

# GREATER LONDON AUTHORITY

## REQUEST FOR ASSISTANT DIRECTOR DECISION – ADD2784

### London-wide Small Site Design Code

#### Executive summary:

This Assistant Director Decision seeks approval of expenditure to cover the costs of producing a potential London-wide Small Site Design Code. The aim of such a design code would be to provide clarity to applicants and developers (particularly small builders; and small and medium-sized enterprises) on the development of small sites across London in order to help support the delivery of housing in London and diversify supply.

This project was referenced in the 'Towards a New London Plan' consultation document. This outlined that the new London Plan could include a London-wide small site design code, which would set out specific development types that are acceptable (in principle) for areas sharing similar building types and other characteristics. This project also directly supports the Making Best Use of Land mandate and Delivery Plan.

#### Decision:

That the Assistant Director of Planning and Regeneration approves spending up to £55,000, from the 2025-26 London Plan Programme budget, to commission a specialist consultancy to help consider and develop a potential London-wide Small Site Design Code.

#### AUTHORISING ASSISTANT DIRECTOR/HEAD OF UNIT

I have reviewed the request and am satisfied it is correct and consistent with the Mayor's plans and priorities.

It has my approval.

**Name:** Lucinda Turner

**Position:** Assistant Director for  
Planning and Regeneration

**Signature:**



**Date:**

22/09/2025

## PART I – NON-CONFIDENTIAL FACTS AND ADVICE

### Decision required – supporting report

#### 1. Introduction and background

- 1.1. This project involves the development of a potential London-wide Small Site Design Code; this would provide greater clarity on acceptable design responses for a range of site contexts across London. A suitably qualified consultant will be procured to advise and lead on the development of a potential design code. Subject to this work, such a design code could be published within or alongside the next London Plan.
- 1.2. The next London Plan will have an annual housing need of 88,000 homes a year. Given the scale of this target which has been set by central Government, GLA officers are exploring a range of housing delivery models and types of sites – including the role of small sites (small sites are defined within the London Plan (2021) as being below 0.25 ha). This is a key workstream within the Making Best Use of Land Delivery Plan.
- 1.3. The Mayor of London consulted on a [Towards a New London Plan](#) (TNLP) document between 9 May and 22 June 2025. This set out a direction of travel and a range of different options being considered for the preparation of the next London Plan (the spatial development strategy for London, used to guide and shape London’s development in the years ahead). It included an option to develop a London-wide Small Site Design Code which would aim to support small house builders and small and medium-sized enterprises (SMEs) in developing more small sites across London.
- 1.4. A London-wide Small Site Design Code would predominantly focus on the redevelopment of sites in London’s residential areas. This includes areas of inner London and also suburban London – with the need to support good quality densification of these areas if we are to deliver an increase in housing in London. A London-wide Small Site Design Code would be developed using a similar methodology to that set out in the [Small Site Design Code London Plan Guidance \(LPG\)](#) and could define specific design codes for different types of areas of London.

#### 2. Objectives and expected outcomes

- 2.1. This work should be split into four phases, each comprising one or more stages. These are as follows:

| Phase name                                                                                                          | Outputs                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
|---------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Phase one</b><br>Technical analysis of the types of sites that a London-wide Small Site Design Code could cover. | 1. Identify and produce a list of potential ‘site contexts and/or typologies’ that a London-wide Small Site Design Code could include. For each site context a set of parameters / thresholds should be defined, to identify the feasibility of such contexts. This should lead to a set of detailed recommendations.                                                                                                                                                                            |
|                                                                                                                     | 2. The GLA will agree a list of site contexts to be taken forward in the work. This should be supported by a high-level analysis to estimate the number of sites for each site context across London including mapping which applies the categorisation to the whole of Greater London. This analysis should support the identification of an amount (area) of each context, and count of each site type.<br>This stage will include agreement on design parameters for different site contexts. |
|                                                                                                                     | 3. Provide advice/recommendations on the optimal process and functioning of a London-wide small site design code. This should include recommendations on which type of site context is more                                                                                                                                                                                                                                                                                                      |

|                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                                                                              | suitable to greater/lesser levels of prescription (such as a more prescriptive 'pattern book' approach which could apply to sites which meet a set of criteria versus a less prescriptive high-level design code).                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>Phase two</b><br>Targeted engagement with architects and SMEs                                                                                             | 4. Carry out targeted engagement with a small group of London boroughs, architects and SMEs, to discuss and develop a series of possible/desirable site responses/designs for each site context identified in Output 1. This should involve workshops with key stakeholders to discuss the possible responses to each site context. It's expected that a range of site responses/designs will be discussed which will vary depending on the site context. This optioneering should consider the potential equality impacts of each of the design responses and/or potential future codes. Where appropriate, mitigations should be identified and put in place. |
| <b>Phase three</b><br>Technical analysis into the approximate capacity for each type of site context, including viability and deliverability considerations. | 5. An analysis should be carried out on the design responses that are selected for each site context. This should be integrated with a viability and deliverability analysis so that this is considered as part of the optioneering around different design responses. The consultant should provide an estimate of current costs for a set of design responses under consideration. This should be accompanied by an approximate capacity for each type of site context – providing a set of high-level design response/assumption for what could be developed on each of the site contexts.                                                                   |
| <b>Phase four</b><br>Development of a London-wide Small Site Design Code                                                                                     | 6. Produce a potential London-wide Small Site Design Code. It will have a short introduction explaining how the design code works; and giving a list of site contexts (which could (if preferred) be identified using the London-wide characterisation mapping – developed separately). The rest of the document should focus on the potential individual design codes for each character type and site context.                                                                                                                                                                                                                                                |
|                                                                                                                                                              | 7. Each potential design code for the relevant character type and site context should include a typical site plan; illustrations; and photos of the typical site context.<br>The design code for each site context is expected to be concise, using images to illustrate key design parameters (no more than a couple pages for each).                                                                                                                                                                                                                                                                                                                          |
|                                                                                                                                                              | 8. Carry out a short engagement exercise with stakeholders, to identify any changes that should be made to the emerging work.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
|                                                                                                                                                              | 9. The different components should be combined into one document.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| <b>Phase five</b><br>Post London Plan consultation amendments                                                                                                | 10. The work will need to be completed sufficiently ahead of the public consultation on the next London Plan (scheduled for spring 2026). This consultation could include a London-wide Small Site Design Code alongside (or within) the next London Plan. If so, following public consultation, the consultants would be asked to amend the document, to reflect an agreed position (which would be subject to the consultation).                                                                                                                                                                                                                              |
|                                                                                                                                                              | 11. Subject to this, a proposed London-wide Small Site Design Code should be prepared and submitted electronically to the GLA. This should be mainly made up of graphics; it should not contain a significant amount of text or be overly long.                                                                                                                                                                                                                                                                                                                                                                                                                 |
| <b>Phase six</b>                                                                                                                                             | 12. The GLA's web and GIS teams would collaborate on a web version of any London-wide Small Site Design Code. This should allow users                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

|                                                       |                                                                                                              |
|-------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|
| Web version of the London-wide Small Site Design Code | to zoom into an interactive map on London.gov.uk and understand the design code as it applies to their site. |
|-------------------------------------------------------|--------------------------------------------------------------------------------------------------------------|

### 3. Equality comments

- 3.1. The public sector equality duty, under section 149 of the Equality Act 2010 (the Act), requires the identification and evaluation of the likely potential impacts, both positive and negative, of decisions on those with protected characteristics. The Mayor is to have due regard to the need to: eliminate unlawful discrimination, harassment and victimisation; and advance equality of opportunity, and foster good relations, between people who share a protected characteristic and those who do not. In particular, this may involve removing or minimising any disadvantage suffered by those who share a relevant protected characteristic; and taking steps to meet the needs of such people. In certain circumstances, compliance with the Act may involve treating people with a protected characteristic more favourably than those without one.
- 3.2. To assess the possible impacts of this project on those with protected characteristics, a scoping Equality Impact Assessment has been carried out. Its findings are shown in the table below:

| Impacted group        | Potential impact                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | Mitigation (where necessary) |
|-----------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------|
| Religion or belief    | While a London-wide Small Site Design Code would predominantly aim to encourage and shape new dwellings, it could also provide clarity on residential extensions to existing homes. This could positively impact those who live in multi-generational households and wish to extend their home to accommodate for this.                                                                                                                                                                                                                 | N/A                          |
| Disability            | Small sites are less likely to meet the threshold for the provision of accessible housing. This would have an impact on Londoners with a physical disability.<br><br>Notwithstanding, there may be certain site contexts such as larger-surface car parks and garage sites which would meet threshold for the provision of accessible homes. Any increase in the number of these homes would provide more homes that would be suitable for Londoners with a physical disability.                                                        | N/A                          |
| People on low incomes | It is likely that the number of housing units provided on sites through the Small Site Design Code would be too small to meet the threshold for providing affordable housing.<br><br>However, there may be certain site contexts – such as larger-surface car parks and garage sites – that would meet the affordable threshold. These sites should therefore provide a proportion of homes that are affordable. In addition, any increase in the delivery of housing overall, would help contribute to tackling housing affordability. | N/A                          |

- 3.3. This assessment has concluded that the project is unlikely to have a significant impact on any persons with protected characteristics. The London Plan will be subject to an EqIA which will consider the impacts of the policies within it.

### 4. Other considerations

### Key risks and issues

- 4.1. The redevelopment of small sites can be divisive, and there are risks with potential options that could be explored which would be contentious with local residents e.g. the redevelopment of dwellings into flatted development. This was highlighted in 2022, when Croydon's Suburban Design Guide (SPD) was revoked due to opposition to the SPD.
- 4.2. In communication with officers at Croydon, several other issues and challenges have been highlighted. These include the risk that if a design code is too flexible, it can be difficult to resist applications for poorly designed schemes / schemes that could have adverse impacts. This is reported to have happened in Croydon, where some schemes (such as those with lots of surface car parking) were refused by officers at the council only to be approved at appeal.
- 4.3. Another risk that will need further consideration is how a London-wide Small Site Design Code could be implemented at the borough level. This is an important consideration, given that almost all small site planning applications will be decided by the borough, rather than the GLA, as these applications will not meet the threshold set out within the Town and Country Planning (Mayor of London Order) 2008 to be referable to the Mayor. Therefore, the Mayor of London would not have control or oversight over the assessment of these applications.

### Links to other Mayoral strategies and priorities

- 4.4. This project primarily supports the Mayor's mandates of building more homes and making best use of land. In addition, this project would also contribute to the boosting London's growth sectors mandate if it made it easier for more small builders and SMEs to redevelop sites. The project could also support improvements to London's housing stock through the use of planning conditions on extensions to existing dwellings.

## **5. Financial comments**

- 5.1. Approval is sought to spend up to £55,000 to procure and appoint specialist consultancy services to develop a potential London-wide Small Site Design Code. The decision also requests approval to commence procurement for this project via the Architecture & Urbanism Framework Lot 7 (Small Sites); and award the subsequent contracts via a direct award.
- 5.2. The total funding for this project (up to £55,000) will be met from the London Plan 2025-26 budget. There is sufficient budget to cover this expenditure; all expenditure will take place in the 2025-26 financial year.
- 5.3. All appropriate budget adjustments will be made.

## **6. Legal comments**

- 6.1. The sections above indicate that the decision requested of the Mayor fall within his statutory power under section 30 of the Greater London Authority 1999 (as amended) ("the Act"), acting on behalf of the Authority, to do anything he considers will promote the improvement of the environment in Greater London; and in formulating the proposals in respect of which a decision is sought officers have complied with the Authority's related statutory duties to:
  - (a) pay due regard to the principle that there should be equality of opportunity for all people;
  - (b) consider how the proposals will affect:
    - i. the health of persons in Greater London,

- ii. the health inequalities between persons living in Greater London;
- iii. the achievement of sustainable development in the United Kingdom; and
- iv. climate change, and the consequences of climate change; and

(c) consult with appropriate bodies.

6.2 Section 334 of the Act requires the Mayor to prepare and publish a Spatial Development Strategy (known as the London Plan). Section 339 of the Act requires the Mayor to keep the London Plan under review, especially matters which may be expected to affect the development of Greater London or the planning of its development.

6.3 The Authority also has a subsidiary power pursuant to Section 34 of the Act. This gives the Mayor the authority to do anything which is calculated to facilitate or, is conducive or incidental to the exercise of any of the statutory functions of the Authority. In this case, the decision to procure a specialist consultant technical services to under this work may reasonably be regarded as facilitating, being conducive or incidental to, the exercise of the Mayor's power detailed above.

#### *Procurement*

6.4 Officers must ensure that appropriate documentation is put in place and executed by the consultant and the GLA formalising the services before commencement of such services.

## **7. Planned delivery approach and next steps**

7.1. The project will be delivered according to the following timetable

| <b>Activity</b>                                                       | <b>Timeline</b>         |
|-----------------------------------------------------------------------|-------------------------|
| Procurement of contract                                               | September 2025          |
| Announcement                                                          | Late September 2025     |
| Delivery start date                                                   | Late September 2025     |
| Main milestones – targeted engagement with architects and SMEs        | October/November 2025   |
| Main milestones – development of a London-wide Small Site Design Code | November – January 2026 |
| Main milestones – amendments following the London Plan consultation   | August – October 2026   |
| Delivery end date                                                     | January 2027            |
| Project closure                                                       | January 2027            |

## **Appendices and supporting papers:**

Appendix A: Procurement brief

### Public access to information

Information in this form (Part 1) is subject to the Freedom of Information Act 2000 (FoIA) and will be made available on the GLA website within one working day of approval.

If immediate publication risks compromising the implementation of the decision (for example, to complete a procurement process), it can be deferred until a specific date. Deferral periods should be kept to the shortest length strictly necessary. **Note:** This form (Part 1) will be published either within one working day after it has been approved or on the defer date.

### Part 1 – Deferral

#### Is the publication of Part 1 of this approval to be deferred? YES

If YES, for what reason:

This project will be linked to the next London Plan and the policies within it. Therefore, any details on the decision should only be made public once the next London Plan public consultation has ended to avoid prejudicing statutory consultation on the new London Plan.

Until what date: July 2026.

### Part 2 – Sensitive information

Only the facts or advice that would be exempt from disclosure under the FoIA should be included in the separate Part 2 form, together with the legal rationale for non-publication.

#### Is there a part 2 form? NO

### ORIGINATING OFFICER DECLARATION:

Drafting officer to confirm the following (✓)

#### Drafting officer:

Alan Smithies has drafted this report in accordance with GLA procedures and confirms the following:

✓

#### Mayoral Delivery Board

A summary of this decision was reviewed by the Mayoral Delivery Board on 11 September 2025.

✓

### ASSISTANT DIRECTOR, FINANCIAL SERVICES:

I confirm that financial and legal implications have been appropriately considered in the preparation of this report.

#### Signature



#### Date:

22/09/2025