

PARTICIPANT STATEMENT

RESPONDENT 3237

HIGHBURY GROUP ON HOUSING DELIVERY

M39. DENSITY

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?

We proposed the following amendments to policy D6

D6 Optimising Housing Density

1) Reinsert at beginning of D6 Policy 3.4A from existing London Plan, including Table 3.2 Density Matrix

2) Revise **suburban** ranges in matrix as follows:

Public Transport Accessibility Level (PTAL)

0 to 1 2 to 3 4 to 6

150–200 hr/ha 180–350 hr/ha 200–450 hr/ha

3.8–4.6 hr/unit 35–55 u/ha 40–80 u/ha 45–115 u/ha

3.1–3.7 hr/unit 40–65 u/ha 50–115 u/ha 55–130 u/ha

2.7–3.0 hr/unit 50–75 u/ha 60–130 u/ha 70–185 u/ha

(proposed increases relate to PTAL 2-3 and PTAL 4-6 and may need to be subject to refinement. Existing ranges for PTAL 0-1 are considered to be appropriate)

3) Expand D6C to specify minimum components of required management plan. This should include compliance with policies H5, H7 and H12 and all design standards, including internal and external space standards. Design scrutiny needs to explicitly include assessment of utilities, transport and social infrastructure including access to open space and leisure facilities.

M1 Monitoring Table 12.1 Key performance indicators and measures

Reinstate KPI 2 From existing London Plan. Optimise the Density of Residential Development: Over 95 per cent of development to comply with the housing density location and the density matrix.

The Mayor should draft an SPG setting out the components for the required management plan and the submission and assessment process and consult on the draft before a final SPG is adopted. There is a case for reintroducing Policy 3A.5 in the 2004 London Plan on *Large Residential Developments*, which required local planning authorities to prepare planning frameworks for sites of 10 hectares OR that would accommodate more than 500 dwellings, these frameworks to set out the transport and social infrastructure requirements for the development ,including community and ancillary services and how neighbourhood impacts would be dealt with

These amendments would reinsert the density matrix as a basis for ensuring that new developments met the principles of Sustainable Residential Quality. The matrix is amended to support intensification of suburban areas with Public transport Access of at least PTAL 2. The new policies for design scrutiny are retained, but to supplement rather than replace pre-existing density policy. The content of management plans for higher density schemes scrutiny are clarified as is the requirement for higher density schemes to be fully compliant with policy requirements on design as well as affordable housing and bedroom size mix. No changes are proposed to ranges for central and urban areas

Justification for proposed amendments

We are concerned that the adoption of a ‘design led approach’ as a replacement for the specific policies on Sustainable Residential Quality contained in previous versions of the London Plan will not necessarily increase the output of new homes to meet the challenges of London’s population growth, and will not ensure that the new housing supply produced is appropriate to meet the full range of the housing needs of Londoners. Design is one of the tools to meet planning requirements but should come after the definition of preferred locations for higher density development and an assessment of the need for different types of development. A focus on ‘good design’ without clear design guidelines cannot be a substitute for setting explicit planning policy requirements. If policy D6 remains, the intended content of a management plan this should be spelt out more fully. This should include consideration of all the components set out in Policy 3A.5 on Large Residential Developments in the 2004 London Plan.

While there is a case for amendments to be made to the density policy, a set out above, we do not support the removal from the Plan of the density matrix or the removal of the density compliance Performance Indicator. The matrix, which set out appropriate ranges for density of new development in terms of both dwellings per hectare and habitable rooms per hectare relating to a) public transport access; b) the existing built form within an area and c) the relationship to a town or district centre. This has been an important tool in ensuring development density was optimised without compromising sustainable residential quality objectives and which provided a starting point for negotiations between developers and borough planning officers. While there is a case for reviewing the density ranges in the matrix, especially in relation to suburban sites with good public transport access and access to good social infrastructure, there is also a case for more explicit guidance on criteria for deviations from the appropriate range as abandoning the key policy control of development density is likely to facilitate further inappropriate development. This policy shift fails to acknowledge the relationship between development density and the type of new development output, in terms of built form, bedroom size mix and affordability. The facilitation of higher density development also has an impact on land costs, which then has a negative impact on housing

affordability. It is important that maximum permitted densities can simply and transparently be read off the plan and its policies to discourage those bidding for sites from over-bidding and then using viability arguments to secure higher densities or reductions in affordable housing provision. The market's need for certainty in respect of density is logically the same as its need for certainty about affordable housing requirements. The draft Plan adopts this logic for affordable housing (Policy 4.6.13) and should do so for density.

There needs to be adequate mechanisms for ensuring higher density development meet the full policy requirements set out in the Plan in relation to the built form, dwelling type, dwelling size mix, housing affordability, internal and external space standards and design standards in accordance with the principle of sustainable residential quality. This requires amendments to the draft plan policies and supplementary guidance, not just related to development and housing policies but also expanded guidance on delivery mechanisms and safeguards for private sector development set out chapter 11. We emphasise that we support improved design but there is nothing in the Density/SRQ matrix which inhibits good design within the parameters set. They are not alternatives. The evidence that the matrix has never been enforced and has had little detectable influence is used by the Mayor as an argument for scrapping it. In our view it is evidence of the importance of enforcing it as firm policy as we propose.

The reinsertion of KPI 2 would ensure continued monitoring of density compliance and identify the proportion of new developments, which are either below or above the appropriate density ranges. The Mayor should continue to publish maps of density compliance and identify specific non-compliant schemes, and the justification for approving or supporting schemes outside the appropriate ranges.

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?

They would not be effective, for the reasons set out 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?

Yes. Subject to the proposed revision to the density matrix set out above.