Written Submission from LSE London (London School of Economics, ID845) on Matter 39 for consideration in the Examination in Public of the New London Plan, 2019

1. Introduction

We did not ask to participate directly in discussion of this Matter – about the formulation and implementation of policies to assure the 'optimum density' of residential developments in particular contexts within London – because we are generally supportive of the direction of change introduced by the NLP, and do not have the relevant expertise to evaluate the ways in which that is supposed to be implemented locally.

We are aware, however, of objections made by others to the direction of change – specifically the removal from this Plan of the density/Sustainable Residential Quality matrix used in its predecessors – and wish to rebut these. In doing so we have an interest - as authors of two of the Density Research reports commissioned by the Plan team, one of which recommended removal of the matrix, or at least of the explicit setting of maximum density levels for each of a number of types of area within London. We therefore wish to ensure that the relevant evidence is taken fully into account.

Because the clearest (and simplest) part of the proposed changes embodied in the draft NLP's Optimum Density Policy (D6) is the removal of the old matrix, the remainder of our submission starts with the second of the Panel's questions, about whether 'leaving density to be assessed on a site-by-site basis' will be as effective as using the matrix'. We then turn (briefly) to the its first question, about the proposed ways in which that site-by-site assessment should now be carried out.

2. The Likely Effect of Removing the Density Matrix for Achievement of Optimum Densities of Development

A starting observation is that the notion of achieving optimum densities is a slightly odd one, in two respects:

- why refer to a search for optima in just this aspect of the Plan? and
- why focus specifically on the optimum density of development, when this provides only one partial indicator of the form that a specific scheme should take to achieve overall objectives.

The reasons for this particular language and focus reflect some very important tensions and problems in this aspect of London Plans. All of the Mayoral Plans (including this one) have embodied 'a compact city' strategy, involving London accommodating a substantial projected growth in population within its borders, without recourse to Green Belt/MoS land, or to planned development elsewhere in the WSE. This is justified largely in environmental terms, including potential avoidance of increased carbon emissions from car-borne personal travel, as well as savings of greenfield land.

The language was thus initially (in the 2004 Plan) one of *maximising* densities, toned down to one of 'optimising' densities in the face of objections of various kinds. The seemingly technical notion of optimisation never actually had an analytic basis – and still does not have such a basis. It simply reflects a compromise between competing considerations, of which the only ones to be at all formalised were those relating to levels of access to the city's public transport network (measured in PTALs)

The old/iconic London Plan density matrix rather crudely divided up neighbourhoods in London into a few categories on the basis of two three-way categorisations of areas, relating to:

- high/medium/low levels of public transport access (PTAL values); and
- central/urban/suburban character, in terms particularly of proximity to larger/smaller service centres.

In principle this gave 9 categories of areas, though most fell within a smaller sub-set, since central areas won't normally have low PTAL values nor suburban ones very high ones. For each of these very broad types of area, an acceptable range of residential densities was defined (with maximum and minimum values). These ranges were naturally very broad, because of the diverse sets of areas to which they were to be applied and now to the use of dwellings rather than habitable rooms.

The basis for the ranges as originally defined was not an analysis of the impacts and acceptability of real schemes which had been proposed, but rather a small number of outline designs for types of acceptable neighbourhood intensification. Hence the fact that a development involving an average plot density falling within the matrix limits (for the relevant broad type of area) provided no assurance that its form (including height, block grouping etc.) would actually be suitable for the setting – or for desired mixes of dwelling type and size.

One important point to be understood, in considering whether the NLP's new optimum density policy proposal is 'as effective as using the matrix' is that even *by design* there is little reason for thinking the matrix (as deployed in the past) would be (or has been) effective in relation to policy D6's concern with relating 'built form and massing' to 'the surrounding context … of a development'

A second equally important question to be asked about the density matrix as a *policy instrument* is whether there is evidence that in practice it has been *effective* - either at the aggregate level across London, or differentially across areas within London - in managing the density of new developments in accordance with Plan policies.

On the basis of our analyses for the LPT[1], there is very little to indicate that it has been effective (or even consistently applied) in these respects. More specifically:

- while average densities of new developments within London have risen very considerably over those prior to 2000, the increase seems to have been concentrated in the early 2000s – prior to the first Mayoral London Plan (in 2004) – with no clear evidence of an upward trend since then. We understand this pattern of change as one reflecting a strong *market response* to the tightening of land supply across the Wider South East as a whole *via (national) greenfield quota policies, rather than London-specific planning policies;*
- as noted in our submission for M19, the effect of this general intensification (whatever its causes) seems to have resulted far more in using less land with only a very modest boost to rates of housing delivery;
- at a local level within London, there is an evident correlation between achieved densities of new development and the norms set in the density matrix. But analysis indicates that this overwhelmingly reflects a, strong, response of market forces (interacting with local planners)

[1] I.R. Gordon, A. Mace and C.M.E. Whitehead (2016) *Defining, Measuring and Implementing Density Standards in London*, London Plan Density Research Project 1, Greater London Authority [in EiP Library]. (https://www.london.gov.uk/sites/default/files/project_1_defining_measuring_and_implementing_density_standards_in_london.pdf)
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rather than the matrix itself. The evidence for this is that achieved densities are much more closely related to alternative measures of character and accessibility than to those used to define the matrix (e.g. a more continuous version of TfL's public transport accessibility index, the established local population densities, and character measures for differently scaled areas), while the policy variables which had a substantial impact were Opportunity / Intensification Area statuses (again not the matrix); and

- from the matrix's first appearance in a London Plan onwards, its limits have consistently been more honoured in the breach than in the observance. From the outset, the performance standard has been supposed to involve 95% of approved developments having planned densities within the relevant matrix range. In fact, as has been regularly reported the bulk of development has involved schemes falling outside these limits, with half or more generally above the relevant upper limit.

The last of these observations in particular leads is to conclude that the GLA - with strategic policy concerns for London as a whole is an unlikely guarantor of more local environmental/quality of life considerations which the matrix's upper limits are supposed to protect..

Much better we would argue to find ways of entrusting these to boroughs, in the context of some more generalised norm as to (say) the average densities expected, given the GLA's city-wide concerns.

With removal of the density matrix, the NLP's policy D6 might represent a significant shift in that direction, depending on how the policy will actually be implemented, and the Panel's first question about that, to which we now (much more briefly) turn.

3. Questions about the Likely Effect of the Alternative Density Policy Instruments Proposed by the NLP

We do not claim the technical expertise necessary to be sure what the implications are of the rather lengthy and somewhat opaque presentation of the new policy instruments.

We do, however, note two aspects of the proposals which seem to have different implications for the capacity of boroughs to make situated and locally-informed judgements about the impacts and thus suitability of more or less intensive development proposals:

- on the one hand, the language of 'optimising' densities is repeatedly used in a sense which clearly means pushing densities up, while specifying factors – including future rather than current infrastructure availability/capacity – that are to be used for this purpose; but
- on the other hand, broadening the required set of density measures to be supplied, explicitly addressing issues about built form as needing closer scrutiny in denser schemes, with more use of master planning for large scale development. This all suggests more scope for qualitative factors to be taken into consideration –with an apparent expectation that this will make higher densities more acceptable.

The new instruments proposed are undoubtedly more cumbersome and more expensive to operate than the status quo. It is not clear, however, that the new procedures will actually return more responsibility (as well as influence) to boroughs in relation to making judgements about suitability of different examples of intensification – as would (in our view) be the desirable objective. Rather they seem to imply a very considerable degree of GLA control (beyond what we would regard as its proper role of establishing principles).

4. Conclusion

Intensification is a common-sense strategy for a city like London with (for the past two decades at least) a strongly growing population and limited space within its borders.

The density matrix was one rather simple way of trying to pursue that, by specifying a range of acceptable densities for different spatial contexts within London. Analysis of outcomes strongly suggests that the matrix played little role in determining either the time path or spatial pattern of approved residential densities – which were shaped more by a combination of market forces and national policy constraints affecting land supply across the WSE as a whole.

This is a very poor record for a planning policy instrument, which clearly failed to resolve the tension within London government between a desire to drive densities up across the city, and local concerns over perceived negative impacts on the quality of community life. The new instruments set out in D6 give more recognition to such concerns, but do not seem at all to resolve the tension, or recognise that boroughs are the appropriate judges of the qualitative issues.