

London Plan Examination in Public – Written Statement

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Matter 39

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?

The Assembly supports the continued focus on ‘optimising’ density and would not wish to see any weakening of policy that led to inappropriate and unsustainable increases in density – or a return to a policy which focuses on ‘maximising’ density. However, the Assembly is of the view that Policy D6 would not be effective in achieving the intentions in Policy GG” and requires significant amendment, notably through the reinstatement and modification of the density matrix.

The matrix has provided a benchmark which has been used consistently by developers and local planning authorities and has provided a strategic framework for assessing density. It has also helped communities to understand the general levels of development density they could expect in their areas over time. Scrapping the matrix removes the strategic framework for assessing density and site capacity and would have implications for accommodating the level of growth that the Plan advocates.

The Planning Committee has historically been asking for a revised and updated density matrix. More recently, in relation to Draft London Plan Policies, the matter of managing London’s residential densities was examined in detail at the London Assembly Planning Committee meeting on 18 July 2018 and a planning Committee on Jan 22nd, when a number of experts and representatives from the London Boroughs were invited to attend a planning committee on the topic. The evidence presented at that meeting has informed the London Assembly’s response to Matter 39.¹

An SPG on a revised and updated density matrix (which more closely reflects current development pressures, and includes what is mentioned in b) below). This is to be

¹ Minutes of meeting of London Assembly Planning Committee 18 July 2018
<https://www.london.gov.uk/moderngov/ieListDocuments.aspx?CId=258&MId=6396&Ver=4>

accompanied by a London wide SPG on Character and Context, which guides the boroughs. These are to be consulted on and introduced in the first round of London Plan modifications/alterations. Meanwhile The density matrix in the existing London Plan should continue to be applied until a modified density matrix has been prepared.

The London Assembly recommends that the density matrix is restored and linked to Policy D6 in order to provide the necessary level of strategic policy guidance on the location of higher density development and the assessment of site capacity. It should be refined by adding a further dimension that addresses access to local services, amenities and social infrastructure and considerations of character and context. A refined matrix would serve its original purpose and fit more appropriately across the varied local character, accessibility and infrastructure provision found across London. The Mayor should prepare a London Plan Character and Context SPG to assist boroughs and local communities to come to an agreed view on local development density.

Further strategic policy guidance is required. The Mayor should draft an SPG setting out the components for the management plan required for higher density development (Policy D6 C) and the submission and assessment process. The Policy should make it explicit that planning frameworks for larger sites should set out the transport and social infrastructure requirements for the development, including community, open space and ancillary services and how neighbourhood impacts would be dealt with.

The Density Matrix has provided a benchmark which has assisted the Boroughs in assessing site capacity and in the determination of applications taking into account local conditions. Without the density matrix, there will be no benchmarks against which to test the suitability of a location for higher density development. This will lead to higher densities being proposed irrespective of whether the location is appropriate in terms of accessibility to public transport, local services, amenities and local social infrastructure. Furthermore, the absence of any robust benchmarks and the reliance on a 'design-led approach' could lead to a sub-optimal use of land in otherwise sustainable locations.

Sustainability of Development

Policy D6 seeks to optimise development regardless of location and by adopting a purely 'design led approach' fails to address issues of sustainability and the suitability of different locations to accommodate higher density development. The policy should identify locations where higher densities will be encouraged – places that are well-connected by public transport, walking and cycling to jobs, shops, education, health and amenities and well served by infrastructure and, finally to consider the capacity for development in relation to the sustainability of the location and its character and context. The approach adopted in Policy D6 could result in promoting higher density development in the wrong locations contrary to Good Growth objectives. The benefit of the existing density matrix is that it promotes higher densities in the most sustainable locations and as such provides a strategic planning framework for development.

Size Mix and how density is measured/making best use of land

We welcome the inclusion of bed spaces in the definition of density.

The Assembly welcomes the requirement set out in Policy D6 for density to be measured in a number of different ways in particular bed spaces as this links to the need to deliver a mix of unit sizes to meet housing needs. Indeed, it is important to recognise that making the best use of land does not have to be in the form of high density (in terms of number of units) or tall buildings but must be linked to other factors relating to access to necessary infrastructure, local needs and character and context. A high density scheme in terms of habitable rooms and bedspaces would look very different in design terms to a scheme comprising mainly 1 bed, studio and a small number of 2-bed units (with density measured in terms of number of units). It is important that this distinction is made in Policy D6.

Concerns with the Mayor's proposed approach

Policy D6 sets out a policy requirement to optimise density but then devolves this responsibility to the local level to deliver without any clear strategic guidance on how this is to be achieved. It also assumes that resources and capacity will be available at the local level to undertake the detailed capacity and design scrutiny required by Policy D6. Refer to D2A 1-11 evaluation of growth capacity - character assessments, area design codes, management plans, master plans etc.

The Assembly does not believe that the provisions of Policy D6 provides an effective strategic policy framework for optimising density. It provides very limited strategic guidance on the location of higher density development and it will be difficult to ensure that the criteria contained in the policy will be applied in a consistent way in development management. The Policy must be more specifically linked to the broad spectrum of Good Growth objectives including housing need, local character and place making, access to green space and social and physical infrastructure including but not limited to transport infrastructure. This is required in order to give confidence to local communities that development will respect and enhance local character and that the necessary social, transport and other infrastructure capacity will be available to accommodate it. The form of housing output should be determined primarily by an assessment of housing requirements and not by any assumption of built form or development. In other words, it is about planning to meet a range of housing needs having regard to the local context. The density policy has been revised over time to take into account the requirement for a range of homes in terms of size and a range of built form.

The Assembly will be tabling specific policy wording changes at the EiP session.

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?

The Assembly believes that the implications of the policy proposals in D6 of the draft London Plan need to be related intrinsically to our recommendations in relation to our written statement on matter 7:

- The Assembly believes that, overall, the Plan is strategic but there are a number of instances where the Plan no longer has London-wide policy frameworks and is requiring the boroughs to make their own interpretations on a number of strategic issues, for example tall buildings and residential density.
- The Plan does not give a strong enough steer at a strategic level to the cross-cutting and integrative nature of sustainable development, i.e. that it does not emphasise that social and environmental performance drives and is crucial to sustainable economic performance as, we believe, is the intention of policy GG2.

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?

The Assembly is concerned that the Draft London Plan removes any reference to the sustainable residential quality (density) matrix – although the Assembly accepts there is a case to be made for amending a matrix.

The Mayor’s justification for removal is that the density matrix is not being followed, 50 per cent of development is above the matrix maximum for its location, 25 per cent is double the maximum and 15 per cent is below the minimum, i.e. only 35 per cent of development is within the appropriate density matrix range.²

The fact that final density has been delivered above the matrix in 50 per cent of schemes does not necessarily provide an adequate justification for its abandonment. The density matrix, for all its faults, provided a useful starting point for understanding the most appropriate locations for high density development in relation to accessibility and local context.

The matrix also provided a tool for the community to understand the general levels of development density they could expect in their areas over time (see above). The Assembly believes that there are already ways in which the density matrix can be made to work more effectively using already available tools. Indeed, the Mayor’s own The Planning Committee has previously recommended that the Mayor should review the London Plan’s sustainable residential quality (density) 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.³ Advances in geographic information systems e.g. webcat⁴ – should allow appropriate density thresholds for any site in London. In November 2015 the Mayor commissioned a series of research projects to investigate different aspects of housing density to inform the full review of the London Plan. One of these studies (Ove Arup) points to the way a revised density matrix might work to manage

² GLA, ‘[The draft London Plan 2017: Topic paper Housing Density](#)’, 2017

³ London Assembly Planning Committee, ‘[Up or Out: A false choice: Options for London’s growth](#)’, January 2016, page 18

⁴ Transport for London, [WebCAT](#), 2018

residential densities more effectively.⁵ The Assembly believes this approach should be explored as a better way of managing density than the existing proposal to abandon the density matrix altogether.

Furthermore, TfL has worked with the GLA to identify additional measures that could help establish whether a location is suitable for higher density housing.⁶ TfL identified a list of connectivity measures that could be used to complement PTAL. This reflects people's primary needs:

- Access to jobs within 45 min by public transport
- Access to a rail station by walking
- Access to services (represented by walk distance to a town centre)

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https://www.london.gov.uk/sites/default/files/project_4_exploring_character_and_development_density.pdf

⁶ TfL Planning, '[Connectivity data to inform spatial planning – Exploratory Analysis](#)', 2016