



ORGANISATION	LONDON FIRST
ID	1588
MATTER	M39 DENSITY

M39. 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?

1. London First supports the overarching aim of this policy to optimise density and make the best use of land. Furthermore, London First supports the clarification, through the minor suggested changes in August 2018, that Policy D6 applies to all types of development, not just housing.
2. London First believes that the new strategic policy agenda for design-led density, through GG2, D2 and D6, will equip pro-growth boroughs with the framework in which to tailor Local Plan policies and site allocations that support the delivery of the Good Growth spatial strategy. However, London First has some concerns that those boroughs that are resistant to intensification and growth will be able to apply the policies – as currently worded – in a manner which does not optimise density in the way that the draft Plan envisages, and indeed is wholly dependent upon, if it is to deliver its housing and employment targets.
3. In this context, it is submitted that greater weight should be given to the following sentence by removing it from the supporting text at paragraph 3.6.1 and embedding it into the wording of Policy D6A:

“This will mean developing at densities above those of the surrounding area on most sites.”

4. Additionally, it would be helpful to reinforce the link between D6 and GG2 by including an explicit statement in D6A that sets a policy expectation for significantly higher densities in Opportunity Areas, sites that are well served by existing or planned public transport services, and sites within and on the edge of town centres.
5. Taking on board these two proposed changes, Policy D6A should be revised as follows:

*A Development must make the most efficient use of land and be designed at the optimum density. **This will mean developing at densities above those of the surrounding area on most sites.** The processes required by parts A and B of Policy D2 Delivering good design set out how a design-led approach will inform the evaluation of a site's context and help to identify its capacity for growth. Particular consideration should be given to the following evaluation criteria to determine optimal development density:*

- 1) *the site context, including surrounding built form, uses and character;*
- 2) ***the site's** connectivity and accessibility by walking, cycling, and existing and planned public transport **to jobs and services** (including **both PTAL and access to local services**);*
- 3) *the capacity of surrounding infrastructure (**see Part B**)*

Higher-density development should be delivered in Opportunity Areas, sites which are well served by existing or planned public transport services, and sites within and on the edge of town centres.

6. These changes to D6A would provide better safeguards to ensure that boroughs do not take an overly conservative approach in assessing the optimum density for a site or area, thus constraining that area's growth potential, particularly in relation to the delivery of the small sites target in the draft Plan.
7. Furthermore, in respect of the preparation of Local Plans and Neighbourhood Plans, London First has some concerns regarding the emphasis draft Policy D6 places on borough-wide assessments and site allocations, together with the requirement for local planning authorities to assess their density and infrastructure capacity (D6B and paragraphs 3.6.1A and 3.6.6). This assumes that the boroughs will have the resources to undertake this work, when a recent London Councils report, *London's Local Services: Investing in the Future* (London Councils, 2018), demonstrated that over the decade 2010 to 2020 London boroughs will have experienced a reduction of 63 per cent (over £4 billion) in real terms in core funding from central government. Therefore, some boroughs may not have adequate resources to do the extensive work required by the draft Plan, and this could undermine the delivery of the Good Growth policies including D6.

8. In terms of the second part of question (a) and whether the detailed criteria are justified and necessary, London First considers that parts C, D and E of D6 are overly prescriptive for a spatial development strategy and not necessary to deliver the objectives of GG2 and D6. Adding unnecessary complexity to the planning process increases the amount of time it takes to obtain planning permission in London, which, in turn, increases costs and risks undermining delivery.
9. In particular, D6D and D6E of the draft Plan require numerous measurements of density to be provided for planning applications. Providing the full list is unnecessary for the assessment of an application; AOD building heights should be annotated on application drawings as standard procedure in any event. Notwithstanding the above, such measurements should be at the discretion of the boroughs, and this list is unnecessary detail for a strategic policy in a spatial development strategy.
10. Finally, D6C sets out residential density benchmarks, whereby an applicant will be required to submit a management plan, and the scope suggested for management plans at paragraph 3.6.8 of the draft Plan includes details such as service charge costs for different users and details of day-to-day servicing and deliveries. London First is concerned that this information is unlikely to be available at the planning application stage. London First also questions the relevance of the service charge rate when considering the appropriate density of a development. The wording of D6C should be changed to reflect the fact that such information will not be available until later in the development process:

C *The higher the density... Development proposals that are referable to the Mayor must be subject to the particular design scrutiny requirements set out in part F of Policy D2 Delivering good design and those with a residential component must **submit commit to a S106 planning obligation to secure** a management plan if the proposed density is above...*

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. London First supports the removal of the density matrix from the Plan. Whilst it did provide some guidelines for applicants, it could also be a constraint and it lacked the sophistication required for assessing density on a London-wide basis. It was often disregarded in favour of a design-led approach, such as that now advocated by the draft Plan through policies D2 and D6. The density matrix had therefore become somewhat redundant.
2. However, as stated above in respect of (a), we consider that the draft Plan's policies, and D6 in particular, do not provide enough safeguards to ensure

that boroughs' development plan policies and guidance do not set conservative densities or implement design policies that fail to optimise the intensification opportunities that exist within London's existing built-up area. In the EiP Housing Technical Seminar on 6 November 2018, GLA Officers confirmed that the 2017 SHLAA assumes that densities in London will be delivered within the upper limits of the density matrix in the current Plan. Deletion of the density matrix without any safeguard in place to maintain these assumed density levels risks undermining the Good Growth strategy. For these reasons, London First recommends that minimum densities should be quoted in the Plan. This approach would be consistent with NPPF2 (paragraph 123), and thus the direction of travel for national policy, and it would prevent sub-optimal schemes being granted planning permission.

- 3.** In addition, London First would like to see further clarification in the Implementation Chapter on how the Mayor will intervene in the plan-making and decision-making process to ensure that borough-level policies and guidance deliver the level of growth the capital needs.