

The most basic problem with Policy D6 is its apparent aim of achieving maximum density in all situations, which reflects the weakness of the Good Growth policy as outlined earlier in the Plan. This emphasis is particularly inappropriate in a plan going so far into the future when recent 2017 ONS mid year estimates have shown lower rates of growth consistent with a slowing of population growth in London since 2016, as noted in the draft Hackney Plan LP33. I live in the borough of Hackney, hence this and other local references.

The emphasis on more building, more height, greater density, more intensification, has not helped to meet the needs of the majority of Londoners and has in fact made their lives harder.

Between 2014 and 2017 4,800 dwellings were built in Hackney. Yet only 15 percent fell even into the broad category of 'affordable' (much of which is in fact unaffordable to most Londoners). In the category of social rented housing there was actually a net loss of 71 (London Tenants' Federation analysis based on the London Plan Annual Monitoring Reports). House prices in Hackney have more than doubled over the past 10 years, rising 71 percent in the last five years; the average house price is 15.5 times the average earning of a household and the cost of renting has increased by over 30 per cent since 2011 (figures from current draft Hackney Plan LP33). This emphasis on cramming in as many dwellings as possible has not helped meet people's real housing needs. It has in fact attracted more investment in market housing, and driven up prices still further.

Your mention of the 'cumulative impact on the environment and infrastructure' is also well founded, reflected in Point 3.6.3A which raises the risk of an accumulation of 'minor developments' having a combined detrimental effect. Points like 3.6.1 'For London to accommodate the growth identified in this PlanThis will mean developing at densities above those of the surrounding area on most sites' raise just such fears.

a) D6 is likely to encourage what seems like a free-for-all currently reigning in planning in Hackney. Unfortunately basing decisions solely on design and not on objective criteria allows for a clash such as recently occurred over the Britannia Development Plan, where the consultants employed by the council (the developer) claimed their proposed tower blocks would be a 'statement' and form a clear edge to Shoreditch Park, whereas local objectors saw them as an eyesore and saw no reason for the park to require a clear edge. These are just such 'competing considerations' as are referred to in your question.

Part A outlines three 'evaluation criteria' for determining 'optimal development density', site context, connectivity and accessibility, and capacity of surrounding infrastructure. Unfortunately Policy D6 goes on to modify these criteria to such an extent as to make them largely meaningless.

For example, B1) says 'The density of development proposals should be based on, and linked to, the provision of future planned levels of infrastructure rather than existing levels'. Whose plans, how certain, how far ahead? B2) refers to 'the ability to support higher densities through encouraging increased levels of active travel' - this appears to allow low PTAL levels to be ignored. B3) suggests that if current infrastructure is insufficient, a development may be phased - but this means a dense development can still be started, and once started, how is it to be stopped?

I will give a Hackney example: the Britannia Development Plan, in a location with a PTAL of 2-4, with local bus cuts planned, will start in Phase 1 with a leisure centre, school and tower block with 'affordable' housing. Phase 2, with 388 market dwellings, will fund the earlier phase. How can they reasonably be separated?

This is also an example where the 'design-led' approach fails to meet requirements. So far the tower blocks with the 388 market flats exist only in outline (crystal clear shapes in both model and illustrations). The development has had planning approval, and indeed the approval of the Mayor of London, but no one is in a position to judge the design of its most essential, most visible and most prominent elements. This contradicts C 'The higher the density of a development, the greater the level of scrutiny that is required of its design' and makes it therefore seem unlikely that this proposal will be adhered to.

b) Leaving density to be assessed on a site-by-site basis is an entirely unsatisfactory and ineffective planning method and the density matrix in the 2011 London Plan should be reinstated. Standards based solely on a subjective category like design will not protect Londoners from the over-development of their areas, over-development which will worsen their living conditions by depriving them of space, daylight, sunlight and greenery.

Already the draft Hackney Plan currently under consultation says, relating to BRE guidance on daylight and sunlight: 'In denser urban contexts, sunlight and daylight levels may struggle to meet these target criteria in both existing and proposed situations. The target criteria will therefore be operated flexibly in relation to planning applications in dense urban locations such as that found in Hackney.' This leaves the public entirely at the mercy of the subjective decisions of planning officers on such an important matter.

The criteria for matters like density need to be tight and objective to protect the public.

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