

Rebuttal to Use of 80m Depth Standard in Supplementary Guidance (Backland Development) (Page 4)

1. No Policy Basis for an 80m Minimum Depth Standard

The reference to an 80-metre site depth threshold as a justification for resisting backland development lacks any statutory or evidential foundation. Contrary to what is stated in the Council's Supplementary Guidance (Page 4), the 1998 London Planning Advisory Committee (LPAC) report, "Sustainable Residential Quality: New Approaches to Urban Living", did not introduce or endorse an 80m standard.

Instead, the document provided a purely illustrative diagram showing how two rows of houses *could* fit within an 80m deep site. This was never intended to be interpreted as a policy threshold or minimum site depth. Indeed, the diagram was explicitly contextual and demonstrative.

2. The LPAC 1998 Document Has Been Superseded

The 1998 SRQ guidance has been superseded multiple times by more recent and design-led frameworks including:

- The London Plan (2011, 2016, and 2021 versions)
- The Housing SPG (2016)
- The Optimising Site Capacity LPG (2021–23)

These updates shift the focus from rigid plot dimensions to a contextual and performance-based approach, prioritising:

- Optimisation of land within urban boundaries
- High-quality design
- Efficient use of brownfield sites
- Accessibility and transport links

There is no place in current best practice for arbitrary minimum depth standards that constrain density without regard to local character, access, or form.

3. Conflict with Current Housing Policy and Strategic Aims

The proposed reliance on a fixed 80m threshold is not only inaccurate and outdated, but it also undermines the Council's own strategic objectives:

- The Local Development Plan aims to accommodate 60% of future housing growth within existing settlements.
- There is a well-documented and severe housing need, both market and affordable, across the district.
- Planning should respond to this need by encouraging efficient, high-density infill where it is appropriate, not artificially restricting it.

An 80m standard misrepresents land use capacity, promotes underdevelopment, and contradicts the SPPS's aims to optimise the use of land, particularly in sustainable, serviced urban locations.

4. Land is a Finite Resource—Flexibility is Essential

Urban land is finite and increasingly scarce. Good planning requires flexibility and consideration of:

- Urban morphology
- Site access
- Surrounding character
- Residential amenity
- Sunlight/daylight impacts

A blanket dismissal of sites under 80m depth does not align with these principles and could inhibit the delivery of much-needed housing, particularly small-to-medium infill schemes that can enhance neighbourhood vitality.

Conclusion and Recommendation

The 80m site depth guideline:

- Has no formal policy basis
- Misinterprets outdated, illustrative guidance
- Conflicts with contemporary planning objectives for density, sustainability, and land optimisation
- Risks undermining efforts to address the current housing crisis

Recommendation: The Council should remove or revise this reference in the supplementary guidance. Instead, assessment of backland proposals should be based on design quality, site context, and residential amenity, not arbitrary dimensional thresholds.

Yours Sincerely,

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