

# A CITY FOR ALL LONDONERS

Housing Workshop  
21st November 2016, 9.30 – 13.00

## Residential density Table 6 Session 1

**Facilitator in bold facilitator – comments in bold**

Respondents in regular text

These notes are a summary of the conversation

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*Session 1, Table 6*

### **Facilitator, Elliot Kemp, Greater London Authority**

Colin Wilson, Greater London Authority

CLlr Sem Moema, Hackney Council

David Morris, London Borough of Newham

Michael Bach, London Forum of Amenity & Civic Societies

Ian Gordon, London School of Economics

Ian Butcher, London Borough of Redbridge

Andrew Jones, AECOM

David Boardman, Kennington, Oval & Vauxhall Forum Planning Group

Katharine Fletcher, Historic London

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### **The question is how should the London Plan ensure that the optimum amount of housing is delivered on a site or area?**

Can I not answer that question? The densities you're actually getting on sites comes from some kind of an interaction between the market, reaching across the pressures, the demands, the decisions of a lot of different companies, and end up not having a lot to do with councils.

People will take whatever they're allowed to get: although the Density Matrix provides a great, wide range, developers will always go for the top of the range. It means they don't actually fully refine within that range according to circumstances locally. Going for the top isn't a problem if it's appropriate, but it should be exceptional and justified.

Part of the discussion should be about the "optimum" part. Having a maximum doesn't necessarily mean hitting standards. If it's about the optimum, it needs to be for the right site. So then the argument becomes: how do you assess the right site? Density guidelines and standards make a good starting point, but if London's going to deliver, it's going to take careful design, work with communities, etc. The conclusion we need to come to is about what is a good *quality* scheme?

The majority of development has been approved and is taking place above the maximum levels. 50% has been consistently over the maximum. There's little evidence that what is in the Matrix has made any substantial impact on it.

The Matrix was originally made to drive up densities (which it has done effectively). Things have now run away with it because people don't take the *range*.

Densities went up before the first plan, in response to green field quotas.

Acceleration was taking place while the plan was already being made, but it peaked about 2007, then it goes down and evens out on a plateau of about 50 homes per hectare.

Has the Matrix helped?

Yes.

Why have the numbers not gone up then?

The market. It's encouraged to go as high as they can. The Matrix has legitimised higher densities.

The Matrix doesn't deliver housing. The house-builders build the houses, not the Matrix.

There's always been density standards, but making the recent one, and stepping it up, has given the development community the "tick". Yes, we're being smart in our use of land, but getting the right solution for places isn't just a check. It's a good starting place.

That's done by the market. The actual densities relate much more subtly. The smart use of land is mostly not to use it. High density is a response to shortage. Densities have gone up 150% but housing has not increased.

It's interesting to look at the density of unimplemented permissions. A policy which has encouraged people to seek permissions with very high densities, because it's increased their book value. It's done London no good: it's done harm.

It's about connecting permissions to a delivery plan; otherwise it'll just sit there. While it's better value to hold onto a site for five years than build; that's what they'll do.

We have to be very realistic about the densities that get implemented. But it's a waste with the ones that don't.

It's the completed ones that have gone up by 150%.

You only know about the ones that have been completed at higher density, but not the ones that haven't been completed.

We know the density that's approved by the Borough.

It'd be interesting to look at what the unbuilt city might look like.

**What sort of factors would guide density - whether it's higher or lower - if we were making a policy?**

What are the main things? Location in relation to public transport, capacity of public transport and also the setting. What other things have we left out of the Matrix which could guide policy? There are a few. Market prices go down according to distance from public transport stations; likewise the ability to support higher density as you go away goes down. The Matrix has got the basic ingredients, but the main thing is using it as a way to position developments within that range, use it as a bargaining tool.

Perhaps we can look at things from the other end of the spectrum. *If* we are trying to get the most out of sites, *part* of the equation is density. The more Londoners we need to accommodate on land, inevitably that means a higher density London. Do we need to look back at what sort of places we are seeking to create? In the 1950s, there were road schemes - civic promoted schemes - which came because "modernity is good and right for London" but now we say, "Density is good and right for London", and have ended up with whole swathes of citizens previously accommodated in two or three-storey, semi-detached houses and low-rise housing, then thrown into a block of high-rise apartments saying, 'Thank god we've got a flat at last.' Hackney has traditional terraced London homes, but we run the risk of making the same mistakes as before. Let's focus where we do want to go for enhanced densities on the scale of site where you're not immediately impacting on local communities. Transport infrastructure should be planned at the same time as the residential. There should be greater focus on a smaller number of sites on which the scale could drive the quality.

Think about what kind of London do Londoners want. Don't use mechanisms driving up densities. This document suggests we've got to be sensitive to making a positive contribution to local communities, other than just *not* harming things too much. If we're going to try and drive up densities we've got to ask what kind of a place we're trying to get. We don't want the randomness we get by encouraging people to go for a very high density.

Hackney doesn't have lots of spare land; a lot of development will be on infill and medium-sized sites. The residential is in beautiful streets, but we need a balance for neighbours who don't want to go from three-storey to five-storey buildings. There needs to be an education process, with regard to existing communities and we need to be asking what benefit comes from extra housing that isn't just *having* more housing. We need to let go of some of the...we don't want to *conserve* what exists, but that will need to change. Conserving character doesn't mean just making a modern version of what's there already. It's difficult to balance those two.

In Vauxhall, we are developing a neighbourhood plan. To beat housing targets you'll have small sites, developers see that as "gloves off". As soon as you get over nine storeys, you're into the territory of "That Iconic Look", £1,000 per square foot, "Astonishing Views" territory. St George's Tower is a prime example. That weighs in at 0.3 people per unit. Even while procuring 210 units towards the London Plan mandate target. Pushing heights up is creating accommodation that isn't meeting the housing needs of London, but developers from Malaysia. We've ended up with opportunity areas where they don't meet the height requirements. They've gone beyond density requirements. Out of 30,000 square meters of employment floors, we get back maybe 5,000 for cafes. It's not a fair trade for the community. Developers expect someone else to provide the public space, amenities. We need master plans that do have public squares, D1 and D2 units.

Having a maximum density is a mistake. Maximum density should be set on a local basis, not as part of the strategic plan. It should set quality. Encourage a reasonable London-wide interest in trying to push densities higher.

Some Boroughs today are producing an average of less than 30. I don't agree to not having a maximum. If you say build up to [here], the people do it, but you're reducing the variation for design. The lower the density, the better chance you have of a more varied design. Very high and tall buildings are just filling the envelope. They're not productive.

### **What are those important parts of design that make it crucial to a successful development?**

If you go to UTL, they say get rid of the Matrix, do it by design. But design is not the best tool. Density provides framework in which you can operate.

It has become open-ended. It has to be set, bargaining with local planners.

But they've got nothing to bargain with.

What if you have a plan? A plan that you can understand, as a planner, as a developer. Make a plan is what you should do in the future. Instead of a rather mysterious local plan, have a realistic, workable plan.

The five year target cumulatively puts councils and developers under the cosh. Maybe some other aspects should have a five year plan. You run out of time, and you're saying we need community space.

Add this to list of requirements for high-density schemes?

The presumption should be, if you haven't got it, you've got to provide it. 'Sorry, you've reached the quota for high-rises, now you have to produce something else, community friendly.' Community space, or workable space.

What kind of place are we creating? That needs to be focused on. Larger areas have the potential to create something with the right kind of facilities that responds to the requirements. So focus on larger spaces.

What will the London Plan be contributing?

It provides a standard. Whatever's in our local plan has to go with the London Plan. There's an objective measure. In my ward, Clapton, we're trying to get people concentrating on the need to shape the neighbourhood. To ensure that people can move to one of two neighbourhoods. Shoreditch is very dense and mostly just a giant housing estate. If we're going to build something modern and new, whatever's built in Shoreditch should be of a similar standard to what is in De Beauvoir. If there wasn't a London Plan, developers would squeeze in more units (inappropriate sized) into Shoreditch. In De Beauvoir you'd have crazily high densities which would become unliveable very quickly.

So, is the London Plan a safety net?

Yes.

In a Redbridge context, the decision to go high density has been made. We're following the Mayor. It helps people facilitate. We can say, 'Our maximum high-rise has been made; now we're following on from that.' The London Plan justifies difficult decisions about high-rises and high density accommodation. It makes it easier to explain in the Borough, to residents.

We have conservation areas and opportunity areas. What about having other areas like an Amenity Improvement Area. Development here should emphasise XYZ. We need the London Plan to identify concept. A local plan would not be proof. "Humanisation" areas maybe? We have standard rules and development must be in accordance with the development plan, but finding a development plan is considered one more material consideration. Developers are pushing the envelope wherever they can.

Suburban intensification would be almost impossible through a local plan, but a London Plan allows that conversation to be had. It creates new vision for an area. The London Plan picks up those concerns and moves them into the conversation.

I would say, maybe in our case, it's helpful, because it means you can curtail conversations about just annoying planning things. Redbridge and Hackney, are different kinds of places, but similar in some ways. Because it's a residential, low-density place, a local plan means people can talk about protecting, about green plans. We can talk about things that are missing. If we have X units coming in, where are people going to go to the doctor? It allows us to move away from just throwing up a tower, we have to have a conversation about something else.

### **Would you expect the GLA to produce guidance on something else?**

Most normal people don't understand what's going on, but a planner from the GLA can come and help to explain. Once people understand the plan, they can see what limits they want to push or impose.

I think, what it implies is a need for plans that are clearer. Local plans and London plans aren't clear. I struggle with the London Plan. I think, culturally, within "planning", we don't see many *plans*. When we engage local people there's never an explanation about cumulative impact. I'd say it's the local plan and the London Plan that should inform each other; have a conversation at all levels.

There's lots of policies, but not much planning. Planning has turned into a series of yes or no gates, ending up with a sub-optimum solution. Is it worth focusing on a number of strategic areas that will shift London, focused on by the London Plan? Drive growth across the whole mass. There are some mechanisms in the London Plan that create a framework for smaller local plans. Take principles into local plans. Pushing up to where the GLA can help. Taking away some of the stress around the planning process.

There's a leadership role the GLA can take. If you have a clearer London plan, it encourages local plans that are clear.

You get pressures on rules. There are provisions that everyone respects generally. Minimum standards seem workable, but on density, it's different.

How do you make plans clearer?

Having some actual plans. Physical layouts. A continuum from London Plan to local. In the London Plan, you'd have a thumbnail sketch of green spaces etc. Invite local planners to look at the thumbnail and complete it. The GLA needs to provide help for local planners and illustrate how they can sketch that out. People might turn up to a debate if they can see in a document what they're being asked to support.

GLA needs to make demands on developers. How can you best solve the demands being made? Make suggestions as to ways you might think about doing this.

Are you suggesting an SPG that suggests examples as to how to increase densities?

The objection to the Density Matrix is that it's not a set of physical plans that have any actual relation to the real world.

### **What are we saying about creating places? We don't flesh out what that means.**

Place-making is a massively under-explored area. In plan-making, place-making is a new concept. The London Plan is perhaps not the place to unpack that. But if we did, we could give something more meaningful to communities, how to actually plan for the people that live there and how to create sustainable communities. Place-making is completely missing from the London Plan, when it needs to be taking leadership.

The Density Matrix is what the current context is. It doesn't apply to what you're trying to get to in the future. If you take Outer London and want to intensify a suburban area in ten years, the Matrix has to say: this is what that means in ten years, compared to today. It should state what place-making is, what people want.

Unless you accept a shift towards less-travelling employment; how something like broadband is going to affect that.

That's not in the London Plan, broadband. It's not talking about.

On the place-making point, I think the issue of place-making is relative to the area you are in, as opposed to a mechanistic application of going upwards. Is there a mechanism where the London Plan can set an aspiration for a local plan, where it's based on principles set out in London Plan?

Rather than having policy about place-making, there's nothing to stop the London Plan from saying: Kingsbury, Brent; on a tube line, one half is a lovely, suburban 30s development, the other half has a giant supermarket and its car-parks. Put next to it metropolitan overland, identify the enhancement and protection of the suburbs. But also see what can be done with the other area.

TFL assets should be looked at for supporting residential development.

The current London Plan doesn't have a map of that size. There should be general policy on specific places. Eg. In North London: here are some nice places. Have it identify some areas.

Neither policy makes any reference to the places being created. It's suggested in *A City for All Londoners*. How to make a positive contribution? Actually talk about fitting in higher-density, taller buildings. It's up to the Borough to suggest how to do it.

Local character policy can be looked at. We see better policy in Historic England, design-led priorities. It's not a problem seeing that for historic concerns but there's a need to spread that out.

Local planning authorities. They're limited in sway and can't say much for fear of upsetting people. If you don't put it in a plan, people get upset when you start suggesting things. The

London Plan could be a bit clearer about what it was in places that helped promote density growth.

You can't start putting site proposals in the London Plan, but can help people to understand how to fit high-density planning in. It helps people to understand what they're looking at, so as to avoid a knee-jerk reaction.

Are we looping back to Urban Renaissance talks from the Nineties? Is it a best practice guide that we need?

Back then, we were helping people visualise what it actually means.

**We need to agree on three points. I think: we're improving high-density rates, but not providing what we want from the Matrix. We need to give more guidance on place-making; there's a bit more indication that could flow through for local planners.**

"De-British-ise" the Matrix. It's a seductively clear set of flags that doesn't actually implement anything.

The Matrix has a very broad range. If you think it needs changing, you have to indicate what way. Abandoning the Matrix becomes a free for all.

I want to abandon it and have a subtler system. About 55% over the top. The Mayor should encourage inspectors.

# Residential design quality standards

## Table 6 Session 2

**Facilitator in bold facilitator – comments in bold**  
**Respondents in regular text**

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*Session 2, Table 6*

### **Facilitator, Elliot Kemp, Greater London Authority**

Oliver Jefferson, Turley

Andy Shipley, Aspire

Corinne Swain, Arup

Chloe Horne, Old Oak Common & Park Royal Development Corporation

Duncan Bowie, University of Westminster

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### **Question: How should the London Plan ensure that the optimum amount of housing is being built on a certain area?**

The London Plan can't do it all. Any negotiation has to be done by the Boroughs. We need to get the two working together. Also, the sub-text of the question is should we have a matrix at all or a more qualitative measurement?

What do you mean by "optimum"? It's what kind of housing outputs we're looking for. It's necessary to get a range - a mix - of housing; which we're not delivering. To be sustainable, it needs to relate density to a range of factors. The matrix was introduced as a way of measuring density development against a complex range of factors. It's never simple, there's always a range, but we've lost a sense of quality. Developers are breaching all the criteria, which has raised the issue of replacing the matrix. We need to be careful about focusing outputs, not forcing inappropriate development, just to achieve a numerical objective. There is a long history of plans based on extreme densification, but we need to determine: what is a density policy for? Rather than it being the solution.

In Old Oak, we've got to deliver 50% family-friendly housing. If we're providing that, how do we also install quality high-density housing? High density areas aren't occupied by families, but rather, sharers and bought-to-let.

My response to the question was, do we need a question more about appropriate development?

It's not just the amount. That's the problem.

It's the use of development appropriately.

**So, if the GLA were to highlight what is appropriate, what would that be?**



Access to public transport and place-making. The idea to move away from units per hectare to people (density) is to make it about people, not units. Internal Space Standards was introduced to the London Plan. We've got to think of the knock-on effect. There's not explicitly any affordable definition. Making houses affordable. Dealing with complexities, if you deal with numbers, you miss the point that density policy is a *means* to an end.

Council planning often confuses those two things. Policy is written around those numbers. Developers need to have density's relation to quality clarified for them.

Is there a matrix function at the lower end of spectrum? Places that are far from public transport, places like Bromley. Does it provide a starting point for negotiations? For those Boroughs to get an *appropriate* form of development. Not encouraging dense, flatted development everywhere.

I appreciate the JLA's aims. But local politician pressure comes into play.

The London Plan's Density Policy *is* specific. Local Planners should implement this policy. Most local planners haven't done it. The character map is left to local planners. The Mayor has intervened under previous regimes to overrule local authorities who are applying the Density Policy too rigidly. Justifying schemes four or five times the top of the range. The issue is having guidance (including the numbers), but being much clearer. The Mayor has been worst at applying the London Plan on affordable housing. When it becomes purely a chase for numbers, the Density Policy, does not necessarily produce more affordable housing,

### **At a strategic level, what are the important things (in design and management terms)?**

Holding the line on minimum space standards. When it's difficult, is when it's on a tight site, going for high density, there's no space left to comply with habitable space standards. It reduces the quality of housing.

If you remove the Density Policy, every other standard tells you if it's a quality development: height; internal space; privacy outlooks; daylight; traffic impact; they are dealt with. Is there a benefit to starting with a number, and assessing quality in a holistic manner? Start from the opposite of what you got?

Density can be used as a shorthand. The danger is developers not meeting all those other standards. If you're doing quantitative stuff, you've got to meet those qualitative standards as well. It's easy to achieve 1,100 habitable rooms per hectare if they're all one-beds, not meeting the quality standards. To find a scheme is a mix of the requirements. Three quarters of schemes are not meeting housing requirements, so something's wrong.

Somehow the council has made an error?

They've disregarded the policies. The Density Policy is there for good reason. As soon as you lose the Density Policy, those other standards go by the wayside. They could be more explicit. Introduce a further series of policies, schemes not being totally disproportionate to the neighbourhood character. There are so many schemes that don't combine with neighbourhood character, treating previous development as, by definition, sustainable. The nature is shifting and not being managed. Character does shift. The Density Policy was one way of managing things.

So far, we've only approved one planning application, but we're developing our own policy on densification. Looking at the OPC area. Having different densities in different parts of the area. We want to maintain sensitive edges; more in keeping with the surrounding area. We need to think about how to make that sustainable. Trying to say, 'we'll have quite clear policies about what we think is the appropriate level of development'. Are we providing a mixture of homes in doing that? Our outcome will be on a mapped basis, that's where we're trying to get to.

On a Brown Field Site you can disregard the sense of an area's character. Major Brown Field defines its own neighbourhood character. That's a position City Hall has taken. In the context of a High Density Zone you're putting Canary Wharf levels of density into an area with no pre-existing infrastructure.

We want to get the best design possible. In early sites, we don't want to set precedent that we're going to hold down the future.

Is that driven by townscaping, having a master plan for the area?

Well, we have mini-master plans. We're trying to create distinctive neighbourhood plans. We've got to deliver 25,000 homes and public space is at a premium, so where can we develop a neighbourhood suitable to families? We're trying to deliver distinct neighbourhoods, so when developers come forward we have something to hold that against.

But you started with a target of 25,000 homes that was delivered from on high. Targets drive the housing design output. The difficulty is starting with a series of parameters that challenge your attempt to meet standards. That's what makes it problematic.

Those drivers then rub up against a climate of accessibility. They become more challenging when trying to deliver targets on sites. There needs to be more work done to enable those that need them to access it. Principles still apply, but when you start from high-density figures, you're immediately posing a challenge to accessibility and internal circulation. Design and orientation. Within the open master plan you have to squeeze capacity to create long term sustainability. A qualitative set of indicators as opposed to something just numerical.

### **How can the London Plan do that?**

Turn down any application that doesn't comply. The housing standards have remained in London, despite the government scrapping them. Even considering allowing an application that doesn't abide by them should be inconceivable. 'See what happens if you build homes inappropriate to living standards.' I don't understand why long term economic thinking is based on commercial scenarios.

There's a lot of public sector land that's been transferred to corporations.

They need to sell that land to fund public transport. It's great if you get some of that land to be used as housing development. Sadiq's got a direct conflict between different policy objectives. Unless you can find investment up front, but there's no source for that.

Can I bring up car parking? It sounds banal, but it's another function for the matrix: to provide an upper limit on car parking standards. If that was lost, in policy you'd need information about promoting car-free housing, controlled parking zones, to go with any density development likely to have overspill implications.

Height is useful. If you have a density policy, it has to have a clear goal aside from the politics of assessment. You need to try and identify the key *point* of the policy.

There's no policy in the London Plan on height. Other than general areas, town centres etc. The issue of height is always about townscape. But is it not the best way to utilise appropriate land use, as density increases. It's not just about townscape. But a height policy is not a surrogate for policy on density. But you don't get higher density without height. If we're encouraging densification, what levels are we encouraging? People need guidance on application, rather than free-form. We need the right questions to be asked about sustainability, access, amenities. It's not policed.

Taller units need to maintain a level of accessibility for disabled people. To get to local amenities, they need to traverse a lot of floors.

There was a perspective that putting the elderly on higher floors gave them a view and they were less likely to leave their home as much, but there needs to be access to a range, rather than just assuming they won't leave.

Public realm, public space. Can you have a dense environment that is also a nice environment to be in, to walk around in?

There's an environmental effect that needs to be noted by higher density development. Previous Mayors have been concerned. Density development has doubled in a decade but when you end up with large parts of Central London in permanent darkness, or streets becoming wind tunnels, you're looking at high-rise development that overshadows environmental aspects. We need to be more thoughtful.

There is a BRE test, in theory, if it meets those tests...

But I don't know if these tests are being done. There are a number of schemes where that hasn't been applied. Application is important. Spending time putting clear guidance on sustainability but there is continuing disregard for this guidance.

Policy needs to be started with that being applied. It needs to be clear what policy is trying to achieve. Not just something like the density matrix.

What about an SPG on density?

We think that's going on in the housing market.

There are opportunities in these developments, for things like rain water collecting. But you know a developer will just offer a roof-garden or water butts. It's about resisting offsetting; finding ways to reduce abilities to offset.

### **Is the matrix still fit for purpose or does it need to be refined?**

My own view is it needs modifying. The principle is there, but it needs modifying. There needs to be a more sophisticated look: so, it's not just about public transport consideration, but *where* are the bus stops going to be? Social infrastructure needs to be looked at and considered. The nature of social infrastructure shifts when density goes up. Developers will do a deal with TFL for a bus station, so they can go to the top of the 4 to 6 range.

Is that necessarily a bad thing, if they've got a new bus station?

Well, no, but it's the jump. The degree to which they can jump into a different density band. They can increase the number of units without increasing the quality of units. There's a game being played.

But there would be more games if we didn't have numerical units.

There was our mapping from 2003. It should have been included in the London Plan.

I thought maybe a series of GIS layers with these kinds of things - public space aspects - on it. Is there another layer to it?

In terms of local context, post density on site to density in areas. See the appropriate use of townscaping.

There's a requirement in the London Plan which says development of over 5 hectares needs to have a fully demonstrated social infrastructure plan. Everything needs to be planned. But nobody ever does it. I've never seen it in an application to the Mayor, even though it's been in there since 2004. Nobody asks any questions.

That's the purpose of having Borough-level assessment. It's difficult to put into practice from above that level.

If you identify social infrastructure short form - possible under Civil Section 106 - you're pitting the Borough against the wider city. It might be good to look at good and bad practice examples of high density, to see where policies have been breached. What's causing the problem?

There's a lot of research on density development towards the top of the range but the range is incredibly wide. The issue is it doesn't include family housing full stop. If you focus on units instead of habitable rooms. Density should not drive the housing mix. That's why there was a shift from units to rooms in 2006.

**Density is one of the outputs, but quality and criteria are more important – they have been missed out. We need to pay more attention to the design of internal amenity bases.**

Development program...there was research done in 2008. Historically, there's good evidence that densification has reduced qualitative output. What's the purpose then? Will it lead to more diversification of housing?

Do we think the matrix is useful? I do.

It's a useful starting point, but it'd also be useful to explain in the next SPG how we define quality development in hyper-density schemes. What are the must haves? Then we can get to point where it's not just about the numbers driving how high your building goes. It's qualitative.

There's the Isle of Dogs dilemma: writing off developments as foreign investment schemes. I'm not advocating it, but you can allow a proportion of non-viable schemes to go through in order to make the money – it's a pragmatic approach. It has negative consequences for the people

living nearby, but it's a strategy which in theory could be used. But it causes massive social polarisation. We don't want a London Plan policy that promotes that more than it already is.

Density policy is a means to an end. We have to be very clear about what that end is.

The tipping point comes: it's nice to have a few green fields, but if you can't get to them for the dystopian development you're in...

The policy on density needs to be clear on why it isn't just a numerical illustration of the rest of the London Plan. The purpose of the policy is what you're trying to have as the outcome. We need to make sure these are qualitatively defined.

The London Plan needs to be *enforced* more.

[End of session]