

Draft London Plan EiP 2019

London Borough of Bromley Written Statement

Matter 39

Density

Will 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?

Comment

Bromley considers that Policy D6 will not be effective in achieving the intentions of Policy GG2 for the following reasons. The Plan's approach to housing growth is focussed on a dramatic rise in the scale of small site development. The very nature of that development is that it is unpredictable and piecemeal, leading to cumulative impacts that cannot be addressed in the same way as larger and more comprehensive planned development. Policy D6(B) will therefore be difficult to assess and ineffective.

a) It is unclear how Policy D6 provides an effective strategic framework for Local Plan preparation, neither is it clear how a planning proposal could be assessed against it. The detailed criteria appear to contradict other London Plan policies, adding yet another layer of confusion for the decision maker, and other policies, particularly Policies D1 and D2 render it unnecessary.

The minor suggested changes at B (3A) and Paras 3.6.2 and 3.6.2A appears to attempt to refer to Local Plan allocations which have already been subject to assessment and consultation. Through the statutory process of Local Plan development, these already seek to "optimise" potential by balancing the benefits of development against potential harm to existing communities under the NPPF (2012) and the full range of relevant policy criteria. This modification suggests that a single criteria – infrastructure – be assessed and mitigated. It is unclear how this relates to Policy D2 (3A). Changing the adopted quanta of development through the planning application process risks removing certainty and could further delay delivery of these sites. It is unhelpful to infrastructure providers who have been engaged in the Local Plan process to be asked to commit to unplanned changes.

Strategic Policy GG2 states that “*those involved in planning and development*” must “understand what is valued about existing places and use this as a catalyst for growth renewal and place making”, yet the London Plan itself fails to do this. Despite setting out the elements of “good design” in Policy D1 and suggesting in Policy D2 that growth should be delivered in a way “*which strengthens what is valued in a place*”, Policy D6 overly concentrates on infrastructure as the “magic bullet” to creating optimal density. D2 states that boroughs should evaluate all of the elements listed, before determining capacity, not simply future infrastructure needs. Local Plan policies which reflect “what is valued” in a place include those for protecting garden land and the local distinctiveness of Areas of Special Residential Character. These have been developed legitimately through the development of the Local Plan and are consistent with national policy.

Bromley disagrees with the assumption in Para 3.6.1 that the most efficient use of land “will mean developing at densities above those of the surrounding area on most sites”. This assumption pre-empts work that the London Plan itself requires of Boroughs (set out in Policies D1 and D2) that is to assess their capacity for growth through a thorough evaluation of all relevant elements of the local area and its community. It is also notable in Para 3.6.1A that the Mayor “will provide further guidance on assessing site capacity and optimising density”. These statements lead to the question as to how the Mayor has come up with the housing numbers for the Boroughs in Policies H1 and H2. If it is indeed being left to the Boroughs to properly evaluate their own capacity for growth, based on “what is valued” how can the figures already have been calculated and be imposed?

b) Comparatively, the residential density Matrix in the London Plan provides a more suitable basis for discussions on site optimisation. Retaining a guide such as this is more preferable to the approach taken by Policy D6.

In conclusion, Policy D6 is ineffective and not justified. It would be difficult to assess the accordance of a proposal with the policy and equally how a Local Plan could be in conformity. It is unnecessary considering the presence of Policy D1, D2 and Borough’s own Local Plans, and should be deleted.