

Draft London Plan Density

M39. 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 decisionmaker?

The policy is ineffective because its efficacy will only get tested properly through the production of supporting local authority plans. That will be too late to rectify any flaw with the policy.

We refer to our representations.

This Policy speaks to one of the central tensions in the DLP: the Mayor must drive-up the density of residential and mixed-use development to achieve his ambitious housing targets. He must do this because his assessment of capacity is largely theoretical: unlike a detailed local plan the Mayor does not know where a lot of the development sites will materialise.

However, pushing the density of development risks creating poor living environments. In order to safeguard against this, the Mayor requires a lot of local contextual studies of various sorts or codes to be completed first (density studies, tall buildings studies, design codes, historic environment character studies, etc). A great number of such studies are required by the DLP. Part 3A of the policy implies that local contextual studies will be been completed by the local authority in order to inform the 'site allocation'.

The Mayor also requires applicates to engage with his Design Review process (Policy D2) to avoid the construction of potentially poor developments. However, this runs the risk of significantly delaying projects as developers and local authorities try to resolve problems associated with building at much higher densities through 'design review' when this could be simplified by providing signals via London Plan policy.

Whether these studies can be completed in time, and whether the Design Review process will assist developers, is questionable. We doubt it. We also doubt the ability of the London LPAs to prepare up-dated local plans in time, as well as identify and allocate enough specific sites for housing to satisfy the requirements of the NPPF.

Essentially, the Mayor is off-loading a lot of hard work on the London LPAs who are tasked with trying to implement the Mayor's plan.

Part B of the policy requires the London LPAs, when preparing Development Plans, to follow the approach outlined in Part A. It is unclear, however, what Part A requires and who is responsible for discharging this part of the policy. Part A requires consideration to be given to

site context. Part B, by contrast, suggests that local contextual studies will have been completed to inform the capacity to site allocations.

The policy is very unclear.

This should be contrasted with the requirements of the NPPF. The NPPF requires the plan-maker to identify a housing land supply of specific sites or broad locations able to sustain delivery for the first ten years. The local authority, therefore, cannot escape its duty to identify residential locations and undertake some assessment of their capacity in order to provide the evidence to justify the local plan.

If the outcome of this work concludes that the local authority is unable to deliver the housing target in full because: a) it cannot locate enough specific deliverable sites; and/or b) contextual studies indicate that it is not possible to increase the density of development without having other harmful consequences, then this would indicate that the DLP is a flawed plan.

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?

This is unsound because it is ineffective.

Assessing density on a site-by-site basis provides no guarantee that 65,000dpa can be achieved.

We are not convinced that density can be assessed on a site-by-site basis, because we operate within a plan-led system. The English plan-led system, among other things, requires plan-makers to identify specific deliverable sites for housing for the first five years and specific developable sites or broad locations for years 6-10. If the Mayor is not going to provide guidance on density, then the local authority will have to prepare density studies of its local authority area to support its housing implementation strategy. The local authority will need to do this because it will need to know what densities will be tolerated in various locations in order to know the approximate capacity of its allocated sites. This is what Part 3A of the Policy implies.

Once all this work has been completed for London several years from now, then we may eventually discover that the capacity for new housing within the developed area of London is much less than has been estimated by the Mayor through his SHLAA back in 2017. But by then it will be too late to stop the London Plan juggernaut continuing on its course of failure.

Of course, we appreciate why the Mayor would wish to dispense with the Density Matrix. This is because, if it had been retained, it would have had to be amended to indicate that much higher densities were to be tolerated in traditional suburban locations (characterised typically by low-density housing of about 20-30 dwellings per hectare). This would have attracted the ire of the residents of outer London. The London boroughs, however, know that this is what they will have to contend with.

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