GREATER**LONDON**AUTHORITY

[redacted]
(by email)

Our reference: MGLA141026-9806

9 November 2026

Dear [redacted]

Thank you for your request for information which the Greater London Authority (GLA) received on 14 October 2026. Your request has been considered under the Environmental Information Regulations (EIR) 2004.

You requested:

> I am requesting information under the Environmental Information Regulations 2004 concerning the RCKa small-sites assessment used in the 2026 London SHLAA.
>
> In correspondence dated 14 October 2026 (copied below), the GLA confirmed that:
>
> RCKa's classification approach had been validated through work funded by the PropTech Innovation Challenge.
>
> RCKa had produced various additional outputs at key stages of the small-sites assessment.
>
> RCKa retains the underlying site or parcel-level outputs, which are not held directly by the GLA.
>
> Please provide the following information:
>
> 1. Validation evidence
>
> Copies of any validation reports, testing results or other recorded findings concerning RCKa's small-sites identification and classification methodology, including those arising from the PropTech Innovation Challenge.
>
> This should include any recorded findings concerning classification accuracy, estimated housing capacity and the reliability of the methodology used in the 2026 SHLAA.
>
> 2. Additional RCKa documents and outputs
>
> Any existing list, schedule or index identifying the technical reports, methodology notes, validation documents and other supporting outputs produced by RCKa during the preparation of the 2026 SHLAA, beyond those already published.

I am initially seeking identification of these documents and outputs, rather than copies of all of them.

3. Evidence relating to Enfield

Copies of any recorded validation findings or assessments specifically examining the reliability of Enfield's estimated small-sites housing capacity of 5,155 homes, including any testing of the assumed development rates against historic delivery.

4. Information held by RCKa

Where relevant information is retained by RCKa rather than the GLA, please consider whether it is held on behalf of the GLA for the purposes of Regulation 3(2)(b) of the Environmental Information Regulations.

If any requested information is not held for the purposes of the Regulations, please confirm this explicitly for the relevant category**.**

Our response to your request is as follows:

1. Please find attached reports that we hold within the scope of your request.

2. We do not hold this information.

3. The approach is set out in the SHLAA report and published appendix II - https://data.london.gov.uk/download/20gq8/m5v/2026%20London%20SHLAA%20-%20Appendix%20II%20-%20Delivery%20rate%20graphs.pdf. This considered each LPA's delivery rate set by type and SAM band, in reference to achieved historic rates.

4. Not held on GLA's behalf.

If you have any further questions relating to this matter, please contact me, quoting the reference MGLA141026-9806.

Yours sincerely

[redacted]
Information Governance Officer

If you are unhappy with the way the GLA has handled your request, you may complain using the GLA's FOI complaints and internal review procedure, available at: https://www.london.gov.uk/about-us/governance-and-spending/sharing-our-information/freedom-information

PropTech Geovation

Progress Report

October 2025

2519-RCK-XX-XX-RP-A-00001

Revision Number P01

RCKa



Contents

Revision Number	Status Code	Date Issued
P00	S0: Draft	18/11/2025
P01	S3: For Review	18/11/2025

Part 1: Literature Review

- Policy Context
- Small Sites Design Codes LPG
- Small Sites SPDs
- Implications

Part 2: Site Types

- Universal Site Classification
- Site Types
- Potential Types
- Implications

Part 3: Early Capacity Projection

- Projection Methodology
- Extrapolated Capacity
- Implications

Part 4: Advice and Recommendations

- Design Code Draft Scope
- Schedule of Considerations
- Next Steps

Executive Summary

This report constitutes fulfilment of the Phase 1 criteria for development of the Small Sites Design Code (SSDC).

We have reviewed the existing policy layers and local level guidance, developed a comprehensive site typing methodology, and through mapping and statistical projection, have determined an early small sites capacity of 545,000 dwellings across London. We'll be refining our speculative methodology throughout the project to ensure our evidence base is as robust as possible.

At the end of this document, we've prepared a schedule of considerations to facilitate ongoing discussion of the SSDC's potential scope, form, and ambition.

Phase Progress
The project is structured around the Phase 1 deliverables, establishing a contextual background for the scoping of the plan.

- **Phase 1 Contextual Analysis**
- **Phase 2 Stakeholder Engagement**
- **Phase 3 Technical Analysis**
- **Phase 4 Design Code**
- **Phase 5 Consultation Amendments**
- **Phase 6 Online Version**

Next Steps

Our work on Phase 2 is still active, working to identify key stakeholders and a programme of consultation to help review the emerging design code.

This document will be updated and expanded throughout the delivery of the programme to demonstrate ongoing progress against the agreed deliverables.



Literature Review

Policy Context

Existing Framework

This section establishes the statutory purpose, remit, and authority of a Regional Design Code, setting out the policy drivers that create the mandate for clear, prescriptive design guidance for small sites across London.

1. Statutory Basis and Scope of Influence

A Regional Design Code has a clearly defined scope shaped by national and regional policy:

1.1 Definition of Small Sites: London Plan policy sets an unambiguous threshold: small sites are defined as ≤0.25 hectares. While the design code centres on this threshold, its principles may also extend to sites marginally above this size where shared design conditions exist.

1.2 Status as Regional Guidance: The Small Sites Design Code (SSDC), as regional guidance, supports and clarifies the implementation of both the London Plan and borough-level Local Plans. It does not introduce new planning policy; rather, it provides a clearly set out means of interpretation to encourage consistent application across London.

1.3 Material Weight in Decision-Making: Under the National Planning Policy Framework (NPPF), Supplementary Planning Documents and design codes are material considerations. Their purpose is to provide clarity and certainty on design expectations—particularly for smaller-scale developments that benefit most from predictable and replicable rules.

2. Policy Mandate for Small Sites Delivery
A strong policy imperative underpins the development of the new SSDC:

2.1 National Requirement: The NPPF requires local authorities to identify sites capable of delivering at least 10% of their housing requirement on small and medium-sized sites. These sites are nationally recognised as essential to boosting delivery due to their quicker build-out rates.

2.2 Regional Priority in London: The 2021 London Plan elevates small sites to a strategic priority, assigning specific borough-level targets. For example, Lewisham's target of 3,790 small-site homes over ten years equates to nearly a quarter of its overall capacity requirement, underscoring the systemic reliance on small sites in achieving London-wide housing goals.

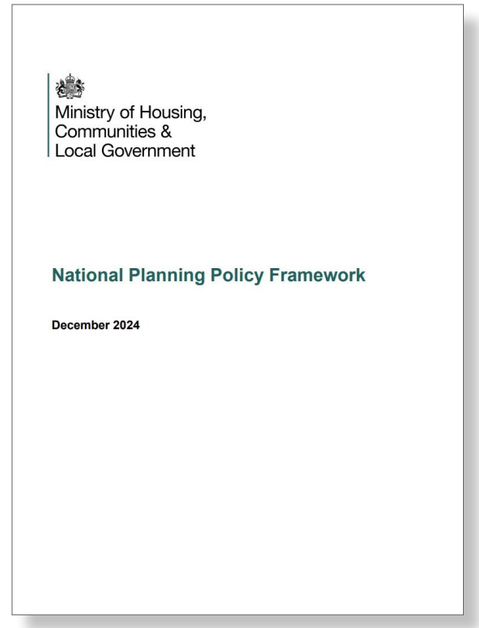
3. Risk Reduction, Quality Assurance, and Deliverability

The emerging SSDC must respond directly to recurring barriers to delivery:

3.1 Reducing Planning Risk: Clear regional coding reduces uncertainty for applicants, accelerates decisions, and increases the proportion of schemes that gain approval at first submission.

3.2 **Ensuring Design Quality:** The code must maintain high standards of architectural quality, contextual appropriateness, heritage sensitivity, amenity, and environmental performance, ensuring that accelerated delivery does not compromise long-term urban quality.

3.3 Supporting Affordable Housing & Wider Participation: By improving certainty and reducing costs associated with iterative design, the SSDC can help ensure that more small sites come forward, expanding participation beyond major developers to include SMEs, custom builders, and community-led approaches.


Ministry of Housing, Communities & Local Government

National Planning Policy Framework

December 2024

Small Sites Design Codes LPG

Current Baseline Guidance

This section evaluates the existing Small Sites Design Code LPG as the baseline template for area-wide design coding, identifying where methodology is sound, where gaps remain, and where greater prescription or refinement could be introduced.

1. Purpose and Influence of the Current LPG

The LPG is the principal regional tool used to translate the strategic mandate of the London Plan (Policy H2) into actionable policy for local authorities.

1.1 Document Purpose: The LPG is directed at planning authorities for the plan-making stage, but also instructs developers and design teams to refer to it. Once a design code is adopted locally, the LPG mandates its use by boroughs and other decision-makers as a basis for determination.

2. Design Code Guidance

The current LPG establishes a strong foundational methodology for design coding:

2.1 Exclusive Focus on Area-Wide Codes: The guidance is tailored to contexts where incremental intensification and replicable design conditions apply—e.g., consistent suburban street types, conservation-led neighbourhoods, or morphologically coherent blocks.

2.2 Rules-Based Format: Codes must be simple, concise, numerical, and visual wherever possible. This aligns with national design-code methodologies and provides a framework for predictability.

2.3 Mandatory Language Hierarchy: The use of must / should / could is advised to create clarity on the degree of compliance expected and is critical for consistent decision-making.

2.4 Character-Led Approach: Codes must derive from a clear set of Design Visions and Principles tied to distinct character types, with a Coding Plan mapping where each code applies.

3. Emerging Context

3.1 Evidence Base - As part of our scope in preparing the SSDC, we are also mapping out small site capacity using a proprietary AI tool combined with statistical projection. It's expected that these findings may be used to form part of an evidence base that backs up the policy mandate of the SSDC.

3.2 London Plan Draft - Our work on the design code will occur in parallel with the preparation of the new London Plan draft, and as such will need to align with a shifting policy context.

4. Opportunities for Expansion

While the baseline is sound, there are clear opportunities for the new SSDC:

4.1 Optimisation and Capacity Testing: Current guidance requires boroughs to test codes through workshops to identify unintended consequences - notably the failure to optimise capacity. This reveals a gap in the existing approach to balancing character sensitivity with London's intensification requirements.

4.2 Clearer and More Consistent Parameters: Baseline parameters (frontage building line, massing relative to neighbours, height controls) remain unevenly interpreted across boroughs. The SSDC should establish a London-wide policy focus with room for local refinement - but not contradiction.

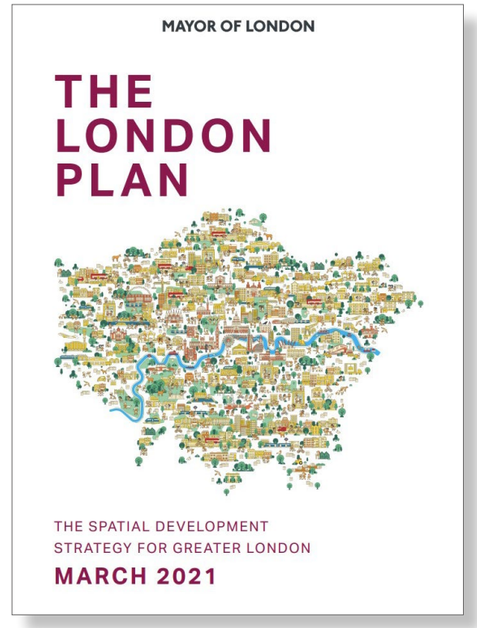
4.3 Site Types: The current LPG includes guidance on four site types.

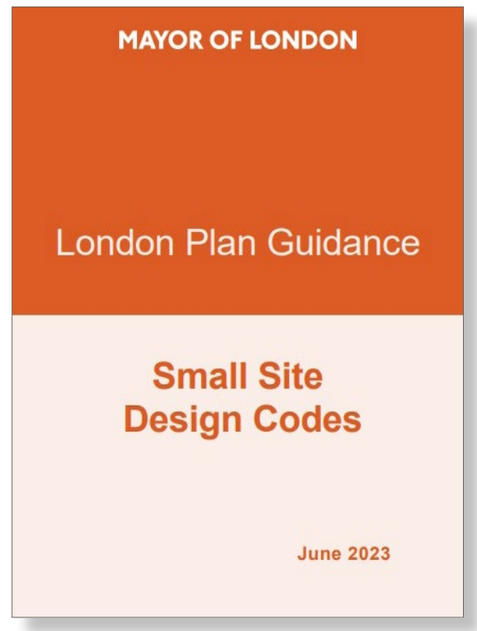
- Street-facing context
- Backland context
- High street context
- Residential extension context

Through our work developing the Small Sites AI tool, we have developed a significantly more comprehensive taxonomy of site types, which will allow for more explicit and specific design guidance.

4.4 Improved Site Identification Methods: The LPG encourages listing small sites on Brownfield Registers. The SSDC can reinforce this by promoting more consistent use of tools such as the GLA Small Sites Small Builders map, or by introducing a regional dataset structure.

Overall, the new SSDC must transition from qualitative guidance to codified, consistent requirements that directly address the complexities of small-site development across diverse borough contexts.





Small Sites SPDs

Existing Local Small Site Guidance

This section synthesises learning from borough SPDs and local strategies, showing how regional guidance is interpreted in practice and identifying principles that the new SSDC should adopt or regulate.

1. Strategic Local Focus

The challenge of delivering housing on small sites is addressed by local guidance documents in distinct ways, reflecting each borough's unique urban character, density pressures, and historic reliance on incremental development.

While all local Supplementary Planning Documents (SPDs) must adhere to the National Planning Policy Framework (NPPF) and the London Plan mandates for intensification, they diverge significantly in their specific strategic focus, site typology, and the level of prescriptive detail provided to mitigate local constraints.

Merton Small Sites Toolkit SPD: Merton has the highest reliance on small sites in the provided data: over 60% of all new homes delivered in the last 15 years were built on small sites, accounting for 97% of all approved applications.

The focus is managing an already dominant mode of delivery. The challenge is maintaining quality and high standards while accommodating necessary growth.

Lewisham Small Sites Design Guide SPD: Lewisham's small sites target of 3,790 net homes over ten years makes up roughly 23% of its overall London Plan target.

The strategic aim is to diversify housing supply away from reliance on large strategic sites and to stimulate the local economy by supporting local builders. Lewisham also uses small sites delivery to safeguard its income from the New Homes Bonus and improve infrastructure through Community Infrastructure Levy (CIL) contributions.

Croydon Suburban Design Guide: Croydon anticipates that approximately one third of its 32,890 new homes will be delivered through small scale suburban (windfall) developments.

This design guide, now revoked, explicitly acknowledged that delivering the anticipated 10,000 suburban homes will result in an evolution of existing character.

Implementation of this design guide was controversial. Though contributing to a considerable acceleration of small site delivery in Croydon, the design guide was politically untenable in the long-run, likely due to the concentration of its impact and focus on intensification practices.

Tower Hamlets Central Area Good Growth SPD: The focus is primarily on managing "Good Growth" through a contextual approach, necessary due to the dense urban character of the central area.

The SPD focuses on ensuring development on small sites in the 'Central Area' is sympathetic to the complex surrounding context, and respects local character while delivering growth.

2. Common Challenges

Local authorities highlight consistent challenges across small-site types:

2.1 Defined typologies: Categories such as Infill, Backland, Garden Land, Amenity Sites, and Conversions/Extensions appear across multiple boroughs, presenting a clear typological structure for the SSDC to address.

2.2 Garden protection: Most boroughs strongly resist development on green or garden land. The SSDC must reconcile regional intensification objectives with local environmental and character concerns by clarifying where development is permissible and under what conditions.

2.3 Backland access and safety: Issues around waste access, emergency service access, pedestrian/cycle safety, and legibility recur across borough SPDs. Regional guidance must set minimum access standards, particularly for sites without street frontage.

2.4 Managing over-development: A key barrier to successful applications is perceived over development. Local SPDs routinely stress proportionality, neighbour amenity, and context. The SSDC can introduce clearer benchmarks to prevent iterative refusals and clarify what "appropriate scale" means in a London-wide context.

3. Design Code Scope

Local SPDs also demonstrate ambition that the SSDC could choose to reflect at the regional expectation:

3.1 Design-led solutions: Local authorities emphasise avoiding superficial pastiche while ensuring coherent responses to street proportion, building line, roof form, materials, and corner-site prominence. The SSDC can establish a consistent regional baseline for contemporary interpretation of character.

3.2 Sustainability and climate resilience: Boroughs are increasingly setting ambitious requirements- e.g., HQM certification or BREEAM Excellent. The SSDC could amplify this ambition - however, this will need to be implemented with sensitivity to it's effect on small site constraints and viability.

3.3 Deliverability: Some Local SPDs have underscored the role small sites might play in encouraging development from Community Land Trusts, or by SME developers.

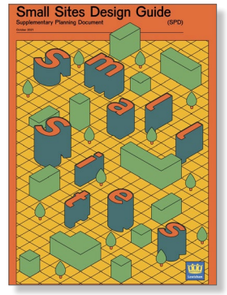
The SSDC could support participation by:

3.3.1 Simplifying requirements where appropriate;

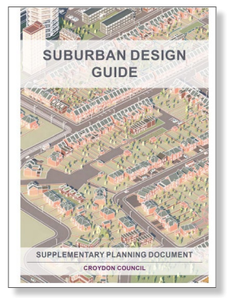
3.3.2 Clarifying affordability contributions;

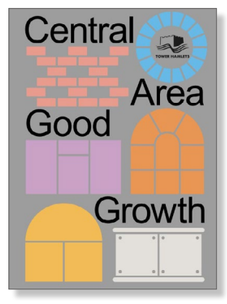
3.3.3 And improving predictability for applicants with limited resources.

Local small sites guidance documents vary considerably in scope and focus. If one of the new SSDC's priorities is the encouragement of local-level guidance, clear identification of a regionally consistent policy focus would be advisable.









Key Implications

SSDC Recommendations

Existing policy creates a clear mandate for small sites delivery but current guidance fails to provide the consistency and prescription needed to unlock capacity at scale.

The London Plan sets strategic targets and the LPG establishes sound methodological principles, but borough SPDs vary significantly in their approach, from qualitative contextual guidance to metric-based rules, resulting in inconsistent interpretation of core parameters like height, separation distances, and amenity standards.

Two critical gaps must be addressed by the SSDC:

1. First, no existing site classification is comprehensive enough to offer clear and unambiguous guidance for small site development that can be applied universally across London.
2. Second, contentious issues like intensification lack clear regional standards, leading to inconsistent local policies and regression away from London Plan principles.

The SSDC must therefore transition from qualitative principles to codified, site-type-specific requirements that establish a London-wide baseline and policy focus, which may then be refined at the local level.

This approach should improve confidence at the planning stage for both applicants and planners, reduce uncertainty, and accelerate decision-making to unlock greater housing delivery and capacity to meet the needs of London's diverse communities.

Site Types

Universal Site Classification

Classification Methodology

Universal Site Types

A London-wide design code needs a clear and comprehensive framework for classifying site types. A universal typology allows the code to identify housing capacity across all sites, guide policy consistently, set standardised design rules, and cover nearly every potential development scenario.

Policy Grouping

To structure the design-code approach and define how different sites contribute to housing delivery, we group small sites into three overarching categories. These capture not only their capacity potential, but also their impact on existing built fabric or residential capacity.

Infill - refers to development on residual or previously unused space within an existing plot, block, or street frontage, where new homes can be delivered without the loss of existing built fabric.

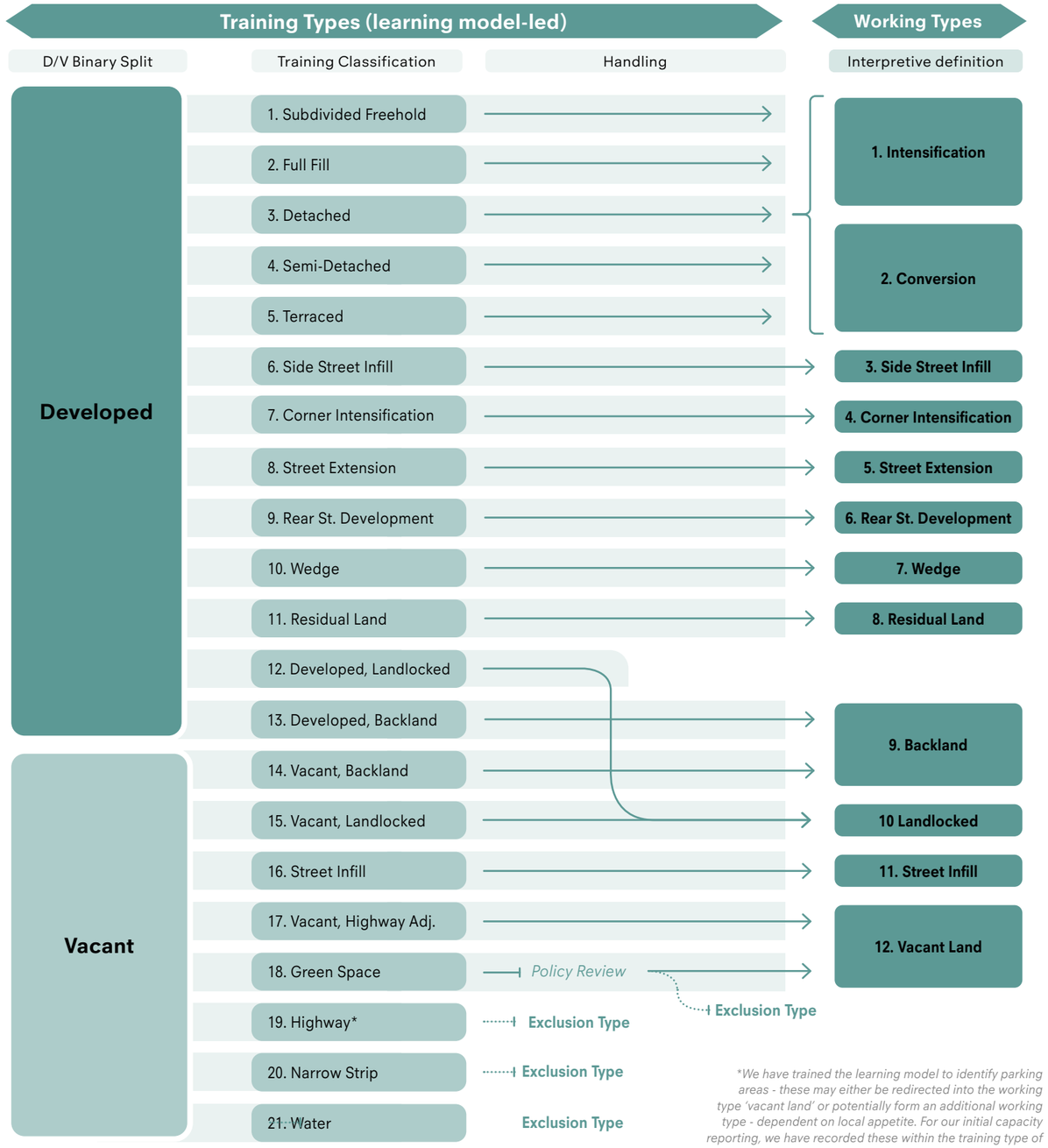
- Typically the least disruptive form of development.
- Adds capacity by occupying gaps or side spaces.
- Works well where street form is already coherent and can be complemented.

Intensification - refers to increasing the density, built form, or housing yield of a site that already contains development.

- May involve partial or full replacement of existing structures.
- Must result in a net increase in capacity.
- Often more sensitive as this style of development can changes the established built form.

Reconfiguration - refers to modifying, extending, or subdividing an existing building to increase capacity without wholesale redevelopment of the site.

- Achieves incremental uplift through adaptation rather than replacement.
- Often used in sensitive contexts where external changes are constrained.
- Can improve utilisation of existing building stock at relatively low impact.



Site Types

Definition and Working Examples

1. Intensification

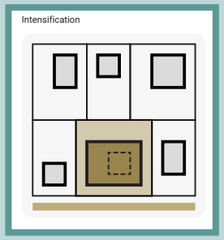
Definition: The replacement of an existing residential building with a larger development resulting in a net increase in the number of dwellings on the sites.

Working Example:

Foxley Lane, 08 Architecture

Training Types:

Subdivided freehold, full fill, terraced, semi-detached, detached.





Capacity Implication: Intensification

2. Conversion

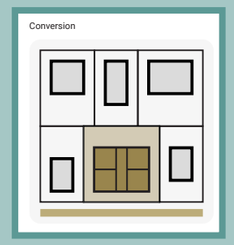
Definition: The change of use (and potentially the extension) of an existing building into new homes, where there is a net gain of at least one dwelling.

Working Example:

The Gin Distillery, Open Practice Architecture

Training Types:

Subdivided freehold, full fill, terraced, semi-detached, detached.





Capacity Implication: Reconfiguration

3. Side Street Infill

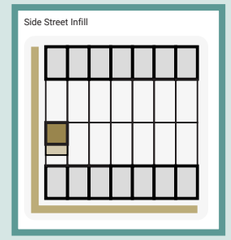
Definition: Development to the rear of an existing dwelling house where the garden has direct access to the public highway.

Working Example:

Angle House, Carbogno Architects

Training Types:

Side street infill.





Capacity Implication: Infill

4. Corner Intensification

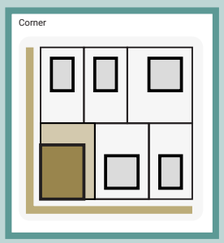
Definition: The development of an existing plot, perhaps where a single dwelling already exists, at the intersection of two roads, which results in a net gain the number of dwelling on the site.

Working Example:

Purley Downs Road, Harp & Harp

Training Types:

Corner Intensification.





Capacity Implication: Intensification

5. Street Extension

Definition: Usually where a new dwelling is added to the end of an existing row of terraces.

Working Example:

Lucien Road, Harp & Harp Architects

Training Types:

Street Extension.





Capacity Implication: Infill

6. Rear Street Development

Definition:

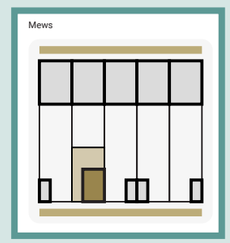
Where an existing dwelling has a deep garden, the end of which has direct access to the public highway, allowing new dwellings to be built facing onto the street.

Working Example:

Morpeth Road, Mowat & Company

Training Types:

Rear Street Development.





Capacity Implication: Infill

Site Types

Definition and Case Study Proofs

7. Wedge

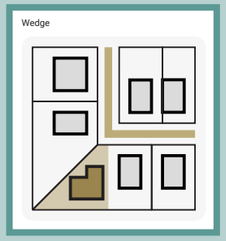
Definition: Typically found on the outer edge of the bend in a suburban road, a wedge site is formed when an existing plot widens out to create a large rear garden which can be subdivided to create a new plot with direct access to the public highway.

Working Example:

Farmstead Road, Metropolitan Workshop

Training Types:

Wedge (Subdivision by terraced, semi-detached, detached).





Capacity Implication: Intensification

8. Residual Land

Definition: Residual land within the freehold of an existing estate.

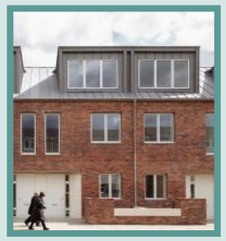
Working Example:

Tollers Lane, Mae

Training Types:

Residual Land.





Capacity Implication: Infill

9. Backland

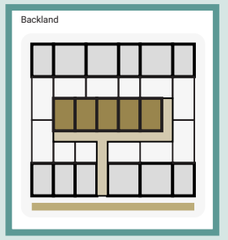
Definition: Typically garages or small industrial sites surrounded on all sides by existing development, usually with a single point of access from the public highway.

Working Example:

Highgate Newtown Community Partnership, RCKa

Training Types:

Vacant backland, developed backland.





Capacity Implication: Infill

10. Landlocked

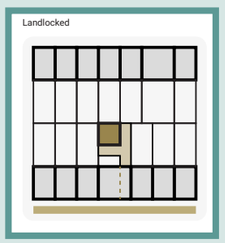
Definition: Landlocked sites are those which do not have direct access to the public highway, and are generally only accessible by passing through the demise of another property. Often these are described as “courtyard” houses.

Working Example:

Courtyard House, Dallas Pierce Quintero

Training Types:

Vacant landlocked, developed landlocked.





Capacity Implication: Infill

11. Street Infill

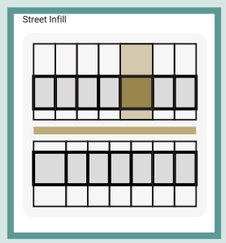
Definition: A gap between two buildings which has direct access to the public highway.

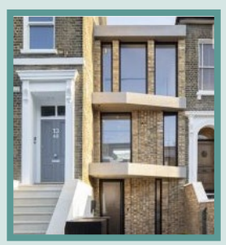
Working Example:

Coach House, Selencky Parsons

Training Types:

Street infill.





Capacity Implication: Infill

12 Vacant Land

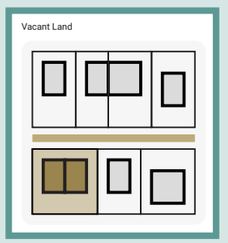
Definition: Surplus open space, such as undeveloped land, garages, or car parks which do not have existing homes on them.

Working Example:

Broadfields Estate, RCKa

Training Types:

Vacant.





Capacity Implication: Infill

Potential Types

Further Types and Character-Led Sub-Typing

Potential Site Types

During the stakeholder consultation process, we'll consider introduction of additional sub-types within our identification process, with the caveat that these somewhat limited to types that are inherently trainable within the parameters of our Small Sites AI tool.

One classification we've already identified as a potential new type is parking areas. Previously, it was not possible to meaningfully distinguish this type from highway types, and declaration of a wholesale capacity potential carried risk.

As our post-classification handling improved, we were able to strategically identify specific instances of this type for capacity potential based on additional policy priorities, like PTAL or the new SAM scores, introducing new nuance.

Character-Led Sub-Types

One further interpretive later we are exploring is the convergence of our site classifications with other sources of geospatial data. These sources, which include the MSOA Deprivation Indices and the Historic England Character Thesaurus, have the potential to introduce new dimensions of qualitative analysis for exploration, and offer further strategic alignment with key policy priorities.

13. Parking

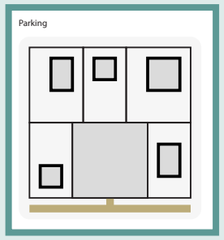
Definition: Parking areas. Identification of this site type could be combined with a PTAL or similar overlay to prioritise areas with good active transport.

Working Example:

Raven's Way, Bell Phillips

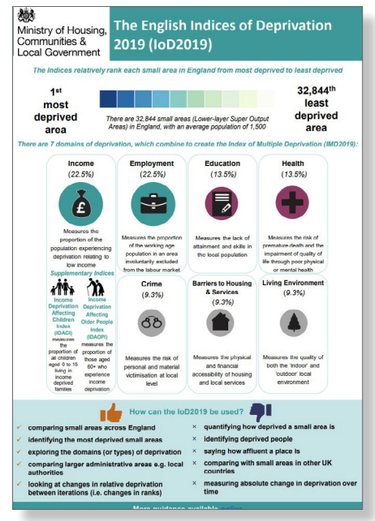
Training Types:

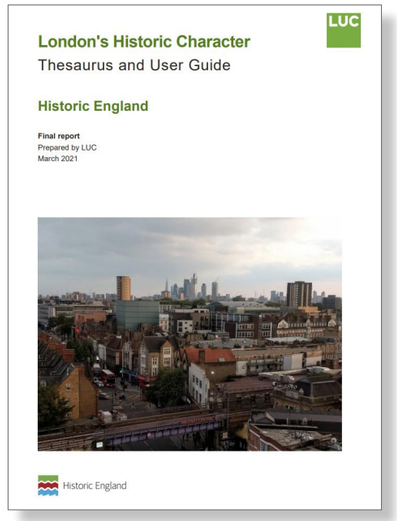
Parking





Capacity Implication: Infill





Key Implications

SSDC Recommendations

Effective design coding requires a comprehensive and unambiguous site classification system that can be applied consistently across London's diverse urban contexts.

We have substantially expanded upon the existing LPG's four site types to develop a comprehensive and scalable site classification system.

Each type has been validated through built precedents and grouped into three strategic categories, infill, intensification, and reconfiguration, that reflect their distinct impacts on existing built fabric at the policy level.

Two key capabilities have been unlocked by this framework.

1. First, the granular typology provides a robust basis for a clear and prescriptive site-specific design guidance that can be tailored to the unique constraints and opportunities of each site type but applied across London.

2. Secondly, our classification system is inherently trainable, and has supported the development of a proprietary AI site identification tool capable of systematically classifying London's small sites. This means we've able to make robust projections for London's small site capacity as an evidence base for the SSDC, and identify key policy priorities based on real data.

The SSDC should structure its design principles around this taxonomy, establishing universal baseline requirements that apply to all small sites, then layering site-type-specific rules that respond to access conditions, adjacencies, and contextual relationships.

This approach should provide the clarity and predictability needed to unlock latent capacity while ensuring design quality and amenity protection are calibrated appropriately to each site type's characteristics.

Early Capacity Projection

Projection Methodology

Extrapolation Methodology

Methodology

As we haven't yet concluded our mapping progress, we've developed an interim projection methodology to help us extrapolate our findings to a London-wide small site capacity.

This is an imperfect methodology with limited accuracy, and can offer us no more than an indication of the mapping potential.

Capacity Profiles

We've identified six borough 'profiles' based on an approximation of prevailing density, character, land use, and geographical relationship. This approach is inherently speculative.

These are:

1. Central - City of London, Westminster, Camden*, Islington, Kensington and Chelsea

2. Inner - Southwark, Tower Hamlets*, Hackney, Lambeth, Hammersmith & Fulham

3. Inner-Outer Transitional - Wandsworth, Lewisham*, Brent, Haringey, Greenwich

4. Outer Suburban - Barnet*, Ealing*, Enfield, Croydon, Redbridge, Merton, Harrow, Hounslow

5. Peripheral Suburban - Bromley, Havering, Hillingdon, Bexley*, Sutton*, Richmond upon Thames, Kingston upon Thames

6. Peripheral Growth - Newham, Barking & Dagenham*, Waltham Forest

Findings from the mapping and capacity extraction of representative boroughs (*) within each of these profiles gives us the basis for London-Wide extrapolation of small site capacity.

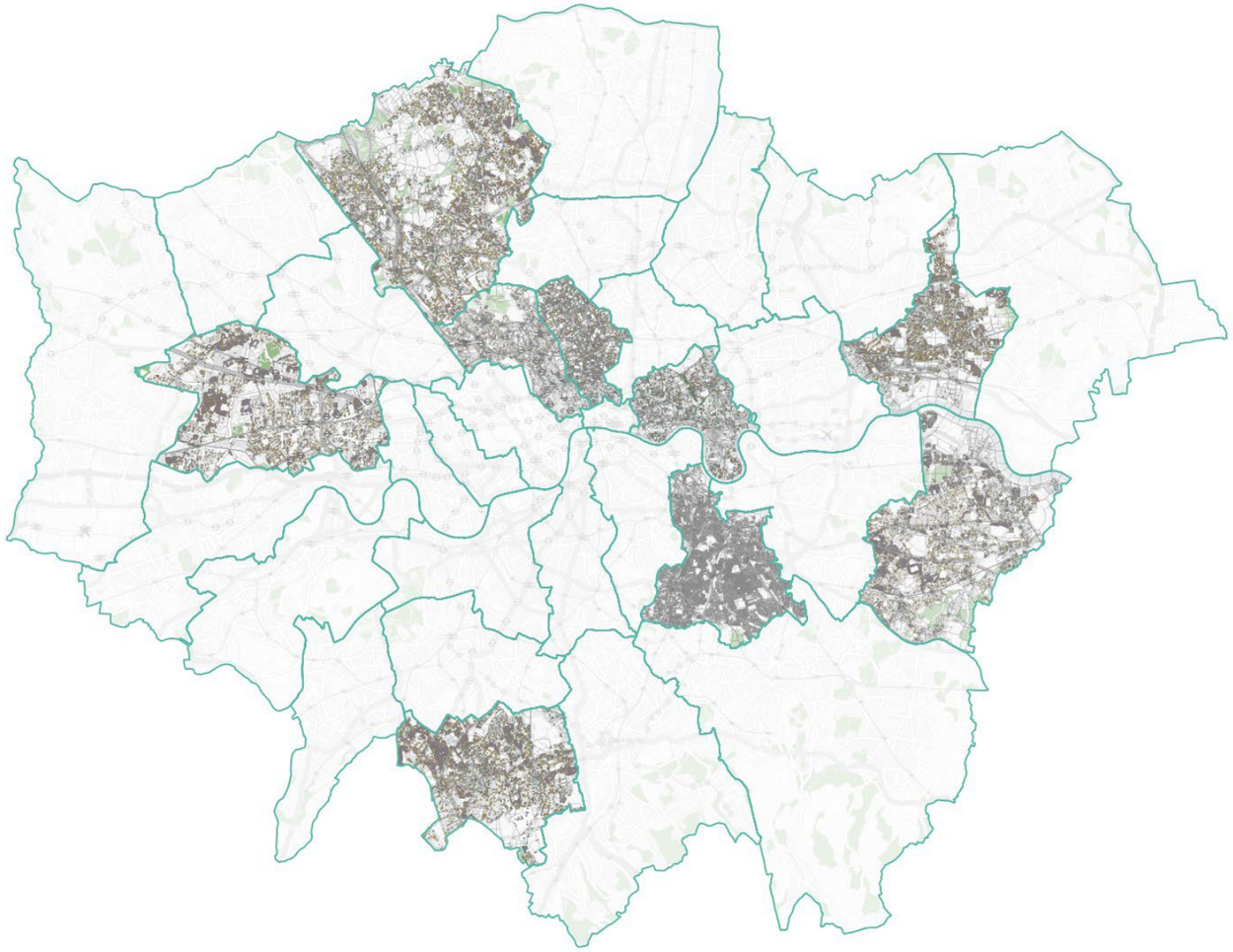
Exclusions

Within our methodology, we've accounted for the exclusion of sites that are not considered to have capacity, either for strategic policy reasons, or for site-specific area thresholds identified through case study analysis.

Limitations

At present, our capacity-finding is limited to sites that meet the designation requirements at the level of their freehold. This excludes opportunities for both land assembly to create development opportunity, and also latent small sites that lie within larger freeholds.

We're currently exploring solutions to unlock this capacity, which we'd expect to be significant.



Extrapolated Capacity

London-Wide Extrapolation

Results Overview

Our extrapolation methodology applied across all 33 London boroughs indicates a total small site capacity potential of approximately 958,000 dwellings across Greater London.

This represents a significant untapped housing resource distributed unevenly across the city's varied urban contexts.

Policy Exclusion Adjustment

We've analysed the impact of strategic policy constraints on development capacity. For now, we have taken a conservative approach, excluding sites that intersect with:

- Designated Open Space
- Flood Risk Zones 2 & 3
- Conservation Areas

Testing this methodology on Lewisham, this level of policy exclusion resulted in a net loss of 43% of capacity (representing 30% of identified sites). We would expect this impact to be lessened significantly through a more nuanced and liberal approach.

To make our estimated capacity more conservative, we've applied this **-43%** adjustment to our projection.

Early Projection

Our extrapolation methodology applied across all 33 London boroughs indicates a total small sites capacity potential of approximately 958,000 dwellings across Greater London, before policy exclusions.

Applying conservative policy exclusions for conservation areas, flood zones, and open space reduces this to approximately **545,000 dwellings**.

Projection Refinement

This figure comes with considerable caveat, and is built on a number of assumptions that we're hoping to substantiate and validate with further mapping efforts.

Table 1: Mapped Representative Capacity

Capacity Profile	Local Authority	Total Qualified Sites	Total Qualified Area (ha)	Total Capacity Potential
Central	Camden	2595	118.99	**11,318 dwellings**
	Islington	3077	111.75	**9,089 dwellings**
Inner	Tower Hamlets	2774	129.10	**11,971 dwellings**
Inner-Outer Transitional	Lewisham	10860	355.72	**24,296 dwellings**
Outer Suburban	Barnet	15299	645.7	**52,437 dwellings**
	Ealing	18787	550.16	**38,322 dwellings**
Peripheral Suburban	Sutton	12730	433.75	**32,895 dwellings**
Peripheral Growth	Barking and Dagenham	6742	199.92	**14,669 dwellings**

Table 2: Extrapolated Capacity *(Extrapolated Capacity = Total Borough Area × Qualified % × Density)*

Capacity Profile	No. of Boroughs	Total Area (ha)	Total Qualified Area (ha)	Total Capacity Potential (dwellings)
Central	5	7320	460	41,702
Inner	5	11,100	724	67,416
Inner-Outer Transitional	5	18,960	1,921	134,070
Outer Suburban	8	40,490	3,405	264,995
Peripheral Suburban	7	53,990	5,345	404,556
Peripheral Growth	3	11,110	615	44,945
TOTAL	33	-	-	**957,684**
Exclusion Adjusted TOTAL	-	-	-	**546,490**

Key Implications

SSDC Recommendations

Understanding the scale and distribution of small sites capacity is essential to validate the policy mandate for the SSDC and inform strategic planning decisions.

Three key implications emerge for the design code's preparation:

1. First, the varying capacity profiles across boroughs suggests the need for local-level guidance that can reflect strategic priorities and capacity distribution within a consistent regional framework.
2. Second, the code should provide clear guidance on how to deliver quality outcomes within policy-constrained contexts, particularly in conservation areas and flood zones, rather than treating these as blanket exclusions.
3. Third, capacity optimization must be embedded as a core design principle, with the code establishing clear methodologies for testing appropriate density and built form on each site type to ensure London's housing targets can be met without compromising design quality.
4. Our findings so far indicate the potential for a significant uplift to small site housing targets in London.

The SSDC should therefore be structured to maximize delivery on high-capacity, low-sensitivity site types while providing robust safeguards for more contentious development scenarios.

Advice & Recommendations

Design Code Draft Scope

Draft Scope

One of our key objectives for the design code is that the final document be concise and structured to ensure ease of use.
The granularity of the below reflects its preparation as a vehicle for early discussions around the code's extent and scope, rather than a fixed proposal.

Our expectation is that this structure will change and develop as the work progresses, responding to the parallel development of the new London Plan.

Part 1: Introduction

- Strategic Context - Ambition
- How to Use this Document

Part 2: Policy Context

- Literature Review
- Policy Context
- Policy Integration

Part 3: Strategic Principles

- Collective Impact
- Character
- Communities
- Capacity for Social Infrastructure

Part 4: Universal Principles

- Height *
- Massing *
- Site Optimisation *
- Overlooking *
- Separation Distances *
- Materials, Detailing and Character
- Inclusive Design
- Internal Space Standards
- External Amenity Space
- Active Transport
- Access, Servicing, and Waste Collection
- Urban Greening Factor
- Affordable Housing Contributions

Part 5: Site-Specific Principles

How to Identify Your Site Type

Infill

- Side Street Infill
- Street Extension
- Rear Street Development
- Residual Land
- Backland
- Landlocked
- Street Infill
- Vacant Land
- Parking

Intensification

- Intensification
- Corner Intensification
- Wedge

Reconfiguration

- Conversion
- Extension
- Air Space
- Subdivision

Part 6: Character Sub-Types

Historic England / Strategic Location Overlay

- High Streets
- Conservation Areas
- Stations

** Universal design principles to be taken forward to site-specific application.*

Schedule of Considerations

Schedule of Considerations

As an initial scoping exercise, we've prepared a schedule of considerations to discuss the structure, form, and content of the design code. This is both to map-out the different scope options for granular aspects of the design code, and also to track decision-making in parallel to wider policy-making.

At present, we haven't excluded any consideration in order to identify the best possible scope for the design code.

We will provide an editable tracker version of the below for comment and notes.

* (R)ed: Least ambitious
(A)mber: Moderately ambitious
(G)reen: Most ambitious

Table 3: Schedule of Considerations

#	Consideration	Notes	**Ambition** (Red/Amber/Green*)	**Prescription** (Could/Should/Must)	Comments / Recommendations
1	**Document Principles**				
	Ambition	What level of ambition for transformative change should be codified within the Small Sites Design Code (SDCC).	-	-	To understand the GLA's strategic ambition.
1.1	**Prescription**	"Must / Could / Should" language has been indicated as preferable within the existing Small Sites LPG.	-	-	Preference indicated for stronger mandate combined with a high-level of prescription.
1.2	**Language**	Code language should be constructed towards positive enforcement, rather than prohibition. Language should be clear, concise, and accessible to lay-person.	-	-	
1.3	**Mandate**	How definitive can the SSDC be in offering planning confidence to schemes demonstrating adoption of the principles.	R: 'Developments should be supported if they meet the design code.' G: 'Developments that meet the design code have permission in principle.'	Should / Must.	Preference indicated for stronger mandate combined with a high-level of prescription.
1.4	**Interaction with London Plan**	'Best Practice' implementation of the London Plan policies.	R: Offer foundational principles and language for the preparation of additional, place-specific guidance. This would lighten language around more subjective policy areas, like character, to allow for flexibility at the local level. A: Recommend/sign-post the policy focus for LAs to develop at the local level, using the SSDC as the basis. G: Preparation an exhaustive and standalone 'default' design code - that takes a position on both objective and subjective considerations.	Could / Should / Must	To understand the intended strategic application of the SSDC: • Is the SSDC chiefly to signpost the policy focus at the local level? • A universal design code that sets the objective baseline principles to act as a policy foundation for LAs? • A design code that institutes both objective and subjective policy criteria - that may then be superseded at the local level or not. A combined approach could be taken by managing language for prescription level - see 1.1 .
1.5	**Interaction with Local Plans**	Balance universal adoption of design principles with flexibility for use as a foundation for locally-determined design codes and further small site guidance. Local Authorities should consider latent small site capacity in the development of their local plans.			

Schedule of Considerations

Schedule of Considerations					
#	**Consideration**	**Notes**	**Ambition**	**Prescription**	**Comments / Recommendations**
1.6	**Social Value Overlay**	Integration of a Cultural Intelligence (CQ) framework to review and monitor preparation of the Small Sites Design Code. Ensuring the SDCC encourages or mandates meaningful and appropriate forms of inclusivity - in both process and design outcomes.	G: Ensure all development considerations are reviewed against a CQ framework, both for scope and their potential outcomes.	Should/Must	To incorporate into processes.
2	**Strategic Principles**				
2.1	**Character**	To be tabled as a discussion point with key stakeholders. Ambition to re-instate the principle of character as an evolving state. Potential for small site development to not only reflect and amplify local character, but to contribute/generate new, positive character.	R: Design proposals to reflect and amplify contextual character, demonstrate understanding. A: Design proposals to contribute positively to local character through design-led responses. G: Acknowledgement of local character as an evolving quality, changing over time. Potential for small site development to generate character.	Could / Should - these principles should scope the ambitions and opportunities that drive the encouragement of small site development.	To understand ambition.
2.2	**Diverse Communities**	Capture the potential of small sites to meet diverse needs at local level - possibly widening guidance to accommodate different cultural modes of living (e.g - intergenerational families, etc).	G: Applying Cultural Intelligence to ensure that design is evidence-based and reflects user needs and lived experience- not just the perspective of the applicant.		The RIBA Inclusive Design Overlay to the Plan of Work provides the structural framework for this, integrating inclusive design principles through five essential team roles and defining the engagement of user groups throughout the design process to ensure co-creation.
2.3	**Local Economies**	Impact of increased density on local areas' ability to sustain social infrastructure. Capturing latent capacity potential on small sites to inform future identification of strategic growth areas,	To be explored with stakeholders to capture strategic priorities.		To explore inclusion.

Schedule of Considerations

Schedule of Considerations					
#	**Consideration**	**Notes**	**Ambition**	**Prescription**	**Comments / Recommendations**
2.4	**Participatory Processes**	Approaches to community engagement could take the form of a pre-determined but adaptable approach that is structured around finding the right questions to be asking. Emphasising early engagement, an evidence-based approach, and anticipating/minimising biases.	A: Define a 'best-practice' approach to engagement for small sites (scale-responsive). G: Mandate an approach to engagement for small sites(scale-responsive).	Could / Should - these principles should scope the ambitions and opportunities that drive the encouragement of small site development.	Offering a pre-defined process for small scale engagement practices can both mandate the incorporation of 'unheard voices' in the development of small sites, as well as giving to clarity to both applicants and developers by providing a baseline of expectation for inclusive practices at planning. We'd suggest a flow-chart methodology as a positive and question-led format for engagement. This should be adaptable to development scale and development type in order to incisively uncover 'pressure points' for each type of small site development - and at different scales.
2.5	**SME Developers**	Encouraging SME developer uptake of small site development.	R: Omit A: Acknowledge challenges G: Identify as a strategic priority		To explore inclusion.
3	**Universal Design Principles**				
3.1	**Height**	What design policies can be adapted to encourage small site development.	To be develops at site-specific level.	Should / Must - clear definition of universal principles, but retain some flexibility for site-specific responses.	Principles to be represented in diagram form for further, type-by-type discussion.
3.2	**Massing**		To be develops at site-specific level.		
3.3	**Site Optimisation**		A: Encourage responsible use of land in providing new homes, and prevent new development from precluding surrounding sites from optimisation.		
3.4	**Overlooking**		R: Deference to London Plan separation distance guidance. A: Statement to encourage design-led solutions and case-by-case appraisal. G: Condition-specific guidance - defining specific small-site configurations and relationships that allow for more permissive but specific separation distances.		
3.5	**Separation Distances**				
3.6	**Inclusive Design**		G: Expansion of consideration beyond physical access, explicitly codifying for sensory, cognitive, and hidden needs.		
3.7	**Internal Space Standards**		G: Permit departure from normative housing typologies (2b3p, 5b6p, etc...) in cases where an express need can be met, either at the level of the individual or the community, (e.g intergenerational living, etc.)		

Schedule of Considerations

Schedule of Considerations					
#	**Consideration**	**Notes**	**Ambition**	**Prescription**	**Comments / Recommendations**
3.8	**External Amenity Space**	What design policies can be adapted to encourage small site development.	R: Deference to London Plan guidance. G: Conditional guidance - e.g: lower or different requirements for sites close to high-quality public green space.	Should / Must - clear definition of universal principles, but retain some flexibility for site-specific responses.	Principles to be represented in diagram form for further, type-by-type discussion. Sustainability/circular economy ambition for small sites to be captured/explored.
3.9	**Car Parking Provision**		R: Deference to London Plan guidance. G: Conditional guidance - lower requirements on small sites - to reflect PTAL/SAM score, or trade-off with cycle provision.		
3.10	**Cycle Parking Provision**				
3.11	**Materials, Detailing and Character**		R: Materiality sympathetic to the existing. G: Explicitly permissive around material specification, providing designs are high-quality and solutions are design-led.		
3.12	**Access, Servicing, & Refuse Collection**		R: Deference to London Plan guidance.		
3.13	**Urban Greening Factor**		R: Deference to London Plan guidance.		
3.14	**Affordable Housing Contributions**		Recommendation language for local authorities? Borough's should be dissuaded from instituting affordable housing levies that diverge from the national requirement.		
4	**Site Specific Design Principles**				
	Infill				
4.1	**Side Street Infill**	Type-specific guidance adding further detail covering the below in response to specific site conditions: - Height - Massing - Optimisation - Overlooking - Separation Distances	Infill - aggressively encourage infill development.	Must - Ensuring interpretation is clear and mandated design responses are clearly scoped..	Draft principles to be represented in diagram form for further, type-by-type discussion.
4.2	**Street Extension**				
4.3	**Rear Street Development**				
4.4	**Residual Infill**				
4.5	**Backland**				
4.6	**Landlocked**				
4.7	**Street Infill**				
4.8	**Vacant Land**				
4.9	**Parking**				

Schedule of Considerations

Schedule of Considerations					
#	**Consideration**	**Notes**	**Ambition**	**Prescription**	**Comments / Recommendations**
	Intensification				
4.10	**Intensification**	Type-specific guidance adding further detail covering the below in response to specific site conditions: - Height - Massing - Optimisation - Overlooking - Separation Distances	A: Intensification - encourage incremental intensification. G: Capture the positive potential of intensification for potential to generate new and positive character. Capture the positive benefits of higher overall density, impact to local amenities.	Must - Ensuring interpretation is clear and mandated design responses are clearly scoped.	Social Value Considerations: - Engagement strategies should take into account difficulty of introducing pro-intensification policies within communities. - Encourage schemes to demonstrate consideration of how design outcomes have aligned the broader vision of thriving and vibrant communities.
4.11	**Corner Intensification**				
4.12	**Wedge**				
	Reconfiguration				
4.13	**Conversion**	Type-specific guidance adding further detail covering the below in response to specific site conditions: - Height - Massing - Optimisation - Overlooking - Separation Distances	R: Positive examples of extension to increase capacity within single-dwellings, without subdivision. A: Express acknowledgement for applicants to subdivide existing housing - explore limiting mechanism, such as no net loss of total bedrooms or an demonstration of need. G: Targeted guidance to encourage uptake of airspace development opportunities, including an explicit widening of defined acceptable characters, likely through precedents.	Must - Ensuring interpretation is clear and mandated design responses are clearly scoped.	Social Value Considerations: - Encouraging retrofit and refurbishment approaches to increase capacity. - Encourage adaptation of existing dwellings to meet specific needs and users.
4.14	**Extension**				
4.15	**Subdivision**				
4.16	**Airspace**				
5	**Character Overlay**				
	Historic England / Strategic Locations				
5.1	**High Streets**	Scope of this section to be discussed further to identify key strategic priorities.	R: Signpost specific locations where Local Authorities should develop additional guidance to respond to unique conditions - regardless of underlying site type. G: Give further guidance on positive design parameters in pre-defined locations.	Must - Ensuring interpretation is clear and mandated design responses are clearly scoped.	Let's review our evidence base against the historic England overlay - to identify and understand the convergence of our site types and HE's character types. Incidences of high overlap could benefit from further coding. Secondly, let's identify character or strategic locations that would benefit from an additional 'character' overlay - this would then need to be an entirely additive layer or lens, that cannot not un-do any of the principles established at type level, but simply code further detail or additional principles. In these areas - it's likely that local policy would come into play. Particularly in respect to character.
5.2	**Stations**				
5.3	**Conservation Areas / Heritage Assets**				

Next Steps

Our Recommendations

The following actions are recommended to progress preparation of the SSDC and manage the evolving policy context.

Scope Finalization - Review the Schedule of Considerations with GLA stakeholders to finalize the design code's scope and ambition, allowing time for internal discussion and potential escalation to political decision-makers where strategic decisions require senior approval.

Stakeholder Engagement Programme - Prepare and deliver a structured workshop programme with borough planning officers, developers, and community representatives to validate the code's scope, ambition levels, and site-type-specific principles.

Design Principle Development - Develop illustrated design principle diagrams for both universal standards and site-specific guidance, suitable for testing and refinement through stakeholder consultation.

Social Value Framework Integration - Establish a robust Cultural Intelligence framework for reviewing the code's development against inclusive design principles, ensuring diverse voices and lived experiences inform policy decisions.

Capacity Projection Refinement - Continue borough mapping to validate extrapolation methodology, integrate GLA and stakeholder strategic priorities, and refine policy exclusion assumptions to improve projection accuracy and confidence.

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London Plan SSDC

Methodology Note

December 2025

2519-RCK-XX-XX-RP-A-00002

Revision Number P00

RCKa



Contents

Revision Number	Status Code	Date Issued
P00	S3: Review	04/12/2025

Methodology Note

Classification and Capacity Methodology

Validation Methodology

Assumptions

Limitations

Classification and Capacity Methodology

Introduction

This methodology note documents the technical approach used to identify and assess small sites for housing capacity across multiple local authority areas. The work forms part of the PropTech Innovation Challenge, a DLUHC-backed programme to accelerate housing delivery through digital tools.

Learning Model

Produce graphically consistent atlas sets for each local authority, based on INSPIRE ID freehold data. At this stage we filter freehold data by area, excluding tiles below 0.01ha and above 0.25ha.

1. These atlas tiles are used to assemble training libraries with examples of each type. This is an iterative process to ensure capture of hard cases and outlier types. These training libraries help train the learning model.
2. Atlas sets are run through a neural network capable of pattern recognition. The only input into this learning model is the .jpg format mapping tiles.
3. The AI tool then classifies these tiles into the universal site types.
4. We then join the site type dataset to the INSPIRE ID geospatial data. At this point we can generate area, perimeter, and coordinates.

Site Types

1. We've explored different methods of classifying site types. Types need to be inherently trainable (demonstrate clear and recognisable patterns) and also meaningfully embed development potential within them.
2. We have a more extensive set of 'training types' which are the types the AI tool uses for classification. This taxonomy is then translated into 'working types', which translate the training types by exclusion, policy handling, or combination into working types based on real-world observation and proven development patterns.
3. We've further grouped our site types into policy groupings based on their interaction with existing capacity and likely sensitivities at the policy level. These are: intensification, infill, and reconfigurations. This was to better inform the interpretive layer.

Our site types and their definitions can be found within our Phase 1 report.

Capacity Projection

1. We analysed a number of built projects that we've typed to our working types, calculating site area and a density per hectare figure. This gave us a baseline potential site capacity per site type embodying real-world constraints. We excluded sites below the minimum observed site area for each site type. Infill site minimums were also adjusted to ensure a minimum yield of 1 home based on area and density, and intensification types a minimum of 2.
2. Prior to calculating capacity, sites are reviewed against strategic policy overlays.
3. Sites falling within designated open space, flood risk zone 3, or green belt are excluded from capacity projections, as these constraints would preclude development. This filtering is applied before capacity formulae, meaning excluded sites do not contribute to projected totals.
4. We then validated and corrected our findings by conducting capacity studies on 10 random samples of each site type and comparing these findings with our predicted capacities, adjusting our target density and site minimums based on an error-handling system based on error distribution.

Validation Methodology

Capacity projections are validated through an iterative review process:

Iterative Review Process

1. Sampling: Randomly sample 10 sites of each site type (limited to types with capacity potential and no policy intersection).
2. Testing: Conduct capacity studies using BlockType for each sampled site, applying a consistent determination protocol (maximising viable dwelling numbers within realistic development constraints).
3. Comparison: Compare manually calculated yields against projection-calculated yields.
4. Adjustment: Adjust target density and site minimums based on error distribution analysis.

Error Handling

1. Errors are triaged by distribution pattern:
2. Systematic bias (consistent across types): Apply scalar calibration factor.
3. Type-dependent patterns (high error in specific types): Calculate type-specific adjustment factors.
4. Characteristic-dependent patterns (non-type attributes): Develop methodology to accommodate.
5. Combination patterns (no discernible pattern): Review methodology or expand derived dataset.

The validation cycle repeats until an acceptable error threshold is achieved (target: ≤10% variance). It is expected that this validation will reduce the potential capacity figures.

Density assumptions derived from built case studies usefully embed real-world constraints. However, they also represent a self-selecting sample: sites that have been developed are those where conditions were already favourable. This introduces a positive bias into capacity projections that validation seeks to correct.

Assumptions

Assumptions

Site Typing Assumptions

1. INSPIRE ID freehold data provides a reliable spatial baseline for site identification.
2. Sites below 0.01ha and above 0.25ha can be excluded as they fall outside the designation.
3. Graphically consistent .jpg mapping tiles contain sufficient visual information for neural network pattern recognition.
4. Iterative assembly of training libraries adequately captures hard cases and outlier types.

Site Type Assumptions

1. Site types can be both inherently trainable (demonstrating clear patterns) and meaningfully embed development potential.
2. Training types can be reliably translated into working types through exclusion, policy handling, or combination.
3. Policy groupings (intensification, infill, reconfigurations) appropriately capture interaction with existing capacity and policy sensitivities.

Capacity Assumptions

1. Built project case studies provide representative density figures that embody real-world constraints.
2. Minimum observed site areas per type are appropriate thresholds for viability.
3. A minimum yield of 1 home for infill types and 2 homes for intensification types reflects realistic development thresholds.
4. Random sampling of 10 sites per type provides sufficient representation for validation.

Limitations

Data Source Limitations

1. Freehold-only data: The current denomination of ownership (INSPIRE ID freehold data) is our best available source for identifying small sites, but captures only those defined by freehold. Early work to add leasehold-denominated data is in progress. Initial estimates suggest an addition of approximately 24% (16k as a proportion of 67k) to the small site data currently held – however, it's likely that many of these latent small site opportunities will fall disproportionately into our 'full fill' site type, and we may also see as significant proportion of site types excluded from capacity consideration by falling underneath capacity thresholds on the site type thresholds.
2. Our geospatial process means there is limited scope for tuning or further understanding based on geometric or spatial data.

Classification Limitations

1. Image-only input: The neural network relies solely on .jpg mapping tiles, meaning non-visual attributes (ownership, planning history, access rights) are not factored into classification.
2. Training library coverage: Despite iterative refinement, some genuine outlier types may be misclassified due to niche gaps in the training libraries.
3. Geographic bias: The baseline training libraries were developed from Lewisham-specific typologies. While expansion to Ealing, Liverpool, and Bracknell Forest has diversified the training data, some regional site configurations may remain under-represented, potentially affecting classification accuracy in areas with distinct urban morphologies.

Capacity Limitations

1. Case study representation: Some site types have limited built project examples, reducing confidence in derived density figures.

Validation Limitations

2. Resourcing constraints: Significant resourcing requirement means that achieving a statistically significant number of manually validated capacity studies is very difficult.

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London Plan Small Sites

Phase 3 Report



January 2026

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Revision Number P01

RCKa

London Plan Meaningfully Phase 3 Report

Revision Number	Status Code	Date Issued
P00	S3: Review	09/12/2025

Site Classification

Universal Site Classification

Policy Tiers

Historic England Character Types

Historic England Dataset

Cultural Intelligence Framework

CQ Overlay

Site Types

Intensification

Infill (Low Variance)

Infill (High Variance)

Reconfiguration

Capacity Mapping

Mapping

Capacity Potential by Type

Capacity Potential by Character

Advice and Recommendations

Design Code Draft Scope

Schedule of Considerations

Next Steps

Executive Summary

This report constitutes fulfilment of the Phase 3 criteria for the development of the London-wide Small Sites Design Code (SSDC).

Building on the policy context established in the Phase 1 report, we have now completed the mapping exercise and classified all designated small-site freeholds across London. These findings have enabled a refinement of our projection methodology, allowing us to better understand the full potential capacity of small sites at a London-wide scale.

By cross-referencing the resulting site typologies with the Historic England (HE) Character Thesaurus, we have also introduced a qualitative dimension to our capacity analysis. This has supported an assessment of potential political and heritage-related sensitivities, and has allowed us to draw more context-specific conclusions regarding borough composition, prevailing character, and existing density conditions.

The concluding section of this document updates the Schedule of Considerations, recording our recommendations and progress in relation to the SSDC's potential scope, form, and level of ambition.

Phase Progress

The project is structured around the Phase 3 deliverables, establishing a draft baseline for the technical parameters of the design code.

- **Phase 1 Contextual Analysis**
- **Phase 2 Stakeholder Engagement**
- **Phase 3 Technical Analysis**
- **Phase 4 Design Code**
- **Phase 5 Consultation Amendments**
- **Phase 6 Online Version**

Next Steps

Our work on Phase 2 is still active, working to identify key stakeholders and a programme of consultation to help review the emerging design code.

Following an initial review period, RCKa will meet with the Greater London Authority (GLA) to consider how the Phase 3 findings may support the preparation of a robust evidence base, and to identify any additional strategic policy scenarios to be applied to the capacity projections.



Site Classification

Universal Site Classification

Opportunity Site Types

We've identified 13 site types that represent defined opportunities for additional housing capacity.

These types derive from observed successful small site developments across the UK, each embodying proven approaches to optimising land use while maintaining housing quality.

Capacity assumptions are embedded within the type definitions, making yield estimation intrinsic to classification.

Intensification

Site Intensification

The replacement of an existing residential building with a larger development resulting in a net increase in the number of dwellings on the sites.

Corner Intensification

The development of an existing residential corner plot, which results in a net gain the number of dwellings. Corners represent opportunities for additional height.

Wedge

Typically found on the outer edge of a bend in a suburban road, this type is formed when a plot widens to create a large rear garden.

Infill (Low Variance)

Side Street Infill

Development to the rear of an existing dwelling house where the garden has direct access to the public highway.

Street Extension

Usually where a new dwelling is added to the end of an existing row of terraces.

Rear Street Development

Where an existing dwelling has a deep garden, the end of which has direct access to the public highway, allowing new dwellings to be built facing onto the street.

Street Infill

A gap between two buildings with direct access to the public highway.

Infill (High Variance)

Backland

Typically garages or small industrial sites surrounded on all sides by existing development, usually with a single point of access from the public highway.

Landlocked

Landlocked sites are those which do not have direct access to the public highway, and are generally only accessible by passing through the demise of another property. Often these are described as "courtyard" houses.

Residual Infill

Residual Infill within the freehold of a larger plot, often existing estates.

Vacant Land

Surplus open space, such as undeveloped land, garages, or car parks which do not have existing homes on them.

Reconfiguration

Extension and Subdivision

The change of use (and potentially the extension) of an existing building into new homes, where there is a net gain of at least one dwelling.

Airspace

Upward extension of an existing development to provide new capacity within the existing footprint.

Universal Site Classification

Normative and Exclusion Site Types

Our site typology also identifies categories that do not represent distinct development opportunities.

'Normative types' (terraced, semi-detached, and detached houses) have intensification potential, but they require a different approach to capacity projection than our opportunity types.

Opportunity types, like backland sites and corner plots, have specific spatial characteristics that allow us to estimate capacity based on observed successful developments.

Normative types, however, are general property configurations whose development potential depends heavily on site-specific conditions. A critical consideration is the cumulative impact of change within established streets and neighbourhoods.

Some site types are excluded from development consideration altogether, as **'exclusion types'**

Normative

Terraced

Terraced housing, where one dwelling shares two party walls with other dwellings either side.

Suggested Opportunity Type: Extension and Subdivision.

Semi-Detached

Housing where a dwelling shares one party wall with another dwelling.

Suggested Opportunity Type: Extension and Subdivision.

Detached

Detached dwelling - this type has significant natural variance.

Suggested Opportunity Type: Intensification, Extension and Subdivision.

Full Fill / Partial Fill

Where the freehold defines the exact extent of the building footprint.

Suggested Opportunity Type: Airspace (FF) and Exclusion (PF).

Exclusion

Highway

Land is designated highway or private access road.

Precludes Development.

Designated Open Space

Green space that falls within an open space policy designation, such as allotments, playing fields, parks, the green belt, or nature reserves.

Precludes Development.

Water

Freeholds that define areas of water, or sites that are majority water.

Precludes Development.

Narrow Strip or Relict

Freeholds that define irregular and poorly proportioned land - often residual, defining easements, or strips of pedestrian pavement or boundary areas.

Precludes Development.

Alternative Boundaries

Subdivided Freeholds

Freeholds containing multiple dwellings under single ownership, typically housing estates or composite developments.

These represent aggregations of normative property types within unified ownership boundaries, with some showing evidence of erosion through right-to-buy or similar buy-outs.

We are developing a methodology to identify small site opportunities within larger freeholds using leasehold boundary data, though this requires further refinement to address the distinct descriptive properties of leasehold ownership.

Policy Tiers

Infill, Intensification, and Reconfiguration

For the purpose of the design code, we've found it useful to group our site types into three distinct policy tiers: **Infill, Intensification,** and **Reconfiguration.**

We've set out some key considerations for each policy tier, looking to summarise the different potential interactions each tier has with urban grain, character and political risk.

We have marked some types as **high variance types -** these resist representative illustration due to the inherent variation in their site condition by type.

We're exploring alternative ways of coding for these sites, using case studies and more general principles.

Table 1: Policy Tier Breakdown

1. Intensification	2. Infill	3. Reconfiguration
Increasing capacity through redevelopment of existing buildings.	**Development of sites with no existing residential capacity.**	**Altering existing built form to increase capacity without total redevelopment.**
Site Types		
1.1 Intensification 1.2 Corner Intensification 1.3 Wedge	2.1 Low Variance Sub-Tier: 2.1.1 Side Street Infill 2.1.2 Street Extension 2.1.3 Rear Street Development 2.1.4 Residual Infill 2.2 Variable Sub-Tier: 2.2.1 Backland 2.2.2 Landlocked 2.2.3 Street Infill 2.2.4 Vacant Land (inc. Parking)	3.1 Subivision (with/without Extension) 3.2 Airspace
Urban Grain Impact		
Capacity increase within existing built footprint. Typically maintains open space within plots as redevelopment.	Densifies urban grain by introducing built form where none currently exists. Reduces open space within plots and blocks, though can reinforce street pattern where completing gaps in frontages.	Minimal change to urban grain. Built footprint remains mostly unchanged; capacity increase is achieved through internal subdivision or vertical addition.
Character Impact		
Can significantly alter or disrupt the prevailing character of an area. Most sensitive where existing buildings contribute positively to local character.	Impact varies by type - infill can reinforce character where responding to established building lines and proportions, but may also affect the perceived openness.	Limited. Subdivision typically involves minimal visible change to streetscape. Airspace development alters roofscape and may require sensitivity in conservation areas or where roof form is a notable contribution to local character.
Potential Political Risk		
Often controversial due to its reliance on redevelopment, which entails partial or total loss of existing built fabric.	Generally lower risk as no existing homes are displaced, however, infill development can attract opposition around loss of green space and perceived overdevelopment in an area.	Subdivision raises concerns about loss of family-sized homes and pressure on local services. Airspace development can face heritage or amenity objections in sensitive locations.
Capacity Assumptions		
Net gain calculated against existing capacity using type-specific multipliers. Site minimums require a minimum net gain of 2 homes.	Infill will always result in a net gain - a capacity of 0 is assumed for infill sites, and site minimums require a minimum capacity yield of 1.	Not currently modelled. Subdivision and airspace capacity require individual building assessment rather than site-level projection.

Historic England Character Types

Historic England Dataset

Narrow Types

To understand how our identified site types relate to their architectural context, we've intersected the site classifications with Historic England's Character Thesaurus.

This spatial analysis reveals the predominant character types associated with development opportunities across London.

The most frequently occurring character types in our dataset include:

- Basic Terrace
- Villas
- Metroland Estate
- Speculative Estate
- Low Rise Blocks
- Mid Rise Blocks
- High Rise Blocks
- Shopping Streets

Opposite is some sampling of wedge types in different character areas. The presentation of these character types shows significant variation and overlap.

Basic Terrace







Metroland







Speculative Estate



Illustrative Contexts

Character Generalisation

We've generalised the ten most common character types into four key illustrative contexts, which we can use to contextualise our site types within the design code.

The inconsistency in character presentation limits the value of the Historic England dataset in defining explicit site parameters.

We therefore propose a generalised approach: identifying the top three character types for each opportunity type, then further distilling these into terraced versus semi-detached/detached contexts.

This creates universal illustrative frameworks for the design code, ensuring development guidance is presented within appropriate architectural settings while maintaining broad applicability.



Cultural Intelligence Overlay

CQ Overlay

Cultural Intelligence

We're working with Marsha Ramroop to develop a Cultural Intelligence (CQ) Overlay to the policy tiers, identifying the key priorities for each policy tier.

We've set out some initial ambitions for each policy tier, working at different scales of potential benefit, from individuals to wider public good.

This guidance should be further tailored to application type, ensuring the recommendations are appropriate to the scale of proposed development.

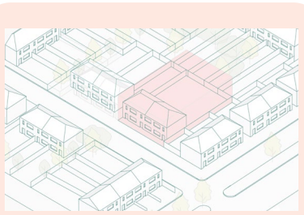
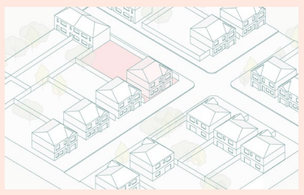
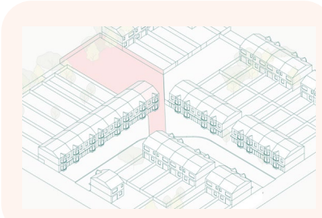
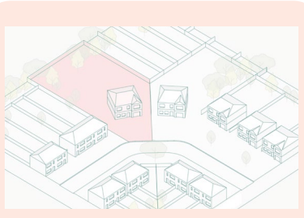
Table 3: CQ Overlay

1. Intensification	2. Infill	3. Reconfiguration
Increasing capacity through redevelopment of existing buildings.	**Development of sites with no existing residential capacity.**	**Altering existing built form to increase capacity without total redevelopment.**
CQ Focused Approach		
Intensification: This tier carries the highest political risk because it involves the potential loss or total replacement of existing built fabric. **A robust CQ approach to community engagement should be the focus here in order to manage opposition effectively.**	**Infill:** This tier generally has a lower political risk but still attracts opposition regarding the loss of green space and perceived overdevelopment. **The CQ overlay here would focus on reinforcing character and managing the perceived openness of the neighbourhood.**	**Reconfiguration:** This tier has a limited impact on the urban grain but raises concerns about the loss of family-sized homes (through subdivision) or heritage objections (through airspace development). **Therefore, the CQ focus is on ensuring the adaptations meet specific, evidenced user needs.**
Impact & Focus		
Happier individuals Intensification should deliver high-quality homes that support comfort and wellbeing through good layouts, access to daylight, privacy and adaptable internal space, ensuring increased density does not compromise living standards. **Good neighbours** Development should respond carefully to its surroundings, minimising impacts on neighbouring properties and contributing positively to the street through appropriate scale, massing and active frontages. **Inclusive communities** Where development is concentrated, proposals should demonstrate how increased density supports inclusive communities, through an appropriate housing mix, accessible design and, where relevant, contributions to local social infrastructure or shared spaces. **Stronger London** Intensification supports sustainable growth by making efficient use of well-located sites, optimising existing infrastructure and contributing to housing delivery in accessible, connected locations.	**Happier individuals** Infill development should create well-designed, functional homes that provide good living conditions, including access to daylight, private amenity space and a clear sense of address. **Good neighbours** Proposals should integrate sensitively into established residential settings, respecting existing scale, character and relationships to ensure new homes sit comfortably within their context. **Inclusive communities** Small-scale infill should support balanced and mixed communities by responding to local housing need and reinforcing continuity, activity and belonging within the neighbourhood. **Stronger London** Infill contributes incrementally to London's housing supply by making efficient use of underused land, supporting sustainable growth while maintaining local character.	**Happier individuals** Reconfiguration should prioritise improving the quality, size and adaptability of homes, particularly family-sized or accessible accommodation, responding to evidenced housing need and changing household requirements. **Good neighbours** Alterations and extensions should be proportionate and well-integrated, maintaining positive relationships with neighbouring properties through careful consideration of scale, privacy and outlook. **Inclusive communities** By enabling households to remain within their communities as needs change, reconfiguration supports social stability, inclusivity and a mix of household types. **Stronger London** Reconfiguration supports a resilient and sustainable London by extending the life of existing buildings, reducing environmental impact and contributing to long-term housing supply.

Site Types

1.1 Intensification

Code Structure & Illustrative Context

	A. Terraced Context	B. Suburban Context	C. Multi-Dwelling Blocks	D. High Streets
Site Intensification The replacement of an existing residential building with a larger development resulting in a net increase in the number of dwellings on the sites.				
Corner Intensification The development of an existing residential corner plot, which results in a net gain the number of dwellings. Corners represent opportunities for additional height.				
Wedge Typically found on the outer edge of a bend in a suburban road, this type is formed when an plot widens to create a large rear garden.				

Design code parameters vary by policy tier, with prescription levels calibrated to presumed development patterns

Intensification sites benefit from stable, well-established urban patterns where limited typological variation enables clear, prescriptive design code parameters.

Height and Massing

Establish clear quantitative requirements that work within existing building lines. Parameters typically add height to existing footprints or develop corner plots, maintaining the established built form scale.

Site Optimisation

Maximise site coverage while respecting established plot patterns and building lines. The constrained scale of intervention allows for precise optimisation rules specific to each character type.

Overlooking and Separation Distances

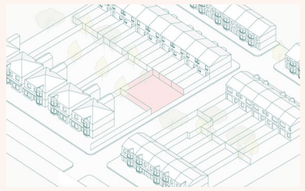
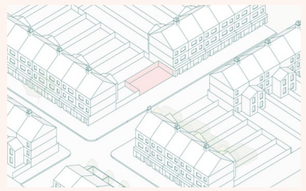
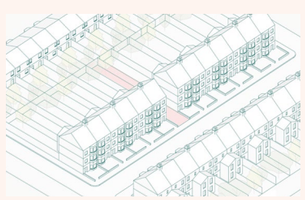
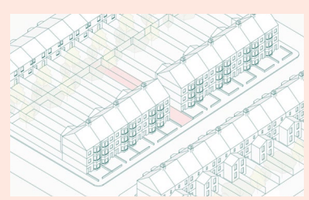
Apply standard separation distances drawn from the prevailing contexts. The limited scale of change means existing relationships can persist.

Strategic Ambition

Increasing density by concentrating new capacity within strategic locations, and preserving the prevailing neighbourhood character.

2.1 Low Variable Infill

Code Structure & Illustrative Context

	A. Terraced Context	B. Suburban Context	C. Multi-Dwelling Blocks	D. High Streets
Side Street Infill Development to the rear of an existing dwelling house where the garden has direct access to the public highway.				
Street Extension Usually where a new dwelling is added to the end of an existing row of terraces.				
Rear Street Development Where an existing dwelling has a deep garden, the end of which has direct access to the public highway, allowing new dwellings to be built facing onto the street.				
Street Infill A gap between two buildings with direct access to the public highway.				

Design code parameters vary by policy tier, with prescription levels calibrated to presumed development patterns

Low variable infill exhibits consistent development patterns despite greater typological range, enabling detailed parametric guidance based on relative relationships.

Height and Massing

Define relative rules that respond to adjacent development patterns and Historic England character type. Establish proportional relationships to neighbouring buildings rather than absolute heights.

Site Optimisation

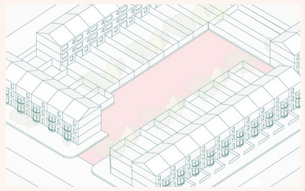
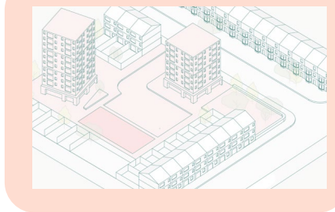
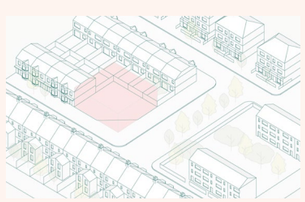
Balance efficient land use with contextual sensitivity. Optimisation follows established plot rhythms and building-to-street relationships specific to the character area. Overlooking and Separation Distances Draw separation standards from the prevailing context. Parameters respond to the presumed pattern of development and typical privacy expectations within each character type.

Strategic Ambition

Strengthen street character and urban grain through considerate development that respects privacy, maintains daylight, and delivers net housing gain with minimal disruption to established building lines.

2.2 High Variable Infill

Code Structure & Illustrative Context

	A. Terraced Context	B. Suburban Context	C. Multi-Dwelling Blocks	D. High Streets
Backland Typically garages or small industrial sites surrounded on all sides by existing development, usually with a single point of access from the public highway.				
Landlocked Landlocked sites are those which do not have direct access to the public highway, and are generally only accessible by passing through the demise of another property. Often these are described as “courtyard” houses.				
Residual Infill Residual Infill within the freehold of a larger plot, often existing estates.				
Vacant Land Surplus open space, such as undeveloped land, garages, or car parks which do not have existing homes on them.				

Design code parameters vary by policy tier, with prescription levels calibrated to presumed development patterns

High variable infill demands flexible, performance-based parameters due to diverse site conditions and varied contextual characters.

Height and Massing

Use precedent-driven approaches rather than strict technical definitions. Parameters frame acceptable design responses through exemplar relationship definitions, allowing site-specific responses while maintaining quality thresholds.

Site Optimisation

Establish performance criteria that allow for on-site specificity. Code works through general principles and target densities calibrated to character area capacity rather than prescriptive site coverage rules.

Overlooking and Separation Distances

Respond to site access patterns and neighbouring uses rather than fixed minimums. Separation guidance accounts for the variety of access conditions - from landlocked backland to street frontage sites.

Strategic Ambition

Densify urban fabric by introducing well-designed built form in underutilised spaces through opportunity-led placemaking.

3.0 Reconfiguration

Code Structure & Illustrative Context

Design code parameters vary by policy tier, with prescription levels calibrated to presumed development patterns

Reconfiguration requires balanced guidance that encourages ambition while demanding rigorous site-specific assessment.

Height and Massing

Establish broad envelopes rather than prescriptive limits. Parameters mandate demonstration of how schemes achieve efficient accommodation while responding to local character. Vertical addition and extension require particular attention to roofline sensitivity.

Site Optimisation

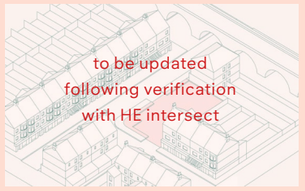
Require rigorous site optimisation studies showing how schemes maximise capacity through careful design. The scale of intervention demands comprehensive demonstration of efficiency, particularly for rooftop and airspace development.

Overlooking and Separation Distances

Apply heightened scrutiny given the potential to introduce new dwelling types into sensitive locations. Separation requirements must account for comprehensive change of use and subdivision creating multiple new homes from single dwellings.

Strategic Ambition

Enable comprehensive redevelopment and adaptable housing solutions that meet unique needs while maintaining neighbourhood amenity - navigating sensitive contexts through careful design that demonstrates positive contributions to local character and housing offer.

	A. Terraced Context	B. Suburban Context	C. Multi-Dwelling Blocks	D. High Street
Extension and Subdivision The change of use (and potentially the extension) of an existing building into new homes, where there is a net gain of at least one dwelling.				
Airspace Upward extension of an existing development to provide new capacity within the existing footprint.				

Capacity Mapping

Mapping

Capacity Summary

We've mapped and typed all of Greater London's small sites using our universal site classifications. London has ~**2,045,000 small sites** that qualify for capacity potential (>0.01ha, <0.25ha).

Prior to any handling, exclusions, or further data intersection, we've mapped a total capacity of **722,074 homes** within the opportunity types.

We're still identifying assumptions regarding the 'site intensification type', which will work with normative housing types to project potential capacity (see chapter 1) and the two reconfiguration types.

These types entail additional complexity because they interact with existing capacity and persist beyond any definition by strategic location - conceivably, they could apply to all normative types.

We'll discuss these types within the upcoming stakeholder workshops to determine some assumptions - it's possible that localised 'flip-rates', or rates of change over the housing delivery target periods could help us identify optimum assumptions for these patterns of development, presuming a policy context that encourages them - safeguards withstanding.

Extrapolated Capacity Projection

Our previous extrapolated capacity gave us a capacity yield within 2.5% of our total mapped capacity, (pre-handling).

Extrapolated Capacity	**957,684 homes**
Mapped Capacity:	**980,444 homes**
Net Change (Pre-Handling)	**+2.38%**

This ratifies use of our borough profiling for capacity-based assumptions, and suggest these could be a useful tool or shorthand for policy-making in capacity-specific dimensions.

These profiles were:

1. **Central**
2. **Inner**
3. **Inner-Outer Transitional**
4. **Outer Suburban**
5. **Peripheral Suburban**
6. **Peripheral Growth**



Small Sites Capacity

Capacity Potential by Site Type

This table shows capacity correlation with site type, and suggests which site types, if aligning with broader strategic priorities, might offer the most benefit from a strong policy mandate.

Capacity is based on observational site minimums and densitiies using a selection of case study projects. It's our intention to refine this further through randomly sampled capacity testing of our identified sities.

Note: We've excluded sites that lie within Flood Zone 3 or any open space designations.

Table 4: Capacity Breakdown by Opportunity Type (Qualified Sites Only)

Site Type	Valid Sites Count	% of Total Sites	Capacity Yield	% of Capacity Yield
Intensification				
Site Intensification[1]	--	--	--	--
Corner Intensification	23,357	1.14%	199,656	27.66%
Wedge	37,305	1.82%	83,114	11.51%
Intensification Total	**60,662**	**2.97%**	**282,770**	**39.16%**
2.1 Infill - Low Variance				
Side Street Infill	52,172	2.55%	45,995	6.37%
Street Extension	31,422	1.54%	28,484	3.95%
Rear Street Development	200,885	9.82%	173,794	24.07%
Street Infill	313	0.02%	242	0.03%
Infill (LV) Total	**284,792**	**13.91%**	**248,515**	**34.46%**
2.2 Infill - High Variance				
Backland	2,519	0.12%	526	0.07%
Landlocked	8,468	0.41%	631	0.09%
Residual Infill	37,430	1.83%	138,765	19.22%
Vacant Land	5,656	0.28%	21,792	3.02%
↳ Parking[2]	0 / 7,508	0.37%	0 / 22,477	3.11% (potential)
↳ Greenspace[2]	0 / 13,851	0.68%	0 / 6,598	0.91%(potential)
Infill (HV) Total	**75,432**	**0.87%**	**190,789**	**26.38%**
3.0 Reconfiguration				
Extension and Subdivision[1]	--	--	--	--
Airspace[2]	--	--	--	--
Reconfiguration Total	--	--	--	--
TOTAL	**420,886** of 2,044,797	**20.65%**	**722,074 homes**	**100%**

[1]Capacity projection to be unlocked through assumption construction around local 'rate of change'.
[2]Capacity projection to be unlocked strategic location considerations, i.e - shopping streets only, SAM score.

Small Sites Capacity

Capacity Potential by Historic England Type

This table shows capacity correlation with HE character area, suggesting which types of neighbourhoods might be most affected by a strong policy mandate.

Table 6: Site Type by Character (Top-3)	
Corner Intensification	Metroland 39% Basic Terrace 22% Speculative Estate 17%
Wedge	Metroland 45% Basic Terrace 22% Speculative Estate 17%
Side Street Infill	Metroland 38% Basic Terrace 25% Speculative Estate 14%
Street Extension	Metroland 38% Basic Terrace 27% Speculative Estate 13%
Rear Street Development	Metroland 40% Basic Terrace 24% Speculative Estate 16%
Residual Infill	Metroland 31% Basic Terrace 25% Speculative Estate 11%
Backland	Metroland 30% Basic Terrace 26% Speculative Estate 12%
Landlocked	Metroland 39% Speculative Estate 33% Basic Terrace 13%
Street Infill	Metroland 35% Basic Terrace 29% Speculative Estate 11%
Vacant Land	Metroland 29% Basic Terrace 24% Speculative Estate 14%

Table 7: Outlier Character Types by Site Type (Top-3)	
High Rise Blocks (1,342 dwellings)	Residual Infill 37% Corner Intensification 21% Rear Street Development 11%
Mid-Rise Blocks (5,947 dwellings)	Residual Infill 38% Corner Intensification 19% Rear Street Development 16%
Low Rise Blocks (10,045 dwelling)	Residual Infill 29% Corner Intensification 24% Rear Street Development 19%
Municipal Estate (939 dwellings)	Residual Infill 24% Rear Street Development 17% Corner Intensification 17%
Shopping Street (20,597 dwellings)	Residual Infill 26% Rear Street Development 24% Corner Intensification 21%

Table 5: Capacity Breakdown by Historic England Type (Qualified Sites Only)

Character Type (by Illustrative Context)	All Sites Count	% of Total Sites	Capacity Yield	% of Capacity Yield
A. Terraced Context				
Basic Terrace	517,512	25.31%	171,704	23.78%
Grand Terrace	75,237	3.68%	16,385	2.27%
Terraced Subtotal	**592,749**	**28.99%**	**188,089**	**26.05%**
B. Suburban Context				
Metroland Estate	735,933	35.99%	289,997	40.17%
Speculative Estate	285,317	13.95%	115,939	16.06%
Garden Suburb	11,318	0.55%	4,334	0.60%
Park Suburb	6,947	0.34%	2,495	0.35%
Modest Semi-Detached	52,884	2.59%	19,654	2.72%
Villas	64,464	3.15%	28,269	3.91%
Cottage Estate	5,314	0.26%	1,823	0.25%
Suburban Subtotal	**1,162,177**	**56.83%**	**462,510**	**64.06%**
Multi-Dwelling Blocks				
Low Rise Blocks	48,508	2.37%	10,045	1.39%
Mid Rise Blocks	30,714	1.50%	5,947	0.82%
High Rise Blocks	2,956	0.14%	1,342	0.19%
Municipal Housing Estate	8,512	0.42%	2,916	0.40%
Multi-Dwelling Blocks Subtotal	**90,690**	**4.43%**	**20,250**	**2.80%**
High Street				
Shopping Street	61,631	3.01%	20,597	2.85%
High Street Subtotal	**61,631**	**3.01%**	**20,597**	**2.85%**
Other				
Other Subtotal	**137,550**	**6.73%**	**30,628**	**4.24%**
TOTAL	**2,044,797**	**100%**	**722,074**	**100%**

Small Sites Capacity

Capacity Potential by draft SAM scores

This table shows capacity correlation with the draft SAM scores, and suggests what proportion of potential capacity is already supported by transport and community infrastructure.

Table 8: Capacity Breakdown by Draft SAM Score (Qualified Sites Only)

SAM Score	Sites Count	% of Total Sites	Capacity Yield
1	31,737	1.6%	5,388
1.5	155	0.0%	18
2	161,075	7.9%	72,088
2.5	4,040	0.2%	1,526
3	519,894	25.4%	203,025
3.5	5,523	0.3%	2,609
4	292,412	14.3%	122,358
4.5	5,581	0.3%	2,477
5	308,858	15.1%	124,619
5.5	8,815	0.4%	2,685
6	549,148	26.9%	147,799
6.5	4,956	0.2%	1,050
7	147,936	7.2%	35,522
Null	4,667	0.2%	910
TOTAL	**2,044,797**	**--**	**722,074**

Advice & Recommendations

Design Code Draft Scope

Draft Scope

One of our key objectives for the design code is that the final document be concise and structured to ensure ease of use.
The granularity of the below reflects its preparation as a vehicle for early discussions around the code's extent and scope, rather than a fixed proposal.

Our expectation is that this structure will change and develop as the work progresses, responding to the parallel development of the new London Plan.

Part 1: Introduction

- Strategic Context - Ambition
- How to Use this Document

Part 2: Policy Context

- Literature Review
- Policy Context
- Policy Integration

Part 3: Strategic Principles

- Collective Impact
- Character
- Cultural Intelligence

Part 4: Universal Principles

- Materials, Detailing and Character
- Inclusive Design
- Internal Space Standards
- External Amenity Space
- Active Transport
- Access, Servicing, and Waste Collection
- Urban Greening Factor
- Affordable Housing Contributions

- Height *
- Massing *
- Site Optimisation *
- Overlooking *
- Separation Distances *

Part 5: Site-Specific Principles

Intensification

- Intensification
- Corner Intensification
- Wedge

Infill

- Side Street Infill
- Street Extension
- Rear Street Development
- Residual Infill
- Backland
- Landlocked
- Street Infill
- Vacant Land
- Parking

Reconfiguration

- Subdivision with Extension
- Air Space

** Universal design principles to be taken forward to site-specific application.*

Schedule of Considerations

GLA Values - CQ and values alignment.

CQ Framework = Drive, Knowledge, Strategy, Action.

Schedule of Considerations

As an initial scoping exercise, we've prepared a schedule of considerations to discuss the structure, form, and content of the design code. This is both to map-out the different scope options for granular aspects of the design code, and also to track decision-making in parallel to wider policy-making.

At present, we haven't excluded any consideration in order to identify the best possible scope for the design code.

We will provide an editable tracker version of the below for comment and notes.

* (R)ed: Least ambitious
(A)mber: Moderately ambitious
(G)reen: Most ambitious

Table 3: Schedule of Considerations

#	Consideration	Notes	**Ambition** (Red/Amber/Green*)	**Prescription** (Could/Should/Must)	Comments / Recommendations
1	**Document Principles**				
	Ambition	What level of ambition for transformative change should be codified within the Small Sites Design Code (SSDC).	-	-	To understand the GLA's strategic ambition.
1.1	**Prescription**	"Must / Could / Should" language has been indicated as preferable within the existing Small Sites LPG.	-	-	Preference indicated for stronger mandate combined with a high-level of prescription.
1.2	**Language**	Code language should be constructed towards positive enforcement, rather than prohibition. Language should be clear, concise, and accessible to lay-person.	-	-	
1.3	**Mandate**	How definitive can the SSDC be in offering planning confidence to schemes demonstrating adoption of the principles.	R: 'Developments should be supported if they meet the design code.' G: 'Developments that meet the design code have permission in principle.'	Should / Must.	Preference indicated for stronger mandate combined with a high-level of prescription.
1.4	**Interaction with London Plan**	'Best Practice' implementation of the London Plan policies.	R: Offer foundational principles and language for the preparation of additional, place-specific guidance. This would lighten language around more subjective policy areas, like character, to allow for flexibility at the local level. A: Recommend/sign-post the policy focus for LAs to develop at the local level, using the SSDC as the basis. G: Preparation an exhaustive and standalone 'default' design code - that takes a position on both objective and subjective considerations.	Could / Should / Must	To understand the intended strategic application of the SSDC: • Is the SSDC chiefly to signpost the policy focus at the local level? • A universal design code that sets the objective baseline principles to act as a policy foundation for LAs? • A design code that institutes both objective and subjective policy criteria - that may then be superseded at the local level or not. A combined approach could be taken by managing language for prescription level - see 1.1 .
1.5	**Interaction with Local Plans**	Balance universal adoption of design principles with flexibility for use as a foundation for locally-determined design codes and further small site guidance. Local Authorities should consider latent small site capacity in the development of their local plans.			

Schedule of Considerations

Schedule of Considerations					
#	**Consideration**	**Notes**	**Ambition**	**Prescription**	**Comments / Recommendations**
1.6	**Social Value Overlay**	Integration of a Cultural Intelligence (CQ) framework to review and monitor preparation of the Small Sites Design Code. Ensuring the SSDC encourages or mandates meaningful and appropriate forms of inclusivity - in both process and design outcomes.	G: Ensure all development considerations are reviewed against a CQ framework, both for scope and their potential outcomes.	Should/Must	To incorporate into processes.
2	**Strategic Principles**				
2.1	**Character**	To be tabled as a discussion point with key stakeholders. Ambition to re-instate the principle of character as an evolving state. Potential for small site development to not only reflect and amplify local character, but to contribute/generate new, positive character.	R: Design proposals to reflect and amplify contextual character, demonstrate understanding. A: Design proposals to contribute positively to local character through design-led responses. G: Acknowledgement of local character as an evolving quality, changing over time. Potential for small site development to generate character.	Could / Should - these principles should scope the ambitions and opportunities that drive the encouragement of small site development.	To understand ambition.
2.2	**Diverse Communities**	Capture the potential of small sites to meet diverse needs at local level - possibly widening guidance to accommodate different cultural modes of living (e.g - intergenerational families, etc).	G: Applying Cultural Intelligence to ensure that design is evidence-based and reflects user needs and lived experience- not just the perspective of the applicant.		The RIBA Inclusive Design Overlay to the Plan of Work provides the structural framework for this, integrating inclusive design principles through five essential team roles and defining the engagement of user groups throughout the design process to ensure co-creation.
2.3	**Local Economies**	Impact of increased density on local areas' ability to sustain social infrastructure. Capturing latent capacity potential on small sites to inform future identification of strategic growth areas,	To be explored with stakeholders to capture strategic priorities.		To explore inclusion.

Schedule of Considerations

Schedule of Considerations					
#	**Consideration**	**Notes**	**Ambition**	**Prescription**	**Comments / Recommendations**
2.4	**Participatory Processes**	Approaches to community engagement could take the form of a pre-determined but adaptable approach that is structured around finding the right questions to be asking. Emphasising early engagement, an evidence-based approach, and anticipating/minimising biases.	A: Define a 'best-practice' approach to engagement for small sites (scale-responsive). G: Mandate an approach to engagement for small sites(scale-responsive).	Could / Should - these principles should scope the ambitions and opportunities that drive the encouragement of small site development.	Offering a pre-defined process for small scale engagement practices can both mandate the incorporation of 'unheard voices' in the development of small sites, as well as giving to clarity to both applicants and developers by providing a baseline of expectation for inclusive practices at planning. We'd suggest a flow-chart methodology as a positive and question-led format for engagement. This should be adaptable to development scale and development type in order to incisively uncover 'pressure points' for each type of small site development - and at different scales.
2.5	**SME Developers**	Encouraging SME developer uptake of small site development.	R: Omit A: Acknowledge challenges G: Identify as a strategic priority		To explore inclusion.
3	**Universal Design Principles**				
3.1	**Height**	What design policies can be adapted to encourage small site development.	To be developed at site-specific level.	Should / Must - clear definition of universal principles, but retain some flexibility for site-specific responses.	Principles to be represented in diagram form for further, type-by-type discussion.
3.2	**Massing**		To be developed at site-specific level.		
3.3	**Site Optimisation**		A: Encourage responsible use of land in providing new homes, and prevent new development from precluding surrounding sites from optimisation.		
3.4	**Overlooking**		R: Deference to London Plan separation distance guidance. A: Statement to encourage design-led solutions and case-by-case appraisal. G: Condition-specific guidance - defining specific small-site configurations and relationships that allow for more permissive but specific separation distances.		
3.5	**Separation Distances**				
3.6	**Inclusive Design**		G: Expansion of consideration beyond physical access, explicitly codifying for sensory, cognitive, and hidden needs.		
3.7	**Internal Space Standards**		G: Permit departure from normative housing typologies (2b3p, 5b6p, etc...) in cases where an express need can be met, either at the level of the individual or the community, (e.g intergenerational living, etc.)		

Schedule of Considerations

Schedule of Considerations					
#	**Consideration**	**Notes**	**Ambition**	**Prescription**	**Comments / Recommendations**
3.8	**External Amenity Space**	What design policies can be adapted to encourage small site development.	R: Deference to London Plan guidance. G: Conditional guidance - e.g: lower or different requirements for sites close to high-quality public green space.	Should / Must - clear definition of universal principles, but retain some flexibility for site-specific responses.	Principles to be represented in diagram form for further, type-by-type discussion. Sustainability/circular economy ambition for small sites to be captured/explored.
3.9	**Car Parking Provision**		R: Deference to London Plan guidance. G: Conditional guidance - lower requirements on small sites - to reflect PTAL/SAM score, or trade-off with cycle provision.		
3.10	**Cycle Parking Provision**				
3.11	**Materials, Detailing and Character**		R: Materiality sympathetic to the existing. G: Explicitly permissive around material specification, providing designs are high-quality and solutions are design-led.		
3.12	**Access, Servicing, & Refuse Collection**		R: Deference to London Plan guidance.		
3.13	**Urban Greening Factor**		R: Deference to London Plan guidance.		
3.14	**Affordable Housing Contributions**		Recommendation language for local authorities? Borough's should be dissuaded from instituting affordable housing levies that diverge from the national requirement.		
4	**Site Specific Design Principles**				
	Infill				
4.1	**Side Street Infill**	Type-specific guidance adding further detail covering the below in response to specific site conditions: - Height - Massing - Optimisation - Overlooking - Separation Distances	Infill - aggressively encourage infill development.	Must - Ensuring interpretation is clear and mandated design responses are clearly scoped..	Draft principles to be represented in diagram form for further, type-by-type discussion.
4.2	**Street Extension**				
4.3	**Rear Street Development**				
4.4	**Residual Infill**				
4.5	**Backland**				
4.6	**Landlocked**				
4.7	**Street Infill**				
4.8	**Vacant Land**				
4.9	**Parking**				

Schedule of Considerations

Schedule of Considerations					
#	**Consideration**	**Notes**	**Ambition**	**Prescription**	**Comments / Recommendations**
	Intensification				
4.10	**Intensification**	Type-specific guidance adding further detail covering the below in response to specific site conditions: - Height - Massing - Optimisation - Overlooking - Separation Distances	A: Intensification - encourage incremental intensification. G: Capture the positive potential of intensification for potential to generate new and positive character. Capture the positive benefits of higher overall density, impact to local amenities.	Must - Ensuring interpretation is clear and mandated design responses are clearly scoped.	Social Value Considerations: - Engagement strategies should take into account difficulty of introducing pro-intensification policies within communities. - Encourage schemes to demonstrate consideration of how design outcomes have aligned the broader vision of thriving and vibrant communities.
4.11	**Corner Intensification**				
4.12	**Wedge**				
	Reconfiguration				
4.13	**Conversion**	Type-specific guidance adding further detail covering the below in response to specific site conditions: - Height - Massing - Optimisation - Overlooking - Separation Distances	R: Positive examples of extension to increase capacity within single-dwellings, without subdivision. A: Express acknowledgement for applicants to subdivide existing housing - explore limiting mechanism, such as no net loss of total bedrooms or an demonstration of need. G: Targeted guidance to encourage uptake of airspace development opportunities, including an explicit widening of defined acceptable characters, likely through precedents.	Must - Ensuring interpretation is clear and mandated design responses are clearly scoped.	Social Value Considerations: - Encouraging retrofit and refurbishment approaches to increase capacity. - Encourage adaptation of existing dwellings to meet specific needs and users.
4.14	**Extension**				
4.15	**Subdivision**				
4.16	**Airspace**				

Next Steps

Our Recommendations

The following actions are recommended to progress preparation of the SSDC and manage the evolving policy context.

Policy Exclusion Mapping - Apply strategic policy constraints including flood risk zones3 and open space designations to exclude these areas from capacity calculations.

Complete Data Intersections - Finalise London-wide intersection with Historic England Character Types and Draft SAM scores to enable policy scenario testing.

Policy Scenario Testing - Develop and test policy scenarios to unlock capacity potential under varying strategic conditions.

Stakeholder Engagement Programme - Conduct structured consultation with varied stakeholders to validate site type classifications and refine technical parameters for site-specific design codes.

Cultural Intelligence Framework - Work with Marsha Ramroop to meaningfully integrate a CQ framework throughout code development to ensure guidance supports inclusive outcomes and reflects diverse housing needs.

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