

Embargoed until 06:00 Friday 29 January 2016

Up or Out: A false choice

Options for London's growth

January 2016



Planning Committee Members

Nicky Gavron (Chair)	Labour
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Role of the Planning Committee

The Mayor of London has a significant strategic role in planning the future shape of London – publishing the London Plan and shaping and influencing the largest scale developments in the city. The Planning Committee’s role is to scrutinise the detail of the London Plan and the Mayor’s use of planning powers.

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Chair's foreword



It is a measure of London's success that its population is increasing rapidly. Last year the population exceeded its previous peak of 8.6 million, a size not seen since 1939. Projections, based on the 2011 Census, indicate that London is on course to grow to 10 million by 2031, the equivalent of adding a city the size of Birmingham. Now projections are showing that London's population will reach 11 million people by 2039.

Accommodating population growth on that scale is a major challenge. It is not just where we build the 50,000 new homes needed every year: it is also how we improve and expand public transport; where we locate businesses, schools, hospitals, shops; how we protect our open spaces and improve the quality of London's environment.

The question, in short, is how should London grow?

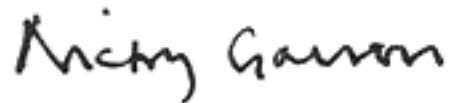
The current answer is the compact city approach. A feature of all London Plans since 2000, this approach accommodates London's growth within the existing boundaries, without paving over our green and open spaces. It requires higher density (though not necessarily high rise), mixed-use mixed-income development to be located near well connected transport nodes and town centres to improve access to jobs and services. This allows London to accommodate population growth within sustainable patterns of development, whilst regenerating existing communities. Large numbers of people can sustain schools, local shops and other facilities in a way that a more dispersed community cannot.

The report looks at ways to continue and extend the compact city approach, such as increasing the density of some parts of the suburbs, regenerating estates, and building new and expanded towns on brownfield land within the capital's boundaries.

Nothing is off the table in this report. We also consider different approaches, such as building new and expanded towns outside of Greater London. We question whether the growth of London can be accommodated whilst maintaining the quality of life that is at the root of London's attraction.

These are the central issues which will have to be addressed by the next Mayor's new London Plan. This report should be read as a menu of options for that Mayor. Not all of the options are viable or sustainable, but they all deserved consideration.

Tough decisions will need to be made.

A handwritten signature in black ink that reads "Nicky Gavron". The signature is written in a cursive, slightly slanted style.

Nicky Gavron AM
Chair of the Planning Committee

Executive summary

This report looks at where London's housing and infrastructure growth might take place and how it can be balanced with ensuring a high quality of life for all residents.

In 2016, London will have a new Mayor who will be a central player in determining how the capital will grow - and where the expected one million new Londoners will live in the coming ten years.

Should the new Mayor continue with the policy of containing growth within London's boundaries as supported by all previous Mayors – or are there new policy approaches that should be considered?

The Planning Committee is leading the debate about London's growth and this report sets out the agenda, identifies policy areas that need reviewing and challenges prospective Mayoral candidates to respond to the issues raised.

To assist this debate the report identifies where housing might be built (sites and locations) and how density can be increased sustainably through innovative design approaches. It specifically focusses on three aspects:

- Whether the “compact-city” approach can deliver the homes needed without jeopardising sustainability, particularly in Inner London;
- How density can be increased through different typologies and whether tall buildings contribute to meeting housing need; and,
- How areas in suburban London and around London's boundaries might contribute more homes.

Continuing to accommodate growth within the city's boundaries will mean London's population density will inevitably increase to levels that are double those of Paris, Rome or Berlin.

This can be delivered, but only if there is enough space to provide the supporting infrastructure like community facilities and open space. With sites for new development limited, especially in Inner London, the new Mayor will face a real challenge to ensure increasing residential densities are truly sustainable.

The potential of London's brownfield sites and Opportunity Areas need to be maximised through co-ordinated action to push the required infrastructure

through alongside housing development. The new Mayor must not neglect the local communities, whose involvement is crucial in developing plans that are positively welcomed rather than feared.

London's housing estates have huge potential as sites for new homes, either through comprehensive redevelopment or by smaller scale infill schemes that are less disruptive for residents. But again, to realise the potential residents must understand the purpose, process and outcomes of these proposals and have confidence in the plans from the outset if such schemes are to be successful.

The new Mayor needs to continue to prioritise family homes for London. If these homes are provided at high densities, then they must be of the high quality design and provide adequate space internally and externally. Increasing housing density does not have to mean high rise and there are numerous examples of projects that have delivered high density family housing with levels of amenity provided by traditional street pattern homes.

London is seeing an explosion of tall buildings, but these are not an answer to London's housing need, and as such should not be encouraged beyond a few designated and carefully managed areas. The new Mayor needs to ensure planning policy is strengthened to restrict the location of skyscrapers and improve their design.

In the longer term, as sites in central and inner London are built out the new Mayor needs to turn their attention to the suburbs that cover around 80 per cent of the capital's land area.

The intensification of density in suburban London has already begun. But, given the scale and potential contribution of suburban London, the new Mayor must continue efforts to resolve the challenge of suburban redevelopment. This is especially true if green space and Green Belt are not considered for development.

Addressing London's housing shortage will be the new Mayor's immediate priority but should not restrict long-term thinking. When the brownfield reservoir has dried up and the Opportunity Areas built out, when the intensification of town centres and the suburbs proves challenging, then accommodating growth outside London will be the last remaining option.

Dialogue with the rest of the south east is vital if London's growth can be accommodated and to do so will require establishing effective regional co-operation on new housing. The new Mayor will do well to start this dialogue sooner, rather than later.

Finally, the new Mayor may be called upon to rethink the role of London's Green Belt, and there is a good case to revise Green Belt functions to reflect London's 21st Century strategic priorities. By performing a new range of strategic functions (such as contributing to climate change mitigation objectives) it may be easier to justify its retention in the face of continuing housing pressure.

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1. Introduction

- 1.1 London's new Mayor is going to have to make decisions on how to manage the long-term growth of the city they are responsible for. London is expected to grow by a further million citizens over the coming ten years; it may possibly grow by another half a million in the decade after that.
- 1.2 The way London's growth will be managed, and the strategic direction it will take, will be set out in the next London Plan. The London Plan represents an integrated framework for the development of London over the next 20 to 25 years and it is likely that the next Mayor will want to review the policies for shaping the city's growth.
- 1.3 The next Mayoral election will take place in May 2016 and a new Mayor will be elected from a list of candidates that have yet to publish their detailed policies for accommodating and managing London's future growth. This report identifies some of the options they may want to consider and sets out the challenges for the Mayoral hopefuls over the entire life-span of the London Plan, from the next few years and towards the year 2050.
- 1.4 This report looks at where London's growth might take place and how it can be managed. Should the new Mayor continue with the policy of containing growth within London's boundaries as supported by all previous Mayors – or should new policy approaches be adopted?
- 1.5 The report is based on issues discussed across a number of meetings we held in the year 2014/15 on the issue of housing in London, specifically:
 - Density of housing development (February 2014).
 - Tall buildings and London's skyline (June 2014).
 - Options for accommodating London's growth (January 2015).
 - Design approaches to new housing development (March 2015).
 - Estate regeneration (September 2015).
- 1.6 It also draws on other related work such as the Assembly's response to the Infrastructure Plan, recent London Plan revisions as well as work on Opportunity Areas and Mayoral Development Corporations.
- 1.7 The report covers a range of options for accommodating London's growth in the short, medium and long term. The views of a considerable number of experts are contained in this report, and the Planning Committee does not

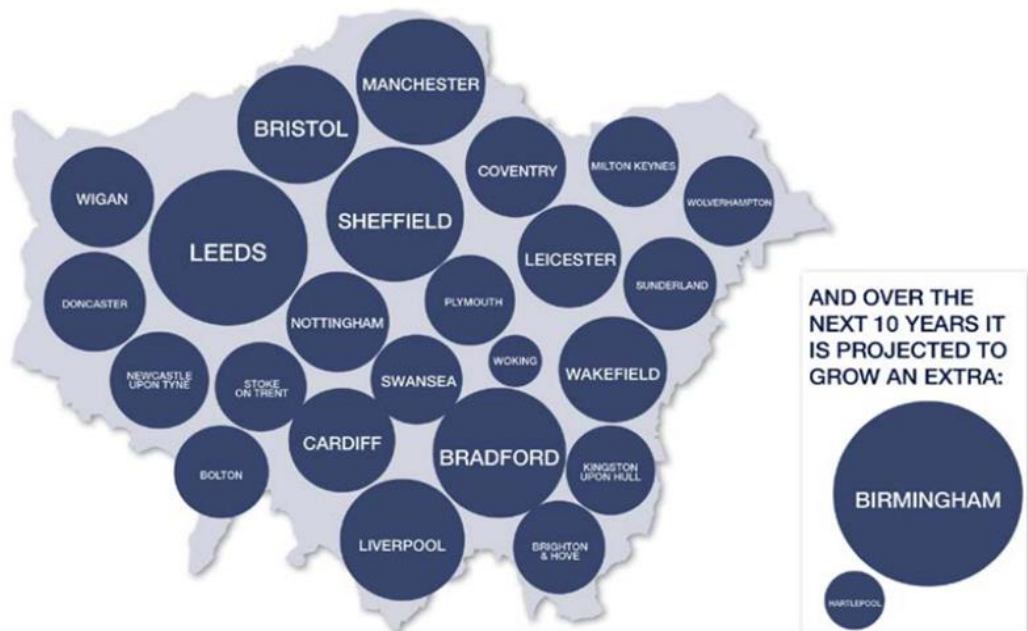
necessarily agree with all of them, but nevertheless their views are part of the debate. Some of the experts are thinking the unthinkable and, as the timescale increases, the approaches advocated by some become increasingly controversial.

- 1.8 The Planning Committee wants to encourage a debate about London's growth and this report tries to sketch out an agenda, identify potential policy areas that need reviewing and challenge prospective Mayoral candidates to respond to the issues raised.
- 1.9 A list of questions we are posing to the new Mayor, in terms of shaping London's future growth, is set out in Appendix 1 of this report.

2. Accommodating London's growth and increasing housing density

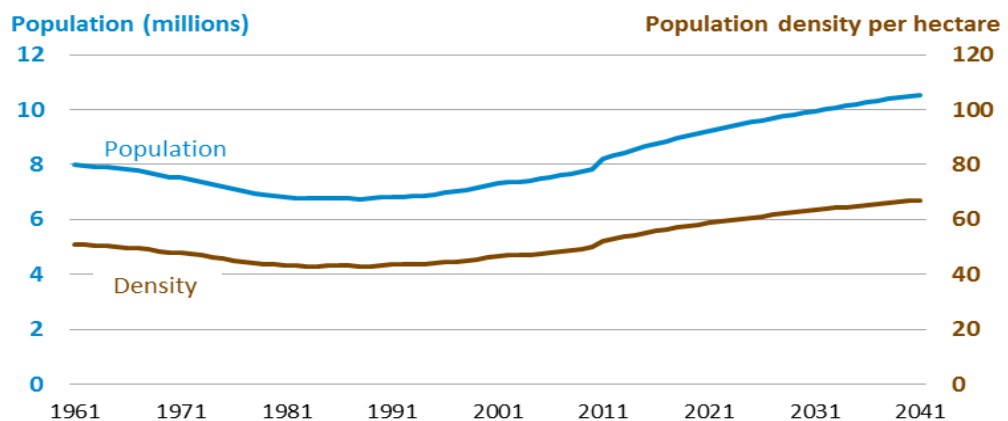
- 2.1 London's overriding priority is housing. The shortage and affordability of new homes will feature at the top of the next Mayor's policy agenda and will likely dominate the election.
- 2.2 London is expected to grow by a further million people over the coming ten years and is predicted to grow by a further 500,000 in the decade after that. The implications of this growth on the demand for new housing are significant.
- 2.3 London will require between approximately 49,000 (2015-2036) and 62,000 (2015-2026) more homes a year¹. But London only has capacity for 42,000 additional homes per annum (2015-2025).² And its ability to meet this demand is limited by a number of factors.
- 2.4 The overall thrust of the London Plan seeks to accommodate growth within London's boundaries without encroaching on open space or the Green Belt.³ To maintain this approach, the current Mayor has decided to adopt a harder line on density and wants to deliver additional housing (beyond the 42,000 target) by increasing densities in the Opportunity Areas, town centres and other large sites.⁴
- 2.5 Accommodating growth using this approach means that, by 2041, population density will reach levels that cities like Rio, Osaka and Bangkok experience today, or double the density levels of cities like Paris, Rome and Berlin.⁵

London is the size of 24 other major cities



Source: London Housing Strategy, GLA, 2014

By 2041 London's population will have grown by 22 per cent - as will the population density



Accommodating the expected growth within London's boundaries will increase population densities to levels that cities like Rio, Osaka and Bangkok experience today.

Source: GLA 2013 round of projections

- 2.6 The existing approach to identifying sites for new housing is defined by the capacity of those potential sites, both now and into the future. It is further defined by a matrix of sustainable housing densities (calculated in relation to public transport accessibility and urban character) that can be achieved in different locations.

Questions for the new Mayor

Can the existing policy of optimising housing development on different sites, according to the sustainable residential matrix, continue to deliver the scale of homes needed?

Can the upper limits of the density matrix be extended and still deliver sustainable residential quality?

- 2.7 To assist this debate the report identifies where housing might be built (sites and locations) and how density can be increased sustainably (design approaches). It specifically focusses on three aspects:
- Whether the compact-city approach can deliver the homes needed without jeopardising sustainability, particularly in Inner London;
 - How density can be increased through different typologies and whether tall buildings contribute to meeting housing need; and,
 - How areas in suburban London and outside London's boundaries might contribute more homes.

Conclusions

- Unless housing capacity, and the density at which it is delivered, can increase, London will face a growing housing crisis.
- After 16 years of maintaining the same approach to accommodating London's growth within its boundaries, the new Mayor must review this central policy in the London Plan.
- Options exist to bridge the gap between housing need and the capacity to add to London's housing stock. A realistic assessment needs to be made of the contribution of each of these in terms of years of housing supply and potential constraints on delivery.

3. Continuing and extending the compact city approach

- 3.1 The compact-city approach has been a feature of all London Plans since 2000. This approach requires high-density, mixed-use, mixed-income developments to be located near well connected transport nodes and town centres to improve access to jobs and services, while reducing reliance on private cars. Large numbers of people can sustain schools, local shops and other facilities in a way that a more dispersed community cannot. London's established network of well-connected town centres is well suited to this approach.

Inner London

- 3.2 The newly published London Plan continues the existing approach to growth. To bridge the gap between housing need and supply, densities will need to increase, especially within London's opportunity areas and town centres. Inner London has been given a significant part to play in this objective.
- 3.3 The 13 Inner London boroughs have been allocated 49 per cent of London's housing target (208,000 homes).⁶ While the targets reflect potential housing capacity, in terms of site availability, accessibility and viability (according to the sustainable residential quality matrix), they also fall on boroughs with already some of the highest population densities in London, and the lowest proportions of open space – for example Tower Hamlets, Southwark, Hackney and Lambeth.

Population density is highest in Inner London – where the highest housing targets also predominate



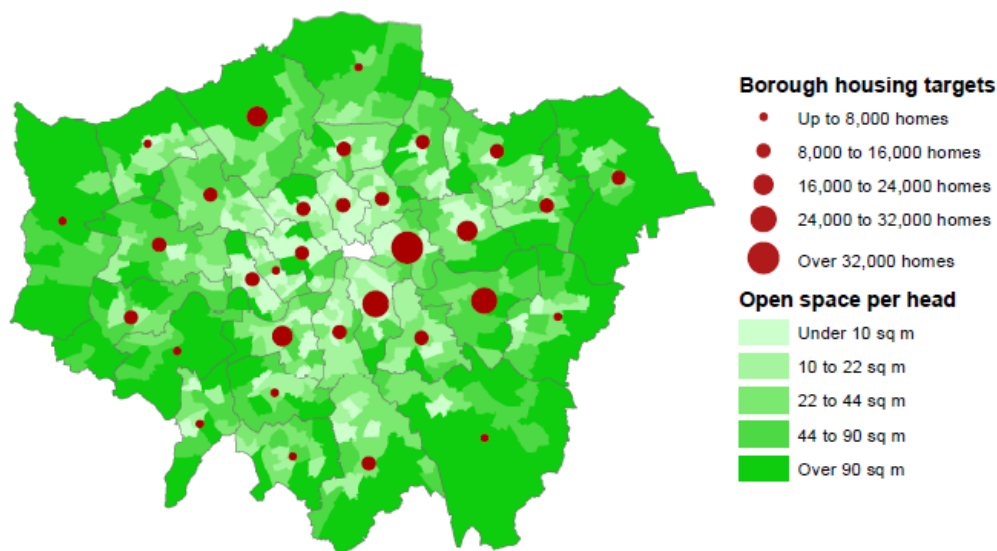
Population density



Annual housing targets

Source: GLA Secretariat, 2015

Some boroughs with the largest housing targets already have limited open space per person



Source: GLA Secretariat, 2015

- 3.4 To be sustainable, new homes must be supported by a range of infrastructure. The London Plan details these examples, such as health provision, nurseries, schools, play and recreation space.⁷ The Infrastructure Plan suggests London may need: more than 600 new schools and colleges; workspace for another 1.4 million jobs; around 50 per cent greater capacity on the public transport system and local energy production to cope with a 20 per cent surge in energy demand;⁸ and community infrastructure such as open space, community and cultural facilities, and healthcare centres.
- 3.5 These facilities require land, and suitable sites, in close proximity to new homes. However, there is evidence that the increased housing targets are putting pressure on some boroughs to make stark choices in prioritising infrastructure where sites are limited.
- 3.6 Some boroughs with the largest housing targets already have limited open space. For example, the London Borough of Tower Hamlets has been forced to allocate a site to a school in preference to open space since both cannot be provided.⁹ Such trade-offs suggest that building more homes in already densely populated parts of London may adversely affect sustainability and threaten the quality of life of existing and future residents.

Question for the new Mayor

New homes require a full range of supporting infrastructure. In areas where available land is at a premium (including sites in Outer London), are increased housing targets putting pressure on boroughs to make stark choices in prioritising infrastructure where sites are limited?

Conclusions: Inner London

- The next Mayor should review the London Plan's sustainable residential quality matrix. An assessment should be made of the need to include capacity for supporting infrastructure alongside the current factors of transport accessibility and urban character.
- Beyond the current round of housing monitoring targets (2025), the new Mayor should review the ability of the most densely populated parts of London, including Outer London, to accept further large numbers of new homes sustainably.

Brownfield land and windfall sites

- 3.7 Existing national and London Plan policy prioritises development on brownfield land and a number of organisations have calculated the amount of brownfield land available in London and the resulting capacity of this resource for new homes.
- 3.8 The Campaign to Protect Rural England (CPRE) estimates there is around 2,650 hectares of brownfield land in London suitable for development for housing with capacity for 146,530 homes.¹⁰ Centre for Cities suggests that if every brownfield site were developed to its full capacity there would be enough brownfield land for around 382,500 new homes in the capital.¹¹ Other recent estimates suggest that new-build projects in the capital could deliver 570,000 extra homes, enough to match expected need by 2024, by redeveloping 'hot spots' forming just 1.3 per cent of the capital's land area on average, while preserving all green space.¹² However, at best, this still only represents around ten years supply of land.
- 3.9 Not all brownfield sites are suitable for development. The Lyons review notes that if the costs involved in purchasing the land, remediation and preparation, the costs of infrastructure and the construction of the homes outweigh the receipts from selling them, brownfield land will not be economically viable.¹³ A preoccupation with squeezing out every brownfield site may be making housing more expensive than necessary.¹⁴

- 3.10 New transport infrastructure can open up sites and boost housing capacity. Barking Riverside is the largest housing development in east London, with planning permission for up to 10,800 new homes, as well as healthcare, shopping, community and leisure facilities. Significant transport infrastructure must be built to ensure the development is sustainable and, without a rail link, no more than 1,500 homes can be built.¹⁵
- 3.11 Almost all brownfield land in London will be contaminated by previous uses. The costs of decontamination and remediation add to development costs. In addition, there is the risk of future identification of unknown environmental hazards that will attract the requirement for further decontamination. This deters development of highly contaminated sites. One potential solution is environmental insurance.¹⁶ This is a specialist market – but London is the centre of global insurance that thrives on innovative products in response to market demands.
- 3.12 The Mayor has, to date, released 98 per cent of its land portfolio for development. The London Land Commission¹⁷ has been tasked with identifying further public sector brownfield land that is no longer needed in London. It must ensure that all of the capital's brownfield sites are developed and help meet its target of over 400,000 new homes by 2025.¹⁸ The Government will provide £1 million to help establish the Commission which will be jointly chaired by the Mayor and a Government Minister, with representatives of public bodies.
- 3.13 The changing nature of service provision has the effect of delivering 'windfall sites', for example old hospital facilities and industrial areas. These offer the potential to deliver housing quickly. Sites such as Mount Pleasant, however, suggest that the Mayor should be in a position to respond in a strategic way rather than react in an ad hoc manner (through his planning decisions power).¹⁹ Better co-ordination with the London Land Commission and the boroughs might identify a list of potential windfall sites and enable these to be integrated more strategically into London's 'housing land bank'.
- 3.14 Transport for London (TfL) owns around 5,700 acres of property in London, making it one of the capital's largest landowners. By developing this portfolio, much of it for housing, more than £1 billion in revenue from rents will be generated over the coming ten years.²⁰
- 3.15 Large amounts of TfL's property are situated at or nearby transport nodes which make them hugely attractive from a developer's point of view and particularly suitable for high-density housing. As a public sector body, TfL's development plans should not focus purely on maximising financial returns.

TfL must be expected to use its assets to deliver broader benefits for the city in line with the Mayor's priorities – including helping to meet affordable homes targets.

- 3.16 Affordable housing is part of a suite of benefits, including open spaces and other amenity improvements that will be delivered under the section 106 contributions for these schemes.
- 3.17 In total, there is the potential to deliver around 9,000 residential units, making a significant contribution to the homes London needs. Affordable housing requirements will be established in discussion with the local borough through the planning process.
- 3.18 The TfL property development programme demonstrates that the Mayor can be proactive in this manner and increase the supply of housing sites for London.
- 3.19 In addition, and more recently, the Government has sought to address the issue of surplus public land through provisions in the Infrastructure Act 2015. Section 31 of the Act gives the Secretary of State the power to transfer land from a public body to the Homes and Communities Agency (HCA) which will act as a coordinating body for the disposal of surplus public land. In London the Mayor exercises the power of the HCA and it can be expected that transfer of surplus public land will further swell the Mayor's land portfolio with sites suitable for new homes.²¹

Conclusions: Brownfield land and windfall sites

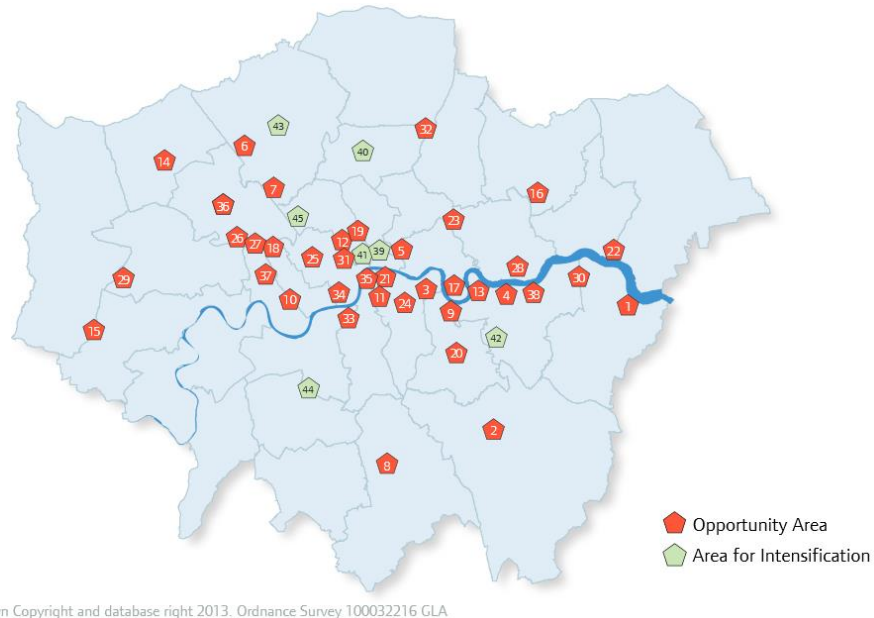
- New sources of viable housing development land must be urgently identified to ensure sites are adequately planned and provided with supporting infrastructure to guarantee sustainable development.
- London's supply of brownfield land is limited by issues of accessibility and economic viability. New approaches, such as rethinking the phasing of transport infrastructure, co-ordinating attempts to identify surplus land, or making heavily contaminated sites economically viable, may be needed to maximise the supply of brownfield and in particular those that face particular challenges for development.
- The new Mayor must reconsider the extent to which new transport infrastructure projects are co-ordinated with sites that have the potential to deliver large numbers of homes. They need to be better planned, phased and funded, if London's reservoir of brownfield land is to be exploited effectively.

- The new Mayor should take advantage of London's place as a global centre for insurance and work to develop innovative thinking surrounding insurance to cover land remediation costs. This might make currently difficult sites economically viable.
- The new Mayor must continue to realise the potential of the London Land Commission. They must continue to work effectively with the relevant Government Minister, lobbying for more funding and powers if required, to ensure the Commission plays a full part in solving London's housing need.

Opportunity Areas

- 3.20 London's Opportunity Areas and a smaller number of Intensification Areas have the potential for 562,800 new homes (between 9 and 13 years' housing supply). They now have added importance in the task of accommodating growth and bridging the gap between housing need and supply. As set out in the London Plan, Policy 2.13 expects Opportunity Areas to meet, and where appropriate exceed, the minimum guidelines for housing capacity.²²
- 3.21 Opportunity and Intensification areas were introduced in the first London Plan. Opportunity Area Planning Frameworks (OAPF) set out planning, regeneration and design guidance for major growth centres in London. Once drafted (in partnership between the Mayor, boroughs and other strategic partners), consulted on and published, they form supplementary guidance to the London Plan.
- 3.22 There are adopted frameworks for 130,000 new homes (23 per cent of the potential) while frameworks covering 50 per cent of the new homes are under review. Frameworks with another potential 150,000 homes are proposed or in preparation.
- 3.23 Some Opportunity Areas, such as Kings Cross, are well regarded, while others have been criticised for being over developed and not adhering to the published principles.

London's 38 Opportunity Areas have the potential for a significant proportion of new homes and jobs



Source: The London Plan, 2015

- 3.24 Many of the Opportunity Areas rely on significant infrastructure investment (particularly transport) to allow them to support the number of new homes at the densities London needs. However, the approaches to securing the planning and funding needed have been variable in their success and timescale.
- 3.25 Construction of the Northern Line Extension (NLE) at Vauxhall took only nine years to start after the original transport options study. The full cost of the NLE is expected to be up to £1 billion, which is being funded entirely through contributions from the developments in the area benefitting from the extension. An innovative funding package has been agreed between the Mayor of London and Government, which includes the creation of an Enterprise Zone from 2016, for a period of 25 years.
- 3.26 This approach can be contrasted with the London Riverside Opportunity Area that contains Barking Riverside and has planning permission for up to 10,800 new homes.²³ Here, significant delays in providing the necessary infrastructure have prevented delivery of a significant housing site.

Conclusions: Opportunity Areas

- The next Mayor needs to push hard on getting the infrastructure needed to support new homes in London's Opportunity Areas. More innovative thinking is required to bring forward funding proposals speedily as in Vauxhall as opposed to the example of Barking Riverside.
- Opportunity Areas have the capacity for higher density-housing, but only where they are supported by adequate infrastructure and where the proposals are properly consulted on and adhered to.
- The new Mayor needs to focus on better ways of involving the community to ensure the required intensity of development is positively welcomed rather than feared or opposed if the Opportunity Areas are to play a full role in accommodating London's growth.

Regenerating London's housing estates

- 3.27 In the last ten years, 50 estates with over 30,000 homes have undergone regeneration schemes, delivering nearly twice as many new homes on the sites of London's demolished social housing estates as were there before.²⁴
- 3.28 The potential for increasing density can be seen from a few recent estate regeneration schemes that have been delivered or are planned:²⁵
- Bacton Estate, Camden – 196 per cent increase in housing density.
 - Hallsville Quarter, Newham – 159 per cent increase in housing density.
 - Myatts Field North, Lambeth – 154 per cent increase in housing density.
- 3.29 Experts have estimated that 360,000 dwellings across London are in post-war council estates.²⁶ If a significant proportion of these estates were regenerated at density levels similar to the examples above, a large number of new homes could be built.
- 3.30 Once a decision has been made to invest in new homes, there are a variety of options for estate regeneration. These include: demolition and comprehensive redevelopment, additions to existing blocks and smaller infill using underused open space or redundant uses such as garage blocks.²⁷
- 3.31 Adoption of either approach will be a function of a variety of factors, and can only be made on a case-by-case basis. Demolition and rebuild is most suited to low-density sites, where the existing accommodation is of a poor standard in terms of build quality, space or accommodation type.

- 3.32 Smaller scale and infill schemes are less intrusive for existing residents and mean that residents can feel part of the regeneration process. They allow for a net gain in the number of homes without the need for disruptive ‘decanting’. Furthermore, this approach can often be delivered relatively quickly. Research suggests that, if all boroughs fully explored this potential, at least 10,000 new homes could be delivered across London from infill sites within the next ten years.²⁸
- 3.33 Comprehensive and large-scale estate redevelopment is complex and expensive. With the reduction in the amount of grant available, a number of complex financial models have evolved that help realise development and the financial model used will often shape the scale and housing mix of the regeneration scheme. As well as straightforward cross subsidy from the sale of market housing, there is a range of funding sources used to deliver estate regeneration. These include the Mayor’s Affordable Housing Programme and Estate Regeneration Fund, the New Homes Bonus, local authority Housing Revenue Account borrowing and the Private Finance Initiative.

Conclusions: Regenerating London’s housing estates

- 3.34 London’s housing estates are, for a variety of factors, particularly suitable to bridge the gap between the capital’s housing need and the capacity to deliver new homes and to generate the increased densities needed:
- They are in single ownership;
 - Many were built at densities significantly lower than that considered sustainable today;
 - Many estates are in highly accessible locations that can support higher densities; and,
 - Many estates, due to their age, design and maintenance history, require renewal.
- 3.35 The Assembly has identified a number of best-practice principles of effective estate regeneration²⁹ and the new Mayor must advocate these if estate regeneration is to play a part in accommodating London’s growth while maintaining the support of existing tenants. Proposals must:
- Be robust by being clear from the outset on the purpose of the proposed regeneration and how it fits within a broader strategy for the local area and borough, communicating this early, openly and broadly, and ensuring a systematic and objective option appraisal is undertaken and published.
 - Have fully justified any regeneration proposal for which the provider considers there to be no viable alternative. An independent ballot of

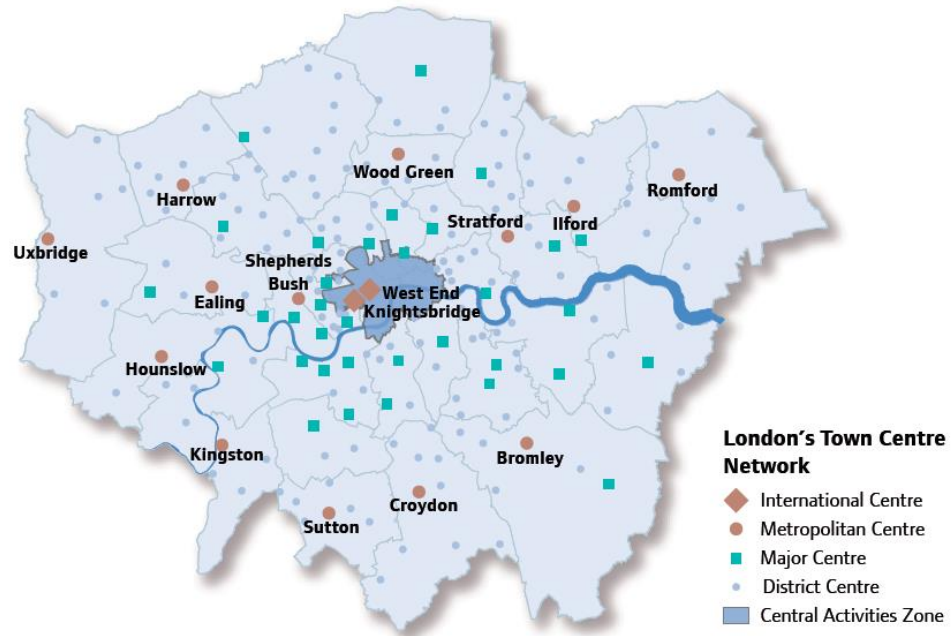
estate residents, for example, could inform any final proposals to demolish.

- Enable all residents to understand the impacts for them as the scheme progresses and evolves. Where contractors or consultants are engaged, they should have strong track records in effective communication and the provider should nonetheless maintain a close relationship with residents, especially where progress stalls and revised proposals are needed.

London's town centres

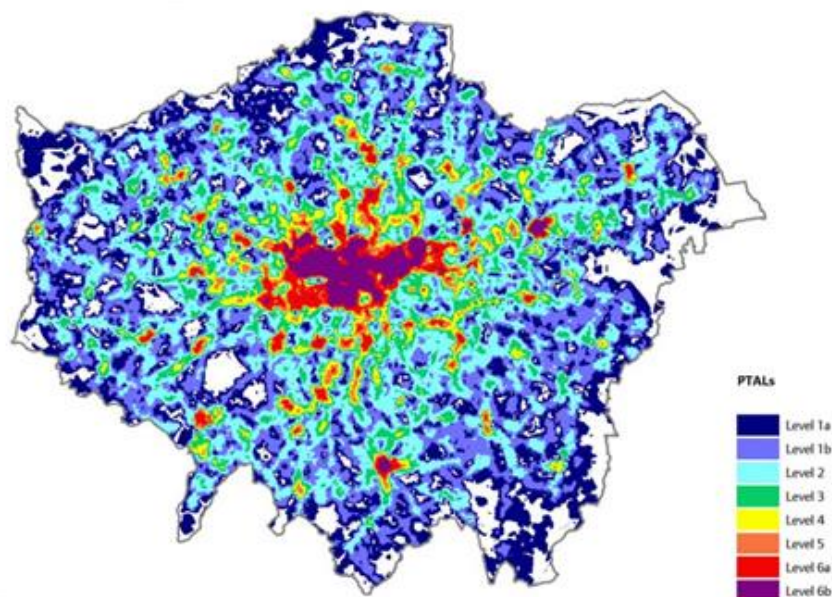
- 3.36 London's network of more than 1,200 town centres has considerable potential for new homes (particularly for smaller households and even older people). Changes in retail behaviour have opened up space for new homes, and increasing the residential population in town centres has the benefit of supporting the retail offer that remains.
- 3.37 In 2013, the Assembly published a report on town centres with a range of recommendations including that local authorities could consider a managed contraction in favour of a smaller, but more vibrant, retail core, including leisure, health, education and public services. This would also provide more opportunities for well-located and designed high-density housing, especially around stations and transport interchanges.³⁰
- 3.38 London Plan Policy 2.15 reflects the conclusions of this report and encourages local authorities to "proactively manage the changing roles of town centres... promoting diversification, particularly through high density, residential led, mixed use re-development."³¹ In effect, this will mean some town centres expand and flourish, while others may decline.

The London Plan identifies over 1,000 centres, some with significant capacity for new housing development



Source: London Plan, 2015

London's town centres generally correspond with high public transport accessibility



Source: London Plan, 2008

- 3.39 Notwithstanding the support for increasing housing in town centres, the Assembly has concerns that the effect of relaxing permitted development rights (change of use from office and retail to residential) will result in the loss of employment space in an unmanaged way, and result in poor quality flats with no affordable housing.
- 3.40 The Assembly supports the current Mayor's opposition to this policy and believes the next Mayor needs to continue offering evidence that employment opportunities in London's town centres need to be protected at the same time as residential development is encouraged.

Conclusions: London's town centres

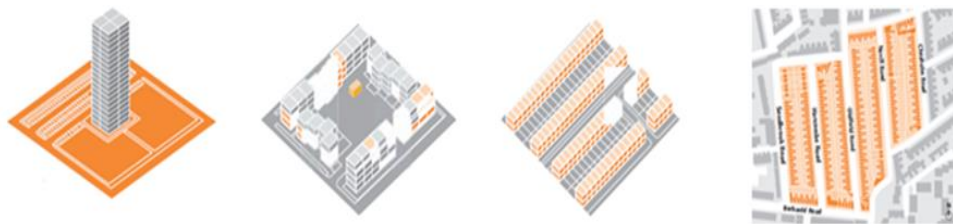
- Increasing residential capacity in London's town centres may have wider benefits, and be publicly more acceptable than some Opportunity Areas, if implemented sensitively.
- The new Mayor should continue support for well-designed, high-density housing in town centres as a solution to the housing crisis and to support retail and other uses.
- London's unique property market makes the protection of employment uses from conversion to housing vitally important. The next Mayor must continue to promote a strategic approach to permitted development and should lobby Government vigorously (in conjunction with other partners) to allow London to adopt an approach that is different from national policy. A balance between maintaining employment and increasing housing density in town centres must be struck.

4. How can density be increased through different typologies and different locations?

- 4.1 The number of households in London will grow by 27 per cent in the next 20 years.³² The GLA's Strategic Housing Market Assessment suggests that the number will rise from almost 3.3 million to just over 4.2 million by 2035. Households with children are projected to comprise 31 per cent of the projected growth, and so 279,000 new family homes will be needed in the next 20 years.
- 4.2 London Plan Policy 3.8 (Housing Choice) calls for new developments to offer a range of housing choices, in terms of the mix of housing sizes and types, ensuring that account is taken of the needs of particular communities with large families.
- 4.3 No matter which model of growth is adopted, London's housing density must increase. The capital is a relatively low rise, medium density city, but in an effort to make London a more sustainable 'compact' city, new housing development will need to be built at densities higher than those seen in modern times. Already, over two-thirds of all planning consents are for projects at densities above those allowed by the London Plan for their locations.
- 4.4 High density does not have to mean higher rise development. There are many studies that illustrate how high density schemes can provide good quality, attractive housing and ensure the most efficient use of land.³³ Others advocate the creation of more and better urban homes with terraced streets of houses and apartments, rather than complex multi-storey buildings.³⁴
- 4.5 Through a combination of policy and housing design guidance a new approach to housing is emerging that mixes housing types and tenures in the form of a 'new London housing vernacular'.³⁵ Principle features of this new vernacular include the following:
 - A maximum number of homes should have their own front doors directly opening to the street, often through the use of maisonettes at lower levels.
 - Ground floors should be taller than intermediate floors, or combine with first floor as maisonettes to create a pronounced podium.

- Elevations should be wholly or predominantly faced in brickwork.
- Internal circulation space should be rarely shared by larger family units, which either have direct access from the street or are served by galleries or decks on the top floor.
- Semi-private outdoor space within a block should be visible from public space.
- Some car parking should be on street and the balance in either underground car park or an undercroft.
- Windows should be recessed in deep reveals.
- Balconies should be recessed, sometimes with brick reveals.

Different approaches to housing typologies can provide the same densities



Source: Housing for a compact city, GLA 2003

Family housing – with good practice, we can build it at high densities

- 4.6 Existing policy and guidance recognises the inherent benefits of larger family housing being provided at relatively low densities. The Housing SPG states that in broad terms, higher densities will be more suitable for households without children and will require less open space and play provision.³⁶
- 4.7 However, the London Housing Federation has concluded that families can live in high-density schemes, although serious consideration needs to be given to housing families with children above ground level.³⁷

Question for the new Mayor

To meet the real and urgent challenge to make the provision of high density family homes work, should some family homes be provided above ground floor level?

- 4.8 To work effectively in the long term, family homes need to offer levels of amenity approaching those provided by single-family houses at ground level. Key considerations include providing:
- Private open space of sufficient size for the whole family and visitors.
 - Providing a child-friendly environment and appropriate levels of play space.
 - Limiting the number of dwellings sharing each floor and each access core.
 - Providing good circulation spaces above the third floor.
 - Ensuring adequate levels of visual and acoustic privacy.
- 4.9 Private open space can be provided in different ways. As well as large balconies, private garden space can be provided at roof level, and secure courtyard space has proved successful in many European cities.³⁸
- 4.10 St Andrews, Bromley-by-Bow, is considered a good example of a development where family housing has been successfully provided at high densities.³⁹ Others have commended examples where redevelopment has provided both density and traditional low-rise street pattern housing.⁴⁰

Family housing can be successfully built at high densities and in traditional street patterns



Source: Barratt Homes: St Andrews, Bromley-by-Bow (L) and Create Streets: Myatt's Field North, Lambeth (R)

- 4.11 London Plan (Policy 3.6) recognises that in a densely urbanised city like London, safe and stimulating play and recreation space for under-18s are essential for a child's welfare and future development. It states that new development, including housing, should make provision for play space. New provision is based on the accessibility of existing facilities and a minimum benchmark of 10 square metres of dedicated play space provision per child that would be generated by new development.
- 4.12 Despite this commitment, the 'play space' SPG acknowledges that "existing national standards [for children's play space] are too high for practical application in London."⁴¹ Existing national standards are around four times higher than that achieved in London and boroughs have, as a consequence, been using a "more realistic and achievable figure as a benchmark standard for London."⁴²

Conclusions: Family housing at high density

- The new Mayor needs to continue to prioritise family homes in London. If these homes are provided at high densities, it must be ensured that the homes are of the highest design and provide adequate space internally and externally.
- The new Mayor must continue to ensure the standards boroughs are requiring in terms of play space and other key features needed by families are maintained. Should these standards come under pressure in parts of London, the new Mayor should review reductions in housing targets or extra investment to provide adequate supporting infrastructure to make this kind of housing sustainable.

Different approaches for different areas

- 4.13 Opportunity Areas represent the single biggest location for London's future homes. However, there are many other smaller sites that offer scope for a significant contribution: for example, estate infill (45,000+) and small and difficult sites (33,000+).^{43 44}
- 4.14 Small and infill developments are particularly suitable for smaller developers. Large developers currently dominate London's house building industry, but alone do not have the capacity - and some say the will - to build the number of homes London needs. The London Assembly Housing Committee has argued that to increase overall capacity, the public sector must do all it can to encourage new entrants to the market, especially small and medium-sized developers.⁴⁵ These developers, who are less likely to have significant land banks, have an incentive to build out their sites quicker than developers with large land banks.

- 4.15 New housing typologies include: single-sided mews and courtyards; mixed terraces (flats and houses); stacked and interlocked homes; additions to existing blocks and courtyard blocks.⁴⁶

Housing, at relatively high densities, can be provided in a variety of ways and different kinds of sites



Estate infill could generate at least one year's housing supply (top left)

Family homes can be provided with private gardens at roof level (bottom left)

Stacked and interlocked homes provide a mix of housing types and sizes on one site (top right)

Source: Esther Kurland, Design for London, Presentation to Planning Committee 18 March 2015

- 4.16 There are numerous successful European examples that are suitable for London. High-density, inner-city neighbourhoods in Berlin exceed London's maximum housing density. This housing has generous public space and semi-public internal courtyards rather than private gardens.
- 4.17 New-build housing in Copenhagen combines high-density living at the edge of the city with access to nature. Here, trade-offs have been made between a range of housing qualities to provide high-density, family accommodation without the provision of a private garden or open outdoor space at ground level.⁴⁷

Conclusions: new housing typologies

- As well as large-scale development in the Opportunity Areas, the Mayor needs to support innovative approaches to small sites, as well as infill in

existing estates, as they offer a potential role for small developers, self-build and community trusts.

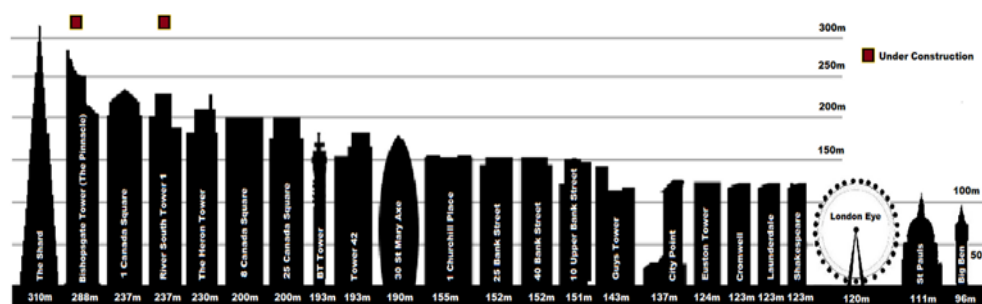
— The new Mayor should:

- Research the role different housing types could play in delivering new homes.
- Support architects, financiers and developers to find solutions to difficult sites and schemes.
- Highlight the innovation taking place and help communities, councillors and planners understand it.

Tall buildings

- 4.18 London is about to see an explosion in the number of tall buildings, as the capital's population increases and investors pour money into London real estate which will have a significant impact on the London skyline, streets and public spaces.⁴⁸
- 4.19 The number of planning applications for tall buildings in London is accelerating. A survey by New London Architecture suggests that 263 buildings of more than 20 storeys could be on the way in London, 80 per cent of which are intended to be residential.⁴⁹

In 2000, the London Eye was the 4th tallest structure in London -15 years later it is only the 22nd tallest



Source: London Skyline Chart

- 4.20 The GLA suggests that tall residential buildings that have recently been approved have the potential to provide 35,000 homes.⁵⁰ However, it is unclear how many of these new homes are either affordable, or accessible to low and middle-income Londoners.

- 4.21 The economics of tall buildings suggest that new high-rise developments are usually high value with few affordable options.⁵¹ A large body of opinion suggests this approach does little to address London's general housing shortage and particularly affordable family homes.

Schemes for ever taller residential towers are coming forward



Five of the tallest apartment blocks ever seen in London were given permission in 2004.

Source: Evening Standard, 19 November 2014

Berkley Homes has submitted plans for the UK's tallest residential tower – 75 storeys with more than 1,000 flats.

Source: Berkeley Homes

- 4.22 London seeks to manage the location, design and impact of tall buildings through planning policy and guidance. There is considerable debate about how effective this is and whether these policies are being given adequate weight relative to other considerations when planning decisions are being made.⁵²
- 4.23 Tall buildings impact on the skyline, affect London's heritage (UNESCO has issued warnings about the threat to Westminster's world heritage status)⁵³ and questions remain as to their sustainability.
- 4.24 In environmental terms, especially in relation to embodied energy and carbon footprint, the taller the building the higher the amount of embodied energy required per useable square metre. The taller a building is the less likely it is that low carbon alternatives can be used and tall buildings suffer more highly from heat losses for the same amount of insulation as lower buildings because of the higher wind speeds. Tall buildings need more lifts than shorter ones, further increasing energy usage.

- 4.25 From the point of economic sustainability, tall buildings cost more to build per useable square metre, and they cost more to maintain and repair per square metre. They tend to be difficult to adapt, and the cost of retrofitting is high. To date, there is no suitable façade or cladding system or any type of servicing, wiring that does not need replacing on a much shorter cycle.
- 4.26 Finally, with regard to social sustainability, unless they are well designed with plenty of spaces for chance encounters and social interactions, tall buildings can have an adverse effect on the mental health of those who live in them. It is particularly true for housing, especially for families with children. Crime, and fear of crime, is also greater in tall buildings. Most people benefit from some regular access to outside space, but, as you get higher, it is much more difficult to design external balconies.⁵⁴
- 4.27 The Assembly is unanimous in seeking the Mayor to get a tighter grip on the issue through tougher planning policies and better control of design approaches.⁵⁵

Questions for the new Mayor

To what extent does the rapid increase in the number of tall buildings in London need to be controlled?

Should the Mayor strengthen policy to restrict the location and improve the design of skyscrapers?

Conclusions: tall buildings

- Tall residential buildings are not an answer to London's real housing needs and as such should not be encouraged outside of a few designated and carefully managed areas of London.
- High densities can be achieved by approaches that are more suitable for families, more in keeping with London's traditional form and less intrusive on the skyline.
- The new Mayor must adopt a much tougher stance on tall residential buildings and should:
 - Establish a 'skyline commission' to advise on the design impact of tall buildings.
 - Adopt more detailed and rigorous master planning process in relation to tall buildings, especially within Opportunity Areas.

- Draw up a London Plan policy that formalises the 'clusters' policy for tall buildings.
- Undertake a review of existing protected views, with the intention of adding new viewing corridors.
- Support the development of a 3D computer model of London's emerging skyline.
- Adopt a requirement for all developers with proposals for tall buildings to consider other building configurations — specifically that “alternative methods of achieving the same goals and densities should be demonstrated, shown and considered, as a prior condition”⁵⁶ so that tall buildings are not immediately seen as the answer.

Suburban intensification

- 4.28 Should the sources of development land and approaches to increasing density described above exhaust London's supply of sustainably developable land (currently estimated to be around ten to twenty years housing supply), then other approaches need to be considered.
- 4.29 Outer London covers around 80 per cent of the capital's land area but contains only 60 per cent of the population and provides 61 per cent of London's total dwelling stock. The population density, at 39 persons per hectare, is substantially lower than Inner London's figure of 101 persons per hectare.⁵⁷ These are average figures, and it should be noted that in some suburban town centres population densities approach those of Inner London.
- 4.30 The Mayor believes that “if London is to accommodate a large proportion of its growth within its borders, it will be necessary to increase densities in Outer London, at least to some extent.”⁵⁸ The nature of some of London's suburban housing can be relatively poor quality, energy inefficient and potentially ready for renewal. It has been noted that some, less affluent privately-developed suburban areas, are fragile and changing, and also require renewal measures as the housing stock deteriorates.⁵⁹
- 4.31 Calculations suggest that addressing suburban under occupancy and increasing density could add an additional ten years supply of new homes. If just ten per cent of semi-detached housing in Outer London was fully occupied rather than part occupied, it could accommodate an additional 100,000 people. If ten per cent of semi-detached housing was redeveloped at twice its existing density it would accommodate a total of 400,000 new homes, all of which would remain within the London Plan sustainable residential quality density matrix.⁶⁰

- 4.32 While there are examples of suburban intensification, these tend to centre on existing housing estates in single, normally borough, ownership. The former 270 acre Ferrier Estate in Kidbrooke (Greenwich) had more than 2,000 homes but is now being redeveloped with 4,000 mixed-tenure homes. Housing in areas that are in single ownership, like local authority estates, is easier to intensify. Areas predominantly privately owned, however, provide significant barriers to intensification.

Questions for the new Mayor

What are the new Mayor's views on increasing the density of London's suburban housing?

The challenge is as much political as it is a housing issue, so how will the new Mayor start to generate a debate with the suburbs?

Conclusions: suburban intensification

- The intensification of density in suburban London has already begun. But, aside from estate regeneration and intensification of suburban town centres, the private nature of suburban housing offers additional challenges to increasing density that must be met.
- Given the scale and potential contribution of suburban London, the new Mayor must continue efforts to resolve the challenge of suburban redevelopment. This is especially true if green space and the Green Belt are not considered for development.

5. Building outside London

- 5.1 While, overall, London has identified sites for additional housing capacity to meet the next 10 -20 years housing need, for a variety of reasons some of this notional capacity may be unrealistic.
- 5.2 Not all of these sites might come forward for development. For example, sites in Inner London, as argued above, may be better allocated for supporting infrastructure; brownfield sites may be unviable without transport infrastructure for which there is no funding; or suburban town centres and sites might deliver insufficient density due to issues of accessibility or damage to existing character.⁶¹

Accommodating growth outside London

- 5.3 The London Plan outlines an annual housing need of between 49,000 and 62,000. The implications of these figures suggest that a significant proportion of London's housing need (between 16 and 47 per cent) will have to be met outside the capital.
- 5.4 The Inspectors Report into the Further Alterations to the London Plan recommended that the Mayor should engage local planning authorities beyond the GLA's boundaries in discussions regarding accommodating sufficient numbers of new homes.⁶² This would require a shift in the strategy of managing growth within London's boundaries.
- 5.5 A recent GLA Conservatives report noted it will be increasingly difficult to build the necessary numbers of homes within the confines of Greater London, due to land and space constraints, and argued for powers to permit London, in partnership with county councils, to create new Garden Suburbs.⁶³
- 5.6 There have been a range of other suggestions for accommodating London's growth – and historical precedents for different approaches. Some of these that might be considered are:
- Directing growth to areas outside London that are well connected to the capital through improved transport infrastructure.
 - Some form of "regional" policy designed to direct growth away from the capital — perhaps expanded or new towns, across the south east or beyond.

- 5.7 Directing London's growth away from its current boundaries might require a joint strategic plan on a regional level covering London as well as the Home Counties.⁶⁴ The Government does not intend to re-impose regional plans⁶⁵ but there is a clear expectation, through the Duty to Co-operate as set out in the Localism Act 2011 to ensure that all of the bodies involved in planning work together on issues that are of bigger than local significance.

Conclusions: Building outside London

- Should the brownfield reservoir dry up, the Opportunity Areas be built out, and intensification of town centres and the suburbs prove challenging, then accommodating growth outside London is the last remaining option.
- Dialogue with the rest of the south east is vital if London's growth can be accommodated and to do so will require establishing effective regional co-operation on new housing.
- Directing London's growth away from its current boundaries would require some kind of joint strategic plan on a regional level covering London as well as the Home Counties. As this is likely to run counter to Government policy a new Mayor will have to build the case and convince sceptical authorities outside of London.

6. The Green Belt

- 6.1 The Green Belt comprises 22 per cent of London's total area. The London Plan strongly supports the protection, promotion and enhancement of London's open spaces and protecting the current extent of London's Green Belt and Metropolitan Open Land.
- 6.2 The National Planning Policy Framework (NPPF) consolidates the Government's view on its planning priorities and guidance. It attaches great importance to Green Belts, but recognises that they are capable of being reviewed in exceptional circumstances, through the review of the Local Plan. A number of London boroughs have reviewed, or are reviewing, their Green Belts. The London Borough of Redbridge is currently consulting on "four options to help identify areas for much needed housing and community facilities." Three of the four options would involve de-designation of sites within the borough's Green Belt.⁶⁶
- 6.3 Some commentators have recently called the role of the Green Belt into question,⁶⁷ and have pointed to areas where it may have failed to adequately perform the functions of Green Belt as set out in the legislation.⁶⁸ To resist this pressure, supporters of the Green Belt need to ensure that its original purposes are being served.⁶⁹
- 6.4 More significantly, if a 21st Century Green Belt could offer more strategic benefits to London it might be able to resist pressure for development. Counter arguments could then be made that it is fulfilling valuable functions in relation to London's strategic challenges. These might include more food production, better contributions to climate change mitigation and adaptation, a source of sustainable water storage, and so on.⁷⁰

Conclusions: the Green Belt

- If the Green Belt is to be retained, its functions should be redefined to fit the 21st Century. By performing a new range of strategic functions (such as contributing to climate change mitigation objectives) it may be easier to justify its retention in the face of housing demands. The new Mayor should revise Green Belt functions to reflect London's 21st Century strategic priorities.

Appendix 1: Questions for the new Mayor

Residential density

Can the existing policy of optimising housing development on different sites, according to the sustainable residential matrix, continue to deliver the scale of homes needed?

Can the upper limits of the density matrix be extended and still deliver sustainable residential quality?

Land for supporting infrastructure

New homes require a full range of supporting infrastructure. In areas where available land is at a premium (including sites in outer London), are increased housing targets putting pressure on boroughs to make stark choices in prioritising infrastructure where sites are limited?

Family homes

To meet the real and urgent challenge to make the provision of high density family homes work, should some family homes be provided above ground floor level?

Tall buildings

To what extent does the rapid increase in the number of tall buildings in London need to be controlled?

Should the Mayor strengthen policy to restrict the location and improve the design of skyscrapers?

Suburban housing density

What are the new Mayor's views on increasing the density of London's suburban housing?

The challenge is as much political as it is a housing issue, so how will the new Mayor start to generate a debate with the suburbs?

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Endnotes

¹ Paragraph 3.16b, The London Plan, March 2015 and the 2013 London Strategic Market Housing Assessment

https://www.london.gov.uk/sites/default/files/FALP%20SHMA%202013_0.pdf

² Paragraph 3.17a, The London Plan, March 2015

³ London Plan Policy 1.1: Delivering the strategic vision and objectives for London

⁴ London Plan paragraphs 3.17a and 3.19, policies 2.15: Town Centres, 2.13: Opportunity and intensification areas and 3.7: Large residential developments

⁵ London's current population density is 5,206 persons per square kilometre – with a population of 10.5 million it will rise to 6,714 (assuming the capital's boundaries remain the same). Rio's current population density is 6,850, Bangkok's 6,450 and Osaka's 6,400. Paris is currently 3,350 persons per square kilometre <http://www.citymayors.com/statistics/largest-cities-density-125.html>

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¹⁶ Dr Marcel Steward, Environmental Risk and Insurance Consultant, Planning Committee 22 January 2015

¹⁷ <https://www.london.gov.uk/priorities/housing-land/land-assets/london-land-commission>

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- ¹⁹ <http://www.london.gov.uk/priorities/planning/public-hearings/mount-pleasant-sorting-office>
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- ²¹ Wasted space to living place: Using surplus public land for housing in London. London First, March 2015
- ²² London Plan Policy 2.13: Opportunity Areas and Intensification Areas
- ²³ As well as healthcare, shopping, community and leisure facilities
- ²⁴ Knock it down or do it up? The challenge of estate regeneration, Housing Committee, February 2015 http://www.london.gov.uk/sites/default/files/KnockItDownOrDoltUp_0.pdf
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- ²⁷ Urban Design London has suggested that estate regeneration has the potential to deliver a minimum of 45,000 homes, while infill would deliver a minimum of 33,000 homes – Planning Committee, March 2015
- ²⁸ Gap in the market: building new homes in London on disused sites, GLA Conservatives, 2014 <http://glaconservatives.co.uk/wp-content/uploads/2014/07/gap-in-the-market.pdf>
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- ³⁰ The future of London's town centres, May 2013
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http://www.london.gov.uk/sites/default/files/Housing%20SPG%20FINAL%20High%20Res_0.pdf
- ³⁷ Capital Gains: making high density housing work in London, London Housing Federation, 2002
- ³⁸ Esther Kurland, and Philipp Rode, Planning Committee 18 March 2015
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- ⁴⁰ For example, Myatts Field North, Lambeth
<http://www.createstreets.com/essays/4589645470>
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population (aged 0-16), the standard would equate to 40 sq m play space per child.

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⁴⁷ Philipp Rode, LSE Cities, Planning Committees 22 January and 18 March 2015

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⁶⁴ Catriona Riddell, Planning Committee 22 January 2015

⁶⁵ <http://www.planningresource.co.uk/article/1332245/minister-states-opposition-formal-arrangements-manage-london-overspill>

⁶⁶ LB Redbridge, Planning Committee, 22 January 2015

⁶⁷ Delivering change: Building homes where we need them. Centre for Cities, October 2014

⁶⁸ Jonathan Manns, Director of Planning, Colliers International, Planning Committee, 22 January 2015

⁶⁹ The original purposes of the Green Belt are to: Check the unrestricted sprawl of large built-up areas; Prevent neighbouring towns merging into one another; Assist in safeguarding the countryside from encroachment; Preserve the setting and special character of historic towns; and assist in regeneration, by encouraging the recycling of derelict and other urban land

⁷⁰ Noel Farrer, President, Landscape Institute, Planning Committee, 22 January 2015

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Εάν επιθυμείτε περίληψη αυτού του κειμένου στην γλώσσα σας, παρακαλώ καλέστε τον αριθμό ή επικοινωνήστε μαζί μας στην ανωτέρω ταχυδρομική ή την ηλεκτρονική διεύθυνση.

Turkish

Bu belgenin kendi dilinize çevrilmiş bir özetini okumak isterseniz, lütfen yukarıdaki telefon numarasını arayın, veya posta ya da e-posta adresi aracılığıyla bizimle temasa geçin.

Punjabi

ਜੇ ਤੁਸੀਂ ਇਸ ਦਸਤਾਵੇਜ਼ ਦਾ ਸੰਖੇਪ ਅਪਣੀ ਭਾਸ਼ਾ ਵਿਚ ਲੈਣਾ ਚਾਹੋ, ਤਾਂ ਕਿਰਪਾ ਕਰਕੇ ਇਸ ਨੰਬਰ 'ਤੇ ਫ਼ੋਨ ਕਰੋ ਜਾਂ ਉਪਰ ਦਿੱਤੇ ਡਾਕ ਜਾਂ ਈਮੇਲ ਪਤੇ 'ਤੇ ਸਾਨੂੰ ਸੰਪਰਕ ਕਰੋ।

Hindi

यदि आपको इस दस्तावेज़ का सारांश अपनी भाषा में चाहिए तो उपर दिये हुए नंबर पर फोन करें या उपर दिये गये डाक पते या ई मेल पते पर हम से संपर्क करें।

Bengali

আপনি যদি এই দলিলের একটি সারাংশ নিজের ভাষায় পেতে চান, তাহলে দয়া করে ফো করবেন অথবা উল্লেখিত ডাক ঠিকানায় বা ই-মেইল ঠিকানায় আমাদের সাথে যোগাযোগ করবেন।

Urdu

اگر آپ کو اس دستاویز کا خلاصہ اپنی زبان میں درکار ہو تو، براہ کرم نمبر پر فون کریں یا مذکورہ بالا ڈاک کے پتے یا ای میل پتے پر ہم سے رابطہ کریں۔

Arabic

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العنوان البريدي العادي أو عنوان البريدي
الالكتروني أعلاه.

Gujarati

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