

# SMALL SITES – JUST HOW VALUABLE ARE THEY

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London has a housing shortage, which most of us are acutely aware of. In the new iterations of the "big" policy documents rolled out recently, an emphasis on small sites is much to be enthusiastic about. As far as background goes, the number of small house builders (less than 100 homes) operating within London has dropped 66% since 2007. This is recognised by City Hall. The London Mayor, in conjunction with TfL, launched 'Small Sites, Small Builders' last February. The scheme brings forward land owned by TfL to the market and organisations are able to make bids. The pilot proved popular, receiving bids from a host of organisations, including small to medium developers and community-led housing groups.

## **The Change of Tide**

Seemingly it all came at once. First the draft NPPF was published which had an emphasis on small sites in particular. It was then refined for the final version, arriving at paragraph 68, broadening the scope to both small and medium sites. This specifies local authorities are required to adopt design frameworks, support windfall development and crucially, identify land through the local plan and brownfield registers so that at least 10% of the housing supply comes forward through small/medium sites.

Secondly, the much-anticipated draft London Plan was published for consultation in December 2017 and has since undergone examination. Draft policy H2 (Small sites) sets out what boroughs should do, they're individual housing targets and the requirements for small sites. For the purposes of the draft plan, small sites are defined as sites as below 0.25 hectares. This includes infill developments, residential conversions, extensions of houses and and/or ancillary residential buildings and infill development within the curtilage of a house or within PTAL 3 – 6 or 800m distance of a station or town centre.

The outlying boroughs have been prescribed the highest targets, Croydon topping the list with 15,110 to deliver over a ten-year period, Brent, Bromley and Ealing are also above the 10,000 mark. How this stacks up against the housing targets is also of interest, for example Bromley's overall target is 14,240, meaning that over two thirds of the new homes delivered should be via small sites. The Royal Town Planning Institute, in their response to the draft plan, did express concerns that high housing targets "may be over promising" . The GLA's targets are certainly ambitious but with an overall target of 649,350 and the sacred Green Belt surrounding London, reinvigorating smaller builders is a necessity.

### **Who's doing what?**

It's fair to say that some boroughs are going to have to get on board with this agenda faster than others. Croydon are leading the charge with their newly adopted 'Suburban Design Guide' Supplementary Planning Guidance, which is now a material consideration in planning decisions made by the borough. The guide sets out the vision for the suburbs of Croydon,

The key design considerations, exemplar schemes and various best practise guidance in a myriad of scenarios. Small sites are some of the trickiest with means of access are difficult and there can often concerns from local residents. Clear design guidance sets a benchmark, helping developers and professionals alike understand what the local authority is looking for in development proposals.

Enfield also published a detailed study in January on the topic of small sites, detailing policy, how they may come forward and design precedents across the borough. This was a specific response draft London Plan policy H2 and the borough's target of 983 dwellings per annum. There is no doubt that more boroughs will be following suit, developing evidence bases, best practise guidance and specific policies.

Planning Insight has experience of delivering small sites across London. We work with some exceptional architects to deliver quality submissions to maximise development opportunities. If you have any sites that may be suitable for development, do not hesitate to contact the team for advice.