

STRATEGIC PLANNING IN LONDON AND WIDER SOUTH EAST RESEARCH NETWORK

Response to Draft London Plan

1. Our main concern is 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 should be spelt out more fully.

2. While there is a case for amendments to be made to the density policy, 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, which related to a) public transport access; b) the existing built form within an area and c) the relationship

to a town or district centre, was 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, and a case for more explicit guidance on criteria for deviations from the appropriate range, 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. There needs to be adequate mechanism for ensuring higher density development meet the full policy requirements set out in the Plan in relation to 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.

3. We welcome the focus on collaborative planning with the wider South East. We are however concerned at the figures presented in relation to London's housing requirements and housing capacity imply that London can meet its housing needs within the administrative London boundary and that the 'compact city' approach incorporated in the London Plan since 2004 is still viable despite the higher projected population growth. The Plan and the Strategic Housing land availability assessment do not however consider whether the densification approach will ensure that an appropriate range of housing outputs will be delivered, rather than solely the numerical unit target. Moreover, on the basis of past completion rates, we would question whether the proposed completions target of 65,000 homes a year is likely to be deliverable within the London administrative boundary. While we support the concept of growth corridors, we do not consider that the Plan has adequately reviewed alternative development options in relation to both quantitative and qualitative outputs, despite the comparison of strategy options in the Integrated Impact Assessment.

4. Consideration of growth areas within the Wider South East should be undertaken on a consistent and systematic basis and should not be limited to either the Cambridge/Milton Keynes/Oxford arc or to the growth corridors included in the London plan key diagram. There is a need for an agreement

with the representatives of Home Counties planning authorities on the criteria for selection of such areas across the wider South east on a consistent basis, also taking account of economic linkages and potential within the city region. Given the current governance frameworks, this requires the involvement of central government. There needs to be a full assessment of the development needs and development capacity of the London metropolitan region and a basis for setting targets for housing and other development across the region as a whole on a consistent basis.

Note: This response was agreed following a meeting attended by the following:

Duncan Bowie (Convener), Vincent Goodstadt (Common Futures Network), Corinne Swain (ARUP), Michael Edwards (UCL/Just Space), Martin Simmons, Paul Honeybone (UCL), Ian Gordon (LSE), Tim Marshall (Oxford Brookes), Nick Falk (URBED), Judith Ryser (ISOCARP), Ian Wray (University of Liverpool), Neil Sinden (CPRE), Michael Bach (Forum of London Civic and Amenities Societies), John Lett, Matthew Daley (GLA)

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