

### **Representation in respect of Policy D6 Optimising housing density Ch.3**

The new policy implies that the use of the Density Matrix (Sustainable residential quality matrix) is being subsumed if not actually abandoned into a more flexible and subjective consideration of a large bundle of design issues.

As a chartered planning and development surveyor, this no doubt well-meaning idea to promote quality development, seems to create the most effective possible, (but presumably unintended) means of undermining the Mayor's objective to tighten up the viability appraisal process to ensure planning applicants meet public policy requirements more fully, in relation to the provision of affordable housing, essential infrastructure and other public goods.

My reasons for this assertion are twofold:

1. Despite the considerable improvement in design skills and thinking in public service jobs related to planning, it is an unavoidable truth that the resources in local authority planning departments are increasingly insufficient to undertake what are necessarily highly sophisticated and complex multi-criteria analyses and to make judgements that weigh quality against quantity of development. From an advisory role in relation to professional ethics, with access to many mid-career professionals involved in planning and development across London, I am aware of the pressures on public sector staff, and also that many of the ethical challenges they face arise primarily from under-resourcing, as well as lack of time, skills and experience that are also manifest in their senior managers and political leaders. Planning is an area of public policy in which the development of a consistent body of decisions made are essential to bring coherence to highly diverse patterns of proposed development. The introduction of quality based decision-making to a wholly under-resourced process and system can only open the door to decision-making of highly variable quality, soundness and consistency, and thus potentially undermine the integrity of every other policy in the Plan. This does not seem to be an intelligent approach.
2. The effectiveness of viability appraisals depends on there being a clear and consistent baseline of policy requirements against which land buying decisions can be assessed, and challenged where a developer has paid more than he/she should have done, despite knowing the likely quantum of planning policy requirements. The Density Matrix needs to be seen as an integral part of setting that baseline. By having an entirely quality based assessment of density levels, the Mayor's attempts to apply pressure in land buying decisions will be entirely negated, as the planning applicant will be handed an open ended means of arguing unviability against a set of negotiable quality criteria that will only emerge after land buying decisions have been made. Surveyors acting for landowning clients will be able to pick and choose from a rapidly growing set of inconsistent planning decisions to justify what has been paid for the land, and thus support their cases for unviability.

I make these comments based on my own experience of working in development in London since the mid-1970s, and research interviews in 2014 with public officials and elected members trying to manage a density bonus system in the City of Toronto, as they found themselves effectively powerless to secure the necessary developer contributions to infrastructure and affordable housing, let alone design quality.

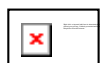
My recommendation is that the Density Matrix is made mandatory, so that planning authorities have a clear baseline against which they test viability, thus giving themselves an objective quantifiable ground on which to challenge developers who (might) have paid too much for their land. However, once the baseline criteria have been satisfied, councils and developers should have discretion to negotiate density bonuses, in which quality criteria and the necessary additional provision of public goods can be assessed against increases in density, based solely on the additional revenue generated by the additional density. That would ensure there would be no negative impact on the baseline viability position and the guarantee of delivering the policy compliant levels of affordable housing and public goods derived from the Density Matrix mandatory requirements.

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