

Examination in Public of the draft London Plan: Written submission by
CPRE London (1142) to the EIP Panel, December 2018

DESIGN - DENSITY

Matter 39: Would Policy D6 on optimising density be effective in achieving the intentions in Policy GG2 on making the best use of land and is the policy approach justified especially bearing in mind the cumulative impact on the environment and infrastructure? In particular: a) Would the provisions of Policy D6 provide an effective strategic context for the preparation of local plans and neighbourhood plans? Would the detailed criteria provide an effective and justified basis for development management, are they all necessary and do they provide sufficient clarity about how competing considerations are to be reconciled by the decision maker? b) Will leaving density to be assessed on a site-by-site basis compared to the matrix in The London Plan of 2011 be effective?

1. As stated in our submission on Matter 9, CPRE London strongly supports Policy GG2 concerning making the best use of land. We believe that Policy D6 is a vital mechanism for delivering this objective but we are concerned that to ensure that excessive housing densities in new development are resisted to avoid 'town cramming' and protect the character of London's neighbourhoods and avoid a lack of associated public infrastructure, including public green space. We therefore welcome Minor Suggested Changes 3.72-3.75 which address this last concern.

2. We are concerned that the design-led approach to optimising density proposed in Policy D6 does not contain sufficient safeguards to prevent overdevelopment. We believe therefore that there should be explicit reference to maximum density limits in Policy D6A. And while we welcome recognition that greater scrutiny is required the higher the density of development proposed, we believe that the density levels set out in Policy D6C at which particular design scrutiny is required in line with Policy D2 should be amended to: '1) 80 units per hectare in areas of PTAL 0-1; or 2) 170 units per hectare in areas of PTAL 2 to3; or 3) 260 units per hectare in areas of PTAL 4 to 6'. These stricter requirements should help avoid new housing development at excessively high densities which result in overcrowded neighbourhoods and reduce their 'liveability'. Such measures are particularly important to avoid fuelling land value inflation by encouraging speculation and opportunism by developers.