West London Small Sites SHLAA

'Part B – Delivery and Development Trends'

November 2018

WEST LONDON ALLIANCE

Small Sites SHLAA For West London

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Part B Report: Delivery and Development Trends

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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, 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.

This Report represents Stage Two 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.

This Report should be read alongside the findings of the 'Critique' of the policy approach to support increased rates of development on 'small sites' in the London Plan 2017 that was also requested by the WLA as part of the wider project.

The role of outlining and analysing the pattern and characteristics of development self-evidently make an important contribution to the assessment of housing land supply on 'small sites'. The typically accepted approach to measure opportunities for this type of development is to take account of knowledge gained from observing past trends in delivery and projecting these into the future. Particularly in the London context comprehensive data exists to inform conclusions on these trends through tools for development monitoring such as the London Development Database. Knowledge gained from understanding delivery fundamentally assists in evaluating the proposed policy approach in the London Plan.

The findings of the Critique reiterate the need for a comprehensive understanding of trends in the delivery of small sites over time and across different spatial contexts. Establishing how closely the proposed introduction of a presumption in favour of small housing development is likely to relate to consistent and reliable trends in delivery is key to understanding its potential effectiveness.

The understanding of delivery also builds upon initial concerns in the Critique regards outcomes in terms of sustainability (including 'good growth'), control over development standards and the role of large sites or more comprehensive regeneration. Further analysis of delivery has also been able to capture the contribution and role of a range of different

stakeholders to the development process, including direct engagement with the development industry.

The findings of the delivery analysis start by confirming existing knowledge of trends in development and reflect similar evidence of recorded completions provided by the GLA 2017 SHLAA. This reiterates the departure and step-change in activity sought by the proposed targets for 'small sites'.

Outputs from a comprehensive methodology, which has been applied to add detail to monitoring records, emphasises the significance of this departure and fundamental concerns with the use of evidence to inform draft Policy H2 in the London Plan. We have demonstrated that the value of evidence on past trends goes far beyond details of recorded completions and that a more detailed picture of the development process can be established. Our findings demonstrate that adding detail to delivery patterns exposes weaknesses in the measures of capacity relied upon to inform targets for 'small sites' in the draft London Plan.

It is the conclusion of this research that there is unlikely to be any close match between the achievability of proposed targets and actual patterns of recorded delivery without substantial changes to how the development process operates.

We confirm that the GLA 2017 SHLAA methodology has not taken account of key factors that demonstrate the importance of assessing the 'implementation rate' of planning permissions and the timescales for development. Furthermore, the GLA's measure of capacity takes no account of the clustering of application records at certain addresses and this creates further conflict between measures of capacity and delivery. Other key conflicts with the outcomes sought by draft Policy H2 require recognition of activity outside the types of development supported – including Change of Use and sub-division of flats.

We conclude that draft Policy H2 as proposed is not based on a sufficient understanding of delivery or the development process. It does not necessarily support solutions to barriers identified nor does it necessarily correspond to the full range of opportunities available. This indicates a need for a more comprehensive assessment of alternative approaches, including the role for site identification. A key concern is that if unachievable targets are adopted at the outset of the new London Plan housing need will remain unmet. This will also place a significant burden on constituent London boroughs in terms of resources for managing development and the need for evidence to actually secure opportunities for delivery on small sites and before any step-change occurs.

DISCLAIMER:

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 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, urban capacity and brownfield land registers, 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. Relationship to the Stage One Critique

1.1 This Report should be read alongside the findings of the 'Critique' of the policy approach to support increased rates of development on 'small sites' in the London Plan 2017. This was also requested by the WLA as part of the wider project and is presented in the Stage One report.

1.2 The role of outlining and analysing the pattern and characteristics of development self-evidently make an important contribution to the assessment of housing land supply on 'small sites'. The typically accepted approach to measure opportunities for this type of development is to take account of knowledge gained from observing past trends in delivery and projecting these into the future.

1.3 Particularly in the London context, comprehensive data exist to inform conclusions on these trends through tools for development monitoring such as the London Development Database. Knowledge gained from understanding delivery fundamentally assists in evaluating the proposed policy approach in the London Plan.

1.4 The findings of the Critique reiterate the need for a comprehensive understanding of trends in the delivery of small sites over time and across different spatial contexts. Establishing how closely the proposed introduction of a *presumption in favour of small housing developments* is likely to relate to consistent and reliable trends in delivery is key to understanding its potential effectiveness.

1.5 Development outcomes also need to be understood in terms of their wider relationship with measures of sustainability such as safeguarding development standards, meeting the need for affordable housing and contributing to the 'good growth' agenda. The Critique also outlines that the development process on small sites is complex. It can reflect a significant number of challenges and involves a wide range of stakeholders whose resources and objectives must be understood.

1.6 The Critique also provides a starting point to illustrate that there is likely to be a relationship between the policy objectives to boost development on small sites and the delivery of large sites, comprehensive development and regeneration. This indicates a need to assess, in terms of delivery, the role of existing policies and the impacts of draft Policy H2 both upon these and upon other future potential policy alternatives.

1.7 The project's findings on delivery are provided as the result of a methodology developed to assess these trends and explore relevant factors and characteristics of development on small sites. The findings in-principle provide a greater

understanding of existing trends. The findings look at their consistency and what they indicate in terms of the likely reliability of development actually being delivered to achieve the increased contribution of small sites to the housing needs of London as sought by draft Policy H2 of the London Plan.

Structure of The Stage Two Report

1.8 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 assessing delivery.
- Section 3; explains the use of data from the London Development Database.
- Section 4; develops the methodology for processing and adding detail to the characteristics of schemes identified in the London Development Database.
- Section 5; provides initial results demonstrating that the overall findings on development trends recorded in our sample echo other monitoring evidence and confirm the step-change required by the approach to draft Policy H2;
- Section 6; provides thoughts on the timescales and implementation rates and a more detailed understanding of the development process on small sites gathered from London Development Database records
- Section 7; adds value to details available in London Development Database records to illustrate the relationship between more detailed characteristics of development and challenge their relationship to the outcomes sought by draft Policy H2
- Section 8; explores the relationship between a 'partial pipeline' of future identified supply on 'small sites' and the implication for the London Plan's targets and reliability of future supply
- Section 9; considers the overall findings on delivery in terms of their relationship with existing and potential future policy alternatives, including the delivery process on 'large' sites;
- Section 10; determines whether the observed trends in development are supported by an understanding of the development process, including stakeholder engagement; and
- Section 11; provides conclusions based on the findings on delivery, which should be read alongside the Critique and overall recommendations following the Small Sites SHLAA regarding draft Policy H2 of the London Plan, considering its soundness and the strength of the evidence base

2. The Approach to Assessing Delivery

This section reflects a specific focus on the purposes for providing an assessment of trends in delivery and their relationship to findings through the wider project. It provides an overview of the principles governing this part of the approach to assessing development on 'small sites' and an outline of the methods developed and followed.

Delivery: Underlying Principles and Engagement

2.1 The wider principles for the project are set out in the Part A: Critique. In terms of assessing delivery, the following key points are relevant to the scope of the project

- The context for delivering residential development across London, and within the area of the West London Alliance, is constantly diverse and individual drivers or prospects for delivery may change rapidly.
- Impacts on patterns of delivery will vary over time and between constituent boroughs
- The development process, even for 'small sites', involves multiple stakeholders
- Constraints and opportunities for development (including on 'small sites') will evolve as a reflection of the circumstances within different locations and over different timescales. This may take account of local or national changes to policy, legislation and development management procedures.
- Draft Policy H2 supports a wide range of activity on small sites and the whole range of typologies delivered in the past may be relevant to understanding whether targets for development on 'small sites' are achievable.
- The proposed introduction of a *presumption in favour of small housing developments* nonetheless introduces criteria on qualifying examples in terms of type, scale and location that supports a specific disaggregation and understanding of how past trends are analysed and evaluated.
- Data on individual schemes is key to any assessment as by its nature activity on small sites is typically 'unidentified' until it becomes formally recognised in the development management process.
- The strength of conclusions on delivery will, at least in-part, be determined by the level and quality of data reported to inform development monitoring.

- Data prepared for monitoring purposes will not reveal a full picture on the consequences for sustainable development or the impacts of different policy options.

Summary method

2.2 The overall approach to this project including preceding stages is summarised in the Technical Report for the Part A Critique and the overview within Non-Technical Summaries.

2.3 **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.

2.4 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.

2.5 Analysing these patterns of delivery in more detail allows 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.

2.6 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.

2.7 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.

2.8 A Workshop with Officers in the constituent boroughs was undertaken as part of the delivery assessment. This included participants from the respective Planning Policy and Development Management teams, which was considered necessary to gain a wider range of views on the development process. The workshop was used to more closely evaluate the role and importance of different factors such as the impact of applying existing policies, the nature of individual schemes brought forward and

assessed in planning terms and the experience of managing cases following implementation (e.g. through Discharge of Conditions and overall timescales). It also provided a further opportunity to discuss any understanding of spatial differences in the pattern of development on 'small sites'.

2.9 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 was also undertaken at this stage. This includes, for example, potential relationships between the delivery of large sites and small sites.

2.10 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.

2.11 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.

2.12 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'. It is, however, also within the scope of reporting to determine that common and fundamental issues exist that transcend the context in West London or individual boroughs.

2.13 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 is principally drawn together as part of the Non-Technical Summaries and key findings on fundamental topics.

2.14 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. In-principle these concerns will be capable of being understood through publication of the Non-Technical Summaries but may be further articulated as part of submission of statements directly in response to the Examination in Public.

3. Use of the London Development Database

This section summarises how the methodology for delivery analysis is shaped by the availability of data to inform the assessment. It explains how the data was obtained and the specific time periods and the form of outputs chosen for analysis. It also identifies potential issues and illustrates how the 'raw' source data might be used to add further detail to understand patterns of activity and the characteristics of development.

London Development Database

Overview

3.1 The London Development Database (LDD) is a system used by the Mayor to monitor planning permissions and completions across London. It has been running since 2004 and is a hugely valuable resource in terms of measuring the effectiveness of planning policy and progress towards meeting development needs. It provides a comprehensive platform in terms of obtaining consistent, good quality data on development trends and planning application activity, from approval through to implementation. In the literature review for this project we identified the specific benefits of the planning application monitoring systems for London in tracking the very high volume of activity across smaller schemes (both in terms of completions but especially the 'pipeline' of potential supply) that is not always highlighted by national sources and submissions to central government.

3.2 Information captured by the London Development Database covers data for approvals and completions leading to changes in residential and non-residential floorspace as well as highlighting any change in the protection status of open space. The London Plan Annual Monitoring Report relies on a range of data sources. In terms of raw inputs and measures of development activity, information obtained from the LDD provides the starting point to evaluate several of the Key Performance Indicators assessed – and by extension looking to establish the effectiveness of the London Plan.

3.3 At the outset and as part of our Delivery Workshop the constituent boroughs were nonetheless keen to stress that their past experience of the LDD reflects this role as a tool primarily for ***planning and development monitoring***. We would not seek to suggest that the LDD as a resource, and the role of effective monitoring, cannot form an important element of the policy process. Identifying 'triggers' and mechanisms for review based on the results of monitoring data can ensure policies are changed to more effectively manage relevant development outcomes. However, the key questions for this study is whether the robust application of data from LDD can be

used to fully test the approach and potential impacts of draft Policy H2; and whether such analysis is fully set out in the GLA 2017 SHLAA?

3.4 This project relies on data extracted from the London Development Database to assess patterns of delivery on 'small sites'. To this extent, and in a similar way to the GLA SHLAA 2017, our assessment does aim to test potential policy impacts and evaluate potential outcomes (particularly in terms of the tests in national policy and guidance for *windfall* development) using information from the LDD. Observations on different development trends and outcomes also provides some evidence to evaluate other potential policy options.

3.5 More importantly for the following analysis, we nonetheless identify the data in the LDD is not fully populated with fields that help easily assess the impacts and criteria of draft Policy H2 (i.e. detailed characteristics of development and sub-categories by type and scale). Some of this can be overcome with further processing and applying judgement on records. As a result, the GLA 2017 SHLAA and proposed approach to 'small sites' will inevitably overlook some of the detail in terms of the characteristics of past trends and their potential relationship with the outcomes sought in draft Policy H2. In some cases, as we highlight in the Critique, data employed to support the 'modelled approach' (i.e. the sample of all schemes used to calculate conversion factors) will include records that are not consistent with the presumption in favour of small housing developments.

3.6 This emphasises why the analysis of ***delivery*** needs to be read alongside the wider Critique in terms of evaluating the process for testing evidence in the GLA SHLAA 2017 and the proposed approach through draft Policy H2 in the London Plan 2017.

Relevant LDD Criteria and Indicators for this Assessment

3.7 In undertaking the analysis for delivery as part of this project we have taken a wider view of the records held in the London Development Database than considered in the GLA 2017 SHLAA. These are briefly summarised below, with detailed background on how these criteria are entered into the LDD (and their value for subsequent reporting) covered in Appendix 1.

- Records are entered onto the LDD at the point of **'Approval'** (typically within three months) of permission being granted, enabling monitoring the 'life-cycle' on consent on small sites including completion, non-implementation and committed supply;
- Consistent with the GLA 2017 SHLAA, reflect **all records relevant to self-contained residential development**[1] in accordance with the following requirements for entering schemes onto the LDD:-
    - any new build residential units; and
    - any loss or gain of residential units through change of use or conversion of existing dwellings
- Reporting by the 'New Build', 'Conversion', 'Change of Use' and 'Extension' **Development Types** used to classify LDD records, highlighting that analysis in the GLA 2017 SHLAA appears to regard all 'Extension' schemes as 'New Build' with subsequent implications of whether these accurately relate to 'modelled' elements of supply;
- Noting that **Garden Land** does not exist as a separate LDD criteria and hence matching records to the GLA 2017 SHLAA where this criterion is applied;
- Reporting on all records by **Permission Type**, noting this will include examples outside of normal planning control (e.g. Certificates of Lawful Development) and residential development ancillary to other uses (e.g. Granny Annexes).
- Data can be reported over different time-periods, but most commonly by **Financial Year i.e. FY2017 equates to 1 April 2017 through to 31 March 2018** (this period is also called the 'monitoring year' over which change in development activity is reported).

[1] Our sample does not deal explicitly with the records entered into the LDD that relate to the provision of non-self-contained accommodation (e.g. Halls of Residence) but overlaps with other development under this criterion e.g. *Sui Generis* Homes in Multiple Occupation may arise where this development results from a loss of single family dwellinghouses. Whilst our dataset on non-self-contained uses is therefore not a complete sample, we consider the potential implications for housing need in subsequent chapters.

Summary of the Sample Chosen

3.8 Appendix 1 provides full details of the reasons for selecting the sample used in the delivery analysis. We have considered the important distinctions for how data is entered into the LDD and the subsequent options available in terms of reporting and the timescales for analysis.

3.9 In summary, details of an individual **'scheme'** level record in the London Development Database can be composed of multiple entries capturing the different **'unit level'** characteristics of a proposal (i.e. different property types and bedroom numbers. Both **'scheme-level'** and **'unit-level'** data can record fields for similar characteristics (e.g. Development Type and Permission Type) but only one specific entry can be chosen for the scheme record. This has the result that the scheme record may be a **'hybrid'** of different unit-level entries. **'Scheme-level'** records can also only be reported as 'completed' in full at a single date in time, whereas **unit-level** records can be registered complete individually at different points in the development period.

3.10 We have carefully considered how to reflect the implications of these differences in selecting the most appropriate sample. It was agreed that taking into account the following points the majority of reporting should be undertaken using the characteristics of development established by '**Approvals' data at Scheme Level** for the FY2004 to FY2017 period (1 April 2004 to 31 March 2018). This was considered to have a number of advantages beyond solely focusing on completion records or seeking to report activity at 'unit' level:

- **'Approvals'** records allow examples of Lapsed and Superseded consent to be considered, as well as the extant pipeline of 'Submitted' (i.e. 'not started') schemes;
- use of a **14-year period** does not prevent more focused analysis on specific timescales as 'Financial Year' data can be assigned to each scheme level record (i.e. year of permission and year of completion (if applicable));
- **'scheme'** level information can identify more complex development types and '***hybrid***' examples not easily reflected in 'unit level' analysis;
- **'scheme'** level information provides a more focused position against which to reflect multiple consents on an individual site and to ensure the assessment of total proposed units corresponds to draft Policy H2's criteria;
- reporting by unit type and bedroom number was not considered directly relevant to the main objectives of analysis (having not been covered in the GLA 2017 SHLAA) and may be subject to greater issues with data quality; and
- we found very few examples of 'unit level' data for 'small sites' identifying completions across multiple financial years, suggesting a limited loss of detail in analysis of this criteria at **scheme** level

3.11 This represents a starting point that uses a potentially wider range of information than taken into account in the GLA 2017 SHLAA, particularly by reflecting a more up-to-date position and acknowledging that the development process is not solely illustrated by 'completed' records. However, we have also taken steps to demonstrate that the larger number of records in our sample can be easily matched to entries that correspond to the dataset for the GLA 2017 SHLAA. This demonstrates consistency and also allows population and comparison with some of the indicators used for analysis by the GLA (such as 'Garden Land'). The ability to focus reporting within different time-periods also retains consistency. Comparisons and the relationship between our sample and the GLA 2017 SHLAA can therefore be highlighted in subsequent analysis.

Initial View on Limitations of Use of the LDD and LDD Indicators

3.12 Notwithstanding the detailed analysis possible based on a sample comprising records based on the above criteria it is necessary to acknowledge those aspects of development and potential development not captured in the sample.

- The sample is based solely on consented ('Approved') records and provides no information on the characteristics of 'refused' proposals
- No data has been considered on application to modify existing property not resulting in a net gain or loss of dwellings (i.e. residential extensions and Certificates of Lawfulness for Proposed Use or Development ('CLOPUD')
- Applications for 'replacement dwellings' (resulting in zero net change) may not always be entered onto the LDD

3.13 At our Delivery Workshop with Officers it was noted that incentives such as increased Permitted Development Right for householders have had a significant effect on the uptake of modifications to single family dwellinghouses. It was also acknowledged that in future information on refused schemes could be valuable – particularly where proposals were subsequently approved giving a truer reflection of the development process and timescales. These elements may reflect priorities for future work. As a result of the Workshop, it was decided to retain records for 'replacement dwellings' in our sample on the basis that they reflect trends contrary to the assumptions for intensification applied in the GLA 2017 SHLAA.

3.14 It is also relevant to highlight that we have not sought to 'correct' records as part of our review of LDD entries. Within the vast size of the sample obtained a small number of entries with discrepancies in reporting is to be anticipated due to human error as well as changes in legislation and how proposals are classified. Such issues do not affect the overall methodology or the principle of using delivery analysis to supplement our understanding of factors affecting delivery.

4. Methodology for the Delivery Assessment

This section summarises the overall approach to assessing delivery in the context of the project. It deals with why particular indicators were identified and why they are considered most appropriate to the analysis and feasible within the context of the information available. It essentially provides the framework to define how value can be 'added' to records within the London Development Database to provide a more detailed view on the characteristics of development.

Key Objectives of the Methodology

4.1 This section deals with our overall approach and methodology for processing information obtained through the London Development Database to assist the assessment of delivery. It illustrates how the objectives of the 'small sites' SHLAA can be enhanced by adding detail to the records and characteristics of development contained within LDD entries whilst not affecting the source data used to inform the sample. In terms of informing the proposed approach to draft Policy H2 in the London Plan 2017 we broadly identify three key themes within the methodology to provide a comprehensive illustration of 'small site' delivery:

- **A 'finer grain' illustration of development type and scale;**
- **Spatial analysis of delivery trends using the geographic criteria of draft Policy H2 and other land use indicators (where relevant); and**
- **Understanding aspects of the development process relating to timescales for development and the implementation rate of planning permission**

4.2 Understanding the approach that we have followed is important as part of the audit trail to demonstrate one way of how available data can be employed. It represents an opportunity to explore the information available in the LDD in more detail and demonstrate why further processing is necessary to fully interpret the characteristics of development. We have developed an approach that highlights a potentially significant range of issues, whilst acknowledging potential limitations in data. Essentially, the methodology **enables a comparison with the approach to estimating supply from 'small sites' in the GLA 2017 SHLAA**. It is a means of demonstrating why omissions in how the GLA 2017 SHLAA has presented the characteristics of development can have potentially significant impacts on the robustness of modelling assumptions and the likely reliability of supply compared to the outcomes and level of supply sought in draft Policy H2.

4.3 Whilst the methodology is important, the overall objective of the analysis is to demonstrate that specific issues and **factors affecting delivery** are highly relevant to any understanding of past trends. The exact approach is less relevant given that the need to explore topics such as timescales for development, the availability of sites and the impact of planning obligations have already been flagged in the Part A Critique. As subsequent results illustrate, the ability to associate these factors with specific observations of past trends adds significantly to the weight that can be attached to their importance. This represents **the key element in determining whether the approach to draft Policy H2 is sound in principle**, notwithstanding the point that data can be used in different ways subject to availability.

4.4 The remainder of this chapter summarises the principles for use of the LDD sample dataset and how fields to analyse key themes can be established and populated. It can be read alongside Appendix 1 providing more detail on the background to the LDD and our specific use of data.

Processing Methodology

4.5 For each of the constituent boroughs an amended version of 'scheme level' information has been prepared, supplemented with additional indicators and signifiers for development characteristics. These indicators provide a relationship to 'Completions' data as provided by the boroughs and cross-referenced to trends in completions reported by the GLA SHLAA. This allows the additional indicators to reflect scheme information from, for example, 'unit level' completions data and the classification used by the SHLAA. It is important to reiterate that **none of this analysis or processing amends the 'raw' data in our original sample**, aside from minor corrections to anomalies in address detail i.e. 'missing postcodes'.

4.6 The following critical columns have been added to the 'Raw' Scheme Level Data as part of populating additional indicators:

- Identification of **'Hybrid' Records** (multiple development types at 'unit level' within a 'scheme' level entry)
- Identifying **matches with the GLA 2017 SHLAA** 'past trends' dataset and referring to 'SHLAA Development Type'
- Identify **the 'type' of existing unit affected** by 'scheme level' proposals (i.e. flat or dwellinghouse)
- Establish a **'Unique Address'** identifier for each scheme – using either a 'Site ID' incorporated within the borough Planning Application Reference or otherwise through a concatenation of 'Site Name' and 'Postcode' from within the 'Scheme Level' sheet; and
- Enable **a 'multiple applications' criteria** to be populated where two or more applications at 'scheme level' can be attributed to the same unique address appearing more than once in the dataset.

4.7 Appendix 2 details the specific process used to create and populate data in these additional fields and why this provides a foundation to support more detailed analysis. Our bespoke analysis allows a level of detail that exceeds the existing value of the LDD in assessing discrete recorded entries. This is particularly the case for any approach that seeks to demonstrate how application activity may be particularly concentrated at individual addresses, indicating more complex patterns of development. There does not appear to be any specific in-built function for this analysis in the LDD. This essentially goes beyond one of the main purposes of the LDD (i.e. to report total output based on a combination of record entries) and seeks to provide reasons for specific patterns and types of activity as well as their relationship with past trends.

Opportunities for Analysis Following Processing

Development Type and Scale Analysis

4.8 A key output following processing of the LDD data is to be able to differentiate schemes based on 'Development Type' and the 'scale' of proposals. This is amongst the simplest types of reporting, particularly given that 'Development Type' is an existing criterion for entry onto the LDD.

4.9 We have populated fields with the following sub-categories to allow a breakdown by 'Development Type' against the following indicators:

Site Size

- 0-0.1ha; 0.11 – 0.25ha; and greater than 0.25ha

Number of Proposed Units

- 0-10 units; 11-25 units; 25+ units

4.10 The criteria are important in terms of identifying any initial relationship between 'scheme-level' data and the effect of the proposed *presumption in favour of small housing developments*. An understanding of the proportion of activity on the very smallest sites (i.e. below 0.1ha) is considered valuable in terms of potentially indicating whether this corresponds to most types of *residential intensification* or if a significant proportion of schemes rely on a somewhat greater site area (i.e. larger backland or infill plots).

Spatial Analysis

4.11 Once the data has been processed and further analysed as described above it is possible to produce an intersection between the location of a scheme and the geographic criteria of draft Policy H2 – specifically whether schemes fall inside or outside relevant 800m 'buffers' to Town Centres and Stations. This is possible as each LDD entry contains accurate information on location based on 'Easting' and 'Northing'.

4.12 It is important to highlight that the relationship of a scheme to relevant Station and Town Centres buffers is a 'one-to-many' relationship. We have previously indicated through the Critique that any given location in a constituent buffer might fall into several buffers. More detail on the value of this analysis is set out in the following sections and the relationship with the overall methodology is explained in Appendix 1. We have also considered whether the use of 'Polygon Data' for individual LDD records would be beneficial to show the relationship between sites and consider that due to the incomplete nature of data this would not significantly add to the weight of our findings.

Understanding the Development Process

4.13 The broad objectives of this element of the analysis are to understand the range of information held by the LDD reflecting **timescales for development** and the **implementation rate** of approved schemes. This provides a wider view on the development process for 'small sites' and reflects factors that are not addressed by the GLA 2017 SHLAA in providing a measure of *capacity* and comparison with specific trends in completions.

4.14 This analysis is enabled using the current status of applications at 'scheme-level' recorded in the LDD and the specific dates entered to identify the date of permission and completion (where relevant). We have adapted analysis so that it seeks to represent the most appropriate period for assessing relevant factors and making like-for-like comparisons. For example, this takes account that where multiple scheme-level records are completed on the same unique site a much longer-term view needs to be taken on the overall timescale for development. Likewise, it is more appropriate to take a view on the overall proportion of schemes that 'Lapse' or are 'Superseded' by reporting data over historic periods (e.g. to 31 March 2016). This ensures that applications forming part of the current pipeline of supply are not misinterpreted as unimplemented.

The Approach to Incorporating Additional Characteristics of Development

4.15 A second stage of the processing methodology and approach to providing more detail on the pattern and characteristics of development on 'small sites' relies on a review of the 'scheme-level' details already entered into the LDD. In some cases, this involves reviewing the content of individual data fields for more information (i.e. the 'description of development'). In other cases, it involves findings gained from judgement based on the implications of multiple LDD criteria (i.e. to confirm whether a net loss of dwellings represents a straightforward demolition or *a 'de-conversion'* of two smaller units into one larger property).

4.16 Development characteristics identified on this basis are assigned to separate fields alongside the original sample i.e. they do not change the 'source' data itself. The starting point for adding detail closely relates to the main 'Development Type' identified within the LDD. However, following an initial review of LDD entries and as part of our instructions from the client it appeared clear that that these should be expanded upon as part of a wider hierarchy of permission and development categories.

4.17 To a large extent this view is supported by draft Policy H2 itself (in-particular Part D) which seeks to specify characteristics supported by the *presumption in favour of small housing developments* that go beyond simple categories of 'New Build' or 'Conversion'. It is also the case that development through Change of Use (not specifically supported by Part D of draft Policy H2) exhibits a wide range of characteristics (particularly given the range of Permitted Development Rights currently available).

4.18 We have essentially applied criteria to identify additional development characteristics as part of a 'hierarchy' that uses the 'Development Type' recorded by the LDD as the starting point. We have included a copy of the 'classifications' used in analysis at Appendix 2.

4.19 Our subsequent findings illustrate the value added by providing more understanding of the individual characteristics of development. This provides some basis to identify what appear to be key components of opportunities for schemes and 'small sites'. Conversely, some of the characteristics highlighted demonstrate additional impacts or potential conflicts with the proposed operation of draft Policy H2. Appendix 1 provides some additional detail on how the hierarchy for classifying different application records has been applied.

5. Findings on Overall Trends by Development Type

This section deals with an understanding of overall trends in development on 'small sites' and demonstrates that the findings from our analysis of delivery can be benchmarked relatively straightforwardly with the information available to inform the GLA SHLAA 2017. Findings are therefore presented that illustrate the relationship between observed trends and the proposed types of development and measures of capacity relied upon to support the GLA's proposed introduction of targets for development on 'small sites'. Confirmation of an existing understanding of delivery levels from 'small sites' confirms concerns in the Critique regarding the significant 'step-change' in activity sought by the draft London Plan.

Overview

5.1 This section provides an overview of key findings and outputs from the review of information on housing delivery contained within the LDD and following the processing methodology covered in Sections 3 and 4 above. It firstly comprises an overall picture of development trends and characteristics principally at borough-level and against the broad criteria of draft Policy H2. It also aims to demonstrate that our reporting remains essentially consistent with the evidence assessed by the GLA 2017 SHLAA.

5.2 These broad findings are necessary to explore in more detail specific trends and characteristics that can be gathered through the LDD. This chapter represents a summary of main results. Annexes covering individual constituent boroughs provide the reporting of 'raw' data should be read alongside this for more detailed insight into the analysis of data.

Benchmarks

5.3 The purpose of Annex A is to demonstrate consistency between our reported findings and the analysis of 'past trends' covered by the GLA SHLAA 2017. We have limited the comparison to the '8-year' trend FY2008 to FY2015 as this represents the main 'past-trend' alternative shared with individual boroughs as part of the 'Housing Target Summaries' to demonstrate outputs from the 'small site' methodology.

5.4 There is no opportunity to compare completions after 31/03/2015 as the dataset relied on by the GLA SHLAA 2017 ends at this point. It is in principle possible to extend the comparison back to FY2004 but as noted because we are using an 'approvals' dataset from 01/04/2004 our information may not reconcile as closely with completions reported in the GLA 2017 SHLAA's 12-year series FY2004-FY2015. This

will contain instances of schemes approved before April 2004 and not available in our sample.

5.5 At the outset of analysis, it is appropriate that our benchmark reflects the total amount of development activity recorded in the GLA 2017 SHLAA dataset for 'small sites'. This means that the comparison also includes all development recorded on 'Garden Land' and the 'Change of Use' category includes schemes brought forward through Permitted Development (including office-to-residential conversion).

5.6 The GLA 2017 SHLAA makes adjustments to these elements to remove them from the findings on 'past trends' but for the purposes of our analysis of delivery they need to be demonstrated as part of the overall information on patterns of activity. The results in Annex A are therefore a comparison between our dataset and the 'small site completions' series shared with individual boroughs as part of their Housing Target Summaries. This includes all completions at 'unit-level' prior to any removal of certain components from the 'past trends' series (see GLA 2017 SHLAA Table 6.3 for unadjusted totals). The information presented within this series as part of the information shared with constituent boroughs was referred to as 'Approach A'.

5.7 The purpose of Annex A is therefore to confirm that our analysis uses essentially the same raw data and findings as the GLA SHLAA 2017. Any scheme level record that can be matched to data taken into account by the SHLAA has had an 'Approach A' classification label applied.

5.8 Where differences do appear to exist, they are minor in nature. This may be due to revision of the LDD (affecting sample size) or 'scheme-level' and 'unit-level' differences in terms approval and completion date as well as how certain types and classifications of development have been processed. We have addressed features of the GLA 2017 SHLAA such as the classification of development on 'Garden Land' and its relatively limited relevance to 8-year and 12-year trends in West London under the Part A Critique. However, we are also able to refer to these classifications within the analysis of delivery, where relevant.

5.9 For each constituent borough Annex A demonstrates that there is a high level of consistency between 'net' annual completions by development type covered by the GLA 2017 SHLAA series and our dataset. Table 5.1 below summarises these findings and shows there is typically less than a +/- 5% difference between the GLA 2017 SHLAA and our sample by constituent borough and each separate 'development type'

5.10 Where small annual fluctuations and differences exist, this is essentially a function of our 'scheme-level' data assigning all completions to a single year whereas the GLA 'unit-level' series captures these across all Financial Years delivering completions. However, the data indicate that the vast majority of activity on 'small sites' is recorded as complete within a single year.

5.11 There appear individual instances where schemes may be captured in the GLA 2017 SHLAA dataset and not in our sample or vice-versa. There may also be instances of

completion dates being revised in to different periods. These examples are limited and reflect nature of the London Development Database as a 'living' dataset where the accuracy of summary reports reflects specifically the time they were run.

	Change of use	Conversion	'Garden Land'	New Build
LB Barnet	-8.9%	4.4%	-15.1%	-3.1%
LB Brent	12.7%	3.0%	5.0%	-9.5%
LB Ealing	0.2%	-0.9%	-9.0%	-4.3%
LB Harrow	1.3%	-2.4%	-3.9%	-4.8%
LB Hillingdon	9.2%	-2.0%	-3.9%	-3.6%
LB Hounslow	4.2%	-6.9%	-8.8%	-4.0%

Table 5.1: Percentage Difference Between FY2008 to FY2015 Completions in the GLA 2017 SHLAA Matched to 'Small Sites SHLAA' Sample Data (by Development Type) (see Annex A)

Scheme Level Approvals Outside the Benchmark Comparison

5.12 The information at Annex A also confirms the full size of our sample data in terms of the 'potential' net residential gain comprised within the total number of schemes over the sample period. What this principally demonstrates is the extremely large volume of information on factors affecting delivery contained within the London Development Database and not reflected upon by the GLA SHLAA 2017.

5.13 Where data cannot be matched the 'Approach A' series recorded by the GLA has been assigned a 'N/A' classification. The most straightforward way to interpret these additional scheme records is by the 'current status' of the application record. The GLA SHLAA 2017 is only concerned with 'completed' development. All schemes that are currently not started (i.e. recorded as 'Submitted') or have subsequently Lapsed or been superseded will not match the SHLAA dataset. In our view these records are essential to inform wider trends in the delivery process. In the case of 'submitted' records and those currently recorded as 'Started' these will essentially inform understanding of the current 'partial pipeline' for activity on small sites in the immediate years from 1 April 2018.

5.14 It can also be demonstrated that there are a very small number of schemes recorded as 'Completed' between FY 2008 and FY 2015 picked up in our dataset and not recorded in the GLA 2017 SHLAA series. These are heavily concentrated in the later

years (FY 2014 and FY 2015) indicating data on completions may have been updated or added retrospectively following distribution of the information relied upon the by GLA 2017 SHLAA.

5.15 It should be noted that Annex A displays 'Completed' records within our dataset only against FY2008 to FY2015. This is for the purposes of comparison. Our delivery analysis does not omit information on completed schemes from FY2004 to FY2007 or FYs 2016 and FY2017. We include this in the overall analysis of specific issues where it provides a comprehensive or longer-term view. We would highlight that in terms of data for completed schemes in the most recent full monitoring year (i.e. FY2017 – 1 April 2017 to 31 March 2018) there is a greater possibility that full information on completions is incomplete at this stage. Our analysis for this period may need to be cross-checked with the constituent boroughs' future reporting as part of formal annual monitoring procedures.

Relationship with Other Evidence of Overall Trends

5.16 The consistency between our findings and overall trends in monitoring data should be noted prior to more detailed analysis. It is unsurprising that our findings start from a point that generally reflects key drivers of activity that have already been acknowledged. This builds upon the broader issues highlighted in the 'Critique' in terms of the extent to which the 'modelled approach' to support the *presumption in favour of small housing developments* departs substantially from a more detailed understanding of current trends.

5.17 An initial straightforward, overall comparison can be provided against sources such as the GLA 'Housing Research Note 2018/01' – 'The profile of London's new homes in 2016/17: Analysis of the London Development Database' (May 2018). More recently this has been supplemented by the 'London Plan Annual Monitoring Report 14' (September 2018 – covering the period to 31 March 2017). However, the 'Research Note' provides a greater level of detail by development type and broad geographic areas of activity.

5.18 The summary position reported by the Research Note in terms of the proportion of activity on 'small sites' and explanation for recent changes in trends can be shown as broadly applicable to each of the constituent West London Boroughs.

5.19 Our dataset does not allow a simple comparison with completions on 'Large Sites' due to the use of 'scheme-level' data that will not accurately reflect that on bigger schemes units are delivered over multiple years. Table 5.2 below compares the findings from our dataset of all net completions on small sites (all activity on schemes under 0.25ha) with the total net completions for the 2014/15 to 2016/17 period (as

recently reported in Table 3.7 of the London Plan AMR 14). Also shown are the respective 'Large' and 'Small' site totals for Inner and Outer London given in the GLA 'Research Note' covering the same period.

	Total Net Completions 2014/15 to 2016/17 London Plan AMR 14	'Delivery Analysis' Sample All Net Completions on 'Small Sites' under 0.25ha		Small Sites' as % of Net Completions
LB Barnet	5444	1396		25.6%
LB Brent	4017	1025		25.5%
LB Ealing	3073	1305		42.5%
LB Harrow	1975	1046		53.0%
LB Hillingdon	2485	890		35.8%
LB Hounslow	3032	1159		38.2%
WLB Total Position	20026	6821		34.1%
	Total Net Completions	**Small Sites**	**Large Sites**	**Small Sites as % of Total**
Research Note - 'Outer'	51112	19948	31164	39.0%
Research Note - 'Inner'	41568	14010	27558	33.7%

Table 5.2: Comparison Between Proportion of Development on 'Small Sites' Indicated by 'Small Sites SHLAA' Sample Data and Compared to London Planning Annual Monitoring Report 14

5.20 It is thus the case that the proportion of delivery on 'small sites' in West London overall corresponds closely with trends observed by the GLA. There are variations within some boroughs; particularly LB Barnet and LB Brent that have recently delivered a higher proportion of completions on 'Large Sites' with trends on activity in small sites remaining relatively constant.

5.21 Understanding trends in activity by development type is important to better understand small site delivery as a proportion of the total, noting in-particular that activity within this category has generally increased in recent years. The GLA 'Research Note' (pp.20 and 21) details the increasing representation of the 'Change of

Use' development type in increasing net delivery in Outer London, specifically illustrating that 'small sites' provide the source of many such schemes. Within 'Inner London' activity through Change of Use has been more static, with the main contribution to increased activity resulting from increasing output on 'New Build' schemes as part of the recovery from the recession.

5.22 Our illustration of overall benchmarks in Annex A illustrates that this changing pattern by development type is generally applicable in West London. We have further interrogated the sample dataset to understand this over a finer-grained timeline and breakdown of activity.

5.23 Because our sample comprises a dataset based on 'approvals' it is possible to illustrate the changing timeline of activity by development type based on the potential net gain in dwellings actually entering the system in a given year. These totals can be reported irrespective of the current status of applications - some of the relevant schemes will correspond to those recorded as completions. Others (particularly those approved most recently) will be part of an outstanding pipeline of consent. However, this also demonstrates that where a 'gap' exists between the amount of development approved and actually delivered in subsequent years there will be some instances of schemes not translating into completions.

Timeline of Approvals and Completions

5.24 First understanding the changing pattern of approvals earlier in the timeline is essential to explain and largely substantiate the reasons for changing net delivery on small sites. The tables and graphs at Annex B therefore set out a timeline by development type from FY2004. In terms of completions these are provided from FY2007, to account for the fact the 'approvals' dataset is unlikely to record the majority of schemes delivering completions near the start of the series.

5.25 Another feature of Annex B is the ability to illustrate trends both in terms of the 'count' of schemes approved as well as the resulting potential net residential gain. This is important as it highlights that for certain development types the number of schemes approved can fluctuate and increase or decrease relatively significantly over a short period of time. Some caution is therefore needed on the weight that can be applied to these trends, for example boroughs where there has been a recent increase in the number of approved records for 'Conversion'. There are three principal reasons. Firstly, this change may be preceded by a previous downturn in approvals. Secondly, the number of approved schemes will not necessarily correspond to potential net gain; this could be lower than in the past due to a need to comply with space standards or if a number of records relate to *de-conversion* of property. Finally, it will not necessarily be the case that all approved records have or will translate into completions.

5.26 Annex B indicates a number of key features and general trends across West London. One trend common across all constituent boroughs is an increasing 'gap' between

the total potential net gain in dwellings approved and annual recorded completions. The uplift in recorded delivery is less than indicated by the trends in total approvals. In some respects, this is likely to reflect the relatively recent nature of the growth in commitments that would be expected to complete in future years. However, where the gap extends to earlier years in the series this may correlate to issues initially identified in the 'Critique', such as the instances of unimplemented consent or the need to bring forward subsequent revisions or alternative schemes.

5.27 In terms of 'New Build' schemes our sample records all schemes, including those proposing more than 25-units. Where these are concentrated in particular years this may distort the number of units approved or delivered from this development type in a given year.

5.28 Annex B generally indicates that trends in approvals have fluctuated over the sample period. This correlates with the view in the 'Part A' Critique (in analysing past trends) that differences in past trends based on 8-year and 12-year periods are relatively less significant in West London. There has not generally been a sustained downward trend in either the approval or delivery of 'New Build' schemes later in the sample period. There is some indication of such patterns in LB Harrow and LB Hillingdon, where this may relate more closely to stronger policy restrictions for development on 'Garden Land'.

Other Key Findings of The Processing Methodology

5.29 Before undertaking more detailed analysis it is also appropriate for this section on overall findings to provide an initial indication of where our own processing methodology for sample data begins to differentiate scheme characteristics. This essentially confirms the value of recognising that a finer degree of understanding might indicate different outcomes in terms of the relationship between delivery trends and draft Policy H2.

Findings by Evidence of Multiple Schemes at a Given Address

5.30 This analysis is significant alongside the existing pattern of findings and supports a key element of the methodology for delivery assessment. Our approach to processing data has identified numerous instances where sites identified by the same 'Unique Address' demonstrate evidence of multiple scheme-level records within the sample series. Full findings from this analysis are set out in Annex C. Table 5.5 below summarises the overall position by each constituent borough in terms of evidence of 'multiple schemes' as a proportion of the sample total (by count of applications):

	'Multiple Schemes' within same Unique Address	Sample – Total Applications Records	Multiple Schemes as % of Total
LB Barnet	1295	3884	33.3%
LB Brent	384	2061	18.6%
LB Ealing	766	3235	23.7%
LB Harrow	350	1972	17.7%
LB Hillingdon	613	1640	37.4%
LB Hounslow	293	1230	23.8%
WLB Total	**3701**	**14022**	**26.4%**

Table 5.5: Unique Addresses with Evidence of Multiple Schemes 'Approved' within the Sample Dataset (from Annex C)

5.31 Fundamentally this position is the starting point to assess a range of elements in the development process and their impact on past trends both in terms of **capacity for development** and **delivery**. Given activity is concentrated on fewer unique sites than implied by the total number of records the following points are potentially significant and will benefit from further analysis:

- The 'gap' between the GLA 2017 SHLAA's 1% 'yield growth factor' to intensify existing stock per annum and the existing trend in where the 'modelled' elements of small site development takes place is increased wherever two or more examples are in-fact delivered at the same location; and
- There is also a potential issue of **'double-counting'** that we would seek to explore further where small sites consistent with the 'modelled' elements of supply are approved alongside other records at the same location that would separately part of the 'remaining windfall' trend i.e. 11+ units; and
- The actual timescales for development should start from the first permission granted on a site and conclude when a scheme (potentially under a different approval) is actually delivered, indicating substantially longer horizons.

5.32 Potential impacts are set out in more detail in subsequent sections.

5.33 The exact nature of findings will to some degree be dependent on the ability to identify 'Unique Addresses' and match relevant scheme references within the sample data. However, the evidence is generally consistent that between 20% and 40% of schemes exist alongside other records applicable to the same unique address.

5.34 It should be noted that the analysis above simply deals with all 'approved' schemes. This does not separate records into the status of the application, the 'development type' or whether units have actually been delivered. Table 5.6 below shows the total on 'multiple schemes' distributed by development type.

	Change of use	Conversion	Extension	New Build
LB Barnet	33.8%	20.2%	41.6%	44.5%
LB Brent	22.6%	10.7%	27.3%	27.0%
LB Ealing	28.8%	18.4%	34.4%	27.2%
LB Harrow	20.6%	11.3%	32.3%	24.4%
LB Hillingdon	44.1%	18.9%	41.9%	41.7%
LB Hounslow	30.6%	16.6%	27.4%	22.5%
WLB Total	**33.8%**	**20.2%**	41.6%	44.5%

Table 5.6: 'Multiple Schemes' Approved on Unique Addresses Within Constituent Boroughs Distributed by Development Type

5.35 The reasons that one development type might be associated with a higher proportion of schemes on sites with multiple entries are varied. Principally this could either be because they are typically found alongside other records brought forward through a different development type (i.e. completions from two different schemes). Alternatively, there may be multiple scheme-level entries for the same development type where one example has 'lapsed' or 'superseded' and a replacement proposal been put forward. This is explored further in subsequent sections.

Hybrid 'Scheme-Level' Development Types

5.36 As part of the overall trend we have identified the need to further explore distinctions that exist between the use of 'scheme-level' and 'unit-level' data and any issues that this might cause in terms of understanding patterns of delivery. This is potentially a two-way relationship: in some respects, data will reveal more at a finer-grain of detail at unit level; in other areas an overall picture of the characteristics of development will be lost by breaking down information to its constituent parts.

5.37 For this analysis we focus on the latter outcome due to the GLA 2017 SHLAA's reporting on 'unit-level' data only. The evidence base for draft Policy H2 places significant weight on trends by specific development type and in-particular 'conversion' of existing residential premises and 'new build' development. It is a function of the London Development Database that individual units qualifying as these development types may in-fact be part of a wider scheme which (at 'scheme-level') may be classified differently. For example, development may comprise Change of Use of non-residential premises to flats or dwellings whilst also potentially facilitating the sub-division of some existing residential units within part of the scheme. Whilst this specific component affecting existing units would normally be recorded as a 'conversion' the 'scheme-level' data is likely to reflect on overall proposal classification as 'Change of Use'.

5.38 The approach to processing data for reporting in the GLA 2017 SHLAA further exacerbates this by reclassifying unit-level' data recorded as 'Extensions' into the 'New Build' development type.

5.39 The implication of this approach to understanding characteristics of development is that by failing to recognise the distinction of these '**Hybrid'** development types less weight may be placed on the GLA 2017 SHLAA's findings in terms of providing a measure of *capacity* for certain types of development. Such schemes are unique in nature, making past trends a better guide than relying on uncertain modelling assumptions. Such records as a minimum provide confirmation that the *presumption in favour of small housing developments* will not necessarily be straightforward to operate in practice. This applies wherever difficulties arise in terms of indicating which (of any) of the criteria at Part D of draft Policy H2 proposals accord with and equally those aspects (such as Change of Use) potentially indicating a conflict.

5.40 This has obvious potential effects in terms of the approach to decision-taking. Whilst there will inevitably be instances of such schemes being approved, it will not be clear that draft Policy H2 will itself have a direct role in determining that proposals should be considered acceptable. It follows **that 'hybrid' records are a potential barrier to the measures of capacity provided in the GLA SHLAA 2017**, in terms of whether targets would be achieved by operating the policy in practice.

5.41 Annex D of this Report summarises, for each constituent borough, the proportion of 'potential' net residential gain on approved schemes within the sample dataset that

can be attributed to schemes comprising '**hybrid**' development types. Table 5.7 below summarises the proportion of dwellings on 'hybrid' schemes for each constituent borough.

West London Borough	'Potential Net Dwellings' Approved on 'Hybrid' schemes as a proportion of total sample
LB Barnet	2%
LB Brent	4%
LB Ealing	4%
LB Harrow	3%
LB Hillingdon	3%
LB Hounslow	4%

Table 5.7: Proportion of Net Residential Gain In Scheme Level Data within the Sample Dataset That Is Identified as 'Hybrid' Development Types (see Annex D)

5.42 It is apparent from the data that 'Hybrid' scheme records comprise a relatively small but consistent component of the overall sample. Such records are unlikely to have a significant impact in terms of skewing an overall understanding of past trends. However, it remains important that they have not specifically been recognised as a characteristic of development on small sites. Overlooking the characteristics of 'Hybrid' schemes illustrates one component that has not been factored in to fully assessing the different approaches to delivering 'small sites'. Schemes with these characteristics may not compare closely with the proportion of existing housing stock (i.e. 1% per annum) that would be estimated to come forward as part of the 'modelled' small sites targets.

5.43 The information in Annex D does not specifically indicate that the incidence of approved 'Hybrid' schemes (as recorded by the LDD) has noticeably increased in recent years. It is, however, not necessarily the case that the overall characteristics of a more complex pattern of development on a given 'small site' will lead to approved 'scheme level' records with 'Hybrid' characteristics. Changes to the planning system such as increased allowances for Permitted Development in principle encourage more varied patterns of development, but to comply with relevant legislation will not indicate multiple development types in a single application.

5.44 For example, if development is delivered across multiple planning permissions (i.e. separate applications for Change of Use of existing premises and subsequently an application 'Extension' to add additional storeys) then neither would ordinarily be recorded as a 'Hybrid'.

5.45 In principle this would support the overall view that the GLA 2017 SHLAA should at least in principle acknowledge the wider implications of the 'Hybrid' classification in distinguishing between measures of *capacity* and the relationship with delivery.

5.46 Having assessed the characteristics of 'Hybrid' schemes we would highlight that they typically relate to examples involving a variety of existing land uses. Generally speaking we would not suggest that examples of 'Hybrid' development have been included within the GLA's sample used to inform 'gross growth factors' set out at Paragraphs 6.26 of the GLA SHLAA 2017. This is because these samples use 'scheme-level' data relating specifically to examples where the existing land use is identified as 'residential'.

5.47 It should also be noted that whether a scheme is picked up as a 'Hybrid' will be dependent on data quality and the approach to data entry.

Multiple Scheme Records Arising from Successive Developments

5.48 One cross-cutting element of indicators identified from processing data relates to how the overall development of a site is achieved. This deals with nature of unique addresses where multiple schemes are identified. It aims to reflect that more than one development type may be brought forward as part of a wider range of ambitions for development over different phases. This is more likely for the characteristics of some sites than others.

5.49 Our findings demonstrate that for certain development types (in-particular 'Extensions') the proportion of scheme records on unique addresses with multiple entries is much higher. This logically reflects that 'Extensions' may typically be in addition to other alterations or redevelopment elsewhere on a site. The proportion of 'Extension' schemes that represent multiple stages of activity on a single site is much higher than their overall contribution to the sample dataset (typically only 6-10% of all records).

5.50 The pattern is more varied on schemes seeking 'Change of Use' and 'New Build'. The number of records that form part of sites with evidence of multiple schemes is generally similar to the representation of these development types within the overall sample. However, findings fluctuate between individual boroughs. In some cases, particularly for 'Change of Use', there is generally a slightly higher proportion of cases recorded as 'multiple scheme' records than the sample total. This may reflect the relationship with other development types such as extensions.

5.51 Schemes for 'Conversion' make up a high proportion of the total sample size but are less common as a 'development type' occurring on examples of 'multiple scheme' records. This indicates that such examples are more likely to be discrete in nature, offering opportunities at a single existing residential property with more limited additional avenues to development. However, even with this broad finding around 20% of total scheme records for 'conversion' development exist alongside other

entries for the same address. This will partly capture instances of 'Lapsed' and 'Superseded' schemes prior to later development on the same address. It may also indicate some examples of 'conversion' alongside other development types.

5.52 Another implication of this finding is that delivery over multiple scheme records (and hence applications) will negate the overall importance and incidence of 'Hybrid' records. Despite it being feasible that a more complex proposal could have delivered certain outcomes, development over several phases will mean monitoring data reflect separate development types.

6. Findings on The Development Process

This section provides a more detailed analysis based on what London Development Database records are able to reveal in terms of the development process on small sites. It deals with elements highlighted in the Critique such as a need to understand the timescales for development and the 'implementation rate' for consents obtained for development on 'small sites'

Overview

6.1 The purpose and objective of this section is to highlight that our analysis of delivery trends goes substantially beyond the position of reported completions in a given year or over a given period. This is considered to provide a more representative basis against which to show that data can more clearly confirm some of the issues identified within the Critique. We adopt the position that details of completions achieved, irrespective of their characteristics, are unlikely to provide a full understanding of the development process. This is certainly likely to be the case where factors affect development timescales, or the features of development reflect multiple applications on a site. These are elements we know can be obtained from our sample.

6.2 This section is therefore key to understanding the differences between the GLA 2017 SHLAA evidence as a measure of 'capacity', and the prospects for achieving the delivery of the proposed targets for 'small sites' in practice.

Sample Findings on Implementation

6.3 The broad trends in activity indicated by our sample highlight that 'approvals' data is likely to reveal more information on the development process than suggested by completions data alone. The proportion of 'potential' net gain approved and actually translated in to completions is significantly below 100%. The reasons for this can be identified using the 'current status' of applications recorded in the London Development Database.

6.4 Annex C sets out, for each constituent borough, the 'current' status of all schemes 'approved' in the sample. We have taken two ranges – FY2004 to FY2017 (the full series) and FY2004 to FY2015 (with records up to 31 March 2016).

6.5 The period covering FY 2004 – 2015 provides a more appropriate timescale over which to compare the current status of applications permitted between these two years. This compares more closely with the evidence base for the GLA SHLAA and

importantly allows a period to allow for typical implementation of consented schemes. This generally provides a clearer indication of the final outcome for any given scheme.

6.6 A summary position for each of the constituent boroughs is shown in Table 6.1 below (for the FY2004 to FY2015 period).

	% of Potential Net Gain Approved FY2004-15		
	Completed	**Lapsed**	**Superseded**
LB Barnet	52.1%	15.5%	17.8%
LB Brent	61.2%	12.0%	18.3%
LB Ealing	67.6%	11.8%	13.0%
LB Harrow	62.4%	15.8%	17.2%
LB Hillingdon	67.7%	10.1%	13.2%
LB Hounslow	60.2%	18.8%	5.9%

Table 6.1: Proportion of Net Residential Gain Approved 1 April 2004 and 31 March 2016 by Current Application Status at July 2018

6.7 The picture across West London is remarkably consistent in terms of the proportion of net potential gain over this period now with a recorded status as 'completed'. This proportion does not exceed 70% of approved schemes in any individual borough. The sample also reveals consistent findings on how quickly applications tend to progress to one of the three statuses listed above. Only around 5 to 15% of supply approved to 31 March 2016 is still listed as 'submitted' or 'under construction'. At the point of our sample (i.e. July 2018 – around two years after the last 'approvals' included in the series) the vast majority of schemes are either complete or can otherwise not yield completions in future years.

6.8 The main importance of the findings is that between **around 25% to 35% of potential net gain actually approved does not proceed to completion** under the details of the recorded scheme. This equates to around one quarter of potential net gain that have either Lapsed or been Superseded by other applications.

6.9 This echoes findings and concerns in the Part A Critique regarding the lower rate of implementation on 'small sites' schemes. The 'implementation rate' is higher than the rate of 47% estimated in the 2009 SHLAA for completion of approvals between 2000 and 2003 (see Paragraph 6.26 of the Critique). Nonetheless, much higher allowance is needed than the notional figure for 'lapse rates' that might typically be applied as part of development monitoring procedures (sometimes only 3-5%).

6.10 There are clear implications of these findings in terms of any forecast approach to identify the 'modelled' targets for development on 'small sites' that relies on evidence providing a measure of capacity only. This is a key concern with the GLA 2017 SHLAA, where evidence does not consider a wider sample of application data to assess implementation rates or the life-cycle of different schemes and sites.

Findings by Development Type

6.11 Given the potential importance of these findings we have identified a need to provide a finer degree of detail in terms of the implementation rate of applications approved by development type. This can help to illustrate how closely issues with implementation relate to the assumptions informing draft Policy H2 in terms of development anticipated through the *presumption in favour of small housing developments*.

6.12 These findings are set out in tables for each constituent borough at Annex C. The relevant tables record the total potential net residential gain approved as well as the 'count' of scheme references contributing to the total. This is necessary to reflect that certain development types (e.g. 'Conversion') can generate a large amount of application activity relative to the net residential gain associated with development. The only applications shown are those with a 'current status' as Lapsed or Superseded. In terms of comparing the evidence of a measure of *capacity* relied upon to inform 'small sites' modelling assumptions in the GLA 2017 SHLAA it is considered that the proportion of actual schemes 'lapsed' or 'superseded' by the count of applications is more significant.

6.13 Table 6.2 summarises the outcome for each constituent borough, showing the proportion of 'Lapsed' or 'Superseded' schemes as the total sample size falling under these classifications.

	Change of use	Conversion	Extension	New Build
LB Barnet	10.1%	26.8%	7.8%	55.2%
LB Brent	18.8%	35.2%	11.6%	34.3%
LB Ealing	18.9%	34.8%	6.4%	39.9%
LB Harrow	15.8%	38.8%	5.3%	40.1%
LB Hillingdon	13.0%	13.0%	1.4%	72.5%
LB Hounslow	24.6%	15.6%	10.3%	49.6%

Table 6.2: Proportion of Approved Schemes Within the Sample Dataset (by Count of Records) Currently Recorded as 'Lapsed' or 'Superseded' by Development Type (see Annex C)

6.14 A significant proportion of 'Lapsed' and 'Superseded' schemes comprise those under the 'Conversion' and 'New Build' development types. Exceptions to this are LB Hillingdon and LB Hounslow and are likely to reflect the lower overall proportion of activity through 'conversions'. Activity is more concentrated in smaller schemes for 'new build' development (which is likely to include examples of 'Garden Land' development or replacement of existing dwellings). A very high proportion of 'Lapsed' and 'Superseded' examples arise from this development type.

6.15 Whilst Annex C confirms that schemes for 'Change of Use' contribute a higher proportion of potential units on unimplemented schemes, these schemes tend to be individually larger in nature. The higher proportion of 'conversion' (and to a lesser extent 'new build') schemes has more specific implications for the robustness of the GLA 2017 SHLAA. It indicates that of all the examples of capacity brought forward a large proportion stalls within the development process. These examples are subject to further analysis in subsequent sections in terms of the impact on development timescales and examples of activity through multiple schemes at a single address.

Multiple Scheme Records Arising from Successive Applications

6.16 A second, cross-cutting theme for analysis enables us to illustrate the relationship between implementation rates and 'multiple scheme' records by development type, based on the current status of applications. The benefit of this is it allows understanding of the proportion of the total 'Lapsed' or 'Superseded' records by development type where other schemes can also be identified on the same site.

6.17 This would generally indicate that alternative proposals have been put forward, which may extend development timescales, but may indicate potential capacity remains in the pipeline or has been delivered under an alternative proposal. The results in Table 6.3 the overall count of 'Lapsed' or 'Superseded' schemes within the sample for individual boroughs and the proportion of records with this status that can be matched to 'multiple scheme' records.

		Change of use	Conversion	Extension	New Build
LB Barnet	**Sample Size**	109	288	84	593
	% on 'Multiple' Record Addresses	57.8%	45.8%	60.7%	66.6%
LB Brent	**Sample Size**	68	127	42	124
	% on 'Multiple' Record Addresses	41.2%	22.0%	40.5%	60.5%
LB Ealing	**Sample Size**	104	191	35	219
	% on 'Multiple' Record Addresses	47.1%	49.7%	51.4%	53.4%
LB Harrow	**Sample Size**	71	174	24	180
	% on 'Multiple' Record Addresses	33.8%	31.6%	50.0%	46.7%
LB Hillingdon	**Sample Size**	55	55	6	306
	% on 'Multiple' Record Addresses	74.5%	34.5%	50.0%	74.8%
LB Hounslow	**Sample Size**	55	35	23	111
	% on 'Multiple' Record Addresses	41.8%	48.6%	47.8%	49.5%

Table 6.3: The Proportion of 'Lapsed' and 'Superseded' Records by Development Type That Exist on Unique Addresses 'Multiple Scheme' Records Identified (using data from Annex C)

6.18 The data indicates that for all development types where 'Lapsed' or 'Superseded' schemes are recorded there is a strong prospect of alternative applications also connected to the site being included within the LDD. Revision and replacement of schemes therefore appears to be a significant aspect of the development process and aligns with specific factors not captured by the GLA 2017 SHLAA methodology that are highlighted within the Part A Critique.

6.19 The 'New Build' development type suggests a slightly higher proportion of specific sites where at least one scheme has either 'Lapsed' or been 'Superseded' but other scheme records can also be matched. This suggests a greater propensity to amend or revisit proposals or address delays to previous ambitions for development. The significance of this is emphasised because this development type also generates higher overall total number of records that do not proceed to implementation.

6.20 For the 'Conversion' development type there is some indication that a slightly lower proportion of 'Lapsed' or 'Superseded' schemes can be matched to alternative application proposals. This might suggest that in some cases where an initial consent is unimplemented it is not revised or brought forward again, meaning delivery does not progress at that site and there may be substantial barriers to development. This trend was strongest in LB Brent as well as LB Harrow and LB Hillingdon. However, a substantial number of 'conversion' schemes do support revisions or alternative proposals.

6.21 It should be noted that these findings do not detract from the point there may nonetheless have been more than one unimplemented scheme at a specific site, or that other proposals might fall under a different development type (for example original proposals for conversion might have been pursued as an alternative 'new build' demolition and replacement).

6.22 Notwithstanding these high proportions the remainder of schemes records listed as 'Lapsed' or 'Superseded' therefore comprise the only LDD entry for the relevant Unique Address details. This means that typically between 40-50% of all unimplemented schemes cannot be matched to other information in the LDD. It cannot currently be suggested that they form part of the future partial pipeline or that alternative schemes have otherwise been completed. Whilst it may be the case that subsequent revisions or alternative proposals will emerge this nevertheless may have significant implications for development timescales or the nature of development that may ultimately come forward.

Timescales for Development

6.23 One key element of the findings on trends in delivery is that the timescales for development might understandably be affected by different patterns of activity. This is a predictable consequence depending on whether a higher or lower proportion of schemes granted permission are actually implemented. The main resulting implications for the targets for development on 'small sites' in draft Policy H2 are likely to relate to their achievability within the ten-year horizon, also taking account of the existing committed pipeline for development. This brings together a number of potential factors within the development process, including areas identified by the Part A Critique that do not form part of the GLA 2017 SHLAA methodology.

6.24 There is scope for the resulting conclusions to align with insight gained from stakeholder engagement and to help explain trends in wider development monitoring such as the 'gap' between the pipeline of approved development and recorded net gains through completions.

6.25 The London Development Database contains the necessary information to calculate timescales for development with no further cleansing of data required. However, we are dependent on the accuracy of recorded dates for permission and completions as well as the other characteristics of development that have been recorded. One particular feature is that where data on completions is gathered from physical monitoring of sites it is more likely to be recorded at the end of the monitoring year (i.e. around 31 March) whereas actual completions may pre-date this point by several months. This will not necessarily be the case for all records, as local planning authorities are able to make educated estimates of completions dates that may have occurred in earlier months (i.e. where there is clear evidence a property has been occupied for some time). Equally, however, the physical capacity of officers to actual visit all small sites with permission in any given year can create separate issues in the regular monitoring of activity, albeit any annual discrepancy is likely to even out over time. Where the constituent boroughs use other secondary data sources such as Council Tax records or Building Control data evidence of completions may actually be received on a more regular and time-specific basis.

6.26 It is also important to note that the comparison of timescales for development will not necessarily be accurate when comparing only that data for a single scheme entered into the Development Database. Such analysis would inevitably overlook other potential instances of applications on the same site where schemes have previously lapsed or been superseded prior to a first completion being recorded.

6.27 Annex E sets out detailed results from an analysis of development timescales. Table 6.4 below summarises the average completion date (in months) between the grant of permission and recorded completion date by 'development type' and for each constituent borough. This deals only with records unique addresses with activity recorded on a single scheme.

	Average Time Between Approval and Completion Date for Schemes with a Single Record Matched to a Given Unique Address			
	Change of use	**Conversion**	**Extension**	**New Build**
LB Barnet	16	14	22	26
LB Brent	17	13	24	27
LB Ealing	16	14	22	26
LB Harrow	16	14	24	27
LB Hillingdon	18	19	32	26
LB Hounslow	20	18	29	28
WLB Total	17.1	15.1	24.9	26.2

Table 6.4: Average Time Between Approval and Completion Date for Schemes with a Single Record Matched to a Given Unique Address (in Months) (see Annex E)

6.28 The trends across each constituent borough are very consistent, indicating that on average it takes around 26 months from approval to delivery of 'new build' development on small sites. This is the longest timeframe for any category. It should be noted that this timescale only begins once planning permission is in place and will not account for preparation and determination of proposals prior to this point. The findings correspond with the higher rate of unimplemented consent on schemes of the type, plus the development process is likely to be more complex where it might involve the demolition of existing structures prior to the delivery of new built form. This is significant given the reliance on 'new build' developments proposing up to ten units to inform 'small site' modelling assumptions in the GLA 2017 SHLAA.

6.29 The longer horizon for the 'Extension' development type is also significant. This appears to be the case even (as shown in the table above) where the 'extension' scheme is the only application recorded on a given unique address. In some cases, timescales may be affected by the need to work around existing occupiers and ensure vacant possession of the premises for additional development. In terms of the assumptions informing draft Policy H2 and the evidence in the GLA SHLAA 2017 this is significant because the SHLAA dataset treats 'extension' schemes as a 'new build' typology. This strongly indicates that increased allowances for development timescales also need to be acknowledged for this type of development.

6.30 Knowledge of the difference between potential supply found in the 'partial pipeline' for small 'new build' development confirms this is significantly below the *capacity* assumed in the forecast approach to generating targets for 'small sites'. It is also the

case sufficient timescales should be allowed before anticipating actual delivery of new schemes approved between now and the start of proposed period for 'small sites' targets from 2019 to 2029, as well as other approvals over the plan period.

6.31 The timescale for development of 'Change of Use' and 'Conversion' typologies is notably lower. This indicates generally fewer barriers to development (including matters such as vacation of premises by existing occupiers). For Change of Use schemes this explains to some degree why the increased pipeline of approved supply has tended to translate fairly quickly into increased completions. In some cases, where Change of Use is enabled under rights for Permitted Development, timescales might be shortened as part of seeking to comply with the end-dates contained within previous iterations of relevant legislation as well as expedited requirements from development management (i.e. more limited scope for imposing conditions to be discharged).

6.32 In the case of 'Conversion' schemes these may be made simpler by the lack of change in land use or need for substantial built development. It should also be noted that we have identified that within the sample there are application types such as 'Certificates of Lawfulness for Existing Use or Development' that may render the approval date and date of completion as identical and thus skew timescales.

Timescales for Completions Delivered on Multiple Scheme Records

6.33 As indicated, we consider it necessary to separately illustrate the overall horizon for development where 'multiple schemes' can be associated with the same unique address. For sites on which multiple applications have been identified we have undertaken separate analysis to demonstrate the timescale between 'first permission' and 'first completion'. By definition first completions may well not be recorded from the first application. We have also assessed those examples where more than one scheme has yielded completions on what we have identified as a location with 'multiple schemes'. In these instances, the dates of first and most recent completions have been recorded; it should be noted that completions might span more than one development type and we have not separately identified whether further outstanding capacity exists on the same site.

6.34 Annex E demonstrates that within the overall sample the impact of net completions actually recorded on sites with multiple records of applications is a substantial component of overall trends in delivery. Allowing for recognition of this within the development process is therefore an important part of understanding activity on 'small sites' but does not appear to have been considered in the GLA 2017 SHLAA, which treats all unit-level completions on qualifying sites in the same manner. This is irrespective of their relationship with other sites or applications. Table 6.5 below summarises key findings in terms of total net completions recorded on sites where there have been 'multiple schemes' and the average development timescales for different permutations of where multiple records are logged.

	Multiple Completed Schemes		One Completed Scheme	Net Residential Gain (Completed Schemes Only)
	Average of Time Taken - Permission to First Completed Scheme (Months)	Average of Time Taken - Permission to Most Recent Completed Scheme	Average of Time Taken - Permission to First Completed Scheme (Months)	
LB Barnet	22.3	56.8	48.9	1,423
LB Brent	22	44.5	44.8	730
LB Ealing	20	52.2	45	1,128
LB Harrow	18.3	46.3	49.1	648
LB Hillingdon	43.4	64.2	46.2	891
LB Hounslow	21.3	41	50.3	631

Table 6.5: Average Development Timescales and Total Net Residential Gain (Completed) For Unique Addresses with Multiple Scheme Records Identified (in Months)

6.35 It should be noted that the analysis above is not differentiated by development type. For some specific addresses the characteristics covered by analysis will mean more than one development type is covered by the applications considered. The picture presented is an average and some regard should be had to the differences in development timescales noted when only one application is recorded on a given site (i.e. schemes for 'conversion' generally being completed more quickly). It may well be the case that where the first scheme completed on a site is for a development type with a typically longer horizon (e.g. 'new build') a longer period is likely to elapse before completions are delivered from one or more scheme. The results for LB Hillingdon, which past trends indicate witnesses a greater overall proportion of application activity for 'new build' schemes, are likely to reflect this observation.

6.36 The findings are sensible that in terms of where completions have been delivered over multiple schemes the timescales for first completions being achieved are generally shorter than where multiple scheme-level records exist but only one has proceeded to completion. Examples of multiple completions are more likely to indicate that a comprehensive range of development options has been pursued and explored, potentially starting with more minor components such as conversion of existing premises. Where only one completion has been achieved this may reflect barriers to development for one specific proposal, such as viability constraints surrounding the demolition and replacement of existing buildings.

6.37 Not shown within the table above, but detailed in Annex C, is also a noticeable count of scheme-level records where multiple applications have been recorded but to-date there have been no completed schemes recorded on the address concerned. Whilst there may be outstanding schemes in the pipeline in some cases, there will be other examples where despite several attempts to bring forward proposals this has not materialised to completions for whatever reason.

6.38 There are significant differences in the way that large sites and small sites are monitored and delivered. There is also substantial diversity in the characteristics of 'large' sites that might affect delivery patterns. This makes it difficult to directly compare the effect of the longer timescales for development on 'small sites' that are observed when multiple application records exist on a single site. It is common for very large sites to be reflected by only a single completed record at 'scheme' level, although the start of development and date of first permission may be recorded under earlier entries (e.g. an Outline permission listed as 'Superseded' upon Approval of Reserved Matters).

6.39 This can understandably result in observed timescales between the start of development and completion of the record exceeding timescales for 'small sites'. However, key indicators including the overall scale of the scheme should be noted. This means that unit-level reporting is likely to record some units being delivered year-on-year in the course of development to achieve the scheme total, particularly once the scheme is recorded as 'Started'.

6.40 Conversely, the ability of the LDD to record 'multiple records' and multiple completed schemes is a trend focused much more on 'small sites'. This makes it more likely that the relevant considerations being reflected are longer-term aspirations to deliver different elements of development and the impact of instances of unimplemented consent. In these circumstances housing delivery is unlikely to be sustained over the whole timeframe. Examples of the scale of development and timeframes for completing 'large site' for LB Ealing and LB Hillingdon are provided below in Table 6.6. This confirms the relatively limited instances of multiple records and significantly higher volumes of completions but broadly similar timeframes to those in Table 6.5 from permission to completion of the most recent scheme

	Multiple Completed Schemes		One Completed Scheme	
	Average of Time Taken - Permission to First Completed Scheme (Months)	Average of Time Taken - Permission to Most Recent Completed Scheme	Average of Time Taken - Permission to First Completed Scheme (Months)	Net Residential Gain (Completed Schemes Only)
LB Ealing				
250+ Units	N/A	N/A	28.5	987
101-250 Units	N/A	N/A	42.3	2,698
25-100 Units	N/A	N/A	26.3	1,020
LB Hillingdon				
100+ Units	56.2	95.2	57.9	3,393
25-100 Units	23.75	38.5	34.6	1,199

Table 6.6: Average Development Timescales and Total Net Residential Gain (Completed) For 'Large Site' Records (over 0.25ha) proposing over 25 units (in Months)

6.41 More information on the overall characteristics of records approved on 'large sites' is considered in Section 9.

Relationships Between Application Type and Timescales

6.42 It is also helpful to briefly further explore that the findings regarding analysis of the development process are multi-variate in nature so there may be a number of factors affecting the outcomes observed. It is an acknowledged feature of recent patterns of development (in-particular on 'small sites') that rights under Permitted Development have facilitated the uplift in activity. We need to be mindful of this within our sample and recognise that development with these characteristics may have associated effects on timescales.

6.43 Table 6.6 uses three sample boroughs to set out the relative proportion of Change of Use Schemes by 'classes' of Permitted Development Rights compared to schemes with Full Planning Permission. Also shown is the average completion time (in months) for the respective groupings.

	Count of Application References	Sum of Net Residential Gain Completed	Average Time Taken – Permission to Completion
LB Barnet	**234**	**911**	**17**
Full	159	345	17
Prior Approval (Class O - formerly J)	69	548	18
Prior Approval (Class P)	1	11	11
LB Ealing	**355**	**975**	**16**
Full	287	639	17
Prior Approval (Class M - formerly IA)	2	2	16
Prior Approval (Class O - formerly J)	38	272	25
LB Hounslow	**171**	**749**	**19**
Full	127	278	20
Prior Approval (Class G - formerly F)	1	1	11
Prior Approval (Class M - formerly IA)	2	2	8
Prior Approval (Class O - formerly J)	40	464	17

Table 6.7: Indicator of Average Time from Permission to Completion (Months) For Change of Use Development by Permission Type (Selection of Sample Boroughs)

6.44 The relative importance of schemes for office-to-residential conversion under Class O Permitted Development Rights is clear. This type of activity comprises 62% of all completed Change of Use schemes in LB Hounslow and a similar proportion (60%) in LB Barnet. This is boosted by the fact such schemes typically generate a higher average net gain in units per application. Contrary to some expectations it is not, however, the case that schemes through Permitted Development necessarily achieve completions any quicker than formal planning application routes. This may relate to the physical timescales for development as well as the ability to break existing leases. Prior Approval application types have a small effect in reducing average delivery times in LB Hounslow, but the opposite impact is seen in LBs Barnet and Ealing. This may partly explain the growing 'gap' between completions and approvals on 'small sites' in recent years.

6.45 However, this is not the only indicator of trends by specific types of application affecting observations on delivery and development trends. The London Development Database records a diverse range of schemes, including a variety of examples that will not be subject to the formal requirements of the development management process. One area of potential significance, in relation to the measures of draft Policy H2, are examples of schemes for residential development recognised through Certificates of Lawfulness for Existing Use of Development ('CLEUD'). The implications for this application type are potentially significant in terms of both timescales and because such examples provide minimal means of control over development standards or compliance with other planning conditions.

6.46 The exact representation of these trends within the overall sample is likely to vary between constituent boroughs for a number of reasons, taking account of factors such as trends in the use of existing property and the approach individual authorities take to regularising breaches of planning control. We have sought to illustrate the impact and potential outcomes with a number of sample boroughs. Table 6.7 sets out all 'completed' schemes for 'conversion' on small sites by application type, noting the count of recorded schemes, associated net gain in dwellings and average time taken to complete development.

	Count of Application References	**Sum of Net Residential Gain Completed**	**Average Time Taken – Permission to Completion**
LB Barnet	**967**	**1367**	**14.1**
Full Permission	896	1249	15.1
Outline Permission	2	16	47
'CLEUD'	67	104	0
LB Ealing	**968**	**1322**	**12.2**
Full Permission	752	912	15.7
'CLEUD'	215	411	0
LB Hounslow	**188**	**210**	**18.1**
Full Permission	156	155	21.8
'CLEUD'	32	55	0

Table 6.8: Indicator of Average Time from Permission to Completion (Months) For Conversion Development by Permission Type (Selection of Sample Boroughs)

6.47 For the sample boroughs selected there is a noticeable proportion of conversion activity arising through 'CLEUD' applications. The variation between boroughs is also significant, with LB Ealing specifically standing out in the sample because around 30% of all net completions through conversion have involved 'CLEUD' schemes.

6.48 Because these have identical approval and completion dates it can be observed that the timescales for completion of 'conversion' schemes with Full Planning Permission is in-fact longer than indicated by the overall sample. This is particularly evident in LB Hounslow and LB Ealing.

6.49 It is not the case that draft Policy H2 seeks to support reduced control over development on 'small sites'. To this extent, the observations on trends by application type highlighted above will not be encouraged by the proposed approach. The findings are of greater significance in terms of illustrating a more substantial gap between the assumptions of *capacity* used to inform 'small site' modelling assumptions and the consistent experience of delivery as part of past trends.

6.50 Indirectly, however, the greater emphasis towards development on 'small sites' as a proportion of overall targets may continue to facilitate examples of activity outside of normal planning control and placing pressure on other areas of the system such as Planning Enforcement. These potential associated impacts do not appear to have been considered in the evidence base for draft Policy H2 as part of a wider understanding of the development process on small sites.

Initial Conclusions on the Development Process

6.51 Substantial complexity in how schemes on 'small sites' are actually delivered has been highlighted by this analysis. It should be noted that our sample data is extensive and covers a long time-series. Whilst there are some annual fluctuations in findings and some macro-level impacts of external factors such as the recession many of the trends in implementation rate and development timescales are consistent over time. The findings indicate a fundamental incompatibility – in terms of the reliability of supply and relationship with how development consistently occurs – with the limited evidence for a 'forecast' approach in the draft London Plan.

6.52 It is noted that Part BA of proposed Policy H3 in the draft London Plan (with proposed Minor Modifications) indicates that *"the relative contribution from large and small sites may fluctuate across the target period"*. This could be taken as providing some allowance for change in how the development process operates as well as time to allow additional capacity to be identified. Our findings strongly suggest that any such flexibility will be inadequate compared to issues with the approach to measuring capacity.

6.53 Fundamental differences in the 'stock' of approvals required and 'flow' of delivery achieved appear to be a sustained element of the development process on 'small sites'. These aspects are implicitly accepted (to a greater or lesser extent) in any approach projecting forward past trends, even if the degree of understanding is limited. Without clear evidence the same aspects appear fundamentally overlooked by the forecast approach to 'modelled' elements of the 'small sites' target and, as a result, can be regarded as unsound in terms of being consistent with national policy.

6.54 A simple way to express this impact is to demonstrate how in-effect the proposed targets for 'small sites' will practically only be capable of delivery over an 8-year period. Even if sufficient supply to provide for the draft targets was approved now, realistically this would take around two years to implement and complete. It would be reasonable to conclude that in the intervening two years the level of supply will broadly follow past trends over the FY2008 to FY2015 period. This would lead to residual requirements for the period 2021/22 to 2028/29 significantly exceeding the average 10-year targets in Table 4.2 of the draft London Plan.

	GLA 2017 SHLAA APPROACH 1 (Annualised FY2008-FY2015 average)	Draft London Plan Small Sites Target (Annual)	DRAFT PLAN 2019/20 to 2028/29 (COL2 * 10)	Delivery Years 1-2 (COL1 *2)	Residual Small Sites Target Years 3-10 (COL 3 – COL 4)	Average Small Sites Target Years 8-10 (COL5 / 8)
COLUMN NO.	**1**	**2**	**3**	**4**	**5**	**6**
Barnet	305	1204	12040	610	11430	1429
Brent	258	1023	10230	516	9714	1214
Ealing	303	1074	10740	606	10134	1267
Harrow	221	965	9650	442	9208	1151
Hillingdon	176	765	7650	352	7298	912
Hounslow	181	680	6800	362	6438	805

Table 6.9: Comparison of GLA HLAA 2017 Small Sites Approach 1 and increased delivery rates required in later years of the plan period of the draft London Plan

6.55 This impact can also be expanded upon further. This is due to differences in approved supply versus actual delivery, taking account of implementation rates. It is unlikely that even if sufficient capacity is approved to deliver the small sites targets, around 30% of these schemes will not proceed to completion as a result of the first permission. For years 3-5 of the 'small sites' target period it would be prudent to conclude only 70% of the proposed target will actually be delivered. Once again, this leaves a residual requirement for the remaining five years (2024/25 to 2028/29) that significantly exceeds the 10-year average.

7. Findings on Detailed Development Characteristics

This section provides the most detailed findings based on a range of more complex analysis of London Development Database records. It seeks to add detail and illustrate the relationship of different characteristics within the development process on 'small sites' and with the proposed approach to draft Policy H2. This provides a more fine-grained indication that a more comprehensive view must be taken on patterns of activity. Analysis is able to compare findings with the specific components of the target for 'small sites' indicated in the draft London Plan. This specifically indicates that a 'modelled capacity-based' approach to forecasting future supply is unlikely to provide reliable estimates in accordance with national policy and guidance.

Framework to Identify Detailed Findings

7.1 The detailed analysis in this section assesses patterns of delivery in two boroughs; LB Brent and LB Hillingdon. Practically, this is due to constraints on the level of detailed reporting considered feasible and the volume of data assessed. However, the two boroughs represent a cross-section of the authorities making up the WLA. The analysis for LB Brent represents the boroughs closest to inner London and LB Hillingdon the more outer London boroughs. Although there are, of course, differences between boroughs, there are many issues which exist similarly in all the authorities. Furthermore, each constituent borough has access to the relevant source data that would allow separate monitoring and reporting of comparable ouputs.

7.2 Generally, we have taken the view that the finer the degree of analysis undertaken the closer the relationship that should be assessed in terms of the development supported by the *presumption in favour of small housing developments*.

7.3 This is as part of the objective of more closely comparing delivery outcomes with the characteristics of development utilised within the GLA 2017 SHLAA as measures of capacity to generate a 'modelled' capacity for development on small sites. Specifically, this means more attention should be focused on schemes proposing 'New Build' development or 'Conversion' of existing residential properties. Furthermore, relevant schemes for finer-grained analysis should focus on those proposing up to 25-units. However, we have found a degree of overlap between development characteristics on small sites leading to a wider recognition on how opportunities are delivered.

Findings on Development Characteristics

7.4 We have sought to add further detail and classification to 'scheme-level' records to provide a greater indication of development characteristics. This does not change the raw LDD data in our sample but applies judgement to details available in the record. As a result, the category we apply for the purposes of analysis may not correspond to the LDD 'development type'. To this extent our approach is similar to the GLA. For example, whereas data entered in to the LDD can sometimes regard schemes such as 'end of terrace' dwellings as 'extension' schemes when these in reality represent new single properties with no material alteration to accommodation in the existing property. They should more correctly be a 'new build' scheme. Furthermore, such examples can also typically be regarded as development on 'garden land'.

7.5 Our conclusion is that this exercise inevitably reveals a varied pattern of results but overall understanding of the characteristics of development is assisted as a result. The more detail that is assessed in terms of the features of a 'scheme' the more likely it is that factors can be identified that indicate a potentially weaker relationship (or potential conflict) with the objectives and measures for development control proposed as part of draft Policy H2. This is potentially significant in terms of whether trends in development closely reflect the presumption in favour of small housing developments.

7.6 The additional detail that can be identified as part of LDD records also provides some indication of key factors that might determine desirable opportunities for development either in terms of scale, location or the outcomes that are achievable. Some of these factors are more strongly represented within the dataset (for example providing extension to existing property as part of residential conversion or refurbishing non-residential uses elsewhere on site). Because these drivers may not be common to all sites this may pose further questions in terms of the assumptions in the GLA 2017 SHLAA informing estimates of the capacity for development without assessing underlying characteristics.

7.7 We briefly indicate a number of key findings from our overall matrix of classifying scheme-level records, taking account of how this affects specific sample boroughs.

Detailed Characteristics for 'New Build' Development

7.8 In terms of typologies this classification provides for a high degree of variety in development outcomes. This has previously been recognised in iterations of the SHLAA, for example, in terms of how development on 'garden land' is classified. We have aimed to take a similar approach whilst paying closer regard to classifying characteristics depending on how they might relate to the activity supported by draft Policy H2.

7.9 Tables 7.1 and 7.2 consider the show that within all sub-categories of 'new build' development there is a mix of schemes in terms of proposed units and the nature of existing uses and buildings on site.

7.10 Schemes accounting for **'Redevelopment or Intensification' of existing units are a relatively small component** (around 13% in LB Brent and 28% in LB Hillingdon where this typology is more common as a proportion of the total). Within this sub-category there are nonetheless examples of schemes proposing more than 10 units and some examples of potentially significant regeneration or redevelopment proposing over 25 units. This reinforces our view on the relatively limited comparison between the *capacity* for this activity assumed in the GLA 2017 SHLAA and experience of actual schemes.

7.11 Delivery occurs across other sub-categories of 'New Build' activity that in principle relate to the typologies expected under draft Policy H2. This includes 'Garden Land' and the redevelopment of outbuildings. However, when these are understood as part of overall trends the contribution to the overall total is less significant.

7.12 In terms of the concentration of activity both LB Brent and LB Hillingdon suggest that redevelopment of non-residential buildings contributes the greatest proportion of activity (41% and 31% respectively). Whilst draft Policy H2 does support this means of 'small site' delivery, the capacity will understandably be constrained by the overall number and availability of non-residential or mixed-use premises potentially suitable for intensification. This sub-category relates less well to the 'modelled' elements of capacity on small sites. Indeed, data suggests the majority of such schemes propose over 10 units and would therefore only be expected to continue in-line with past trends. However, the importance of the contribution to supply from these sources (as a proportion of past trends) may place greater emphasis on the scope for individual boroughs to pro-actively identify further opportunities. Schemes proposing over 25 units would not be captured by the *presumption in favour of small housing developments.*

LB Brent **Schemes Completed and Classified as 'New Build'** **Sum of Net Residential Gain**	**10 or fewer**	**11-25 Units**	**Over 25 Units**	**Total**
Development of Garden Land	126	14	38	**178**
Development of other vacant land including PDL	31	83	143	**257**
Development Replacing Residential Outbuildings	95	20		**115**
Redevelopment including replacement of non-residential buildings or mixed-use	176	310	254	**740**
Redevelopment of existing buildings - Use Class unestablished	23	136	123	**282**
Redevelopment or Intensification of Existing Residential Dwellings	118	35	74	**227**
Total of Activity Types and % Split	569 (32%)	598 (33%)	632 (35%)	**1,799**

Table 7.1: LB Brent - Sum of Net Residential Gain of 'New Build' Development Typologies Sub-Classified by Existing Land use

LB Hillingdon **Schemes Completed and Classified as 'New Build'** **Sum of Net Residential Gain**	**10 or fewer**	**11-25 Units**	**Over 25 Units**	**Total**
Development of Garden Land	279			**279**
Development of other vacant land including PDL	76	53	175	**304**
Development Replacing Residential Outbuildings	69			**69**
Redevelopment including replacement of non-residential buildings or mixed-use	187	319	90	**596**
Redevelopment of existing buildings - Use Class unestablished	13	37		**50**
Redevelopment or Intensification of Existing Residential Dwellings	307	185	42	**534**
Total of Activity Types and % Split	931 (50.8%)	594 (32.4%)	307 (16.8%)	**1832**

Table 7.2: LB Hillingdon - Sum of Net Residential Gain of 'New Build' Development Typologies Sub-Classified by Existing Land use

7.13 One area we have identified is also that the description for 'new build' schemes may not relate solely to residential use. This will not necessarily qualify schemes as 'hybrids' (i.e. because there is no impact on existing non-residential uses as part of the net change in dwellings). However, the ability to make provision for a range of occupiers and activities may determine whether and where development takes place. For these findings we have therefore split records depending on whether they fall within 800m of Station or Town Centre buffers, as shown in table 7.3 below.

Schemes Completed and Classified as 'Conversion' Sum of Net Residential Gain	**LB Brent 800m Station or Town Centre (Yes or No)**		**LB Hillingdon 800m Station or Town Centre (Yes or No)**	
	NO	**YES**	**NO**	**YES**
Includes Retention or Provision of Mixed-Use	10	1024	70	387
No retention or Provision of mixed-use	226	2234	645	799
TOTAL	**236**	**3258**	**715**	**1186**

Table 7.3: Sum of Net Residential Gain of 'New Build' Development Typologies Classified by Proximity to Station or Town Centre Boundaries and Whether Provision is Made for Other Mixed-Uses

7.14 LB Hillingdon exhibits a greater proportion of overall activity outside of relevant 800m buffers due to the geography of the borough. However, a notable feature is that almost all 'new build' schemes incorporating mixed-uses fall inside these geographies. This means that a higher proportion of 'residential-only' new build development relates less well to the measures proposed by draft Policy H2. A similar pattern exists in LB Brent, where around one-third of 'new build' development is also associated with provision for mixed-uses.

7.15 Where sub-categories are considered it is also the case that geographic variation might exist in terms of the opportunities delivered. The significance of findings will depend on how widely a constituent borough's dwelling stock falls within relevant 800m buffers. In LB Hillingdon, for example, around 47% of development on 'Garden Land' and 42% of redevelopment of existing dwellings takes place beyond 800m of a Station or Town Centre. Within the borough, around 52% of housing stock is located outside relevant buffers, broadly following the distribution of recorded schemes. The capacity for development contained within the areas covered by draft Policy H2 may therefore be less substantial than the 'modelled' assumptions.

7.16 Another minor trend identified in the sub-classification of 'New Build' development were records seeking the like-for-like demolition and replacement of existing dwellings. Such activity will potentially impact on the overall capacity for development activity but would not generate any net change in dwelling stock. Such records will overstate activity (in terms of scheme making a positive net contribution to supply) as well as reducing the stock likely to come forward for intensification in future.

7.17 There was a high degree of variation between individual boroughs with 84 such records in LB Hillingdon and only 9 and 16 records respectively in LB Brent and LB Ealing. Local patterns were discussed in our Workshop with Officers as likely to be relatively specific in nature with large areas where such forms of development are unattractive. This nonetheless suggests a potential need for a specific understanding of context not allowed for with the GLA 2017 SHLAA evidence base.

Detailed Characteristics for 'Extension' Schemes and Relationships with Permitted Development Rights

7.18 We have already identified that the GLA 2017 SHLAA does not separately report trends in the 'extension' development type and this activity all forms part of the 'new build' classification within the total level of completions summarised. In principle this does not conflict with the approach to draft Policy H2 that offers broad support for this activity as part of the *presumption in favour of small housing developments*. However, this means that the GLA 2017 SHLAA does not explore the characteristics of 'extension' schemes.

7.19 Fundamentally this establishes a potential issue because small (i.e. proposing fewer than 10 unit) schemes for 'extensions' will be removed from the element of the 'small sites' targets based on past trends and is assumed to be by the 'modelled' component. Although outcomes consistent with 'extension' schemes are supported it is likely that the types of property suitable for this type of scheme may be less common than a 1% 'yield growth factor' assumed from the overall dwelling stock.

7.20 In terms of key characteristics, a number of features of 'extensions' schemes can be illustrated through sample data and a number of caveats noted.

7.21 Firstly, we have already illustrated that providing extensions to existing property is a characteristic of many development types and outcomes but does not necessarily mean this will be recorded as the 'development type' through the LDD. This is because the primary means of a net change in dwelling stock results from another primary change in land use i.e. it is associated within a conversion.

7.22 Secondly, 'scheme-level' data will not necessarily be an accurate reflection of all specific 'units' created even where these are individually a result of the 'extensions' 'development type'. One common type of 'hybrid' scheme is where units are entered separately for the 'extension' and other elements (e.g. Change of Use or Conversion) of a proposal. Where this is the case, the other development types are more typically

applied as the main 'scheme-level' typology, meaning detail on the 'extension' element is lost. The GLA 2017 SHLAA does not recognise 'hybrid' schemes and only uses 'unit-level' data so this distinction will be lost when treated as 'new build'.

7.23 For those examples that retain an 'extensions' typology or have been identified as such by our classifications more direct characteristics can be recorded in terms of the type of changes to property, their location and their relationship to other schemes. For the reasons given it remains the case that the 'extension' typology represents a relatively minor component of development measured through past trends. However, given the proposed approach to draft Policy H2 and the step-change in supply anticipated (including via 'extensions'), relevant characteristics may indicate impacts on the effectiveness of the policy and resulting patterns of development.

7.24 Our sample strongly suggests that 'extension' schemes are more likely to occur on 'multiple scheme' records where more than one application has been recorded. This is likely to be a sensible reflection of further opportunities to optimise development potential on relevant sites. This is indicated in Table 7.4 for a range of sample boroughs; also reflecting that the volume of activity through extensions differs between constituent boroughs.

Schemes Completed and Classified as 'Extension' Sum of Net Residential Gain	**LB Brent**		**LB Hillingdon**		**LB Hounslow**	
Address with Multiple Schemes	NO	YES	NO	YES	NO	YES
Combination of Extensions	52	23	2		48	6
Rear or side extensions only	41	2		6	6	1
Upward extensions only	148	48	32	25	72	97
Total	**241**	**73**	**34**	**31**	**126**	**104**
% on Addresses with Multiple Schemes	**23%**		**48%**		**45%**	

Table 7.4: Sum of Net Residential Gain of 'Extension' Development Typologies Classified by Type of Extensions Provided and Whether Multiple Schemes are Recorded on the Same Unique Address

7.25 It is also possible to identify cases where the basis for 'multiple scheme' records including the 'extension' category illustrate that rights for Permitted Development have been taken up elsewhere on part of the same site or building. Such trends are likely to be in their relative infancy compared to our sample period given the introduction of changes from around 2013 onwards. For example, this pattern affects approximately 35% of the potential net gain from 'extensions' completed, submitted or approved in LB Hounslow but a lower proportion in other constituent boroughs.

7.26 Typical timescales for development may mean that opportunities such as provision of additional storeys are still being considered. The GLA 2017 SHLAA omits activity under Permitted Development from past trends and there may be less certainty over the future extent of these provisions. It may therefore be the case that the actual opportunities to provide extensions to sites also benefiting from Change of Use outside of normal planning controls will be reduced. This would exaggerate differences between factors affecting delivery and a simple metric of capacity for development on 'small sites'.

7.27 Understanding the geographic distribution of 'extension' schemes is more likely to be a multi-variate relationship. This could take account of numerous factors including local character and the floor-to-area ratio of property determining the appropriateness of schemes for 'upward' or 'outward' extension. Given our findings, trends may also be determined by specific concentrations of mixed and non-residential uses. The drivers of development may therefore relate less well to a large proportion of properties within 800m of relevant Station and Town Centre buffers, particularly where predominantly residential and suburban in character.

7.28 Table 7.5 below uses an example from LB Hounslow to show the total potential net gain on schemes 'submitted', 'started' or 'completed' inside relevant 800m Town Centre boundaries. This is compared with the specific distribution of the 'extension' sub-category. Activity within these buffers captures a high proportion of activity with a reasonably broad distribution. However, in relation to 'extensions', over 68% of recorded schemes are within Hounslow Town Centre ('Metropolitan'), with some District Centres recording no schemes at all. This could be a function of their character or where the actual town centre area falls outside the constituent borough, but this provides a more practical reflection of the actual opportunities for development.

Sum of Potential Net Gain 'Submitted', 'Started' or 'Completed' within 800m Town Centre Buffers Town Centre Name[2]	**All Development Types**	**Distribution Within 800m Town Centre Buffers by Individual Centre**	**'Extension' Development Types**	**Distribution Within 800m Town Centre Buffers by Individual Centre ('Extension' Only)**
Brentford	539	20%	22	16%
Feltham High Street	307	11%	7	5%
Twickenham	2	0%	2	1%
Whitton	26	1%		0%
Chiswick	530	19%	12	9%
Hammersmith	16	1%	1	1%
Hounslow	1341	49%	97	69%
Total	**2762**		**141**	

Table 7.5: Comparison of Net Residential Gain 'Completed', 'Started' or 'Submitted' within LB Hounslow 800m Town Centre Buffers by Overall Total and 'Extension' Development Types

7.29 It is also worth noting that by implication these results also give a proxy for the proportion of activity through 'extensions' not falling with 800m Town Centre buffers. Analysis by 'development type' shows 328 units' potential net gain approved and either 'Started, Completed or Submitted' over the sample period. Significantly, Hounslow Town Centre therefore contains approximately 30% of total activity yet other Centres a much smaller fraction. For 'All Development Types' Town Centre locations are a more significant indicator of where development takes place (around 64% of all records 'Submitted, Started or Completed' can be matched inside relevant buffers).

7.30 Around 60% of 'Extensions' activity is likely to be outside of Town Centre buffers (though could be close to stations in non-centre locations). Part D(3) of draft Policy H2 does indicate that the *presumption in favour of small housing developments* can support upward extension of flats and non-residential buildings irrespective of their spatial relationship to relevant buffers, though for residential dwellinghouses proposals should accord with these locations. Past trends provide evidence of a relatively disparate pattern of limited capacity for development, with only some individual instances of where higher levels of activity might be concentrated.

[2] List of Town Centres based on all intersections between relevant 800m buffers and records from LDD sample. This may include designated Town Centres that are partially or fully located outside of LB Hounslow

Schemes for Residential Conversion – Existing Unit Type and Provision of Extensions

7.31 It is a key aspect of issues highlighted in the Critique that the constituent boroughs do not consider it robust that the focus of 'small site' modelling assumptions uses only the existing stock of *houses* as a measure of capacity for the *forecast* approach. This is not considered to represent trends in the type of site consistently becoming available. It is subsequently a feature of the *proposed presumption in favour of small housing developments* that it does not provide explicit support for the sub-division and conversion of existing flatted property. The constituent boroughs feel the pressure on dwellings stock (covering a range of dimensions) means that proposals affecting existing flats are nonetheless an important component of overall trends in development.

7.32 It is believed to be the case that there are numerous examples of flatted properties across London potentially suitable for sub-division and conversion as part of development. It is also the case that such property might exist alongside other development types – for example flats above shops or existing alongside other non-residential uses. Other opportunities within the planning system, such as seeking opportunities for extensions to existing property, may provide the means of sub-dividing flatted property.

7.33 However, it should also be acknowledged that where existing flatted property is affected as part of proposals the outcome is likely to be a lower net conversion factor in terms of the potential net gain in units. In some cases, a net loss may also arise – most simply termed a **'de-conversion'** such as when a property is returned to a single dwellinghouse.

7.34 Our methodology for delivery analysis provides some means of assessing this hypothesis. Tables 7.6 and 7.7 deal with completed schemes for residential conversion on schemes proposing up to ten units. This seeks to maintain consistency with the *presumption in favour of small housing developments* and the 'modelled approach' to generate 'small sites' housing targets. Where a match can be identified with 'unit-level' data to confirm the type of existing property affected by proposals this is used to sub-divide results. The findings are presented in terms of a proportion of total scheme records and to net gain associated with the sub-groups. The difference between these two measures is important to illustrate that existing property type may be a key indicator of the gross conversion factor associated with different schemes.

	Total Count of Conversion Schemes	Conversion Schemes - Existing Flat or Apartment	Proportion of Schemes Affecting Existing Flat or Apartment	Total Estimate of Flatted Housing Stock Within Borough (Count and Percentage)
LB Barnet	871	255	29.3%	60,137 (43%)
LB Brent	576	292	50.7%	59,551 (53%)
LB Ealing	872	302	34.6%	57,569 (46%)
LB Harrow	633	120	19.0%	26,521 (31%)
LB Hillingdon	164	26	15.9%	27,951 (27%)
LB Hounslow	164	67	40.9%	41,764 (43%)
WLB Total	**4046**	**1489**	**36.8%**	

Table 7.6: Total Count of Completed Schemes for 'Residential Conversion' by Existing Unit Type (figures for proportion of dwelling stock taken from GLA 2017 SHLAA Table 11.1)

	Total Net Gain through 'Conversion' Schemes	Net Gain through Conversion Schemes - Existing Flat or Apartment	Proportion of Schemes Affecting Existing Flat or Apartment
LB Barnet	1229	291	23.7%
LB Brent	358	-2	-0.6%
LB Ealing	1126	216	19.2%
LB Harrow	803	163	20.3%
LB Hillingdon	192	27	14.1%
LB Hounslow	157	31	19.7%
WLB Total	**4739**	**1082**	**22.8%**

Table 7.7: Total Net Gain of Completed Schemes for 'Residential Conversion' by Existing Unit Type

7.35 Schemes where the existing unit type is recorded as a 'Flat, Apartment or Maisonette' are associated with a substantial proportion of scheme-level 'conversion' activity. This is most pronounced as a proportion of recorded schemes. Across West London around 37% of recorded 'conversion' schemes involve flatted property. There is variation between constituent boroughs. Generally, those closer to Inner London, with a higher existing proportion of flats and greater concentrations of 'urban' character show a higher proportion of schemes affecting flatted property. Lower proportions are recorded in boroughs towards the edge of the capital. Whilst LB Hounslow is somewhat contrary to this trend (c.40% of relevant schemes affecting flatted property) this needs to be viewed in the context of lower overall totals for 'conversion' schemes.

7.36 The fundamental concern arising from this finding is that the role of flatted property in the sample of 'conversion' schemes exacerbates the departure between modelled estimates of capacity for development on small sites and actual trends in delivery. The 'modelled' capacity indicated by the GLA SHLAA 2017 excludes flats yet the delivery analysis demonstrates these are also a significant source of conversions. This highlights that the step-change required in terms of the number of non-flatted properties brought forward is in-fact greater than simply treating the 'conversion' type as a total measure of activity.

7.37 The actual characteristics of development affecting existing flatted properties through conversion is better indicated by the table setting out the resulting net residential gain. This indicator highlights alternative sources of pressure on dwelling stock i.e. **de-conversion alongside opportunities for the sub-division of existing flatted property**. The sum total of 'conversion' activity affecting existing flatted property results in a small net gain in units in all constituent boroughs except LB Brent. Comparing this with the 'count' of total schemes it is nonetheless the case that the characteristics of development limit the growth in dwelling stock achieved. There is generally a net conversion factor of less than +0.5 units (after allowing for the existing property) when the existing units affected by proposals comprise flats.

7.38 It is likely to be the case that the findings represent a composite total, whereby the opportunities for sub-division in certain cases are also offset by examples of 'de-conversion' reducing the total number of units in certain schemes. This indicates a range of different pressures and demands for the use of housing stock. This forms part of the wider potential impacts of draft Policy H2 in terms of whether its measures to promote a step-change in the net gain of development on 'small sites' take sufficient account of wider trends in how the conversion of dwellings meets housing needs[3]. At least parts of the delivery trend (e.g. de-conversions) indicate pressures in

[3] The constituent authorities consider that past trends in sub-division of flats might be an over-estimate (i.e. don't add them all back in) because these trends change over time and specifically the need to comply with space standards and

housing need (i.e. for family-sized accommodation) contrary to the 'modelled' forecast of future supply that places a significant emphasis on the conversion of flats to houses. There is likely to be a need for constituent boroughs to indicate this specifically through local evidence of housing needs.

7.39 Further work would be required to interrogate the specific reasons why LB Brent observes a net loss in housing stock as a result of proposals seeking to convert existing flatted development. This indicates specific pressure for de-conversion. The sample contains examples of larger blocks being comprehensively altered to provide a reduced number of dwellings. However, it is also possible that more detailed analysis would indicate geographic concentrations of proposals to re-use stock as single family dwellinghouses. This may correlate more closely with socio-economic and demographic indicators and the need for family-sized units in the area. Some of the constituent boroughs indicated to us at the Workshop session that this had been an outcome of development they had observed more generally as part of demand for larger family-sized accommodation. It may also be the case that these trends are observed on 'Large Sites'. This could include de-conversion of multiple properties in a larger mansion block. It could also include revisions to proposals before they are implemented i.e. to reduce the number of units originally proposed.

7.40 As indicated above, one clear finding from reviewing the descriptions of development for individual schemes is that the 'conversion' typology is often enabled by the provision of extensions to existing property. Although the LBs of Brent and Hillingdon deliver different volumes of this development type as a proportion of activity in the sample period, both demonstrate that this is a feature affecting around 50% of the net gain delivered, as shown in Table 7.8.

Schemes Completed and Classified as 'Conversion' **Sum of Net Residential Gain**	**LB Brent**	**LB Hillingdon**
Incorporating Additional Development Through Extensions	292	110
No Additional Development Through Extensions Identified	341	112

Table 7.8: Sum of Net Residential Gain for 'Conversion' Development Typologies Dependent on the Provision of Additional Development Through Extensions to Property

7.41 Further categories also sought to establish whether replacement or provision of outbuildings was also a characteristic of conversion schemes. This proportion was

ignore examples without planning control (e.g. Certificate of Lawful Development) might restrict the total number of schemes achievable in the future).

less significant and may reflect that a proportion of conversion activity may occur on smaller plots or existing flatted property. However, this was a feature of around 5% of completed development in LB Brent and 16% in LB Hillingdon. The difference may relate to the existing character of residential areas and features of larger premises towards the edge of the capital.

Detailed Characteristics for 'Change of Use' Schemes

7.42 We have taken account of the proposed approach to draft Policy H2 and the in-principle disapplication of the *presumption in favour of small housing developments* for the Change of Use development type. This is a diverse category where the degree of potential sub-classification of applications is most extensive, but the value may be limited where the expected relationship with future policy is more limited. However, we have demonstrated the importance of these elements as a proportion of overall past trends and also highlighted that in some cases schemes involving Change of Use may include unit-level data treated under other development types for the purpose of the GLA 2017 SHLAA.

7.43 Reliable data on the proportion of schemes achieved under rights for Permitted Development is already contained in the LDD through monitoring of 'application type'. We have referred to this in terms of the relationship with other characteristics of development and separate this component of the sample from further analysis. However, detailed commentary is considered to add limited value to development outcomes due to the exclusion of these types of application from draft Policy H2.

7.44 Our framework for sub-classifying applications reveals a number of characteristics that appear most closely related to a larger proportion of development opportunities and outcomes. Some weight can be placed on the nature of a proportion of schemes that look to retain mixed-uses identified in the development proposal. From the perspective of a single site there is also a relatively strong representation of 'multiple scheme' addresses attracting numerous records for application activity. Whilst helpful, these do not necessarily add significant further value to other indicators for the development process that we have assessed elsewhere.

7.45 In terms of key findings, we have focused on establishing the proportion of applications and potential net gain that does or does not suggest development involve ***part new-build infill within plot or demolition and replacement of existing structures***.

7.46 This sub-category is relatively broad in nature and may also encompass upward extension of existing buildings (given that the GLA 2017 SHLAA would also treat this as 'new build' development). The purpose of this is to highlight schemes that could to some degree be regarded as ***vacant or under-utilised brownfield sites*** **under Part D(1) of draft Policy H2**.

7.47 We regard this element of Part D to policy H2 most open to interpretation. Although applications proposing Change of Use are subsequently specific as being excluded from Part D the characteristics of comparable schemes coming forward might in practice mean they are recorded against this 'development type' as part of planning monitoring. The characteristics of these examples is such that they may (but not always) be regarded as 'hybrid' schemes in terms of other 'unit-level' development types recorded. However, for the reasons outlined this is not always a reliable indicator.

7.48 There may be a need for subsequent guidance or revision to monitoring practices to record where schemes are or are not approved in accordance with draft Policy H2. Until such time as the proposed policy approach comes into effect, however, this acts as a potential area of conflict between how development should be classified.

7.49 Table 7.9 uses two sample boroughs to indicate the proportion of net residential gain 'submitted', 'stared' or 'completed' for 'Change of Use' schemes based on the presence of potential associated infill or redevelopment elements. This analysis excludes Change of Use through Permitted Development.

7.50 For LB Brent more than half of 'Change of Use' activity (57%) appears to involve partial redevelopment or extension. This affects proposed schemes of all scales although includes a significant contribution of 'small sites' proposing more than 25 units. The proportion of schemes in LB Hillingdon remains significant (37%).

7.51 The nature of schemes that may be classified in this way is highly varied, but we have identified examples such as the following:

- Change of Use and partial redevelopment of Public Houses;
- Partial Change of Use and part-redevelopment of low-density community facilities;
- Change of Use and upward extension or redevelopment car parking facilities at existing office or light industrial premises
- Re-use of upper floors of buildings not currently recorded as lawful residential uses with associated extension or remodelling (potentially incorporating ground floor uses and external additions).

LB Brent **Sum of Potential Net Gain 'Submitted', 'Started' or 'Completed' – by proposed units** **'Change of Use' Classification**	**0-10 Units**	**11-25 Units**	**More than 25 Units**	**TOTAL**
Development does not involve part new-build infill within plot or demolition and replacement of existing structures	285	53	-2	**336**
Development involves part new-build infill within plot or demolition and replacement of existing structures	223	100	117	**440**
LB Hillingdon **Sum of Potential Net Gain 'Submitted', 'Started' or 'Completed' – by proposed units** **'Change of Use' Classification**	**0-10 Units**	**11-25 Units**	**More than 25 Units**	**TOTAL**
Development does not involve part new-build infill within plot or demolition and replacement of existing structures	182	7	160	**349**
Development involves part new-build infill within plot or demolition and replacement of existing structures	106	25	72	**203**

Table 7.9 Sum of Potential Net Residential Gain for 'Change of Use' 'Started', 'Submitted' or 'Completed' by Number of Units Proposed and Whether Partial Redevelopment is Proposed. 'Change of Use' records exclude schemes under Permitted Development Rights

7.52 These types of opportunity are typical of those that might represent 'urban capacity' on under-utilised sites. However, a greater degree of care is needed to interpret and declare whether they accord with the proposed measures of draft Policy H2. For example, as a result of proposed Minor Modifications to the draft London Plan it has been specified that the *presumption in favour of small housing developments* should not apply to redevelopment of Public Houses.

7.53 This may suggest that proposed measures of development control could actually seek to reduce levels of 'small site' activity below those observed in past trends. The disconnect between evidence and policy is emphasised where other policies in the

draft London Plan (such as HC6 – Supporting the Night-Time Economy) support different outcomes. In these instances draft Policy H2 cannot be read in isolation and does not seem like it will be effective in boosting delivery.

7.54 Effectively, this section helps to confirm that over-and-above the fundamental soundness concerns with the 'modelled' elements of the small sites target through a 'forecast' approach greater care is also needed before concluding that the 'remaining windfall' elements of the target will continue to consistently become available. Greater restrictions on the scale and type of proposals may be a direct impact of the specific safeguards draft Policy H2 seeks to impose on certain examples.

Identifying Schemes Generating a Net Loss of Dwellings or Indicating Different Forms of Residential Use

7.55 One further benefit of the sub-classification of application activity is that it enables records within the sample series that result in a net loss of dwellings to be more easily identified and the reasons recognised. In-principle, data entry criteria within the LDD mean that results can be filtered by those only constituting a net loss. However, when reporting is undertaken on other elements (e.g. 'development type' or 'permission type') the output will be a cumulative net position of schemes separately generating gains and losses.

7.56 The GLA 2017 SHLAA confuses this aspect of delivery and the development process to some extent. As part of the Part A: Critique we have confirmed that, when calculating specific inputs such as gross growth factors and conversion factors, schemes resulting in a net loss of dwellings are ignored. However, where overall trends in activity are presented, schemes leading to a net loss in dwelling do not appear to be excluded. This means they are reflected to some degree in the overall picture of 8-year trends and will have some impact on the components of the 'small sites' target retaining a traditional *windfall*-based approach. Key issues therefore relate to the 'modelled' component.

7.57 The GLA 2017 SHLAA does not confirm whether the impact of the 1% 'yield growth rate' of existing stock coming forward for development has taken account of schemes leading to a loss of dwellings. As a measure of capacity to which growth factors are applied it is unlikely to reflect that, for some existing stock, delivery outcomes and the development process need to allow for a net loss of accommodation.

7.58 The actual net impact on overall housing stock may be less straightforward to quantify as a result of these specific schemes. In terms of illustrating the effect on measures of capacity for dwelling stock where 'small site' activity occurs the actual count of application records may be more helpful. Table 7.10 illustrates key findings and summarises key records within the sample:

Sample Boroughs **Classification of Scheme Records Indicating Loss of Dwellings or Change In Use of Residential Accommodation** **Count of Application References**	**LB Brent**	**LB Ealing**	**LB H&F**	**LB Hounslow**
'De-Conversion'	243	130	127	40
Change of Use – Loss of Existing Residential Uses	31	65	20	18
Conversion Affecting Provision of HMOs, Multi-Occupancy, Bedsits or Non Self-Contained Accommodation	30	19	9	10
Count of Total Application Records Under 0.25ha	2067	3238	2446	1231

Table 7.10: Count of Application Records Where Sub-Classification Applies to Schemes Generating a Net Loss of Residential Dwellings

7.59 There is a relatively wide variation in results likely to represent different issues within areas and illustrating different trends and pressures on the use of housing stock. In LB Brent around 15% of applications fall under the categories identified and the figure is round 7% in LB Ealing. Correlations may reflect issues identified in the Critique including overcrowding and multi-generational households.

7.60 Analysis categories have been identified to generate the following specific development types:

- Change of Use from Existing Self-Contained Residential Dwellings
- De-Conversion of Existing Residential Property

7.61 Both categories are relatively straightforward to classify. De-conversion is typically clearly indicated by a 'Conversion' development type recorded in the LDD. Records that identify more than one existing property and a development outcome that results in a net loss (i.e. two flats to one) logically represents a consolidation of residential floorspace and may reflect demand for larger properties or single-family accommodation.

7.62 The 'Change of Use' development type can also be selected for records that include existing residential properties. Judgement is necessary in terms of whether these are in-fact 'hybrid' records. However, where the principal proposed future land use is non-residential in nature it is correct to record the change as leading to a loss of self-contained accommodation. Examples can be diverse and might include factors such as loss of flats above expanded surgeries or commercial premises; loss of staff accommodation; or use of buildings for education or religion. Most commonly, where Use Class and accommodation characteristics are both recorded correctly, this classification would also apply to an existing residential dwelling moving into use as a *Sui Generis* House in Multiple Occupation (HMOs).

7.63 There are limited other instances in which these trends and outcomes can occur, but the overall position may not result in a net loss of dwelling stock. For example, a 'hybrid' scheme for Change of Use to residential development may also involve the de-conversion of existing residential units in the premises to create larger flats with improved amenity and floorspace characteristics. The overall scheme may incorporate additional units equating to a net gain, but the reasons specific development characteristics have been achieved may be similar.

7.64 It is the issue of non-self-contained accommodation (including HMOs) that makes quantifying the actual net change more challenging. In our experience of analysing data this can also affect the 'Conversion' development type. There are, for example, some individual issues with data entry that may reflect confusion between inputs for bedrooms in HMOs compared with self-contained bedsits. This can have a fairly significant impact on the net change recorded. Many application records also exist for conversion from C3 dwellinghouses to Homes in Multiple Occupation for up to six persons (C4 Use Class). This should reflect a zero-net change in unit numbers but indicates a different pressure on use of housing stock. Finally, 'conversion' schemes may also pick up trends such as the use of outbuildings or property extensions as a 'Granny Annexe'. Our solution has been to count records for 'Conversion' schemes where evidence indicates potential impacts on the level of HMOs, non-self-contained, bedsits or other multi-occupancy facilities.

7.65 Two other points should be noted:

- The findings above rely on planning application records and development monitoring. The incidence of multi-person households and HMOs is highly likely to be higher than the levels captured by planning data; and
- The 'De-conversion' and 'Change of Existing Residential Use' classifications are broad in terms of characteristics captured. The impact on existing stock may only affect smaller properties but can also include a loss of HMOs or other multi-person accommodation.

7.66 No specific recognition of this pressure on the use of units on 'small sites' appears to be acknowledged in the GLA 2017 SHLAA. It is our opinion that some allowance for these elements should be provided for as part of a wider understanding of how housing needs are met. This can only practically indicate downward pressure on capacity measured by the 'modelled' approach and 1% yield growth rate.

Findings Against Spatial Criteria of Draft Policy H2

7.67 An overall understanding of how the delivery of development relates to proposals according with the spatial indicators of draft Policy H2 is also important. However, building on the position of the Critique and soundness concerns with the overall approach, we do not consider that excessive weight should be placed on highly location-specific findings. Where the overall picture suggests that indicators adopted by the GLA SHLAA 2017 (i.e. 800m buffers) are fundamentally inaccurate and not representative of trends, highlighting local examples or exceptions will be of less benefit. This is also the case where highly localised positions would detract from strategic planning impacts such as meeting housing needs and the need for a plan-wide approach to identifying additional sites or supply.

7.68 To provide the closest form of comparison it is possible to directly measure existing records of net completions compared with the inputs used to inform 'small site' modelling assumptions. Essentially, this looks to establish the ratio of net dwellings completed on relevant 'New Build' and 'Conversion' schemes compared to the 'adjusted' dwelling stock used to inform the 1% 'yield growth rate' assumption in the GLA 2017 SHLAA. Annex F sets out these findings based on all activity recorded within 800m of Station or Town Centre buffers. The findings are summarised in Table 7.11 below.

		Net Completions per annum (FY2008 to FY2015) Within 800m of Town Centres or Stations As A Proportion of GLA 2017 SHLAA 'Small Sites' Model 'Adjusted Dwellings' Total	
	SHLAA 'Small Sites' Model 'Adjusted Dwellings' Total	**'New Build' and 'Conversion' Schemes Proposing 1-10 Units**	**'New Build' and 'Conversion' Schemes Proposing 1-25 Units**
LB Barnet	57,716	0.30%	0.36%
LB Brent	47,057	0.15%	0.26%
LB Ealing	54,056	0.25%	0.32%
LB Harrow	43,223	0.18%	0.25%
LB Hillingdon	35,911	0.14%	0.21%
LB Hounslow	33,850	0.17%	0.24%

Table 7.11: Comparison of Average Net Housing Completions on Relevant 'New Build' and 'Conversion' Development Types as a Proportion of GLA 'Small Sites' Yield Growth Rate Assumption (1% per annum)

7.69 The analysis reports the actual net completions rather than the existing number of residential properties affected by proposals. Accounting for 'gross growth rates' and 'gross conversion factors' (see Paragraph 6.26 of the GLA 2017 SHLAA), plus those 'new build' schemes not within existing residential sites, the actual number of affected properties is likely to be significantly lower than the completions total. 'Net completions' are also considered to provide a more realistic picture in terms of actual patterns of delivery. There will be certain addresses and sites within the reported sample where development has taken place but the resulting outcome has been a net loss or zero net change in dwellings, contrary to the yield growth rate anticipated by the GLA 2017 SHLAA.

7.70 Net completions compared with dwelling stock on this basis capture a more diverse pattern of supply than the GLA 2017 SHLAA 'small site' modelling assumptions. For Inner London, one reason the percentage as a proportion of existing stock may be greater is the increased percentage of flatted stock. Equally, however, Inner London has historically demonstrated stronger trends in 'New Build' infill development and subdivision of flats might exist alongside conversion of houses. Evidence from past trends demonstrates the importance of diverse opportunities on small sites. Interestingly, our own sample suggests that the rate of intensification on the measure used is greater in LB Ealing, Brent and Barnet, which for Outer West London boroughs sit closer to neighbouring Inner London boroughs.

7.71 Nevertheless, the findings further illustrate that development with the characteristics of small 'new build' and 'conversion' typologies currently makes a limited contribution to total output. Activity as a proportion of existing dwelling stock is markedly below 1% in all constituent boroughs. Whilst trends are generally consistent over time the proportion has potentially reduced marginally in recent years.

7.72 Annex F also sets out the same results based on activity measured in the 800m buffer of individual Town Centres contributing to the 'small sites' model in each constituent borough. Following findings of the Critique it should be noted that in some cases Town Centres themselves will not be located in the relevant borough and the 'adjusted dwelling stock' used in modelling assumptions may be more limited. There is a greater fluctuation in results by Town Centre, with an overall trend that net completions as a proportion of existing stock may be slightly greater than when the position with combined 800m Station and Town Centre buffers is used. If all existing stations used in the 'small site' modelling assumptions were also compared separately many of those station buffer unrelated Town Centre locations would be expected to provide an even weaker guide to activity.

7.73 It is still the case for individual Town Centres, however, that rarely (if ever) is a 1% threshold exceeded. For some Town Centres with a large existing dwelling stock contributing to the 'modelled' element of capacity development trends in small 'new build' and 'conversion' schemes have been nominal.

7.74 A closer understanding of these relationships should otherwise form a priority for future work in policy-making. At present it appears past trends and the current supply pipeline will not achieve the targets in draft Policy H2. Furthermore, wider policy impacts of the policy have not been assessed in terms of the effectiveness of proposed measures to manage supply either in terms on demonstrating estimates are reliable or wider impacts have been acknowledged.

8. The Partial Pipeline

This Chapter highlights the importance of taking a more recent view regarding an up-to-date snapshot of current outstanding opportunities to deliver development on 'small sites'. This is measured in terms of relevant schemes that are currently either under construction ('started') or where development has not started ('submitted'). The findings provide the most immediate measure of whether the proposed targets for 'small sites' are likely to provide a reliable and achievable estimate of delivery from 2019 given that much of the potential activity in the initial years will already be identified by the planning system. The current position of the pipeline may also demonstrate the closest relationship with existing trends and demonstrate whether recent impacts, such as local planning policies, development standards and viability, have impacted on the opportunities put forward.

Criteria for Identifying the Pipeline

8.1 Having identified the importance of recent trends in approvals by development type and scale it is helpful to specifically address the effect of this on the current 'partial pipeline' of committed supply on small sites. Annex G sets out the full range of schemes approved between FYs 2013 and 2017. This further breaks down the range of schemes identified by development type and scale (in terms of the number of units proposed). By extension it is possible to highlight those examples that – by virtue of these criteria – do not accord with the presumption in favour of small housing developments.

8.2 The reasons for selecting the most recent five-year period is to try and capture the characteristics of the most recently approved developments on small sites where supply has not yet been completed. This looks to provide an accurate snapshot of the general recent upturn in approvals on 'small sites' and to understand the key trends in delivery that may contribute to the proposed targets at Table 4.2 of the draft London Plan. Excluding historic records (pre-2013) that still show outstanding consent looks to avoid potential anomalies such as schemes lawfully implemented but with no immediate prospect of completion.

The Importance of Schemes Proposing 25+ Units

8.3 Table 8.1 summarises the position for each constituent borough in terms of the proportion of the 'partial pipeline' on sites proposing more than 25 units. For the avoidance of doubt, this analysis continues to focus only on 'small sites' below 0.25ha. Currently, this includes a high proportion of schemes for Change of Use. This serves the purpose of highlighting the relatively weak relationship between the characteristics of committed development on small sites and the outcomes envisaged by draft Policy H2. This outcome is not surprising given the wider overall trends in activity over recent years, specifically reflecting support through increased Permitted Development Rights. However, this indicates that around 40% of committed supply does not comprise a ***small housing development*** under the terms of draft Policy H2.

	Change of Use **Pipeline of Schemes Proposing 25+ Units**	New Build **Pipeline of Schemes Proposing 25+ Units**	**FY 2013-2017 Pipeline - Total Potential Gain**	**25+ Units as Proportion of Total Pipeline**
LB Barnet	544	582	3276	34.4%
LB Brent	947	554	2566	58.5%
LB Ealing	146	189	2084	16.1%
LB Harrow	443	197	1268	50.5%
LB Hillingdon	382	221	1422	42.4%
LB Hounslow	373	159	1414	37.6%
WLB Total Position	**2987**	**2069**	**13073**	**38.7%**

Table 8.1: Sum of Potential Net Gain on Schemes Identified in the Partial Pipeline by 'New Build' and 'Change of Use' records Proposing over 25-units and on sites below 0.25ha in size

Schemes Proposing 11 to 25 Units

8.4 Another element identified within the analysis of the 'partial pipeline' is the very limited representation of schemes proposing between 11 and 25 units. This is an issue identified by the Part A Critique and further reiterated in Section 10 below summarising the outcomes of Stakeholder Engagement. The very low representation of these schemes is generally consistent across all constituent boroughs and indicates that the factors affecting development are likely to have a relatively equal impact across West London (and most likely impacting on a pan-London basis). Issues are likely to principally relate to the requirement to contribute towards planning obligations providing affordable housing for proposals above a threshold of 10-units. However, the range of constraints to delivering schemes proposing more than ten units may be more extensive, relating to factors such as site availability and cost (and associated viability implications relative to the scale of development). Other development standards and policy requirements may also disproportionately impact on this intermediate scale of development.

8.5 The characteristics of 'new build' schemes proposing more than ten units are not part of the 'modelled' elements of forecast capacity for development on 'small sites'. Future trends in the delivery of such schemes will therefore be informed by recent activity based on past trends. However, the proposed operation of draft Policy H2 and the *presumption in favour of small housing developments* would anticipate that the step-change in activity should be supported on schemes within this range.

8.6 Evidence from the 'partial pipeline' does not support the conclusion that the policy itself contains sufficient mechanisms to secure these outcomes. Evidence from Annex F (dealing with 8-year completions trends in the 'modelled' elements and also schemes proposing up to 25 units) indicates that the 11 to 25-unit category has generally sustained fairly muted levels of output. This may reflect different constraints and impacts on development over the 8-year period (e.g. the wider recession in earlier years and impact of planning obligations more recently). However, it is potentially the case that these constraints have increased more recently, further limiting actual delivery from this category of sites. This view is generally further supported by comparing the current 'partial pipeline' for 'New Build' schemes of this scale against the evidence of past trends. This should also take account that not all schemes in the 'partial pipeline' will necessarily be delivered and may come forward over a number of years.

8.7 It is also the case, as can be observed in the full data of Annex G, that other development types within the 11-25 proposed unit category are less well represented than proportionally larger and smaller schemes.

	'New Build' Schemes 11-25 Units Completed FY 2008-2011 800m Station or Town Centre	'New Build' Schemes 11-25 Units Completed FY 2012-2015 800m Station or Town Centre	FY 2013-2017 Pipeline – 11-25 Units within 800m Station or Town Centre	'New Build' Schemes 11-25 Units % of Total 'Partial Pipeline' 2013-2017
LB Barnet	165	92	191	5.8%
LB Brent	191	201	79	3.1%
LB Ealing	194	89	103	4.9%
LB Harrow	143	84	37	2.9%
LB Hillingdon	124	64	21	1.5%
LB Hounslow	86	107	34	2.4%
WLB Total Position	**903**	**637**	**465**	**3.4%**

Table 8.2: Sum of Net Potential Gain of 'New Build' Schemes in the Partial Pipeline Proposing 11-25 Units as a Proportion of Total Pipeline and Compared with Delivery of Similar Schemes FY2008 to FY2015

8.8 There are a number of potential implications of this current position. One concern of the constituent boroughs is that part of the capacity measured to provide for 'modelled' elements of 'New Build' development (proposing 1 to 10 units) risks being 'double-counted' with the prospect for activity forming part of assumptions for past trends. At present the potential impact of double-counting is likely to be reduced because of the lack of perceived opportunities for schemes proposing 11 to 25 units. There appears to be a greater likelihood of applications for fewer dwellings (that would also be below thresholds for affordable housing) and that would be consistent with the 'modelled' element for small sites.

8.9 The absence of 'double counting' does not, however, indicate any reduction in the potential wider impacts of the approach. In-fact, this suggests that a greater proportion of schemes already avoid significant financial contributions towards infrastructure and affordable housing. The boroughs are concerned that this impact will be magnified by the scale and type of change in the pattern of supply draft Policy H2 requires.

The Partial Pipeline and Previously Unimplemented Consent

8.10 Another important finding from analysis of the 'partial pipeline' is the ability to establish whether the potential delivery of further development on approved 'small site' schemes represents the first instance of application activity on a given site. This is significant again having regard to the difference between the GLA 2017 SHLAA's role as a measure of *capacity* for development on 'small sites' and a full assessment of the characteristics of development on small sites.

8.11 Where it can be demonstrated that the partial pipeline in-fact comprises repeat activity on a smaller range of sites it can reasonably be queried whether the approach in draft Policy H2, based on evidence providing a measure of capacity only, is likely to provide a reliable estimate of future supply. The fact that not all applications relate to proposals on land put forward for the first time suggests the range of candidate sites comprising opportunities for development is more limited than suggested by a simple measure of capacity, even if past trends in overall development are taken into account. This is notwithstanding the other factors likely to determine whether delivery actually occurs on consented schemes, many of which may explain the reasons for multiple proposals being put forwards.

8.12 Our analysis of information on delivery substantiates this concern consistently across all constituent boroughs, as summarised by Table 8.3 overleaf. Full information, drawing on the dataset for the 'partial pipeline', is contained in Annex G.

	Sum of Net Potential Gain Schemes with status of 'Started' or 'Submitted' Single Application Reference on Unique Address	Sum of Net Potential Gain Schemes with status of 'Started' or 'Submitted' Multiple Application References on Unique Address	FY 2013-2017 Pipeline - Total Potential Gain	Potential Net Gain from Schemes with Multiple Application References on Unique Address As % of Total Potential Gain
LB Barnet	2446	830	3276	25.3%
LB Brent	1250	1316	2566	51.3%
LB Ealing	1494	590	2084	28.3%
LB Harrow	777	491	1268	38.7%
LB Hillingdon	1148	274	1422	19.3%
LB Hounslow	891	523	1414	37.0%
WLB Total Position	**8006**	**4024**	**12030**	**33.3%**

Table 8.3: Sum of Net Potential Gain of Net Potential Gain in the Partial Pipeline and the Proportion of Qualifying Records on Unique Addresses with Evidence of Multiple Approved Schemes

8.13 All constituent boroughs indicate **at least 20% of future potential net residential gain at 'scheme level' would comprise further activity on sites where other application references can be assigned**. The average position across West London is that this equates to around 33% of supply in the 'partial' pipeline. The recent trends in application activity therefore conflict with the 'capacity-led' assumptions for the evidence informing the proposed targets for development on 'small sites' to a significant degree. Based on the information summarised above in terms of the pattern of supply consistently expected to be put forward for development it would be expected that a significant proportion of delivery will not represent the first instance potential schemes have been identified.

9. ‘Small Site’ Trends in Context

The purpose of this chapter is to compare findings with trends is delivery on small sites with other elements of supply and to re-introduce existing elements of the London-wide focus to support increased development on small sites. This provides a basis to demonstrate that our findings on delivery reflect a wider body of views on the challenges for development on ‘small sites’ and to contextualise these within the overall drive to meet housing needs. The chapter confirms that in many respects a focus on ‘small sites’ should be differentiated from factors affecting large sites and their current contribution towards meeting needs. It also recognises that, as part of the draft Policy H2 proposals, the relationship between different types of supply could interact in future. This may affect the consideration of alternatives and may provide further justification for why the proposed approach in the London Plan will not indicate a reliable estimate of future supply.

Comparison with Large Sites

9.1 The use of ‘scheme-level’ data within our sample means that annual comparison with delivery trends on ‘Large Sites’ over 0.25ha is not straightforward. This is because our results will not reflect that development on larger schemes is likely to occur over a number of years. However, analysis is possible to confirm broad patterns in terms of the relationship with relevant Station and Town Centre boundaries and the proportion of applications listed with a recorded status as ‘Lapsed’ or ‘Superseded’.

9.2 It could reasonably be expected that these findings may confirm the recent focus on plan-making and outcomes in terms of identifying further ‘Large Sites’ for potential (or confirmed) allocation and development. The Part A Critique discusses the background to housing supply benchmarks in West London as part of previous iterations of the London Plan to demonstrate the increased role for major development and regeneration. One potential observation is therefore that the current ‘pipeline’ of large sites may appear materially larger than past trends in completion from these sources.

9.3 Large sites within the sample are a diverse category, comprising all entries over 0.25ha. It is also the case that in some instances one larger allocation might be sub-divided across several schemes. This means that when comparing an overall sample of scheme-level records the characteristics of major development may be reflected in more than one way by the source data. Some records will deliver numbers of proposed units or cover site areas not materially different to some types of ‘small site’ whereas other schemes for several hundred dwellings may be covered by a single LDD entry.

9.4 It is possible to use a number of sample boroughs to indicate broad findings on large sites. We have focused on LB Ealing and LB Harrow. The results in terms of a 'count' of schemes by development type on 'Large Sites' are shown on Tables 9.1 and 9.2 indicating the potential net gain from within this subset.

	Development Type	Complete	Lapsed	Started	Submitted	Superseded
LB Ealing	*Change of use*	8		1	4	2
	Conversion	1				
	Extension			1		
	New Build	56	7	25	28	10
LB Harrow	*Change of use*	4	2	1	1	3
	Conversion		1	2		1
	Extension		2			
	New Build	46	8	17	9	12

Table 9.1: Count of Scheme Level Records for Large Sites by 'Development Type' (All Approvals FY2004-FY2017)

	Development Type	Complete	Lapsed	Started	Submitted	Superseded
LB Ealing	*Change of use*	872		263	699	34
	Conversion	18				
	Extension			71		
	New Build	4117	122	6676	7570	1035
LB Harrow	*Change of use*	315	55	215	54	371
	Conversion		3	36		3
	Extension		70			
	New Build	2926	947	1995	2443	1609

Table 9.2: Sum of Potential Net Residential Gain for Large Sites by 'Development Type' and Application Status (All Approvals FY2004-FY2017)

9.5 It is evident that the 'new build' development type dominates the pattern of activity on large sites in the two sample boroughs. This is true in terms of both the count of recorded schemes and especially the potential net gain associated with this pattern of development. The sample of 'Large Sites' providing 'extension' or 'conversion' to existing premises is unlikely to be representative of overall activity given the limited number of records. The strength of the pipeline of 'New Build' large sites is evident in both LB Ealing and LB Harrow. In both boroughs the combined records of 'submitted' and 'started' schemes materially exceed existing evidence of large, completed, 'new build' schemes in the sample period FY2004 to FY2017.

9.6 Table 9.3 below provides a comparison in terms of timescales for development (where complete) and the proportion of applications of a given 'development type' recorded as Lapsed or Superseded based on the equivalent position on 'small sites'.

	Development Type	**Large Sites**		**Small Sites**	
		% Lapsed or Superseded	Average Time to Completion (months)	% Lapsed or Superseded	Average Time to Completion
LB Ealing	*Change of use*	13.3%	37	17.5%	16
	Conversion	0.0%	66	12.1%	14
	Extension	0.0%		16.7%	22
	New Build	13.5%	30	25.7%	26
LB Harrow	*Change of use*	45.5%	30	20.6%	16
	Conversion	50.0%		18.2%	14
	Extension	100.0%		25.8%	24
	New Build	21.7%	36	31.2%	27

Table 9.3 Comparison of Characteristics on Large Sites by Development Type, Average Completion Period and Proportion of Schemes 'Lapsed' or 'Superseded'

9.7 In terms of comparing timescales for completion we have measured each scheme individually (i.e. based on the approval and completion date of the relevant consent). This will not necessarily reflect where the overall development is delivered over several phases. However, unlike activity on 'small sites', the greater number of units typically being provided, and larger land area, means individual records may have more discrete characteristics. Whereas a 'small site' with multiple records may be dependent on the sequential delivery of different development types (i.e. Change of Use followed by extensions), on larger sites each scheme may relate to different parts of the wider land area.

9.8 Despite the substantially greater scale of development on 'large sites' it appears that average timescales for completion are not substantially greater than on small sites for the 'new build' development type. Another key finding in terms of the development process is that a lower proportion of 'New Build' schemes appear as 'Lapsed' or 'Superseded' within the sample series on 'Large Sites' compared to 'Small Sites'. This is true for both the proportion of applications and the proportion of actual net supply recorded as unimplemented. Schemes for 'Change of Use' on Large Sites appear slightly more volatile in terms on implementation rates and have longer timescales for development than examples on 'small sites', although the sample being compared is admittedly small.

Comparing Findings Against Initiatives to Promote Development on 'Small Sites'

The Small Sites and Small Builders Programme

9.9 Our findings on delivery reflect that the 'New Build' category of activity on 'small sites' is challenging in many parts of Outer London. Whilst trends have been relatively consistent the extent of such opportunities has been generally more limited than peak levels of activity observed in Inner London, at least prior to the recession.

9.10 The challenges for this pattern of development may include the availability of sites, development viability and existing land use constraints (e.g. Green Belt or Open Space designation) that draft Policy H2 would not in principle seek to overcome.

9.11 The GLA's awareness of the factors affecting development on small sites has evolved over recent years. A number of initiatives looking to support delivery have been announced and implemented. These are multi-faceted in nature and provide inputs that would assist the development process and seek to direct specific patterns and outcomes in terms of delivery where suitable opportunities are identified. A review of these measures provides a different means of assessing how factors affecting development can be tackled and the potential nature and scale of sites that might be provided as a result.

9.12 The 'Small Sites and Small Builders' Programme is an initiative supported and implemented by the GLA that has been partly supported by receipt of Government Growth Deal Funding. The evidence base for the programme is more long-standing and in-part represents a response to issues identified in the Part A Critique as well as significant efforts to map public sector landholdings. Around ten specific land assets within the ownership of Transport for London have formed the basis of a 'pilot' programme to enable land promotion and disposal to interested parties.

9.13 Publicity surrounding the programme is of interest and development stakeholder engagement has been sought to understand the nature of parties interested in the opportunities made available through the pilot (as well as where there may be a wider interest in development on 'small sites'). The pilot complements and draws attention to a wider range of resources (principally aimed at public landowners) to enable them to assess and facilitate beneficial disposal of sites for development. At the same time, the resources available to small builders themselves seek to direct stakeholders towards access to finance, details of public sector landholdings and advice on different tenures and development models (e.g. self-build and community housing).

9.14 The 'Small Sites and Small Builders' Programme has also helped to establish the ways that support might be expended to make the land disposal and development process more effective and capitalise on evidence indicating suitable opportunities. Longer term objectives identified as part of the announcement of the programme anticipate broader mechanisms to bring sites forward, including:

- use of standardised legal documentation;
- sustaining a GLA 'Marketing Portal'; and
- funding to public sector landowners for site identification, due diligence and unblocking unviable sites

9.15 These are all characteristics of the development process where our findings indicate that support would be beneficial. One recently launched means of support to deliver on opportunities more widely comprises the 'London Development Panel 2' (from August 2018). An original panel, pre-dating some of the more recent focus on 'small sites', expired in 2017. This identifies a framework of 29 providers selected for their ability to support residential-led development and the Mayors' objectives. Selecting providers from the panel can deliver cost savings through the development process as part of 'mini-competitive' tender procedures where a public body is looking to be a partner as part of the development itself or can identify the most effective basis for site disposal.

9.16 The arrangements supported through the Development Panel are free to use in terms of access to potential benefits, though may not differ greatly from partnerships individual boroughs seek to establish as part of specific development aspirations (e.g. disposal of garage sites or site-specific regeneration initiatives).

Relationship with Alternatives and the Achievability of 'Small Sites' Targets

9.17 In October 2018 the GLA announced a £10million Homebuilding Capacity Fund to increase housing delivery. Priority two of the fund, as stated in the Homebuilding Capacity Fund (2018) document, is to 'Increase housing supply by supporting more development on small sites'. Councils can bid for some of the money for: preparing and commissioning Housing Design Codes, undertaking or commissioning studies to identify or allocate small sites suitable for residential development within the borough, developing delivery strategies to unlock development of small sites, and developing proposals to enable councils to support individuals and communities who want to build their own home. The GLA's initiatives and measures to support development on 'small sites' does not in principle provide any support for conclusions on the specific targets proposed as part of draft Policy H2. Many of the measures and elements of the programme are not directly related to the planning policy process and so also cannot in their own right be considered a specific alternative to the policy.

9.18 The potential outcomes of this additional support may provide a clearer indication of the types and scales of development opportunity that might appropriately be supported to contribute towards future development outcomes. However, it is also the case that solutions often precede the planning process in terms of confirming the desire to make land available.

9.19 The practical finding is for the need to set out problems and potential solutions to the development process on 'small sites'. This will need to address a diverse range of factors but may indicate the need for a longer-term and more comprehensive view. Awareness of such programmes and the outcomes that could be achieved might otherwise therefore form part of the development of the evidence base for a specific policy approach.

9.20 The potential benefits are significant in terms of facilitating the process of site identification and assessment. This would include (for example) confirming the absence of key constraints and the viability of development as well as recognising with greater certainty the potential contribution to the development pipeline. As the mix of development on 'small' and 'large' sites evolves the development process may be able to establish the potential burden on and future contribution towards obligations such as infrastructure funding or to secure affordable housing delivery.

9.21 The overall volume of development arising as a result may nonetheless be significantly more limited than indicated by the proposed 'small site' targets suggested in the draft London Plan. These processes would also potentially demonstrate a fairly high burden of resources relative to development capacity. However, there is potentially a much greater adherence with the requirements to accurately assess development through *windfall* sources in terms of the prospect of reliable supply and to echo what has consistently become available. Furthermore,

there is the potential for specific opportunities to be supported through site allocations.

9.22 It should be noted that it would be too soon to take a view on the specific extent to which these measures or alternative approaches would actually boost supply or how quickly additional development can be secured. In many respects the greater support that may be provided may represent only **a means of overcoming existing barriers to development**.

9.23 Caution should also be levied to recognise that there may be a significant conflict with the current approach to provide a 'modelled' estimate of capacity on small sites. The range of ten pilot sites launched have all received tender submissions from interested parties that are under review at the time of writing. Within this small sample two in-fact exceed the 0.25 hectare definition of 'small sites'. At the opposite end of the spectrum six are no larger than 0.05 hectares, which in some cases represent part of the curtilage of existing residential buildings. Whilst the support for these opportunities is encouraging they would typically provide relatively small capacities for development. More importantly, their characteristics are consistent with the 'modelled' elements of the 'small sites' target (i.e. development coming forward as a measure of existing housing stock). Such supply could not be considered additional to the proposed 'small sites' targets. In the event that relevant sites could accommodate a capacity over ten units they could in-fact present issues of ***double-counting*** and conflict between the relevant components of the targets comprising 'modelled elements' and past trends.

10. Stakeholder Engagement

This Chapter provides findings on a stakeholder engagement exercise undertaken to seek evidence from the widest possible range of parties involved in the delivery of small sites and provide the broadest possible overview of the development process. It provides valuable additional information on factors influencing current trends in development. By extension it illustrates whether the proposed approach to draft Policy H2 is likely to provide a reliable measure of future supply and goes far enough to support solutions for increased delivery on 'small sites'.

Objectives and Relationship to the Brief

10.1 The planning permission data used so far in this study gives a picture of small site delivery from 2004 onwards. To gather a full picture of small site delivery, it is important to gather stakeholders' views in order to provide an up-to-date assessment of issues relating to small sites. The findings presented in this section have been collected from a questionnaire which sought stakeholders' views on the proportion of activity on sites under 0.25ha (and fewer than 10-dwellings), timescales for development and barriers to delivery. The questionnaire also pursued views on perceived future opportunities in terms of type and scale of development, allowing the project to evaluate these against the criteria and objectives of the presumption in favour of small housing developments.

10.2 It is also considered important to gather stakeholders' views in order to establish whether the stakeholders found similar issues to the concerns brought to light in the literature review, such as:

- constraints on the capacity of the industry and a potential decrease in opportunities for certain types of activity on small sites (especially conversions);
- the number of unimplemented planning permissions and understanding the reasons schemes are revised or not delivered at all;
- the role of existing policy acting as a barrier to delivery;
- the impact of other development standards and obligations on the delivery process (including CIL and affordable housing contributions); and
- constraints reflecting the availability and cost of land or the overall viability of new development.

Survey Format and Distribution

10.3 Existing stakeholders were contacted and asked to fill out a survey, seeking their experience of small site development. Stakeholders included agents, architects, developers, householders, and landlords. The questionnaire asked thirteen questions, the majority of which were multiple choice questions, however some questions sought qualitative responses. A copy is available at Appendix 3.

10.4 Distribution was undertaken directly by the constituent boroughs using existing contact databases and typically where stakeholders have previously been involved with the planning and development management process in the respective areas. Circulation offered the opportunity to complete the survey via an online platform or to return electronic copy PDFs.

10.5 The aim of the survey was to gather responses from those who have an interest in developing small sites. The questions pertained to the implications of Policy H2 in the draft London Plan, investigating the how relevant stakeholders might respond in terms of the prospects for achieving targets for development.

The Respondents

10.6 26 parties responded to the survey, the majority of whom reported that they were architects (46%). 23% of respondents were agents, of whom the majority were planning consultants. A further 20% of respondents were developers. Respondents also included one landlord and one householder.

Q1: What category best describes your role in the development process?

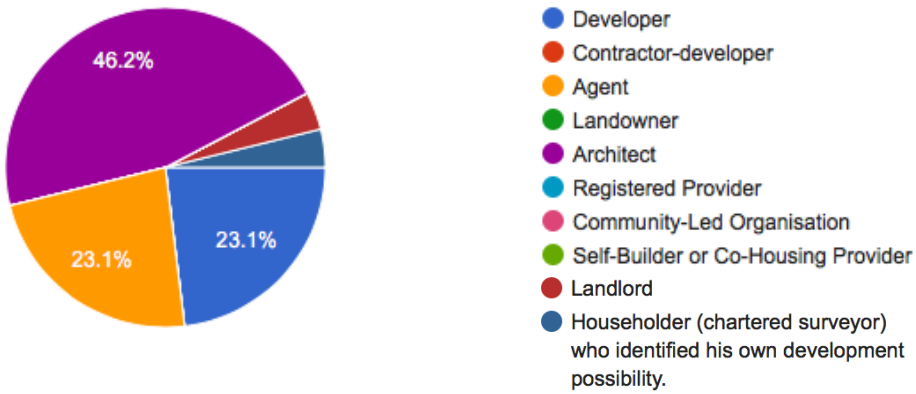

Figure 10.1: Categories of Respondents to Stakeholder Engagement

10.7 Question 2 is one of the most significant elements of the engagement in terms of understanding the volume of activity carried out by individual stakeholders. Responses are heavily concentrated towards those bringing forward development comprising relatively modest contributions in terms of net additional units. 46% of respondents stated they took forward up to 25 units per twelve-months, rising to 61.5% of the respondents (sixteen of 26 responses) reporting they take up to 50 residential dwellings through the planning process in a year on average. 83% of the developers and 63% of the architects who responded to the survey fall in this category. 50% of the agents who responded to the survey stated that they also fell into this category. The remainder of respondents stating they took forward 50 or more units typically included well-recognised architects and planning agents with a portfolio of projects across London and beyond. It is helpful to keep these distinctions in-mind in terms of understanding the types of development and individual characteristics specified as most relevant in subsequent responses (i.e. as part of 'multivariate' analysis).

Q2: Reflecting your role in development, how many residential dwellings (flats or houses) do you build or take through the planning process in a year, on average.

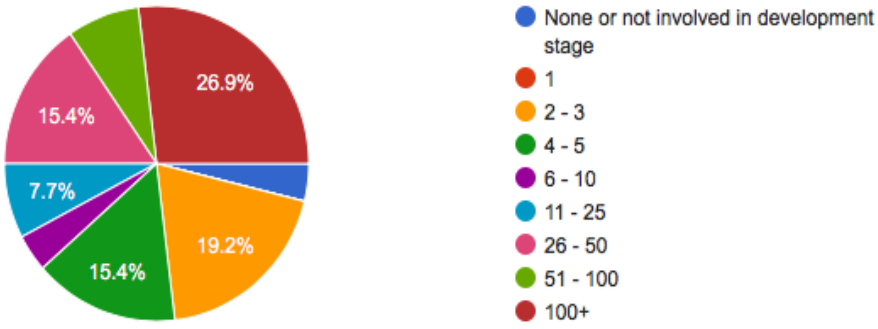

Figure 10.2: Number of Dwellings Taken Through the Planning Process by Stakeholders (Annually)

10.8 96% of respondents had applied for permission or developed sites within the geography of the West London Alliance in the past twelve months. 64% of these respondents applied for planning permission in LB Ealing in the last twelve months. Other popular local authorities where respondents applied for permission or developed sites in the previous twelve months included Brent, Hammersmith and Fulham, Harrow, Barnet, and Hillingdon. Outside of the WLA, boroughs typically associated with high rates of 'small sites' development through 'new build' and Change of Use were specified by a variety of respondents (LB Southwark and LB Lambeth – three responses each). The distribution of results strongly indicates that amongst the total number of respondents many are understandably involved in activity across multiple boroughs in a given twelve-month period.

Q3: In which of the following London Boroughs have you applied for permission or developed sites in the previous 12 months (tick all that apply)

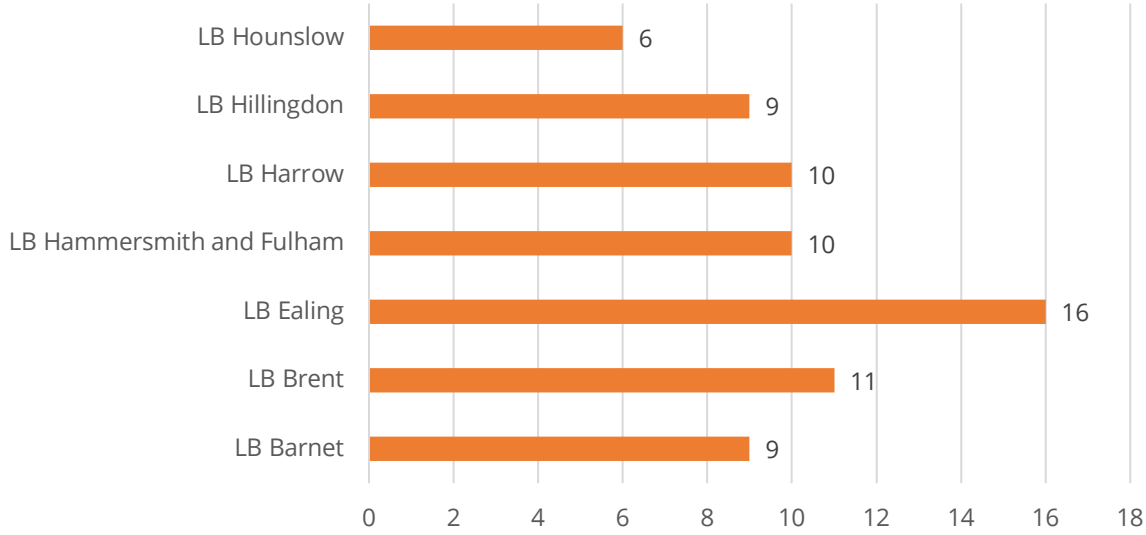

Figure 10.3: Constituent Boroughs Where Respondents Have Sought Permission

10.9 We also sought to find out what types of sites the respondents sought to bring forward for residential development. Types of sites included in the survey were:

A. Infill development of vacant or underutilised sites.

B. Demolition and redevelopment of existing residential buildings.

C. Infill development- within curtilage of existing dwellings.

D. Residential conversions and extensions (including sub-division).

E. Redevelopment of non-residential buildings (including Change of Use and upward extension).

10.10 These categories were drafted deliberately to correlate closely with Part D of draft Policy H2 of the London Plan, with types B-D focusing specifically on opportunities for intensification within existing residential uses. Types A and E relate to non-residential uses and we consider they may not use terminology that is easily relatable to stakeholders in development. For example, whether proposals apply to an under-utilised site (type A) or represent redevelopment (type E) is potentially a matter of judgement. A further issue is that schemes seeking Change of Use of existing premises are not covered by Part D of draft Policy H2 (this has been further clarified by proposed Minor Modifications). We nonetheless included the Change of Use development type within type E to provide an overall view of the level of activity affecting existing non-residential uses, with opportunities to further specify activity across later questions.

10.11 It is interesting to note that the majority of respondents stated that each of the types of development made up between 0-25% of their workload. This reflects how SME builders work on a number of different types of projects and thus why diversity in terms of the opportunities available is so crucial to the overall levels of development on 'small sites'. The total number of responses to each development type is close to the total sample size, indicating most respondents see all as relevant to their portfolio. One potential exception is Type C (infill development within residential curtilage) that appears only sixteen times across the different percentage categories. Only one respondent focused more than 25% of activity on 'residential infill' (or 'garden land') development. This may reflect the position of existing development plan policy, but illustrates that further support for this type of scheme would represent a departure from existing patterns of activity.

10.12 It is also interesting to note that the biggest development category that respondents stated made up more than 50% of their workload was residential conversions or extensions (six of 26 respondents).

10.13 This indicates that there are a number of operators who focus more specifically on the types of residential intensification envisaged by draft Policy H2. Such schemes typically yield relatively few units on individual sites but correlate more closely with assumptions on the re-use of existing stock envisaged by the GLA 2017 SHLAA's 'modelled' approach to capacity on small sites. It is understanding the actual volume of activity undertaken by stakeholders focusing on this type of development that is likely to be most important in determining the achievability of the proposed targets on 'small sites'. We note that five of these six indicated that they took forward fewer than ten units per annum, indicating **limits to the overall volume of development achieved by a focus on these typologies**.

10.14 The respondents were also asked in question 7 what size of site they developed for residential units in the past twelve months. For the majority of respondents, it was reported that larger categories of site size (i.e. 0.11-0.25ha and greater than 0.25ha) saw a decrease in the proportion of their workload occurring on each type and size of residential site.

10.15 This perhaps represents the fact that larger sites *can* take longer to build out, and so SME builders can only take on a certain amount of these sites in any given time frame. Where sites at the larger end of the 'small site' categories are brought forward they may form only part of a wider portfolio. 38% of the respondents (ten of 26) stated that sites of 0-0.1ha made up more than 50% of their residential development in the past twelve months (the modal site size). The respondents in this survey therefore develop the sort of sizes of residential development seen in policy H2, and thus the results capture an up to date picture of small site type development.

10.16 Understandably, all responses indicating that over 50% of activity was on sites over 0.25ha came from those respondents who typically take forward over 100 units per

annum. This corresponds with the view that those bringing forward smaller numbers of units can do so across a number of individual sites, rather than focused on one scheme. **Seven of the ten respondents focusing more than 50% of activity on schemes below 0.1ha deliver fewer than 25 units per annum.**

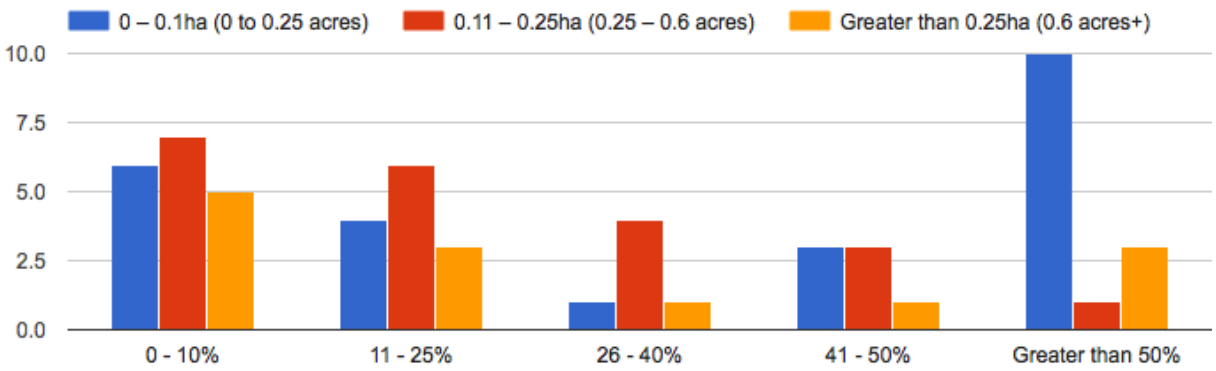

Figure 10.4: Question 7 - Proportion of Units Developed in a Twelve-Month Period by Average Site Size (Count of Respondents)

10.17 Question 8 asked respondents how many residential units they developed on any particular site in the last twelve months. The majority of respondents (sixteen of 26) stated that ten or fewer dwellings made up more than 50% of their workload. This perhaps represents the fact that many of the SME builders work on residential conversions, which provide less residential units on certain sites (see question 6). It is also interesting to note the category 'sites of 26+ units' predominantly made up 0-10% of the respondents' workload.

10.18 The total number of responses to the categories of sites yielding more dwellings (11-25 or 25+ units) is fewer than the overall sample size (i.e. 26 responses) and would suggest that several respondents typically deliver no type of scheme above ten units as part of their activity. Whilst almost all of the respondents who bring forward more than 50 units per year also identified that they also undertook a proportion of work on sites for ten or fewer dwellings this was a small part of total workload. This more select group of larger operators primarily contributes to the actual volume of housing delivered on site over ten units.

10.19 The respondents to the questionnaire thus represent small site type builders working on a variety of site sizes, with varying numbers of dwellings. It is not possible at this stage to indicate the factors that mean the proportion of units delivered on 'small sites' providing eleven or more dwellings is a relatively small component of the total, but such examples clearly represent a fairly small part of a wider portfolio.

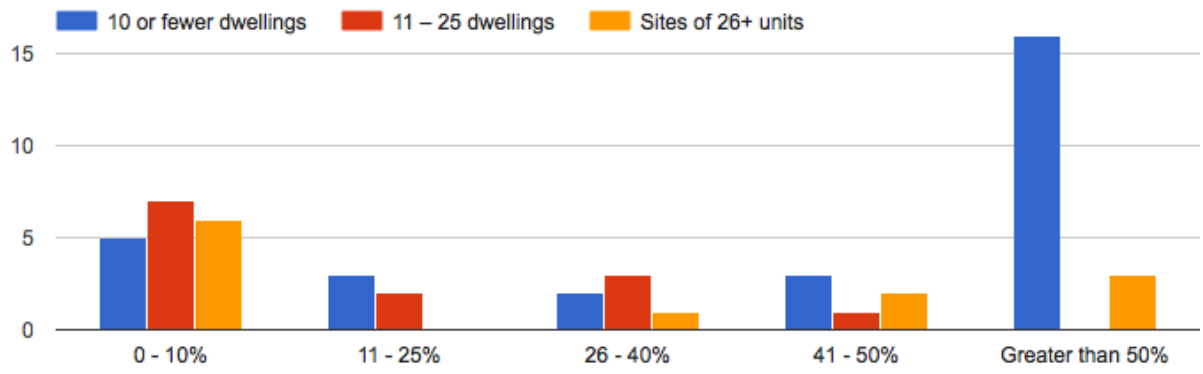

Figure 10.5 Question 9 - Number of Units Proposed on Sites Brought Forward in a Twelve-Month Period (Count of Respondents

10.20 The response to Question 9 sought views on the minimum number of dwellings likely to be sought from the development types A-E. These results corroborate the view on the pattern of activity gained from earlier questions. The modal group for 'infill development within residential curtilage' and 'residential conversions' indicate that a net gain of one unit may be sufficient to promote a particular opportunity. This is also the case for infill development on underutilised sites. The modal 'net gain' figure for demolition and replacement of existing residential units is slightly higher (two - three additional units). **These 'growth factors' are lower than those applied in the GLA SHLAA 2017.** They would correspond with the observation that stakeholders work to bring forward a portfolio of schemes but the net result in development delivered may be modest in terms of each individual operator or individual example.

10.21 A second key finding is that a net gain of 11-25 units was not identified as the minimum yield sought for any of development types A-D, with one response for type E. We consider this is likely to relate closely to the challenges to delivery for such mid-size schemes, including where they cross the threshold for affordable housing contributions. This scale of potential development might also be above the yield typically achievable on sites in existing residential use (i.e. types B-D). Also notable is that the modal group for schemes for redevelopment or Change of Use from non-residential uses is for schemes providing more than 25 units. All these responses were from developers taking forward more than 25 units per annum, suggesting experience of larger-scale development.

10.22 Although the sample size is relatively small, the majority of the respondents to the survey represent small site type developers who have experience of working on several small site typologies within the West London Boroughs. The findings of the survey, in the context of the planning permissions data and the literature review findings, therefore present an up to date picture of small site development in West London.

Summary of Findings on the Development Process

Site Identification including use Brownfield Land Registers

10.23 Policy H2 (part C2) states that boroughs should increase planning certainty on small sites by listing small sites on brownfield land registers (BLR). In order to find out how useful BLRs would be to increasing small site delivery, question 5 of the questionnaire asked stakeholders whether the BLR would improve the identification and level of delivery of small sites in the future.

10.24 Many of respondents answered in the affirmative, with a number of respondents stating that having a list of all potentially developable sites which is available free of charge would improve the identification and delivery of small sites. One respondent stated that it takes a long time to identify sites through research so having a list would help, and others state that the BLR would help to uncover 'hidden sites'. Other respondents thought that the BLR would increase planning certainty for developers which would in turn attract lenders.

10.25 This optimism for the BLR, however, was not reflected in the ways in which respondents identified suitable development opportunities. Respondents to question 4 reported that the most popular way that they identify suitable development opportunities was through introductions from landowners (50%) and land agents (46.2%) or through directly approaching a landowner (50%). Respondents also identified suitable development opportunities through sites appearing at auction or through direct advertisements (30.8%). Only 7.7% of respondents identified sites through a Brownfield Land Register. None of the respondents stated that they identified sites on lists of public sector land holdings.

10.26 There has been no explicit testing of the role of draft Policy H2 (including *the presumption in favour of small housing developments*) in terms of how 'unidentified' sites come forward. The measure of the capacity in the GLA SHLAA 2017 that the 'small sites' targets rely upon may conflict against the current processes of site identification. There appears to be a relatively well-developed range of methods for site identification and acquisition by the private sector, albeit these appear to be time-consuming and potentially incorporate a high 'failure rate' alongside the opportunities that can be secured.

10.27 This may explain the relatively small number of schemes and limited yield in overall units that is achieved by individual respondents. There is also a potential corollary with increased rates of activity on small sites should more stakeholders begin to use a wider range of methods. One implication of any increased interest that would need to be monitored is the longer-term effect on land value and competition.

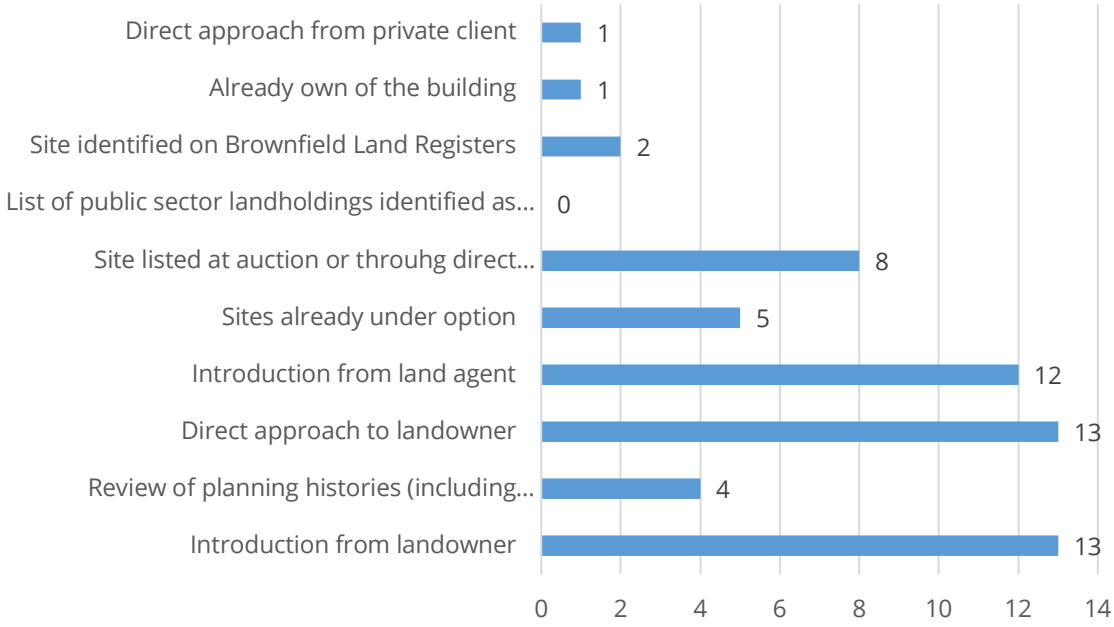

Figure 10.6 Question 4 – Approaches Utilised for Site Identification in the Last Twelve Months (Count of Respondents

10.28 Whilst the *presumption in favour of small housing developments* undoubtedly seeks to encourage residential intensification and remove some of the barriers to development it is far from clear whether measures of capacity will ever correspond with the indication provided by the GLA SHLAA 2017. Realising this capacity is likely to require concerted efforts (and increases in activity) by all stakeholders and we would anticipate this would be concentrated in the preferred methods for site identification listed above. This would, for example, necessitate far more work by relevant land agents or direct approaches to landowners.

10.29 It should further be emphasised that draft Policy H2 in no sense requires homeowners and landowners to ***actually make their property available for development***. Whether developers in the private sector choose to identify opportunities in-line with the capacity estimated by the GLA SHLAA 2017 is likely to be a function of the prospects of acquiring sites as well as the prospects of securing planning permission. It does not presently appear that developers are presented with enquiries from individual homeowners looking to release equity through intensification of their property in anywhere near sufficient numbers to achieve the modelling assumptions behind draft Policy H2.

10.30 The results to question 4 reveal a far weaker role for site identification and acquisition for other potential alternatives, with no respondents indicating that they identified opportunities through use of public sector land. This is potentially significant in indicating a far greater role (compared to current experience) of **alternative measures that might lead to the identification and promotion of land**.

10.31 Respondents' answers to question 5 regarding the usefulness of the BLR in improving identification and level of delivery of small sites may shed some light on why they have not been a popular method of identifying sites.

10.32 One respondent stated that the identification of sites is only a small part of the process of the delivery of small sites; to deliver the BLR sites they would need to be available at a reasonable price. Another respondent stated that BLRs may be useful if the authority would remediate the land and offer it for sale to reduce risk for the developer.

10.33 Those who thought that the BLR would not improve the identification and delivery of small sites cited the cost of cleaning brownfield land as an obstacle. Another respondent stated that the BLR does not reflect availability, suitability and viability of sites and therefore may not help to bring the site forward. This reflects that amongst entries on the BLR there will be examples of sites that already have planning permission, or where consent has previously been in place but lapsed for a variety of possible reasons.

Prospects for Development

10.34 Question 10 of the questionnaire asked respondents which factors they regard as important indicators of development prospects for different schemes, specifically in relation of sites up to 0.25 ha. Respondents were asked to indicate what they regard as indicators for the prospects of success and basis for selecting development opportunities using each of the development types A-E listed in paragraph 10.9 above. This is helpful in differentiating findings and illustrating how the preferred characteristics vary between different types of development on 'small sites'.

10.35 For all development schemes respondents agreed that the likelihood of obtaining planning permission was an important indicator of development prospects. This was echoed in the comments section, which asked respondents to provide other examples that indicate prospects for development. Respondents' comments indicated that they found local planning departments difficult to work with, citing the time it takes to get planning approval as a factor affecting development prospects. Lack of consistency between boroughs was also expressed as an indication of development prospects, with one respondent finding that some planning committees are more difficult in comparison to other boroughs; and some boroughs have more stringent design requirements.

10.36 For all development types surveyed in this study, the size of plot was seen as an important indicator of development prospects. This potentially reflects the findings in the literature review regarding the viability issues associated with small sites in terms of ensuring a sufficient amount of development is achievable. Several respondents also cited site value/cost as a significant indicator alongside the size of

plot obtainable, illustrating this relationship between development cost and gross value achievable.

10.37 It is interesting that **the ability to acquire the site with existing planning permission was not cited as a particularly important indicator** of development prospects. This reflects the literature review's findings, in that existing planning permissions on sites are not necessarily sought with development in mind, but rather to increase the sale price of land, and therefore do not have a significant effect on development prospects.

10.38 We would highlight that the findings for different development types A-E indicate a slightly different emphasis in terms of the relative importance of draft Policy H2 and its spatial criteria (i.e. Town Centre and Station buffers).

10.39 It is interesting that respondents cited the proximity to nearby Town/ District/ Neighbourhood centres, the quality of nearby amenities and the availability of public transport as important factors indicating development prospects for all development types surveyed in the study, but these are most frequently cited for Type E ('redevelopment and Change of Use'). This may reflect the typical spatial concentrations of non-residential activity, the more limited availability of parking and the relationship with other examples of higher density or flatted development.

10.40 For Types B-D (covering existing residential uses) the proximity to Town Centres and availability of Public Transport was identified as important by approximately 40%-60% of respondents. These factors appear to be one of multiple considerations. For example, for the 'residential conversion' development type **the availability of Permitted Development Rights** (eight of 26 respondents), **scope for extensions to plot coverage** (eleven of 26 respondents) and **scope for basement or upward extensions** (thirteen of 26 respondents) was of similar importance (noting that not all respondents are involved in these development types). For 'infill development within residential curtilage', the ability to provide car parking (eleven of 26 responses) was amongst the most important indicators.

Barriers to Development

10.41 Question 11 asked respondents which factors they regarded as the most common barriers to development prospects for different types of small site type development schemes. For all development types the cost of the site, the availability of sites for development and the availability of finance were regarded as barriers to development, echoing the findings of the literature review. This was a broad question and confirms that multiple potential barriers to development are recognised by individual respondents; in general, no one key constraint overrides other factors. It is important to point out that the overwhelming majority of barriers stakeholders were offered the opportunity to highlight are either not related to planning control directly or are not matters that draft Policy H2 seeks to address.

10.42 The responses to question 10 indicated that the speed of obtaining planning permission was an important indicator of development prospects. The responses to question 11 expand on this and appear to apply to all development types. This was reflected in the findings of question 12, which asked respondents to indicate typical timescales for each stage of the development process; **a third of respondents stated that obtaining planning permission took more than nine months** (41% of whom reported that obtaining planning permission took longer than eighteen months). However, **the modal time for obtaining planning permission was three - six months**.

10.43 Echoing the findings in the literature review, both the impact of CIL and the requirement to reapply for or revise existing planning permission were regarded as barriers to development for all development types and identified by around a third of respondents.

10.44 Relative to other barriers, these indicators received marginally fewer responses than more fundamental constraints to site identification and acquisition earlier in the process. Particularly for Type B (demolition and replacement of existing residential units) **site availability** (eleven of 26 respondents), **site cost** (thirteen of 26 respondents) and **achievability of a sufficient net gain in dwellings** (ten of 26 respondents) suggest fundamental limits to capacity. These factors were only marginally less significant for Types C and D ('curtilage infill' and 'conversion'). Limitations on the availability of finance affect all development types relatively equally.

10.45 It is notable that CIL, whilst potentially significant as a barrier, was raised less often than **the specific impact of planning obligations (including affordable housing)** and may represent a more easily understood element of development costs. Fifteen of 26 respondents flagged this for Type E ('redevelopment and Change of Use') which represents the most common answer to any one barrier. This correlates with our findings that relatively fewer developers stated that they focus on schemes between 11-25 or 25+ units, which typically represent the threshold for such contributions. The

impact of obligations is nonetheless seen as significant across all development types. One respondent specifically stated in the comments section that unrealistic affordable housing targets make sites unviable for bringing new housing forward.

10.46 Existing planning policies, both design and development standards and the principle of establishing development were also cited as barriers by the respondents. Evidently it is part of the objectives of draft Policy H2 to remove some (but not all) of these potential impacts of the planning system as a barrier to development on 'small sites'. Responses indicate that control over the principle of development is significant (i.e. nine of 26 responses for 'curtilage infill' and ten of 26 respondents for 'residential conversion') but this actually represents less than half of the sample. We also do not have full knowledge of where respondents look to bring forward sites (i.e. many may be outside Station or Town Centre buffers) so the *presumption in favour of small housing developments* would not establish support in all cases.

10.47 Existing policies on design and development standards are raised as an equally significant barrier to development. It does not appear to be the intention of draft Policy H2 to undermine these safeguards (i.e. in terms of space standards and amenity space). This indicates that there may remain examples of potential opportunities where these cannot be achieved, and development is restricted as a result.

10.48 Qualitative responses to question 11 reiterated that the uncertainty of gaining planning permission and the expense of upfront costs related to surveys, viability studies and reports before planning is approved are major barriers to delivery, mirroring findings from the literature review. One respondent suggested that simplifying the pre-application process would help to reduce the cost barriers of the planning application process, as it would enable developers to find out whether proposals are acceptable in principle.

10.49 Question 13 asked stakeholders to provide comments on their experience with the development of small sites. The comments here reiterated that the planning application process takes too long and is too complex for small sites to be viable, with one respondent stating that stream lining and speeding up the planning process would enable more properties to come to the market.

10.50 As part of our Delivery Workshop with Officers from the constituent boroughs it was highlighted that the capacity and experience of stakeholders focusing on the development of small sites would need to be considered. This is corroborated by the survey findings in terms of the number of respondents bringing forward relatively few schemes and units.

10.51 This is likely to limit a comprehensive understanding of the development management and planning process in terms of: the technical requirements for development; the need for additional studies or surveys; and the statutory timescales for relevant stages (including the input from other statutory consultees). It is

therefore potentially not the case that all barriers will be removed from the measures in draft Policy H2 and would require an increase in capacity and knowledge across wider stakeholders.

10.52 We regard the findings on Question 12 particularly helpful in terms if illustrating the need to allow realistic timeframes for each stage of the development process. This is typically something that respondents provided a clear view on and reiterates that this realistic understanding of impacts on delivery timeframes (in associated with a step-change in capacity) has not been fully explored as part of draft Policy H2.

10.53 The modal responses for the 'site acquisition' and 'scheme preparation' stages (both zero - three months) indicates these can be achieved relatively promptly on suitable sites. Responses on the timescales for obtaining consent are highly varied, as discussed previously.

10.54 Once first permission is in place respondents have provided clear views that further time should be allowed for before units are completed. Thirteen respondents indicated that between six- and twelve-months elapse between permission first being granted and commencement of development on site. Eight more respondents said this stage could last between twelve months and over two years. This is likely to provide a realistic view of stages such as Discharge of Conditions and potentially the need to revise consent. Only two respondents indicated that the build-out period from commencement could be completed in under six months. The modal response (ten respondents) **was a twelve-eighteen-month build-out period** and the next common categories were **nine-twelve months or eighteen-24** months (both six respondents). Using the modal answer for each stage (taking the upper end of the timescale range) would give a broad average timescale for 'small sites' development as follows:

Stage	**Time Allowed**
Site Identification / Acquisition	3 months
Preparation of Scheme	3 months
Obtaining Planning Permission	6 months
From first permission to Commencement	9 months
Build-Out Period to Completion	18 months
TOTAL	**39 months**

Table 10.7 - Question 12 – Stakeholder Responses for Average Time Allowed at Each Stage of the Development Process for 'Small Sites'

10.55 There are likely to be schemes much quicker than this while others will take longer (if they are implemented at all). The findings nonetheless correlate closely with our findings through the London Development Database and strongly support the need for a realistic view on the actual ***delivery*** arising through the proposed approach to draft Policy H2, as opposed to the GLA 2017 SHLAA's role in measuring ***capacity***. This is an essential component in understanding the ***reliability*** of supply and supports a view that a different approach should be applied to the 'small sites' targets in the draft London Plan. The combined factors indicate that a significantly reduced figure is necessary to provide a more realistic estimate of the contribution towards future supply, particularly in the shorter-term.

Conclusions on Stakeholder Engagement

10.56 We consider that engagement has been a valuable exercise and reveals a relatively well-developed picture of parties involved in the delivery of 'small sites'. It is evident that a range of stakeholders are involved in the process with a diverse range of experience of different development types. Ultimately the feedback from stakeholder engagement complements an understanding of the main influences on current trends in activity and a broader view of the development process.

10.57 The findings are regarded as corroborating the assessment provided by this wider project in terms of factors affecting development and barriers to delivery that are both contrary to the achievability of the proposed targets for 'small sites'. Stakeholders benefit from a wide range of opportunities for development that each seem to have an attraction to some parties and are actively sought as part of delivering housing.

10.58 It must sensibly be concluded that some stakeholders actively seek to provide housing on very small sites and draft Policy H2 will be of some benefit in supporting the principle of this approach. However, given the diversity of opportunities these benefits will not extend across stakeholders' wider portfolios.

10.59 For many of the issues identified and development types pursued there is no strong indication that draft Policy H2 offers a comprehensively assessed solution or policy approach. Its proposed measures and intended outcomes in terms of delivery do not appear to correlate with or be supported by evidence to demonstrate that other impacts on the development process will not remain significant.

10.60 This includes extensive feedback on issues such as the volume of development achieved taking account of **timescales, availability of sites and the development management process**. It also appears the case that where opportunities do exist they will not necessarily correlate with the spatial criteria of draft Policy H2, which could have impacts on outcomes from sustainable development. It is also notable that some stakeholders express the merits of alternatives for site identification such

as the BLR but the specific contribution to output from these sources and their support by draft Policy H2 seems limited compared to simple measures of capacity.

10.61 Our overall view is therefore that the experience of stakeholders indicates it is highly unlikely that the proposed 'small sites' targets for housing development could be achieved from 2019.

11. Conclusions on Delivery

This Section provides the key points identified within the overall analysis of delivery trends and the development process. The intention of these conclusions is that they should be applied as part of the project's wider findings on the development of 'small sites'. The nature of findings on delivery could be taken forward and applied in a range of ways to provide the necessary comprehensive evidence base for the prospects and impacts of increased levels of development on 'small sites' and develop specific policy alternatives.

Headline Contribution to the Small Sites SHLAA

11.1 The methodology applied to analyse trends in delivery is an essential part of the 'small sites' Strategic Housing Land Availability Assessment (SHLAA process). The Part A Critique initially covers in-principle concerns with the proposed policy approach to support substantially greater levels of development on 'small sites', particularly in Outer London. Our findings on delivery and the development process confirm and expand upon many of these concerns. Data exists to justify legitimate concerns over omissions or mis-representation of development trends in the evidence base for the London Plan.

11.2 It is an essential component of national policy covering the identification of a 'windfall' allowance for development on unidentified sites that such examples have consistently become available and will continue to form a reliable element of supply. It is the role of any Strategic Housing Land Availability Assessment to provide robust evidence as part of the ability to substantiate such allowances. The starting point for this inevitably needs to allow for existing data to be considered.

11.3 The GLA 2017 SHLAA provides some understanding of past trends but principally relies on the basis of a 'forecast' approach to predict future trends and model estimates of capacity. Whilst not inappropriate in principle the Part A Critique confirms that this methodology lacks clarity and overlooks factors affecting development as well as an understanding of wider impacts on development outcomes.

11.4 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 and is unlikely to be delivered in practice. This forms the starting point to base further concerns based on experience of delivery. The subsequent findings indicate support for a significant downward revision of any prediction of delivery compared to the assumptions that inform the predicted capacity for development.

11.5 Our findings on delivery further indicate that the approach to developing predictions based on future trends does not have sufficient regard to comprehensive evidence available to inform the SHLAA. This remains a requirement of national policy irrespective of whether a 'forecast' approach or projected past trends are relied upon. In either case, views on the recent experience of the development process may have to be adapted to accommodate different impacts on the net housing delivery achievable, such as changes in legislation or the economy.

11.6 The particular concerns highlighted indicate that **the approach currently proposed in the draft London Plan cannot be considered 'sound'**. The conclusions keenly stress that while analysing delivery is principally a reflection of past trends and existing activity, the importance of this evidence should not be understated. A more fine-grained understanding of how development comes forward confirms a range of conflicts or omissions from taking a 'forecast' approach to the capacity on 'small sites'. Further issues regarding the soundness of the plan arise from the introduction of the Housing Delivery Test, which imposes far stricter requirements to assess whether housing is delivered. It would, therefore, be considered inappropriate to make a plan based on a measure of supply/capacity.

11.7 The reasons to have greater regard to consistent evidence of delivery identifiable through this SHLAA assessment are varied. However, a number of features appear to be of sustained importance. These include:

- Each individual record for approved development does not equate to a unique location for development – multiple schemes are recorded on some sites.
- The 'modelled' elements of small site capacity make a relatively modest contribution towards past levels of supply and their relatively weak spatial relationship with Town Centre and Station Buffers.
- The need to acknowledge that timescales for development may be lengthy and not necessarily quicker than on larger sites.
- Accounting for a substantial gap between the level of records for development approved on 'small sites' and their translation into completed schemes – the 'implementation rate'.
- The 'partial pipeline' for supply on 'small sites' that will substantially comprise delivery in the early years of 'small sites' targets from 2019 captures current trends in features such as Permitted Development Rights more than increased demand for smaller 'new build' and conversion schemes. Further, many London Boroughs have Local Plan examinations ongoing that will introduce new policies, and potential conflicts at advanced stages of preparation

11.8 The strength of our findings and demonstration of the regard that should be had to a detailed understanding of the development process is not limited to these headlines. We have indicated that many of the constituent boroughs' concerns

regarding the appropriateness of the GLA 2017 SHLAA methodology are justified. Its relevance to accurately predicting capacity on 'small sites' whilst also looking to safeguard development standards is limited. This is evidenced through confirming that not all sites proceed in the same way or represent equal opportunities for development on 'small sites'.

11.9 For example, we have confirmed numerous examples of development types and outcomes not supported by the proposed approach to draft Policy H2, but are important to current delivery trends in the WLBs.. This includes examples of sub-division of flatted property and Change of Use not supported by the policy's criteria e.g. loss of Public Houses, however are taken into account in an approach purely relying on past trends. In other respects, the GLA 2017 SHLAA sample of completions data has taken account of records outside of normal planning control, such as Certificates of Lawfulness for Existing Use and Development. We have further indicated the value of showing that the overall record of activity includes many pressures on the use of housing stock that counteract potential net gains through small sites. These include examples of 'de-conversion' and the Change of Use of single family dwellinghouses to HMOs. It is, however, important to note that a past trends approach to delivery may over-estimate housing delivery from the sub-division of flats, as trends change over time, specifically in regards to complying with space standards.

Adjusting the Contribution to Supply

11.10 The implications for the actual level of delivery likely to be achieved provide the basis for applying a significant **adjustment** to the 'small sites' targets in Table 4.2 of the draft London Plan. We briefly consider the format such adjustments may take.

11.11 The importance of factors affecting delivery alongside exist alongside our findings in the Part A Critique on the much wider range of factors affecting capacity than has been acknowledged by the GLA. We are therefore unable to accept the 'modelled' approach to the small sites target in the draft London Plan as an appropriate starting point. As a simple conclusion it is clear that this is likely to significantly overstate capacity.

11.12 Given the importance of this conclusion it would be inappropriate to suggest that the GLA 2017 SHLAA provides a realistic starting point of 'unconstrained' capacity that might be reduced for the reasons identified. This could be the case if a far more nuanced approach was taken where individual boroughs retained greater control over relevant inputs. In the absence of such evidence, greater emphasis should be placed on a traditional approach to 'windfall' assessment.

11.13 This would start to account for the essential difference between ***capacity*** and ***delivery***. However, a single adjustment figure by development type or scale is difficult to determine. One potential guideline could be recognition that around 30 to 40% of

approval records are not implemented and at the same time 30 to 40% of records are not the only entry at a given unique address. However, other reductions may be needed to account for schemes outside of planning control or resulting in zero net gain; also depending on the outcomes draft Policy H2 looks to support.

11.14 The diversity and complexity of findings on the development process provides strong justification why an overall projection of past trends contributing towards future rates of development may be a more sensible approach. The sustained nature of some of the elements of the development process that have been identified indicates that the ability to provide solutions and further opportunities for major shifts in levels and patterns of development is more limited. The essential finding here is that even if a different, potentially lower, measure of 'capacity' was used to inform modelling assumptions, draft Policy H2 alone is unlikely to sufficiently boost delivery to meet any such benchmark.

11.15 However, this should not overlook that drivers on the demand for different types of development and factors affecting the delivery of housing do change over time. To this extent the findings from the delivery analysis provide an iterative input to the Critique. This is discussed further below.

Alternative approach to Policy H2: A 'Policy-Led Shift'

11.16 Having taken into account the various findings on delivery presented in the research report we have concluded that significant weight should continue to be placed on past trends as a reliable predictor of future levels of development on small sites. However, it is acknowledged that these trends do fluctuate over time due to various factors including changes to policy and legislation, the availability of suitable opportunities and market demand. It is evident that draft Policy H2 seeks to implement a raft of potential measures to support supply on small sites that could influence trends over time. However, we have found no compelling evidence that the measure of 'capacity' used to inform the 'small sites' modelling assumption can provide any confidence in predicting future levels of development. Once factors affecting development and delivery are considered there does not appear to be any sound basis to support the starting point of a 1% yield growth rate assumption as a guide to development activity.

11.17 We acknowledge that there may be some merit in illustrating activity through completions as (broadly speaking) a per annum percentage of the existing net dwelling stock of an area. This is a proxy only; in truth many small site schemes will not affect existing dwellings whereas other records will exist that affect existing property but lead to a net loss of supply. Notwithstanding other significant factors around timescales and implementation, this proxy nevertheless provides some indication of a benchmark for development on small sites. It also has similar flexibility to the GLA's small sites model in terms of identifying any spatial difference in patterns

of activity; and potentially allowing comparisons and future policy goals to focus on specific geographies.

11.18 Given the changes over space and time that we have observed as well as through considering the more detailed characteristics of development (and the overall development process) we cannot support any alternative approach that uses the SHLAA 'yield rate growth assumption' for modelling as its starting point. This has negative effects in terms of seeking to unduly suggest that certain types of small site activity are likely to occur on a much greater scale (i.e. intensification of existing dwellings) whilst simultaneously ignoring other elements that contribute to supply (e.g. subdivision of flats). It is therefore more appropriate to take a net assessment of delivery as the starting point, accepting that the precise circumstances for development on any site are varied.

11.19 We have attempted to use these conclusions as the starting point for a delivery-based assessment of how trends in small site development might change as a result of draft Policy H2, existing factors affecting development, and existing impacts on current trends. Inevitably, no single alternative model will ever provide a precise prediction of future activity. This is a flaw of using any 'forecast' and particularly one dealing with the complexity of development on small sites. However, in suggesting inputs for the prediction our view is clear on a number of key points:

1) There is no basis to suggest a step-change in delivery as required by the proposed small sites targets starting from the FY2019 monitoring year (1 April 2019 to 31 March 2020), which fundamentally undermines the achievability of the ten-year targets themselves

2) A 'policy-led shift', that reflects a progressive stepped approach is likely to be more robust, using measures close to existing trends as the starting point

3) It may, however, be relevant to take account of the existing pipeline of committed supply and any recent higher rates of development on small sites (although for matters such as Permitted Development Rights these may not necessarily be encouraged by future policy)

4) Any assumptions affecting different development types or scale will be broad in nature and the reasons for suggesting an evolution in trends may not necessarily compare closely with existing activity (i.e. there is no specific link as to why increased activity through conversion will occur to follow recent increases in development through Change of Use)

5) It is therefore the case that where such predictions are applied, timescales are sufficiently long and robust to allow for future change in policy and the introduction of incentives for development;

6) It is also not necessarily the case that any increased forecast of supply should be spatially constrained by the 'small site' modelling assumptions. For example, current levels of activity outside of 800m Town Centre and Station buffers might at least be expected to remain part of trends in development with some scope for greater intensification, although it may be appropriate to envisage a lower level of uplift.

7) Our prediction does indicate potential uplifts in activity on small sites as a result of the evidence to support draft Policy H2 and other initiatives to support housing delivery, but for some types of activity rates of development could fluctuate down as well as up. Ultimately though, these uplifts are considerably less than those currently forecast in the GLA SHLAA 2017.

11.20 Annex H sitting alongside this section provides evidence of various specific calculations used to model alternative scenarios taking account of past trends. The results suggest some basis to take account of higher levels of development based on certain trends and anticipate a stepped approach to the application and development of policy in other areas. This is simply one example, whilst the actual rate of small site development will require careful monitoring and review and the uplift in activity is likely to remain highly challenging for all stakeholders. Nevertheless, even with these delivery-led adjustments to acknowledge existing trends and forecast potential increases in future rates of intensification the estimates of development per annum are significantly below those generated by the GLA's own methodology (see Table overleaf).

Borough	DRAFT PLAN			ALTERNATIVE SCENARIO				
	GLA 2017 SHLAA Approach A (8 yr windfall approach)	Draft London Plan Small Sites Target Annualised Average	Draft London Plan Small Sites Target Ten-year Target	Years 1-3 (3 years) Annualised Average	Years 4-7 (4 years) Annualised Average	Years 8-10 (3 years) Annualised Average	Overall alternative ten-year target	Alternative target annualised
Barnet	3050	1204	12040	429	557	727	5697	**570**
Brent	2580	1023	10230	307	350	469	3727	**373**
Ealing	3030	1074	10740	432	543	634	5369	**537**
Harrow	2210	965	9650	345	415	484	4146	**415**
Hillingdon	1760	765	7650	242	339	395	3266	**327**
Hounslow	1810	680	6800	317	407	415	3821	**382**

Table 11.1 A comparison of resulting potential 10-year targets based on the alternative approach outlined above

Application and Scope for Further Analysis

11.21 The relevance of these findings on delivery need to be interpreted more widely. This is an inevitable part of translating a clear view on the impact and evaluation of past trends in activity into a forward-looking prediction or approach to policy-making. It is our opinion that this provides a clearer starting point to evaluate different policy alternatives supported by a more comprehensive evidence base. This is necessary to inform how increased rates of development on 'small sites' can be achieved.

11.22 For many of the issues identified and development types forming part of delivery there is no strong indication that draft Policy H2 offers a comprehensively assessed solution or policy approach. Its proposed measures and intended outcomes in terms of delivery do not appear to correlate with or be supported by evidence to demonstrate that other impacts on the development process will not remain a significant barrier to activity. Based on the research it is clear that the 1% modelling assumption built into the GLA model will not be achieved as it ignores the fundamental issue of delivery and strength in the evidence of past trends.

11.23 We have considered evidence and stakeholder feedback on issues such as the volume of development achieved, taking account of **timescales, availability of sites and the development management process**. It also appears the case that where opportunities do exist they will not necessarily correlate with the spatial criteria of draft Policy H2, which could have impacts on outcomes from sustainable development.

11.24 Practically, it will be the case that there are significant resource implications for all stakeholders, including local planning authorities, to adapt existing processes and increase overall output. In terms of development outcomes, it is also the case that aspects such as contributions towards planning obligations and affordable housing already provide one potential barrier to delivery. From the perspective of local planning authorities this makes the cumulative impact of development difficult to assess and provide for in terms of infrastructure and services.

11.25 It is also notable that some stakeholders express the merits of alternatives for site identification such as BLRs. The specific contribution to output from these sources and their support by draft Policy H2 seems limited compared to the simple measures of capacity applied. We have also reviewed the extent of focused interventions such as the GLA's 'Small Sites Small Builders' programme and note this looks to address aspects of the development process outside of planning policy.

11.26 This supports recommendations to build upon the Critique that a framework of measures to boost delivery on small sites is necessary and appropriate in principle but does not accord with national policy and guidance as proposed in draft Policy H2. Scope for intervention already exists outside of the normal planning system through measures such as Permitted Development that already have an impact on outcomes. These could be further refined and applied alongside changes to development management.

11.27 Where incentives to increase development on small sites can be provided through planning policy these are likely to be more focused in nature and rely on an understanding of local context. It may be more appropriate to regard existing trends in development as the starting point and illustrate why certain alternatives can make a more positive and reliable contribution to increased housing delivery.

11.28 A useful example would be to identify 'pilot' areas for suburban intensification as recommended by the Outer London Commission and HTA Supurbia Report. Equally, any such testing should be undertaken with an open mindset, prior to any broad application through policy. This is in-case experience confirms the extent of barriers to development and clarifies the most opportunities and extent of support required to promote and manage sustainable development. We would anticipate that greater promotion and use of public sector assets would be likely to play an important role in ensuring new opportunities can be provided for 'small sites' development.

11.29 This may equally take account that some aspects of past trends in development have been harmful and should not continue and also that the pipeline of activity on large sites may affect how the future prospects for small sites are assessed

Appendix 1: Use of Data Employed in Delivery Analysis

Use of the London Development Database

This section summarises how the methodology for delivery analysis is shaped by the availability of data to inform the assessment. It explains how the data was obtained and the specific time periods and the form of outputs chosen for analysis. It also identifies potential issues and illustrates how the 'raw' source data might be used to add further detail to understand patterns of activity and the characteristics of development.

London Development Database

Overview

A1. The London Development Database (LDD) is a system used by the Mayor to monitor planning permissions and completions across London. It has been running since 2004 and is a hugely valuable resource in terms of measuring the effectiveness of planning policy and progress towards meeting development needs. It provides a comprehensive platform in terms of obtaining consistent, good quality data on development trends and planning application activity, from approval through to implementation. In the literature review for this project we identified the specific benefits of the planning application monitoring systems for London in tracking the very high volume of activity across smaller schemes (both in terms of completions but especially the 'pipeline' of potential supply) that is not always highlighted by national sources and submissions to central government.

A2. Information captured by the London Development Database covers data for approvals and completions leading to changes in residential and non-residential floorspace as well as highlighting any change in the protection status of open space. The London Plan Annual Monitoring Report relies on a range of data sources, but, in terms of raw inputs and measures of development activity, information obtained from the LDD provides the starting point to evaluate several of the Key Performance Indicators assessed – and by extension looking to establish the effectiveness of the London Plan.

A3. At the outset and as part of our Delivery Workshop the constituent boroughs were nonetheless keen to stress that their past experience of the LDD reflects this role as

a tool primarily for ***planning and development monitoring***. We would not seek to suggest that the LDD as a resource, and the role of effective monitoring as a whole, cannot form an important element of the policy process. Identifying 'triggers' and mechanisms for review as a result of monitoring data can ensure policies are changed to more effectively manage relevant development outcomes. However, the key questions for this study is <u>whether the robust application of data from LDD can be used to fully test the approach and potential impacts of draft Policy H2; and whether such analysis is fully set out in the GLA 2017 SHLAA?</u>

A4. This project relies on data extracted from the London Development Database to assess patterns of delivery on 'small sites'. To this extent, and in a similar way to the GLA SHLAA 2017, our assessment does aim to test potential policy impacts and evaluate potential outcomes (particularly in terms of the tests in national policy and guidance for windfall development) using information from the LDD. Observations on different development trends and outcomes also provides some evidence to evaluate other potential policy options.

A5. More importantly for the following analysis, we nonetheless identify the data in the LDD is not fully populated with fields that help easily assess the impacts and criteria of draft Policy H2 (i.e. detailed characteristics of development and sub-categories by type and scale). Some of this can be overcome with further processing and applying judgement on records. As a result, the GLA 2017 SHLAA and proposed approach to 'small sites' will inevitably overlook some of the detail in terms of the characteristics of past trends and their potential relationship with the outcomes sought in draft Policy H2. In some cases, as we highlight in the Critique, data employed to support the 'modelled approach' (i.e. the sample of all schemes used to calculate conversion factors) will include records that are not consistent with the presumption in favour of small housing developments.

A6. This emphasises why the analysis of ***delivery*** needs to be read alongside the wider Critique in terms of evaluating the process for testing evidence in the GLA SHLAA 2017 and the proposed approach through draft Policy H2 in the London Plan 2017.

Relevant LDD Criteria and Indicators for this Assessment

Recording 'Approvals' and 'Completions' through the LDD

A7. The LDD is regularly updated with details of new consents being entered shortly following approval. The criteria for data entry require annual updates to information providing details of new residential completions or losses and that this process should correspond to the end of the planning Monitoring Year (i.e. 1 April to 31 March). This allows comprehensive data to be recorded to reflect development **approvals** and **completions**.

A8. Because the LDD records information over the life-cycle of a permission, including the date of permission and expiry date, it is possible to reflect the status of applications as 'Submitted' – i.e. 'not started' following approval, as well as 'Lapsed'. Schemes may also be recorded as 'Superseded' based on confirmation of replacement proposals for a specific site that correspond to details in an earlier consent. The GLA's website explains the process as follows:

- *All relevant permissions are expected to be added within three months of the end of the month in which they were granted. This means that all permissions granted in March must be on LDD by the end of June.*
- *Scheme start and completion dates are checked and updated annually within five months of the end of the year. This means that information up to the end of March must be on the LDD by the end of August*[3].

Criteria for Recording Planning Consents for Residential Development

A9. The LDD corresponds with key indicators in the GLA 2017 SHLAA and the characteristics of development covered by draft Policy H2 of the London Plan, and therefore supports use of terminology consistent with the wider analysis in this project. The LDD monitors all planning consents where they correspond with any of the following criteria:

1. **any new build residential units**
2. **any loss or gain of residential units through change of use or conversion of existing dwellings**
3. creation of seven or more new bedrooms for use as either a hotel, a hostel, student housing or for residential care through new build or change of use

[3] https://www.london.gov.uk/what-we-do/planning/london-plan/london-development-database#

4. 1,000m2 or more of floor space changing from one use class to another or created through new build or extension for any other use
5. the loss or gain or change of use of open space.

A10. It is criteria (1) and (2) that specifically allow activity affecting the net supply of self-contained dwellings to be established and compared with the proposed delivery of housing on 'small sites' as part of draft Policy H2. It is not the purpose of this project to use the LDD to report corresponding outcomes against the other criteria (i.e. resulting change in non-residential floorspace), although in many cases this will be a direct result of the gain (or loss) or residential accommodation.

A11. Criteria (3) relates to outcomes where a planning consent leads to a change in the level of 'Non Self-Contained' accommodation ('non-conventional supply') that is dealt with separately by the GLA SHLAA 2017 and the benchmarks for housing delivery in the London Plan. We do not assess trends in the level and pattern of supply from these development types as part the findings on delivery for this project. However, this criterion has a closer relationship with wider housing needs and pressure across different 'residential' land uses, such as where a net gain or loss in self-contained units corresponds to a change in non-self-contained stock. This would include Change of Use from a residential unit in single family use to a House in Multiple Occupation for over six residents (Sui Generis Use Class corresponding with criteria (3)). Therefore, we aim to highlight where these characteristics of development as a previous or proposed use appear to relate closely to observations in delivery on 'small sites' specifically.

Criteria for 'Development Type'

A12. The LDD utilises a 'development type' indicator allowing entry of the following criteria:

- 'New Build'.
- 'Conversion'.
- 'Change of Use'.
- 'Extension'.

A13. Reporting of planning consents within the LDD can be undertaken against these criteria as a starting point. The criteria (excluding 'extensions') can all be read across with analysis presented in the GLA SHLAA 2017. These are also sensible criteria in terms of highlighting different development characteristics and correspond closely with the proposals in draft Policy H2 in terms of the types of activity supported on 'small sites', subject to other qualifying factors.

A14. In the Part A Report, we confirmed that previous iterations for the GLA SHLAA established a methodology for identifying development within a residential curtilage i.e. on 'garden land'. This is not a separate 'development type' classification within the LDD and comprises separate data fields on the details of existing use ('residential') and existing residential units within the scheme total. Hence, a key qualifying criterion is when 'new build' residential development is proposed on existing residential sites with zero existing dwellings affected. It is therefore not a standalone criterion available to the delivery analysis within this project but can in principle be replicated using additional information.

A15. The 'Extension' development type is an exception in terms of criteria available through the LDD and the subsequent relationship with reporting in the SHLAA. This anomaly appears curious, particularly given that Part D (3) of draft Policy H2 specifically supports this development type as part of the upward extension of flats and non-residential buildings. The 'extension' development type is typically attributed to planning consents where the existing land use is 'non-residential' or 'mixed-use' and the gross gain in units is not offset by a net change to other existing property (i.e. through sub-division or de-conversion).

A16. The GLA 2017 SHLAA appears to manipulate 'raw' LDD extracts using this development type criteria by **reclassifying all such entries as 'new build'**. This is not specified in the 'Housing Target Summaries' shared with constituent boroughs but 'Extensions' are not separately detailed within the information provided. We consider the implications for this as part of further analysis on delivery. This may be particularly significant in terms of understanding the extent of additional net dwellings provided through the 'extension' development type and their relationship with other characteristics of development e.g. permission type. It is also necessary to consider how closely this type of activity is likely to relate to the 'modelled' elements of capacity through residential intensification.

Recording by Permission Type

A17. The GLA SHLAA 2017 partially utilises the ability to report on planning consents entered on to the LDD by permission type. The starting point for the sample data used to report past trends in the delivery of 'small sites' in the GLA SHLAA 2017 does not exclude any of the relevant types of permission to be entered on to the LDD. The criteria for entry on to the LDD have been updated to reflect changes in relevant legislation – for example allowing the inclusion of 'office-to-residential' conversion through rights for Permitted Development.

A18. The GLA 2017 SHLAA utilises this breakdown by 'permission type' criteria to specifically exclude the contribution of 'office-to-residential' conversion from projected future trends (e.g. see Paragraph 6.5 of GLA 2017 SHLAA). However, we note that the GLA 2017 SHLAA does not otherwise differentiate the basis for entry on the LDD based on the criteria for other types of relevant permission and no other categories are excluded from the overall analysis on past trends. This means that (for example) the gain or loss of dwellings through Certificates of Lawfulness for Existing Use or Development, or permissions with a temporary lifespan, are treated equally alongside entries with full permission. This also means that all self-contained residential units that are in-principle recorded as 'C3 residential' even when they are ancillary to another use class (e.g. a caretaker's house or 'granny annexe') are not recognised differently by the GLA SHLAA 2017. For these reasons it is relevant that our delivery analysis considers the characteristics of development by permission type.

Data Recorded for Individual Planning Consents

A19. This sub-section addresses a key distinction in how data is entered into the LDD and the scope for delivery analysis undertaken by this project. Data for relevant consents is assembled from information addressing details for the characteristics of development at **'unit level'**. This allows separate features to be entered to record unit type, unit tenure and bedroom number as elements required to allow more detailed reporting on information contained within individual consents.

A20. For data entry at **unit level** the LDD also allows more than one development type to be entered against individual planning consents. This can be helpful to differentiate characteristics of development within an overall proposal – for example an 'extension' component delivers new 2-bedroom flats above an existing non-residential use whereas the existing building is converted (through Change of Use) to self-contained bedsits. Unit level is also helpful (particularly for larger schemes) as it allows commencement of different elements of a proposal to be reported (and where relevant recorded as completed) within different monitoring years. This is particularly important for annual reporting against the delivery of housing benchmarks.

A21. A summary of all relevant attributes entered into the LDD for an individual planning consent can also be extracted at **scheme level**. This represents a more limited

functionality in terms of providing no specific data on unit type or bedroom numbers, although an overall split in total tenure mix (i.e. total of private and affordable units) is available. **Scheme level** information records the relevant permission type and assigns a development type to the overall scheme. Following the implementation of planning permission, scheme level reporting enables recognition that development has 'started' but does not provide an indicator for annual housing delivery i.e. it cannot be used to recognise that a proportion of units within the scheme total may already be complete. The overall net residential loss or gain can be reported once the overall status of a scheme is changed to complete at the end of the development stage.

A22. Given the above notation on how unit level data is entered (i.e. potentially comprising multiple development types per consent) this means an understanding of **hybrid schemes** is important i.e. to recognise where the development type at scheme level may provide a misleading view on development characteristics. We go on to explain the relevance of this distinction to our analysis and use of sample LDD data.

Initial View on Limitations of Use of the LDD and LDD Indicators

A23. Limitations to comprehensive analysis that we would highlight for the purpose of this project are that the LDD only contains data on planning consents. Information that might be obtained from patterns and reasons for the refusal of planning permission are not available within the dataset.

A24. As part of our Delivery Workshop with Officers it was also noted that the LDD may not provide a fully comprehensive record of consents where new residential buildings are provided but there is a zero-net change in the overall number of units i.e. schemes for replacement dwellings. In our experience we found that constituent boroughs generally entered a significant number of these examples of consent into the LDD and that they represent an important characteristic of development in terms of how existing stock is affected by development proposals. However, we appreciate that there may be instances where relevant consents have not been entered and were not considered to meet the criteria for inclusion.

A25. The LDD also does not allow analysis in terms of applications seeking to modify existing residential properties where this does not involve a gain or loss of units (i.e. proposals seeking only residential extensions, whether through Prior Approval or full planning permission). Certificates of Lawfulness for Proposed Use or Development ('CLOPUD') are also not recorded. The constituent boroughs sought to emphasise, as part of our Delivery Workshop, that experience from development management was for significant demand for residential extensions and alterations as well as the provision of outbuildings for properties in single family occupation. We were advised that there had been a significant uptake of increased householder rights for Permitted Development. Assessing these trends, and how they may impact on the

current use and potential effects on opportunities for future intensification of existing stock would require specific analysis at borough-level.

A26. A vast quantity of development activity is captured by the LDD and we would not seek to question the value of this highly important resource. The system has evolved over time and been able to accommodate successive changes to legislation governing the planning process. There are, however, inevitably potential issues with **data quality** that may arise as a result in relation to the data entry process or how specific aspects of Use Class and development type are recorded. We have not sought to 'correct' any records that may have been regarded as containing errors in our view, nor do we believe this affects the overall relevance of findings. However, this should be kept in mind as an inevitable consequence of using a tool initially designed for development monitoring.

The Sample to Inform this Study

A27. Following discussion with the constituent boroughs it was agree that to enable comprehensive, proportionate and realistic analysis of the most important characteristics of development to support delivery analysis the following datasets would be employed, provided through reports extracted using the boroughs' own access to the LDD:

- **'Completions' by Unit Level for FY2004 to FY2015 (1 March 2004 to 31 March 2016)** – a 12-year period corresponding with the GLA SHLAA 2017
- **'Completions' by Unit Level for FY2004 to FY2017 (1 March 2004 to 31 March 2018)** – a 14-year period using the most recent information on completions
- **'Approvals' by Unit Level and Scheme Level for FY2004 to FY2017 (1 March 2004 to 31 March 2018)** – enabling a picture of the 'partial pipeline' for housing commitments reflecting more up-to-date information than was available to inform the GLA SHLAA 2017

11.30 It was further agreed that taking into account the following points the majority of reporting should be undertaken using the characteristics of development established by '**Approvals' data at Scheme Level** for the 2004 to 2017 periods. This was considered to have a number of advantages over solely focusing on completion records or seeking to report activity at 'unit' level:

- **'Approvals'** records allow examples of Lapsed and Superseded consent to be considered, as well as the extant pipeline of 'Submitted' (i.e. 'not started') schemes;
- use of a **14-year period** does not prevent more focused analysis on specific timescales as 'Financial Year' data can be assigned to each scheme level record (i.e. year of permission and year of completion (if applicable));

- **'scheme'** level information can identify more complex development types and '***hybrid***' examples not easily reflected in 'unit level' analysis;
- **'scheme'** level information provides a more focused position against which to reflect multiple consents on an individual site and to ensure the assessment of total proposed units corresponds to draft Policy H2's criteria;
- reporting by unit type and bedroom number was not considered directly relevant to the main objectives of analysis (having not been covered in the GLA 2017 SHLAA) and may be subject to greater issues with data quality; and
- we found very few examples of 'unit level' data for 'small sites' identifying completions across multiple financial years, suggesting a limited loss of detail in analysis of this criteria at **scheme** level

Comparability with Evidence Informing the GLA 2017 SHLAA

A28. As part of the inception and foundations for this project we were able to confirm access to the datasets used to inform the GLA 2017 SHLAA's findings on past trends in the delivery of small sites. In the Part A Critique we explore this information in more detail and note also that these datasets inform inputs to the 'modelled' elements of the targets for development on 'small sites' targets. The datasets are used to identify which aspects of past trends are removed from the 'remaining windfall' elements (i.e. schemes for 'residential conversion' and 'new build' sites providing ten or fewer units). Extracts from LDD data also inform the 'gross growth factors' applied as part of the modelling assumptions and the source data to assess the pattern of development on 'garden land'.

A29. For the delivery analysis in this project it is important that we take account of the nature of our sample and its comparability with the information relied upon in the GLA SHLAA 2017. The purpose of this is to demonstrate that our findings are applicable alongside the conclusions of the SHLAA when evaluating whether they represent reliable estimates of future supply and assess how past trends in supply that has consistently become available have been interpreted.

A30. The GLA dataset is a record of 'completions' and is reported at 'unit level' for the 2004/05 to 2015/16 period (i.e. FY2004 to FY2015). It therefore includes a number of schemes approved prior to the start of the series. However, the GLA SHLAA 2017 reports against 8-year and 12-year periods. The 8-year period (FY2008 to FY2015) mainly relied on for comparison substantially post-dates the start of the series and a period of four years typically exceeds normal timescales for delivery of schemes. Most of the completions in the 8-year trend are likely to have also been approved within the FY2004 to FY2015 period.

A31. We initially undertook a match between the '**completions'** extracts provided by the constituent boroughs and the GLA 2017 SHLAA dataset. Whilst the LDD is a 'living' resource and information may be changed retrospectively, this match found

(understandably) that the data we were provided almost exactly replicated the trends in completions relied on in the SHLAA analysis. As a result, we were able to use additional criteria from the GLA 2017 SHLAA data (e.g. 'SHLAA development type' and 'garden land' classifications) to supplement the 'raw' extracts we were provided and offer complementary analysis between the two sources.

A32. Analysis of our extract found very limited examples of completions picked up in the 'raw' data but not within the SHLAA, or vice-versa. Those not within the GLA 2017 SHLAA information may have been added to the LDD at a later date. We used the information available through a match with completions at 'unit' level to populate a field within our preferred **'Scheme-level approvals'** series for application references corresponding to the SHLAA dataset. Whilst we have explained the main reasons this dataset will not exactly correspond with the GLA 2017 SHLAA findings (i.e. where 'unit-level' completions span multiple years or data in SHLAA approvals pre-dates 2004) the overall pattern correlates closely for each borough.

A33. We were also able to confirm that the GLA 2017 SHLAA dataset retains 'hybrid' entries (i.e. two or more development types assigned to a single application reference) but this was not specifically picked up by the GLA to enable further consideration.

A34. This section has assessed and clarified the role of the LDD and provides a broad understanding of the nature of planning monitoring information available (as well as its existing relationship to the GLA SHLAA 2017). It confirms the ability to undertake a more focused analysis of delivery seeking to add detail to the characteristics of development on 'small sites'. This forms part of a more detailed interrogation of the approach relied on to inform the targets for development on 'small sites' in the draft London Plan.

Detailed Aspects of the Processing Methodology

Unique Address Identifier and Identification of 'Multiple Applications' on the same site

A35. This is one of the most significant areas for establishing the total level of activity on a specific site (rather than simply analysing each scheme on a standalone basis). By extension, it provides essential information to understand timescales for development and the potential effects of clustering of activity in specific locations. It is imperative for examples such as upward extensions to existing buildings that may already have been converted under PD.

A36. However, the LDD appears to contain no overall indicator to group individual scheme level activity by its address or site location. In the first instance it is therefore only possible to seek to 'match' information contained by the text providing address details (House Number, Site Name, Primary Street, Postcode etc.)

A37. If further opportunity exists from existing single fields in the sample data, it is specifically a function of the borough-level approach to assigning 'Planning References' to individual applications. In some cases, references are assigned based on a site identifier (i.e. derived from Local Land and Property Gazetteer Records) rather than assigned sequentially per annum. We consulted the constituent boroughs on whether their 'Planning Reference' system supported this analysis. Otherwise the following approach was followed.

A38. There are a number of barriers to achieving a perfect indication of 'Multiple Address' records at 'scheme level' but we have employed two methods. The key outcome is a new column on the spreadsheet indicating 'YES' where we identify more than one application on a given address. This was populated using results from the following methods:

1) A Pivot Table based on Count of 'Development Type' and 'Borough Planning Application Reference' following creation of a 'Unique Address' comprising Property Name / Number and Postcode
2) A Pivot Table Based on Count of 'Development Type' and 'Borough Reference' with rows separated by Street Name and a sub-row from Property Name/Number.

A39. Option 1 is more effective as the Unique Address can be added as a column to the spreadsheet and therefore used in a 'LookUp' formula to populate rows at scheme level where the result for 'Multiple Applications' is 'Yes'. Option 2 does not allow this function. Another issue with Option 2 is that it does not account for the fact that there may be more than one street with the same name in an individual borough (e.g. 'High Street').

A40. Both options are potentially affected by inaccuracies in the LDD regarding address level inputs (e.g. incomplete or incorrect postcodes or minor differences in site naming convention). Prior to undertaking this analysis, we have therefore sorted spreadsheets A-Z by street name and property number to try and spot, and correct, any obvious errors, highlighting relevant cells.

A41. It is possible to check the instances identified as 'Multiple Applications' on the same unique site address between the two methods. This is very helpful to check the accuracy of the 'unique address' identifier. We have therefore checked that the 'unique address' identifier does not suggest erroneous instance of 'multiple addresses' using option 2 which would indicate, for example, if an incorrect postcode was applied relative to street name information.

Identifying 'Hybrid' Applications at 'Scheme'-level

A42. The 'Scheme Level' sheet identifying 'Hybrid' records is populated via a LookUp function. This pulls a 'Hybrid' or 'Non-Hybrid' conclusion from a Pivot Table made from the 'Unit Level' sheet plotting a Count of Development Type, which generates one row for each application reference but potentially counts several development types. Whether or not a 'Hybrid' Designation is applied depends on whether the 'COUNT' of development types is greater than 1. This allows a 'LookUp' result to be generated for all rows comprising application references. This is matched to the unique application reference on the 'Scheme-level' sheet.

A43. As a check, we used a 'Unit Level Filter' provided in the original 'raw' data from the boroughs to identify instances of multiple development types, with an added column to confirm that our comprehensive LookUp function has provided the same result (i.e. 'Hybrid' or 'Non-Hybrid').

A44. The identification of 'Hybrid' records is helpful because, when assessing individual applications in more detail, this information signifies that **the typology will be more complex and is likely to incorporate a number of development types**. This does not appear to be a point explicitly acknowledged by the GLA SHLAA.

A45. We have, however, identified that the 'unit-level' data relied on for completion trends in the GLA SHLAA 2017 does retain examples of applications comprising multiple development types. This means, for example, that the SHLAA includes information in past trends for specific development types (i.e. conversion of a flat to two or more bedsits) even though achieving this development might have been co-dependent on the 'Change of Use' from retail-to-residential use on the lower floors.

Match to the GLA 2017 SHLAA Dataset and 'SHLAA Development Type'

A46. Where 'scheme' level data can be matched to analysis already undertaken in the FY 2008-2015 completion series assessed for 'Approach A' in the GLA SHLAA we have identified this within a separate column of the spreadsheet. The match is a simple

LookUp between 'Borough Reference' between the 'raw data' at Scheme Level and the 'Approach A' 'unit level' analysis provided by the SHLAA. The only potential results are either a match with the 'Approach A' data or not.

A47. Where a match exists, we have also imported the relevant 'SHLAA Small Sites Category' employed by the GLA SHLAA. This is important firstly because it indicates where the GLA has classified 'new build' development as 'Garden Land' and also confirms that the GLA has not retained the 'Extension' as an indicator of main Development Type. We can therefore see what this has been translated into (typically as 'New Build').

A48. Generally, the application of the GLA SHLAA 'Small Sites Category' reduces the instances of 'Hybrid' applications but not altogether. We have therefore provided a column to indicate which Borough Planning References remain assigned to more than one SHLAA 'Small Sites Category' – essentially 'SHLAA Hybrids'. This is helpful particularly where it demonstrates the GLA regarded schemes as part 'new build' and part 'garden land', for example.

Populating 'Existing Unit Type' From the 'Unit-Level' Dataset

A49. Matching the designation of units affected by application proposals at 'scheme level' ('Existing Units') is feasible from between unit to scheme level data based on a match of this criteria with the unique borough planning application reference. In most instances there is only one 'unit-level' entry for existing units and therefore the match is effective and use of an 'Index – Array' formula will return a single result for unit type i.e. flat or dwellinghouse. This is a critical part of analysis because we have already established that **the 'small sites' modelling assumptions in the GLA 2017 SHLAA do not rely on the forecast intensification of existing flatted properties**.

A50. Some 'scheme-level' records fail to secure a match because the LDD hierarchy includes multiple rows for existing units – this is typically the case where bedroom numbers are known and multiple entries have been included at 'Unit-level'. This does not necessarily mean that 'Existing' unit designations have more than one type. It is possible to utilise a Pivot Table to check this, which uses Borough Ref as row (1) and 'Unit Designation' as a sub-row. This is filtered so that only 'Existing' designations are shown. Columns use the 'Unit Type' indicator as Header. Values are provided by the 'Existing Units' column, applied as a 'Count'. Entries with no existing units do not have any unit level entry for this designation (for example a 'new build' scheme).

A51. Where the 'Count' is more than 1 it would not be possible for 'Scheme' level Match to provide a unique return by unit-type. However, the Pivot Table shows that for many entries by Borough Reference there are multiple 'unit-level' entries for Existing Unit designations that do not span different Unit Types (i.e. a combination of one-bedroom and two-bedroom flats). In this instance, the Designation of Existing Unit type is known and could be manually imputed or provided by a LookUp Table made from the Pivot Table.

A52. In a similar manner to identifying Hybrid Applications the same Pivot Table can be used to identify 'Multiple' examples of Existing Unit-Type Designations incorporated in the total activity observed at Scheme Level. It is anticipated that in many instances this would represent a strong overlap with applications identified as a Hybrid Type i.e. alterations to existing studios and flats or combination of conversion and replacement of existing flats and houses.

Development Type and Scale Analysis

A53. A key output following processing of the LDD data is to be able to differentiate schemes based on 'Development Type' and the 'scale' of proposals. This is amongst the simplest types of reporting, particularly given that 'Development Type' is an existing criterion for entry onto the LDD.

A54. We have populated fields with the following sub-categories to allow a breakdown by 'Development Type' against the following indicators:

Site Size

- 0-0.1ha; 0.11 – 0.25ha; and greater than 0.25ha

Number of Proposed Units

- 0-10 units; 11-25 units; 25+ units

A55. The criteria are important in terms of identifying any initial relationship between 'scheme-level' data and the effect of the proposed *presumption in favour of small housing developments*. An understanding of the proportion of activity on the very smallest sites (i.e. below 0.1ha) is considered valuable in terms of potentially indicating whether this corresponds to most types of *residential intensification* or if a significant proportion of schemes rely on a somewhat greater site area (i.e. larger backland or infill plots).

Spatial Analysis

A56. Once the data has been processed and further analysed as described above it is possible to produce an intersection between the location of a scheme and the geographic criteria of draft Policy H2 – specifically whether schemes fall inside or outside relevant 800m 'buffers' to Town Centres and Stations. This is possible as each LDD entry contains accurate information on location based on 'Easting' and 'Northing'.

A57. It is important to highlight that the relationship of a scheme to relevant Station and Town Centres buffers is a 'one-to-many' relationship. We have previously indicated through the Critique that any given location in a constituent buffer might fall into several buffers. We cannot therefore assess a total of completions consistent with the overall total through this dataset as a result – firstly because it would be necessary to also 'add-in' all completions not within an 800m buffer of a Town Centre or Railway Station and secondly because the geometry of any individual scheme may fall within

the buffer of more than one station or Town Centre. The latter would potentially lead to 'double counting' in reporting of totals.

A58. The specific value of this analysis is that the report of annual net completions from schemes identified within specific buffers can be compared with the GLA 2017 SHLAA's 'small sites' measure of capacity for development within the respective buffer. This measure is based on a 1% *per annum* proportion of the total number of qualifying dwellings inside the buffer. This information is easily obtainable from the GLA's own source data. We can relatively easily establish whether the actual *delivery* per annum inside relevant buffer geographies corresponds to the GLA's measure of capacity. The starting point for this comparison should be those types and scales of development that correspond to the 'modelled' components of development on small sites covered by the GLA 2017 SHLAA i.e. 'residential conversions' and 'new build' schemes proposing 10 or fewer units. We can use different breakdowns of development scale and type to illustrate why the level of activity in certain areas might be greater as a proportion of existing dwelling stock i.e. because they are also associated with the delivery of more schemes through 'Change of Use' not explicitly covered by the proposed *presumption in favour of small housing developments*.

A59. The further value of this analysis is that it allows the specific pattern of development outcome and trends to be observed at specific locations where draft Policy H2 supports residential intensification and other increased rates of 'small sites' development. The experience of delivery in these locations can be correlated to other factors affecting development that we identified in the Critique. This could, for example, help to understand whether the relationship to indicators of aspects such as 'Character' (defined by the SHLAA Character Map), 'PTAL rating' or 'car ownership' have an existing effect on where development takes place. This further allows us to assess the impacts of draft Policy H2 and potential consequences. These consequences may include the effect on sustainable development of seeking to promote significantly greater levels of development around stations with a poor PTAL rating, compared to existing levels of activity.

Use of Polygon Data

A60. At this stage we have not made use of polygon data to map the actual extent and physical boundaries of individual scheme-level records. This is not a requirement of data entry for records on the LDD. As such, information is available for some schemes and not others and the proportion varies between individual boroughs.

A61. There is a range of potential value for understanding development characteristics based on more spatial data. Further benefits may include:

- Using polygon data to 'capture' examples of multiple applications on an individual site, particularly where address details do not enable a match;
- To confirm the accuracy of details of site area entered into the LDD;

- To confirm the clustering of activity where development takes place on adjacent sites and the characteristics of development may be co-dependent between two locations; and
- To identify where sites of different sizes exist in one location. This may include examples of 'small sites' inside the boundary of a large site (over 0.25ha) and could confirm that the characteristics of development actually relate to provision or support for comprehensive redevelopment at a larger scale

A62. These are not matters addressed within the GLA 2017 SHLAA and in our view based on the availability of data are principally priorities for future research. The importance of understanding spatial characteristics would inevitably increase as part of looking to boost development on 'small sites' and attempting to monitor whether delivery takes place in accordance with the indicators within draft Policy H2.

Understanding the Development Process

A63. The broad objectives of this element of the analysis are to understand the range of information held by the LDD reflecting timescales for development and records of schemes that were approved but either remain undeveloped or were never brought forward. This provides a wider view on the development process for 'small sites' and reflects factors that are not addressed by the GLA 2017 SHLAA in providing a measure of capacity and comparison with specific trends in completions.

Implementation and Application Status

A64. Reporting against the status of applications within the LDD is straightforward and covered by a standalone criterion recording the following categories at 'scheme-level':

- **Submitted –** permission is in place, but development is not recorded as having commenced;
- **Started –** permission has been implemented and lawfully can no longer 'lapse'. At 'scheme' level it is not possible to determine whether for applications with this status a proportion of the total units in a scheme are already complete;
- **Completed –** development has been completed and the total gross and net change in units or floorspace can be recorded towards total completions
- **Superseded –** a more recent (and potential alternative) planning permission has been granted to override the details of potential development recorded at 'scheme-level' for these entries; and
- **Lapsed –** the deadline for implementation of consent has passed and the details within relevant 'scheme-level' entries can no longer be implemented. Subsequent or alternative forms of development may nonetheless be approved or already in place on the same site

A65. Reporting the status of applications to gain a more representative picture of rates of implementation and unimplemented consents has typically been cut-off at 31/03/2015.

A66. The period covering FY 2004 – 2015 provides a more appropriate timescale over which to compare the current status of applications permitted. This compares more closely with the evidence base for the GLA SHLAA and importantly allows a period to allow for typical implementation of consented schemes. This is on the basis that most applications approved on or before March 2015 would now be expected to have been implemented if they are to be brought forward. A high proportion of potential net capacity would be anticipated as being either completed or started at the date of the sample in July 2018. The remainder will represent a realistic estimate of potential net residential gain where schemes approved within the FY 2004 – 2015 period have either since lapsed or been superseded.

A67. If more recent data from approvals was included (i.e. from 01/04/2015 to 31/03/2018) it is feasible that a higher proportion of schemes will remain not started or under construction, but this would more accurately indicate the 'potential pipeline' than a rate of non-implementation.

A68. Analysis will allow us to illustrate whether or not records of unimplemented consent are evenly distributed across 'Development Type' recorded by the London Development Database and whether there are any particular spatial concentrations.

Timescales for Development

A69. The London Development Database contains the necessary information to calculate timescales for development with no further cleansing of data required. Separate data entry fields exist to record the date of permission, commencement, completion and (if relevant) the date at which planning permission will lapse. However, we are dependent on the accuracy of recorded dates for permission and completions as well as the other characteristics of development that have been recorded.

A70. During the Delivery Workshop with the constituent boroughs, Officers felt it necessary to highlight that 'completion' dates may not always correspond with the point at which a unit was actually finished or occupied. This may, for example, reflect that Officers often record completions once annually as part of annual physical monitoring whereas building activity and occupation may occur some months previous. However, for other schemes boroughs rely on secondary data on other sources of information (e.g. completion certificates and Council Tax records) meaning that the completion date may correspond more closely to when works were finished on site.

A71. We have also identified that the need to understand **multiple instances of applications on the same site** may be important to understand development timescales. The comparison of timescales for development will not necessarily be

accurate when comparing only that data for a single scheme entered into the Development Database. This is because such analysis would inevitably overlook other potential instances of applications on the same site where other applications have previously lapsed or been superseded prior to a first completion being recorded.

A72. Therefore, for sites where multiple applications have been identified, we have undertaken separate analysis to demonstrate the timescale between 'first permission' and 'first completion'. By definition, first completions may well not be recorded from the first application. We have also assessed those examples where more than one scheme has yielded completions on what we have identified as a location with multiple applications. In these instances, the dates of first and most recent completions have been recorded; in these cases, it should be noted that completions might span more than one 'Development Type and we have not separately identified whether further outstanding capacity exists on the same site.

A73. These examples would be especially pertinent to cases such as initial Change of Use of premises under Permitted Development Rights and where subsequent schemes deliver a net gain in units from extensions or redevelopment elsewhere on site. We have identified that the GLA 2017 SHLAA does not recognise these co-dependent characteristics of development i.e. where an extension is only facilitated by previous schemes providing for Change of Use.

Incorporating Additional Detailed Characteristics of Development

A74. Section 4 of the main Part B Report ('the processing methodology') introduces the reasons for providing additional classification of scheme-level records to identify detailed characteristics of development. Appendix xx of this report sets out the specific hierarchy of classifications used to record additional details. This section provides some specific examples and illustrations of how the hierarchy applies in practice to different types of record and what this may indicate for overall trends in activity on 'small sites'.

A75. Certain types of scheme offer more scope to identify relevant characteristics. Schemes for 'Change of Use excluding Permitted Development' are amongst the most complex due to greater instances of incorporating potential for partial redevelopment, existing residential uses within the scheme (e.g. on upper floors), potential retention of mixed-uses and potential for other development through Permitted Development elsewhere on the scheme. Our classifications seek to add detail to describe in more detail the nature of proposals providing 'Hybrid' development forms.

A76. For other 'Development Types' the nature of characteristics that can be added using relevant information are more limited so effectively sit lower down a hierarchy. For example, where 'Extension' forms the main Development Type it is relevant to record the type of building operation creating a net change in units (i.e. upward, rear or side). However, data entered into the LDD would not generally reflect any other change in existing land use.

A77. For some developments the role of the hierarchy is to separate or sub-divide relevant characteristics dependent on overall outcomes by development type. For example, where the main 'Development Type' is 'Conversion' we have developed separate classifications based on whether proposals lead to a net gain or loss in dwellings (i.e. a **'conversion' or 'de-conversion'** reducing the number of units). This is also relevant for 'Change of Use' Development Types where the outcome is a loss of self-contained residential units to other uses (e.g. a flat over a shop back to an upper-storey office).

A78. It is not the purpose of adding detail to schemes leading to a net loss of self-contained dwellings to specifically monitor other changes in land uses or floorspace. However, relevant criteria do record broad details in proposed alternative uses and signal their significance and relationship with pressure for other uses i.e. where proposals would lead to a change in the number of HMOs or other 'non self-contained' accommodation.

Combinations of Sub-Categories and Development Characteristics

A79. Multiple sub-categories for classification allow common trends to be recorded as part of development characteristics. This means, for example, that for examples of schemes within any 'Development Type' we are able to record (using the description of development) whether proposals incorporate extensions to existing property as part of the overall package of proposals. This is potentially significant in terms of determining whether the ability to adapt existing property is an important indicator in terms of realising opportunities for intensification.

A80. Use of the hierarchy of additional characteristics provides a macro-level view of more detailed development trends. There has been some evolution of the original list of draft categories shared with the boroughs as a result of the characteristics of scheme level information identified in the LDD and also to try and overcome apparent inaccuracies or inconsistency in the 'raw' data. To some extent, however, we regard the application of the categories as a matter of judgement in some cases where the data solely contained in the LDD does not allow a definitive answer.

A81. We have identified a number of potential issues at 'scheme level' that could lead to disputes over our specific findings. These relate to issues with data quality and human errors in data entry including the incorrect classification of 'Development Type' at the outset. There are also instances of incorrect enumeration of non self-contained accommodation as part of net loss or gain of residential units.

A82. To provide a more proportionate approach to the most complex data at 'scheme level' we have also allowed classification of the data entered as a 'Potential Hybrid'. This category has been created because there seem to be instances at 'Scheme Level' where multiple development types do not exist at Unit Level to create a 'Hybrid' but this is indicated by the description of development i.e. proposals covering Change of Use and Conversion of existing units. This makes analysis of the more complex applications difficult as it means we end up potentially identifying them via two separate columns (one through our analysis and one through the 'raw' data). These examples can often include inconsistencies in terms of overall net change in dwellings. However, we regard the identification of these issues as important to show the complexity of small site delivery. Reporting the total number of 'Hybrids' in a given sample can be provided by summing the total identified in the 'raw' data alongside examples from our own classification.

Appendix 2: Sub-Categories for Classification of London Development Database Records of Approved Residential Development

'Small Sites SHLAA' for West London
Part B: Delivery Analysis
Appendix 2 – Sub-Categories for Classification of London Development Database Records of Approved Residential Development

Change of Use Excluding Permitted Development	***Sub-Category 1***	***Sub-Category 2***	***Sub-Category 3***	***Sub-Category 4***	***Sub-Category 5***
	No existing residential properties identified within description	Not Applicable – No extension or conversion	Development involves part new-build infill within plot or demolition and replacement of existing structures	Other development on site through uptake of rights for Permitted Development	Includes Retention or provision of Mixed-Use
	Proposals also incorporate extension or conversion of existing properties	Includes de-conversion of existing units	Development does not involve part new-build infill within plot or demolition and replacement of existing structures	No Other development on site through uptake of rights for Permitted Development	No retention or provision of mixed-use
	Proposals do not incorporate extension or conversion of existing properties	Does not include de-conversion of existing units			
		Potential change in level of HMO (SG), institutional or other Non-Self-Contained accommodation			

Change of Use - Permitted Development	***Sub-Category 1***	***Sub-Category 2***	***Sub-Category 3***	***Sub-Category 4***
	Prior Approval (Class G - formerly F)			
	Prior Approval (Class M - formerly IA)			
	Prior Approval (Class O - formerly J)			
	Prior Approval (Class P)			

Change of Use – Loss of Existing Residential Uses	***Sub-Category 1***	***Sub-Category 2***	***Sub-Category 3***	***Sub-Category 4***
	Includes de-conversion of existing units	Also includes CoU of Non-Residential Floorspace	Change of Use of existing property - flat	Description potentially refers to HMO (C4 or SG), multi-occupancy or bedsits
	Does not include de-conversion of existing units	Does not also include CoU of Non-Residential Floorspace	Change of Use of existing property – non-flatted	Description does not potentially refer to HMO (C4 or SG), multi-occupancy or bedsits
			Change of Use of existing property type unknown or unspecified	

'Small Sites SHLAA' for West London
Part B: Delivery Analysis
Appendix 2 – Sub-Categories for Classification of London Development Database Records of Approved Residential Development

New Build Development	***Sub-Category 1***	***Sub-Category 2***	***Sub-Category 3***	***Sub-Category 4***	***Sub-Category 5***
	Redevelopment including replacement of non-residential buildings or mixed-use	Proposals also incorporate extension or conversion of existing properties	Includes de-conversion of existing units	Includes Retention or provision of Mixed-Use	Development of other non-self-contained including granny annexe
	Redevelopment or Intensification of Existing Residential Dwellings	Proposals do not incorporate extension or conversion of existing properties	Does not include de-conversion of existing units	No retention or provision of mixed-use	Certificate of Lawful Development
	Development Replacing Residential Outbuildings				
	Development of Garden Land / Residential Curtilage				
	Development of other vacant land including PDL				
	Redevelopment of existing buildings - Use Class unestablished				

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Part B: Delivery Analysis
Appendix 2 – Sub-Categories for Classification of London Development Database Records of Approved Residential Development

Residential Conversion	***Sub-Category 1***	***Sub-Category 2***	***Sub-Category 3***	***Sub-Category 4***	***Sub-Category 5***
	Includes Subdivision of existing property - flat	Scheme includes additional development through extensions (including basement)	Scheme also includes replacement, provision or conversion of outbuildings	Description refers to retention or refurbishment of mixed-uses	Conversion – description potentially refers to HMO (C4 or SG), multi-occupancy or bedsits
	Includes Subdivision of existing property – non-flatted	Scheme does not include additional development through extensions (including basement)	Scheme does not include replacement, provision or conversion of outbuildings	Description does not refer to retention or refurbishment of mixed-uses	Conversion – description does not potentially refer to HMO (C4 or SG), multi-occupancy or bedsits
	Conversion of outbuilding or non-habitable floorspace only				Certificate of Lawful Development
	Conversion – Property type unknown				Conversion Providing other Non-Self-Contained including Granny Annex

De-Conversion of Residential Property	***Sub-Category 1***	***Sub-Category 2***	***Sub-Category 3***	***Sub-Category 4***
	De-Conversion of existing property - flat	Scheme includes additional development through extensions	De-conversion – description potentially refers to HMO (C4 or SG), multi-occupancy or bedsits	Includes retention, provision or refurbishment of mixed-uses
	De-Conversion of existing property – non-flatted	Scheme does not include additional development through extensions	De-conversion – description does not potentially refer to HMO (C4 or SG), multi-occupancy or bedsits	Does not include retention, provision or refurbishment of mixed-uses
	De-conversion – existing property type unknown or unspecified			

Extensions	***Sub-Category 1***	***Sub-Category 2***	***Sub-Category 3***	***Sub-Category 4***
	Upward extensions only to create additional flatted development	No Other development on site through uptake of rights for Permitted Development		
	Rear or side extensions only to create additional flatted development	Other development on site through uptake of rights for Permitted Development		
	Other extensions to existing property to create additional non-flatted development			
	Combination of extensions			

'Small Sites SHLAA' for West London
Part B: Delivery Analysis
Appendix 2 – Sub-Categories for Classification of London Development Database Records of Approved Residential Development

Potential Hybrids (not indicated at Unit Level by Processing Methodology)	***Sub-Category 1 (Select LDD Development Type from Column AE)***	***Sub-Category 2***	***Sub-Category 3***	***Sub-Category 4***	***Sub-Category 5***
	New Build	Description indicates redevelopment, replacement or provision of new buildings	Description indicates Change of Use Class within retained buildings or floorspace (including non-residential to residential)	Description indicates conversion or de-conversion of existing residential units or floorspace	Description indicates any extension or combination of extensions, conversion of outbuildings or infill development
	Change of Use	Description does not indicate redevelopment, replacement or provision of new buildings	Description does not Change of Use Class within retained buildings or floorspace (including non-residential to residential)	Description indicates conversion or de-conversion of existing residential units or floorspace	Description indicates any extension or combination of extensions, conversion of outbuildings or infill development
	Conversion				
	Extension				
	Not Known or Other				

Appendix 3: Stakeholder Questionnaire

West London Small Sites Strategic Housing Land Availability Assessment (SHLAA)

Troy Planning + Design has been appointed to assist the West London Alliance in assessing the draft London Plan's proposals to increase the delivery of housing on 'small sites' and introduce specific targets for this type of development.

The seven boroughs have agreed to use existing development stakeholder contacts details and incorporate stakeholder engagement as a valuable part of this assessment. The consultant team would be extremely grateful if you could complete and return the attached questionnaire. All answers provided will be analysed and reported anonymously.

The draft London Plan defines small sites as those below 0.25 hectares / 0.6 acres. The proposed targets for each London borough for a 10-year period 2019-2029 form part of draft Policy H2.

The purpose of our assessment is to assess both the overall capacity for development and factors affecting delivery on small sites in the context of west London. Input from the development sector will help to illustrate existing patterns of activity and the levels of output currently delivered on small sites. Information on the key opportunities and barriers to development will be valuable in identifying the most effective mechanisms to support the development of small sites and assessing the achievability of the draft London Plan's proposals.

* Required

1. **Please provide the name of your organisation** *

2. **By completing this survey, you consent to your responses being collected, analysed and reported anonymously. No personal information is collected, nor will individual survey responses be provided to the seven West London boroughs. Please acknowledge your consent below:** *

   Mark only one oval.

   ◯ Yes, I consent to my responses being collected, analysed and reported anonymously.

   ◯ No. If you do not consent to your responses being collected, analysed and reported anonymously, please do not complete this survey.

Questions

Q1: What category best describes your role in the development process? *

Mark only one oval.

- ◯ Developer
- ◯ Contractor-developer
- ◯ Agent
- ◯ Landowner
- ◯ Architect
- ◯ Registered Provider
- ◯ Community-Led Organisation
- ◯ Self-Builder or Co-Housing Provider
- ◯ Other: _____

Q2: Reflecting your role in development, how many residential dwellings (flats or houses) do you build or take through the planning process in a year, on average. *

Mark only one oval.

- ◯ None or not involved in development stage
- ◯ 1
- ◯ 2 - 3
- ◯ 4 - 5
- ◯ 6 - 10
- ◯ 11 - 25
- ◯ 26 - 50
- ◯ 51 - 100
- ◯ 100+

Q3: In which of the following London Boroughs have you applied for permission or developed sites in the previous 12 months (tick all that apply) *

Check all that apply.

- ☐ LB Barnet
- ☐ LB Brent
- ☐ LB Ealing
- ☐ LB Hammersmith and Fulham
- ☐ LB Harrow
- ☐ LB Hillingdon
- ☐ LB Hounslow
- ☐ Other: _____

Q4: Which methods have you or your clients typically used to identify suitable development opportunities over the last 12 months? (Select all that apply) *

Check all that apply.

- [ ] Introduction from landowner
- [ ] Review of planning histories (including approaches to sites with existing consent)
- [ ] Direct approach to landowner (including speculative approaches)
- [ ] Introduction from land agent
- [ ] Site already under option
- [ ] Site listed at auction or through direct advertisement
- [ ] List of public sector landholdings identified as potential opportunities
- [ ] Site identified on Brownfield Land Registers
- [ ] Other: _____

Q5: Regarding opportunities identified on Brownfield Land Registers, do you think this source will improve the identification and level of delivery of small sites in the future? Please provide reasons.

_____

_____

_____

_____

_____

Q6: What proportion of residential units you develop in a 12-month period are, on average, provided through the following development types (answers do not necessarily need to sum to 100%):

Check all that apply.

	Infill development of vacant or underutilised site (non-residential)	Demolition and redevelopment of existing residential buildings	Infill development – within curtilage of existing dwelling	Residential conversions or extensions (including sub-division)	Redevelopment of non-residential buildings (including Change of Use and upward extensions of flats)
0 - 10%	☐	☐	☐	☐	☐
11 - 25%	☐	☐	☐	☐	☐
26 - 40%	☐	☐	☐	☐	☐
41 - 50%	☐	☐	☐	☐	☐
Greater than 50%	☐	☐	☐	☐	☐

Q7: What proportion of residential units you develop in a 12-month period are, on average, on sites of the following size (answers do not necessarily need to sum to 100%):

Check all that apply.

	0 – 0.1ha (0 to 0.25 acres)	0.11 – 0.25ha (0.25 – 0.6 acres)	Greater than 0.25ha (0.6 acres+)
0 - 10%	☐	☐	☐
11 - 25%	☐	☐	☐
26 - 40%	☐	☐	☐
41 - 50%	☐	☐	☐
Greater than 50%	☐	☐	☐

Q8: What proportion of residential units you develop in a 12-month period are, on average, on sites providing (answers do not necessarily need to sum to 100%):

Check all that apply.

	10 or fewer dwellings	11 – 25 dwellings	Sites of 26+ units
0 - 10%	☐	☐	☐
11 - 25%	☐	☐	☐
26 - 40%	☐	☐	☐
41 - 50%	☐	☐	☐
Greater than 50%	☐	☐	☐

Q9: What, if any, minimum net gain in dwellings would you seek to achieve when considering each of the following development types (answers do not necessarily need to sum to 100%):

Check all that apply.

	Infill development of vacant or underutilised site (non-residential)	Demolition and redevelopment of existing residential buildings	Infill development – within curtilage of existing dwelling	Residential conversions or extensions (including sub-division)	Redevelopment of non-residential buildings (including Change of Use and upward extensions of flats)
1 net additional unit	☐	☐	☐	☐	☐
2-3 additional units	☐	☐	☐	☐	☐
4-5 additional units	☐	☐	☐	☐	☐
6-10 additional units	☐	☐	☐	☐	☐
11-25 additional units	☐	☐	☐	☐	☐
26+ additional units	☐	☐	☐	☐	☐

The following questions are specifically in relation of sites up to 0.25ha / 0.6 acres:

Q10: Which of the following do you regard as an important indicator of development prospects for each broad type of scheme (tick all that apply).

Check all that apply.

	Infill development of vacant or underutilised site (non-residential)	Demolition and redevelopment of existing residential buildings	Infill development – within curtilage of existing dwelling	Residential conversions or extensions (including sub-division)	Redevelopment of non-residential buildings (including Change of Use and upward extensions of flats)
Proximity to nearby Town / District or Neighbourhood Centre(s)	☐	☐	☐	☐	☐
Quality of nearby amenities	☐	☐	☐	☐	☐
Availability of Public Transport	☐	☐	☐	☐	☐
Condition of Existing Property	☐	☐	☐	☐	☐
Site Value based on Existing Use	☐	☐	☐	☐	☐
Availability of Permitted Development Rights	☐	☐	☐	☐	☐
Ability to acquire site with existing permission	☐	☐	☐	☐	☐
Scope to Retain or Provide Mixed Uses	☐	☐	☐	☐	☐
Likelihood of obtaining permission	☐	☐	☐	☐	☐
Scope for Extensions to increase Plot Coverage	☐	☐	☐	☐	☐
Scope to Add Basement or Upward Extension	☐	☐	☐	☐	☐
Size of Plot	☐	☐	☐	☐	☐
Provision for car parking	☐	☐	☐	☐	☐
Scope for new Backland / Infill / Garden Land Development	☐	☐	☐	☐	☐
Surrounding context promotes development or reflects limited constraints	☐	☐	☐	☐	☐

Q10: Other: Please provide any other examples that indicate prospects for development:

Q11: Which of the following do you regard as the most common barriers to development prospects for each broad type of scheme (tick all that apply)

Check all that apply.

	Infill development of vacant or underutilised site (non-residential)	Demolition and redevelopment of existing residential buildings	Infill development – within curtilage of existing dwelling	Residential conversions or extensions (including sub-division)	Redevelopment of non-residential buildings (including Change of Use and upward extensions of flats)
Availability of sites for development type	☐	☐	☐	☐	☐
Cost of Site (Land Value)	☐	☐	☐	☐	☐
Availability of Finance	☐	☐	☐	☐	☐
Abnormal Development Costs	☐	☐	☐	☐	☐
Unable to achieve sufficient number of net additional units	☐	☐	☐	☐	☐
Requirement to re-apply for or revise existing planning permission	☐	☐	☐	☐	☐
Impact of Planning Obligations including Affordable Housing	☐	☐	☐	☐	☐
Impact of Community Infrastructure Levy	☐	☐	☐	☐	☐
Existing planning policies – difficulty establishing principle of development	☐	☐	☐	☐	☐
Existing planning policies – design or development standards	☐	☐	☐	☐	☐
Speed of planning process	☐	☐	☐	☐	☐
Other development standards and regulations	☐	☐	☐	☐	☐

Q11: Other: Please provide any other examples that indicate barriers to development:

Q12: Please indicate your typical timescales for each of the following stages:
Check all that apply.

	Site Identification and Acquisition	Preparation of Proposed Scheme	Obtaining Planning Permission	From first permission to commencement of the first dwelling	Build-out Period to Completion
0-3 months	☐	☐	☐	☐	☐
3-6 months	☐	☐	☐	☐	☐
6-9 months	☐	☐	☐	☐	☐
9-12 months	☐	☐	☐	☐	☐
12-18 months	☐	☐	☐	☐	☐
18-24 months	☐	☐	☐	☐	☐
2+ years	☐	☐	☐	☐	☐

Q13: Please provide any other comments on your experience with the development of small sites:

Thank you for your assistance with this project. If you have any further questions, please contact Jon Goodall at Troy Planning + Design via info@troyplanning.com

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