035260	Solar PV panels and ASHP details
U0035255	Thames Water
U0035258	EA Informative
U0035261	Flood Warning and Evacuation Plan
U0035263	Archaeology
U0035264	Ecological enhancements
IE03	Restaurant - EHO Consultation
IL02	Advertisements
IM11	Use of hardwoods
U0035450	Fire Statement
IM13	Street numbering
IT06	Nature Conservation
IT05	Trees - Size of new stock
U0035254	Fox trappings

DETAILED CONDITIONS AND INFORMATIVES

DETAILED CONDITIONS

AT01 Development begun within 3 years

The development to which this permission relates must be begun not later than the expiration of three years beginning with the date of this permission.

REASON: To conform with the requirements of Section 91 of the Town and Country Planning Act 1990 as amended by the Planning and Compulsory Purchase Act 2004.

U0079733 Approved drawings

The development hereby permitted shall be carried out in accordance with the following approved plans and documents, where applicable.

PA1.02 rev 1 received 10.10.18
PA1.03 rev 1 received 10.10.18
PA1.04 rev 2 received 18.12.18
PA1.05 rev 1 received 10.10.18

PA2.01 rev 3 received 17.04.19
PA2.02 rev 2 received 06.03.19
PA2.03 rev 2 received 06.03.19
PA2.04 rev 2 received 06.03.19
PA2.05 rev 2 received 06.03.19
PA2.06 rev 3 received 17.04.19
PA2.07 rev 3 received 17.04.19
PA2.08 rev 3 received 17.04.19

PA2.10 rev 1 received 06.03.19
PA2.11 rev 1 received 06.03.19
PA2.12 rev 1 received 06.03.19
PA2.13 rev 1 received 06.03.19
PA2.14 rev 1 received 06.03.19
PA2.15 rev 2 received 17.04.19
PA2.16 rev 2 received 17.04.19
PA2.17 rev 2 received 17.04.19
PA2.18 rev 2 received 17.04.19

PA3.01 rev 1 received 10.10.18
PA3.02 rev 1 received 10.10.18
PA3.03 rev 1 received 10.10.18
PA3.04 rev 3 received 17.04.19
PA3.05 rev 3 received 17.04.19
PA3.06 rev 3 received 17.04.19

PA4.01 rev 1 received 10.10.18
PA4.02 rev 1 received 10.10.18
PA4.03 rev 3 received 17.04.19
PA4.04 rev 3 received 17.04.19
PA4.05 rev 3 received 17.04.19

Waste collection drawing SK_06 rev 1 received 18.12.18
Masterplan 1579-MA-WA-MP-GF-DR-L-001 C dated 02.05.19
Softworks Plan 1579-MA-WA-MP-GF-DR-L-002 C dated 02.05.19
Hardworks Plan 1579-MA-WA-MP-GF-DR-L 003 B dated 02.05.19
Biodiversity Strategy 1579-MA-WA-MP-GF-DR-L-004 B dated 02.05.19
Arboricultural Implications Plan 1579-MA-WA-MP-GF-DR-L-005 C dated 02.05.19
Soiling Plan 1579-MA-WA-MP-GF-DR-L-006 C dated 02.05.19
Tree pit details 1579-MA-WA-MP-GF-DR-L-009 dated 06.03.19

REASON: To accord with the terms of the application, for the avoidance of doubt and in the interests of proper planning.

U0079734 Details to specified scale ~~

The development shall not be carried out other than in accordance with detailed drawings to a scale of not less than 1:20 which shall be submitted to and approved in writing by the Local Planning Authority, such details to show:

- 1) cross section through fenestration showing details, window hoods and reveals;
- 2) porte cochere;
- 3) typical balcony;
- 4) brise soleil;
- 5) privacy screens.

REASON: To ensure that the proposed development is in keeping with the existing building(s) and does not prejudice the appearance of the locality.

U0079735 Details - Materials to be approved

The external surfaces of the building(s) (including fenestration) and, where applicable, all areas of hard surfacing shall not be constructed other than in materials details/samples of which shall be submitted to and approved in writing by the Local Planning Authority. Such details shall include facing brickwork, zinc cladding, bronze finish cladding, privacy screens, fixed louvered cladding, door and window frames, all balustrades, reveals, soffits and doorways.

REASON: To ensure that the proposed development does not prejudice the appearance of the locality.

U0079736 Details of boundary treatment

Prior to the commencement of development above ground floor slab level, details of proposed boundary treatments, to include a plan indicating the positions, design, materials and type of boundary treatment to be erected and any tree protection measures to be taken into consideration including when creating the openings along the river path, shall be submitted to and approved in writing by the Local Planning Authority. The approved boundary treatment shall be carried out prior to occupation of any part of the development and retained as such.

REASON: To safeguard the visual amenities of the locality and the privacy/amenities of the adjoining properties.

GD04A Restriction-alt's/Ext-Appear'

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking or re-enacting that Order) no external alterations or extensions shall be carried out to the building(s) hereby approved.

REASON: To safeguard the appearance of the premises and the area generally.

U0079737 In accordance with Energy Statement

The development shall be built in accordance with the approved Energy Strategy prepared by AECOM Limited (Oct 2018), demonstrating how the development would follow the hierarchy of energy efficiency, decentralised energy and renewable energy technologies to secure at least a minimum of 35% reduction in CO2 emissions below the maximum threshold set in Building Regulations Part L 2013. Evidence (e.g. photographs, copies of installation contracts and as-built worksheets prepared under SAP or the National Calculation Method) should be submitted to the Local Planning Authority and approved in writing within 3 months of first occupation of the building to demonstrate that the development has been carried out in accordance with the approved Energy Strategy unless otherwise agreed by the Local Planning Authority in writing.

REASON: To ensure that the development makes the fullest contribution to minimising carbon dioxide emissions.

U0079738 BREEAM for Non-Housing

1) Within 3 months of work starting on site, unless otherwise agreed in writing, a BREEAM fully fitted New Construction Interim (Design Stage) Certificate, issued by the Building Research Establishment (BRE), must be submitted to and approved in writing by the Local Planning Authority to show that a minimum Excellent rating will be achieved.

2) Within 3 months of first occupation of the building, unless otherwise agreed in writing, a BREEAM fully fitted New Construction Final (Post-Construction) Certificate, issued by the BRE, must be submitted to and approved in writing by the Local Planning Authority to demonstrate that an Excellent rating has been achieved. All the measures integrated shall be retained for as long as the development is in existence.

REASON: In the interests of promoting sustainable forms of developments and to meet the terms of the application.

U0079739 PV panel and ASHP details

Notwithstanding the details as shown on the approved drawings, prior to the commencement of development above ground floor slab level, details of the siting, type and number of Solar Panels and Air Source Heat Pumps to be attached to the roofs of the buildings shall be submitted to and approved in writing by the Local Planning Authority. The photovoltaic panels and Air Source Heat Pumps shall thereafter be installed in strict accordance with the approved details and permanently retained for the as long as the development is in existence.

REASON: In the interests of promoting sustainable forms of developments.

U0079740 Water Consumption

The dwelling(s) hereby approved shall not be occupied other than in accordance with the water consumption targets of 105 litres or less per person per day, and 5 litres or less per head per day for external water use.

Reason: In the interests of water efficiency in accordance with the Local Plan.

U0079741 Connection to energy network

Prior to first occupation, details of measures to be implemented to ensure the development is safeguarded to allow future connection to a decentralised energy network, should one become available, shall be submitted to and approved in writing by the Local Planning Authority. The details shall include:

(a) Confirmation that a communal heating system will be used.

(b) Valved connections will be provided into the primary pipework headers to allow for future connection to the offsite network.

The energy safeguarding measures shall be implemented prior to first occupation of the development and maintained as such thereafter.

REASON: In order to safeguard connection of the development to a future decentralised energy network, and to comply with policies 5.5 and 5.6 of the London Plan

U0079742 Contaminated Sites

None of the dwellings/buildings hereby approved shall be occupied until:

A) the remediation works approved within the remediation strategy (Soiltechnics Site Investigation, Land Contamination Assessment and Remediation Strategy dated October 2018) have been carried out in full and in compliance with the approved strategy. If during the remediation or development work new areas of contamination are encountered, which have not been previously identified, then the additional contamination should be fully assessed in accordance with conditions (aa) and (ab)

below and an adequate remediation scheme shall be submitted to and approved in writing by the local planning authority and fully implemented thereafter.

(aa) an intrusive site investigation shall be carried out comprising: sampling of soil, soil vapour, ground gas, surface water and groundwater to the satisfaction of the local planning authority. Such work to be carried out by suitably qualified and accredited geo-environmental consultants in accordance with the current U.K. requirements for sampling and testing.

(ab) written reports of i) the findings of the above site investigation and ii) a risk assessment for sensitive receptors together with a detailed remediation strategy designed to mitigate the risk posed by the identified contamination to sensitive receptors shall be submitted to and approved in writing by the local planning authority

B) a verification report, produced on completion of the remediation work, has been submitted to and approved in writing by the local planning authority. Such report to include i) details of the remediation works carried out and ii) results of verification sampling, testing and monitoring and iii) all waste management documentation showing the classification of waste, its treatment, movement and disposal in order to demonstrate compliance with the approved remediation strategy.

REASON: To protect future users of the site and the environment.

U0079743 Electric charging facilities

Prior to first occupation of any part of the development approved, at least 6 vehicle parking spaces shall include active charging facilities, and at least 6 vehicle parking spaces shall be reserved for (passive) charging facilities. The active charging facilities shall be installed prior to occupation of any part of the development, in accordance with the manufactures specifications and maintenance schedule and maintained permanently thereafter, unless otherwise approved in writing by the Local Planning Authority.

REASON: To encourage the uptake of electrical vehicles and accord with the requirements of policy 6.13 of the London Plan.

U0079744 Parking allocation

Prior to first occupation of any part of the development hereby approved, the development shall provide 27 vehicles parking spaces in accordance with a car parking management plan to be submitted to and approved in writing by the Local Planning Authority. This should include:

1. Details of the layout of the car park and allocation of 14 spaces to the residential units, 5 spaces to staff, 7 spaces to visitors and 1 space for a minibus vehicle;
2. Details of the controls of means of entry to the car park; and
3. The provision of 20% of car parking spaces with electric charging points, a further 20% with a passive energy supply for future use

Each space shall thereafter be retained for parking purposes in association with its allocation, and for no other purpose, unless otherwise approved in writing by the Local Planning Authority. The drop-off space shall be used for short stay parking purposes, shall be signposted accordingly and shall not be used as an additional long stay space for the site.

REASON: To ensure the development does not prejudice the free flow of traffic and highway and pedestrian safety and to ensure that residential parking is available for each unit within the site to avoid generation of on-street parking.

U0079745 Disabled parking

Prior to first occupation of any part of the development hereby approved, the development shall provide 12 vehicle parking spaces for people with disabilities, as per the approved drawings PA2.02 Rev 2 and shall at no time be used for any other purpose and shall be made permanently available for use by residents with disabilities. 551

REASON: To ensure that people with disabilities can satisfactory and conveniently use the buildings.

U0079746 Cycle and scooter parking

No part of the development shall be occupied until cycle and mobility scooter parking facilities have been provided in accordance with detailed drawings to be submitted to and approved in writing by the Local Planning Authority, such drawings to show the position, design, materials and finishes thereof. Each bicycle and mobility scooter parking space shall thereafter be retained for bicycle and mobility scooter parking purposes as relevant and for no other purpose, unless otherwise approved in writing by the Local Planning Authority.

REASON: To accord with this Council's policy to discourage the use of the car wherever possible.

U0079747 Highway sight lines Pedestrian

Notwithstanding the provisions of the Town and Country Planning (General Permitted Development) (England) Order 2015 (or any Order revoking or re-enacting that Order), no wall, fence, hedge or other obstruction to visibility within any part of the areas defined hereunder which is under the control of applicant shall at any time exceed a height of 0.6m above ground level, as agreed by the Local Planning Authority: one area on each side of the proposed access, defined by:

- i. The adjacent private road.
- ii. The edge of the proposed vehicular access.
- iii. A line joining a point 2.4m from the intersection of the road boundary, with a point 2.1m from that intersection measured along the edge of the proposed access

REASON: To provide a suitable standard of visibility to and from the highway so that the use of the access does not prejudice the safety of pedestrians in the vicinity of the access.

RD10A Gradients of Ramps

The gradient of any ramp shall not exceed 1 in 10 and for the first 5m from the edge of the carriageway of the adjoining highway, shall not exceed 1 in 25.

REASON: In the interests of highway safety.

DV30 Refuse storage

No refuse or waste material of any description shall be left or stored anywhere on the site other than within a building or refuse enclosure.

REASON: To safeguard the appearance of the property and the amenities of the area.

U0079748 Written Scheme of Investigation

No demolition or development shall take place until a stage 1 written scheme of investigation (WSI) has been submitted to and approved by the local planning authority in writing. For land that is included within the WSI, no demolition or development shall take place other than in accordance with the agreed WSI, and the programme and methodology of site evaluation and the nomination of a competent person(s) or organisation to undertake the agreed works.

If heritage assets of archaeological interest are identified by stage 1 then for those parts of the site which have archaeological interest a stage 2 WSI shall be submitted to and approved by the local planning authority in writing. For land that is included within the stage 2 WSI, no demolition/development shall take place other than in accordance with the agreed stage 2 WSI which shall include:

A. The statement of significance and research objectives, the programme and methodology of site investigation and recording and the nomination of a competent person(s) or organisation to undertake the agreed works

B. The programme for post-investigation assessment and subsequent analysis, publication & dissemination and deposition of resulting material. this part of the condition shall not be discharged until these elements have been fulfilled in accordance with the programme set out in the stage 2 WSI.

REASON: To protect archaeology

U0079749 Community Toilet Scheme

Prior to the first occupation of the development, the owner shall sign up to the Community Toilet Scheme, or any other equivalent scheme that may replace the community Toilet Scheme, and the toilets associated with the approved restaurant/café shall be made permanently available to the public during the opening hours of the restaurant/café and remain as such for the life of the development.

REASON: To ensure that the proposed development contributes to a healthy environment, that promotes wellbeing and healthy lifestyles for all.

U0079750 Flood protection

The development permitted by this planning permission shall be carried out in accordance with the approved Flood Risk Assessment (FRA) referenced 3859 Melliss Avenue, Flood Risk Assessment, Red & Yellow Specialist Extra Care, dated October 2018 and the following mitigation measures detailed within the FRA:

1. First Floor finished floor levels shall be set no lower than 6.09m AOD (TE2100 Breach Level)
2. The flood resilient and resistance measures outlined shall be fully implemented and be set at 300mm above the finished floor level.

The mitigation measures shall be fully implemented prior to occupation and subsequently in accordance with the timing / phasing arrangements embodied within the scheme, or within any other period as may subsequently be agreed, in writing, by the local planning authority.

REASON: To reduce the risk of flooding to the proposed development and future occupants.

U0079751 Flood Warning and Evacuation Plan

Prior to the occupation of the development hereby approved:

(A) Written notification shall be submitted to the Local Planning Authority confirming the development has signed up to the EA Flood Warning Service 'Flood Line'

(B) A flooding response / evacuation plan for all parts of the development (ground level communal and care facilities and extra care units) shall be submitted to and approved in writing by the Local Planning Authority. The development shall not be used / occupied other than in accordance with the approved plan.

REASON: To minimise the risk from flooding

U0079752 Sustainable Drainage System

1. The development hereby approved shall be implemented in accordance with the SuDS Statement dated October 2018 for Red & Yellow Specialist Extra Care Drainage Strategy including the installation of the attenuation storage tanks to achieve the greenfield runoff rate for the site as identified in the approved document.

2. Prior to the occupation of the development hereby approved, details of the proposed management and maintenance regime for the SUDS elements for the lifetime of the development shall be submitted to and approved in writing by the Local Planning Authority. The SUDS system shall be maintained with the approved management regime.

REASON: In the interest of sustainable construction, to avoid excessive surface water runoff and to ensure that the surface water drainage system does not pollute the ground water below the site.

U0079753 Thames Water - Waste and Water Capacity

The Extra Care Facility shall not be occupied until confirmation has been provided to the local planning authority that either:

- all water network upgrades required to accommodate the additional flows from the development have been completed; or
- a housing and infrastructure phasing plan has been agreed with Thames Water to allow additional properties to be occupied. Where a housing and infrastructure phasing plan is agreed no occupation shall take place other than in accordance with the agreed housing and infrastructure phasing plan.

REASON: The development may lead to flooding and network reinforcement works are anticipated to be necessary to ensure that sufficient capacity is made available to accommodate additional flows and demand anticipated from the new development. Any necessary reinforcement works will be necessary to avoid sewer flooding and/or potential pollution incidents.

U0079754 AMS/Tree protection

Prior to the commencement of development, an Arboricultural Method Statement (AMS), shall be submitted to and approved in writing by the Local Planning Authority. The AMS must:

- (A) Be written in accordance with and address sections 5.5, 6.1, 6.2, 6.3 and 7 of British Standard 5837:2012 Trees in relation to design, demolition and construction - recommendations
- (B) Be written in conjunction with the schemes specific method of construction (where applicable)
- (C) Outline any tree constraints, and explain any impacts for both above and below ground.
- (D) Detail all tree protection (including plans) for retained trees on the site and adjacent land during site preparation, demolition, construction, landscaping, and other operations on the site including erection of hoardings, site cabins, or other temporary structures
- (E) Detail any special engineering for construction within the Root Protection Area.
- (F) Detail any facilitation pruning that may be required. The specification for tying back and/or pruning must be measurable and prepared by a suitably qualified Arboriculturist or Arboricultural Contractor. All tree work must be undertaken in accordance with BS3998:2010 Tree work - Recommendations unless approved by the Councils Arboricultural Officer
- (G) Provide confirmation of the appointment of an Arboricultural Consultant for the duration of the development and a schedule of inspections to achieve an auditable monitoring and supervision programme, and a timetable for submission to the Local Planning Authority.

The development shall not be implemented other than in accordance with the approved AMS.

REASON: To ensure that the tree (s) are not damaged or otherwise adversely affected by building operations and soil compaction

U0079755 Tree planting

1. Prior to the occupation of the development hereby approved, a tree planting scheme shall be submitted to and approved in writing by the local planning authority. This scheme shall be written in accordance with the British Standard 5837:2012 Trees in relation to design, demolition and construction - Recommendations (sections 5.6) and BS 8545:2014 Trees: from nursery to independence in the landscape.

Recommendations, and include:

- i. Details of the quantity, size, species, and position,
 - ii. Planting methodology
 - iii. Proposed time of planting (season)
 - iv. 5 year maintenance and management programme .
2. If within a period of 5 years from the date of planting that tree or any tree planted in replacement for it, is removed, uprooted, destroyed or dies (or becomes in the opinion of the local planning authority seriously damaged) then the tree shall be replaced to reflect the specification of the approved planting scheme in the next available planting season or in accordance with a timetable agreed in writing with the local planning authority.

REASON: To safeguard the appearance of the locality.

U0079756 Green/Living roof

Prior to commencement of development above ground floor slab level, final details of proposed green/living/biosolar roof, shall be submitted to and approved by the Local Planning Authority. The green roof shall be implemented prior to occupation of any part of the development, in accordance with the approved specifications and maintenance schedule and maintained permanently thereafter, unless otherwise approved, in writing, by the Local Planning Authority. There should be a minimum of 340m² of wildflower meadow and brown roof. The submission must provide/comprise the following information:

- a) Details on materials used in the design, construction and installation of the green roof based on the Green Roof Code and the use of biodiversity based extensive/semi-intensive soils;
- b) details on substrate and plants used in the green roof, based on a commercial brick-based aggregate or equivalent with a varied substrate depth of minimum 150mm planted with 50% locally native herbs/wildflowers in addition to a variety of sedum species;
- c) details on additional features to the proposed green roof, such as areas of bare shingle, areas of sand for burrowing invertebrates, individual logs or log piles; and
- d) an ecological management and maintenance plan including landscape features and a cross section of the green roof.

REASON: To ensure the biodiversity benefits and ecological benefits of the development are delivered and maintained.

U0079757 Ecological Enhancements

Unless otherwise agreed in writing by the LPA, the development hereby approved shall not be implemented other than in accordance with a scheme of ecological enhancements to be submitted to approved in writing by the LPA and to be retained thereafter, unless otherwise approved in writing by the LPA. To include the following:

1. Recommendations of the Biodiversity Strategy rev 4 dated October 2018 and Preliminary Ecological Appraisal rev 4 dated October 2018 to be implemented in full.
2. Wildlife enhancements as per the recommendations of the above reports.
3. Details of the enhancements to include numbers, location, aspect, height, type etc
4. Timetable for implementation

REASON: To preserve the ecological value of the site hereby approved

U0079758 Hard and Soft Landscaping Required

(A) No development above ground slab level shall take place until full details of both hard and soft landscaping works have been submitted to and approved in writing by the local planning authority. These details shall include proposed finished levels or contours; means of enclosure; car parking layouts; other vehicle and pedestrian access and circulation areas; hard surfacing materials; minor artifacts and structures (e.g. furniture, play equipment, refuse or other storage units, signs, lighting etc.); proposed and existing utility services above and below ground (e.g. drainage, power, communications cables, pipelines etc, indicating lines, manholes, supports etc); retained historic landscape features and proposals for restoration, where relevant; a program or timetable of the proposed works.

(B) Soft landscape works shall include planting plans; written specifications (including cultivation and other operations associated with plant and grass establishment); detailing the quantity, density, size, species, position and the proposed time or programme of planting of all shrubs, hedges, grasses etc, together with an indication of how they integrate with the proposal in the long term with regard to their mature size and anticipated routine maintenance. All tree, shrub and hedge planting included within that specification shall be carried out in accordance with BS 3936:1986 (parts 1, 1992, Nursery Stock, Specification for trees and shrubs, and 4, 1984, Specification for forest

trees); BS 4043: 1989, Transplanting root-balled trees; and BS 4428:1989, Code of practice for general landscape operations (excluding hard surfaces).

(C) All hard and soft landscape works shall be carried out in accordance with the approved details and in any event prior to the occupation of any part of the development.

(D) If within a period of 5 years from the date of planting any trees, shrubs and climbers as part of a landscape scheme approved as part of this decision, or arising from a condition imposed on this decision, or any trees, shrubs and climbers planted in replacement for it, is removed, uprooted, destroyed or dies (or becomes in the opinion of the local planning authority seriously damaged) then the tree, shrub and climber shall be replaced to reflect the specification of the approved planting scheme in the next available planting season or in accordance with a timetable agreed in writing with the local planning authority.

REASON: To ensure that the proposed development does not prejudice the appearance of the locality and to preserve and enhance nature conservation interests

DV28 External illumination

Any external illumination of the premises shall not be carried out except in accordance with details giving the method and intensity of any such external illumination which shall be submitted to and approved in writing by the Local Planning Authority prior to the occupation of any part of the buildings.

REASON: To protect/safeguard the amenities of the locality.

U0079759 Ventilation Odour Control Condition

The commercial kitchen odour control system hereby permitted shall be installed in strict accordance with the details provided in the Odour Assessment Report submitted by AECOM dated October 2018 with specific reference to section 3 of the report. The system shall thereafter be retained as approved.

REASON: To protect neighbouring amenity

U0079760 Restaurant /bar/café

The ground floor restaurant/bar/café as illustrated on approved drawing PA2.02 rev 2 shall not be open to the public other than between the hours of 08:00 to 21:00pm on Monday to Sundays. A notice to this effect shall be displayed at all times on the premises so as to be visible from outside.

REASON: To ensure that the proposed development does not prejudice the amenities of nearby occupiers, or the area generally

U0079761 Piling

No piling shall take place until a piling method statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

REASON: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to impact on local underground sewerage utility infrastructure. To protect residential amenity.

U0079762 Wheelchair user units M4(3)

33 extra care units identified in the 'Unit Schedule' received 24.04.2019 and corresponding approved drawings shall be built to meet Building Regulation requirement M4(3) and all other residential units shall be built to meet Building

Regulation M4(2) and retained as such, unless otherwise approved, in writing, by the local planning authority.

REASON: To ensure these homes are readily adaptable to be wheelchair accessible to meet diverse and changing needs.

U0079763 Dust Management Strategy

Unless otherwise agreed in writing by the LPA, prior to commencement of the development hereby approved, a Dust Management Plan for the ground works, demolition and construction phases shall be submitted to and approved in writing by the Council. The development shall not be implemented other than in accordance with the approved scheme. The dust management plan shall include:

a. Demonstrate compliance with the guidance found in the control of dust and emissions from construction and demolition Best Practice produced by the Greater London Authority

(GLA)http://static.london.gov.uk/mayor/environment/air_quality/docs/construction-dust-pg.pdf

b. A risk assessment of dust generation for each phase of the demolition and construction. The assessment and identified controls must include the principles of prevention, suppression and containment and follow the format detailed in the guidance above. The outcome of the assessment must be fully implemented for the duration of the construction and demolition phase of the proposed development and include dust monitoring where appropriate.

c. where the outcome of the risk assessment indicates that monitoring is necessary, a monitoring protocol including information on monitoring locations, frequency of data collection and how the data will be reported to the Local Planning Authority;

d. details of dust generating operations and the subsequent management and mitigation of dust demonstrating full best practicable means compliance and covering construction activities, materials storage, on and off-site haul routes, operational control, demolition, and exhaust emissions; and

e. where a breach of the dust trigger level may occur a response procedure should be detailed including measures to prevent repeat incidence

REASON: In order to safeguard the amenities of neighbouring residents

U0079764 Sound insulation external scheme

Prior to the occupation of the development, a detailed sound insulation and ventilation specification scheme for protecting the proposed development from transportation noise such as road traffic, rail traffic and air traffic, shall be submitted to and approved in writing by the Local Planning Authority. The scheme shall meet the internal noise design criteria detailed in the Noise Survey and Assessment submitted by AECOM dated October 2018 with specific reference to the details provided in section 7 of the report. Thereafter, the scheme shall be implemented and maintained in full compliance with the approved measures.

REASON: To protect residential amenity

U0079765 Demolition/Construction/Logistics Method

1) Unless otherwise agreed in writing by the LPA, prior to commencement of any demolition, a Construction Management Statement / Logistics Plan for the ground works and demolition phase of the development site shall be submitted to and approved in writing by the Council.

2) Unless otherwise agreed in writing by the LPA, prior to commencement of the construction of the development, a Construction Management Statement / Logistics Plan for the construction phase of the development site shall be submitted to and approved in writing by the Council.

3) The development shall not be implemented other than in accordance with the approved details through the demolition / construction period. The document shall demonstrate compliance with the guidance found in the Construction Logistics Plan for developers produced by Transport for London and include:

- a. The size, number, routing and manoeuvring tracking of construction vehicles to and from the site, and holding areas for these on/off site;
- b. Site layout plan showing manoeuvring tracks for vehicles accessing the site to allow these to turn and exit in forward gear;
- c. Details and location of parking for site operatives and visitor vehicles (including measures taken to ensure satisfactory access and movement for existing occupiers of neighbouring properties during construction);
- d. Details and location where plant and materials will be loaded and unloaded;
- e. Details and location where plant and materials used in constructing the development will be stored, and the location of skips on the highway if required;
- f. Details of any necessary suspension of pavement, roadspace, bus stops and/or parking bays;
- g. Details where security hoardings (including decorative displays and facilities for public viewing) will be installed, and the maintenance of such;
- h. Details of any wheel washing facilities;
- i. Details of a scheme for recycling/disposing of waste resulting from demolition and construction works (including excavation, location and emptying of skips);
- j. Details of measures that will be applied to control the emission of noise, vibration and dust including working hours. This should follow Best Practice detailed within BS5288:2009 Code of Practice for Noise and Vibration Control on Construction and Open Sites;
- k. Details of any highway licenses and traffic orders that may be required (such as for licences for any structures / materials on the highway or pavement; or suspensions to allow the routing of construction vehicles to the site);
- l. Details of the phasing programming and timing of works;
- m. Where applicable, the Construction Management Statement should be written in conjunction with the Arboricultural Method Statement, and in accordance with British Statement 5837:2012 'Trees in relation to design, demolition and construction - recommendations', in particular section 5.5, 6.1, 6.2, 6.3 and 7;
- n. A construction programme including a 24 hour emergency contact number;
- o. See also TfL guidance on Construction Logistics Plans;
- p. Communication strategy for residents during demolition and construction.

REASON: In the interests of highway and pedestrian safety together with the amenity of the area and neighbours.

U0079767 Noise and Vibration Construction Method

- a) Unless otherwise agreed in writing by the LPA, prior to commencement of any demolition, a noise and vibration Construction Method Statement (CMS) for the ground works and demolition phase of the development site shall be submitted to and approved in writing by the Council.
- b) Unless otherwise agreed in writing by the LPA, prior to commencement of the construction of the development, a noise and vibration Construction Method Statement (CMS) for the construction phase of the development site shall be submitted to and approved in writing by the Council.
- c) CMS details submitted under (a) and (b) shall include control measures for noise, vibration including working hours. Approved details shall be implemented throughout the project period. The CMS shall follow the Best Practice detailed within BS 5228:2009+A1:2014 Code of Practice for noise and Vibration Control on construction and open sites and BS 6187:2011 Code of practice for full and partial demolition. Further guidance can be obtained from the commercial environmental health department. The CMS should include an acoustic report undertaken by a suitably qualified and experienced consultant and include all the information below:
 - i. Baseline noise assessment - undertaken for a least 24-hours under representative conditions to determine the pre-existing ambient noise environment.
 - ii. Noise predictions and the significance of noise effects - Predictions should be included for each phase of the demolition, and construction, vehicle movements and an assessment of the significance of noise effects must be included based on the guidance in BS 5228:2009+A1:2014 Annex E

- iii. Method of Piling. Where piling forms part of the construction process, a low noise and vibration method must be utilised wherever possible, and good practice guidelines should be followed e.g. BS 5228:2009+A1:2014.
 - iv. Vibration Predictions and the significance of vibration effects - Predictions should be included for each phase of demolition, and construction, and an assessment of the significance of vibration effects must be included e.g. as per BS 5228:2009+A1:2014.
 - v. Noise and vibration monitoring - Permanent real time web enabled and/or periodic noise and vibration monitoring must be undertaken for the duration of the demolition and construction phases which may result in a significant impact. The location, number of monitoring stations and the measurement data must be agreed with the LPA prior to the start of construction.
 - vi. Community engagement - The steps that will be taken to notify and update residents and businesses that may be affected by the construction of the proposed development.
- REASON: To safeguard the amenity of the area and neighbouring residents.

U0079766 Sound insulation internal scheme

A scheme for the sound insulation of the party wall/floor/ceiling between any commercial uses within the development (communal healthcare, therapy, leisure and social facilities including a Restaurant bar cafe and swimming pool) and any structurally adjoining residential units shall be submitted to and approved in writing by the local planning authority. The scheme approved by the local planning authority shall be fully implemented in accordance with the approved details before the use, hereby permitted, commences. The works and scheme shall thereafter be retained in accordance with the approved details. No alteration to the ceiling which undermines the sound insulation integrity of the partition shall be undertaken without the grant of further specific consent of the local planning authority.

The sound insulation scheme will need to ensure a sound insulation performance standard for separating walls, separating floors, and stairs that have a separating function of: Airborne Sound Insulation Performance $D_{nT,w} + C_{tr}$ dB - 55 to 60 (dependent on use type)

REASON: To protect neighbouring amenity

U0079769 Delivery, Servicing and Waste strategy

Prior to the occupation of the development, a final Delivery, Servicing and operational waste and recycling strategy shall be submitted to and agreed in writing by the Local Planning Authority. The scheme approved by the local planning authority shall be implemented at all times in accordance with the approved details unless otherwise agreed in writing by the Local Planning Authority.

REASON: To ensure a safe and convenient form of development with limited impact on local roads and to safeguard the amenities of nearby occupiers and the area generally and to ensure adequate refuse storage is provided on site and can be readily collected, to accord with the Refuse and Recyclables in Development SPD.

U0079768 Mechanical Services Noise Control

Before any mechanical services plant including heating, ventilation and air conditioning (HVAC) and kitchen extraction plant to which the application refers is used at the premises, a scheme shall be submitted to and approved in writing by the local planning authority which demonstrates that the following noise design requirements can be complied with and shall thereafter be retained as approved:

- a) The cumulative measured or calculated rating level of noise emitted from the mechanical services plant including heating, ventilation and air conditioning (HVAC) and kitchen extraction plant to which the application refers, shall be 5dB(A) below the existing background noise level, at all times that the mechanical system etc operates. The measured or calculated noise levels shall be determined at the boundary of the nearest ground floor noise sensitive premises or 1 meter from the facade of the nearest first floor (or higher) noise sensitive premises, and in accordance to the latest British

Standard 4142; An alternative position for assessment /measurement may be used to allow ease of access, this must be shown on a map and noise propagation calculations detailed to show how the design criteria is achieved.

b) The plant shall be isolated so as to ensure that vibration amplitudes which causes re-radiated noise not to exceed the limits detailed in table 4 detailed in section 7.7.2 of BS8233:2014 Guidance on sound insulation and noise reduction for buildings " A commissioning acoustic test and report shall be undertaken within 2 weeks of mechanical services commissioning, in order to demonstrate that conditions (a) and (b) above have been achieved. The results of the test shall be submitted to and approved in writing by the LPA.

REASON: To protect neighbouring amenity

U0079770 Air Quality-NRMM

All on-site construction vehicles and equipment must be registered on the Non-Road Mobile Machinery website prior to their first use at the site.

REASON: To keep additional NO2 to a minimum in this AQMA.

DETAILED INFORMATIVES

U0035251 NPPF APPROVAL - Para. 38-42

In accordance with paragraphs 38-42 of the National Planning Policy Framework, Richmond upon Thames Borough Council takes a positive and proactive approach to the delivery of sustainable development, by:

- o Providing a formal pre-application service
- o Providing written policies and guidance, all of which is available to view on the Council's website
- o Where appropriate, negotiating amendments to secure a positive decision
- o Determining applications in a timely manner.

In this instance:

- o The application was recommended for approval and referred to the first available Planning Committee, where the agents / applicants had an opportunity to present the case.

U0035249 Composite Informative

Reason for granting:

The proposal has been considered in the light of the Development Plan, comments from statutory consultees and third parties (where relevant) and compliance with Supplementary Planning Guidance as appropriate. It has been concluded that there is not a demonstrable harm to interests of acknowledged importance caused by the development that justifies withholding planning permission.

Principal Policies:

Where relevant, the following have been taken into account in the consideration of this proposal:-

National Planning Policy Framework (February 2019) (NPPF)

National Planning Policy Guidance (NPPG)

DCLG 'Technical Housing Standards' - nationally described space standard (2015)

London Plan (Adopted March 2016 - Consolidated with alterations since 2011):

1.1 - Delivering the strategic vision and objectives for London; 2.6 - Outer London: Vision and strategy; 2.7 - Outer London: Economy; 2.8 - Outer London: Transport; 2.18 Green Infrastructure: The multi-functional network of green and open space; 3.1 - Ensuring equal life chances for all; 3.2 - Improving health and addressing health inequalities; 3.3 - Increasing Housing supply; 3.4 - Optimising housing potential; 3.5 -

Quality and design of housing developments; 3.8 - Housing choice; 3.9 - Mixed and balanced communities; 3.10 - Definition of affordable housing; 3.11 - Affordable housing targets; 3.12 - Negotiating affordable housing on individual private residential and mixed use schemes; 3.16 - Protection and enhancement of social infrastructure; 3.17 - Health and social care facilities; 4.4 - Managing industrial land and premises; 5.1 - Climate change mitigation; 5.2 - Minimising carbon dioxide emissions; 5.3 - Sustainable design and construction; 5.5 - Decentralised energy networks; 5.6 - Decentralised energy in development proposals; 5.7 - Renewable energy; 5.9 - Overheating and cooling; 5.10 - Urban Greening; 5.11 - Green roofs and development site environs; 5.12 - Flood risk management; 5.13 - Sustainable drainage; 5.14 - Water quality and wastewater infrastructure; 5.15 - Water use and supplies; 5.16 - Waste net self-sufficiency; 5.18 - Construction, excavation and demolition waste; 5.21 - Contaminated land; 6.3 - Assessing effects of development on transport capacity; 6.9 - Cycling; 6.10 - Walking; 6.11 - Smoothing traffic flow and tackling congestion; 6.12 - Road network capacity; 6.13 - Parking; 7.1 - Lifetime neighbourhoods; 7.2 An inclusive environment; 7.3 - Designing out crime; 7.4 - Local character; 7.5 - Public realm; 7.6 - Architecture; 7.7 - Location and design of tall and large buildings; 7.13 - Safety, security and resilience to emergency; 7.14 - Improving air quality; 7.15 - Reducing noise and enhancing soundscapes; 7.17 - Metropolitan open land; 7.19 - Biodiversity and access to nature 7.21 - Trees and woodlands; 7.29 - The River Thames; 8.2 - Planning obligations; 8.3 - Community infrastructure levy.

Draft London Plan (consultation draft December 2017, including early suggested changes published August 2018):

GG1 - Building strong and inclusive communities; GG2 - Making the best use of land; GG3 - Creating a healthy city; GG4 - Delivering the homes Londoners need; GG6 - Increasing efficiency and resilience; D1 - London's form and characteristics; D2 - Delivering good design; D3 - Inclusive design; D4 - Housing quality and standards; D5 - Accessible housing; D6 - Optimising density; D7 - Public realm; D8 - Tall buildings; D10 - Safety, security and resilience to emergency; D11 - Fire safety; D13 - Noise; H1 - Increasing housing supply; H5 - Delivering affordable housing; H6 - Threshold approach to applications; H7 - Affordable housing tenure; H12 - Housing size mix; H15 - Specialist older persons housing; S1 - Developing London's social infrastructure; S2 - Health and social care facilities; S6 - Public toilets; E7 - Industrial intensification, co-location and substitution; G3 Metropolitan Open Land; G5 - Urban greening; G6 - Biodiversity and access to nature; G7 - Trees and woodlands; SI1 - Improving air quality; SI2 - Minimising greenhouse gas emissions; SI3 - Energy infrastructure; SI4 - Managing heat risk; SI5 - Water infrastructure; SI7 - Reducing waste and supporting the circular economy; SI12 - Flood risk management; SI13 - Sustainable drainage; SI14 - Waterways - strategic role; T1 - Strategic approach to transport; T2 - Healthy Streets; T4 - Assessing and mitigating transport impacts; T5 - Cycling; T6 - Car parking; T6.1 - Residential parking; T9 - Funding transport infrastructure through planning; DF1 - Delivery of the Plan and Planning Obligations.

With due regard to paragraph 48 of the NPPF, the emerging London Plan will be given weight in the decision making process according to its stage of preparation (i.e. the more advanced the preparation, the greater the weight that may be given). Whilst there is a version of the Draft London Plan showing Minor Suggested Changes on the GLA's website (from August 2018), the GLA have been proposing a whole raft of changes in response to and during the EIP hearing sessions that have recently been taking place (from January to May 2019). It is difficult to have an oversight and full picture as to what the final version of the Plan and its policies would look like. Therefore, whilst the draft new London Plan is a material planning consideration, the plan and the assessments that inform it may be subject to change or deletion and as a consequence, little weight can be given to the emerging London Plan.

Local Plan (2018):

LP1 - Local Character and Design Quality; LP2 - Building Heights; LP7 - Archaeology; LP8 - Amenity and Living Conditions; LP10 - Local Environmental Impacts, Pollution and Land Contamination; LP13 - Green Belt, Metropolitan Open Land and Local Green Space; LP15 - Biodiversity; LP16 - Trees, Woodlands and Landscape; LP17 - Green Roofs and Walls; LP18 - River corridors; LP20 - Climate Change Adaptation; LP21 -

Flood Risk and Sustainable Drainage; LP22 - Sustainable Design and Construction; LP23 - Water Resources and Infrastructure; LP24 - Waste Management; LP28 - Social and Community Infrastructure; LP29 - Education and Training; LP30 - Health and Wellbeing; PL31 - Public Open Space, Play Space, Sport and Recreation; LP 34 - New Housing; LP35 - Housing Mix and Standards; LP36 - Affordable Housing; LP37 - Housing Needs of Different Groups; LP 39 - Infill, Backland and Back Garden Development; LP 42 - Industrial Land and Business Parks; LP44 - Sustainable Travel Choices; LP45 - Parking Standards and Servicing; Site Allocation SA26

London Plan Supplementary Planning Guidance:

Accessible London: Achieving an Inclusive Environment SPG (October 2014); Affordable Housing and Viability SPG (2017); Character and Context SPG (June 2014); Housing SPG March (2016); Sustainable Design and Construction SPG (April 2014); The control of dust and emissions during construction and demolition SPG (July 2014).

Richmond Supplementary Planning Guidance/Documents:

Affordable Housing SPD (March 2014); Car Club Strategy (2006); Contaminated Land (2003); Design Quality SPD (February 2006); Front Garden and other Off-Street Parking Standards (2006); Kew Village Planning Guidance SPD (July 2014); Planning Obligations (in conjunction with Borough CIL - 2014); Nature Conservation and Development (undated); Refuse and Recycling Storage Requirements SPD (2015); Residential Development Standards (2010); Security by design (2002), Small and Medium Housing Sites (2006); Sustainable Construction Checklist Guidance Document SPD (January 2016); Thames Strategy - Kew to Chelsea (June 2002); Trees: landscape design, planting and care SPG (November 1999); and Trees: legislation and procedure SPG (November 1999).

Building Regulations:

The applicant is advised that the erection of new buildings or alterations to existing buildings should comply with the Building Regulations. This permission is NOT a consent under the Building Regulations for which a separate application should be made. For application forms and advice please contact the Building Control Section of the Street Scene department, 2nd floor, Civic Centre, 44 York Street, Twickenham, TW1 3BZ. (Tel: 020 8891 1411).

If you alter your proposals in any way, including to comply with the Building Regulations, a further planning application may be required. If you wish to deviate in any way from the proposals shown on the approved drawings you should contact the Development Control Department, 2nd floor, Civic Centre, 44 York Street, Twickenham, TW1 3BZ. (Tel: 020 8891 1411).

Damage to the public highway:

Care should be taken to ensure that no damage is caused to the public highway adjacent to the site during demolition and (or) construction. The Council will seek to recover any expenses incurred in repairing or making good such damage from the owner of the land in question or the person causing or responsible for the damage.

BEFORE ANY WORK COMMENCES you MUST contact the London Borough of Richmond upon Thames, 44 York Street, Twickenham TW1 3BZ, Telephone 020 8891 1411 to arrange a pre-commencement photographic survey of the public highways adjacent to and within the vicinity of the site. The precondition survey will ensure you are not charged for any damage which existed prior to commencement of your works.

If you fail to contact us to arrange a pre commencement survey then it will be assumed that any damage to the highway was caused by your activities and you will be charged the full cost of repair.

Once the site works are completed you need to contact us again to arrange for a post construction inspection to be carried out. If there is no further damage then the case will be closed. If damage or further damage is found to have occurred then you will be asked to pay for repairs to be carried out.

Noise control - Building sites:

The attention of the applicant is drawn to the requirements of section 60 of the Control of Pollution Act 1974 in respect of the minimisation of noise and vibration on construction and demolition sites. Application, under section 61 of the Act for prior consent to the works, can be made to the Environmental Health Department.

Under the Act the Council has certain powers to control noise from construction sites. Typically the council will limit the times during which sites are permitted to make noise that their neighbours can hear.

For general construction works the Council usually imposes (when necessary) the following limits on noisy works:-

Monday to Friday 8am to 6pm

Saturdays 8am to 1pm

Sundays and Public Holidays- No noisy activities allowed

Applicants should also be aware of the guidance contained in British Standard 5228:2009- Noise and vibration control on construction and open sites.

Any enquiries for further information should be made to the Commercial Environmental Health Team, 2nd Floor Civic Centre, 44 York Street, Twickenham TW1 3AB.

IL13 Section 106 agreement

This planning permission has a Section 106 Agreement which must be read in conjunction with it.

U0035253 CIL Liable

The applicant is advised that this permission results in a chargeable scheme under the Mayor of London's Community Infrastructure Levy.

U0035259 Community Toilet Scheme

To find out how your business can join the scheme email communitytoilets@richmond.gov.uk.

U0036304 Drinking water

The applicant is advised to give consideration to providing a drinking water fountain for public use in combination with community use of the ground floor toilets and cafe/bar/restaurant facilities.

U0035463 Construction Method Statement

The applicants are advised that when drafting the Construction Management Statement, as secured via condition, each 'point' of the condition should form a sub-heading in the Statement. Where a point is not applicable please state this, with justification.

The applicant is advised to follow the Best Practice detailed within BS 5228:2009+A1:2014 Code of Practice for noise and Vibration Control on construction and open sites and BS 6187:2011 Code of practice for full and partial demolition. Further guidance can be obtained from the commercial environmental health department.

Where piling forms part of the construction process, a low noise and vibration method must be utilised wherever possible, and good practice guidelines should be followed e.g. BS 5228:2009+A1:2014.

The applicant is strongly encouraged to continue their engagement with local residents and stakeholders in the formulation of the detailed CMS.

U0035265 Construction Logistics Plan

The applicant is reminded that the submission of details of a Construction Logistics Plan (CLP) shall be included as part of the in the Construction Method Statement to comply with the requirement of condition DV49. The CLP shall include the following details:

- a) Identify the steps that will be taken to minimise the impacts of deliveries and waste transport;
- b) commitment to avoid deliveries in peak hours;
- c) demonstrate compliance with Transport for London's guidance on Construction; and Logistics Plans and the Borough's Air Quality Supplementary Planning Guidance.

U0035262 Short stay drop-off space

Clear parking restrictions should be displayed on or near the short stay drop-off space to ensure that the space will not be used as an additional long stay space for the site.

U0035257 Cycle Parking Provision

The applicant is reminded that the submission of details for the condition relating to cycle parking should clarify provision for larger cycles.

IH08A Travel Plan

The applicant is asked to contact Traffic and Transport, London Borough of Richmond upon Thames, 44 York Street, Twickenham TW1 3BZ (Telephone 020 889 1411), regarding the preparation of a "Travel Plan" to show the proposed means of travel by employees and prospective visitors to the site including control of the on-site car parking spaces.

IM09 Disabled parking

Parking for people with disabilities should be provided in spaces not less than 3.6m wide x 4.8m deep, conveniently located relative to the building entrances and clearly signed for its purpose.

IE06 Details of piling-EHO consultation

The attention of the applicant is drawn to the requirements of section 60 of the Control of Pollution Act 1974 in respect of the minimisation of noise and vibration on construction and demolition sites. Application, under section 61 of the Act for prior consent to the works, can be made to the Environmental Health Department. Where developments include foundations works require piling operations it is important to limit the amount of noise and vibration that may effect local residents.

There are a number of different piling methods suitable for differing circumstances. Guidance is contained in British Standard BS 5228 Noise control on Construction and Open Sites - Part 4: Code of Practice for noise and vibration control applicable to piling operations.

Where there is a risk of disturbance being caused from piling operations then the council under section 60 Control of Pollution Act 1974 can require Best Practicable Means (BPM) to be carried out. This may entail limiting the type of piling operation that can be carried out.

The types of piling operations which are more suitable for sensitive development in terms of noise and vibration impact are;

- * Hydraulic Piling
- * Auger Piling
- * Diaphragm Walling

IM01 Disabled persons

The applicant's attention is drawn to the provisions of the Chronically Sick and Disabled Persons Act 1970 (Section 4,7, 8a) and to the Code of Practice for Access for the Disabled to Buildings (BS 5810: 1979). Attention is also drawn to the provisions of Part M of the Building Regulations - access and facilities for disabled people.

U0035260 Solar PV panels and ASHP details

You are reminded that the final details of the PV panel and ASHP shall not result in an increase to the anticipated carbon dioxide emissions as predicted by the approved by the Energy Statement. Any further reductions to the carbon dioxide emissions would however be welcomed.

U0035255 Thames Water

To the north of the proposed development site sits Kew Biothane SPS. There are also easements and wayleaves running through the east and west of the Site. These are Thames Water Assets. The company will seek assurances that it will not be affected by the proposed development.

The proposed development is located within 15m of a Thames Water Sewage Pumping Station and this is contrary to best practice set out in Sewers for Adoption (7th edition). Future occupiers of the development should be made aware that they could periodically experience adverse amenity impacts from the pumping station in the form of odour; light; vibration and/or noise.

The proposed development is located within 15m of a strategic sewer. Please read the guide 'working near our assets' to ensure your workings will be in line with Thames Water's necessary processes you need to follow if you're considering working above or near pipes or other structures. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk Phone: 0800 009 3921 (Monday to Friday, 8am to 5pm) Write to: Thames Water Developer Services, Clearwater Court, Vastern Road, Reading, Berkshire RG1 8DB

There are public sewers crossing or close to your development. The applicant is advised to read the guide working near or diverting our pipes. <https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>.

A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. The developer is expected to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 02035779483 or by emailing wwqriskmanagement@thameswater.co.uk. Application forms should be completed on line via www.thameswater.co.uk/wastewaterquality.

A Trade Effluent Consent will be required for any Effluent discharge other than a 'Domestic Discharge'. Any discharge without this consent is illegal and may result in prosecution. (Domestic usage for example includes - toilets, showers, washbasins, baths, private swimming pools and canteens). Typical Trade Effluent processes include: - Laundrette/Laundry, PCB manufacture, commercial swimming pools, photographic/printing, food preparation, abattoir, farm wastes, vehicle washing, metal plating/finishing, cattle market wash down, chemical manufacture, treated cooling water and any other process which produces contaminated water. Pre-treatment, separate metering, sampling access etc, may be required before the Company can give its consent. Applications should be made at

<https://wholesale.thameswater.co.uk/Wholesale-services/Business-customers/Trade-effluent> or alternatively to Waste Water Quality, Crossness STW, Belvedere Road, Abbeywood, London. SE2 9AQ. Telephone: 020 3577 9200.

Swimming Pools - Where the proposal includes a swimming pool Thames Water requests that the following factors are adhered to with regard to the emptying of swimming pools into a public sewer to prevent the risk of flooding or surcharging: -
1. The pool to be emptied overnight and in dry periods.
2. The discharge rate is controlled such that it does not exceed a flow rate of 5 litres/ second into the public sewer network.

Thames Water will aim to provide customers with a minimum pressure of 10m head (approx 1 bar) and a flow rate of 9 litres/minute at the point where it leaves Thames Waters pipes. The developer should take account of this minimum pressure in the design of the proposed development.

There are water mains crossing or close to your development. Thames Water do NOT permit the building over or construction within 3m of water mains. The applicant is advised to read our guide working near or diverting our pipes.

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>

The proposed development is located within 15m of Thames Waters underground assets, as such the development could cause the assets to fail if appropriate measures are not taken. Please read our guide working near our assets to ensure your workings are in line with the necessary processes you need to follow if you're considering working above or near our pipes or other structures.

<https://developers.thameswater.co.uk/Developing-a-large-site/Planning-your-development/Working-near-or-diverting-our-pipes>. Should you require further information please contact Thames Water. Email: developer.services@thameswater.co.uk

Thames Water request details to show that the feasibility for connecting directly to the River Thames has been considered, we do not support the connection of surface water to the public network where the site is in such close proximity to the watercourse.

U0035258 EA Informative

There shall be no habitable accommodation on the ground floor level as stated in the FRA. The ground floor should be used as less vulnerable use only. There should be a minimum buffer zone of 16 metres from the development and the flood defence embankment to ensure the development does not affect the stability and integrity of the defence and it does not prevent future maintenance and emergency works. Any works that will be carried out within 16m of the flood defence embankment will need a Flood risk activity permit, including any landscaping works. Flood risk activities can be classified as: Exclusions, Exemptions, Standard Rules or Bespoke. These are associated with the level of risk your proposed works may pose to people, property and the environment.

U0035261 Flood Warning and Evacuation Plan

You are reminded to take advice from the emergency services and the Environment Agency 'Flood line service' when producing an emergency response plan or evacuation plan

U0035263 Archaeology

A written scheme of investigation will need to be prepared and implemented by a suitably qualified professionally accredited archaeological practice in accordance with Historic England's Guidelines for Archaeological Projects in Greater London. This condition is exempt from deemed discharge under schedule 6 of The Town and Country Planning (Development Management Procedure) (England) Order 2015.

The archaeological field evaluation involves exploratory fieldwork to determine if significant remains are present on a site and if so to define their character, extent, quality and preservation. Field evaluation may involve one or more techniques depending on the nature of the site and its archaeological potential. It will normally include excavation of trial trenches. A limited number of archaeological trenches are recommended to be excavated in the north-western part of the site for the purposes of recording a section through the alluvium and gravel, and to examine the potential survival of the gravel surface.

U0035264 Ecological enhancements

In seeking to discharge details relating to soft landscaping, the green roof and ecological enhancements, the applicant is advised that:

- a) Policy LP15 and the NPPF require Ecological Enhancements, these need to be provided for bats/birds/invertebrates and it is recommended that swift/bat/sparrow terrace are built in to the fabric of the building, stag beetle loggeries and invertebrate habitat. These should be shown on the EE plan, with details of specs, location, aspects, height and maintenance proposals.
- b) The northern section of the landscaping should have native (pollinator friendly) tree planting and some native shrubs (preferably pollinator friendly) in front.
- c) Consideration should be given to the box tree caterpillar as box blight issues would not make *buxus sempervirens* an ideal choice of species to be used at present.
- d) The green roof is advised to include a combination of wildflowers with brown features, logs, pebbles and water.
- e) There should be no upwards lightspill into the open sky or any tree or vegetation canopies and a dark corridor should be maintained along the towpath. If external illumination is proposed, details will need to be provided to include a lighting plan, specifications of proposed lamps (which should all be as per BCT lighting guidance) and a lux contour map at ground level and at 5 metres high.
- f) Details should be provided for the main lawn landscaping and formal landscaping (full landscaping details including a plan, species, spec and maintenance programmes)

IE03 Restaurant - EHO Consultation

The applicant is advised to contact Commercial Environmental Health Team, 2nd Floor Civic Centre, 44 York Street, Twickenham TW1 3AB prior to the commencement of any work.

IL02 Advertisements

The applicant is advised of the need to obtain separate consent under the Town & Country Planning (Control of Advertisements) Regulations 1992 for any advertisements requiring express consent which it is to display on these premises.

IM11 Use of hardwoods

If hardwood is to be used in the development hereby approved the applicant is strongly recommended to ensure that it is from a recognised sustainable timber source. You are invited to consult the 'Good Wood Guide' produced by Friends of the Earth together with The National Association of Retail Furnishers for advice on this matter.

U0035450 Fire Statement

The applicant is encouraged to meet the terms of Policy D11 of the Draft London Plan by preparing a Fire Statement. All building users should be able to evacuate from a building with dignity and by as independent means as possible. The installation of lifts which can be used for evacuation purposes (accompanied by a management plan) provide a dignified and more independent solution. The fire evacuation lifts and

associated provisions should be appropriately designed, constructed and include the necessary controls suitable for the purposes intended.

IM13 Street numbering

If you wish to name or number a new development, sub-divide an existing property, or change the name or number(s) of an existing property or development, you will need to apply to the London Borough of Richmond Upon Thames. Further details of this process, fees, and the necessary information and forms that need to be submitted can be found on the Council's website

http://www.richmond.gov.uk/street_numbering_and_naming. Alternately you may contact Peter Cridland, Address Management Manager (020 8891 7889 peter.cridland@richmond.gov.uk).

IT06 Nature Conservation

When submitting proposals for landscaping the site applicants are advised that in determining the suitability of such proposals the Local Planning Authority will take into account the scope for enhancing the nature conservation interest of the site.

IT05 Trees - Size of new stock

The Local Planning Authority would normally expect all new trees to be planted to be a minimum size of SELECTED STANDARD which shall have a sturdy reasonably straight stem with a clear height from ground level to the lowest branch of 1.8m, an overall height of between 3m and 3.5m and a stem circumference measured at 1m from ground level of 10-12cm. The tree shall, according to the species and intended use, have either a well-balanced branching head or a well defined, straight and upright central leader with the branches growing out from the stem with reasonable symmetry.

U0035254 Fox trappings

You are reminded that a method statement shall be compiled to guarantee that any demolition works are carried out as per best practice as trapping or harming mammals is against the Wild Mammals Act 1996.

END OF SCHEDULE OF CONDITIONS AND INFORMATIVES FOR APPLICATION
18/3310/FUL

FUL Applications

Making an Appeal – Summary Guidance

Whether to appeal

If the Local Planning Authority (LPA) turn down your application, you should look carefully at the reasons why they turned it down before you make an appeal. You should speak to the LPA to see if you can sort out the problem - perhaps by changing your proposal. An appeal should only ever be a last resort.

Type of appeal:

Planning Application

Appeal time:

Within six months of the date of the council's decision letter.

Who can appeal?

The applicant or their agent may lodge an appeal.

The right of appeal:

You can appeal against the council's decision:

- If you applied to the Local Planning Authority and they:
 - Refused permission;
 - Gave permission but with conditions you think are inappropriate;
 - Haven't approved the details of a scheme which they or the Secretary of State have already given outline planning permission for or;
 - Have approved the details of a scheme but with conditions you think are inappropriate or unreasonable.

- If the LPA rejected a proposal arising from a condition or limitation on a planning permission.
- If the LPA don't decide your application within the time allowed. Normally the time allowed is eight weeks from when they accept your application.
- If the LPA told you they needed more information before they could decide your outline planning application, but you do not want to supply this.

You will make your appeal to the Department for Communities and Local Government of which the Planning Inspectorate is a part. Most are decided by specialist officers in the Planning Inspectorate. Only the person or business applying for consent to display an advertisement may appeal. If the council issues a discontinuance notice, only those on whom the notice is served may appeal.

The appeal process:

Appeals must be made

- Online at www.planninginspectorate.gov.uk, or
- Initial Appeals, The Planning Inspectorate, Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN.

It will be expected that all appeal documentation will be submitted electronically.

The process is fully documented on the website of the Planning Inspectorate www.planninginspectorate.gov.uk, however in summary there are three main types of appeal:

Written procedure:

Written evidence is considered from the applicant/agent/business and the council. The council will send copies of any letters of objection or support they received when considering your application. Within six weeks of the Inspectorate receiving your appeal forms the council will send a copy of their statement to the Inspectorate. You must make any comment on these within three weeks.

Hearing procedure:

Hearings allow you and the council to exchange views and discuss your appeal. Before the hearing the council will send a copy of their statement to you and the Inspectorate. You can comment on their statement in writing otherwise the Inspectorate will treat the reasons given in your appeal form as the basis of your case for discussion.

Hearings are usually held in council offices. The Inspector leads the discussion and invites the people involved to put their points across. The Inspector will visit the site unaccompanied before the hearing and will make a further accompanied visit as part of the hearing.

Inquiry procedure:

Inquiries are normally for large-scale applications. A public inquiry is a formal procedure in which both parties have legal representation.

Making your views known on someone else's appeal:

The LPA will notify anyone who took part in the consultations when you first applied for permission that you are appealing. For appeals decided by hearing or inquiry the LPA will tell interested people when and where this will be and let them know that they can attend. The Inspectorate will also take account of the views of certain groups who have a right to comment, for example, owners of a site, local amenity groups and so on.

Costs:

Normally you and the council will pay for your own expenses in an appeal. You can only claim costs when you can show that the council have behaved in an unreasonable way causing unnecessary expense.

Who to contact?

The Planning Inspectorate

Website www.planninginspectorate.gov.uk

Email enquiries@pins.gsi.gov.uk

Telephone 0303 444 5000

Write to Initial Appeals, The Planning Inspectorate, Temple Quay House, 2 The Square, Temple Quay, Bristol BS1 6PN

London Borough of Richmond upon Thames

Website www.richmond.gov.uk/planning

Email planningappeals@richmond.gov.uk

Telephone 020 8891 1411 for advice

Write to The Appeals Officer, Development Control, Civic Centre, 44 York Street, Twickenham TW1 3BZ

