West London Small Sites SHLAA

Part A: Critique
West London Alliance
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WEST LONDON ALLIANCE

Small Sites SHLAA For West London

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Part A report: Critique

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Executive Summary

This project has been commissioned by the West London Alliance (WLA). The WLA is a is a partnership between seven West London local authorities of Barnet, Brent, Ealing, Hammersmith & Fulham, Harrow, Hillingdon and Hounslow. This document is just one of a suite of technical reports that inform the seven Boroughs' response to the draft London Plan 2017.

This Report represents Stage One of a 'Small Sites Strategic Housing Land Availability Assessment' (SHLAA) for West London.

It should be noted that this study is not a statement of Council policy. Rather, it is a technical document that comprises part of the evidence base assisting the West London Alliance with its assessment of proposals in the draft London Plan 2017.

The stage of the study represents a 'Critique' of the policy approach to support increased rates of development on 'small sites' in the draft London Plan 2017. It represents a review of an existing methodology proposed by the GLA. The critique evaluates how accurately this has regard to factors affecting development and what other considerations may be necessary to inform policy on the suitability and delivery of sites towards housing requirements.

The outputs at the Critique stage therefore provide the starting point to determine whether a more realistic approach is necessary to fully incorporate estimates of currently unidentified supply as a robust component of achievable targets and their ability to meet housing need. To a lesser, although still significant extent, the Critique provides the basis to propose or evaluate the role of alternative policy approaches (existing and future) and alternatives to the GLA methodology.

The Stage One Report should be read alongside the Stage Two assessment of 'Delivery' forming part of the overall conclusions. The Stage Two process looks in more detail at the development process for small sites and the relationship with factors and trends identified in the Critique.

The purpose of the study is not to identify or assess individual areas of land and buildings but to broadly indicate details on the conditions for development taking place – including scheme scale, type, size and location. Any discussion of a site or capacity for development under certain conditions expressed within the study does not constitute an allocation nor influence planning applications.

While the findings of this study might make a future contribution towards policy development it is anticipated that any such role will first be predicated on the findings of the Examination in Public of the draft London Plan 2017 and the policy approach towards development on 'small sites' that is ultimately adopted.

As part of any future role our findings would be applied alongside other studies as part of the evidence-base for plan-making in each individual borough. These other studies include, for example, infrastructure delivery, open space, employment and retail provision. These need to be considered together to help inform policy decisions and overall judgement on the potential for development of a given type or in a given location.

NOTE:

Any assessment of activity on small sites is, by definition, a snapshot in time. Although the study can be used as a proactive tool by the West London Alliance to better understand the capacity for development and the dynamics for delivery on small sites, individual drivers and patterns of activity may evolve significantly over time for whatever reason. The source data for this assessment is provided by the London Development Database – i.e. schemes already identified through their planning history. This has historically been used as a tool for development monitoring rather than policy preparation. This information will continue to be shaped by new proposals for development and details regarding whether or not (and how) extant permission are implemented and brought forward. It is therefore important that the findings of the study are regularly reviewed, testing the assumptions underpinning the assessment of capacity and monitoring the progress of delivery from different sources of supply on small sites over time.

1. Introduction

The Study Area and Context

1.1 Membership of the West London Alliance (WLA) comprises seven West London local authorities of Barnet, Brent, Ealing, Hammersmith & Fulham, Harrow, Hillingdon and Hounslow ('the constituent boroughs' or "West London Boroughs') plus the Old Oak and Park Royal Development Corporation (OPDC) (Figure 1.1). This project has been commissioned by the West London Alliance (WLA)but LB Hammersmith and Fulham and OPDC have not participated in the study. With the exception of LB Hammersmith and Fulham the remaining boroughs are all typically classified as comprising part of 'Outer London'.

1.2 The geography of the West London Alliance is significant in planning terms. The area is amongst the largest formally constituted joint working areas in the United Kingdom. Collectively the proposed housing targets in the draft London Plan 2017 equate to around 24% of the total minimum housing delivery required in the capital for the next 10 years. This is excluding the substantial capacity for development enabled by the Old Oak and Park Royal Development Corporation (OPDC) (2.1%), which also forms part of the WLA. Successive iterations of the London Plan have reflected support for large-scale regeneration within the WLA area and growing targets for housing delivery on identified sites and development allocations. The vision of the WLA is to support 'West London' as a thriving and prosperous part of the capital.

1.3 The West London Alliance promotes an open approach and dialogue. The instructions for this project recognise a role for the preparation of a joint evidence-base covering the WLA. It is expected to form one of a number of joint evidence studies commissioned through the WLA that can promote joint-working, inform development plan preparation and ultimately support joint-working and the vision for growth in the area.

1.4 The requirement for this project is to recognise that within the overall context provided by the WLA and the classification of West London there exists variety at borough level. The draft London Plan 2017 continues to provide separate housing targets for each individual borough. While there are common characteristics and themes in historic patterns of development in West London there is also a high degree of diversity and variation in features reflected in the built, natural and socio-economic environments. It is fundamentally an aim of this project to recognise and where relevant to reflect differences where they might affect our findings and recommendations.

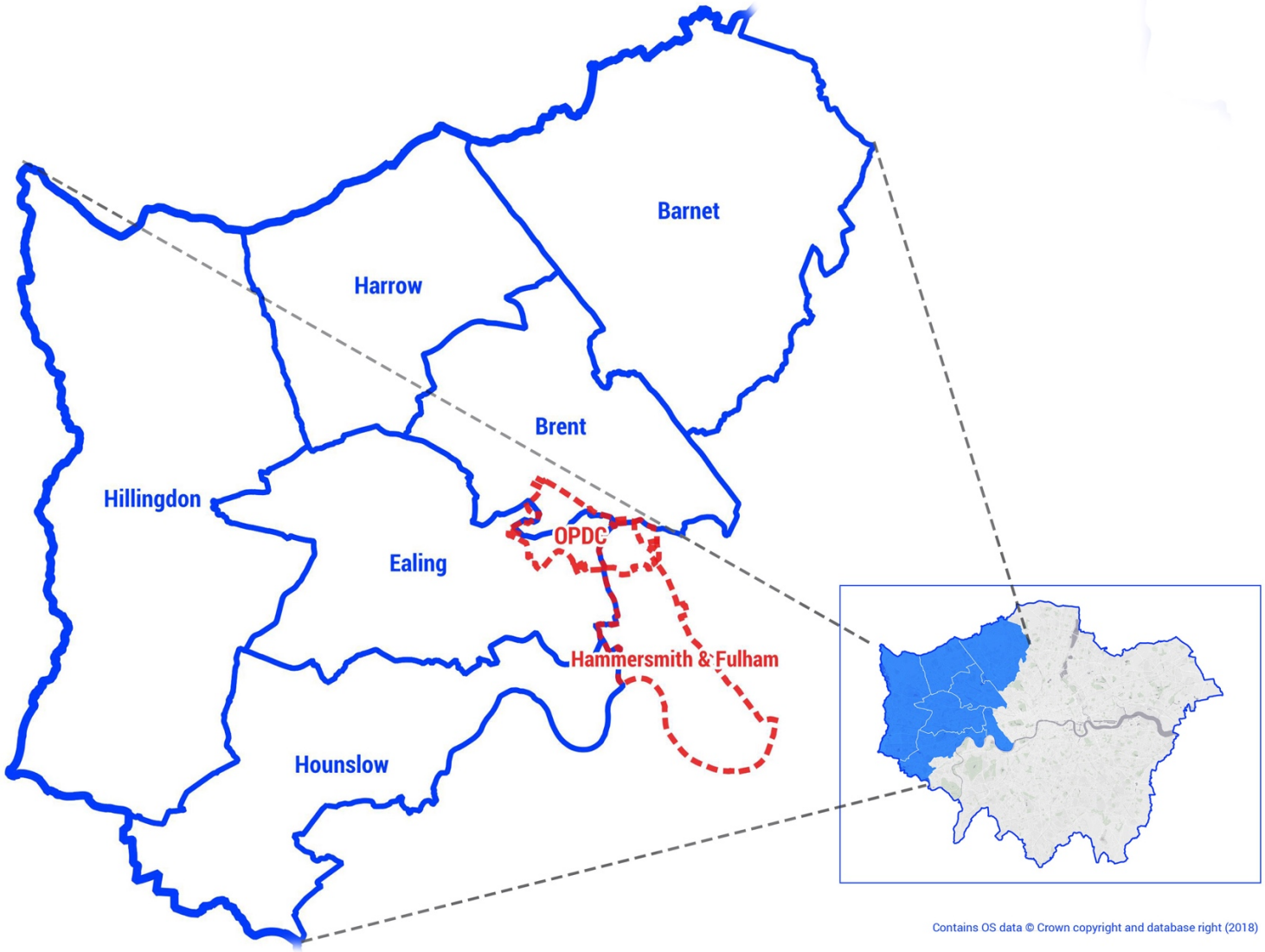


Figure 1.1: WLA Participants. Delineated Boundaries of LB Hammersmith and Fulham and OPDC Form Part of the WLA but are not Participants in the Study

Purpose of the Study and Policy Context

1.5 The overall theme of this study comprises an assessment of housing land availability. National planning policy supports the preparation of such assessments and places great importance on ensuring that the sites or broad locations identified as part of the potential future supply of land for housing are suitable and to establish the prospects for development to be delivered.

1.6 National planning policy also recognises that the ability to provide land for housing to meet overall requirements can encompass a range of components of supply. One such component is the delivery of housing from previously unidentified sites. This is typically known as 'windfall' development and this theme is central to this project. Contributions to supply from this component can be justified where judgements are clearly and transparently set out; having regard to the findings of land availability assessments is one way to demonstrate this.

1.7 For this reason, the project can most succinctly be referred to as a 'small sites' Strategic Housing Land Availability Assessment for West London – the 'Small Sites SHLAA'.

1.8 The context within which this evidence will first be considered is the emerging London Plan 2017. Its focus is specifically on the measure of supply from unidentified sites anticipated through draft Policy H2 of the draft London Plan 2017: 'Small Sites and Small Housing Developments'. The draft London Plan 2017 defines Small Sites as sites below 0.25ha in size and Small Housing Developments as developments between 1 and 25 homes.

1.9 The study represents a comprehensive evaluation of draft Policy H2 'Small Sites and Small Housing Developments' contained within the emerging London Plan 2017 and its supporting evidence base, principally comprising the GLA Strategic Housing Land Availability Assessment ('SHLAA') (November 2017). The main body of the report confirms that we have taken account of Minor Suggested Changes to draft Policy H2 issued in August 2018 as part of the early stages of the Examination in Public for the London Plan. These do not affect the proposed targets for the delivery of development from 'small sites'. A copy of draft Policy H2 and its associated footnotes is included for reference below. Readers should note the policy is to be read alongside supporting text and therefore requires reference back to the draft London Plan 2017 to fully interpret the proposed approach in draft Policy H2.

Policy H2 Small sites and small housing developments

A Small sites **(below 0.25 hectares in size)** should play a much greater role in housing delivery **to achieve the ten-year housing targets set out in Policy H1 Increasing housing supply.** ~~and~~ ~~b~~Boroughs should pro-actively support well-designed new homes on small sites through both planning decisions and plan-making in order to:

1) significantly increase the contribution of small sites to meeting London's housing needs
2) diversify the sources, locations, type and mix of housing supply
3) support small and medium-sized housebuilders
4) support those wishing to bring forward custom, self-build and community-led housing

4A) achieve the targets for small sites set out in Table 4.2.

B Boroughs should:

1) recognise in their Development Plans and planning decisions that local character evolves over time and will need to change in appropriate locations to accommodate additional housing provision and increases in residential density through small housing developments
2) prepare area-wide design codes **for small housing developments between 1 and 25 homes** to:

a) ~~promote good design and to~~ proactively encourage increased housing provision**, good design** and higher residential densities

b) cover the spatial locations set out in part D2 (excluding the exempted areas listed in part F)

c) ~~on small housing developments. Design codes should~~ provide clear guidelines and parameters for **the range of** small-**scale** housing developments **listed in part D2, as a minimum, to provide certainty** and show how additional housing provision can be accommodated in different locations, drawing on the principles set out in this policy and Supplementary Planning Guidance provided by the GLA.

2A) prepare site-specific briefs, masterplans and design codes for other types of small sites (under 0.25 hectares in size), where appropriate

C Boroughs should increase planning certainty on small sites by:

1) identifying and allocating appropriate small sites for residential development
2) listing these sites on their brownfield registers
3) granting permission in principle on specific sites or preparing local development orders.

The presumption in favour of small housing developments between 1 and 25 homes

D To deliver the small sites targets in Table 4.2, boroughs should apply a presumption in favour of the following types of small housing development which provide between one and 25 homes:

1) infill development on vacant or underused **brownfield** sites
2) proposals to increase the density of existing residential ho**uses**~~mes~~ within PTALs 3-6 or within 800m of a ~~Tube~~ station[37A]~~, rail station~~ or town centre boundary[37B] through:
   a) residential conversions **(subdivision of houses into flats)**
   b) residential extensions **(upward, rear and side)**
   c) the demolition and**/or** redevelopment of existing ~~buildings~~ **houses and/or ancillary buildings**
   d) infill development within the curtilage of a house[37C]
3) the redevelopment or upward extension of flats**,** ~~and~~ non-residential buildings **and residential garages** to provide additional housing.

E For the purposes of part D, the presumption in favour of small housing developments means approving small housing developments ~~which are in accordance with a design code developed in accordance with part B. Where there is no such design code, the presumption means approving small housing development~~ unless it can be demonstrated that the development would give rise to an unacceptable level of harm ~~to residential privacy, designated heritage assets, biodiversity or a safeguarded land use~~ that outweighs the benefits of additional housing provision**; or where development does not comply with a design code prepared in accordance with part B**.

F The presumption in favour of small housing developments should not be applied to:
1) ~~statutory listed buildings~~ **designated heritage assets and their settings[37D] (however, a presumption in favour of residential conversions should be applied in conservation areas)**
2) developments providing more than 25 homes
3) proposals that do not provide net additional housing
4) sites of more than 0.25 hectares in size
5) non-self-contained housing schemes **(i.e. that are not in Class C3 residential use)**
6) ~~mixed-use proposals within~~ **sites that contribute to the strategic functions of** the Central Activities Zone (CAZ)
7) ~~estate regeneration schemes.~~ **designated industrial or employment sites**
7A) change of use of non-residential buildings to residential use[37E]
7B) designated Green Belt, MOL, Sites of Importance for Nature Conservation (SINCs)[37F] and other protected public open spaces
7C) buildings that would be more than 30 metres high (following their redevelopment or extension)
7D) development that involves the alteration or replacement of existing homes on social housing estates.

G **Homes located on the ground floor on minor developments should meet the requirements of Policy D5 Accessible Housing;** ~~New build homes on sites capable of accommodating ten units or fewer which are on the ground floor should meet M4(2) standard for 'accessible and adaptable dwellings' and provide step-free access. New build homes on these sized sites~~ **homes** that are not on the ground floor **on minor developments** ~~do not need to meet M4(2) standards and~~ can comply with the M4(1) standard, which does not require step-free access.

H **Policy H6 Threshold approach to applications must be applied to small sites which are major developments and trigger affordable housing requirements.** Boroughs wishing to apply affordable housing requirements to **minor developments** ~~sites capable of delivering ten units or fewer and which have a maximum combined gross floor space of no more than 1,000 sqm~~ should only require this through a tariff approach to off-site contributions rather than seeking on-site contributions **and.** ~~Boroughs~~ are strongly encouraged to provide the flexibility for payments to be collected prior to the occupation of development, rather than prior to commencement of development **in these instances.**

HA To benefit from the presumption, small housing developments must:
a) meet the minimum standards for private internal space and private outside space set out in Policy D4 Housing quality and standards
b) meet minimum cycle parking standards
c) not exceed maximum residential parking standards
d) accord with Agent of Change principles and Policy HC7 Protecting public houses on public houses
e) where they are classified as major developments, meet the Air Quality Neutral benchmark[37G] for building emissions, by using ultra-low NOx boilers or other less polluting technologies[37H].

HB To benefit from the presumption in Part E, minor developments should achieve no net loss of overall green cover and major developments should contribute to urban greening in line with Policy G5 Urban greening and the Urban Greening Factor.

HC Small housing developments that demonstrably fail to optimise potential housing delivery on a site, or prejudice the more comprehensive development of a site allocation, should not benefit from the presumption in favour of development, unless there is a clear justification. Small developments should be designed to facilitate adjacent sites to come forward in the future.

Footnotes

[37A] **Tube, rail, DLR or tram station**

[37B] **District, major, metropolitan and international town centres- for the purposes of Policy H2D2, the 800m distance is measured from the edge of the town centre boundary**

[37C] **Subject to the total area of ground covered by buildings within the curtilage of the dwelling house not exceeding 50% of the total area of the curtilage (excluding the ground area of the original dwelling house), to be consistent with the Government's permitted development rights for a household set out in Part 1 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015).**

[37D] **See glossary for definitions of 'designated heritage assets' and 'setting of heritage assets'**

[37E] **See paragraph 4.2.3A**

[37F] **See definition in paragraph 8.6.1**

[37G] **Air Quality Neutral benchmarks are set out in Policy SI1 Improving air quality and accompanying GLA guidance**

[37H] **Less polluting technologies could include heat pumps, connection to an existing district heating scheme, fuel cells or renewables.**

Table 1.1: Draft Policy H2 in the emerging London Plan 2017 (with proposed Minor Suggested Changes)

1.10 For the first time the draft London Plan 2017 introduces specific targets for the delivery of 'small sites'. Previous iterations of the London Plan have anticipated delivery from unidentified 'small sites' as part of overall benchmarks for housing delivery. The expectation of future supply was based on a projection of past rates of development and assumed to remain a relatively stable component across future years, which is a typical approach to calculating 'windfall' trends. The small sites component of the overall target was determined in the SHLAA that informed previous iterations of the London Plan, but was not identified as a separate target.

1.11 National policy does allow expected *future trends* to be taken into account to forecast different levels of development from unidentified sites. This is the approach followed by the draft London Plan 2017 as an indicator of what is seen as a significant opportunity to increase the delivery of 'small sites'. The resulting targets represent a significant step-change from past and current rates of activity of this type (see Table 1.2).

1.12 The scale of these targets is of significant concern to the WLA and the constituent boroughs, which have been expressed in their representations following consultation on the draft London Plan in December 2017.

WLA / Individual Borough	Small Sites Target 2019-2029	% of Total Housing Target	% increase from London Plan 2013
Barnet	1204	38.4%	268.2%
Brent	1023	35.1%	289%
Ealing	1074	38.3%	256.8%
Harrow	965	69.3%	284.5%
Hillingdon	765	49.3%	339.7%
Hounslow	680	31.2%	322.4%
WLA total	65711	40.8%	286.7%

Table 1.2: List of the seven WLBs; Summary of Small Sites Target

1.13 Each borough has a need to understand existing trends and implications for future patterns of development under draft Policy H2. All have an interest in assessing and evaluating alternative policy approaches e.g. the delivery of large sites and setting out implications for these alongside the requirements of draft Policy H2. The Suggested Minor Modifications make it clear that any further intensification of large sites above the capacity in the SHLAA cannot be used to offset the small site requirements. The draft London Plan 2017 expects the small site targets to be met regardless of any additional capacity from large sites.

1.14 A key objective of this study is to review and where relevant substantiate or supplement concerns in the Boroughs' representations and inform their responses to the emerging 2017 London Plan (particularly the ongoing Examination in Public).

1.15 The starting point to inform this assessment is the Strategic Housing Land Availability Assessment (2017) prepared by the GLA as part of the evidence base for the draft London Plan 2017. The identification of targets for development on 'small sites' can be clearly attributed to the findings of this evidence but its outputs are, in effect, a proxy for how unidentified sites might be supported and brought forward. However, the role of this project is to establish whether this assessment fully addresses the requirements of national policy to inform consistent and reliable estimates of supply and evaluate its contribution to the development of policy as opposed to a theoretical measure of capacity only. The WLA is concerned with the level of engagement with individual boroughs and other stakeholders and the extent of scenario testing before targets for development on 'small sites' were confirmed.

Overall Aims and Wider Relevance

1.16 The nature of how the forecast for activity on 'small sites' has been prepared has a significantly greater numerical impact on Outer London and is a key reason for further exploring the expectations and impacts of draft Policy H2. This study aims to make a significant and comprehensive contribution to exploring key issues for the WLA.

1.17 The proposed introduction of a *presumption in favour of small housing developments* is a central component of draft Policy H2 and is considered by the GLA to support delivery of targets for 'small sites'. Amongst its requirements and expectations for development outcomes is a need for planning policies and decisions *"recognise that local character evolves over time and will need to change in appropriate locations to accommodate additional housing provision and increases in residential density through small housing developments"*. This is predicated on significantly higher rates of intensification through measures such as sub-division of existing dwellings through conversion and removal of provisions in previous versions of the London Plan to restrict development on garden land.

1.18 There is a need to explore specifically how wide-ranging the opportunities for development supported by the proposed *presumption* might be in practice; how appropriate they might be in the context for sustainable development in West London; and whether they can be estimated as a reliable source of supply taking into account delivery trends and considerations.

1.19 Achieving the scale of targets for development on 'small sites' is however predicated on achieving increased rates of development from a range of development types. Other measures within and linked to draft Policy H2 highlight how increased levels of activity may be supported, but recent trends indicate relatively stable patterns of activity and potential barriers to further increasing development must be explored.

1.20 Undertaking a comprehensive assessment of these concerns follows two key themes in evaluating the evidence base for the London Plan. This study looks to determine whether the GLA SHLAA provides accurate and appropriate measures of **capacity** on 'small sites' and whether these can realistically be achieved in terms of prospects for **delivery**. More widely, and in terms of drawing conclusions, these measures are important to understand the **impacts** of draft Policy H2. These include the effect on development outcomes and considering the policy's role alongside existing and potential alternative policy options. These overall findings are likely to inform conclusions on the potential **soundness** of the approach in the context of the draft London Plan 2017.

1.21 Beyond the specific themes and issues for the assessment we also hope that this project can make a wider contribution to longer-term to policy on the development of 'small sites'. Notwithstanding its specific findings on the measures of draft Policy H2 and its associated ability to reliably inform estimates of future supply, the contribution to London's housing requirements from this component will remain significant.

1.22 The wider context for this project and the overall background to preparation of draft Policy H2 is framed by discussion on the need to better facilitate and support the delivery of appropriate development at all scales. Planning policy and legislation in recent years has already responded with measures considered more attractive and complementary to supporting small builders and enable small sites. Observing the effect of these interventions in practice is still at an early stage and others measures continue to be formulated and implemented.

1.23 The ongoing value of this project to the WLA is therefore to support future work on the preparation of planning policy and the review of existing Local Plans so that the constituent boroughs can continue to support the delivery of 'small sites' and ensure they make a robust contribution to meeting future requirements. The study enables the further exploration of potential alternative approaches and evaluation of different policy options, including their relationship with the development of large sites. This should enable opportunities that assist with further boosting housing delivery and support the overall objectives behind draft Policy H2 to be identified and implemented, notwithstanding that a different balance of measures may be more appropriate to securing sustainable development in different contexts.

Engagement with WLA Boroughs

1.24 Data from all seven constituent boroughs in the West London Alliance was made available in Part A of the study (Critique) to help provide a statistical background, inform the scope of the project and to determine the most appropriate approach to be taken for reporting findings, although Hammersmith and Fulham Council are not part of the final study This is because the nature of the Small Sites methodology and modelled approach, is more directly relevant to the outer London Boroughs, which excludes Hammersmith and Fulham as it is classified as an inner London borough.

1.25 Each of the constituent boroughs submitted representations to the December 2017 consultation on the draft London Plan expressing a range of concerns on the approach to preparing draft Policy H2 and the draft policy itself. The West London Alliance boroughs taking part in this study agree that undertaking the work for this project has helped to explore concerns regarding the GLA's approach to small sites and small housing developments in the draft London Plan. They also agree that the early stages of this project outline a robust

assessment of the GLA's small sites methodology to prepare the 2017 SHLAA. On the basis of the approach taken and issues identified each of the constituent boroughs continue to assert that their representations to the draft London Plan and continue to express legitimate soundness concerns.

1.26 The WLA boroughs taking part in this study recognise that the initial assessment of issues in this project sets the framework for more detailed analysis. This provides an appropriate basis to highlight more specific implications for the development of small sites at the level of individual boroughs. In doing so, this provides a means to explore the key themes of capacity, delivery and by extension the impacts of the proposed approach in draft Policy H2, albeit the core issues with soundness exist notwithstanding the ability to present further findings.

1.27 The WLA boroughs taking part in this study agree that the subsequent methodology to the subject study for more detailed analysis has taken a proportionate approach to most clearly reflect key areas most relevant to West London as a whole. At the level of individual borough geographies this may mean that the principles being explored are different and may not apply equally in each case. It should be noted that the same position would also apply if the geography of any individual borough was explored at decreasing scales, down to the level of individual areas or neighbourhoods.

1.28 This does not mean that further challenges do not exist with the development of small sites and the fundamental principles of a forecast approach. At lower spatial resolutions, the proposed approach could lead to difficulties in applying the presumption in favour of small housing developments in practice. Aspects such as the 25-unit threshold being high in the context of the borough are adequately highlighted in existing representations. These potential impacts exist alongside other barriers to maintaining past trends in 'remaining windfall' development such as controls over Permitted Development that will make the small sites target difficult to achieve.

1.29 As a result it is felt that these specific concerns, which are more qualitative in nature, have been affirmed by the initial approach to this assessment and that it is legitimate and appropriate to focus presenting further findings through quantitative analysis on the remaining boroughs (apart from Hammersmith and Fulham) where comparisons are more directly relevant to the outputs of the GLA's modelled approach.

Structure of The Stage One Report

1.30 Following this introductory section, the report is presented according to the various stages of work, providing an explanation of the approach followed and a summary of findings. The report sections are:

- Section 2; outlines the overall framework, structure and approach to the critique.
- Section 3; explores the concerns of the West London Alliance and the individual constituent boroughs at the outset of the project.
- Section 4; considers a wider literature review on the development process for small sites including opportunities to increase this source of supply and potential considerations for suitability and delivery.
- Section 5; seeks to illustrate, with reference to national policy and guidance, the principles of approaches to assess the contribution of delivery from unidentified sites and the GLA's methodology for 'small sites' targets
- Section 6; compares the findings of the GLA 2017 SHLAA in terms of past trends and their relationship with the proposed target for 'small sites'
- Section 7; deals with the detailed elements of the GLA's assumptions for the 'modelled' component of targets for 'small sites'
- Section 8; considers the impacts and relationship of draft Policy H2 with existing planning policies and development requirements;
- Section 9; provides the detailed analysis of some other factors affecting development (in terms of suitability and the relationship with delivery) and the potential capacity for development in West London. It concludes with a link to the Part B report where issues associated with delivery are considered further.

2. Structure of the Critique

Stage 1 of the study sought to refine and develop the method as part of the overall response to the Project Brief and to provide a framework to assess delivery on small sites.

Underlying Principles and Engagement

2.1 As part of developing the method for the assessment we have summarised a number of key principles that govern the conclusions that we are able to establish:

- Understanding the development on 'small sites' will to a large extent be informed by existing data on sites with a status in the planning system;
- The spatial context of west London is a relevant geographic starting point for this assessment but does not preclude the assessment of differences and unique characteristics within and between individual boroughs;
- Understanding past trends and implications for how development will be managed in the future both need to take account of the relationship with existing policies;
- By their nature, the number of examples of development on 'small sites' are extensive, and their characteristics are highly diverse. Factors that seem relevant to development opportunities and constraints will not apply equally to all examples;
- This assessment of development on 'small sites' is not a site identification exercise but a relationship between the process of site identification (and allocation) and the consequences of a 'modelled' target for development on small sites should be explored;
- The assessment may therefore inform the evidence base for plan-making and provide the foundations for future site identification work to provide exhaustive information on specific development options and opportunities;
- A robust understanding of contribution of small sites to future supply and the development pipeline is an essential conclusion;
- A range of stakeholders are involved in the development process for small sites
- The assessment should have regard to a wide range of literature and the delivery of small sites forms an important topic on the wider planning agenda;

- The cumulative type, scale and locations for development of small sites (particularly due to the nature of targets in draft Policy H2) can have wider consequences for sustainable development and these impacts are relevant in the context of the London Plan, such as assessing its support for 'Good Growth'

2.2 Due to the extensive range of evidence available to inform the assessment of 'small site' capacity and delivery in accordance with the above principles, stakeholder engagement has formed an essential part of the project. Contributions from the following methods, meetings and arrangements for data exchange are briefly summarised below and covered in detail by the main report.

2.3 It should be acknowledged that the conclusions reached by this assessment are only possible as a result of the range of evidence reviewed. The nature of conclusions is also partly dependent on the quality of some of this evidence itself, in-particular actual monitoring data on small site activity. It should be kept in-mind, and is a point specifically identified by the constituent boroughs, that resources such as the London Development Database have principally been developed as tools for monitoring. These processes have been adapted over time and depend on many users. They cannot be regarded as a tool specifically designed for the development of policy on 'small sites' in isolation, albeit knowledge of this data is critical from the point of view of assessing draft Policy H2.

Summary method

2.4 To address these principles and the requirements of the 'Small Sites SHLAA' for the West London Boroughs the work has been broken down into four main stages:

- **Stage 1: Foundations**
- **Stage 2: Critique**
- **Stage 3: Delivery**
- **Stage 4: Reporting and Alternative Conclusions or Approach**

2.5 The **foundations** for the study are provided by our response to the project requirements identified by the West London Alliance. These were clarified through an Inception meeting and refined based on identifying and confirming the availability of robust evidence and information to inform each stage of the assessment. This stage has governed the identification of key stakeholders and the arrangements for data exchange and reporting. Each sections of this report demonstrates how these foundations have supported the analysis at each stage.

2.6 The project is grateful for support from the Greater London Authority in terms of ensuring access to London-wide spatial datasets. These reflect information applied as part of preparation of the GLA SHLAA 2017 and therefore look to provide consistency with the evidence base for the draft London Plan 2017.

2.7 The West London Alliance has requested that the 'Small sites' Strategic Housing Land Availability Assessment explores two key themes: Capacity and Delivery. The **critique** essentially provides our response on the first theme of capacity. It is deliberately broad in its recognition of the factors that should be taken into account when assessing the contribution that unidentified sites (often referred to *windfall development*) might make towards the supply of housing. Relevant sections of the report demonstrate that the critique is informed by national policy and guidance covering *windfall development*.

2.8 The wider framework and analysis within the critique represents an assessment of what we identify as material planning considerations that may influence findings on the suitability, availability and achievability of future development[1]. Relevant sections define each consideration and look to illustrate their relationship to the evidence base for the draft London Plan 2017 (including, if relevant, the calculation of targets for 'small sites). The project aims to identify the relevance of these factors to the context in the constituent boroughs and indicate the potential wider impacts of draft Policy H2.

2.9 The critique has been prepared as part of an iterative process and was informed by a Workshop with Officers from constituent boroughs within the West London Alliance. This provided an opportunity to highlight and explore concerns (to ensure these had been accurately captured) and discuss their potential importance.

2.10 The GLA's position is that testing in the SHLAA 2017 provides an evidence-led position to introduce the *presumption in favour of small housing developments* and significantly increase activity on smaller sites. This is the overall hypothesis tested by this project. Draft Policy H2 within the draft London Plan 2017 seeks to deliver specific targets for development on 'small sites' that are directly informed by the SHLAA and which the GLA regards as achievable in-line with the intended operation of the policy.

[1] The NPPF requires sites within the supply of land for housing to be suitable, available and achievable. The approach taken by the GLA models a potential future quantum of development on small sites, but does not demonstrate how this meets the criteria outlined in the NPPF.

2.11 The critique is therefore formulated against an understanding of the concepts and methods used to derive the targets for 'small sites' and the capacity for development this relies upon. The key concept evaluated is the appropriateness of moving away *projecting* rates of past activity into future and *forecasting* a significant step-change in the pattern of supply. The critique evaluates how closely achieving the capacity for development anticipated is likely to be captured and capable of being achieved through the provisions of draft Policy H2.

2.12 The critique provides conclusions on the extent to which factors may have been overlooked and should be more explicitly recognised in the methodology for the GLA SHLAA 2017. By extension this provides the foundations to suggest alternative approaches. Broadly these can be identified as positing three potential outcomes:

- Indicating a preference for basing rates of windfall development on past trends;
- Suggesting amendments to modelling assumptions to provide a future forecast for rates of development on small sites; or
- Signalling the potential role of alternative or complementary policy mechanisms as part of the development process for small sites.

2.13 **Stage 3** represents the detailed work to explore the second key theme that the West London Alliance has identified as relevant to the small sites SHLAA: **Delivery**. It is based on a methodology that logically follows and is interrelated with the approach and findings from the critique. Drawing on these links, the delivery assessment seeks to identify reasons for the trends and levels of development observed in the West London context.

2.14 Relevant sections of the report detail the quantitative and qualitative analysis undertaken as well as the evidence relied upon and the methodology for each step. This stage includes interrogation of information within the London Development Database and direct engagement with stakeholders involved in the delivery of development on small sites.

2.15 Analysing these patterns of delivery in more detail allows strengths and weaknesses in the application and processing of data in the GLA SHLAA 2017 to be identified. The methodology to assess delivery takes account of current practice and also the potential impacts of proposed Policy H2 in terms of how it seeks to manage development in the future.

2.16 This aims to provide a more comprehensive overview of the development process and from these findings identify whether this is likely to impose constraints on the deliverability of draft Policy H2's targets for development on small sites. It is concerned with understanding the reasons for levels of supply that have consistently become available in the past and factors affecting the reliability of future supply and scope to increase future delivery..

2.17 The West London Alliance has requested that the assessment of patterns of delivery highlights findings based on past trends in activity over different timescales as well as providing an understanding of the current partial pipeline for supply on 'small sites'. This is to provide the most up-to-date picture of factors affecting development from this type of activity.

2.18 Further analysis of the impact of existing policy mechanisms and the potential relationship between future trends and other policy mechanisms to manage and promote development is also undertaken at this stage. This includes, for example, potential relationships between the delivery of large sites and small sites.

2.19 Where the findings on delivery further substantiate that the level of activity on small sites is unlikely to correspond to the targets for development on 'small sites' the reasons for this are incorporated as part of conclusions for the overall assessment.

2.20 The requirements for **Reporting** are addressed in-line with the outputs from Stages 2 and 3. The outputs from this project therefore comprise Technical Reports and Non-Technical Summaries on the findings of the **Critique** and **Delivery Analysis**. Feedback from the West London Boroughs has therefore been obtained at each stage of the process.

2.21 The format of reporting presents an overall view across the constituent boroughs but recognises that there may be differences. This allows trends in individual boroughs to be highlighted and the potential reasons explored. This could include, for example, differences in the relationship with large sites or existing policy and the nature of the existing pipeline of supply on 'small sites'.

2.22 The final stage of reporting includes overall conclusions on the approach adopted in draft Policy H2 including its robustness (in terms of reliability of future supply), comparison with alternatives and the consequences for development outcomes. This enables constituent boroughs and West London Alliance collectively to decide whether to endorse some or all of the conclusions that may highlight specific issues with the soundness of draft Policy H2. We anticipate that our conclusions and their application by the constituent boroughs will form part of contributions to the Public Examination of the London Plan 2017.

Draft Policy H2 and Examination of the draft London Plan 2017

2.23 For the avoidance of doubt this assessment was undertaken between July and October 2018, following submission of the draft London Plan 2017 for Examination and aligned with the early stages of the Examination process. This timeframe coincides with the release of the Minor Suggested Changes to the draft London Plan (August 2018). We have taken the potential effect of these Minor Suggested Changes into account as part of the project, to the extent that they do not materially alter the 'small sites' targets produced as an output of the GLA SHLAA 2017 or put forward as targets (at Table 4.2) in the draft London Plan 2017 itself. The Minor Suggested Changes in-fact confirm the role of the figures in Table 4.2 as specific targets for monitoring in addition to the estimated capacity on large sites.

2.24 Given that **the proposed targets for 'small sites' are unchanged** we therefore find many of the Minor Suggested Changes helpful in simply confirming the parameters for the operation of the *'presumption in favour of small housing developments'* and corresponding assumptions in the GLA SHLAA 2017. We did not identify any Minor Suggested Changes that would confuse understanding of the development types used to inform the 'modelled' and 'windfall' estimates of supply on 'small sites' for the purpose of evaluating the GLA SHLAA 2017. The Minor Suggested Changes highlight more stringent standards and requirements that may make small site delivery at the scale in draft Policy H2 less likely. For example, Criteria E has been amended now to simply refer to "an unacceptable of level of harm", which in turn has increased possible reasons for refusal. However, the small sites targets have not been amended to reflect this.

2.25 A number of the other Minor Suggested Changes appear to emphasise or increase the scope for control over development standards and assess the impact on other existing land uses (including open space) or operations. We have interpreted these in the context that they will determine whether *the presumption in favour of small housing developments* applies to individual proposals and specific schemes; whilst adding detail, these changes do not affect Part D of draft Policy H2 in terms of the types and locations of development covered by the *presumption*. Undoubtedly there may be a cumulative impact of these restrictions to the *presumption* where they affect certain locations more than others. To this extent the Minor Suggested Changes can be interpreted as indicating recognition of factors affecting development on the part of the GLA, but they do not change the need for this study to look more widely at the likelihood of supply consistently becoming available.

2.26 Whether the Minor Suggested Changes are regarded as materially affecting the intended operation of draft Policy H2 is not a judgement that can be applied at the outset of this assessment. In practice, if draft Policy H2 is correctly regarded as having a strategic function then whether the Minor Suggested Changes result in materially different outcomes than would otherwise have been the case is presently un-knowable. It could only be confirmed or evaluated based on the subsequent experience of plan-making and decision-taking at borough level.

2.27 In many instances it would also be the case that the circumstances of individual proposals or plans at borough level transcend the considerations for draft Policy H2. It could well be that the draft London Plan 2017, applied as a whole, has other (greater) impacts on development outcomes. We would also highlight that there are links between policies (including draft Policy H2) that make this inevitably the case. Numerous examples have in-fact been flagged by the Minor Suggested Changes including references to assessing applicable proposals for 'small sites' against other relevant policies e.g. G5 Urban Greening, HC7 Protecting Public Houses and D4 Housing Quality and Standards. Draft Policy H11 Ensuring the Best Use of Stock (Part CA) (following Minor Suggested Changes) is an example of further interrelationships for decision-taking given its support for the general protection of HMOs comprising reasonable standards.

3. Overview of WLA Concerns

This section informs the initial scope of the 'Stage 2' Critique and provides an overview of concerns identified by both the West London Alliance and the seven boroughs individually in their representations to the draft London Plan. It represents a useful initial summary of engagement to-date and technical matters relevant to a critique of the overall capacity for the development of 'small sites' in the context of west London. In-particular this section identifies key topics for more detailed analysis and relevant sources of information.

Pre-Submission Consultation on the draft London Plan 2017

3.1 Each of the constituent boroughs within the West London Alliance submitted representations to the draft London Plan 2017 published for consultation between December 2017 and March 2018. Each representation highlights specific concerns with draft Policy H2.

3.2 A number of common themes can be identified and these formed part of the reason for seeking to undertake the Small Sites SHLAA for West London. These representations provide an initial understanding of the potential impacts of draft Policy H2 and indicate potential areas for further investigation. To assist with further analysis, we have broadly grouped comments under relevant sub-headings:

The SHLAA Process: Engagement and Methodology

3.3 The WLA express concerns that the London Boroughs have not had an input into the methodology used to calculate the targets for development from 'small sites'.

3.4 Concern has previously been expressed that the SHLAA methodology does not justify its use of modelling for some development types and historic trends for others. This is contrary to NPPF and planning practice guidance, which advises that weight should be attached to historic trends where likely to continue..

3.5 At a broad level these concerns are exacerbated by a lack of explanation for specific inputs used as assumptions for 'small sites' modelling. This specifically includes the view that 1% of the existing stock of houses in defined locations will be densified each year. This represents an estimate of potential capacity only, however the SHLAA advises that 1% is considered to provide a reasonable

estimate for the level of additional housing that could be provided in light of the potential impact of the proposed policy changes in the draft London Plan 2017. No attempt, however, has been made to measure the impact of the policy changes on the rate of delivery. In the absence of such evidence, the basis for the 1% figure remains unclear. In addition to this, relying solely on the capacity figures to derive the target is contrary to the NPPF with respect to ensuring reliable estimates of future supply from unidentified sites.

3.6 In preparing representations the constituent boroughs have taken account of the high proportion of housing (terraced and non-terraced) as a proportion of total dwelling stock in West London. There is specific recognition that the approach utilised for modelling does not include an assumption for increasing the density of existing flats. In the first instance this is seen as unfairly penalising Outer London boroughs, who have a lower level of flats compared to inner London and a higher proportion of stock where the 1% yield growth factor is applied. The representations also indicate that it would be unrealistic and contrary to the experience of development to restrict the application of the *presumption in favour of small developments* solely to housing stock. Both within West London and beyond there is recognition that some existing flatted development may be suitable for conversion and sub-division whereas a significant proportion of housing stock may not.

3.7 The WLA also has concerns that the small sites supply estimates may 'double count' the sources of development arising from opportunities within the existing housing stock. This would involve including the same household in both the modelling and the windfall trend analysis, overestimating the capacity. This could arise, for example, where a site could provide potential capacity for conversion or small scale 'new build' development, but would (in terms of historic trends) be more likely to indicate a source of supply to sustain rates of development for large windfall sites.

3.8 Finally, the constituent boroughs seek to highlight that the methodology for modelling may overplay the existing stock, as the Census data that the modelling is based upon may not be accurate: recorded housing stock may actually exist as flats, and therefore have already been intensified, which the modelling does not take into account in its predictions.

Past Trends and Factors Affecting Physical Capacity and Historic Rates of Development

3.9 The position favoured by constituent boroughs within the West London Alliance regards past trends in development as a more realistic indicator for the levels of supply that have consistently become available. However, this is not without qualification given recognition of changes to policy and outcomes in development observed between relatively short time periods.

3.10 The use of historic trends to determine different levels of capacity for different housing types is problematic because it assumes that the same level of densification will continue to occur in the future. In reality opportunities could be depleting, as the introduction of internal space standards may have reduced the level of additional housing achieved through the conversion of houses into flats.

3.11 Representations submitted by the constituent boroughs all agree that the small sites target may overestimate the capacity, as the small sites component of the SHLAA does not take into account physical site constraints, such as flood risk. Similarly, other factors, such as the desirability of an area, access to infrastructure, physical constraints to pedestrian permeability have not been taken account in the methodology. These comments indicate a broad recognition that the approach to the GLA SHLAA methodology has limited regard to local characteristics as a factor affecting development

The Achievability of 'Small Sites' Targets and Relationship with Other Policy Mechanisms

3.12 The boroughs within the West London Alliance recognise that the outputs of the 'modelled approach' generate targets that represent a significant uplift to rates of development on 'small sites'. There is broad agreement that at the current rate of delivery on small sites, the small sites target will not be achieved.

3.13 The WLA boroughs are concerned over the assumption that LPAs will identify existing individual units to intensify in order to produce additional capacity. They consider the identification of such sites on the scale assumed in the draft London Plan 2017 is not practical, realistic or appropriate, as the planning system has limited tools available to actively promote the intensification of existing housing stock.

3.14 The WLA consider that such opportunities to intensify will continue to principally take the form of windfall opportunities and will be dependent on the initiative and motivation of existing homeowners to bring forward sites.

3.15 Relationships with other existing and proposed policy mechanisms are also recognised as having potential implications for the level of development on 'small sites'.

3.16 The WLA express concern that the small sites policy conflicts with the draft London Plan 2017, which encourages boroughs to implement Article 4 Directions to remove office to residential permitted development rights. Office-to-residential conversion has been a significant source of small site capacity in the most recent years, often as a substitute for other development options.

3.17 There is general agreement amongst the responses of constituent boroughs that the utility of the planning tools promoted by H2 to increase planning certainty on small sites are likely to be limited. These concerns take account of the nature of development expected to yield capacity on small sites. Activities such as preparation and identification of sites on the Brownfield Land Register are expected to correlate relatively poorly with highlighting individual opportunities for residential intensification. The requirement to prepare area-wide Design Codes alongside development of the Local Plan is regarded as resource intensive. In some instances, the constituent boroughs anticipate that increased proposals to bring forward increased rates of development on small sites may compromise the delivery of proposals on large sites; for instance, through generating barriers to land assembly.

Understanding of the Development Process and Achievability Sites

3.18 Representations submitted by the constituent boroughs are in broad agreement that that the resulting targets for development on 'small sites' are unachievable in the West London context. This primarily arises from the '1%' yield growth rate figure for the modelled component, which assumes a significant increase in the delivery of completions from certain types of activity on small sites. For some boroughs, such as LB Harrow, this represents a more than eight-fold-increase in the rate of delivery.

3.19 The representations express that this methodology does not take into account the fact that there are a number of factors which prevent higher rates of delivery of small sites in the West London Boroughs, such as:

- depleting unconstrained opportunities to intensify;
- insufficient small and medium sized builders to undertake intensification projects;
- the desirability of existing homeowners to hold on to larger properties and the lack of a sufficient incentive to downsize or remodel their asset;
- higher levels of occupancy than previously reported;
- a desirability of existing homeowners to stay put and extend/ remodel their existing home (potentially under extended permitted development rights) rather than move;
- increased role of the private rented sector and Houses of Multiple Occupation (HMO);
- reduced net migration from London to the surrounding districts reducing the number of larger properties available for conversion;

- political opposition to intensification reflected through planning policy/decisions; and
- an increasing number of de-conversions, which works against any gains arising from different forms of intensification.

3.20 The West London Alliance has substantiated specific concerns over the financial viability of the three potential small site sources ('new build, 'conversion' and 'change of use). These note that the London Plan Viability Study (December, 2017) only considers the viability of infill sites and does not consider the financial viability of (for example) extensions, conversions and upward extensions.

Specific Issues Raised by Individual Boroughs

3.21 We have further reviewed the representations prepared by the individual boroughs comprising the West London Alliance. This recognises that the characteristics of West London are not uniform, and each borough may have different experiences of the factors affecting development and pressures on land use. This might specifically stem from the nature of existing planning policy; the approach to decision-taking; or recent experience in the allocation of large development sites or promoting regeneration opportunities and any resulting implications for patterns of development on small sites. This additional component of concerns to inform conclusions on the critique are summarised below under sub-headings for individual boroughs (where relevant).

LB Barnet

3.22 LB Barnet's own representations highlight a potentially detrimental relationship between the approach to development set out in draft Policy H2 and the delivery of schemes across larger sites. The borough considers that draft Policy H2 supports **a fragmented approach to town centre revitalisation**, undermining the opportunity for longer term, properly considered wholesale redevelopment/ regeneration of areas that would provide better development for communities and investment in infrastructure solutions to ensure the most effective use of land. For example, the small sites approach is in contradiction to LB Barnet's newly adopted Town Centre Framework SPD for North Finchley, which supports coordinated development in partnership with local stakeholders.

3.23 Outside of town centre locations LB Barnet is concerned that the production of design codes to prevent inappropriate development require significant work, for which they do not have the resources. The immediate implication of the *presumption in favour of small housing developments* will lead to conflict with existing development plan policy and may lead to the demolition of family housing, creation of flatted development (currently regarded as inappropriate) and could significantly alter character in an uncontrolled way.

LB Brent

3.24 LB Brent's own representations provide a general indication of practical difficulties associated with the targets for development on 'small sites' against the experience of development and understanding of housing need.

3.25 LB Brent is concerned that Policy H2 has the potential to increase the complication of existing site land ownerships by creating an additional layer of small-scale owners/leaseholders who may slow down wider significant changes and could potentially undermine them. This could lead to wider site allocations having to be brought forward in a more piecemeal way, where land is not used as effectively as it could have been. Recent experience of schemes brought forward under rights for Permitted Development have led to changes in the delivery of housing allocations.

3.26 The targets for development set out in draft Policy H2 are not considered to reflect the **LB Brent SHMA requirement for 65% of all new homes to be 3+ bed**, and as such will reduce the supply of new family sized homes.

3.27 The representations indicate that there may be some scope to pursue alternative policy approaches using 'areas of search' to identify locally appropriate ways to meet targets to boost patterns of housing delivery. This may involve incentives for activity on small sites but in other areas may favour more comprehensive regeneration or site allocations; yet for some locations boroughs may conclude local character is less compatible with radical change. The representations highlight there is currently a lack of **detailed character assessments** to support the GLA's assumptions.

3.28 LB Brent indicates some scope for flexibility in the policy requirements that may be applied to seek on-site contributions towards affordable housing (e.g. its own policies apply a threshold of 10 or more dwellings). These opportunities should be considered for inclusion in the London Plan alongside Part H of draft Policy H2 dealing with where off-site contributions may be applied.

LB Ealing

3.29 The representations prepared by LB Ealing have a high degree of consistency with the over-arching issues set out in the Project Brief and common issues across the West London Boroughs. Whilst not alone in raising these points, the representations highlight the closeness between the outputs from 'small site' modelling and producing the result that is needed to close the gap between supply and demand, rather than being used as a means of measuring what is achievable.

3.30 LB Ealing is concerned that while the policy identifies a range of measures intended to increase supply, the modelling itself fails to actually measure the effect of such interventions. This queries the effectiveness of the *presumption in favour of small housing developments*, particularly where LB Ealing highlight they have adopted a permissive approach towards development on small sites and pro-actively seek to allocate a wide range of suitable opportunities within the development plan.

3.31 LB Ealing considers that the targets for development on small sites should not be binding and should only form an advisory part of an overall housing figure for each borough to meet as they choose.

3.32 The representations express more substantive concerns with the potential role for **Design Codes**. The production of these is considered hugely onerous and regarded as misconceived as a delivery tool for a policy that is about encouraging bespoke design solutions and unconventional sites. LB Ealing consider that this should be an optional measure for Boroughs. More fundamentally draft Policy H2 is considered to place **a weak emphasis on design**, using negative phrasing in seeking only to avoid unacceptable levels of harm instead of making a positive case for the contribution that well-designed and appropriately located small housing development can make.

LB Harrow

3.33 LB Harrow raises a number of additional comments in its own representations that relate more directly to local characteristics in the built and natural environment and potential implications for the capacity of development on small sites. These comments include stressing that the role of draft Policy H2 in promoting infill development within existing residential curtilage (i.e. garden land) is contrary to paragraphs 48 and 53 of the NPPF.

3.34 LB Harrow identifies the **role of open areas that contribute to the character of 'Metro-land'** and that may also contribute to the mitigation of flood risk. The application of the *presumption in favour of small housing developments* is expected to introduce conflict with some sites performing these functions, including the cumulative impacts of development.

3.35 Representations by the borough also seek to highlight that because the targets for development on small sites are arrived at as a *proxy* there is no clear link between typical examples of development on small sites and instances where the *presumption in favour of small housing developments* would apply. This could, for example, lead to dispute over whether a site should be regarded as 'underused' and may encourage proposals that do not optimise the potential for development by proposing 25 or fewer units. This could lead to increased rates for determining proposals on appeal.

LB Hillingdon

3.36 The key additional concern raised by the borough's own representations is to indicate that that the proposed targets for 'small sites' represents an **unrealistically high proportion of development** that the borough is required to deliver (49% of the total housing target). This represents the second highest proportion amongst the West London Boroughs (after LB Harrow).

3.37 LB Hillingdon also identifies that the range of policy designations that should be recognised and will otherwise be brought into conflict with the *presumption in favour of small housing developments* has been underestimated. For the borough these include 'Area of Special Local Character' designations and local heritage assets.

3.38 The borough is concerned that the flood risk implications of the small sites policy have not been fully assessed. Sites of this size are not sequentially tested in terms of flood risk and would have to be dealt with as part of the windfall site process, which does not allow the LPA to plan for an appropriate level of flood mitigation.

LB Hounslow

3.39 No further specific comments have been identified within representations made by the constituent borough.

Summary of Representations

3.40 The constituent West London Boroughs demonstrate a substantial level of understanding of the 2017 GLA SHLAA methodology. Through their representations they indicate a number of significant implications and areas for further exploration in the context of this critique. This reflects the importance of local knowledge and differentiation between individual boroughs, as well as numerous separate experiences of the development process for small sites.

3.41 There are, of course, some differences in the position of individual boroughs; this is inevitable as a result of the variations in geography, past trends in development and the differing drivers in each borough in terms of the preparation and application of planning policy.

3.42 In general, the following key points for further analysis are highlighted as a result of the summary:

- The Role of and Relationship with Existing Planning Policy;
- Impact on Resources and the Effectiveness of Alternative Policy Approaches and Tools including Design Codes;
- Conflict with the Delivery of Large Sites;
- Assessment and Understanding of Local Character; and
- The Achievability of Development including Timescales, Availability of Sites and Land Assembly

4. Literature Review

This section of the study informs the wider 'Stage 2' critique and sets the context for a detailed review of the GLA SHLAA 2017. The extensive list of sources identified for the review illustrates the existing nature of wide-reaching discussion on the factors affecting the development on 'small sites'. Whilst some of the information is of a general nature, greater specific focus is placed on evidence that specifically takes account of relevant issues in the context of West London. The key findings of the literature review substantiate areas of concern on the SHLAA methodology and the need to address in greater detail the capacity for development on 'small sites' and the factors affecting delivery.

Introduction

4.1 Undertaking this literature review as part of the critique provides a structured opportunity to explore in more detail the concerns (outside of the methodology for the GLA SHLAA 2017) identified by the West London Boroughs. It represents an opportunity to provide wider contextual understanding of the local knowledge demonstrated in representations by the individual boroughs.

4.2 The literature review serves to highlight that the evidence base to consider the development process for smaller sites and the contribution they can make to future supply extends far beyond the SHLAA. Many of the sources quoted comprise evidence base documents for the emerging London Plan, albeit in most cases they cannot directly be shown to contribute to the targets for 'small sites'.

4.3 We use the literature review to seek to identify material which can be directly attributed in terms of how it appears to inform the GLA 2017 SHLAA's modelling assumptions for small sites. In the same way we attempt to highlight links that identify recommendations on policy tools and approaches that the draft London Plan 2017 seeks to employ and put into place through draft Policy H2.

4.4 Certain links can therefore be found to demonstrate opportunities to support increased rates of development on small sites and the potential benefits in seeking to achieve this. However, the purpose of the literature review is to demonstrate that these opportunities must be understood in the context of a wider analysis of factors affecting development. In many cases the same sources discuss these opportunities alongside constraints on the delivery of small sites including the role of the development process itself or the relationship with other pressures on land use or housing demand.

4.5 In other instances, these constraints need to be understood in the context of wider sources and secondary evidence such as the Census or input from key stakeholders in the development process. Nonetheless, the findings of this evidence can be justified as material considerations for policy-making and an understanding of the associated impacts on potential spatial patterns and levels of development is central to testing the effectiveness of draft Policy H2. We particularly focus on the aspects of the literature that may relate specifically to factors affecting development in West London and may directly substantiate and illustrate concerns amongst the constituent boroughs. This in-turn justifies the need to test the impacts of draft Policy H2 to understand how it will operate in practice and its likely effectiveness.

4.6 The literature review is supported by a full bibliography included at Appendix 1. From the range of evidence considered it is possible to summarise key organisations, stakeholders, sources and concepts that frame discussion. These are introduced and defined as part of the relevant sub-headings within the discussion. Findings regarding barriers to delivery in the literature review are largely supported by the stakeholder engagement undertaken and presented in Part B to this report.

4.7 We would identify that an understanding of the concept of **'Good Growth**' should be read across the different themes within the literature review. This concept has gained increasing prominence over recent years and through its links to a range of evidence is now an important component of the draft London Plan 2017. Understanding of the concept has in-particular been developed by the work and material associated with the Mayor's Design Advisory Group. Good Growth recognises that London is growing and will continue to grow, however acknowledges that growth in the past has not always been managed sustainably.

4.8 Good Growth is the concept which underlines the policies in the draft London Plan 2017 and attempts to mould a city that is a pleasant place to work, visit and stay. It also aims to deliver a balanced mix of young and old residents, housing tenures and jobs. Good Growth attempts to enrich the city's public and civic spaces, allowing for vitality and change to build on the character and appeal of London. Another aim of good growth is to provide integrated infrastructure and services. The qualities of good growth include demonstrating an understanding of local character and can be secured through measures such as setting and applying development standards and ensuring the quality of design outcomes. While the concept is diverse it is fundamentally a core objective of the draft London Plan 2017. Its application in practice is therefore relevant to assessing the effectiveness of all policies in the draft London Plan 2017, including the proposed approach towards development on small sites and understanding its potential wider impacts on the Good Growth theme.

Characterisation of London's Towns

An Understanding of Character

4.9 The literature review illustrates that the West London Boroughs' concerns can be substantiated with reference to wider evidence. This indicates that potentially greater weight should have been afforded to these aspects when seeking to develop modelling assumptions for small sites. These findings provide an important context for the remainder of the literature review.

4.10 LB Harrow's representation states open space is a strong character of Metroland, and much of this open space is provided on land which may be considered as small sites for development. Such open space also assists in the mitigation of flood risk. LB Harrow argues that developing such sites is contrary to the Mayor's strategy for London to be 50% green by 2041. LB Ealing's representation expresses a similar concern that the provision of small sites makes acceptable the loss of designated green space or sites of importance for nature conservation.

4.11 LB Barnet's representation expresses concern that the small sites policy could open the way to the demolition of family housing to create inappropriate flatted development which could significantly alter the character of parts of the borough in an uncontrolled way. LB Brent's representation also argues that the small sites policy regards the character of outer London as dispensable.

4.12 It is reasonable to highlight the extensive range of existing commentary and evidence illustrating the importance of assessing London's diverse and changing character when considering and implementing planning policy. These issues have framed a variety of research, such as London's Towns – Shaping the Polycentric City (New London Architecture Insight Study, October 2017). The focus for recommendations within the study seeks to reconcile aspirations for 'Good Growth' with London's diverse drivers for different land use needs and existing patterns of development.

4.13 This recognises that future prospects for development will change to reflect new technologies and transport investment, within the overall context of more activity being redistributed from central London. In some cases, successful examples of regeneration and centre-focused redevelopment can already be demonstrated, but in future years the pressure for development and the range of alternatives are both expected to grow. For London as a polycentric city, these opportunities are seen as important to connect existing routes and capitalise on (in-particular) Outer London's role in the wider south-east region.

4.14 The study also highlights that these opportunities are shaped by existing geography and patterns of land use and previous expansion. Whilst the expansion of individual industries and historic road and waterway connections led to some specific directions of growth the New London Architecture Study recognises the 'furious growth of the railways' as central to rapidly shaping character, particularly in West London. Specific innovation, such as development patterns incorporating semi-detached housing are recognised as *"literally the building block of north-west London's characteristic 'Metroland' neighbourhoods along the Metropolitan line, such as Harrow and Pinner, as cheaper mortgages opened up private home ownership to more people."*

4.15 Understanding the evolution of this pattern of development also needs to take account of subsequent controls on land use and technological change. Suburban London is divorced from the later era of New Town development through establishment of the Metropolitan Green Belt. This provides an impression that *"London suburbs suddenly stop, frozen at the point they had reached in 1939"*, with significant amounts of post-war housing and industrial development diverted outside of London.

4.16 The Report *"Capital Gains: A Better Land Assembly Model for London"* (Urbed for the GLA, February 2018) notes that these previous patterns of Metroland development were enabled by significant investment in infrastructure (both arterial roads and extensions to the Underground network). Development along these routes, and in-particular expansion in car ownership, led to resistance of urban sprawl but also fostered greater dependence on private vehicles in outer London itself. This is reflected in subsequent trends in land use such as out-of-town retail and road-based transport schemes affecting outer London's centres. Later economic restructuring has resulted in the further loss of employment from outer London and significant population change. However, the pattern of suburban development and function of existing centres has been largely maintained. In-particular, the features of residential development associated with Metroland continue to remain in generally high demand and exert a significant influence on local character.

4.17 This complex past is potentially significant for future management of development and successfully implementing 'Good Growth'. The findings of the New London Architecture Study (2017) suggest that:

> *"An understanding of character – especially the aspects of the physical environment that give a place identity and meaning for the people that use it – is therefore vitally important as a basis for planning for future growth and regeneration. This is an especially complex process in London because of the historic layers of development and infinitely varied cityscape."*

4.18 Any such assessment is inherently complex and may not always take equal account of factors such as historical influence or political perception. Amongst the most comprehensive analysis is that provided by 'London's Local Character and Density' (Allies and Morrison for Historic England, 2016). This takes account of a wide range of land uses and development patterns, concluding that the ratio of gross floor area to plot size ('floor to area ratio') is likely to provide the strongest indication of the adaptability of buildings and scope to remodel or intensify development. Character areas common in West London, including 20th Century suburbs and railway town centres, demonstrate a narrow range of typically low floor-to-area ratios, indicating potentially higher sensitivity to change.

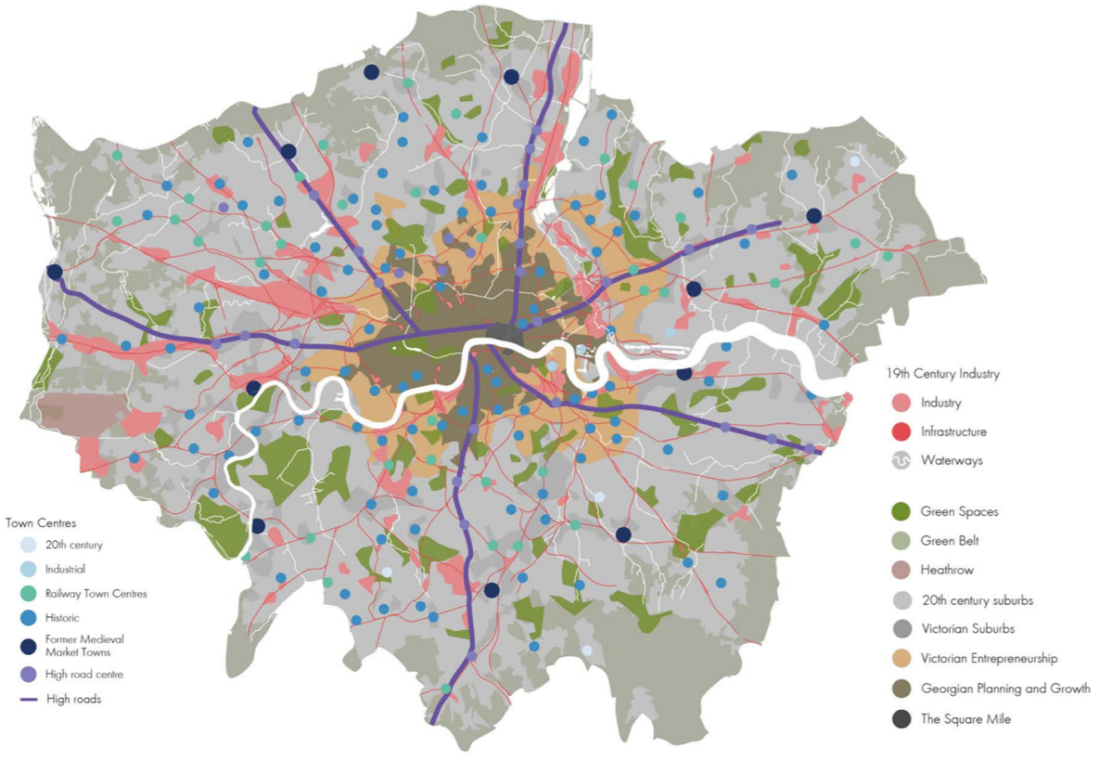


Figure 4.1 Character Map of London taken from London's Local Character and Density Allies and Morrison (2016)

4.19 It is not within the scope of this assessment to provide a full Character Assessment for the West London Boroughs. However, as a result of these findings from the literature we will go on to consider how existing tools such as the SHLAA Character Map might be employed as a further input to the modelling assumptions for small sites. It may also be relevant to highlight where other land use designations or physical characteristics may act as a proxy for local character and justify an alternative to the modelled approach.

Assessing Character as a Function of Capacity for Development

4.20 The findings of 'GLA Density Project 4: Exploring Character and Development Density' (Arup for the GLA, May 2016) demonstrate how the evidence base for the draft London Plan 2017 has sought to re-examine the relationship between character and density and contribute to the objective assessment of housing potential to inform the planning framework for the City. Notwithstanding the draft London Plan 2017's Policy D6 and provisions to optimise housing density and opposed to seeking strict application of the Sustainable Residential Quality / Density Matrix the assessment of housing potential on Large Sites assessed by the SHLAA remains directly informed by the SHLAA Character Map.

4.21 Density Project 4 identifies significant strategic benefits from application of the SHLAA Character Map to identify notional housing capacity. A number of helpful updates have been applied in recreating and updating the Character Map in the 2013 SHLAA to better reflect dwellings as recorded in the 2011 Census; and the Town Centre Hierarchy of the London Plan. This ensures that the Character Map reflects London's spatial character and remains a useful strategic planning tool. One significant component of the update is to adopt a more refined application of distances from town centre boundaries. The key alternatives deployed are the adoption of a 960m (rather than 800m) walking radius to better reflect current data on walking speeds (and distance covered in 12 minutes).

4.22 To more accurately represent actual walking distances from existing centres, and echo more closely appropriate characteristics for higher density developments, these distances are mapped according to existing movement networks. These 'ped-sheds' are applied from a networked radius of the actual town centre boundaries, as opposed to a single point using 'crow flies' distances in the 2013 Character Map. Whilst the project acknowledges that use of 'crow flies' distances creates a larger area where greater potential for housing capacity is identified, it concludes that *"the benefits of the network buffer are also clear, in that they more accurately represent areas which fall within actual walkable catchments. This is more closely aligned with the original intentions of the 1998 and 2000 matrices"*.

4.23 Recommendations on the clear scope to refine and update the SHLAA Character Map emphasise its strategic role and clear relationship with the original principles of the Sustainable Residential Quality Matrix to provide for renewal of Town Centres and deliver development. Urging simplicity, the report concludes that the map is based on appropriate criteria: *"Definable, quantifiable and map-able locational characteristics such as proximity to centres and arterial routes are perhaps better suited to the purposes of the SHLAA map, which is designed to give an overall strategic level indication of setting in order to estimate the notional capacity for housing across London."*

4.24 Proposed recommendations for use of the Sustainable Residential Quality Matrix itself suggest removal of separate criteria for arterial routes and town centres, largely already reflected in PTAL Ratings applied as headers to assess character and potential development outcomes. Whilst recognising that such changes may make determination of appropriate setting more subjective, this was considered consistent with the thrust of suggestions of individual boroughs and users of the matrix.

4.25 However, whilst the use of the character assessment is supported as an input for the small sites assessment there remain reservations. It is considered that the methodology used to define the SHLAA character map is overly simplified and the limited choice of parameters and the appropriateness of these parameters as a measure/proxy of setting provides a crude and inaccurate measure. Taking account of local context and character, and recognition of the matrix as a starting point to determine what is appropriate for any individual site were specifically flagged in responses to the Outer London Commission supporting the review of the London Plan.

Measures of Connectivity and Their Relationship with Character and Identifying Development Opportunities

4.26 This sub-section is not solely related to local character but is most appropriately addressed here because of the long-standing connection between a development's Public Transport Access Level (PTAL Rating) and Character Setting in determining the capacity for development. PTAL rating is equally important for the identification of 'modelled' targets for development on small sites (albeit in a different format) as the basis for identifying potentially suitable locations for intensification. It is therefore relevant to evaluate PTAL ratings in the context of other recent discussion on measures that may more broadly indicate outcomes for sustainable development.

4.27 Transport for London (TfL) plays an important role in shaping planning policy for the city. London's transport network exerts a significant influence on land use and patterns of growth and development. Understanding how patterns of movement change and affect individual users and land uses, and how these trends might evolve as a result of future investment or changes in lifestyle is recognised as important in terms of achieving good growth and meeting the overall need for development.

4.28 We would highlight the contribution that TfL has made to this evidence through the presentation of findings in 'Connectivity data to inform spatial planning – Exploratory Analysis' (TfL, 2016). The broad context is that while PTAL remains an important measure for the component of policies on development criteria (e.g. density) a further understanding of impacts is required. PTAL is considered only one measure of connectivity; other factors like character setting, access to jobs and services, as well as access to central London are also relevant.

4.29 For any location in London, the PTAL combines information about the proximity of public transport services and the frequency of these services during the morning weekday peak. PTAL does not consider the locations or services you can reach or proximity to a town centre. It is also a function of the calculation of PTAL that a different distribution of services at other times of the day may be relevant to use of the transport network. Higher propensity for use of the private car and lower uptake of public transport correspond to the following main conclusions:

- In areas of low public transport provision than in areas of high public transport provision.
- In areas of low population density than in areas of high population density.
- In areas which are further from central London than areas which are closer to the centre.
- In areas which are further from rail stations than in areas which are closer to rail stations.
- In areas which are further from town centres than in areas which are closer to town centres.
- In areas from which more jobs can be accessed within 45 minutes by public transport than in areas from which fewer jobs can be accessed within 45 minutes by public transport.

4.30 This wider range of indicators provides a set of tools to provide more detailed testing of policy options and potential impacts. They may have a more significant relationship with future patterns of sustainable transport use and a long-term effect on achieving sustainable development. It is evident that the GLA's small sites modelling assumptions represent a very specific application of PTAL data and have limited regard to wider measures of connectivity.

4.31 Furthermore, the more nuanced measure of connectivity would indicate that there may be potential risks with the GLA's application of equal weight to the criteria for locations within either PTALs 3+ or 800m of a station or town centre in determining whether the *presumption in favour of small housing development applies*. Whilst only one of these qualifying criteria needs to be met for the *presumption* to be applied, measures of connectivity would indicate a relationship between the factors. This is particularly significant in terms of the implications for supporting increased rates of development in areas of poor public transport accessibility (but otherwise within relevant 800m buffers). In these instances, physical effects such as barriers to accessing the town centre on foot or the prevailing low density of housing may act as strong incentives on use of the private car.

4.32 The TfL analysis used a range of responses from the London Travel Demand Survey (LTDS) to indicate trip patterns. This includes measures such as all 'home-based' trips likely to reflect a range of movements to meet day-to-day needs (i.e. travel to access education or retail facilities). It finds significant differences in use of the private car as a mode of transport based on the relationship between connectivity indicators. However, whilst the average changes quickly between categories (e.g. proximity to employment) there is inevitably a range of findings down to individual ward level. This is therefore a topic we have identified as potentially appropriate for further analysis.

The Development Process on Small Sites

4.33 A common theme within a wide spread of literature looks to outline the experience of development on small sites and identify key issues in terms the reasons for patterns and levels of activity observed. Although their role and contribution is not limited to this section, identifying a number of key groups and organisations assists in understanding sources of information and the context for discussion.

4.34 Key evidence is provided by organisations with a specific role in the London context and whose remit is specifically directed towards factors affecting outer London.

4.35 The **Outer London Commission** (OLC) was established by the previous Mayoralty and included representatives of business, the boroughs, the development industry and the voluntary sector. The OLC is no longer operating, however as stated on the GLA's website, the Commission was reconvened between December 2014 and February 2016 and it's 4th-7th reports form part of the evidence base used to inform the full review of the London Plan. The OLC looked broadly at factors affecting economic performance and explored how different parts of outer London could better realise their economic potential in town centres, opportunity and intensification areas, industrial locations and in business growth hubs. It is specifically the 6th and 7th Reports ('Removing Barriers to Housing Delivery' and 'Accommodating London's Growth) that are most relevant to this literature review. These provide recommendations, broadly informed by supporting material obtained or commissioned by the OLC, whose application can be observed in draft Policy H2 and the targets for development on small sites.

4.36 Amongst organisations making key contributions to the discussion, the **London Chamber of Commerce and Industry (LCCI)** has over 2,000 members from 'Small and Medium Enterprise Builders' (SMEs) to large multi-national corporates, operating in a wide range of sectors across the 33 London boroughs. The LCCI promote the interests of the business community through representations to government organisations. The LCCI is frequently referenced in material seeking to demonstrate the context for development activity in London.

4.37 The **Federation of Master Builders (FMB)** is the UK's largest trade association in the building industry representing thousands of small and medium sized construction firms. The FMB is independent and non-profit making and lobbies for members' interests at national and local levels. It represents one of the key organisations most frequently referred to as an authority on the wider development process.

4.38 Reflecting the importance of housing delivery to the capital, a substantial volume of data on the development process is captured within the London context. **Molior** is a market research consultancy concentrating on the residential development industry and covers all of the 33 London local authorities. The four main research sectors they cover are: sales research, looking at what is being built where and by whom; land and planning including planning applications, decisions, appeals and permissions; sites pre-planning, examining details of development potential and site owner details on more than 2000 London development sites; and build to rent, tracking who the active participants are in London.

4.39 As well as the specific contributions that these organisations and the associated literature makes towards the preparation and understanding of planning policy (including draft Policy H2), the wider context of policy on housing need is also relevant.

4.40 **The Mayor's Housing Strategy** sets out the Mayor's policies and proposals to meet the housing supply shortage in London. It also sets out the strategy for affordable housing investment and delivery. The latest Housing Strategy was published in May 2018, following consultation on a draft Housing Strategy in December 2017. The Housing Strategy includes recommendations for policy in its own right and also draws upon its own evidence base – the ***'Housing in London'*** series. This provides one of the key introductions to identifying that pressures on the demand for housing and the use of dwelling stock are differentiated across London. 'Housing in London' itself draws on secondary evidence such as the Census. This material has links to the wider literature both in terms of overall factors affecting development on small sites and whether these can be differentiated in West London.

Capacity of the Industry and Constraints on Activity

4.41 The Mayor's Housing Strategy acknowledges that there are a number of barriers to delivery for SME builders, stating that delays and the financial costs associated with gaining planning permission are particularly problematic for SME builders because they work on just one or two schemes per year, and are thus unable to spread risk over a number of sites similarly to large developers.

4.42 The Housing Strategy states that draft Policy H2 will address these issues within the planning system through introducing a new presumption in favour of small housing developments, alongside specific delivery targets for councils and through clearer, streamlined planning processes such as Permission in Principle (para. 3.88). However, this statement is independent of any testing of policy impacts in terms of specifically indicating how levels of activity can be expected to change and over what timescale.

4.43 The Housing Strategy also states that the Mayor has amended the Mayoral CIL instalments so that more smaller scale residential development schemes can benefit from the instalments policy (para 3.90). This is largely in line with the advice from the LCCI report (2015, pg. 5) which advises that Local Authorities should allow developers of sites under 50 units to defer payment of the Community Infrastructure Levy (CIL) until the homes have gone to market in order to encourage SMEs. In truth this demonstrates that the Housing Strategy is only partly able to identify how potential constraints to development have been overcome. For example, there are likely to be substantial lead-in times, and potentially significant implications for infrastructure funding, associated with individual boroughs introducing revisions to the phasing of CIL payments.

4.44 An objective reading of available comments illustrates that any potential change in industry capacity and measures to facilitate activity must be benchmarked against the current position.

4.45 The LCCI representation to draft Policy H2 argues that small building firms are vital to addressing the capital's housing needs, however evidence from the Home Builders Federation (2017) states that the role SMEs play in the housing market has declined: in the early 1990s small housebuilders were responsible for 39% of all homes constructed in the UK, falling to just 12.5% in 2017. The LCCI cite the fact that small sites are hard to develop by SME builders in the capital as a reason for this. Research presented by the LCCI found that the barriers small builders face to delivery include: inefficiency due to lengthy procedures; inconsistency between the London boroughs; uncertainty over section 106 commitments; and uncertainty due to frequent changes in the rules and procedures. The LCCI also cite access to land and securing finance as significant barriers to delivery. They argue that a more streamlined planning process should be developed for small builders to ensure that cost and risk is minimised.

4.46 The Housing Strategy, citing the evidence of the OLC's 6th report, recognises that the contribution of small sites to housing supply has fallen over the last decade: in the eight years to 2014 completions on small sites fell by half, and the decline was even more pronounced in outer London and on very small sites under 0.1 hectares (para 3.20). This report cities evidence from the Federation of Master Builders (2016, pg. 3) who argue that the reason for this is as a result of obstacles like the availability and cost of land, the speed and efficiency of the planning system and access to finance.

4.47 The Housing Strategy notes further that homebuilding in the UK, and particularly in London, has become increasingly dominated by large construction businesses. Small sites, however, are unlikely to be attractive to larger construction firms (para. 3.84). The report acknowledges that there are a number of barriers to small and medium enterprises (SMEs) building more homes in London: this report cites the evidence of the Home Builders Federation (2017, pgs. 14-16) who note that in 1998 12,000 SMEs were responsible for building 40% of new builds compared with 2,500 SMEs producing 12% in 2017.

Development Viability, Cost and Complexity

4.48 The OLC 6th report (2016) highlights that the decline of SME builders is also as a result of the complexity and cost of planning. This report refers to the research of the NHBC Foundation (2014, p.5), whose survey results found that the main planning issues impacting SME builders are: the time it takes to obtain planning permission, discharge of pre-commencement conditions, the upfront costs of planning application fees, Section 106 obligations and CIL.

4.49 The HBF (2015, p. 46) also note that the excessive cost of submitting an outline application and uncertainty about the planning committee's decision deter SMEs from submitting applications, irrespective of site size; the application costs must be borne by the SME as lenders will not provide loans without outline permission. These are obviously factors that would be exacerbated by the asking price for land, potentially imposing a fundamental constraint on the availability of sites.

4.50 The OLC subsequently recommend that reducing the cost of planning applications for small sites under 10 units would assist small builders, providing that this would not reduce the speed of the planning process.

4.51 The complexity of the planning requirements and technical regulations has also contributed to the decline of SME builders, as the planning process requires a significant amount of their time and resources. The OLC (2016, p.69) state that it would be difficult to change or simplify the planning system for solely SME builders, however postulate that simplifying the planning system and having more geographical consistency in planning legislation would assist developers of all sizes.

4.52 The OLC 6th report (2016, p. 72) also notes that existing CIL payment requirements are a barrier to small site delivery, as a result of the fact that CIL payments are due when construction commences, unless local authorities have an adopted instalment policy. The NHBC (2014, pp. 5-6) note that such up-front costs can have a substantial impact on finance issues facing small builders in London, especially in view of the cost of acquiring land in most London boroughs and the difficulties small builders face in accessing finance. The OLC (pp.72-73) argue that CIL payments on sites under 10 units should not be required until

development is completed, or the first dwelling is sold. Partial implementation of these recommendations can be observed within the proposed approach to draft Policy H2, which encourages boroughs to adopt flexibility in when CIL payments are due. However, as we have indicated these provisions have not been tested through the GLA SHLAA 2017 in terms of how widely they will be applied or how quickly they might lead to an increase in rates of development.

Implementation and Deliverability of Planning Permission

4.53 The OLC 6th report (Executive Summary, 2016, para. 1.13) proposes that a significant barrier to meeting housing need in London is the fact that many approved units are not translated into completions. Using the evidence in the London Development Database, the OLC show that London boroughs consistently grant planning permission for over 50,000 homes a year, a figure that is around double the number of homes that are actually built. The OLC acknowledge that translating the approved units into completions is critical to addressing London's housing need. However, the OLC report also acknowledges that if all the planning approvals were delivered over the next 5 years then this would only provide enough housing to meet London's annual housing requirement up to 2020 (para. 1.15).

4.54 The OLC cite the evidence collected by Molior in their Barriers to Housing Delivery (Update, 2014, pg. 16), which found that the existing pipeline of units (planning permissions not built out or lapsed) are not necessarily deliverable within the time-frame of the draft London Plan 2017. Molior's report (pg. 17) demonstrates a reason for this: permitted large sites are owned by non-developers and as such are land-banked. Sites such as these account for around a quarter of London's pipeline of consented units on large sites.

4.55 Similar findings by Savills in their Market in Minutes: UK Residential Development Land (Feb 2016, pg. 02) report raises concerns about the extent to which planning permissions are being secured in order to increase the commodity value of sites. Their analysis of the development pipeline in England as a whole showed that a significant proportion of sites with outline and pre-planning permission are owned by promoters, investors and the public sector, as opposed to house builders, registered providers or developers. As the sites obtain full planning permission ownership of the sites changes with 83% of sites with full planning permission being owned by house builders. However, Molior (2012, para 2.8) found that, problematically, on 45% of the permitted sites the planning consents secured by non-developers were not designed for delivery, having one or more issues which made them difficult or impossible to build.

4.56 Understanding the relationship between housing commitments (in the form of planning permission) and the implementation rate to translate this pipeline into housing completions is a topic of national interest. Most recently this is indicated by the Letwin 'Review of Build Out Rates' albeit in this case the focus is on large development sites. Within more general discussion Ruth Stanier, then Director of Planning at the Department for Communities and Local Government, in her presentation to the Home Builders Federation Planning Conference in 2015, also demonstrated evidence showing that although permissions are granted for sites, these sites are not necessarily built out for many years or in some cases at all. The dataset presented states that in September 2015, 620,000 units had either detailed permission or reserved matters granted, however 305,000 of these projects were yet to make a start (49%). She states that in recent years, there is a gap of around 30-40% between the number of permissions given for housing and starts on site within a year. Of the total amount of permissions 10-20% do not materialise into a start, with permissions 'dropping out' and on 15-20% of the sites re-permission is sought.

4.57 The GLA, acting as part of the Wider South East Officer Group, has previously presented evidence to the government to demonstrate that the overall pipeline of housing commitments in London is typically larger than that given in national statistics. This is because whereas the London Development Database records all applications for schemes of all size, information reported by MHCLG ignores certain types of development including schemes proposing fewer than 10 units. Whilst these findings are helpful as an overview of all activity in the development process they reveal relatively little on implementation rates or timescales for development. Given the relatively stable historic rates of development on small sites this would in-fact indicate a greater proportion of proposals requiring revision or lapsing altogether.

4.58 This highlights one of the key fundamental concerns with the assumptions for small site modelling. The 1% yield growth rate acts as a proxy for existing dwelling stock coming forward for intensification and is a measure of ***supply***. However, in the context of draft Policy H2's targets for small sites these represent a requirement to ***deliver*** net housing completions from this component of supply as opposed to being an indicator for land supply monitoring only. Assessment at the supply stage should have greater regard to 'deliverability' of targets i.e. the pattern of implementation of planning permission and any adjustments for a lapse rate. Targets for completions are inflexible and do not allow further assessment of deliverability albeit any shortfall arising against these, including for matters outside local authority control, and would require rates of development over and above the SHLAA's assumptions.

4.59 These are aspects that can therefore be concluded as being given insufficient attention within the methodology for the GLA SHLAA 2017. Whilst we have highlighted the importance of these aspects through the literature review they are more appropriate for further analysis under the Part B: Delivery element of this assessment. This is because evidence available in the London Development Database can provide a thorough understanding of the life-cycle of individual schemes.

The Role of Suburban Intensification and Other Policy Approaches

4.60 The concept of suburban intensification as an opportunity to yield increased rates of housing growth has gained prominence within the evidence considered by this literature. As we have highlighted a significant proportion of this literature comprises the evidence base for the review of the London Plan and it is therefore logical that links can be identified between resulting recommendations and the specific approach to small sites adopted in the GLA SHLAA 2017.

4.61 Suburban intensification is introduced within the OLC's 6th Report as part of a wider discussion on the contribution that existing housing stock might make to overall levels of net additional supply. The OLC's 7th Report explores 'suburban intensification' as a specific growth option. Both sources report on essentially similar material received through submissions to the panel and an understanding of wider factors affecting development.

4.62 There is a substantial similarity in the recommendations which we explore further below. However, it is useful to note that the 7th Report provides more geographic understanding of how selective areas for densification might be identified. The 6th report has a more general focus and highlights a range of initial recommendations. These seek to encourage further exploration of indicators (e.g. public transport accessibility) that suggest the range of potentially suitable opportunities for development and how different delivery models might be supported where these qualifying criteria are met e.g. with increased rights for Permitted Development.

4.63 The greater number of recommendations within the 6th Report suggest a wider range of options and a number of more or less 'hands-on' changes to planning control. However, the commentary and recommendations are qualified with recognition of the wider development process and other barriers to this type of development, such as declining rates of residential conversion in recent years. As a starting point the recommendations also indicate a need for further research into these barriers.

4.64 The relationship between these wider findings and their contribution to the modelled approach to develop specific targets for small sites is of fundamental importance. We highlight that whilst many of the OLC's recommendations are a starting point the GLA 2017 SHLAA methodology instead looks to employ principles from some of the supporting material, including locations for development and indicators for development capacity (i.e. the 1% yield growth rate) within a specific calculation of supply. This can be considered to be at the expense of testing individual policy options or comparing the impacts of implementing greater support for small sites (including the overall effectiveness in terms of supply). There is not, therefore, a direct link between the outputs from small sites modelling and the wider evidence base for suburban intensification meaning the GLA 2017 SHLAA's conclusions may lack robustness. To expand, the assumptions for modelling are independent from and not linked to support from the potentially necessary policy mechanisms (or changes to legislation) explored within the evidence base. This casts doubt on the deliverability of modelling outputs in isolation and the extent they can be justified in suggesting a significant departure from the past levels of delivery and with insufficient safeguards on the reliability of future supply.

Models and Options for Suburban Intensification

4.65 The OLC, in their 7th Report (2016), look at how suburban intensification has been suggested as a solution to increasing housing supply in London. Recommendation 22 of this Report (set out below at Figure 4.1 The OLC's Recommendation 22) provides the clearest overview of potential areas for further work and policy development to implement this model in practice:

Recommendation 22

The Commission endorses the principle of selective intensification of some suburban areas and of optimising the contribution of smaller sites in meeting housing need.

This principle is already outlined in the London Plan but could be refined and progressed further: . The Commission suggests that the development of the new London Plan provides an opportunity to underscore it. This will have to be done sensitively, not least by working with communities, boroughs, practitioners and developers to further explore how it can be achieved viably in differing circumstances, and without compromising local character and amenity. This in turn should provide the basis for guidance on implementation of refined policy. Priority should be given to promoting suburban intensification in areas of good public transport (PTALs 3 and 4).

The Commission also recommends that there should be greater support for small builders, who are likely to be the principal developers in these types of location. Further details are set out in the Commission's report on Barriers to Housing Delivery.

Figure 4.1 The OLC's Recommendation 22

4.66 Citation of estimates of potential development from suburban intensification during the period during which the OLC was reconvened need to be treated with great care. Essentially, within the course of the reporting period for both the 6th and 7th reports different iterations of material outlining different approaches to the concept were submitted to the panel: reports of estimates of the capacity for development need to be read in context as they may relate to different variants on the approach. This is not necessarily an issue within the overall commentary provided by the OLC as this contributes to a process of evidence-gathering leaving scope for further testing of policy options and impacts. This does, however, represent a risk for the GLA 2017 SHLAA methodology in picking up various principles for suburban intensification (which may cut across different options for the overall model) and without this testing of policy impacts having taken place.

4.67 Two key sources that comprise an overall outline of options for models for suburban intensification are given as follows:

- HTA & GLA. (2014) **Su*rbia***: *A study of urban intensification in outer London – 'work in progress'*
- HTA Design LLP, Pollard Thomas Edwards, Savills and Nathaniel Lichfield and Partners. (2015). *Transforming Suburbia: Supurbia* ***Semi-Permissive***

4.68 Paragraph 4.53 of the OLC 7th Report provides an overview of differences between the two models:

> *"The two approaches have much in common but show distinctively different approaches to planning and delivery; the* ***semi-permissive*** *model proposes a more market-led approach facilitated by top-down planning reforms, while the HTA* ***Supurbia*** *model propose a more consensual approach based on neighbourhood planning and local development orders. Both may require changes to the current planning policy framework, for example the Mayor's policy approach to protecting back gardens, and a change in the views of some outer London local authorities. It was noted that while the introduction of new London Plan policy did reduce the historic scale of output from 'garden' development this nevertheless still remains a significant source of provision in some outer London boroughs."*

4.69 The OLC 6th and 7th Reports summarise potential outcomes for levels of development under either model. The approach to development established by HTA for the Supurbia project (2014, pg. 4) proposes that if 10% of the semi-detached housing in outer London was fully occupied (as opposed to part occupied), this could accommodate an additional 100,000 people; and if 10% of the semi-detached housing was redeveloped at twice the existing density, this

would accommodate around 20,000 new homes per annum (a total of 400,000 over a 20-year period).

4.70 The 2014 Supurbia project anticipates that development will be achieved within focused areas and as a result of specific intervention through the planning system. This would see local planning authorities and local communities working together to promote Local Development Orders and would therefore represent new models for delivery. Whilst LDOs would offer efficiencies as part of the development process (in terms of agreed design solutions and scope for customisation) the focus for intervention on specific areas might also ensure that activity is diverted from areas of more sensitive character and is delivered alongside commensurate benefits for existing communities. One issue also identified alongside focused models for suburban intensification is the need to maintain a balanced mix of land uses alongside increased levels of residential development; in order to avoid a reduction in the level of local services and high levels of out-commuting.

4.71 The OLC agrees that redevelopment of this scale could present a viable solution to increasing housing supply in the suburbs. They note that much of the interwar housing in parts of the suburbs was not built or planned to modern standards and has more recently been neglected. The OLC argue that such housing may provide an opportunity for this type of redevelopment and intensification if located in areas with higher PTAL ratings (indicating good accessibility to public transport).

4.72 The OLC's recommendations suggest further exploration of whether instead of the piecemeal intensification described above, a more managed approach to redevelopment and densification is essential to ensuring that changes are beneficial to the area as well as having a positive effect on the overall supply of housing.

4.73 The OLC also suggest, however, that intensification has already occurred and is occurring in the suburbs, including basement developments, conversions, increases in household sizes and HMOs. But they also argue that not all of these changes have led to an improvement in the amenity of the area or increased housing supply. This leads to the useful contribution that the HTA Design LLP, Pollard Thomas Edwards, Savills and Nathaniel Lichfield and Partners (2015) update to the Supurbia model makes in demonstrating how less comprehensive, 'semi-permissive' approaches might also support densification.

4.74 The semi-permissive approach is broader in terms of the scope for its geographic extent and application and the proportion of overall dwelling stock that might be employed in opportunities for densification. The Supurbia (2015) study provides a good introduction to West London housing character: homes are low density, averaging only 25-35 homes per hectare, and are under occupied with 40% of

owner-occupied households having two spare bedrooms. Further, occupants of many suburban homes in use for private rental or multiple occupation tend not to use large gardens to their full potential and have high levels of car ownership (leading to loss of front gardens and potentially detrimental effects on local character).

4.75 The Supurbia report notes that doubling the density of 10% of the outer London Boroughs would allow for one million new homes, but that suburban homeowners within outer London are amongst the groups most resistant to new housing development. However, the scope for net additional homes estimated under the semi-permissive approach actually indicates a more conservative range depending on the participation rate of existing dwellings and the growth factor arising from proposals. For example, a 10% participation rate where an additional home per existing house is generated would lead to a net gain of around 73,000 dwellings. It is not clear what the basis for the 10% assumption is.

4.76 The solution to enable development under the semi-permissive approach envisages a system operating under rights for Permitted Development potentially applicable to use by single homeowners rather than requiring the preparation of area-specific Local Development Orders for comprehensive redevelopment. This would facilitate a mechanism by which a range of design solutions can be pre-approved and householders can select their preference from if they so wished. This should be broadly interpreted as a system of 'plot-passports' appropriate at a neighbourhood level and capable of securing acceptable development outcomes. For example, this would involve developing on back gardens or developing larger developments in collaboration with neighbours. The key goal of the semi-permissive approach is to facilitate a wide range of opportunities to encourage development. The Supurbia report argues that such development would have a realistic level of financial incentive (£110,000-210,000 per household) for homeowners to exercise their redevelopment options.

4.77 The research suggests that the approach should be interpreted within the already wide range of Permitted Development options for extensions and adaptations to existing homes. However, current rules do not allow for buildings to be constructed within the land that surrounds a house for the purpose of being lived in, so allowing this through the semi-permissive approach would streamline the planning process, offering further incentives to homeowners. Supurbia suggest that designs for a range of accepted typologies could be adopted within the framework of Local Development Orders, which would enable the rapid adoption of high quality typologies.

4.78 HTA (2015) argue that the Supurbia concept would free equity in relatively poor-quality private housing stock by facilitating home owners to participate in development which they will profit from and will both increase supply and improve neighbourhoods.

4.79 The semi-permissive approach should not, however, be interpreted in the context of limited overall controls on development or without recognition of the lead-in times for implementation given it represents a departure from the normal development management process. Suitable typologies are first anticipated to be established under a design-led approach. This would demonstrate how development standards (e.g. London space standards) and acceptable measures to preserve amenity (e.g. minimum back-to-back distances) would be secured within each 'plot passport'. This would be enhanced by the role of the GLA to prepare a Supplementary Planning Document (SPD) providing minimum design standards for Semi-Permissive development. A Design Statement would accompany the Prior Approval application.

4.80 The semi-permissive approach would continue to ensure other requirements are satisfied as part of the development process. These would apply controls over parking requirements (depending on location); other technical evidence to be provided (e.g. Flood Risk Assessment); and continue to seek either Community Infrastructure Levy contributions, a standard template planning obligation and financial contributions towards affordable housing. Evidently from a legislative and procedural perspective (including the relationship with national policy and guidance) these measures would represent a need to adapt current practice and standards.

4.81 Notwithstanding that this model for suburban intensification only represents the foundations for increasing supply it is the framework for 'pre-conditions' on the applicability of Permitted Development Rights that resonate especially closely with the GLA's 'small site' modelling assumptions.

4.82 Geographic criteria, such as locations within 800m of stations, would be expected to govern where the approach applies. Other exclusions, such as Listed Buildings and areas designated as Conservation Areas, have a high resonance with the 2017 GLA SHLAA inputs. Proposals would need to ensure a net gain in dwellings is also achieved. Finally, the yield growth rate for a 1% participation rate of existing dwelling stock per annum in the SHLAA broadly aligns with forecasts in the semi-permissive model, which claims: *"Logistically we could intensify 10% of outer London boroughs every 10 years"* (i.e.: 1% every year).

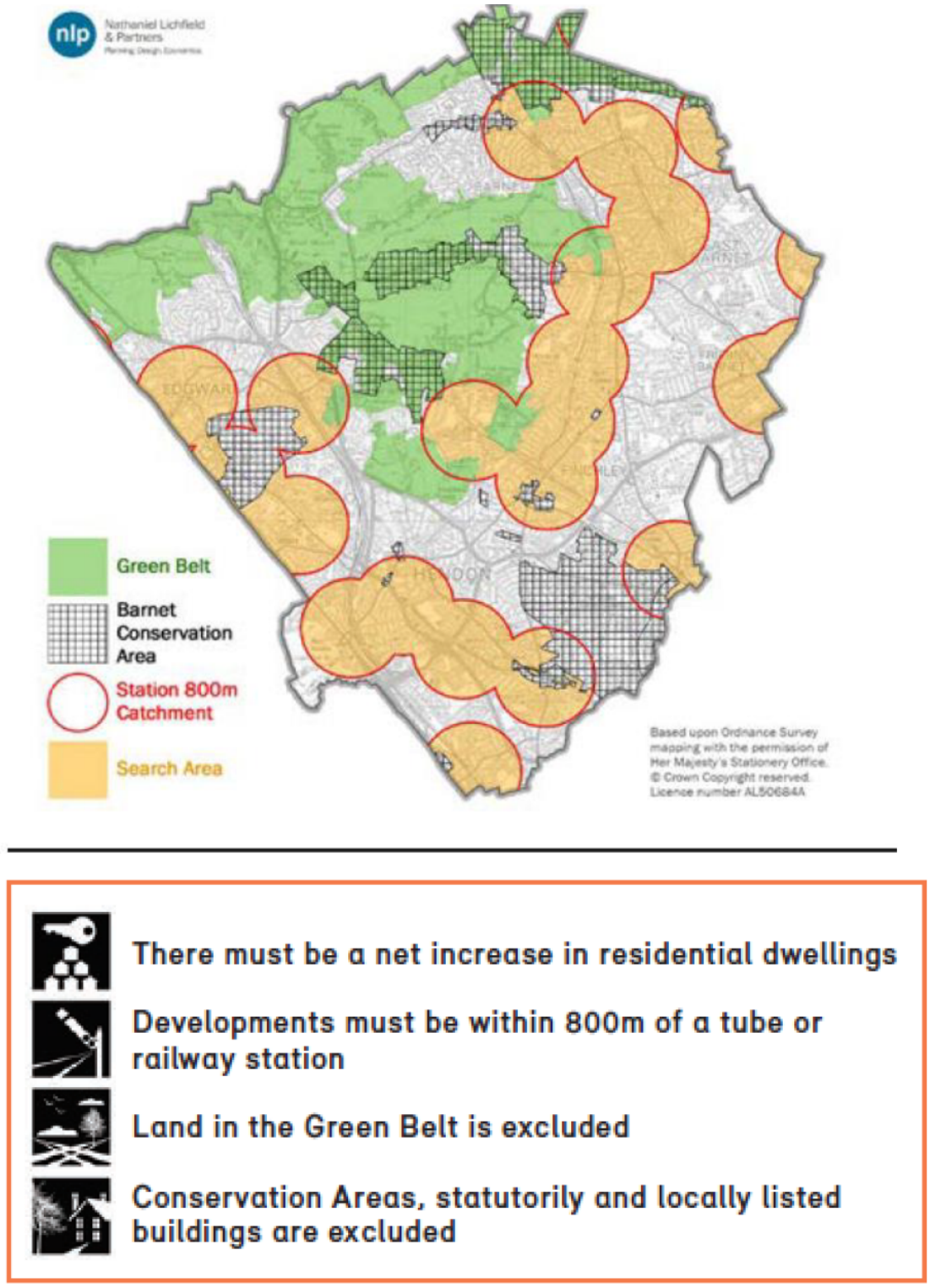


Figure 4.2 Suburbia Semi Permissive Intensification Model

4.83 However, these locational criteria represent only one of the several conditions discussed above and are by no measure the only means of control over development. Furthermore, the semi-permissive model presently provides no indication of the timescales over which measures would be implemented or an increase in supply observed (including allowing time for the development process itself). It should be noted that the recommendation to act on the semi-permissive approach outlined would be to endorse and fund a pilot scheme rather than envisaging broad geographic scope for the measures from the outset.

Identifying Geographic Links With Development Opportunities

4.84 The wider evidence-base and research into opportunities for intensification in outer London indicate that there may be a potential for existing landowners and homeowners to generate existing equity from uplifts in property value. Such outcomes would correspond with an ability to generate greater returns from gross development value compared to estimates based on present-day assumptions. A key assertion in sources such as HTA Supurbia and Semi-Permissive is that a recognition of such uplifts will act as one means of overcoming barriers to the availability of small sites and will act as a potential incentive to encourage new types of development and ensure land comes forward (particularly plots in existing residential use).

4.85 The OLC's 7th Report acknowledges that the substantial variation in London's suburbs includes differences on economic performance, demographics and built form (Paragraph 4.41). Where change has already occurred, it may not necessarily indicate positive outcomes for either housing land supply or impact on local character (for example increases in average household size, basement extensions or use of property as Homes in Multiple Occupation) (Paragraph 4.42). This reinforces the need for a managed approach to understand all of the following factors: capacity for development; delivering changes beneficial to the area; and positively impacting the supply of housing.

4.86 This recognition is an important difference to Paragraph 9.10 of the OLC 6th Report, which more generally associated the under-occupation of dwellings as a means of indicating the scope to enhance the role of existing stock in meeting needs. Demonstrably these characteristics do not apply equally across Outer London.

4.87 Specific property market research demonstrates a more geographically varied view on underlying assumptions likely to govern whether these trends are observed. The reasons for such differences may warrant closer investigation, particularly where they indicate potential for a marked difference in the theoretical capacity for development compared to effects on the availability of land in practice. Two similar pieces of research by property consultancy Savills ("Where Best to Develop and Invest in Residential Property", Spring 2012'; "London Regeneration Boosting housing supply beyond prime", May 2014) help to highlight key indicators. The research suggests that the spatial relationship of these indicators within west London may be weaker than other outlying areas of the capital, and therefore suggests more limited levels of 'hidden value' to unlock greater capacity for development.

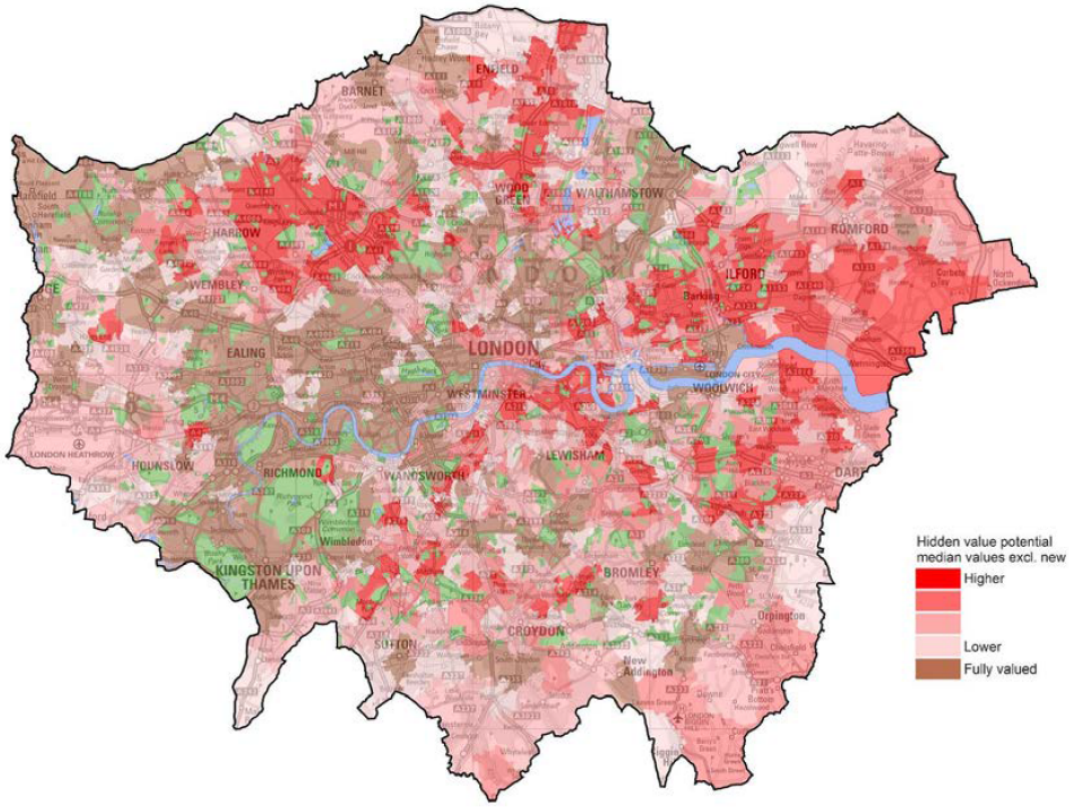
4.88 The premise of both pieces of research highlights that the 'prime' markets of central London have previously offered the most straightforward opportunities, reflected in strong growth in residential transactions and values at the outset of recovery. Pricing of opportunities to reflect these prospects is likely to generate a lower income yield. An increasing need to move beyond 'prime' markets exists where demand for housing remains high overall but opportunities to acquire land at a competitive price in the highest value markets has become constrained. This reflects an inflated pipeline within higher value markets aimed at high equity purchasers that may be regarded as 'fully supplied'. Whilst this does not alter the still unmet demand for mainstream property it makes a strong case for directing activity away from the centre and associated 'prime' markets.

4.89 The Savills research illustrates that the dynamics used to identify this alternative pattern of opportunities are different and can be mapped spatially in terms of the interaction with a range of factors moving away from central London. For example, strong patterns of growth associated with both transactions and values in East London can be correlated with outcomes indicating socio-economic change and gentrification on the edge of central London. These factors are not necessarily confined to inner areas; value can also be unlocked through improvement in transport infrastructure or the quality of placemaking. The Savills research provides an attempt to model opportunities on this basis, though it also notes factors not explored (e.g. quality of healthcare or education and balancing the relationship between reduced travel time and greater cost) may also have an effect.

4.90 The key issue, summarised by Savills (2012) is that "*the trick is to find opportunities to buy at relatively high yield, where growth prospects are not priced into the market. These acquisition opportunities can occur for a variety of reasons, related to distressed debt and the lack of finance for development, as discussed in the table.*" Within the London context the following are key dimensions to identifying hidden value:

- Close to strong markets with scarcity of stock.
- Influence of strong neighbouring markets as demand spills out.
- Investment in infrastructure or place to improve lower market values which can often be associated with the delivery of large sites as a source of infrastructure delivery.
- Associated with large-scale development potentially allows bulk acquisition of new stock and benefits of management at scale.
- Value gaps of 20% are common – where existing property is under-priced relative to transport links and neighbourhood quality.
- Gaps appear bigger where barriers are significant and where regeneration might unlock a more significant upside.

4.91 ‘Hidden value’ can be driven by larger-scale development activity but micro-markets can also exist. However, the relative distribution of these factors, as illustrated by Savills and included within presentation of the OLC 7th Report, shows an overall weaker representation in west London:



Savills, Where’s best to develop, 2012

Figure 4.4.1 Savills (2012) Hidden Value

4.92 The relationship with opportunities on small sites may offer further specific barriers, or weaker prospects of a positive relationship with indicators to unlock hidden value. For example, where demand for existing properties and the form of residential use is high (e.g. as larger family housing or multi-lets) and prices are relatively stable, sites are unlikely to deliver vacant possession or provide for higher yields suggested in the ‘hidden value’ model. In this respect, the use of property in West London (such as observed trends in levels of occupation or concealed families) acts contrary to activity that could otherwise signify ‘hidden value’ for redevelopment.

Other Factors and Support for Other Sources of Supply (including Green Belt)

4.93 It is important to stress that within the literature review small sites are typically recognised as one component among a range of potential options to support housing delivery. Recommendations are provided for a range of components in terms of potential policy mechanisms and the scope to demonstrate through evidence that various components might contribute to increasing levels of supply. The OLC therefore also suggests how measures such as Estate Regeneration as well as focused policy interventions (such as Intensification Areas and Opportunity Areas) provide further options for growth. It is evident that the scope for development on small sites may need to be evaluated against these alternatives; particularly where opportunities may affect one another.

4.94 Calls for a selective release of Green Belt land represent one of the most wide-reaching alternatives proposed by different stakeholders and across different sources.

4.95 The OLC 6th report (2016, paras. 5.26-5.27) argues that selective Green Belt Release in Outer London would help to provide new build housing in more affordable locations. They note that less environmentally sensitive land close to existing tube and rail stations would present a viable option for additional housing. Research from Centres for Cities (2014, pg. 19) suggests that around 432,000 homes could be built on 60% of green belt land that is within 2km of train tube station and not affected by an environmental designation at suburban densities.

4.96 Research by Quod and London First has shown that 14 mostly outer London boroughs have more Green Belt land than land built on for housing (2014, pg.3). Their evidence also shows that only 13% of the Green Belt is publicly accessible (pg. 14).

4.97 The OLC (6th Report, Executive Summary, 2016, para. 2.14) postulate that broadening the sources of housing supply to include Green Belt land could also help to relieve pressures on the continued release of industrial land and reduce London's reliance on large brownfield sites for housing delivery.

4.98 In light of this, the OLC recommended (pg. 65) that the Mayor should, in partnership with boroughs, undertake an initial assessment of the potential development capacity that exists within London's Green Belt on developable land in locations that are accessible by public transport to explore the potential for sustainable urban extensions.

4.99 The LCCI in their representation to the draft London Plan 2017 question how, given historic housing delivery rates and the capitals finite amount of space, a housing target of 66,000 dpa will be achieved. In relation to this, they postulate that much of the land in the Green Belt is underused and that the Green Belt contains 329 hectares of 'brownspace' (derelict and underdeveloped land), which they argue could be used to build up to 20,000 new houses. The LCCI suggest that building on the Green Belt could house emergency service workers. In light of this, they advocate a review of the Green Belt.

5. Principles of the proposed 'small sites' target

As part of the work it has been necessary to understand and illustrate the nature and extent of targets for the development on 'small sites' outlined at Policy H2 of the draft London Plan 2017. In principle this requires an evaluation of the methodology for the GLA Strategic Housing Land Availability Assessment (2017- 'GLA 2017 SHLAA') used to generate the 'small sites' target for individual boroughs. The first component of the assessment, covered within this Chapter, focuses on the foundations for the approach set out by the GLA. This includes taking account of the timeframes for preparing the GLA 2017 SHLAA methodology and engagement with individual boroughs. It also highlights the key requirements within national policy and guidance to establish supply from 'windfall' components and outlines a framework to establish whether the GLA SHLAA 2017 robustly addresses these at the outset.

GLA SHLAA (2017)

Overview

5.1 The Strategic Housing Land Availability Assessment (SHLAA) issued by the Greater London Authority in November 2017 represents the composite source of assumptions and reference to key sources used to inform the proposed 'small sites' target in the draft London Plan 2017. The background to this evidence base is significant to the context for this assessment. It is not necessary within the scope of this work to outline in full the methodology for all sources and estimates of supply identified by the SHLAA, although where relevant overlaps between approaches are signalled - i.e. differences in the assumptions for the assessment of 'large sites' and 'small site capacity'.

5.2 Before considering the specific approaches to derive 'small sites' targets themselves it is necessary to set these within the overall timescales for preparation of the SHLAA. The following stages are specifically relevant:

- November 2016 – January 2017: GLA Consultation with London Boroughs on 'draft' SHLAA Methodology.
- February 2017: 'Final' SHLAA Methodology issued, including circulation of 'tracked changes' following consultation on the earlier draft.
- February-June 2017: 'Large Site' Assessment process undertaken.
- April 2017: 'Small sites' trend-based London Development Database data extracts circulated for checking by London Boroughs.

- April-May 2017: one-to-one meetings with London Boroughs on findings (principally to address conclusions on 'large site' capacity).
- September 2017: 'Housing Target Summary' papers issued to individual Boroughs – providing a direct reflection of proposed London Plan targets for 'small sites'.
- 5 October 2017: London Development Database extracts for 2008-2016 for 'small site' completion trends and 'small site' theoretical modelling assumptions and outcomes shared with individual Boroughs.
- Late November 2017: Summary presentation to London Boroughs on SHLAA findings and acknowledgement of lack of consultation undertaken on alternative 'small site' methodology as previously indicated.

5.3 The assumptions underpinning the proposed 'small sites' target within the London Plan arise at a late stage within this timeline. The February 2017 Methodology, which acknowledges consultation undertaken prior to its issue, summarises the following approach with respect to 'small sites':

> ***'Small sites -*** *annual trends in conventional housing completions on small sites under 0.25ha in size (2004/5 – 2014/15), taking into account potential for these trends to be increased through changes to planning policy and scenario testing.'*

5.4 The February 2017 Methodology provides a detailed discussion for the assessment of 'large sites' but in principle the approach does not depart from previous iterations to provide *"probability-based constrained housing capacity estimates"*.

5.5 Paragraphs 5.1 to 5.6 briefly expand on the stated approach to 'small sites', confirming the intention to use 'trend-based' assumptions for capacity on all types of development on 'small sites' (conversion, change of use and new build). Inclusion of output from 'office-to-residential' change of use was anticipated to inform trends in activity.

5.6 Assessment of trends over a longer-term (12-year) time-period was specifically indicated within the information discussed with individual boroughs as an appropriate means of better reflecting fluctuating trends. Paragraph 5.1 of the February 2017 Methodology states, with respect of a 2004 to 2015 period that such a series would:

> *"essentially cover a number of market cycles, which should mean the trend-based assumptions provide a realistic average for over the plan period and fully take into account local constraints such e.g. heritage and the availability and viability of sites."*

5.7 Paragraphs 5.4 and 5.5 acknowledge the need to set out conclusions on past trends including and excluding the effects of policy measures to restrict accounting for 'windfall' development on garden land.

5.8 Particular local circumstances and housing pressures in London were signalled as potential reasons to continue to assess different policy approaches and additional scope for wider scenario testing – such as suburban intensification and measuring the potential impacts of introducing 'permission in principle'. Significantly, however, paragraph 5.5. concluded:

> *"The methodology and approach to scenario testing small sites 'windfall' assumptions will be developed in more detail at a later date and will be shared with boroughs for comment."*

5.9 It is a legitimate concern amongst the seven boroughs that further detail for scenario testing was not shared for comment in the manner indicated. Paragraph 6.4 of the November 2017 SHLAA confirms that the findings of one additional approach (above and beyond the 8-year and 12-year trends that individual boroughs were aware of) have been incorporated into estimates of capacity. Paragraph 6.4 summarises the rationale and necessity to assess a wider range of approaches as follows:

> *"In estimating housing capacity on small sites the GLA has considered three distinct approaches. This aims to comprehensively assess both* ***'historic'*** *and* ***'expected future trends'****, taking into account the potential impact of existing and proposed planning policy, market cycles and housing market trends. These three approaches are summarised below."*

5.10 The key departure in terms of Paragraph 6.4 and the 'Final' (February 2017) methodology shared with individual boroughs relates to judgement on whether the (longer) 12-year trend-based period originally proposed captures all relevant factors.

5.11 Consideration of 8-year and 12-year trends will be relevant to the scope of this assessment. However, the key finding of this review of the GLA 2017 SHLAA process is that prior to consultation on the draft London Plan 2017 individual boroughs were afforded limited insight into the methodology for 'Approach 3 – the modelled approach'.

5.12 The November 2017 SHLAA, at Paragraph 6.19, and as part of illustrating findings under a 'modelled approach', nevertheless explains that:

> *"In line with the SHLAA methodology, the GLA has examined the scope to increase current trends in housing completions on small sites as a result of policy changes proposed in the draft new London Plan, in particular Policy H2 – small housing developments."*

5.13 The second issue is therefore whether the presentation of one further set of findings amount to scenario testing in the manner potentially anticipated in the February 2017 Methodology. The timescales and limited range of options tested thus call into question the degree of influence on policy preparation and evaluating the comparative effects of alternative measures and options. The fact that the Minor Suggested Changes did not result in a decrease in the small site target despite reducing the scope of presumption reflects the disconnect between SHLAA and policy.

National Policy and Guidance for 'Windfall' Development

5.14 The background to the SHLAA process sets the context for a more detailed methodological assessment of the outputs provided by the published GLA SHLAA (November 2017). National policy and guidance provides an appropriate starting point for this analysis. For the avoidance of doubt, all references are to the version of the National Planning Policy Framework (NPPF) issued in 2012. Due to the timescales for preparation and submission it has been confirmed that the draft London Plan 2017 will be examined against this version of the NPPF[2]. References to national planning practice guidance (NPPG) correspond to paragraphs issued or updated between March 2014 and 24 July 2018. Recent changes from July 2018 ('the Revised NPPF' (2018) and updates to associated practice guidance) may provide further material considerations but are not directly relevant to conclusions on consistency with national policy.

5.15 The selected quotation marks provided in Paragraph 6.4 of the published SHLAA are unreferenced but can logically be viewed as being sourced from national policy and Paragraph 48 of the NPPF (2012):

> *"Local planning authorities may make an allowance for windfall sites in the five-year supply if they have compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. Any allowance should be realistic having regard to the Strategic Housing Land Availability Assessment,* ***historic windfall delivery*** *rates and* ***expected future trends****, and should not include residential gardens." (our emphasis)*

[2] This has been confirmed by both the Secretary of State and Planning Inspectorate during the course of this study's preparation. See, for example, London Plan Examination Document NLP/EX/04b (September 2018)

5.16 The full extract above provides a more comprehensive framework to identify key issues and priorities for analysis in the context of the SHLAA approach.

5.17 As a matter of cause and effect the relationship between draft Policy H2 and the outputs of the SHLAA cannot be overlooked. The 'small sites' targets contained within the draft London Plan 2017 are directly informed by the SHLAA outcomes – in-particular the findings under 'Approach 3 – 'modelled approach". At the same time, Paragraph 6.19 of the SHLAA suggests that such testing was specifically aimed at reflecting a policy intention to increase current trends for housing completions on 'small sites' and provides a direct reference to draft Policy H2. We go on to identify the closeness of fit between the 'modelled' assumptions and operating criteria for draft Policy H2. This is as opposed to the appearance of the policy approach being directly informed by the SHLAA, as is the approach recommended by national policy and practice guidance.

5.18 Given the potentially circular nature of this relationship it is helpful to set out three principles that can be evaluated separately to draw conclusions on the basis for pursuing alternative approaches and to illustrate their potential robustness compared to other alternatives:

- Are the methodological principles for a 'modelled approach' consistent with national policy?
- If a 'modelled approach' is to be assessed, how closely should this take account of factors affecting development and in particular the scale and characteristics of sites **consistently becoming available** in the past? [Capacity]
- To what extent should assessments of the **reliability** of sources of supply be factored into any 'modelled approach' anticipating future trends? [Delivery]

5.19 These points in relation to the specific GLA SHLAA methodology relate closely to the overall structure of this report. In isolation they are central to determining the appropriateness of the approach and in-particular whether there was an adequate process of engagement and consultation; and whether the concerns of the West London Alliance are justified due to the specific findings in the SHLAA.

5.20 It is therefore a specific purpose of our framework in this report to go beyond understanding the outputs of the 'small sites' modelling in terms of the capacity for development they necessitate and the related deliverability of targets. This should provide a starting point to understand the **wider impacts** of the proposed policy approach in terms of the consequences for sustainable development. Evaluating impacts in this way is also the basis for a comparison with existing and potential alternative policy options, which we identify the SHLAA has not assessed, despite assessing a significant uplift in delivery.

The Principles of a Modelled Approach

5.21 Although limited in length, Paragraph 48 of the NPPF nevertheless provides a single, consolidated starting-point to assess windfall development. In our opinion it can be interpreted in isolation, although caution must be noted given its explicit reference to *windfall* development in the context of *five-year supply*. Further advice is containing within National Planning Practice Guidance, specifically the section covering "Housing and economic land availability assessment".

5.22 The 'Stage 3: Windfall' section comprising this part of the NPPG repeats Paragraph 48 of the NPPF whilst also confirming the scope for the assessment of windfall contributing to later years of the plan period (years 6-15)[3]. In this respect the importance of unidentified supply is extended beyond the five-year period and illustrates a more logical connection to national planning policy for housing as a whole. Guidance specifically explains:

> *"Local planning authorities have the ability to identify broad locations in years 6-15, which could include a windfall allowance based on a geographical area (using the same criteria as set out in paragraph 48 of the National Planning Policy Framework)."* (our emphasis)

5.23 More broadly this follows the reference to 'broad locations' in later years of the plan period (years 6-15) identified at Paragraph 47 (bullet 3) on the NPPF. The assessment process for broad locations is considered in more detail in the relevant chapter of NPPG. Treatment of broad locations is essentially undistinguished from the assessment of individual sites. The key difference beyond year 6 of the plan period is the definition of *developable* sites used to determine the appropriateness of assumptions of the contribution to supply in future years. This entails conclusions regarding a *reasonable prospect* that capacity would be available and could be viably developed at the point envisaged.

5.24 Regarding the assessment of reasonable prospects for development the NPPG encourages a proactive approach, seeking a judgement on matters such as how availability may change over time[4] and the appropriateness of constraints based on existing policy designations that may change over time, depending on their consistency with the national policy[5]. This should not preclude an objective treatment of other physical constraints such as flood risk, impact on the built and natural environment and the amenity impacts experienced by occupiers and neighbouring areas.

[3] ID: 3-24-20140306
[4] ID: 3-020-20140306
[5] ID: 3-019-20140306

5.25 Guidance then goes on to specifically discuss the treatment of identified constraints prior to supporting conclusions on assessments and the outcomes for potential supply:

> *"Where constraints have been identified, the assessment should consider what action would be needed to remove them (along with when and how this could be undertaken and the likelihood of sites/broad locations being delivered). Actions might include the need for investment in new infrastructure, dealing with fragmented land ownership, environmental improvement, or a need to review development plan policy, which is currently constraining development."* (ID: 3-022-20140306)

5.26 In relation to broad locations in the context of assessments of windfall on unidentified sites the NPPG nonetheless stresses such judgements should be based on the same criteria in Paragraph 48 of the NPPF, therefore requiring regard to:

- Whether sites have consistently become available.
- The ability to continue to provide a reliable source of supply.
- Ensuring any allowance is realistic, having regard to the SHLAA, historic windfall delivery rates and expected future trends.

5.27 Having regard to the full range of national policy and guidance it is apparent that a '**modelled approach**' is not fundamentally incompatible with the process of ascertaining supply from previously unidentified sites. The reference to '**expected future trends**' in NPPF Paragraph 48 justifies a starting point for outcomes that to a greater or lesser extent may result in assumptions departing from past trends.

5.28 The reference to 'historic windfall delivery' and 'expected future trends' in-fact highlights the need for awareness of two separate methodological approaches: **projections** and **forecasts**.

5.29 The 'modelled' component of the small sites target represents a *forecast*: speculating on future levels of housing delivery based on a prediction of what will happen. The assumptions represent expectations of actual future events, but the degree of confidence may be limited and indicate a departure from past or current values. The degree of departure from trends influences the degree of confidence, particularly if the degree of policy change to drive past trends is limited. In the non-modelled component (i.e. 'windfall') the nature of underlying assumptions (such as those based on observation and existing trends) is that they will continue to apply and therefore the *projection* does not represent a prediction of future events.

5.30 Having set out these two distinctions and in-principle the acceptability of both in the context of national guidance the next two points consider more specifically how the nature of the forecast – or prediction – relied upon in the SHLAA to generate the 'small sites' target. It is apparent from national guidance that subsequent estimates of windfall supply should **have regard to the SHLAA's findings** to ensure their robustness. We interpret that this assessment of housing land supply should extend beyond simply the parameters of the 'small site' modelling assumptions.

Relationship with Factors Affecting Development

5.31 This section is essentially concerned with the *nature of the prediction(s)* made to inform a forecast-based approach which as highlighted is not inappropriate in principle. We consider that it more closely aligns with the specific basis of concerns outlined by the West London Alliance in its representations to the draft London Plan 2017.

5.32 Paragraph 6.22 of the SHLAA explains the nature of the outputs of the 'modelled approach' to estimate potential levels of development on small sites in the context of the overall objectives and scope of draft London Plan 2017 Policy H2:

> *"It is important to note that the application of Policy H2 is broader in scope than the modelling (which focuses on the existing stock of houses in particular spatial areas). The presumption in favour of development set out in Policy H2 would apply to small sites of 25 homes and less (but are less than 0.25 hectares in size) and covers infill development on vacant/under-utilised sites and the redevelopment/upward extension of flats and non-residential buildings. It would not apply to schemes over 25 homes, listed buildings, mixed use proposals within the CAZ or estate regeneration schemes."*

5.33 It is important to evaluate these comments in the context of national policy, and in-particular Paragraph 48 of the NPPF that stipulates (amongst other criteria) that any allowance for windfall should be "*realistic having regard to the Strategic Housing Land Availability Assessment*". This also relates to Paragraph 6.19 of the SHLAA in terms of illustrating to what extent the scope for development under Policy H2 has in-fact been assessed. This was previously indicated as forming part of the role for 'scenario testing' in the February 2017 methodology.

5.34 National Planning Practice Guidance confirms the broad role for land availability assessments to detail potential contribution towards future supply[6]. In terms of assessing potential, guidance more specifically highlights the need to consider existing and emerging plan policy, density, individual adjustments for site characteristics and physical constraints and the viability and achievability of development, which can be considered alongside the assessment of potential[7].

5.35 There is little or no scope for objection to Paragraph 1.2 of the GLA SHLAA in confirming that the assessment follows a probability-based approach (for 'large sites') that takes *"into account the range of economic, environmental and social policy objectives and the various planning, environmental and deliverability constraints which may influence the potential for identified sites to come forwards for housing or mixed-use development during this timescale"*.

5.36 However, on the basis of our review of the 'modelled' approach to estimate small site capacity we would conclude that the factors affecting development that have been taken into account are not sufficiently broad (i.e. to address the suitability, availability and achievability of development). Nor are they in accordance with the wider SHLAA methodology, national policy and guidance or standard practice to estimate windfall amounts.

5.37 Whilst national guidance recognises that patterns of development may change and opportunities to overcoming barriers to activity should be explored, the effect of such predictions and any resulting outputs should be measured as genuinely realistic. In this respect, assessment of a broader range of factors and variation on resulting findings, would be anticipated – in essence to also indicate a somewhat probabilistic estimate of housing potential on 'small sites'. This is necessary to demonstrate that any prediction is justified by the other considerations required in national guidance. The SHLAA methodology should therefore have considered barriers, quantified the impact of the refusals and then determined the impact of removing these barriers.

5.38 Paragraphs 6.28 – 6.38 of the SHLAA set out the implications for modelling of taking account of certain factors considered to affect development potential. Paragraph 6.26 also outlines the basis for 'Conversion Factors' used within the model, which have a significant impact on the net and gross yields derived from modelling. However, the role of 'Conversion Factors' and also adjustments for post-2001 new build dwellings and to update dwelling stock for development since the 2011 Census base-date fundamentally relate to the raw inputs of the calculation (see pg. 133 of this study for more information on Conversion Factors). They are based on limited information of factors actually affecting

[6] ID: 3-001-20140306
[7] ID: 3-017-20140306

development i.e. the spatial and planning characteristics of activity since 2011 or the reasons certain net yields from conversion are achieved whereas higher (or lower) totals are not. Adjustments to dwelling stock based on areas identified for estate regeneration are a measure to avoid double-counting rather than to evaluate or compare potential for development.

5.39 Adjustments for Listed Buildings and stock within Conservation Areas represent a more specific recognition of planning and heritage constraints affecting development potential (see para. 7.25 of this study). However, the commentary above demonstrates that significantly fewer potential factors are accounted for relative to the assessment process for 'large sites'.

5.40 In terms of the key locational criteria for the 'modelled approach' (i.e. existing residential homes within PTALs 3-6 or within 800m of a Tube station, rail station or town centre boundary), these are set out in draft Policy H2 (Part D(2)). These are further detailed within the GLA SHLAA, but not subject to sensitivity testing or presented alongside alternative scenarios and not further justified to any significant extent.

5.41 The key independent variable for modelling outlined by the SHLAA that does not correspond directly to draft Policy H2's provisions is an assumption that 1% of the existing stock of houses will increase in density in areas aligning with the locational criteria above. This is essentially termed a '**yield growth factor**'. Paragraph 6.24 regards this as a reasonable estimate for the level of additional housing that could be provided in view of the potential result of the proposed policy changes in the draft London Plan 2017.

5.42 This implies then that the methodology for the small sites assessment was designed in order to determine/estimate the impact of policy changes in the draft London Plan 2017, however it would appear to represent **an estimate of potential capacity only**. As a matter of principle there is no standalone justification for the 1% figure itself as a 'theoretical estimate'. The SHLAA presents no alternative based on modifying (to a greater or lesser extent) either the 1% estimate or other locational criteria.

5.43 As part of the SHLAA's key role in assessing the potential **capacity** for development it would be reasonable to anticipate an assessment of the relationship between the 1% assumption and how closely this relates to other factors affecting development and considered in the wider SHLAA. As a starting point, for example, the implications of development constraints and opportunities and rationale for applying variation to the '1%' assumption to account for geographic difference the range of datasets used in the assessment of 'large sites' (see SHLAA Table 2.2) could provide a useful framework.

5.44 Although it is acknowledged that the assessment stemming from Table 2.2 relates to specifically identified sites the datasets may also support robust conclusions in the context of the draft Policy H2 criteria used to define *broad areas* for windfall assessment. As well as signalling potential quantitative constraints (i.e. areas affected by Flood Risk) some of the datasets provide the starting point for a qualitative assessment. For example, taken together, features such as the SHLAA Character Map, presence of other land uses (e.g. designated employment land or open space) and identification of key infrastructure may provide an important indication and reflection of local character. As part of further engagement with individual boroughs on scenario testing such an approach could also be supplemented by local knowledge and additional information.

5.45 The nature of resulting changes to the 'small site' modelling assumptions could be two-fold in nature. The first would be a highly area-specific response and would be likely to result in adjustment to the 1% yield growth factor based on the presence of specific development constraints or land use considerations.

5.46 We would suggest a second approach may focus on the appropriateness of broad 800m buffers themselves and consider spatial alternatives such as a smaller radius. There is a logic for this, as expressed in representations from the constituent boroughs (and other Outer London boroughs) that is also multi-dimensional, though not divorced from recognising difference between individual areas and land use constraints.

5.47 From a 'mathematical' perspective the size of the buffers works in tandem with the total number of stations and qualifying town centres to determine how large-a-proportion of existing housing stock falls under Part D of draft Policy H2. This does not affect all boroughs equally. However, we would identify that the justification for adjusting geographic catchments should also consider factors that are fundamentally based on an understanding of place.

5.48 The starting point could broadly reflect measures such as representations of local character – for example does a wide 800m buffer accurately reflect the nature of Outer London Town Centres where these are predominantly linear in nature? It could also mean wider understanding of measures such as connectivity and the 'Good Growth' agenda – for example is an 800m buffer appropriate around Outer London stations where this accounts for large areas of PTALs 0-2 that do not convey a comprehensive understanding of travel options.

5.49 Nonetheless, taking account of these factors need not necessarily change the size of the 800m buffers themselves. Adjustments could equally be considered by, for example, removing certain areas from within the catchments from the modelling assumption – for example due to PTAL Rating 0-2 or areas defined as 'suburban' on the SHLAA Character Map. Assessing such alternatives would provide different views on the relationship with the capacity for development and also the potential impacts of draft Policy H2.

5.50 In seeking to assess capacity and overall development potential the SHLAA does not consider to what extent such other factors could and should also be applied to the 'theoretical' starting point.

5.51 These concerns are justified even treating the modelling as a proxy – **this element of the SHLAA has not fulfilled its wider purpose in understanding the finer-grained potential for development**. In terms of considering a forecast-based approach these factors therefore warrant further consideration in terms of whether the prediction applied, and basis for its justification, can robustly be expected to predict a departure from past trends.

Relationship with the Reliability of Supply

5.52 We have identified the risks associated with the 'modelled approach' as a forecast-based methodology taking relatively limited regard of the SHLAA in terms of basis for its prediction. This is inconsistent with one of the criteria of Paragraph 48 of the NPPF.

5.53 In assessing implications for the effectiveness of this approach in terms of informing the future **delivery** of housing it is necessary to consider in more detail the ability of the forecast to suggest reliable levels of future supply, also having regard to historic rates. This provides a further evaluation against the requirements of NPPF Paragraph 48 and can be outlined relatively briefly.

5.54 Noting that its outputs are in reality a proxy, Figure 6.9 of the 2017 SHLAA compares Approach 3 (partly incorporating 'modelled' outputs) against Approaches 1 and 2 (both entirely trend-based) and confirms the role of the forecast-based 'small sites' targets in anticipating a significant uplift in levels of development. With the exception of the '1%' assumption of existing dwellings affected by the policy all other criteria applied through modelling are informed by Policy H2 itself. It can reasonably be concluded that the practical effect of the SHLAA process for 'small sites' is to derive outputs from one set of assumptions to act as a 'tool' for monitoring in the future.

5.55 The SHLAA process does not itself associate or test the criteria relevant for modelling against historic patterns of delivery. It does, however, confirm that the modelling criteria only aim to capture some elements of potential schemes associated with the delivery of 'small sites'. It illustrates one version of how draft

Policy H2 is expected to operate in practice and derive outputs having assumed its effect on a given percentage of the existing dwelling stock. The SHLAA therefore provides little additional evidence to test the role of Policy H2 in terms of its wider impacts on the delivery of small sites.

5.56 Given these foundations, it is necessary to give consideration to the effectiveness of draft policy H2 in driving up delivery. A robust means of measuring its impact and effect on delivery is significant, as this is the basis upon which the Mayor has chosen to follow the 'modelled approach' to capacity rather than the accepted windfall approach.

5.57 The 'small sites' targets are both based on theoretical modelling and represent a relatively narrow gambit of options for development on 'small sites' as part of the *presumption in favour of small housing developments*. Given that the resulting outputs are such a significant departure from past trends it can reasonably be suggested that the SHLAA may seek to look in more detail at factors affecting delivery as part of substantiating these predictions and that they represent a realistic basis for adopting targets based on the 'modelled' approach.

5.58 At the purest level, one role for the SHLAA in directly generating the targets for 'small sites' should be to provide judgement and conclusions on the prospects for development against the specific criteria employed. However, given the overall scope of Policy H2 it is acknowledged that a wider understanding of delivery on 'small sites' would also be justified. This could include an assessment of other approaches to delivering small sites, and the relationship between different types of scheme and different geographies.

5.59 It is therefore significant that the *presumption in favour of small housing developments* supports schemes proposing up to 25 units. The benchmark for comparison with the 'modelled' component of the small sites target is only new build schemes between 1 and 10 units and schemes proposing residential conversion. The 'remaining windfall' component of the small sites target assumes the continuation of past trends on schemes proposing 11 or more units. As a minimum these levels would need to be maintained, and continue to reflect the trend-based component, to achieve the targets for small sites. In many cases schemes between 11 and 25 units represent more challenging conditions (e.g. due to policy requirements seeking contributions towards affordable housing). Also, not all of the trends in development on schemes proposing between 11 and 25 units correspond with Part D of draft Policy H2 e.g. schemes for Change of Use. Because of this relationship the reliability of targets informed by the GLA SHLAA 2017 should also assess how the proposed approach in draft Policy H2 would help to maintain or increase delivery of schemes up to 25 units.

5.60 Unless the targets for 'small sites' are in themselves justified (in terms of being realistic and their relationship with past trends) it is difficult to adjudge that the impacts of Policy H2 itself are properly understood or whether a focus on other interventions may potentially be more realistic and effective.

5.61 In setting out the 'modelled approach' one weakness of the SHLAA is that it does not seek to explore the relationship with other delivery models, types of scheme and sources of supply. Given the significance of the departure from past trends we would suggest that to be regarded as reliable the key features of the forecast require a more detailed assessment in terms of their implications for timescales, characteristics of development and likelihood of being delivered in accordance with draft Policy H2's indicators (i.e. in terms of geography and scale). This could only reasonably be confirmed by a relatively fine-grained comparison with past trends to fully support the justification for individual assumptions.

5.62 The list of factors identified below is not necessarily exhaustive, but forms a framework of topics identified by national guidance that will be the subject of further investigation in this study:

- Development viability on 'small sites' including the impact of planning obligations.
- The availability of sites and capacity of the industry.
- The impact of existing development plan policies and standards.
- Trends in the delivery of schemes incorporating residential conversions.
- Features of the housing market including changing demand (i.e. housing need) for products and growth in the private rented sector.

5.63 One specific query which emerges from the need to consider these factors as well as looking more closely at the relationship between the 'modelled approach' and past trends is whether the SHLAA reaches appropriate conclusions on the deliverability of increasing housing provision through the sub-division of existing dwellings, whilst disregarding sub-divisions of flats as a reliable source of supply. There is no scenario testing within the SHLAA to indicate the geographic implications (in terms of the fine-grained spatial distribution of 'modelled' targets) of applying alternative assumptions.

5.64 It should also be noted that although partly representing short-term indications for capacity on 'small sites' the draft London Plan 2017's housing targets cover a ten-year period. This may indicate a need to take account of economic cycles and assess the impact of policy options over the longer-term. It may be necessary to determine whether a ten-year period is a realistic timeframe over which to estimate delivery of the 'small sites' target or whether a 15-year period (more closely aligning with national policy in Paragraph 47 of the NPPF) would be more appropriate. The GLA SHLAA makes no mention of the achievability of targets

over the ten-year period. Planning practice guidance confirms such views should, for example, take account of any history of unimplemented planning permissions as an indicator of the availability and capability of development on relevant sites[8].

5.65 In terms of assessing viability considerations and their potential impact on the delivery of targets for 'small sites' it should be stressed that this project does not seek to undertake viability assessment of relevant development types. Within the overall diversity of examples of 'small sites' and the context for development in West London it is inevitable that some schemes would show a positive development return and others not. In any event the viability implications of draft Policy H2 will not be fully known without further policy-making at borough level; viability outcomes will be highly dependent on factors such as the approach to planning obligations and any contributions towards affordable housing from 'small sites'. Local Plan policies will also be subject to viability testing to ensure any requirements, such as affordable housing, do not affect the delivery of houses from small sites and small housing developments.

5.66 What we would highlight is that factors affecting viability can be outlined in a general sense and should be subject to more detailed understanding in relevant local contexts – such as variation in development costs and values. This is particularly significant given the step-change in delivery anticipated by draft Policy H2. The typical means of addressing and differentiating potential effects in terms of the likelihood and phasing of development would be through a 'discounting' process following identification of total 'unconstrained' development capacity. Within the GLA SHLAA 2017 there does not appear to be any such qualification of the 'modelled' small sites outputs.

5.67 Finally, in terms of the wider potential relationship between draft Policy H2 and the reliability of delivery estimates it may also be necessary to consider the impact of increasing rates of activity on 'small sites' in areas aligning with the locational criteria and the availability and delivery of large sites.

Evaluating the Wider Impacts of draft Policy H2

5.68 Assessing the proposed approach to 'small sites' in the draft London Plan 2017, including the dual challenges of the capacity for development these assumptions are founded upon and the step-change in delivery required, makes it self-evident that wider impacts of the proposed approach also need to be recognised. Many of the impacts of supporting increased rates of development on small sites will be specific to individual areas. It is not always easy to differentiate these from assessment of what we have already termed 'factor affecting development' –

[8] 3-020-20140306

such as the relationship with existing land uses and character to determine suitability and achievability.

5.69 Part B of draft Policy H2 is nonetheless predicated on the objective that local character can evolve over time as part of meeting housing need and accommodating appropriate growth. It is not the purpose of this assessment to disregard this objective or conclude that it cannot form part of sustainable patterns of development. For example, some degree of conflict with existing policy and land use patterns is acknowledged as being inevitable. However, the scale of targets and therefore potential change is significant in magnitude. Some factors therefore transcend their individual relationship with the modelling inputs or delivery process.

5.70 This moves them from the scope of understanding whether 'small sites' targets can inform reliable estimates of supply to determining whether wider impacts can be fully assessed. This takes account of the potential cumulative impact of the proposed approach under draft Policy H2 and requires a wider understanding in terms of potential implications for sustainability and their evaluation against alternatives.

5.71 Such wider impacts, which fall partly within the scope of this assessment and its conclusions but are likely to require further analysis include:

- The implications for managing the cumulative impact of supporting substantially higher levels of development on small sites in terms of planning and providing for development requirements such as education, transport and utilities;
- Assessing the longer-term relationship between increased rates of development on small sites and meeting housing need, including:
    - Meeting the requirement for affordable housing;
    - Meeting the needs of different groups in terms of the type, tenure and size of housing (including within the private rented sector); and
    - Managing the quality of housing stock and improving development standards
- The compatibility of the *presumption in favour of small housing developments* with the formulation and delivery of other policy options including: site-specific or area-specific intervention; large-scale regeneration; site identification and land assembly; and the delivery of large sites.

5.72 Although falling outside the remit and expertise of this study, it is also worth noting the potential impact that draft Policy H2 may have upon cumulative flood risk in the boroughs. This appears not to have been properly assessed in the Integrated Impact Assessment (IIA) accompanying this plan, as the IIA states that objective 19 'To manage the risk of flooding from all sources and improve the resilience of people and property to flooding' is not applicable to draft Policy H2. The WLA has expressed concern that the risk of flooding may increase as a result of increased building on small sites; sites which are not sequentially tested in terms of flood risk and therefore do not allow the LPA to plan for an appropriate level of mitigation.

6. Understanding the GLA SHLAA 2017 Findings

This Chapter represents the second component in progressing the methodology for the Critique by providing a more detailed analysis of the SHLAA's assumptions and findings. A particular focus is to evaluate the different approaches considered by the GLA and the extent to which these separately depart from past trends in development. These outcomes are also compared with the approach in earlier iterations of the SHLAA and the approach used to assess capacity and potential timescales for development on 'large sites'. Given the focus on 'Approach 3 – the modelled approach' specific attention is paid to how individual assumptions and inputs to derive the 'modelled' components of capacity appear to have been derived and applied. The chapter initially considers the robustness of these assumptions, their relationship with the context in West London and potential implications for the reliability of future supply and wider impacts of the proposed approach.

The Definition of 'Small Sites'

6.1 The definition adopted as the starting point for analysis in this project considers all schemes with a total site area of **0.25ha or less** as providing capacity on 'small sites'. This is consistent with the long-standing methodology for site and capacity assessment adopted across various iterations of the GLA London SHLAA. Draft Policy H2 (and supporting text) also refers to this baseline definition for 'small sites'.

6.2 It is acknowledged that analysis will need to reflect that the intended operation of Policy H2 and the evidence base used to derive the draft London Plan's small sites target both operate sub-classifications of activity on small sites. These include distinguishing 'new build' schemes proposing 10 homes or more than 10 homes in terms of whether they are captured respectively by the 'modelled' or 'remaining windfall' elements of the small sites target.

6.3 The most significant sub-classification likely to act as a determinant of future trends in small site activity is the operation of a threshold for proposals seeking between 1 and 25-units only falling under the *presumption in favour of small housing developments* (subject to other qualifying criteria). The evidence base for the small sites target is, however, prepared in the context of the broader 0.25ha definition. Paragraph 4.2.4 of the draft London Plan 2017 (as amended by Minor Suggested Changes) recognises that as well as capturing the vast majority of schemes proposing up to 25 units housing capacity on sites below the threshold will also include schemes providing more than 25-units. These examples would

typically be captured as part of the assumption for 'remaining windfall' and although not covered by the *presumption in favour of small housing developments* therefore also remain part of the 'small sites' targets.

6.4 Exploring data within these sub-classifications is therefore relevant to assessing the robustness of the approach in the draft London Plan 2017. This could, for example, indicate the proportion of individual schemes falling within the relevant sub-categories. It may also involve noting that the overall pattern and capacity for development on individual sites can lead to them transcending distinct groups (i.e. cumulative or revised proposals lead to proposals exceeding 10-units or 25-units).

The SHLAA 'Small Sites' Methodology

6.5 We have assessed the methodology and available data that the GLA SHLAA 2017 uses to benchmark trend-based activity on small sites and subsequent rationale to forecast future levels of activity as part of the presumption in favour of small housing developments. Whilst it is the robustness of this 'modelled approach' that we proceed to assess in detail it is useful to illustrate the methodology and findings from traditional 'trend-based' analysis undertaken by the GLA SHLAA 2017. This is helpful as it allows comparison with previous evidence (including the GLA SHLAA 2013), different time-periods and an understanding of the different types of development on small sites.

6.6 The GLA considered three approaches towards calculating small sites targets in the 2017 SHLAA:

- Approach 1: 8-year post-recession trends
- Approach 2: Longer term 12-year trends
- Approach 3: Modelled approach

6.7 The GLA have used 'Approach 3 'to calculate the small sites targets in the draft London Plan 2017.

6.8 Approaches 1 and 2 represent a projection of all past-trend windfall activity within relevant time periods. Both provide separate recognition of development identified as taking place on 'garden land' although the level of adjustment to reflect these elements differs between the two approaches. The removal of all housing completions arising from office to residential Permitted Development rights is common to both Approaches 1 and 2 and nor does such capacity form any part of the outputs under Approach 3. We go on to consider the implications for this.

6.9 Approach 3 introduces a modelled approach, which assumes increases on the current trends in housing completions on small sites as a result of policy changes in the proposed draft London Plan 2017. Policy H2 aims to significantly increase

housing delivery on small sites through supporting increasing densities of existing residential areas through residential conversions, extensions, new build/ infill development and redevelopment.

6.10 The modelled approach examines the scope in each borough to increase small site developments and net additional housing supply within existing residential areas through:

- conversions (subdivision) of houses to flats; and
- new build infill development of 10 homes and fewer.

6.11 Policy H2 promotes the above forms of development in areas which benefit from PTALs 3-6 or are within 800m of a tube station, rail station or town centre boundary; the modelling assumes that 1% of the existing stock of houses will increase in density in these areas. Growth assumptions in the model are applied to detached and semi-detached ('non-terraced') and terraced houses as recorded in the 2011 census.

6.12 The assumption is not applied to flats, including any houses converted into flats, maisonettes or apartments. In conservation areas the 1% assumption has been reduced to 0.25%, reflecting the fact that residential intensification may be more limited in these areas, but that increases in existing density levels are still expected through residential conversions. Listed Buildings, new build houses and estate regeneration schemes have been excluded from the modelling. Development upon 'garden land' associated with existing dwellings (e.g. infill development within a residential curtilage) is acknowledged as one of the development types anticipated and facilitated by the proposed approach in draft Policy H2, though specific expectations of this development type are not quantified.

6.13 The findings from the modelling are then added to the remaining windfall trends in housing completions on other types of small sites, as these are not covered in the modelling (notwithstanding potential concerns over 'double-counting'). The remaining windfall trend capacity estimate is based on annual trends in net housing completions between 2008/9 (FY2008) and 2015/16 (FY2015) and includes:

- change of uses (with housing completions from office to residential permitted development removed);
- new build schemes where the proposed number of new homes is more than 10.

6.14 New build development (of 10 homes or fewer), residential conversions and infill development within a residential curtilage have been removed from the remaining windfall to avoid double counting these typologies.

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6.15 The table below sets out the overall (annualised) housing targets for each of the boroughs; the 2013 targets are from the GLA 2013 SHLAA, which informed the 2015 London Plan. The 2017 targets have been taken from the draft London Plan 2017, as informed by the GLA 2017 SHLAA.

WLB	Small Sites Target 2013			Small Sites Target 2017					Increase 2013-2017	
	Overall target	Small sites	Small sites % of total	Overall Target	Small Sites	'Modelled'	'Trend-Based' Windfall	Small site % of total	Overall Target	Small Sites
Barnet	2349	327	13.9%	3134	1204	1090	114	38.4%	33.4%	268.2%
Brent	1525	263	17.2%	2915	1023	840	183	35.1%	91.1%	289%
Ealing	1297	301	23.2%	2807	1074	920	154	38.3%	116.4%	256.8%
Harrow	593	251	42.3%	1392	965	830	135	69.3%	134.7%	284.5%
Hillingdon	559	174	31.1%	1553	765	670	95	49.3%	177.8%	339.7%
Hounslow	822	161	19.6%	2182	680	570	110	31.2%	165.5%	322.4%
WLA total	7145	1477	20.7%	13983	5711			40.8%	95.7%	286.7%

Table 6.1 Annualised Small Site Housing Targets for the WLA Boroughs

6.16 The 2017 small sites targets shown have been split into 'Modelled' and 'Windfall', which together make up the draft London Plan 2017 small site target. The Modelled figure is an estimate of the potential increased housing delivery within existing residential areas as a result of policy changes in the draft London Plan 2017. The Windfall element uses post-recession trends (2008-2015) in housing completions including Change of Use and New Build (10+ homes schemes) and excludes change under 'office to residential' rights for Permitted Development, residential conversions and infill development within a residential curtilage.

6.17 The table shows an increase in the overall target in all of the West London Alliance boroughs between the 2013 and 2017 London Plans, with particularly high increases in Harrow (134.7%), Hillingdon (177.8%) and Hounslow (165.5%). Small sites targets have also increased in the WLA boroughs. The highest increases are seen in Hillingdon and Hounslow of 339.7% and 322.4% respectively.

6.18 A key concern for the West London Boroughs is that the increased housing supply benchmarks in the draft London Plan 2017 are a function of increased estimates of capacity on large sites and small sites combined. This is illustrated by the table below:

WLB	Large Sites Benchmark – 2017 SHLAA			Small Sites Benchmark – 2017 SHLAA			
	Increase in Annualised Requirement	% Increase from FALP 2013	Increase – as a % of total change in benchmark	Increase in Annualised Requirement	% Increase from FALP 2013	Increase – as a % of total change in benchmark	Overall Change in Benchmark
Barnet	39	2.1%	5.0%	877	268.2%	111.7%	785
Brent	794	76.0%	57.1%	760	289.0%	54.7%	1390
Ealing	745	83.0%	49.3%	773	256.8%	51.2%	1510
Harrow	101	31.6%	12.6%	714	284.5%	89.4%	799
Hillingdon	403	104.7%	40.5%	591	339.7%	59.5%	994
Hounslow	841	127.2%	61.8%	519	322.4%	38.2%	1360

Table 6.2 Increases in Annualised Housing Targets from FALP 2013

**Figures may not sum to 100% due to changes in the pipeline of non-self-contained accommodation and treatment of vacant dwellings returning to use*

6.19 The position can be contrasted with the series of comparator Outer London boroughs set out below. The absolute increase in targets for 'small sites' are relatively similar, given the 'modelled' approach to generating these targets affects Outer London boroughs relatively equally, albeit in most cases the starting point provided by FALP 2013 benchmarks is higher in West London, reducing the percentage change. What is more telling is that the absolute and percentage increase in benchmarks for 'large' sites tends to be higher amongst the West London Boroughs. This reduces the overall proportion of the increase in targets represented by small sites but does not escape the overall challenge for delivery. Total benchmarks are almost all higher in the West London Boroughs than the comparator examples – within the constituent boroughs the overall benchmark exceeds 1,500 homes per annum in all except LB Harrow (1,392). Within the comparator boroughs only LB Croydon and LB Enfield comprise benchmarks over 1,500 per annum, principally due to the greater estimate of capacity on large sites.

6.20 It is important to note that the figures do not compare exactly like for like for all of the boroughs. The 2013 figures for LBs Ealing and Brent are based on the full borough, however the 2017 figures are based on the LPA area (excluding the OPDC).

Comparators	Large Sites Benchmark – 2017 SHLAA			Small Sites Benchmark – 2017 SHLAA			Total Benchmark	
	Increase in Annualised Requirement	% Increase from FALP 2013	Increase – as a % of total change in benchmark	Increase in Annualised Requirement	% Increase from FALP 2013	Increase – as a % of total change in benchmark	Overall Change in Benchmark (2013-2017)	Overall Benchmark
Bexley	47	14.2%	5.9%	756	695.8%	94.7%	+799	1245
Bromley	103	35.5%	13.1%	677	192.2%	86.4%	+783	1424
Croydon	615	74.6%	40.6%	919	155.1%	60.7%	+1514	2949
Enfield	382	73.2%	35.4%	724	280.0%	67.2%	+1078	1876
Merton	455	227.8%	49.6%	460	217.7%	50.1%	+917	1328
Richmond	37	26.8%	7.5%	459	261.5%	92.5%	+496	811
Sutton	26	14.5%	4.4%	572	344.3%	99.3%	+576	939

Table 6.3 Increases in Annualised Housing Targets from FALP 2013 in Comparator Outer London Boroughs

**Figures may not sum to 100% due to changes in the pipeline of non self-contained accommodation and treatment of vacant dwellings returning to use*

6.21 This continues a trend from earlier versions of the London Plan in terms of the successful record of site identification and allocation of large scale opportunities in West London. This combination of the growth in benchmarks for 'small sites' and 'large sites' draws into sharper focus the challenge of 'delivery' on London Plan targets as a whole as well as the calculation of a specific target for small sites.

The Background to 'Trend-Based' Windfall Assumptions

6.22 The 2013 small sites targets largely follow historic windfall delivery between 2004-2012 and includes supply sources from change of use, new build and conversion.

6.23 It is relevant to identify a number of the GLA 2013 SHLAA's conclusions on the findings following analysis of past trends and the justification for the approach. An 8-year period 2004/5 to 2011/12 was considered to represent a full market cycle illustrating a realistic average for the plan period.

6.24 Use of an 8-year period represented an increase of 4 years beyond a 2004/05-2007/08 period initially assessed by the 2009 SHLAA. This was, however, considered to reflect only "boom years" prior to the recession and prior to completion the 2009 SHLAA was amended to use data for an adjusted 2000-2007 period. The resulting 10-year small sites target within the 2009 SHLAA was for 73,572 dwellings; the initial 2009 SHLAA estimates (based on a four-year period) gave a 10-year total of 99,819 dwellings. Both figures are below the 2015-2025 total of 106,476 dwellings given by the GLA SHLAA 2013.

6.25 The 2009 SHLAA represents an older time series for data and is generally less helpful in comparing current patterns of activity on small sites. In-particular the inclusion of pre-2004 data precedes the more reliable information provided by the London Development Database. This allowed only 'approvals' data to be assessed for the years 2000-2003. As well as extending the period around the pre-recession "boom" years this dataset may itself contribute to the lower annual trends in activity captured by the extended period.

6.26 This relates to the 'approval to completion rate' applied to 2000-2003 data to generate annualised completion totals. It is, however, important to future work in this report to note that based on past trends an 'approval to completion rate' of **47%** was adopted. This will have some correlation with trends in unimplemented consent (i.e. lapsed, superseded) and timescales for development. This proxy is important; it means that a higher figure for the 2000-2007 trend period would arise whether either the number of approvals was greater or the approval to completion rate was in-fact higher than suggested.

6.27 The GLA SHLAA 2013 provides a more relevant position to compare baseline trends identified in the GLA SHLAA 2017 and represents a similar application of data. The higher figures were projected forward as a robust estimate notwithstanding the concerns of some boroughs and acknowledgement that trends in new build, change of use and conversion activity on small sites remained below pre-recession levels (albeit with small upturns in the two former categories in 2011/12). Trends in conversions were noted as continuing to fall.

6.28 Justification for the higher trend-based assumption in the 2013 SHLAA comprises several grounds. Firstly, the 2013 and 2009 SHLAAs both adopted adjustments to remove completions on 'garden land' from past trends (at a rate of 90% of past totals). This reflects national policy from the NPPF 2012 and prior to the provisions of the London Plan to pre-empt this change and facilitate individual boroughs looking to introduce policies to manage this pattern of development. The proxy used to capture this adjustment in the 2009 SHLAA was *"'Possible' garden land completions are replacement schemes resulting in a net gain of units and loss of garden land and 'core' garden land completions are on sites which would be clearly defined as garden land"* (GLA SHLAA 2009, Para 3.53).

6.29 The 2013 SHLAA indicates an amended proxy was applied *"using the database to identify units completed in the selected financial years where the existing use is C3 but no existing units are lost, plus the development type is new build"* (GLA SHLAA 2013, Para 3.56). This technical adjustment to the 2013 SHLAA was considered to more closely reflect those instances where garden land was actually lost. The difference means that 4,418 units were removed from the 10-year trend in the 2013 SHLAA compared to 10,740 units in the 2009 SHLAA, both reductions reflecting the adjustment for garden land. The 2013 SHLAA explains this partly due to the improvements to the technical adjustment but also because the combined impact of policy chances and the recession were taken as reducing patterns of garden land development – *"the less garden land that is being built on, the less the adjustment for garden land development will be"* (GLA SHLAA 2013, Paragraph 3.60).

6.30 The trend period considered by the GLA SHLAA 2013 pre-dates the introduction of Permitted Development rights for 'office-to-residential' conversion so this development activity does not form part of projected small site capacity for the ten-year period. In respect of small sites, the 2013 SHLAA adopts a neutral position; recognising that in many cases conversion might yield fewer units than redevelopment of sites otherwise supported by London Plan policy (and reflected in the SHLAA's assessment of capacity on large sites). Conversely, the published GLA SHLAA 2013 recognised *"many small offices are also being converted to residential which could suggest an underestimation of capacity in the small sites trends reported in this SHLAA"* (Paragraph 2.86). This is in effect a recognition of office-to-residential permitted development and emerging patterns of uptake significantly increasing the likelihood of the ten-year trend-based benchmarks established by the GLA SHLAA 2013 being achieved in practice – given they were derived using data pre-dating these rights.

6.31 Where boroughs sought to indicate that trends demonstrated by a 2004-2012 period may overestimate potential levels of small site development this position was refuted by the GLA. It was not possible to find sufficient evidence that policies introduced to restrict development towards the latter half of the trend period had significantly reduced the number of units coming forward. The GLA further offset whether the impact of such policies would reduce future trends with recognition that:

> *"there are also arguments to assume that the 2004-12 trend will in fact under estimate future delivery, in particular due to; the tendency for densities to increase over time, the office to residential permitted development rights and the proposed retail to residential permitted development rights, which are all likely to lead to an increase in housing numbers from small sites."* (GLA SHLAA 2013, Para 2.71)

6.32 It is also useful to note that the 2013 SHLAA includes a limited degree of London-wide analysis to illustrate past trends in activity on small sites and therefore the relative contribution of the 'small sites' figure to the overall 10-year target per borough and for geographical subdivisions of the city as a whole. This demonstrates that greatest concentration of activity in Inner London boroughs towards the east and centre of the city. Only one outer London borough (Croydon) was projected as making a more significant contribution towards the small sites total.

6.33 The figure provided as the 10-year target for small sites development is not benchmarked against other potential indicators such as the stock of existing property (either residential or non-residential) or land-use considerations (e.g. distribution of town centres, public transport or development constraints). The 2013 SHLAA recognises that the relative distribution of trends in small sites will be a function of both existing market trends and the physical capacity for development, and that these factors do not affect each borough equally:

> *"The boroughs that are assumed to have the least small site capacity are the LLDC (358), City of London (644) and Barking and Dagenham (967). For Barking and Dagenham in particular, this low figure is not likely to be due to a lack of physical capacity (unlike the City for example), instead it is likely to be due to the fact that the market has not previously brought forward small site development and the figures assume a continuation of this trend."* (GLA SHLAA 2013, para 3.53)

6.34 The same combination of factors is also relevant to assessing the contribution of the small sites target as a proportion of the overall supply indicated by the 2013 SHLAA. This was noted as ranging between 10% and 50% of the total figure and reflects *"a combination of the availability of larger sites in boroughs and also the buoyancy of the sub markets in each borough"* (GLA SHLAA 2013, para 3.54). Bromley and Islington are given as examples where the small sites component comprises over 50% of the total target but the absolute contribution from small sites over the ten-year period are very different (3,521 and 6,624 respectively). In the case of Bromley, for example, the high representation of small sites is very much driven by the lack of supply identified on larger sites; the factors that may lead to additional capacity from large site sources in the future may be very different to those affecting the buoyancy of activity on small sites. This contrasts with examples such as Barking and Dagenham where, whilst the small sites target (967) was also low in absolute terms, it was far lower (10%) as a proportion of the overall total due to the greater volume of capacity identified on large sites.

6.35 Albeit in a broad sense the 2013 SHLAA recognises that targets for small sites cannot be assessed without considering the distribution of factors affecting past trends and the relationship with targets for large sites; and that these two elements are separate but may not be unrelated to one another.

Performance Against London Plan Targets

6.36 We have also taken account of housing monitoring indicators within the constituent West London Boroughs, having regard to the GLA's Authority Monitoring Report. This requires a measurement of performance against the respective housing supply benchmarks in the version of the London Plan covering relevant years (2013/14 and 2014/15 – London Plan 2011; 2015/16 – Further Alterations to the London Plan 2015/16). This requires some understanding of the differences between targets in each plan and the demands placed on anticipated supply.

6.37 Table 3.7 of the July 2017 GLA Authority Monitoring Report (replicated below) confirms strong performance by the constituent boroughs against cumulative benchmarks over the period:

	Performance vs Benchmark 2013 - 2016		
	Total Net Completions	Cumulative Benchmark	
	2013/14 - 2015/16	2013/14 - 2015/16	2013 – 2016
LB Barnet	3901	6953	56.1%
LB Brent	4403	4115	107.0%
LB Ealing	3395	3484	97.4%
LB Harrow	1677	1536	109.2%
LB Hillingdon	2550	1543	165.3%
LB Hounslow	2643	2114	125.0%

Table 6.4 Measurements of performance against respective housing supply benchmarks for each of the WLA boroughs (copied from GLA London Plan Monitoring Report (July 2017)

6.38 The relevant benchmarks are taken from Annex 4 of each respective version of the London Plan, providing a disaggregation of supply requirements. These only give an indication of conventional and non-conventional supply but cite the evidence of the relevant GLA SHLAA informing estimates of capacity, so it is possible to disaggregate trends in activity on small sites as a component of future requirements. This also allows an understanding of how the large and small site components vary between subsequent iterations of the SHLAA (notwithstanding any changes in methodology).

6.39 GLA Authority Monitoring Reports use the overall requirement and disaggregated benchmarks for conventional supply as measures for Key Performance Indicators. Therefore, they do not report separately on delivery from 'large sites' and 'small sites' on a borough-by-borough basis.

6.40 The GLA has issued 'Housing Research Note 2018/01' – 'The profile of London's new homes in 2016/17: Analysis of the London Development Database'. This Report is helpful as it shows trends in completions broken down by 'Inner' and 'Outer' London geographies by small and large sites over a longer period (from 2012/13) albeit not disaggregated by borough. This highlights an overall picture of the delivery of large sites in Outer London showing a significant increase between 2012/13 and 2014/15; in subsequent years delivery has remained steady at c.10,500 completions per annum but with little further increase. Since 2014/15 the increase in the overall volume of completions has been driven by year-on-year growth in activity on small sites.

Site size by location	2012/13	2013/14	2014/15	2015/16	2016/17
Large: Prime Inner	1,197	2,101	1,822	1,644	1,686
Large: Inner	7,533	6,669	7,796	8,767	10,995
Large: Outer	6,805	9,274	10,207	10,513	10,444
Small: Prime Inner	1,560	1,989	2,197	2,098	2,875
Small: Inner	3,245	3,095	3,991	4,384	5,635
Small: Outer	4,135	3,492	4,638	7,381	7,929

Table 6.5 Completions on large and small sites in Inner and Outer London boroughs (Source: Housing Research Note 2018/01' – 'The profile of London's new homes in 2016/17: Analysis of the London Development Database')

6.41 However, in relation to the growth in activity on small sites these *"have been entirely driven by changes of use and (less importantly) conversions. In Inner London, increased numbers of new homes have been driven more equally from new build and changes of use"* (Paragraph 4.5).

6.42 The reasons for this observation do not, however, affect all of Outer London equally. There is also a difference between the nature of completions that have been recorded and anticipated trends in activity on 'small sites' – i.e. the development types included in measures of windfall and over what time series recent activity is compared. This particularly relates to trends such as office-to-residential conversions under Permitted Development. As a result, understanding activity against 'benchmarks' for small and large sites is helpful in comparing the different approaches considered in the GLA SHLAA 2017 and previous iterations.

6.43 The essential finding for West London is that observed levels of activity on small sites have had a positive effect on achieving housing supply benchmarks for this component. These have typically been exceeded (sometimes by several orders of magnitude) in the years 2013/14 to 2015/16. This is a function of trends in development type and the time-period for assessment used to inform the benchmarks.

6.44 Using 'Approach 1' (8-year trend) from the GLA SHLAA 2017 there is very little change in the benchmark for small sites as a component of housing using traditional 'windfall' projections. This was not the case comparing differences between the benchmarks in the London Plan 2011 and Further Alterations to the London Plan (2013) where an overall increase in small site activity had been picked up as part of trends between 2004 and 2012. This comparison is set out in the table below. However, as we illustrate these trends have subsequently been stable over 8-year and 12-year periods to 2015/16.

	London Plan 2011 Further Alterations London Plan 2013 – absolute change	London Plan 2011 Further Alterations London Plan 2013 – %	Further Alterations London Plan 2013 – GLA SHLAA 2017 (Approach 1) - absolute	Further Alterations London Plan 2013 – draft London Plan 2017 (Approach 1) - %
LB Barnet	131	67%	-22	-6.73%
LB Brent	124	89%	-5	-1.90%
LB Ealing	131	77%	2	0.66%
LB Harrow	78	45%	-30	-11.95%
LB Hillingdon	104	149%	2	1.15%
LB Hounslow	73	83%	20	12.42%
WLA Total	641		-33	

Table 6.6 Increases in small site activity between 2004 and 2012 as picked up by the London Plan 2011 and 2013

6.45 The annual performance against benchmarks for capacity on 'small sites' is shown in the following table. 'Small sites' as a component of the overall benchmark has been identified from the evidence base for the respective London Plan 2011 and FALP 2013 figure. For net completions on small sites we have applied the totals (including Change of Use under Permitted Development and 'garden land' schemes) provided in the 'housing target summaries' provided to individual boroughs during preparation of the GLA SHLAA 2017 (see over).

	Annual Small Site Completions			London Plan Benchmark – 'Small Sites' component			Annual Performance - % of benchmark		
	2013/14	2014/15	2015/16	2013/14	2014/15	2015/16	2013/14	2014/15	2015/16
LB Barnet	345	319	295	196	196	327	176.0%	162.8%	90.2%
LB Brent	182	237	375	139	139	263	130.9%	170.5%	142.6%
LB Ealing	222	284	439	170	170	301	130.6%	167.1%	145.8%
LB Harrow	226	270	394	173	173	251	130.6%	156.1%	157.0%
LB Hillingdon	149	166	278	70	70	174	212.9%	237.1%	159.8%
LB Hounslow	307	223	247	88	88	161	348.9%	253.4%	153.4%

Table 6.7 Annual performance against benchmarks for capacity on small sites in each of the WLA London boroughs

6.46 Where supply from 'small sites' has exceeded benchmarks, this has therefore typically comprised recent patterns of development that are not included in future trend-based assessments of supply on small sites – namely Change of Use under Permitted Development and to a lesser extent development on 'garden land' that is also excluded under a trend-based approach.

6.47 Essentially, with the exception of patterns of activity under Permitted Development Rights (not relevant for the purpose of proposals in draft Policy H2) the 'small sites' component of the housing supply benchmark in the FALP 2013 remains a stable and relatively accurate measure of current trends.

6.48 Notwithstanding the strong performance in West London against the overall London Plan housing supply benchmarks it is therefore the case that delivery against the component of capacity estimated on large sites has been more mixed over the period 2013-2016. However, this needs to take account of the fact that the estimated capacity on large sites in the constituent boroughs has increased significantly since the London Plan 2011. These increased estimates of capacity, contributing to the majority of the housing supply benchmarks, were partly reflected in the Further Alterations to the London Plan (2013). This is further and more substantially reflected as part of the findings of the GLA SHLAA 2017 (with reasons summarised in Paragraphs 9.10 to 9.21).

	LP2011 vs FALP2013 – absolute change	LP2011 vs FALP2013 - %	FALP 2013 vs GLA SHLAA 2017 (Large Sites) – absolute change	FALP 2013 vs draft London Plan (Large Sites) - %
LB Barnet	+4	0.2%	+39	2.13%
LB Brent	+208	24.9%	+794	76.00%
LB Ealing	+224	33.2%	+745	83.04%
LB Harrow	+144	81.8%	+101	31.48%
LB Hillingdon	+40	11.6%	+403	104.52%
LB Hounslow	+296	81.1%	+841	127.20%
WLA Total	+916		+2923	

Table 6.8 Increasing estimates of capacity on large sites from the London Plan 2011 to the draft London Plan

6.49 Trends in delivery against these increased benchmarks have been uneven, to the extent that in some cases performance against the overall target is offset only because of the higher rates of development on small sites. However, the evidence for estimates of capacity on large sites more closely reflects factors such as the longer-term pipeline for development and the capacity for development on sites identified or allocated by individual boroughs. Delivering this pattern of growth is therefore a fundamental component of achieving overall benchmarks in previous versions of the London Plan; albeit the successive increase in benchmarks continues to indicate a step-change from past rates of development on large sites. Understanding the potential conflict between development on large sites and the anticipated increase in the delivery of 'small sites' is therefore of importance to this assessment.

Comparison Between Trend-Based Approaches

8-Year Trend-Based Approach

6.50 Approach 1 is a windfall assessment based on post-recession trends in housing completions on small sites between 2008/9 and 2015/16. Trends from office to residential permitted development rights have been removed from windfall assessments, as many boroughs have or are in the process of preparing Article 4 directions which remove the PD rights. The data informing Approach 1 separately identifies development on 'garden land' (i.e. infill within an existing residential curtilage). This source of completions is excluded (with exceptions for development involving the demolition and replacement of residential outbuildings). This is regarded as consistent with national policy for calculating windfall trends and reflects that this change in guidance arose within the respective 8-year period.

6.51 Whilst the technical methodology differs from the GLA SHLAA 2013 in terms of identifying retention of a small component of 'infill' development based on demolition of existing outbuildings the effect is very similar. This leads to around 90% of identified delivery of this development type being removed and around 10% retained. It is therefore possible to compare Approach 1 with the 'small sites' figure derived from the GLA SHLAA 2013 given the closeness of fit in terms of methodology. Any resulting difference(s) can therefore essentially be attributed to changes in levels of activity and factors affecting development within the relevant periods for assessing trends (FY 2004-2011 in the GLA SHLAA 2013 and FY 2008-2015 in the GLA SHLAA 2017).

6.52 It is immediately apparent that 8-year trends in small site activity calculated in this way compare very closely both at the west London level and within individual boroughs, irrespective of the different periods covered. Annual small site figures would increase on average 1.61% using the most recent 8-year period.

6.53 Given the closeness of small site trends it is therefore relevant to highlight that the more significant increase in the overall housing targets in west London (using Approach 1 and estimates of capacity on large sites) is derived almost entirely from increases in the latter category (c.40%). The resulting contribution of small sites (using an 8-year trend) would reduce marginally as a proportion of the total target (from around 20% in the GLA SHLAA 2013 to 15% using SHLAA 2017 evidence). Increased overall estimates of capacity focused on large sites are relevant for assessment in their own right in terms of potential implications for the availability of land and relationship with capacity and development on smaller sites:

WLB	Small Sites Target 2013					GLA SHLAA 2017 - Approach 1 (8-year trend)					Increase 2013-2017		
	Overall target	Large Sites	Small sites	(Other)	Small sites % of total	Overall Total	Large Sites	Small Sites - 8yr	(Other)	Small site % of total	Overall Target	Large Sites	Small Sites
Barnet	2349	1857	327	165	13.92%	2235	1896	305	34	13.65%	-4.85%	2.13%	-6.73%
Brent	1525	1045	263	218	17.25%	2150	1839	258	53	12.00%	40.98%	76.00%	-1.90%
Ealing	1297	898	301	98	23.21%	2036	1643	303	90	14.88%	56.98%	83.04%	0.66%
Harrow	593	320	251	22	42.33%	648	421	221	6	34.10%	9.27%	31.48%	-11.95%
Hillingdon	559	385	174	0	31.13%	964	788	176	0	18.26%	72.45%	104.52%	1.15%
Hounslow	822	661	161	0	19.59%	1683	1502	181	0	10.75%	104.74%	127.20%	12.42%
WLA total	7145	5166	1477	503	20.67%	9716	8089	1444	102	14.86%	46.60%	70.73%	-1.06%

Table 6.9 Small sites targets as a percentage of overall targets in each of the WLA boroughs in 2013 and 2017.

6.54 The GLA SHLAA 2017 allows the components of 'Approach 1' to be broken down in terms of their interrelationship with the treatment of different types of development on small sites under the 'modelled approach'. The 'remaining windfall' elements (i.e. Change of Use and new build schemes proposing more than 10 dwellings) are the same as in Table 6.8 summarising the draft Policy H2 Small Sites target above. The 'modelled elements' (i.e. conversions and new build schemes proposing 10 or fewer units) represent the remainder of activity monitored as part of past trends on small sites over the FY2008 – 2015 8-year period. It is this component that is substituted for the modelled figure in Approach 3. This breakdown is set out below.

6.55 The GLA SHLAA 2013 does not provide equivalent data for a like-for-like comparison. Appendix 7 of the GLA SHLAA 2013 lists 'change of use', 'conversion' and 'new build' development types separately but does not distinguish the 'new build' component by number of units proposed). However, the GLA SHLAA 2017 dataset for small sites extends to cover a 12-year period, including the FY2004 – 2011 series included in the GLA SHLAA 2013. It is therefore possible to provide a breakdown of the 'new build' component using this dataset (i.e. proportion of 'new build' schemes proposing 10 or fewer dwellings). This proportion is applied to the original GLA SHLAA 2013 figure to maintain consistency with the total trend and volume of development identified in that evidence.

WLB	Small Sites Target 2013			Small Sites Target 2017			Increase 2013-2017		
	Small sites	'Small Sites' Modelled Elements	Remaining Windfall	Small Sites (Approach 1)	'Small Sites' Modelled Elements	Remaining Windfall	Small Sites	'Small Sites' Modelled Elements	Remaining Windfall
Barnet	327	204	123	305	191	114	-6.73%	-6.37%	-7.32%
Brent	263	78	185	258	75	183	-1.90%	-3.85%	-1.08%
Ealing	301	142	159	303	149	154	0.66%	4.93%	-3.14%
Harrow	251	118	133	221	86	135	-11.95%	-27.12%	1.50%
Hillingdon	174	71	103	176	81	95	1.15%	14.08%	-7.77%
Hounslow	161	59	102	181	71	110	12.42%	20.34%	7.84%
WLA total	**1477**	**672**	**805**	**1444**	**653**	**791**	**-2.23%**	**-2.83%**	**-1.74%**

Table 6.10 A breakdown of the small sites targets components in the 2013 and 2017 London Plans

6.56 What is apparent from the data above is that the similarity in overall 8-year trends covering FY2004-2011 or FY2008-2015 extends to the sub-division of small site classifications employed by the GLA SHLAA 2017. There has been no overall reduction in the 'modelled components' in the more recent trend, suggesting no overall significant additional impact of policy constraints and equally no significant upturn in development activity. It is, of course, possible that these two factors could offset each other to some degree. The rate of development observed from the 'modelled' elements in LB Harrow indicates a -27% reduction between the two 8-year trend periods. This is an exception to the other constituent boroughs and provides the only strong indication of significant downward pressure on development volumes. This in-

fact masks the positive change observed in these development types in the majority of boroughs. LB Harrow has speculated that this reduction may be attributed to LB Harrow's Garden Land SPD adopted in April 2013, which seeks to prevent garden development proposals.

6.57 The boroughs demonstrate very similar totals for average activity; albeit a slightly greater proportion show a small decline. This is not necessarily surprising given that office-to-residential conversion under rights for Permitted Development are excluded from the trend-based figures. This activity is likely to have been undertaken as a substitute for other potential scope for site development in recent years (i.e. in place of full planning permission for Change of Use) and therefore the total volume of activity has been greater in the more recent 8-year trend period.

12-Year Trends in the West London Context

6.58 Approach 2 is a windfall assessment based on a 12-year period between 2004/5 and 2015/16. Within this scenario, no adjustment has been made to remove infill development within a residential curtilage development. This provides a comprehensive and evidenced based picture of the housing delivered in this period. The GLA SHLAA 2017 justifies the inclusion of this type of development within the 12-year trend to more accurately reflect proposals considered appropriate following planning applications. Paragraph 6.16 also reiterates that because development within a residential curtilage is a proxy measure a proportion of activity will not reflect the actual loss of garden land (i.e. it includes other forms of infill development or replacement of outbuildings). However, it is curious that this justification is only applied to the longer 12-year trend, which in principle also captures a longer period for assessing garden land development prior to policy changes at the national and London Plan level.

6.59 The other implication for Approach 2 including all infill development within a residential curtilage means that the annual average rate of development on small sites cannot be considered a like-for-like comparison against results presented under Approach 1 for an 8-year trend. It is noted that whilst Approaches 1 and 2 are included as part of analysis in the GLA SHLAA 2017 data under 8-year and 12-year trends was not included for discussion in the 'Housing Target Summaries' provided to each London borough.

6.60 The Housing Target Summaries use a different naming convention to compare approaches to generate the small sites target: Approach A and Approach B. Approach A is synonymous with Approach 1 in the GLA SHLAA 2017 (and summarised above); Approach B is equivalent to the results of the 'modelled' approach set out as Approach 3 in the SHLAA.

6.61 One of the purposes of Approach 2 set out in the conclusions drawn from data assessed in the GLA SHLAA 2017 is that this approach yielded higher average annual figures than Approach 1 for most of the London boroughs. This longer period

includes the pre-recession spike in annual net completions on small sites in 2004-8 (a period of stronger economic growth) and a decrease in completions from 2009-2013 resulting from the recession. The principle of highlighting these differences is not necessarily unexpected and carries forward recognition from the GLA SHLAA 2013 that 'new build' activity on small sites experienced sharp falls in FY2009 and FY2010, with only limited signals of recovery in FY2011. Likewise, this recognises that activity through small site conversions also decreased by a similar proportion compared to pre-recession trends over the same period with no upturn identified by FY2011. Activity through Change of Use on small sites was relatively static prior to and following the recession.

6.62 The principle of assessing a 12-year period is therefore valid. Providing a longer time-series for comparison acknowledges that factors affecting development may have changed over time (perhaps significantly) and ensures relatively recent historic contexts for decision-taking and activity are not lost altogether from the data series. In the event that the most recent 8-year trend does indicate lower levels of activity (i.e. because any upturn in development was not sustained or more recent planning policies have sought to constrain development) the 12-year trend will capture data from alternative periods for the purpose of comparison. Whilst the reasons for a lower trend in the most recent 8-year period might be multifaceted, comparison with a longer time-series may assist in selecting the indicators of change to focus upon.

6.63 However, Approach 2 in the GLA SHLAA 2017 does not allow such comparisons to be made in a straightforward way. Firstly, understanding total levels of activity in the 12-year period remains clouded by the different treatment of infill development within residential curtilage. It is not a like-for-like comparison with development covered in the 8-year trend. Secondly, the broad hypothesis addressed by Approach 2 (i.e. that a longer time-series will capture greater levels of activity for the reasons outlined) is not answered straightforwardly.

6.64 Approach 2 is presented in a way that to some degree assumes overall trends prior to the recession (i.e. higher levels of new build and conversion activity) and following the recession (i.e. potential increased constraints for development on small sites) apply equally across London. This is substantiated by Paragraph 6.18 of the GLA SHLAA 2017 – highlighting only 4 examples of London boroughs were the 12-year trend records lower levels of activity than the 8-year trend. In LB Brent more detailed analysis confirms that, in many cases, increased activity in the 12-year trend only occurs following the inclusion of infill development within a residential curtilage. The data for Approach 2 are not, however, presented in a way that allows comparison of whether annual rates of activity by including years prior to the recession are in-fact materially higher than taking the most recent 8-year trend at individual borough level. This is shown on the graphs below:

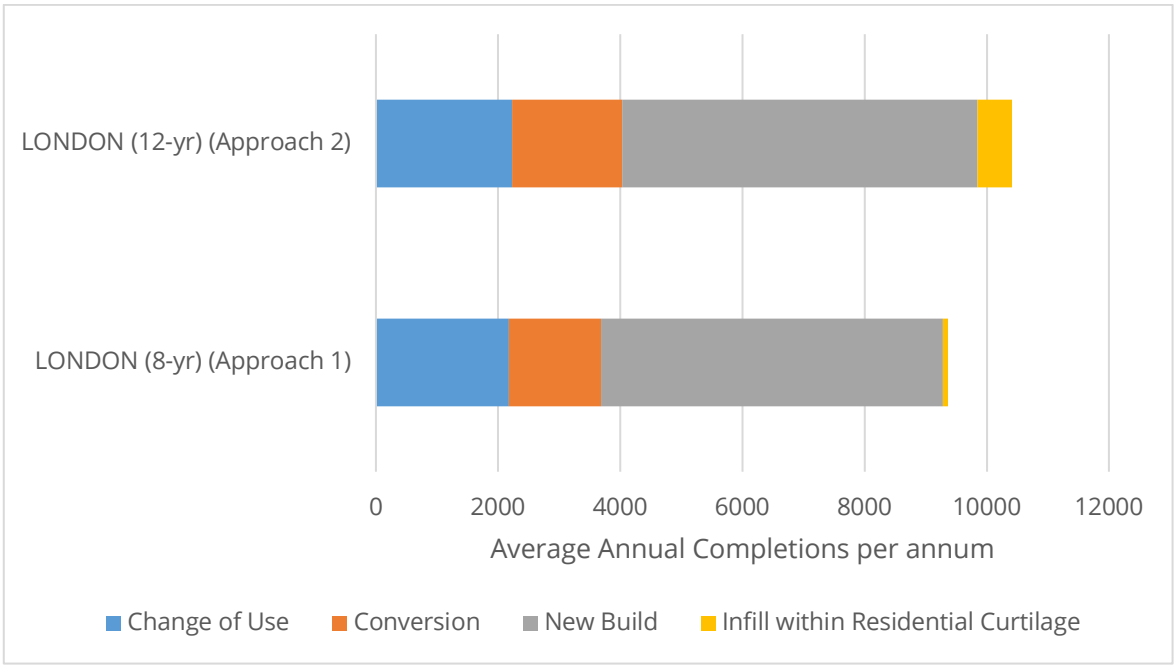

Figure 6.1: Average Annual Completions for 'Small Sites' by Development Type comparing Trends across 8-year (Approach 1) and 12-year (Approach 2) Horizons – London Total

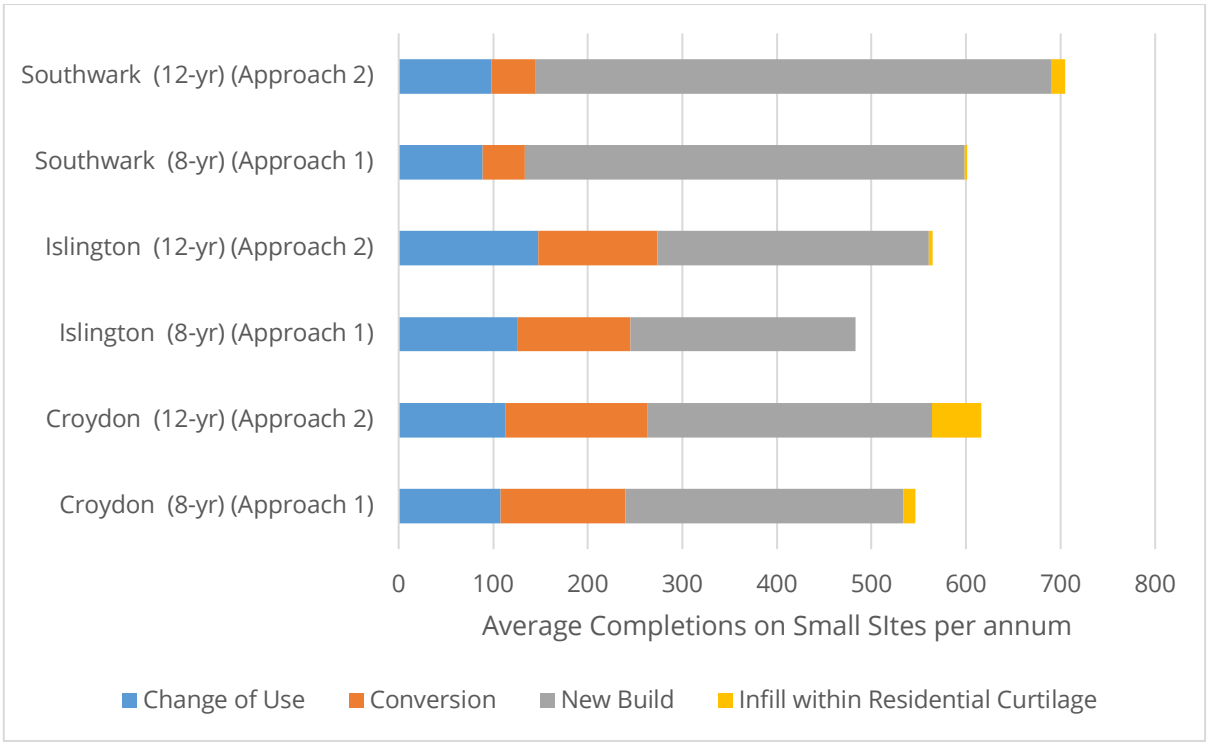

Figure 6.2: Average Annual Completions for 'Small Sites' by Development Type comparing Trends across 8-year (Approach 1) and 12-year (Approach 2) Horizons – Totals in Named Comparator Boroughs

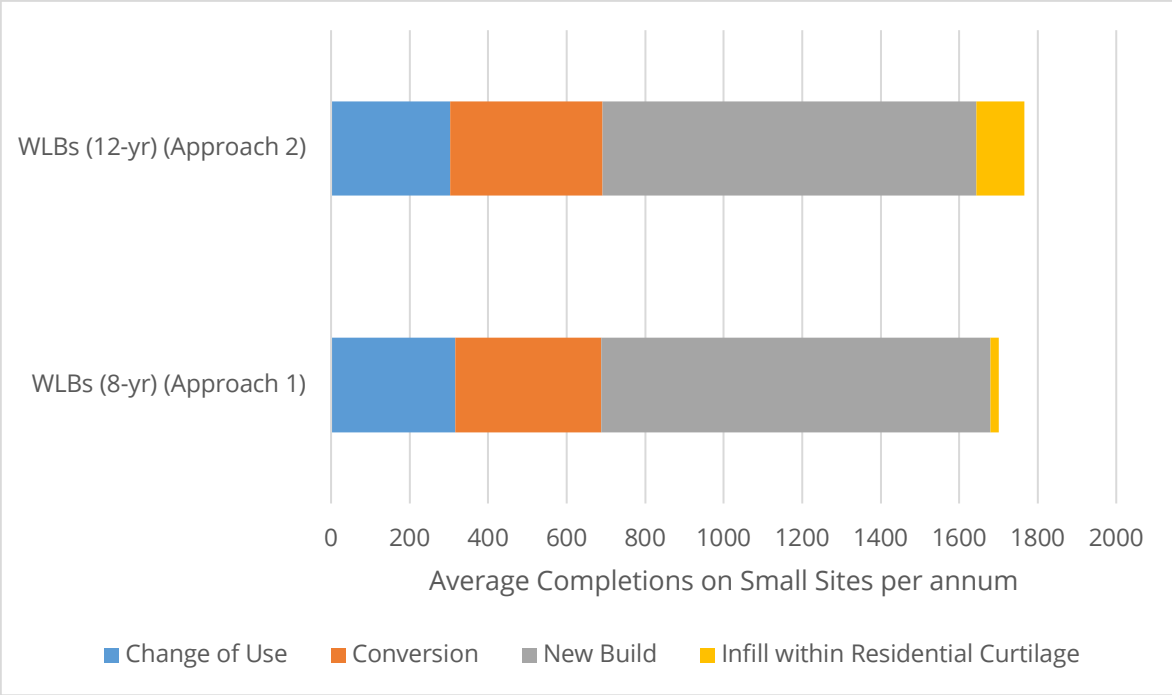

Figure 6.3: Average Annual Completions for 'Small Sites' by Development Type comparing Trends across 8-year (Approach 1) and 12-year (Approach 2) Horizons – Combined West London Boroughs Totals

6.65 For London as a whole we have identified that the assumptions for Approach 2 are generally borne out; notwithstanding the inclusion of infill development within a residential curtilage that boost the 12-year figure, outputs of 'new build', 'conversion' and 'change of use' are all lower in the 8-year trend. Comparator boroughs where this pattern is most clear are also illustrated in figure 6.2.

6.66 Particularly in the context of west London it is not the case that including data from a longer series captures trends in development indicating notably higher levels of other small sites activity in earlier years. Generally, this negates the perception of more recent constraints on development (whether relating to physical capacity for development, development economics or planning policy) limiting recent activity. Only the inclusion of infill development within a residential curtilage means that 12-year trend totals exceed the more recent 8-year period. This pattern is relatively uniform across all six boroughs.

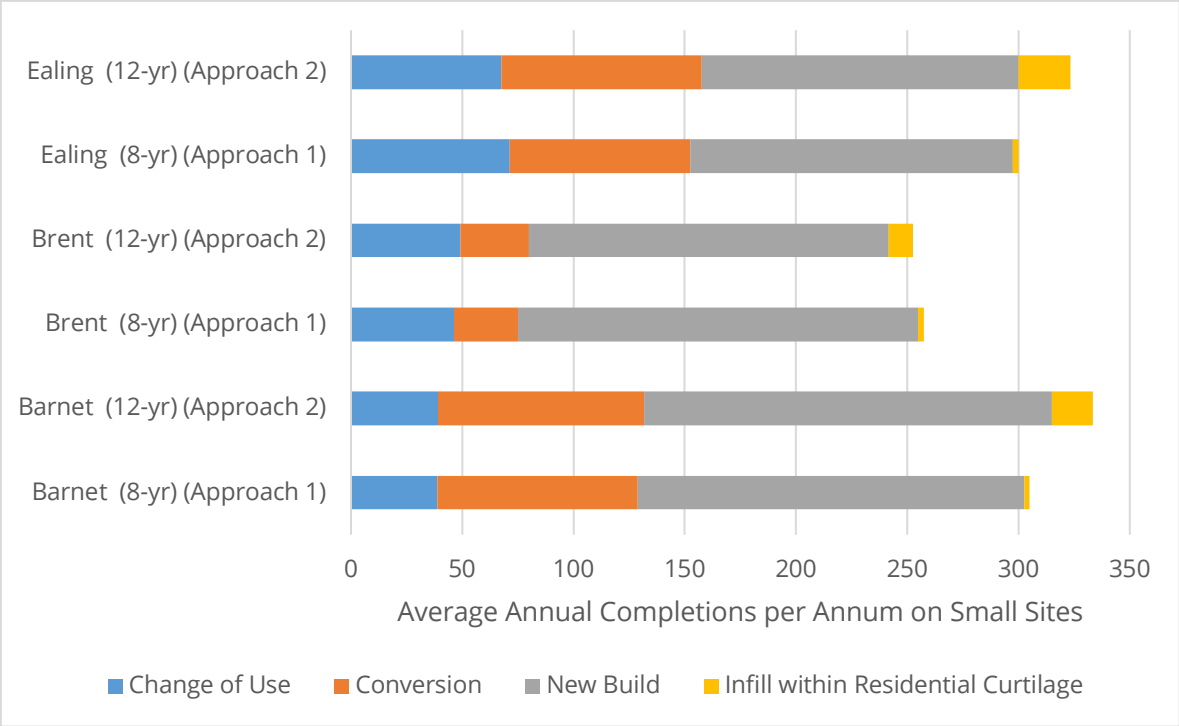

Figure 6.4 A Comparison of Approaches 1 and 2 in Barnet, Brent and Ealing

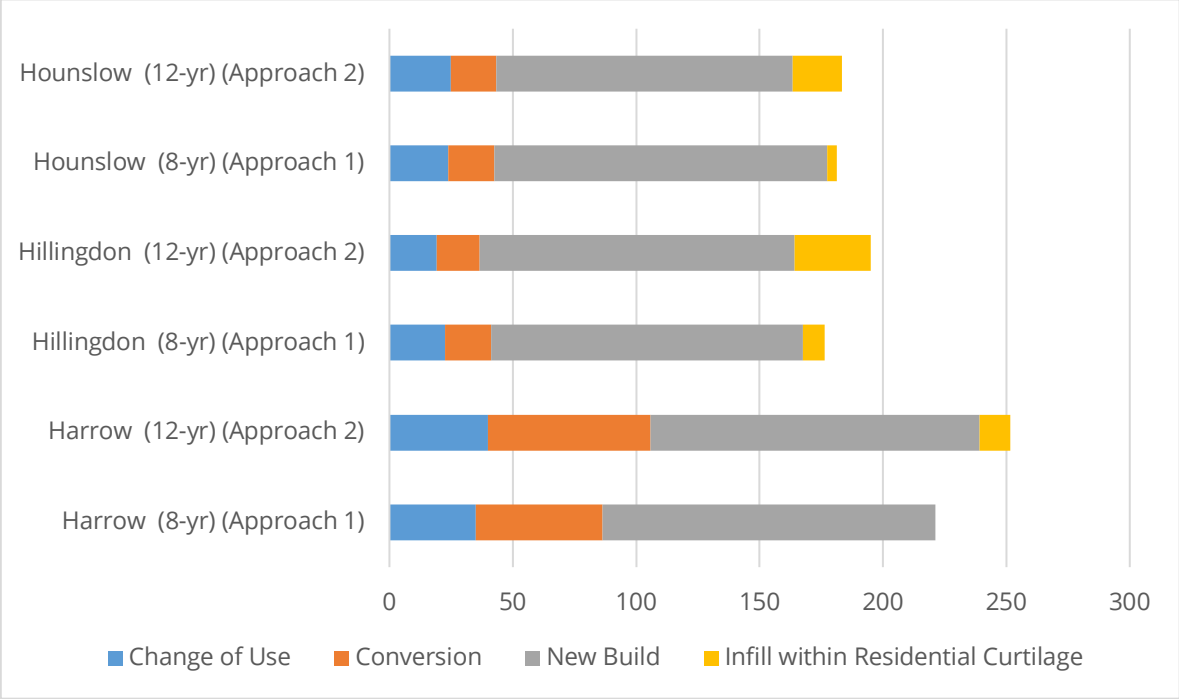

Figure 6.5: A Comparison of Approaches 1 and 2 in Harrow, Hillingdon and Hounslow

6.67 Given the significance of the different approach to treating infill development within a residential curtilage between Approaches 1 and 2 it is important to assess whether this reflects a trend (in terms of annual rates of 'garden land' development) that appears more pronounced in the longer-term series. The GLA SHLAA 2013 provides details of the adjustment to *per annum* rates of development on small sites associated with removing a proxy for 90% of this type of small site development. This can be compared with the annual rate of 'garden land' development included within the 12-year series for the GLA SHLAA 2017.

WLB	GLA SHLAA 2013		GLA SHLAA 2017 - Approach 2 (12-year)			
	Small Sites (Pre-Garden Land Adjustment	Annual Garden Land Adjustment	Small sites (8-yr Adjusted)	Approach B (12-year) (inc. curtilage infill)	Annual Curtilage Infill (Garden Land)	Approach B (less Garden Land)
Barnet	345	-18	327	335	18	317
Brent	269	-6	263	253	11	243
Ealing	324	-23	301	325	23	302
Harrow	264	-13	251	253	13	241
Hillingdon	205	-31	174	196	31	165
Hounslow	180	-19	161	184	20	164
WLA total	**1587**	**-110**	**1477**	**1546**	**116**	**1432**

Table 6.11 A comparison between the annual rates of garden land development included within the 12 year series for the GLA SHLAA 2017 and the GLA SHLAA 2013.

6.68 It is apparent that inclusion of an additional four years in the data series (FY2012-FY2015, which would typically show the greatest impact of changes to national and London Plan-led policy to restrict garden land development) have had little or no effect on rates of this development type. This is likely to be partly a reflection of proposals approved that do not in fact represent traditional loss of garden land and partly the approach boroughs take towards determining individual proposals.

Approach 3 – Comparison of the Modelled Approach with Past Trends

6.69 Figure 6.9 in the 2017 SHLAA compares the capacity estimates in approaches 1 to 3. Approach 3 (shown as a grey bar within Figure 6.9 of the SHLAA) estimates a far greater capacity than approaches 1 and 2 for almost all authorities. Approach 3 estimates do not increase substantially on approaches 1 and 2 in Tower Hamlets, Westminster, Hammersmith and Fulham and Camden. Approach 3 estimates a lower capacity in Islington, Hackney and City of London.

6.70 As we have illustrated, however, sub-divisions of the overall 0.25ha definition of small sites are relevant to the proposed operation of draft Policy H2. Likewise, these sub-divisions have an effect on the approach used to derive the small sites target themselves and the findings and comparison between Approaches 1 to 3 presented in the GLA SHLAA 2017. Having demonstrated that trends in 'remaining windfall' (change of use and new build schemes proposing more than 10 units) have remained more or less static these are projected to remain a relatively static component of the small sites target. It will nonetheless be important to understand specific patterns of development on small sites from this component. However, this finding magnifies that the unprecedented increase in forecast activity on small sites arrived at through the 'modelled approach' (Approach 3) represents an even sharper increase on previous trends in conversion and small-scale 'new build' development:

WLB	Small Sites Target 2013			Small Sites Target 2017			Increase 2013-2017		
	Small sites	'Modelled Elements'	Remaining Windfall	Small Sites (Approach 3)	'Modelled Elements'	Remaining Windfall	Small Sites	Modelled Elements	Remaining Windfall
Barnet	327	204	123	1204	1090	114	268.2%	434.3%	-7.32%
Brent	263	78	185	1023	840	183	289.0%	977.0%	-1.08%
Ealing	301	142	159	1074	920	154	256.8%	547.9%	-3.14%
Harrow	251	118	133	965	830	135	284.5%	603.4%	1.50%
Hillingdon	174	71	103	765	670	95	339.7%	843.7%	-7.77%
Hounslow	161	59	102	680	570	110	322.4%	866.1%	7.84%
WLA total	1477	672	805	5711	4920	791	286.7%	632.14%	-1.74%

Table 6.12 Increase in sites targets between 2013 and 2017 in each of the WLA boroughs

7. Analysis of 'Small Site' Modelling Assumptions

In this section we present specific analysis of the GLA's small sites modelling assumptions used to derive the targets in Table 4.2 of the draft London Plan 2017. This helps to understand the specific contribution each factor makes to the calculation of the overall estimate of capacity for development on small sites and introduces the potential relationship with other components of supply or factors affecting development.

Operating Criteria for draft Policy H2: Dwelling Stock Estimates

7.1 The inputs to the GLA's small sites modelling assumptions in terms of the dwelling stock used at the outset of the approach are summarised in Paragraphs 6.23, 6.25 and 6.32 – 6.34 of the SHLAA 2017. We do not propose to amend these elements of the methodology as a reasonably objective component of the approach.

7.2 We recognise that dwelling stock is not assigned to (or excluded from) the 'small sites' model at the level of the individual unit. Data is, however, modelled at the lowest level of spatial disaggregation (Output Area). The use of 'population weighted centroids', provides a specific location for intersection with the other operating criteria for the 'small sites' model (e.g. 800m Town Centre or Station buffers and to ascribe a particular PTAL rating to the Output Area). Where centroids fall just within relevant 800m buffers this might mean in some instances dwelling stock both inside and outside the 800m radius is counted towards the 'modelled totals'. However, in other instances the opposite case will be true and centroids lying just beyond 800m boundaries mean dwelling stock inside the buffer is not accounted for. Generally, the approach appears uniform and provides a consistent basis to applying other criteria for the small sites model.

7.3 Adjustments to exclude 'new build' development since 2001 and take account of net changes in housing stock since 2011 (conversions or demolitions) also seem to be robust, standalone, indicators of low development prospects. Both measures are dependent on the quality of information within the London Development Database.

7.4 The key point to highlight in terms of this aspect of the methodology is therefore the accuracy of the Census estimates of dwelling stock themselves. Any data quality issues in terms of the starting point for the model would have a significant impact on 'modelled' results. In preparing the assumptions for the 'modelled' approach it does not appear that consultation was undertaken with individual boroughs to ascertain

any known issues with Census data. This could have looked to corroborate other sources of information such as the Local Land and Property Gazetteer (LLPG).

7.5 Some of the constituent boroughs (such as LB Harrow) have stressed that such an exercise may be worthwhile where Council records suggest potential mis-identification of dwelling stock in the Census or other more recent changes to the use of property (such as conversion and sub-division) not recorded by the planning system. For example, LLPG records for LB Harrow indicate a lower total stock of non-terraced properties within 800m of a Town Centre or Station or with a 3+ PTAL rating.

7.6 On balance, and in the context of the overall results on the 'modelled' approach, we regard such work as potentially disproportionate and of limited benefit. The quality assurance methodology for the 2011 Census ensures counts of dwelling stock were subject to extensive validation, including through use of Council Tax data. More up-to-date local information is therefore only likely to relate to recent changes in the use of dwelling stock. We also recognise that the GLA would need to ensure consistency and further checks on data quality if any validation on stock estimates was undertaken using local information.

7.7 This does not mean to say that further information on the use of dwelling stock may not make a useful contribution to the robustness of targets generated by the 'modelled' approach. In preparing the assessment the use of some potentially beneficial indicators appears limited by the availability of data. For example, it was suggested that comprehensive and consistent data on the total number of Homes in Multiple Occupation would be hard to obtain even though some constituent boroughs have implemented licensing regimes. More broadly issues of tenure (including the percentage of private rented homes) may affect the capacity for development in an area. However, these are issues that would require further analysis rather than directly querying the starting point of the GLA's methodology.

Operating Criteria for draft Policy H2: Geography

7.8 An understanding of how draft Policy H2 is intended to operate from a geographical perspective is important for this critique. Part D of proposed policy H2 refers to the types of development covered by the presumption in favour of small housing developments. It is also this part of the policy that seeks to indicate the linkage between the operation of the *presumption* and securing its objective of the delivery of the small sites 'targets' in Table 4.2. This is illustrated below:

Part D of draft Policy H2

The presumption in favour of small housing developments between 1 and 25 homes

D To deliver the small sites targets in Table 4.2, boroughs should apply a presumption in favour of the following types of small housing development which provide between one and 25 homes:

1) infill development on vacant or underused **brownfield** sites
2) proposals to increase the density of existing residential ho**uses**~~mes~~ within PTALs 3-6 or within 800m of a ~~Tube~~ station[37A]~~, rail station~~ or town centre boundary[37B] through:
   a) residential conversions **(subdivision of houses into flats)**
   b) residential extensions **(upward, rear and side)**
   c) the demolition and**/or** redevelopment of existing ~~buildings~~ **houses and/or ancillary buildings**
   d) infill development within the curtilage of a house[37C]
3) the redevelopment or upward extension of flats**,** ~~and~~ non-residential buildings **and residential garages** to provide additional housing.

[37A] Tube, rail, DLR or tram station

[37B] District, major, metropolitan and international town centres- for the purposes of Policy H2D2, the 800m distance is measured from the edge of the town centre boundary

[37C] Subject to the total area of ground covered by buildings within the curtilage of the dwelling house not exceeding 50% of the total area of the curtilage (excluding the ground area of the original dwelling house), to be consistent with the Government's permitted development rights for a household set out in Part 1 of Schedule 2 of the Town and Country Planning (General Permitted Development) (England) Order 2015).

Figure 7.1 Part D of draft Policy H2

7.9 The reference to 'development types' within the presumption must be treated with caution. It does not appear to be the intention of Part D to exclude any of the broad classifications of development through 'New Build' or 'Conversion' schemes. Examples of each of these development types can be read-across from the types of scheme where the presumption would be applied in accordance with Part D. The role of qualifying criteria within Part D and subsequent criteria within the policy may have an effect in terms of the scale of development that may be sought and other standards that must be met in order for the presumption to apply but they do not operate at the level of excluding any broad types of development.

7.10 As we have illustrated the targets in Table 4.2 are in-fact a direct output from the GLA SHLAA 2017. They are a combination of 'modelled' and projected components to provide an estimate of 'windfall' development. In this respect the policy aims to demonstrate that it is evidence-led and that through its operation it will be able to secure the levels of delivery anticipated and the overall objective of sustainable development. Any conclusions of these points are likely to be a function of the

strength of the evidence base itself and the practical experience of managing and bringing forward development.

7.11 Given the origin of the 'small sites' targets and the data they rely upon It would be inconsistent with the methodology for the SHLAA if the intention of the presumption was only to be applied to certain development types. Indeed, this would be to overlook many of the characteristics of development on small sites within London.

7.12 It is understanding this relationship between the application of the policy and the evidence that it relies upon that is key to illustrating its purpose and what it seeks to achieve. It is these measures that the policy needs to be tested against and this needs to look beyond simply support for some development types and not for others.

7.13 For example, it is also not the case that the London Plan does not support examples of Change of Use and larger 'new build' development (also including proposals for over 25 units on small sites). However, in terms of the relationship of these development types as a component of the overall 'small sites' target (being based on past trends) the role of draft Policy H2 is less directly related to seeking an uplift in these types of activity.

7.14 The evidence base for the policy does not indicate that a specific departure from past trends is expected. It might otherwise be assumed (as part of a projected approach to calculating rates of 'windfall development) that levels of this type of development would be maintained irrespective of the role of the *presumption in favour of small housing developments*. It may be the case that other elements of the draft Policy H2 approach complement supply (e.g. through promoting site identification) but equally other factors affecting development may lead to a change in higher or lower levels of activity.

7.15 It is in terms of criteria (2) of Part D that the presumption in favour of small housing developments indicates that a specific approach must be applied for the purposes of decision-taking. The development types listed under criteria (2) are essentially likely to correlate with development types defined as 'Conversion' of existing residential buildings and a significant proportion of small 'new build' developments (1-10) units (specifically those where the existing use is residential). There is a strong link with the modelled elements of the 'small sites' targets developed by the GLA SHLAA 2017. However, the key operator for this element of the policy is not the development types listed but is defined by the following relationships as a function of geography:

7.16 This imposes the spatial extent (and limits) for applying these components of the *presumption*. These geographic definitions are identical to those employed within the GLA SHLAA 2017's small sites model. These criteria comprise:

- proposals within PTALs 3-6; or
- within 800m of a station (tube, rail, DLR or tram) (measured from the point of the station itself); or

- within 800m of a town centre boundary (District, Major, Metropolitan or International measured from the edge of the boundary).

7.17 For the avoidance of doubt there is **no further differentiation** to the 'small sites' modelling assumptions based on differences within these criteria. For example, no other input is adjusted based on the reason for a centre's classification within the hierarchy. Implicitly, the resulting contribution to the 'small sites' target may be affected based on an area's relationship to other inputs (e.g. a higher proportion of 'terraced' stock near higher density centres) but the SHLAA does not specify this.

7.18 There is an indistinguishable relationship in terms of how these geographic criteria lead to differentiation in the 'small sites' targets of individual boroughs and how widely (or not) individual boroughs will be required to operate these elements of the *presumption* in practice. This signals the potential for more unequal outcomes in terms of the effect on existing policies, implications for decision-taking and the deliverability of targets themselves.

7.19 It is therefore arguably these geographic criteria within the policy that provide the key function in maintaining consistency with the evidence base for the small sites target. Subject to other qualifying criteria – and notwithstanding those factors affecting development outside the control of individual boroughs – it is largely these geographical elements that define the scope of what draft Policy H2 (through part D(2)) seeks to achieve. This will in-turn have a major effect on individual boroughs in terms of the deliverability of targets and the action required in response to draft Policy H2.

7.20 The GLA SHLAA 2017 (Appendix B) provides some detail on the effect of the geographic criteria for the application of draft Policy H2 (and specifically t*he presumption in favour of small housing developments*). This information outlines, in broad terms, the inputs for the 'small sites' modelling assumptions. These comprise a breakdown of the dwelling stock in individual boroughs ('terraced' houses, 'non-terraced' houses and 'Flats, maisonettes or apartments') and the overall proportion of stock in PTALs 3-6 or 800m of relevant stations or town centres. Also provided is the relative distribution of housing stock inside and outside Conservation Area boundaries, given the significant effect on the yield growth rate assumption of dwelling stock subject to proposals for residential intensification on an annual basis (0.25% of stock rather than 1%). Other smaller adjustments to the small sites modelling assumptions (e.g. for recently built dwellings and Listed Buildings) are not set out separately but are likely to represent relatively less geographical differentiation in modelling outcomes.

7.21 The key relationship between the existing stock of *houses* and the application of the presumption in favour of small housing developments has been strengthened by Minor Suggested Changes to the draft London Plan 2017. These now specify the proposals for residential conversions covered by the policy are expected to comprise 'subdivision of houses into flats'. This directly relates to the modelling assumptions used to generate small sites targets i.e. these only derive estimates based on the intensification of existing housing stock, rather than all dwellings in an area. This emphasises the disproportionate effect of existing stock on overall targets.

7.22 Appendix B therefore provides a reasonable indication of the reasons the application of small site modelling assumptions may generate a higher target in one borough than another. The criteria for the 'small sites' modelling are relatively straightforward but will not affect all areas equally and depend heavily on the baseline dwelling stock. It is therefore the case that the 'modelled' figures for intensification across the individual West London Boroughs are varied and each is cumulatively a function of these different criteria. The outcomes of the modelling for each borough are summarised below. The range is substantial, with LB Barnet generating the second highest modelled figure for intensification amongst all London boroughs.

Borough	Annual Intensification – Terraced Stock	Annual Intensification – Non-Terraced Stock	Total Intensification	Average Rounded Annual Figure
Barnet	201	890	1091	1090
Brent	212	631	843	840
Ealing	332	588	920	920
Harrow	168	664	832	830
Hillingdon	143	535	678	670
Hounslow	162	410	572	570

Table 7.1 Summary of GLA SHLAA 2017 small site modelling outcomes

7.23 It is critical to recall that these modelling outputs are a forecast and do not directly follow past trends in activity; they act purely as a measure of capacity under the assumptions employed and are therefore only the starting point for this analysis.

7.24 Whilst it is not necessarily appropriate to apply findings across the West London Boroughs (WLBs) as a whole at this stage it is possible to highlight that the combined application of draft Policy H2's criteria do lead to higher than average estimates for intensification using the GLA 2017 methodology. This difference can most objectively be demonstrated by comparing the 'Outer' West London Boroughs with other locations dependent on their classification as 'Inner' or 'Outer' boroughs.

Borough	Annual Intensification – Terraced Stock	Annual Intensification – Non-Terraced Stock	Total Intensification	Average Rounded Annual Figure
Inner London Boroughs - Average	**170**	**139**	**310**	**305**
Outer London Boroughs - Average	**245**	**522**	**768**	**764**
Outer Non-West London	265	477	742	738
Outer West London Boroughs	203	619	823	820

Table 7.2 Summary of GLA SHLAA 2017 small site modelling outcomes by Inner/Outer classification and grouping of West London boroughs

7.25 In broad terms it is possible to highlight the reasons for this outcome in terms of the application of the criteria for small site modelling assumptions. Broadly this relates to the high proportion of houses (and in-particular non-terraced rather than terraced stock) present across the West London Boroughs. There is also a relatively lower instance of housing within Conservation Areas. The proportion of housing within 800m of a Town Centre of station boundary is more varied, although the percentage as a whole marginally exceeds the average for other Outer London boroughs. In some instances (e.g. LB Brent and Barnet) the proportion significantly exceeds the London average. For the purpose of the resulting modelled figure for intensification it is also likely to be important that the dwelling stock around relevant stations and Town Centres comprises houses (as opposed to flats or predominantly terraced housing as it may be in other locations). This itself would have a material effect on the targets generated by 'small sites' modelling assumptions.

Borough	Total Number of Houses	Proportion of Houses Within 800m Buffer or PTAL3+	Proportion of Houses (as % of all Dwellings)	Proportion of Non-Terraced Houses (as a % of all Dwellings)	Proportion of Houses within Conservation Area
Barnet	79745	74.4%	57.2%	40.9%	10%
Brent	53603	89.1%	47.9%	30.8%	9%
Ealing	69077	79.6%	54.9%	28.5%	10%
Harrow	60132	73.2%	69.5%	50.9%	4%
Hillingdon	75868	48.2%	73.0%	50.5%	8%
Hounslow	55349	62.9%	57.1%	34.1%	16%
West London Average	393774	71.2%	59.9%	39.2%	
London Average	1617660	73.5%	48.2%	25.0%	13%

Table 7.3 Summary of relationship of West London boroughs with key locational criteria for GLA SHLAA 2017 small site modelling assumptions

7.26 In principle this serves as the starting point to demonstrate that the analysis provided by the 2017 SHLAA is very limited in terms of its geographic understanding of development patterns and more detailed characteristics of the built environment (i.e. the distribution of rail stations and the hierarchy of centres). This potential for greater difference to exist at borough level is before having any regard to the characteristics of these individual town centres or the environment around stations themselves. More evidence on these aspects will therefore be explored as part of the critique and first explored in brief through the literature review.

7.27 One clear indication of this in west London is that the number of stations and town centre locations identified for the purposes of the small sites model exceed averages for the city as a whole, and particularly compared to other Outer London boroughs. This is demonstrated below. For stations this involves identifying the specific borough based on the point location of the relevant station. The situation is more complicated for town centres with more complex boundary geographies. These can straddle the classification of Inner and Outer London (i.e. 'mix') and may comprise an area partly within the area for the West London Boroughs and partly outside. The Kilburn 'Major' Centre boundary provides one such example on the Camden/Barnet border. We have identified 651 stations and 209 centres relevant to housing stock captured within relevant 800m buffers.

Planning Authority	Count of Centres	Count of Boroughs	Average (per Borough)
Non-West London			
Inner	81	14	5.8
Outer or Mix	78	13	6
West London Borough or Part West London Borough			
Inner	3	1	3
Outer or Mix	47	6	7.8

Table 7.4 Count of Town Centres used in the GLA small sites model- by relationship to West London

Planning Authority	Count of Stations	Count of Boroughs	Average (per Borough)
Non-West London			
Inner	280	14	20
Outer	227	13	17
West London Borough			
Inner	17	1	17
Outer or Mix	127	6	21

Table 7.5 Count of rail stations used in the GLA small sites model- by relationship to West London

7.28 The 'Outer' boroughs comprising the West London Boroughs for this study exceed the average incidence of station or town centre buffers captured by the small sites modelling assumptions. This is significant in its own right as part of the function of deriving a higher target for 'small sites' given the methodology in the SHLAA (and by extension the operating criteria for draft Policy H2). However, alongside illustrating this more extensive network of town centre and station provision calculated on a *per borough* basis it is also necessary to consider the effect across borough boundaries.

7.29 This is because the assumptions for the 'small sites' modelling are in effect boundary blind. Where the population weighted centroid of any given Census Output Area intersects with any relevant buffer (station or town centre) the annualised yield growth assumption is applied to the associated figure for adjusted housing stock and thereafter comprises part of that boroughs 'modelled' component of the small sites target. This is significant where the buffer used to capture housing stock may be based on a centre (town centre or station) not located in the same borough as the relevant Census Output Area. This can be illustrated by comparing the total number of station buffers contributing to housing stock subject to the small site modelling assumptions with the number of stations identified inside a given borough.

Borough	Stations Located in Borough	Count of Relevant Station Buffers Intersecting Census Output Areas	Adjusted Housing Stock Included in Small Sites Model for Individual Boroughs
Barnet	18	22	45,991
Brent	35	45	74,526
Ealing	28	39	68,122
Harrow	14	24	42,486
Hillingdon	18	15	32,270
Hounslow	14	26	39,806

Table 7.6 Comparison of stations by location (per borough) and count of station buffers used to capture housing stock within 800m for the modelled element of the small sites target

7.30 The same relationship applies to town centre locations, albeit this is more complex where the boundary itself straddles more than one borough. To summarise, whilst there are 50 centres located inside (or partly inside) the West London Boroughs there are 80 intersections between relevant 800m buffers and housing stock in individual boroughs. Many of these intersections relate to those centres within West London but others are not and are simply centres in adjoining boroughs that have buffers extending partly into the area.

7.31 This **'boundary blind'** dimension is significant because it means housing stock is employed for the purposes of generating the modelled 'small sites' target but may have very little relationship with the reasons (i.e. proximity to a relevant station or centre) it is captured under the qualifying criteria. For example, the borough that ultimately sees this relationship with modelling assumptions reflected in its housing target may have very little control over planning policy or regeneration initiatives applicable to a given station or Town Centre outside of its boundaries.

7.32 There are numerous examples both intra-borough relationships between the buffers of relevant stations and centres the overlap the administrative areas of the constituent boroughs. For example, dwelling stock in both LB Brent and LB Barnet is captured by the modelling criteria associated with the Cricklewood District Centre boundary. However, the policy context and prospects for development may be affected very differently by physical geography such as the Midland Main Line and route of the A406 North Circular and in policy terms where LB Barnet has taken forward the framework for regeneration of Brent Cross and Cricklewood.

7.33 There are other examples where the main administrative location of a given centre is outside the area covered by this project. For example, Kilburn is recognised as the second largest town centre in LB Camden and will be subject to preparation of a 'Place Plan' by that borough. LB Brent has separately prepared a Supplementary Planning Document (June 2017) covering the area of South Kilburn (adjoining Kilburn High Road). Dwellings within the area covered by the SPD (as well as some outside) are also captured by the assumptions for development in the 'small sites' model.

7.34 This may be further exacerbated by the nature of physical linkages and other competing land use pressures that may affect the prospects for development within the areas relevant to the borough in question (i.e. they may be more closely related with areas of employment provision).

The Equal Weighting of Geographic Criteria Including Treatment of PTALs 0-2

7.35 It is important to highlight that the small sites model does not employ 'double counting' of the housing stock within a given Output Area. While an Output Area may fall within both a town centre and station buffer inclusion with the modelled total for the 'small sites' figure is based on a YES/NO relationship with the overarching classification of 'PTALS 3+ or 800m of a town centre or station'. This is clearly indicated in the outputs presented within the GLA SHLAA 2017 (e.g. see Figure 11.2). The qualifying criteria are equally weighted and independent of one another – therefore areas with a PTAL 0-2 rating but within a relevant 800m buffer remain captured by the modelling assumptions to generate small sites targets. This is significant because it demonstrates that potentially significant differences within relatively small areas (i.e. all housing stock within an 800m buffer, some of which has good public transport accessibility and other parts where this is poor) is treated the same for the purposes of the methodology. This is an area we explore in more detail.

7.36 It is relevant to highlight that instances of better public transport accessibility in West London but outside of relevant 800m buffers are distinctly limited and have little effect on small site modelling outcomes. This is likely to be an effect of the well-developed station and town centre networks themselves and the characteristics of the built environment in locations outside these areas.

Borough	Adjusted Housing Stock in PTAL3+ Output Areas Outside of 800m Buffers Included in Small Sites Model
Barnet	835
Brent	374
Ealing	613
Harrow	300
Hillingdon	869
Hounslow	432

Table 7.7 Adjusted housing stock in areas with PTAL 3+ rating outside of 800m Town Centre and station buffers captured by small sites modelling assumptions

Calculation of Conversion Factors

7.37 The conversion factors employed by the GLA SHLAA 2017 have been identified as a specific area of concern in representations on draft Policy H2 submitted by the West London Boroughs. We agree with the principle of these concerns. At the broadest level this concern relates to the GLA having applied the same conversion factor to all London boroughs based on the overall average. The relevant extract from the GLA SHLAA 2017 is included below:

- A gross growth factor of 3.23 is applied to semi-detached and detached houses in the defined catchment area, meaning a net growth factor of 2.23 is applied to generate housing capacity estimates. This reflects London-wide trends in development on small sites[6] between financial years 2008/9 and 2015/16 where the existing and proposed use is residential (see Table 6.9/Figure 6.10).
- A lower gross growth factor of 2.34 is applied to terraced houses in the defined catchment, meaning a net growth factor of 1.34 is applied to generate housing capacity estimates. This reflects London-wide average trends in net additional housing provision from residential conversions for the same period residential (see Table 6.10/Figure 6.10).

Figure 7.2 Extract from the GLA SHLAA 2017 explaining conversion factors

7.38 The GLA SHLAA 2017 does disclose the overall findings on analysis to inform the gross and net conversion factors (Tables 6.9 and 6.10) although there is no detailed discussion of the factors affecting development that have led to these results and no detailed discussion of the dataset employed. It is apparent that there is variation between boroughs; and if borough-specific conversion factors were applied to the west London boroughs some would sit above and some below the average value employed in the GLA 2017 SHLAA.

7.39 In practice, substitution for borough-specific conversion factors alone would be unlikely to provide any further understanding of the source data and methodology for calculating conversion factors. We have been provided with a copy of the dataset employed by the GLA to generate the conversion factors. This relies on a separate query of London Development Database scheme-level data; albeit there is a close comparability with the trend-based data series used to assess overall trends in the SHLAA. The following key points arise to inform a critique of the approach:

- The trends in growth factors by the dataset are borough-wide – they have no regard to the locational criteria of draft Policy H2.
- The dataset uses records of completed schemes FY2008 – 2015. This means many schemes are likely to have been approved several years prior to the start of this series. This has implications in terms of how closely those schemes will

correspond to factors including the current capacity for development, existing patterns of application activity and the application of more recent planning policy (e.g. minimum space standards).

- The dataset includes infill development within a residential curtilage (i.e. 'garden land' development) where no existing units are affected by proposals (i.e. gross and net gain figures are the same for the purpose of the dataset). This would have a disproportionate effect in driving up conversion factors where these trends in development are most common.
- The dataset does not distinguish between the existing residential unit type (i.e. flat or house/bungalow) in calculating the sum total of relevant activity. This appears at odds with the fact the conversion factors are only intended for application to non-flatted properties within the small sites model.
- From our assessment the dataset does not appear to distinguish or separate activity by 'permission type' prior to inclusion within sum totals and the calculation of conversion factors. This is potentially significant as it means that gains in residential units outside of normal planning controls (e.g. Certificates of Lawfulness for Existing Use or Development) are included within the dataset. This has obvious implications for whether relevant development standards (e.g. floorspace, amenity, parking) have been complied with. Inclusion of such schemes within the dataset means they implicitly become part of the growth factors used to estimate future development totals and outcomes.
- Use of 'scheme level' data means that there will be instances of 'Hybrid' applications that generate a net gain in dwellings across a range of development types. Instances will be more limited because the GLA dataset is constrained to schemes within a 'residential' existing use category but there will be some instances of non-standard development typology (e.g. where a site can achieve partial redevelopment and partial extension of existing buildings).
- The calculation of gross conversion factors does not take account of schemes resulting in a net loss of dwellings (i.e. de-conversions and loss of existing residential uses).

7.40 Each of these factors may in practice be worthy of more detailed evaluation of the raw data used to generate the growth factors. It is also the case that there may be interrelationships between these areas so that they cumulatively could inform a more refined view of growth factors. Finally, it is not necessarily the case that applying all of these components would lead to lower growth factors – for example it is intuitively the case that where the existing property type comprises flats the growth factor achieved through redevelopment and intensification might be less.

7.41 The factors above are separate from any issues of data quality within the London Development Database. Specifically, we are unable to confirm whether for all schemes details of existing and proposed units have been accurately recorded. These issues are most likely in terms of recording aspects of proposals for Houses in Multiple Occupation (i.e. whether the existing and proposed number of units correctly reflects the individual property or incorrectly records bedroom numbers). These are issues we have identified in some instances of scheme-level data and could have a significant impact given the relatively small size of the dataset used to generate growth factors at borough level.

7.42 We have undertaken some additional analysis to illustrate potential relationships between the pattern of development and operation of draft Policy H2's criteria in West London. This has involved using the GLA's own dataset as a source and using the unique 'Borough Reference' for each planning application to populate additional criteria that may affect calculation of a conversion factor. These additional criteria (applied for all seven boroughs) identify whether schemes identified in the GLA conversion factor dataset fall within 800m of a Rail Station or Town Centre 800m buffer.

7.43 Because our dataset is based on London Development Database 'approvals' records for FY2004 – 2017 it is not necessarily that case that we will have captured the scheme level record (and therefore locational details) for all schemes in the GLA growth factor dataset (i.e. this may contain some instances of approvals pre-dating 2004). However, given typical timescales to deliver 'completed' schemes it is highly likely we have matched the vast majority of records to their relationship with relevant buffers. The results are tabulated below and illustrated by the corresponding graph for each of the 800m Rail Station or Town Centre buffer.

7.44 Refusals have been excluded from data analysis, as the reasons for refusal are not specified in the database and it is unlikely that Policy H2 would address reasons for refusal (such as lack of parking).

7.45 All results presented are for **'gross growth factors'** corresponding with paragraph 6.26 of the GLA SHLAA 2017. The 'net yield' generated by the 'small site' modelling approach assumes that one existing property is comprised within any future development proposals, meaning the net gain in dwellings would be equivalent to the gross growth factor *minus one*.

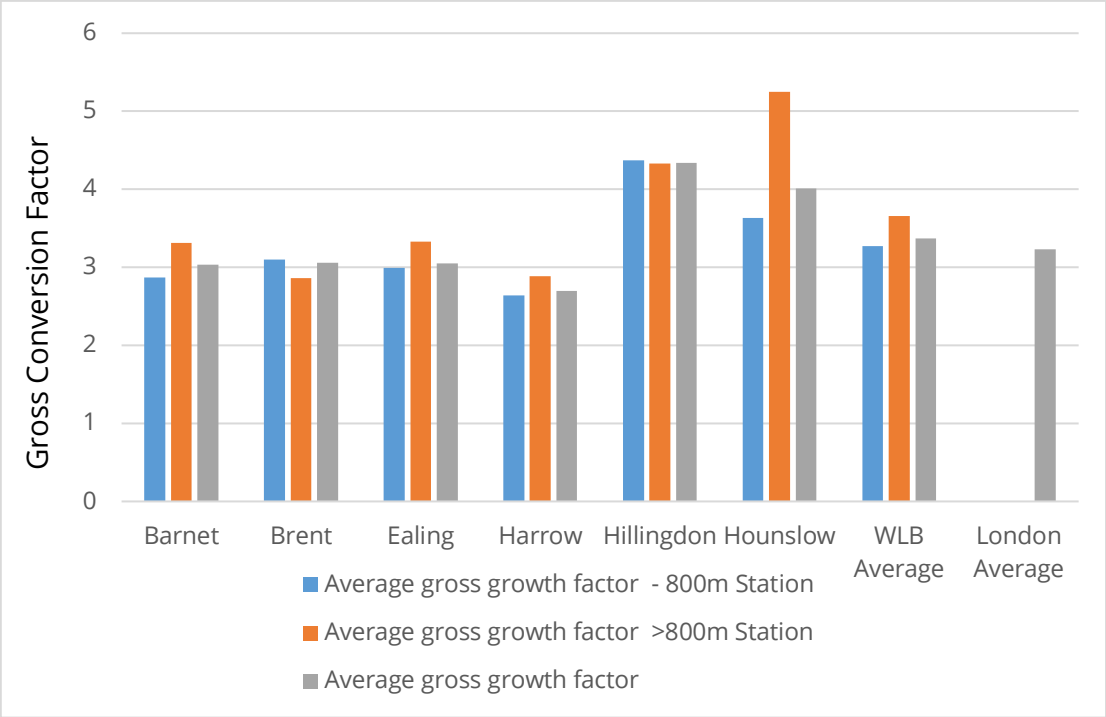

Figure 7.3 Comparison of Average Gross Growth Factors Inside and Outside 800m Rail Station Boundary

% Proposed Units within 800m of Rail Station	London Borough	Average gross growth factor - 800m Station	Average gross growth factor >800m Station	Average gross growth factor
61.0%	**Barnet**	2.87	3.31	3.03
84.5%	**Brent**	3.10	2.86	3.06
80.4%	**Ealing**	2.99	3.33	3.05
73.7%	**Harrow**	2.64	2.89	2.70
34.5%	**Hillingdon**	4.37	4.33	4.34
69.0%	**Hounslow**	3.63	5.25	4.01
67.2%	**WLB Average**	3.27	3.66	3.37
	London Average			**3.23**

Table 7.8 Average growth factors for each of the WLA boroughs in comparison to the London average – by relationship with relevant 800m Station boundaries

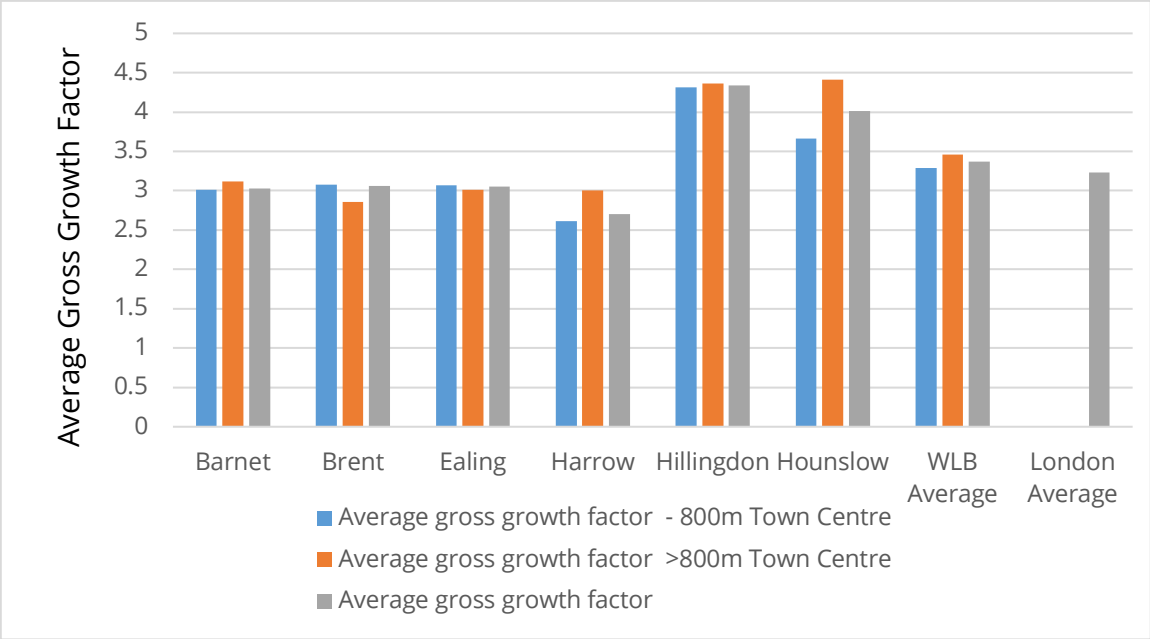

Figure 7.4 Comparison of Average Gross Growth Factors- Inside and Outside 800m Town Centre boundary

% Proposed Units within 800m of Rail Station	London Borough	Average gross growth factor - 800m Town Centre	Average gross growth factor >800m Town Centre	Average gross growth factor
80.3%	**Barnet**	3.01	3.12	3.03
88.7%	**Brent**	3.08	2.86	3.06
67.1%	**Ealing**	3.07	3.01	3.05
73.4%	**Harrow**	2.61	3.00	2.70
38.3%	**Hillingdon**	4.31	4.36	4.34
48.0%	**Hounslow**	3.66	4.41	4.01
66%	**WLB Average**	3.29	3.46	3.37
	London Average			**3.23**

Table 7.9: Average growth factors for each of the WLA boroughs in comparison to the London average – by relationship with relevant 800m Town Centre boundaries

7.46 The difference in gross growth factors is relatively modest dependent on locations inside or outside of relevant 800m boundaries. This is not altogether surprising, particularly given that for the west London boroughs a high proportion of housing stock that falls inside these boundaries. The distribution of development activity relevant to calculating growth factors broadly corresponds with this distribution of housing stock; although it does not appear that activity is disproportionately concentred close to town centres or railway stations.

7.47 It is the case that average gross growth factors (2.95-2.98) are lower at locations within the draft Policy H2 800m boundaries. This is on top of the trend identified that average growth factors are as a whole lower in west London (3.08) than the overall figure adopted in the GLA SHLAA 2017 (3.23). The pattern is not even across all seven boroughs. For example, lower growth factors within rail station boundaries are most clearly identified in LB Hounslow, LB Harrow and LB Ealing. There will remain differences between individual station boundaries and the characteristics affecting development in different locations.

7.48 Analysis of the dataset informing gross growth factors is also relevant because the size of the sample (in terms of the count of applications and number of units proposed) highlights the discrepancy with the levels of activity forecast by draft Policy H2. A fuller understanding of the characteristics of development would be likely to magnify this understanding. This is itself important for understanding the robustness of a modelled approach in terms of departing from past trends.

Within 800m of Rail Station				
Planning Authority	**Applications with Recorded Completions within Dataset**	**Sum of Existing Total Residential Units**	**Houses within 800m Rail Station**	**Application with Completions as a % of Stock (Houses)**
Barnet	428	404	40360	1.1%
Brent	315	257	37210	0.8%
Ealing	519	420	41633	1.2%
Harrow	297	258	31444	0.9%
Hillingdon	109	57	24630	0.4%
Hounslow	155	103	28372	0.5%
West London Average	**1823**	**1499**	**203649**	**0.82%**

Table 7.10 Analysis of the dataset informing gross growth factors (within 800m of Rail Stations). These figures relate to several years (2008-2015).

Planning Authority	Applications with Recorded Completions within Dataset	Sum of Existing Total Residential Units	Total Houses within Borough	Application with Completions as a % of Stock (Houses)
Barnet	691	628	79745	0.9%
Brent	379	308	53603	0.7%
Ealing	668	512	69077	1.0%
Harrow	403	342	60132	0.7%
Hillingdon	336	166	75868	0.4%
Hounslow	226	135	55349	0.4%
West London Total	**2703**	**2091**	**393774**	**0.68% (av.)**

Table 7.11 Total activity within growth factor dataset. These figures relate to total completions from 2008-2015.

7.49 The total number of applications recorded exceeds the number of existing residential properties affected. This reflects the inclusion of activity on existing residential plots involving no demolition or modification to existing dwellings. This is discussed further below. It is nevertheless the case that the total number of applications recorded which achieved completions represents a very small percentage of the housing stock in each borough.

7.50 Annualised rates are far below the levels of activity anticipated by draft Policy H2. Although marginally higher at locations within 800m boundaries of stations (in the example above) the difference is relatively modest. The development types covered in assessing growth factors do not represent all activity on small sites but would encompass the majority of examples based on the draft Policy H2 criteria. Equally there may be some instances where applications recorded in the growth factor dataset affect more than one existing property (e.g. by combining plots). Finally, the applications covered in the growth factor dataset include flats as well as houses in terms of reconfiguration of existing residential property. Whilst the comparison of activity with the stock of houses is relevant to evaluate activity against the approach to modelling small sites, the percentages calculated above are likely to over-estimate development as a proportion of housing stock.

7.51 We would also highlight that the relatively small size of the dataset (in terms of applications recording completions) highlights a need to compare this aspect of the trend with wider information on approvals and the implementation rate of schemes. This could highlight implications in terms of development timescales and the lapse rate of approved schemes.

7.52 Additional indicators can be added relatively simply using the London Development Database – such as the classification of existing units within a scheme (i.e. house or flat/maisonette). This is relevant because the modelled approach in the SHLAA assumes that growth factors apply only to the stock of houses and not flats. The sample to calculate gross growth factors nevertheless includes schemes comprising all existing property types. Finer-grained analysis can highlight that in some locations (i.e. schemes within 800m of a Town Centre) there are in-fact relatively few instances of conversions of houses as opposed to flats.

The Inclusion of Garden Land Development Within Growth Factors

7.53 In terms of the relationship between different development types and the overall sample size one of the most significant impacts on gross growth factors arises from the inclusion of the 'garden/infill' sub-classification of residential activity. This category is significant because it represents the gain of units without any effect on existing property as part of proposals (i.e. no demolition and therefore no difference between net and gross dwelling change). By extension this means that such schemes have a disproportionate effect in pushing up gross growth factors, which are generated by dividing the sum total of proposed units in a given borough by the sum total of existing units affected by proposals.

7.54 The table below illustrates the implications for calculating gross growth factors with and without the inclusion of the 'garden/infill' subcategory. The data and calculations are identical to the GLA's dataset with and without the filter applied to remove the subcategory. Note the number of existing units affected is unchanged between the two scenarios.

	Growth Factors – including 'infill/garden			Growth Factors – excluding 'infill/garden'		
Planning Authority	**Total Proposed Units**	**Total Existing Units**	**Gross Growth Factor**	**Total Proposed Units**	**Total Existing Units**	**Gross Growth Factor**
Barnet	1902	628	3.03	1667	628	2.65
Brent	942	308	3.06	738	308	2.40
Ealing	1560	512	3.05	1253	512	2.45
Harrow	925	342	2.70	812	342	2.37
Hillingdon	721	166	4.34	454	166	2.73
Hounslow	542	135	4.01	332	135	2.46
West London Average	**6592**	**2091**	**3.37**	**5256**	**2091**	**2.51**

Table 7.12 A comparison of calculating growth factors with and without the inclusion of the 'garden/infill' sub-category

7.55 There is a spatial dimension to this effect in that if the 'garden/infill' sub-category is removed from the analysis the relative reduction in growth factors is greater in locations outside the 800m buffers relevant to draft Policy H2. This indicates that opportunities for this type of development (particularly those achieving a greater intensification of residential use within a plot) are disproportionately concentrated further from town centre and rail station boundaries. This in itself is significant because as we have demonstrated the calculation of growth factors has no regard to these spatial trends. The overall values calculated (including the overall impact of including infill development within a residential curtilage) are applied to the 'small sites' modelling assumptions irrespective of where these development types are most common. It is demonstrably the case that in many instances opportunities for development will not exist without affecting existing properties on a site (i.e. demolition and replacement or to provide access) and therefore the net gain in dwellings achieved may be less than indicated as part of the GLA's modelling assumptions.

7.56 We have calculated the overall proportion of proposed units represented by the 'garden/infill' subcategory both inside and outside 800m boundaries. With these totals removed the resulting gross growth factors are indicated by the graph below and compared to the average with this development type retained as part of the total. It is clear that the gross growth factors are significantly lower. A reduction is observed in both locations inside and outside the 800m buffers (demonstrating some examples of 'garden/infill' development in each area), but with the subcategory removed the distinction between areas inside and outside draft Policy H2 catchments is generally reduced.

	Within 800m of RS Boundary		Not within 800m of RS Boundary		Total	
Planning Authority	**Proposed Units - Garden/Infill**	**Garden/Infill as % of Total**	**Proposed Units - Garden/Infill**	**Garden/Infill as % of Total**	**Proposed Units - Garden/Infill**	**Garden/Infill as % of Total**
Barnet	120	10.3%	115	15.5%	235	12.4%
Brent	181	22.7%	23	15.8%	204	21.7%
Ealing	221	17.6%	86	28.1%	307	19.7%
Harrow	77	11.3%	36	14.8%	113	12.2%
Hillingdon	85	34.1%	182	38.6%	267	37.0%
Hounslow	128	34.2%	82	48.8%	210	38.7%
Grand Total	**812**	**21.7%**	**524**	**26.9%**	**1336**	**23.6%**

Table 7.13 Units proposed within 'garden/infill' sub-classification as a proportion of total

7.57 Inclusion of the 'garden/infill' classification confirms that this type of development has been observed (and delivered completions) both inside and outside of relevant 800m boundaries over the most recent 8-year period. Nonetheless, the frequency of proposals is far below the levels anticipated by draft Policy H2 and the physical opportunities (and capacity for this particular type of development) will not necessarily be increased simply based on the proposed policy approach.

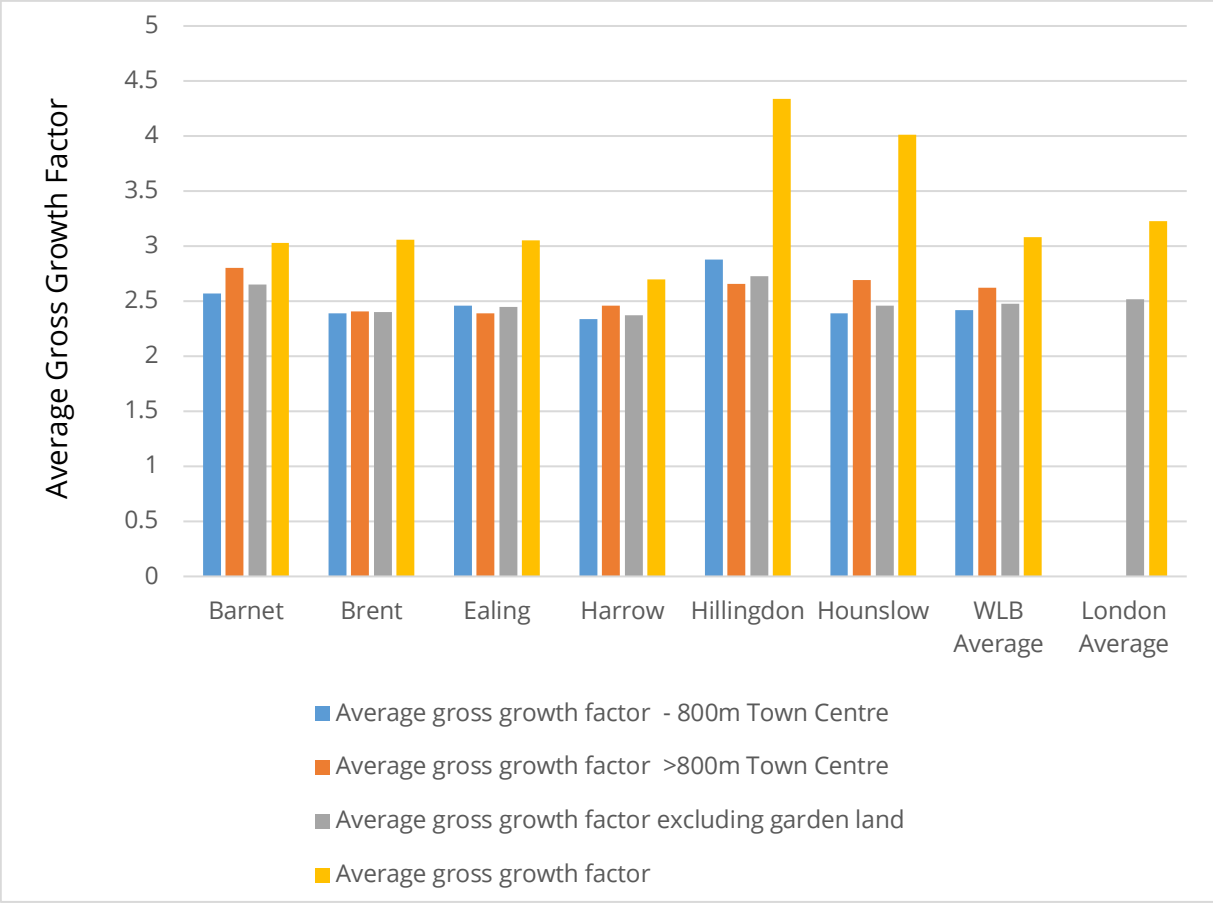

Figure 7.5 Comparison of average gross growth factors excluding garden/infill subclass- inside and outside 800m rail station boundary

7.58 We would therefore conclude that there is the potential to modify the gross growth factors calculated for the purposes of 'small site' modelling in the context of West London. This would employ a more sophisticated analysis of source data, taking account of the geographic criteria of draft Policy H2 and the appropriateness of including infill development within a residential curtilage amongst the development types used to calculate growth factors. Whether this is the most appropriate means of altering the approach is something we return to in subsequent discussion.

Other Demands and Uses for Existing Dwelling Stock

7.59 One area of concern identified by the West London Boroughs is that the modelling assumptions for residential intensification do not take into account the range of pressures on existing residential uses and potential implications for the net self-contained dwelling stock in an area. In broad terms, whilst a proportion of dwellings may yield additional completions through proposals for intensification these may be partly offset by losses elsewhere.

7.60 This appears to be a legitimate concern where a 'forecast' approach is followed. We have reviewed the datasets for Approach 1 and Approach 2 (8-year and 12-year past trends using a traditional projection of windfall activity). It is apparent that this evidence contains examples generating a net loss in dwelling stock (e.g. conversion of 2 flats back into a single dwelling – 'de-conversion'). An approach which looks to project forward past rates of activity is likely to reflect these pressures on development and land use, at least at a borough-wide level.

7.61 The implication of the forecast approach is that all activity relating to residential 'Conversion' and small new build developments (proposing 10 or fewer units) is removed from evidence of past trends. **This includes such instances of de-conversions.** It is a function of the dataset used to calculate gross conversion factors that only schemes generating a net gain of 1 or more unit are taken into account. This is sensible from the point of view of quantifying realistic estimates of capacity where intensification does take place. However, it means that whilst a single figure is applied on the basis of a 'yield rate' for the proportion of dwelling stock where intensification does take place **this is not tempered by any corresponding evidence of pressure on dwelling stock that may lead to a loss of accommodation**. This figure would in most cases be below the instances of opportunities for intensification but where downward pressure on dwelling stock is identified may justify a reduction in the yield rate.

7.62 It should also be noted that these pressures against schemes generating a net gain in dwelling stock may not lead to an overall loss of stock. For example, schemes for replacement dwellings (i.e. a 1-for-1 redevelopment with no net change in dwelling number) could also impact on opportunities for intensification. This may relate more widely to other characteristics and factors affecting development in the area (i.e. if pressure exists for larger single-family units or trends to provide 'executive' homes). Such instances themselves may reduce the capacity for development or substantially affect timescales for future proposals seeking to intensify housing within a given site.

7.63 Other examples of the use of existing dwelling stock that may indicate a need for development but not reflect the types of intensification envisaged by draft Policy H2 also exist. These include features such as the **provision of 'granny annexes' or staff accommodation**. These examples are relatively more uncommon in nature but nevertheless have an overall net impact on housing stock and potential the capacity for 'small sites' development that the GLA 2017 SHLAA envisages.

7.64 Finally, we do not identify any immediate conflict between the proposed approach in draft Policy H2 and the GLA SHLAA's assessment of the pipeline of 'Non Self-Contained (NSC)' accommodation. The estimated contribution from these sources of supply within the 10-year period comprises an existing pipeline of identified sites. Whilst this might include some very limited instances of proposals for large Houses in Multiple Occupation (*sui generis* HMOs) to replace conventional dwellings the impact on capacity for other small site development will be negligible.

7.65 However, Section 7 of the SHLAA (covering NSC accommodation) does specifically indicate that the existing pipeline should be treated as an under-estimate of the overall level of delivery likely. Paragraph 7.7 suggests this may require a re-evaluation against the capacity for conventional housing assessed on 'large' SHLAA sites. However, Paragraph 7.15 suggests there is no relationship with the 'modelled' approach to capacity on 'small sites', which assumes only the potential for net additional self-contained housing (Use Class C3).

7.66 We would suggest that monitoring future trends and in-particular the relationship of any additional non self-contained accommodation (particular large HMOs) with the criteria for draft Policy H2 highlighted. Any pronounced trend towards this pattern of development could restrict the capacity for development of 'small sites', contrary to the SHLAA's conclusions. Strictly this potential impact does not relate solely to large HMOs but might also apply to monitoring trends in the provision of small HMOs (3-6 persons; Use Class C4) albeit this pattern of development is not always identified within the planning system.

7.67 In order to quantify these concerns, it will be necessary to explore the prevalence of these patterns of activity and its relationship with the factors affecting development in West London e.g. lifestyles and demand for different types of accommodation.

Other Components of Housing Supply Identified by the SHLAA

The Delivery of Large Sites

7.68 It is not the purpose of this review to consider the GLA SHLAA 2017 findings on the capacity for housing on sites over 0.25ha ('large sites'). The actual methodology for identifying and deriving estimates of capacity is essentially a separate process to deriving the target for 'small sites' and not necessary to critique in detail. We will, however, consider where components of the approach to adjust the phasing or total capacity for development on large sites (essentially a probabilistic exercise) may actually increase the robustness of the approach towards small sites.

7.69 Paragraph 3.15 of the GLA SHLAA 2017 confirms that following engagement with individual boroughs the GLA took the opportunity to:

> *"consider whether any large sites showing housing capacity were more likely to come forward incrementally as small housing developments and which should therefore be deleted from the large site study to avoid any double counting between the large sites and small sites assumptions in the SHLAA."*

7.70 This acknowledgement is helpful as it captures how the GLA has sought to avoid potential double counting of capacity in one direction – ensuring that sites that may nominally exceed the threshold for large sites but have characteristics for development consistent with likely projected trends in 'small site' development are not picked up in both categories.

7.71 The pattern of supply on larger sites may, however, be of wider relevance. Whilst double counting is avoided in one direction it may be necessary to subsequently identify the interrelationships between development activity on sites which may at separate times (or across different applications on the same site) transcend the 'large' and 'small' site classifications. For example, small scale infill proposals for intensification or re-use of redundant land left over from a larger proposal would not be relevant to the above measure for avoiding double-counting but nonetheless only takes place because of the relationship with a larger proposal.

8. Relationship with Existing Planning Policies

This section recognises the need to understand the existing policy framework for promoting and managing opportunities for development and its relationship with the proposed step-change in delivery on small sites. It illustrates how the proposed approach within draft Policy H2 would relate to existing provisions within development plan coverage and supplementary guidance in West London. A key point to recognise within the position of existing policy is that provisions already vary from borough to borough and policy measures have not been static over time. There is evidence that policy has responded to changes in development trends and opportunities. It is therefore not correct to only interpret policy in terms of its effect on managing development on small sites but interrelationships with promoting other types and scales of development (including larger sites) and managing change in other land uses. Understanding existing policy and how it may change is equally relevant to assessing wider trends in development (such as through promoting growth and allocating land for development) and evaluating potential alternatives to the approach in draft Policy H2.

Introduction

8.1 The starting point for the analysis in this section leads on from a review of representations by the constituent boroughs as well as further engagement at the Part A workshop. These inputs demonstrate a clear understanding and detailed knowledge amongst individual boroughs of the evidence for and application of individual policies and how these currently affect development. This includes an understanding of the effect of patterns of activity on smaller sites but also how planning policy has increasingly promoted and achieved increased rates of development on larger sites and through regeneration.

8.2 To support this understanding, we have reviewed the development plan within each borough (at Appendix 2) to identify key sources and policies relevant to assessing proposals for development on small sites.

8.3 This is critical in terms of evaluating the future relationship with the proposed approach in draft Policy H2 and establishing why its impacts should be subject to more detailed testing.

8.4 These potential impacts are wide-ranging although in principle they can be summarised as the conflicts that will arise with draft Policy H2 and the implications for developing policy in future.

8.5 Understanding of conflict is two-fold and will firstly be a function of the weight given to existing policies where they do not accord with the provisions of draft Policy H2 including the *presumption in favour of small housing developments*. Minor Suggested Changes to draft Policy H2 seek to clarify this, specifying the boroughs *"should not refuse applications because of a conflict with local policies where these policies are inconsistent with Policy H2 and pre-date the publication of the London Plan."* However, it is also acknowledged that attributing weight to existing policies will remain a matter of judgement – for example indicating situations where the application of existing policy requirements for the retention of units providing family-sized accommodation (3+ bedrooms) may remain valid.

8.6 Logically this could provide cause for extensive debate at the development management stage. Conflict is also a function of geography; boroughs may logically continue to apply existing policies where the provision of draft Policy H2 (and the *presumption in favour of small housing developments)* do not apply leading to different decision-taking outcomes.

8.7 Implications for future policy-making will be multifaceted but would include the timescales and resources required to update existing policy. Given the range of measures indicated by draft Policy H2 as of potential benefit to managing development on small sites (including *area-wide Design Codes*, development briefs and allocating small sites for development) there is a wider relationship with evidence base preparation.

8.8 It is also necessary to evaluate whether the scope of draft Policy H2 is sufficiently robust to achieve the requirements for development on small sites or whether it precludes or works against alternative policy approaches to increasing supply. This may include the relationship with the allocation and delivery of large sites in a general sense. Minor Suggested Changes to draft Policy H2 for example already recognise that the *presumption in favour of small housing developments* should not apply if it would prejudice the comprehensive development of a site allocation but this does not necessarily deal with constraints on identifying future opportunities.

8.9 The context of individual boroughs may also be relevant in terms of whether alternative policy approaches might be better directed towards more area-specific support for regeneration and development. The impacts of draft Policy H2 should therefore be understood in whether its provisions would assist achieving such alternatives.

8.10 More widely these impacts cannot be divorced from development outcomes. Specifically, this includes understanding whether the level and types of development sought by draft Policy H2 accord with or depart from the evidence base that supports existing policy. This will ultimately determine the policy's impact and relationship with achieving sustainable development. This evidence base involves aspects such as housing need (including the need for family housing); standards for development, design and amenity; measures to safeguard local character; and protection for other land uses and open space.

8.11 We summarise this understanding below as it sets an important framework for subsequent stages of this assessment that look more specifically at factors affecting development and evidence for trends in development.

Policy Support for Development of Small Sites

8.12 There are numerous examples from the policies we have reviewed to illustrate support for the development of small sites. The types of development addressed generally align with the types of activity envisaged by draft Policy H2, though in some cases extend beyond those covered by the *presumption in favour of small housing developments.*

8.13 LB Brent's Core Strategy Policy CP2 seeks to promote additional housing as part of mixed-use development in town centres where public transport access is good; promoting residential development in mixed use areas is a positive step towards intensification. LB Brent's development management policy DMP14 (c) also favours small site development, allowing the release of local employment sites to non-employment uses where an employment use is unviable.

8.14 Further support for intensification comes from Brent's Policy CP6, which states that higher densities may be acceptable where PTAL levels would be raised as a result of development or through committed transport improvements. LB Ealing's Core Strategy Policy 1.2 also actively favours higher densities in areas of good public transport accessibility. LB Ealing's Housing Density policy in the Local Plan also recognises the benefits of high-density housing in high PTAL levels, provided that it is compatible with the local context.

8.15 LB Harrow Development Management Policy 26A is specifically supportive of small site intensification, supporting proposals to convert houses and other premises to multiple homes, so long as they contribute positively to their surroundings. LB Hillingdon's Development Management policy DMH3 supports the redevelopment of office accommodation into residential where this may not otherwise be covered by Permitted Development Rights, which may be permissive of other types of small site development in such cases.

8.16 Not all boroughs indicate an in-principle objection to all forms of development on garden land. LB Hillingdon's Policy DMH6 makes acceptable in some cases development on backland sites where this would appear more intimate in mass and scale than the frontage properties.

8.17 Highlighting such provisions (although not uniform in terms of their extent) substantiates the concern of some boroughs in terms of the practical effect of the *presumption in favour of small housing developments.* LB Ealing in their representation to the draft London Plan 2017 expresses concern that the introduction of a presumption in favour of small housing developments will not increase the delivery of small sites in Ealing, as the Council already take a permissive approach towards many forms of small-scale intensification. Ealing also question what the presumption in favour of small sites will materially add to the extant and well established NPPF presumption in favour of sustainable development

Policies restrictive of small site development

8.18 Some policies in the Local Plans of the West London Boroughs are not as conducive to small site development. Such policies generally relate to themes of meeting housing need and seeking to retain local character.

8.19 For example, LB Barnet's existing policy DM01 considers it appropriate to control the following types of development (which both have a close relationship with the GLA's assumptions for delivery of the 'small sites' targets) where local character and circumstances dictate:

> *"h. Conversion of dwellings into flats in roads characterised by houses will not normally be appropriate.*
> *i. Loss of houses in roads characterised by houses will not normally be appropriate."*

8.20 Measures to limit both conversions and change in development type resulting from demolition (i.e. 'loss') and potential replacement with alternative built form (e.g. flats or maisonettes) exerts stronger control of housing stock alongside other measures of local character (such as garden land an amenity space covered by point (g) of the same policy. LB Ealing's Development Management Plan Policy 7.4 also seeks to retain local character by requiring development to complement existing scale. This policy brings into question to what extent intensification can be achieved in a particular area and in development management terms requires judgement and justification for conclusions on existing character.

8.21 Barnet's policy DM07 also restricts the loss of residential accommodation, with exceptions (such as part (e)) where it involves identified regeneration areas with large scale demolition of housing and estate which provides for the net replacement of the total residential units. LB Harrow's development policy DM1 (E) also restricts development that would prejudice the future development of other parts of the site adjoining land or which would frustrate the delivery of adopted plans and allocated sites. Such policies echo other concerns of many of the West London Borough's representations to the London Plan in terms of small site development **interrupting large scale regeneration efforts by creating piecemeal development** that does not make the best use of land. These concerns are recognised in the Minor Suggested Changes to the draft London Plan 2017.

8.22 Some policies in the development plans of certain boroughs are restrictive of small site development as they seek to retain the existing housing mix. LB Brent's Policy CP2 in the Core Strategy requires that 25% of all new homes be 3 bed or more. This does not favour small site development as intensification targets on small sites may be more easily met with smaller units. This is reiterated in the Development Management policy DMP17 which seeks to maintain family sized housing (3 bedrooms or more), only allowing the conversion to two or more dwellings where the existing home is 130sqm and the conversion results in a 3 bedroom dwelling with access to a garden. LB Barnet's policy DM09 seeks to retain existing HMOs, restricting the conversion of such properties into separate dwellings. Whilst such development would help to meet small site targets the overall relationship with meeting needs and net housing supply is less clear.

8.23 LB Harrow's Core Strategy policy 4.5 is specifically resistive of development on residential gardens. This is in line with national policy, as noted in the Outer London Commission (OLC) 6th report (2016, p. 70) which highlights that the NPPF (para. 53) encourages local authorities to resist development on residential gardens. This brings into focus the conflicts based on the types of development (including infill development within a residential curtilage) promoted by draft Policy H2. The recent letter from the Secretary of State to the Mayor of London (27th July 2018) reiterates that Local Plans, specifically referring to the approach towards allowing development on residential development in the draft London Plan 2017, must be consistent with national policy in the NPPF (2012).

8.24 It is important to note, however, that just because it's a small site it does not mean that decision should be made on a single policy. As with larger sites, wider policy considerations will come into play. The size of site is irrelevant to the complexity of planning issues in the decision-making process. This is borne out through responses to the stakeholder engagement exercise in Part B.

Policy Support for Development on Large Sites and Site Allocations

8.26 Analysis of the existing policy framework his identified a need to further explore the merits and impacts of policy support for development on large sites.

8.27 The OLC report (2016, p 71) notes that a decrease in SME builders may be as a result of plan led approaches which favour large sites over smaller opportunities.

8.28 They postulate that the fact that large sites are easier to identify and allocate and have a significant impact on meeting housing need, whereas smaller sites are less likely to be allocated in Local Plans owing to the fact that they only provide small numbers of new homes. The Home Builders Federation (2015, para. 30) notes that this plan-led system has resulted in the restriction of the supply of smaller sites, which SME builders rely on. The OLC note that having to justify why development should occur on unallocated small sites is difficult for lesser resourced developers.

8.29 In practice these are claims that are likely to need careful evaluation. In-particular they should be viewed in the context of the generally strong performance against the 2013 London Plan's targets for the West London Boroughs. This period has corresponded with a period of significant work and support for the identification and development of allocations on 'large' sites. This also corresponds with other factors such promotion of the GLA's Opportunity Areas (including those located in West London) and trends towards increasing density boosting the capacity on identified sites.

8.30 There are indications that factors such as site size are taken into account in site assessment and selection, for example setting thresholds of 0.1ha below which sites are not considered further. However, these need to be viewed in terms of the fact that capacity of sites can vary widely, each will have different characteristics and any judgement is likely to be influenced by the types of opportunity available for assessment. More pertinently, authorities such as LB Ealing have taken a thorough and extensive approach to allocating a wide range of opportunities above this threshold that nonetheless technically comprise opportunities on 'small sites'.

8.31 The difficulty with the allocation of very small sites often relates to confidence in the assessment of factors such as availability and views on the achievability of development. Whilst many opportunities on the smallest sites are likely to be suitable in principle, opportunities to support residential development through the plan-led system may not be evidenced where sites are occupied by existing alternative uses. In such circumstances the benefit of a development plan allocation may be negligible, and in-fact offer limited prospects for development. Such plan-led opportunities may also be hard to differentiate from typical examples of *windfall* development, particularly where development of candidate sites may qualify for rights under

Permitted Development or encouraged by policies supporting Change of Use and redevelopment in appropriate circumstances.

8.32 The proportion and number of development plan allocations on smaller sites does not therefore automatically translate into evidence of support or resistance to these types of development.

8.33 Nevertheless, relatively fewer allocations on small sites does represent a restriction in respect of publicly identifying development opportunities. The HBF (2015, paras. 31-32) recommend that Local Plans should be required to provide the widest possible range of sites, in terms of size and location, so that SMEs can find suitable sites. This is an issue that has since received attention at a national level.

8.34 New measures that require the production of Brownfield Land Registers go some way to encouraging Local Authorities to publicise a wider range of site sizes. Local Authorities are now required to maintain registers of brownfield land and have been encouraged to provide Permission in Principle (PiP) for suitable sites. The OLC 6th report (2016, p. 71) argues that the identification of such sites would improve knowledge about the available opportunities for small builders in an area.

8.35 Part C of draft Policy H2 requires Boroughs to increase planning certainty on small sites by listing sites on Brownfield Land Registers and granting permission in principle on specific sites. The first Brownfield Land Registers were published in December 2017, however few authorities have granted Permission in Principle to date; it is unclear as to whether this method of site identification has had any effect on the SME market at present. Draft Policy H2's encouragement of the measures (as well as the allocation of small sites) is positive but the policy's impacts have not been tested in terms of the extent that they would provide additional, independent support for development on small sites.

8.36 The GLA 2017 SHLAA could realistically be expected to have considered the potential outcomes under Part C alongside existing trends. This is because draft Policy H2's targets for small sites (both the 'modelled' and 'projected' components) essentially reflect a measure of activity on previously unidentified sites. As measures of 'windfall' development both should indicate robust and reliable sources of supply independent of plan-led processes. If plan-led or site identification-based approaches are expected to specifically contribute to supply these should be quantified and it would be necessary to ensure this contribution does not 'double count' activity already occurring through development management.

The Relationship Between Existing Policy and the Wider Development Process

8.37 Our assessment of the role of existing policy framework has also identified that this cannot be entirely separated from its application as part of the wider development process. It is unlikely to be the sole or even key factor behind observed trends. We have already partly illustrated this through analysing the similarity of rates of small site delivery in West London over 8-year and 12-year periods, notwithstanding different policies applying during this timescale.

8.38 We would also highlight that the existing policy framework governing the principle of development on small site and specific policy considerations (e.g. amenity and local character) does not represent the only control over development. Numerous policy requirements and development standards apply irrespective of the scale of development. In the case of matters such as internal and outdoor space standards and parking (car and cycle) requirements these have changed over time and may affect development trends but are not solely an issue for small sites. Other technical requirements such as flood risk, drainage and biodiversity may have a relatively greater effect on small sites but are location-specific and not intended to specifically seek to restrict certain types of development albeit they may take account of cumulative impacts of growth.

8.39 The OLC 6th report (2016, p. 82) also looks at the impact of development management on development. Firstly, they note that resourcing is an issue in Outer London boroughs as large-scale development applications are more intermittent than in the Inner boroughs, and therefore these departments do not always have (and cannot always recruit easily) the resources and skills needed to assess such applications. In the context of draft Policy H2, when small site development applications are increased (by up to 257% in the case of LB Ealing), resourcing problems could go one of two ways: local authority planning departments will struggle to deal with the volume of small site applications, or they will be able to better resource themselves, as the stream of small site applications will be steady. The latter would be expected to correspond with increased receipts from application fees and increasing resources for staff recruitment and retention. Feedback from our workshops with the constituent boroughs indicates the need for caution on this conclusion, with applications for small sites typically regarded as more resource-intensive and time-consuming relative to application fees. This would indicate a need for greater efficiencies in the development management process or an increase in the quality of applications assisting with determination.

8.40 Secondly, the OLC report (2016, p. 84) highlights that often Section 106 negotiations are not efficient enough, starting too late in the planning application process and taking too long due to the lack of incentive for authorities to resolve negotiations. The OLC state that s106 negotiations require complex legal and financial knowledge and, as such, resolution involves time and resources that authorities do not always have. DCLG, in their Speeding up Negotiations report (2015, p.6), argue that the implementation of the Community Infrastructure Levy should help to speed up negotiations, as s106 agreements will be scaled back making them quicker to negotiate. CIL, however, will not necessarily make small site delivery more forthcoming; the difficulties with CIL as a barrier to small site delivery have already been discussed earlier in this report.

8.41 The OLC report (2016) also focuses on the impact of the viability appraisal process on delays and uncertainty in the planning application process as local authorities see the current approach to viability as overcomplicated. A report by LSE (2015) also noted that the viability approach has resulted in growing frustration for both the public and private sector, as policy requirements regarding viability are not fixed and are negotiable. The OLC report argues that the approach in the 2016 London Plan to securing 'the maximum reasonable amount of affordable housing', although flexible, creates a degree of uncertainty. Although the draft London Plan 2017 sets a plan wide fixed target for affordable housing to avoid this uncertainty, draft Policy H2 requires boroughs wishing to apply affordable housing requirements to ask for cash in lieu for off-site affordable housing. Viability and deliverability concerns also may result from this ambiguous approach.

8.42 The OLC report (2016 pp. 88-89) also highlights that Right to Light conflicts are a barrier to site delivery, as higher density development means that sites will be relatively close to adjacent buildings. Legally resolving such issues prior to development has cost implications in addition to delaying development. In regards to small sites, where development may involve infill sites and upwards extensions of flats, Rights to Light may become a protracted issue that prevents development commencing irrespective.

9. Assessment of Factors Affecting Capacity

This section represents the key component of the 'Critique' provided by Stage 2 of the assessment. It represents the opportunity to detail and outline the justification for specific analysis and interpretation of key factors identified as relevant to the capacity for development on 'small sites' in the west London context. Key evidence which supports or refutes the importance of these factors is addressed within this section. This evidence is evaluated in terms of the extent to which it is reflected in the GLA SHLAA methodology its relevance to assessing the impacts, effectiveness and achievability of draft London Plan 2017 Policy H2 - in-particular the implications for specific targets for the delivery of small sites.

Introduction

9.1 The purpose of this section is to bring together findings on the review of the SHLAA methodology, national policy and guidance and the wider literature review and to illustrate focused areas for the critique in the context of West London.

9.2 It brings together specific components of the 'small sites' methodology and other secondary data alongside other spatial planning considerations. These other spatial planning considerations are drawn from the range of data available to inform this project. They relate to physical land use, definition of local character, potential constraints on development and indicators of sustainability. Broadly, these are summarised as follows:

- Census data on topics covering household and family composition as well as travel methods.
- Adopted and emerging development plan allocations identified by the constituent boroughs.
- Designated Open Space, using the same spatial data as mapped in Figure 2.13 of the GLA SHLAA 2017 (comprising Green Belt, Metropolitan Open Land and the open space hierarchy of individual boroughs, where provided).
- Application of the SHLAA Character Map alongside the 'small sites' methodology.
- Mapping of PTAL data to Output Area level (already part of the 'small sites' modelling assumptions).

- Strategic Industrial Land and Locally Significant Industrial Site Designations (mapped by area and calculated as their percentage coverage inside relevant 800m buffers for the 'small sites' modelling assumptions).

9.3 We have aimed to apply these datasets consistently where they assist in illustrating key areas of concern with the GLA 2017 SHLAA methodology and where this could take greater account of factors affecting development. The datasets employed may be significant in their own right but we have also considered it relevant to explore potential relationships between the factors. These are not necessarily the only relevant relationships or necessarily the most significant but have been applied as a matter of judgement from the evidence available. We have prepared maps broadly illustrating these key land use indicators at Appendix 5.

9.4 This section informs the initial conclusions on the Stage 2 critique in terms of signalling the potential wider impacts of draft Policy H2 and the potential relationships with existing policies and alternative future options. It also provides a platform to be potentially corroborated with or further complemented by an understanding of delivery patterns.

9.5 We do not at this stage of the project use the findings from this analysis to apply specific adjustments to the GLA's 'small sites' modelling assumptions although demonstrably the indicators and datasets form further potential inputs and a potential justification for varying the existing approach. However, it would arguably be inappropriate and potentially arbitrary to do so without a wider understanding of delivery patterns and also without making judgements on whether the best alternative (either overall or in specific locations) would be to depart from the 'modelled' approach altogether.

The Application of Character Assessment to Small Site Modelling Assumptions

9.6 The literature review for this project has dealt with the updates to the SHLAA Character Map that continue to provide an input to the assessment of potential development capacity on large sites. Our review of the 'small site' modelling assumptions confirms that this has not been deployed as an input or to modify any of the criteria used to derive targets for development on 'small sites'.

9.7 Our summary finding is that this represents a weakness in the 'small sites' model and makes it particularly unresponsive to any reflection of local character. The SHLAA Character Map employs a number of features that in-principle make it a potential tool to modify the 'small sites' targets derived by the GLA SHLAA 2017. Equally it has potential draw backs that might limit its explicit application to derive an alternative approach to estimating the capacity for development on small sites. We are also mindful that an explicit objective of draft Policy H2 is to recognise that the character of certain areas will change over time as a result of new development. The exclusion of whole components of the model based on a single characteristic (i.e. 'suburban character' as defined by the Character Map) would seem contrary to this principle. However, it should be kept in-mind that the Character Map definitions of 'urban' and 'central' character comprise large areas around designated centres and in-fact represent the prevailing pattern of residential development in West London.

9.8 This is because the criteria of the updated SHLAA Character Map (see Table 9.1) are applied on an either/or basis – i.e. if the requirement of either column is applied the relevant 'central' or 'urban' type is applied, beyond which an area is classified as 'suburban'.

9.9 Amongst the strengths of the SHLAA Character Map are the use of 'networked buffers' to reflect more realistic pedestrian access routes and behaviours. Conversely the GLA 'small sites' methodology (as confirmed by Minor Suggested Changes) uses a 'straight line' or 'crow flies' 800m buffer from relevant town centre boundaries. This was a specific criticism of the previous 2013 SHLAA Character Map, notwithstanding that the size of the ped-shed catchment has been increased in the latest version.

SETTING	CHARACTERISTICS	
	Typology	Proximity to Town Centre
Central	>75% flats	1km[9] (960m) networked buffer[10] from edge of International, Metropolitan or Major Centre boundary
Urban	>75% flats and terraced housing	1km (960m) networked buffer from edge of District Centre boundary
Suburban	All other areas	All other areas

Table 9.1: Characteristics of the settings within the SHLAA Character Map

9.10 One restriction on a simple application of the Character Map to the 'small sites' model are that its finer grained definitions do not obey statistical or administrative geographies. Character areas can and do cut across Output Area boundaries. The only option is therefore to apply a consistent approach with the rest of the 'small sites' assumptions and assign each Output Area to the Character Map depending on the character area its specific Population Weighted Centroid falls within. We have prepared comparative maps and find that this generally retains a high degree of consistency though where centroids fall nearer the town centre boundary there is a greater likelihood of an entire Output Area being assigned an 'urban' or 'central' character where in reality it may be split between both. The converse possibility is true if a centroid lies further from the town centre. These are illustrated at Appendix 4.

9.11 Having introduced the SHLAA Character Map in this way it is possible to illustrate that it provides one possible impression of the character of development inside relevant 800m station and town centre buffers applied in 'small site' modelling assumptions. Notwithstanding that the Character Map methodology applies greater maximum distances for walking catchments there are a proportion of Output Areas within a

[9] A 1km (960m) buffer is considered to bring the map closer in line with the methodology used to calculate PTAL and reflect faster observed walking speeds in London

[10] Networked buffers taken from the boundary of town centres are taken to better reflect actual walking distance to town centres.

high number of buffers that are classified as 'suburban' in character. This is not a situation unique to West London, as illustrated in Table 9.2 below. The proportion of dwellings subject to the small site modelling assumptions and regarded as 'suburban' for the purpose of the SHLAA Character Map averages around 25% of the total. This average is similar for the 'Outer' West London Boroughs and other 'Outer' boroughs not forming part of the WLA.

9.12 This masks variation within the constituent boroughs (and no doubt within other areas of Outer London). The proportion of dwellings classified as suburban in each of the seven West London Boroughs is shown in Table 9.3.

9.13 LB Hounslow, LB Hillingdon and LB Ealing in-particular have high proportions of dwellings that match with areas in the 'suburban' character type and exceed the wider Outer London average. This is not simply a function of proximity from Central London and there could be a range of reasons that the extent of 'networked buffers' applied to the SHLAA Character Map are constrained compared to an 800m 'crow flies' buffer in the SHLAA 'small sites' model.

9.14 As an initial test we produced a version of outputs from the SHLAA 'small sites' model that excluded dwellings in 'suburban' Output Areas. The results, and percentage difference with the modelled component of the draft London Plan 2017 'small sites' target are shown in Table 9.4 and Table 9.5.

Borough Grouping	All Dwellings (Terraced and Non-Terraced) within 800m of Town Centre or Station	Total Dwellings in Output Areas Classified as 'Suburban' Character	Proportion of Dwellings in 'Suburban' Typology
Inner London Boroughs - Total	330,108	12,565	3.8%
Outer London Boroughs - Total	825,149	213,746	25.9%
Outer Non-West London Total	553,336	141,275	25.5%
Outer West London Boroughs Total	271,813	72,471	26.7%

Table 9.2: Proportion of dwellings across London as a whole classified as falling within a suburban setting in the SHLAA character map

WLA Borough	All Dwellings (Terraced and Non-Terraced) within 800m of Town Centre or Station	Total Dwellings in Output Areas classified as 'suburban' character	Proportion of Dwellings in 'Suburban' Typology
Barnet	57,716	11,171	19.4%
Brent	47,057	9,091	19.3%
Ealing	54,056	19,598	36.3%
Harrow	43,223	11,744	27.2%
Hillingdon	35,911	10,086	28.1%
Hounslow	33,850	10,781	31.8%

Table 9.3: Proportion of dwellings in the WLA Boroughs classified as falling within the suburban setting in the SHLAA character map

Borough	Terraced	Non-terraced	Total intensification	Rounded annual figures	10 year figures
Barnet	160	702	862	860	8,600
Brent	171	503	673	670	6,700
Ealing	224	348	572	570	5,700
Harrow	128	470	598	590	5,900
Hillingdon	108	367	476	470	4,700
Hounslow	124	252	376	370	3,700

Table 9.4: 'Modelled' Elements of the GLA SHLAA 2017 Small Sites Target Excluding Land defined as 'suburban' using the methodology to match Output Areas to the SHLAA Character Map

Borough	Terraced	Non-terraced	Total intensification	Rounded annual figures	10 year figures
Barnet	-20.5%	-21.1%	-21.0%	-21.1%	-21.1%
Brent	-19.5%	-20.3%	-20.1%	-20.2%	-20.2%
Ealing	-32.6%	-40.8%	-37.9%	-38.0%	-38.0%
Harrow	-24.2%	-29.2%	-28.2%	-28.9%	-28.9%
Hillingdon	-24.3%	-31.4%	-29.9%	-29.9%	-29.9%
Hounslow	-23.6%	-38.6%	-34.3%	-35.1%	-35.1%

Table 9.5: Percentage Difference between the Total 'Modelled' Elements of the GLA SHLAA 2017 Small Sites Target and the total excluding Output Areas defined as 'suburban'

9.15 Having identified this relationship and issue with the methodology we regard character as a potentially significant indicator of capacity for development. However, we conclude that the reasons for a greater proportion of 'suburban' character and other potential links to factors affecting development need to be better understood. This is also to ensure that potential impacts of draft Policy H2 that cannot easily be assigned to the SHLAA Character Map are not overlooked.

9.16 A key issue is to avoid generalising conclusions. A range of different correlating factors can work in the same way so that the overall result is a larger area within a relevant buffer being classified as suburban in character. Open space and large employment areas (or other non-residential uses) can have the same effect in reducing pedestrian catchments. The same outcome can also result from specific physical barriers e.g. rail lines and rivers.

9.17 Inevitably there is a link between features such as concentrations of areas with lower PTAL rating and suburban character. However, there appear to be few other stand-out indicators and little to signal a wider causal relationship and potential impact on development. For example, there is a positive link between the total area of designated open space within a relevant town centre buffer and proportion of 'suburban character' in all Outer London centres. This could be a specific constraint on capacity (due to proposed restrictions on the *presumption in favour of small housing developments* on designated open space) but this alone may not indicate wider impacts from intensification.

9.18 One slight difference in West London is a slightly higher average hectarage of designated employment land within relevant 800m town centre buffers compared to the rest of Outer London. 30 of 47 identified centres contain some designated employment land (LSIS or SIL) at an average of 16.1ha per centre. The proportion is only 42 of 78 centres in the rest of Outer London (averaging 12ha). This may partly relate to the historical pattern of development in West London and linear development of centres along key routes for transport and industry. However, there is a high degree of variation between centres and the impacts will vary from location to location – ranging potentially from detrimental impacts on demand for residential development, opportunities to balance jobs and homes or greater opportunities for re-use of employment land for significant housing growth. This will need to be explored through evidence of delivery and other potential indicators of policy impacts.

9.19 As part of continuing to explore a broad measure of local character alongside other indicators we have populated a dataset to illustrate the percentage of dwellings within relevant 800m buffers that match with the 'suburban' character type (Figure 9.1).

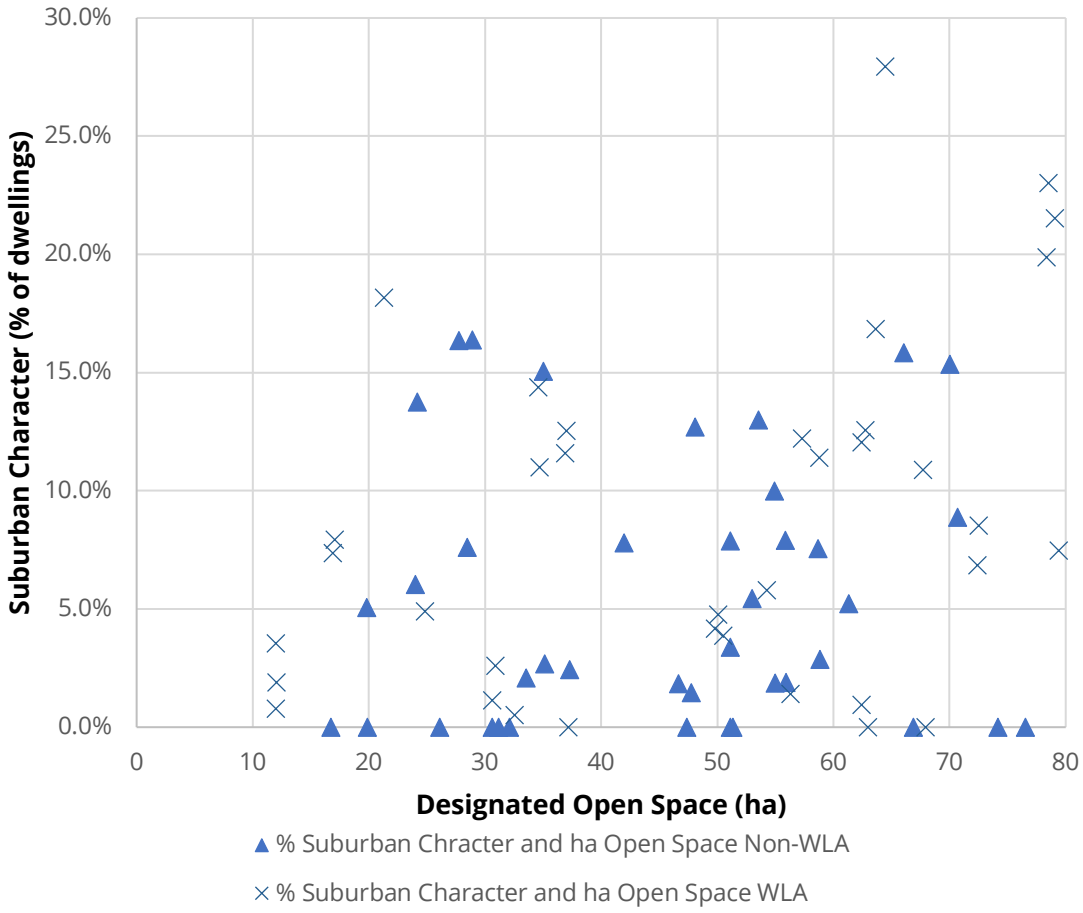

Figure 9.1: Relationship between the % of 800m Town Centre Buffers with areas 'Suburban' Character and total hectares of Designated Open Space within the 800m buffer

Demographic Relationship with Development Capacity and Use of Housing Stock

9.20 The purpose of this section is to broadly highlight the issue of differences in demographics across London and in-particular some key trends that can be identified as influencing the context in West London. These are not factors affecting development that have been considered by the GLA 2017 SHLAA methodology. This applies a standard approach to yield growth factors within existing stock which by extension means any differences in how housing stock is used and occupied do not influence the GLA's view on the potential capacity for development.

9.21 It is not the purpose of this assessment to relate any finding on differences with a detailed view of housing need in terms of housing mix, tenure or the needs of different groups. These can only be addressed by specific evidence on those topics. It is also the case that any relationship with overall trends in development activity will be multivariate and there are likely to be many indicators that influence capacity for development that we have not explored. These may ultimately affect individual developer or landowner choices, but analysis may reveal causes for overall changes in activity. Wider trends, such as increase in private rented tenure may relate to some of these specific demographic indicators as well as other factors but are likely to have an overall impact on the propensity for sites brought forward for redevelopment. Direct evidence from development and use of housing stock may provide a partial explanation for how stock is being used – for example the number of Homes in Multiple Occupation (HMOs). However, this data is likely to be incomplete and may not include all instances of housing occupied by a number of unrelated individuals.

9.22 We would suggest that beyond this initial identification of factors affecting capacity for development the potential for specific relationships with housing need do warrant closer investigation. This would more fully inform understanding of the potential *impacts* of draft Policy H2. In broad terms this would probably need to establish as yet unknown forecasts in terms of overall levels of delivery and specifically any implications in terms of meeting the needs of different tenures. This would particularly need to establish whether increased rates of development on small sites have an effect on the achievability of targets for affordable housing and the affordability of homes in general. The starting point recognises that a significant proportion of delivery on small sites would be below the threshold for contributions towards affordable housing.

9.23 Extensive research on housing need has sought to illustrate relationships between modelled supply and the impact on different groups as a result of the type, tenure and level of homes provided. Findings in 'Estimating Housing Need' (DCLG, 2010 pp.11) highlighted the *"types of need most sensitive to modelled changes in supply are concealed and sharing households, although there are also significant impacts on*

overcrowding, affordability and other problems." Given many of these trends are illustrated by the long-term issues with boosting housing land supply at the national level as well as in London it would be prudent to ensure that future effects are well understood in proposing alternative policy approaches. However, as we indicate these are matters that sit outside the assessment of capacity considered in this project.

9.24 The Greater London Authority uses a range of background data and secondary sources to contribute towards and illustrate the evidence base for the Mayor's Housing Strategy. The series of 'Housing Need in London' Reports (2011, 2014, 2015 and 2017) provide useful context to issues of demand and supply for housing and the specific drivers for household characteristics and pressures on housing need. The Reports illustrate the role of different tenures and the importance of ensuring the affordability of housing in framing key objectives for each Housing Strategy.

9.25 The Reports are significant in informing our assessment of key secondary sources of information for household characteristics in West London. Whilst the Reports refer to a large range of datasets the degree of spatially disaggregated reporting is limited in some instances. Moreover, we also seek to highlight whether, where potentially significant trends are identified, or can be discerned from further analysis, particular factors may directly affect the capacity for development on 'small sites'. This is specifically relevant to determining any recommendations on the need for changes to the 'small sites' targets recommended by the SHLAA, including geographic differentiation. The following topics have been identified for further consideration, each of which is discussed in turn below:

- Overcrowded Households ('Rooms' Standard)
- Concealed Households
- Multi-Generational Households

Overcrowded Households ('Rooms' Standard)

9.26 One measure of overcrowding looks at whether households have more than one person per room (including bedrooms, kitchens and living rooms, but not bathrooms, toilets, storage rooms, halls or landings) (as defined by the GLA, 2015).

9.27 In London, overcrowding has risen between 2001 and 2011 from 5.0% to 5.8%. This compares to an overcrowding level in the rest of England of 1.4% in 2001 to 1.5% in 2011. The rate of overcrowding in Inner London has remained at 6.7%, however rose in Outer London from 3.8% to 5.2%. between 2001 and 2011 (GLA, 2015, p. 93). This is illustrated in Figure 9.2, which shows how the rate of overcrowding in much of the West London wards has increased by 4% or more, far higher than other Outer London boroughs. The biggest increase in overcrowding over the decade was in Wembley Central in Brent, where 21% of households were overcrowded in 2011 compared to 14% in 2001 (GLA, 2015, p. 96).

9.28 The proportion of households with more than one person per room by ward in 2011 is illustrated in Figure 9.3. This shows that the West London Boroughs have a number of areas with a high proportion of overcrowded households. There is inevitably variation at Ward level and overcrowding is not an issue solely identified in west London. However, there are clearly differences between broad divisions of outer London, particularly for example those boroughs towards the south-east and south-west.

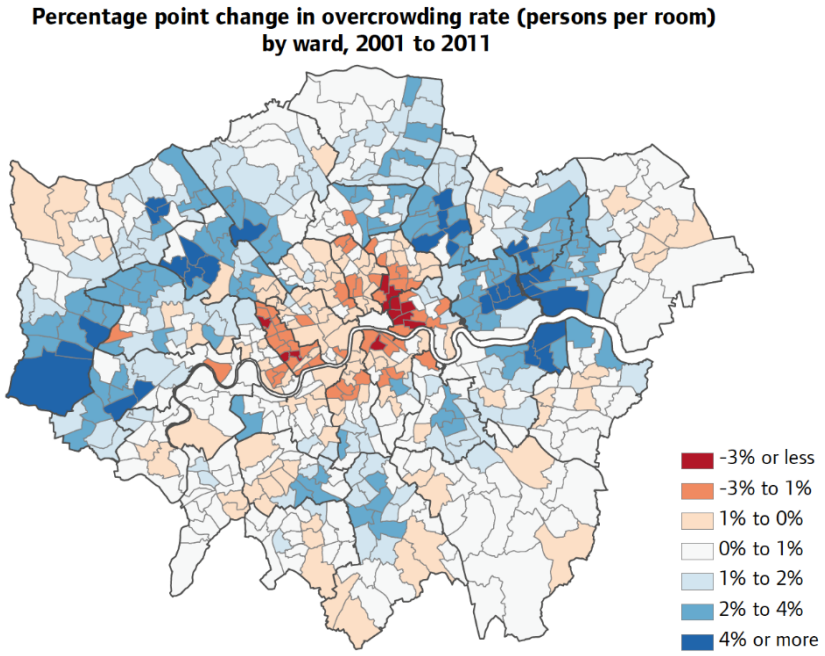

Figure 9.2: Change in overcrowding in London, 2001-2011 (Source: GLA, 2015)

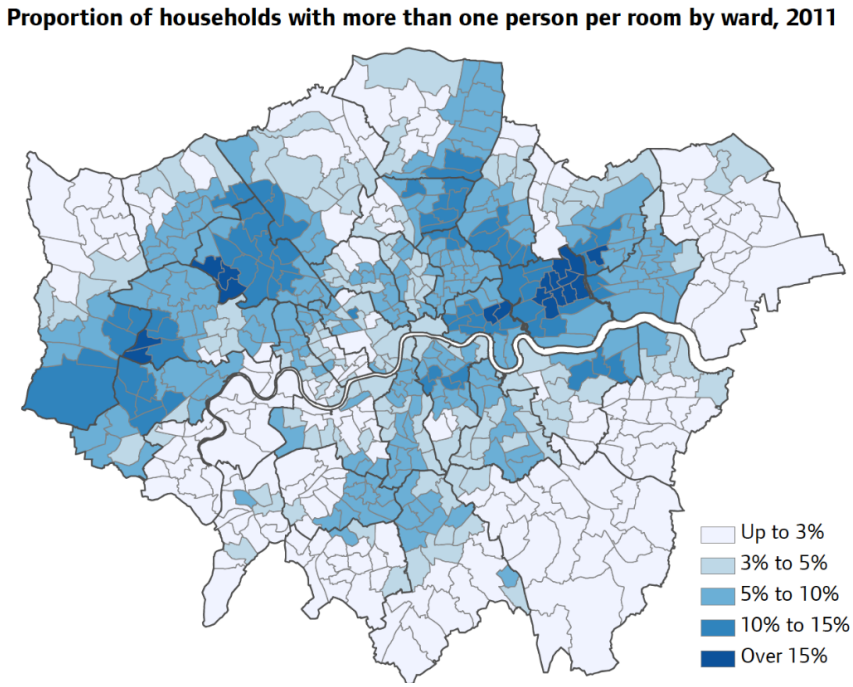

Figure 9.3: Proportion of households with more than one person per room, 2011 (Source: GLA, 2015)

‘Other’ Household Definition: Includes Concealed Families and ‘other’ types

9.29 Other households are defined as people who are not living in one family households, even though they may be related (e.g. siblings), or consist of two or more generations. Other households also include multi-generational households as well as unrelated people sharing (such as student or other house shares) (ONS, 2014b, p. 2). Other households saw the largest percentage increase (28.3%) in all household categories between 2001 and 2011 (ONS, 2013, p. 1).

9.30 Other households are also linked to cultural differences in familial ties between ethnic groups. This is evidenced by the fact that other households are almost twice as likely to have a Household Reference Person (HRP) (an individual person acting as a reference point to characterise a whole household) of non-white or mixed ethnic group compared to all households.

Multigenerational Households

9.31 Multigenerational families are included in the ‘other households’ category. Multigenerational families consist of: three generations of the same family living together or two adult families of the same generation living together. Concealed families differ from multigenerational households, as multigenerational households could include a single grandparent living within their child and a single grandchild, however this would not be included in the definition of a concealed household (Cambridge Centre for Housing and Planning Research, date, p. 6). A study by the Cambridge Centre for Housing and Planning Research (2017) estimated that approximately 6.8% of all UK households were multigenerational in 2013/14.

9.32 Using the Labour Force Survey, the ONS estimated that the number of three generational households in the UK increased from 2001 to 2011 by 23.4%. The greatest proportion of concealed households was found to occur in London (Cambridge Centre for Housing and Planning Research, 2017, p. 8).

9.33 The Cambridge Centre for Housing and Planning Research found that key drivers for multigenerational living were to do with providing care and companionship for older generations and also linked to issues related to the affordability of housing.

9.34 The Cambridge Centre for Housing and Planning Research also highlighted research strongly linking multigenerational households with being from an ethnic minority: 11% of non-white grandparents lived with their children, compared to 2% of white grandparents. They also highlighted that Indian, Bangladeshi and Chinese older people are more likely to be living in multigenerational households than white older people.

Concealed Households

9.35 Concealed households are defined as a family living within a multi-family household in addition to a primary family, such as a young couple living with parents (note family households contain one family only – multi-family households are included in 'other households') (GLA, 2015).

9.36 3.3% of households in London were recorded as concealed families in the 2011 Census. This is far higher than the incidence of concealed households in England and Wales as a whole, where concealed households represent 1.8% of all households (GLA, 2015)

9.37 Five of the top 20 local authorities with the greatest percentage of concealed families (2011 Census) are in West London (Brent, Ealing, Harrow, Hillingdon, Hounslow), with concealed household rates from 7% to 3.3% (ONS, 2014). The clustering of concealed households in London, in particular West London, is clearly illustrated in Figure 9.4.

9.38 Between 2001 and 2011 concealed families in England and Wales increased by 70% compared with a 6.6 percent increase in unconcealed families (ONS, 2014). In London the percentage of concealed households almost doubled between 2001 and 2011 (GLA, 2015).

9.39 The ONS (2014, p. 11) note that concealed household statistics are often used as an indicator for housing demand. However, they also acknowledge that concealed household proportions may relate to cultural differences in familial ties between ethnic groups. This is evidenced by the fact that the top 10 LAs with the highest proportions of concealed families (including Brent, Ealing and Harrow) also have the highest proportions of the population identifying with a non-white ethnic group (ONS, 2014, p. 11).

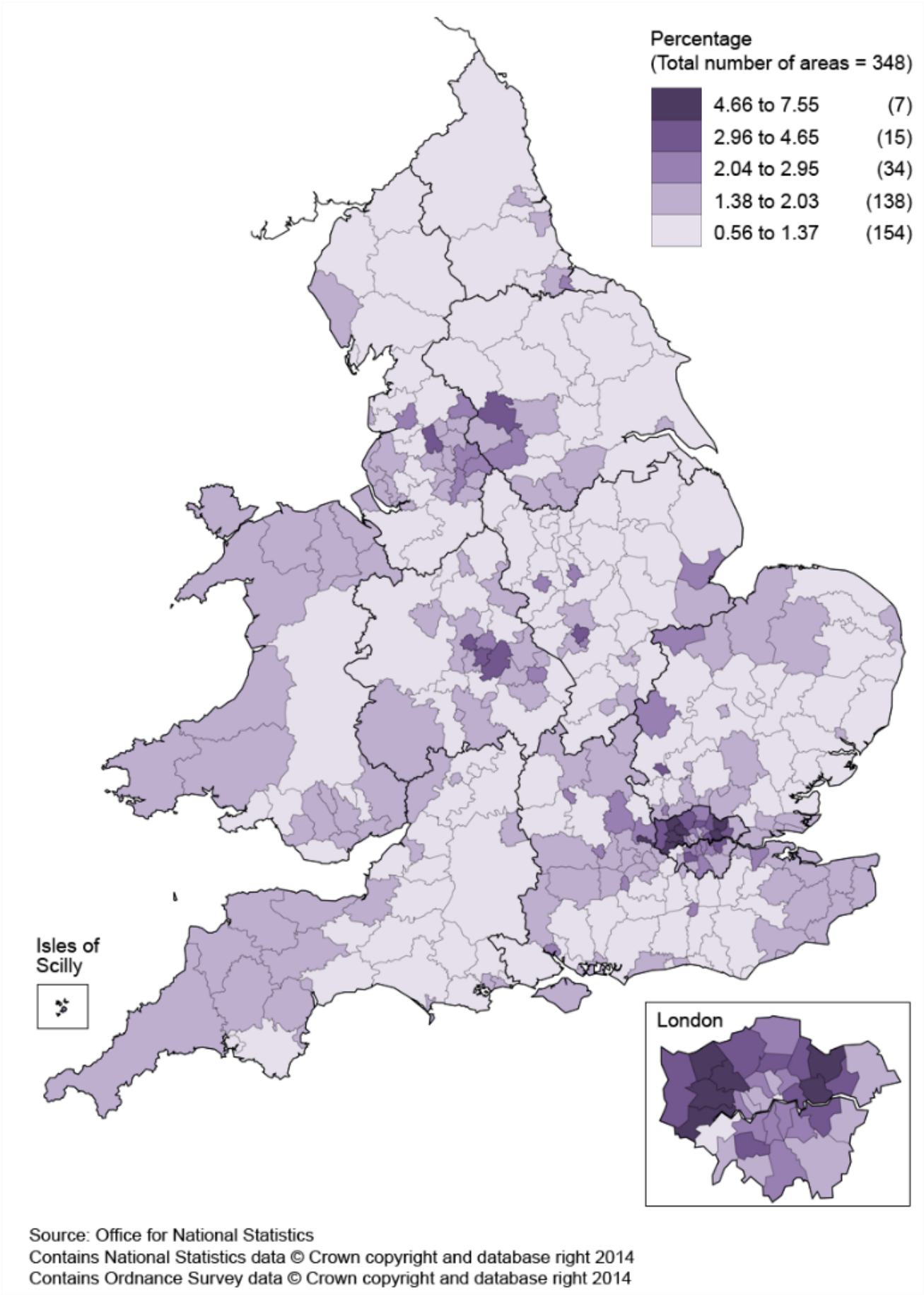

Figure 9.4: Concealed households in England and Wales (source: ONS, 2014)

Findings on Demographic and Household Factors and Potential Impacts for Draft Policy H2

9.40 We have set out the potential relevance of several main components of data on trends in demographic and household factors of most potential relevance to the West London context. This is not an exhaustive list; further analysis would likely find various multi-variate relationships between secondary data different geographies.

9.41 The implications for the 'small sites model' are likely to be most relevant where the indicators we have identified have a close relationship with the criteria for 'small sites' modelling. At this stage it is a matter of judgement whether these indicators would represent a given constraint on the capacity for development and whether this constraint could be attributed to relatively small-scale geographies or apply more widely at the borough level. Nonetheless, where data indicates a particularly strong representation of one of the Census attributes (e.g. concealed households or overcrowding) it could provide the basis for further analysis. Evidence from past trends in development could, for example, be used to corroborate whether levels of activity are markedly above or below wider averages.

9.42 2011 Census data is available at Output Area level for each of the three main Census topics we have discussed. This is very helpful because it allows analysis to be undertaken consistently with the inputs to the 'small sites' modelling assumptions or subsequent delivery.

9.43 Likewise, relevant Output Areas can be georeferenced in terms of their relationship to the overall geographic criteria for draft Policy H2 (i.e. within 800m of Town Centre or station boundaries) and can be specifically grouped by the buffer for a named station or centre they are captured by. As a result, it is relatively straightforward to calculate and identify any specific locations within the 'small sites' model that demonstrate a strong relationship with these secondary indicators (i.e. an above-average proportion of concealed families or overcrowded homes) and then consider further the potential relationship with capacity for development.

9.44 It should be noted that for the purposes of comparing with wider averages a consistent measure is required. This must take account of the fact that London as a whole typically observes trends in all relevant indicators that exceed wider national averages. The indicators also deal with relatively small numbers and proportions of the overall population, making use of simple percentages difficult and potentially unhelpful in comparing concentrations with the average.

9.45 The 'Location Quotient' (LQ) is a more effective measure of quantifying how concentrated a particular demographic factor is in a given area as compared to a larger reference region. For all calculations we use 'London' as the reference region to provide a consistent view across the capital. The LQ is calculated as follows. It uses

one particular sub-group or indicator of the population or households (X) as a proportion of total households or residents (Y) in the local area – (X)/(Y) gives a concentration of the specified sub-group in the local area. Data points for (X') and (Y') are available for the larger reference region (London) thanks to the consistent methodology for the Census. The LQ (or relative concentration) of the sub-group in the local area compared to the reference area is (X/Y) / (X'/Y').

9.46 Appendix 4 of this Report contains a series of maps illustrating the LQ of different Census indicators by individual Output Areas. For the purposes of supporting analysis we have also added the 800m buffer of relevant centres identified by the 'small sites model. It can be observed that there appear to be clusters of Output Areas that fall within relevant buffers and show a strong concentration of the relevant Census indicator (i.e. higher Location Quotients) compared to the reference area of London. Equally, there are some cluster with a significantly below average representation of (for example) concealed families or overcrowding.

9.47 There is a strong similarity between the maps. This is essentially a function of the Census methodology, particularly for identifying different classifications of households. As we have illustrated, some specific sub-groups (e.g. 'concealed families') are also reported as a component of a larger category (i.e. 'other households'). There may be additional factors that increase the overall concentration of other households (e.g. when an area also has a high incidence of young adults sharing housing) but the interrelationships between categories go some way to explaining the similarity.

9.48 In terms of establishing whether concentrations may be significant at smaller geographies it is helpful to confirm the overall relationship between the constituent boroughs (and West London overall) with other potential groupings and the position in London overall.

9.49 This is illustrated in the series of tables below (Table 9.6 - Table 9.8) that compare the overall position in the constituent West London boroughs with other groupings in London (i.e. all Inner or Outer boroughs and all boroughs not within the West London Alliance). The constituent boroughs overall show higher than average concentrations across all indicators. This is less pronounced for all 'Other' households and likely due to the lower representation in some sub-categories of this group (e.g. student households and households where all residents are aged 65+). Indicators are more marked for 'concealed' households and for levels of overcrowding compared to the London average.

Borough Grouping	All categories: Number of persons per room in household	Over 1.0 and up to 1.5 persons per room	Over 1.5 persons per room	LQ - London
Inner London	1362907	58597	31456	**1.13**
Outer London	1903266	69514	31214	**0.91**
All WLA Boroughs	730258	34133	16654	**1.19**
Non-WLA Boroughs	2535915	93978	46016	**0.95**
Constituent Boroughs: Breakdown				
LB Barnet	135,916	4,704	2,451	**0.90**
LB Brent	110,286	7,718	4,211	**1.85**
LB Ealing	124,082	6,724	3,131	**1.36**
LB Harrow	84,268	3,751	1,482	**1.06**
LB Hillingdon	100,214	3,831	1,484	**0.91**
LB Hounslow	94,902	4,844	2,119	**1.26**

Table 9.6: Total of Households with Over 1 person per Room and Location Quotient by Borough and Borough Grouping (Census Dataset: QS409EW - Persons per room – Households)

Borough Grouping	All categories: Household composition	Other household types	Other household types: With dependent children	LQ - London
Inner London	1362907	246680	57443	**1.21**
Outer London	1903266	242094	91600	**0.85**
All WLA Boroughs	730258	119522	41879	**1.09**
Non-WLA Boroughs	2535915	369252	107164	**0.97**
Constituent Boroughs: Breakdown				
LB Barnet	135,916	18,577	6,100	**0.91**
LB Brent	110,286	23,219	8,801	**1.41**
LB Ealing	124,082	21,852	7,833	**1.18**
LB Harrow	84,268	12,861	5,831	**1.02**
LB Hillingdon	100,214	12,179	5,130	**0.81**
LB Hounslow	94,902	15,272	5,805	**1.08**

Table 9.7: Total of 'Other' Household Types and Location Quotient by Borough and Borough Grouping (Census Dataset KS105UK - Household composition)

Borough Grouping	All categories: All families	Concealed family: Total	Concealed family: Lone parent family: Total	Concealed family: Couple family: Total	LQ - London
Inner London	749006	23134	8989	14145	**0.93**
Outer London	1315257	45466	13478	31988	**1.04**
All WLA Boroughs	500507	23042	5794	17248	**1.39**
Non-WLA Boroughs	1563756	45558	16673	28885	**0.88**
Constituent Boroughs: Breakdown					
LB Barnet	92,793	2,876	732	2,144	**0.93**
LB Brent	76,695	5,356	1,269	4,087	**2.10**
LB Ealing	84,800	4,546	1,119	3,427	**1.61**
LB Harrow	65,184	3,324	724	2,600	**1.53**
LB Hillingdon	73,204	2,567	723	1,844	**1.06**
LB Hounslow	66,799	3,377	876	2,501	**1.52**

Table 9.8: Total of Concealed Families and Location Quotient by Borough and Borough Grouping (Census Dataset LC1110EW - Concealed family status by family type by dependent children by age of Family Reference Person (FRP))

Borough Grouping	All categories: Tenure	Private rented: Total	LQ - London
Inner London	1362907	406982	**1.19**
Outer London	1903266	412103	**0.86**
All WLA Boroughs	730258	186443	**1.02**
Non-WLA Boroughs	2535915	632642	**0.99**
Constituent Boroughs: Breakdown			
LB Barnet	135,916	34,854	**1.02**
LB Brent	110,286	33,181	**1.20**
LB Ealing	124,082	34,182	**1.10**
LB Harrow	84,268	18,324	**0.87**
LB Hillingdon	100,214	18,141	**0.72**
LB Hounslow	94,902	22,206	**0.93**

Table 9.9: Total of Private Rented Dwellings and Location Quotient by Borough and Borough Grouping (Census Dataset: QS405EW

9.50 We also compare the private rented tenure in the constituent boroughs with the London average (Table 9.9). Here the position in West London does not overall differ significantly from the wider average. This masks that, for this indicator, there is a higher concentration of private renting within Inner London and typically lower than average levels in Outer boroughs. It should also be noted that with the exception of LB Hillingdon (LQ 0.72) all the constituent boroughs in Outer London display higher concentrations of private renting (LQs of 0.87 – 1.20) compared to the overall average in Outer London (0.86) suggesting that tenure is a potential variable alongside patterns of demographic and household composition.

Geographic Concentrations of Household and Demographic Factors

9.51 The next stage considered by this report is to identify where above average concentrations of potential indicators affecting development capacity closely align with inputs to the 'small sites' modelling assumptions. We have focused detailed analysis in terms of household composition on the 'concealed families' indicator: this appears to have the strongest overall concentration and potential relationship to specific household and demographic patterns in West London. However, as the maps of various Census indicators show there is likely to be an interrelationship with this indicator and others that may affect development.

Relationship with Concealed Households

9.52 Those Town Centres within the constituent boroughs (i.e. where one of the seven WLA members is listed in the location) where 5% or more of all families are recorded as 'concealed' by the 2011 Census are shown in Table 9.10. By extension this means for all identified centres the LQ exceeds 1.5 times the London average, but can be above 4.0.

9.53 These locations represent significant concentrations of concealed families, typically exceeding levels observed in the individual borough as a whole by almost double. It would be reasonable to anticipate some impact on the use and availability of dwelling stock in such specific circumstances.

9.54 It is the purpose of this section to also consider these indicators as potentially interrelated with other factors. It is arguable that the circumstances around any given centre will be unique in terms of how they might affect development outcomes or inform potential policy options. However, there is some indication of a correlation between areas observing higher concentrations of concealed households and other measures of development and built environment characteristics. For concealed households we have focused on two potential correlations with the LQ data.

9.55 Firstly, those areas with a higher concentration tend to demonstrate a greater proportion of the relevant 800m Town Centre buffer defined as 'suburban' according to the SHLAA Character Map (Figure 9.5). Secondly, there appears to be a link between the proportion of concealed households within a relevant 800m buffer and the percentage of that land area taken up with adopted or emerging development plan allocations (Figure 9.6).

Borough	Centre Name	% Concealed Families	LQ (Comparing London Average)	Borough(s) Average LQ
Brent	Ealing Road	13.3%	4.01	**2.10**
Ealing	Southall	11.8%	3.54	**1.61**
Brent	Wembley	11.3%	3.41	**2.10**
Brent/Harrow	Kingsbury	8.8%	2.64	**2.1 / 1.53**
Brent	Preston Road	8.4%	2.54	**2.10**
Brent	Wembley Park	7.8%	2.36	**2.10**
Harrow/Brent	Kenton	7.4%	2.21	**2.1 / 1.53**
Hounslow	Hounslow	7.3%	2.21	**1.52**
Barnet/Brent/Harrow	Burnt Oak	7.0%	2.11	**0.93 / 2.1 / 1.53**
Brent	Neasden	6.8%	2.04	**2.10**
Hillingdon	Hayes	6.6%	1.99	**1.06**
Barnet/Brent	Colindale/ The Hyde	6.5%	1.96	**0.93 / 2.10**
Ealing	Greenford	6.3%	1.88	**1.61**
Harrow	Wealdstone	5.6%	1.67	**1.53**
Barnet	Hendon Central	5.5%	1.66	**0.93**
Brent	Willesden Green	5.0%	1.65	**2.10**

Table 9.10: Town Centres with the Greatest Concentration of Concealed Families

9.56 These two correlations need not be interdependent; one may affect certain centres with higher concentrations of concealed families (e.g. more suburban character) without any high level of allocations being recorded. Equally, closer analysis of individual case studies may reveal spatial and socio-economic reasons for both correlations in a single area: a realistic example would be an area with a high degree of land identified for regeneration that may presently be redundant, interfere with walking routes and thus for the purpose of the SHLAA character map dictate a faster change to suburban character.

9.57 It Is reasonable to assume that the housing stock where any such correlation and concentration of concealed households exists must be relatively suitable for the household type (i.e. in terms of size and adaptability). In the example we give above factors such as better affordability may also be relevant, though this would need further analyses.

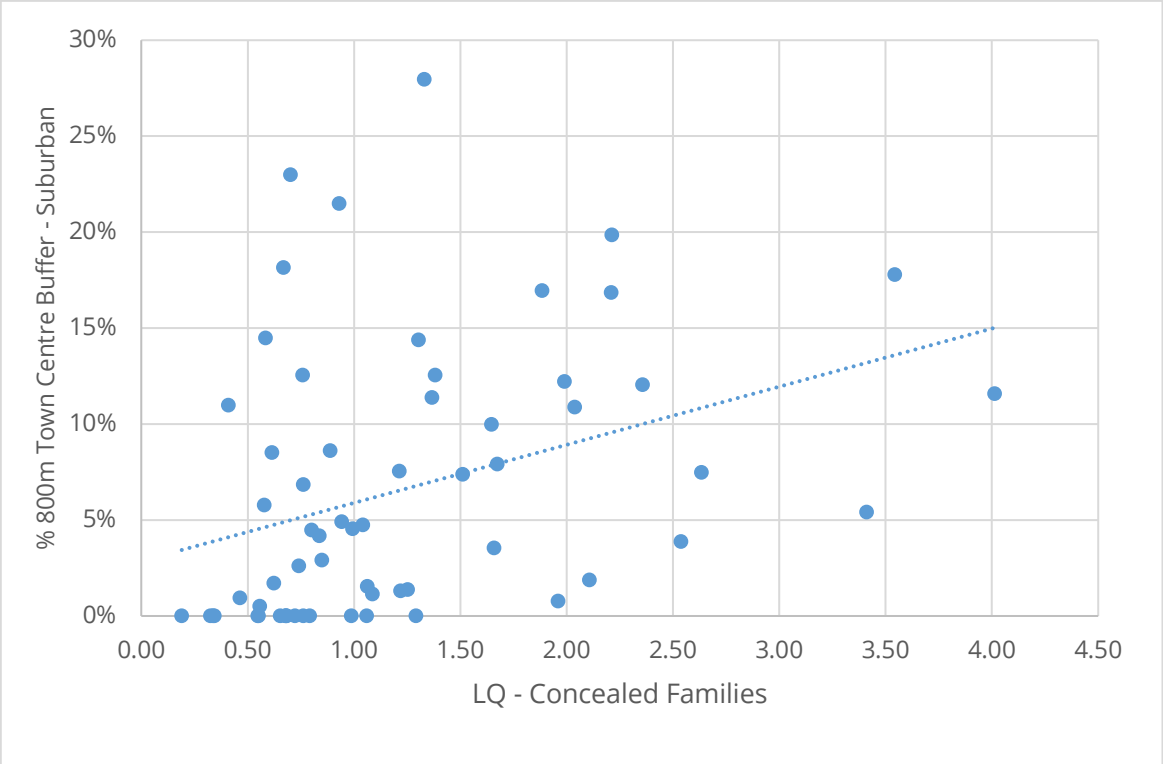

Figure 9.5:Relationship Between the LQ of Concealed Families within 800m Town Centre Buffers by % of 800m defined as 'suburban character'

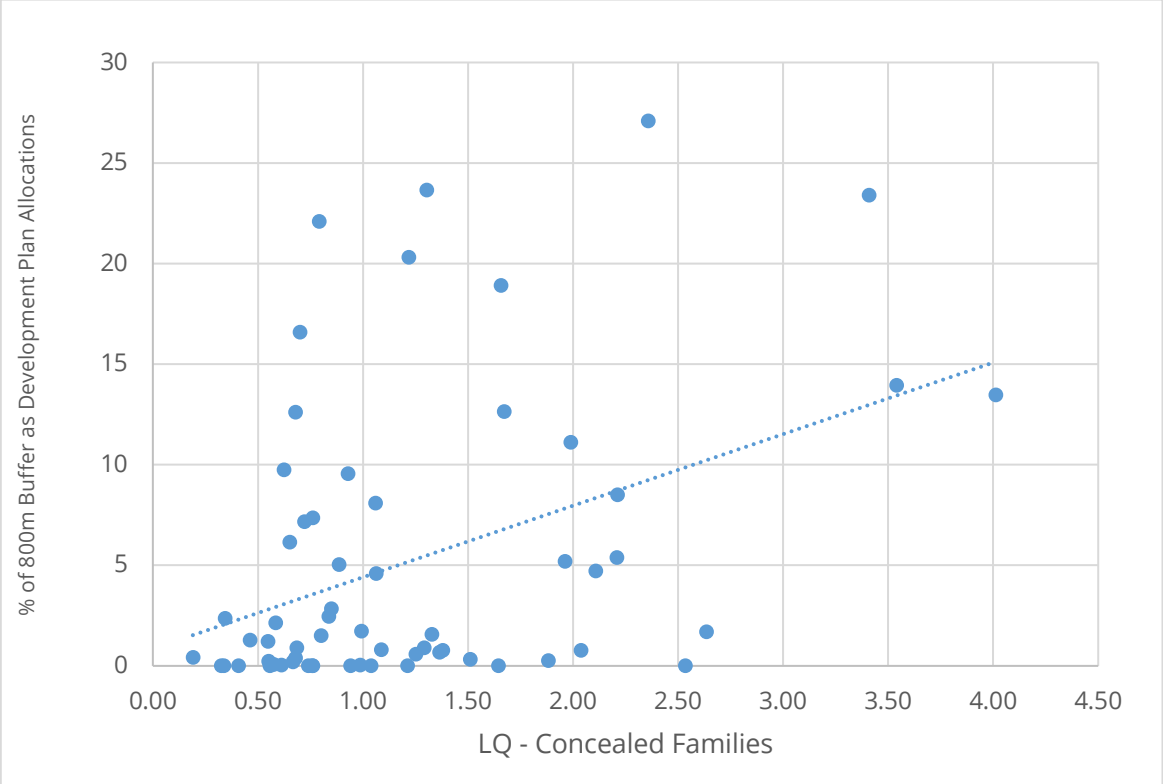

Figure 9.6: Relationship Between the LQ of Concealed Families within 800m Town Centre Buffers by % of 800m containing adopted or emerging Local Plan allocations

Trends in Tenure

9.58 We have also undertaken more detailed spatial analysis of concentrations in terms of private rented tenure. This indicator provides a weaker signal in terms of high concentrations compared to London-wide averages but it must be noted that the constituent boroughs in Outer London do have lower than average levels of households across other tenures than the overall position in Outer London.

9.59 Where greater concentrations exist, they may potentially have stronger linkages with other indicators (particularly 'other' household groups (including multi-adult households and students) and a greater likelihood of overcrowding. There may also be other pressures on housing stock associated with housing tenure that could impact on the capacity for development including (for example) lower levels of car ownership and greater use of public transport. Such factors may relate positively with the objectives of draft Policy H2 in seeking sustainable development but be countered by high demand for existing use of housing and choice of tenure(s).

9.60 The table below (Table 9.11) sets out named centre with a LQ of 1.30 and above compared to the average concentration across London. This represents a minimum proportion of at least 33% of properties in private rented tenure; a relatively significant departure from the 25% average in West London overall (and noting the higher percentage in LB Hammersmith and Fulham within this average).

9.61 Behind these concentrations at the top end of the range there exists a number of relatively strong correlations with other indicators of potential impacts on the capacity for development and scope for different outcomes of development. As suggested by the introduction, concentrations of private rented tenure appear closely related to higher levels of public transport accessibility (Figure 9.7) and areas with a greater proportion of 'urban' or 'central' character as defined by the SHLAA Character Map (Figure 9.8). These two indicators could well be interdependent in terms of higher density centres offering a more suitable mix of housing stock popular amongst private rented tenures as well as greater concentrations of services and transport connections.

9.62 Alongside issues of tenure, these factors may work together to limit the number of properties potentially appropriate for delivering a further net yield of dwellings as part of intensification (i.e. subdivision or demolition and replacement).

9.63 The potential constraints on the availability of stock to be brought forward as part of intensification may be significant and warrants further analysis through delivery trends. Models of suburban intensification such as 'Supurbia – 'semi-permissive' are predicated on one or more private property owners seeking to realise additional value through development. This assumption may be less compatible where existing demand for private rented tenures is higher.

Borough	Centre Name	% Private Rented	LQ (Comparing London Average)	Borough(s) Average LQ
Barnet	Golders Green	41%	1.63	**1.02**
Barnet/Brent/Camden	Cricklewood	40%	1.61	**1.02 / 1.20**
Brent	Willesden Green	40%	1.58	**1.20**
Barnet	Hendon Central	37%	1.49	**1.02**
Harrow	Harrow	36%	1.43	**0.87**
Barnet	Brent Street	35%	1.41	**1.02**
Ealing	Ealing	35%	1.4	**1.10**
Barnet	Temple Fortune	35%	1.39	**1.02**
Barnet	Church End, Finchley	35%	1.38	**1.02**
Brent	Neasden	33%	1.33	**1.20**
Hounslow	Hounslow	33%	1.32	**0.93**

Table 9.11: Town Centres with the Greatest Concentration of Private Rented Tenure

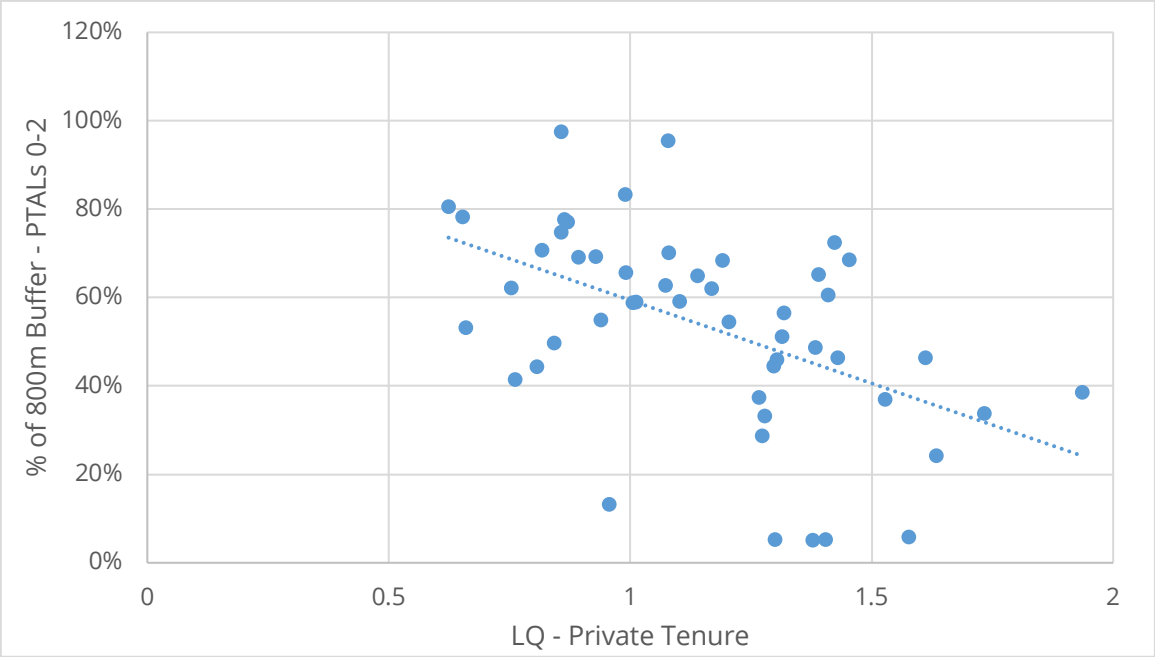

Figure 9.7: LQ of Private Rented Tenure by % of 800m Town Centre Buffer with PTALs 0-2

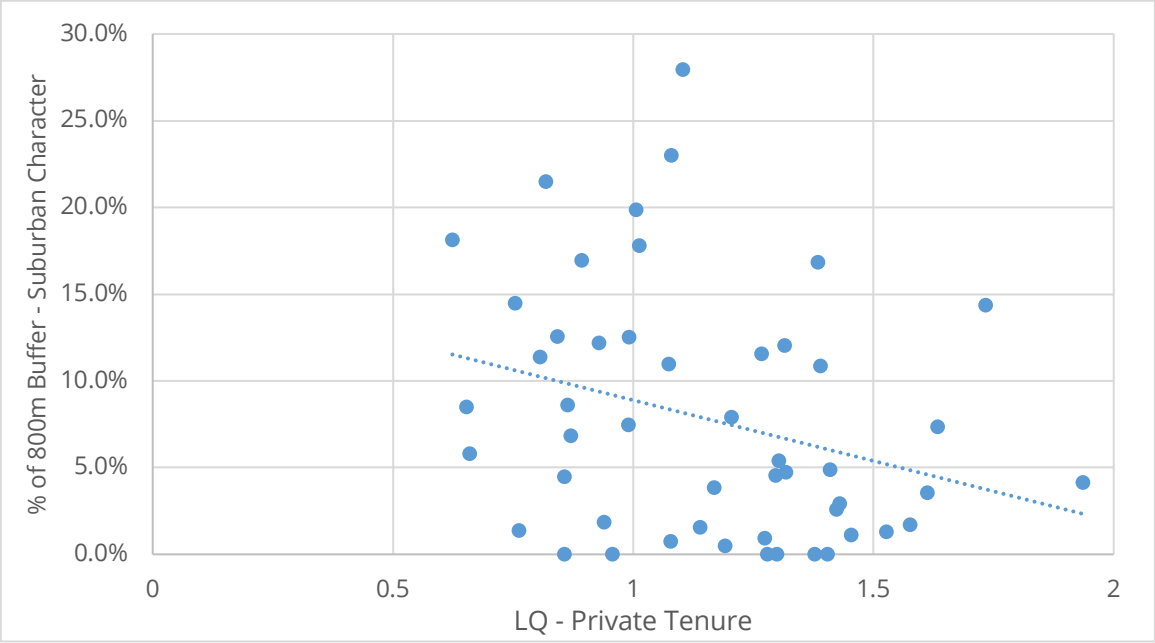

Figure 9.8: LQ of Private Rented Tenure by % of 800m Town Centre Buffer within Suburban Character

9.64 Of further potential importance is an understanding of links between existing planning policy and areas with a higher concentration of private rented tenure (Figure 9.9). There is a strong indication these areas correlate with a higher proportion of land within relevant town centre 800m buffers that is identified as existing or emerging development plan allocations. The nature of this link could be multifaceted: it is likely to relate at least in-part to local demand for development but may be part of a more complex range of measures including support for regeneration and investment in infrastructure improvement.

9.65 This suggests that, alongside potentially stronger indicators for sustainable development outcomes, planning policy for large sites already has a significant role in boosting housing delivery. As well as potential resulting physical limits on capacity (i.e. the characteristics of existing dwellings and other sites are less consistent with activity on 'small sites') evaluation might also be needed on the relative merits and impacts of supporting incremental intensification alongside comprehensive allocations for development.

Figure 9.9: Concentration of Private Rented Tenure and % of 800m Town Centre Buffer designated as Local Plan Allocations

The Impact of PTAL Ratings and Connectivity Indicators for Small Site Modelling Assumptions

Introduction and the Starting Point to Differentiate Impacts

9.66 The starting point for this analysis is relatively straightforward and relates to concerns raised in representations by the West London Alliance and other Outer London boroughs. In brief, this recognises that PTAL is a relatively narrow measure of the quality of public transport access and use of other sustainable transport modes (such as walking and cycling). Furthermore, the 'small sites' modelling assumptions apply an 800m circular radius around all stations, irrespective of the overall makeup of PTAL ratings amongst constituent Output Areas. This could have the double effect of overlooking other measures of connectivity and failing to give weight to a very high proportion of lower PTAL ratings so that inclusion within the modelling assumptions purely relates to geography rather than quality of access (even as measured by PTAL).

9.67 As a starting point we have mapped all Output Areas falling inside relevant 800m station buffers by their PTAL rating. These are included in Appendix 6. Those within PTALs 3-6 (i.e. relevant as a standalone reason to include an Output Area within the 'small site modelling assumptions) are shown as shaded; PTALs 0-2 are hatched. It is evident that there are some stations, especially those away from the town centre hierarchy, where none of the relevant station buffer contains areas of PTAL3+.

9.68 In other locations smaller concentrations of PTALs 3+ may provide some indication of the local physical geography and form of the built environment – for example higher PTALs ratings found along linear road corridors of major routes or concentrated very closely around a station itself. Change to lower PTAL ratings may occur for a variety of reasons related to the quality of rail or tube service, availability of buses or other physical features in the built environment: such as where a large Output Area (in terms of spatial area) has a low PTAL rating it is conceivable this could be physically separated from public transport access by elements such as open space or rail lines.

9.69 Higher concentrations of PTALs 0-2 could in its own right be a reason to remove either the Output Areas or relevant buffer from modelling assumptions. However, we proceed to identify whether other indicators or potential factors affecting the capacity or impact of development can be correlated with the initial pattern.

Wider Measures of Connectivity

9.70 We have indicated through the literature review that the GLA SHLAA Methodology ignores wider measures of connectivity in terms of identifying areas potentially suitable for intensification as inputs to the 'small site' modelling assumptions. Evidence presented by TfL identifies differences in travel patterns and transport modes using secondary data such as travel demand surveys.

9.71 Understanding the more nuanced measure of connectivity would indicate that there may be potential risks with the GLA's application of equal weight to the criteria for locations within either PTALs 3+ or 800m of a station or town centre in determining whether the *presumption in favour of small housing development applies*. Whilst only one of these qualifying criteria needs to be met for the *presumption* to be applied, measures of connectivity would indicate a relationship between the factors. This is particularly significant in terms of the implications for supporting increased rates of development in areas of poor public transport accessibility (but otherwise within relevant 800m buffers). In these instances, physical effects such as barriers to accessing the town centre on foot or the prevailing low density of housing may act as strong incentives on use of the private car.

9.72 Census data on Travel to Work Patterns captures a lower proportion of movements but can be grouped down to Output Area Level. We have assessed the proportion of all trips by private transport modes (driver or passenger of a car or motorcycle/moped). This reveals substantial variation between the West London Boroughs, though on average access to work by private transport modes exceeds London-wide and Outer-London averages. However, it is the variation within individual boroughs by PTAL rating which may be more illustrative. This effect exists largely independently on whether Output Areas lie within 800m of station and town centre boundaries; although this does not discount that the overall trend might be shaped by the characteristics around individual stations. For example, relatively small areas of poor accessibility around a station might not depart from trends in the local area; whereas the whole area of housing within the buffer for a less accessible station might experience much higher private car use.

9.73 We set out LB Hounslow as an example below (Table 9.12). For areas with higher PTALs and captured by relevant buffers for stations and town centres travel to work using private transport is closer to the London average (22.2% compared to 20.2%). Where PTAL ratings are lower average rates of private transport use exceed 30% irrespective of relationship to 800m buffers. In context, these rates vary between 1.5 and 1.75 times the London average suggesting significant pressure on travel patterns.

LB Hounslow	All Travel to Work Movements	Movements by Private Mode	Proportion of Travel by Private Mode	Location Quotient
Hounslow	190157	55207	29.0%	**1.44**
Within 800m of station or town centre	125731	33060	26.3%	**1.30**
PTAL 0-2	60422	18530	30.7%	**1.52**
PTAL 3+	65309	14530	22.2%	**1.10**
Outside 800m of station or town centre	64426	22147	34.4%	**1.70**
PTAL 0-2	62952	21632	34.4%	**1.70**
PTAL 3+	1474	515	34.9%	**1.73**

Table 9.12: LQ of Travel to Work by Private Modes for Output Areas in LB Hounslow by PTAL Rating and Proximity to 800m Station and Town Centre buffers (Census 2011)

9.74 More detailed analysis requires the assessment of individual centres. This takes account of the fact that whilst comparison of PTAL rating and other connectivity measures may show differences down to very small Output Area geographies, in practice we know that certain centres or station boundaries have much higher concentrations of low PTAL ratings.

9.75 Relevant stations have been identified where they exceed at least 30% of Travel to Work using private modes. This is at least 5% more than the wider West London average and equates to a LQ of 1.5 or above with the remainder of London. We have specified the relevant borough where each station is located as well as it's LQ compared to London to account for differences between the constituent boroughs (Table 9.13).

Station Borough	Station Type	Station Name	% Private Movements	LQ Private Modes	Borough LQ
Hillingdon	Underground Station	Hillingdon	44%	**2.2**	**1.83**
Hillingdon	Underground Station	Ickenham	42%	**2.08**	**1.83**
Hillingdon	Underground Station	West Ruislip	41%	**2.02**	**1.83**
Hillingdon	Railway Station	West Ruislip	40%	**2**	**1.83**
Hillingdon	Underground Station	Ruislip Gardens	39%	**1.95**	**1.83**
Hillingdon	Underground Station	Ruislip Manor	39%	**1.91**	**1.83**
Hillingdon	Underground Station	Ruislip	38%	**1.87**	**1.83**
Hillingdon	Railway Station	South Ruislip	37%	**1.81**	**1.83**
Hillingdon	Underground Station	Eastcote	36%	**1.8**	**1.83**
Hillingdon	Underground Station	South Ruislip	36%	**1.79**	**1.83**
Hillingdon	Railway Station	West Drayton	36%	**1.78**	**1.83**
Harrow	Railway Station	Hatch End	36%	**1.76**	**1.46**
Hillingdon	Underground Station	Northwood Hills	34%	**1.67**	**1.83**
Barnet	Railway Station	Oakleigh Park	32%	**1.6**	**1.30**
Barnet	Railway Station	New Barnet	32%	**1.59**	**1.30**
Hounslow	Railway Station	Feltham	32%	**1.58**	**1.44**
Hillingdon	Underground Station	Uxbridge	31%	**1.54**	**1.83**
Harrow	Railway Station	Headstone Lane	31%	**1.52**	**1.46**
Hillingdon	Underground Station	Northwood	31%	**1.52**	**1.83**
Hillingdon	Underground Station	Hatton Cross	30%	**1.51**	**1.83**
Harrow	Underground Station	Stanmore	30%	**1.5**	**1.46**
Ealing	Railway Station	Northolt Park	30%	**1.48**	**1.17**
Hounslow	Railway Station	Isleworth	30%	**1.48**	**1.44**
Hillingdon	Railway Station	Hayes & Harlington	30%	**1.48**	**1.83**
Barnet	Underground Station	High Barnet	30%	**1.47**	**1.30**
Hounslow	Railway Station	Syon Lane	30%	**1.46**	**1.44**

Table 9.13: 800m Station Buffers with the highest LQ of Travel to Work by Private Modes

9.76 A high degree of concentration can be observed, particularly in LB Hillingdon, where travel patterns exceed the borough average despite the availability of a relevant station within 800m; noting already that the LB Hillingdon average is almost twice the typical use of private Travel to Work methods in London. Outside of this range of the most significant examples, a strong overall correlation is observed between the % of Output Areas with a PTAL Rating of 0-2 and preference for use of private travel modes. This is illustrated in Figure 9.10.

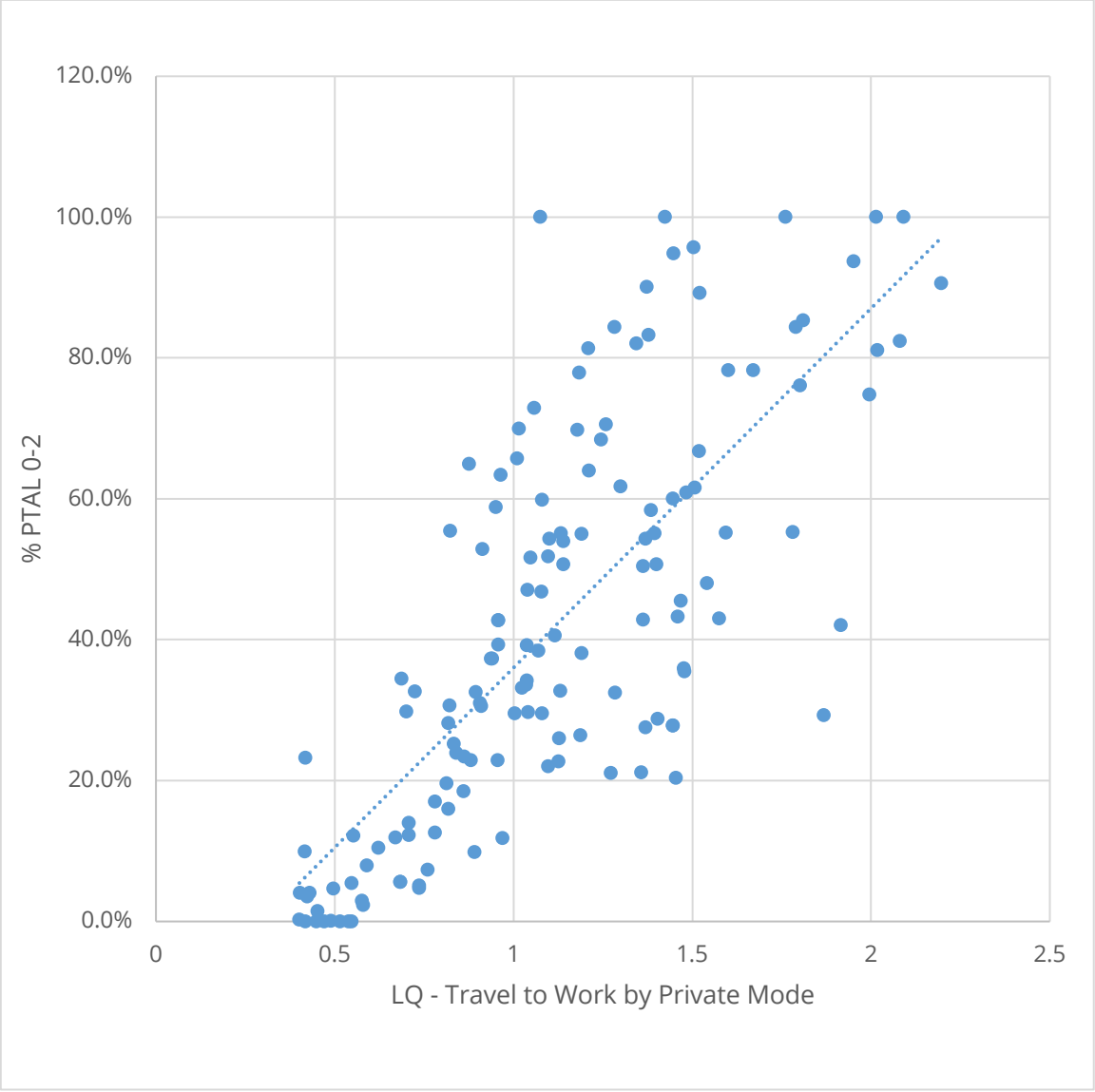

Figure 9.10: LQ of proportion of Travel to Work by Private Modes and % of PTALs 0-2 within 800m Station Buffers

9.77 A similar, albeit slightly less pronounced, trend can be observed noting the relationship between 'suburban' character (as defined by the SHLAA Character Map) and use of private transport modes (Figure 9.11). This provides some further basis for taking account of measures of local character as part of the 'small site' modelling assumptions.

Figure 9.11: LQ of proportion of Travel to Work by Private Modes and % 800m Station Buffers within 'suburban' character areas

9.78 A more comprehensive view on connectivity and the use of this as an indicator of the opportunities and capacity for sustainable development can be provided be looking at the same measures of travel modes by relevant buffers within the town centre hierarchy. This offers a slightly different view because not all centres will be served by stations. This alone might necessitate travel to work by private modes, irrespective of the proximity to a nearby centre (which may have limited employment prospects). Based on how the SHLAA Character Map operates all centres will have a relatively high proportion of 'Urban' or 'Central' character, but the reasons for a higher proportion of suburban character may differ, e.g. disruption to pedestrian walking catchments or difference in how quickly dwelling stock changes to lower density land use patterns away from the town centre boundary itself. It is nonetheless equally possible to also map PTAL ratings within town centre boundaries; where these show a greater concentration of limited public transport access other provision (e.g. frequency and access to bus stops) will also be lower and may correspond to the area's local character.

9.79 The Travel to Work Census data employed can only be viewed as a proxy. It would be helpful to employ more datasets to indicate the use of sustainable transport methods for other day-to-day needs which in-turn might relate to how closely the nearest local centre(s) are relied upon for these. However, there are limitations on data availability at Output Area level.

Centre Borough	Town Centre Name	% Suburban Character	% PTAL 0-2	% Private Movements	LQ Private Modes	Borough LQ
Hillingdon	Ruislip	5.8%	53%	40%	**1.97**	**1.83**
Hillingdon	Yiewsley/ West Drayton	8.6%	78%	37%	**1.83**	**1.83**
Hillingdon	Eastcote	18.1%	81%	36%	**1.79**	**1.83**
Hounslow	Feltham High Street	21.5%	71%	35%	**1.75**	**1.44**
Hillingdon	Uxbridge	23.0%	70%	33%	**1.65**	**1.83**
Barnet	New Barnet	11.0%	63%	33%	**1.64**	**1.30**
Harrow	Stanmore	4.5%	97%	32%	**1.59**	**1.46**
Hillingdon	Northwood	0.0%	75%	32%	**1.58**	**1.83**
Hillingdon	Hayes	12.2%	69%	32%	**1.56**	**1.83**
Ealing	Greenford	17.0%	69%	31%	**1.51**	**1.17**
Harrow	Pinner	8.5%	78%	31%	**1.51**	**1.46**
Barnet	Mill Hill	12.6%	50%	30%	**1.49**	**1.30**
Harrow	North Harrow	1.4%	41%	30%	**1.48**	**1.46**
Barnet	Chipping Barnet	14.5%	62%	30%	**1.48**	**1.30**

Table 9.14: 800m Station Buffers with the highest LQ of Travel to Work by Private Modes

9.80 Illustrating the centres where Travel to Work through private modes exceeds 30% provides a more varied picture of locations across the constituent boroughs with higher concentrations. These examples are set in Table 9.14.

9.81 Outside of these examples at the top of the range in terms of concentration of private travel modes there is a strong positive correlation between linkages to suburban character and the proportion of PTALs 0-2 within an 800m buffer that may impact on travel demands. This illustrates that there are clearly a number of centres that potentially exhibit a positive relationship in terms of lower concentrations of sustainable transport modes but that they form one end of a varied range. At the other end are locations which may indicate some consistency with the assumptions for increased rates of delivery on small sites (e.g. suggesting a change from more suburban character; more likely to comprise a range of existing larger residential properties or large gardens with scope for infill development) but where other policy impacts may need to be accounted for. In-particular, further evaluation may be required in terms of the ability of local centres to support more local employment opportunities (and provision of other day-to-day needs) and further assessment of whether incremental levels of development on 'small sites' will realistically alter existing travel behaviours.

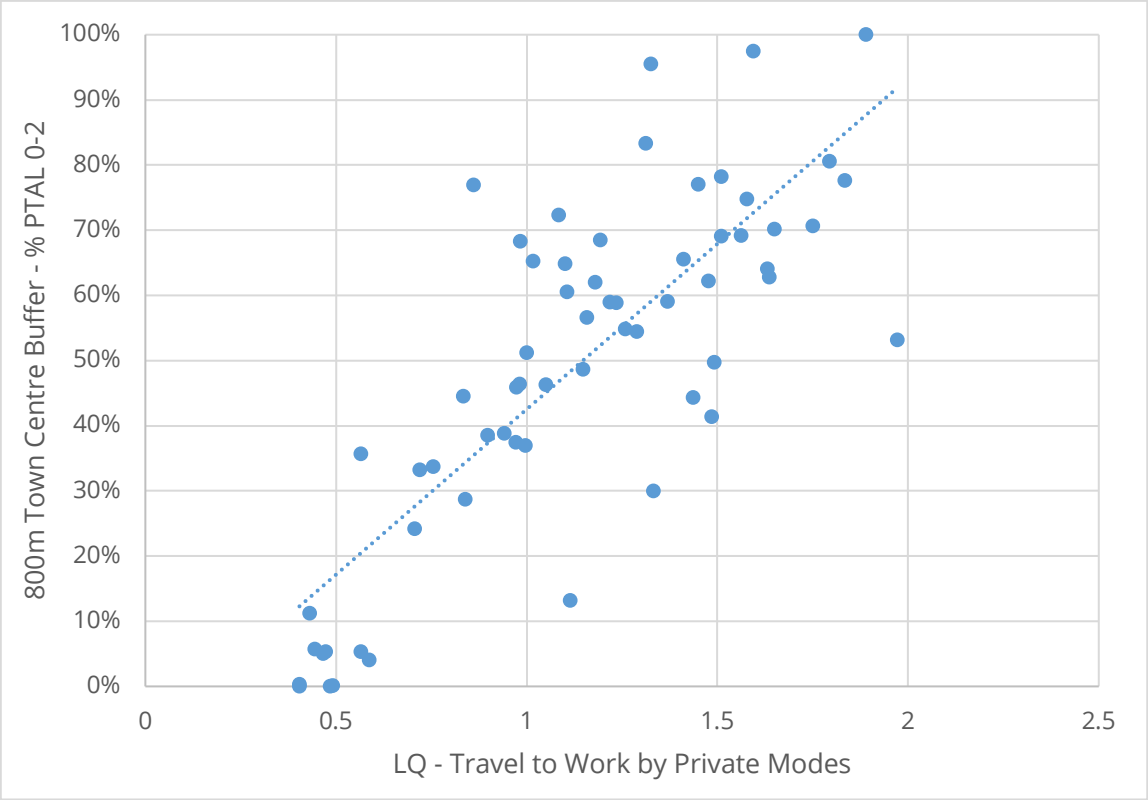

Figure 9.12: LQ of proportion of Travel to Work by Private Modes and % of PTALs 0-2 within 800m Town Centre Buffers

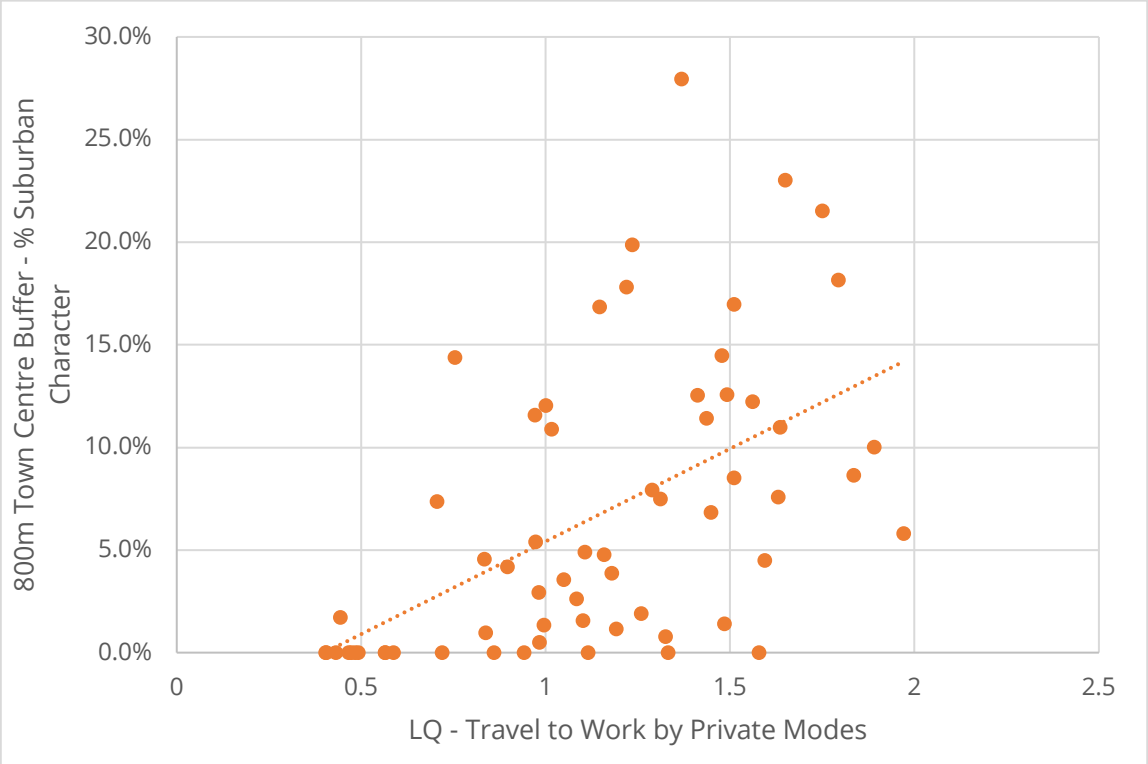

Figure 9.13: LQ of proportion of Travel to Work by Private Modes and % 800m Town Centre Buffers within 'suburban' character areas

9.82 We have also identified a small, albeit weaker, correlation between the proportion of relevant Town Centre buffers identified as designated Open Space and the concentration of private transport modes (Figure 9.14). This may not be a separate causal relationship; it is possible that higher levels of open space primarily relate to distance from Central London; although this land use indicator could also lead to increased walking distances and more limited access to public transport. There may be instances where the degree of open space, as a measure of local character, applies greater constraints to increasing sustainable travel patterns.

Figure 9.14: LQ of proportion of Travel to Work by Private Modes and ha of Designated Open Space 800m Town Centre Buffers within 'suburban' character areas

Link to Part B Report

9.83 The work presented in this Critique comprises very much a technical document containing the full detail of policies, guidance and considerations for the assessments of small sites we have been able to explore. These are summarised in the associated 'Non-Technical Summary'.

9.84 The Part A Critique identifies a number of significant concerns in terms of the GLA SHLAA methodology to calculate targets for 'small sites': issues and adjustments to any of which could lead to amendments to the numerical target for 'small sites', even following the 'modelled' approach as a proxy.

9.85 In short, The Part A Critique confirms that the GLA's approach for the 'modelled' capacity for development on small sites based on the 1% annual change in the proportion of existing dwelling stock is not clearly justified: the target represents a measure of supply but not delivery. This forms the starting point to base further concerns raised through examining past delivery.

9.86 These findings substantiate and reinforce a number of the WLA's concerns. These are further developed in the Part B report and, together with the findings in that, conclude that the GLA's modelled approach to generate targets for 'small sites' is neither a robust nor realistic measure of the capacity for development. The GLA methodology clearly overlooks a range of factors relevant to the assessment of development on unidentified sites, both in terms of considering the suitability and development outcomes from the proposed approach to boost supply, and the achievability of targets themselves.

9.87 It is our view that a much wider assessment could have been used to explore and compare alternative policy options. This is considered further in the Part B report.

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