



A report by Andrew Boff AM

# SOS: Save Our Suburbs

Protecting, enhancing and strengthening London's suburbs is not just important in itself – it is crucial to meeting London's chronic housing need, and to meet or exceed London's housing target of 64,935 homes per year. Developments which respect suburban character, design, building heights, its need for family-sized homes, and ensure sufficient infrastructure and parking spaces, are more likely to be supported and therefore be successful. Ultimately, what is good for London's suburbs is good for London.

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### EXECUTIVE SUMMARY

London has often been described as a ‘city of villages’. This is especially the case with London’s suburbs, each of which have their own distinct local character that is essential to the lifeblood of our city.

Protecting, enhancing and strengthening London’s suburbs is not just important in itself – it is crucial to meeting London’s chronic housing need, and to meet or exceed London’s housing target of 64,935 homes per year. Developments which respect suburban character, design, building heights, its need for family-sized homes, and ensure sufficient infrastructure and parking spaces, are more likely to be

supported and therefore be successful. Ultimately, what is good for London’s suburbs is good for London.

However, the Mayor’s planning and housing policies, in particular his draft new London Plan, present significant challenges and threats to London’s suburban character. His ‘small sites’ policy and targets would mean the loss of existing family homes and garden land. The removal of density limits increases the risk of overdevelopment and excessively tall buildings. His removal of family homes targets, and requirements for smaller units, will make such homes unaffordable and inaccessible for many ordinary families. In addition, the restrictions on parking



spaces in new developments, and the requirement for many of these to be car-free, will overwhelm local infrastructure and undermine support for new housing development.

This report therefore makes the following recommendations to ensure that London's suburbs can be properly supported and defended, but also fulfil their housing and development potential to London.

**Recommendation 1:**  
The Mayor should amend Policy H2 of his new London Plan to remove residential conversions, redevelopments and outbuildings from the definition of a 'small site', and should revise or abolish his small sites targets in accordance with local needs and capacity.

**Recommendation 2:**  
The Mayor should restore the existing protection for back gardens, as set out in Policy 3.5 of the current London Plan, into his new London Plan.

**Recommendation 3:**  
The Mayor should revise Policy E4 of his new London Plan to relax the 'no net loss' restriction on Strategic Industrial Land, replacing it with a policy that encourages boroughs to bring forward protections for industrial land in their Local Plans where this can be locally justified.

**Recommendation 4:**  
The Mayor should restore the density matrix to his new London Plan, to ensure that new developments can be set at an appropriate level for their context and surroundings.

**Recommendation 5:**  
The Mayor should set specific Supplementary Planning Guidance for outer London to support suburban character and design, including the use of design codes where appropriate.

**Recommendation 6:**  
The London Plan should be amended to specify, by default, that any building above 6 storeys in outer London should be regarded as a tall building unless the local authority sets a higher level, and that proposals for tall buildings should only be considered as part of an overall masterplan.

**Recommendation 7:**  
Investment targets for affordable family-sized homes should be restored in the Mayor's London Housing Strategy.

**Recommendation 8:**  
The Mayor should revise Policy H12 of the new London Plan to allow boroughs to set targets for family-sized homes for all tenures, in response to local need.

**Recommendation 9:**  
The Strategic Housing Market Assessment (SHMA) should

**be significant amended, and its methodology revised, to reflect the ongoing need for family-sized homes within different areas of London, particularly suburban areas.**

**Recommendation 10:  
The Mayor's new London Plan should be amended to devolve outer London parking standards to boroughs, and support boroughs who wish to set minimum parking standards.**

**Recommendation 11:  
The Mayor should review the impact of office to residential permitted development, particularly in suburban clusters, high streets and district centres, with a view to recommending exemptions for specific areas.**

## INTRODUCTION

London's suburbs are part of the special and diverse nature of Greater London. Whilst London is often associated with its familiar central London areas, the suburban areas of outer London add a distinct character that is essential to the lifeblood of the city.

Understanding, respecting and strengthening this suburban character is also key to the success of many of London's priorities, such as housing, transport and the local economy. In particular, as noted by *Create Streets*<sup>1</sup>, gaining local support for new development is crucial to ensuring that much-needed new homes can be built across London. Building new homes that respect this local character is therefore not only desirable in itself, it is essential to meeting London's chronic housing need, and ensuring that London's housing target of 64,935 homes per year<sup>2</sup> can be met and exceeded.

This report focuses on the important housing and planning aspects of London's suburbs and how these can and should be reflected in planning and housing policies. The development

needs of outer London will often be very different, especially in terms of character, design, size mix and infrastructure.<sup>3</sup> It is important to recognise this in order for development to be successful, rather than a 'one size fits all' approach to inner and outer London.

However, the Mayor's proposed new London Plan, published for consultation in 2017 and due for publication in 2020<sup>4</sup>, as well as his London Housing Strategy, published in May 2018<sup>5</sup>, represent a threat to London's suburbs in many of these important policy areas. This report therefore sets out proposals for how these issues can be remedied, and how to strengthen London's planning and housing policies to meet the needs of outer London.

In describing the suburbs, this report follows the traditional London Plan definition of outer London, comprising the nineteen London boroughs of Barking and Dagenham, Barnet, Bexley, Brent, Bromley, Croydon, Ealing, Enfield, Haringey, Harrow, Havering, Hillingdon, Hounslow, Kingston, Merton, Redbridge, Richmond, Sutton, and Waltham Forest.<sup>6</sup>

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<sup>1</sup> <http://dev.createstreets.com/wp-content/uploads/2018/04/Nimby-to-Yimby-280418.pdf>

<sup>2</sup> [Draft New London Plan](#), GLA, 2017, p146

<sup>3</sup> <https://www.londoncouncils.gov.uk/note/5960>

<sup>4</sup> [Draft New London Plan](#), GLA, 2017

<sup>5</sup> [London Housing Strategy](#), GLA, 2018

<sup>6</sup> [Draft New London Plan](#), GLA, 2017, pp499-500

## CHARACTER AND DESIGN

London has often been described as a city of villages<sup>7</sup>, each with distinct areas of local character. This is especially the case in the suburbs of outer London. New housing development is more likely to be supported, and therefore approved, if it reflects and enhances this local character.

There are a number of different elements to this, including design, height and green space. Suburban areas are typified by homes with traditional designs, low to mid rise buildings, and family houses with back gardens.

The Mayor's new draft London Plan presents a significant threat to this suburban character in a number of ways. Policy H2 of the Plan<sup>8</sup> includes a presumption in favour of development of up to twenty-five units on 'small sites'. Included in this definition, within 800m of a town centre boundary, are residential conversions, redevelopment of existing buildings, and outbuildings. The Plan also imposes targets on London boroughs for this type of development – of almost 25,000 homes a year across London<sup>9</sup> – apparently in an arbitrary way without

assessing local capacity. These measures put existing family homes directly at risk of being redeveloped into smaller flats, with no restriction on height or on the loss of garden land.

At the same time, the Plan removes protections that were previously in place to safeguard back garden land from development. Since 2011, Policy 3.5<sup>10</sup> of the London Plan has allowed boroughs to protect back gardens from development by enabling them to introduce a presumption against back garden development in their local plans. The support given in the London Plan enabled boroughs to give this sufficient weighting in their planning decisions. Before that time, the London Wildlife Trust estimated that 500 gardens, or parts of gardens, were being lost a year due to housing development. This was equivalent to 6 hectares a year, with the average development losing 200 sqm of garden land.<sup>11</sup> However, this protection is no longer included within the new London Plan.

In addition to this, Policy E4 of the new London Plan restricts the supply of brownfield industrial land

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<sup>7</sup> For example: <http://www.lse.ac.uk/business-and-consultancy/consulting/assets/documents/New-London-Villages-Final-Report.pdf>  
<sup>8</sup> [Draft New London Plan](#), GLA, 2017, pp152-154

<sup>9</sup> [Draft New London Plan](#), GLA, 2017, p156  
<sup>10</sup> [London Plan](#), GLA, 2016, pp102-103

<sup>11</sup> <http://www.wildlifetrusts.org/news/2011/06/17/new-report-reveals-scale-london%E2%80%99s-garden-loss>

that can be used for new homes, through a blanket policy of ‘no net loss’ of Strategic Industrial Land<sup>12</sup>. Whilst of course industrial land should be treated carefully and sensitively, such an arbitrary restriction of available land inevitably leads to pressures elsewhere, particularly on green space and garden land. The Plan therefore represents a decisive shift away from the traditional focus on development of brownfield land, towards development on green space. This would clearly be to the detriment of the character and quality of life in suburban areas.

An example of this is Meridian Water in Enfield, a key development site with the potential for 10,000 new homes<sup>13</sup>, including a GLA-supported Housing Zone with capacity for 3,675 homes<sup>14</sup>. A significant proportion of the site is designated as Strategic Industrial Land and would be affected by the ‘no net loss’ policy, putting the development of this site at risk. Enfield would also be required under the new London Plan to increase its supply of Strategic Industrial Land<sup>15</sup>, further limiting its land supply for new homes. Following this, Enfield Council is now looking to

review its Green Belt boundaries in its new draft Local Plan<sup>16</sup>, in order to find more land to meet its housing targets, with a significant risk that new homes could be built on Green Belt land.

Finally, the new London Plan removes limits on density in new development, previously known as the ‘density matrix’<sup>17</sup>, designed to ensure that developments were appropriate for their location and local public transport accessibility levels (PTAL). This weakens the ability of local communities to resist overdevelopment and puts pressure on boroughs to approve denser and taller developments, presenting a further threat to the character of many suburban areas.

In order to empower local councils and communities to protect local suburban character, and ensure housing development can be delivered in a reasonable and sustainable way, these London Plan proposals will need significant revision. The ‘small sites’ policy should be revised to focus on genuinely disused small sites, rather than family homes. Small site targets, if they are to be retained, should be significantly revised to reflect

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<sup>12</sup> [Draft New London Plan](#), GLA, 2017, p233

<sup>13</sup> <https://www.meridianwater.co.uk>

<sup>14</sup> <https://www.london.gov.uk/what-we-do/housing-and-land/increasing-housing-supply/housing-zones#acc-i-42734>

<sup>15</sup> [Draft New London Plan](#), GLA, 2017, p237

<sup>16</sup> [Draft Enfield Local Plan for public consultation](#), Enfield Council, 2018, p165

<sup>17</sup> [London Plan](#), GLA, 2016, p101

genuine local capacity and ideally made contingent on agreement with boroughs. Meanwhile, back garden protections from previous London Plans should be retained.

On Strategic Industrial Land, the blanket 'no net loss' restriction on its development for housing should be relaxed. A better way to proceed would be to leave this matter to the discretion of individual boroughs through their planning policies, according to the local needs of the area. In a similar way to the existing protections for garden land, local authorities could be empowered to protect industrial land where this can be locally justified. Proceeding in this way would still offer the ability to protect key industrial sites in local areas, but would also ensure that potential housing sites were not being artificially restricted, and avoid the need to turn instead to green space or garden land for new housing provision, especially in suburban areas.

Similarly, the ability to protect suburban areas from overdevelopment should be restored in the new London Plan, by reinstating density limits through the density matrix.

There is also an opportunity to ensure that suburban character and design can be strengthened and embedded across London's planning system, by setting specific guidance in the form of a Supplementary Planning Guidance document. This could provide a much-needed source of evidence and support to local communities in defending the character of different suburban areas. It could also support the use of design codes to help guide developers towards more traditional forms of architecture where appropriate.

## HEIGHT

Buildings heights is an issue that particularly affects outer London compared to other areas. In many suburban areas, with the exception of specific clusters, heights are typically much lower than elsewhere, usually two or three storeys, with a much smaller threshold for a building to be considered tall. Local residents will often prefer to see low or mid-rise street-based developments, with taller buildings meeting much greater resistance, and this needs to be supported and encouraged in planning policy<sup>18</sup>.

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<https://policyexchange.org.uk/publication/create-streets/>



However, it is becoming increasingly difficult for local planning authorities to resist tall buildings, even in areas that had previously been considered low or mid-rise. An example of this is the nineteen-storey Palmerston Road development in Harrow, which had been opposed by the borough's planning committee and the local community, but was subsequently called-in and approved by the Mayor in March 2017<sup>19</sup>. The borough's Local Plan had originally set a limit of six storeys on this site<sup>20</sup>.

Once a tall building is approved in an area it can often set a damaging precedent, not only in planning policy but also in the impact it has on the price of local land<sup>21</sup>, which will typically see an uplift on the expectation that neighbouring sites can also be built to the same height. If developers subsequently purchase the land on that basis, their financial incentive will be skewed towards a taller development in order to make the scheme economically viable, thus creating a chain reaction.

These increasing pressures on building heights, often driven by the need for higher densities as mentioned earlier, present a threat to the character of many

suburban areas. There is a need to urgently reset this balance to protect this important characteristic of London's suburbs, and to strengthen the hands of local councils in doing so. This could be done through two important changes to the London Plan.

First by specifying that, by default, any building in outer London above six storeys should be considered a tall building, unless a borough specifically sets a different level in their local plan.

Secondly, the London Plan should stipulate that tall buildings can only be considered if they are part of a masterplan. This would ensure that tall buildings are not considered in isolated, unplanned way, but as part of an overall and comprehensive plan where the local community will have had the opportunity to comment.

## **FAMILY HOMES**

The traditional and suburban character of many areas of outer London lends itself particularly well to family homes. Indeed, family-sized homes, of at least three or four bedrooms, have consistently formed a significant part of the

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<sup>19</sup> <https://www.london.gov.uk/what-we-do/planning/planning-applications-and-decisions/public-hearings/palmerston-road>

<sup>20</sup> [Harrow and Wealdstone Area Action Plan](#), Harrow Council, 2013, p80

<sup>21</sup> <https://voxeu.org/article/tall-buildings-and-land-values>

housing needs of many outer London boroughs, and are likely to do so for many years to come.

By default, the planning system tends to be skewed towards smaller units of one and two bedrooms. The new London Plan sets a minimum target of 64,935 homes to be built across London every year<sup>22</sup>. Clearly, without further intervention, it would be easier and cheaper for developers to meet such targets with smaller units, regardless of local need. Therefore, it is important to ensure that housing and planning policies also make provision for family-sized homes, with appropriate targets, incentives and other requirements.

However, the Mayor's Housing Strategy and new London Plan lead in the completely opposite direction, with a lack of support for family-sized homes and an encouragement of smaller units. The London Housing Strategy determines how the Mayor will allocate London's affordable housing funds, which currently includes £4.82 billion provided by the government<sup>23</sup>. Previous London Housing Strategies, published in 2010 and 2014, have set targets for a minimum number of affordable family homes

funded by GLA, of 42 per cent<sup>24</sup> and 36 per cent<sup>25</sup> respectively. However, for the first time ever, the latest Housing Strategy, published in May 2018, does not include any such target. This means that there is no incentive for public housing funds to be invested in family-sized homes, nor for developers to deliver them.

Within the new London Plan, in policy H12 on Size Mix<sup>26</sup>, boroughs will even be prohibited from setting their own family homes targets for market and intermediate homes in their own local plans. Whilst boroughs would still be able to set their own planning targets for affordable rented family homes, such targets are unlikely to be in place before the new London Plan is finalised. In any case, as such targets would not have an impact on how GLA housing funds are allocated, they would not be an adequate substitute for investment targets in the London Housing Strategy.

A significant problem lies with the Strategic Housing Market Assessment (SHMA), a background document that is published with the new London Plan and forms part of its evidence base. This document calculates a 'need' for 55% of all new homes to be one-bedroom units.

<sup>22</sup> [Draft New London Plan](#), GLA, 2017, p146

<sup>23</sup> [London Housing Strategy](#), GLA, 2018, p209

<sup>24</sup> [London Housing Strategy](#), GLA 2010, p16

<sup>25</sup> [London Housing Strategy](#), GLA, 2014, p29

<sup>26</sup> [Draft New London Plan](#), GLA, 2017, p178

Within low-cost rented housing, it says that 21,318 homes a year should be one-bedroom units, out of a total of 30,972, which is 69% of the total. It claims just 4,343 low-cost rented homes a year should be three or four-bedroom units, or 14% of the total<sup>27</sup>.

These figures appear to be based on flawed assumptions that large numbers of adult children should move out of the family home and into one-bed social rented units. This would be a very poor use of housing resources as well as a wasted opportunity. In fact, the London Assembly's 'Crowded Houses' report from 2011 found that building a single family home could solve the problems of several households at the same time, due to the 'churn' effect of freeing up other homes further down the line.<sup>28</sup>

Suffice to say, the cumulative impact of these policies and documents would lead to a dramatic reduction in family-sized homes and a plethora of one and two-bedroom units. This would be particularly problematic for suburban character, especially in conjunction with the loss of existing family homes through the 'small sites' policy mentioned earlier. It would also fail to

meet London's wider housing needs, and risks exacerbating the problem of overcrowding, with the latest figures showing that 360,000 children in London live in overcrowded homes<sup>29</sup>. Restricting the supply of family-sized homes in this way will ultimately make them less affordable and obtainable for ordinary families across London and particularly in the suburban areas, creating a vicious circle of demand and supply, when in fact we should be doing the opposite.

Resolving these issues, and protecting and enhancing the delivery of family homes in the suburbs and across London, requires a number of significant changes to the Mayor's housing and planning policies. Targets for family-sized homes should be reinstated in the London Housing Strategy. Boroughs should be empowered to set size mix targets for all tenures, including market and intermediate homes.

The SHMA should also be significantly revised to reflect the ongoing need for new family homes across London, and particularly in suburban areas. This is essential if London boroughs are to have the necessary support to require larger family-sized homes where appropriate,

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<sup>27</sup> [London Strategic Housing Market Assessment](#), GLA, 2017, p6

<sup>28</sup> <https://www.london.gov.uk/about-us/london-assembly/london-assembly-publications/crowded-houses>

<sup>29</sup> <https://files.datapress.com/london/dataset/housing-london/2017-01-26T18:50:00/Housing-in-London-2017-report.pdf>

and to protect existing family homes.

## **PARKING AND INFRASTRUCTURE**

One of the main concerns about new development is whether there will be sufficient infrastructure to support it. This includes roads, school places and health services, but also suitable levels of parking provision. Suburban areas will often be less well served by public transport, especially for local journeys, and will typically have a greater need for car ownership. Whilst residents may or may not need to use their cars every day, depending on how they commute to work, they are more likely to retain a car for certain journeys.

Public support for new developments can often hinge on the number of off-street parking spaces provided, with lack of parking a key objection. A reasonable level of parking provision can therefore support new housing development and help it be successful. Conversely, the experience and impact of developments with insufficient parking can make local residents suspicious and ambivalent about further new development in their area,

harming the ability to develop much-needed new homes<sup>30</sup>.

Similarly, a sufficient level of parking on local high streets, district centres and town centres can often be an important factor in the success of the local economy, especially those that need to compete with out-of-town shopping centres. Potential customers will often look for places where they can find suitable parking, particularly in areas that are not as well served by public transport.

The London Plan has, for many years, set limits on the maximum number of parking spaces that can be provided in new developments, known as parking standards, depending on factors such as location, unit size, floorspace and public transport accessibility level (PTAL). More recent versions of the London Plan, such as the current Plan published in 2016<sup>31</sup>, had introduced some welcome flexibility, such as the recognition that parking standards can be overridden in certain circumstances.

However, the Mayor's proposed new London Plan reverses this trend towards flexibility and dramatically tightens these restrictions. In particular, Policy T6 of the Plan introduces a

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<sup>30</sup> [Residential Parking Guidance Note](#), Chartered Institution of Highways and Transportation

<sup>31</sup> [London Plan](#), GLA, 2016



requirement for many types of development to be 'car free' – in other words, with no off-street parking except for disabled spaces. Other types of residential and commercial developments are expected to be 'car lite' and minimise parking<sup>32</sup>.

This blanket approach will not be suitable for many areas, including those in outer London. Removing car parking spaces will not necessarily reduce car ownership or car usage. More likely, residents will still own cars but will park them elsewhere, leading to parking overspill and a greater level of congestion and inconvenience for others. The way to achieve modal shift is to provide better options than car usage, not try to restrict parking supply for people that do not have adequate alternatives<sup>33</sup>.

By contrast, providing more flexibility on parking standards, including the ability to set minimum targets, would help boroughs to ensure that new development can be better supported. It would help the take-up of electric vehicles by giving more people the opportunity to have their own charging point at home. Providing more parking

spaces would also provide more opportunities for car clubs and other car sharing initiatives. In these ways, it would therefore help to support the overall housing and transport objectives of the whole of London.

Related to this issue are longstanding concerns about the impact of office to residential conversions on local suburban areas, particularly on local infrastructure. Since May 2013 it has been possible to change the use of offices to a residential use without needing planning permission. Instead, this can follow a lighter-touch prior approval system, where only a small number of issues can be considered, such as highways and flooding impacts<sup>34</sup>.

However, with no control over the quality of the homes provided, nor any provision to mitigate its impact on local infrastructure, such developments can often have a detrimental effect, as noted recently by the Royal Institute of Chartered Surveyors and University College London<sup>35</sup>.

Whilst some central London areas have had exemptions to this policy for many years<sup>36</sup>, to protect against

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<sup>32</sup> [Draft New London Plan](#), GLA, 2017, pp420-421

<sup>33</sup> [Does car ownership increase car use?](#), Berkeley Group, 2011

<sup>34</sup> <https://www.london.gov.uk/what-we-do/planning/who-we-work/working-government/permitted-development-rights-changes-use>

<sup>35</sup>

<https://www.ucl.ac.uk/news/2018/may/office-residential-developments-providing-poor-quality-housing>

<sup>36</sup>

<https://www.gov.uk/government/publications/areas-exempt-from-office-to-residential-conversions>

specific economic impacts, exemptions for other areas should be considered. This should especially be the case in many suburban areas, where large numbers of offices have traditionally been concentrated due to more affordable rents.

## **CONCLUSION AND RECOMMENDATIONS**

As set out in this report, the Mayor's current housing and planning policies represent a significant threat to London's suburbs, and therefore to wider development goals in London. In order for outer London to be protected and thrive, there are many changes that need to be made.

The following recommendations would help to defend the special character of many suburban areas in London. They would also present an important opportunity to improve the contribution of the suburbs to London's housing and development needs in a sustainable manner. Ultimately, what is good for the suburbs is good for London.

**Recommendation 1:**  
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**definition of a 'small site', and should revise or abolish his small sites targets in accordance with local needs and capacity.**

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The London Plan should be amended to specify, by

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[residential-change-of-use-permitted-development-right-2013](#)

**default, that any building above 6 storeys in outer London should be regarded as a tall building unless the local authority sets a higher level, and that proposals for tall buildings should only be considered as part of an overall masterplan.**

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