

Where next for planning in London? and is Superdensity too much of a good thing?

Hon. Sec. Drummond Robson minuted the June Forum. Full minutes at planninginlondon.com > LP&DF

Peter Eversden supplied the following note of points which offer a context for the first discussion

The London Plan's 2014 version called FALP (Further Alterations to the London Plan) was almost rejected by Inspector as unsound due to 65,000 homes pa being needed but 42,000 set as the target. In paragraph 57 he stated: "The evidence before me strongly suggests that the existing London Plan strategy will not deliver sufficient homes to meet objectively assessed need. The Mayor has committed to a review of the London Plan in 2016 but I do not consider that London can afford to wait until then and recommend that a review commences as soon as the FALP is adopted in 2015 (IRC3). In my view, the Mayor needs to explore options beyond the existing philosophy of the London Plan. That may, in the absence of a wider regional strategy to assess the options for growth and to plan and co-ordinate that growth, include engaging local planning authorities beyond the GLA's boundaries in discussions regarding the evolution of our capital city."

He concluded that the Mayor's aspiration for 49,000 new homes annually are unlikely to be built because of the build rate in recent years averaging less than the previous 2011 London Plan's target of 32,000 annually. Also the 49,000 figure would not meet the need over a reasonable timescale and that it would require higher densities to be permitted than would be the case for the FALP's target of 42,000 homes pa. He wrote in paragraph 42 of his report:-

"It cannot be assumed, in my view, that it will be appropriate to increase densities over the existing Density Matrix guidelines in all cases. Town centres are accessible locations but each has its own character which new development should respect. Opportunity Areas and large sites have the potential to determine their own character and identity but they should still have regard to their surroundings. Meeting the pressing need for housing in London will require new, innovative and possibly unpopular solutions but care must be taken not to damage its environment."

The Inspector's recommendation for an immediate London Plan was dashed by DCLG when Ministers then demanded two further revisions of FALP. That brings us to the main hurdle we face in planning in London which is the outpouring of Government diktats on Permitted Development and Use Classes.

But first, the Government's interference in the London Plan. The work on a replacement London Plan to consider the capital in its wider Metropolitan Area or city region context was put on hold whilst the Outer London Commission, of which I am member, and the London Plan team dealt with the Minister's demand that the parking standards and the housing standards in London should be altered.

We are now wasting this year going through those two unnecessary changes to the London Plan and another examination in public.

The Outer London Commission has now commenced its deferred examination with the outer London boroughs of growth options, includ-

ing development in growth corridors, densification, infrastructure, coordination of planning with authorities in the wider south-east and the barriers to housing delivery.

Just in case we or the Mayor get the wrong idea of what the last Inspector meant or how planning could be done properly, DCLG issued another order "There shall not be another SERPLAN". We will see.

Sensible local authorities are beginning to review their Green Belt. Several planners have calculated that strategic garden cities on growth corridors with good public transport outside London should be considered. The local authorities around London do not want to just build more dormitories for London's workers. They want sustainable urban development and economic growth of their own.

We have a real housing crisis and we have to solve it. That includes making sure that homes to rent are affordable which is becoming a problem, as is security of tenure. Meanwhile the Right to Buy extension to housing association properties and the enforced sale of high value social housing are more examples of Government interference without assessment of consequences.

I recommend everyone reads Andrew Lainton's paper on 'The Spill' - Where Homes Could Go: <http://bit.ly/1JGce5g>

It seems that twice as many homes have been approved each year (275,000 total) as are being built. That is why 'Use It or Lose It' has been discussed. Boris could be tough in his last months as Mayor.

Permitted Development of office to residential

The findings in a by consultancy Nathaniel Lichfield & Partners (NLP) shows that in the last decade the number of office jobs have risen by 21 per cent, but the total stock of office space has failed to keep pace rising by 17 per cent.

The report says that the changes to permitted development rights "has the potential to lead to a future deficit in office space and increased pressure on office markets". Vince Cable said the same thing.

NLP pointed to a study by RICS which found that nationally the availability of office space has been declining at its fastest pace since 1998, "fuelled by the growing conversion of offices into homes since the new PD rights were introduced". RICS found also that rental prices of remaining office space had soared.

NLP concluded that "taking into account broader industry metrics ... there are signs that the new PD rights policy is partly behind a race for space in major urban locations".

Local Authorities in Central London report less than 3% available office space. The type of homes delivered by office conversion are not the type they need. Small and Emerging Enterprises are being driven out of London.

That is my summary of the current situation from which we must plan to emerge as a successful capital city with a decent quality of life.

- Peter Eversden, London Forum

Where Next for Planning & Development in London? in light of political changes and imminent 2016 mayoral race. **Lisa Fairmaner, Head of plans and policy, City of Westminster** and **John Lett of GLA** and **Peter Eversden, London Forum** helped to lead this.

The Chairman introduced Lisa Fairmaner who sought to explore the likely changes to planning regulation following the general election. She suggested that The New Secretary of State, Greg Clark appears likely to pursue further deregulation of permitted development rights and use classes inclusive of reducing policy exemptions. She and others considered this approach to be inappropriate in London.

The Westminster Property Association in a paper dated 31st March 2015 considers:

Maintaining Mixed-Use and Diversity

39. A separate policy intervention to secure the mixed-use character of the West End is not required (**Key Questions 1 and 2, Page 14**). This matter is best addressed through the introduction of CAZ-wide planning policy. WPA has, subject to detailed comments, supported the introduction of a criteria-based policy for assessing the conversion of offices to residential. London Plan Policy 4.3B provides for the protection of small offices, below 500sqm, where justified by local and strategic office demand and supply. No additional layer of policy is required for the West End; in practice, given the heritage constraints of the West End and the prevalence of smaller, listed, buildings small offices will continue to be provided in any case.

40. In its response to the Mixed Use and Office to Residential booklet, WPA has strongly supported a relaxation of mixed use policy. It has also recommended that mixed use policy should only apply to office development, rather than all commercial uses such as retail. This would be particularly beneficial for the West End as it would promote the development of other commercial, non-office, land uses that add to the mix of uses that characterise this area.

John Lett was concerned that of some 260,000 planning permissions only some 25,000 were being implemented in London, thereby distorting the true impact of the recent policy changes. While employment growth is increasing faster

than forecast residential development is not keeping pace. While some of the better office space is becoming residential much of the space which was intended to facilitate change of use is not changing. The secondary legislation policy is a very blunt tool to influence land use. One reason why permissions are not being taken up is that the permission is lost for buildings not complete by May 2016. A proposal to extend the period to 2019 has itself been postponed.

London's Delivery Challenge may be summarised in a few stark statistics:

Need = 49,000 a year

Approvals = >50,000 units a year

Pipeline = circa 270,000 approved units

Completions = 27,000 units a year

The impact of CIL charges following their intro-

duction also has stopped most further office development.

Lisa Fairmaner was concerned about the impact relaxation of controls was having on small scale industries such as gaming and game design-

ing which is one of Britain's success stories. She also advised approaching John Walker Operational Director, Development Planning, Growth Planning and Housing, Westminster City Council who had put forward proposals for the Westminster area.

This discussion was followed by John Lett's first illustrated presentation and preliminary airing of proposals to consider approaches to a full review of The London Plan. He questioned whether London's growth was inevitable, given that cities do decline. He cited regime change, 'interventions', economic restructuring, suburbanisation, migration/ageing. London itself did not grow between 1945 - 85 (although there was planned and deliberate decentralisation and the creation of new Towns during that period, unlike at present). Potential causes could be Future uncertainties e.g. international migration; housing accessibility; social facilities/qol; transport costs; productivity; sectoral competitiveness or inadequate infrastructure. (*see table RIGHT*)

Forecasting migration is a key uncertainty in the population statistics. JL considered 5 potential spatial scenarios for London to 2050 (some as reported at the last LPDF meeting) These were given as Secretary to the Outer London Commission or in a personal capacity rather than expressions of current GLA policy.

2050 Infrastructure Plan and other scenarios

These are only 'what if' scenarios to inform discussion on options for London Plan review

- 2050 LIP assumes spatial development will reflect 2015 London Plan up to 2030s
- assumes 2031 base population 9.84 m (as per Plan), 2050 population 11.27 m
- explores different ways of housing this extra population: trend based growth within London; inten- >>>

Meeting on Monday 29th June 2015 at University College London. Our host was Nina Jaselik for Michael Edwards

Brian Waters: Chairman
Alastair Gaskin: London and UK Property
Andrew Rogers: Association of Consultant Planners
Ben Derbyshire: HTA Design
Brian Whiteley: Planning Aid for London
Chris Alder: Living Architects
Jessica Ferm: UCL
Lisa Fairmaner: Head of Plans and Policy City of Westminster
Michael Coupe: London Society and Coupe Planning

Neil Wolfson
Peter Eversden: London Forum `1
Ron Heath: Living Architects
Riette Oosterhuizen: HTA
Tom Ball: London Forum
Drummond Robson: Honorary Secretary and Robson Planning Apologies.
Robert Evans of Argent, Duncan Bowie, Ghislaine Halpenny, Mike Southgate, Michael Edwards, and Nikons Karadimitriou

sification in any areas with good PTAL; good PTAL town centres; good PTAL suburban areas; and existing urban areas beyond London

OLC additionally may wish to consider two extra scenarios: release of industrial land in good PTAL locations and, possibly, Green Belt release in good PTAL locations

Scenario 1: Trend Based Growth

(could accommodate 11.27 m cf 11.27m projected, 16% growth in inner, 14% in outer)

Scenario 2: Intensification in areas with good public transport accessibility

(could accommodate 11.24 m cf 11.27 projected, 30% growth in inner, 4% in outer, or 11.39 with XR2 and BLE)

Base scenario assumes:

- LP housing policy
- PTALs from funded and committed transport infra eg XR1, HS2, LU upgrade
- Only uses PTALs 5 & 6
- Densities increased to mid point ranges in 'suburban', 'urban' and 'central' areas for these PTALs .
- Variant scenario assumes
- Additional rail investment currently being planned eg XR2, BLE
- Consequent PTAL changes

Scenario 3: Town Centre Intensification

(could accommodate 11.21 cf 11.27 projected, 11% growth in inner, 16% in outer)

Assumptions:

- only Major and Districts
- Based on LSOAs covering TCS
- Densities applied as per SRQ for PTAL
- Majors = 'central' character
- Districts = 'urban'
- Median level densities
- Those TCS with densities already above SRQ not changed

Scenario 4: Suburban Renewal/ Intensification

(15.89 m growth cf 11.27 projected, 34% growth in inner, 79% in outer, or if capped at 11.27 m, 6% growth in inner and 21% in outer)

OLC earlier work underscored potential economic benefits of increased housing – 230 jobs/000. Housing Strat has noted potential issues over under occupation and long term maintenance

Consultancy HTA and NLA have highlighted scope for suburbia to make greater contrib to meeting housing need without compromising quality/character eg if 10% of OL semis were fully occupied than cld accommodate 100k. If 10% were redev at 2x density then could get 400k new homes.

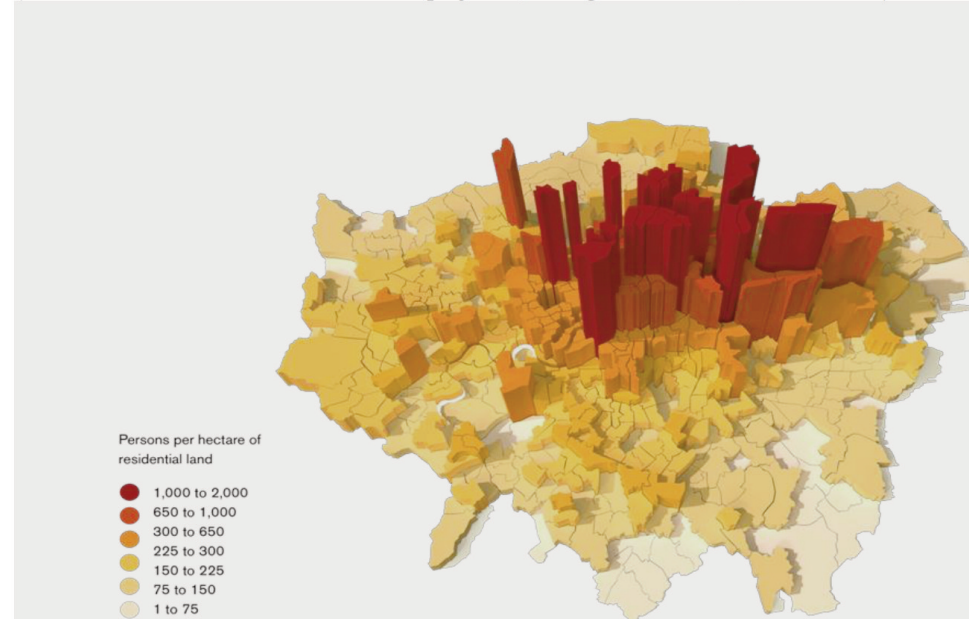
See Supurbia models – town houses/low rise.

Advanced world cities' approaches to 'growth'

City	London	New York	Paris	Tokyo
Area Sq km	1572	790	105	2,188
Population m	8.6 (2015)	8.5 (2014)	2.2 (2014)	13.4 (2014)
Population Increase 000	76pa (to 2036)	34.4(2000-2014)	10.7 (1999-2010)	Static Falling post 2020
Households m	3.4 (2014)			
Household increase 000	40-43pa (to 2036)			
Employment m	5.6	4.2 (2015)	1.8 (2011)	7.3 (2012)
Employment Increase 000pa	40-50 (to 2041)	42.3 (2010-2020)	10 (2006-2011)	36 (2008-2012)
Planned Housing Increase pa	49	24	4.5	111
Policy Approach	PT based intensification Opportunity areas Implicit rezoning	PT based intensification Opportunity areas Rezoning	Opportunity areas Regional Dev	PT based intensification Opportunity areas
Major Rail	Xrail.BLE GOB	15 schemes+1Sbn	Orly St Denis RER 205km metro +	Improved links to Haneda & Narita Airports

Scenario 1: Trend Based Growth

(could accommodate 11.27 m cf 11.27m projected, 16% growth in inner, 14% in outer)



Problem is site assembly though do make lot of suggestions on how to this – incentives based.

Scope to accommodate parking in line with PTAL

Assumptions:
Only 1930-39 housing
Within these only those at LT 30 dph (LT LP min 35 dph in PTAL 0-1)

Increase densities there by 25% - may still not be above 35 dph

Scenario 5: Selective Intensification of Towns Beyond London (1 million RoSE population increase, London 2050 pop 10.3 m cf projected 11.27)

A key issue/concern for wider SE

Some misunderstanding on how SHMAs are calculated – they must take account of in and out migration – recognised by NPPF. Historically net London out migration in order of 70-100k pa, but dropped to 30k during the recession, but 5 year based ONS/CLH projections have perpetuated

this. Discuss this in greater detail in next 'issue' on the agenda.

What we are looking at here is growth over and above that identified to address local long term migration trends.

Assumptions

- Only apply to existing urban areas – so don't take brownfield/greenfield sites already identified for Local Plan purposes
- Only applies to areas with high levels of deprivation – 25% most deprived
- Only applies to currently low density areas: 15-70 dph as commonly found in PTAL 0-1
- Uplift to 100 dph – in line with London suburban densities for areas with reasonable PTAL
- Does NOT apply to 'un-commutable' counties – Norfolk, Suffolk, Oxon, S Hants (NB bits of Suffolk might in fact be interested)

Possible other Scenarios

- Airport related development?
- Wider scale Estate Renewal?
- 'Cohabitation' of industry and residential?
- Selective Green Belt release?

New scenario: Green Belt - selective intensification / development

35k ha – variable quality and uses, not clear how far it still performs its prime functions (stopping towns merging) yor whether those are still relevant. But it is dearly loved, even by those of us who never see it from one month to the next. And it is an important factor in encouraging a compact city and the economies and efficiencies which go with that.

Though it is also arguably limiting Londoners' choice as to historically preferred housing form – low density suburbia.

Very strong lobbies for and against GB release: though scale not clear

Against: Loco 7k (filtered), Andrew Lainton 70k (filtered), CPRE?

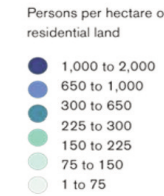
For: Paul Cheshire c700k (filtered). London Society 10k ha including beyond London, 1 m homes @ 100 dph; Centre for Cities 18k ha within London, 432k dwells @40 dph and filtered for 2km of a station; London First 19k ha from London filtered for 10 mins stn, no env value, 1 m homes @50 ph; Adam Smith Institute - national but with filters

LP quite clear on GB release " strongest protection in accordance with national guidance'

Very effective policy: Over 98% of our development comes from brownfield sites. Green Belt loss over the last decade averaged only 1.6ha pa., London has c35k hectares of Green Belt, so we are losing 0.005% pa and may run out in 22,000 years.

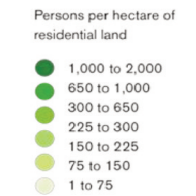
However, policy is tied to NPPF which is actu-

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ally flexible on release providing it is justified through Dev Plan process – and that does happen a bit eg Redbridge. NPPF makes clear this is a policy for local borough application

We could just leave it at that and let LBs release in light of own circs – others are thinking about it to meet local housing needs (which we require them to do)

OR

Would it be better planning if a strategic view was taken eg only release that which doesn't have env value/does produce sustainable development

– what detailed filters required?

NB NPPF does not say explicitly that Mayor can't be involved – and GLA Act allows mayor to decide what is a strategic matter.

OLC choice (like industry)

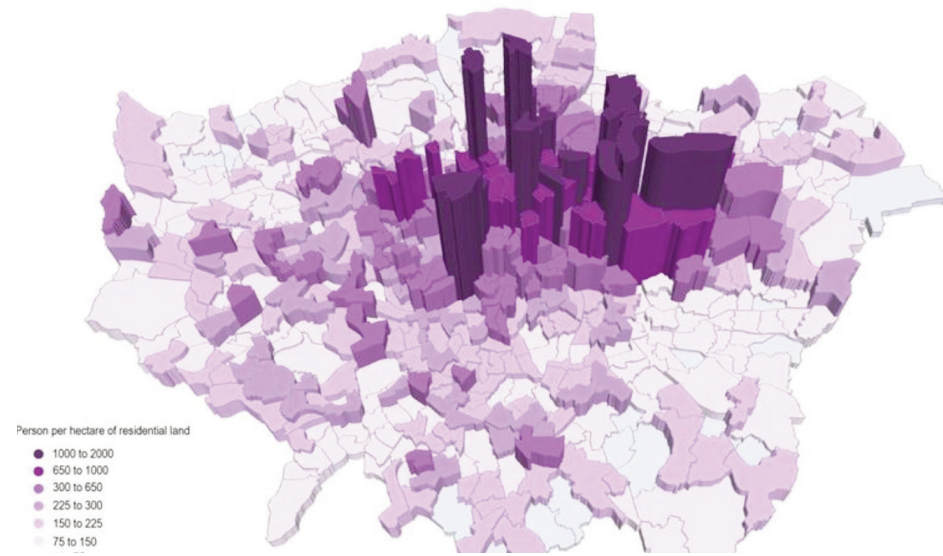
Or Specific infrastructure scenarios: Crossrail 2 options / intensification or Bakerloo Line Extension options / intensification

Questions

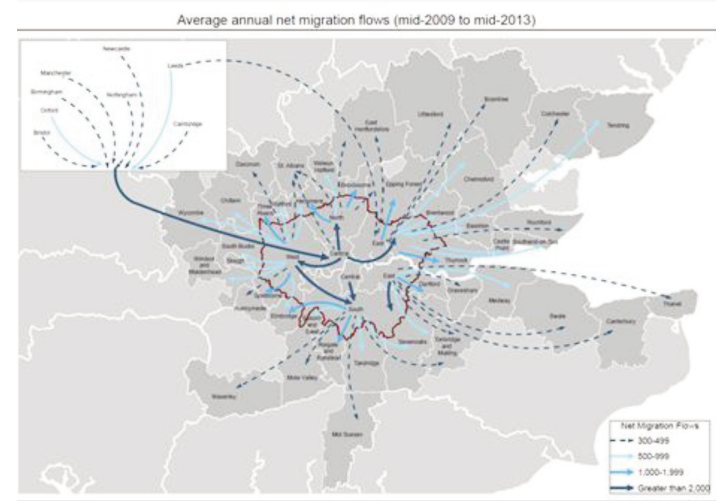
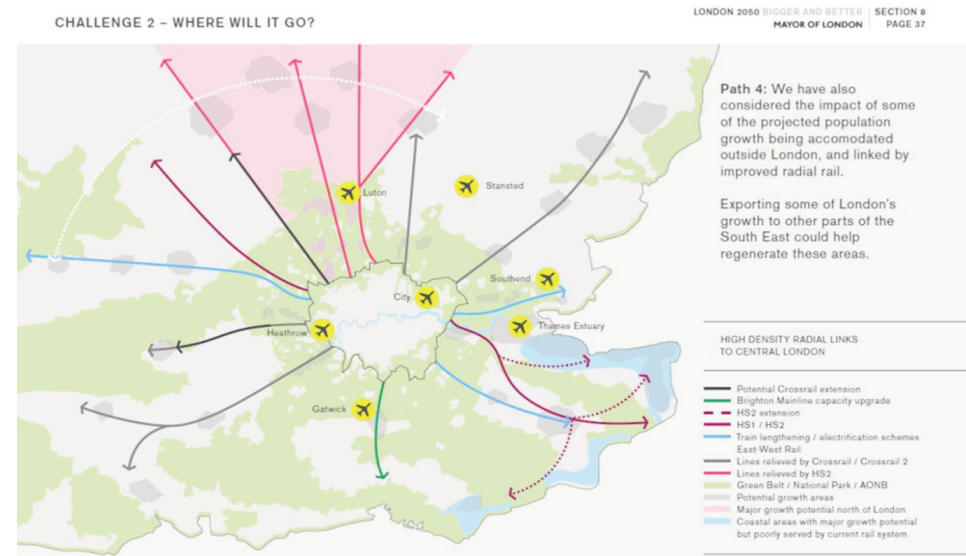
- G1 How important is it to maintain a balance between housing and employment in a growing >>>

Scenario 4: Suburban Renewal/ Intensification

(15.89 m growth of 11.27 projected, 34% growth in inner, 79% in outer, or if capped at 11.27 m, 6% growth in inner and 21% in outer)



Scenario 5: Selective Intensification of Towns Beyond London (1 million RoSE population increase, London 2050 pop 10.3 m cf projected 11.27)



post-industrial city? What do you think the right balance is?

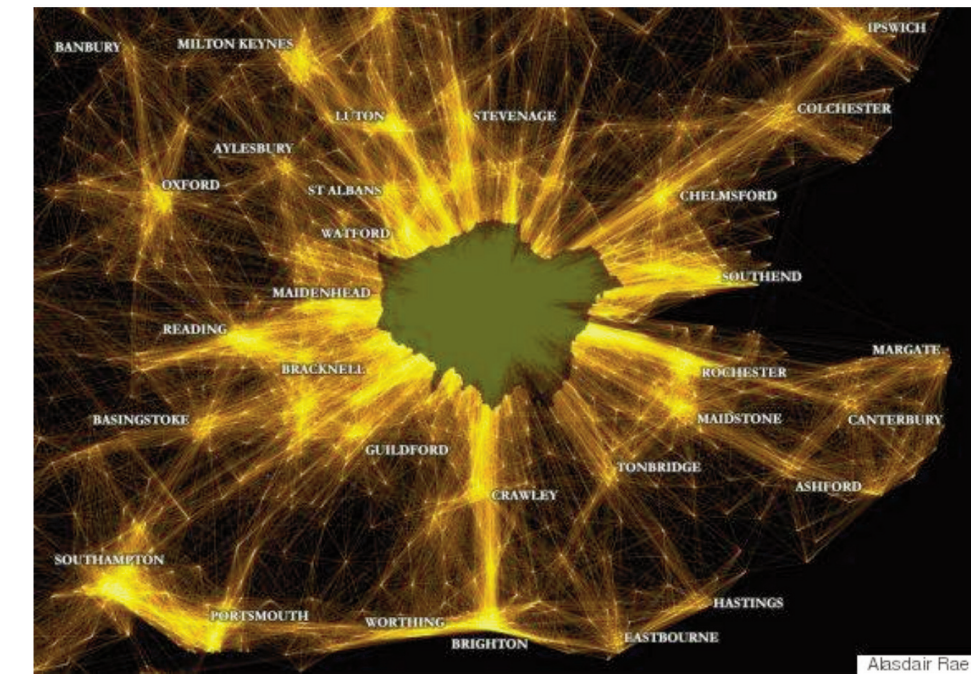
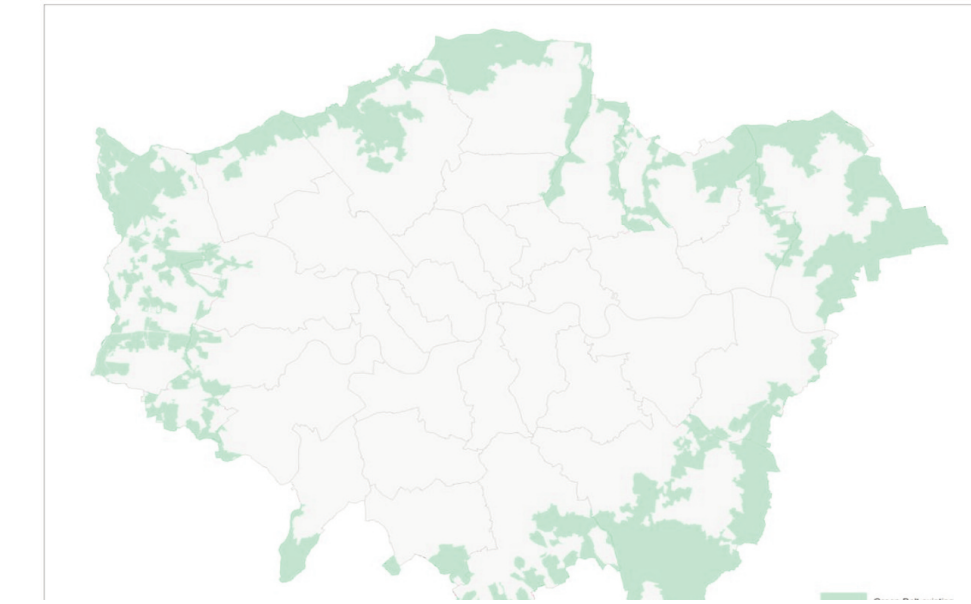
- G2 If London continues to expand the housing pipeline/ allocations, will that distort the balance between housing and employment? What significant effects might that have within different parts of outer London?
- G3 What type of workspace/ employment land will be required in the future relative to trends in the existing stock? Does this require a policy approach which extends beyond London?
- G4 In the context of meeting London's growth, what contribution should the following mechanisms make to helping to meet the challenge of delivering increased levels of housing?
 - Increasing outer London densities, particularly through suburban renewal
 - More housing at higher densities in town centres and Opportunity Areas/ Intensification Areas with good public transport
 - Greater cumulative contribution of small scale sites, such as infill
 - Selective release of London's greenbelt around public transport nodes for housing (or consolidation of employment)
 - Densification of built up areas beyond London (new towns; garden cities, suburban extensions)

For each, where might there be particular opportunities, how could this be supported and what / where are the specific challenges and constraints (eg what impact might this have on character and context; land values; balance between housing and employment; access to particular types / lower cost employment space, infrastructure requirement, etc).

- G6 Would it be worth considering growth 'corridors' (eg as with LSCC and linked to existing / potential public transport) in terms of enabling an integrated housing / employment / cross-boundary strategy...and if so, which corridors could be a focus (eg associated with CR2, HS1, HS2, CR1 extensions, C2C improvement, Gatwick)?
- G7 How can we maximise the benefits of growth regionally, sub-regionally and locally; and mitigate concerns? (eg provision of supporting social and community infrastructure; greater focus on place-making; re-provision in the new development of social housing)
- G8 Does the London Plan density matrix need to be reviewed (eg PTAL splits, characterisation, the ranges themselves), or is it better to keep it as a benchmark and use it to bargain for higher quality / more social infrastructure / more affordable housing?
- G9 Have you any suggestions for new Opportunity/Intensification Areas; or medium sized town centres suitable for higher density, housing led renewal/redevelopment?

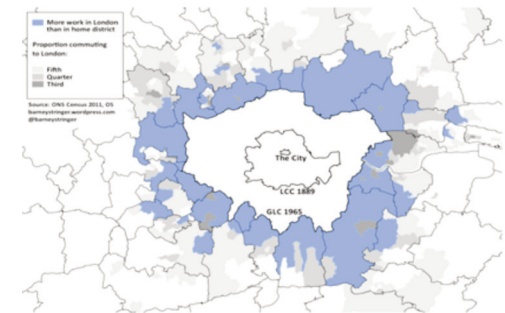
JL also posed more fundamental questions on

New scenario : Green Belt - selective intensification / development



Commuting in London and the South East - flows of 10 or more. From 2011 Census

What sort of regional geography is required eg to address the impact of commuting on local economies?



Recession migration impact & ONS/CLG 5 year projections: possible implications for housing demand & supply

	London	South East	East
Supply (average completions 2004 - 11 pa)	24,300	29,600	21,300
Demand i (CLG 2008 hhlds pa)	37,900	41,100	33,900
'gap':	-13,600	-11,500	-12,600
Demand ii (CLG 2011 hhlds pa)	52,600	38,400	28,100
'gap':	-28,300	-8,800	-6,800

what form regional planning should develop and how to co-ordinate regional policy and infrastructure investment which emphasises the growing unplanned relationships between London and its wider region. Just four images are selected from this theme. The Duty to Co-operate continues not to be observed at all effectively between London and its neighbours. Time constraints at the meeting prevented proper consideration of these important matters.

JL encouraged responses to the above scenarios in pursuit of refinement or consensus on the ideas. Discussions are being held with 153 authorities in London and the South East with meetings being held as follows:

- 8th July - Ealing 2pm
- 15th - Enfield 9a.m.
- 22nd Croydon 2pm
- 29th Bexleyheath Civic Offices 2pm.

Discussion Topic b.

Has Superdensity gone too far? Ultra and super-density housing with **Ben Derbyshire, managing partner, HTA Design.** **John Lett** of GLA's presentation contributed to this topic.

Combining his own ideas with those of Andrew Beharrell of Pollard Thomas Edwards, Matthew Goulcher of Levitt Bernstein and Andy von Bradsky of PRP Architects Ben Derbyshire asked: *How dense can we be? and Why density matters.* He reminded us that Standards are not the same as quality and guidance not the same as rules.

He also stressed that the discussion should not become fixated about tall buildings: towerphilia versus towerphobia, and suggested integrated and diverse designs:

Key is a proper relationship with the street and public realm. He said that mid rise street based alternatives can meet all London's housing needs and create popular and sustainable places.

He referred back to Walter Gropius who as the father of the modern movement spoke as early as 1929 of low middle and high rise building (Flach, >>>



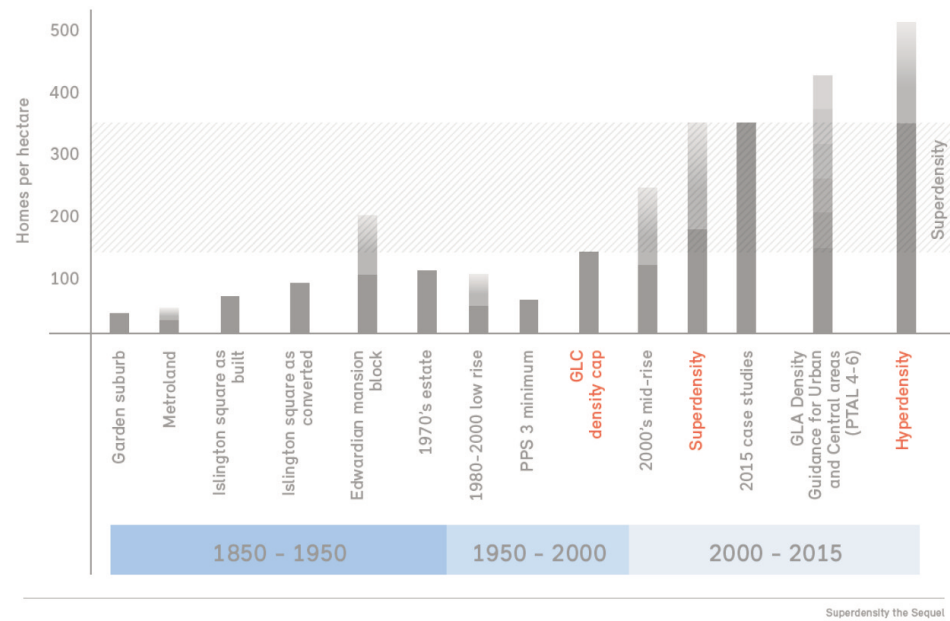
Mittel and Hoch). He also referred to Noll's studies of cities from 175 years earlier.

He was critical of local authorities for failing to provide proper supplementary guidance involving a robust public realm strategy which is beginning to lead to disjointed hyperdensity. He recommended after Jan Gehl: first life, then spaces then buildings rather than the other way round. Designing for street life and integrated uses with robust public spaces, so that towers should enhance not blight the ground plane. The London Plan should be refined to encourage these ideas to give a proper spatial dimension to design.

BD offered the following advice to the new Mayor:

Fight for devolved land and property taxation, use the powers you have, create urban development corporations and

Why density matters



use cpo powers, lay down public realm requirements first.

Chobham Manor, London Legacy Development Corporation

Hyperdensity (of the kind being pursued at Nine Elms) is a threat to diversity leading to spiralling property prices, and threats to affordability, sustainability and a changed landscape. This can be mitigated or prevented by policies offering a broad mix of tenures, sizes and typologies, mixed use and delivered affordable housing together with practi-

cal steps to harness space above non-residential uses, designing with families in mind, creating larger homes with street entrances and integrated specialist housing.

Recommendations include creating genuinely mixed developments, catering better for families, setting targets as bed-spaces/hectare and providing a wider range of housing typologies

Finally BD made the case for managing superdensity to reduce excessive service charges by design and layout changes allowing for improved entrances, concierge facilities and deliveries, servicing technologies: lifts, MHVR, IT, energy centres, better external servicing, (refuse, cycle provision and cars). Improved public realm: materials, landscape and vehicular access. Responsive maintenance involves caretakers and a sinking fund. The approach – assuming single land ownership – should be tenure blind.

Mitigating management costs include incorporating maintenance costs in the business model, ring fencing income from ground rents for a sinking fund, commuted sums from land value or profit, a cap on LA service charges, sharing costs over a wider area for economies of scale and an extended defects period for M&E and landscape works.

The resultant recommendations proposed are to mitigate management costs at concept and design stages, having a policy of mid rise before high rise, balancing capital and maintenance costs and seeking new funding streams for revenue and management costs.

Ensuing discussion was somewhat restricted by time: BD was asked to define mid density which he said was broadly 8-10 floors and so requiring a lift, though he added that in certain circumstances 25-30 floors may be relevant. He wished to pre-



LEFT: Chobham Manor, London Legacy Development Corporation

BELOW: Ben Derbyshire suggested shared housing as a further response to the housing crisis:

vent the "feeding frenzy of avarice" which is creeping into some recent hyperdensity design and simply becomes a bidding war. He defended the Aylesbury Estate from the criticism of Social Cleansing. He was concerned about the absence of a sinking fund for the Barbican which meant that occupiers had to stand little planned hefty bills from time to time. At densities greater than 350/hectare management costs become seriously expensive.

He agreed that the threat of cpo should be considered as part of Masterplanning areas with diverse ownership to balance shifting and floating values.

Forum members are invited to a forthcoming meeting <http://www.bartlett.ucl.ac.uk/planning/events/rethinking-transport-appraisal-2>
Rethinking Transport Appraisal - Developing the Approaches to Transport Appraisal
17:00 - 19:00 09 July 2015 Location: Gustave Tuck Lecture Theatre, Wilkins Building, UCL, Gower Street, London WC1E 6BT

LP&DF

NEXT MEETING

Is at the GLA on Wednesday
9th September at 2.30pm
Our host: Colin Wilson

