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**City of London Local Plan  
City Plan 2040  
Proposed Submission Draft Explanatory  
Note**

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Queens Quay residential units

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## 1.0 Introduction

1.1 This paper expands on the City of London Housing Topic Paper produced in March 2024 and provides further explanation to support the housing policies in the Proposed Submission Draft City Plan 2040 and highlight where changes are proposed. During the Regulation 19 consultation carried out between April and June 2024 several comments were received on housing issues and it was considered that further explanation was warranted to provide greater clarity of the policy development process.

1.2 As set out in the Procedure Guide for Local Plan Examinations (paragraph 1.6), Local Planning Authorities (LPA) sometimes submit to the examination a list of proposed changes to the published plan that have not been the subject of consultation. The Inspector will not treat those proposed changes as part of the plan to be examined. However, the Inspector may consider it appropriate for some or all of the LPA's proposed changes to be discussed at the hearing sessions, and in appropriate circumstances they may form the basis for Main Modifications.

1.3 In the context of paragraph 1.6 of the Guide, the City Corporation will submit to the examination a list of proposed changes to the published plan. While the City Corporation does not believe Main Modifications to be required at this stage to make the plan sound, these changes are being proposed in the spirit of ongoing collaboration with stakeholders and to inform discussions at the hearing sessions. Should the Inspectors consider it appropriate, the City Corporation would welcome the opportunity for these to be discussed at the hearing sessions, and (in appropriate circumstances) for these to form the basis of Main Modifications, should the Inspectors consider Main Modifications necessary. This explanatory note makes reference to areas of the plan where the City Corporation will propose changes, in line with the approach set out in paragraph 1.6 of the Procedure Guide.

1.4 The City Corporation have carefully considered all the responses and concluded that the plan remains sound. However, there are some cases where the City Corporation intends to submit proposed changes to the plan (as set out in the introduction to this note).

1.5 The complete list of representations received, and the City Corporation's response, is found within the Consultation Statement (2024). A list of proposed changes will be submitted to the examination shortly.

## 2.0 Context

2.1 During the Regulation 19 consultation, comments were received from the respondents below. Based on their concerns, it was felt that further explanation of the housing policies in the Plan was warranted and hence it was decided to produce this explanatory note.

- **Greater London Authority-** (R0292)

Requires clarity on housing target timescales and housing shortfall (if any), from the London Plan Target. Needs additional detail added on affordable housing to ensure that the City Plan is aligned with the London Plan.

- **Homebuilders Federation** (R0103)

Approach to housing targets unsound and inconsistent with the London Plan, questioning the completions data within the plan and topic paper. Greater clarity and background requested in relation to approach to infrastructure, vacant building credit and older persons housing.

- **Barbican and Golden Lane Neighbourhood Forum** (R0218)

Suggests need dedicated policy for the Barbican, comments relating to protection of residential amenity from other uses, noise and air quality issues, concerns about the impacts of the heat island effect on existing residential communities.

- **Unite** (R0188)

Commentary on the appropriateness of cycle parking standards for student housing. Suggests M4 building regulations should not be applied to student accommodation. Considers that student accommodation contributes towards housing need so should be reflected as such within the definition of housing. Provision of new housing should be an additional consideration at the first stage of assessment within Policy OF2 Protection of Existing Office Floorspace.

## 3.0 NPPF Para 69

3.1 The National Planning Policy Framework (NPPF) requires local planning authorities to maintain a 5-year supply of specific deliverable housing sites to demonstrate that sufficient housing will come forward through allocated and windfall sites to meet projected need. The NPPF sets out a standardised approach to assessing housing need and requires strategic planning authorities to follow this approach in setting housing targets in Local Plans.

Paragraph 69 of the NPPF requires authorities to identify a supply of:

- a) specific, deliverable sites for five years following the intended date of adoption;
- b) specific, developable sites or broad locations for growth, for the subsequent years 6-10 and, where possible, for years 11-15 of the remaining plan period

3.2 The City Corporation has traditionally relied on windfall sites to meet its housing targets due to the small size of the City and the predominance of the internationally important business and financial sector. Along with an anticipated supply of windfall development on small sites, three of the identified Key Areas of Change in the Plan (Fleet Street, Smithfield and Barbican and Aldgate, Tower and Portsoken) are expected to deliver additional housing in line with policies encouraging mixed-use as well as residential development.

## 4.0 Housing delivery in the first 5 years

4.1 The NPPF advises that specific deliverable sites should be identified for the 5-year period following the intended date of adoption of the Plan. This 5-year period would be between 2025/26 to 2029/30 for the City. Years 6-10 should demonstrate specific developable sites.

4.2 The NPPF defines windfall sites as “sites not specifically identified in the development Plan”. Paragraph 70 of the NPPF encourages local authorities to support the development of windfall sites through their policies and decisions, as they can make an important contribution to meeting the housing requirements of an area.

4.3 As the City Corporation does not have site allocations, a different approach is required to demonstrate delivery against the 5-year housing requirement, in particular years 4 and 5. Table 1 below demonstrates anticipated delivery for years 1 to 3 based on extant permissions, however due to the length of permissions and an absence of allocations, there is no data which can be included for years 4 and 5. However this does not present a realistic picture of housing delivery within the City.

4.4 At the time of writing, there are 579 units under construction in the City and these are anticipated to be delivered in years 2-3 of the plan. Given build-out

rates, we anticipate that delivery on sites for years 4 and 5 are likely to be from sites which are early in the planning process, or from schemes which currently have permission (and will not lapse in next 2 years) and will be under construction within 2 years.

4.5 At the time of writing there are approximately 786 student housing and co-living units being considered under the pre-application process. There are two schemes awaiting consideration by committee by the end of 2024 which, if approved, would provide 442 units and two schemes at an earlier stage of the planning process which, if granted permission would deliver 344 units. Due to their pre-app status, it has been assumed it would be reasonable to count 60% of the total units and apply the ratios for student and co-living housing. This would result in a conservative estimate of 210 units being delivered for years 4 and 5 (which is 105 per annum).

4.6 Therefore, the City Corporation is proposing to include those schemes in the pipeline in the housing trajectory permissions within years 1 to 3 and a proportion of sites/schemes currently in the decision-making process for years 4 and 5.

Source of units	Year 1 2025/26	Year 2 2026/27	Year 3 2027/28	Year 4 2028/29	Year 5 2029/30
<b>Pipeline</b>					
Student Housing Citicape House u/c 21/00781/FULMAJ		267			
Student Housing Friary Court u/c 22/00882/FULMAJ			312		
4-7 Lombard Lane pnc 20/00723/FULL	2				
Cromwell Tower pnc 22/00177/FULL	1				
43 Golden Lane pnc 20/00716/FULL	1				
Middle Temple pnc 23/00529/FULL	1				
178 Bishopsgate pnc 22/00414/FULL	2				
118 Middlesex St pnc 23/00899/FULL	4				
22-24 Red Lion Court pnc 22/00141/FULL	9				
Middle Temple pnc 23/01067/FULL	1				
122 Minorities pnc 22/00035/FULMAJ		17			
<b>Pre-apps – with ratios applied</b>				105	105
<b>Total</b>	21	284	312	105	105
<b>GLA target</b>	146	146	146	146	102

*Table 1 - Anticipated housing delivery in first 5 years of plan*

## 5.0 Estimated Windfall Delivery (years 6 onwards)

5.1 Windfall sites are defined in the NPPF glossary as those sites which are not specifically identified in the development Plan. Paragraph 72 of the NPPF states that where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends.

5.2 Housing delivery in the City follows a pattern of a relatively consistent delivery on small housing sites (those with under 10 units) combined with a highly variable level of delivery on a few larger sites, which come forward in response to development opportunities and favourable market conditions. There has been an increasing trend in recent years of different housing products being developed such as student housing and co-living accommodation, which using the nationally set ratios, count towards achieving the City's housing targets.

5.3 The small sites minimum targets in the London Plan are informed by the 2017 London SHLAA and show the potential capacity for additional housing on sites of less than 0.25 hectares in size. The targets are based on trends in housing completions on sites of this size and the estimated capacity for net additional housing supply from intensification in existing residential areas, taking into account PTAL, proximity to stations and town centres, and heritage constraints. The City's small sites target is 74 units per annum, which is based on an 8-year trend between 2008 and 2015. The London Plan states that the small sites target can be taken to amount to a reliable source of windfall sites which contributes to anticipated supply.

5.4 As local plans for the City have never included site allocations for housing, all housing delivery has been a form of windfall development. Therefore, in order to gain a more robust understanding of the potential amount of windfall development that may come forward within the Square Mile over the life of the Plan, a series of scenario tests have been conducted to arrive at a reasoned figure which can be entered into the housing trajectory model, including sites under and over 0.25 hectares.



Year	Scenario 1: 5 year period	Scenario 2: 10 year period	Scenario 3: 15 year period
2009/2010	n/a	n/a	45
2010/2011	n/a	n/a	132
2011/2012	n/a	n/a	18
2012/2013	n/a	n/a	51
2013/2014	n/a	n/a	458
2014/2015	n/a	277	277
2015/2016	n/a	89	89
2016/2017	n/a	12	12
2017/2018	n/a	153	153
2018/2019	n/a	62	62
2019/2020	296	296	296
2020/2021	202	202	202
2021/2022	433	433	433
2022/2023	96	96	96
2023/2024	0	0	0
<b>Total average</b>	<b>1027/5 = 205</b>	<b>1620/10 = 162</b>	<b>2324/15 = 156</b>

*Table 2 -Residential completions per year*

5.5 It is anticipated that windfalls will continue to deliver sufficient housing to meet the housing requirement in the City Plan. However, based on the analysis of past windfall trends and uncertain economic cycles, it is considered that a deliverable and achievable figure would be 120 units per annum over years 6 onwards, which has been included within the housing trajectory. This is a cautious assumption which builds in contingency for applications not progressing and changes in the property market.

## 6.0 Capacity

6.1 The City Corporation’s housing target for the period 2019/20 to 2028/29 comes directly from the London Plan 2021, which is derived from the 2017 Strategic Housing Land Assessment (SHLAA). The City Corporation worked alongside the GLA in the preparation of the SHLAA to establish the capacity, availability, deliverability and suitability of sites for housing over the London Plan period to 2041.

6.2 The ten-year London Plan target therefore consists of the large site capacity within phases 2 and 3 of the 2017 GLA SHLAA rounded down (to 520) plus the small sites (740) and non-self-contained assumptions (200), equalling 1,460 (146 per annum) for the ten year period. The methodology behind the small sites’ assumption is set out in the SHLAA, and for the City of London this is based on an annual 8 year (2008-2015) average trend (see paragraph 9.9 of the SHLAA).



	2017/18- 2018/19	2019/20- 2023/24	24/25- 28/29	2029/30 – 2033/34	2034/35- 2040/41	Total
	Phase 1	Phase 2	Phase 3	Phase 4	Phase 5	
City of London	479	219	308	204	35	1245

*Table 3- Large site capacity by local planning authority and phase (2017 to 2041)*

6.3 The housing target of 1,706 as set out in Policy S3 (1) therefore draws on the London Plan target to 2028/29 and then utilises the standard method of 102 per annum (using the methodology at time of Publication in 2023 NPPF) (see section 5 above).

6.4 The London Plan at paragraph 4.1.11 states that *“If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites”*.

6.5 Further analysis of the 2017 SHLAA sites is therefore set out below to determine the extent of remaining large site capacity over the plan period.

Site	Capacity	Delivery timescales	Site type	Actual outcomes at July 2024	Remaining capacity
1	41	Phase 1	Approval	41 Completed	0
2	87	Phase 1	Approval	87 Completed	0
3	236 (177/59)	Phase 1/2	Approval	231 Completed	0
4	9	Phase 1	Approval	9 Completed	0
5	160	Phase 2	Approval	160 Completed	0
6	165	Phase 1	Approval	165 Completed	0
7	14 (4/5/5)	Phase 3/4/5	Low probability	U/C for other uses	0

8	5	Phase 5	Low probability	Currently in use	0
9	60 (30/30)	Phase 3/4	Low probability	Currently in use	0
10	25	Phase 5	Low probability	Currently in use	0
11	104	Phase 3	Potential development	99 Completed	0
12	170	Phase 4	Potential development	Application withdrawn	170
Total					170

*Table 4 - Large site capacity updates*

6.6 This identified that there is a remaining theoretical capacity from one of the large sites with a capacity of 170. Unsurprisingly, none of the low probability sites have come forward, and are currently in active use, and are therefore not considered likely to be redeveloped for residential use. Half are not considered to be near or adjacent to residential areas so would not be expected to yield conventional supply.

6.7 Reconsideration of these sites in 2024 therefore suggests a remaining capacity from large sites of approximately 170. Moving this forward to the latter parts of the plan period (2029/30- 2039/40) and roll over of the small sites assumption (814 over 11 years) would suggest capacity of 984 for the remainder of the plan period. This capacity has been included in years 14 and 15 within the housing trajectory.

6.8 This is below the figure for the standard method (of 102), however Policy S3 (1) (a) seeks to boost supply setting out that the target would be ‘a minimum’ of 1,706. Although the approach is consistent with the NPPF and uses the standard methodology, if it is considered helpful the City Corporation is willing to discuss, during the course of the examination hearings the potential for amendments to paragraph 4.1.8 to more accurately reflect the wording of the London Plan at Policy H1 and responds to comments to this effect from the Mayor of London.

6.9 The City Corporation will propose this change, as follows, during the examination:

*4.1.8.... Beyond 2028/29, the London Plan requires boroughs and the City to draw on the capacity work which underpins the London Plan's target and any local evidence of capacity, as well as rolling forward London Plan small sites estimates, when setting longer term targets. Analysis of the remaining capacity from the 2017 SHLAA suggests the target of 102 per annum to remain appropriate as a minimum. However, the City Corporation will work in collaboration with the Mayor of London in the preparation of the new digital SHLAA for the upcoming London Plan to identify additional capacity, the outputs of which will be used to inform targets in the period post 2028/29.*

6.10 It is noted that at the time of writing the new Government has released a consultation on the NPPF which included a new methodology for calculating housing need. Initial calculations suggest (if undertaken today) this has the City Corporation at 151 units per annum. However, it also recognises that the housing targets where there is a SDS (i.e. London Plan) in place should come from this document. Therefore, given that this is a consultation at this point and the City Plan will proceed under the 2023 NPPF it is not proposed to make any amendments at this stage. As above the housing targets on the emerging London Plan will apply in due course.

## 7.0 Housing Trajectory

7.1 The NPPF requires strategic policies to include a trajectory illustrating the expected rate of housing delivery over the plan period. All plans should consider whether it is appropriate to set out the anticipated rate of development for specific sites. The housing trajectory demonstrates that the City is meeting its housing targets in the first 5-year period of housing delivery and will be meeting the required targets up to 2039/40.

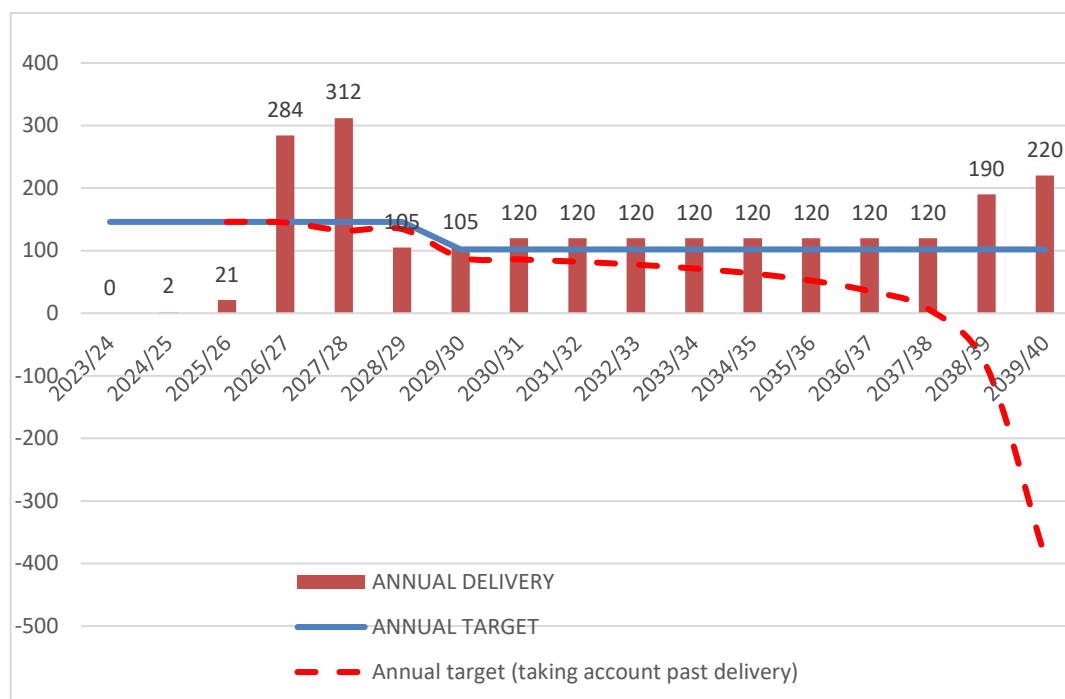


Figure 1 – Housing trajectory

7.2 Table 5 below demonstrates that over the London Plan period the City Corporation will over provide 212 residential units, therefore no deficit needs to be included in the analysis.

Year	London Plan Target	Completions/anticipated completions	+/- target
2018/19 completions	141	62	-79
2019/20 completions	146	296	+150
2020/21 completions	146	202	+56
2021/22 completions	146	433	+287
2022/23 completions	146	96	-50
2023/24 completions	146	0	-146
2024/25 pipeline	146	2	-144
2025/26 pipeline	146	21	-125
2026/27 pipeline	146	284	+138
2027/28 pipeline	146	312	+166
2028/29 pipeline	146	105	- 41
<b>Total</b>	<b>1,601</b>	<b>1,813</b>	<b>+212</b>

Table 5- Completions and anticipated completions over London Plan period

## 8.0 Tenure split

8.1 The GLA have submitted a comment in response to the City of London Regulation 19 Consultation querying the lack of a defined tenure split in Policy HS3. The policy explains that because the City's SHMA found that the need for intermediate housing products was relatively low, the tenure of affordable housing will therefore need to be determined on a site-by-site basis, having regard to evidence of need in the City Plan.

8.2 The current adopted 2015 Local Plan Policy CS21 requires residential developments of 10 or more units to provide 60% of affordable units as social/affordable rented housing and 40% as intermediate housing, including key worker housing. Following the adoption of the Local Plan in 2015, it became apparent that intermediate housing was not the best tenure model for the particular requirements of people on the City's housing register. Housing colleagues have prioritised social rented housing using S106 receipts to develop units outside the City, where there are opportunities to collaborate with neighbouring Local Authorities and enable more housing than would be possible in the City, due to high development costs. (See Table 9).

8.3 The London Plan indicates that a minimum of 30% should be low cost rented homes, including social rent and London affordable rent, and a minimum of 30% should be intermediate products, such as shared ownership. The remaining 40% should be determined by the relevant borough based on identified need, which could include First Homes.

8.4 The City's SHMA found that as the need for intermediate housing products was relatively low, social rented units would most successfully address the City's affordable housing needs. However, the Plan recognises that different forms of affordable housing are being developed and the viability and suitability of particular tenures is likely to change over the Plan period.

8.5 Following the Regulation 19 consultation process it was considered that the SHMA could be strengthened with additional information in relation to the breakdown of housing need. The City of London Corporation therefore commissioned additional work to supplement its Strategic Housing Market Assessment (2023) in relation to affordable housing tenure requirements.

8.6 ORS consultants were engaged to analyse the affordability of renting in the City for people identified as in housing need in the SHMA and concluded that the majority of the total tenure need is for other affordable rented products, which in the City of London are typically London Social Rent. This would pick

up the needs of households with an income of less than £50,000, with many requiring housing benefit support to pay their rents. ORS stated at para 3.9 “On this basis, a potential policy response to the affordable needs would be to seek a 90:10 split between affordable rented and London Living Rent for affordable housing on qualifying sites. However, it is noted that such a split on small sites such as that that come forward within the Square Mile may be inappropriate or unachievable due to site specific circumstances, or management arrangements”. The City Corporation acknowledges that a 90/10 split may not always be practicable due to management arrangements for different tenures, however the evidence within the SHMA and its supplement is considered appropriate as a starting point for the case-by-case consideration of the most appropriate affordable housing tenure split.

8.7 To reflect this additional update the City Corporation is open to the consideration of additional wording to the supporting text during the course of the examination, such as that set out below:

4.2.15.... *“Both the ~~The~~ City’s SHMA (2023) and SHMA Supplement (2024) found that the need for intermediate housing products was relatively low at around 12% of the need for affordable housing. Therefore, given the scale and nature of developments within the square mile, it is considered ~~and~~ that social rented units ~~would~~ will often most successfully address the City’s affordable housing needs. However, different and innovative forms of affordable housing are being developed and the viability and suitability of particular tenures is likely to change over the Plan period. The tenure of affordable housing will therefore need to be determined on a site-by-site basis, having regard to evidence of need (as set out in the SHMA and its Supplement) in the City and London Plan requirements.”*

8.8 A viability assessment of the Draft City Plan 2040 was undertaken by BNP Paribas for the City Corporation in November 2023. The assessment appraised residential schemes with a range of affordable housing from 0% to 50% to test the ability of development typologies to meet the requirements of Policy S3 which requires 50% affordable housing on publicly owned sites and 35% on other sites with more than 10 units. The tenure mix of the affordable housing also has a bearing on viability. For testing purposes only, BNP assumed a tenure mix of 70% London Affordable rent and 30% shared ownership.

8.9 In response to the GLA’s comment BNP Paribas subsequently tested the viability of schemes in the City with a tenure split of 60% social rent/40% London Living Rent as well as schemes providing 100% affordable housing. This concluded that at lower value points the ability to meet the 35%/50%

affordable housing becomes more challenging but using typologies from across the City at the higher value points 35% is still achievable for 100% social rented. In accordance with policy a full viability appraisal would be required where a policy compliant mix is not being achieved. In these circumstances, it is considered that the policy contains sufficient flexibility, both in terms of tenure mix and overall quantum, to enable schemes to come forward with a viable package of affordable housing.

## 9.0 Older persons housing

9.1 The National Home Builders Federation (HBF) submitted a comment in response to the City of London Regulation 19 Consultation querying the figure for older persons housing in Policy HS7. The policy, in part 2 “seeks to provide a minimum of 86 net additional dwellings for older persons between 2023 and 2040”. This figure is derived from the City of London Strategic Housing Market Assessment (SHMA) (Table 20 of the SHMA), which covered the period 2021 to 2043 (see extract replicated below).

Population 75+ (2021)	Population 75+ (2043)	Change in population aged 75+	Specialist housing need (170 units per 1000) 2021-43
686	1189	503	86

Source- ONS- Subregional population projections 2018-43

*Table 6 - Projected need for specialist housing for older people (2021-2043)*

9.2 Table 6 shows the projected change in the population aged 75 and over in the City of London and the implication for the provision of specialist accommodation based upon the suggestion of 170 housing units per 1,000 population. This represents a potential need for 86 additional units across the timeframe – about 4 per year. This specialist housing for older persons would include both sheltered and extra-care units.

9.3 The HBF consider the figure of 86 to be too low and that the figure of 10 per annum derived through the GLA SHMA should be used. The reasoning given is that housing need is approached by the GLA as a pan-London issue and therefore the City Corporation should maximise the amount of potential housing units for older persons, to fulfil the need across London. HBF suggest that this amendment to HS7 would bring the policy into line with the aims of Policy H13 of the London Plan.



9.4 The London Plan 2021 recognises that London’s ageing population will require additional residential units to cater for older persons specific requirements. The City has an ageing resident population profile, in line with national demographic trends. Some people will wish to remain in their own homes, with suitable adaptations, or may choose to move into specialist housing which caters for the needs of older people, with varying degrees of support. Policy D7 requires 10% of new residential development to be wheelchair accessible and the remaining accommodation to be capable of adaptation for people with disabilities. The CityPlan 2040 complies with London Plan policy.

9.5 Barbican and Golden Lane Neighbourhood Forum submitted evidence with their representation that shows that the 75+ population of the Neighbourhood is projected to increase by 482 individuals to reach a total of around 877 in 2040. This is a 122% increase, doubling the share of the population in this age group.

9.6 The table below sets out the differing time periods relevant to assessing older persons housing benchmarks. The London Plan does not set targets for older persons housing but provides indicative benchmarks which are designed to inform local level assessments of need.

Source	Time period	Older person housing units	Units per annum
City of London 2023 SHMA	2021 – 2043 22 – year period	86	4
London Plan 2021	2017 – 2029 12 - year period	120	10
Older persons housed in neighbouring boroughs	2015-2025 10 - period	107	10

***Table 7- Older person housing timeframes***

9.7 Due to the unique nature and size of the City, no older person’s housing has been delivered over the period from 2017 onwards. Instead, as indicated in Table 7 above, the City Corporation has typically housed 10 households per annum in dedicated older persons housing outside the Square Mile.

9.8 The City is a heavily developed area with intense pressure from competing land uses, which means developing specialised housing is expensive. Policies in the Plan would be favourable to any proposed schemes for older persons

housing in the City. Existing housing stock in the City is largely suitable for older people to remain in their own homes, with approximately 98% of stock being flatted accommodation, a substantial amount of which has level access.

9.9 The London Plan considers London to be a single housing market area, which allows development in the most suitable location. While there has been no older person’s housing developed in the City since 2000, the City Corporation provides considerable numbers of housing units in London, a proportion of which are made available to older persons requiring specialised housing on the City’s housing register.

## 10.0 Co-living and student housing

10.1 The London Plan encourages the provision of non-self-contained accommodation in the form of student housing (PBSA) and large scale purpose-built shared living accommodation (LSPBSL) which includes co-living, to meet the differing housing needs of London’s communities. A ratio has been devised that counts 2.5 student rooms as 1 residential unit and 1.8 co-living units as 1 residential unit towards local authority housing targets. The table below shows that student and co-living housing make a substantial contribution to meeting the City’s housing targets.

Site	Type	Status	Ratio applied
Emperor House 35 Vine Street	Student housing	Completed 2021/2022	248 units
Citicape House 61-65 Holborn Viaduct	Student housing	Under construction 2023 onwards	267 units
Friary Court 65 Crutched Friars	Student housing	Under construction 2023 onwards	312 units

*Table 8 -Student and Co-living housing*

10.2 Unite student housing providers commented that student housing should be considered in the same way as C3 housing and that it contributes to the City in a positive manner. Unite maintain that purpose-built student housing is recognised in national policy as a contributor towards housing supply and that “it may be appropriate in different locations to other forms of housing”. Unite contend, for the reasons given above, that PBSA should be treated in the same manner as other forms of housing. Unite note that this would not preclude an acknowledgement that PBSA may also be appropriate in other areas where different types of housing may not be appropriate. It is considered that it is not appropriate to allow student housing to be considered as C3 housing due to the

potential for amenity issues to arise and the need to manage different housing tenures within the context of the Plan as a whole.

10.3 There were several other comments, seeking a strengthening of policy on co-living and the inclusion of a separate co-living policy. It is considered that policy in the Plan is sufficient in its encouragement of co-living development and recognition of its role in the City’s housing market, in line with London Plan policy.

## 11.0 Housing provision outside the City

11.1 Housing delivery by the City Corporation enables both market and affordable housing outside the City, mostly in neighbouring boroughs. This includes over 1,800 social housing units on 11 estates that it owns and manages outside of the City of London in the six London boroughs of Southwark, Islington, Lewisham, Lambeth, Hackney and Tower Hamlets and over 900 leaseholder properties across London.

11.2 Since 2015 the Corporation has enabled 332 additional residential units to be developed using S106 monies as shown in Table 9 below. Where homes are developed outside the City, the City Corporation normally seeks joint nomination rights with the host borough to ensure that the housing can meet both City and host borough housing need.

Status	Year	Location	Units
Completed	2015	Tower Hamlets - Dron House	1
Completed	2015	Southwark - Horace Jones House	43
Completed	2016	Southwark - Twelve Acres	18
Completed	2023	Islington - Isledon	3
Completed	2023	Islington - COLPAI	66
Under construction	2025	Islington - York Way	91
Under construction	2025	Lewisham - Sydenham Hill	110
<b>Total</b>			<b>332</b>

*Table 9 - Housing development outside the City since 2015*

11.3 Table 9 demonstrates that housing enabled outside the City contributes to meeting London’s overall housing need and allows people on the City’s waiting list to be housed.

## 12.0 Conclusion

12.1 The City Plan 2040 is considered to be sound in respect of its housing policy. The data on past windfall trends, housing units in the pipeline and applications known to be coming forward demonstrates that there is a sufficient supply of housing to meet the required housing targets and contribute to meeting London's housing needs.