

## Just Space response on Matter M39 Density 2718

M39. 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? 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 decision-maker?

We welcome the inclusion of infrastructure capacity in D6A and the specific inclusion of social infrastructure in the elaboration at D6B. The criteria are useful but emphatically not sufficient.

However, while many dimensions of design quality do defy quantification (e.g. some heritage and stylistic aspects) we consider it a grave mistake that the factors which can be measured are not being quantified in firm criteria. **Daylight, sunlight, children's play space and many aspects of social infrastructure capacity should all be subject to quantification** – either alongside a revised density matrix or otherwise tabulated. Without such quantification we are seriously concerned that there will be inadequate guidance for boroughs, widespread inconsistencies between borough practices and great confusion for Forums preparing Neighbourhood Plans. Without precise London Plan standards and criteria to back them up, our members groups are seriously concerned that even the best borough staff will find it hard to enforce high standards on developers.

Furthermore, without quantification – especially of social infrastructure and openspace needs and capacities – neither boroughs nor the GLA will be able to track the cumulative impact of densification which the Panel is right to ask about.

We are also concerned that the needs of some equalities groups – notably Gypsies and Travellers and houseboat dwellers – are incompatible with dense development and this needs explicit recognition in the Plan.

Just Space welcomes the proposed deletion of “in exceptional circumstances” from Policy D6 B3. The new subsection B3A, however, is logical but very dangerous while policy on social housing requirements remains so weak: we

object elsewhere to the tendency for infrastructure costs (including CIL) to crowd out social housing from private schemes. Low cost rental becomes a residual and vulnerable item in 'viability assessments'.

- . 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?

We are profoundly concerned by the proposal in the draft Plan to discontinue upper density limits set in some sort of table or matrix. Clear upper density limits are essential to discourage speculative over-bidding for sites. Our strong recommendation is **that the upper limits of the density matrix should be strictly applied, at least until a borough has developed the Design Code (policy H2B(2)), which should in turn contain transparent and firm numerical upper limits, not only for small sites but for the whole plan area.**

It is important to stress that nothing in the density matrix **prevents** good design and we strongly support the improvement of design. It just requires an upper envelope of density to reduce market uncertainty and speculation.

We note that, elsewhere, the consultation draft Plan accepted the importance of discouraging developers from over-bidding and creating land price rises "based on hope value" (§ 4.6.13). However this logic was applied only to affordable housing percentages and only in Opportunity Areas. The same logic ought to apply to upper density limits and consistently throughout London to minimise speculative land price escalation. **To our shock and dismay the Mayor has resolved the contradiction by deleting his excellent paragraph 4.6.13,** rather than extending it.

In the absence of a numerical envelope, we are confident that leaving density to be assessed on a site-by-site basis across the 35 London planning authorities would be not just a chaotic mess but one which would be a free gift for the most aggressive speculative developers.