

Dear Mr Barry-Pursell,

DRAFT HOUSING SPG: COMMENTS BY THE LONDON FORUM OF AMENITY AND CIVIC SOCIETIES

The London Forum of Amenity and Civic Societies strongly welcomes the revised SPG on Housing and I attach our comments.

Housing Capacity and Density

The London Forum **strongly supports** the London Plan policies for housing, in particular the approach to establishing housing capacity, including the policy of optimising the potential of sites using the density matrix and its wide density ranges to determine the appropriate density range and how other factors, such as design and local setting, influence where within the range density should be set.

At the Examination in Public on the London Plan we made clear our strong support for the density matrix as both one of the most sophisticated and, at the same time, robust tool in the London Plan toolkit. The “appropriate density ranges” are wide. The main factors – broad setting and public transport accessibility – establish the wide density ranges and other factors help position a site within that range.

Our main concern – and our continuing concern – is not the policy but the practice. Despite the change in the London Plan from “maximising” to “optimising” the potential of sites, and the built-in caveats with regard to design principles, maximisation of build density has continued to be applied by developers and the GLA decisions unit. There is now a major disparity emerging between policy and practice, especially in Opportunity Areas, such as White City, Earl’s Court/West Kensington and Vauxhall/Nine Elms/Battersea.

The extent of the mismatch between the policy target (Key Performance Indicator 2 – that more than 95% of new residential development is to comply with the housing density location and density matrix [Table 3.2]) and the outturn was first exposed in the review of the density matrix in 2006. This showed that only 23% of schemes had densities within the appropriate density range for the site, with 67% being above, often significantly above, the maximum of the appropriate density range. Successive annual monitoring reports show that the proportion within the ranges has failed to improve to any significant degree.

The excessive bulk and height of developments which are above the density range is unacceptable and the living conditions within them often fail to meet standards for daylight, overlooking, private amenity space and children’s play space, which should be in accordance with the Mayor’s SPG on the latter subject. It is also contrary to the LP Policy 3.3 for better quality accommodation.

We are pleased to see that the new SPG makes clear (paragraph 1.3.6) that in future “Unless additional reasons to justify exceeding the top of the appropriate range can be demonstrated rigorously, they should normally be resisted.”.

We **strongly support** this approach and have seen no evidence presented for densities, particularly in Opportunity Areas, to exceed the top of those ranges. Indeed, if densities continue to exceed the top of the range for these major areas, it would significantly undermine the achievement of the target in Key Performance Indicator 2.

We have proposed changes to the Executive Summary and to Part 1 of the SPG to clarify this issue, particularly paras 1.3.4, 1.3.6, and a new paragraph after para 1.3.29.

We are worried that current practice is undermining the London Plan policy in the White City, Earl’s Court/West Kensington and Vauxhall/Nine Elms/Battersea Opportunity Areas. It would appear that these **current** schemes are being assessed against the “maximising” policy of the 2008 London Plan rather than the “optimising” policy of the 2011 London Plan. It is time for practice to catch up with the policy.

Housing Choice

The London Forum **strongly welcomes** the guidance on planning for specific groups – families in need of affordable housing, disabled and older people, the accommodation needs of particular occupation groups, students and gypsies and travellers. This additional focus is welcome but will require take up by the Boroughs and a real attempt to monitor progress.

Housing stock and investment

The London Forum is concerned that some of the changes in London’s housing stock do not result in more homes for Londoners – whether through deconversion, the growing number of “non-primary residences” (second homes does not quite capture the phenomenon) and pressure for tourist accommodation. We consider that the “leakages” need to be recognised and monitored.

In addition to these general comments, which are elaborated in our attached submission, we have proposed a set of changes to the document to meet them.

If any of this is not clear, please contact us.

Yours sincerely,
Michael Bach, Chairman: Planning and Transport Committee, London Forum