

Quality and quantity

With the publication last month of the new Housing direction for housing in London



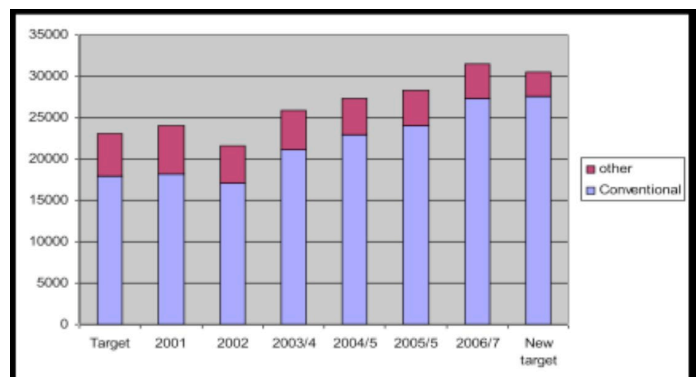
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Last September, Ken Livingstone published his new housing strategy. He claimed that there had been a significant increase in housing output in London and that his 50 per cent affordable homes target was deliverable – if only all London boroughs would make their contribution. In February, the Mayor published his figures for net housing completions in London in 2006/7, with the figure of 31,430 not just exceeding the original London Plan target of 23,000 but in fact breaking the new post Alterations target of 30,500 which actually only applies from 2007/8.

However only a third of housing output in London over the last few years is categorised as affordable - as a proportion of net total supply, the

proportion was 34 per cent of conventional supply for 2003/4 to 2005/6 and remained 34 per cent for 2006/7 (31 per cent of total supply including non self contained homes and vacants returning to use). While some 60 per cent of affordable housing output in 2006/7 was social rented provision – below the Mayor's 70 per cent target, when you net out replacement housing within social rent schemes, the proportion actually falls to 48 per cent, with 52 per cent being intermediate provision - mainly shared ownership homes, generally for households in the £25,000 to £60,000 a year income range. With net output of new social rented housing averaging under 7,000 a year over the last few years compared with the 22,000 a year needed, the backlog in unmet housing need for social rented housing is increasing rather than reducing, especially when you take into account the continuing, though lessened, flow of council homes into the market sector through council house sales. The fact that some of the shared ownership homes are increasingly expensive is well known – what is less common knowledge is that with the Government's rent target system, which takes into account

Table 1
Completions 2001 to 2006/7



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the GDPO.

26. The process of validating planning applications should essentially be an administrative process. Local planning authorities are encouraged to adopt a straightforward approach to validation, whereby they should check that the correct information and fee (where applicable) have been submitted with the application.

27. The quality of the information submitted should have no bearing on the validity of the planning application during the validation process but should be assessed during the determination process.

28. Article 5 of the GDPO makes it clear that provided the application submitted meets the requirements set out in the GDPO encompassing the mandatory national requirements and published local requirements then it should be registered as a valid application.

29. If an application submitted lacks the necessary information specified both in the GDPO and in local planning authorities' published lists they will in general be entitled to invalidate the application, and so decline to determine it.

30. Where an application is not accompanied by the information required by the local planning authority, the applicant should provide written justification with the application as to why it is not appropriate in the particular circumstances. In such cases, local planning authorities should not automatically declare the application invalid unless they can justify the need for the information in the particular case.

31. Applicants are therefore encouraged to agree information requirements with the local planning authority prior to submission through pre-application discussions so that where possible the information sought is proportionate to the nature of the scheme. It is particularly important that local planning authorities only seek information that is necessary for a decision to be made and should not require a level of detail to be provided that is unreasonable or disproportionate to the scale of the proposal. Not all the information on the local planning authority's published local list will be necessary in every case.

32. In most cases the information requirements will be very clear. However, there may be circumstances where applicants do not agree with the requirement for information or plans set out by the local planning authority and wish to challenge the decision not to validate an application. In such cases, applicants have the right of appeal for nonvalidation under section 78 of the Town and Country Planning Act 1990 with the relevant ground for the appeal being non-determination within the 8 or 13 week determination period (see paragraph 36 below). If the inspector agrees with the applicant's view that the necessary information has been provided then the application is determined at appeal. If the inspector agrees with the local planning authority, the applicant is required to provide the additional information to the local planning authority to enable them to validate and determine the application.

City: who are we building for?

Density Matrix and revised policies in the London Plan, Duncan Bowie explains the need for a change of

property value as well as income, and increasing service charges for higher density mixed tenure developments, new social housing in inner London can take up as much of 50 per cent of net household income for the households housed, rather than the 30 per cent assumed in the London Plan definition of affordability.

There is an even greater problem – most of the new social rented housing and shared ownership hous-

ing in London is flatted rather than houses – a contrast with most of the rest of the country, including the Home Counties. The higher the density of development, the lower the proportion of family sized homes

Only 27 per cent of recently completed social rented homes in London have 3 or more bedrooms. In last year's new Housing Corporation programme, this was increased to 35 per cent, and the new housing strate-

Requirements Study estimated a requirement for 4 bedroom homes at over 40 per cent. We need to dramatically change the type of homes being built in London if we are to deal with the increase in overcrowding – overcrowding in London doubled between 1991 and 2001 – with increasing shortages in affordable family housing and increases in labour migration to London, necessary to fuel London's booming economy, it is likely that the next census will pick up a further increase in overcrowding. The polarisation of extreme wealth and poverty is getting worse rather than being lessened.

Considerable media attention has been given to the return of high rise development to London. One of the arguments put forward by the Mayor for high rise is that building high produces more affordable housing. Unfortunately building high generally does not significantly increase affordable housing output. The build costs of high rise developments are sometimes as much as 4 times a unit as low rise developments, so unless there are very high premiums on the penthouse flats, which is only possible in some central London locations, high rise developments don't provide more subsidy for social rented housing. Moreover, given most of the flats in high rise developments are studios and small 1 and 2 bedroom homes, there is always a limit to how many 3 and 4 bedroom social rented or shared ownership homes you can get in the lower floors with reasonable access to playspace – critical given the 10 sq m per child standard is now in effect following the publication of the Playspace SPG in March. If you take the affordable housing contribution for a development off-site,

there is an increasing difficulty, especially in central London, in finding an appropriate site, which doesn't just make the tenure and social polarisation even worse.

Building a few high rise developments for market demand in central London would not in itself be a major difficulty – the problem now is that higher rise development now represents a high proportion of London development – average

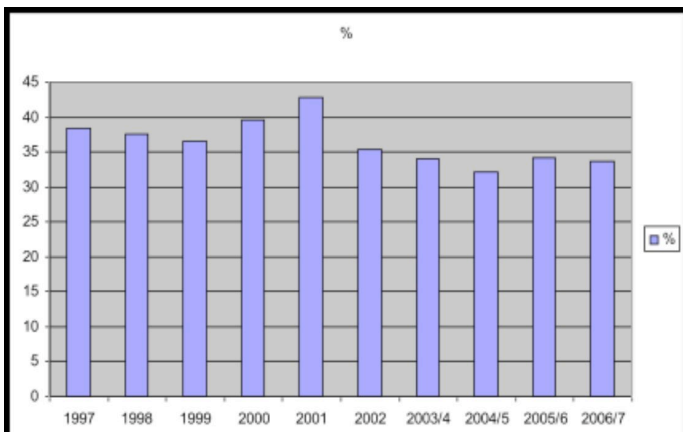
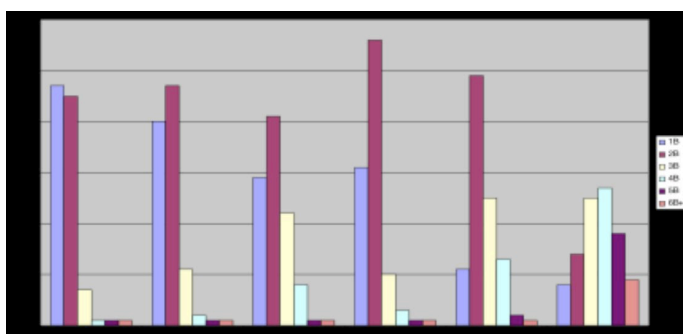


Table 2 [above] Affordable Housing Output (as per cent total conventional supply)

Table 3 [below] Development density and bedroom size mix (2005/6 permissions)



ing being built is not suitable for families, and the new supply of social rented homes for larger families is minimal. The vast majority of new development being undertaken in

city takes the target to 42 per cent – but the decision not to set a target for 4 bedroom or larger homes is disappointing, given output is only about 4 per cent and the Housing

development densities have in fact increased from 70 homes a hectare to 136 homes a hectare over the last few years. Given some outer London boroughs are still developing at only 30-50 dwellings a hectare, the averages now disguise average development densities in some central boroughs of 150-300 dwellings a hectare, and several individual schemes of over 1,000 dwellings a hectare. Moreover this tower block tendency is not limited to central London – many outer London boroughs – Ealing, Redbridge, Newham, and Barking for example, all want their landmark buildings – one of the highest density schemes recently consented is the Pioneer market tower in Ilford.

2003/4	1 scheme 45 units
2004/5	7 schemes 833 units
2005/6	23 schemes 6,122 units
2006/7	14 schemes 3,275 units
Apr-Jun 2007	6 schemes 1,954 units

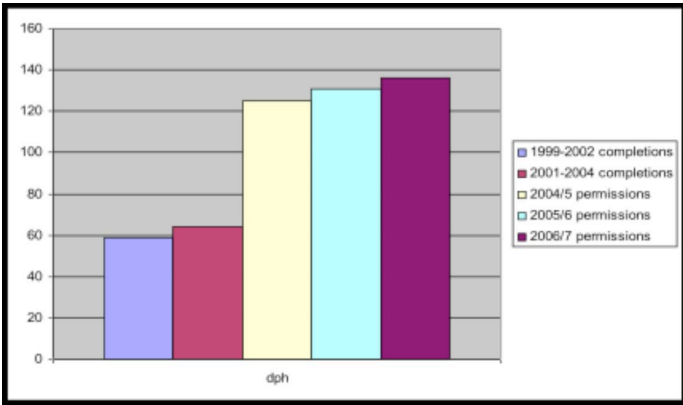
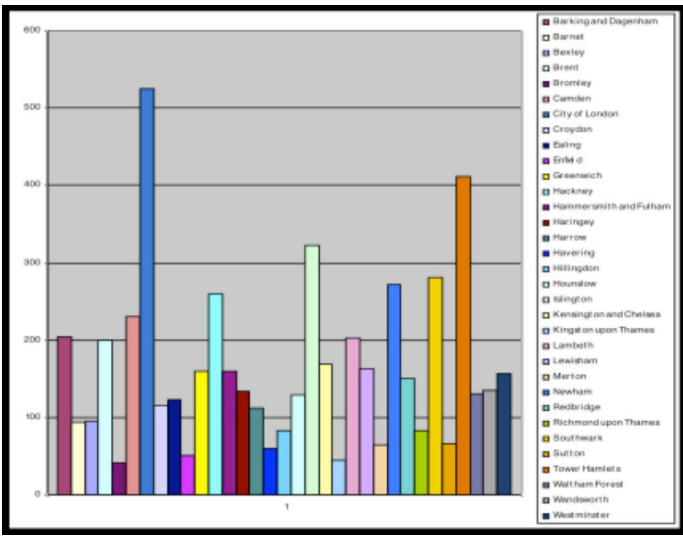


Table 5 [above] Development Densities

Table 6 [below] Development Density by borough



The review of the London Plan undertaken by URS for the GLA in 2006, published as the London Plan Density Review, the recommendations of which are now incorporated in the Consolidated London Plan published in February 2008, seeks to correct some of the deficiencies in the 2004 density matrix. The original matrix focused included densities in both units per hectare and habitable rooms per hectare but with only some of the cells completed, the implication was that development in central areas should be mainly small flats, with family sized housing mainly in the suburbs. Moreover, where a developer chose to build flats in the central or urban area, the guideline density was significantly increased, irrespective of whether or not the mix of housing was appropriate to needs. Where car parking provision was minimised, even higher densities were permissible.

A number of changes were therefore made to the matrix. The focus was shifted to habitable rooms per person, with indicators of unit output for different ranges of housing type mix in all locations – including larger units in central London, and smaller units in outer London – if these were appropriate to meeting housing needs. Car parking level as a determinant of density was removed – the standards on car parking already in the London Plan provide adequate policy guidance. Most significantly, the built form of the proposed development is no longer a driver of density – the two drivers being the PTAL (Public Transport Access Level) and the Setting of the development

(the area character including relationship to a town centre). The choice of mix of units is for the Local Planning Authority to determine having regard to site characteristics and housing need and demand. As

Table 3A.2 Density matrix (habitable rooms and dwellings per hectare)

Setting	Public Transport Accessibility Level (PTAL)		
	0 to 1	2 to 3	4 to 6
Suburban	150-200 hr/ha	150-250 hr/ha	200-350 hr/ha
3.8-4.6 hr/unit	35-55 u/ha	35-65 u/ha	45-90 u/ha
3.1-3.7 hr/unit	40-65 u/ha	40-80 u/ha	55-115 u/ha
2.7-3.0 hr/unit	50-75 u/ha	50-95 u/ha	70-130 u/ha
Urban	150-250 hr/ha	200-450 hr/ha	200-700 hr/ha
3.8-4.6 hr/unit	35-65 u/ha	45-120 u/ha	45-185 u/ha
3.1-3.7 hr/unit	40-80 u/ha	55-145 u/ha	55-225 u/ha
2.7-3.0 hr/unit	50-95 u/ha	70-170 u/ha	70-260 u/ha
Central	150-300 hr/ha	300-650 hr/ha	650-1100 hr/ha
3.8-4.6 hr/unit	35-80 u/ha	65-170 u/ha	140-290 u/ha
3.1-3.7 hr/unit	40-100 u/ha	80-210 u/ha	175-355 u/ha
2.7-3.0 hr/unit	50-110 u/ha	100-240 u/ha	215-405 u/ha

Table 7 The new London Plan Density Matrix

the altered London Plan it self states at para 3.21:

“the form of housing output should be determined primarily by an assessment of housing requirements and not by any assumption as to the built form of the development”

The original 2004 density matrix was open to misunderstanding. However, there has also been a difficulty as to the extent to which both local boroughs and the Mayor have not paid full regard to the matrix. The London Plan has a monitoring indicator that 95 per cent of developments should be within the appropriate density range.

As the table below shows, in the first two years of the London Plan being in effect, nearly two thirds of units consented were over the appropriate range. Figures for 2006/7 just published by the GLA in the fourth London Plan Annual Monitoring report, show this figure as reducing to 32 per cent.

Map 1 shows actual scheme densities for 2004/5 relative to density guidance – the black spots sowing schemes over range, the white spots the schemes under range – with schemes within range shown as 'hol-

low' spots.

The fact that the number of schemes over range in 2006/7 was lower is clearly positive news and implies that more development now complies with the principles of Sustainable Residential Quality (SRQ) set out in the Plan. The overall average development density figure – only up from 131 dph to 136 dph would also appear to show that the trend to hyperdensity is now easing off. However, the issue of in what circumstances, 'overdevelopment' or for that matter 'underdevelopment' is justified is still problematic. The URS research report did consider this issue, and it is hoped that some of the guidance in that report will be included in the forthcoming revised version of the Mayor's Housing Supplementary Planning Guidance.

There is a way of ensuring housing outputs in London are closer to the London Plan targets - build at medium densities of 70-150 dwellings a hectare which allows you to get both a good tenure mix and provide some family housing – this means increasing development densities in suburban areas, but limiting tower block development to top of the market central London sites, where profits can subsidise at least an equivalent floorspace of family sized social rented housing on a >>

Table 8 Planning consents since Plan adopted

	2004/5	2005/6	2006/7
Above range	62 %	65 %	32 %
Within range	31 %	28 %	50 %
Below range	8 %	7 %	18 %

The Planning Bill

Striving still to shape the nation

"The thing that hath been, it is that which shall be...there is no new thing under the sun". Andrew Rogers quotes Ecclesiastes ch. 1, v8.



Clearing out my files for the New Year I came across the CBI Planning Task Force's report of 1992 entitled *Shaping the Nation*. As I leafed through it I realised that it seemed rather familiar, particularly when I came to its Recommendations for the decision

making process.

"Decisions should be taken at the appropriate level" stated the CBI report, published at the height of the Tory government. "Decisions are not always being taken at the right level" says the Planning White Paper published in 2007 by New Labour.

"Each local planning authority should prepare its own Planning Charter, setting out its commitments

>> more appropriate site. Government needs to pay a much higher level of subsidy than the current £105,000 a rented home, to get more family housing and to get rents and service charges down. The Treasury is still assuming a new home will somehow cost less subsidy. When build costs are increasing at 10-15 per cent a year climate change adaptation costs can add on £30,000 a unit cost, and prime sites can cost £50- £100m a hectare, this is bluntly ludicrous. In central London, and other high value areas,

grant at £150,000 to £200,000 a home would be more realistic. Finally if Government is serious about sustainable communities as well as saving the planet, the Government needs to pay for the transport infrastructure, hospitals schools and leisure facilities, rather than load the cost onto developers, which just inflates house-prices and rents.

Most of the Mayor's and Government policies for increasing housing supply are right in principle, but unless Government pays for them, we are not going to get the quantity and quality of homes we need.

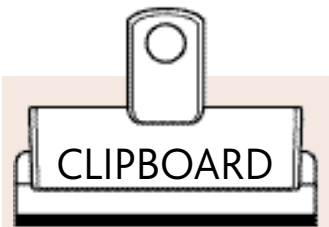
to customers of the planning service..." (CBI). "Our aim is to improve actual community engagement in planning..." (White Paper).

"For major projects decided upon at national level... it should not be possible to challenge the need for that project..." (CBI) "We consider that decisions on individual applications should be taken within the framework of the national policy statement..." (White Paper).

"For applications which conform with the relevant Development Plan the scope for challenging the need for that project should be limited to material local considerations" (CBI) "We are committed to ensuring that decision making is taken at as local a level as possible so that it can fully reflect local circumstances and need" (White Paper).

The thrust of the CBI report is clearly reflected in the current Planning Bill. And the DCLG has just announced yet another "red tape busting review" to find ways of improving the planning service. The CBI knew how to do that in 1992. Indeed, studies of the bureaucratic hurdles in the planning system have been produced with monotonous regularity since about 1948. What re-reading the CBI report showed me is that, however keen the desire for a more efficient system, and however thoroughly it is analysed, unless there is real political will and a proper allocation of resources, very little actually changes...

On 25 March a 'red tape busting review to weed out bureaucratic hurdles and create a more efficient planning service for the public and business', was launched by Communities Secretary Hazel Blears, Business Secretary John Hutton and Housing and Planning Minister Caroline Flint. See page 5.



£4.5 billion application

Plans for one of the biggest regeneration schemes ever undertaken in London have just been submitted to Barnet Council. The £4.5 billion regeneration is designed to provide a new gateway to the capital and a vibrant new urban quarter in Barnet.

The plans for a whole new town centre based around Cricklewood and Brent Cross would create 27,000 jobs, 7,500 homes, 3 schools, new health facilities, high quality parks and open spaces, and investment of more than £400 million in improving transport.

The proposals from development partners, Brookfield Europe (formerly Multiplex), Hammerson and Standard Life Investments, also include a commitment to pioneering standards of environmental sustainability. The scheme aims to be the first in the UK to combine automated waste collection through a network of underground pipes, linked directly to a new waste handling and recycling facility. The waste collected would produce fuel for a combined heat and power plant on site.

The holy rail

"Gordon Brown has announced that work will begin on Crossrail, a 74-mile rail link between west and east London, in 2010. The first trains could be running by 2017.

First mooted by Margaret Thatcher in 1989, Crossrail was endorsed by her successors but stymied by its £16 billion price tag. Now Heathrow Airport, the City of London corporation and the Canary Wharf group, all of which stand to benefit from the rail link, have agreed to contribute to its construction. Other funding will come from the government, from borrowings against future fare revenue and from a levy on businesses."

Crossrail's go-ahead as reported in *The Economist* city report

Map 1
Scheme densities in relation to density guidance

