

**The Effectiveness of the UK Planning System  
in Delivering Sustainable Development  
via Urban Intensification**

**by**

**Katie Williams**

BA Hons Dip UD Dip UP MSc MRTPI

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The purpose of this research is to establish whether the land use planning system in the UK is capable of delivering a sustainable urban form via the process of *urban intensification*. Sustainable development is usually defined as '...development which meets the needs of the present without compromising the ability of future generations to meet their own needs.' (World Commission on Environment and Development, 1987). Urban intensification is a process whereby existing towns or cities become more densely built up and more intensively populated and used. The process has been promoted in the UK over the last decade or so in land use planning policy because it is seen as furthering sustainability objectives. However, there appears to be a gap in knowledge about whether intensification policies, when implemented, actually contribute to sustainability. Thus, this research attempts to answer two questions: will the urban intensification policies that are in place lead to a sustainable urban form, if implemented; and can the land use planning system alone implement these policies?

To answer these questions an evaluation of policy performance and an implementation study were required. The methodology for the evaluation study is an adapted balance sheet which provides a framework for a structured analysis of intensification policies across the three main interests in planning: economic, quality of life and environment. The implementation study consists of interviews with those operationalising intensification policies, reviews of policy and observations of policies in action. These methodologies were carried out in case studies of three London boroughs. They identified the intensification policies that had been used, their impacts and how they had been implemented over a ten year period.

The findings of the research have significant implications for the potential of intensification policies to realise sustainable development. The evaluation study found that such policies can contribute to achieving forms of urban development which are sustainable in their use of land and which enable opportunities for sustainable patterns of use, but that the planning system cannot guarantee these opportunities are realised, due to a host of intervening variables which lie outside its remit. The implementation study found that the planning system could implement intensification policies without any major changes to it, but only if it adopts new 'tools' to help relate individual planning decisions to sustainability targets, ensures legal consistency through all the tiers of planning, develops new working coalitions and promotes increased public awareness of sustainability.

The overall conclusion to the research asserts that a revised definition of sustainable development, applicable to urban intensification, is required and offers such a definition. It states that intensification should produce development which is both 'technically' sustainable (e.g., in terms of air quality and infrastructure capacity) and acceptable to urban residents. It also suggests that the integration of the findings on policy content and implementation, if combined with a better understanding of locality, will help the planning system achieve sustainable development via urban intensification.

**This thesis is dedicated  
to my parents.**

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ABS	Adapted Balance Sheet
CEC	Commission of the European Communities
CHP	Combined Heat and Power
CPRE	Campaign for the Protection of Rural England
DC	Development Control
DETR	Department of the Environment, Transport and the Regions
DoE	Department of the Environment
DoT	Department of Transport
EARA	Environmental Assessment of Residential Areas
EC	European Commission
GIS	Geographical Information Systems
GLC	Greater London Council
GLDP	Greater London Development Plan
GOL	Government Office for London
GP	General Practitioner
HMO	House in Multiple Occupation
LA	Local Authority
LA21	Local Agenda 21
LAQN	London Air Quality Network
LBB	London Borough of Bromley
LBC	London Borough of Camden
LBH	London Borough of Harrow
LPA	Local Planning Authority
LPAC	London Planning Advisory Committee
LRC	London Research Centre
MOL	Metropolitan Open Land
MP	Member of Parliament
NIMBY	Not In My Back Yard
PPG	Planning Policy Guidance
RPG	Regional Planning Guidance
SCBA	Social Cost Benefit Analysis
SERPLAN	South East Regional Planning Conference
SSE	Secretary of State for the Environment
UDP	Unitary Development Plan
UK	United Kingdom
UNCED	United Nations Conference on Environment and Development
WCED	World Commission on Environment and Development

# Part One

# **Chapter One: Urban intensification**

# Chapter One: Urban intensification

## 1.1 Introduction: the purpose of the research

The purpose of this research is to establish whether the land use planning system in the UK is capable of delivering a sustainable urban form<sup>1</sup> via the process of *urban intensification*. In the past decade much has been made of the importance of the concept of sustainability throughout the world. The desire to achieve development which 'meets the needs of the present without compromising the ability of future generations to meet their own needs' (World Commission on Environment and Development [WCED], 1987, p.43) has gained in importance due to threats from population growth, wasteful use of non-renewable resources and growing social inequalities. A major strand of the sustainability debate arises from the recognition that cities are the locus of both some of the main problems and the solutions to sustainability (Elkin *et al.*, 1991; Breheny, 1992a; Haughton and Hunter, 1994; Jenks *et al.*, 1996). They are places where human activity is most concentrated and are thus the areas which inflict the heaviest impacts on the natural environment. If cities can be made more sustainable, then a great contribution will have been made to achieving a more stable global future.

Consequently, many aspects of urbanism have been studied in the context of sustainability: urban economies (Pugh, 1996), social structures (Roelofs, 1996), environmental planning (Kozlowski and Hill, 1993) and urban management (Gilbert *et al.*, 1996; Carley and Christie, 1992) have all received attention. Interest has also turned to the question of whether the arrangement of a city's physical elements, and the intensity of its use, affect its capacity to function in a sustainable way: can urban form itself render a city more, or less, sustainable? Responses to this question have been varied, and remain contentious. However, that there is a relationship of some kind between urban form and sustainability is now generally accepted. As Breheny and Rookwood argue, 'It is clear that a major strategic factor determining sustainability is urban form; that is, the shape of settlement patterns in cities, towns and villages' (1993, p.151). What this link may be is less certain, and much research has been undertaken to explore the implications of a number of facets of urban form, namely size, shape and density (Owens, 1986a, 1986b; Rickaby 1987; Rickaby *et al.*, 1992; Newman and Kenworthy, 1989).

In Europe, one favoured solution is dominating discussion and research and, importantly, policy. Whilst agreement on this urban form is far from unanimous, the preferred solution is the 'compact city', which has firm roots in the European tradition of city form. Exact definitions of the compact city are hard to pin down, and are likely to conflict in detail (Lock, 1995; Thomas and Cousins, 1996a), but essentially what is meant is a high density, mixed-use urban area, mirroring the form and functions of many historic European towns and cities (Commission of the European Communities [CEC], 1990).

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<sup>1</sup>For a definition of sustainable urban form see 1.5.



This urban form is being pursued because it is argued to have many benefits in terms of sustainability. It is argued to be environmentally sustainable, predominantly because it offers opportunities for emissions-efficient modes of transport such as walking, cycling and public transport, hence reducing dependence on car travel (Elkin *et al.*, 1991; Sherlock, 1991; ECOTEC, 1993). Furthermore, by building on brownfield sites<sup>2</sup>, the countryside is protected because the pressure for development on rural and agricultural land is relieved (Burton and Matson, 1996; CPRE, 1996; Elkin *et al.*, 1991). It is also claimed to allow energy-saving opportunities for new technologies, such as combined heat and power systems (HM Govt, 1994; Elkin *et al.*, 1991). Furthermore, higher density settlements are argued to be socially sustainable because local facilities and services can be maintained due to high population densities, and therefore accessibility to goods and services is more equitably distributed (Sherlock, 1991; Elkin *et al.*, 1991; Pacione, 1989). Quality of life is argued to be good, because high density urban living is seen as a prerequisite for vitality, vibrancy, cultural activities and social interaction (CEC, 1990; Jacobs, 1961). Some have also claimed it creates economic benefits (HM Govt, 1994; Hillier *et al.*, 1992; Maher, 1993; Mowbray, 1994). The high densities associated with the compact city can provide the concentrations of people to support local businesses and services, and therefore maintain, and in some cases rejuvenate, local economies. Economic benefits to local government are also claimed because services and infrastructure can be more economically provided in higher density areas (Newman, 1992).

However, if the compact city model is to be pursued, then two scenarios need to be considered: new settlements could be built at higher densities than at present, or existing settlements could be made more dense. Whilst in the UK there will undoubtedly be a demand for some new settlements, it is unlikely that they will be able to meet all the demands for new development in the future, due mainly to political opposition. Therefore, it is the latter of these scenarios that is likely to be chosen as the principal way of implementing the compact city. This means that most existing towns and cities may have to accept continued development at higher densities, and increasing populations; a process often referred to as urban intensification.

Exactly what changes are implied in the process of intensification should be considered. Intensification, or 'consolidation', as it is sometimes termed, has been described as a process '...which takes the existing urban form - whatever that is - and makes it more dense, with more people and dwellings on the same area' (Minnery, 1992, p.23), and as 'the increase of population and/or dwellings within a defined urban area' (Roseth, 1991, p.30). These definitions convey a combination of changes in built form and activity. Research on intensification for the UK government has elaborated these definitions and broken down the generic descriptions into a number of distinct processes (DETR, forthcoming). The changes affecting built form are listed as: development of previously undeveloped urban land,

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<sup>2</sup>'Brownfield' is a term used to describe undeveloped land within urban areas. It refers to land which is vacant or disused or re-used, as opposed to green sites, such as parks and metropolitan open land. It is contrasted with greenfield land which is undeveloped land in out-of-town locations.

redevelopment at higher densities of existing buildings or previously developed sites, subdivisions and conversions, additions and extensions. In terms of increased amounts of activity, changes such as the increased use of existing buildings or sites, changes of use - where an increase in activity results - and increases in the numbers of people living in, working in, or travelling through an area are identified. Thus intensification is not a single change, but a combination of processes through which existing built up areas become either physically more dense and/or used more intensively.

In the UK the achievement of the compact city, through the process of intensification, is being promoted as part of the UK's Strategy for Sustainable Development (HM Govt, 1994). Whilst the success of this initiative depends upon action in a number of fields of public policy, responsibility for implementing the compact city, in the formal policy context, lies with the land use planning system. By following central government guidance when producing development plans, and exercising powers over local development, through the development control process, the land use planning system is the means by which sustainable settlement patterns are to be delivered. Other organisations have their part to play, for example public transport providers and other local authority departments, but the main decisions on the location and density of new development, and changes to existing developments, are mediated by the land use planning system, under the current system of policies and powers.

Since the late 1980s the planning system has introduced policies in line with the objectives of sustainable development, and currently there is a range of planning policies in place which direct development to existing urban areas and encourage urban intensification. For example, central government's strategy for sustainable development (HM Govt, 1994) clearly urges local authorities to favour urban intensification, and the housing White Paper *Our Future Homes: Opportunity, Choice, Responsibility* (HM Govt, 1995) set, for the first time, a target for brownfield development. It suggested that 50% of all development should take place on re-used sites. The latest Green Paper *Household Growth: Where Shall We Live?* suggests this target may be raised further, and asks for comments on the practicability of an aspirational target of 60% (HM Govt, 1996). The UK Round Table for Sustainable Development (1997) has since proposed an increase to 75%.

The most significant changes for planning, however, have come in the form of revised planning policy guidance notes (PPGs). Of these, the revision of *PPG13: Transport* (DoE and DoT, 1994) is probably the most important. It entrenched in planning policy the need to consider the trip-generating effects of the location of development. Its main aims were to locate development where it would reduce the growth in the length of motorised journeys and encourage less environmentally damaging means of travel. Essentially this meant locating development, wherever possible, within existing urban areas or near existing facilities and transport nodes. Changes to *PPG3: Housing* (DoE, 1992a) to reinforce the need to use brownfield sites, and to *PPG6: Town Centres and Retail Development* (DoE, 1993c) to reflect

the new policy approach to development in the interests of reducing transport emissions are also significant (Winter, 1994). Revisions of *PPG1: General Policy and Principles* (DoE, 1992e), and *PPG12: Development Plans and Regional Guidance* (DoE, 1992d) are also important as they incorporate principles of sustainable development into plan-making and development control procedures.

These policy changes acquired an added importance in 1995 when the DoE published its projections for household growth up to 2016 (DoE, 1995c). The figures were far higher than previous projections, and stated that an additional 4.4 million homes would be needed over the next 20 years in the UK. The underlying population is projected to increase by 3.6 million over the same period. The extra demand by households is largely accounted for by the diminishing average household size brought about by structural changes in the population, such as a sharp increase in one person households (80% of the projected increase). The publication of these figures has prompted a new round of discussions on locational options for the dwellings required to meet the increased demand, and the merits of different development alternatives at national, regional and local levels have been studied (Breheny and Hall, 1996). Within local planning, the figures have given a new urgency to implementing intensification policies. Central government's advocacy of urban intensification as a way of achieving sustainable development implies that local authorities should now be in the process of identifying sites and accounting for land in towns and cities to accommodate the projected demand for housing in their areas. They should also be strengthening policies in their local development plans to raise residential densities and use the existing housing stock more intensively.

It seems then, that urban intensification is firmly established as a significant means of achieving sustainable urban forms in the UK. It is entrenched in land use policy guidance, and forms a major part of the UK's strategy for sustainable development. It is also one of the main policy options for meeting the demands of the projected growth in household numbers. Therefore, if Local Planning Authorities (LPAs) are following central guidance, the UK's towns and cities should now be becoming more intensively used and built-up. They should be moving towards higher average densities than before, with more people living in housing which already exists, more people working in towns, and more people visiting for leisure and cultural activities. Consequently, if the policies are working as claimed, it may be reasonable to expect that, by now, some cities and towns are beginning to enjoy some of the benefits associated with intensification, such as reduced car dependence, better public transport, stronger urban economies and improved social and cultural facilities.

However, if intensification in the UK is considered, a major contradiction emerges between the idea of the compact city in policy, and the reality of its experience. The common perception of urban life is not the romantic vision of the vibrant traditional European city described by the CEC, but one often characterised by traffic congestion, poor environmental quality, loss of open spaces and 'town cramming' (Davison, 1995; Knight 1995). Further, research into

intensified areas in the UK indicates that higher densities of population and built form may not be producing the benefits suggested by those in favour of the compact city, and that, in fact, many people living in these areas argue that the changes have had a detrimental effect on their neighbourhoods (DETR, forthcoming). Urban residents in many towns and cities, especially in growth areas such as the South East, feel that their towns are 'overheated', and that they cannot accommodate any more development (*op cit.*). Moreover, many planners have expressed similar views, and have resisted continued development on the grounds that it has a harmful effect on environmental quality and puts strains on local amenities (Breheny, 1992b). Some counties have even dismissed central government's housing allocations on the grounds that they simply cannot accommodate further high levels of development without breaching a capacity of some type, either in terms of environmental resources, social facilities or infrastructure<sup>3</sup>.

This divergence between compact city theory and experience has been a central theme addressed by planning theorists. The debate surrounding intensification policies has long questioned their desirability and, as more investigations are undertaken, it is becoming apparent that many of the basic premises upon which compact cities are argued to be sustainable may be contradictory or, at least, unsubstantiated by research (Stretton, 1996; Breheny, 1992b). Several writers have argued that urban intensification policies are riddled with contradictions (Breheny 1992b; Williams *et al.*, 1996). A brief review of contradictions and problems, drawn from the current debate in planning theory, serves to identify some of the key difficulties involved in achieving a sustainable urban form via urban intensification. Such a review is important as it reveals the breadth and complexity of contradictions surrounding the government's most significant planning policy for achieving sustainable urban development.

By reviewing existing literature it became apparent that the contradictions and problems can be characterised by the distinction, long established in planning thought and policy analysis, between policy content (substance), and the way in which policies are implemented (process) (Healey, 1995). Although the separation into substantive and procedural elements may appear to over-simplify the nature of the relationship between policies and implementation (Barrett and Fudge, 1981), it is useful as it facilitates a detailed conceptualisation of the contradictions. However, it does not preclude a more integrated analysis at a later stage. This review begins, then, with a brief overview of the contradictions and problems inherent in the policies themselves, and then proceeds to issues of process or implementation.

### **1.2 Contradictions and problems within policy content (substance)**

The most fundamental criticism of urban intensification policies is that they simply do not deliver the benefits which they claim (Minnery, 1992; Davison, 1995). There are serious questions about whether the range of objectives can be achieved by following policies to

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<sup>3</sup>In 1995 Berkshire increased its housing provision, even though county planners argued this would be detrimental to the county. Hertfordshire is currently planning for greenfield developments, after concluding that its urban areas are full. A similar situation faces East Sussex, where planners set a low figure in their Structure Plan, but are facing pressure to revise it upwards.

encourage higher densities of buildings and people. The reasoning in compact city policies is that by developing at higher densities certain benefits will be achieved in terms of sustainability, but outside the policy-making environment there is little consensus regarding the merits of more compact urban forms. Many policy theorists have argued that, for policies to be successful, the link between action and outcome must be clear, i.e. if X is done, then Y will happen (Hogwood and Gunn, 1984; Pressman and Wildavsky, 1973; Reade, 1982). However, for some aspects of intensification policy, it seems that policy-makers can, at best, only argue that if X is done they hope Y will come about. Others argue that increasing urban densities will not necessarily bring about the benefits suggested, because the chains of cause and effect are unsubstantiated (Minnery, 1992). As Minnery argues, 'There is increasing doubt that the range of financial, social and environmental objectives currently associated with urban consolidation can be fulfilled on a metropolitan scale with a strategy based primarily on density' (*op cit.*, p.26). This doubt appears to be validated by research into intensified areas in the UK; it found that they are yet to witness many of the intended range of benefits (DETR, forthcoming).

Another serious problem is that intensification policies are said to contain internal contradictions (Breheny 1992b, Williams *et al.*, 1996). These contradictions are evident both horizontally, between various issues within the urban environment, and vertically, between scales, or levels, of planning. A major source of this problem is that the reasoning behind many compact city policies has been drawn from single-issue research. In particular, environmental concerns have been dominant, and of these transport issues have gained most attention (Banister, 1994; Farthing *et al.*, 1996; Barrett, 1994). But, in reality, it seems that compact urban forms may be more sustainable for some issues, but less so for others. For example, they may have the potential to reduce trips by car by increasing built-form densities and clustering trip-ends, but the subsequent loss of urban open space may mean a reduction in ecologically important land. Research has shown that intensification has a huge number of impacts on very different issues, and that impacts and their side-effects may be unforeseen if investigations are focused on single issues (DETR, forthcoming). Furthermore, the side-effects, or unintended consequences of policies, may outweigh the benefits in terms of sustainability, and this could mean that cities are less, rather than more, sustainable.

Contradictions appear between different scales of planning for a similar reason: a single level perspective is rather like that of a single issue. Much of the reasoning behind compact city policies is aimed at meeting strategic goals and addressing global or national issues, such as reducing emissions, or protecting rural land. But these centrally determined strategic goals require local solutions, and increasing densities in towns and cities often causes local problems such as increases in the volume of urban traffic and localised air and noise pollution (Kenworthy, 1992). These trends clearly do not aid sustainability.

A further problem is that intensification policies do not adequately address the cumulative effects of intensification (Burton *et al.*, 1996). This is an important omission, as urban

intensification is an incremental process which may have a limit. Whilst policy guidance warns of 'town-cramming' and 'over-development' (DoE, 1992a), there is no systematic way of evaluating the cumulative effects of policies, because monitoring is not part of policy design either centrally or locally. This is a cause for concern because, as Jacobs states, '...overall, environmental quality has continued to get worse, because individual controls are not enough to regulate cumulative effects.' (1993, p.15). Many attempts have been made in recent years to define limits to development in urban areas, or 'capacities' (Arup Economics and Planning *et al.*, 1995; Llewelyn-Davies, 1994; Jacobs, 1997), but these are still at a relatively early stage of development<sup>4</sup>. The problem with which local authorities are faced is how to know when intensification has reached an optimum level, in terms of sustainability, but as yet there is little guidance available.

Local authorities not only have to judge how much intensification is sustainable, they also have to decide what form that intensification should take (Burton *et al.*, 1996). Policies are criticised for prescribing urban intensification as a contributor to sustainability with little, or no, definition of the processes which this may entail, or attention to the differences in types of area in which it is prescribed (Minnery, 1992). As the Introduction highlighted, intensification can take a number of forms, some of which may be more appropriate in a given area than others, and research has shown that the existing characteristics of an area are crucial in determining the type and extent of intensification acceptable to urban residents (Minnery, 1992; DETR, forthcoming). Hence, to simply encourage urban intensification as a blanket solution may be too simplistic.

Overall, the range of contradictions within policy substance casts some serious doubts on the potential of urban intensification as a tool to achieve sustainable development. There is little agreement on whether the policies will have the planned outcomes, and little agreement on whether these outcomes, even if achieved, are sustainable for all elements of the urban environment, at all scales of planning. What the review shows clearly is that the effects of intensification policies are far more complex and far-reaching than the policies themselves suggest.

### **1.3 Contradictions and problems within policy implementation (process)**

Whilst the issues associated with policy content are fairly well developed in literature, those of process are less researched. It appears that those involved in implementing intensification policies are aware of the difficulties, but that these have not yet formed part of the formal debate. Nevertheless, questions of whether the planning system can actually bring about the compact city in the current political, social and economic climate, and whether it can manage its impacts, are crucial if sustainable cities are to become a reality rather than a theoretical concept. The lack of attention that implementation has received is surprising, considering the

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<sup>4</sup>See Grigson (1995), Packer (1995) and the UK Round Table on Sustainable Development (1997) for a review and critique of capacity approaches.

indications from planning practice that the planning system, in its current form, may find it hard to deliver compact towns and cities (Winter, 1994). As Lock says:

... there can be no doubt about the thrust of policy to encourage urban intensification, nor any doubt about the political attraction in avoiding the need to take green fields for new housing development. The pressure is therefore on the planning system to encourage intensification: but how? (Lock, 1995, p.176)

The inconsistencies that are coming to light focus on two issues in implementation. First is the issue of whether the planning system can have any real power over the extent of the process, particularly whether it is powerful enough to direct development to existing urban areas in the UK when developers' preferences seem to be for greenfield sites. Second is the issue of whether planning can manage the subtleties of intensification, where it is happening, to ensure the benefits suggested in policies are delivered, and the negative impacts minimised. Each of these matters are complex. Therefore the review presented here represents a very brief summary of areas of concern<sup>5</sup>.

First, on the question of whether the planning system can be used to direct development to urban areas, it has been argued that, in many areas of the UK, urban intensification will only occur if more resources are made available to make vacant urban sites more attractive to the market (Fulford, 1996; The Housebuilders Federation, 1996; DoE, 1992a). Brownfield sites are, in most instances, more costly to develop than greenfield, and therefore developers (especially those specialising in housebuilding) argue that they require added financial assistance to develop on inner urban sites (Fulford, 1996). Whilst several initiatives have been implemented over the last decade to encourage developers to brownfield sites<sup>6</sup>, their effectiveness can be questioned, as the total amount of derelict urban land in the UK is still increasing (DoE, 1995a)<sup>7</sup>.

Second, there is the question of whether local authority planners can implement urban intensification policies to support the aims of sustainability when they are often impeded because of the decision-making and organizational structures within the planning system (Whitehand, 1989). Decisions on policies to be included in national guidance, regional guidance and local plans are always political in nature, as are decisions on individual planning applications in development control. By mediating between competing interests the planning system is placed in a position of attempting to look as if it is acting 'rationally' when it is subject to political pressures at all levels. Urban intensification policies are particularly affected by decision-making and organisational structures because of the contradiction outlined above,

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<sup>5</sup>Chapter Five gives a full account of issues of implementation.

<sup>6</sup>Schemes and programmes have included Derelict Land Grant, Single Regeneration Budget, City Challenge and English Partnerships.

<sup>7</sup>The fact that the total amount of derelict urban land has increased does not necessarily mean that intensification policies are not being implemented. It may be that rates of dereliction are faster than those of reclamation.

namely that intensification policies are devised to meet mainly strategic aims, but have to be carried out at the local level. For this reason, although planners often agree with strategic aims, councillors, who actually make decisions on the majority of planning applications affecting intensification, often oppose intensification on the grounds that it is locally undesirable (Winter, 1994; Whitehand, 1989). Similarly, other departments within the local authority, such as environmental health, housing and engineering, might also have some responsibility for enabling more intensive development for example, by way of applying standards. Unless they are fully aware of, and support, the aims of sustainability via intensification, then implementation may prove difficult.

Third, there is a major contradiction, in the assumptions underlying policies, about the socio-economic context in which urban intensification is planned to happen. Of all the contradictions related to implementation, this has received the most attention in urban intensification literature, and provides, for many, the major barrier to implementation (Breheny, 1992b; Davison, 1995). The point is that intensification policies are based on attracting people to live in towns and cities but in the UK post-war experience has been of continued out-migration from urban areas for both residential and employment uses. The success of compact city policies relies on people choosing to stay in, and move back into, urban areas, and is therefore dependent on a shared set of values about the benefits of urban life. Yet there is little evidence that British people view city life in the same way as, for example, many continental Europeans. As McKie (1996) and Lowe and Petherick (1989) argue, British aspirations are for a detached house in the country or suburbs rather than a city centre apartment.

Whilst demographic trends are for smaller households, which are seen as more likely to favour urban locations, and signs of re-urbanisation have been identified in some of the largest cities (Lever, 1993), there would have to be major changes in culture and personal aspirations before those who can choose where to live move on a scale large enough to reverse the existing trends. In fact, Breheny and Rookwood have gone as far as to describe the aim of achieving the compact city as a 'Canute-like proposal' (1993, p.155). The (apparent) preference for suburban locations is, however, used constantly by the development industry as justification for its continued out-of-town developments. It argues that it is merely responding to demand for out-of-town housing, shopping and leisure facilities, and that people do not want to live in city centres, and are proving this by buying into a suburban lifestyle (Mulholland Research Associates, 1995).

In answering the question of whether planners can manage intensification where it is happening, it appears that issues of resources and power dominate. It has been argued that many of the benefits associated with compaction may only be assured if more investment is forthcoming (Smyth, 1996). The most obvious need of investment is in public transport, but other measures needed to mitigate the impacts of higher densities may also be reliant on increased funding - for example improved sound proofing, street cleaning and urban open space



management. Much of the theory supporting the compact city argues that these benefits will be provided through private finance, which will be forthcoming because of increased land values, or through private and public sector savings on infrastructure and services, which are argued to be cheaper in compact cities (Maher, 1993). However, this has yet to be tested in the UK.

Concern has also been voiced that the instruments available to the land use planning system to manage intensification are not sophisticated or powerful enough to ensure that the planned benefits are achieved, and the negative impacts kept to a minimum. In particular, development control is not seen as an appropriate tool because many of the impacts of consolidation lie outside the traditional land use remit. For example, there is scepticism about planning alone being able to deal with problems of increased traffic and pollution, overstretched services and environmental wear and tear. In short, there is little confidence that planning can improve cities enough, through intensification, to encourage people to live in them (Best 1981; Gossop, 1995; Davison, 1995). The CEC acknowledges this problem when it states that:

Effective management of our urban environment requires a strategy based on an overview of the urban system, with integrated decision-making in key areas. Few cities possess an administrative structure that can ensure such integration ... (CEC, 1990, p.24)

In conclusion, it appears that the implementation of compact city policies is fraught with contradictions and difficulties. The power of a planning system to ensure intensification when it is, for the most part, reacting to private development proposals, in which the private sector is less than keen to develop brownfield sites, must be questioned. The ability to implement policies, through a process of local democracy, which are seen by urban residents as largely detrimental at the local level must also be viewed with some scepticism. Finally, the reliance on the planning system to manage the consequences of intensification, many of which lie outside the scope of land use planning, is surely unlikely to deliver the intended policy outcomes.

### **1.4 The research problem**

The two sources of contradictions presented above - the content of the policies and their implementation - create a contradictory picture concerning intensification in the UK. Within intensification policies, as expressed in PPGs and other central policy statements, the aims and intended outcomes appear relatively clear. Yet the presentation of the contradictions reveals a number of crucial concerns about their desirability and feasibility. In some instances the problems seem to be so great that, to many involved in both planning practice and research, the concept of the compact city as a means of delivering a sustainable urban form is destined to fail (Davison, 1995; Knight, 1996). Nevertheless, at the European level, the CEC is arguing for principles to apply to all urban areas, based on their concept of the compact city (CEC, 1990), and in the UK, as stated above, urban intensification policies are already in place.

That these policies are being pursued when understanding of their consequences is so limited may prove detrimental to the achievement of sustainable urban form. If the policy makers are wrong in their assumptions about the benefits of intensification, or do not recognise the importance of how they are implemented, then urban areas could suffer from the negative effects associated with 'town cramming'. Conversely, if there are benefits to be gained, then by not implementing intensification policies, or mis-applying them, a real chance of achieving sustainable settlement patterns for the future may be missed. What is certain at this stage though is that the outcomes of intensification policies are far from clear, and there is an urgent need for research which investigates the feasibility of the policies, and their implementation in the UK. As Breheny states, '... a legitimate, indeed profound, research question is whether such compaction - "the compact city" - will deliver the gains demanded by the politicians.' (1996a, p.13). The research problem is, therefore, that:

**There is a gap in knowledge about whether intensification policies when implemented actually contribute to achieving sustainable development.**

### **1.5 The research aims**

This research takes the above discussion (1.1-1.4) as its starting point. It focuses first, on whether the policies themselves are the 'right' policies: whether they are likely to produce the goal of the sustainable city, and second, on whether they can be implemented in the UK, given the nature of the planning system and the broader socio-political, and cultural context in which it acts. Therefore, to clarify the aims of the research, two questions are formulated.

In terms of policy substance the research aims to answer the question:

- **Will the urban intensification policies that are in place lead to a sustainable urban form, if implemented?**

and in terms of process:

- **Can the land use planning system alone implement these policies?**

Posing these questions immediately requires some definition of the terms used within them. It is necessary to define how policies are defined in the research, and also how 'sustainable urban form' can be characterised.

#### **1.5.1 A definition of policy**

The word 'policy' has a variety of meanings (Hogwood and Gunn, 1984, p.13). One is as a label for a field of activity. For the purposes of this research urban intensification is seen as forming a distinct policy field in which government's intentions are derived from a number of legislative tools: they are not bound up in a single strategy or source (Pearce, 1992). The sources of planning aims concerning urban intensification include Government Strategies (e.g. the UK Strategy for Sustainable Development, HM Govt, 1994), White Papers (e.g. Our Future Homes, HM Govt, 1995), PPGs, regional strategies, local development plans and a host of other sources specific to certain localities (e.g. supplementary planning policies). These policy sources vary

in their legal status. For example, PPGs are seen by the law as guidance, but may be material considerations in deciding on a planning application, whereas policies in local plans should, by law, be adhered to (subject to material considerations). In this research statements of intention from all these sources are defined as policies.

### 1.5.2 A definition of sustainable urban form

In order to define 'sustainable urban form' it is first necessary to understand the concept of sustainable development, and then relate this to a specifically urban context. The most widely cited definition of sustainable development is that of the WCED (1987) (see 1.1) which describes it as development which is capable of meeting today's needs without compromising the ability of future generations to meet their needs. This definition contains concepts of inter-generational equity and social justice, as well as environmental awareness (Haughton and Hunter, 1994). It also implies that a global perspective of the environment is necessary and that cross-boundary impacts should be considered. This definition is easy to understand as a principle for future development, however determining how it can be translated into a meaningful concept to apply to urban form is extremely difficult.

Several commentators have come close to such definitions by developing characterisations of 'sustainable cities' or 'sustainable urban development' (Leff, 1990; Elkin *et al.*, 1991; World Health Organisation, 1992; Breheny, 1990). Elkin *et al.* (1991) argue that, '... sustainable urban development must aim to produce a city that is "user-friendly" and resourceful, in terms not only of its form and energy-efficiency, but also its function, as a place for living' (*op cit.* p.12). Breheny (1990) suggests that sustainable urban development requires, '...the achievement of urban development aspirations, subject to the condition that the natural and man-made stock of resources are not so depleted that the long-term future is jeopardised' (*op cit.* p.9.7). Therefore, it would seem that a sustainable urban form could be defined as one which facilitates these conditions: a form which enables a reduction in the use of non-renewable resources (such as land and fossil fuels), that is 'user-friendly' for its occupants and desirable as a place to live.

Even this definition is difficult to conceptualise - for example, it does not immediately suggest high or low densities, dispersed or centralised development or small or large settlements. Nevertheless, it can be used as a starting point to understanding and assessing the qualities which sustainable urban form might have. UK intensification policies make numerous claims to sustainability and these can be assessed throughout the research against this definition. However, because a clear definition of sustainable urban form is almost impossible to find in existing literature, a secondary aim of this research is to address this shortfall by developing such a definition appropriate to issues of urban intensification.

### 1.6 The research approach

Posing the two research questions also raises a number of critical theoretical and methodological issues. Each question requires a different approach. The first question is

concerned with policy performance. It asks whether intensification policies, if implemented, will achieve their planned outcomes. This requires a policy evaluation and an assessment of performance. However, the aims of intensification policies are manifold, and their outcomes are sometimes difficult to measure. Furthermore the contradictions inherent within policy content make evaluations even more problematic. How can these contradictions be unravelled and assessed in evaluation? The second question is concerned with whether the land use planning system can implement intensification policies successfully. It requires a study of how policies are being used within the planning system. Again, the contradictions have illustrated the wide range of problems which those attempting to implement intensification policies face, ranging from resistance from local decision-makers to attempting to reverse prevalent development trends.

In order to gain an insight into how these two research questions could be answered, a review of past approaches to policy analysis was undertaken. Debate about approaches to policy research forms a large field of policy theory, and it is not the intention to review that here in any detail (Parsons, 1995; Marsh and Rhodes, 1992; Mazmanian and Sabatier, 1986; Barrett and Fudge, 1981). But an analysis of the debate has served to clarify the position taken in this research. The review revealed that, in the past, many policy studies have been undertaken which take the form of case studies, analysed through the use of various theoretical, or conceptual, models. These models explain some part of policy performance. In most cases the research is carried out with a particular explanatory theoretical model in place from the outset (Elmore, 1978). In particular, empirical implementation studies have often been used to illustrate different sources of implementation failure, such as the effects of power, culture, information and human relations (Parsons, 1995). A review of evaluation studies also found a preference for evaluating particular individual impacts of planning policy, for example, economic consequences (Fudge, 1983; Cheshire, 1985; Evans, 1988), or the effects of one particular planning instrument, such as Derelict Land Grants or Enterprise Zones (DoE, 1994b; Martin, 1989).

However, the review of the contradictions surrounding urban intensification policies shows that the problems emanate from numerous sources simultaneously. They are not all related to the planning system itself, or to decision-making structures, but encompass elements as diverse as the property market, social trends and cultural preferences. Furthermore, the policy evaluation stage of the research requires an analysis of the impacts of intensification policies across the broadest range of consequences possible, as it is this cross-issues perspective which, as the review of contradictions showed, is missing from so much current research. Bearing these contradictions in mind, it seems that to approach the research by following any one specific conceptual model from the outset may preclude the inclusion of some important explanatory elements in the performance of intensification policies. Thus, it is crucial to choose an approach to both the evaluation and implementation studies which allows the research questions to be answered, but enables an exploration of all sources of contradictions, and

allows for any other issues to emerge during the research. It is also important that the methods can draw in elements from the theoretical debate on intensification and incorporate them in any evaluations or analyses.

The chosen approach therefore draws from writers such as Parsons (1995), Barrett and Fudge (1981) and Morgan (1986; 1993). They stress the value of an issue-centred approach, whereby an understanding of the subject (intensification policies and the planning system) and the problems (the contradictions) informs both the methodology to be used, and the theory to be drawn upon in analysing the findings. Such an approach allows the subject to guide the conceptual tools, and puts an emphasis on understanding the policies and how they are actually implemented in the real world. As Barrett and Fudge (1981) argue, to understand policy in action one has to understand the context in which the policy is implemented. Thus, an essential prerequisite to understanding what is happening is '... a pluralistic approach in the use of conceptual models or theories and in the types of studies undertaken...' (*op cit.*, p.251).

This approach informs both the evaluation and the implementation stages of the research. It is similar to that used by Healey *et al.* (1988) in analysing UK planning policy processes. They argue that an 'interactive relationship between theory and empirical research is both very fruitful as a mode of inquiry and common in social scientific work' (*op cit.*, p.262). However, they also point out that such an approach requires 'a sustained conceptual and methodological consciousness and careful management if a project or research programme is not to disintegrate into unsubstantiated generalisation or weakly systematised description.' (*op cit.*, p.262).

This warning is heeded here, and reflected in the selection of the methodologies, and the structure of the research. Methodologies which allow a detailed analysis, through case studies, and an evaluation incorporating theoretical arguments drawn from existing research and the current debate are selected for both the evaluation and implementation stages of the research. Empirical research can only be undertaken once a detailed understanding of the theory surrounding both policy substance and implementation has been gained. By adopting this approach, the structure of the research is, to a large extent, predetermined. The structure of the thesis follows the structure of the research, and is presented below.

### **1.7 Thesis structure**

The thesis is in three parts. Part One includes Chapters One to Five, These chapters set the context to the research. They provide the background and theoretical information required to investigate the research questions. Part Two contains Chapter Six. This is the empirical part of the study. Part Three (Chapters Seven, Eight and Nine) contains an analysis of the field work in the light of the theoretical and contextual information presented in Part One. A more detailed review of the content of the individual chapters is given below.

A logical start to the issue-centred approach is a comprehensive introduction to urban intensification policies and their origins. Chapter Two outlines how, over the last decade or so, pressure has arisen from global and European sources, and from the UK government, to concentrate on achieving sustainable urban forms. It highlights how these pressures, combined with changes in planning philosophy in the UK during the late 1980s and early 1990s, have meant the adoption of sustainability, and subsequently urban intensification on to the planning agenda. This chapter provides the background to the policy studies which follow by providing a clear picture of the expectations of intensification policies and the planning context in which they gained prevalence.

Chapter Three then concentrates on the selection of suitable methodologies to undertake the evaluation and implementation studies. First, the requirements of effective methodologies are discussed. These are drawn from criteria arising from the research questions and contradictions and problems presented in Chapter One, and the contextual information presented in Chapter Two. In order to understand the range of methodologies available, a review of established methodologies for evaluation and implementation studies was undertaken. After consideration of some of the difficulties presented in using the various methods, two methodologies are selected.

The evaluation method is chosen from the range of balance sheet techniques appropriate to land use planning. It is called the adapted balance sheet (ABS), and was developed by the DoE to assess planning policies in the 1990s (DoE, 1992b). It provides a framework for a structured analysis of intensification policies, including identifying their aims, performance, outcomes and impacts. It then facilitates an evaluation based on assessments of performance across the three main competing interest categories in planning: economic, quality of life and environmental. This method requires the use of case studies, and some consideration is given to their selection later in the chapter.

The methodology chosen for the implementation study is based largely on qualitative research techniques such as interviews with those implementing urban intensification policies, reviews of policy development and observations of policies in action in the case study areas. Following Barrett (1981) the findings of the evaluation study are also used as a tool in the implementation study, to help focus the research on specific areas of policy success or failure. After consideration of the demands of the methodologies, in terms of resources and time, it was decided that three case studies would be sufficient. The chosen case studies are of three London boroughs: Harrow, Camden and Bromley. The reasons for their selection are outlined in Chapter Three.

The selection and presentation of the chosen methodologies further clarifies the structure of the chapters which follow. First, the theory relating to policy substance is presented in Chapter Four. It begins with a summary of national urban intensification policies, over the last decade,

drawn from all relevant policy sources, such as PPGs, White Papers and national strategies. It uses the structure of the ABS to set out the objectives of the policies, and to list the policies themselves. Thus, the policies are categorised into those with economic, environmental, and/or quality of life objectives. The chapter then presents a critical appraisal of these policies and objectives, using current research and theory. It explores, in each case, the claims made in policies and also the possible side-effects, or unplanned consequences. From this discussion, the criteria for evaluating the impacts of policies, assessed in the case studies, can be identified. The discussion also provides the knowledge necessary to undertake the evaluation stage in the ABS.

There is then a need for a comprehensive review of the implementation structures for intensification policies. Chapter Five sets out how, in the formal policy context, the aims of national policy are planned to be incorporated into regional and local planning policies, and how these policies should be used in the development control process. A review is then presented of research which sheds light on implementation problems and issues. It concentrates on four areas of implementation. It reviews, first, evidence on whether national intensification policies are included in local development plans, and draws out reasons for their inclusion or absence. It then looks at how plans are used by planning officers in the development control process, again to illuminate potential implementation problems in the case studies. Third, it looks at how elected members use plans, and how they are likely to interpret intensification policies. Finally, some attention is given to current thinking on how the planning system could be adapted or supplemented with new 'tools', to help planners implement intensification policies. Again, this contextual information provides the knowledge required to undertake an informed assessment of the empirical findings from the case studies.

Chapter Six then presents the case studies themselves. It begins with a review of regional (South East) and London-wide policies encouraging intensification over a ten year period (the study period). Then it presents the information required to complete the ABS for each case study area. Thus, for each of the three boroughs, it summarises the policies which encourage intensification, and categorises them as having economic, quality of life, and/or environmental objectives. It then logs the planning decisions made, and establishes the trends or development patterns these led to on the ground. Then, information on the impacts, identified in Chapter Four, is collected and presented.

Following the collation of all this data, the evaluations are undertaken; these set out the policies alongside their impacts, and then rate them in terms of achieving their objectives and side-effects. For each of the case studies, the findings of the implementation studies are then presented. These concentrate on the four areas of interest presented in Chapter Five. These are whether policies have been translated into plans, how they are used by planners in development control, how they are viewed by local councillors and whether any advances can be made in the planning system to improve implementation.

Chapter Seven presents an analysis of the findings on policy substance across all three case studies, and all three interest categories. It reviews the material in reference to the contextual information presented in Chapter Four. It addresses the first research question concerning whether urban intensification policies produce a sustainable urban form. The chapter looks in detail at how well findings from the case studies match the objectives of policies, and at the range of impacts which have been identified.

Chapter Eight provides the same type of analysis, but this time of policy process. It compares the rational model of the planning system, presented in Chapter Five, with the realities of the implementation process as experienced in the case study areas. It reviews whether national and regional policies are being incorporated into local development plans, and offers explanations of these findings. It then reviews how planners use development plans and intensification policies, and their attitudes towards them. It reports on how councillors view and use such policies, and presents insights from implementation theory as to why policies were used in the ways that were observed. Then, the findings about possible advances in implementation are reviewed.

Chapter Nine presents an overall conclusion of the research, combining the findings on substance and process and commenting on the delivery of sustainable urban form. It makes suggestions about how the integration of policy substance and implementation could aid sustainable development and about the necessity to develop policies and processes capable of incorporating issues of locality. It also presents a working definition of sustainable urban form useful to the urban intensification debate and comments on how the findings of the research help to answer the research questions, and shed light on the contradictions presented in Chapter One.



# **Chapter Two: The origins of urban intensification policies**

## Chapter Two: The origins of urban intensification policies

### 2.1 Introduction

The debate about the most desirable urban forms is not new. Throughout the history of planning theory, opinion has swung between those who advocate complete dispersal and those who argue for extreme centralisation, with almost every position in between represented at some time (Breheny, 1996a). However, the reasoning has been largely in terms of public health, quality of life, reactions against poor environmental quality, and searches for modern approaches to city planning. The starting point has also often been personal visions of utopia rather than rationally derived criteria. This is in contrast to the current agenda of the search for sustainable urban forms, which is occupied with defining specific characteristics of urban systems and their future effects. As Breheny argues '... the focus of the debate is now on technical questions, rather than the less tangible focus of the historic discussions, much of the concern is to gather or challenge evidence. Opinion still matters, but the quest for evidence dominates.' (*op cit.*, p.21).

But whilst academics and visionaries have often presented extreme goals, the UK town planning system, since 1947, has to a greater or lesser extent, pursued the goal of urban containment (Hall *et al.*, 1973; Healey, 1995). This has been largely for the dual reasons of protecting the countryside and renewing urban areas, or making the best use of urban land. Although the goals of the planning system have never been formally recorded (Grant, 1992), it is clear, through the planning strategies that have emerged over time, that the objectives, at a sub-regional or city-regional scale at least, are urban containment, the protection of the countryside and the creation of self contained and balanced communities (Hall *et al.*, 1973; Healey, 1995). Healey (1995) has argued that every decade since the advent of planning has seen new planning rationales, but the overall desire for a compact urban form, a derision of sprawl and the desire to protect agricultural and other rural land has continued.

In the UK, however, the 1980s marked changes that were perhaps more distinct than shifts in planning over the previous decades (Healey, 1995; Thornley, 1993; 1996). These changes are important in the compact city debate because their consequences were the catalyst for the move towards urban intensification in the late 1980s and 1990s. Whilst there is considerable debate over the potency of the changes made during the years that Margaret Thatcher was in power (Thornley, 1993; Healey, 1993; Reade, 1987), most commentators do agree that this period marked a distinct phase in planning history. It is not the intention here to join the debate over the degree of change, or the political significance of shifts in planning practice (although it is a theme which will be revisited in Chapter Five), but it is the aim to review some of the changes that occurred in planning legislation and practice because they relate directly to the endorsement of the compact city in the late 1980s and 1990s.

A succinct and useful description of changes in the 1980s is given by Healey (1995). She argues that during this decade central government experimented with ways of redefining the regulatory planning system (see also Thornley, 1993; Brindley *et al.*, 1989). These changes are described in terms of two directions that were tested as potential advances for the planning system. The first was to simplify planning by allocating areas broadly for either development or conservation, with the rules in each type of area simplified, but centrally determined (Healey, 1989; Adam Smith Institute, 1983; Thornley, 1996). Thornley (1996) has described this change as signifying the development of a dual planning system, which characterised the authoritarian strand in Thatcher's ideology; central powers were strengthened at the expense of local government and local democracy. The second change was to introduce 'commercial criteria' within the system. This involved measures such as preparing plans in conjunction with relevant development interests, allocating liberal planning regimes in certain areas (Enterprise Zones and Simplified Planning Zones), and reducing public representation in plan-making. This change characterised the second strand of Thatcher's ideology - economic liberalism, and the belief that the market is the best means of decision-making (Thornley, 1996). In government guidance many of planning's substantive issues, such as quality of life and environmental quality, were sidelined almost out of consideration, and advice was pared down to guidance on how to provide a flow of sites for development (Healey, 1995). However, according to Healey, through all these changes '... the substantive notion of the compact city lived on' (*op cit.*, p.262).

Whilst the 'notion' may still have been in place, it was implemented largely through the mechanism of green belt policy (Healey, 1995). Although green belts were effective where they were in place (DoE, 1993a), in the UK as a whole they were not comprehensive enough to contain the development which the other changes noted above were facilitating. In particular, the inclusion of development interests in plan-making, sympathy for the market at planning appeals, the commitment to providing a ready supply of housing land, and the simplification of development controls - combined with the development boom - led to uneven development patterns which led to massive changes in the UK's urban landscape.

A major trend was the development of peripheral and greenfield sites which were cheaper and easier to develop than brownfield sites. But there was also an increase in infill development in towns and cities in the more prosperous and desirable parts of the UK. Most of the development on greenfield sites was by volume housebuilders and retail and leisure companies, and this led some to describe the 1980s as the decade of the 'out-of-town revolution' (McKie, 1996). But for those in desirable locations it was known as the period when many claim 'town cramming' became a recognised phenomenon (Williams *et al.*, 1996; Crookston *et al.*, 1996). There was also mounting pressure from consortia of volume housebuilders to develop new settlements, and these were often proposed in environmentally protected areas (Thornley, 1996).

Whilst the planning system was concerning itself with the supply of land, patterns of demand appeared to be continuing from the previous decade. As stated in Chapter One, in the early - mid 1980s the demand for suburban housing was sustained and the trend of out-migration from the UK's larger towns and cities, for work and living, continued (Champion *et al.*, 1993). Thus, counter-urbanisation dominated, with the non-metropolitan areas gaining the most, and the most urbanised areas suffering the greatest losses (CPRE, 1996). However, by the very end of the 1980s, there were signs that out-migration might be slowing, and some commentators identified a drift back to cities. In particular, there were signs that the largest towns and cities may have been in the early stages of re-urbanising (Lever, 1993; Fielding and Halford, 1990).

During the latter half of the 1980s, however, the impacts of the out-migration trends began to become apparent. In particular, the effects of suburbanisation and out-of town facilities were recognised as undesirable as they led to increased trip lengths (Light, 1992; CPRE, 1992). The quality of new suburban development was also criticised. Glancey summarises the general disquiet when he argues that, 'In the Eighties, suburbia lost its innocence and ate greedily into the countryside. Thatcher's England was smothered in formless new executive culs-de-sac...' (1994, p.9). Another attack came from less prosperous towns and cities where out-of-town developments were seen as the cause of the degeneration of existing town centres. It was argued that the decline of local shops and high streets had severe implications in terms of local economies and social equity, as only those with cars had access to out-of-town facilities (Hillman, 1996; Sherlock, 1991; 1996). Conversely, residents of intensified areas often lodged protests about over-development and loss of amenity and urban open space. In the South and South East in particular, where housing densities increased, and many counties began to resist development on the grounds that they had reached capacity, pressure was mounting and conflict was heightened. The proposals for new settlements were also causing alarm in the shire counties and opposing groups of traditionally conservative supporters - land owners and residents of more prosperous areas keen to protect their heritage - came into conflict (Thornley, 1996).

However, as Healey notes, in terms of planning 'This period came to an abrupt end around 1990' (1995, p.262). She identifies two major changes. The first was in the planning environment. The extent to which this was a result of a change of leadership is debated (Thornley, 1993; Letwin, 1992), but there was a shift away from the volatile planning context of the 1980s, with its project-based approach to land use regulation. The experiment of simplifying planning had failed because political reality showed that balancing development was complex, and most people cared about their local areas and wanted consideration for development everywhere, not just in a few special zones; i.e. the importance of locality had been underestimated (Bagguley *et al.*, 1990). The project-based approach was recognised as damaging in terms of financial and political costs as it heightened chances of conflict and was inefficient in mediating that conflict (Thornley, 1993).

One of the main outcomes of this change, in terms of policy, was that in 1991 the Planning and Compensation Act renewed the importance of the development plan. This was seen as marking a new era in planning (Thornley, 1996; Edwards and McCafferty, 1992). Section 54A of the Act stated that any planning decisions should be taken 'in accordance with the plan unless other material considerations indicate otherwise'. In 1992, the DoE also included, in PPG12, the requirement that plans should consider environmental sustainability (DoE, 1992d). Whilst there is disagreement over the extent to which these changes empower local authorities to make decisions on sustainability (Edwards and Martin, 1991), they are important for the notion of the compact city. Local plans must now contain intentions on sustainable development by the local authority, but they must also still incorporate strategic and regional guidance. Central government thus still has considerable power over the content of the plans, and guides their implementation by exerting influence through PPGs. Currently central sources all favour urban intensification.

The second change was the adoption of the environmental agenda at global and local scales. Issues of sustainability were forced onto the political agenda by global pressure for change. The importance of this development cannot be underestimated. Even though the government's response has been slow in many areas, in planning policy a distinct shift can be identified which has given planners a new purpose. However, it has also presented the challenge of deciding what sustainability means in practical terms and, in particular, what it means for the future of urban form. Healey and Shaw recognised this challenge when they stated that, 'The concept of sustainable development in effect offers a new approach to planning: the challenge of integrating and relating one to another the economic, social and physical dimensions of human existence ... But operationalizing the concept is no simple task.' (1993, p.772).

It is important here to examine how these shifts, the changing planning environment and the new environmental agenda, have combined to embrace sustainability into planning policy from the global level, through European policy to national and local legislation, and how these changes have meant that urban intensification is now being supported. A brief review of this process sets the formal policy context.

### **2.2 Global commitments to sustainable cities**

The report, *Our Common Future*, was published by the World Commission on Environment and Development in 1987, and it contained the now familiar 'Brundtland' definition of sustainable development. Since its publication, those involved in the urban environment have been seeking to define the implications of this concept for urban planning. The United Nations Conference on Environment and Development (UNCED) in Rio de Janeiro in 1992, increased awareness of sustainability and established some common ground for those trying to develop policies. The conference also produced the 'Rio Declaration', which was a set of principles relating to the attainment of sustainability. To support the Declaration, Agenda 21 was adopted. This was a plan for action on sustainable development, aimed at national and local

governments and non-governmental organisations. It was important because it devolved responsibility for sustainability strategies to the local level. Thus, in the UK, local authorities, including planning departments, became directly involved. At the conference a new agency was also established - the United Nations' Commission on Sustainable Development - to which national governments were required to report annually on their progress towards sustainability. Thus there was pressure on the UK government to think through its position, including its policies on the location of future development.

### 2.3 The European vision of sustainable urban form

In Europe the response to the Brundtland report was to start looking at issues of urban sustainability. Six international conferences were held on different urban issues and the outcome of them was a recognition that urban problems need to be tackled together, not on an issue-by-issue basis. Hence, the prescriptions that came out of these conferences took the city as a project in its own right (Welbank, 1996). The result was an influential document strongly in favour of the compact city. The *Green Paper on the Urban Environment* (CEC, 1990) was published as a discussion document, but was far from neutral in its content. It advocated a clearly defined picture of how urban areas ought to develop, stressing high density, mixed-uses, and a return to the cultural vibrancy associated with many historic European towns, arguing that what was at stake was no less than the 'quality of "civilisation" in its most practical manifestations of economic, scientific and social performance' (*op cit.*, p.19). A basis for the Commission's vision was that '...the past decades have seen a rediscovery of the value of urban living and a growing appreciation of the importance of the quality of life in the cities of Europe' (*op cit.*, p.19): an appreciation that, as noted above, may not be universally shared in the UK.

Although the *Green Paper* is unsubstantiated by empirical inquiry, its emotive message has struck a chord with those witnessing the decline of many inner-urban areas across Europe. The Commission's strongest argument rests on the social and cultural role of cities. It sees compact urban living as a prerequisite for civilised society and argues that '...the city's cultural role depends on density, proximity and choice. These factors facilitate the "production" of culture as much as its "consumption".' (1990, p.21). If these favourable conditions can be recreated then people will choose to live in the cities, and thus urban areas will be revitalised, and demand for housing within the suburbs and on greenfield sites reduced.

Much of the Commission's appreciation of the compact city, however, derives from a rejection of its opposite: mono-functional (as it sees it) suburbia. The commission argues that:

The enemies of this source of (urban) creativity are, on the one hand, undifferentiated suburban sprawl in quasi-rural settings which isolate the individual; and highly specialized land-use policies within cities which create functional enclaves and social ghettos where like speaks to like ... (CEC, 1990, p.21).

Whilst the *Green Paper* does not have any real power in that it is not embodied in legislation, it has had considerable impact on the debate surrounding the future form of urban development (Welbank, 1996). It has had the effect of focusing attention on the compact, mixed-use city as the model to be supported or opposed. It also strongly reinstated the role of urban management strategies. As Hall *et al.* state: '... whatever the argument for the sustainability of different urban forms, the importance of the Community's intervention is that it has re-established the old nexus between town planning and sustainable development issues.' (1993, p.23)

### 2.4 The UK's position on sustainable urban form

In the UK the government endorsed sustainability in the environment White Paper *This Common Inheritance* (HM Govt, 1990). This was a key document for those dealing with urban form and sustainability as it established the environment as a strategic planning issue. Then, in 1994, the government launched its response to the UNCED by producing four documents, including the report *Sustainable Development: the UK Strategy* (HM Govt., 1994), which for the first time specifically dealt with urban land use issues. Although the document has been criticised by some as being more a 'wish list' than a strategy (Welbank, 1996) it does set out specific aims for future urban development, including the case that compact, higher density urban areas may be more sustainable. The emphasis is on making existing urban areas more attractive and reducing travel. Its ideas are less emotive than the CEC's: it talks in terms of 'attractive and convenient urban areas', 'restoring derelict and contaminated land' and 'development in locations which minimise energy consumption' (HM Govt, 1994, p.158). But its reasoning borrows from the CEC. It states:

Urban growth should be encouraged in the most sustainable settlement form. The density of towns is important. More compact urban development uses less land. It also enables lower energy consumption through efficient generation technologies such as district heating and through the reduced need to travel, for example, from homes to schools, to shops, and to work. Larger towns can more readily develop the critical mass that enables them to offer a variety of facilities locally, thus reducing the need to travel to other towns for work, shopping or leisure (*op cit.*, p.161).

Since the early 1990s the discussion has moved on quickly, and there has been considerable breadth and depth of research and investigation. The UK government has also moved forward by commissioning a number of influential pieces of research (ECOTEC, 1993; DoE, 1993b; Breheny *et al.*, 1996; DETR, forthcoming) and revising a number of key planning documents to bring sustainability and, in turn, urban intensification into the realms of planning policy (see Chapter Four). As stated in Chapter One, the most significant changes for planning have come in the form of revised planning policy guidance notes. Of these, the revision of *PPG13: Transport* (DoE and DoT, 1994) is probably the most important, but the introduction of sequential testing in *PPG6: Town Centres and Retail Development* (DoE, 1993c), the reinforcement of the need to use brownfield sites in *PPG3: Housing* (DoE, 1992a) and the incorporation of the sustainability agenda into *PPG1: General Policy and Principles* (DoE,

1992e; 1997) and *PPG12: Development Plans and Regional Guidance* (DoE, 1992d), are also significant.

The publication of the household projections (DoE, 1995c) has meant that the debate about urban intensification, and other settlement options has now become focused around very real choices about the most sustainable locations for new homes (Lock, 1994; Breheny and Hall, 1996). The UK Round Table on Sustainable Development recently looked into the issue of the potential of urban areas to accommodate the projected households (UK Round Table on Sustainable Development, 1997). It proposed the introduction of Urban White Papers for England aiming to build three-quarters of all new housing on previously developed land, and the introduction of a sequential test for housing, similar to that currently applied to major retail development. The Round Table's suggestions are now the subject of considerable debate which looks set to continue for some time.

### 2.5 Conclusion

From the origins presented above, a new movement towards the compact city has emerged in the UK. It is largely a response to the drive towards sustainability, but is also a reaction to the uneven development patterns witnessed in the 1980s. *From this position local authorities are expected to interpret the policy advice to deliver sustainable towns and cities. However, as explained in Chapter One, some serious questioning of the acceptability and feasibility of the compact city as a sustainable urban form is being voiced, and the problems inherent in trying to implement the concept in the UK are becoming more apparent as local authorities attempt to implement central government guidance. The next stage of the research is to consolidate this background information with the research questions stated in Chapter One, to develop a systematic way of investigating these issues.*



# **Chapter Three: Assessing urban intensification policies and processes: effective methodologies**

## Chapter Three: Assessing urban intensification policies and processes: effective methodologies

### 3.1 Introduction

In order to answer the two research questions presented in Chapter One, the need for a methodology which consisted of a policy evaluation and an implementation study was recognised. A research approach to the study was devised which aimed to keep to the principle of studying urban intensification policies in context, using a structured methodology, and at the same time being aware of various theoretical concepts which might be of use in evaluating the findings. By considering these principles, and the research questions, it is possible to establish a set of criteria which an effective methodology should meet. This chapter presents the methodologies involved in first, the evaluation stage, and second, the implementation stage.

### 3.2 The evaluation methodology

#### 3.2.1 The requirements of an evaluation methodology

Most policy evaluation studies suggest that a starting point for research should be a clear statement of policy objectives. The research method should identify the variety of sources of policy within the planning system, and elicit specific objectives from them. As stated in the previous chapters, intensification policies are incorporated in a number of different documents produced by central government, including PPGs, White Papers and national strategies. They are also, however, contained in regional policy documents and local level development plans. Policy objectives should be extracted from all of these sources as a first step in enabling a subsequent evaluation of policy success or failure.

The method should also be able to highlight the inter-relationships which exist between the different scales of planning, and reveal whether the planning system balances local and strategic interests. As stated earlier, one of the main contradictions of intensification policies appears to be the conflict between strategic objectives which are borne out at the local level. The method should also be able to consider changes over time, as planning's effects are often determined in the medium to long term. On a more practical level, the method should also be achievable in terms of data requirements, time and scope. It is also vitally important that it is readily understandable and that its results are in a useful form.

Most importantly though, the method should reveal the performance of planning in implementing compact city policies and balancing the multi-faceted objectives encompassed by the concept of the sustainable compact city (see DoE, 1992b). The method should allow the actual achievements of planning, in terms of number, type and location of development to be presented. It should also allow the impacts, or side-effects, of policies to be determined, and included as a component of evaluation. Any final evaluation should be based upon a systematic assessment of the advantages and disadvantages of urban intensification, including the impacts, from the evidence in the case

studies, but also in relation to the issues raised in theory (and presented in detail in Chapter Four). As seen above, the origins of many of the criticisms of intensification policies in urban theory indicate that the evaluation should be able to relate the theory presented to any empirical research.

### 3.2.2 A review of evaluation methodologies

In order to develop a methodology capable of meeting these requirements, a review of evaluation methods was undertaken. Although the process of evaluation has not specifically been related to the process of intensification before, evaluating the effectiveness of planning in other areas has long been an essential part of policy review and formation. Furthermore, changes in planning in the 1990s have meant that there has been a renewed interest in assessing policy impacts, which has led to an emphasis on attempts at qualitative assessments of planning functions rather than on quantitative targets (DoE, 1992b). However, whilst the need for qualitative assessments of effectiveness has been acknowledged, guidance on how to undertake such assessments has been scarce (DoE, 1992b; Pearce, 1992).

Investigating the impacts of any given set of planning policies is necessarily a complex problem (Reade, 1982) and consequently, assessments of planning are limited (Pearce, 1992). Pearce notes that there are difficulties inherent in determining policy aims, because they are often loosely stated, or implied, or contradictory, and identifying policies themselves is not easy because a number of sources are relevant to any particular planning issue. Then, identifying the outcomes is problematic because it is impossible to compare what has happened in an area subject to planning regulations with an identical, but planning-free, environment elsewhere: it is impossible to use a 'control'. Furthermore, the practical issue of the lack of monitoring data is a constraint (Pearce, 1992). Reade (1982) questions the ability to define planning's objectives at all because planners themselves fail to clarify their purposes, and therefore he sees evaluation and analysis as almost impossible (see Chapter Five). Hogwood and Gunn (1984) list problems in measuring and evaluating the side-effects of policies, in assessing impacts when there are time-lags between implementation and outcome and in defining criteria for policy success. The DoE acknowledges that some of these complexities might have led to a lack of attempts to evaluate planning when it sums up, in a report into planning evaluation methods, that:

The function of planning as a means of balancing and arbitrating between competing interests is a theme which underlies most of the literature concerned with evaluation in planning. Most authors highlight the multiplicity of objectives underlying planning, although attempts to undertake a comprehensive assessment of effectiveness in planning are notably absent. (DoE, 1992b, p.6)

Faced with these difficulties it would be easy to conclude that evaluation is likely to be so methodologically complicated or flawed that its undertaking is not worthwhile. However, in the case of initiatives aimed at improving sustainability, it is crucial that evaluations are undertaken because, as stated in Chapter One, policies are being implemented with very little knowledge about their outcomes. It is from this position - an understanding of the complexities, but an

appreciation of the importance of the task - that a decision on a method suitable for this research was made.

A number of approaches to planning evaluation have been developed. As stated in Chapter One, in the 1980s and 1990s types of research were devised to evaluate particular aspects of the planning environment (Fudge, 1983; Cheshire, 1985; Evans, 1988), or the effectiveness of particular policy instruments such as Derelict Land Grants, or Enterprise Zones (DoE, 1994b; Martin, 1989). In the 1990s there have also been advances and new techniques and methods devised to assess urban intensification (DETR, forthcoming), and to measure development capacities (Llewelyn Davies, 1994; Arup Economics and Planning *et al.*, 1995). However, none of these studies have been in the form of a policy analysis.

Therefore a review of policy evaluation techniques was undertaken. First a range of 'before and after' studies was investigated. These simply record the state of affairs before a policy has been implemented and then compare it with the situation after. Although the concept of this type of study is appealing in its simplicity, the methods themselves are not sophisticated enough to deal with the numerous policy objectives of intensification. They do not suggest how to deal with multiple objectives or side effects, for example. Second, modelling techniques were reviewed. These require methods traditionally used for policy forecasting to be focused on the past. The 'theoretical' policy impacts can then be predicted and compared with actual outcomes. Although these techniques have been applied to British regional policy (Ashcroft, 1978) they are perhaps better suited to policies where the relationship between implementation and outcome is straightforward. They are also inadequate at handling missing data or uncertainties (Hogwood and Gunn, 1984). Finally, retrospective balance sheet analyses were reviewed. Cost-benefit analyses<sup>1</sup> are usually used to decide whether a policy should be implemented or not, but balance sheet approaches have also been devised to evaluate policies post-implementation.

The review pointed to the balance sheet approaches being more appropriate to this research than the others. They are more holistic than the other methods in that they attempt to match policies with outcomes across a broad spectrum of interests. In particular, they are attractive as they offer the broad-based and open methodology required to investigate the multiplicity of aims and processes involved in urban intensification. Thus, a more detailed investigation of the balance sheet's history was undertaken to see if it had a form appropriate for this research (Williams, 1993).

The Planning Balance Sheet was conceived and developed between the 1950s and 1970s by Nathaniel Lichfield, but his 1975 work can be seen as the culmination of his endeavours. It was a social cost benefit analysis (SCBA) which identified the groups that fared better, and those which suffered, given a certain policy. However, Lichfield developed a specific framework within which the SCBA could be more effectively applied, and it was this which constituted a balance sheet

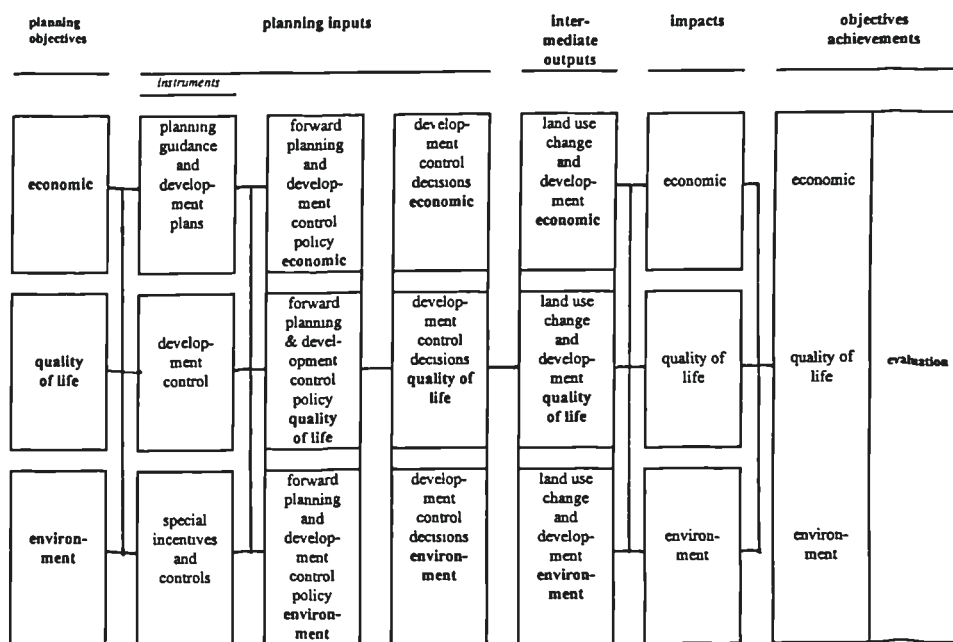
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<sup>1</sup>See Hogwood and Gunn (1984) pp.233-234 for a review of retrospective cost-benefit analysis.

(Lichfield *et al.*, 1975). The balance sheet approach provided the possibility of addressing the multi-sectoral nature of land use planning and of accepting that there are a number of intangible, and incommensurable factors which need to be considered by decision makers, but that do not get included in traditional SCBAs. It also allowed information of different types to be included in the same evaluation, for example quantitative data, and qualitative descriptions.

In 1992 the DoE published an updated balance sheet, called the Adapted Balance Sheet (ABS) (DoE, 1992b), which aimed to be more appropriate to the current planning system. It owes much to Lichfield's original model but also incorporates solutions to problems faced in using existing balance sheet techniques. The ABS is simply a structure through which to explore the relationships between different scales of planning policy and different levels of impacts in a systematic way and over time, without allowing the deliberate omission of any impact. Fig. 3.1 shows the structure of the ABS. It does not offer any answers in itself, but provides a structure through which to catalogue the interrelated aims, outcomes and effects of planning policies. In so doing, it lays bare the evaluation process. However, as with all evaluation methods it is reliant on accurate qualitative and quantitative information and informed research and evaluation.

Fig. 3.1 The adapted balance sheet



On closer inspection the ABS appeared to meet almost all of the criteria set out in 3.2.1. It begins with requiring a definition of the objectives of policies, and thus the identification of planning instruments at all scales of planning. It then provides a means of presenting the performance of planning in terms of actual decisions and the development patterns or trends in which these result. It then requires the identification of the impacts of intensification. Finally, and importantly, it allows the theoretical debate to be drawn in to inform the final evaluation. For these reasons the ABS was chosen as the evaluation method for this research.

This is not to say that the ABS is without its limitations. As Hogwood and Gunn (1984) state, 'By its nature it (*the balance sheet*) cannot provide an unambiguous assessment and leaves scope for disagreement about overall success or failure, but at least it provides a more formal basis for "political evaluation"!' (*op cit.*, p.234). This possibility of bias in data collection and evaluation should be recognised. The ABS should also be used sensitively to make explicit whose interest it is representing. What may be seen as a positive outcome of planning by one party may be seen as wholly detrimental by another. The balance sheet itself does not make these biases clear, so it is the researcher who is responsible for defining them. The researcher also makes the final evaluations on policy success or failure based on the data presented in the ABS, and again this source of bias should be recognised (see 3.2.3.5). This said, the ABS seemed the most useful method of all those reviewed.

In order to clarify how it can be used to examine urban intensification policies, a brief description of the sections of the ABS is presented below<sup>2</sup>, along with descriptions of how the information in each section will be collected in the research.

### 3.2.3 The adapted balance sheet

The aim of the ABS is to set out information about planning's objectives and achievements. This is done by splitting the balance sheet into two sections: performance monitoring and strategic evaluation. Performance monitoring establishes the performance of planning against predetermined targets (objectives, as set out in policies). These performances, once defined, can be evaluated (see below). The ABS contains the following elements:

**3.2.3.1 The objectives of planning** - The ABS classifies objectives, drawn from policies, in terms of three major interest categories within planning; economic, quality of life and environmental. This categorisation is in some ways problematic, for example because policies often have more than one objective, but it does represent the major trade-offs which have to be made in almost all planning decisions. These categories are used throughout the balance sheet and help order the evaluation. To complete this section of the ABS the objectives of urban intensification policies need to be identified at all scales of planning; national, regional, and local. This requires a review of all planning policy documents relevant to the case study areas, to identify the objectives associated with intensification policies. By identifying these objectives explicitly it is possible to establish the consistency of the aims, as well as any contradictions which there may be between them.

**3.2.3.2 Inputs** - The next section requires a listing of the inputs into the planning system which have a bearing on intensification policies. Primarily, this means identifying all the plans and policy documents relevant to each case study area (this will have already been done, in practice, to elicit

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<sup>2</sup>Section 3.2.3 briefly outlines the context and structure of the ABS, and is therefore largely a summary of *Evaluating the Effectiveness of Land Use Planning* (DoE, 1992b).

the objectives). In this section any special incentives or controls which are to be used to implement urban intensification policies are identified. Such instruments could, for example, be financial measures, such as the Single Regeneration Budget, or City Challenge. Once these inputs have been identified, the policies themselves are listed. These are elicited from the documents identified at all levels of planning, and are closely related to the objectives outlined in the first section. In fact, the objectives and policies are often difficult to separate from one another. As with the objectives, the policies are derived from a detailed review of all policy documents, at all levels of planning relevant to each case study area, and are categorised as those with economic, quality of life and environmental objectives. There are other inputs which affect the planning system but lie outside it, such as land supply, demand for particular uses, cultural changes or preferences. Although these are not listed in the ABS there is room for them to be drawn into the evaluation if they come to light during the research, from interviews or the review of literature.

The ABS then requires information to be collected on all planning decisions which relate to urban intensification policies over the time span of the research (see 3.4 below). These figures represent the actual developments which have taken place and should be recorded, if possible, in terms of scale, location, and to which interest category they are related. For example, it is important to know whether developments are housing, which contribute mainly to quality of life objectives, or offices, which are more likely to be associated with economic policies and objectives.

**3.2.3.3 Intermediate outputs** - Having defined the planning decisions that have been made, there is a need to identify the trends, or patterns, these have formed in development on the ground. This requires undertaking a review of land use changes and developments that have occurred in the case study areas. This analysis can be summarised into measured patterns of development, for example on derelict land, on urban green space, or on out-of-town sites. This will then show how individual development decisions have been translated into changes in urban development. This is an important part of assessing the success of policies aimed at achieving intensification.

**3.2.3.4 Impacts** - Once the patterns of development in the case study areas have been determined, it is then important to assess the consequences of these developments in terms of impacts, or costs and benefits. The range of possible impacts is identified through an in-depth review of literature relating to intensification in Chapter Four. The impacts under the three categories of economic, quality of life and environment are assessed in the case studies. It is important that, along with a measurement of the intended outcomes of the policies, there is a presentation of the unintended consequences. Ideally, for each impact category, there should be a number of 'indicators' which can be measured, or investigated qualitatively.

It is important to establish here who the impacts are seen to be affecting. For the most part policies aim to minimise disbenefits for the 'public good.' Although this is a difficult concept to define due to the diversity of modern society (Healey, 1997; Evans, 1994) it has a general understanding within planning. Thus, most of the impacts are measured in terms of their impacts on 'the public' -

the consumers of the outcomes of planning. However, the literature and policy reviews (Chapter Four) also indicate that there are some significant claims about impacts on other interests, such as local authorities and local business communities. Where these claims are explicit in policy or in literature they are also examined.

**3.2.3.5 Evaluation** - The evaluation uses all the information laid out in the balance sheet to allow a systematic and as objective as possible account of achievement in terms of meeting and balancing objectives. It takes place at two levels. Firstly, there is a relatively simple systematic assessment of objectives achievement. A method is used for this which sets out the objectives of policies in each interest category and offers a rating of high medium or low achievement. This rating is based on whether the objective has been met, and what its impacts have been. This allows comparison of the policy areas which have been more, and less, successful in achieving what was intended. Then, based upon this assessment, the achievements are considered across the interest categories, and the scales of planning. This assessment allows for the broader aims of policy to be brought into the discussion, and is dependant on an understanding of the arguments surrounding the costs and benefits of urban intensification. Only by understanding the wider theoretical arguments can an informed evaluation be given of the empirical research.

This overall approach should prove useful because the range of data sources will allow the interpretation of the findings to be critically cross-checked (see also Healey *et al.*, 1988). As the evaluation is undertaken by the researcher it will never be entirely objective, but at least if the information is clearly set out, and the theoretical arguments considered, then an informed analysis can be undertaken. Furthermore, the balance sheet allows other analysts to review the 'evidence' and perhaps re-interpret the evaluation.

### **3.2.4 Data requirements**

Some basic principles needed to be established for deciding on the information to be included in the ABS. The DoE (1992b) suggests that hard data should be used, where it exists. If there are any gaps in the data, then qualitative information can be used. This could take the form of information from interviews with planning professionals, who may have a good knowledge of land development patterns in any given area. In order to gain information on development patterns and the wide range of impacts, a number of sources of data is needed, including local authority reports and ad-hoc statistics on various issues, such as travel patterns, local economies and so on. Finally, in terms of the evaluation, as stated above, all of the information presented in the balance sheet needs to be considered in the light of information gleaned from an in-depth review of literature surrounding urban intensification.

## **3.3 Implementation Study**

### **3.3.1 The requirements of an implementation study methodology**

Chapter One highlighted a number of constraints on the successful implementation of intensification policies. It suggested there were problems in making intensification happen,



especially in areas not profitable to developers, and that planning authorities had difficulty, where intensification was happening, in ensuring its benefits and minimising its negative impacts. Therefore a method of investigation is needed which allows an exploration of these issues, but is open to the inclusion of any other factors which may be relevant. Again, the starting point for the selection of a method was a review of existing attempts at undertaking implementation studies in planning.

There have been relatively few systematic studies of planning policy implementation. However, those which have been undertaken have been very useful in providing insights into the types of methodological issues which are important in the study of land use planning (Underwood, 1981; Pratt and Larkham, 1996; Whitehand, 1989). A review of these studies is presented in Chapter Five. Predominantly, the research methods used in the past have been largely qualitative, such as in-depth interviews with those implementing certain policies, and observations of policy use and development. The information has been collected in as 'open' a way as possible, so as not to lead the research, although some have commented that a completely unbiased methodology is almost impossible to achieve (Maynard and Purvis, 1994; Barrett and Fudge, 1981). Then, once the information has been collected, it has been analysed using insights from various aspects of implementation theory. However, the review of previous studies highlighted, again, the need to have a good understanding of the implementation environment or context, and the means by which policies are supposed to be implemented, according to formal planning procedures.

### 3.3.2 The chosen implementation study methodology

The above principles seemed to suggest that the best way of achieving a relatively open approach and an understanding of policies in action in this research was to undertake in-depth, semi-structured interviews with those implementing intensification policies, but to attempt not to lead the interviews in any way by suggesting possible constraints to implementation. It was important to be aware of, and avoid, sources of bias during the interviews (May, 1997; Silverman, 1997). It was decided that those interviewed should include both planners involved in plan-making and policy development, and also those involved directly with implementation, in development control sections of the case study authorities. The other key group involved in implementation are the local councillors who sit on planning committees, so they were also included as interviewees in the case studies. Interview schedules were devised for these two groups which consisted of thematic questions which allowed the interviewees to be probed on issues needing clarification. In this way the interviews could be easily compared, but also provided a wealth of detailed information (Dey, 1993; Kvale, 1996). The schedules and responses are recorded in Appendix A.

Following Barrett and Fudge (1981) it was also seen as useful to observe how urban intensification policies had been developed or altered over time by those involved in implementation, as this might give an indication of implementation issues. Therefore a review of policy development at the local level, throughout the case study periods, was also undertaken.

Finally, it seemed important to cross check the findings from the evaluation study with those implementing policies in each case study area, so they could shed light, from an implementation perspective, on any specific policy successes or failures which had been identified, or indeed comment on the accuracy of the findings from the evaluation studies. In this way the evaluation study could be used as a tool in the implementation study. This part of the research was undertaken informally in the interviews, after the initial 'open' questioning had been completed.

### 3.4 Time scale

Consideration was given to the time scale of the research. The review of policies in Chapter Two indicated that urban intensification policies had been in place since the beginning of modern town planning, but that the late 1980s and 1990s had seen a re-emphasis on these policies as a means of achieving sustainable development. As it is the relationship between urban intensification and sustainability that is the subject of this research, it seemed sensible to consider policies which have been developed since the late 1980s. The report which presents the ABS suggests that a ten year time scale is appropriate for a planning policy evaluation, although it argues that assessing policy over a longer period may give more accurate results (DoE, 1992b). Thus this research will include policies developed from 1987 onwards that relate to intensification. However, because the subject of evaluation is a 'policy field' and not a single policy, different individual policies have been introduced throughout the time scale of the research. Fortunately, the flexible nature of the ABS allows an inclusion of all policies, and the evaluation can take into consideration their respective 'life-spans'.

### 3.5 Case study selection

As explained in Chapter One, the ABS and implementation studies were undertaken in several case study areas. Therefore, some decisions had to be made about the scale, number and type of area chosen. First, in terms of scale, it seemed that the borough, or district, level was appropriate. This level is the final administrative tier in a policy system which sees national policies translated to the regional and local level. It is also the level at which policies are turned into development on the ground, through the development control system. Therefore, it is the level at which the effects of intensification can be measured (although a strategic evaluation of the local impacts is also part of the ABS). Most local monitoring is also done at the borough level and this facilitates data collection.

Second, in terms of the number of case studies required, it seemed that, in order to achieve the depth of analysis required within the given time and resource constraints, three case studies were likely to be the maximum that could be managed. This small number means that care needed to be taken in drawing general conclusions and inferring broader trends (Rose, 1991). However, it is sufficient to provide a very detailed look at policy performance and implementation issues in the chosen areas, and it does allow comparisons across the three case studies. This level of analysis seems to be important, bearing in mind the paucity of detailed local evaluations of either the consequences or processes of intensification policies.

Third is the question of the type of borough to be chosen. In considering the aims of the research, several criteria for selection were apparent. The most important was that the chosen boroughs should have undergone intensification of some type. Second, boroughs which had experienced a variety of types of intensification were required, as this facilitates an assessment of a range of outcomes, and might shed light on the varied impacts of different types of intensification. It was also decided that authorities with different policy approaches to intensification should be selected, to enable an assessment of the differences such variations made.

In order to meet these criteria, the findings of research into urban intensification in the UK were reviewed (DETR, forthcoming). This research indicated that most intensification had occurred in the South East of England, especially in the inner and outer London boroughs. It was therefore decided to select case studies from the London area. Although, in some ways, London is an exceptional case in the UK, its individual boroughs have the same pressures as in many other local authorities. Using London boroughs only also meant that regional policies were the same for all three case studies, and only local policies varied. This allowed a detailed analysis of the ways in which national policy was interpreted at the local level, and of the differences which this made to development patterns. The final stage, therefore, was to decide which boroughs to study. After undertaking research into a number of possible areas, Harrow, Bromley and Camden were chosen. They were seen as appropriate cases for the following reasons.

### 3.5.1 Harrow

Harrow experienced development pressures typical of an outer London borough throughout the 1980s and early 1990s. In particular, it saw a rapid increase in backland development, infill and conversions in its suburbs, and continued pressure on its centre. Therefore, although, as already stated, general conclusions will not be drawn from three case studies, it seems that Harrow is not a particularly unusual example of an outer London borough. In terms of policy approaches, Harrow had specifically addressed the problem of residential intensification in its local plans. Throughout the 1980s, continued local pressure forced the local authority to consider action against intensification in some areas but to promote it in others. Local opinions have been well documented, as have the local authority's actions. This information is useful in tracing opinions back over time. Harrow's data is more useful than that of other boroughs as it was collected with the specific aim of addressing the issue of urban intensification. From the initial contact, the planners at Harrow were enthusiastic about the research and willing to participate in it.

### 3.5.2 Camden

Camden is an inner London borough, and is markedly different in character from Harrow. Over the past decade it has witnessed intensification of built form and, significantly, large increases both in the numbers of people working in the borough, and visiting it as tourists. The borough itself has a mixture of land uses, and is sharply divided between some very affluent areas such as Hampstead and Bloomsbury, and neighbourhoods characterised by large proportions of social housing, high unemployment and overcrowding. The borough's policy approach to urban intensification had

been comprehensive, attempting to implement most of the policies set out in national guidance. In particular it has tried to raise residential densities and reduce the need to travel by car. Planners and councillors in Camden were also willing to participate in the study. Thus Camden is a good borough in which to explore some of the contentions about increases in population and residential densities, and their knock-on effects.

### 3.5.3 Bromley

Bromley is also an outer London borough, but its circumstances are quite different from those in Harrow. It experienced intensification over the last decade; this took the form, mainly, of redevelopment of existing buildings at higher densities. However, in policy terms it had a more protectionist stance, especially where the protection of open and amenity land is concerned. The local development plans were environmentally driven and change was strongly resisted. Planners, more recently, had addressed the relationship between intensification and sustainability and are currently attempting to incorporate some radical policies into the UDP revisions. Thus Bromley offers an interesting insight into intensification policy development and implementation in a highly protectionist policy environment. Again, the borough's monitoring is adequate for the study and the planners and local councillors were keen to participate.

### 3.6 Conclusion

This chapter has presented the methodologies chosen for use in the case studies. By applying them at the local level, it is hoped that the research questions posed in Chapter One can be answered. However, the research approach presented in Chapter One, with its emphasis on evaluation in context, and the methodologies outlined here, highlight the need for a full understanding of current arguments surrounding the substance and processes of urban intensification policies.

In terms of policy content it is important to understand the theory behind intensification policies. It is necessary to examine the claims of policies and their impacts in order to be able to undertake the evaluation section of the ABS. In terms of process too, there needs to be a full understanding of how the planning system should implement intensification policies, so that when issues of implementation arise in the case studies, they can be viewed within an overall theoretical framework. The next two chapters provide this theoretical background. Chapter Four presents theory surrounding policy substance, and Chapter Five addresses policy processes. These chapters provide the reference points for the analyses of the case study findings.

# **Chapter Four: Urban intensification policies: content and objectives**

## Chapter Four: Urban intensification policies: content and objectives

### 4.1 Introduction

In order to undertake an evaluation of urban intensification policies, it is crucial to have an understanding of both the stated objectives of the policies and of any possible unintended impacts, which could be either costs or benefits. The complex nature of urban intensification means that most objectives of intensification policies can be questioned in terms of their contribution to sustainability. As stated in Chapter One, many of the claims about the benefits of intensification are questionable and unsubstantiated by research.

A starting point for this understanding is the identification of all policies encouraging intensification and their objectives at the national level. These have been collated from an examination of all Planning Policy Guidance Notes, and other documents which have prescribed land use policy in the UK since 1987. All planning policies which promote urban intensification are presented in Tables 4.1, 4.2 and 4.3. The tables summarise the policies which have been in place and their explicit objectives. They also show the means by which the policies are to be implemented<sup>1</sup>.

In the tables, the policies and their objectives are categorised according to the ABS's classification of interests in planning; economic, quality of life and environmental. It is the objective of the policy which determines under which interest it is categorised. For example, the policy of re-using derelict urban land is drawn from national legislation. It appears several times in the tables, because it has several objectives. It appears in Table 4.1 *National intensification policies with economic objectives 1987-1997*, because one of its objectives is to improve economic viability. It also appears in Table 4.3, *National intensification policies with environmental objectives 1987-1997* because, by developing on derelict land, it is hoped that environmental improvements may be made. Other policies only appear once because their objective is to benefit one interest. It should be stressed that splitting the objectives into these three categories could preclude a discussion of how they inter-relate. Therefore care will be taken to identify issues of overlap.

Following the identification and presentation of the policies, a critique of them, drawn from current literature and research, is presented. The critique has two purposes, both of which relate to clarifying information for use in the ABS. The first is to explore the validity of the stated objectives of the policies. It is the aim of this part of the critique to offer evidence to support or refute the claims made about cause and effect in the policies. It will enable judgements about policy success or failure to be more accurately made in the case studies.

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<sup>1</sup>This implementation information is used in the case studies, but is not referred to further in this chapter.

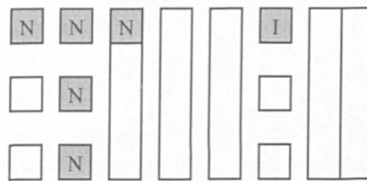
The second purpose is to present arguments, and identify impacts, which are not apparent in policy but are prevalent in the urban intensification debate. The effects of urban intensification are extremely far-reaching, and any evaluation has to consider both the intended outcomes and those which are unforeseen. This information is used to inform the 'impacts' section of the ABS in the case studies. From the literature review, the most important impacts in each category are selected and these are then measured in the case studies. Undertaking these critiques of the objectives of policies also helps to prioritise which data to collect, and which issues qualitative techniques, such as interviews, should focus on.

Throughout this chapter, and Chapters Six and Seven, use is made of diagrammatic versions of the ABS. These are used to show how the information which is being presented fits into the ABS structure (Fig. 3.1). They are presented so that the information can be easily followed. In each case the 'location' of the information is shown by shading in the appropriate box in the ABS.

#### 4.2 National intensification policies with economic objectives

N - national level

I - impact categories identified



##### 4.2.1 Economic objectives

Table 4.1 gives a summary of all urban intensification policies with economic objectives since 1987. The table shows that the economic reasoning behind intensification policies in the UK focuses predominately on the leverage achieved by improving urban areas to attract businesses and new residents, and thus to contribute to vitality and viability, and to aid urban regeneration (e.g. HM Govt, 1990; 1995; DoE, 1992a). The objectives are to make urban environments, especially town and city centres, more attractive places to live, so that urban populations will be restored and use their spending power to support local businesses. The improved vitality and regeneration should, it is claimed, make urban areas more attractive to prospective employers looking for desirable locations for their businesses, and consequently an upward spiral of economic benefits should accrue.

Although this reasoning has remained in place throughout the study period, in some ways its emphasis has changed. In the 1980s the aim was solely to facilitate local market-led economic development, to be achieved by creating the right conditions in urban areas to attract private sector investment, which would provide jobs and boost local economies (DoE, 1996a). However, towards the end of the 1980s and throughout the 1990s, urban economic policies have also embraced the concept of sustainable development, and their focus has now broadened to concern with 'balancing economic priorities with social and environmental issues' (*op cit.*,

Table 4.1 National intensification policies with economic objectives

Policy	Source	Objective	Means of implementation
Britain's environmental strategy	This Common Inheritance: Britain's Environmental Strategy (HM Govt, 1990)		
use land in urban areas to meet as much as possible of the demand for sites for new housing (6.47)	This Common Inheritance: Britain's Environmental Strategy (1990)	to maintain the vitality and viability of towns and cities (6.47)	by identifying sites in local plans (6.46) and using the derelict land grant where appropriate (6.67-6.69)
<b>Housing policy</b>	<b>Our Future Homes: Opportunity, Choice, Responsibility (HM Govt, 1995)</b>		
encourage a mix of uses in urban areas (p.47)	Our Future Homes: Opportunity, Choice, Responsibility (1995)	to increase vitality through activity and diversity (p.47)	by overcoming obstacles to mixed-use development (guidance commissioned by government) (p.47)
<b>Green belts</b>	<b>PPG2: Green Belts (DoE, revised 1995; 1988)</b>		
preserve the green belt (1995, 1988)	PPG2: Green Belts 1988, PPG2: Green Belts (revised) 1995	to assist in urban regeneration, by encouraging the recycling of derelict and other urban land (4, 1988; 1.5, 1995)	by maintaining a presumption against inappropriate development in the green belt (3.1,3.2, 1995; 12, 1988)
<b>Housing</b>	<b>PPG3: Housing (DoE, 1988; revised, 1992)</b>		
develop housing on suitable vacant land within urban areas (2, 1992)	PPG3: Housing (revised) 1992	to assist urban regeneration (2, 1992)	by bringing into use neglected, unused or derelict land and sites suitable for small scale housing schemes, and considering sites with extant, but unimplemented permissions for office and other uses (developers may need assistance in the form of City Grant and Derelict Land Grant) (15, 16, 1992)
ensure that housing is available where jobs are being created (3, 1992)	PPG3: Housing (revised) 1992	to contribute to national prosperity and economic growth; does not frustrate growth because people can find homes so they can take up new job opportunities (3, 1992)	by bringing into use neglected, unused or derelict land and sites suitable for small scale housing schemes, and considering sites with extant, but unimplemented permissions for office and other uses (developers may need assistance in the form of City Grant and Derelict Land Grant) (15, 16, 1992)



<p>LPAs should aim to ensure the availability of five years supply of housing land, judged against the general scale and location of development provided for in approved structure and adopted local plans. This land must be genuinely available in terms of planning, physical and ownership constraints and be capable of being developed economically; i.e. it must be suitable for the wide range of housing types and locations which the market requires (46, 1995)</p>	<p>PPG3: Housing (revised) 1992</p>	<p>to provide an adequate and continuous supply of land for housing; to promote home ownership and some private renting; to aid urban regeneration and to contribute to national prosperity (2, 3, 1995)</p>	<p>LPAs and housebuilders should co-operate on joint studies to assess land availability. In urban areas measures the local authority could take include securing the provision of infrastructure for particular sites (48,49, 1995)</p>
<hr/> <p><b>Industrial and commercial development and small firms</b></p>			
<p>make optimum use of under-used or vacant land in urban areas (1, 1988), especially that once used for industrial purposes and consider using existing premises for labour-intensive uses (21, 1994)</p>	<p>PPG 4: Industrial and Commercial Development and Small Firms 1988, 1994</p>	<p>to aid urban regeneration (1, 1988; 21, 1994)</p>	<p>LPAs should identify such sites in their local plans and keep up-to-date details on them to provide to potential developers (21, 1994)</p>
<p>permit businesses in existing residential areas, especially light industry, offices and small businesses (8,9, 1988)</p>	<p>PPG 4: Industrial and Commercial Development and Small Firms 1988</p>	<p>to aid the expansion of the economy and of employment (1, 1988)</p>	<p>by permitting development in residential areas unless specific and convincing objections are raised (10, 1988)</p>
<hr/> <p><b>Town centres and retail developments</b></p>			
<p>sustain and enhance the viability and vitality of existing town centres (1.1, 4.2, 1996; 1, 1993)</p>	<p>PPG6: Town Centres and Retail Developments (DoE, revised, 1993; revised, 1996)</p>	<p>to promote sustainable development, and facilitate competition from which all consumers can benefit (1, 1993; 1.2, 1.1, 1996)</p>	<p>LPAs should take a positive approach to retail development in partnership with the private sector, and identify sites in development plans using a sequential approach. They should also produce development briefs for key town centre sites (1.9, 1996; 17, 1993). A town centre management strategy should be drawn up to address those issues which lie outside the land use planning remit, and a town centre manager could be appointed (Annex C, 1996)</p>

encourage the diversification of uses in town and city centres (2.11, 2.12, 1996; 5-7, 1993)	PPG6: Town Centres and Retail Developments (revised) 1993; (revised) 1996	to contribute to the vitality and viability of existing centres and to encourage more people to live and work in centres as these stimulate shopping, restaurants and other businesses to serve them (6.7, 1993; 2.11, 1996)	LPAs should use development plans to set out policies for mixed-uses, and adopt a pro-active approach to changes of use and encourage conversion to other service and retail uses of buildings, especially offices which may be vacant (2.12-1.15, 1993, 1996)
restrict development of major new retail developments - they should be allowed only under specific circumstances (4.12, 1996; 21, 1993)	PPG6, Town Centres and Retail Developments (revised) 1993; (revised) 1996	to safeguard the economic interests of town centres, local centres and villages (4.13, 1996; 21, 27, 1993)	LPAs should consider the incremental effects of new developments and the cumulative effects of recently completed developments and of outstanding planning permissions in the catchment areas of proposed new centres (4.16, 1996)
<b>Sport and recreation</b>			
balance the need to sustain the vitality and viability of towns and cities and urban regeneration with the need to protect the quality of the urban environment (28, 1991)	PPG 17: Sport and Recreation, 1991 (DoE, 1991)	to attract business and tourism, as it is part of the urban regeneration process (25, 1991)	by designating urban open space of different types on the proposals map and in the policies of the local plan, and taking account, in development control decisions, of the impact of a reduction in open space, and whether it is to be replaced with similar community benefit (27, 1991); by placing poorly maintained, publicly owned land on registers of publicly owned vacant land - use can be made of the Derelict Land Grant for its development (28, 1991)
<b>Tourism</b>			
develop derelict sites and redundant buildings for tourist uses (4.14, 1992)	PPG 21: Tourism (DoE, 1992)	to aid urban regeneration (4.14, 1992)	by considering tourism options for derelict land and redundant buildings when developing local plans (4.14, 1992)

p.37). An important implication of this change has been the turnabout in policy towards safeguarding the economic interests of existing town centres. During the 1980s, it was not seen as a legitimate role of the planning system to intervene in the market to protect private businesses. However, the sustainable development agenda has meant that consideration now has to be given to existing centres because of the social role they play, their accessibility to those without cars, and their trip-reducing potential. Thus, consideration can now be given to safeguarding the economic interests of town centres, local centres and villages.

### 4.2.2 Economic policies

To achieve these objectives, national policies have fallen broadly into two categories. First, there are those which relate to the provision of land in urban areas for economically beneficial uses, and to the restriction of development in other areas. These policies stress the need for local authorities to use their development plans to allocate urban land for employment, retail and business uses (e.g. DoE, 1992a; 1988c). In particular, they emphasise the importance of using derelict and vacant land in urban areas to meet these needs and to contribute to urban regeneration. This type of policy is coupled with restrictions on out-of-town locations for employment and retail uses, including the sequential test for retailing, introduced in PPG6 (DoE, 1996b), which means that applications for major new retail developments must be accompanied by evidence showing that they are located on the most central sites available.

Second, there are policies aimed at improving local economic viability by achieving a mix of uses and diversity in urban areas (e.g. DoE, 1993c; 1996b). These policies attempt to develop the mixed-use, compact city favoured by the CEC, but also to aid economic regeneration and reverse the decline of metropolitan areas. The policies stress moving away from functional segregation, and advocate ensuring that houses are available where jobs are provided, permitting light industry, offices and small businesses in residential areas, and encouraging diversification of uses in town and city centres (e.g. DoE, 1988c; 1994a). They also stress the opportunities for mixed-use which could be created by developing vacant and derelict land for a number of uses including tourism, housing, retail and employment (e.g. DoE, 1992c; HM Govt, 1990).

Attention should also be drawn to the overriding importance attached in policies to balancing economic objectives with those of quality of life and the environment. In particular, the need to balance the increased vitality and liveliness of existing centres with the need to protect the character of the urban environment and quality of life is paramount (e.g. DoE, 1988b; 1992a). Therefore, issues such as the need to balance the aims of economic development with the need for open space in towns and cities appear in policies, as do regulations to ensure that bad neighbour effects are kept to a minimum in mixed-use areas.

### **4.2.3 Critique of economic objectives and policies**

The economic objectives and policies supporting urban intensification in the UK have a specific, and perhaps limited, remit; the economic potential of intensified areas to produce more attractive environments for private sector investment. In contrast, the economic arguments in theory and research are considerably more far-reaching and complex. The critique presented below first examines the claims made in policy, then elaborates the wider economic issues.

**4.2.3.1 Does urban intensification contribute to vital and viable local economies?** - As stated above, the focus of economic objectives in UK policies is the leverage ability of more attractive and diverse urban areas to attract, and support, private investment. Indeed, the UK's strategy for sustainable development supports the view that higher density, larger urban areas can better support local businesses, especially services (HM Govt, 1994). However, scepticism about the likely success of these policies comes from those who juxtapose the scale of the policy solution with that of the problem; local solutions are proposed for problems that are often global in nature.

Many of the UK's weakest urban economies are those that have suffered through global economic restructuring. In such economies the loss of dominant local employers, for example in traditional manufacturing industries, mining and port-related industries, has led to urban and regional decline. The solution, in contrast, is for area-specific policies and plans (DoE, 1996a), and this has led to considerable debate over both the relevance of these types of policies, and the role that intensification policies have in the broader solution. At the Habitats and Shelter Conference, in 1996, the UK government suggested that major debate still surrounds, among other issues:

... the relevance of local economic development in the face of global economic forces and national macro-economic policies, and its capacity for seriously affecting local levels of employment or prosperity: and the real costs and benefits of the policies for local economic development and urban regeneration (DoE, 1996a, p.40).

Nevertheless, some encouragement can be gained from examples of urban areas in the UK which have used urban intensification as a component of urban regeneration. For example, Gossop (1991) has argued that examples from Birmingham show that concentrating economic resources back into urban areas can promote the local economy. He highlights examples where urban intensification was promoted in mixed-use areas; the effect of investment rippled outwards to neighbouring communities. He also believes that the subsequent upgrading was behind Birmingham's success in obtaining Government Estate Action funding to tackle problems in adjacent neighbourhoods, thus perhaps illustrating the upward spiral effects suggested in policy. Similarly, the often detrimental effects to town and city centres of major out-of-town retail developments can also be seen as evidence of the negative effect on local economies of allowing dispersed economic development.

**4.2.3.2 What are the wider economic implications of urban intensification?** - As stated above, the narrow focus of intensification policies to achieve economic objectives in the UK is in stark contrast to the complex economic arguments surrounding urban consolidation in research, and in policies, in other parts of the world. For example, the Australian government has followed a programme of urban consolidation, primarily for economic reasons, since the late 1970s, based on the savings to be made in public spending on infrastructure. The arguments are that the provision of roads, sewerage systems, street lighting, other utilities, and municipal services such as refuse collection, are far cheaper in higher density urban areas than in low density suburbs, and thus, by developing in existing urban areas and increasing densities, considerable savings could be made in municipal spending (Access Economics, 1994). This rationale is in sharp contrast to the situation in the UK where 'Local authorities, in general, have no information on the relative costs of alternative forms of development, and have been found to be almost totally uninterested in the matter' (DoE, 1993b).

However, although many urban consolidation programmes have been implemented in Australia, there are those who question the simplicity of the cost-saving arguments and believe that the economic accounting is far too naive (Troy, 1992). It has been argued that many urban areas simply do not have spare infrastructure capacity, and that upgrading old infrastructure could be as costly, if not more, than providing new infrastructure on greenfield sites (Minnery, 1992; DoE, 1993b). Furthermore, maintaining that infrastructure, if it is overloaded, could prove very expensive (DoE, 1993b). A recent review of the debate surrounding this issue concluded that the arguments put forward by authors such as Stretton (1989) and Troy (1992), that comparative costs of both the physical and social elements of infrastructure are no cheaper to provide in consolidated areas than in the suburbs, have considerable weight. This is because the complete range of economic costs and benefits are rarely quantified (Haughton and Hunter, 1994).

An ambitious attempt to quantify the economic consequences of intensification policies in Australia was undertaken by Dunstone and Smith (1994). In their paper *Is Urban Consolidation Economical?* they use a traditional cost-benefit analysis to investigate the economic and financial arguments surrounding urban consolidation policies, and analyse a whole host of costs, not taken into account in UK policies or in much of compact city theory. They identify groups of stakeholders, such as government, businesses, property owners, local employers, existing residents, new residents, environmentalists, taxpayers and rate payers, and determine their economic interests, and how they are affected by intensification. For example, they highlight the private economic costs to urban residents if the value of their homes is reduced due to over-development, or private costs of increased travel times due to congestion, in terms of fuel and time. They conclude that there is a complex relationship of economic winners and losers, and that the reasoning for consolidation policies in Australia is political rather than economic. They argue that consolidation policies have been followed on the misunderstanding

that they offer savings in public spending on infrastructure, but that there is a hidden agenda of economic cost-shifting to the private sector and the community.

Although Dunstone and Smith's work is commendable in its identification of economic stakeholders, it can be criticised for predicting the costs and benefits to these stakeholders on a theoretical, rather than empirical basis<sup>2</sup>. For example, their prediction of costs to private travel are questionable: they argue that, due to intensification, congestion will increase and thus private costs accrue. In contrast, McLaren argues that consolidation will benefit the economy by reducing traffic, and will lead to personal savings in time and money spent travelling (McLaren, 1992). Dunstone and Smith also argue that house prices will fall if a neighbourhood is 'densified', and yet an empirical study by Babbage (1993) concludes that this is not the case.

Dunstone and Smith can also be criticised for failing to identify all economic consequences of intensification because they do not compare it with other policy options, such as new settlements or peripheral development. They do not explore the opportunity costs of urban consolidation. Such an analysis has been undertaken in the UK (DoE, 1993b). Although the report *Alternative Development Patterns: New Settlements* does not attempt as detailed an analysis as that of the Australians, it does draw attention to some important comparative issues, and looks specifically at the economic benefits and costs of urban infill in comparison with four other location options<sup>3</sup>. The report picks out indicators of economic performance. It looks at the cost of the end product, the cost of providing infrastructure, the ability to achieve planning gain, access to employment and maintenance costs. Infrastructure and maintenance costs have been discussed above, but the other indicators are worth considering.

The research found that comparing the cost of the end product between different generic forms was extremely difficult, and complicated by a number of factors, such as variations in on-site costs, off-site costs and differences in the amount of planning gain required. However, it concluded that on infill sites net margins for the developer are lower than on greenfield sites. This is because development costs are higher because of the costs of site clearance, reclamation and longer construction times. Also, because many housing developers rely on the volume of development to make more total profits, they have a preference for greenfield sites, where they can benefit from economies of scale (*op cit.*). In terms of planning gain, the report concluded that the most gain can be achieved under a number of specific circumstances, which include the development scheme being large and preferably free-standing. Therefore, urban infill is judged to fare badly in securing planning gain, as developments are usually smaller than those on greenfield sites.

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<sup>2</sup>The contextual nature of Dunstone and Smith's work is also realised. Whilst their method may be useful in many contexts their findings relate only to New South Wales.

<sup>3</sup>The settlement types compared are urban infill, urban extensions, key villages, multiple villages and new settlements.

Infill development was, however, seen to offer good access to employment. The report concluded that 'An existing town or city is likely to offer a wide variety of employment opportunities, increasingly in the service industries. For those seeking such work, urban infill offers the best advantage' (*op cit.*, p.22). However, it does point out that, for a number of employment sectors, such as high-tech and expanding industries, the current trend is for peripheral locations.

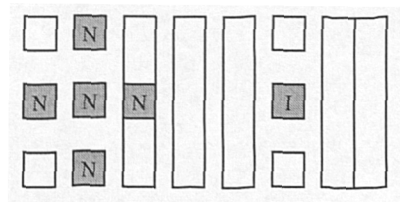
It seems then, that the economic impacts of urban intensification policies are far-reaching and complex, and stretch much further than the narrow, wholly positive, focus of UK policy. The review here has been useful in that it has identified research which sets out economic impacts not included in UK policy, and these can help determine the comparative success of policies. Although using the costs and benefits identified by Dunstone and Smith would require some very sophisticated accounting, which is beyond the scope of this research, use can be made of their arguments and those of others included in this review about the main economic stakeholders. Therefore, in the case studies, the research looks for evidence of:

- improved vitality and viability of centres due to higher population densities which provide a critical mass to support businesses, and because planning policies are reducing competition from out-of-town developments
- benefits to the LPA in terms of cheaper infrastructure provision
- house prices increasing, because the area is improved due to intensification
- reduced private travel costs to businesses and residents because trip lengths are reduced and traffic volumes reduced
- higher housing costs because infill housing is more expensive to produce than housing on greenfield sites
- higher maintenance costs, because infill increases wear and tear on the existing urban infrastructure
- improved access to employment for urban residents because homes are located near workplaces
- fewer opportunities to secure planning gain because infill developments are usually smaller than those on greenfield sites

### 4.3 National intensification policies with quality of life objectives

N - national level

I - impact categories identified



### 4.3.1 Quality of life objectives

Table 4.2 shows that quality of life objectives surrounding urban intensification policies focus on three related issues. The first is the ability of urban areas to provide land to meet housing needs in the most sustainable way (e.g. HM Govt, 1990; 1994). Throughout the study period one of planning's primary objectives has been to ensure that there is a ready supply of land for housing. However, as stated in Chapter Two, during the late 1980s and 1990s the emphasis changed to that of developing as much housing as possible within existing urban areas, close to existing facilities including shops, public transport interchanges, schools and so on (e.g. DoE, 1988b; 1992a). Specifically, urban areas are seen as a potential location for smaller homes too, to help meet the needs of one and two person households (e.g. HM Govt, 1996; DoE, 1992a). Building more homes in urban areas is also argued to contribute to social sustainability through regeneration and the rebuilding, or building, of communities.

The second quality of life objective relates to the ability of urban intensification to upgrade and improve towns and cities, and therefore foster civic pride, local identity, community spirit and safety (e.g. DoE 1996b; HM Govt, 1996). This goal is achieved by maintaining or increasing population densities which support local services and facilities. The consequent increases in activity are also hoped to reinforce the attractiveness of urban areas, especially town centres, at night and day. This type of regeneration should make urban areas as attractive to UK residents as they are to their continental European counterparts, and develop thriving cities, filled with restaurants, cafes, cultural facilities and so on. It is also hoped that the increased numbers of people will mean that urban areas feel safer and that, as a result, public spaces will be used more fully, again enhancing vitality and liveability of towns and cities (e.g. HM Govt, 1995; DoE, 1996b).

The third set of objectives relate to improving social equity, although they are not expressed explicitly as such in policy. They concentrate on the accessibility of services and facilities, and aim to make essential amenities accessible to all urban residents, regardless of their income, age or gender (e.g. DoE, 1996b). The reasoning is that high population densities reach the thresholds which enable the mix of uses in the city to be supported locally. Therefore local services and facilities can be maintained within a short distance of residential areas. This makes accessibility by emissions-efficient modes of transport, such as walking, public transport or bicycles viable. These policies thus have important implications for those who are less likely to have access to a car, such as children, teenagers, women and the elderly, and also have cross-over benefits to the environment.

### 4.3.2 Quality of life policies

In order to achieve these objectives, policies focus on using the planning system to create a positive framework for investment in urban areas. National policies state that housing should be located within urban areas, often on infill sites, where appropriate at higher densities (e.g. HM Govt, 1996). LPAs are advised to use local plans to allocate land for development in



**Table 4.2 National intensification policies with quality of life objectives**

Policy	Source	Objective	Means of implementation
<b>Housing policy</b>			
encourage a mix of uses in urban areas (p.47)	<b>Our Future Homes: Opportunity, Choice, Responsibility (HM Govt, 1995)</b>	to make urban areas safer (p.47)	by overcoming obstacles to mixed-use development (guidance commissioned by government) (p.47)
<b>UK's strategy on sustainable development</b>	<b>Sustainable Development: the UK Strategy (HM Govt, 1994)</b>		
use the most developed areas in the most efficient way, while making them more attractive places in which to live and work (p.158)	Sustainable Development: the UK Strategy (1994)	to meet aims of sustainability by making the most of urban areas (p.158)	by supporting initiatives aimed at urban regeneration, using the planning system to encourage attractive, convenient urban areas (p.158)
reuse vacant and derelict land and reuse buildings that are not in use (p.162)	Sustainable Development: the UK Strategy (1994)	to aid regeneration and provide housing (p.162)	L.PAs should work in partnership with the private sector and other bodies and seek grants from English Partnerships to bring derelict land back into use (p.162)
<b>Housing location (discussion document)</b>	<b>Household Growth: Where Shall We Live? (HM Govt, 1996)</b>		
encourage higher density, mixed-use developments in urban areas (p.30)	Household Growth: Where Shall We Live? (1996)	to contribute to a sense of community (p.30)	by using the planning system to encourage higher densities, but in appropriate places, and with good design (p.30)
<b>Housing</b>	<b>PPG3: Housing (DoE, 1988; revised, 1992)</b>		
adapt existing housing and develop infill sites in residential areas to accommodate smaller households (20, 1992)	PPG3: Housing (revised) 1992	to meet the needs of the increasing number of smaller households, within existing residential areas (20, 1992)	by infilling, redevelopment and conversion in existing residential areas (20, 1996); by bringing empty and underused <i>floorspace above shops back into use</i> for housing (15, 1992)
achieve a reasonable balance between the need to make adequate provision for development, and the need to protect open land from development (27, 1992)	PPG3: Housing (revised) 1992	to protect land for recreation and amenity purposes, e.g. parks, playing fields, informal open spaces, allotments and private gardens (27, 1992)	by developing clear planning policies in the local plan which ensure that the provision of open space is properly co-ordinated with proposals for development and other land use policies (27, 1992)

<b>Town centres and retail developments</b>	
locate major generators of travel in existing centres (1.3, 1996; 11, 38, 1993)	<p>PPG6: Town Centres and Retail Developments (DoE, revised 1993; revised, 1996)</p> <p>PPG6: Town Centres and Retail Developments (revised) 1993; (revised) 1996</p> <p>to meet the aims of sustainable development by making access by a choice of means of transport, not only by car, easy and convenient (1.2, 1.3, 1996; 11, 38, 1993)</p> <p>L.PAs should make themselves fully aware of the impact of development on overall travel patterns and give weight to that factor (38, 1993). Following consultation with business interests and local communities Structure Plans and UDP Part Is should set a hierarchy of centres, with a strategy for the location of trip-generating activities. Local Plans and UDP Part IIs should identify sites for development. The LA may have to take action to assemble land, including compulsory purchase. A sequential approach should be adopted so that first preference is for town centre sites (1.5, 1.6, 1.11, 1996). Contributions to new or improved public transport can be obtained through planning obligations (4.6, 1996)</p>
provide a positive planning framework to encourage investment in town centres (2.3, 1996; 14, 1993)	<p>PPG6: Town Centres and Retail Developments (revised) 1993; (revised) 1996</p> <p>to foster civic pride and local identity and promote sustainable development (2.1, 1996; 14, 1993)</p> <p>The planning system should provide a framework which encourages the development of town centre strategies and enables town centre development by facilitating site assembly, attracting investment to upgrade existing buildings and provide good quality new developments. It should also encourage investment in a mix of key urban uses: employment, housing, retail; encourage high quality design and good access and promote town centre management (2.3, 1996). Use could be made of the Single Regeneration Budget, City Challenge, English Partnerships and the Department of Transport's 'package bids' (2.8, 1996). LAs should also ensure centres are well managed, safe, clean and available for special events (14, 1993)</p>
encourage the diversification of uses in town and city centres (2.11, 2.12, 1996; 5-7, 1993)	<p>PPG6: Town Centres and Retail Developments (revised) 1993; (revised) 1996</p> <p>to reinforce the attractiveness of town centres at night and during the day, and make them attractive to residents, shoppers and visitors (2.12, 1996; 6, 1993). A mixture of uses can also increase activity and therefore personal safety (2.13, 1996)</p> <p>L.PAs should use development plans to set out policies for mixed-uses which increase viability and vitality (2, 12, 1996; 33-37, 1993). They should adopt a pro-active approach to changes of use and encourage conversion to other service, leisure and retail uses of buildings, especially offices which may be vacant (2.12-1,15, 1996)</p>

<p><b>Development plans and regional guidance, local plans</b></p>	<p><b>PPG 12 Development Plans and Regional Planning Guidance (DoE, 1992) PPG 12 Local Plans (DoE, 1988)</b></p>	<p>ensure that development plan policies consider the existing infrastructure capacity and that the need for additional facilities is adequate - infrastructure includes services like health, education, roads, water and sewers (5.22, 1992)</p> <p>to co-ordinate the needs of new development with the infrastructure it demands (5.23, 1992)</p> <p>Infrastructure agencies will have more certainty now that the new plan led system is in place, so they can plan provision more accurately (5.24, 5.37, 1992). LPAs can seek planning obligations for contributions to meet infrastructure needs (5.25, 1992).</p>
<p>permit the conversion and adaptation of the existing housing stock, or redevelop or use vacant land in older established residential areas (22, 1988)</p>	<p>PPG12: Local Plans, 1988</p>	<p>to meet the needs of the changing types of housing required, i.e. provide for dwellings for one and two person households (22, 1988)</p> <p>by including provision for such changes in the local plan, but to also allow the prescription of density and other policies in order to protect the character of established residential areas (22, 1988)</p>
<p><b>Sport and recreation</b></p>	<p><b>PPG17: Sport and Recreation, (DoE, 1991)</b></p>	<p>to ensure that those living in urban areas, especially the elderly and children, have access to recreational and open space close to where they live, and to improve the quality of life in urban areas (25, 1991)</p> <p>by designating urban open space of different types on the proposals map and in the policies of the local plan, and taking account, in development control decisions, of the impact of a reduction in open space, and whether it is to be replaced with similar community benefit (27, 1991)</p>
<p>achieve a reasonable balance between the need to make adequate provision for development in urban areas and the need to protect open space from development (27, 1991)</p>	<p>PPG17: Sport and Recreation, 1991</p>	<p>to ensure that those living in urban areas, especially the elderly and children, have access to recreational and open space close to where they live, and to improve the quality of life in urban areas (25, 1991)</p> <p>by designating urban open space of different types on the proposals map and in the policies of the local plan, and taking account, in development control decisions, of the impact of a reduction in open space, and whether it is to be replaced with similar community benefit (27, 1991)</p>

existing urban areas, especially on derelict or vacant land (e.g. HM Govt, 1994; DoE, 1992a). They are also urged to develop local policies which do not unduly limit higher density development in urban areas, and that encourage a mix of uses. Emphasis is also given to policies which encourage more intensive use of the existing building stock, for example, reusing buildings that are not in use, considering changes of use that bring vacant buildings back into use, and adapting existing housing to accommodate more people (DoE, 1992a). To support the objective of improving accessibility, policies also stress the need to locate trip-generating facilities in urban centres, or at transport nodes, where people can access them easily by a range of means of transport (e.g. DoE 1993c; 1996b).

As with policies with economic objectives, those concerned with improving quality of life are also concerned with balance. For example, although higher densities are supported to increase vitality and feelings of safety, the policies still stress the need to balance these aims with those of the environment in terms of protecting land such as parks, playing fields, allotments and private gardens. As PPG3 states 'Policies which seek to make maximum use of vacant land for housing will need to distinguish between sites which need to be retained for recreation, amenity or nature conservation purposes, and areas which are genuinely suitable for development' (DoE, 1992a, para.24).

### 4.3.3 Critique of quality of life objectives and policies

As with economic issues, the focus of policies and their objectives for improving quality of life through urban intensification is narrower than the wider debate in research. National policies, although cautious about 'town cramming' and over development, are very positive about the ability of urban intensification to improve the quality of urban life (HM Govt, 1994). Within them is a clear image of high quality urban living, characterised by safe streets, good public transport, cultural facilities and access to a variety of goods and services. A review of research in this field shows that there are strong counter-arguments which criticise what is seen as an over-romanticised view of high density urban living (Breheny, 1992b, 1996a). This critique reviews evidence and research surrounding the assumptions embodied within the policies. It concentrates mainly on empirical work and avoids the wealth of writing which stems from more personal preferences for either urban, or suburban, living.

#### 4.3.3.1 Does providing more homes in urban areas lead to a better quality of life? -

Measurements of quality of life are notoriously contentious (Findlay *et al.*, 1988; 1989), and when combined with the issue of density, become even more politically sensitive (Troy, 1996). The task here is to look for evidence of how urban intensification has affected the quality of life of urban residents, to see whether it makes urban living better or worse for those who live in towns and cities. Much has been written from a theoretical perspective on this issue, but little empirical work has been done (Burton *et al.*, 1996). However, research undertaken for the DETR (forthcoming) did address the issue directly, by asking residents who lived in twelve intensified areas in the UK how intensification had affected their neighbourhood. The findings

were that, on the whole, people thought intensification made an area worse. They were asked to comment separately on increases in activity and development, and activity was seen to have a far more negative effect than development (see Figs 4.1 and 4.2). In particular, residents thought that traffic problems were severe, and that facilities and services were overstretched. They also reported loss of open space as contributing to a reduction in the quality of urban life.

Fig 4.1 Perceived effect of development intensification by case study area (% respondents)

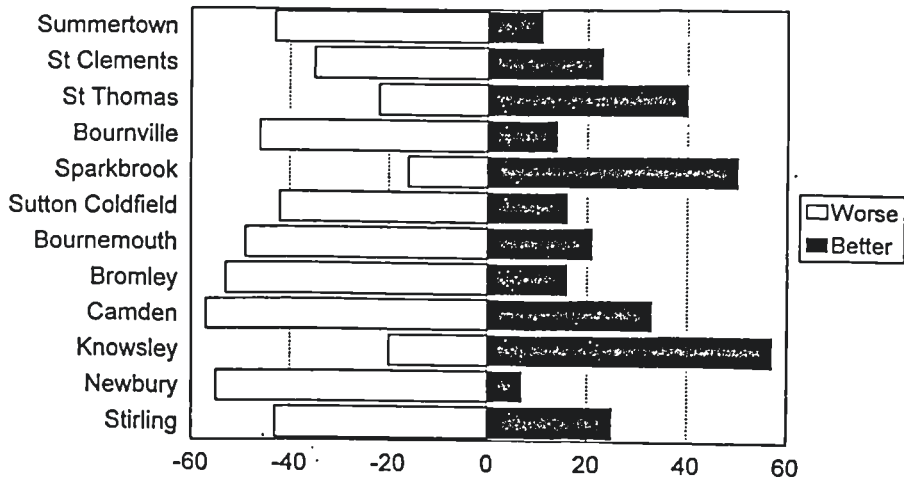
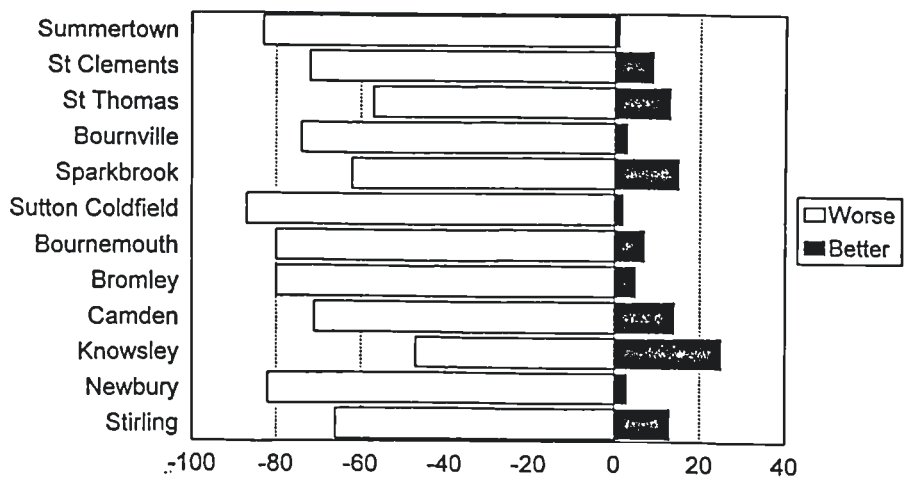


Fig 4.2 Perceived effect of activity intensification by case study area (% respondents)



Nevertheless, in a few of the case study areas (see Knowsley and Sparkbrook) responses were far more positive, and residents reported that facilities had improved, and that community spirit was better due to more people living in the area. The key differences in responses depended on many factors, including the character of the area being intensified and the type of intensification occurring. In general, less prosperous areas, with higher proportions of people in lower social classes (by occupation), were more positive about intensification. In these types of area it was seen as modernisation and upgrading. However, in more prosperous areas, especially lower density suburban areas, intensification was seen as having a detrimental effect on the quality of life, and associated with town cramming. The type of intensification also made a difference. For example, if development was small scale, and for the same use as the rest of the neighbourhood, then it was viewed less negatively, but if it consisted of a new use, such as a retail unit in a residential area, then it was usually seen as reducing quality of life.

Perhaps surprisingly another important finding of the DETR's research was that density *per se* did not seem to affect people's satisfaction with their locality, or their quality of life. Other research undertaken by Goodchild (1984) came to the same conclusion. The DETR research found that increases in density, rather than variations between existing densities, were significant, indicating perhaps that people are adverse to change. It appeared that those who had chosen to live in low or medium density areas wanted them to stay that way, whilst those in higher density, mixed-use environments were usually far more amenable to increased densities. Goodchild's work mirrors this finding. In particular it indicates that non-family households are often willing to trade off personal space for the location and social status of city centre homes (Goodchild, 1984).

The conclusion from the DETR (forthcoming) research is that the overall experience of intensification is negative, but that it can improve the quality of urban life, in some places if it is very carefully managed. The type of area in which intensification is happening, the type of people who live there, and the type of intensification that occurs are all important. This complex finding means that national policies have to be very carefully interpreted by LPAs if intensification is going to improve the quality of life in urban areas, rather than be associated with negative impacts.

**4.3.3.2 Does urban intensification improve a city's vibrancy and culture, and lead to a sense of community and local identity?** - The objective of intensification policies to create vibrant, culturally rich urban areas, which are busy in the daytime as well as during the night, has gained some significance in policy over the last five years or so. In fact, urban culture has now become a significant policy issue (Breheny, 1996a; Montgomery, 1995). In the UK the promotion of urban culture has become a key method of urban renewal, and intensification policies are an element of this. Influential figures such as Richard Rogers (1995) have promoted the virtues, in terms of culture, of compact urban living. In policy, too, the causal

relationship between urban culture and higher densities is frequently made. The question here is whether there is any proof that this relationship exists.

Some measure of support for it comes from the DETR's work on intensification, in which some urban residents stated that new development had attracted new people to their neighbourhoods and that this led to more facilities being located nearby (DETR, forthcoming). Many stated that their localities had become more vibrant and lively, and that development had upgraded their area, and improved their quality of life. Some also indicated that their communities had benefited from new people moving into their localities. But these findings need to be viewed alongside responses from residents who complained of overcrowding, or that too many visitors to their neighbourhood were leading to facilities being overstretched. Some residents also resented new people moving into their neighbourhoods, especially if they perceived them to be a 'different type of person', for example those requiring affordable housing, students or people of different cultures or ethnic groups.

This finding echoes concerns raised by Breheny (1992a, 1996a) who disputes that the images of the culturally vibrant urban core, so loved by advocates of the compact city, represent what compact urban living would be like for the majority of people. He argues that this view of urban life is 'romanticised' because, whilst those who live in the heart of the city could enjoy this type of benefit, for most people the real manifestation of the compact city would be 'high density suburban living' (Breheny, 1992a, p.152). Furthermore, most urban centres are not desirable locations in which to live, and out-migration is proof of this. In effect, ideas about revitalising urban cores, or city centres, have become confused with arguments about what urban intensification would mean in other locations, such as the suburbs (*op cit.*).

Other authors have also questioned the basis for this policy objective, suggesting that it is linked with an out-dated view of the split between the city centre and the suburbs. For example, Houghton and Hunter argue that, 'high urban population densities are still seen by many policy makers and urban development professionals as conducive to creativity: built-up central city areas are said to be vibrant, whilst suburbs are monotonous' (1994, p.83). This is certainly the view of the CEC which, in its *Green Paper on the Urban Environment* (1990), denigrates the suburbs as monotonous and lacking in culture. However, this view is challenged by Troy (1996) who argues that this model of urban life is elitist and that those with the time and money to eat out, spend time in cafes and art galleries and explore antique shops form a minority of the population. He suggests that the equation which links high density with more vibrancy and culture is wrong, and that the proliferation of coffee shops, bistros, restaurants and sidewalk cafes in most cities over recent years is a response 'to changing social behaviour, increasing affluence, the commodification of leisure, and to the needs of tourists ...' (Troy, 1996, p.163), rather than any change in urban form.

Overall it appears that opinions are polarised. Observations and experience of dense urban cores clearly indicate that high residential densities of people are a component of vibrancy and liveliness, but there are also negative effects associated with higher density living. However, the role that continued intensification can play in causing these urban qualities is questionable. Intensification is possibly an element in the equation, but it does not seem to be the key factor that many advocates of high density purport it to be. Furthermore, arguments concerning the effects of intensification on suburban locations are important. Urban centres have a special character and to impose the same aspirations for liveliness, cultural vibrancy and vitality on the suburbs appears to be a critical flaw in intensification policies.

**4.3.3.3 Does urban intensification improve safety?** - The causal relationship which equates higher densities with safety, or perceptions of safety with intensification, is common in intensification policies (HM Govt, 1995; DoE, 1996b). The reasoning is that more people in public places means that there is better surveillance and, therefore, less crime, and that increased numbers of people in the public realm add to feelings of security, and thus the fear of crime is also reduced. However, again public perceptions are often the opposite of this line of reasoning. Cities are commonly associated with violence and danger, and fear of crime is often cited as one of the main reasons for counter-urbanisation (Crookston *et al.*, 1996; McLaren, 1992).

So where does the truth lie? As is often the case, it appears to lie somewhere in between these two viewpoints. Fortunately there is now a reasonable amount of research on this issue, and most of it concludes that there is no relationship between density and crime levels *per se.* and that other factors such as deprivation and gender are far more likely to explain crime figures (Wedmore and Freeman, 1984). There is some evidence that there may be a relationship between a size of a city and its crime rates; research has shown that larger cities have disproportionately higher crime rates (Walmsey, 1988). But when cities of similar size are compared, then density does not seem to be a causal factor. Other research, however, which took one city, Los Angeles, and compared crime rates across densities within it, found that violent crime increased with lower densities (Wedmore and Freeman, 1984). From this observation, Wedmore and Freeman concluded that areas of compactness within a city may have a slight effect in reducing crime rates, due to the surveillance effects, as suggested in UK policy.

More than actual crime rates, the fear or perception of crime levels may be influential in the choices people make about where to live (Crookston *et al.*, 1996). If people do not feel safe they will choose to leave the cities. Although density does not seem to have any major effect on actual crime rates it may affect how people feel. In particular, certain types of high density housing design, such as deck-access high-rise flats, have been associated with fear of crime in the past because people felt trapped in them, and unsafe in communal spaces, such as stair wells and lifts. Yet on the streets and in the public realm it seems that higher densities of



people do contribute to perceptions of safety (Collier, 1992). But many people still feel safer in residential suburbs, where they know their neighbours, than in city centres (*op cit.*).

**4.3.3.4 Does urban intensification improve access and social equity?** - The equity alluded to in intensification policies is concerned with access to services and facilities for all urban residents, in terms of both 'physical' access and opportunity. The contention is that intensified areas provide more facilities locally and that these are within the reach of those without access to a car. Several pieces of research have investigated this issue, and again, the findings are more complex than the straightforward cause and effect suggested in policies.

There is considerable research to support the claims that higher densities and mixed-uses improve accessibility. Research by Guy and Wrigley (1987) found that new forms of peripheral housing have very poor levels of accessibility to basic facilities such as food shops and post offices. Other commentators, such as Elkin *et al.* (1991), have argued that accessibility has worsened for a large proportion of the population during the last decade or so because of decentralisation of services, and closure of local shops, schools, hospitals etc. They also argue that public transport is better in higher density areas because bus and train services are more viable. Research done by Rees (1988) highlights the worsening situation for the transport disadvantaged of the trend for out-of-town retail warehouses. Finally, research by Hillman *et al.* (1976) and Farthing *et al.* (1996) showed that local provision of shops and facilities enabled easy access by non-car modes of transport.

Some have questioned the importance of these types of argument in the light of actual patterns or trips made. For example Breheny (1996b) argues that this emphasis on local facilities neglects the significance of specialist goods and services which, by definition, are unlikely to be provided in every neighbourhood. Others have argued that concentrating on urban trip patterns is misguided, since transport patterns are now more significant at the regional level, as people are willing to travel further for work and leisure (Handy, 1992).

Another conjecture is that any benefits to equity in terms of accessibility will be at the cost of other, equally important, elements of urban life. Stretton (1996), for example, argues that in intensified areas private space is traded for accessibility and that, in his view, space is more important. He argues that urban houses are smaller and often lack gardens, and this reduces quality of life more than changes in accessibility. He also believes that increasing densities will have a negative impact on other aspects of quality of life because vehicles will be more concentrated in urban areas, thus leading to localised air pollution, congestion and parking problems (*op cit.*).

#### **4.3.4 Conclusions about quality of life implications of urban intensification**

Again, the findings of the review of quality of life issues reveals a wide range of potential impacts, only a few of which appear to have been taken into account in formulating policy. It

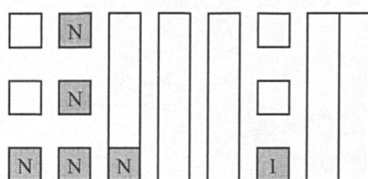
also emphasises how the issues overlap with other objectives of intensification policies. However, the most important impacts both positive and negative, which will be investigated in the case studies, appear to be:

- a reduction in private space, smaller houses and smaller gardens, or no gardens
- better facilities because there are more people to support them
- safer centres due to increased numbers of people in the public realm, better natural surveillance during the day and night
- improved accessibility because services and facilities are more localised and can be reached by a variety of modes of transport
- reduced traffic and, thus, traffic-related problems, due to transfers to less environmentally damaging modes of transport, including public transport, walking and cycling
- reduced access to open space, due to open land being used for development
- more socially integrated neighbourhoods, more social cohesion and better social conditions generally because of increased numbers of people
- potential bad neighbour effects of mixed-use developments
- better public transport because of increased densities

### 4.4 National intensification policies with environmental objectives

N - national level

I - impact categories identified



#### 4.4.1 Environmental objectives

Environmental objectives are the main driving force behind intensification policies in the UK. As Table 4.3 shows, the objectives fall into three groups, continually stated in different ways throughout planning policy. First there is the key issue of reducing greenhouse gases and emissions (e.g. DoE, 1992a; DoE and DoT, 1994; HM Govt. 1994). This is the main objective of PPG13, and is repeated in many other policies. The specific aim is to meet the UK's targets for reducing greenhouse gas emissions and to improve air quality by reducing the need to travel by emission-inefficient modes: principally the car.

Second there are objectives related to protecting land as a resource (e.g. HM Govt, 1994; DoE, 1995b). These objectives include making the best use of urban land, protecting land in the countryside from development, minimising avoidable pressures on greenfield sites, keeping pressure off areas of environmental value, and protecting the countryside from encroachment. There is also a recognition in policy that existing built form is also an environmental resource, and that the character of the urban environment should, equally, be protected (e.g. DoE, 1992a). In particular, objectives centre around a desire to preserve urban character and townscape and

**Table 4.3 National intensification policies with environmental objectives**

<b>Policy</b>	<b>Source</b>	<b>Objective</b>	<b>Means of implementation</b>
<b>Britain's environmental strategy</b>	<b>This Common Inheritance: Britain's Environmental Strategy (HM Govt, 1990)</b>		
encourage the best use of land in urban areas (S.31, 8.6)	This Common Inheritance: Britain's Environmental Strategy (1990)	to keep pressure off other areas of environmental value and to improve local conditions (S.31, 8.6)	by using urban policies to encourage regeneration (6.10)
<b>Housing policy</b>	<b>Our Future Homes: Opportunity, Choice, Responsibility (HM Govt, 1995)</b>		
encourage people to live in existing towns, cities and villages (p.46)	Our Future Homes: Opportunity, Choice, Responsibility (1995)	to meet the increasing demand for homes in an environmentally sustainable way (p.46); to make the best use of existing infrastructure and reduce the need to travel (p.46)	by using the planning system and public investment (p.47)
ensure that half of all new housing is built on re-used sites (p.47)	Our Future Homes: Opportunity, Choice, Responsibility (1995)	to meet the increasing demand for homes in an environmentally sustainable way (p.46)	by using the planning system and public investment (p.47)
encourage a mix of uses in urban areas (p.47)	Our Future Homes: Opportunity, Choice, Responsibility (1995)	to help reduce travel (p.47)	by overcoming obstacles to mixed-use development (guidance commissioned by government) (p.47)
<b>UK's strategy on sustainable development</b>	<b>Sustainable Development: the UK Strategy (HM Govt, 1994)</b>		
shape new development patterns in a way that minimises the use of energy consumed in travel between dispersed development (p.158)	Sustainable Development: the UK Strategy (1994)	to meet the aims of sustainability in terms of reducing greenhouse gases (p.158)	by using the land use planning system and incorporating environmental constraints, backed by controls over development (p.158)
develop housing on urban sites, bring derelict land back into use, convert existing buildings (p.159)	Sustainable Development: the UK Strategy (1994)	to meet demand for new housing in a sustainable way (p.159)	by using the land use planning system and incorporating environmental constraints, backed by controls over development (p.158)

encourage urban growth in more compact urban areas, but balance with the need to conserve quality of life (p.161)	Sustainable Development: the UK Strategy (1994)	to ensure the most sustainable settlement form - compact urban forms enable lower energy consumption through efficient technologies and reduce the need to travel; larger towns can develop the critical mass that enables them to offer a variety of services and facilities, thus reducing the need to travel (p.161)	by ensuring elements of quality of life are considered in planning decisions, e.g. careful design, open space provision, availability of services, mix of uses (p.161)
contaminated urban land should be brought back into beneficial use (p.163)	Sustainable Development: the UK Strategy (1994)	to minimise avoidable pressures on greenfield sites (p.163)	the government review of how best to tackle derelict land is awaited (p.163)
<b>Housing location (discussion document)</b>			
ensure that as many as possible of future homes are built in existing urban areas (p.18)	<b>Household Growth: Where Shall We Live? (HM Govt, 1996)</b> Household Growth: Where Shall We Live? (1996)	to protect the countryside and encourage urban regeneration (p.19)	through the planning system, via PPGs (p.21, p.23); by using any of the governments programme of measures such as the Single Regeneration Budget, English Partnerships, Urban Development Corporations, European Regional Development Funds (p.26)
reuse vacant land and increase density whilst maintaining and improving the quality of the urban environment (p.27)	Household Growth: Where Shall We Live? (1996)	to make the best use of existing urban areas (p.27)	by supporting schemes i) to encourage people not to live in homes which are too large for their needs in the social rented sector ii) encourage mixed-use development and iii) encourage provision of smaller housing units to accommodate one and two person households (p.28)
bring empty housing back into use and make better use of the occupied stock (p.27)	Household Growth: Where Shall We Live? (1996)	to make the best use of existing urban areas (p.27)	by fostering joint working between LPAs, housing associations and the private sector to bring empty properties back into use, and by supporting the Empty Homes Agency to get buildings back into use through renovation grants (p.27)
<b>Green belts</b>			
<b>PPG2: Green Belts (DoE, 1988; revised, 1995)</b>			

Preserve the green belt (1988, 1995)	PPG2: Green Belts (revised) 1995	to check unrestricted sprawl of large built-up areas (1.5, 1995; 4, 1988); to assist in safeguarding the countryside from encroachment (1.5, 1995; 4, 1988)	by establishing green belts in development plans (2.2, 1995; 8, 1988) and maintaining a presumption against inappropriate development within them (3.1.3.2, 1995; 12, 1988)
<b>Housing</b>			
<b>PPG3: Housing (DoE, 1988, revised, 1992)</b>			
develop housing in existing urban areas (2, 1992)	PPG3: Housing (revised) 1992	to relieve pressure for development in the countryside and maintain existing conservation policies (2, 15, 1992)	by identifying sites in development plans in existing urban areas suitable for new housing and redevelopment and using the development control process to guide housing accordingly (12, 1992)
avoid town cramming and protect the character of existing residential areas (20, 1992)	PPG3: Housing (revised) 1992	to protect environmental character of existing residential areas (23, 1995)	by including density and other policies in Local Plans for the areas concerned and implement through development control (23, 1995)
where appropriate allow new homes to be developed in large back gardens in urban and suburban areas (26, 1992)	PPG3: Housing (revised) 1992	to meet the needs for new homes in existing residential areas (23, 1995)	by including density and other policies in Local Plans for the areas concerned and implement through development control (23, 1995)
achieve a reasonable balance between the need to make adequate provision for development, and the need to protect open land from development (27, 1995)	PPG3: Housing (revised) 1992	to protect land for nature conservation purposes	through usual planning procedures
<b>Industrial and commercial development and small firms</b>			
<b>PPG4: Industrial and Commercial Development and Small Firms (DoE, 1994)</b>			
encourage new development in locations which minimise the length and number of trips, especially by motor vehicle, and in locations that can be served by more energy-efficient modes of transport (10, 1994)	PPG4: Industrial and Commercial Development and Small Firms 1994	to control the emission of greenhouse gases which lead to global warming (11, 1994)	by identifying suitable sites in development plans (perhaps in consultation with British Railways Property Board or Port Authorities) and use development control system to implement (10, 11, 1994) - LPAs and statutory undertakers should also release under-used or vacant sites from their own land holdings, and LPAs should encourage other landowners to review their land holdings with the aim of releasing sites for development (23, 1994)

encourage mixed-uses (15, 17, 18, 1994)	PPG4: Industrial and Commercial Development and Small Firms 1994	to meet aims of sustainability; trip-reduction (10, 1994)	by permitting planning permissions which contribute to mixed-use, except where there are significant and specific objections, e.g. noise, smell, safety etc. (15, 1994)
encourage full use of existing buildings: resist allowing them to stand wholly or partly empty (19, 1994)	PPG4: Industrial and Commercial Development and Small Firms 1994	to contribute to the preservation of the building, or the enhancement of the townscape (19, 1994)	by adopting a flexible attitude to uses to enable re-use or new uses to be instituted in underused space (19, 1994)
<b>Town centres and retail developments</b>			
focus development, especially retail development, in locations which maximise the opportunity to use means of transport other than the car (1.1, 1996; 11, 38, 1993)	PPG6: Town Centres and Retail Developments (DoE, revised, 1993; revised, 1996)	to promote sustainable development (1.2, 1996) by making it easier to provide good public transport (2.26, 1996) and to enable one car journey to serve several purposes (2.26, 1996; 11, 38, 1993)	L.PAs should take a positive approach to retail development, in partnership with the private sector and identify sites in development plans using a sequential approach (1.8-1.17, 1996). They should also consider traffic congestion and generation when drawing up local plans (12, 1993) or develop traffic management strategies that take an integrated approach to transport in town centres (1.9, 2.29, 1996), and provide good access to the town centre for all means of transport, this includes improving the pedestrian and cyclist environment (1.9, 2.29, 1996, 12, 1993). Planning obligations can be used to secure developer contributions to new or improved public transport or improved pedestrian access (4.6, 1996).
allow major new retail developments only under specific circumstances (4.12, 1996; 27, 1993)	PPG6: Town Centres and Retail Developments (revised) 1993 (revised, 1996)	to minimise environmental impacts (4.13, 1996); to not add to total traffic and to ensure that the location does not result in an unacceptable increase in CO2 and other polluting emissions (4.13, 1996; 27, 31, 1993)	by undertaking impact assessments and applying a sequential approach to site selection (4.14, 4.13, 1996)
<b>Development plans and regional guidance, local plans</b>			
	PPG12: Local Plans (DoE, 1988) PPG12: Development Plans and Regional Planning Guidance (DoE, 1992)		

<p>ensure that, in development plans, redundant, derelict or underused sites are used for development in preference to greenfield sites wherever possible (5.2, 1992)</p>	<p>PPG12: Development Plans and Regional Planning Guidance, 1992</p>	<p>to make efficient use of the limited resource of land (5.2, 1992)</p>	<p>the development plan should ensure that such sites are used (5.2, 1992)</p>
<p>in development plans, guide new development to locations which reduce the need for car journeys and the distances driven, or which permit the choice of more energy-efficient public transport, and pursue policies that encourage the use of public transport in identifying areas for new or intensified development (6.14, 1992)</p>	<p>PPG12: Development Plans and Regional Planning Guidance, 1992</p>	<p>to reduce CO2 emissions (6.14, 1992)</p>	<p>L.P.As should consider the following points in reaching an overall view on policies in the development plan. Development should: make full and effective use of land in existing urban areas without amounting to town cramming, be closely related to public transport networks, be located at public transport nodes and town centres if it is likely to attract trips. Housing should be located so it minimises car use, town centre car parking should be limited, interchange opportunities between major public transport networks should be considered and facilities which assist walking and cycling encouraged (6.14, 1992)</p>
<p>promote energy-efficiency in development plans (6.16, 1992)</p>	<p>PPG12: Development Plans and Regional Planning Guidance, 1992</p>	<p>to meet the aims of sustainability (1.16, 1992)</p>	<p>development plans should give consideration to their influence on combined heat and power schemes, district heating networks, housing type, location and orientation (6.16, 1992)</p>
<p>in development plans, develop policies which aim to reclaim contaminated and derelict land, thus reducing pressure on greenfield sites (6.18)</p>	<p>PPG12: Development Plans and Regional Planning Guidance, 1992</p>	<p>to improve the physical environment (6.18, 1992)</p>	<p>by taking account of environmental implications of development in development plans and allocating land accordingly (6.17, 1992)</p>
<p><b>Transport</b>  <b>PPG13: Transport (DoE and DoT, 1994) (1988 no policies encouraging intensification)</b></p>			

reduce the need to travel, especially by car (1.7, 1994) PPG13: Transport, 1994

to meet objectives for greenhouse gas emissions, air quality and for the protection of landscapes and habitats (1.1, 1994)

Development plans should: influence the location of different types of development relative to transport provision and foster forms of development which encourage walking, cycling and public transport use. LPAs should adopt land use policies to: promote development within urban locations, locate major generators of travel demand in existing centres, strengthen existing local centres, maintain and improve choice for people to walk, cycle or use public transport rather than drive, limit parking provision (1.8, 1994). They should also consider the impacts of travel demand on all new development before planning permission is granted (2.12, 1994). Regional Planning Guidance, structure plans and local plans should: examine the relationships between transport and land use at different levels, promote their integration and co-ordination and promote strategies that reduce the need to travel (2.1, 1994).

Housing: the maximum of housing should be allocated to existing larger urban areas, with a particular emphasis on the re-use or conversion of existing sites or properties, and locations well served by public transport. Vacant, derelict or underused land is a priority location. Conversion, improvement and development are also preferred. Higher density residential development should be located near public transport nodes, or alongside corridors, well served by public transport and close to local facilities. Standards should be set to maintain existing densities and where appropriate increase them. Adequate housing land should be released to encourage mixed-use development (3.3, 1994). Employment, retail, leisure, tourism and recreation, education and other public facilities should, where possible, all be located in existing urban centres, well served by public transport (33, 1994)



achieve a reasonable balance between the need to make adequate provision for development in urban areas and the need to protect open space from development (27, 1991)

PPG17: Sport and Recreation, 1991

to retain or enhance the character of historic landscapes and conservation areas, and retain open spaces for the future (25, 1991)

by designating urban open space of different types on the proposals map and in the policies of the local plan and taking account, in development control decisions, of the impact of a reduction in open space, and whether it is to be replaced with similar community benefit (27, 1991)

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**Tourism**

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**PPG21: Tourism 1992**

develop derelict sites and redundant buildings for tourist uses (4.14, 1992)

PPG21: Tourism 1992

to bring about environmental improvements (4.14, 1992)

by considering tourism options for derelict land and redundant buildings when developing Local Plans (4.14, 1992)

to protect land of nature conservation value in towns and cities, to retain or enhance their character for the future.

The third group of objectives relates to the opportunities for higher density developments to facilitate efficient technologies such as combined heat and power and district heating systems. The objectives of such policies is to ensure that in appropriate places development is of a sufficient density to make such schemes viable.

### 4.4.2 Environmental policies

Policies to complement the objective of reducing total energy use encourage development in locations which minimise the length and number of trips, especially by motor vehicle, and in locations which can be served by more energy-efficient modes of transport than the car (e.g. DoE and DoT, 1994). In development plans, LPAs are urged to form policies which guide new development to locations which reduce the need for car journeys, or permit the choice of more emissions-efficient transport modes. Concurrently they are urged to pursue separate policies to encourage the use of public transport, promote energy-efficiency in local plans and make better use of the existing housing stock and existing buildings to make the most of the existing transport infrastructure.

Central government policies designed to make the best use of urban land suggest encouraging development into urban areas, especially on derelict or vacant land, but also restricting development elsewhere (e.g. DoE, 1996b). LPAs are urged to devise policies which concentrate retail and employment uses on existing urban land, and the aim of ensuring at least half of all new development is on re-used sites (HM Govt, 1995) is intended to bring contaminated and derelict land back into use, perhaps to meet housing need, or for employment or tourist uses (DoE, 1992c).

However, at all times these policies are accompanied by warnings about the need to conserve the quality of life or improve the quality of the urban environment (e.g. DoE, 1992a). Specifically, there are warnings against town cramming, and stresses on the importance attached to protecting the character of residential areas and maintaining an adequate amount of open land in urban areas, especially where it is highly accessible to the local population (*op cit.*). Policy objectives of encouraging new technologies are stated infrequently, and simply suggest that higher densities are preferable in enabling such technical advances as combined heat and power systems and district heating (HM Govt, 1995).

### 4.4.3 Critique of environmental policies

The environmental implications of intensification policies are extremely far-reaching. Issues of, for example, landscape, urban nature conservation, soil<sup>4</sup> and all other issues which impinge on

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<sup>4</sup>Urban soil is often more contaminated than that in the countryside, therefore there are implications for sustainability in treating contaminated soil (Royal Commission in Environmental Pollution, 1996).

urban ecosystems might be affected. This critique, as with those for economic and quality of life policies, concentrates on the main policy claims, but also draws on the wider key issues and arguments from literature.

**4.4.3.1 Does urban intensification reduce the need to travel?** - There is a long-running debate about the extent to which the density of urban form can contribute to reducing trips, or contribute to a shift between modes of travel (Banister, 1994; Breheny, 1995; Cervero, 1991; Clark *et al.*, 1994; Newman and Kenworthy, 1989; Owens, 1986b). There is also a large amount of material relating to what the impacts or costs of increasing densities, for the sake of reduced travel, may be (Breheny, 1995; Stretton, 1996; Troy, 1996). It is worth reviewing here, first, the arguments and the evidence which have prompted policy changes in the UK, to put so much emphasis on land use planning to reduce greenhouse gases and emissions; second, what the costs of such policies might be, and whether any other changes would be more appropriate to meet the desired reduction in greenhouse gases.

The interest in the relationship between urban form and travel patterns has a relatively long history. Work by Newman and Kenworthy (1989) is now seen to have been one of the most influential studies. Newman and Kenworthy mapped the correlation between urban densities and petrol consumption in 32 cities across the world. Their main finding was that there was an inverse correlation between the two factors. They found that average fuel consumption in American cities was nearly four times as high as in European cities and ten times higher than in Asian cities. After allowing for variations in the price of fuel, income and vehicle efficiency, only half of the difference was explained. Thus, Newman and Kenworthy suggested that using planning policies to re-urbanise, and to concentrate transport facilities is a major way of reducing fuel consumption. Although their work has been criticised, most notably by Gordon and Richardson (1989), it has been useful in stimulating debate, and has prompted a number of studies which concentrated on particular elements of the suggested relationship.

In the UK probably the most influential research on this subject came from planning consultants ECOTEC, who were commissioned by the DoE to explore the potential of reducing emissions through planning (ECOTEC, 1993). Their research also concluded that there was a relationship between density and trip frequencies and lengths. They found that lengths of journeys by car are relatively consistent at densities of over 15 persons per hectare, but at lower densities car journey lengths increase by up to 35%, and that 'as density increases the number of trips by car declines from 72% of all journeys to 51%' (*op cit.*, p.351). Thus, they concluded that 'Higher residential densities within settlements are likely to be associated with reductions in travel demand and the encouragement of shifts towards emissions-efficient modes' (*op cit.*, p.vii). Significantly though, they also stressed that the most important implications for planning included focusing development within urban areas, revitalising existing neighbourhoods, town and city centres and constraining development within the commuter belt.

This research was influential because it provided empirical evidence from the UK that increasing densities may be a way of reducing car use, and therefore greenhouse gases. Thus it influenced the new PPG13, which took on board the research's implications for planning policy (DoE and DoT, 1994). PPG13 represents the first attempt by the planning system to reduce the growth in the length and number of motorised journeys (Banister, 1994).

However, as stated above, many have questioned the real contribution which the measures advocated in PPG13 can make to reducing fuel emissions (Gomez Ibanez 1991; Gordon and Richardson, 1989; Breheny, 1995). The questioning comes essentially from two perspectives. First, that the arguments and the evidence which have prompted the policy changes the UK may be flawed, or at least too simplistic, and second that other changes may be more appropriate to meet the desired reduction in greenhouse gases.

Those who question the basic assumption that increasing densities will actually bring about reductions in greenhouse gases focus their arguments on the actual savings to be made by attempting to restructure urban form. Breheny argues that even if all settlements in the UK could be modelled to be like the most fuel-efficient areas, only a 30% reduction could be made in fuel (Breheny, 1995). Such radical re-urbanising is probably unrealistic for most cities, so the best that could feasibly be achieved is likely to be a 10% saving. Furthermore, this does not take into consideration increases in car ownership, which seem inevitable without any other prohibitive measures (*op cit.*). Stretton (1996) makes a similar argument, stressing that in Australia about 10% of the country's energy use fuels urban car travel, and that even if that could be halved, only a 5% saving could be made. Then there would need to be an increase in fuel for public transport, so the savings might be 3%. This figure, he argues, could be saved by the introduction of fuel-efficient measures which, according to Rooney (1993), are already technically available.

Other commentators argue that the concentration, in compact city policies, on the centralisation of activities is misplaced, and that changes in travel patterns make urban intensification policies irrelevant. In particular, the specialisation of services, and the increase in suburb-to-suburb commuting is significant (Levinson and Kumar, 1994; Spence and Frost 1995; Gordon and Richardson, 1989). Moreover, some believe that regional travel patterns should be the focus of truly sustainable patterns of development, as this is the scope of many leisure and business related journeys (Handy, 1992; Banister, 1994).

Yet other researchers have turned their attention to the relevance of other aspects of urban form to explain differences in travel patterns. ECOTEC (1993) concluded that there may be a relationship between urban size and travel patterns, stating that larger urban areas are more likely to have benefits in terms of sustainability than smaller urban areas, whereas, Owens (1991) and Barton (1992) favour decentralised concentration, whereby subcentres are developed while overall urban densities are maintained (Breheny, 1995).

As stated above, there is also a number of writers who question the relevance of attempting to restructure urban form when alternative measures, such as advances in fuel technology, or fiscal measures to deter car use, may prove equally or more effective (Farthing *et al.*, 1996; Stretton, 1996). Owens (1991), for example, believes that transport policies should concentrate more directly on managing demand. Farthing *et al.* (1996) concur, and suggest that changes will not occur until the indirect costs of private travel are more equitably distributed, perhaps by increased taxation.

Altogether, the relationship between urban form and travel patterns is complex. Great advances have been made in understanding the factors which affect travel patterns and choices, however there are some matters which still require further investigation. Overall though, the consensus which emerges from research is that density does have a part to play in reducing demand for energy-rich modes of transport, but that there are many other issues which need to be considered too - issues such as public transport provision, road pricing, and fuel-efficient technologies are all important. PPG13 acknowledges this, when it states that:

The number of new developments each year is relatively small but the development patterns we set today will endure into the next century. If land use policies permit dispersal of development and a high reliance on the car, other policies to reduce the environmental impacts of transport may be less effective. (DoE and DoT, 1994, 1.10)

If a land use policy is to be prescribed, then a pattern of decentralised concentration appears to be the most sustainable (Breheny, 1995; Jenks *et al.*, 1996). Owens (1991), suggests that appropriate planning policies would include 'discouragement of dispersed, low density residential areas or any significant development heavily dependant on car use; so a degree of concentration, through not necessarily *centralisation* of activities ... ' (*op cit.*, p.30).

**4.4.3.2 Does urban intensification represent the most sustainable use of land?** - There is an obvious environmental dilemma in advocating the development of land in urban areas in order to meet sustainability objectives, such as trip-reduction and protection of land within the countryside. It is a dilemma which is related to the contradiction of the scale of the problem and its solution, mentioned in Chapter One. Strategic aims to protect the countryside are being carried at the local level, which means the loss of undeveloped land within urban areas. Many commentators have argued that this implies that, in policy terms, land in the city is less environmentally important than that in the countryside (Phoenix Group, 1989; Hoyles, 1994). This is not strictly true. A careful reading of national policies shows their eagerness to advocate development only on land which is not of significant ecological or amenity value. Thus, policies advocate the reuse of derelict land, contaminated land and unused infill sites. However, it is increasingly the case that, in the most prosperous areas, developers are interpreting the policies to mean that any undeveloped piece of land in a town or city is a potential development site, and certainly, over the last decade many much-loved playing fields, informal play areas and gardens have been built on (Bell, 1995).

Therefore the logistics of the dual aims of improving the environmental quality of both the city and the countryside simultaneously should be recognised. However, most of those in favour of intensification fail to do this (Breheny, 1992a). For example, the CEC argues that higher densities lead to more sustainable patterns of development, but also argues that areas of abandoned and semi-natural habitats should be protected because they 'have often proved to be surprisingly rich in their variety and abundance of wildlife.' (CEC, 1990, p.38). Similarly it argues that 'While in absolute terms such sites may not always have a wildlife value comparable to that of a truly natural habitat, their location in or close to urban population centres gives them a special value and relevance' (*op cit.*, p.38).

A more fundamental criticism, however, comes from those who argue not that the policies are contradictory at different levels, but that they are simply wrong, and that the more intensive use of land may be unsustainable for a number of reasons (Knight, 1995; Troy, 1996). Troy (1996) proposes that primarily low density offers people more space in which to produce their own food, manage their household waste, and live in a more personalised sustainable way. He argues that any increases in travelling which may be needed to accommodate this lifestyle could be discounted by advances in fuel technology over the next decade and, in any case, can be offset by savings in home energy consumption, due to better opportunities for solar heating. Also, the increased numbers of people in towns and cities mean that their impact, in terms of environmental wear and tear, on existing open spaces is detrimental. These localised losses could have a negative effect on urban wildlife, lead to more dirty and polluted cities and mean that urban residents have to travel out of town to enjoy open green spaces.

However, these arguments are relatively rare within the intensification debate. Most believe that there are some contributions to be made to sustainability through the continued development of urban land. For example, developing derelict land in cities can lead to an upgrading effect on the built environment. But, again, the question of balance and good management is crucial, and attention has now turned, in many areas, to managing development so that it does not denigrate the existing character of towns and cities. The London Boroughs Association, for example, published a report which aims to help local authorities assess the amenity and wildlife value of open land and thus prioritise it for development (Bell, 1995). Similarly, Groundwork (an organisation which uses derelict land for beneficial purposes) published a report which validated their work by showing that in some cities 75% of the population said that derelict land has a detrimental effect on their environment, and thus they would like to see it redeveloped (Fyson, 1995). Thus the important issue appears to be to distinguish between land which is seen as underused or derelict, and that which has some community or ecological value (Cregan, 1988).

**4.4.3.3 Does urban intensification facilitate energy-efficient technologies?** - The main claims in policy are that higher density developments can facilitate energy-efficient technologies, such as the use of district heating and combined heat and power schemes (HM

Govt, 1995), which can be up to two and a half times more energy-efficient than traditional fossil fuel (McLaren, 1992; Hutchinson, 1992). This relationship is not disputed. Higher densities allow lower rates of domestic consumption of energy for heating and water because of increased insulation due to building concentrations (Agnotti, 1993). However, they also may require more energy in order to function properly, for example, high densities may require the use of lifts, or use more energy to construct (Haughton and Hunter, 1994; Rydin, 1992). High densities may also prohibit the use of some energy-saving technologies such as solar gain, which is more effective on large flat roofs, and more personalised recycling facilities such as water run-off recycling, composting and so on (Stretton, 1996).

#### 4.4.4 Conclusions on the environmental implications of urban intensification

The environmental claims which are driving intensification policies are strong. The desire to reduce car use and shift to more sustainable modes of transport are clearly spelled out in policy, as are the benefits to the countryside, and also cities, in terms of environmental protection - the countryside protected from development and cities regenerated and upgraded with new buildings on derelict land. However, it is clear from the review that meeting all of these objectives is dependant on a number of conditions. Furthermore, it seems that assumptions about the impacts of these policies are not included in policies. Therefore, in the case studies, evidence about the following apparent impacts will be sought:

- reduced number and length of trips by modes of transport which are harmful to the environment, primarily the private car, and increases in other modes - walking, cycling and public transport
- protection of the countryside and valuable rural land and green belt
- loss of greenery in towns, including trees, shrubs and greenery in private gardens
- loss of ecologically important open space and habitats in towns due to more intensive development
- improvements in air quality caused by trip reductions
- more opportunities for CHP due to higher housing densities
- positive effect of the local built and natural environment brought about by upgrading due to new buildings and high quality design
- environmental wear and tear

#### 4.5 Conclusion

The review of policy content, or substance, has revealed that, behind the policy aims are a myriad of conflicting arguments, claims, counterclaims and assumptions. In each of the three interest categories, almost all the assumptions in the policy documents are either contested by research, or outweighed by arguments about possible side-effects. The challenge now is to see how these theories relate to the findings of the case studies.

# **Chapter Five: Implementing urban intensification policies**



## Chapter Five: Implementing urban intensification policies

### 5.1 Introduction

This chapter presents the contextual information needed to undertake the implementation study, and hence answer the second research question: can the land use planning system implement intensification policies? In order to answer this question, it is essential to understand how the aims of urban intensification policies ideally should be incorporated into the planning system, and how the policies should be turned into decisions and subsequently patterns of development. By setting out such a normative or rational model of policy implementation, any divergence's from it can be identified and investigated in the case studies.

However, as with the previous chapter, it is important to set the presentation of a rational model in the context of the current debate on implementation. This is necessary to identify and prioritise potential issues to investigate further in the case studies. The presentation of the contradictions apparent in implementation in Chapter One highlighted a number of factors which impinge on successful implementation of compact city policies. These contradictions were evident in matters external to the planning system, such as market trends and cultural preferences for suburban housing, but also from those within it, such as the decision-making process and internal organisational structures which impeded co-ordinated or strategic planning.

This chapter reviews some of these matters in more detail. In particular, it concentrates on those related to the structure and processes of the planning system. However, it also comments, where appropriate, on external constraints, and these are investigated further in the case studies. This critique is not comprehensive, as it is beyond the scope of this research to investigate the numerous influences on the planning system. But it does show the main concerns from literature and research on implementation relating to intensification, and therefore gives an indication of some of the most important areas to investigate during the implementation case studies. It does not, however, preclude new issues from coming to light during the case studies.

The chapter begins with a presentation of a rational model of how intensification policies should, ideally, be translated into development on the ground. Although this process has been referred to throughout this research, it is useful to present it here as a point of reference for the implementation study. The presentation of this rational model shows that there are two important stages in implementation. The first is the transmission of national policies through the various tiers of planning, and the second is how and whether these policies are taken into account, and acted upon, during the development control process. These two stages structure the review of literature relating to implementation which follows.

First, the progress of policy into plans is considered. A review is undertaken of research which looks at whether intensification policies are incorporated into development plans at the local level. This is used to illuminate potential problems to be followed up in the case studies. The second part of the review looks at studies on the development control process which focus on how policies are used, and on what factors might be important in ensuring policy success or failure. Again, this provides a valuable set of references for the case studies.

Finally, attention turns briefly to a critique of the planning system as a whole as a system for delivering intensification policies. Some interesting arguments came to light during the literature review about possible changes in the planning system, its operations, structures, or legal status, which may need to be made if many of the aims of urban sustainability are to be implemented successfully. These arguments are included as they are interesting directions to pursue with those attempting to implement intensification policies in the case study boroughs, and might make a positive contribution to the implementation study.

### **5.2 The incorporation of intensification policies into the planning system**

#### **5.2.1 Introduction to the planning system - a rational model**

The British planning system is characterised by a fairly rigid procedural structure, which has remained largely unchanged since the beginning of modern planning. This structure, however, is relatively open to the inclusion of new policy issues and changes in policy substance. In fact, many have likened the system to an empty vessel - a procedural device - to be filled with whatever content is deemed important by politicians, officials and pressure groups at any given time (Healey, 1992; Underwood, 1981). The system consists of a hierarchical set of plans which provide guidance for local decision-makers, whose judgements are discretionary. Central government retains power by its ability to review plans and individual decisions through appeals procedures (Healey, 1992). Local councillors and officers make the majority of decisions, and therefore have been argued to have a sizeable amount of discretionary power and flexibility (Underwood, 1981).

However, recently commentators have begun to question whether the system itself is robust enough to incorporate some of the more radical changes needed to bring about sustainable development, including urban intensification. There are concerns that the new 'substance' of planning cannot be fitted into the existing procedural framework. For example, Healey asks whether the system can be '... adapted to the concerns of the 1990s, or are there problems in the *structure* of the system which make it anachronistic to contemporary conditions?' (Healey, 1992, p.412)<sup>1</sup>. In order to begin to investigate this issue, a more detailed understanding of the administrative framework of the planning system and how it operates is needed. This is presented below.

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<sup>1</sup>See also Healey (1997).

### 5.2.2 Development plans

The main legislation guiding today's planning system is contained in the Town and Country Planning Act 1990, as amended by the Planning and Compensation Act 1991. The purpose and basis of the planning system are outlined in *Planning Policy Guidance Note 1: General Policy and Principles* (DoE, 1988f; 1992e; 1997, cover the study period) and *PPG12* gives advice on *Development Plans and Regional Planning Guidance* (DoE, 1988d and 1992d cover the study period). These documents, together, clarify how plans should be developed and used in the UK.

The top tier of policy making in the UK is the DETR (previously the DoE). This is headed by the Secretary of State, who is responsible for planning in England. Fig. 5.1 shows the levels of town and country planning. It is the DETR's job to prioritise planning issues of national, and international importance and set out policies for regional and local plans to incorporate. Since 1988 national policy has been expressed in PPGs, and these are replacing the Circulars used previously (DoE, 1992d). PPGs give advice on the 'general aims of the planning system, the content and methods of preparing development plans, and on specific policy topics' (DoE, 1996a, p.117). PPGs also contain advice on how to implement some of their guidance, for example they give advice on using derelict land grants, town centre management strategies and traffic management schemes. These mechanisms, which are not part of the usual development control process, are the 'special incentives and controls' outlined in the ABS.

The overall aim of PPGs is to ensure consistency of approach to local decisions by setting out clearly the government's policy priorities, and how they are to be applied (DoE, 1992d, para.1.5). Whilst PPGs have no formal legal status, the courts have held that they are 'material considerations which must be taken into account, where relevant, in decisions on planning applications' (DoE, 1992e, para.20). The same status is afforded to White Papers which, as shown in Chapter Four, also contain statements of policy by central government. As indicated in Chapter Two, the DoE incorporated principles of sustainable development into a number of PPGs (DoE, 1992d). Chapter Four showed that, in terms of location of development, the main thrust of PPGs currently is to encourage urban intensification.

The next level of planning is the regional tier. Regional planning issues are dealt with by integrated regional offices of the DETR. Guidance is produced after considerable consultation with county councils, representatives of local authorities, interest groups, developers, other government departments and members of the public (DoE, 1992d). Since 1988, the DoE issued Regional Planning Guidance for each of the eight English regions, and this guidance should, by law, be taken into consideration in the production of development plans by local authorities. PPG12 describes regional guidance as setting 'broad strategic policies for land use and development where there are issues which, though not of national scope, apply across regions or parts of regions and need to be considered on a scale wider than the area of a single authority' (DoE, 1992d, para.1.6). Such issues include the identification of 'the scale and distribution of provision for new housing to be made in development plans over a 15 year

**Fig. 5.1 The levels of town and country planning (simplified)**

Source: Greed, 1996a, p.22, updated

**European Commission**

Directorates-General

**Central Government**

Department of the Environment, Transport and the Regions

*Secretary of state* (politician, MP)

Approves development plans

Gives overall policy guidance

Deals with appeals (assisted by the  
planning inspectorate)

advised by planning professionals

(civil servants)

*Also* Range of other central government departments liaise with DETR on planning issues, e.g. Ministry of Defence, Home Office, Industry.

**Regional level**

*Note* No significant regional level at present but vestiges of Regional Economic Planning Boards, committees, plans, e.g. SERPLAN. Growing emphasis on regional liaison by development plan authorities, and with Europe.

**Local Government**

Decisions are made by the politicians (elected councillors on council planning committee) as advised by the professionals (planners who are employed as local government officers). Following recent changes, two types of development plan system both running:

**Two-tier system**

*Counties*

Structure Plans

Overall policy strategy

Minerals and waste disposal

*Districts*

Local Plans

Implementation of planning

Development control (outline and  
detailed applications)

**Unitary system**

*Metropolitan districts and*

*London boroughs*

Unitary Development Plans

(combine contents of structure  
and local plans)

Policy implementation

Development control

New and reconstituted authorities

in some shire counties and

provincial cities

**Also range of *ad hoc* bodies, initiatives and plans, including:**

Urban Development Corporations, City Challenge initiatives, Single Regeneration Budget programmes, various nominated, consultative bodies

period...' (*op cit.*, para 1.6). The government has also issued strategic planning guidance for London and the metropolitan areas which has the same status as regional guidance but is more detailed (DoE, 1996a, p.117)<sup>2</sup>. Again, regional guidance and strategic planning guidance for London support the idea of intensification.

The third tier in the planning system is that of local government. The Town and Country Planning Act 1990 (as amended) requires that every local planning authority in England and Wales should prepare a development plan. These plans take several forms, depending on the type of local authority area. Structure Plans are prepared by county councils, and set out the strategic policy framework for local planning by district councils (DoE, 1992d, para.1.4). District councils and National Park authorities set out their policies in Local Plans. Unitary Development Plans (UDPs), which include the functions of both the structure and local plans, are produced by metropolitan districts and London boroughs. UDPs are split into two parts. Part I is similar to the structure plans, produced in non-metropolitan areas, and contains broad objectives and strategies, and Part II contains more detailed objectives and policies and also a proposals map, showing land designations, transport routes and the like (DoE, 1992d). UDP Part IIs and local plans should also contain development control policies, setting out detailed criteria, such as densities and minimum and maximum distances between developments. The 1990 Act (as amended) states that local authorities must, when preparing their local development plans 'have regard' to national policies. Therefore, all development plans produced since the early 1990s should include policies which favour urban intensification.

LPAs can also prepare supplementary planning guidance on particular issues which are of interest in their locality. These should be in accordance with the plan, and clarify issues, or present them in more detail, for example with illustrations, or by setting out standards. This supplementary guidance does not have the same status as the plan, as it has not been through the same consultation procedures. However, it can be taken into account as a material consideration (DoE, 1992d). Density and layout standards are often included in supplementary guidance.

PPG12 (DoE, 1992d) also states that LPAs have a duty to monitor progress on their local plan policies. Thus they are recommended to design plans to facilitate easy evaluation. PPG12 suggests a sequence of straightforward aims, objectives and targets, so that reaching judgements can be made easier. It suggests that in this way, 'local authorities will have a clear framework for measuring progress in implementing their plans and in reviewing their plans when that becomes necessary' (DoE, 1992e, para.4.24). Thus LPAs' provisions for this type of monitoring should benefit policy evaluation in this study.

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<sup>2</sup> This is being replaced by regional planning guidance in all the metropolitan areas, with the exception of London.

As shown in Chapter Two, these plans form the most important component of the planning system in the 1990s. The new plan-led era has elevated their importance, so that now all development control decisions have to accord with development plans unless material considerations indicate otherwise. With this system in place, intensification policies should be finding their way into development plans, and thus be considered at every application in the development control process. A brief look at the development control process will clarify exactly how the plans should be used.

### 5.2.3 Development control

Development control decisions are made at the local level by elected councillors. These are representatives of districts and counties, who usually serve for four years. The process whereby decisions are made is as follows<sup>3</sup>. First, proposals for development requiring planning permission are submitted to the planning department of the relevant planning authority, generally a district or borough council, by the prospective developer. The application is then recorded in a public register and publicised, so that third parties may make representations to their local councillors and officers. The planning department then consults the relevant agencies, such as the highways department of the county council, to assess any policy implications of the proposal, and seek expert advice on technical matters.

The planning officer then prepares a report on the application. This report should be made with reference to the relevant development plans and any subsequent national guidance that post-dates the development plan. The officer also consults other interested parties and takes into consideration any representations he or she receives. He or she may liaise further with the applicant at this stage, to clarify any issues or advise on changes which may ease the progress of the application. The officer then makes recommendations for the planning committee, based on this report, either to permit the application, with or without conditions, or refuse it. The planning committee of elected councillors then makes its decision (unless it has been delegated to officers). The decision will normally be made within eight weeks and should be made strictly on planning policy issues. The applicants have a right of appeal if the decision is not made within the eight week period, or if they disagree, on planning grounds, with the decision (DoE, 1996a). By following this system, every application should be made in line with the local plan and national and regional guidance.

### 5.3 Critique of the rational model

In presenting this model of how intensification policies should be incorporated into the planning system, several distinct issues in implementation arise. First, there is the question of whether central government's intensification policies are being translated into development plan policies at the local level. Are the messages about intensification embodied in PPGs and other national and regional guidance making their way into local plans? Second, there is the question of whether the policies are considered and acted upon in the development control

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<sup>3</sup>This section is summarised from DoE (1996a).

process. Do planning officers use urban intensification arguments when making their case to councillors, and are these arguments understood and acted upon? The next section reviews research which sheds some light on these issues, and highlights areas to be investigated during the case studies.

### **5.3.1 Are intensification policies being incorporated into development plans, and if not why not?**

If central government's urban intensification policies are to have any effect then they must be incorporated into local development plans. It is therefore important to examine whether or not they are being brought into the latest round of development plan preparation. There is a slight difficulty in assessing this, as there are considerable time lags in plan adoption, and many of the most important intensification policies have been relatively recent. However, the thrust towards urban compaction has been relatively strong since the late 1980s (see Chapter Two) and therefore there should be some evidence now of these policies being formally adopted. In order to assess this, a review was undertaken of four recent pieces of research which looked at implementing aspects of urban intensification policies. The research investigated implementation of urban intensification policies (DETR, forthcoming), density standards (Breheeny, 1997), PPG13 policies (Breheeny *et al.*, 1996) and sustainability policies (CPRE, in Winter, 1994). The review concentrates on issues of policy progress, and barriers to inclusion of central policies in development plans.

Research into urban intensification (DETR, forthcoming) looked at LPAs' attitudes to the process, and their policy stances. Part of the research was a survey of all LPAs in England, Scotland and Wales. The timing of this research was problematic, in that it referred to local plan policies between 1981 and 1991, so any changes in policies to conform with national guidance might have come later. However, there was, by the time the survey was undertaken, a growing move towards intensification, and LPAs were asked to report on their current approaches and practices. Furthermore, the local case studies were undertaken in 1995 and these gave an opportunity to look at issues of policy development in more detail.

Altogether, 52% of the LPAs which responded to the national survey said that their authorities were encouraging urban intensification, 41% were neutral and 7% were discouraging it. Interestingly, however, on further analysis the survey showed that the places which were encouraging intensification were the places where it was happening least, whilst the places that were discouraging it were the places where it was happening most. In the areas which were not encouraging intensification, problems of local acceptability and the perceived conflicts with local environmental protection were cited as barriers to inclusion.

A second major research project looked at whether LPAs were revising their residential density standards in the light of government advice to increase them (Breheeny, 1997). Again, part of the research took the form of a national survey, this time of all 385 English district councils and

London boroughs, asking about the incorporation of density standards into local plans in line with PPG13 and the prevailing government advice for higher densities.

This research found that central policies were not making it through to local development plans, and that 'Far from being keen to promote higher densities, local authorities are often resisting further intensification and are using density standards to do so' (*op cit.*, p.85). The research also investigated whether density standards were being raised due to the new environmental agenda, and concluded that 'There is little evidence ... to suggest that the environmental imperative is having much effect on raising density standards' (*op cit.*, p.86). In fact, only 13 authorities had raised their density standards in response to PPG13.

The LPAs were also asked if they foresaw any problems in raising their density standards. The majority of respondents did, mainly on the grounds of loss of amenity or quality in existing residential areas. Again, the conclusion was that these fears originate from local residents and local politicians. Overall, the conclusions of the research were that:

Where qualitative evidence on standards exists, it shows no discernible trends to higher standards. The qualitative evidence shows a remarkable lack of interest in PPG13 - given that it is very much the Government's flagship guidance on planning for sustainable development - and a tendency for density policies to be used to protect the status quo rather than to promote change. (Breheny, 1997, p.87)

The DoE also commissioned research specifically into the progress of PPG13 type policies (Breheny *et al.*, 1996). Again, the timing of the research meant that there was little chance of finding specific PPG13 policies in development plans, but the researchers surveyed LPAs to see what progress they were making. They found that LPAs were aware of PPG13 and that they planned for it to be included in their development plans. But LPAs said they were expecting severe difficulties in implementation. The research asked LPAs to comment on the importance and 'policy difficulty' of elements of PPG13 policies. The findings were that most LPAs were aware of the significant policy areas within PPG13, and thought that they were important. However, they also identified considerable 'policy difficulties'. Even the policies which they identified as the most important, such as 'retail in centres' and 'urban housing in nodes/corridors' had relatively high 'policy difficulties'. In addition, problems such as the perceived lack of power to implement public transport policies and the difficulties of getting developers interested in mixed-use were cited as barriers to implementation.

The research then reviewed the progress that was being made in bringing PPG13 policies into local development plans. It found that, perhaps unsurprisingly, LPAs were making the most progress in the areas they thought were most important. However, there were important areas where policies were simply not making it through to local development plans. For example, the research found that most new plans encourage new development to locate in existing centres, but less than 30% of plans relate these policies to transport considerations. Also there are



problems in areas such as reducing car parking standards, with only 20% of new development plans having even considered revisions. On reviewing new development plans the research found that land use and transport issues were rarely related explicitly, or were treated as separate policy areas, rather than included in policies throughout the plan. Finally, the researchers concluded that 'There is little evidence in plans published up to September 1994 that strategies for location of development or transport provision were significantly altered as a result of PPG13' (Breheny *et al.*, 1996, p.313).

The final piece of research was undertaken for the CPRE and looks in more general terms at the inclusion of sustainable development policies into local plans (Winter, 1994). This research found that, in general, new development plans are falling far short of the high standards required to meet government expectations. Out of 70 local authorities surveyed, 15 did not refer to any of the ten sustainability criteria referred to in PPG12; the best score was only eight issues. Winter concluded from this research that new development plans are paying lip-service to sustainability issues, and that there is little evidence of substance within the local policies themselves.

All four pieces of research indicate that LPAs are not putting policies into their plans with the vigour that central government would probably have expected, and that there are specific reasons why this should be. Overall, local opposition, and expectation of implementation problems, figure highly as reasons for non-inclusion. Many policies are being watered-down or excluded during the public consultation stage of plan-making. However, in some instances LPAs simply did not believe that these types of policies applied to them. This was particularly the case if they felt their urban areas were already 'full'. Whatever the reasons, the indications are that national policies for sustainability in general, and intensification in particular are not being included in local plans with the conviction that national policy implies is essential for sustainable urban development.

### **5.3.2 Are intensification policies being translated into development patterns through the development control process, and if not why not?**

The review of research above shows that there is some doubt as to whether intensification policies may be included in local plans. However, the research also showed that in some instances local intensification policies were in place. It is important to ask how these policies are being used in the development control process. In reviewing literature to attempt to answer this question, several areas of interest emerged. The first is how the plan is treated in the new plan-led system. This is important to assess in the context of the urban intensification debate because, if policies do make their way through to local plans then, by law, they should be considered when making applications. The second is how the plans are used in practice by planners. Again, it is important to establish the significance of policies and plans in the day-to-day procedures of development control. Finally, it is useful to consider how councillors treat intensification policies when making their decisions on applications.

In the plan-led system, all decisions should be made in accordance with the relevant development plans for an area, unless material considerations indicate otherwise (*Planning and Compensation Act, 1991, Section 54A*). Therefore it is important that intensification policies are included in local plans if central government objectives are to be achieved. However, research on the use of plans since the introduction of the plan-led system questions whether their status has actually changed at all. McGregor and Ross (1995) argue that, in practice, the courts '... have not afforded development plans any new status of primacy' (*op cit.*, p.58). However, they observed that the fact that plans are seen to be more powerful in the eyes of the law has meant that preparation procedures have been more rigorous and have included improved public, interest group and developer consultation processes. The resulting plans have also been more comprehensive than their predecessors. In terms of land allocations this has meant that debate about the location and density of development is often more comprehensive than in previous local plan consultation exercises. Often, developers are keen to secure inclusion of designated development land in the plan, while local residents and interest groups focus on conservation issues. However, the legal ability to refer to 'other material considerations' in the courts still allows for considerable deviation from the plans (Healey, 1992), while it also allows the inclusion of policy guidance from PPGs, White Papers and other sources of national policy. Thus, Healey argues, that 'The weak legal link between plan and regulatory decision and the discretion available to those making development control decisions, still allows an easy drift from a "plan-led" system to a "project-led" one' (*op cit.*, p.414).

Bearing these comments in mind, it is also interesting to explore exactly how plans are used by development control officers in the development control process. Research on this issue is relatively scarce; however, indications are that the plan is just one of a number of instruments used in coming to a decision. Some in-depth work was done on this subject by Underwood (1981). Although this work pre-dates the new plan-led era, it is useful in that it explores, in detail, some of the factors which determine the behaviour of development control officers, and thus provides some interesting issues to pursue in the case studies. By comparing Underwood's findings with those in the case studies, it will be possible to gauge if any changes have come about in practice since the change in development plan status.

Underwood undertook an in-depth look at how case-workers come to their decisions on a particular planning application. She found that, because of pressures in terms of time and work load, case workers usually did not refer back to development plans directly, but used a 'short-hand' version of policies and standards taken from it. This was supplemented with 'soft' sources of information, such as discussions with colleagues about precedents, meetings with the applicant and, perhaps, information from site visits. Other 'harder' sources, such as the proposals maps of the local plan, were sometimes used, but often little attention was given to written statements accompanying maps. Underwood found that the emphasis was on information which was 'to-hand', and that clear standards - including numerical standards - which could be checked-off at committee were used in preference to descriptive policies which

were open to various interpretations. Overall though, she concludes that 'There is rarely time to assemble the amount of information that is needed for the "comprehensive rationality" required by the ideal model of planning' (*op cit.*, p.145).

An understanding of these issues is crucial to understanding how intensification policies, more than many others, might be treated in practice. Carefully worded policies, designed to avoid over-development and town cramming, may become lost amongst more restrictive numerical standards, designed to protect amenity. With similar effect, the unpopularity of intensification policies with third parties may make officers less likely to pursue such aims, in case confrontation and opposition ensue. This combination of characteristics may make the policies difficult for officers to implement and defend, even if they personally are committed to intensification (which, of course, they may not be). Conflicts may cause considerable personal and professional problems. These issues are explored in the case studies.

There is another side to this argument which is that planners, by forming their own particular 'shared ideologies' (McLoughlin, 1973; Reade, 1982), have a fair amount of discretion, and wield considerable power. The system allows them to highlight or play down particular policies. Healey refers to this when she argues that it is easy for the plan-led system to be manipulated by professional interests at all levels (Healey, 1992). Underwood, too, believes that planners are in a position to bring forward their own agendas. She found that:

The "sharp end" of the planning system is ... by no means a clearly defined stage of planning policy implementation. Instead it is an area where there is considerable scope for the use of discretion which rests fundamentally in the role of the development control officer. In formulating his or her recommendations on an application, differing weight can be given to a variety of individual or group interests ...' (Underwood, 1981, p.150)

If this is the case, then the power of officers to either embrace and promote intensification, or to discourage it, could be seen as a factor in the success of its implementation. Again, this is explored in the case studies.

The final area to review is the treatment of intensification policies by local councillors. Evidence or research specifically on this issue is limited. However, indications are that councillors may be less than enthusiastic about implementing intensification policies. A recent survey of councillors on planning committees found that 97% mentioned representing the people of their ward as their main role (Zetter *et al.*, 1997). However, as indicated before, the reactions of the existing population to urban intensification are frequently negative. Jones (1995) has reported that, in general, the public's interest in planning tends to be all one-sided, against development and change, and for conservation and stricter controls. This is echoed by empirical research by Whitehand (1989), who found that planning officers were influenced by committees, who were in turn sensitive to the anti-development stance of their constituents.

Furthermore, research into the role of elected members in development control showed that if councillors disagreed with officers on an issue, only 21% of them would look to planning principles as a means of resolving disagreements, whereas 37% would argue on issues related to authority-wide considerations and local ward issues (Zetter *et al.*, 1997).

In the light of this evidence, it is difficult to see how intensification policies can be implemented on anything like the scale set out in national guidance. Jones (1995) argues that one way forward is to undertake better consultation to inform the public and councillors about planning issues. This is especially true in stressing the strategic, rather than local, importance of intensification. However, overcoming the obstacle of getting people to vote for what they clearly believe is detrimental to them is a huge procedural and political barrier. As one critic claimed, 'it would be like asking turkeys to vote for Christmas' (councillor, personal correspondence).

### 5.3.3 Potential advances for the successful implementation of intensification policies

The preceding parts of the chapter have dealt with criticisms of the planning system as it is. Here, it is useful to review, briefly, the growing body of material which argues either that the planning system needs to be changed in some way to accommodate sustainable development, including urban intensification, or that planning can deal with intensification policies, but only if new 'tools' are made available to it. Advances in both these debates are being made very rapidly (Lusser, 1994), and what is presented here is a very brief summary of a range of the most influential new directions that are emerging<sup>4</sup>. The feasibility and desirability of these advances are explored in the case studies.

First, there are a number of studies which argue that the incremental nature of the development control system does not allow for a comprehensive review of the impacts of development, and that this is an unacceptable situation if sustainability is to be promoted (Gwilliam, 1993). Gwilliam has argued that, in order for the planning system to accommodate the new demands made upon it, it needs 'practical and available mechanisms that can improve the basis of planning judgements at both the technical and political level' (*op cit.*, p.30). To do this a number of methods have been developed to offer a holistic assessment of changes in the built and natural environment. The first major group of studies defined 'capacities' of some description, in order to offer advice on when development had reached a limit (Jacobs, 1997; Llewelyn Davies, 1994; Ove Arup and Partners *et al.*, 1993; 1995). This was seen as a potential way of setting limits above which more development would be detrimental to either the environment or an aspect of urban amenity. As yet, these techniques are in the early stages of development, and have their critics (Grigson, 1995; Packer, 1995). However, they may have some use in offering strategic planning advice to those concerned with day-to-day planning issues.

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<sup>4</sup>For a comprehensive review, see Healey (1989).

The second major advance in techniques has come from the development of measurable indicators of sustainable development. Indicators are quantifiable elements of the built and natural environment, or of social or economic conditions, which can be periodically assessed to indicate progress towards sustainable development. Their use was endorsed at the Rio Earth Summit, and they have been developed to deal with local planning issues in some local authorities in the UK. The London Planning Advisory Committee (LPAC) has recently developed its own set of 111 indicators, which it intends to monitor to assess London's progress on sustainability (LPAC, 1995). There is no doubt that, even though the approach has its critics (Burton *et al.*, 1996), it could be a useful advance for development control, as it provides another source of information on changes in the urban environment. It is interesting to see if such indicators are used in the case study boroughs.

Along with the development of new tools and approaches, there have also been calls for changes in working practices to facilitate the considerable integration of issues and responsibilities demanded by the urban sustainability agenda. Amundson (1993), for example, has suggested that 'integrated planning teams' are needed to deal with the breadth of planning and sustainability issues, and that present compartmentalisation is not helpful. Similarly, Owens has argued that what is needed is 'an integrated package of measures, designed to achieve agreed objectives in a mutually reinforcing way' (1994, p.173), and Gibbs questions 'whether existing organisational structures are appropriate for the construction and delivery of these new (sustainability) policy areas' (1994, p.107).

Finally, there are those who argue that decision-making processes themselves need to be changed to make it compulsory for local decision-makers to take on board strategic issues (Winter, 1994). Winter argues that the planning system is expected to deliver huge changes in the way we live, which may be beyond its powers unless decision-making processes are altered. He argues that because there is an element of public involvement in the planning system, then self-interest and NIMBYism will always prevail over issues of inter-generational equity or concern for the global environment. Consequently, to achieve sustainable development, decision-makers will have to make decisions which are in the long-term interests of the environment, even though they may be unpopular or politically expedient in the short term (*op cit.*, p.900). Thus, Winter argues, that decision-makers need unambiguous guidance and clearer legal obligations to enable them to resist short-term pressures, which are 'endemic in the political realities of the current system' (*op cit.*, p.900). He concludes that 'Without a change in the legal duties which apply to decision-makers there must remain considerable doubt as to whether there will be the political will to take these difficult steps' (*op cit.*, p.900).

Overall, there are a variety of ways in which it is suggested that planning could become better equipped to take on sustainability in general, and intensification in particular, be it from new tools, changes in organisational and working structures or new legal obligations. All of these

possibilities need to be considered in the case studies as potential ways to improve implementation.

### **5.4 Conclusion**

This chapter has set out a rational model of the planning system and outlined how national policies should be translated through its tiers into decisions about development at the local level. It has also presented evidence from research that there are signs that intensification policies may not be being implemented according to this model, and suggested reasons why this is so. Then, potential advances to overcome implementation problems were reviewed. These issues will now be explored in the three London boroughs in the case studies.

# Part Two

# **Chapter Six: The case studies**



## Chapter Six: The case studies

### 6.1 Introduction

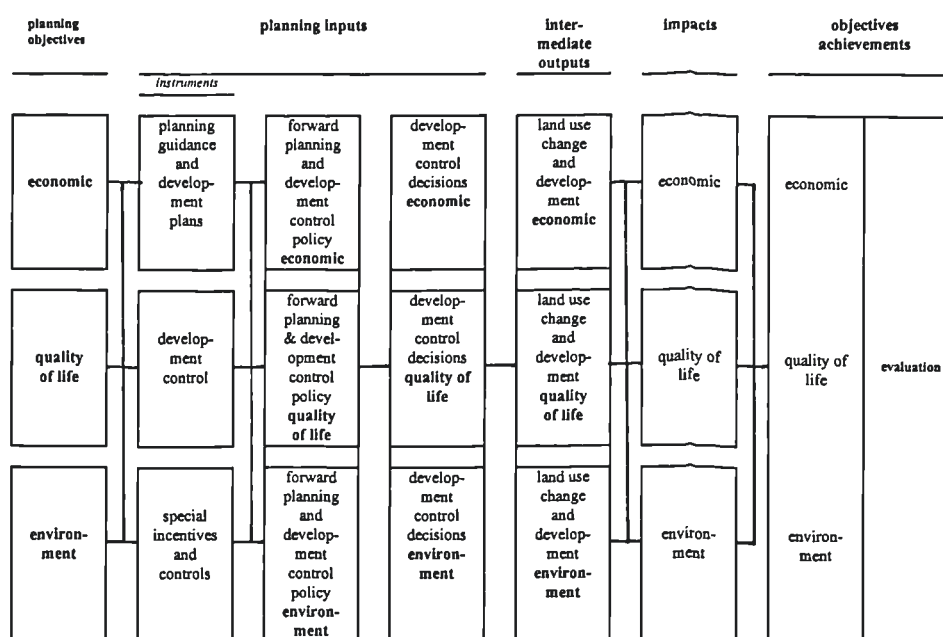
This Chapter presents the case study work on the three London boroughs. For each borough it sets out the information required to complete the ABS (as introduced in Chapter Three and shown in Fig. 3.1 and again in 6.2) and information from the implementation studies. The boroughs' locations are shown in Fig 6.1.

**Fig. 6.1 The location of the case study boroughs**



To complete the case studies, the ABS had to be completed for the three boroughs and the implementation study carried out. The ABS is split into three broad phases, and qualitative and quantitative information has to be collected to fill in the required information at each stage (Fig. 6.2 re-caps the structure of the ABS). The sources of this information vary from borough to borough, as each local authority collects different data and has different monitoring systems. Therefore, the sources will be explained at the beginning of each case study. Common sources, however, are the interviews with planners and local councillors sitting on the planning committees. Interviews were undertaken in each of the boroughs, and are summarised in Appendix A. These are drawn upon to inform the ABS and the implementation study. A brief review of the phases of the ABS will help to clarify how the information in this chapter is presented.

Fig. 6.2 The adapted balance sheet



## 6.2 Explanation of the presentation of the case study material

As stated in Chapter Three, the first stage of the ABS requires determining the **inputs** into the planning system. This means identifying policies and objectives at national, regional and local levels from policy documents, and identifying special incentives or controls used in the three boroughs. The national policies and objectives have already been identified in Chapter Four (Tables 4.1, 4.2 and 4.3). The regional policies, and also London-wide policies are presented in Appendix D (Tables D.1, D.2 and D.3), and in summary in Section 6.3. The local policies for each case study are presented in full in tables in Appendix E. The method then requires the identification and analysis of the decisions about development which are subsequently made, through the planning system, in each case study. This means logging all applications granted consent over the study period and deciding whether the decisions relate to economic, quality of life or environmental objectives. This material is presented in Appendix B.

The second phase of the ABS attempts to assess the development patterns or trends these decisions lead to on the ground. This phase is presented as an analysis of the trends evident in the development control data, but is supplemented by additional monitoring data from a number of sources which record particular development patterns, for example the amount of derelict land used, or the amount of green space lost to development. The ABS source document (DoE, 1992b) suggests using both a top-down analysis of trends and a bottom-up analysis of individual sites. This two-level approach will be applied where appropriate data exists. The data related to this section is presented in full in Appendix C, and is seen in the ABS as constituting the **outputs** of the planning system. The information on the inputs and outputs is set out together in the case studies. First the policies and objectives are summarised

and then an account of how well the policy was implemented over the study period is given, with accompanying data.

The next section, which is still part of performance monitoring, requires information on the **impacts** of these development patterns. Possible impacts were identified from the discussion presented in Chapter Four and, again, fall into the three categories: economic, quality of life and environment. Data on the impacts was collected from a variety of sources, and is presented, along with the trend data, in Appendix C. Where no data could be found, opinions of the planners in the boroughs were sought. This information is presented in tabulated form for each case study area because the same impacts are measured in each place. Therefore, by presenting the evidence clearly in tables, cross-comparisons can be easily made, if desired.

All of the above information is required to undertake the third stage of the ABS, the **evaluation**. The ABS allows an evaluation of how far planning has achieved what was intended, in terms of the scale and pattern of development, and how far the results have been worthwhile, in terms of side-effects or impacts (DoE, 1992b). Thus, the evaluation stage requires the researcher to compare the objectives of policies with the outcomes, and take into consideration the magnitude of the economic, quality of life and environmental impacts. As noted in Chapter Three, this evaluation stage is open to subjective interpretation. However, the fact that all the information on which the evaluation is made is available to scrutiny at least facilitates re-examination of the judgements. The evaluations are presented in table form as this seemed the best way of presenting a wealth of complex information, and again facilitated cross-comparisons.

Evaluations are made of the local policies. It is expected that national and regional policies should be included at the local level, so the analysis is not repeated for all three levels. However, the evaluation makes a note of any central or regional policies which have been omitted at the local level, and these omissions and the consequent implications for policy success at all levels are discussed in Chapter Seven.

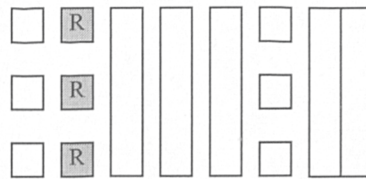
Following this evaluation, information is presented relating to policy implementation in the three boroughs, following the structure set out in the preceding chapter. It starts with information on whether policies have been included in the development plans at all levels, then provides an analysis of how the plans are used, and how decisions are made at the local level. This includes information on implementation from interviews with planners and with local councillors on the planning committees in each borough.

The case study information is presented in sequential order, following the structure of the ABS. The only exception to this is the coverage of regional and London-wide policies and objectives. As these are the same for all three boroughs, they are presented at the beginning of the chapter, but should be considered along with national policies and objectives presented in Chapter Four

with each case study. It should be stressed here that the ABS requires a mass of data and information to be presented before an analysis of it is undertaken. It is, perhaps, a drawback of the method that so much information has to be 'held' prior to analysis. However, it is important that all the relevant information is presented before any evaluations are undertaken; this is, after all, the purpose of a balance sheet technique. Overall, the presentation of this material gives a rich overview of urban intensification policies and their implementation in the three London boroughs over a ten year period.

### 6.3 Regional and London-wide planning policy sources

R - Regional

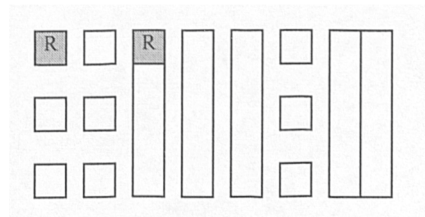


**Regional Guidance** over the study period came from the Secretary of State for the Environment in the form of, first, three letters produced in 1980, 1984 and 1986. These were collated to form *PPG9: Regional Planning Guidance for the South East* (DoE, 1989a). Then, in 1994, *RPG9: Regional Planning Guidance for the South East* was produced by the DoE and the South East Regional Office. This advice was informed by the South East Regional Planning Conference's (SERPLAN) 1990 advice, contained in *A New Strategy for the South East*.

**Guidance for London** was contained from 1976-1989 officially in the Greater London Development Plan (GLDP), produced by the Greater London Council (GLC). This document was amended and added to on numerous occasions (a new draft which was completed in 1984 was ready to be adopted when the GLC was abolished in 1986 [Greed, 1996]). It was still the main London-wide policy source for local plans throughout the late seventies and most of the 1980s and is the guidance referred to by the three boroughs in their development plans. The next official London-wide advice was contained in *RPG3: Strategic Guidance for London*, produced in 1989 by the DoE. Following this, in 1996, the Government Office for London (GOL) produced *Strategic Guidance for London*. This contained advice from LPAC (1994a), which was formed after considerable consultation with the London boroughs.

#### 6.3.1 Regional and London-wide intensification policies with economic objectives (Table D.1)

R - Regional



In the late 1980s and early 1990s **objectives** at a regional and London-wide level concentrated on making the most of the South East's existing economic assets. They mirrored national aims and advocated using derelict and vacant land in urban areas to make the South East, and especially London, a more attractive place for businesses to locate (DoE, 1989a; Simmie, 1994). Objectives from SERPLAN to prevent the urban exodus of activity and investment into greenfield sites sought to strengthen London's economy in both the UK and European markets.

By the mid 1990s attention was turning to integrating these aims with those of sustainability. Localised economic aims, such as enhancing local access to employment and supporting the viability of local services, became important (GOL, 1996), and economic aims were linked to those of regeneration in a broader sense. In particular, a hierarchy of commercial centres devised by LPAC and GOL was implemented throughout London as a basis for concentrating trip-generating development. In UDPs, LPAs were expected to guide development, as far as possible, to these designated centres in order to improve local economies, but also to reduce the use of environmentally damaging modes of transport and build strong local communities with easy access to facilities (GOL, 1996).

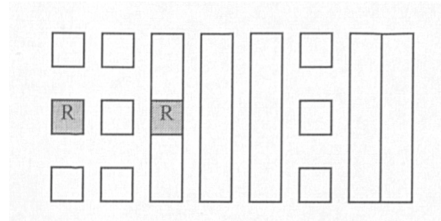
Regional **policies** throughout the study period stressed the importance of re-using urban land and the existing urban fabric and reviving older urban areas, rather than taking new land for development. This was seen as part of a strategy to secure economic development in the region. However, until 1994, regional guidance took the form of very short statements of policy from central government which gave little guidance on strategically important economic issues such as retail and employment locations. However, in 1994, *RPG9: Regional Guidance for the South East*, followed national guidance, as given in a number of PPGs, to locate retail and employment uses in existing town and district centres. This aim, in combination with co-ordinated transport policies was seen as a means of contributing to the economic strength of existing centres (DoE and South East Regional Office, 1994).

It is interesting to note that, at the London-wide level, the GLDP did not contain any policies which promoted intensification or centralisation for economic reasons. However, in 1989, *RPG3: Strategic Guidance for London* advocated the use of disused utility sites for economic development to assist urban regeneration. It also supported the idea of locating future retail development in existing centres to aid regeneration and provide local jobs (DoE, 1989b, para.72). It also urged LPAs to continue to strengthen green belt policies to ensure that new economic activity was concentrated in urban areas in need of regeneration. The most up-to-date strategic advice for London (GOL, 1996) updates and strengthens this advice, emphasising local economic policies, and the desirability of co-ordinating these with sustainability arguments about trip generation. In particular, policies are in place to ensure that LPAs continue to promote retail and employment in existing centres, promote local policies which ensure that jobs and housing are within easy access of each other and permit more intensive use of housing to support the local economy. RPG3 also reiterates guidance given in PPG6

referring to the sequential test for retail development, and urges LPAs to use such tests. It also stresses the need for integrated transport policies at the local level so as not to impede the economic viability of town centres (GOL, 1996, para.6.4).

**6.3.2 Regional and London-wide intensification policies with quality of life objectives (Table D.2)**

R - Regional



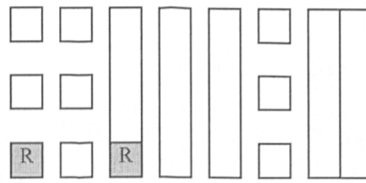
The main regional quality of life **objectives** relate to providing homes for the region's population, especially for smaller households and those who want a high quality urban location. Other objectives relate to improving accessibility by locating retail uses and workplaces where they are easily reached by public transport and facilitate multiple trip-ends to those without access to a car.

The main objectives of London-wide policy are similar. Even in 1976 development of under-used and vacant land in urban areas was seen as a good location for non-family households and for those displaced by re-development from problem housing areas (GLC, 1976). However, it must be said that, overall, the GLDP's objectives were against intensification and in favour of offering all of London's population very high space standards. This changed, in line with regional and national policies, in the 1990s when sustainability goals were introduced.

The main quality of life **policies** throughout the study period concerned providing more homes in the region. As far back as 1976 the GLDP had a policy which stated that 'higher densities than would otherwise be permitted may be suitable for non-family housing in Central London, at strategic centres, and at other locations within easy walking access to public transport, to open space, or to other facilities' (GLC, 1976, para.3.24). The GLDP also contained policies about making the most of urban land and built stock, and making better use of existing infrastructure. However, as stated above, these policies were contained in a plan which was fundamentally anti-intensification. Since the late 1980s, policies have focused on improving access. Both regional and London-wide policies now urge LPAs to draw up local policies which locate new retail and employment in areas which are accessible by a range of modes of transport, in the hope of reducing the use of the car. In particular, this period has seen regional and London-wide policies to encourage the development of co-ordinated transport and land use planning.

6.3.3 Regional and London-wide intensification policies with environmental objectives (Table D.3)

R - Regional



Throughout the study period, regional environmental **objectives** concentrated on promoting intensification to deter scattered and haphazard development in the countryside, seen as harmful to the rural environment and destructive to good agricultural land. Thus, objectives to recycle land and maintain capacities in the face of 'latent dispersal pressures' prevailed (SERPLAN, 1990, para.2.11). In 1994, the idea that urban intensification may have environmental benefits to the city, as well as the countryside, was stressed. Objectives such as improving the urban environment by developing derelict and under used land were seen as contributing to sustainable development. In 1994 objectives stressing the need to reduce travel by modes of transport which produce harmful emissions were also clearly stated. The environmental benefits of relating land use and transport were introduced. In particular, aims of locating employment, leisure facilities and housing close together to encourage walking, cycling and other energy-efficient modes of travel were stated.

London-wide policies also had two main objectives. The first was to restrict urban sprawl and the second to reduce transport emissions in the capital. The first aim can be found in policy statements throughout the study period. The aims of reducing traffic levels have also been present for some time, but reduction through urban intensification was introduced in 1996. The 1996 advice was unequivocal in its endorsement of the benefits of reducing traffic through urban intensification. **Policies** to reduce emissions through consolidation can be found, in the 1996 advice, not just in sections on transport, but also in those on the economy, housing and town centres and retailing, proving that the aim is pervading all significant planning policies. However, these policies sit alongside policies to conserve open land within the city and guard against overcrowding.

**Harrow**



## 6.4 Harrow: Introduction

Harrow is an outer London borough. It is home to 206,600 people, constituting 75,498 separate households. The population declined between the early 1950s and 1980s. Since then it has increased. Sub-regional projections (1993 based) show that the population is projected to rise by 700 people per year until 2006, then by 800 per year until 2011. The borough has 39.32 persons per hectare (OPCS, 1993). Average household size in the borough is decreasing, following national trends. Between 1981 and 1991 single person households increased by 33% and projections suggest that this type of household will increase faster than any other type in the near future. The borough is characterised by higher than average employment rates and a generally healthy local economy.

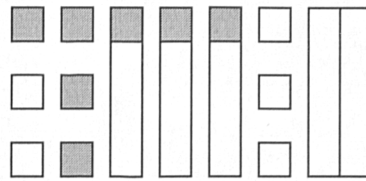
Harrow's environment is described by LPAC as having 'a low density character and open spaces which should be preserved in the face of a variety of development pressures' (1994a, p.ii). The borough has a 'leafy' image with many high quality pre- and inter-war suburban areas, bounded by green belt. The development plans which cover the study period in Harrow are the *Harrow Borough Local Plan* (London Borough of Harrow [LBH], 1986) and the *Harrow Unitary Development Plan* (LBH, 1994). The Harrow Borough Local Plan was supplemented, in 1990, by *Interim Development Control Policies: Residential Development* (LBH, 1990c). No other special incentives or controls were identified.

### 6.4.1 Urban intensification policies and objectives in Harrow

Urban intensification policies with economic, quality of life and environmental objectives, drawn from the local development plans covering the study period in Harrow are set out in Tables E.1, E.2 and E.3 respectively (Appendix E). The information in these tables is summarised below. Each separate policy issue and the objective it is trying to achieve are presented (in bold). Following each policy is a summary of evidence on that policy's performance over the study period in terms of development trends. This information is collected from data on applications granted and other sources which catalogue patterns of development (Appendices B and C).

For Harrow, the main sources of information on applications granted are first, the LPAC monitoring system, started in 1988, which records applications over 10 units for housing and over 1000 m.sq. for other uses. Second, this information is supplemented, from 1993 onwards, by data on all applications granted, whatever their size, from the *Second Annual Review and Monitoring Report on the Harrow UDP* (LBH, 1997). This gives an analysis of applications by Use Class (contained in the Town and Country Planning [Use Classes] Order 1987, as amended by the Town and Country Planning [Use Classes] Amendment Order in 1995). The system also includes appeals data. Unfortunately it does not include information on completions. Other trends data comes from a number of sources which are referred to as they are used, and recorded in Appendix C.

**6.4.2 Development control decisions and the subsequent development patterns and trends relating to urban intensification policies with economic objectives in Harrow**



- **The council will encourage offices to locate in the existing district and local centres to help these centres provide integrated shopping and transport facilities so that workers have access to retail and transport facilities.**

Data on applications granted shows the number of large office developments in Harrow has decreased since a peak in 1990, when 40,046 m.sq. was granted, to no major developments in 1995 and 10,426 m.sq. in 1996 (Table B.2). A closer look at the office applications from 1993-1996, for which more detailed information is available, shows that in 1993 19,274 m.sq. was granted, falling to 2517 m.sq. in 1995 (Table B.4). There was a rise again in 1996, but this was accounted for by renewals of previous applications. Much of the activity in the office sector comes from changes of use. In 1994 and 1995 changes of use were more significant than new build. In 1995 and 1996 changes of use meant that there was actually an overall net loss of office floorspace granted.

The LPA has been relatively successful in its policy of encouraging more office space in the borough overall, even though the last two years have seen a downturn and losses due to changes of use. Over the last five years there have been four times as many approvals than refusals each year, and the majority of refusals are for change of use where an existing use is being protected.

The number of appeals for office uses has fluctuated over the last five years, although the numbers remain relatively small, with one refusal in 1993, but ten in 1994 (LBH, 1997). However, issues relating to intensification are hardly ever the cause of appeals. Indications are that, with the exception of one large office development that was allowed on appeal, Harrow is managing to locate almost all new office development in existing centres in accordance with the plan, thus offering opportunities for employees to enjoy the benefits of a centralised location.

- **The council will encourage and protect shopping uses in the existing district and local centres to safeguard their vitality and viability and maintain the existing distribution of centres and the diversity of functions within them.**

The amount of floorspace in applications granted for large retail schemes (over 1,000 m.sq.) has fluctuated greatly in Harrow since 1988 (Table B.2). In 1988, 18,730 m.sq. was approved, the highest amount of the decade. The period ended with only 4,000 m.sq. in 1995 and 1996. An analysis of the years 1993-1996 for all retail applications shows a decline since 1993, when a major application for the St George's Centre in Harrow town centre was granted (Table B.3). In 1994 two new supermarkets were approved, one in South Harrow, which complied with policies to concentrate retail in existing centres, the other, at Pinner Green was in an 'out-of-town' location and was allowed on appeal (LBH, 1997). The number of appeals rose from three in 1993 to 17 in 1996. The LPA is also becoming less successful at appeals, losing only 17% in 1994, but 41% in 1996. Several of these appeals related to locational issues but most were concerned with issues such as access, amenity and losses of other uses protected in the plan.

In terms of the development patterns which resulted from these applications, the LPA can be seen as relatively successful in maintaining retail in the existing centres. In 1994, 218,957 m.sq. of the borough's gross retail floorspace was located within the centres, and only 4,631 m.sq. outside (Table C.7). There are also relatively low vacancy rates (10%) in the borough's retail stock, showing that centres were well used (Table C.9).

- **Harrow town centre will be promoted as the borough's strategic centre. It will be the focus for major new retail development and the council will seek to improve its accessibility and attractiveness. This will maintain the vitality and viability of the centre.**

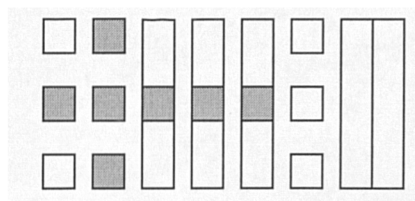
The development control data show that the major retail application of the last decade in Harrow was for the St George's centre in Harrow town centre - a total of 16,700 m.sq. of new retail space (Table B.3; LBH, 1994). This centre has been accompanied by a package of measures to improve the town centre, such as an urban design scheme and traffic management. It appears that the policy has been successful, as Harrow town centre increased its place in a national ranking of shopping centres (based on the number of multiple retailers) by 39 places between 1984 and 1995. In 1995 it was ranked 67 in the UK (Hillier Parker, 1996).

- **Industrial and warehousing uses will be retained and encouraged in the borough in existing industrial areas and any under used land in these areas will be quickly redeveloped for similar uses. This should improve the employment opportunities and match jobs with skills in the borough.**

There are no data covering the whole period in this sector, but an analysis of applications granted from 1993-1996 shows that activity involving industrial uses was greatest in 1996, with 28 permissions being granted (Table B.6). 1996 was the only year, since 1993, that there was an overall net gain in industrial floorspace permitted. The majority of this floorspace was accounted for by two major schemes, a new process and production building for Kodak and

new light industrial units in one of the designated industrial areas (LBH, 1997). The LPA has tried extremely hard not to lose industrial premises from the borough. It has refused no more than four applications for industrial uses in any one year and has not lost any appeals which could have resulted in the loss of industrial uses. However, it is also finding it difficult to attract industrial uses into the borough and currently has very high vacancy rates for industrial stock, with 27% unoccupied (Table C.9). The borough also saw a drop of 9.32% in borough residents working in manufacturing jobs 1981-1991 (Table C.14). However, this is a trend which is shared across London. The LPA has been successful in using vacant and derelict land though, there is now only 0.1 hectares of land in the borough which fits the DoE's description of derelict land (Table C.32).

**6.4.3 Development control decisions and the subsequent development patterns and trends relating to urban intensification policies with quality of life objectives in Harrow**



- **The council will consider favourably applications to convert or extend housing so as to provide dwellings of an appropriate size and type for Harrow's residents.**

The data collected for monitoring housing provision are not collated separately for conversions and new build. However, there is information on the type of new housing approved and its size from 1993 onwards (Table B.7). Some of these applications will have been for conversions, but extensions are unlikely to have been included as they are usually only for one or two habitable rooms. In the five year period 1992-1996 the majority of completed dwellings have been one or two bedroom units, with two bedroom units being the largest category every year (Table B.8). This suggests that the LPA is being successful in tackling the need for smaller housing, with some of this total provided by conversions. LPAC's study of housing capacity in 1994 suggests that there is the potential for 375 new units from conversions between 1992 and 2006 (LPAC, 1994b). The planners interviewed also reported that extension activity has been constant, and at a high rate, throughout the period, with many home owners enlarging their homes, usually to provide room for other family members, especially elderly relatives.

- **The council will refuse applications for change of use from residential to non-residential uses to resist the loss of housing in the borough.**

There are no available data relating to the loss of residential units from change of use or demolitions. However, the planners interviewed thought that the numbers were small. The fact that the borough is meeting its housing targets suggests that large scale loss is not a problem.

- **The council will seek the provision of 4500 additional units between 1987 and 2001 on sites designated in the development plans to provide suitable housing to meet the needs of Harrow residents.**

Overall, the number of large applications for housing (10 units or more) in Harrow has dropped between 1988 and 1996 (Table B.2). In 1988, 35 applications for 10 or more units were granted, a total of 1064 new residential units. In contrast, in 1996, only three large applications were granted, a total of 87 new units. However, a detailed look at all housing applications, not just those of 10 units or more, shows a slightly different picture (Table, B.7).

The number of approved permissions affecting C3 uses fell between 1993 and 1995, from 461 new units to 94, but increased in 1996 to 208 units. These figures mean that Harrow is meeting its targets for housing provision currently, even though the overall trend since 1988 is downwards. The scope for continuing to meet the targets was questioned by one of the planners interviewed who was concerned that, in future years, the provision of land for housing may become more problematic. This is because the most attractive sites have already been used and policies on 'town-cramming' and the protection of the character of residential areas have been strengthened.

Overall, housing development in Harrow has recently been guided to the most sustainable locations, such as near transport nodes. In the 1980s there was considerable development in the suburban areas of Harrow, which gave rise to the protectionist policies developed later in the period, including those derived from Wootten Jeffreys' study of Harrow's residential areas in 1989. Currently, out of a total stock of 163,450 dwellings, 10,274 are located within town centres, a relatively small 6.2% (Table C.20). This said, LPAC's housing capacity study reports that there is the capacity for 3175 new units between 1992 and 2006, the majority on large sites (220 units), 820 on windfall sites, 760 on small sites and 375 from conversions (LPAC, 1994b). It is, however, interesting to note that the number of appeals relating to housing has increased to a high in 1996 (LBH, 1997). The LPA is not only fighting more appeals, but it also lost more in 1996 than in previous years, indicating that the inspector is putting more weight on strategic issues and overriding the local, often protectionist, stance (planner interview).

- **The council will try to meet density standards as set out in the development plans. The standards are higher for non family housing and for dwellings in, or near, centres which are well serviced by public transport and near open space and other facilities. This should help to provide good standards of development and meet the housing needs of the borough's residents.**

Indications are that the density standards in the HBLP and the UDP are strictly adhered to, but are more likely to be successful at the lower end of the density range. The local preference is always to keep densities down (local councillor and planner interviews). Where the LPA has

attempted to increase densities on accessible sites it has met with opposition. However, more influential than density standards are the garden size standards contained in supplementary guidance (LBH, 1990c). These have been revised upwards during the case study period to allow larger gardens, and these policies are used to determine garden sizes for almost all new units. There was recently a test case in the borough for providing housing at the top end of the density standards in the town centre. Whilst the planning officers and transport section recommended approval on sustainability grounds, the application was refused by members who thought that the reduced parking standards were unacceptable (planner interview).

- **Within strategic, district and local centres, redevelopment schemes involving the demolition of residential units should provide at least the same number of residential units. This will retain accommodation in town centres and maintain their liveliness. It may also help meet the needs of smaller households.**

Data on numbers of dwellings provided in redevelopment schemes is available only from 1993 onwards in Harrow (Table B.7). The data show that, between 1993 and 1996, 973 dwellings were gained in redevelopments at higher densities. Over the same period 354 additional units were refused permission, mainly on the grounds of over-development or reduction in amenity or character of the existing area. The LPA felt that it had managed this policy successfully and had managed to strike the balance required in national guidance between development and environmental quality. It also felt that, because many of the new dwellings were smaller units, it had contributed where there was a housing need.

- **Entertainment and leisure facilities should be encouraged to remain in district and local centres to contribute to meeting overall leisure needs and to maintain the quality, use and accessibility of such facilities.**

Again, the most detailed data are available from 1993 onwards. Table B.9 shows that for D1 uses, including non-residential institutions, such as surgeries, day centres, educational establishments, museums libraries and religious premises, the number of applications granted remained relatively constant over the period. Annually, around 50-60 applications were granted. New developments counted for, on average, 40% of floorspace. The remainder were mainly extensions, and the bulk of these were in schools in the borough (LBH, 1997). Over the period there had been an increase in the number of day-centres approved. These have been located in easily accessible areas, one being permitted in the existing Harrow Leisure Centre grounds.

D2 applications granted, including uses such as cinemas, concert halls and indoor sports facilities, fell between 1993 and 1996 (Table B.10). However, 1993 had seen the granting of a cinema complex, and 'The Edge', a family entertainment centre, both in Harrow town centre. Other permissions in this sector were mainly extensions to sports clubs, youth halls and so on.

Again, the LPA felt confident that the majority of applications granted had been in accordance with the local plan. There were only a few appeals in this sector and the LPA had a good record of success against them (LBH, 1997). However, it must be said that Harrow is still relatively lacking in some important facilities. For example, in 1992 the borough only had one swimming pool and one theatre, a low provision for a borough of its size.

**6.4.4 Development control decisions and the subsequent development patterns and trends relating to urban intensification policies with environmental objectives in Harrow**



- **Keep land in the green belt primarily open in character to limit urban development and preserve valuable agricultural land.**

The total number of applications approved in the green belt are small, averaging 31 per annum over the study period. Most of these applications are for small-scale householder additions, usually not involving an increase in floorspace (Table B.11). However, there has been an increase in the trend for approval of houses in the green belt 1993-1996, which the LPA would like to see stopped. In 1995, 34 housing units were granted permission, although most of these were a renewal of a previous permission. The LPA, however, does not see this as a trend which is set to continue, and argues that specific circumstances allowed this high number which will not occur again. Having said this, Harrow still has a considerable amount of green belt, 1028 hectares in all, of which 64% is accessible to the public (Table C.28).

- **The council will require a high standard of design and layout in new developments including parking, garden size and open space provision which meet the council's standards. This should ensure high standards in the built environment and contribute to environmental character.**

It is difficult to quantify design standards, but, Harrow has attempted to do this by producing detailed standards and guidelines which, as reported above, are usually adhered to by members at the decision-making stage (LBH, 1990c; 1994). The standards also offer developers more certainty in knowing what will be acceptable. However, as noted above, the LPA is now trying to raise density standards in more central locations to meet strategic environmental aims. Unfortunately, this has been unsuccessful in Harrow; reduction of parking standards is seen as a reduction in housing quality for new occupiers (councillor and planner interviews).

Environmental quality is a very important issue in Harrow and the production in 1989 of *Environmental Assessment of Residential Areas* (EARA) (Wootten Jeffreys, 1989) led the way to protectionist policies which seek to preserve the character of the existing low density suburbs. This protectionist stance is not shared by all at the LPA. One of the planners interviewed thought that the suburban areas should take more of their share of new development, but agreed that this would be difficult to implement because of the restrictive nature of the policies.

- **The council will use its statutory powers to pursue the improvement of sites in the borough which are detrimental to the amenities of the borough, and to improve the appearance of any vacant sites.**

The LPA have been successful in implementing this policy, although the amounts of land involved are small. There is very little under used or vacant land in the borough, and this has been the case throughout the study period. Currently only 0.1 hectares of land in Harrow meet the DoE's definition of derelict land (Table C.32).

- **New developments, especially those which generate employment, will be located in existing centres so as to encourage fewer journeys to work by car and more use of emissions-efficient modes, such as public transport.**

As reported above (6.3.2), Harrow has been relatively successful at locating offices and retail uses in existing centres. The question of whether this has reduced the use of the car and encouraged more energy-efficient modes to be used is less clear. Certainly between 1981 and 1991 the Census (OPCS, 1993) shows that the number of people using public transport to get to work rose by 2.23%, but the numbers using their cars also rose, by 4.52% (Table C.42). Furthermore 59.8% of Harrow's population work outside the borough, so locational policies within the borough are only targeted at 40.2% of the working population. A 1994 data set (LBH, 1994) shows that the proportion of Harrow's residents using the bus and underground to get to work may have increased slightly since 1985. The only detailed study of travel to work in Harrow (LBH, 1991b) shows that although location and length of journey are important variables in choosing mode of travel, even for short and quick journeys the car is very popular. Out of a sample of 776 people working and living in Harrow, 100 used the bus to get to work, 28 used the underground and 417 drove; 174 walked, but only 21 cycled. These findings suggest that although small changes may be being made, the fact that so many people work outside the borough and that so many still use their cars for very local trips casts doubt on the effectiveness of locational policies to make significant changes in modes of travel to work.



## 6.4.5 Economic impacts of intensification in Harrow

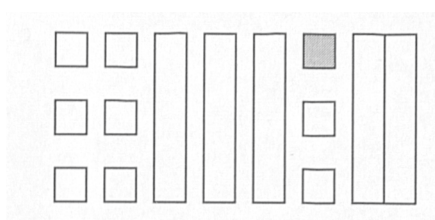


Table 6.1 Economic impacts of intensification in Harrow

Impact	Evidence of impact
improved vitality and viability of centres due to higher population densities which provide a critical mass to support businesses, and because planning policies are reducing competition from out-of-town developments	Harrow town centre and other district and local centres have benefited from policies to refuse applications for retail developments which would adversely affect the economic viability of existing centres. Planners believe they have been relatively successful in encouraging a mix of uses. Permissions granted for restaurants and bars have increased annually since 1993 (from 7 to 23 in 1996) (LBH, 1997). Also, the number of VAT-registered businesses in the borough is relatively high. The number of VAT registered businesses increased from 4,750 in 1981 to 6,110 in 1994 and many of these businesses have been located in existing centres (Table C.16). There are also low vacancy rates for retail (10%), and this figure represents an improvement from previous years (Table C.9). However, planners are unclear about how much of these changes are a result of planning policies. Most are seen as the result of broader economic trends. Nevertheless, planning is definitely playing a part in this increased vitality by refusing applications for out-of-town developments, although a few applications were approved early in the study period.
benefits to the LPA in terms of cheaper infrastructure provision	There is no data on comparative infrastructure costs. Planners agree that there is increased wear and tear in more heavily populated areas, but believe that there are complex trade-offs involved in calculating costs in different locations.
house prices may increase if the area is improved due to intensification	There is no proof in Harrow that house prices have been affected positively by intensification. In fact, the opposite appears to be true. The high value properties are in the low density suburban areas, and in these neighbourhoods residents are concerned about reductions in the value of their homes due to 'town cramming', especially by buildings in adjacent back gardens, which they believe harms the character of their neighbourhoods (Wootten Jeffreys, 1989). Harrow has few areas in need of upgrading, and therefore opportunities for increasing property values through intensification are very limited.

<p>reduced private travel costs to businesses and residents because trip lengths are reduced and traffic volumes reduced</p>	<p>Average traffic speeds are getting slower in outer London (19.2 mph in 1980, 16.5 mph in 1992, LBH, 1994), therefore the same trips are taking longer to make by car or bus. The <i>Harrow Employers Surveys</i> (LBH, 1990b; 1991a) showed that increased travel times and congestion were cited as an economic cost by local businesses. Commuting patterns in Harrow indicate that large numbers of people are willing to travel for long periods daily. The most frequent journey time in a sample of 2568 people in 1991 was 16-30 minutes (723 people) (LBH, 1991b). However, 562 travelled for 46-60 minutes and 135 for 61-75 minutes. 14 even travelled for 106-120 minutes. Thus, a large proportion of Harrow's residents and businesses are still incurring high costs in terms of travel time.</p>
<p>higher housing costs because infill housing is more expensive to produce than greenfield housing</p>	<p>Planners in Harrow were not convinced by arguments that infill housing could potentially cost more. A number of issues other than site location are also important, such as planning gain, permitted densities etc.</p>
<p>improved access to employment for urban residents because homes located near workplaces</p>	<p>Harrow appears to have been successful in offering access to employment. Firstly, unemployment rates in the borough are lower than the Greater London average. In 1991, 7.49% of the population was unemployed (Table, C.11 and C.12). In 1997 this had dropped to just over 5% (LBH, 1997). Also, whilst Harrow lost employment in the manufacturing sector in the 1980s, it has now considerably increased the proportion and number of jobs in the banking and finance sector, and in government and other services (Table C.14). Between 1981 and 1992 the number of people working outside the borough dropped and the number travelling to it for work increased (LBH, 1994). However, more people are commuting into central London, especially those who are more skilled, indicating that Harrow is very much part of the Greater London employment market. Thus, securing more specialised, localised jobs may prove difficult.</p>
<p>fewer opportunities to secure planning gain because infill developments are usually smaller than those on greenfield sites</p>	<p>Harrow council has policies to seek planning gain in its UDP, in particular for improvements within Harrow town centre or other district or local centres (LBH, 1994). The LPA has been successful in achieving planning gain for some larger schemes but does not usually pursue it in smaller developments.</p>

6.4.6 Quality of life impacts of intensification in Harrow

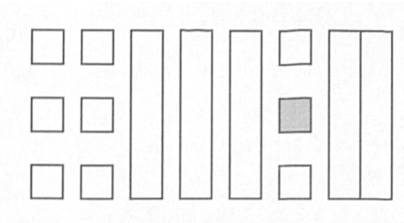


Table 6.2 Quality of life impacts of intensification in Harrow

Impact	Evidence of impact
reduction in private space - smaller houses and smaller gardens, or no gardens	Average house sizes in the borough have diminished, due to the increased number of one and two bedroom units compared with family dwellings, and the number of conversions and sub-divisions (Table B.7). However, the LPA sees this as meeting a need for smaller affordable units, rather than a reduction in standards.
better facilities because there are more people to support them	As the development control data showed, Harrow has gained cultural, medical, recreational and leisure facilities over the period, and has not seen any significant losses (Table B.9; B.10). Thus indications are that the population densities are sufficient to support local facilities. However, the borough is still lacking in some facilities. There is also a perception that some facilities may be reaching user capacity, but overall they are not thought to be overstretched (LBH, 1991b).
safer centres due to increased numbers of people in the public realm - better natural surveillance during the day and night	There is no data available to prove or disprove a link between intensification and crime in Harrow. Those interviewed made no link.
improved accessibility because services and facilities are more localised and can be reached by a variety of modes of transport	Accessibility to facilities, shops and employment is seen as very important in the UDP. In particular it highlights the inequality caused by out-of-town shops, accessible only by car. The LPA's success in locating new leisure, retail and employment in existing town centres and protecting local facilities has made a contribution to accessibility. 50.6% of Harrow's population live within 400m of a GP surgery or health centre, 60.6% live within 400m of a food shop and 40.3% live near a post office or bank (Table C.19). These figures compare favourably with other boroughs and suggest Harrow's commitment to protecting local facilities is working well, although there is room for improvement.
reduced traffic and, thus, traffic related problems due to transfers to less environmentally damaging modes of transport, including public transport, walking and cycling	As in most areas of the UK, Harrow is experiencing increasing traffic-related problems. It is an area with heavy through traffic and high car ownership rates. Local consultation exercises for the EARA found that car parking and traffic were seen as the biggest areas of public concern (Wooten Jeffreys, 1989). Unfortunately, although planners felt that some headway had been made in this matter, with traffic management schemes and new highways, overall traffic problems were still on the increase.

<p>reduced access to open space due to open land being used for development</p>	<p>Overall, 25.7% of Harrow's total area is protected open space (Table C.27). Much of this is green belt, of which 64% is accessible to the public. The majority of the rest is MOL, of which 91% is accessible (Table C.28). Over the study period there were no major losses in this resource. In fact, since 1971, Harrow has gained 21.9 hectares of public open space, an increase of 6% in the total stock (Table C.31). Therefore it seems that the LPA has been successful in maintaining access to open space.</p>
<p>neighbourhoods are more socially integrated, there is more social cohesion and better social conditions generally because of increased numbers of people</p>	<p>The Harrow Residents Survey (LBH, 1991b) showed that far from embracing intensification, Harrow residents were concerned about the negative effects of higher densities. Planners and councillors report that this is especially true when affordable housing units are proposed. There are reports of negative attitudes to members of different incoming social groups, including ethnic minorities, who may have different housing needs. Far from harmonising social conditions, it seems intensification produces anti-social attitudes and behaviour. Another negative social impact is overcrowding, usually defined as persons living at densities &gt;1 person per room (OPCS, 1993). The most up-to-date information for Harrow is from 1991, which indicates that 6.5% of the population is living at &gt;1 person per room and 1.4.% at &gt;1.5 persons per room (Table, C.18).</p>
<p>potential bad neighbour effects of mixed-use developments</p>	<p>Bad neighbour problems in the borough are not severe, because most of it is functionally segregated. Most complaints came from domestic nuisance (Table C.17). However, in mixed-use areas there have been complaints about negative effects, especially from food outlets and some light industrial uses; but these complaints have to be balanced with those expressing enjoyment of new facilities.</p>
<p>better public transport because of increased densities</p>	<p>Over the study period more bus routes have been provided to Harrow town centre and to most of the other district centres (LBH, 1994). However, as average traffic speeds are declining in outer London, there is no guarantee that the efficiency of public transport has improved.</p>

6.4.7 Environmental impacts of intensification in Harrow

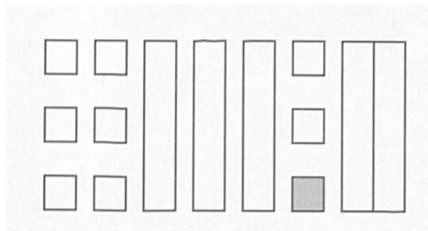
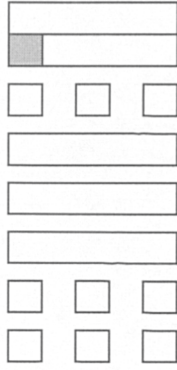


Table 6.3 Environmental impacts of intensification in Harrow

Impact	Evidence of impact
reduced number and length of trips by modes of transport which are harmful to the environment, primarily the private car, and increases in other modes - walking, cycling and public transport	As stated above, there is no proof that the use of energy-inefficient modes of transport in Harrow is declining due to intensification. Harrow residents are still commuting long distances and only very minor improvements in the use of emissions-efficient modes have been recorded. However, planners think that achieving this aim requires a long term approach.
protection of the countryside and valuable rural land and green belt	Very few developments have been approved in the green belt, with the exception of 1995 when 34 units were re-approved (Table B.11).
loss of greenery in towns, including trees, shrubs and greenery in private gardens	Loss of greenery is a problem in residential areas. The EARA report indicates that, in terms of effects on environmental character, the loss of trees and landscaping is the third most important issue to Harrow's residents (Wooten Jeffreys, 1989). Although trees are seen as the most important element in the character of residential areas. Harrow has 181,935 trees, constituting 35.8 trees per hectare, a mean density of 0.38 stands per hectare (Table C.34). Urban intensification had, undoubtedly, had an effect on this number over the study period, especially in backland development where trees had been removed from large gardens. But planners thought that this trend was manageable through a programme of monitoring, replacement and stronger protection policies, which are now in place.
loss of ecologically important open space and habitats in towns due to more intensive development	As stated above, Harrow has been especially good at protecting open land and has actually gained 6% more open land since 1971 (Table C.31). However, there may have been unaccounted losses of habitats on scrub land or derelict land. Also the loss of back garden habitats was seen as a problem, but these losses were offset by the better management and increased status of green chains in the borough; they constitute 6,100m in length, some 20 hectares (Table C.26). Overall, awareness of the value of ecologically important land by the LPA has meant that losses have been kept to a minimum.
improvements in air quality caused by trip reductions	There is no mention of air pollution in the local development plans, and no monitoring of it by the LPA. However, the London Air Quality Network (LAQN) has reported incidents of carbon monoxide above standards suggested by the Expert Panel on Air Quality Standards in Harrow and adjacent boroughs, suggesting that heavily trafficked roads are causing air quality to be below accepted standards in London (LPAC, 1995).
more opportunities for CHP due to higher housing densities	Harrow has five community heating schemes serving 115 dwellings (Table C.36). Higher densities helped to facilitate these schemes.

positive effect on the local built and natural environment brought about by upgrading due to new buildings and high quality design	Environmental upgrading has occurred in some of the district and local centres. However, in suburban areas the overwhelming perception is that new development had downgraded the areas by increasing their densities and altering the previously spacious suburban character.
more environmental wear and tear due to increased numbers of people	It is very difficult to assess environmental wear and tear. The planners thought there was an obvious deterioration in infrastructure and that some district centres were suffering from environmental wear, but thought that good management was overcoming these problems. Overall, they did not think this was an important issue in Harrow.

### 6.4.8 Evaluation of economic policies in Harrow



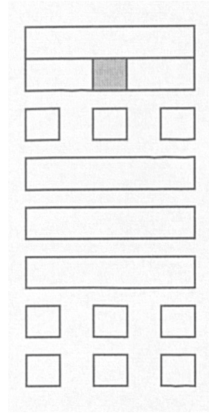
**Table 6.4 Evaluation of economic policies in Harrow**

objectives-achievements					assessment of impacts		
policy and objective	low	med.	high	comment	economic	quality of life	environment
The council will encourage offices to locate in the existing district and local centres to help these centres provide integrated shopping and transport facilities, so that workers have access to retail and transport facilities.		•		Total amount of floorspace approved has decreased over the study period, but the LPA has located most new development in existing centres.	+ vitality and viability + access to office employment + planning gain - increased travel costs because more traffic at peak times + cheaper travel costs for those who live nearer their work	+ facilities in centres + access to services for office workers - increased traffic congestion at peak times + more public transport services - public transport (buses) overcrowded and slow due to congestion	- increase in car use for travel to work + no commercial development in green belt - air quality unacceptable due to traffic concentrations in centres at peak times + centres upgraded by new developments
The council will encourage and protect shopping uses in the existing district and local centres to safeguard their vitality and viability and maintain the existing distribution of centres and the diversity of functions within them.		•		Most new retail has been allocated in existing centres, but an out-of-town superstore was allowed on appeal.	+ vitality and viability + access to retail employment + planning gain - increased travel costs because more traffic at peak times + cheaper travel costs for those who live nearer their work	+ facilities in centres + access to shops - increased traffic congestion around centres + more public transport services - public transport (buses) overcrowded and slow due to congestion.	- increase in car use to centres and to out-of-town store - air quality unacceptable due to traffic concentrations in centres at peak times + centres upgraded by new developments (funded partially through planning gain)

<p>Harrow town centre will be promoted as the borough's strategic centre. It will be the focus for major new retail development and the council will seek to improve its accessibility and attractiveness. This will maintain the vitality and viability of the centre.</p>			<ul style="list-style-type: none"> <li>•</li> </ul>	<p>A major new shopping centre, 'St George's', was permitted in Harrow town centre, and environmental improvement schemes have helped increase the centre in national rankings.</p>	<p>+ vitality and viability  + private travel costs for those who live nearby  - travel costs for road users, congestion around centre is worse  + access to retail employment  + planning gain</p>	<p>+ facilities  + accessibility to services and facilities  - traffic impacts  + public transport, more services  - public transport, buses overcrowded and slower due to congestion</p>	<p>- more car commuting  + countryside protected  - air quality is unacceptable due to localised traffic congestion  + upgrading town centre</p>
<p>Industrial and warehousing uses will be retained and encouraged in the borough in existing industrial areas and any under used land in these areas will be quickly redeveloped for similar uses. This should improve the employment opportunities and match jobs with skills in the borough.</p>	<ul style="list-style-type: none"> <li>•</li> </ul>		<p>The LPA have not managed to significantly increase the amount of warehousing and industrial floorspace. But the new development that has taken place has been located on sites in compliance with this policy.</p>	<p>+ access to employment</p>	<p>- some bad neighbour effects from light industrial uses</p>	<p>+ use of derelict land</p>	



#### 6.4.9 Evaluation of quality of life policies in Harrow



**Table 6.5 Evaluation of quality of life policies in Harrow**

objectives-achievements					assessment of impacts		
policy and objective	low	med.	high	comment	economic	quality of life	environment
The council will consider favourably applications to convert or extend housing so as to provide dwellings of an appropriate size and type for Harrow's residents.			•	The LPA have not been unduly restrictive, and housing needs have been met in the borough.	+ house value increased for owner - negative affect on house prices when cumulative development leads to a change in character of that area	+ increase in private internal space	- loss of private garden space - some loss of habitats
The council will refuse applications for change of use from residential to non-residential uses to resist the loss of housing in the borough.			•	There were relatively few applications for changes of use from residential uses, and these have mainly been refused.		+ better facilities as there are more people to support them	

<p>The council will seek the provision of 4,500 additional units between 1987 and 2,001 on sites designated in the development plans to provide suitable housing to meet the needs of Harrow residents.</p>		<ul style="list-style-type: none"> <li>•</li> </ul>	<p>Housing targets have been met, but over the period the location of housing has been controversial. There are, however, no significant housing shortages.</p>	<p>+ vitality and viability as more people to support local economy  - house values decrease where areas are 'crammed'  - private travel costs increased due to increased congestion  + access to employment when homes near jobs  + some planning gain on larger developments</p>	<p>- reduction in average house sizes  + accessibility to housing  + facilities as more people to support them  - some facilities reaching a capacity  + accessibility to services and facilities  - increase in traffic problems  - social interaction  - some bad neighbour effects from domestic sources  + more public transport services  - public transport overstretched on some routes at some times</p>	<p>- increased traffic  + protection of the countryside  - loss of greenery in urban areas  - some losses of habitats  - air quality from traffic volumes and concentrations  + more CHP schemes provided  + centres upgraded  - suburban character damaged</p>
<p>The council will try to meet density standards as set out in the development plans. The standards are higher for non family housing and for dwellings in, or near, centres which are well serviced by public transport and near open space and other facilities. This should help to provide good standards of development and meet the housing needs of the borough's residents.</p>		<ul style="list-style-type: none"> <li>•</li> </ul>	<p>The LPA have managed to implement standards in the plans, but these have effectively been reduced over the period. The LPA have not managed to achieve higher densities on strategic sites.</p>	<p>+ access to employment for new residents  + planning gain</p>	<p>- reduction in private space  + access to housing improved  + facilities supported  + better accessibility to services and facilities  - impacts of traffic are severe, parking problems etc.  - social integration poor, dislike of new residents  - bad neighbour effects from new domestic sources</p>	<p>- increase in traffic  + protection of the countryside  - loss of greenery  - some loss of habitats  + more CHP schemes provided  + effect on built environment when designs are good  - effect on built environment when designs are of a poor quality</p>

<p>Within strategic, district and local centres, redevelopment schemes involving the demolition of residential units should provide at least the same number of residential units. This will retain accommodation in town centres and maintain their liveliness. It may also help meet the needs of smaller households.</p>			<ul style="list-style-type: none"> <li>•</li> </ul>	<p>Almost all redevelopments in the period have resulted in increases in the number of units on any particular site. A high proportion of new houses were smaller units.</p>	<p>+ access to employment for new residents + planning gain</p>	<p>+ access to housing improved + facilities supported + better accessibility to services and facilities - impacts of traffic are severe, parking problems etc. - social integration poor, dislike of new residents - bad neighbour effects from new domestic sources</p>	<p>- increase in traffic + protection of the countryside - loss of greenery - some loss of habitats + more CHP schemes provided + effect on built environment when designs are good - effect on built environment when designs are of a poor quality</p>
<p>Entertainment and leisure facilities should be encouraged to remain in district and local centres to contribute to meeting overall leisure needs and to maintain the quality, use and accessibility of such facilities.</p>			<ul style="list-style-type: none"> <li>•</li> </ul>	<p>Both D1 and D2 major applications were kept within existing centres.</p>	<p>+ vitality and viability + access to employment in entertainment and leisure sectors + planning gain</p>	<p>+ facilities + access to facilities and services - some bad neighbour effects</p>	<p>+ protection of the countryside + effect on the built environment, upgrading in centres</p>

#### 6.4.10 Evaluation of environmental policies in Harrow

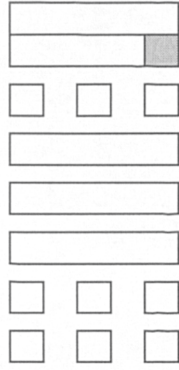


Table 6.6 Evaluation of environmental policies in Harrow

objectives-achievements					assessment of impacts		
policy and objective	low	med.	high	comment	economic	quality of life	environment
Keep land in the green belt primarily open in character to limit urban development and preserve valuable agricultural land.		•		In most years the number of applications in the green belt was small and did not lead to increases in floorspace. There was one exception when 34 houses were permitted through a renewal of an existing application.	+ vitality and viability of centres + accessibility to employment for the majority of workers	+ access to facilities for all + public transport access	+ protection of the countryside - some loss of greenery and habitats in urban area + upgrading of centres - some 'cramming' in suburbs
The council will require a high standard of design and layout in new developments including parking, garden size and open space provision which meet the council's standards. This should ensure high standards in the built environment and contribute to environmental character.		•		Residential developments early in the period were seen to have a very negative effect on environmental character. Since policies were strengthened design and layouts have improved.	- house prices reduced early in the period due to poor design and layouts + house prices increased later due to improved design	+ space standards and amenity in new buildings improved	- loss of greenery early in period + greenery provided in new developments - effect on the built environment early in period, especially in the suburbs

<p>The council will use its statutory powers to pursue the improvement of sites in the borough which are detrimental to the amenities of the borough to improve the appearance of any vacant sites.</p>			<ul style="list-style-type: none"> <li>•</li> </ul>	<p>There is now only 0.1 ha. of land in Harrow which is classified as derelict.</p>			<p>+ environmental upgrading</p>
<p>New developments, especially those which generate employment, will be located in existing centres so as to encourage fewer journeys to work by car and more use of emissions efficient modes such as public transport.</p>		<ul style="list-style-type: none"> <li>•</li> </ul>		<p>The LPA were successful in locating transport generating developments in existing centres, but this did not lead to reductions in traffic.</p>	<p>+ vitality and viability + access to employment</p>	<p>+ facilities + access to facilities - more traffic + more public transport services - public transport overstretched</p>	<p>- more car commuting into centres at peak times + protection of the countryside - localised air quality problems + built environment upgraded in centres</p>

### 6.4.11 Findings of the implementation study in Harrow

The review of the implementation debate in Chapter Five concentrated on how central policies are/are not embodied in local plans, and use of plans in decision-making processes in development control. It reviewed possible changes in the planning system which may aid the implementation of intensification policies, such as the use of indicators, capacity approaches, new organisational structures and new decision-making responsibilities. The information on Harrow focuses on these issues too, and also presents new issues which arose from the case study.

An analysis of whether national, regional and London-wide policies had been included into Harrow's development plans was undertaken. Although few policies would be expected in the Harrow Local Plan, as it was adopted before many of the national changes in policy, there should be a relatively broad inclusion of policies in Harrow's UDP, as this was adopted in 1994. The UDP contains wide coverage of sustainability issues covered in national guidance, and was updated between consultation and adoption to ensure that the most up-to-date thinking on sustainability was included. Yet, although the sustainability message is strong, the corresponding local policies do not match the commitments. The UDP is especially weak on PPG13-type policies (DoE and DoT, 1994). Overall, the tone of the plan is extremely protectionist. It aims to preserve the local environment and the character of existing residential areas. It does contain policies on aspects of intensification which are less controversial, for example concentrating shopping and employment uses in existing centres. But any local policies concerning infill, higher densities and so on are always well worded so as to leave room for a protectionist interpretation.

In particular, local policies developed in the late 1980s and early 1990s to protect high quality residential areas are anti-intensification. The Environmental Assessment of Residential Areas ([EARA] Wootten Jeffreys, 1989) was used as justification for refusing new developments in certain neighbourhoods. The LPA had been losing appeals for housing in these areas and felt it required a stronger basis upon which to argue issues of cumulative impact and environmental character. Therefore, the report was commissioned and policies were developed from it, and published as interim development control policies. These policies have now been incorporated into the UDP and provide an empirical basis on which to fight appeals. These policies have been extremely popular with the borough's residents. The UDP does incorporate messages about environmental sustainability, but what is presented is a very localised version of the concept. Policies are concerned with retaining green and open space in the borough and maintaining local environmental resources.

It is interesting to note that all the councillors interviewed interpreted the UDP as either neutral or discouraging in its attitude to intensification. Although they did draw attention to the LPA's aim to increase densities in the centres, they thought the reason for this was to relieve

development pressure in the suburbs, rather than promote any wider benefits. One councillor called UDP policies to increase density 'a gesture towards government guidance'.

On the question of whether the intensification policies which are in the local plan are being translated through the development control process, the evaluation shows areas of policy success, but also some policy failure. For example, policies to concentrate retail and employment uses in existing centres were successful, and the impacts were mainly positive. The most significant policy shortcomings were in increasing densities and encouraging the use of more energy-efficient modes of transport. Increasing densities was very unpopular with local councillors and local residents. One of the planners interviewed explained how the members use back garden length guidance standards to control densities. This standard has been increased during the case study period from 10m to 15m. Councillors were very unlikely to allow any applications to be granted which do not comply with this guidance. Even house extensions were judged by the same standards. The planner felt that these numerical standards were used more rigidly than those which required qualitative judgements. However, at appeal, inspectors only used the standards as guidance (they are included in supplementary guidance), but members use them in every relevant case. The planners reported that national policy on increasing densities is often over-ridden by members.

Although the councillors have an understanding of sustainability arguments, they apply them at a very local level to preserve the status quo. For example, parking standards are still adhered to, even though the committee agreed in principle to reduce them in town centre sites. The first proposal for a higher density development, which the planners believed acted as a test case, was refused permission, due to inadequate parking space. This was seen as a step backwards by the planning and transport sections. This kind of decision is unsurprising, considering that most councillors could not ever recall having heard arguments that urban intensification is sustainable used by planning officers when giving advice on planning applications at committee; planners dispute this.

The planners interviewed thought that even though, on paper, there was beginning to be a move towards sustainable development and thus urban intensification, this got fine-tuned during the UDP adoption process and then diluted even more during development control. For example, policies were included in the consultation UDP to increase numerical density standards, but these were changed during UDP revisions so that in the final version the new density standards apply only to Harrow town centre. Now these are not implemented there, even when the officers recommend approval. As one planner said, 'the UDP picks up threads of national policy, but the members often back down on decisions.'

Turning to the role of elected members, the interviews revealed varying attitudes to intensification policies and their use. First, the councillors had mixed opinions as to whether urban intensification arguments are important and whether they would consider them when

making decisions on applications. Several councillors argued that reducing car journeys is a key priority and that, for example, the trend for out-of-town shopping is unsustainable, but others argued that these strategic arguments are outweighed by policies aimed at preserving the suburban character of the area. It was interesting that one councillor commented that intensification policies were not really relevant to a place like Harrow, and should be focused in inner urban areas where densities are already high.

Both planners and councillors felt that there was strong opposition to intensification policies by local residents. Policies which came from the EARA exercise have been very successful in stopping intensification and backland developments and therefore continue to have a great deal of public support. Councillors drew attention to the fact that the people who live in these types of area are more likely to be vociferous and take part in public consultation as they are often well-educated home owners who are very concerned about protecting their investment. Another councillor drew attention to the related problems of introducing affordable housing into wealthier areas, reporting that existing residents were often opposed to this type of development. A dislike of new uses, such as light industry in residential areas was also reported. The planners reported that the overall perception of residents and councillors is that the borough is 'full'.

Turning to the issue of whether any new tools, working structures or decision-making processes are needed, it was clear that the planners had strong opinions on these subjects. They felt that dealing with sustainable development through development control was very new in planning and that those implementing it were only just beginning to get to grips with it. They believed that new tools might be useful, and cited sustainability indicators and rankings as possible ways forward. However, as yet, these are not used in Harrow. The planners were sceptical about previous attempts at capacity approaches on the grounds that they had been hampered by a lack of good information. In particular, one planner thought that they had no way of predicting how small-scale developments add up to changes in the built fabric. This discussion led the planners to argue that one of the main barriers to implementing sustainable development policies of all types is a lack of monitoring or knowledge of existing circumstances. The range of analyses needed to deliver sustainable development was not done in Harrow because of financial and time constraints.

On the issue of changes to decision-making structures, the planners thought that until people grasp the wider claims about the environment, and realise that there has to be some change, then local NIMBY attitudes will prevail. These attitudes, they argued, can be very destructive, as they often embody deep social problems, such as a dislike of different types of people, and include, at the extreme, racist opinions. As one planner argued, if these sorts of value are asserted through the planning system, then that is unacceptable. However, to give the status of law to an obligation to consider particular sustainability issues, they felt, would be almost impossible to implement, and too hard to monitor.



Other issues which came to light during discussions focused on the difficulty in realising significant changes in a borough which has hardly any developable land and where, as in most places, changes in the building stock are actually very small compared with the extent of the existing stock. Furthermore, one planner commented that implementation problems were entrenched in planning culture because instead of being bold and forward-thinking, planners are often left 'watching their backs' and defending their policies to the local population. However, the biggest problem in Harrow is probably that those making decisions, i.e. councillors, do not believe that intensification policies apply to their borough.

# Camden

### 6.5 Camden: Introduction

Camden is an inner London borough with a population of 185,000. After 70 years of decline, its population is now projected to increase (London Borough of Camden [LBC], 1992). There is also a projected increase in household numbers. As in other boroughs, this is mainly due to an increase in smaller households. 200,000 people work in Camden, mostly in the service sector. The business and public service sectors provide work for 125,000 employees in Camden (*op cit.*). Most of Camden's employment is concentrated in two wards, Bloomsbury and Holborn.

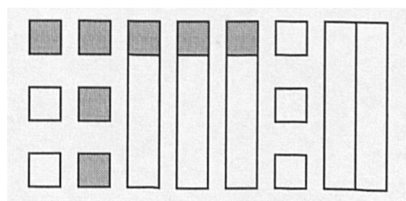
The borough is home to numerous activities of metropolitan and international significance, such as the British Library, the University of London, Channel Four and Thames Television, Euston Road and King's Cross stations (*op cit.*). The borough is densely populated (78.62 persons per hectare [DoE, 1993]) and has a highly mixed pattern of land uses. It is a very desirable borough for residential and employment developments because of its high accessibility to so many of London's strategic transport and business facilities.

The development plans which cover the study period are the *Camden Borough Local Plan* (LBC, 1987) and the *London Borough of Camden Unitary Development Plan* (LBC, 1992, supplemented by proposed amendments, 1996a). As yet the UDP has not been adopted. The first draft was produced in 1992 and its policies have been used by planners since then in the expectation of adoption some time in 1998. No special incentives and controls relevant to urban intensification policies were identified.

#### 6.5.1 Urban intensification policies and objectives in Camden

Urban intensification policies and objectives covering the study period in Camden are shown in Tables E.4, E.5, and E.6 (Appendix E). The UDP (LBC, 1992) states that comprehensive monitoring of the plan will be undertaken. The monitoring data that is available does not live up to the high standards set in the UDP. The main sources of data used here are annual returns of applications granted (Table B.2). These cover housing, office and retail uses, of 10 units or more for housing and 1,000 m.sq. for other uses. Other more detailed data on applications is not available. Trends resulting from these applications, however, are discernible from a number of sources and these are referenced in the text (Appendix C). Interviews with planners undertaking monitoring and policy development were also used to fill in any gaps.

#### 6.5.2 Development control decisions and the subsequent development patterns and trends relating to urban intensification policies with economic objectives in Camden



- **The council will bring vacant land back into use for employment purposes to help improve the economy of the borough and deal with causes of inner city decline**

The main employment for Camden's residents is in hotels, catering, entertainment and retail. Next, a large proportion work in offices - twice as many as work in manufacturing (LBC, 1992). Therefore, if the LPA is looking to improve employment prospects for local people, then more offices, entertainment and retail developments may prove most beneficial. This may help address the mismatch between residents' skills and the highly specialised businesses and services in the borough which attract employees from other parts of London.

Office development was most active in the late 1980s, peaking in 1990 with 276,521 m.sq. of floorspace gained (Table B.2). For the last two years, 1995 and 1996, it has averaged around 77,000 m.sq. Retail, on the other hand, has seen its highest approved floorspace, 16,147, in 1996. In all other years (1988-1995) around 5,000 m.sq. was approved, with the exception of 1991 and 1992, when only 1150 m.sq. and 0 m.sq. were allowed.

It appears that Camden is fairing relatively well in finding land for employment purposes, and some major new redevelopment schemes in the area indicate there is scope for more. However, most of these increases have been through re-development rather than development on derelict land. Camden still has 9.0 hectares of land classified as derelict by the DoE (Table C.32), and at least double this amount is disused and awaiting redevelopment. Whether the increases in employment uses have helped to deal with the causes of inner city decline is hard to say. Camden still has relatively high unemployment rates. The 1991 census showed that almost 16% of males and 11% of females were unemployed and this situation has only improved slightly over the period since then (Tables C.7; C.8). Many of the new employment opportunities were for skilled people who live outside the borough, although 49.2% of Camden's economically active residents also work in the borough (Table C.10).

- **The council will allow extensions of existing retail units to meet the high level of retail demand.**

There are no data on floorspace gained through extensions, but the LPA recorded that there were no significant problems in implementing this policy.

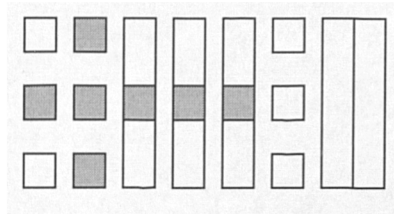
- **All large developments over 2,000 m.sq. must be sited in, or adjacent to, one of five centres, to improve vitality and aid other retailers.**

There were no large new retail developments in the borough over the study period. However, an application for a major new development at King's Cross has just been approved, which will include retail. This is located near good transport routes, but outside the centres specified (Table B.2). Smaller developments have been directed to existing centres during the period.

- **The council will encourage the consolidation of the hierarchy of centres and improvement of shopping and service centres to encourage retailers and service providers to stay in the borough.**

This policy has been successfully implemented, with most of the 48,721 m.sq. of new retail floorspace being located in or adjacent to existing centres (Table B.2). The council had been less successful in improving shopping and services centres directly e.g. through management schemes or urban design, due to lack of resources. Furthermore, Camden Town dropped 89 places in national rankings between 1984 and 1995 (Hillier Parker, 1996). This may be slightly misleading, as tables are composed on a count of multiple retailers and Camden Town is known primarily for its variety and quality of independent shops.

### 6.5.3 Development control decisions and the subsequent development patterns and trends relating to urban intensification policies with quality of life objectives in Camden



- **The council will retain land and buildings in residential use to increase the quality of dwellings and meet the needs of the existing and future population.**

The council has managed to retain housing land and buildings, with no major losses in the study period. However, there is still a high level of housing need in the borough, as evidenced by figures of homelessness and the inadequately housed (LBC, 1992; 1994). 18% of all households in Camden are in housing need. The most desperate need is for homes for two adults with two or more children, but lone parents are also in need. This shortage of housing is exacerbated by a mismatch between the size of households and accommodation provided. There is an unusually high demand for larger units, probably because they are so expensive to buy or rent in Camden. House prices are considerably higher in Camden than in Greater London as a whole, in fact only Westminster is more expensive (LBC, 1992).

- **The council will encourage the fullest use of the existing residential accommodation to meet housing needs.**

The council has continued to permit conversions and subdivisions of houses to meet housing needs. They have also helped to secure good quality housing in multiple occupation (HMO) by enforcing standards on space and facilities (LBC, 1992 and supplementary amendments 1996). However, the borough also has a relatively high level of vacant dwellings. 5.9% of the stock (5,467 dwellings) was vacant in 1994 (Table C.23).

- **The council will increase the amount of land in residential use, subject to environmental policies, and make the fullest use of all vacant and under-used sites, to meet the housing needs and make good use of under utilised land.**

The 1990s have seen an upturn in housing completions and applications. In all, 1680 units have been provided in applications for 10 or more units since 1990 (Table B.2). At least that number again have been provided through smaller sites, conversions and subdivisions. Nevertheless, LPAC's housing provision study (1992-2006) predicts that there is still room for more growth (LPAC, 1994b). Most new units, they believe, will be provided through conversions (6,001) with 3,048 on large sites and only 653 on small sites (Table C.21).

- **The council will achieve a maximum density on any site (i.e. acceptable for that site - minimum 70 hra, maximum 100 hra for family housing, maximum 140 hra for non-family) to increase the quality of dwellings and meet the needs of the population. Higher densities may be permitted in easily accessible areas located adjacent to public transport facilities where surrounding density is high. Densities are raised in the 1992 consultation document to 175 - 210 hra near public open spaces and where there is a need for affordable housing.**

The LPA has managed to achieve higher average densities in new developments because councillors accept that there are severe housing shortages in the borough. Although, as stated above, there are still housing needs and problems. The LPA have also made some progress on increasing densities near transport facilities, and car-free housing is being introduced in some such locations. 90% of Camden's population live within 400m of basic services such as food shops, indicating very high levels of accessibility to basic needs (Table C.19).

- **The council will seek residential floorspace in mixed-use schemes for redevelopment to help meet the housing needs of the population.**

Residential floorspace in mixed-use developments has proved very hard to achieve. The UDP policies on mixed-use were changed by the inspector during the UDP enquiry process because they were seen to be too restrictive. Planners are now having problems in enforcing the new policy. Instead of insisting on residential units in mixed-use schemes, the LPA is now usually settling for planning gain, often to provide affordable housing elsewhere in the borough.

- **The council will encourage a change of use to residential uses in existing non-residential, under-used buildings, to help meet housing targets.**

Camden has been one of the few boroughs to have successfully implemented a policy of converting non-housing uses into housing; for example, the LPA has permitted a number of

office-to-flats changes of use. This trend is now slowing, perhaps, as one planner suspected, due to high demands for planning gain, which are acting as a tax on development.

- **The council will ensure development which attracts a significant number of trips is located in areas of high public transport accessibility, and oppose developments and land use changes that disadvantage the provision of public transport, or lead to increases in private car use. This will ensure that conditions do not worsen for the transport disadvantaged, improve accessibility and ensure that energy-efficient modes of transport are desirable.**

Planners reported that it had been difficult to implement this policy, because the planning system is simply reacting to the market and cannot always guarantee that sites which they would like to see developed will be desirable to developers. But, where possible, they have used this policy. However, they feel that overall development patterns are already fixed, and that it is difficult to make real advances. There are some positive examples, such as the redevelopment of King's Cross which is to be a mixed-use scheme in a highly accessible location.

- **The council will permit extensions to shops within the designated centres to maintain their vitality and ensure residents have easy access to shopping centres and a choice of facilities.**

As stated above, the LPA has been successful in permitting extensions to retail in existing centres. Furthermore, residents in Camden believe that shopping facilities, more than any other issue category, have been improved due to urban intensification (DETR, forthcoming). Recreation facilities were also seen to have been positively affected.

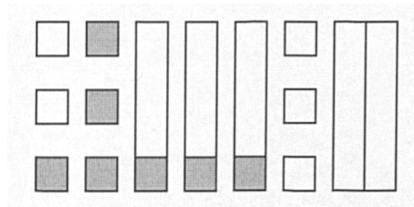
- **The council will encourage employment uses to be directed to areas of high public transport provision to reduce the impact of traffic on the local population.**

The LPA has managed to comply with this locational policy (see above), but the effect on travel patterns must be disputed. Car use has increased over the study period, underground use has risen slightly, and bicycle use and walking dropped sharply in the late 1980s and early 1990s and have still not recovered to early 1980s rates (LBC, 1996b). Although travel modes seem more equally shared than in other boroughs (i.e. 170, 000 work trips are made daily by car, and the same amount by bus, Table C.39; C.40), the fact that the borough is so highly populated, and so many trips are made, means that traffic congestion is still very severe. Furthermore, the local population still seem very concerned about the impact that traffic has on their lives. The top five issues harmed by intensification in Camden in the DETR study were parking (reported by 87% of respondents), traffic (87%), air pollution (82%), noise (69%) and road safety (63%) (DETR, forthcoming).

- **The council will permit tourist related activity in three defined areas where public transport accessibility is good to improve the vitality of these areas and increase accessibility to tourists and locals.**

Tourism is an important part of Camden's economy and identity. Over the study period the LPA has attracted tourist related developments to locations which are accessible by public transport. However, in some other locations the planners believe that these policies have been a victim of their own success. For example, the Camden Lock weekend market is now one of London's top five tourist attractions, but the large number of visitors means that public transport is overstretched, sometimes to the extent that the tube stations have to be temporarily closed whilst the backlog of people is cleared.

#### **6.5.4 Development control decisions and the subsequent development patterns and trends relating to urban intensification policies with environmental objectives in Camden**



- **The council will permit high density development close to public transport interchanges to reduce the need for travel by private motorised modes of transport.**

The LPA has managed to implement this locational policy when opportunities have arisen, although planners admit that rates of change are slow. However, the influences which such policies have had, or will have, on traffic patterns in the borough are less clear. Patterns of car trips within the borough are complex. Over the study period some routes have experienced increases in traffic flows and others have seen reductions. Also, although peaktime numbers of cars have remained relatively stable, high levels are present for longer periods of the day (LBC, 1996). Such patterns mean that it is very difficult, overall, to gauge satisfactorily any discernible improvements. What is noticeable, is that total car journeys still account for as many trips as buses, and far more than train and motorcycle work trips, even in a borough with low car ownership rates (only 43% of households have access to a car) and very good public transport accessibility (*op cit.*).

- **The council will initiate and support schemes to use derelict or unused land to improve the quality of the environment and make the most of land as a resource.**

As stated above, 9.0 ha of land in Camden fits the DoE's definition of derelict land, and this has been earmarked for redevelopment (Table C.32). Therefore the policy has been relatively



successfully implemented. There are, however still some sites which are disused but not classed as derelict, which could be developed.

- **The council will promote an increase in energy efficiency and the sustainable use of land and resources to ensure individual decisions are taken in an environmental framework which reflects environmental policies (including global warming). This includes considering the energy-efficiency potential of all developments in reducing traffic and encouraging the use of CHP.**

The LPA is trying very hard to increase awareness of sustainability issues in the borough. It is introducing a new co-ordinated transport scheme in the near future and is attempting to increase interest in LA21. It is also a member of the Europe-wide Healthy Cities Project. However, the planners felt that it was too early to make judgements on the success of sustainability policies in general, as they take some time to implement. Although some advances are already being made. For example, the borough has one of the highest numbers of community heating schemes in London: 142 schemes covering 13,141 dwellings (Table C.35).

- **The council will locate trip generating developments in areas of high public transport accessibility to help tackle the serious environmental problems facing the borough, e.g. air pollution and the negative effects of traffic congestion.**

Although the LPA has had some success in locating development near transport nodes, noticeable effects on the environment have not been reported. Pollution was mentioned by 82% of Camden residents in the DETR survey (forthcoming) as having been negatively affected by intensification. In LBC's own survey, 25% of Camden's residents stated pollution was one the main problems in the borough, and 44% said it was the worst environmental problem (LBC, 1994).

## 6.5.5 Economic impacts of intensification in Camden

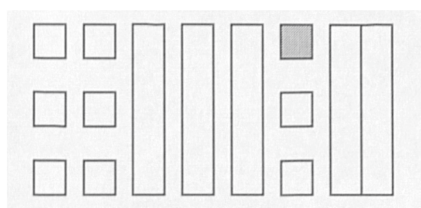


Table 6.7 Economic impacts of intensification in Camden

Impact	Evidence of impact
improved vitality and viability of centres due to higher population densities which provide a critical mass to support businesses, and because planning policies are reducing competition from out-of-town developments	Planners thought that consolidation policies had helped to improve the vitality of existing centres. However, Camden town centre dropped 89 places in Hillier Parker's (1996) ratings of town centres in the UK, although, as stated above, this may be misleading due to the fact that the national ranking is based on multiple retailers and Camden has many new independent traders. The total number of VAT-registered businesses in the borough has increased over the period from 13,610 in 1981 to 16,044 in 1994 (Table C.16). Planners thought that many businesses had located in centres, above shops and in new centrally-located small workshops.
benefits to the LPA in terms of cheaper infrastructure provision	There is no choice of greenfield sites in Camden, as it is an inner London borough, so no comparisons could be made between urban and greenfield infrastructure costs.
house prices may increase if the area is improved due to intensification	Planners believed that the housing market in Camden is very localised and all property is very expensive, no matter what other development there is nearby (Camden is the second most expensive borough in London).
reduced private travel costs to businesses and residents because trip lengths are reduced and traffic volumes reduced	Average speeds are slower in Camden now than they were at the beginning of the period, so it is taking people longer to travel the same distances (LBC, 1996b). Traffic congestion was identified as the main problem in Camden by 41% of the population (LBC, 1994). In the DETR research into intensification, 87% of the sample of Camden's population thought that intensification had made traffic congestion worse (DETR, forthcoming). Therefore it is unlikely that any reductions in travel costs have been achieved.
higher housing costs because infill housing is more expensive to produce than greenfield housing	Not relevant in Camden because there are no greenfield sites.
higher maintenance costs, because infill increases wear and tear on the existing urban infrastructure	Maintenance costs in the borough are high. The planners thought that there was a connection between further development and higher maintenance costs and that the large numbers of people working in and visiting the borough also put a strain on maintenance.
improved access to employment for urban residents because homes located near workplaces	The DETR research found that 17% of its sample of Camden's residents thought that job opportunities had improved due to intensification (DETR, forthcoming). The remainder thought there was no effect. Unemployment has dropped slightly over the period, but is still high (Tables C.11; C.12; C.13). 49.2% of Camden's economically active population work within the borough (Table C.10). There is still a mismatch between the jobs which are provided in the borough and the skills of local unemployed people.

fewer opportunities to secure planning gain because infill developments are usually smaller than those on greenfield sites

The LPA has been very successful in obtaining planning gain due to high land prices and some very large commercial schemes, although planners feel that this may now be coming to an end, as they are losing development to other boroughs with lower planning gain demands.

## 6.5.6 Quality of life impacts of intensification in Camden

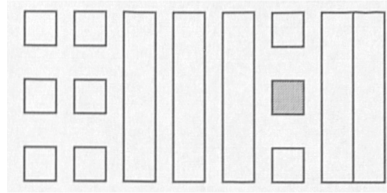


Table 6.8 Quality of life impacts of intensification in Camden

Impact	Evidence of impact
reduction in private space - smaller houses and smaller gardens, or no gardens	New houses are, on average, smaller than the borough's average, and fewer new houses have gardens. But in such an expensive borough, these smaller units are seen as meeting the needs of the population, especially for smaller households, although there is a need for larger affordable units (LBC, 1992).
better facilities because there are more people to support them	Camden is very well provided with cultural facilities, representing the borough's place as one of the centres of culture in the UK. For example it has 26 theatres, 13 libraries (including the British Library) and five sports centres (Table C.24). The high population densities do support local facilities, and there are many restaurants and clubs, but they are also heavily patronised by visitors from outside the borough. However there are still considerable shortages in facilities, as the UDP recognises (LBC, 1992 and 1996a). 17% of people in Camden said there was a lack of leisure facilities (LBC, 1994). But the DETR research reported that 42% of people thought that shops had improved due to intensification and 19% that facilities had improved (DETR forthcoming).
safer centres due to increased numbers of people in the public realm - better natural surveillance during the day and night	There are mixed views about arguments that increased numbers of people mean that there is less crime or that fear of crime is reduced. Camden does have a problem of actual street safety and perceptions of it, due to the increased numbers of highly visible homeless, rough sleepers and drug users. 31% of Camden's population thought that crime was the main problem in Camden (LBC, 1994).
improved accessibility because services and facilities are more localised and can be reached by a variety of modes of transport	Accessibility in Camden is good and has improved over the period due to consolidation policies and increased public transport provisions. 90% of people live within 400m of a food shop (Table C.19).
reduced traffic and thus traffic related problems due to transfers to less environmentally damaging modes of transport, including public transport, walking and cycling	As stated above, traffic problems are a major issue in Camden and there is no proof that intensification policies have helped (LBC, 1996b). A major sustainable transport scheme is being implemented in the near future. 87% of Camden's residents thought that parking had got worse due to intensification, 63% that road safety had got worse, 69% that there was more noise. In fact the top five issues reported to have been affected negatively by intensification were all related to traffic (DETR, forthcoming).

<p>reduced access to open space due to open land being used for development</p>	<p>Within Camden there is 302 ha. of MOL, all of which is accessible to the public (Table C.28). Also, a surprisingly high 26% of the borough is covered by areas with nature conservation designations (Table C.29). The amount of accessible public open land has increased in the borough by 3% since 1971 (Table C.31). The UDP recognises that there are still localised deficiencies, but there is very little scope for new open land (LBC, 1992). The LPA advocates temporary greening schemes on disused land until it is developed.</p>
<p>neighbourhoods more socially integrated, more social cohesion and better social conditions generally because of increased numbers of people</p>	<p>The borough is characterised by a diverse mix of people. Many people surveyed for the DETR survey reported that they were attracted to live in Camden because of its cosmopolitan make-up (DETR, forthcoming). 20% of the population are Afro-Caribbean or Asian, 17% are from Ireland, the rest of Europe, North America or Australia and New Zealand (LBC, 1992). 11% of residents thought that a benefit of intensification was that it improved neighbourliness; most of the other 89% thought that it has made no difference, with only a few thinking there were negative effects (DETR, forthcoming).</p>
<p>potential bad neighbour effects of mixed-use developments</p>	<p>Planners reported there are considerable bad neighbour problems with clubs and bars, and residents often complain. The highest number of noise complaints annually arise from residential sources, but those from commercial and entertainment uses are far higher than the average for London (Table C.17).</p>
<p>better public transport because of increased densities</p>	<p>The number of bus services has increased over the study period (LBC, 1996b) but, due to congestion, waiting times have increased on average too. 15% of the population thought that public transport had improved due to intensification, but almost the same percent thought it had got worse, because of overcrowding and delays (DETR, forthcoming).</p>

## 6.5.7 Environmental impacts of intensification in Camden

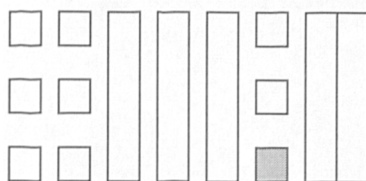
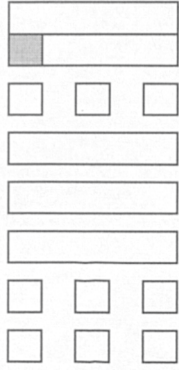


Table 6.9 Environmental impacts of intensification in Camden

Impact	Evidence of impact
reduced number and length of trips by modes of transport which are harmful to the environment, primarily the private car, and increases in other modes - walking, cycling and public transport	There is no evidence that intensification policies have reduced the number and length of trips by modes of transport which are harmful to the environment (LBC, 1996b). In fact, traffic volumes in the borough are increasing and average speeds reducing.
protection of the countryside and valuable rural land and green belt	Camden does not have any green belt land, so this is not relevant
loss of greenery in towns, including trees, shrubs and greenery in private gardens	There have been some losses of greenery due to intensification but the LPA is working hard to achieve soft landscaping in all new developments. Camden is, however, still surprisingly 'green'. There are 5,000 m. of green chain (Table C.26) and 76,549 trees, at a density of 35.26 per hectare - which is comparable with the leafiest outer London boroughs (Table C.34).
loss of ecologically important open space and habitats in towns due to more intensive development	There has been some loss of habitats through backland development and building on temporary rough green spaces, but this has been compensated by better management of protected areas (Tables C.26; C29).
improvements in air quality caused by trip reductions	The LAQN has reported incidents of carbon monoxide above standards suggested by the Expert Panel on Air Quality Standards in Camden and adjacent boroughs, suggesting that traffic is causing air quality to be below accepted standards in London (LPAC, 1995).
more opportunities for CHP due to higher housing densities	Camden has a very high level of CHP provision, facilitated by high residential densities. It has 142 separate schemes, covering 13,141 dwellings, and producing 311 million kilowatt hours (Tables C.35; C.36). The LPA is also looking into other forms of new environmental technology, such as better use of water run-off and energy-efficient building design (LBC, 1992).
positive effect of the local built and natural environment brought about by upgrading due to new buildings and high quality design	Environmental character was seen by Camden's residents to be the second most-improved element by intensification (DETR, forthcoming). 22% thought that intensification had improved environmental character, and most other residents identified no significant change. Those who thought it had been improved cited modernisation, good modern design and new buildings looking cleaner and making the area seem prosperous, although there were some comments about ugly modern architecture.

<p>more environmental wear and tear due to increased numbers of people</p>	<p>Environmental wear and tear is another major problem in Camden. In a survey (LBC, 1994) 38% of people thought that litter and dirt in the streets was a major problem. Dog mess, litter and cluttered pavements were all in the top 7 environmental problems. Planners agree that problems are bad because of increased activity, especially from people visiting and passing through.</p>
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### 6.5.8 Evaluation of economic policies in Camden



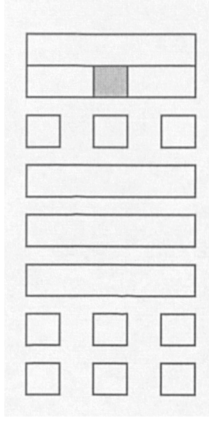
**Table 6.10 Evaluation of economic policies in Camden**

objectives-achievements				assessment of impacts			
policy and objective	low	med.	high	comment	economic	quality of life	environment
The council will bring vacant land back into use for employment purposes to help improve the economy of the borough and deal with causes if inner city decline.	•			Employment uses have been attracted into the borough, but they have been mainly re-developments and not new development on vacant land. These have provided jobs for people living outside the borough.	+ vitality and viability + access to employment	- some bad neighbour effects	+ upgrading through the development of derelict land
The council will allow extensions of existing retail units to meet the high level of retail demand.			•	The LPA had no problems implementing this policy and additions to retail floorspace have been made.	+ vitality and viability + access to retail employment	+ facilities + accessibility to facilities and services - some bad neighbour effects, especially food retail and take-aways	+ some modernisation, local environmental upgrading
All large retail developments over 2,000 sq.m. must be sited in or adjacent to one of five centres to improve vitality and aid other retailers.		•		The only major development in the period is at King's Cross, which although not one of the five centres identified, does have good transport access.	development not yet completed so no impacts identified	development not yet completed so no impacts identified	development not yet completed so no impacts identified



<p>The council will encourage the consolidation of the hierarchy of centres and improvement of shopping and service centres to encourage retailers and service providers to stay in the borough.</p>		<ul style="list-style-type: none"> <li>•</li> </ul>	<p>Most new development has been located in existing centres, but Camden Town still dropped significantly in national ratings.</p>	<p>+ vitality and viability  + private travel costs decrease for those whose proximity to services has improved  - private travel costs increased because traffic congestion is worse and travel slower  - higher maintenance costs  + access to employment</p>	<p>+ facilities  + access to facilities and services  - traffic-related problems, parking, road safety, noise</p>	<p>- more traffic  - air quality in centres is worse  + some centres upgraded and modernised  - increased wear and tear, litter, dirt etc.</p>
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### 6.5.9 Evaluation of quality of life policies in Camden



**Table 6.11 Evaluation of quality of life policies in Camden**

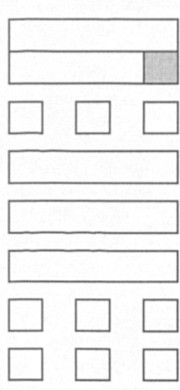
objectives-achievements				assessment of impacts			
policy and objective	low	med.	high	comment	economic	quality of life	environment
The council will retain land and buildings in residential use to increase the quality of dwellings and meet the needs of the existing and future population.		•		The LPA have managed to maintain land and buildings in residential uses, but there are still housing shortages.	+ vitality and viability due to maintaining population	+ facilities + access to facilities and services - traffic impacts, more parking on roads etc. + accessibility to housing + more public transport services - public transport overstretched	- more traffic - more environmental wear and tear, litter, dirt etc.
The council will encourage the fullest use of the existing residential accommodation to meet housing needs.		•		The LPA have permitted large numbers of conversions and extensions, but there is also a large number of empty dwellings.	+ vitality and viability due to increasing population	+ facilities + access to facilities and services - traffic impacts, more parking on roads etc. + accessibility to housing	- more traffic - air quality - more environmental wear and tear, litter, dirt etc.

<p>The council will increase the amount of land in residential use, subject to environmental policies, and make the fullest use of all vacant and under-used sites, to meet the housing needs and make good use of under utilised land.</p>	<ul style="list-style-type: none"> <li>•</li> </ul>		<p>The LPA have encouraged development on such sites and there is relatively little derelict land in the borough. However, there are still housing shortages.</p>	<p>+ vitality and viability due to maintaining population</p>	<p>+ facilities + access to facilities and services - traffic impacts, more parking on roads etc. + accessibility to housing + more public transport services - public transport overstretched</p>	<p>- more traffic - air quality + derelict and underused land fully utilised, so area upgraded - more environmental wear and tear, litter, dirt etc.</p>
<p>The council will achieve a maximum density on any site (i.e. acceptable for that site) (min 70 hra, normal max. 100 hra family, 140 hra other) to increase the quality of dwellings and meet the needs of the population. Higher densities may be permitted in easily accessible areas located adjacent to public transport facilities where surrounding density is high. Densities are raised in the 1992 consultation document to 175 - 210 hra nearer public open spaces and affordable needs housing.</p>	<ul style="list-style-type: none"> <li>•</li> </ul>		<p>The LPA have managed to secure higher densities, especially on sites near transport nodes, and have also permitted car-free housing.</p>	<p>+ access to employment for more people</p>	<p>- smaller houses + access to housing + facilities, more people to support them + accessibility to facilities and services for more people - traffic impacts worse + effect on social cohesion in some areas - effect on social cohesion in some areas, especially lower density areas</p>	<p>- traffic increased - some loss of greenery + many CHP schemes implemented + built environment upgraded - effect on the built environment where it is seen to be over-developed - environmental wear and tear, litter, dirt, etc.</p>
<p>The council will seek residential floorspace in mixed-use schemes for redevelopment to help meet the housing needs of the population.</p>	<ul style="list-style-type: none"> <li>•</li> </ul>		<p>The LPA has not been successful in achieving residential uses in mixed-use schemes and has had to settle for accepting planning gain for housing elsewhere.</p>		<p>- access to housing in centres</p>	

<p>The council will encourage a change of use to residential uses in existing non-residential, under-used buildings, to help meet housing targets.</p>	<ul style="list-style-type: none"> <li>•</li> </ul>	<p>The LPA was successful in implementing this policy at the beginning of the period, but now developers are less keen, as high planning gain is required.</p>	<p>+ vitality and viability - loss of potential employment uses</p>	<p>+ facilities, more people to support them + access to housing</p>	<p>+ upgrading underused buildings</p>
<p>The council will ensure development which attracts a significant number of trips is located in areas of high public transport accessibility, and oppose developments and land use changes that disadvantage the provision of public transport, or lead to increases in private car use. This will ensure that conditions do not worsen for the transport disadvantaged, improve accessibility and ensure that energy-efficient modes of transport are desirable.</p>	<ul style="list-style-type: none"> <li>•</li> </ul>	<p>The LPA implemented this policy where it could. Accessibility has improved, but changes in travel behaviour have not been detected. LPA believes that results will be seen in the longer term.</p>	<p>+ vitality and viability - travel costs, as there is more congestion + travel costs for those closer to public transport nodes - higher maintenance costs + access to employment</p>	<p>+ accessibility to facilities and services - traffic impacts, as more traffic in centres + public transport access</p>	<p>- traffic volumes increased in centres + some modernisation, local environmental upgrading - environmental wear and tear</p>
<p>The council will permit extensions to shops within the designated centres to maintain their vitality and ensure residents have easy access to shopping centres and a choice of facilities.</p>	<ul style="list-style-type: none"> <li>•</li> </ul>	<p>This policy has been implemented and accessibility is good.</p>	<p>+ vitality and viability + access to retail employment</p>	<p>+ facilities + accessibility to facilities and services - some bad neighbour effects, especially food retail and take-aways</p>	<p>+ some modernisation, local environmental upgrading</p>

<p>The council will encourage employment uses to be directed to areas of high public transport provision to reduce the impact of traffic on the local population.</p>		•	<p>New employment uses have been largely directed to areas of high public transport accessibility. But the impact of traffic on residents is still severe.</p>	<p>+ vitality and viability  + access to employment  - travel costs because there is more congestion  + travel costs for those nearer public transport nodes  - increased maintenance costs</p>	<p>+ facilities for workers  + access to facilities  - more traffic impacts  + better public transport services  - public transport overstretched</p>	<p>- more traffic congestion in centres  - air quality worse in centres  + some upgrading of the built environment</p>
<p>The council will permit tourist related activity in three defined areas where public transport accessibility is good to improve the vitality of these areas and increase accessibility to tourists and locals.</p>		•	<p>New tourist related developments have mostly been located where public transport access is good. But in some places this has led to over-crowded and inefficient public transport.</p>	<p>+ vitality and viability  + access to tourist employment  - travel costs because there is more congestion  + travel costs for those nearer public transport nodes  - increased maintenance costs</p>	<p>+ facilities for tourists  + access to facilities  - more traffic impacts  + better public transport services  - public transport overstretched</p>	<p>- more traffic congestion in centres  - air quality worse in centres  + some upgrading of the built environment</p>

### 6.5.10 Evaluation of environmental policies in Camden



**Table 6.12 Evaluation of environmental policies in Camden**

objectives-achievements					assessment of impacts		
policy and objective	low	med.	high	comment	economic	quality of life	environment
The council will permit high density development close to public transport interchanges to reduce the need for travel by private motorised modes of transport.		•		The LPA has managed to permit increased density developments near public transport interchanges but consequent traffic reductions have not yet been noticed.	+ access to employment for more people	- smaller houses + access to housing facilities, more people to support them + accessibility to facilities and services for more people - traffic impacts worse + effect on social cohesion in some areas - negative effect on social cohesion in some areas, especially lower density areas	- traffic increased - some loss of greenery + many CHP schemes implemented + built environment upgraded - negative effect on the built environment where it is seen to be over-developed - environmental wear and tear, litter, dirt, etc.
The council will initiate and support schemes to use derelict or unused land to improve the quality of the environment and make the most of land as a resource.		•		Only 9.0 h. of land in Camden is now derelict.	+ vitality and viability + access to employment	- some bad neighbour effects	+ upgrading through the development of derelict land

<p>The council will promote an increase in energy-efficiency and the sustainable use of land and resources to ensure individual decisions are taken in an environmental framework which reflects environmental policies (including global warming). This includes considering the energy-efficiency potential of all developments in reducing traffic and encouraging the use of CHP.</p>	<ul style="list-style-type: none"> <li>•</li> </ul>		<p>The council has tried hard to promote sustainable development, and has made progress in some areas, e.g. CHP, protection of open land. However, its main problem - traffic and its impacts - is getting worse. A new sustainable transport scheme is being implemented later this year.</p>			<p>+ many CHP schemes implemented</p>
<p>The council will locate trip-generating developments in areas of high public transport accessibility, to help tackle the serious environmental problems facing the borough, e.g. air pollution and the negative effects of traffic congestion.</p>	<ul style="list-style-type: none"> <li>•</li> </ul>		<p>The LPA has had some success in locating trip-generating developments in areas with high public transport accessibility. But traffic problems are severe, and getting worse.</p>	<p>+ vitality and viability  + access to employment  - travel costs because there is more congestion  + travel costs for those nearer public transport nodes  - increased maintenance costs</p>	<p>+ facilities for workers  + access to facilities  - more traffic impacts  + better public transport services  - public transport overstretched</p>	<p>- more traffic congestion in centres  - air quality worse in centres  + some upgrading of the built environment</p>

### 6.5.11 Findings of the implementation study in Camden

Overall, Camden's two local development plans are both positive about the benefits of urban intensification, although they do contain policies to avoid over-development. The UDP (1992 and proposed amendments, 1996) includes comprehensive coverage of national and regional policies, even incorporating some of the least common policies, such as the use of higher densities to increase the use of CHP. The only major exception is the omission of national policy emphasis on increasing urban vitality and culture through intensification. However, Camden is probably one of the best served boroughs in the country for cultural facilities and therefore the LPA may not have felt these aims needed to be included.

Intensification policies in the UDP are mainly socially driven, with the need to solve the borough's housing problems providing a strong impetus to raise densities in new residential developments, and encourage housing in mixed-use schemes. However, environmental problems, especially those associated with traffic, are also high on the agenda, and the council is attempting to implement PPG13 (DoE and DoT, 1994) policies to help reduce the use of private motorised modes of transport within the borough. There were difficulties in keeping some of the policies in the UDP through the various stages of consultation. Policies on mixed-use, which the council hoped would be explicit, were watered down by the inspector. Planners now feel that they are harder to implement and less prescriptive; the inspector felt that the original policies were unduly rigid. The plan is based on a very careful analysis of policy at all levels, including European policy. Of all the plans in the case study boroughs Camden's is by far the most detailed and complex. This makes it difficult to draw out overall policy aims and some policies seem to be contradictory. The difficulties of legislating for protection against over-development and intensification simultaneously are evident in the UDP.

Most councillors interviewed thought that the UDP encouraged intensification and higher densities. Only one councillor thought that the plan was neutral. Most of the members related this position on intensification to sustainability, but they also talked about balance, pointing out that the UDP was strongly protective of open spaces, parks and private gardens. Councillors were also aware of intensification arguments used in committee. Half of those interviewed recalled officers using such arguments. The most common were those concerned with trip-reduction. But others said they had never heard such arguments and that opposing arguments were more common, i.e. that the LPA attempted to stop 'cramming' on inappropriate sites. Most councillors pointed out that the officers are keen to permit higher density housing, and mentioned that Camden is attempting to promote car-free housing. The majority of councillors (80%) also reported that they took intensification arguments into account when they made their decisions, citing issues such as reduction of trips, housing provisions, protection of the environment, energy-efficient technology and urban regeneration as important.

Overall, councillors were very positive about intensification, but all stressed the need for limits to development to ensure town cramming did not occur. One councillor also mentioned the



need to balance genuine housing needs with the aims of 'greedy developers' who attempt to use every bit of spare land to full capacity. Interestingly though, some councillors thought that these policies were more relevant to suburban boroughs, where densities were lower.

On the question of whether Camden's residents supported or opposed intensification, most councillors reported that they opposed it, but they qualified their answers by saying that most people did have some understanding of the trade-offs involved in meeting the borough's housing needs. Several councillors pointed out differences in attitudes between those living in residential and mixed-use locations, arguing that those in residential areas have a more NIMBY attitude because they fear possible social problems arising from high density development. One councillor called this protectionist stance from the well-housed a 'pseudo-environmental concern which seems blind to the desperate need for new houses for the homeless and overcrowded.'

The planners interviewed felt that to aid implementation of their policies better co-ordination was needed, not just within the borough, but at a London-wide level. They thought that the re-introduced Greater London Authority might take on this role, perhaps improving co-ordination, especially in transport policies. They also felt that they needed to co-ordinate policies with other boroughs to stop competitive advantage in planning gain, parking standards and so on.

Another main area which they believed could be improved was monitoring. In particular, the planners wanted more information on the cumulative impacts of their decisions, which they agreed are very difficult to monitor. They felt that they could use such monitoring information to 'direct development to the right areas' and to refuse applications on the grounds of cumulative effects. Currently they use only public transport capacity as a measure of development potential. They also found that sequential tests, as proposed in PPG6 (DoE, 1996b), were difficult to implement in a borough which is totally metropolitan in character. They felt they needed a test more appropriate to an inner London borough. However, they had adapted such tests and gave priority to issues of accessibility, but again the outcome was difficult to measure. Finally, the planners raised the topic of the Use Classes Order, arguing that it was too blunt an instrument to manage intensification successfully; for example the LPA would like more control over different types of retail development.

# Bromley

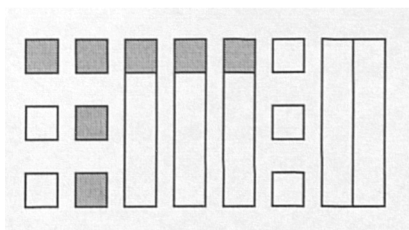
## 6.6 Bromley: Introduction

Bromley is an outer London borough with a population of 293,000. The population is expected to drop slightly over the next five years, by a total of 3,000. The number of separate households is expected to increase from 122,400 in 1991 to 124,700 in 2001. This figure includes an increase of 4,400 one-person households (London Borough of Bromley [LBB], 1994). The borough has a population density of 19.16 persons per hectare. It has an economically active population of 151,700 and low levels of unemployment. Its residents consist of a high proportion of skilled workers, many of whom work in central London. The borough has a mix of uses, with a strong office employment sector and a developing market for modern industrial and commercial premises. It is well connected to the M25 and the European Market, due to its proximity to the Channel Tunnel Rail links. It is known by locals as the 'clean and green' borough, and is bounded by green belt. The development plans covering the study period in Bromley are the *Bromley Local Plan* (LBB, 1985) and the *Bromley Unitary Development Plan* (LBB, 1994). Again, no special incentives or controls relating to urban intensification were identified.

### 6.6.1 Urban intensification policies and objectives in Bromley

The urban intensification policies and objectives contained in the *Bromley Local Plan* and *UDP* covering the study period are summarised in Tables E.7, E.8 and E.9 (Appendix E). These policies and objectives are summarised further below, and presented alongside data relating to development patterns and controls. The data on planning applications granted in Bromley come from LPAC's monitoring of applications of 10 units or more for housing and 1000 m.sq. for other uses (Table B.2). This is supplemented with ad hoc monitoring data produced by the local authority and other bodies, such as the London Research Centre (Appendix B and C). Information on applications smaller than those collected by LPAC is not available, so where it is lacking planners provide the main source of information from their local knowledge of development trends.

### 6.6.2 Development control decisions and the subsequent development patterns and trends relating to urban intensification policies with economic objectives in Bromley



- **Town centres will be the preferred location for major office developments. Limited provision will be permitted in district centres to make the most of existing office areas and prevent offices encroaching into residential areas. This policy will also improve employment choices and opportunities for Bromley residents.**

Applications for office development fluctuated over the period. The height was in 1989 when 55,853 m.sq. was granted (in applications over 1000 m.sq.) (Table B.2). Development rates then dropped to a low of 6,793 m.sq. in 1993. Applications granted have recently picked up again to 19,752 m.sq. in 1996. The distribution of these applications was mixed, but was mainly in existing centres. Over one third of all office development in the borough over the period was in Bromley town centre and most of the rest in district centres (LBB, 1994). There was some office development in the suburbs, but this was mainly in office parks. The office market in Bromley is fairly buoyant, with 16% vacancy rates (Table C.9). Maintaining the office sector has meant that employment opportunities in Bromley are good. The population is highly skilled and there is low unemployment (average 8.4% male and 5.7% female) (LBB, 1994). Therefore it appears that this policy has been quite successful. In the DETR survey (forthcoming) 11% of people surveyed said that job opportunities had improved due to urban intensification. Almost all other respondents thought that they had not been affected; only 2% thought that they had got worse.

- **Vacant industrial land will be re-used to make the most effective use of land in the borough**

Despite a decline in manufacturing in the borough over the study period, industry and warehousing remain important elements of the local economy, with a total of over 100 hectares of land in industrial or warehousing use (LBB, 1994). The areas which are under-used have not yet been redeveloped, but do have outline permissions, and a number of redevelopment proposals are being considered by the LPA. However, the borough now has no land which fits the DoE's definition of derelict land (Table C.32).

- **The council will only permit major new shopping developments in or adjacent to existing centres and will resist any proposals likely to prejudice the strategic shopping role of Bromley town centre. This will strengthen Bromley town centre and maintain vitality and viability of other existing centres**

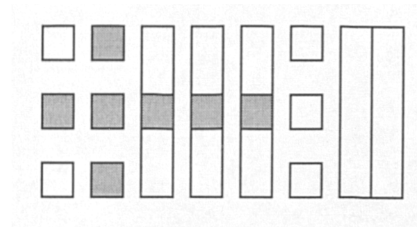
Permissions for large retail developments have fluctuated over the period. Four applications were granted (of over 1000 m.sq.) in 1989, and only one each in 1988, 1990, 1991, 1992 and 1994 (Table B.2). The number of smaller units approved has remained more constant, with a slight upturn in the last two years (planner interview). Bromley is well served for retail facilities, with a total of 803,800 m. sq. (LBB, 1994). The LPA has been successful in attracting new development to existing centres. In particular, the large development, 'The Glades', in Bromley town centre added an additional 201,500 m. sq. of retail space in the early 1990s and helped the centre increase 13 places in national rankings of numbers of multiple retailers in centres (from 37 in 1984 to 24 in 1995) (Hillier Parker, 1996). There have also been a number of out-of-town developments which have contributed to the 54,674 m.sq. of retail floorspace in the borough lying outside existing centres (Table C.7). These were seen at the

time of approval to offer benefits in terms of convenience and choice to Bromley residents, but now the LPA is resisting further such developments, mainly on grounds of their inaccessibility to those without access to a car (only 27% of Bromley's households).

- **Development in the green belt will be permitted only in very limited circumstances to assist urban regeneration**

Planners reported that developments in the green belt have been kept at very low levels for the study period. Protecting the green belt is one of the major concerns of local councillors and residents and therefore applications are very rarely approved. The issue of whether this has aided regeneration is difficult to assess. It certainly has not made the situation any worse for existing centres and the planners believe that this is a successful outcome.

### 6.6.3 Development control decisions and the subsequent development patterns and trends relating to urban intensification policies with quality of life objectives in Bromley



- **Housing developments will be permitted at densities of 40-60 hra for family housing and 55-70 hra for non-family. This will ensure that new development takes account of the need to provide good environmental conditions without being wasteful of housing land.**

The densities included in the *Bromley Local Plan* (LBB, 1985) and UDP (LBB, 1994) were usually adhered to but are, in any case, quite low. Planners recorded significant difficulties in raising residential densities, arguing that members usually apply the standards religiously and are more comfortable with applications at the lower end of the range. The planners reported that members were very suspicious of higher densities as they associated them with social problems. They also wanted to keep gardens large to help retain the 'clean and green', low density image of the borough.

This said, arguments surrounding densities are not likely to be particularly common over the next ten years in Bromley. This is because two large sites will account for 500 units of new housing, which means that only another 285 units per annum need to be provided until 2006 to meet housing targets. This figure is less than half the average rates of the 1980s, so very little large scale development is anticipated. It is interesting to note that during discussions on the development on the two sites (at Farnborough and Orpington Hospital) there was opposition to higher densities by local residents. They argued that higher densities meant that houses would

be smaller, and therefore cheaper, and thus a different type of people would live there and change the character of the area.

- **Conversions of houses into single dwellings will usually be permitted, to increase the supply of smaller units.**

Conversion activity has remained relatively constant throughout the period, with perhaps slightly higher rates in the late 1980s and a slowing in activity lately. The borough possesses neighbourhoods with very large houses, mostly Victorian villas, which are generally too large for single family occupation (DETR, forthcoming). In order to keep them in residential use, rather than change to office use, the LPA has allowed them to be converted into flats. They usually have ample parking and good access, and have contributed greatly to the supply of smaller units.

- **The council will retain housing in areas defined on the proposals map as housing areas, to retain the mix of housing types and help meet the need for smaller units.**

The LPA has managed to implement this policy, but mainly because very few applications for changes in the housing areas have been submitted. This is likely to be because the plan policies are very clear and because there is no market demand for other uses in these areas.

- **Within the Ravensbourne Road housing area the council will allow housing at higher densities than elsewhere, to meet the borough's housing requirements**

Only a small number of applications have been submitted in this area. Raising densities is easier here than in other places, because elected members see this as providing more housing of a similar type rather than changing the character of an area. In particular, higher density housing was seen by councillors to provide housing which 'matched the existing social profile.'

- **The council will permit extensions to houses to provide accommodation for family members.**

There is no data on housing extensions in Bromley. Indications are that there have been no problems in implementing this policy as long as garden sizes are not reduced to an unreasonable size by the extensions (planner interviews).

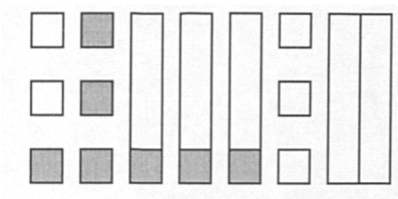
- **New shopping developments will be permitted in existing centres to increase accessibility to the maximum number of people**

As stated above (6.6.2), Bromley LPA has been relatively successful in locating retail development in existing centres. Several major out-of-town developments have also been

permitted during the study period (Table C.7). Bromley has 201,500 m.sq. of retail floorspace in town centres, compared with 54,674 in out-of-town locations. Shops facilities were seen, by Bromley residents, to have been more improved through intensification than any other aspect (DETR, forthcoming). 49% of people thought that facilities were more numerous and accessible.

Data on the modes of transport which people use for shopping trips sheds some light on issues of accessibility for those without access to cars, one of the main concerns of the LPA. There are approximately 190,000 shopping trips in the borough every day, 105,000 of these are made by car, compared with only 19,000 by bus, 1,000 by bicycle and 65,000 on foot (Table C.39). The relatively high walking total shows that, at least for these trips, distances are relatively short, and thus facilities accessible. The fact that almost twice as many trips are made by car as by the next most popular mode is less encouraging. The high car use is perhaps unsurprising, given the high parking provisions in most of the district centres, the number of out-of-town retail outlets and the high car accessibility rates (73% of households have access to a car in Bromley compared with a Greater London average of 62.6%, LBB, 1994).

#### 6.6.4 Development control decisions and the subsequent development patterns and trends relating to urban intensification policies with environmental objectives in Bromley



- **The council will only allow development in the green belt in very limited circumstances, to check unrestricted sprawl and protect the countryside**

The green belt covers 7,700 ha., which is more than half of Bromley's total area (Table C.28). As stated above, the LPA has been successful in protecting the green belt in Bromley. Pressure on the green belt is increasing now, especially as there are no major development sites remaining in the borough and connections to the M25 have recently been improved (LBB, 1994).

- **All development proposals will be assessed on their contribution to traffic generation and the potential availability of public transport (facilitated through improvements to public transport and greater policy integration between land use and transport planning)**

As explained above, traffic is a major issue in Bromley. Policies which attempt to regulate development on the grounds of traffic generation are always seen as competing with other

objectives in the plan, such as economic prosperity or housing provision. There is no proof that traffic problems have lessened over the study period. In fact on most routes traffic volumes have increased (LBB, 1997a) and the LPA has concentrated on trying to improve public transport rather than depend on restricting development. Nevertheless, large areas of the borough are still not accessible by public transport because the routes are seen as unprofitable by public transport providers (LBB, 1994).



## 6.6.5 Economic impacts of intensification in Bromley

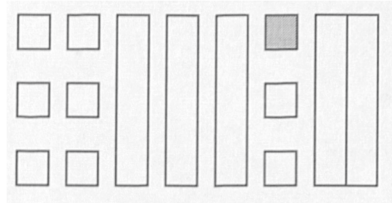


Table 6.13 Economic impacts of intensification in Bromley

Impact	Evidence of impact
improved vitality and viability of centres due to higher population densities which provide a critical mass to support businesses, and because planning policies are reducing competition from out-of-town developments	Existing centres in Bromley have benefited from new retail developments within them. Most centres are well used and retail vacancy rates are low (7% of stock) (Table C.9). Bromley Town Centre increased its ranking to 24th place in national tables, a rise of 13 places (Hillier Parker, 1996). However, out-of-town food stores have had a detrimental effect on some of the smaller local centres, but many of these have changed their retail profiles to compete.
benefits to the LPA in terms of cheaper infrastructure provision	No proof of this impact was found.
house prices may increase if the area is improved due to intensification	House prices were seen to have been negative affected in Bromley by intensification, especially in suburban areas. Councilors thought that even conversions in an area changed its character sufficiently to reduce the values of adjacent dwellings. Redevelopments in areas previously characterised by large villas were seen as especially detrimental.
reduced private travel costs to businesses and residents because trip lengths are reduced and traffic volumes reduced	Private and business costs are increasing as travel speeds in the borough have slowed over the study period. Very high car ownership and car commuting rates also exacerbate the problem (Table C.39; C.40; C.42).
higher housing costs because infill housing is more expensive to produce than greenfield housing	Overall, planners thought that costs were higher on infill sites.
higher maintenance costs, because infill increases wear and tear on the existing urban infrastructure	There may be a connection between maintenance costs and intensity of use, but comparing these costs with alternative development scenarios is not done by the LPA.
improved access to employment for urban residents because homes located near workplaces	There is some evidence to suggest that access to employment has improved due to policies of locating offices and retail uses in existing centres. 45% of Bromley's economically active population work within the borough (Table C.10). However, many people who live in the borough work in Central London or beyond. Lots of these people are highly skilled, and work in specialised jobs which are unlikely to be replicated at a local level. In the DETR survey (forthcoming) 11% of people thought that intensification had improved job opportunities and the majority of the remainder thought they had remained unaffected.
fewer opportunities to secure planning gain because infill developments are usually smaller than those on greenfield sites	For large retail and housing schemes, obtaining planning gain has been very successful. A few smaller schemes have also offered gains in terms of social housing.

## 6.6.6 Quality of life impacts of intensification in Bromley



Table 6.14 Quality of life impacts of intensification in Bromley

Impact	Evidence of impact
reduction in private space - smaller houses and smaller gardens, or no gardens	Average new house sizes in the borough have declined during the study period, as more non-family units and flats have been built (LBB, 1994). Also the high number of conversions and subdivisions has provided more small units, many without gardens. This trend is seen as meeting the needs of the changing population structure rather than a reduction in standards. The councillors stated that there are lots of working households who may not want, or be able to afford, a home with a garden.
better facilities because there are more people to support them	11% of Bromley's population thought that recreation facilities had improved due to intensification (DETR, forthcoming). Bromley is well served for leisure and cultural facilities; it has 2 golf courses, 4 theatres, 16 libraries, 8 sports centres and 6 swimming pools (Table C.24). The new 'Glades' shopping centre also incorporates new facilities such as a swimming pool. There have been no significant losses in facilities during the study period either. So, overall, facilities have increased, but there are concerns that they may be overstretched. For example, councillors argued that new housing developments on the Orpington Hospital site will tip the balance and overstretch facilities, especially schools. The LPA is happy that demographic changes mean that this will not happen.
safer centres due to increased numbers of people in the public realm - better natural surveillance during the day and night	The LPA was aware of arguments relating intensification to reductions in crime. However, it felt that the relationship was far more complex than a simple correlation between densities or increased numbers of people in the public realm and crime. It had been successful in taking security into consideration in new housing design and layouts (LBB, 1994).
improved accessibility because services and facilities are more localised and can be reached by a variety of modes of transport	As stated above (6.6.2) Bromley LPA has been relatively successful in locating retail development in existing centres (Table C.7). However, several major out-of-town developments have also been permitted during the study period. Bromley has 201,500 m.sq. of retail floorspace in town centres, compared with 54,674 in out-of-town locations. Shops were seen, by Bromley residents, to have been more improved through intensification than any other facility in the DETR study (forthcoming). 49% of people thought that shopping facilities were more numerous and accessible. Access to other facilities in the borough is good, with more than half the population (52.2%) living within 400m of a doctor's surgery, 22% within 400m of a bank or post office (Table C.19). Also 43.57% live within 800m of a major public transport interchange, of which there are three in Bromley (Table C.33).

<p>reduced traffic and, thus, traffic-related problems due to transfers to less environmentally damaging modes of transport, including public transport, walking and cycling</p>	<p>There is evidence that traffic conditions and problems are getting worse in Bromley. The DETR survey (forthcoming) found that 93% of Bromley residents thought traffic conditions had been harmed by intensification, 77% thought noise had increased, 77% that parking was more difficult, 76% that air quality was worse and 74% that road safety had deteriorated. These results are not surprising, considering the high car ownership rates and high numbers of through trips in the borough (Tables C.39; C.40). Planners agreed that traffic-related problems were the most immediate problems in the borough.</p>
<p>reduced access to open space due to open land being used for development</p>	<p>Access to open space in Bromley has not been adversely affected during the study period. In fact, public open space has increased by 22% since 1971 (Table C.31). Bromley has 7890 ha. of green belt of which 14% is accessible to the public, 683 ha. of MOL of which 63% is accessible (Table C.28) and 549 ha. of other protected open space (for which no accessibility figures are available) (Table C.27).</p>
<p>neighbourhoods are more socially integrated, show more social cohesion and better social conditions generally because of increased numbers of people</p>	<p>In some areas, especially mixed-use areas, the introduction of housing was seen as a positive contribution to social cohesion by the councillors. However, in other areas, intensification was seen to have a negative effect. There were reports from the councillors of negative effects on social cohesion due to residents' dislike of incomers in lower socio-economic groups. Also some existing residents thought that there were too many small households, seen to alter the balance of the borough i.e. there were less traditional family households (DETR, forthcoming). LPAC reported that overcrowding was not a serious problem in Bromley, with only 2.7% of the population living with &gt;1 person per room, and only 0.5% with &gt;1.5 persons per room (Table C.18). These levels are amongst the lowest in London.</p>
<p>potential bad neighbour effects of mixed-use developments</p>	<p>Bad neighbour effects were not too problematic in the borough, although the DETR survey recorded that 77% of people thought noise had got worse due to intensification. There were however, exceptionally high numbers of complaints about 'noise in the street', in fact one of the highest rates in London (Table C.17).</p>
<p>better public transport because of increased densities</p>	<p>27% of people in the DETR survey (forthcoming) thought that public transport had improved due to intensification. However, a similar number thought that the services were worsened due to traffic congestion, or buses and trains being crowded.</p>

## 6.6.7 Environmental impacts of intensification in Bromley

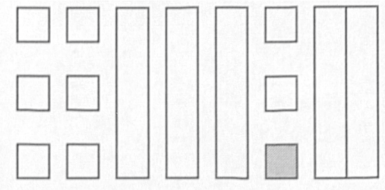
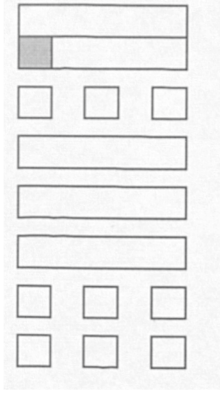


Table 6.15 Environmental impacts of intensification in Bromley

Impact	Evidence of impact
reduced number and length of trips by modes of transport which are harmful to the environment, primarily the private car, and increases in other modes - walking, cycling and public transport	There is very little proof of any reductions in modes of transport which are harmful to the environment. In fact, car use in the borough is increasing (LBB, 1994). As stated before, car ownership is very high in the borough. An analysis of shopping and journey-to-work trips shows that the car is by far the most common mode of transport (Tables C.39; C.40; C.42). There are 200,000 work trips in Bromley per day by car and only 50,000 on foot (Table C.40).
protection of the countryside and valuable rural land and green belt	Bromley's policies have been successful in protecting the countryside, with the exception of only a few small approved developments.
loss of greenery in towns, including trees, shrubs and greenery in private gardens	Intensification has led to some losses of greenery, especially on large sites. e.g. the hospital site which has recently been earmarked for a large housing development. Also some redevelopments in suburban areas and backland developments in gardens have led to losses of trees and foliage. But the borough is still seen as 'clean and green'. It has 360,349 trees at a density of 23.74 per hectare (Table C.34).
loss of ecologically important open space and habitats in towns, due to more intensive development	60.1% of the borough is protected open land, covering 9,122 ha. (Table C.27). There are also 8,000m of green chains (Table C.26). Some habitats may have been lost to development over the study period, but the scope for further losses is now very limited because almost all of the borough's major habitats are now officially protected.
improvements in air quality caused by trip reductions	The LAQN has reported incidents of carbon monoxide above standards suggested by the Expert Panel on Air Quality Standards in Bromley and adjacent boroughs, suggesting that heavily trafficked roads are causing air quality to be below accepted standards in London (LPAC, 1994).
more opportunities for CHP due to higher housing densities	The number of CHP schemes has increased in Bromley over the study period. The borough now has seven schemes serving 252 dwellings (Table C.36). The UDP is seeking to advance energy-saving design in new housing, and both major new housing schemes planned in the borough are incorporating elements of energy-saving technologies (LBB, 1994). Higher densities facilitate CHP, but it is not appropriate for all housing types. However, where CHP can be used in the borough, the council will do its best to implement it.

<p>positive effect of the local built and natural environment brought about by upgrading due to new buildings and high quality design</p>	<p>Intensification has improved the environmental character of some areas in the borough, especially Bromley town centre and also in some of the older industrial areas which have been modernised. However, the record in residential areas is more mixed. Some areas have been upgraded, but some are seen to have suffered due to losses of older, architecturally interesting, buildings and their replacement by poorly designed blocks of flats.</p>
<p>more environmental wear and tear due to increased numbers of people</p>	<p>It is very difficult to assess environmental wear and tear. The planners thought there was an obvious deterioration in infrastructure but, overall, they did not think this was an important issue in Bromley.</p>

### 6.6.8 Evaluation of economic policies in Bromley

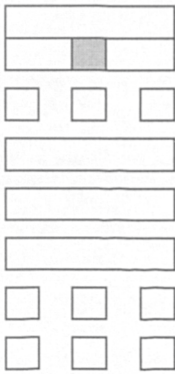


**Table 6.16 Evaluation of economic policies in Bromley**

objectives-achievements				assessment of impacts			
policy and objective	low	med.	high	comment	economic	quality of life	environment
Town centres will be the preferred location for major office developments. Limited provision will be permitted in district centres to make the most of existing office areas and prevent offices encroaching into residential areas. This policy will also improve employment choices and opportunities for Bromley residents.			•	Most new office development was located in existing centres, with over one third in Bromley town centre. Access to employment is good, unemployment rates are low.	+ vitality and viability + access to employment	+ access to facilities for workers - traffic impacts in centre	- traffic congestion + protection of the countryside - air quality + built environment, upgrading - built environment, larger buildings seen as out of scale
Vacant industrial land will be re-used to make the most effective use of land in the borough.			•	There is now only a very small amount of vacant land, and no derelict land in the borough.			+ use of vacant land

<p>The council will only permit major new shopping developments in or adjacent to existing centres and will resist any proposals likely to prejudice the strategic shopping role of Bromley Town Centre. This will strengthen Bromley Town Centre and maintain vitality and viability of other existing centres.</p>		•	<p>A major development was permitted in Bromley Town Centre which strengthened its position in national rankings of shopping centres. But several out-of-town developments were permitted early in the period.</p>	<p>+ vitality and viability  + access to retail employment  + planning gain to improve centres</p>	<p>+ facilities  + accessibility to facilities and services  - impacts of more traffic in centres, especially noise</p>	<p>- more car trips to centres and out of town  + protection of the countryside later in period  - loss of greenfield sites early in period  - loss of habitats  + upgrading of centres</p>
<p>Development in green belt will only be permitted in very limited circumstances to assist urban regeneration.</p>		•	<p>No major developments were permitted.</p>			<p>+ protection of green belt</p>

### 6.6.9 Evaluation of quality of life policies in Bromley



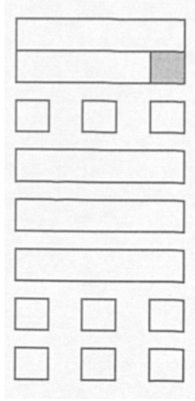
**Table 6.17 Evaluation of quality of life policies in Bromley**

objectives-achievements				assessment of impacts			
policy and objective	low	med.	high	comment	economic	quality of life	environment
Housing developments will be permitted at densities of 40-60 hra for family housing and 55-70 hra for non-family. This will ensure that new development takes account of the need to provide good environmental conditions without being wasteful of housing land.		•		Most developments permitted were within this density range, but the majority of successful applications were at the lower end of the range.		+ adequate private space + access to housing	
Conversions of houses into single dwellings will usually be permitted to increase the supply of smaller units.			•	High conversion rates continued throughout the period and helped meet the needs of smaller households.		+ access to housing - reduction in private space - traffic impacts, especially parking	+ no loss of habitats or open space



<p>The council will retain housing in areas defined on the proposals map as housing areas to retain the mix of housing types and help meet the need for smaller units.</p> <p>Within the Ravensbourne Road housing area the council will allow housing at higher densities than elsewhere to meet boroughs housing requirements.</p> <p>The council will permit extensions to houses to provide accommodation for family members.</p>		<ul style="list-style-type: none"> <li>•</li> </ul>	<p>The LPA implemented this policy successfully, but mainly because there were few applications for change of use or redevelopment in these areas.</p> <p>Higher densities were permitted in this area, because members saw it as providing more of the same type of housing and as meeting housing need.</p> <p>The LPA permitted most applications for extensions, with the exception of those which reduced gardens to an unacceptable size.</p> <p>Most new shopping developments were permitted in existing centres, but some out-of-ten were also permitted. However, accessibility is good.</p>	<p>+ maintain vitality and viability by maintaining population</p> <p>+ maintain vitality and viability by maintaining population</p> <p>+ increase value of house for owner</p> <p>+ vitality and viability</p> <p>+ access to retail employment</p> <p>+ planning gain</p> <p>- increased travel costs because more traffic at peak times</p> <p>+ cheaper travel costs for those who live nearer their work</p>	<p>- traffic impacts worse as car ownership rises</p> <p>+ access to housing</p> <p>- traffic impacts worse as car ownership rises</p> <p>+ access to housing</p> <p>+ increase private internal space</p> <p>+ facilities in centres</p> <p>+ access to shops</p> <p>- increased traffic congestion around centres</p> <p>+ more public transport services</p> <p>- public transport (buses) overcrowded and slow due to congestion.</p>	<p>- traffic</p> <p>+ protection of the countryside</p> <p>+ some CHP schemes implemented</p> <p>- traffic</p> <p>+ protection of the countryside</p> <p>- loss of garden space</p> <p>- increase in car use to centres and to out-of-town stores</p> <p>+ protection of greenfield land</p> <p>- air quality unacceptable due to traffic concentrations in centres at peak times</p> <p>+ centres upgraded by new developments (funded partially through planning gain)</p>
		<ul style="list-style-type: none"> <li>•</li> </ul>				
		<ul style="list-style-type: none"> <li>•</li> </ul>				
		<ul style="list-style-type: none"> <li>•</li> </ul>				

### 6.6.10 Evaluation of environmental policies in Bromley



**Table 6.18 Evaluation of environmental policies in Bromley**

policy and objective	objectives-achievements				comment	assessment of impacts		
	low	med.	high			economic	quality of life	environment
The council will only allow development in the green belt in very limited circumstances to check unrestricted sprawl and protect the countryside.			•		Very few developments were permitted in the green belt. Restricting development in the green belt is a priority in Bromley.	+ vitality and viability of centres + accessibility to employment for the majority of workers	+ access to facilities for all + public transport access	+ protection of the countryside - some loss of greenery and habitats in urban area + upgrading of centres
All development proposals will be assessed on their contribution to traffic-generation and the potential availability of public transport (facilitated through improvements to public transport and greater policy integration between land use and transport planning).	•				Locational policies have failed to improve the traffic conditions on Bromley's roads. The number of trips has increased over the period and traffic is cited as a major problem by residents.		- traffic impacts, parking and noise	- traffic - air quality

### 6.6.11 Findings of the implementation study in Bromley

By extracting intensification policies from the *Bromley Local Plan* (LBB, 1985) and UDP (LBB, 1994) it is clear that urban intensification is not a strong policy priority in Bromley. In particular, there are very few intensification policies with environmental objectives. The transport policies, even in the UDP, do not reflect current national or regional policy on issues of reducing transport through integrated transport and land use policies. Furthermore, housing policies show very little encouragement of higher densities or intensification. The overall tone of both plans is protective of the environment and the existing status quo. Any policies which might allude to intensification, such as the re-use of derelict land, are almost meaningless in a borough with so little of such land. Overall the main priorities of the plan are to retain the 'clean and green' image that the borough has cultivated in the past. Both the plans are very popular with local residents who also see conserving the borough's image as the most important aspect of planning. Councillors thought that the UDP was either neutral or discouraging in its policy stance on urban intensification. They definitely thought that it was designed to protect the leafy suburbs, MOL and green belt.

However, the planners believe that they have a duty to be more forward looking and incorporate some of the more radical sustainability policies into the next UDP review. They are aware that Bromley has not addressed transport issues in line with national policy and have produced UDP review discussion documents which cover all key issues in national sustainability policies. Their *Transport Review Paper 10* (LBB, 1997a) addresses in full issues raised in PPG13, and the *Housing Review Paper 9* (LBB, 1997b) proposes increasing densities, green building design, the promotion of mixed-uses and the possibility of relaxing conversion standards. As yet it is too early to say how these policies will be received, but planners feel they are very important issues that will have to be tackled at some point in the near future. They are hoping to incorporate changes in policy by linking the thinking behind them into principles already adopted in Bromley's statement on Agenda 21, *A Blueprint for a Better Bromley* (LBB, 1997c). In this way it is hoped that residents and councillors will make the link between local and strategic policy requirements.

Most of the councillors said that they were not very familiar with intensification arguments. One councillor explained this by saying that, because there is no capacity for intensification, it is not much of an issue in the borough. But most councillors saw intensification just relating to issues of residential densities and, as these are specified in the UDP, they did not think there was much scope for discretion. One councillor said that he was not bothered with intensification policies because he would rather stick to interpreting what is in the UDP or PPGs (even though PPGs are currently in favour of intensification). Conversely, another councillor believed that intensification was a very necessary part of planning and referred to the emerging discussion areas in the UDP revision documents as progressive.

Asked whether they used intensification policies when considering planning applications, most councillors said that they did, but that local issues were important too. For example, they argued that local residents did not want their neighbourhoods to be 'lowered' by social housing and smaller plot sizes and the councillors had to respect this. As one councillor said, 'As local councillors we need to represent the views of local residents who elect us, rather than the needs of the people who might move into the area if increased densities were allowed, or central government dogma.' Some agreed that intensification was the 'flip side' to rural protection, but others argued that it had a negative effect on urban greenery and led to overstretched facilities. Others did not consider such arguments because they were not in the UDP.

Planners felt that the planning committee had a good understanding of sustainability issues but that they applied them at a local level, which meant that planning was highly protectionist. However, the planners disagreed on the issue of councillors representing the people who live in the borough, arguing that the members should be aware of their 'quasi-judicial' role on the committee, which the chief planning officer had stressed to them in a booklet produced for all new members of the planning committee.

Planners agreed that implementing higher residential densities was almost impossible, because both existing residents and members oppose them on the grounds of overlooking, loss of amenity, noise, traffic and so on. One councillor believed that the desire to remain the 'clean and green' borough was so strong that people have little concern for other's housing problems. Because of this, densities were usually reduced from those in original applications. Residents associations usually rallied together to oppose any new high density proposals. However, the planners reported that, at appeals, density is taken alongside wider issues, and on several occasions higher densities have been permitted.

Turning to possible advances in the planning system which might be able to aid the implementation of intensification policies, the planners thought that a sustainability checking system, incorporated with monitoring, may be a good way forward. They thought that internal working arrangements within the LA worked well, especially as stronger links had recently been made with the transport section. The planners also thought that LA21 may be way of moving environmental policies in general forwards. Their *Blueprint for a Better Bromley* (LBB, 1997c) is increasingly being used as an environmental policy. They believed that sustainable development is embedded in words in the borough but now needs to be translated into action as well. In fact, they reported that negotiations between the LPA and prospective developers are very important at the application stage, as this is often where sustainability issues can be discussed and compromises reached. However, they admit that it will be interesting to see how the ideas in the UDP review papers are received and whether they are incorporated into the UDP revisions. If they are, the planners believe they will still be hard to implement because planning has been seen as a reactive - not active - activity for so long. This may have to change if sustainability policies are to be implemented successfully.

# Part Three

# **Chapter Seven: Evaluation of intensification policies**

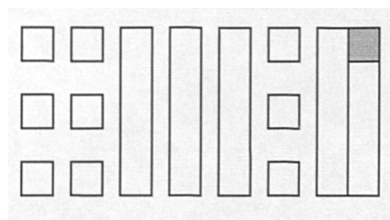
# Chapter Seven: Evaluation of intensification policies

## 7.1 Introduction

This Chapter presents an evaluation of the findings of the case studies. It attempts to answer the first research question, posed in Chapter One: will the urban intensification policies that are in place in the UK lead to a sustainable urban form if implemented? In order to do this, the chapter first determines the extent to which national policies were included at the regional and local level in each case study. Then it assesses how successful each borough was at locating development in accordance with its policies. For each interest category - economic, quality of life and environment - the findings of the case studies are then compared with the objectives identified in national, regional and local policies. The same questions that were posed in Chapter Four concerning the claims of intensification policies are posed again in this chapter, but are answered from the results of the case studies, and informed by the debate presented in Chapter Four.

The analysis of the case study findings then turns to the impacts of policies, and again draws out trends from the findings across all three interest categories. The evaluation considers how these impacts affect the overall evaluations of policy performance. Throughout the research it has been important not to allow the categorisation of the three interests to preclude a discussion of how they interact with each other. So the final stage in the evaluation is an analysis of how each interest category's achievements interrelate with the other categories. This allows an analysis of the findings presented in the evaluation tables (in Chapter Six) across the three case studies.

## 7.2 Evaluation of intensification policies with economic objectives across the case studies



Chapter Four summarised central government's economic policies which promoted urban intensification in the UK as an attempt to improve urban areas to attract businesses and new residents, to contribute to vitality and viability and halt urban decline. These policies concentrated on providing land for economic uses in urban centres and restricting economic development in other locations. In particular, they stressed the benefits of using derelict and underused land for economic purposes and promoting mixed-use. However, economic aims in

policies were always coupled with warnings of over development, and policies stressed the need to balance economic demands with the broader aims of sustainable development.

### **7.2.1 Inclusion of national economic policies and objectives at the regional and local level**

In all three case study boroughs there was a relatively good inclusion of central economically-driven intensification policies into local plans. Central policies had been incorporated into regional guidance, and this was referred to during local plan preparation. All three boroughs had policies to locate new retail developments in existing centres. Harrow and Bromley also had policies to locate new offices and other employment uses in existing centres. Harrow and Camden had policies to protect shopping uses in existing centres, and all had policies to use vacant and underused land for employment-generating development. Camden also had a broader policy of consolidating the existing hierarchy of centres.

This said, there was one major omission from local policies. Mixed-use was included in regional policy, but it was not stressed as strongly as in central policy guidance. In local plans, mixed-use policies were included in varying degrees. In Harrow, policies to encourage a mix of uses were included, but only to existing centres; residential areas were to be protected from other uses. In Camden, the UDP originally contained a policy to ensure a residential component in any large commercial or retail development. However, the policy was altered by the inspector during the inquiry stage preceding adoption of the plan and is now less prescriptive. In Bromley a policy of functional zoning was in place, with the distinct aim of keeping employment and residential uses separate.

### **7.2.2 LPAs' success in locating development in accordance with their economic objectives and policies**

First, on managing to guide new development to more centralised locations and use vacant land, the boroughs became progressively more successful throughout the study period. In terms of office development, all three boroughs permitted the majority of new office buildings in centres. Bromley was particularly successful, with over a third of new office buildings being in Bromley town centre itself. Similar findings apply to the location of new retail developments. Although Harrow and Bromley approved out-of-town retail developments early in the study period, later they both permitted major new developments in their town centres. All three LPAs were also successful in locating economically beneficial developments on derelict and underused land. By the end of the study period, all three boroughs had very low levels of land classified as derelict (Harrow had 0.1 ha., Camden had 9 ha. and Bromley had no such land).

Unsurprisingly, in the absence of policies to achieve mixed-use in Harrow and Bromley, it appears that the spatial arrangement of uses in these boroughs has remained largely as it was at the beginning of the study period<sup>1</sup>. Camden, however, aimed to develop more mixed-use areas,

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<sup>1</sup>Exceptions are several light industrial developments in residential areas, and the re-introduction of housing into some of the centres.



even though its official policy was weak. Planners had some successes, especially in converting offices into residential uses in predominately commercial districts. However, they had little success in achieving any residential development in new commercial schemes.

### **7.2.3 Economic policies' success in meeting their aims**

**7.2.3.1 Does urban intensification contribute to vital and viable local economies?** - In Chapter Four, the objective of using urban intensification policies to promote more viable and vital local economies was identified as present in central policy; viable local economies are seen to be an element of sustainable urban development (HM Govt, 1994). National policies were then questioned in the light of criticisms that local economic policies might not be strong enough to counter stronger national or global economic pressures (HM Govt, 1994; DoE, 1996a), and that other economic side-effects might outweigh economic benefits. However, some evidence from areas in the UK that had been intensified was also presented; it showed indications of a positive relationship between intensive, concentrated development and local economic performance (Gossop, 1991).

In reviewing the evidence from the case studies, it appears that intensification can bring about some economic benefits to urban centres. Since local policies in the case study areas advocated development in existing centres, and restricted development elsewhere, most centres' economic performances have improved. Those that have not were often judged by planners and councillors to have been irreparably harmed by out-of-town retail developments or food superstores in nearby centres. Planners thought that the success of local policies was obviously aided by national economic trends, but that consolidation policies were important in their own right because they gave developers some certainty in knowing where applications would be approved. This enabled developers to concentrate on town centre developments in the knowledge that their investment would not be in competition with out-of-town developments in the future. This, the planners and councillors agreed, gave confidence in existing centres and encouraged inward investment. Both Harrow and Bromley town centres had major new shopping centre developments in the study period; these attracted a number of multiple retailers and thus increased the centres' national ratings<sup>2</sup>. Furthermore, these developments facilitated improvements through planning gain and had a knock-on effect of upgrading and attracting further investment.

Some answers to the question of whether local economic strategies can play a part in reviving localities in the face of global and national economic trends can be given in the light of these case study findings. The research showed, and central policies imply, that intensification has the greatest effect on the service sector, which is the largest economic sector in London. Service sector economies in any given space are often described as divided into 'producer services', which are provided on a national or international scale and are relatively free to locate anywhere, and consumer services which are generated by the people and firms in a given place

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<sup>2</sup>There are a number of ways of rating urban areas, see for example, Reynolds and Schillier (1992).

(Healey, 1997; Moulaert and Todtling, 1995). The locational choices of producer services are largely dependent on the assets of any given locality (Blakely, 1989; Piore and Sable, 1984). These could be environmental assets, labour resources, transportation links and so on (Healey, 1987). Thus, if intensification improves an area's assets, then it can play a part in attracting new investment. This has certainly been the case in the town centres in Bromley and Harrow, which have been upgraded by intensification and have attracted multinational and national retail and office investment. Thus, because LPAs cannot rely on national macroeconomic policy to generate local jobs, they are turning to localised solutions to improve their borough's 'marketability' (Harvey, 1985; Bacaria, 1994; Ashworth and Voogd, 1990).

In the case of consumer services, central policy states that maintaining population densities in an area generates new service suppliers and maintains existing ones. Planners and councillors in the case studies felt that accommodating rising household numbers had meant that consumer services had been supported and were, therefore, viable. Rising business registration rates, employment levels and commercial occupancy rates can also be seen as an indication of this trend. There are a host of intervening variables besides urban intensification which relate to an area's economic viability. It does appear nonetheless, that maintaining or increasing densities and encouraging residential uses in mixed-use areas does play a part in supporting and generating consumer services.

### 7.2.4 The wider economic impacts

Chapter Four identified a number of wider economic impacts from literature which are not contained in central policy aims. Unsurprisingly, none of these impacts were identified in regional or local policies either. However, they were included in the case study research, in order to see if there was any evidence of them in the three London boroughs and to see if they 'outweighed' the benefits claimed in policy.

The first impact to be identified was the **potential benefit to LPAs in terms of cheaper infrastructure provision**. In literature and policies in other parts of the world, strong arguments about savings in public spending were made (Dunstone and Smith, 1994). However, research in the UK concluded that LPAs were not concerned with variations in infrastructure costs between different development locations and forms (DoE, 1993b). In reviewing the case study findings, it appears that the assertions made in previous research in the UK are correct (*op cit.*) and that the relative costs of infrastructure provision for different locational options was not considered by the LPAs in the case studies, mainly because they thought that other issues were more important in determining a decision on any particular development. Planners also thought that the trade-offs in infrastructure provision were too complex to generalise about because some infill developments could use existing infrastructure, whilst on other sites expensive new systems would be required. Similarly, on smaller infill developments existing roads and street lighting could be used, whereas on new sites this might have to be provided.

Furthermore planners argued that there were no statutory requirements for them to relate infrastructure costs to development proposals, and therefore they had little incentive to make such complex calculations. Planners also stated that, because they expected developers to pay for the majority of infrastructure in major new developments through planning gain, cost was not a major deciding factor for the LPA.

The **ability of urban intensification to affect house prices** was also identified from the literature as a possible economic consequence of intensification. The contention was that house prices might rise if intensification upgrades an area, or that they might be reduced if an area is perceived to be over-developed (Babbage 1993; Dunstone and Smith 1994). This could affect sustainability by making certain areas unaffordable, or others overdeveloped 'ghettos'.

Evidence of increases and reductions in prices were identified by planners and councillors in the case studies. The positive effects of some intensification schemes in Harrow and Camden were responsible for changing the image of formerly run-down parts of the boroughs, especially areas which had been used for industrial purposes. In these areas, new flats and town houses had led to gentrification and house prices in the vicinity had risen accordingly. However, in Harrow and Bromley in low density suburbs, house prices had been affected negatively by infilling and redevelopments which had changed the character of the areas. Some councillors thought that reports of such devaluing were exaggerated by residents, and that even if there were short term changes, over time prices usually stabilised.

Another suggested economic impact related to **private travel costs to businesses and residents**. Opinions in previous research were mixed about whether travel costs, in terms of time and fuel, would increase or decrease in intensified areas. Writers such as McLaren (1992) and Hillman (1996) believed that private travel costs would decrease because trips would be shorter and quicker and involve less car use. Conversely, other writers believed that intensification leads to concentrations of traffic in certain areas, thus increasing traffic congestion and increasing private travel costs (Dunstone and Smith, 1994).

The data from the case studies cannot show conclusively the relationship between density and travel patterns, as it does not account for intervening variables. However, it does show trends in travel frequencies and modes, and none of these indicate that traffic is reducing, or that people are using more emissions-efficient modes. In all three case study areas, average traffic speeds have slowed over the study period and the numbers of cars on the roads have increased. This is likely to imply that private travel costs for businesses and individuals have also increased. In fact, in Harrow, businesses responding to a survey cited travel costs as a major expense, especially to small firms (LBH, 1991a). It is difficult to say how much of the increase in traffic is a direct consequence of built form intensification, and how much is related simply to higher car ownership and usage. What is clear is that changes in urban form are not significant enough to counter prevailing trends for increased use and ownership of cars. Whilst this remains the

case, private travel costs will continue to mount for individuals and businesses using road transport.

The DoE's work on alternative development patterns, reviewed in Chapter Four, suggested several other economic impacts of urban infill which were investigated in the case study boroughs (DoE, 1993b). The first was **the cost of infill housing**. The suggestion was that costs are cheaper, on the whole, on greenfield sites because there are no land reclamation and preparation costs. Also, greenfield sites are more attractive because developers can capitalise on economies of scale. The effect of this impact on sustainability is important, as higher costs of infill development may outweigh benefits in terms of vitality and viability of more centralised development.

Drawing conclusions from the case studies about this issue was difficult. Most of the planners thought that costs were higher on infill sites, but suggested that because planning policies permitted higher densities on inner urban sites, they might nevertheless be more profitable, or at least not less profitable. This is especially true of sites close to transport nodes, as proximity to public transport was an asset that many commuters were willing to pay for. They also agreed that there were higher on-site costs for urban infill. Planners also thought that the dual effects of financial aid to prepare contaminated land for development and the imposition of planning gain on out-of-town sites may be evening-out development costs, although they accepted that there are still likely to be economies of scale for larger greenfield developments.

The DoE research also suggested that **urban infill would have higher maintenance costs**, because infill increases wear and tear on the existing urban infrastructure. This relationship was identified by all the LPAs. However, the planners felt that good management and monitoring of infrastructure was the key to dealing with increased usage. They also pointed out that increasing the number of households in the borough increased opportunities for raising local revenue to pay for marginal costs of maintenance.

Another contention was that urban infill offered **improved access to employment for urban residents** because in urban areas homes could be located nearer to workplaces than if continued dispersal occurred. However, the research noted that this benefit may be more obvious to those looking for employment in service sectors, as these are usually more centrally located than expanding industries, which favoured peripheral locations (*op cit.*). The case studies provided complex data on this relationship, which needs to be carefully interpreted in order to draw out evidence of this relationship and make some conclusions.

In Harrow, more economically active residents now work in the borough than at the beginning of the study period. The UDP states that this is proof that accessibility to jobs has increased, and that consolidation policies are working. However, more people also travel into the borough to work, so more jobs have also been provided for those living farther away. Furthermore, a

high proportion of Harrow's residents still work outside the borough. Many of these are skilled workers with specialised jobs in central London. Similarly, in Camden, more jobs are available in the borough now than at the start of the study period, but many of the jobs created over the period were in specialised fields such as medicine, media and marketing, whereas the unemployed in Camden are mainly looking for unskilled or semi-skilled work. This said, there have been increases in the numbers of jobs in the retail and hotel and catering sectors which have provided jobs for local people. In Bromley too, access to retail and office employment in existing centres has improved, but more than half of the borough's economically active residents still work outside the borough. Planners report that the borough is home to many high-earning professionals who enjoy the suburban quality of life in the borough's lower density neighbourhoods, but commute into central London to work.

Overall, there appears to be some evidence that access to certain types of employment is improved by intensification. Employment opportunities are obviously related to economic performance, so the conclusions from this data are similar to those on the relationship between intensification and economic vitality and viability. Accessibility to employment is most improved in the consumer service sectors, which benefit directly from intensification, but producer services which have been attracted to the town centres also benefit. Thus, the results show that access to office and retail employment improved first, because there are more jobs in these sectors and second, because physical accessibility was improved due to the availability of public transport services. For other types of employment, especially more specialised occupations, urban intensification does not appear to have a significant effect. People still commute long distances to enjoy the combination of home and work environment which they choose.

The final contention proposed in the DoE research is that there are **fewer opportunities to secure planning gain on infill development** because they are usually smaller than those on greenfield sites, and research showed that large free-standing developments are likely to facilitate the largest gains (1993b). The findings from the case studies on this issue challenge this finding. All three boroughs were in a strong position to negotiate for planning gain, as they have strong land markets due to their proximity to central London. Thus the boroughs are desirable locations for a number of uses and land prices are high. All three UDPs contained policies clarifying types of development which would be subject to planning gain, and the types of that gain would be appropriate. Harrow and Bromley concentrated on issues of environmental improvements, and Camden emphasised environmental benefits combined with social facilities, including a strong element of social housing.

All three boroughs had been successful in achieving planning gain over the period, and all noted some success on smaller infill sites as well as on larger sites. Camden had achieved planning gain on many commercial developments on infill sites, due to the high profit margins expected by developers to be secured by favourable locations in the centre of London. Bromley

and Harrow had both achieved planning gain for centrally located developments, and had secured environmental and urban design improvements. They had also achieved social housing gains over the period. Overall, the planners felt that the argument that planning gain is less feasible in infill development is probably true in absolute terms, but depends on the value of the scheme rather than on size and location alone.

### **7.2.5 Quality of life impacts of economic policies**

As stated above, it is important to identify how the objectives and policies of one interest category affect the others: in this case how the outcomes of economic policies affect quality of life. The exact effects are identified in Tables 6.4, 6.10 and 6.16, but this section draws out some trends. First, it must be said that making generalisations on the cross-over of impacts is extremely difficult, especially as the findings concerning economic policies themselves are complex, and appear to be dependent on a host of conditions and variables. However, some links can be made.

It seems that concentrating employment-generating development and retail uses in existing centres has had a positive effect on the services and facilities in these centres and has improved access to them, especially for people working in centres and the transport disadvantaged. A more direct impact in Bromley was that new facilities were provided in the centre through planning gain.

However, alongside the benefits there are also costs. Increases in traffic to the centres at peak times were identified and public transport was often overcrowded, and where new employment-generating developments had been located near existing residential areas, some bad neighbour effects were identified. There were also some bad neighbour effects associated with new non-residential uses. In Camden, in mixed-use areas, there were complaints about new restaurants and clubs. In Bromley and Harrow increased noise on the streets was a problem. Assessing the proportion of these bad neighbour effects that are related directly to intensification is almost impossible, but it is likely that it is a component of the problem.

### **7.2.6 Environmental impacts of economic policies**

In national intensification policies, the trade-off between economic development and the environment is frequently stated as something which needs to be given considerable attention if planners are to achieve sustainable development patterns. Central and regional policies stress that economic growth and sustainable development can be achieved simultaneously, but only if they are carefully managed. In the case studies, some environmental improvements were identified as the result of economic policies. Increased economic activity facilitated upgrading of the local built environment in existing centres in Harrow and Bromley.

However, the downside of consolidation was that it had led to increased environmental wear and tear in centres. Many of the planners and councillors also thought that increased

centralisation of economic activities had worsened traffic problems, and made the environment worse for pedestrians and cyclists. As stated above, although there is no data to relate intensification to traffic increases specifically, most planners made the link. Bromley town centre was perhaps the worst effected, but this was due partly to the fact that the new shopping development was accompanied by a large multi-storey car park.

On the question of whether the locational policies followed by the LPAs for economic reasons represent a sustainable use of land, conclusions are varied. Certainly where vacant and underused land was used, this is seen as beneficial. Nevertheless, it is impossible to say whether employment-generating developments which were located in centres over the period would have located on out-of-town sites if policies had been different. However, planners believe that, as the trend was previously for out-of-town sites, then the policy change had significant effects.

### **7.2.7 Conclusions on economic policies**

The main economic justification for intensification policies is that by promoting intensification in its various forms, urban economies will be more vital and viable. Policies focus primarily on urban cores and hinge on the assertions that higher population densities support local service suppliers, and concentrations of business activity bring about their own agglomeration economies (see Pertrakos, 1992). This research looked for evidence of this trend, but also sought to explore some of the many conflicting economic impacts of intensification, which may counter the predicted positive effects.

Overall, the main aim of improving economic viability and vitality in centres appears to have had some success, and generally the policies and their effects are seen as positive by local populations and businesses. Making the most of existing central areas by restricting development elsewhere has led to significant upgrading and new facilities. Strong local policies to restrict peripheral development, combined with sequential testing in all the case study areas, gave developers a clear indication that making central sites economically sustainable is one of the LPA's priorities.

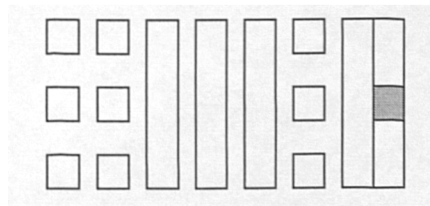
Since major investments were made in these central areas the potential to increase jobs by attracting producer services and supporting consumer services has also been realised. What is more, these benefits have been achieved largely simultaneously with benefits to quality of life and to the environment (with the notable exception of increased traffic nuisance). This said, determining the extent to which these benefits are a direct result of urban intensification, and how much they are the result of broader economic trends, is almost impossible. Nevertheless, the conclusion shared by planners and most of the councillors is that by providing a positive framework for investment in urban centres, and restricting competition from out-of-town locations, planning polices at least are making the opportunity for economic trends to

contribute to urban areas as a whole, rather than just dispersing it to peripheral sites which might cause adverse reactions in the urban centres.

This said, the fact that any broader economic consequences of intensification are not considered in policy is a major drawback to achieving sustainability, as economic consequences affect the feasibility of intensification. This is an example of how policy content (or lack of it) affects policy processes (a point which will be reviewed in Chapter Nine). For example, if policies do not consider the differential costs of different types of development, maintenance, or infrastructure provision, then they are in danger of overestimating the economic benefits of intensification. Whilst intensification may be beneficial for the private sector, in that agglomeration economies can be achieved, if the costs are also higher because of higher land preparation costs or infrastructure provision then policies are only accounting for part of the consequences. Similarly if policies do not address the costs to the public sector, then the economic implications could be unsustainable.

In some respects, LPAs are already beginning to address this issue by using planning gain to pay for environmental improvements, landscaping, public transport and so on. But unless the full range of private and public economic costs and benefits of different development scenarios are explored, then the external costs of intensification may be under-, or over-estimated. Currently, planners have very little information on the economic consequences of different forms of development. Yet, in other countries cost-benefit calculations are at the forefront of planning decisions (Dunstone and Smith, 1994). Perhaps if central policies addressed economic issues more openly and clearly in the UK, then the costs and benefits of intensification could be managed to ensure that the process truly delivers economic advantages.

### 7.3 Evaluation of intensification policies with quality of life objectives across the case studies



Chapter Four presented three related national policy objectives which related intensification to improving the quality of life. The first was to provide sufficient land for housing in the most sustainable way, the second was to foster community spirit, promote cultural activities and build communities, the third was to improve accessibility by retaining high population densities so that services and facilities could be provided locally. Policies to achieve these aims focused on concentrating housing in urban areas, especially on infill sites and vacant and derelict land, increasing densities and making more intensive use of existing stock. They also advocated



mixed-use, maintaining residential uses and locating housing near employment opportunities and retail facilities.

### **7.3.1 Inclusion of national quality of life policies and objectives at the regional and local level**

The different components of national intensification policy aimed at improving quality of life were included in regional guidance and local plans to varying degrees. The first aim, to provide land for housing in the most sustainable way, was interpreted at the regional level as meaning development in existing urban areas, especially older urban areas, to aid regeneration and restrict urban sprawl. In local plans these aims were largely mirrored. In Harrow and Bromley the aim of resisting development in the green belt was stated. Policies to concentrate housing on vacant and derelict land, and make more intensive use of existing stock, were also contained in plans in all three areas. In Bromley and Harrow these policies were very carefully worded, and were stated in the context of plans which were predominately anti-intensification in nature. So, although policies advocated locating housing on vacant sites, they did not promote development on infill sites in general, or advocate higher densities. In fact, as shown above, policies to increase densities were included only in Camden's UDP. In Harrow and Bromley, densities were reduced, and unaltered respectively.

The second aim, to upgrade urban areas, foster civic pride, promote cultural activities and build communities, was noticeably lacking in both regional policy and local plans. All three boroughs contained comments favourable to these aims in the text accompanying policies in their plans, but these were not translated into policies. The reason for this policy omission is not clear, but it could be because promoting urban culture is a relatively new central policy aim, or because LPAs do not make the link between intensification and the cultural and social benefits suggested in national policy.

The final objective, to improve accessibility to facilities and services, was included in local plans by all three boroughs. However, they did not make the link contained in central policy between high population densities and increased accessibility. Instead, they concentrated on issues of centralisation of services, and accessibility by a variety of modes of transport. Bromley used reduced accessibility as a reason to limit further out-of-town retail development, and Camden and Harrow used it as justification for concentrating employment, retail and leisure facilities in centres. The national objective of encouraging mixed-use to improve accessibility, by focusing housing near employment opportunities and retail facilities, was contained only in Camden's UDP. Here, improving accessibility for the borough's non-car-owners (over 50% of households) was an important objective.

### 7.3.2 LPAs' success in locating development in accordance with their quality of life objectives and policies

All three LPAs managed relatively successfully to concentrate new housing within urban areas, especially on infill sites, vacant and derelict land. At the beginning of the study period, Harrow and Bromley were less successful and permitted some developments in the green belt and on peripheral sites<sup>3</sup>. Harrow also permitted large numbers of homes in the suburbs which, although in compliance with local policies, were very unpopular with existing residents. As the period progressed, the LPAs in all three boroughs managed to concentrate development on redevelopment sites within urban areas. In Bromley, the release of two large sites accounted for almost all the required number of housing units. In Camden, developments have been located mostly on underused sites and redevelopment sites. All three boroughs managed to make good use of vacant land for housing. This is mainly due to the high market value of land in London, and the fact that development land is scarce in all three cases. Currently, all three boroughs are meeting their housing targets. However, planners in Harrow and Camden foresee problems if policies are not relaxed to allow further development in lower density areas.

As seen above, LPAs had varying policy approaches to increasing densities. Harrow and Bromley have not attempted to raise densities on quality of life grounds. Camden, however, has attempted to raise densities in central locations and on sites that are well-served by public transport. The LPA's reason for this is mainly to offer access to affordable housing and, because councillors are also acutely aware of housing shortages in the borough, higher densities have been permitted. In fact, recently, several high density car-free housing schemes have been approved.

All three boroughs managed to make more intensive use of the existing building stock, with residential conversion, extension and subdivision activity remaining high throughout the period. In Bromley, making more intensive use of existing stock was seen as a less controversial way of accommodating the rise in household numbers than new build, and was also seen as a good use of larger buildings no longer in demand for single family housing. In Harrow too, subdivisions and conversions were seen as a sustainable and effective use of investments that had already been made in the built environment, and as a way to meet the needs of smaller households. In Camden, the LPA were successful in implementing policies such as converting underused offices into housing, and had permitted large numbers of conversions into bedsits, shared houses and flats. This was seen as a sustainable use of a robust building stock. The LPAs were also successful in retaining residential uses by resisting changes of use and redevelopment.

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<sup>3</sup>As stated in Chapter Six, some applications were permitted on appeal.

### 7.3.3 Quality of life policies' success in meeting their aims

**7.3.3.1 Does providing more homes in urban areas lead to a better quality of life?** - In Chapter Four, research findings which concluded that the effect of intensification on quality of life depended on the type of intensification, the socio-economic characteristics of the area in which it was taking place and how its impacts were managed were presented (DETR, forthcoming). The literature review also suggested that improving urban quality of life was a key tenet of urban sustainability, because if people do not enjoy urban living then those who can leave will, and this would clearly be unsustainable (Smyth, 1996). This research found a number of varying perceptions of how intensification affected people's quality of life. As in the DETR research opinions seemed to depend on the specific type and amount of intensification and where it had occurred.

Most councillors and planners believe that intensification in existing centres has a positive effect on quality of life<sup>4</sup>. People who live in the suburbs enjoy the accessibility of a variety of new facilities and the benefits of clustering trip-ends, but do not suffer any bad neighbour effects. Those who live in the centres seem to appreciate increases in facilities and shops and environmental upgrading. Nevertheless there are exceptions to this general finding. For example, when development in centres was judged to be unattractive, or there were problems of environmental wear and tear and disturbance from noise and traffic, then intensification was seen to have had a negative effect on quality of life<sup>5</sup>.

Conversely, intensification in suburban areas was consistently associated with a reduction in quality of life, whether due to perceptions of 'town cramming', a dislike of new people in the area, loss of character or more traffic. In Harrow, the effect of suburban intensification on quality of life was an important local political issue in the late 1980s and, in Bromley too, almost any new development in the suburbs was defended by well-organised networks of residents groups complaining of loss of amenity, overlooking, loss of light and so on. But again, there were exceptions. When a disused industrial site in suburban Bromley was developed for housing, this was seen to improve the quality of life, by eradicating a local eyesore.

The conclusion from this is that opinions on intensification and quality of life are a reflection of how intensification changes the assets which people value in their neighbourhood. If they value vibrancy and liveliness, and intensification appears to add to them, then they will obviously see it as positive. Conversely, if people value the quiet character of residential neighbourhoods, and intensification changes it, then residents will not be in favour of it. This finding sounds simple enough, but the difficulty of characterising public opinion in any given place is complicated by the diversity of perceptions of it (Evans, 1994; Healey, 1997). Not all people in a given space have the same values, and even identifying whose opinions are important is complex - is it the

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<sup>4</sup>This is reflected in residents surveys, LBC (1994), LBH (1991b).

<sup>5</sup>See also DETR (forthcoming).

opinions of existing residents that matters? or of potential new residents? or of people who work in a place or visit it for leisure? To answer these questions, political decisions have to be made about how to weight attitudes (see Chapter Nine).

**7.3.3.2 Does urban intensification improve a city's vibrancy and culture, and lead to a sense of community and local identity?** - The arguments in central policy that urban intensification can improve a city's vibrancy and lead to the production and consumption of culture and also improve feelings of community and local identity were, as stated above, largely absent from regional and local policies. However, as the case study areas had all undergone intensification, it is possible to comment on whether this outcome had been achieved, regardless of whether it was a local policy aim.

Again, the findings seem to be different for mixed-use centres from those for residential suburbs. This division was anticipated in the research presented in Chapter Four, where several commentators speculated that arguments about vibrancy and culture relate more to urban cores than to residential suburbs (Breheny, 1996b; Troy, 1996). The town centres where retail and employment activity had been concentrated did offer more cultural and entertainment facilities at the end of the study period, and were used more intensively during the daytime and in the evenings. Planning applications and approvals for restaurants, bars and clubs in all three boroughs have increased over the study period. This is, the planners believe, partly due to intensification policies, but is also related to the changes identified by Troy (1996), such as alterations in social behaviour, increasing affluence (for some sectors of the population), the commodification of leisure and adaptation to the needs of tourists. Planners in Camden also felt that mixing residential uses in central, commercial areas had the effect of improving social conditions and building communities.

However, in suburban or predominately residential areas, councillors reported that urban intensification had a negative effect on the sense of community and local identity. They argued that residents almost always wanted to retain the social profiles of their neighbourhoods, not diversify them. This usually meant they wanted more home-owning families, and not small households, sharers or single-person households. Negative attitudes were reported time and again by councillors who stressed that existing residents disliked higher density developments because they 'lowered' their neighbourhoods. The planners were particularly concerned about such values being presented through the procedures of the planning system, especially when they included racist or anti-social arguments. The findings of antipathy to intensification are completely at odds with the favourable view of the social effects of intensification in central policies.

**7.3.3.3 Does urban intensification improve safety?** - An argument outlined in Chapter Four was that higher densities of people in urban areas mean that public spaces are safer because there is better natural surveillance, both during the day and at night. In the case study boroughs

the findings were mixed, and suggest the relationship as asserted in central policy is too simplistic. Councillors thought that people felt safer in lower density suburbs where they knew their neighbours. They drew attention to the fact that people often blamed newcomers to an area for any increases in crime. Overall, there was little support for the argument that intensification in residential neighbourhoods improved surveillance, or reduced fear of crime.

However, planners and councillors reported that town centres had become more welcoming, and felt safer during the day and at night. They attributed the improved safety, and actual reduction in crime rates (in Bromley) to a number of causes, such as the introduction of security cameras, improved policing and vandal-proof materials. But they also felt that the fact that new entertainment facilities were concentrated in the centres had made a significant contribution to security. It meant that more people were attracted to the centres in the evenings and therefore the streets and central areas felt safer for everyone. Again, it is difficult to know how much of this change is due to intensification and how much is a result of the other security measures outlined above.

**7.3.3.4 Does urban intensification improve accessibility to services and facilities?** - The argument presented in national policy is that higher population densities can support local facilities and therefore improve accessibility for everyone. Also, concentrating trip-generating uses in existing centres, rather than permitting dispersal, means that there is better access 'physically' for those without cars, and more opportunities to cluster trip ends. However, determining whether intensification policies have increased accessibility is difficult. Certainly, in terms of locating new retail and employment developments in central locations, or on sites well-served by public transport, the three boroughs had all improved their performance. Some encouragement must also be taken from the fact that, in Camden and Bromley, surveys of residents found that access to shops was seen as the element of quality of life which had improved most due to intensification, followed by access to facilities. Furthermore, the fact that in Camden - the most densely populated of the three boroughs - accessibility to local services is so good (90% of the population live within 400m of a food shop), does provide some evidence of this relationship.

Yet, there is also some evidence that the arguments presented in Chapter Four concerning the nature of travel patterns in modern society are important (Healey, 1997; Handy, 1992). As stated in 7.2.4. the labour market is becoming increasingly specialised, as are leisure pursuits, shopping facilities and cultural experiences. Therefore, the assertion that centralisation or intensification will improve accessibility in absolute terms should be questioned. Nevertheless, intensification did contribute to accessibility to some facilities and services, for example to shops for everyday needs. Concentrating office employment in town centres increased accessibility to local services and facilities for those who work in them. However, intensification did not appear to contribute to improving accessibility to more specialised providers of retail, cultural or leisure facilities.

### 7.3.4 The wider quality of life impacts

The literature review in Chapter Four identified a number of impacts on quality of life which were reviewed in the case studies. First, there was the contention that **intensification leads inevitably to reductions in private space** (Stretton, 1996; Evans, 1988). The case studies provided some evidence of this trend. New houses were smaller than the average size of the existing stock. The most common size for new units was two bedrooms. Conversions and subdivisions also meant new units were smaller than previous dwellings<sup>6</sup>.

Planners felt the overall trend for smaller units contributed to sustainability by making the best use of resources and meeting the needs of one and two person households. They felt that it gave more people access to housing, because smaller units are usually more affordable. The only place where reduced private space was a problem was in Camden, where a shortage of larger houses left some families in housing need, but the problem was related to affordability rather than an absolute lack of larger houses.

The second suggested impact was that in intensified areas, because of the reduced need to travel and switches to non-car modes of transport, the **impacts of traffic such as air pollution, noise and a generally poor environment for cyclists and pedestrians would be improved**. In the case studies, however, no evidence of this benefit was found. As noted, the predicted link between intensification and reductions in traffic was not verified. In fact traffic volumes, and therefore traffic impacts, increased in all three areas. Conditions were so bad that air quality, noise, parking problems and road safety were ranked as the main detriments to quality of life by residents in all three case study boroughs.

There was also a related suggestion in Chapter Four that **public transport would be more viable because of increased population densities**. In all three case study boroughs services to centres had increased over the period. However, average waiting times for buses had also increased and average bus speeds were slower. Residents also reported that public transport was frequently overcrowded and unpleasant to use. Extreme cases were reported in Camden, where trains sometimes became so overcrowded that stations had to close down until people had dispersed. Overall, the consensus was that while the number of services might have increased, because of traffic congestion and increased numbers of people, the quality of public transport has worsened.

The fourth impact that was suggested related to whether intensification would lead to **reduced access to open space**. No proof of this impact was found in the case studies. In fact, the total amount of public open space increased in all three boroughs over the study period (by 6% in Harrow, 3% in Camden and 22% in Bromley). In Camden, because of high building densities,

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<sup>6</sup>Bromley approved a high number of conversions and subdivisions over the period and justified this because the demand for larger houses was diminishing. Planners felt that if large houses were not subdivided or converted into flats then they would be lost from residential uses altogether, because they were ideal for offices, small private educational establishments and so on.

there were some localised shortages. In these areas there is little chance that any new open land will be provided. The LPA suggests implementing temporary greening schemes on undeveloped land, but cannot guarantee any long term provisions. There have also been some losses in unofficial open space over the period which are difficult to quantify. However, the overall success in the three boroughs in protecting public open space was credited to strong policies in local plans, and the wide understanding in both the planning and development communities of the policy status of MOL, land in the green belt and public open space.

The final impact was an alleged relationship between mixed-use and higher density developments and **bad neighbour effects**. There is some evidence of this relationship in the case studies. In Camden, for example, there were a higher than average number of complaints about noise from commercial and entertainment sources. In Harrow and Bromley, there were increases in complaints about noise from domestic sources, and complaints about smells from light industrial developments and new food outlets. Again, determining the extent to which the problem is due to intensification and the proportion which is attributable to anti-social behaviour and changes in technology (for example the use of music equipment and car alarms) is difficult. But there is no doubt that intensification, especially in mixed-use areas, did increase the incidence of conflicting externalities.

### **7.3.5 Economic impacts of quality of life policies**

Many of the policies in place to improve economic conditions were the same as those promoting benefits to quality of life: for example, concentrating trip-generating uses in central locations, and maintaining urban populations. Therefore it is unsurprising that there is some duplication of benefits and costs, such as increased vitality and viability of centres and increased access to employment, but also reduced house prices and higher travel costs (in some instances). Similarly, improved economic conditions are often seen as synonymous with improvements in quality of life: for example stronger economies mean better access to employment and more facilities. However, some negative economic consequences borne by different parties were also identified, related mainly to costs of maintenance of higher density areas, and travel costs implied by increasing traffic volumes, and reduced traffic speeds.

### **7.3.6 Environmental impacts of quality of life policies**

The links between quality of life and environment are in some ways self explanatory: a healthy environment is a component of quality of life. However, intensification policies with quality of life aims have had mixed impacts on the environment. They have managed relatively successfully to meet the demand for land in a sustainable way. In Bromley and Harrow, by concentrating development in existing areas to improve accessibility, peripheral and greenfield sites were protected. Similarly, converting and subdividing houses to meet housing demand meant that land was used efficiently. Where higher densities were achieved in Camden there was also evidence that this facilitated the use of CHP schemes, and developments in the town centres in Bromley and Harrow were associated with environmental upgrading.

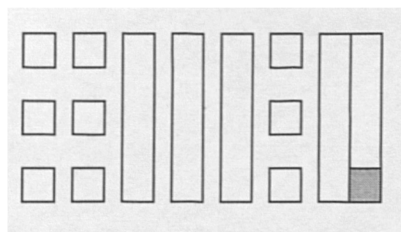
Some negative effects on the environment were also identified. In suburban locations where new houses had been built there was some loss of garden space and habitats. There were also localised detrimental environmental effects associated with increases in car use and ownership in all three boroughs, and centralised shopping and employment facilities appeared to concentrate these effects at certain times of the day, which reduced air quality and environmental quality for pedestrians and cyclists.

### 7.3.7 Conclusions on quality of life policies

As stated above, it is crucial that intensification brings about improvements to the quality of life or cities will be unsustainable, because those who can move away will do so (Smyth, 1996; DETR, forthcoming). This research has shown that in certain circumstances intensification can contribute to improving quality of life. Benefits were identified in terms of increased access to facilities and services, better shops, modernised urban centres, improved safety and increased liveliness. However, in other instances it is associated with overcrowding, reductions in amenity, increased air pollution and other traffic impacts and unacceptable wear and tear on the environment.

In the light of these findings, it is not possible to come to any general conclusion on whether urban intensification improves quality of life, except to say that its outcome is dependant on the interaction of a host of intervening variables. The type and magnitude of intensification are important, but different types and amounts affect quality of life differently, depending on how people define 'quality' in their lives. Perceptions of the impacts of intensification are also affected by how the side-effects or impacts of intensification are managed. Therefore the answer to whether intensification can contribute to quality of life is bound up with issues of locality and personal preferences. The same degree and type of intensification can be seen as contributing to or detracting from quality of life in different areas, depending on their location and the expectations about a place of its residents and users.

### 7.4 Evaluation of intensification policies with environmental objectives across the case studies



Three main environmental objectives of national intensification policies were identified in Chapter Four. These were, first, to reduce greenhouse gasses and improve air quality by reducing the need to travel by inefficient modes of transport, second to use land as a resource in the most sustainable way and third, to permit developments at densities high enough to facilitate the use of energy-efficient technologies, such as CHP. To achieve these aims a



package of policies was presented, which included focusing development in locations which reduce the need to travel, or permit a choice of transport modes, resisting development on peripheral and greenfield sites, encouraging development on derelict and underused land, permitting higher densities where appropriate and encouraging mixed-uses. Policies were, however, clear about the need to avoid town cramming, to protect urban open space and to respect the urban environment and its ecology.

### **7.4.1 Inclusion of national environmental policies and objectives at the regional and local level**

Although the national intensification policies with environmental objectives are the most clearly stated of all central objectives, their interpretation at the regional and local level is far from comprehensive. Regional policy embraces most objectives raised in national policy, but they are less clearly specified and less detailed, with the exception of the latest guidance (GOL, 1996). Regional guidance throughout the period concentrated on preventing scattered development, resisting development in the green belt and protecting good agricultural land. Recently, London-wide policies have addressed the issue of reducing transport emissions through intensification.

Local policies varied considerably between the boroughs. Camden's environmental policy stance changed in emphasis over the study period. The local plan was comprehensive in its coverage of policies to make the best use of land resources, but contained few policies relating transport to urban form. The new UDP has almost total coverage of national and regional policies. It advocates high densities at transport interchanges, locating trip-generating developments in areas of high public transport accessibility, developing schemes to use derelict and underused land and promoting energy efficiency.

Harrow's plans contain policies to restrict development in the green belt, develop vacant sites that are detrimental to the amenity of the neighbourhoods and allocate new employment-generating developments in existing centres to reduce travel. But this does not represent comprehensive coverage of either regional or national policy. There is no official local policy of permitting higher densities at transport nodes (even though the LPA had tried to implement this subsequently), and very little coverage of PPG13 policies.

Bromley's plans had even fewer intensification policies with environmental objectives. The local plan and UDP only covered issues of green belt protection and assessment of planning applications for traffic generation and the potential availability of public transport. The UDP does not contain any policies for increasing densities, using infill land or achieving energy-efficiency. In fact, almost all environmental policies in Bromley's plans resist development in urban areas and stress protecting urban open space and resisting higher densities. The plan is also markedly opposed to mixed-use.

### **7.4.2 LPAs' success in locating development in accordance with their environmental objectives and policies**

As explained, policies to achieve environmental objectives take a number of forms, and policy success varied between the different aims. For example, making the most of existing urban form was successful in all three case studies (see 7.3.4). Conversion, extension and subdivision activity was high throughout the study period, and vacancy rates in housing were relatively low (2.7% in Harrow, 5.9% in Camden and 1.45% in Bromley). The LPAs also performed well in using derelict and underused land. Bromley was so successful that it has no land classified as derelict. These results were facilitated by high demand for land and profitability of house conversions, subdivisions and extensions. The boroughs had also become progressively successful at focusing trip-generating developments in existing centres (although in Bromley's case this was not for environmental reasons). However, as has been seen, national objectives to encourage higher densities and secure mixed-use were far less successful. This said, Camden had made a significant step in permitting higher densities and car-free housing developments.

### **7.4.3 Environmental policies' success in meeting their aims**

**7.4.3.1 Does urban intensification reduce the need to travel?** - The main tenet of PPG13 (DoE and DoT, 1994), and of national intensification policies, is that urban intensification reduces the need to travel. Chapter Four presented research which provided evidence on the relationship between higher densities and reduced travel by emissions-inefficient modes of transport (ECOTEC, 1993; Newman and Kenworthy, 1989; Fox, 1993). However, other research questioned this evidence, and presented evidence that other factors were important in determining travel demand (Stretton, 1996; Rooney, 1993). The overall conclusion was that policies which advocated dispersed concentration, but not necessarily centralisation, were likely to be most beneficial, but that they should be coupled with policies to manage demand for car travel, and to make other modes of transport more attractive (Owens, 1994).

In the case studies the relationship between intensification and density was explored by comparing data on travel patterns over the period and gaining insights from planners. As seen above, the data does not enable a correlation between intensification or densities and travel patterns *per se*, but illustrates general trends. Each of the case studies provide different insights into the relationship between intensification and travel patterns. However, Camden appears to be following almost all the planning requirements set out in national policy to reduce trip-generation, so it provides the best 'test case'.

Camden is a densely populated borough with a high concentration of mixed-uses, which means that accessibility to many facilities and services is good for those who live and work in the borough. It also has low levels of car ownership (43% of households have access to a car) and is well-served by public transport. Furthermore, the LPA has successfully implemented higher density developments near transport nodes, and has approved car-free housing schemes. Given these circumstances, Camden should, according to national policy, be achieving benefits in

terms of trip-reduction. But traffic volumes on almost all routes in the borough have increased over the study period and traffic was reported as the worst element of life in Camden by residents in two separate surveys (LBC, 1994; DETR, forthcoming). The borough's traffic problems are related significantly to through traffic and people commuting into the borough for work. In fact, more people work in Camden than live there. Conversely, half those who live in the borough work elsewhere.

These findings support arguments that the relationship between density and urban form implied in policy may be rather simplistic (Owens, 1991; Breheny, 1995; Handy, 1992). In terms of work-related travel, Camden is clearly part of a London-wide and regional employment market. Thus the effects on work travel are similar to the findings on accessibility to employment: whilst trips may be reduced for some locally provided jobs, there is unlikely to be any discernible changes for more specialised employment. The same arguments apply to leisure and shopping trips. Whilst trips may be reduced for local needs, such as food shopping, there is no guarantee that people will not travel further for different shopping experiences and leisure pursuits. Furthermore, the amount of traffic passing through the borough is likely to be unaffected by any changes in accessibility within it. And, while traffic remains at the current high levels, the environment for pedestrians and cyclists is so poor that the modal shift predicted in national policy has not happened. Even given these findings, the LPA still believes that promoting concentration of development and resisting dispersal is the most sustainable urban form. In effect, it is still advocating the theoretically most sustainable form of development: a pattern of concentration in a number of centres.

Planners in Bromley and Harrow too are now turning their attention to these policies. However, planners in Harrow felt that improving the capital's traffic problems was a long-term aim, and agreed with writers such as Breheny (1995) in accepting that urban intensification is just one component of the solution. They conceded that, even with these land use policies in place, there were still major problems in overcoming car culture and educating people about the strategic impacts of car-use<sup>7</sup> (Nicholas, 1994). Planners in Bromley and Camden held similar views, and both LPAs are introducing radical sustainable transport policies in the near future<sup>8</sup>. Overall, the planners accept that altering existing travel patterns is extremely difficult, but feel that by halting the development of trip-generating developments in peripheral locations and concentrating new development in existing centres they are at least setting the infrastructure in place so other trip-reducing policies can have an effect. At the very least planners thought that most new trip-generating facilities were accessible by a variety of modes of transport, even if currently they also attracted more cars.

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<sup>7</sup>For example, the LPA still had not managed to reduce parking standards in new developments because councillors perceive dwellings with reduced parking space to be sub-standard.

<sup>8</sup>Transport plans include policies which propose increasing priority access for buses, reducing parking availability, introducing more cycle routes and charging for residents' parking.

**7.4.3.2 Does urban intensification represent the most sustainable use of land?** - In Chapter Four several components of the sustainable use of land were identified. The first related to using urban land so that rural and agricultural land would be protected (CRPE, 1992, 1996; Elkin *et al.*, 1991). Bromley and Harrow were both largely successful in managing to stave off development in their green belts, although both boroughs permitted some development there over the study period. As the period progressed, both boroughs adopted stronger policies to protect their green belts. These belts are seen as an important mechanism in fending off increasing development pressure, especially in Bromley where improved links to the Channel Tunnel have increased demand for land for commercial uses.

Intensification policies also advocated using vacant and derelict land, and all three boroughs implemented this policy successfully. In Bromley there is no land classified as derelict and in Harrow only 0.1 ha. Camden also managed this policy well, but still has some underused land awaiting development. How much of this success is attributable to planning policies is hard to say. The boroughs all have strong land markets and developers are keen to find any land to build on. This said, policies to restrict peripheral development were seen as levering investment towards less desirable urban land, and planners in Camden and Harrow believe that intensification policies, coupled with some financial support, made derelict land viable.

In central policies there were warnings that, by developing within existing urban areas, urban open space and habitats could be lost. If this was allowed to happen, then intensification would be seen as unsustainable (DoE, 1992a). However, as stated above (7.3.4) evidence from the case studies shows that the amount of public open space increased over the study period. Planners attribute this to the fact that almost all locally valued land was defined in local plans. Therefore, green chains, MOL, green belt and public open space are all well protected in policy. Planners in Bromley reported that there had been applications to build on protected land in the late 1980s, but the number of applications had decreased in the 1990s. They concluded that this may be one way in which the plan-led system has strengthened the value of the local plan. Similarly, in Harrow, development in gardens and on infill sites in the late 1980s meant there were some losses of habitats, but local policies have now been strengthened. In Chapter Four the conclusion was reached that 'the important issue appears to be to distinguish between land which is seen as underused or derelict, and that which has some community or ecological value' (4.4.3.2). It appears that, in the case studies, this balance has been largely achieved.

**7.4.3.3 Does urban intensification facilitate energy-efficient technologies?** - There is some evidence that higher density developments, such as those in Camden, had facilitated the use of combined heat and power schemes. Camden achieved some high density new developments over the study period and in some of these schemes the use of CHP schemes was facilitated. Energy-efficiency in many forms had been a policy priority in Camden, especially in the new UDP. But the LPA's approach is to make the most of the existing built form and introduce energy-efficient design into new buildings, rather than manipulate built form to fit new

technologies. Harrow and Bromley, however, did not make the link between higher densities and energy-efficient technologies in their UDPs, although they are both now considering strengthening policies on energy-efficient building design in UDP reviews. None of the boroughs considered CHP or other technologies as criteria when making decisions on planning applications, neither did they compare the energy-efficiency of potential alternative developments on any given site.

### 7.4.4 The wider environmental impacts

Other environmental impacts of intensification identified in Chapter Four were the loss of greenery in towns, the effect on the local built environment brought about by upgrading, and environmental wear and tear. First, on the issue of **losses of greenery**, there were mixed findings. There had been significant losses in Harrow over the period, especially in suburbs where backland and infill development had meant the loss of trees and shrubs in gardens and in public spaces. This deterioration was curtailed by the introduction of stronger policies protecting the leafy character of the neighbourhoods, and policies to ensure that new developments have a strong element of landscaping and greenery. Camden also managed to protect its trees and greenery. The borough is densely built-up, and new developments have tended to be at higher than average densities. Nevertheless, Camden still has only slightly fewer trees per hectare (35.26) than Harrow, and a third more than Bromley - the 'clean and green' borough. The LPA believes that careful design and high landscaping standards have helped to achieve this figure, as well as protection of trees in MOL and public open spaces. Overall, the conclusion is that intensification can, if not carefully managed, lead to losses of greenery, but if landscaping and planting are given priority from the outset of proposed developments, and policies are prescriptive about standards, then losses are not inevitable.

There was also the contention that **intensification could have an upgrading effect on the built environment**. Unsurprisingly, this is totally dependant on location, type and quality of development. A generalisation from the case studies is that development in centres was usually perceived to have a positive effect, especially in those areas which had subsequently implemented landscaping and urban design improvements. However, in the suburbs, infill developments were often seen as being of a poor quality and having a detrimental effect on the environment. There were obviously exceptions to this and, once more, the importance of defining the type of intensification acceptable to local residents and users of given locality was the key to determining whether the effect of intensification was upgrading.

Finally, there is no doubt that increased intensification does lead to **increased environmental wear and tear**. Councillors in all areas reported complaints of litter in the streets, roads which were in poor states of repair and clutter from food outlets. The problem was at its worst in Camden, where the LA found it difficult to keep pace with maintenance and cleaning. This

problem was being addressed in all three boroughs, and planners and councillors felt that better management was the solution<sup>9</sup>.

### **7.4.5 Economic impacts of environmental policies**

The intensification policies prescribed to meet environmental objectives overlap considerably with those to achieve economic performance. Policies to consolidate uses in urban areas, refrain from peripheral development and maintain population densities to meet environmental aims also serve to meet economic objectives. Many of the economic impacts have already been identified; it is worth noting them here to illustrate the mutual benefits and costs.

By restricting peripheral development planners believe that a contribution was made both to enhancing the vitality and viability of town centres and to improving access to employment in the retail and office sectors. The consolidation of centres and maintenance of population densities also contributed to reducing travel costs for certain trips, although they increased private travel costs for some by contributing to congestion and reducing speeds. LPAs are also faced with higher maintenance costs, due to increased environmental wear and tear.

### **7.4.6 Quality of life impacts of environmental policies**

Again, there is some overlap between policies aimed at improving the environment and those seeking to improve quality of life, and undoubtedly improving the local environment itself contributes to quality of life. However, some specific mutual benefits and problems were identified. First, consolidation of existing centres improved employment prospects by providing more jobs, and it meant they were more accessible to those without cars. Consolidation also meant that there were more facilities and services in the centres. The major drawbacks in terms of quality of life are increases in traffic and overburdened public transport, especially in centres at peak times. Because the proposed transport advantages have not occurred in the case study areas, conditions in areas which are now more intensively used have deteriorated in terms of air quality, noise, safety and convenience.

### **7.4.7 Conclusions on environmental policies**

This review has shown that urban intensification policies have three distinct environmental aims, and these have had varying success. First, the case studies do seem to support the idea that intensification is a sustainable use of land. The use of brownfield sites, especially where they were contaminated, in preference to greenfield land was clearly beneficial, and planners believed that intensification policies had played a part in diverting development attention away from the green belt and urban fringe. The LPAs also managed to protect valued urban open space, both for recreational uses and because it is ecologically important, although some losses of informal open space and habitats were apparent. Second, it also appears that high densities

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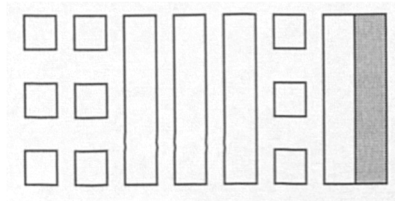
<sup>9</sup>Camden, for example, is looking to European cities for good practice in devising strategies to deal with increased environmental wear and tear.

do facilitate the use of fuel-efficient technologies. Camden's CHP schemes are an example of how technologies can be applied.

The major failure of intensification policies in the UK appears to be their inability to reduce travel demand by energy-rich modes of transport, and therefore reduce greenhouse gases. The reasons for this policy failure had not been unforeseen by planners. The rate of change in built form is exceptionally slow, so it is extremely difficult to make any significant changes in the short term, especially with the dispersed development patterns inherited from past decades. Similarly, the growth in car ownership and dispersed life patterns of people are also trends which are difficult to influence through land use planning alone.

Overall, it seems that there are some significant contributions to be made to environmental sustainability through intensification. However, there is also a danger that expectations of what it can achieve in influencing travel patterns are too high in policy. It is likely that processes outside the land use planning system will be required to maximise the potential that compact urban forms offer. Just because the infrastructure for sustainable transport patterns is in place, this does not necessarily mean that benefits will be realised.

### **7.5 Conclusions on policy substance**



The question this part of the research attempted to answer was: do the urban intensification policies that are in place in the UK lead to a sustainable urban form if implemented? Answering this question has proved difficult for a number of reasons, not least because not all central policies were implemented at the local level. Nevertheless, intensification had occurred in varying forms and degrees in all the case study areas, and therefore some general trends and findings emerged.

The first and most obvious point to make in drawing any overall conclusions is that the variety of components of intensification policies, and different specific aims, means that deriving composite conclusions is difficult. Some aspects of intensification, in some places, have contributed to sustainability, whilst others clearly have not. Yet, there are some findings which are common to all three boroughs.

First, intensification did contribute to improved economic conditions in local centres. It helped make them more viable, lively and attractive and contributed to improving the quality of life for those visiting and living nearby. Intensification also helped manage land in a sustainable

way. In all three boroughs, policies had been influential in almost eradicating derelict land, and in steering development to less desirable brownfield sites. Higher densities also facilitated the introduction of sustainable technologies.

However, there were also common disbenefits. Reductions in traffic had not happened, and this was a serious problem in all three boroughs. It not only meant that one of the main environmental objectives was not met, but also that some quality of life policies were ineffective; there were no consequent improvements in air quality or reductions in noise. Intensification was also related strongly to environmental wear and tear and other localised environmental problems. In many places, there were also hostile reactions from existing residents keen to preserve the status quo of their neighbourhoods. In such places any development was seen, by definition, as unwanted.

Intensification did make some contributions to sustainability in certain circumstances, but identifying these circumstances and relating them to policy content can only be achieved by undertaking a very detailed analysis of how certain types of intensification alter the existing assets of a given locality. This research found some crude generalisations relating types of intensification to central areas and suburbs, but even here no definitive findings could be concluded - there were exceptions which were dependent on how people valued their neighbourhoods. Indications are that far more attention will have to be paid to identifying the exact implications for sustainability of different types and amounts of intensification in particular localities.

Overall though, it seems that, unsurprisingly, intensification policies were most successful where their objectives were directly related to land use. Planning performed extremely well in meeting policy objectives concerned purely with the location of development. However, it fared less well generally (although it still had some success) when policies tried to achieve broader economic, social and environmental aims (see Reade, 1982). This is mainly because the policy outcomes are often reliant on a range of intervening variables, which are not within the control of the planning system. This finding makes it difficult to say firmly whether intensification policies themselves are the 'right' policies. It seems that by achieving more intensive development the planning system can be seen to have promoted a sustainable use of land. However, for most other aims it appears that it can provide urban forms which could potentially be used to facilitate sustainability objectives - but the resulting urban forms cannot be said to be sustainable *per se*. A term which is common in the sustainability debate refers to measures which are 'necessary but not sufficient' (Church, 1995). It seems that intensification policies could, in the main, be characterised in this way.



# **Chapter Eight: Evaluation of intensification policy implementation**

## Chapter Eight: Evaluation of intensification policy implementation

### 8.1 Introduction

This chapter reviews the case study findings in order to answer the second research question posed in Chapter One: can the land use planning system in the UK can implement intensification policies successfully? A review of literature and research in Chapter Five concentrated on whether the planning system is robust enough to take on issues of sustainability, including intensification, and implement them, or whether it requires structural or procedural changes in order to address the new sustainability agenda. A rational model of the planning system was presented which showed how policies should be translated from national to regional and local plans, and then how these policies should be used in the development control process to make decisions on applications. In presenting this model, and the review of literature on previous policy implementation research, several areas of concern were identified as being most important to the implementation of intensification policies.

The first was whether national policies were being incorporated into plans at the regional and local levels. Previous research had found that policies aiming to raise densities, implement PPG13 (DoE and DoT, 1994) type changes and promote intensification were not being adopted at the local level, and offered some indications of why this should be so (DETR, forthcoming; Breheny, 1997; Breheny *et al.* 1996; CPRE, in Winter, 1994). This was seen as a crucial issue to investigate in the case studies because if regional and local policies are not in place then the national objectives are unlikely to be achieved.

The second was whether the national, regional and local policies which were in place were being implemented through development control procedures. The review of research indicated that the way in which development control officers and locally elected members use plans and make their decisions are crucial to the implementation of intensification policies. Therefore, these processes were also investigated in the case studies. A critique of possible procedural and structural changes or additions to the planning system was then presented; it reviewed various advances in research and practice which might help the planning system to deliver a sustainable urban form via intensification. A number of new directions were suggested, and again these were investigated in the case studies.

This chapter presents the findings from the case studies in relation to these areas of concern. The analysis of the findings adheres to the research approach presented in Chapter One, and views the findings using a number of conceptual theories. Following Morgan (1986) and Barrett and Fudge (1981) the research acknowledges that the selection of explanatory theories is just one interpretation of the findings, and that the problems of process and implementation can be constructed in a variety of ways. The explanation of events which is presented

represents an attempt to construct the main issues surrounding urban intensification processes in these case study boroughs at this time.

### **8.2 The translation of national policy guidance into regional guidance and local plans**

The key areas which were investigated in the case studies were, first, whether central policies were being translated through the tiers of plan-making and included in local development plans, and second, if they were not, then what were the reasons for non-inclusion? The first point to make in answering these questions is that intensification policies are diverse, and require a number of processes to be implemented. The different aspects of intensification policy were included to varying degrees in regional policy and in local development plans. The specific coverage of different policy areas in each borough was explained in Chapter Seven, but some general trends were clear.

#### **8.2.1 The translation of national policy guidance into regional policy guidance**

The translation of national policies to regional and London-wide policy was relatively good, but some key issues were excluded. At the start of the study period regional guidance was so brief (consisting of a letter from the SSE) that very little policy guidance on intensification can be drawn from it. However, by 1994 regional guidance was very comprehensive and contained specific directions for the development of urban form (DoE and South East Regional Office, 1994). Yet, even in the latest guidance, some policy areas are absent. There is little specific guidance on, for example, the potential of higher densities to improve urban culture or the benefits of higher densities to facilitate fuel-efficient technologies, even though these policy areas are found in national guidance. Formulation of regional guidance is also subject to considerable time-lags, with national policy prescribed in the late 1980s not finding its way into regional policy until 1994 (see Tewdwr Jones, 1994).

#### **8.2.2 The translation of national and regional guidance into local development plans in the case studies**

At the local level, the translation of both regional and national policy into development plans varied, depending on the aspect of intensification policy and the case study authority. There was a great deal of selectivity from the range of policies advocated at national level, and the reasons for inclusion and non-inclusion also varied considerably. All three case studies had their own explanations, and these are worth reviewing to identify which were unique to certain LPAs, and which were common to all three case study boroughs.

**8.2.2.1 Harrow** - Harrow included different intensification policies to varying degrees. For example, it included policies to consolidate employment-generating and retail uses in existing centres, but did not formulate policies to increase residential densities, achieve mixed-use or conform specifically to PPG13. Harrow's policies illustrate clearly how national objectives were selectively incorporated by the LPA. This is especially clear in the UDP, where each

section commences with an overview of national and regional policy. Most of this commentary relates specifically to sustainability objectives and proposed mechanisms for achieving them. However, this reasoning is not, in many cases, carried through to the policies themselves. This dilutes the power of the UDP, because in law only the policies themselves are recognised as the development plan, any accompanying text is disregarded (Tewdwr Jones, 1994).

In respect of intensification and sustainability objectives, Harrow's new UDP is an uneasy mix of a comprehensive understanding of the issues and problems combined with policies which have been compromised to reflect the distinctly anti-intensification arguments coming from those sectors of the community which have been involved in consultation processes (see also Healey *et al.*, 1988; Davis and Healey, 1983; Healey, 1990; Wood, 1982). The planners at Harrow conceded that their professional commitment to sustainability, including intensification, was very difficult to translate into policies which could be accepted by the local residential and business populations. Therefore, they were left with a plan which was well-meaning, but lacked strong policies on sustainability.

**8.2.2.2 Camden** - Camden's plans over the study period were the most comprehensive in terms of intensification policies. However, they were also the most complex, and possibly the hardest from which to gain any clear policy stances. In fact the new UDP is so complex that most intensification policies could, if so desired, be countered by other policies in the plan, devised to protect amenity or prevent over-crowding. Nevertheless, the UDP is ambitious in its translation of sustainable development principles into development control policies. Of all the case study boroughs, Camden took the least incremental approach to producing its new plan; Harrow updated its commentary, but did not significantly change its policies, and Bromley largely repeated its previous plan, whereas Camden attempted a more rational approach. It based its new UDP on principles derived from European, national, regional and London-wide policy guidance, which are all clearly set out at the beginning of the UDP. It then devised new policies, and provided sustainability rationales in the commentary.

This approach meant that the LPA developed some radical local policies which are slowing the progress of the UDP's adoption. The policy to enforce a component of residential development in all major commercial schemes, for example, was the subject of prolonged debate. Unlike the other two case study boroughs though, Camden has been able to include policies to raise densities and promote an element of mixed-use. The acceptability of these policies is, the planners believe, simply a reflection of local politics and circumstances. The housing shortages in the borough are a key concern of the local councillors, and housing associations and charities were involved in the consultation stages of the development plan. Furthermore, the borough is already built at high densities therefore more high density developments were not seen as out of character<sup>1</sup>.

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<sup>1</sup>Exceptions are some of the older residential neighbourhoods, such as Bloomsbury.

Planners also felt that the borough's residents were more receptive to a radical change in policy because the problems of traffic, homelessness and environmental stress are so clear. Therefore, the decision to adopt a new 'sustainability agenda' was seen as a new direction in planning, and as such offered a new objective to work towards. Nevertheless, the difficulty of attempting to legislate for intensification, and guard against over-development simultaneously, was clear in the UDP. Policies were very carefully worded, and some aspects of intensification policy sit uneasily with policies aimed to protect residential neighbourhoods.

**8.2.2.3 Bromley** - Bromley's plans were the least comprehensive in coverage of central government's intensification policies. Indeed, they were almost totally opposed to any of the policy measures identified in national guidance. There were no PPG13 (DoE and DoT, 1994) type policies, and density standards remain at low levels. The only significant policies advocated locating employment-generating developments in existing centres, and developing on vacant land. But these policies were included to protect residential neighbourhoods, rather than to achieve national sustainability objectives.

Again, the reasoning for non-inclusion of policies in both local plans is a reflection of the borough's character and local politics. The most influential pressure groups in Bromley are those with a conservation agenda. These groups were influential in shaping the context for the Bromley Local Plan (LBB, 1985). The new UDP (LBB, 1994) is a moderately updated version of the local plan (in fact, the draft UDP is a copy of the old borough plan, with any new policies or comments underlined). This means that the substantive issues of the sustainable development debate which have been covered in national policy guidance since the late 1980s are not included.

However, the planners at Bromley are aware that their UDP is lacking in sustainable development policies and are proposing radical changes in the UDP review papers, which will be discussed shortly by the planning committee (LBB, 1997a; 1997b). The problem is that these proposals are not so much a review but a new policy agenda, requiring an ideological turnabout from all concerned in local policy- and plan-making. The planners are aware that the changes they are proposing are likely to be controversial, but feel that professionally they have a duty to make them.

### **8.2.3 The translation of national policy guidance into regional guidance and local plans - conclusions**

So, what general conclusions can be drawn from these findings? It seems that some aspects of intensification have been translated into local policies in all three case studies. These are mainly the least controversial policies, which offer benefits at the local level, such as concentrating employment and retail uses in existing centres. However, a significant number of the key policies have not been translated into local plans; policies on increasing residential densities and achieving mixed-uses are the most obvious examples. It seems that LPAs are

selective in choosing aspects of intensification policy which they believe apply to their boroughs, and local political opinion has a strong influence in defining what is and is not acceptable.

The plans in all three areas reveal a conflict between planners' commitments to sustainability and local involvement in the plan-making process. In particular, the uneasy coexistence of policies to maximise the use of urban land are always carefully coupled with policies to resist over-development. At times, the same policy seems simultaneously open to a pro- or anti-intensification interpretation, depending on how the concept of sustainability is defined. Planners usually propose a strategic definition, taking on board issues of traffic reduction, strategic land use patterns and so on. However, local members often use more localised definitions which are almost totally environmental in emphasis, and often mean resisting development on almost any piece of land.

Perhaps some conflict within the plans is not surprising given that they are largely the product of a consensus-forming exercise in a modern society which is generally recognised as being 'pluralist' or 'fragmented' (Healey, 1997; Wolsink, 1994). As Healey states '... the culturally homogeneous community with a common 'public interest' has been replaced in our imagination by the recognition of a diversity of ways of living everyday life and of valuing local environmental qualities.' (*op cit.*, p.32). In fact, some commentators have gone so far as to suggest that contradictory development plans are an inevitable product of a planning system dominated by interest bargaining. Healey argues that development plans '... claim to offer a democratically acceptable machinery for defining the collective interest in environmental issues in places, at a time when social heterogeneity and cross-cutting social cleavages make reaching an agreement democratically an increasing problem.' (Healey, 1995, p.252). These descriptions have some resonance with the plans reviewed in this research.

### **8.3 Are the intensification policies which are in place being implemented?**

After considering whether policies had been translated into local plans, Chapter Five then reviewed what happened to policies in the development control process; in particular it looked at how development control officers and locally elected members used the development plan, and how they came to decisions on applications. It drew attention to the fact that development plan policies should have primacy in the new plan-led era, and therefore concluded that if intensification policies are in place in local plans, then they should be considered in every application.

#### **8.3.1 Intensification policies in the hands of development control officers**

**8.3.1.1 Development control officers' use of development plans** - In the case studies it seemed that the new plan-led era had the predicted effect of focusing debate around plan preparation, and shifting the emphasis away from individual applications (Edwards and McCafferty, 1992; Edwards and Martin, 1991; Taussik, 1992). This said, because the resulting

plans were complex and open to different interpretations, there was still considerable conflict over certain planning applications<sup>2</sup>. However, significant changes in the primacy of the plan were not noticed. In fact, the planners reported that, at appeals, the inspectors were more likely to give weight to strategic issues or national policy than to local policies. In several cases, this meant local policies had been overridden to allow more intensive developments, either to meet housing requirements, or because the inspector felt that development plan policies were unduly restrictive. In these cases, the ability to refer to 'other material considerations' had been used. However, even at appeals, none of the planners could recall issues of intensification being explicitly linked to sustainability. In fact, they felt the inability to translate the concept of sustainable development into legally enforceable criteria was a critical constraint to implementing sustainability policies.

The review then turned to look at how development control officers use intensification policies when making their recommendations on a planning application. Chapter Five presented Underwood's (1981) research, which suggested that development control officers adopt a 'shared ideology' with respect to dealing with different types of application, and that officers rarely referred back to the development plan, and used a short-hand set of standards and policies, along with other 'soft sources' of information, such as negotiations with applicants, discussions with colleagues and precedents set by previous decisions (see also McLoughlin 1973; Davies *et al.*, 1986; Reade, 1982). Underwood concluded that development control officers develop an 'in house' response and rarely have time to stand back and see how their individual decisions impact cumulatively (see also Whitehand, 1989).

This research found some similarities with Underwood's findings, but also some distinct differences. Within each borough, planners had developed a 'shared ideology'. They had developed short-hand check-lists to enable them to deal with applications in a consistent manner. They also used 'hard' policies such as numerical standards far more than descriptive policies. Planners almost never referred back to the commentary that accompanies policies in development plans. These findings are significant for intensification policies, as numerical standards are often supposed to be used only as guidance, and policies stress that decisions should be made in the context of surrounding development. Nevertheless, the same guidance standards are often applied for all developments, and these are frequently lower than surrounding densities. Also, in the plans in the case studies, information on sustainability is often given in the accompanying commentary, but is not translated into policy statements and therefore is not used as a reason for recommending more intensive development.

Where the findings differed from Underwood's were in the assessment of planners' attitudes to the cumulative effects of their decisions. They were keenly aware that the urban forms resulting from their decisions were having implications for sustainability, and were appreciative of the

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<sup>2</sup>Examples are policies dealing with aspects of intensification, such as increasing densities, or reducing parking standards in Harrow and Bromley.

need for a way of understanding the cumulative impacts. The problem is that no such mechanisms exist to enable them to do this. The sustainability agenda has elevated the importance of individual decisions by development control officers, and has raised their profile within the planning authorities, but all the case studies showed that planners wanted better monitoring of their decisions to give them an understanding of how they were progressing.

**8.3.1.2 Development control officers' ability to incorporate sustainability principles in planning decisions** - Underwood (1981), McLoughlin (1973) and Healey and Shaw (1993) all suggested that planners may have actually have a considerable amount of power, and be able to implement their own policy agendas, or manipulate policy at the local level, or give certain interests more weight than others. This contention is interesting in the case of intensification policies. It was clear that all development control planners were aware of intensification arguments and were attempting to implement the 'sustainability agenda' stated in national policy within the constraints of the local policy framework. In fact, there was a strong consensus among the planners from all three boroughs on their attitude to intensification, which appeared to have been formed primarily through professional networks of planners in London who meet regularly to discuss common planning issues and appropriate planning responses.

The success that planners had in translating this agenda into development patterns was mixed. On one hand planners were able to bring wider issues in to local policy development discussions. This was clear in Bromley, where planners developed UDP review papers which were based on the national intensification agenda, even though this was against local feeling. On the other hand planners appeared to have little success in actually influencing decisions in respect of this agenda. This was seen as frustrating for planners, who are trying to implement 'bigger' programmes than local councillors (Greed, 1996b).

Planners had developed many ways in which they tried to promote their strategic view. They often held informal negotiations with applicants on issues such as density, in order to establish the fine line between a move in the direction of sustainability and what would be accepted by locally elected members. However, there was clear frustration at the lack of success in communicating strategic issues to locally elected members. For example, one planner reported that he was pleased that the appeals system had permitted higher density development in the borough because this had forced members to be more flexible, and meant that they had to consider the prospect of an appeal when making future decisions on densities (Healey *et al.*, 1988).

Nevertheless planners were conscious of the prevailing anti-intensification opinions of local residents, and there was no doubt that this stifled attempts to recommend approval of more intensive development. Many of the planners agreed that, to avoid conflict on a day-to-day basis, they always applied guidance standards, even if sometimes higher densities would be appropriate. Because of these constraints, many planners tried to influence thinking and



practical changes by working outside the planning system in their spare time, by getting involved in Local Agenda 21 or other sustainability pressure groups. Most felt that these liaisons indirectly advanced planning causes too, by increasing public awareness of sustainability issues.

### 8.3.2 Councillors and decision-making

The review of the treatment of intensification policies by local councillors speculated that, because they see representing their constituents as their main aim and because, in previous research, residents' views were characterised as being anti-intensification, then councillors themselves might be more likely to resist intensification than professional planners (Whitehand, 1989). The case studies largely reflected this view, although, as would be expected, political differences and local circumstances meant that councillors priorities varied<sup>3</sup>. Nevertheless, the characterisation of councillors seeing representing their ward constituents as their main priority is correct. One councillor explicitly stated that the views of existing residents should override the needs of prospective newcomers.

Councillors had varying knowledge and opinions about national planning policies. Some were extremely well-informed, and addressed issues of intensification and sustainability when they considered applications. Others were completely unaware of intensification policies included in national strategies and PPGs, and had never considered intensification as a concept. Others again understood policies, but did not believe they applied to their borough. As one Harrow councillor explained, some intensification policies had been included in the UDP as a 'gesture towards government guidance', but were not taken seriously in decision-making because they applied to inner London boroughs where densities were already higher. Conversely, a councillor in Camden reported that intensification policies applied more to outer London boroughs, because they had more spare development capacity. Where councillors were familiar with the concept of sustainability, they often applied it at a very local level to mean no more development of any kind. Few, with the exception of a minority of councillors in each borough, related it to concepts such as reducing parking spaces or raising residential densities.

The outcome of the councillors' perceptions of sustainability was that in most cases they made decisions on planning applications in relation to how they affected the borough's residents at the local level. This meant strategic arguments held less weight than local issues. It also meant that arguments about matters such as trip and emissions reduction, which are stated clearly in national guidance, regional guidance and in two of the local plans were rarely considered at individual application level. In this way, councillors were able to pick and choose which parts of the development plan they deemed important, and which aspects they ignored. Overall, it means that councillors are not fulfilling the quasi-judicial role which they officially have on

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<sup>3</sup>In Camden, for example, housing shortages meant that some councillors were in favour of increasing housing densities. These councillors, however, were those who lived in the wards with the worst housing problems.

planning committees, to ensure that decisions are made in accordance with planning policy, but are giving weight to local concerns. Planners in Bromley were so worried about this that their Chief Planning Officer produced a booklet for elected members on the planning committee, explicitly reinforcing their quasi-judicial role, and stressing the importance of strategic considerations.

These tendencies have also been noted in national research into the role of councillors. In fact, one of the recommendations of a national study was that the National Code of Local Government Conduct should be revised to reinforce the councillors quasi-judicial role and the significance of the development plan (Zetter *et al.*, 1997). In particular the report stressed that 'approved planning policies are the embodiment of the public interest' (*op cit.*, p.84-85) and argued that any departures from approved policies should be seen in this light. The problem arises in places like Bromley, where national policy guidance and local policies are contradictory. In such cases it is unsurprising that local representatives tend to give weight to local policies.

In this policy climate it is difficult to see how any intensification policies could have been implemented over the period. However, there have been many instances where applications which constitute intensification have been seen as beneficial at the local level, and have therefore been permitted (see evaluation tables in Chapter Six). Here again, it is crucial to distinguish between the different types of process which constitute intensification, and to highlight the relationship between policy substance and implementation.

In general, the aspects of intensification which are commonly seen to be beneficial at the local level are usually approved. For example, guiding new employment-generating development to existing centres was implemented successfully in the three case studies; councillors also had little difficulty with policies to convert and subdivide houses (unless parking problems were foreseen), or those to use derelict land. However, certain policies produce an almost knee-jerk reaction of negativity, especially those which raise densities above accepted local standards, or encourage mixed-use.

The reasons for these reactions are not always easy to unravel. Local amenity would not obviously be worsened by the introduction of higher density units, or mixed-use. The reactions may, understandably, be related to what increasing densities in built form have represented in the past. As Barrett and Fudge (1981) note, 'The origins and history of policy may well be a crucial factor in shaping attitudes, since *expectations* of what the policy will be about and its likely effects may derive from past debate, experiences and practice' (*op cit.*, p.272). Thus the history of higher densities and mixed-uses may have an important effect on how people react to the policy now. Indeed councillors often referred to the negative results of post-war high-rise developments and to overcrowding in their interviews; they see higher density as a reduction in quality of life.

The way in which councillors perceive intensification therefore has a powerful effect on setting boundaries of what is acceptable and what is not in a given area. Councillors give far more weight to the views of their electorate than to regional or national policy guidance. Yet not all are totally against intensification and some have a sophisticated understanding of local needs. In this respect perhaps they are well placed to make decisions on the assets of an area, and contribute their local knowledge to devising acceptable forms and types of development. However, if these decisions are to result in sustainable development, then perhaps councillors do require stronger guidance from planners about technical and strategic aspects of sustainability, and a clearer comprehension of their legal role on the planning committee.

### **8.4 Potential advances for the successful implementation of intensification policies**

The final area of implementation reviewed in Chapter Five addressed the question of whether the planning system could be supplemented by new tools to help planners implement intensification, or whether any changes need to be made in legislation to ensure that strategic issues are considered in local decision-making. Thus, new tools such as indicators and capacity approaches were reviewed, and new working structures and legal approaches were considered. The case studies provided a rich variety of suggestions of how intensification could be implemented more effectively.

#### **8.4.1 New 'tools'**

First, the development of new tools to manage the incremental effects of intensification was addressed. A variety of approaches are being developed by academics and planners to help incorporate sustainability into the day-to-day development control process. Planners in Harrow and Camden pointed out that relating sustainability to development control was a very new concept in planning, and were open in saying they had little indication of how they were performing. All the planners interviewed felt that indicators and capacity studies had something to offer, and Bromley's planners also highlighted their interest in the development of sustainability 'check-lists' for individual development control applications, and the potential of new information sources such as Geographical Information Systems (GIS). However, discussions on these techniques quickly moved to concern over the lack of monitoring data, and a genuine frustration that planners cannot find out about the cumulative effects of their decisions was evident.

Planners in all three boroughs were unanimous in identifying a lack of monitoring as the main constraint in implementing sustainability through development control. Planners in Camden reported that they would like to be able to refuse or permit applications on the basis of cumulative impacts, but currently they cannot do this. They also highlighted the fact that the Use Classes Order had made it extremely difficult to manage changes in mixed-use areas, which cumulatively were causing distinct changes in the character of whole neighbourhoods. Planners in Harrow were becoming increasingly despondent about the underfunding of monitoring and its low status within planning; they argued that they could not make decisions

on the sustainability of an application unless they know how it fits with other decisions already made. Bromley's planners too wanted to be able to make arguments about sustainability in relation to individual applications at committee, but felt they did not have the information to facilitate this.

### 8.4.2 New coalitions

Second, the issue of new working coalitions was addressed. Because of the scope of intensification issues, planners may have to form new organisations and working relations in order to bring together different aspects of urban intensification. Such aspects include transport management, town centre management and environmental health and could be aided by coalitions between departments within the LA, or with organisations external to it.

The case studies produced some evidence of such new liaisons being formed. Bromley's planning department had strengthened links with the environmental health department to help the successful implementation of multiple occupation. All three planning departments had strengthened their working relations with transport sections, and in Camden this had resulted in a new sustainable transport policy which was closely linked with land use planning. Planners had also made links with other boroughs in order to share information on sustainability, and most were also working outside the planning system in Local Agenda 21 initiatives. Camden's planners also felt that the proposed new Greater London Authority could have the potential to serve a crucial role in managing transport policies across the city, evening-out policies which are implemented to achieve sustainability, but may also adversely affect the borough's economic competitiveness (for example Camden's restrictive parking standards).

### 8.4.3 New legal powers

Finally, the review in Chapter Five suggested that, because of the strategic benefits of many of the aims of intensification, new legal powers should be incorporated into the planning system, so that these considerations are taken on board (Winter, 1994; Jacobs 1993). Planners in the case study boroughs agreed that there is currently a problem in addressing strategic issues, but felt that the current system could incorporate these issues without any structural changes. In particular, they felt that the appeals system should be sending out far stronger signs to local decision-makers on the importance of sustainability when responding to individual applications. In this way locally elected members would get a clear message about the importance of sustainability. Currently, planners do not have the confidence to fight decisions on grounds of non-sustainability because sustainability is not a clear concept in law. They felt that working within the appeals system was a more practical approach than changing legal duties so that strategic issues had to be incorporated in decision-making. Most planners felt this was an interesting idea in theory, but that it would prove totally unworkable in practice.

### 8.4.4 Potential advances for the successful implementation of intensification policies - conclusions

In short, the planners were well aware of the challenges involved in achieving sustainability. In particular they are aware that tackling it requires new working partnerships, multi-sectoral alliances and an open-minded approach to new techniques, such as indicators, sustainability check-lists and the like. The main constraint to the latter of these advances is lack of information. Planners do not have clear guidelines on what they are to achieve, they do not know the 'base' economic, social or environmental conditions in their boroughs and they do not know what they are aiming for. This lack of monitoring is a fundamental problem. As Hogwood and Gunn (1984) state, 'If policy makers have no idea about what is "going on out there" they are unable to judge whether anything relevant is happening at all.' (*op cit.*, p.22). Unfortunately, this is the position in which planners find themselves. Although advances are being made, such as the London-wide sustainability monitoring scheme by LPAC and individual monitoring programmes of single issues, such as air quality, the inability to form any composite data sets of the relationship between development control decisions and environmental, social and economic conditions is severely jeopardising advances in sustainable development.

### 8.5 Conclusion

The question which this section of the research addressed was whether the planning system could implement intensification policies. In particular, the question was posed whether the procedural structure of the planning system could cope with the new sustainability agenda, including intensification policies, or whether it was simply anachronistic and needed structural change. Overall, the main conclusion from this research is that the planning system can cope with changes in policy content and the new sustainability agenda - but only if improvements in terms of policy consistency, information, working coalitions and legal support are made.

None of the planners in case study boroughs felt there was a need for any radical change to the planning system, but they did think that sustainability could only be achieved if there was a more consistent application of national sustainability policies by all tiers of the planning system. For example, if intensification is to be taken seriously at the local level, then the appeals system should be far stricter on issues of sustainability to be in line with national policy. Also development plans should only be approved if they clearly set the context of local planning within the same sustainability framework that is provided in national guidance. After all, the new plan-led system has given more power to local development plans, and enables them to devise local solutions to strategic problems, but if policies conflict between levels of the planning system then achieving decisions in accordance with all tiers of policy is impossible.

It is also clear that the existing planning system needs to be supplemented with some new tools. It requires better information systems and monitoring to help planners, local residents and

elected members have a better understanding of how local decisions fit into a strategic context. Local knowledge can then be used positively to help devise local sustainability policies. This said, there is also a need for raising of awareness of sustainability issues and their implications for urban development and lifestyles. Intensification policies can only be implemented if they are acceptable to the local populations of an area. However, currently many individuals feel that sustainability policies do not apply to them. When these opinions are passed on to local decision-makers it is unsurprising that conflict then occurs between councillors representing residents views and planners who are trying to implement strategic policies.

Planners also need to engage the expertise of other departments within the local authority, and where possible external agents, such as transport providers and developers, to ensure that land use policies can be devised and implemented in the context of mutual understanding and support from those involved in achieving benefits or minimising costs of intensification. Again, these agencies might also need to be persuaded about the significance of policies aimed at achieving sustainability.

Finally, it seems that the objective of sustainability, and the challenge of delivering beneficial urban intensification has offered planners the chance to take a more pro-active role than before. Although, overcoming the public perception of planning as a re-active activity is difficult. Nonetheless, in all three boroughs there was a perception that recent high-profile planning successes - such as the town centre developments in Harrow and Bromley, and mixed-use developments in Camden - combined with an increasing public awareness of environmental issues in general, was helping to persuade the public and local decision-makers that the intensification agenda has the potential to deliver local benefits. Nevertheless, planners will have to capitalise fully on positive examples of intensification if they are to convince the public that urban intensification does not necessarily mean a reduction in the quality of their neighbourhoods.

# **Chapter Nine: Conclusions**

## Chapter Nine: Conclusions

The central technical and professional challenge for the planning system in the 1990s is how to assist politicians and interest-groups to realise some integration of economic, environmental and social criteria at the level of spatial strategy and detailed development decisions. (Healey, 1992, p.430)

### 9.1 Introduction

In Chapter One, the question of whether the planning system in the UK is capable of delivering a sustainable urban form via a process of intensification was posed. Answering this question was seen as important because urban intensification forms the UK government's key strategy for meeting the needs of the projected increase in households, and of achieving sustainable development patterns into the next century. But, when this research began, there was little understanding of the actual impacts of intensification. This research has contributed to understanding more about how intensification affects given localities, and about how capable the planning system is in using it to deliver sustainable development. By investigating the effects of intensification in three London boroughs, and the ways in which the planning system operates, a number of insights have been gained which help to answer the original question.

This chapter reflects on these findings and offers some thoughts on the potential of urban intensification as a means of achieving sustainable development in the future. It explores first, the limitations of the study. Second, it comments on the value of combining the findings on policy substance and process, and on the importance of locality. Third, it revisits the call, made in Chapter One, for a definition of sustainable urban form applicable to urban intensification. Fourth, it reviews the evidence from the research in the context of prevailing decentralisation trends to see if the findings offer any insight into the pressing contradictions in UK policy. Finally, it reflects on the overall conclusions which can be drawn from the research.

### 9.2 The limitations of the research

The degree of generalisation which can be based on this research is constrained by the fact that only three boroughs were studied. Also, because these boroughs were all in London, they are, in some ways, part of a specific planning context. Nevertheless, because policy outcomes and processes were studied in such depth, some interesting findings which might be relevant to other areas in the UK were produced. In particular, the findings which were the same in all three boroughs might have a wider relevance, and those which applied to only one borough might inform findings on the influence of locality, or particular local policies. Further studies are needed to establish how representative the three London case studies are.

The methodologies chosen to undertake the research had their strengths and weaknesses too (see Chapter Three). The ABS provided a clear and comprehensive means through which to manage the vast amount of information needed to deal with multiple objectives, policies,



outcomes and impacts. It allowed the required co-existence and integration of quantitative material, qualitative information and theory, and subsequently performed well in facilitating evaluations. However, it does require a huge amount of data to be 'held' simultaneously before any evaluation is undertaken. It also leaves interpretation of the data open to the researcher, with few mechanisms - other than validation by planners and councillors in the case study areas, or close scrutiny of the data by another researcher - to check the interpretation. The main constraints were limited resources, time and information, rather than any intrinsic faults of the methodology.

Similarly, the methods used to study implementation fulfilled the requirements of the research. In-depth interviews and policy reviews facilitated a detailed understanding of how policies developed, were viewed and used. Perhaps the only worry here was that, in specifying the subject of study at the outset of the interviews, interviewees may have given intensification processes more consideration than they would have done in every-day practice. However, reports from planners on how councillors used policies, and from planners on how councillors acted, served as a way of cross-checking the findings. Furthermore, comments in interviews could also be compared with development decisions and impact data.

A concluding comment is made about the amount and types of data available to the research. The data were collected from numerous sources, with varying time lags. Much of the required information was available only for a given point in time, and some critical information, such as land use changes, was either unavailable or only useful after considerable collation of numerous data sets. However, overall, the mix of qualitative and quantitative sources meant there were no significant shortfalls in information for this study. It is regrettable, though, that those involved in making day-to-day development decisions do not have the time and resources to collate and use the available data, or commission the collection of new data.

### **9.3 Findings on policy substance and process - a proposed synthesis**

Until now, because of the development of the two research questions and the use of the two methodologies, policy substance and process have been kept largely separate. This separation has been conceptually useful as it facilitated a thorough and revealing analysis of, first, the contribution that policies can make to achieving sustainable development and second, the strengths and weaknesses of the planning system in implementing intensification policies. It highlighted areas of policy success, areas of policy failure and also areas of policy non-inclusion. However, as the separate analyses progressed, the relationship between policy substance and process began to gain in significance. Explanations of a particular aspect of intensification policy inclusion in local development plans, and implementation success or failure, often depended on certain implementation processes being applied differently in different localities. Likewise, problems of policy content could often be overcome by advances in policy processes.

In this chapter, therefore, it is suggested that if any lessons are to be learned from this research, and an answer offered about the capability of the planning system to deliver sustainable development, then the findings of the two strands of research need to be considered together. In this respect, this research draws on the work of Barrett and Fudge (1981), who argue that policy substance and process are not separate entities but part of the same 'policy action continuum'. They argue that policies are not merely made and then implemented over time, but are negotiated, manipulated and reworked<sup>1</sup>. In this way, they claim, 'At any point in time it may not be clear whether policy is influencing action or whether action is influencing policy' (*op cit.*, p.25).

This conceptualisation of the policy substance and process relationship has some resonance with the findings of this research. For example, it was clear that different aspects of intensification policies were implemented to differing degrees, and some were not implemented at all. This was because certain aspects of intensification policy were embraced by local officials and publics, while others were ignored, manipulated or disregarded. Likewise, it was clear that local policy-making processes affected which aspects of national intensification policy were included in local development plans. An understanding of how these relationships between policy substance and processes can be used to help the planning system to deliver sustainable development is therefore a key outcome of this research.

The research has also shown, though, that even a detailed understanding of the relationship between policy substance and theory will contribute to delivering sustainable development only if it is applied to a particular locality. Knowledge of locality is crucial in coming to decisions on what sustainability actually means in any given place. This research has shown time and again that urban intensification, in its various forms, can be 'technically' sustainable, for example it can recycle brownfield sites and facilitate the use of energy-efficient technology, but if this intensification is perceived as detrimental where it occurs, then it will contribute to reducing the quality of that locality. If the cumulative effects of reductions in quality are considered to outweigh the benefits of urban life, then those who can choose to leave the cities will do so; clearly an 'unsustainable' trend.

Therefore, the key to whether the planning system is capable of delivering sustainable development via intensification appears to lie in its ability to produce and implement policies which respect the interaction of process and content, and can relate this to sustainable development in a given locality. For this to be useful, however, a clear understanding of exactly how policy content and process are related is required, as is an agreed and workable definition of sustainability in relation to intensification in a locality. The next sections of this chapter help to clarify these points. The development of a definition of sustainable urban form in the context

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<sup>1</sup>Barrett and Fudge's work concentrates on the influence of negotiations in contributing to the policy/action continuum. They use a negotiating perspective to explain how policies can be subverted at the local level (Barrett and Fudge, 1981, p.25).

of urban intensification was a subsidiary aim of this research from the outset. It is also a prerequisite for determining locally relevant policy content and processes. Therefore this definition is presented first.

### 9.4 A definition of sustainable urban form for urban intensification

The definition of sustainable urban form used initially in this research derived from definitions of 'sustainable cities' and 'sustainable urban development' (Leff, 1990; Elkin *et al.*, 1991; World Health Organisation, 1992; Breheny, 1990). It was constructed from loose notions that a sustainable urban form would be one which enabled a reduction in use of non-renewable resources, was user-friendly and created a desirable place to live (Pearce, 1993).

The definition most often used alongside intensification policies in the UK, however, is that referring to sustainable development, given in the Brundtland Report as development which 'meets the needs of the present without compromising the ability of future generations to meet their own needs' (WCED, 1987). As discussed in Chapter One, this definition is easy to understand, but difficult to apply to individual development decisions. In fact, what seems to have happened in planning practice is that Brundtland's definition is used to convey the 'technical' side of sustainable development. It is most often applied to matters such as air quality, infrastructure capacity and energy efficiency. But these things are often not visible to the majority of the public (except when they become seriously detrimental to quality of life) and again are difficult to relate to individual decisions. It is difficult for planners to know how the various impacts of a development will affect local air quality, traffic volumes and so on.

Furthermore it seems that policy definitions also often overlook the relationship between (technical) sustainability and local acceptability. Although Brundtland was explicit in her definition of people's needs<sup>2</sup>, this aspect is not often addressed in intensification policies. Unfortunately, the emphasis on technical aspects of sustainable development misses the key criterion that, to be sustainable, cities have to be places that people want to live in, work in and visit. They must offer a high quality of life, and a range of opportunities for urban residents to realise their life-style choices. In this respect, cities have to offer their residents what they want in terms of facilities, housing, transport and so on. And what people want from their locality is dependant on its existing physical characteristics and also their individual socio-economic, cultural and political situations and aspirations (Healey, 1997).

It seems, therefore, that an important step towards answering the question of whether the planning system is capable of delivering sustainable urban form through intensification can be taken by using the findings of the research, and drawing from the definitions of sustainable urban development from Chapter One, to clarify exactly what sustainability means in the context of urban intensification. It means *providing urban areas which meet the criteria of being both 'technically' sustainable and acceptable to the local populace.*

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<sup>2</sup>For the full Brundtland definition of sustainable development see WCED, 1987, p.43.

How planners or decision-makers go about identifying these technically sustainable and acceptable states is still open to question, although this research has offered some suggestions (see below). Advances in assessing 'technical' sustainability may come from the use of indicators, capacity approaches, sustainability check-lists or other new tools, whilst progress in determining locally acceptable intensification may come from improved consultation procedures, perception studies, new communicative strategies and so on (Healey, 1997; Hillier, 1996). What is important is that the two distinct components of sustainability in this context are recognised, and the fact that they are by no means mutually exclusive acknowledged. Indeed, as the case studies showed, they can be complementary.

### **9.5 Substance, process, locality and sustainability**

Having established this twofold definition of sustainability, it must be acknowledged that achieving the balance between technical aims and delivering what people want in a locality is extremely difficult. The suggestion is that the findings from the analysis of policy substance and content (Chapters Seven and Eight), combined with this definition of sustainability, indicate that the planning system is theoretically capable of delivering urban forms which contribute to sustainable development through urban intensification, but that it is failing in many respects at the moment because policy processes and content are antagonistic to each other, rather than being mutually supportive.

This point can be clarified by reviewing the findings of the case studies in the light of the contradictions presented in Chapter One. These contradictions were seen as barriers to the success of intensification as a tool of sustainability and, as such, provided the reasoning for undertaking the research. Now they can be seen far more clearly as deficiencies in linkages between policy substance and process, and point to a disregard for variations between localities in national policies. Furthermore, most of the contradictions could feasibly be overcome if more careful consideration was given to the interrelation of policy processes and substance in any given place. A brief re-examination of the contradictions in the light of this reasoning will help to illustrate this.

The contradictions identified in relation to policy content stated that policies could be unsuccessful: first because the relationship between cause and effect was not always obvious; second because different aspects of intensification policies were inherently contradictory and different planning scales (local and strategic) were not in unison; third because the policies paid no attention to the cumulative effects of development; and finally because little attention was paid in policy to prescribing different types of intensification in different areas. The contradictions relating to process questioned whether planning could manage intensification to deliver the suggested benefits and ameliorate the disbenefits. In particular, the decision-making structures that are in place, a lack of resources and the need to rely on external agencies to take on certain aspects of urban management, posed problems. The ability of planning to bring

about intensification in the current socio-economic climate was also questioned (a point addressed in 9.6).

In the case studies, evidence of all these contradictions was found. There were instances where cause and effect relationships stated in policy were not apparent in practice, for example higher density developments did not always improve social conditions or reduce traffic. Contradictions were apparent vertically between scales of planning, and horizontally between different elements of the urban environment. For example, concentrating development in existing centres had the strategic benefit of protecting land on the urban fringe, but was locally unsustainable because it led to increased amounts of traffic. Achieving higher density developments in Camden was socially sustainable because it provided affordable housing, but was unsustainable because it contributed to unacceptable levels of environmental wear and tear. The cumulative effects of policies were also a problem. In Harrow and Bromley, residential character was altered by the continued development of houses in back gardens and between houses. There were instances where the type of intensification was not acceptable in a particular place.

This said, for each case in which contradictions were identified and policies were unsuccessful in contributing to sustainability, there were as many cases where policies were successful in meeting their aims and did not display any of the suggested contradictions or problems (see the evaluation tables in Chapter Six). For example, in some areas, more people were accommodated through subdivisions and conversions of houses, with no detrimental effects. More development in inner areas also meant that more employment and shopping facilities were provided, and local centres became more economically viable and socially sustainable. In these cases intensification was both locally acceptable and offered the potential to be used in a 'technically' sustainable way.

What these findings indicate is not that intensification, or aspects of it, is unable to contribute to sustainability *per se*. because of inherent contradictions or problems, but that the implementation processes have to be able to identify the type and degree of intensification that would be sustainable in any given place. They have to manage the impacts to locally acceptable, and technically sustainable standards. Again, some specific examples from the case studies may help to clarify how these interactions can help or hinder the planning system.

Raising residential densities was proposed by planners in Harrow and Bromley as a way of achieving sustainable development. However, locally elected members and the local population deemed this politically unacceptable and technically unsustainable. Local people argued that it was unacceptable because it detracted from their amenity and cumulatively changed the character of their residential areas. Local opinion was also that further development was technically unsustainable as it meant building on green space or gardens. Planners, however, took a more strategic approach and argued that the boroughs had spare development capacity in

existing residential areas and that continued development could provide affordable housing and protect the green belt and other rural land. Nevertheless, increased density policies were not included in the local development plans, and they were not usually approved in the development control process.

This particular conflict exhibits many of the contradictions and problems of policy and process identified in Chapter One. There were contradictions between the local and strategic interpretations of sustainable development. These then exacerbated conflict in local decision-making. Also, because the exact cumulative impacts of higher density development are not known either by planners or residents, this leaves both parties without an objective basis upon which to make decisions. This lack of information also means that planners cannot present arguments about 'technical' issues of sustainability, which leaves decision-makers with a less than comprehensive set of facts on which to make choices. Finally, dealing with many of the potential costs or benefits associated with higher densities lies outside the remit of land use planning. So, for example, planners cannot guarantee residents that negative local impacts will not occur, or benefits be provided.

Several advances in implementation processes would help planners move closer to a sustainable outcome. First, monitoring could be improved. If planners had access to information<sup>3</sup> about local conditions they could spell out the extent of cumulative change, rather than rely on predictions designed to support one case or the other. There may well be limits to intensification, but where these lie can only be decided through a process of compromise between local acceptability and 'technical' judgements, and such judgements cannot be made if information is not sufficient. New tools such as indicators, capacity approaches or sustainability check-lists may also help. Planners also have to be able to give more assurance that the impacts of higher densities, if they are deemed appropriate for an area, can be managed. They have to understand and communicate the full range of impacts on quality of life, economic conditions and the environment, and be able to give some assurance that any benefits dependant on third parties will be achieved and any costs managed. In order to do this planners and the public have to be able to rely on co-operation by external agents and service providers such as town centre managers, public transport providers or infrastructure suppliers.

Another example, that of open space management, illustrates a more positive case of policy processes and substance being successfully co-ordinated in all three boroughs. In the literature review presented in Chapter Four (4.4.4), a key contradiction in policy substance was concerned with the loss of open space in urban areas compared with the loss of rural or greenfield sites. This contradiction was seen as a major constraint to the sustainability of the compact city. However, in the case studies, this contradiction was not evident. In fact, public

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<sup>3</sup>Development control officers would benefit from having easy access to, for example, information about the type and extent of local land use changes, and the number and scale of developments permitted in a given area.

open space that was valued for either recreational or ecological reasons was protected from development. The success of this policy is due to a combination of strong, clear policies and strict adherence to these policies by local decision-makers. Specific policies about which land to protect and which is available for development were drawn up after a combination of technical studies of land availability, ecological value and so on and surveys of public opinion to define which land was valued locally. Once these policies were included in the local development plans, they were easy to implement because they were clear and specific.

Although these examples are quite simplistic, they do illustrate some ways in which advances in policy and implementation could easily be integrated. Whilst Chapters Seven and Eight highlighted advances in each of these issues separately, it is possible here to see how matching improvements in implementation with particular policies could help the planning system to deliver sustainable intensification; many improvements could be made without significant changes to planning practices. However, these advances do require a more deliberate effort on the part of those developing plans and implementing policies to make implementation processes reflect specific policies.

This said, some other aspects of the examples presented above appear to exhibit characteristics of 'ideal' implementation models, which are familiar in policy theory, but rarely achievable in practice (Simon, 1983; Lindblom, 1959; Barrett and Fudge, 1981). The examples given above resemble, in some cases, concepts such as 'perfect information' and 'perfect compliance of agencies'. As in most implementation theory, these are recognised here as unachievable goals in absolute terms, but they do represent aspirational states for those involved in policy delivery. The examples also show where real improvements can be made and, indeed, the case studies themselves show that advances in information systems, the development of new tools, strengthening relationships with other organisations and improving awareness of sustainability issues have all been achieved.

It should, however, be acknowledged that there will still be conflicts which are impossible to 'co-ordinate away' (Barrett and Fudge, 1981). The political nature of local spatial planning should be recognised. Problems will still arise between different interests in an area and between different scales of sustainability (Healey, 1997; Davies *et al.*, 1986). In these situations, priority will have to be given either to strategic sustainability at the expense of some local conditions or freedoms, or to local interests, or to one local interest over another. In these circumstances, at least by making reasoning and trade-offs open and more information available, the decision-making processes will be clearer. That is not to say that decisions will, therefore, be uncontroversial, but at least priorities and rationales will be explicit. Ultimately, local decision-making criteria and locally agreed sustainability principles could become part of the local development plan.

### **9.6 The implications of the findings of the research in the light of decentralisation trends**

This research has looked in depth at how the planning system has managed the process of intensification and its impacts in places where it has happened. However, in Chapter One the difficulty of attempting to achieve intensification in relation to broader socio-economic and cultural trends was identified. In particular, the prevailing trend for decentralisation and the seeming dislike of urban living in the UK was highlighted (Breheny, 1992b; Davison, 1995; McKie, 1996). It is useful here to review this contradiction, and broaden out the arguments to see whether this research has shed any light on it, or can offer any ways forward for urban living in the UK.

Whilst most towns and cities in the UK experienced counter-urbanisation over the study period, in Harrow and Bromley the populations increased over the previous decade and in Camden - the inner London borough - the population fell very slightly (1981-1991), but is projected to rise by 7.4% between 1993 and 2001 (DoE, 1995c). This is extremely significant, as Camden's population has fallen every decade since 1901. Overall, inner London's population increased by 3% during the 1980s. In all three of the case study boroughs, the number of households also increased over the previous decade, and is projected to increase at a greater rate over the next decade (*op cit.*).

Thus, in this respect, the case studies are not representative of UK towns and cities. Between 1981 and 1991 the rest of the UK continued to experience a population 'cascade', whereby each level in the hierarchy of settlement size gained people from the levels above, but lost to those below (Champion, 1997). This cascade effect simply continued trends from previous decades (Townsend, 1993). So, perhaps the question should be asked as to whether London, and inner London in particular, is the tip of a re-urbanisation iceberg, or an anomaly, and whether the answer to this question has any implications for intensification policies.

First, opinion is divided on the significance of London's apparent re-urbanisation trend. There are those who believe that some of the forces of decentralisation, such as national growth in service sectors witnessed in the 1980s, have disappeared, but that many of the 'push factors' are still evident. For example, the problems of declining older urban areas have not yet been solved, nor has the desire by industrialists for 'clean' sites with efficient infrastructure lessened (Breheny, 1995). Furthermore, the majority of the population still seem to be choosing to move down the urban scale, rather than up, to more urbanised areas. Thus, some have questioned the efficacy and practicality of attempting to implement intensification policies which appear to be counter to public preferences (Davison, 1995). For these commentators intensification policies are seen as having little potential to reduce decentralisation (Breheny, 1995; McKie, 1996).

Other observers though, have interpreted the repopulation of inner London and slowing of decentralisation in general as evidence of the beginning of a broader re-urbanisation trend.



Fielding and Halford (1990) believe that the peak of counter-urbanisation in the UK was in the late 1960s and early 1970s and that the more recent population trends are a sign that most urban areas may be on the brink of re-urbanisation. Lever (1993) draws on the work of Illeris (1991), van den Berg *et al.* (1982) and Cheshire and Hay (1989), to relate re-urbanisation of the largest cities in Europe, including London, to social and demographic changes. Lever states:

...there is a theoretical reason why we might expect post-industrial cities to re-urbanise. The reasons lie in the restructuring of urban economies away from manufacturing towards personal and advanced producer services; in the changing demography of households towards single, childless and elderly households; in the changing emphasis of policy both in physical land-use planning and in local economic development; and in the changing technology of the built environment. As cities approach the end of the millennium, the oldest and earliest developed of them seem likely to redensify... (Lever, 1993, p.282)

Some of the trends identified by Lever were evident in the case study areas. Certainly the demographic changes in households were noted, and most new urban housing catered for one and two person households. Planning and economic policy too was in favour of concentrating development in previously built areas.

So, if this interpretation of London's re-urbanisation is correct, then it can be seen as the start of a trend which might be witnessed in other cities too. If this is the case then there are serious implications for intensification policies. Re-urbanisation gives planners the perfect opportunity to deliver new, higher density, sustainable urban forms, and to provide a modern interpretation of urban living to new households. The early signs of re-urbanisation in London might be a chance for those who manage the urban environment to make cities and towns both liveable and sustainable through well managed intensification. This is not to say that urban living will be a preference for everyone, and individuals may choose different residential locations at various stages in their lives. However, what it does mean is that for those who do choose to live in towns and cities, they are offered urban forms which are locally acceptable and offer opportunities for sustainable patterns of use.

Thus there are alternative interpretations of the significance of the UK's demographic trends for urban intensification policies. Some believe policies are likely to have little effect due to the continued 'cascade' of population in all but the very largest cities, others see them as a way of helping to accommodate impending 'natural' re-urbanisation in a sustainable way. Whichever interpretation is taken it does seem that for policy to attempt to make urban areas both desirable and technically sustainable can only be a good thing. Huge investments have already been made in urban areas and not to make full use of the existing infrastructure would certainly be a waste of resources. If those who have moved into inner London are showing a new desire for urban living based, in part, on an optimism of what London will have to offer in the future then planners and other urban managers have a responsibility to attempt to deliver the best of city living. Some examples from the case studies showed that urban intensification can play a part

in providing these favourable conditions, but only when development is locally both acceptable and technically sustainable.

## 9.7 Conclusions

A major outcome of the research is an understanding of how the relationships between policy substance and processes can be used to help the planning system to deliver sustainable development. The conclusions which have been drawn through the development of this understanding can be summarised as follows.

- The key to whether the planning system is capable of delivering sustainable development via intensification appears to be its ability to **produce and implement policies which respect the interaction of process and content**, and can relate this to sustainable development **in any given locality**.
- In the context of urban intensification, sustainability means providing urban areas which meet the criteria of being both **'technically' sustainable and acceptable** to the local populace. The research showed that it is important that these two distinct components of sustainability are recognised, and the fact that they are by no means mutually exclusive acknowledged.
- The planning system is theoretically capable of delivering urban forms which contribute to sustainable development through urban intensification, but it is failing in many respects at the moment because **policy processes and content are antagonistic to each other**, rather than being mutually supportive.
- The findings of the research do not indicate that intensification, or aspects of it, is unable to contribute to sustainability *per se*. because of inherent contradictions or problems, but that **implementation processes have to be able to identify the type and degree of intensification that would be sustainable in any given place**, and have to manage the impacts to locally acceptable, and technically sustainable standards.
- Emerging re-urbanisation trends give planners the perfect opportunity to deliver new, higher density, sustainable urban forms, and to **provide a modern interpretation of urban living to new households**.

Overall, the answer to the question of whether the planning system is capable of delivering sustainable urban development via a process of intensification appears, from this research, to be twofold. *First, by following intensification policies planners can help to put in place urban forms which are more sustainable in their use of land and resources than previous forms. They can also contribute to developing urban forms which promote sustainable patterns of use. But,*

*alone, they cannot ensure that these forms will be used in a sustainable way.* This finding was most clearly illustrated by the findings on the relationship between urban form and travel patterns. Planning is beginning to deliver urban forms which have the potential to be a component of sustainable development by facilitating sustainable patterns of use, but the ancillary mechanisms, such as efficient and affordable public transport, are not yet in place.

*Second, the planning system can deliver the forms of development which would be sustainable in a given place only if it can incorporate locally derived concepts of acceptability, and integrate these with policy prescriptions of 'technical' sustainability.* The development, in this research, of a definition of sustainable development in the context of intensification as one being both 'technically' sustainable and locally acceptable is therefore important. However, to achieve sustainable development the planning system requires new tools, new working relationships, better information about how it is performing, changes to ensure that all levels of the planning system are equally committed to achieving sustainable intensification and more support from other policy areas, for example policies on traffic demand, and from other agents.

Finally, it should be recognised that the planning system has only had a few years to come to terms with what sustainable development actually means, and to devise ways of delivering it. Defining sustainable development, developing policies and overcoming implementation problems all take time. Hence, national policies which were devised in the early 1990s are only now beginning to be translated into local development principles, and may truly be judged only in terms of their contribution to sustainability over the coming decades. Similarly, public perception of the implications of sustainability is also limited at present and considerable effort is required to raise awareness of the strategic implications of local planning decisions.

Nevertheless, the fact that sustainability policies are relatively new, and that planners are embarking on a period of trial and error in assessing which combinations of policy and processes will help to achieve the desired results, means that considerable attention should be paid to evaluating the outcomes now. Planning has come a long way in operationalising the concept of sustainable development since the government first established it as a strategic planning issue in 1990 (HM Govt, 1990). Similarly, the concept of urban intensification as a tool of sustainable development is only just beginning to be recognised, and its complexities unravelled. This research has, by evaluating intensification policies, and studying their implementation, advanced understanding of the contribution they can make to achieving sustainable development in the UK.

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# Appendices

**Appendix A**  
**Interviews with planners and local**  
**councillors**

### Interviews with local authority planners

The interviews were taken with planners from both development control and forward planning, or policy sections, in the three case study areas. Because of the sensitive nature of some of the issues discussed some of the planners wished to remain anonymous. Therefore they are identified only by their position within the planning department. Those who did not mind their names being used are included in the Acknowledgements. A summary of the main issues covered is presented below. The questions were structured around an informal interview schedule which was used as a prompt, or checklist. However, some different questions were asked depending on the area, and the interviews were flexible with the planners often dictating the content. The basic schedule is presented first, followed by a summary of the interviews.

### Interview schedule

Introduction: The research is looking at urban intensification policies; sustainable development, PPG13, Brownfield development targets (PPG3) and a whole range of other documents and PPGs

Research is focused around two questions:

1. Are these the right policies, will they deliver a sustainable urban form? in terms of:
  - **economic issues; support local economy due to increases in population**
  - **quality of life issues: more people, more cultural events, social integration, communities, safety, housing provision**
  - **environmental issues: reduction in travel, public transport viability, protection of land, new technologies**
2. Can they be implemented in the current planning system?:
  - **are they being incorporated into development plans? (i.e. all or some of them)**
  - **are they being translated into developments on the ground? (i.e. all or some of them?)**
    - **this I can find from monitoring**

Questions about Qu.1

- Is there any proof of these assertions? how feasible do you think they are in (borough)?
- Which of these objectives are most relevant to (borough)?
- How important is protecting the status quo in terms of built form?

Questions about Qu.2

- Research into density standards, PPG13 and intensification shows that nationally they are not being incorporated - but in (borough) they are, why do you think this is so?
- How do intensification policies get translated into development? Are densities kept up for example? or do councillors and planners revise downwards?
- Is there a general understanding of the aims of intensification policies by the planning committee?
- Have the borough's planning policies, or working attitudes practices changed to accommodate intensification issues?
- Do you think you need new 'tools' to manage intensification successfully?
- What about organisational structures, co-ordination between departments, information etc. to deal with the cumulative effects of development?
- Has (borough), in the past, made use of special incentives such as Derelict Land Grant, English Partnerships to reclaim derelict or vacant land?

## Appendix A: Interviews with planners and local councillors

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- Has Agenda 21 taken on the implementation of any of these measures, especially reducing the impacts of intensification, e.g. promotion of cycling, or education generally?

### Monitoring

- What is the situation with the housing targets in borough?
- What monitoring do you have which could help with these issues: (go through ABS)

### Harrow

#### Interview with planner from development control

Overall the new UDP is environment led, its aim is to restrict development. But development is difficult now anyway because of the lack of land. The borough has no vacant or spare land. With the exception of a few large sites, which are included in the UDP there is almost no developable land. Harrow relies on windfall sites. The borough is fairly prosperous and almost seen as 'full'. Protecting the status quo is really the main aim of the UDP.

Some aspects of policies into intensification suit our type of area. We do not use densities as such. We use the minimum and maximum type standards, which are now in supplementary guidance. In 1987 the committee changed the minimum back garden length from 10m to 15m, only one year after the adoption of the local plan which contained the 10m standard. The 15m standard has been with us ever since and is widely used.

The councillors are very wary of anything which does not comply with the standards. Even on house extensions. They love using these standards. At appeal an inspector would use them as guidance, and they are only supplementary guidance, but members almost always stick to them.

- Is there a general understanding of the aims of intensification policies by the planning committee?

Probably. But members stick to the letter of policies. Often national policies are over-ridden. Since the advent of PPG13 we have come a long way in thinking but, having said that, there are still parking standards etc. that are rigidly adhered to. The members may be a little more lenient, but they still make good use of the standards. After PPG13 came in the transport section was involved in a scheme on a central site, and tested reducing the number of parking spaces radically, but it was thrown out by the members.

Maybe on paper there is this understanding or move towards intensification, for example, there was a move to increase residential use (and densities) in town centres, but this got fine tuned in the UDP to just Harrow town centre. Members agreed through the UDP panel, and various other committees to relax amenity and parking standards, which dictate the form of development. Then a proposal for a mixed-use scheme came in, but it was rejected by councillors. The UDP picks up threads of national policy, but the members often back down on decisions. On another site for residential use we tried to restrict parking, but members will not move. They stick to the standards.

(The interviewee has the right to decide which applications go to committee, and has changed his/her position recently because the members are so rigid about the standards they apply. Before, he/she would allow cases through which perhaps did not conform to the letter of the plan, but would cause, as he/she saw it, no harm. However, members have been very strict on



## Appendix A: Interviews with planners and local councillors

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such cases. So now anything which does not conform to the letter of the guidance goes to committee.)

- Do you think you need new 'tools' to manage intensification successfully? The survey of residential areas was a new approach - how has this worked?

It worked quite well. Now its use is that the policies from it have been included in the UDP. The thinking in it is now used on a day-to-day basis in development control.

It is also referred to in every committee report. It is used to refer to maps, although it needs updating now.

- What about organisational structures, co-ordination between departments, information etc. to deal with the cumulative effects of development?

Not a problem. Although how to deal with sustainability in development control is a very new thing. We are only beginning to get to grips with it. Other London boroughs have their ideas, e.g. Merton has indicators which give a 'sustainability ranking', but Harrow does not. But it has its residential assessment scheme, which has been very useful.

- Has Harrow, in the past, made use of special incentives such as Derelict Land Grant, English Partnerships to reclaim derelict or vacant land?

No, these incentives are not relevant to Harrow as it has so little undeveloped or unprotected land.

- Has Agenda 21 taken on any of the implementation of any of these measures, especially reducing the impacts of intensification, e.g. promotion of cycling, or education generally?

It may be used to deal with the incremental effects of traffic. Traffic engineers do not deal with it.

- There has been a sharp increase in the number of appeals in the last 12 months, has this got anything to do with intensification policies? or with density protection policies being challenged?

Not really. The proportion of appeals allowed and refused had stayed the same roughly. I cannot recall urban intensification issues being important.

### **Interview with planner from forward planning/policy**

The discussion was a broader discussion about the philosophy of planning in relation to intensification.

Planning culture is such that there is a dislike of change instead of an embracing of it. Planners often feel that they are 'watching their back' rather than being bold and making substantial plans for the future. However because change is so slow, approx. 1% per annum, it is very difficult to make big changes anyway.

However, a major problem is the poor quality of local monitoring. There is a strong need to keep reviews of policy and monitoring together. Unless planners know what is happening, and there is a commitment to monitoring, then there is little commitment to sustainable

development. There is a reluctance to collect information on what is going on. Harrow is not geared up to collecting monitoring data because of budget constraints etc. The range of analysis that is needed to deliver sustainable development is not done. Attempts that have been made to quantify intensification, such as the capacity approaches, have suffered by not being based on good enough information.

In Harrow the case for intensification is poorly made. There is a strong protectionist attitude towards the suburbs. However, they should take more of their share of development. They could do so, without too much impact. But the locals and the councillors and some officers are NIMBY in the extreme.

In other areas, and in the suburbs, there is scope for extensions to meet increases in population numbers, and this is being done. Unless the small scale, incremental developments are taken into consideration then the whole picture is being missed. These small changes make a big difference to the capacity of an area.

However, until people grasp the wider claims about the environment, and realise that there has to be some change then NIMBYs will prevail. This can be destructive, as, at times it embodies deep social problems, and can be construed as racism. When this is asserted through planning it is unacceptable. Lots of changes have happened in the borough and these are mainly cultural. These are putting different demands on land use, and the people who live here need to be far more open to such changes.

In terms of policy, some draft issues papers are coming out next year, to help towards the UDP review. In terms of housing, our 1989 targets have been met, but given the existing UDP policies, the 1996 targets are still questionable. The problem is that the suburban areas think it does not apply to them. It is very difficult to get this message across to suburban dwellers. They have bought into that area and that is how they want it to stay. They do not want higher densities and certainly not social housing.

We have undertaken some SRB work. We also have advanced with Agenda 21. This does tackle transport issues etc. but usually it is preaching to the converted. The people who get involved are those who are already interested in these types of issues anyway.

## **Camden**

### **Interview with planner from forward planning/policy, with information about questions concerning implementation given by a planner from development control**

Introduction: There is land available in the borough from institutions, hospital premises etc., and vacant office floorspace. There have been several schemes to change the use of offices to residential (also to youth hostels, hotels etc.).

We have had some success in securing affordable housing through planning gain, but it is usually not on site. Kings Cross will make a contribution to affordable housing. Overall though, the members are worried about the cumulative impact of development and activity intensification. There are lots of problems of increasing hours of pubs and clubs which cause nuisance for residents. Tourist and business related activities cause the most concern.

## Appendix A: Interviews with planners and local councillors

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There are plans for car-free housing in the borough, and green plans. Members agree on this. The transport planners are also involved and have a new sustainable transport strategy. Agenda 21 is now taking off, but slowly. Although there was a good attendance to a youth conference to raise issues of urban sustainability. Parking standards are kept very low for businesses to deter commuting, and parking policies are very restrictive.

- Which of the objectives (of national intensification policies) are most relevant to Camden?

Policies to maximise housing provision are very important and the inspector has reinforced this in his review of the UDP. In particular the proposals schedule should be used more forcefully. The schedule is now more prescriptive than it was.

We also have strong policies on mixed-use, but achieving a high degree of mix is difficult. Mixed-use has not been enshrined in the UDP as we would have liked it to be because the inspector has made changes to it. So although there is support for mixed-use from central government it is getting changed, really because it is so hard to implement. We are having to settle for developer contributions for mixed-use or affordable housing, but getting that is not easy.

- Is there a general understanding of the aims of intensification policies by the planning committee?

Members regard the role of Camden as of strategic importance to London, and are prepared to accept higher densities sometimes. They are especially keen to secure affordable housing as there is a distinct housing need in the borough.

- What about organisational structures, co-ordination between departments, information etc. to deal with the cumulative effects of development?

In terms of working structures, transport needs co-ordinating. The Greater London Authority might be important for this. It really needs co-ordinating with air quality monitoring and the like. The streamlining of responsibilities is important, for example, parking standards should be co-ordinated between boroughs.

The cumulative impacts of intensification are very difficult to manage, or to monitor. We sometimes monitor, if we can, but mostly its each application on its merits. We would like more clear-cut monitoring and research so we could direct development to the right areas.

- What monitoring do you have which could help with these issues: (go through ABS)

Monitoring: We are not obliged to have lists of sites for development. There is no monitoring of derelict land. This is a problem as we would like to be able to use cumulative impact as a reason for refusal, but this is almost impossible. Although we have looked into, and used, the idea of public transport capacity. Public transport and land use policies have been in place for a long time.

The sequential test is a problem in a place like this because the metropolitan area is difficult to define. It means judging each case on its own merit again. Because transport and planning are co-ordinated then accessibility is given a lot of importance. It tends to be a very localised view of accessibility. Monitoring is not as good as it should be. It is too ad hoc, and under-resourced.

- Has Camden, in the past, made use of special incentives such as Derelict Land Grant, English Partnerships to reclaim derelict or vacant land?

We have used SRB for Kings Cross and West Euston

Any other comments, or issues. On the subject of the economic implications of intensification, there may sometimes be a negative effect, where increases in intensification may lead to less economic vitality. It is really important to keep areas mixed-use. Intensification of housing alone will not contribute to vitality.

In attempting to manage intensification we have had problems with the Use Classes Order. It is a very blunt instrument, which does not have detailed enough definitions between different types of retail, for example.

Also on the issue of planning gain. It may be acting as a tax on development in Camden. The market for converting offices into flats may be drying up partly because of our policy of securing gain for affordable housing. We need better negotiation skills, and a better way of approaching planning gain and mixed-use. But the problem is that developers do not have certainty from our new plan.

## **Bromley**

### **Interview with planner from development control and planner from forward planning/policy**

- Is there any proof of the assertions made in national intensification policies? how feasible do you think they are in Bromley

At present the housing target is being met but there is always additional need. We would not contemplate building on open land of any sort. But backland development may be used. But there is pressure to utilise any piece of land. Developers always find windfall sites. Our traditional old suburban and Victorian houses have been redeveloped and these are still under pressure for redevelopment. But really planning is responding to pressures, it is not active but reactive, e.g. Copers Cope is accessible and high density, so now we are suggesting reducing car parking standards. We have to take a new line. The problems are that design and amenity suffer. There are problems with existing parking standards, they make design worse. They mean that every new development is just surrounded with swathes of concrete for parking. Now we are looking at the very smallest pieces of land. We are good at protecting MOL etc. There are problems of getting criticised for applying parking standards.

Densities are the first thing that development control looks at. Reducing parking standards needs to be part of the whole strategy of planning and other policies, there needs to be a package of transport measures.

- Is protecting the status quo the main aim of the UDP?

Yes this is what the locals and councillors tend to think. But as planners we have to be taking things forward.

- What is the situation with density standards, or policies then?

## Appendix A: Interviews with planners and local councillors

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At the moment, developers usually start off high, then we reduce densities. Residents associations will not want densities to be increased. Developers will come in with high densities. Councillors think they are representing their residents but should not strictly be doing this. The CPO produced a booklet explaining to councillors their quasi-judicial role on committee.

In appeals density is taken alongside other issues. Inspectors look at wider issues, but development control often uses density, H7, general policy H2 over-rides it though. The other problem is that most town centres are conservation areas and this makes implementation difficult too.

- Is there a general understanding of the aims of intensification policies by the planning committee?

Maybe getting through but still highly protectionist

- Do you think you need new 'tools' to manage intensification successfully?

Perhaps a sustainability checking system incorporated with monitoring, and better communication.

- What about organisational structures, co-ordination between departments, information etc. to deal with the cumulative effects of development?

Transport co-ordination is very important. Transport are a bit behind but they are catching up - e.g. UDP parking. We have good links with environmental health and co-ordinate with DC on contaminated land etc.

- Has Bromley, in the past, made use of special incentives such as Derelict Land Grant, English Partnerships to reclaim derelict or vacant land?

The SRB area at Crystal Palace has had 14m SRB funding so in this area the residents may trade off the environment for regeneration. In terms of economic regeneration the environment always takes a back seat.

- Has Agenda 21 taken on any of the implementation of any of these measures, especially reducing the impacts of intensification, e.g. promotion of cycling, or education generally?

Local Agenda 21, the Blueprint for Bromley, lists topics. It is now increasingly being used as environmental policy. Sustainable development is embedded in words, it now needs to cascade down to implementation. Perhaps a sustainability check list would be a good idea for every development.

Negotiating at the informal stage is very useful in this respect. But as yet sustainable development would be difficult to make stick at an appeal.

- There is a distinct shift from the Bromley UDP review papers to incorporate sustainable development issues, especially transport

Mixed-use will be explored mainly in town centre locations. There is limited scope for conversion activity. The hospital site currently has housing but may have some commercial potential too.

Social housing and raising densities for social or affordable housing are politically difficult. People really do not want people living near them who are in need of social housing. This is racist and NIMBY, but it happens, unfortunately.

### Monitoring

- Have the environmental appraisals been done?

A housing monitoring survey was done 18 months ago. We are under pressure to have a framework to monitor sustainable development and to take it forward.

### Interviews with local councillors in Harrow, Camden and Bromley

The interviews were undertaken with local councillors who sit on the planning committees in each of the case study areas. In total seven responses were gained from Camden councillors, eight from Bromley and four from Harrow. The councillors were identified as being specifically interested in local planning policies and issues. The interviews focused around the questions listed below (in bold). Some were undertaken on the telephone and others were written responses. A summary of the responses is given below. The councillors are identified by a number only, but a full list of those interviewed can be found in the Acknowledgements. If no response is given for any question by a particular councillor this is because they had no comment to make.

#### Harrow

**1. Are arguments that urban intensification is sustainable used by planning officers when giving advice on planning applications at committee? If they are, then on what grounds (e.g., trip reduction, access to facilities etc.)? If not, why do you think this could be so?**

C2. I have never heard the arguments being used by officers, but there again we have little land in Harrow on which to build.

**2. Do you consider the argument that urban intensification may be more sustainable when making decisions on applications? If you do, then which issues are important? and if not, why is this?**

C1. No, it is highly questionable whether this argument is valid, and in our view (shared by all parties on the council) it is outweighed by policies aimed at preserving the outer suburban character of the area.

C2. Yes, we have to reduce travelling time or reduce the number of journeys by car. The London borough of Harrow has allowed planning and building of large office blocks and retail outlets to give employment to local people. As an outer London borough a large number of our population travel into the centre of London to work and many of these journeys are on public transport. My main concern is the building of supermarkets on the fringes of towns as it increases car journeys for shopping, and makes it inaccessible for non car owners.

C3. Yes

**3. Would you say that, broadly speaking, the current Unitary Development Plan for your borough encourages urban intensification, discourages it or is relatively neutral?**

C1. Discourages - policies aim to retain relatively low density character of the borough by prescribing minimum standards for amenity space and garden depth. Recently lower standards of amenity space and car parking have been adopted in Harrow town centre (on the basis of arguments that non-car owners are willing to accept lower standards if public transport is near the town centre) and as a gesture towards recent Government Guidance: intention to relieve pressure on the rest of the borough by providing extra dwellings in the town centre.

C2. Relatively neutral. Areas of land are clearly identified as being suitable for either commercial/industrial, residential or leisure uses. However, as land becomes more scarce we are having to move the goal posts to accommodate the increasing population.

C4. Neutral, except for discouraging development in suburbs and special areas.

**4. From your dealings with the residents in your borough do you think they generally support or oppose urban intensification? What are the main reasons for supporting or opposing it?**

C1. There is strong opposition to intensification. UDP policies referred to above were adopted in response to public outcry about pressure for backland development and back garden developments in the 1980s. Policies have been remarkably successful in stopping such developments and continue to enjoy widespread public support.

C2. They oppose it. People are usually insular, they demand their own space. We also find that wealthier residents are opposed to the building of affordable housing in and around their homes. We also find opposition when industrial units are proposed near residential areas.

**5. Any further comments:**

C1. In national terms I support maximising the development value of urban land, it is preferable to new towns in rural areas or eroding the green belt. But it is inner urban areas which already have higher density characters which should be areas of intensified development. Outer suburban areas like Harrow have a special character of their own (leafy, low density housing, parks and long gardens) which should be protected in the same way as the character of the countryside.

## Camden

**1. Are arguments that urban intensification is sustainable used by planning officers when giving advice on planning applications at committee? If they are, then on what grounds (e.g., trip reduction, access to facilities etc.)? If not, why do you think this could be so?**

C1. As Camden is an inner London borough with high property values, cost of land drives pressure for intensive development. Officers do not routinely support intensive development, although developers press for this (unsurprisingly). The sub-committee generally opposes over-intensive development and guards open space jealously, and officers often respond to this. They do stress public transport and cycle routes and accessibility for restaurants. The council is backing the idea of car-free housing developments in the central London area.

C2. Planning officers do not use this argument - rather the opposite, e.g. recommending rejection of a housing association application for dwellings on a small site. Crammed nursing homes etc. also disapproved of by officers and councillors. We have strong UDP policies for:

- a. affordable housing - as a perk from developers.
- b. affordable housing in large family sized units
- c. mixed developments; shops, restaurants and also some housing.

Trip reduction and access to facilities is never used as a reason. Though any factors leading to reduced car use are favourably received. Camden is the first borough to plan to introduce 'car-free' developments.

C3. Yes. The main issue considered in Camden is the impact of a proposal on parking. I do not believe this to be of prime importance. It is largely based on supposition, and should never be used to restrict socially affordable housing proposals. The issue of the loss of employment sites often gets raised, but I do not believe you can justify loss of potential social affordable housing - as more jobs can be created using the same land area elsewhere.

C4. The arguments are beginning to be used more frequently. We have dispensed with our policy of 'plot ratio' for commercial buildings and now rely solely on design/bulk considerations. In Camden we are also promoting car-free housing which then allows more space for development/amenities rather than residents' parking. This is more likely to be acceptable to developers and members in areas of high transport accessibility.

C5. Yes, on grounds of accessibility and trip reduction.

**2. Do you consider the argument that urban intensification may be more sustainable when making decisions on applications? If you do, then which issues are important? and if not, why is this?**

C1. I think it is a significant issue, as city sprawl does increase transport problems and car commuting. Camden bears the consequences of this in a huge in-flow of commuter traffic which pollutes the borough, and uses the borough's roads as a vast car park.

C2. No I do not. Camden council is not building its own housing so it is housing association housing which is likely to be inferred. Camden is spending time and SRB and City Challenge money on making its estates safe and more secure to live in, certainly resisting the use of every spare green space. These developers will build on backyards where possible. Camden is free from virgin land! I have never heard any of the arguments (strategic ones about intensification) used by planning officers or members.

C3. Yes. The important issues are housing, protection of the environment, jobs, imaginative development, i.e. solar heating, conservation minimisation of disruption.

C4. I personally am in favour of intensification but there need to be some caveats. The most important are good lay-outs, room sizes, amenity space, ventilation and light, then there is no reason why very high densities indeed should not be acceptable. The arguments against are strongest when open space is lost, particularly in parts of London with very little access to open space, or where that open space has some ecological value.

C5. Yes, the city centres have been deserted and only now are we realising that there is a need for building up the desirability of living in urban centres.

**3. Would you say that, broadly speaking, the current Unitary Development Plan for your borough encourages urban intensification, discourages it or is relatively neutral?**



C1. In effect, it may encourage it - in terms of the tourist industry, although there is concern about open spaces. There is opposition to loss of open spaces already established as public park areas. There are a limited amount of vacant sites anyway (apart from railway land).

C3. Relatively neutral, although personally I am greatly in favour of brownfield sites being brought back into productive use and protecting the green belt.

C4. In general I think it encourages it, for example with respect to the plot ratio issue. However, we also have policies against 'backland development'. We have extensive policies on sustainability in general, as well as transport related issues which could be used for this if necessary.

C5. Encourages it, where possible.

**4. From your dealings with the residents in your borough do you think they generally support or oppose urban intensification? What are the main reasons for supporting or opposing it?**

C1. (South Central zone) Oppose it, particularly the consequences of the tourist trade. More equivocal on housing, desperate need for affordable housing (not luxury housing). In the north of borough (up-market residential areas) residents are very hostile to intensive development. Sustainability arguments tend to be used to justify relaxing parking standards or refusing permission for development away from public transport links. I have never heard an argument that urban intensification is wholly sustainable advanced to committee.

C3. Working class people recognise the need for new housing. The comfortably housed bourgeoisie generally have a more precious approach - a pseudo-environmental concern which seems blind to the desperate need for new houses for the homeless and overcrowded.

C4. In general, I would say that they oppose it, particularly if they are from the well-informed middle class parts of the borough. They often quote our density standards back at us, even when they are not appropriate. There is an element of 'NIMBYism' in much public response to physical change in the environment as well as a fear of possible social problems arising from high density development.

**5. Any further comments:**

C1. This issue seems more relevant to suburban boroughs.

C3. Obviously we need to avoid past mistakes and not support slums for the future. However, Camden has at least 13,000 people in dire housing need, so the priority has to be housing.

**Bromley**

**1. Are arguments that urban intensification is sustainable used by planning officers when giving advice on planning applications at committee? If they are, then on what grounds (e.g., trip reduction, access to facilities etc.)? If not, why do you think this could be so?**

C1. I remember one occasion when this argument was raised specifically by officers - when we were talking about development of housing on the site of a local hospital.

C2. Officers do not tend to give such arguments. I assume this is because they would rather stick to interpreting what is said in the UDP and PPGs.

C3. Not in the UDP

C4. As a borough we do not have the land facility for large urban intensification and we have substantial green belt provision which we vigorously defend. Our planning officers' prime concern is to preserve our green belt, Metropolitan Open Land, green chain and other public and private open space and restrict further urban development generally to those parts not affected by the areas I mentioned above. As a council we regularly review our own land holdings and release any appropriate sites for development when they become surplus to requirements. At present the National Health Trust has been given consent by the government for a new hospital. To fund the scheme privately much of the surplus land around the new hospital site and redundant hospital sites will be used for housing and this will bring problems in the ability of our existing schools to cope with this intensification. Our UDP closely controls the level of habitable rooms in any development and therefore our developments are not generally cramped, and are designed to fit in with existing services and provisions.

C5. Any arguments used by the officers are usually based on densities already in existence in the surrounding areas. They also refer to our UDP and if this is followed the council can usually win its appeals.

C7. Its early days, but the UDP Review Paper 9 raises issues that higher densities may be appropriate in highly-accessible locations, perhaps with related relaxation of parking standards but I do not think this has been used at committee yet.

**2. Do you consider the argument that urban intensification may be more sustainable when making decisions on applications? If you do, then which issues are important? and if not, why is this?**

C1. On, for example, the hospital site, the issue of density was controversial as far as residents in surrounding streets were concerned. They did not wish the area to be 'lowered' through social housing. Smaller plot sizes mean lower prices in the immediate vicinity of their houses, which would make it more difficult for them to sell their houses for the prices they expect. The Hospital Trust wanted outline planning permission for building at an excessive density in order to maximise the value of the land. We took into account the need to make the building of a new hospital on a different site economically possible for the trust by allowing the density to be greater than that in the adjoining roads, but in accordance with the council's recommended density in its UDP. As councillors we need to represent the views of local residents who elect us, rather than the needs of the people who might move into the area if increased densities were allowed, or central government planning dogma. There should not be a need for increased densities since population is falling due to the low birth rate. There is a slight demographic shift towards more smaller housing units because of divorces and the ageing population. However this is already being planned for. The borough only needs about another 200 units pa. by the end of the century. Under the Blueprint for a Better Bromley the arguments for urban intensification will be put forward in planning reports, but I doubt if they will be particularly relevant to the actual situation in Bromley.

C2. I have not done so in the past, but I dare say I will now in future.

C3. No because such policies are not in the UDP

C4. If we are to fully protect our green belt we must take the line that any development in our borough must be in urban areas, and quite rightly this is strongly argued as we have the transport, shopping and working areas within these confines to support this intensification.

C5. No. This can interfere with the green areas in the town that we are trying to preserve. It can also mean that certain areas will have too many children which local schools cannot cope with. Transport and entertainment facilities can also be important.

C7. Yes, as long as it is accompanied by good design. We tend to think of high density as being bad but there are many examples of well-designed buildings at greater densities than much of Bromley. The key issue is location. What might be appropriate near Bromley town centre is unlikely to be so in Park Langley or Darwin. Issues about public transport are also important.

**3. Would you say that, broadly speaking, the current Unitary Development Plan for your borough encourages urban intensification, discourages it or is relatively neutral?**

C1. Relatively neutral, but there is a strong tendency to wish to preserve the character of the spacious leafy estates in the affluent areas of the borough by not allowing 'back land' development etc. This policy is not always applied uniformly. It needs to be borne in mind that appeals to the Planning Inspectorate are possible.

C2. The UDP is more discouraging than neutral.

C3. Neutral

C4. The UDP is generally neutral in relation to intensification policies. In its strategic statement it says 'To accommodate new development where appropriate or where it is of benefit to the Local Community and London as a whole whilst conserving and protecting the green belt, Metropolitan Open Land, other open space and the character of the urban areas.' This clearly indicates a mild and balanced view.

C5. It is designed to keep down housing density as far as possible and to separate out the industrialised areas.

C7. Discourage it, but Review Paper 9 is now raising the issue.

**4. From your dealings with the residents in your borough do you think they generally support or oppose urban intensification? What are the main reasons for supporting or opposing it?**

C1. I think residents generally wish to see urban land being made use of rather than lying derelict. They oppose it where the amenities they enjoy are threatened, e.g. by overlooking, loss of light, loss of property value, or noise of traffic. They would not favour building on parks, playing fields or woodland.

C2. I suspect I have encountered more antipathy, but then again, I have little contact with residents from the urban end of the borough.

C3. They oppose it. They are NIMBYs.

C4. I would say that residents oppose urban intensification. They feel that our road infrastructure is not apace with modern development, our public transport is inadequate, our

parking provisions are poor, which in turn affects our secondary shopping areas and all those points would worsen if urban intensification were to be encouraged on a large scale and with intensification our schools could not cope.

C5. They certainly oppose it. We are the 'clean and green' borough, and this means space to live in without the annoyance of having neighbours too close by.

C7. They oppose it. For example the environment survey 1996 (not yet published) indicates greater local concern for loss of open space and local shops than meeting housing demands. Likely reasons are loss of character.

**5. Any further comments:**

C2. I have reacted positively and negatively to what you call urban intensification, however, I have not thought of it as a concept. Bromley has a wide variety of areas from urban Penge out to the green belt. Because the borough is so geographically large, my experiences of the Penge part of the borough are very limited. Bromley's UDP hardly recognises communities and their particular needs. Our current review is starting to flag up the need to look at the cohesiveness of local communities and their particular needs. I suspect that under a new framework, it will become a lot easier for officers (and members) to address the issue of urban intensification.

C4. No area can survive by saying 'we just like it as it is'. I believe that to sustain our local economy in the broadest sense and give hope for our youngsters' futures and protect our elderly people's contribution in their lives past we must continually look at the way our borough is planned. In our case it is not so much urban intensification which is the question but the constructive and imaginative use of our green belt through thorough safeguards and compliance with government guidelines which holds the key to our future progress.

C5. The committees frequently refuse applications that officers suggest for permission. However, one must always bear in mind that they may be taken to appeal and that there must be adequate grounds for those refusals.

C6. The emphasis in Bromley is on protecting the green belt rather than on encouraging using brown sites. Residents are extremely vocal in their opinions on the protection of the green belt.

**Appendix B**  
**Planning decisions data for Harrow,**  
**Camden and Bromley**

Planning decisions for Harrow, Camden and Bromley, 1987-1997

Table B.1 Planning Permissions granted

borough	1984	1985	1986	1987	1988	1989	1990	1991	1992	1993	1994
Camden	1,875	1,583	1,730	1,770	1,664	1,300	1,251	1,579	1,205	1,357	1,586
Bromley	2,516	2,463	2,580	2,270	3,119	2,641	2,193	2,102	2,069	2,153	2,222
Harrow	1,391	1,601	1,439	1,636	1,883	1,437	1,190	1,044	843	957	1,015

Source: OPCS, 1995

Table B.2 Applications granted

	1988		1989		1990		1991		1992		1993		1994		1995		1996		
	no.	fs	no.	fs	no.	f.s.	no.	f.s.	no.	f.s.	no.	f.s.	no.	f.s.	no.	f.s.	no.	f.s.	
A1																			
C	2	4139	3	6375	4	5601	1	1150	0	0	1	4140	1	6000	3	5169	4	16,147	
B	1	5585	4	8939	1	1301	1	2555	1	3159	3	10034	1	1175	2	6793	2	4500	
H	2	1873	2	3871	1	4446	2	6132	0	0	2	17099	3	10385	1	4000	1	4000	
B1																			
C	28	72665	30	04568	40	276521	35	151615	13	61815	10	88097	6	51418	12	76834	8	77740	
B	9	27451	15	55853	8	17565	6	24378	6	15731	2	6793	6	16011	3	9264	3	19752	
H	7	14732	10	34146	9	40046	6	12977	2	4765	1	17057	0	0	0	0	3	10426	
C3																			
C	19	497	12	176	7	1091	6	135	5	1	1	2	29	6	123	5	85	7	116
B	27	686	43	955	29	763	24	451	21	479	7	140	3	114	7	216	5	63	
H	35	1064	32	795	23	516	10	193	5	99	2	43	4	99	5	126	3	87	

FS - floorspace (m sq.) C - Camden, B - Bromley, H - Harrow, LRC collects details of applications of over 1000 m.sq. for A1 and B1, and 10 units or more for C3

Source: LRC and LPAC sectors use class monitoring (1988-96)

Table B.3 A1 retail uses proposed and granted by type of development in Harrow, 1993-1996

	1993		1994		1995		1996	
	gross f.s. m sq.	no. of perms	gross f.s. m sq.	no. of perms	gross f.s. m sq.	no. of perms	gross f.s. m sq.	no. of perms
change of use	6	1	240	3	208	2	185	5
extension	341	8	1151	10	718	16	457	11
new build	16381	3	10473	4	4000	1	5593	4
other	0	20	0	30	0	26	0	21
total	16728	32	11864	47	4926	45	6235	41

Source: LBH, 1997

**Appendix B: Planning decisions data for Harrow, Camden and Bromley**

**Table B.4 A2/B1 Office uses proposed and granted by type of development in Harrow, 1993-1996**

	1993		1994		1995		1996	
	gross f.s./m sq.	no. of perms	gross f.s./m sq.	no. of perms	gross f.s./m sq.	no. of perms	gross f.s./m sq.	no. of perms
change of use	1961	16	4272	16	1381	14	1318	13
extension		4	314	10	285	10	1064	9
	128							
new build	17185	3	950	4	693	2	7908	4
other	0	23	30	16	158	14	0	22
total	19274	46	5566	46	2517	40	1029	48

Source: LBH, 1997

**Table B.5 A3 uses proposed and granted by type of development in Harrow, 1993-1996**

	1993		1994		1995		1996	
	gross/net m sq.	no. of perms	gross/net m sq.	no. of perms	gross/net m sq.	no. of perms	gross/net m sq.	no. of perms
change of use	713	15	2974	18	3555	29	3427	17
extension	281	9	490	10	394	11	315	7
new build	3013	2	101	1	176	1	0	0
other	0	7	80	9	66	14	0	23
total	4007	33	3645	38	4191	55	3742	47

Source: LBH, 1997

**Table B.6 B1/B2 uses proposed and granted by type of development in Harrow, 1993-1996**

	1993		1994		1995		1996	
	gross/net m sq.	no. of perms	gross/net m sq.	no. of perms	gross/net m sq.	no. of perms	gross/net m sq.	no. of perms
change of use	2496	3	660	3	237	2	600	2
extension	148	1	36	1	188	2	2253	10
new build	1380	1	0	0	150	1	9888	6
other	5	5	0	9	15	3	15	10
total	4029	10	696	13	590	8	12756	28

Source: LBH, 1997

## Appendix B: Planning decisions data for Harrow, Camden and Bromley

**Table B.7 C3 Applications decided by the London Borough of Harrow in Harrow, 1993-1996**

conversions, change of use and new build	granted applications				refused applications			
	no of applications	no. of dwellings			no. of applications	no. of dwellings		
		existing	proposed	gained		existing	proposed	gained
1993	63	63	524	461	17	11	53	42
1994	47	37	247	210	31	21	113	92
1995	49	69	163	94	38	24	169	145
1996	65	28	239	208	44	30	107	75
total	224	197	1170	973	130	86	442	354

Source: LBH, 1997

**Table B.8 Dwellings completed by bed spaces from 1992 to 1996 in Harrow, 1992-1996**

conversions change of use and new build	number of dwellings completed					
	bedsit	1 bed	2 bed	3 bed	4+ bed	not known
1992	3	108	153	38	36	19
1993	0	61	65	25	5	105
1994	0	92	111	25	23	61
1995	6	43	106	15	13	29
1996	8	49	53	25	21	0
total	17	353	488	128	98	214

Source: LBH, 1997

**Table B.9 D1 uses proposed and granted by type of development in Harrow, 1993-1996**

	1993		1994		1995		1996	
	gross/net m sq.	no. of perms	gross/net m sq.	no. of perms	gross/net m sq.	no. of perms	gross/net m sq.	no. of perms
change of use	4045	11	2875	11	6305	17	5269	16
extension	2952	19	5051	30	8690	38	2270	18
new build	3794	7	1498	4	2616	3	5462	3
other	242	10	18	11	272	9	294	21
total	1103	47	9442	56	17883	67	13295	58

Source: LBH, 1997



**Appendix B: Planning decisions data for Harrow, Camden and Bromley**

**Table B.10 D2 uses proposed and granted by type of development in Harrow, 1993-1996**

	1993		1994		1995		1996	
	gross f/s m sq.	no. of perms	gross f/s m sq.	no. of perms	gross f/s m sq.	no. of perms	gross f/s m sq.	no. of perms
change of use	365	2	521	4	1206	3	0	0
extension	1014	3	419	3	676	6	15	1
new build	11705	6	349	3	1339	3	0	1
other	0	12	0	3	1087	10	0	3
total	13084	23	1289	13	4308	22	15	5

Source: LBH, 1997

**Table B.11 Green belt permissions by type of development in Harrow, 1993-1996**

type of application	1993	1994	1995	1996
	number of permissions			
householder extension non-domestic	17	9	19	16
new build	3	3	34	4
change of use	6	4	2	5
advertisement	0	3	1	2
conversion	0	0	0	1
other	11	3	9	2
total	37	23	37	30

Source: LBH, 1997

**Appendix C**  
**Land use trends and impacts data for**  
**Harrow, Camden and Bromley**

## Land use trends and impact data for Harrow Camden and Bromley, 1987-1997

### Profile data

**Table C.1 Population trends in London boroughs, census of population 1901-91 (thousand persons)**

borough	1901	1911	1921	1931	1951	1961	1971	1981	1991
Bromley	100	116	127	165	237	268	293	305	295
Camden	377	353	341	326	258	246	207	161	153
Harrow	24	42	49	97	219	209	203	196	195

Source: OPCS, 1993

**Table C.2 Population mid-year estimates and projections (000s)**

borough	1983	1984	1985	1986	1987	1988	1989	1990	1991	1992	1993-2001, change
Camden	175	176	179	181	182	180	180	182	182	181	7.4
Bromley	299	298	297	296	296	296	297	297	295	293	0.1
Harrow	201	204	205	206	206	204	201	201	204	205	3.2

Source: OPCS (1995)

**Table C.3 Top issues improved or harmed by urban intensification in a sub-area of Bromley**

issue	percentage
<b>improved</b>	
shops	49
public transport	27
recreation facilities	11
job opportunities	11
<b>harmed</b>	
traffic	93
noise	77
parking	77
air pollution	76
road safety	74

Source: DETR, forthcoming

**Table C.4 Top issues improved or harmed by urban intensification in Camden**

<b>Issue</b>	<b>percentage</b>
<b>improved</b>	
shops	42
local character	22
recreation facilities	19
job opportunities	17
public transport	15
neighbourliness	11
<b>harmed</b>	
parking	87
traffic	87
air pollution	82
noise	69
road safety	63

Source: DETR, forthcoming

**Table C.5 Main problems in Camden**

<b>Issue</b>	<b>%</b>
traffic congestion	41
litter, dirt in street	38
crime levels	31
level of council tax	25
pollution	23
lack of jobs	22
lack of leisure facilities	17
lack of housing, poor accommodation	15
state of the environment	10
quality of health service	8
standard of education	7
poor public transport	6

Source: LBC, 1994

**Table C.6 Main environmental problems in Camden**

<b>Issue</b>	<b>%</b>
traffic congestion	52
dog's mess	47
air pollution	44
litter	43
noise pollution	38
poor road surfaces	32
cluttered pavements	17

Source: LBC, 1994

## Economic data

**Table C.7 Gross retail floorspace (m.sq.) in town centres and out-of-town centres**

borough	in town centres	out-of-town centres
Bromley	201,500	54,674
Camden	11,408	no response
Harrow	218,957	4,631

Source: LPAC, 1995

**Table C.8 Shopping centres: national rankings**

centre name	county	1995 multiple count	1995 rank	1984 rank	1995 rank	change
Bromley	Greater London	94	24	37	24	+13
Harrow	Greater London	62	71	106	67	+39
Camden Town	Greater London	8	468	364	453	-89

Source: Hillier Parker, 1996

1995 survey based on 1396 centres; 1984-95 comparison based on constant sample of 979 centres

**Table C.9 Vacancy rates (% of total stock vacant) for industrial, retail and office premises**

borough	industrial	date	retail	date	offices	date
Bromley	no response	no response	7.0	02 93	16.00	07 93
Camden	no response	no response	no response	no response	no response	no response
Harrow	27.00	01 94	10.00	08 94	17.00	01 94

Source: LPAC, 1995

**Table C.10 Number and proportion of economically active population working within borough of residence**

borough	no. of economically active working within borough of residence	proportion of economically active working within borough of residence (%)
Bromley	6038	45.0
Camden	3430	49.2
Harrow	3731	40.2

Source: OPCS, 1993

## Appendix C: Land use trends and impacts data for Harrow, Camden and Bromley

**Table C.11 Male economic activity**

borough	total males aged 16-64	total economically active males	employees %	self-employed %	unemployed %
Camden	56,209	46,746	64.29	18.40	15.93
Bromley	92,883	82,438	73.35	17.68	8.41
Harrow	64,019	56,049	70.96	19.82	8.49

Source: OPCS, 1993

**Table C.12 Female economic activity**

borough	total females aged 16-64	total economically active females	employees %	self-employed %	unemployed %
Camden	57,145	39,185	76.80	10.76	10.95
Bromley	88,013	61,162	88.10	5.67	5.69
Harrow	61,401	42,427	86.90	5.73	6.49

Source: OPCS, 1993

**Table C.13 Economically active**

borough	economically active (1995-96) percentages	claimant unemployed, Jan. 1997, total (thousands)	businesses registered for VAT, 1995 registration rates (%)	businesses registered for VAT, 1995 deregistration rates (%)
Bromley	62.9	7.6	11.6	12.8
Camden	65.2	10.4	12.9	10.0
Harrow	68.3	5.1	13.2	14.4

Source: Stationary Office, 1997

**Table C.14 Industry of employment, 1981-1991 change in percentage working in**

borough	manufacturing	construction	banking and finance	government and other services
Camden	-3.89	-1.17	7.74	0.36
Bromley	-6.58	1.23	7.17	-0.20
Harrow	-9.32	-0.39	5.24	1.11

Source: OPCS, 1993

## Appendix C: Land use trends and impacts data for Harrow, Camden and Bromley

**Table C.15 Manufacturing output**

borough	manufacturing output (£mn) 1983	Manufacturing output (£mn) 1993	% change output	manufacturing 1991, number of units	manufacturing 1991, % of total units
Camden	470.17	391.88	-16.7	1,085	9.1
Bromley	198.11	222.90	12.5	550	8.8
Harrow	222.65	236.57	6.3	264	5.6

Source: OPCS, 1995

**Table C.16 VAT registered businesses, London boroughs, 1981-94**

borough	1981	1991	1994
Bromley	6,460	9,000	7,912
Camden	13,610	17,100	16,044
Harrow	4,750	6,570	6,110

Source: The Business Statistics Office of the CSO, 1995

### Quality of life data

**Table C.17 Noise nuisance complaints by type of nuisance made to London boroughs between April 1993 and March 1994**

borough	commercial entertainment	domestic	construction demolition	noise in the street	aircraft noise	rail traffic noise	misc.	total
Harrow	143	542	38	49	0	0	3	n/a
Camden	374	494	215	67	0	0	14	n/a
Bromley	n/a	589	120	289	49	12	25	1542

Source: LPAC, 1995

**Table C.18 Overcrowding in London boroughs**

borough	no. of residents over 1 person per room	% residents over 1 person per room	no. residents over 1.5 persons per room	% residents over 1.5 persons per room
Bromley	7718	2.7	1303	0.5
Camden	16846	10.4	6452	4.0
Harrow	12964	6.5	2816	1.4

Source: OPCS, 1993

## Appendix C: Land use trends and impacts data for Harrow, Camden and Bromley

**Table C.19 Percentage of population living within 400m of basic services**

borough	GPs surgery or health centre	food shop	PO/bank
Bromley	52.20	no response	22.00
Camden	no response	90.00	no response
Harrow	50.60	60.60	40.30

Source: LPAC, 1995

**Table C.20 Number of dwellings in town centres**

borough	town centre	number of dwellings
Bromley	Bromley	3224
	Beckenham	1156
	Orpington	1230
	Penge	1284
	West Wickham	1756
borough total		8650
Camden	Kilburn	2612
	Camden Town	1751
	Swiss Cottage/Finchley Rd	2075
	Tottenham Court Road	1338
borough total		6951
Harrow	Harrow	1832
	Burnt Oak	1347
	Edgware	610
	Kenton	437
	Kingsbury	186
	North Harrow	1237
	Pinner	1497
	Rayners lane	1225
	South Harrow	1636
	Stanmore	644
	Wealdstone	1053
borough total		10247

Source: LPAC, 1995

**Table C.21 London's housing capacity: large sites, including windfalls**

borough	1992-1996	1997-2001	2002-2006	1992-2006
Bromley	2642	1510	1385	5537
Camden	534	721	1793	3048
Harrow	925	640	475	2040

Source: LPAC, 1994b



## Appendix C: Land use trends and impacts data for Harrow, Camden and Bromley

**Table C.22 Housing provision 1992-2006**

borough	large sites	windfalls	small sites	conversions	total	rounded
Bromley	2537	3000	1200	1900	8637	8650
Harrow	1220	820	760	375	3175	3175
Camden	3048	0	653	6001	9702	9700

Source: LPAC, 1995

**Table C.23 Empty residential property, 1 April 1991**

borough	% dwellings vacant	total
Bromley	1.45	2,169
Camden	5.90	5,467
Harrow	2.70	2,217

Source: OPCS, 1993

**Table C.24 Availability of recreational and sporting facilities, 1992**

borough	public open space, 1991, (ha)	no. of golf courses	no of theatres	no. of libraries	no. of sports centres	no. of swimming pools	no. of athletics tracks
Camden	377	0	26	13	5	4	2
Bromley	1,077	2	4	16	8	6	2
Harrow	411	0	1	10	3	1	2

Source: OPCS, 1995

**Table C.25 Stock of dwellings 1994**

borough	total	private sector	housing association	local authority	other public sector	total vacant
Camden	85,351	48,993	6,177	29,520	661	3,929
Bromley	not available	103,338	18,206	80	not available	not available
Harrow	80,278	71,608	1,465	6,702	503	2,894

Source: OPCS, 1995

## Appendix C: Land use trends and impacts data for Harrow, Camden and Bromley

### Environmental data

**Table C.26 Area of green chains**

borough	length (meters)	area (hectares)
Bromley	8,000	areas to be supplied in later SoE update
Camden	5,000	areas to be supplied in later SoE update
Harrow	6,100	20

Source: LPAC, 1995

**Table C.27 Areas of protected open space (hectares)**

borough	green belt	metropolitan open land	other protected open space	total	total as a % of total area of the borough
Bromley	7890	683	549	9122	60.1
Camden	0	302	no response	302 (figures under-represent true total)	13.0 (figure under-represents true %)
Harrow	1028	278	no response	1306 (figures under-represent true total)	25.7 (figure under-represents true %)

Source: LPAC, 1995

**Table C.28 Areas of green belt and metropolitan open land accessible for public recreation**

	green belt			metropolitan open land		
	total area (ha.)	accessible area (ha.)	accessible as % of total	total area (ha.)	accessible area (ha.)	accessible as % of total
Bromley	7890	1104	14	683	428	63
Camden	0	N A	N A	302	302	100
Harrow	1028	656	64	278	254	91

Source: LPAC, 1995

## Appendix C: Land use trends and impacts data for Harrow, Camden and Bromley

**Table C.29 Areas covered by nature conservation designations**

borough	total area covered (ha.)	% of borough covered
Bromley	1715	11.3
Camden	566	26.0
Harrow	865	17.0

Source: LPAC, 1995

**Table C.30 Losses, gains and changes in quality of nature conservation sites (based on four categories)**

borough	total area of designated nature conservation sites	developed or reduced in quality			improved in quality		new sites
		category A (ha)	category B (ha)	A&B as a % of total	Category C (ha)	C as % of total	
Bromley	445	0.0	0.0	N A	7.0	1.6	6.0
Camden	478	0.0	0.0	N A	0.0	N A	0.0
Harrow	477	0.0	0.0	N A	87.0	18.2	0.0

A - the area of those parts of nature conservation sites whose quality has been destroyed by development or partial development in the year to 31 March 1994

B - the area of those parts of sites which remain intact, but whose quality has been seriously reduced

C - the area of sites substantially improved in quality

D - area of new sites created

Source: LPAC, 1995

**Table C.31 Public open space in London boroughs in 1971 and 1991**

borough	public open space 1971 (ha.)	public open space 1991 (ha.)	public open space (ha.) 1991 minus spaces less than 0.8 ha.	change 1971-1991	1991 total as a % of the 1971 total
Camden	350.0	376.7	361.9	11.9	103%
Bromley	884.0	1,076.6	1,074.4	190.4	122%
Harrow	386.0	411.2	407.9	21.9	106%

Source: Llewelyn-Davies, 1992

**Table C.32 Total area of boroughs that fit DoE definition of derelict land**

borough	1993 total (hectares)
Bromley	0.0
Camden	9.0
Harrow	0.1

Source: LPAC, 1995

## Appendix C: Land use trends and impacts data for Harrow, Camden and Bromley

**Table C.33 Density of persons living within 800m of major public transport interchanges, and number of interchanges**

borough	density (persons/hectare)	no. of interchanges
Bromley	43.57	3
Camden	no response	no response
Harrow	44.72	5

Source: LPAC, 1995

**Table C.34 Number of trees and density**

borough	all individual trees		stands of trees
	number	density (trees per hectares)	mean density (stands per hectare)
Bromley	360,349	23.74	0.65
Camden	76,549	35.26	0.34
Harrow	181,935	35.80	0.38

Source: LPAC, 1995

**Table C.35 Local authority community heating schemes in London, March 1995**

borough	no. of community heating schemes	no. of dwellings covered in schemes
Bromley	7	252
Camden	142	13,141
Harrow	5	115

Source: LPAC, 1995

**Table C.36 Combined heat and power, and district heating generation in London**  
(figures are given in millions of kilowatt hours)

borough	combined heat and power total	community heating total
Bromley	no response	no response
Camden	1.2	311.0
Harrow	no response	no response

Source: LPAC, 1995

## Appendix C: Land use trends and impacts data for Harrow, Camden and Bromley

**Table C.37 Bus priority schemes**

borough	no. of schemes
Bromley	23
Camden	28
Harrow	no response

Source: LPAC, 1995

**Table C.38 Completion of cycle routes (metres)**

borough	London cycle network	other cycle routes	total
Bromley	20,000	1,000	21,000
Camden	2,100	0	2,100
Harrow	0	650	650

Source: LPAC, 1995

**Table C.39 Home based shopping trips by borough and mode (no. of trips per day)**

borough	car	bus	BR	cycle	walk	L/U
Camden	25,000	17,000	10,000	neg.	75,000	35,000
Bromley	105,000	19,000	3,000	1,000	65,000	N A
Harrow	75,000	15,000	N A	2,000	50,000	4,000

Note: numbers are approximate as they are taken from a graphical representation of the data

Source: LPAC, 1995

**Table C.40 Journey to work trips with origin and /or destination in London by mode**

borough	car	bus	BR	cycle	walk	L/U
Camden	170,000	170,000	140,000	neg.	200,000	160,000
Bromley	200,000	N A	N A	neg.	50,000	N A
Harrow	160,000	15,000	N A	neg.	30,000	20,000

Note: numbers are approximate as they are taken from a graphical representation of the data

Source: LPAC, 1995

**Table C.41 Peak period (07.00 to 09.59 hours) passenger arrivals at underground stations in central London, 1981-1992**

Underground station	1981	1992
Covent Garden	3,641	429
Kings Cross	25,989	30,324

Source: LPAC, 1995

## Appendix C: Land use trends and impacts data for Harrow, Camden and Bromley

**Table C.42 Travel to work**

borough	total employees and self employed residents 10% sample	percentage of employees and self employed residents who						1981-1991 change in percentage travelling to work by	percentage of public transport users in households		
		rail	bus	car	pedal cycle	foot	work at home		public transport	car	with car
Camden	6,968	29.26	12.76	22.66	2.78	17.41	9.34	-3.67	1.15	41.46	65.75
Bromley	13,425	26.39	6.81	50.75	1.01	7.11	4.44	-3.45	6.43	42.21	72.63
Harrow	9,271	24.12	6.42	53.24	0.99	7.39	4.96	-2.23	4.52	38.65	69.33

Source: OPCS, 1993

**Table C.43 Net commuting by borough (000s)**

borough	Net commuting		1981-1991 change	1991	
	1981	1991		% working at home	% working outside borough of residence
Camden	123.12	126.78	3.7	9.5	50.8
Bromley	-48.06	-42.35	5.7	4.6	55.0
Harrow	-31.64	-28.07	3.6	5.0	59.8

Source: OPCS, 1995

**Appendix D**  
**Regional and London-wide intensification**  
**policy tables**

**Table D.1 Regional and London-wide intensification policies with economic objectives 1987-1997**

<b>Policies</b>	<b>Source</b>	<b>Objectives</b>	<b>Implementation</b>
<b>Regional Guidance for the South East</b>			
<b>South East Regional and Strategic Guidance</b>			
locate a large part of the future development where development already exists (1989, B6)	Regional Guidance for the South East: PPG9, DoE, 1989 letter from the SSE, 1980, contained in PPG9, 1989	to create favourable conditions in London so that private individuals and firms will once more chose to live and invest there (1989, B5)	by London boroughs revising their development plans and in day-to-day development control decisions (1989, B.11)
encourage the better use of existing urban land, redevelopment and the return to use of neglected sites, rather than the allocation of new land for development (1989, C6)	letter from the SSE, 1984, contained in PPG9, 1989	to make full use of the region's existing assets (1989, C6)	through usual planning procedures
revive older urban areas within the region (1989, A8)	letter from the SSE, 1986 contained in PPG9, 1989	to promote economic growth (1989, A10)	through development control policies and the provision of infrastructure and services, by reviewing land holdings and making available for sale any sites that are not needed for early development for their own statutory functions - the SSE will also encourage the release of sites on the Land Registers for development or re-development (1989, A12)
<b>The economy</b>			
maintain the activity of the urban areas (1990, 2.21)	A New Strategy for the South East, SERPLAN, 1990	to prevent an exodus of activity and investment to the greenfields and to create a competitive environment in European terms (1990, 2.21)	through usual planning procedures
<b>Principles</b>			
the fullest possible use should be made of opportunities for redevelopment and recycling urban land (1994, 1.10)	RPG9: Regional Planning Guidance for the South East, DoE and South East Regional Office, 1994	to secure economic development and regeneration (1994, 1.10) and to increase economic opportunities (1994, 4.8)	through usual planning procedures



planning and transport policies should be coordinated (1994, 1.10)		to moderate the increase in traffic congestion which imposes costs on businesses and on society as a whole (1994, 3.3)	by London boroughs including this advice in development plans (1994, 1.11)
<b>Town centres and retail development</b>	<b>RPG9: Regional Planning Guidance for the South East, DoE and South East Regional Office, 1994</b>		
wherever possible retail development should be located within existing town and district centres (1994, 4.13)		to contribute to the economic strength of existing towns (1994, 4.13)	through usual planning procedures
<b>Guidance for London</b>			
<b>Business and industry</b>	<b>RPG3: Regional Planning Guidance: Strategic Guidance for London, DoE, 1989</b>		
London boroughs should make the most of large sites which were formally required for public utilities or services but which are no longer needed for those purposes (1989, 19)		to foster economic growth (1989, 18)	by identifying such sites in UDPs (1989, 21)
<b>Green belt</b>	<b>RPG3: Regional Planning Guidance: Strategic Guidance for London, DoE, 1989</b>		
maintain the permanence of the green belt as far as can be seen ahead (1989, 58)		to assist urban regeneration (1989, 57)	UDPs should show approved boundaries precisely (1989, 58)
<b>Retailing</b>	<b>RPG3: Regional Planning Guidance: Strategic Guidance for London, DoE, 1989</b>		
existing town centres should continue to be the main focus for the provision of shopping facilities (1989, 72)		to assist regeneration and job creation (1989, 72)	through usual planning procedures
<b>London's economy</b>	<b>Strategic Guidance for London Planning Authorities: RPG3, GOL, 1996</b>		
promote policies in local plans to ensure that jobs and homes are accessible to each other (1996, 3.6)		to enhance local employment opportunities (1996, 3.6)	by boroughs including such policies in their UDPs and identifying sites suitable for development (1997, 3.6)

<p><b>Housing</b></p>	<p><b>Strategic Guidance for London Planning</b>  <b>Authorities: RPG3, GO1, 1996</b></p>	<p>permit more house conversions (1996, 4.16)</p> <p>to support local economic activity especially the viability of services to the local population (1996, 4.16)</p> <p>by adopting a more sensitive approach to standards (1996, 4.16)</p>
<p><b>Town centres and retailing</b></p>	<p><b>Strategic Guidance for London Planning</b>  <b>Authorities: RPG3, GOL, 1996</b></p>	<p>boroughs should heed the advice in PPG6 and adopt sequential testing for retail development (1996, 5.2)</p> <p>to steer development to the hierarchy of centres as devised by LPAC and GOL as strategic centres, so as to contribute to their vitality and viability (1996, 5.4)</p> <p>by including details of the hierarchy in UDPs and using these in development control decisions (1996, 5.4)</p>
<p><b>Transport</b></p>	<p><b>Strategic Guidance for London Planning</b>  <b>Authorities: RPG3, GOL, 1996</b></p>	<p>LAs should develop complimentary land use and transport policies (1996, 6.4)</p> <p>to maintain and enhance the viability and vitality of town centres (1996, 6.4)</p> <p>LAs should work in partnership with both public transport operators and private developers in linking development sites with improved public transport infrastructure and interchange points (1996, 6.9)</p>

**Table D.2 Regional and London-wide intensification policies with quality of life objectives 1987-1997**

Policies	Source	Objectives	Implementation
<b>Regional Guidance for the South East</b>			
<b>South East Regional and Strategic Guidance</b>			
re-use and fully use urban sites and recycle urban land for housing (1989, A14)	Regional Guidance for the South East: PPG9, DoE, 1989	letter from the SSE, 1986 contained in PPG9, 1989	to meet the demand for new housing (especially for smaller households); also to maximise the use of existing infrastructure and provide homes for people who prefer urban locations (1989, A14)
<b>Housing</b>			
make better use of urban land and capital assets, such as existing infrastructure and housing stock (1990, 2.37)	A New Strategy for the South East, SERPLAN, 1990	to provide suitable and accessible housing for all the region's population, and to re-utilise older urban areas (1990, 2.37)	The DoE should reiterate these objectives and policies in regional guidance (1990, C1) LPAC and the London boroughs should optimise the use of urban land for housing and make the best use of the existing housing stock (1990, K15)
allow the continued conversion of the housing stock (1990, 2.4)		to meet the needs of the growing numbers of smaller households (1990, 2.40)	through usual planning procedures
<b>Transport</b>			
development should be so planned as to reduce the necessity for travel (1990, 2.63)	A New Strategy for the South East, SERPLAN, 1990	to reduce costs and casualties (1990, 2.63)	by locating high density developments at focal points on the public transport system (1990, 2.67) The DoT should foster a closer relationship between land use and transport planning and support the planning of development so as to reduce the necessity for travel (1990, D4). LPAC and London boroughs should plan development so as to reduce the needs to travel (1990, K19).

<p><b>Retailing</b></p>	<p><b>A New Strategy for the South East, SFRPI AN, 1990</b></p>	<p>retailing should be steered to those areas where it can be of maximum benefit to the local communities and least damaging to the environment (1990, 2.77)</p>	<p>to make retail facilities accessible to local communities (1990, 2.77)</p>	<p>through usual planning procedures</p>
<p><b>Principles</b></p>	<p><b>RPG9: Regional Planning Guidance for the South East, DoE and South East Regional Office, 1994</b></p>	<p>planning and transport policies should be co-ordinated (1994, 1.10)</p>	<p>to make workplaces more accessible to the untapped labour force of London (1994, 3.9)</p>	<p>By London boroughs including this advice in development plans (1994, 1.11)</p>
<p><b>Town centres and retailing</b></p>	<p><b>RPG9: Regional Planning Guidance for the South East, DoE and South East Regional Office, 1994</b></p>	<p>whenever possible retail development should be located within existing town and district centres (1994, 4.13)</p>	<p>to enable the trip to serve several purposes; to ensure that shopping is more accessible to those without cars... (1994, 4.13)</p>	<p>through usual planning procedures</p>
<p><b>Guidance for London</b></p>	<p><b>Greater London Development Plan, GLC, 1976</b></p>	<p>developments at the appropriate densities in outer London should generally produce more dwellings than there are at present, especially where the sites of large obsolete houses are redeveloped (1976, 3.22)</p>	<p>to help house all Londoners, especially those displaced by redevelopment from housing problem areas (1976, 3.21)</p>	<p>through usual planning procedures</p>
<p>land now lying idle or under-used but suitable for residential use should proceed quickly (1976, 3.22)</p>		<p>higher densities than would otherwise be permitted may be suitable for non-family housing in Central London, at strategic centres, and at other locations within easy walking access to public transport, to open space, or to other local facilities (1976, 3.24)</p>	<p>to help provide locations for London's housing needs (1976, 3.22)</p>	<p>through all planning, housing and fiscal policies of both central and local government (1976, 3.22)</p>
			<p>to meet the housing needs of non-family households (1976, 3.22-3.24)</p>	<p>through detailed policies in plans and detailed density policies, also the LPA will be in a position to exercise its appropriate powers, whether building itself or assisting other agencies, by financial assistance, compulsory purchase or the sale or lease of land, or by its scrutiny of local plans and its rights to comment upon them (1976, 331)</p>

<b>Greater London Development Plan, GLC, 1976</b>	
<b>Employment</b>	
offices should be located in the strategic centres (1989, 4.8)	to make best use of public transport and other facilities (1976, 4.8)
	by taking positive action to encourage development in these locations e.g. by infrastructure and transport provision to sites, the acquisition of obsolete premises (for re-development) making sure local plans conform to this objective and granting or withholding permissions (1976, 4.30)
<b>Regional Planning Guidance 3: Strategic Guidance for London, DoE, 1989</b>	
<b>Housing</b>	
promote the conversion and sub-division of the existing housing stock (1989, 49)	to meet the needs for smaller housing units (1989, 49)
UDPs should make provision for an estimated total of 260,000 additional units between 1987 and 2001 (1989, 50)	to meet London's housing needs (1989, 50)
make sure that there is a continuing supply of land for new housing and that policies enable redevelopment at higher densities where appropriate (1989, 56)	by identifying sites in the UDPs and calculating additions from conversions etc. (1989, 50)
<b>Retailing</b>	
existing town centres should continue to be the main focus for the provision of shopping facilities (1989, 72)	to meet London's housing needs (1989, 50)
	through usual planning procedures
<b>Regional Planning Guidance 3: Strategic Guidance for London, DoE, 1989</b>	
<b>Housing</b>	
provide 260,000 additional dwellings for the period 1987-2001 (1996, 1.14)	to improve accessibility to those without cars (1989, 72)
	through usual planning procedures
<b>Strategic Guidance for London Planning Authorities: RPG3, GOL, 1996</b>	
<b>Housing</b>	
provide 260,000 additional dwellings for the period 1987-2001 (1996, 1.14)	to maximise housing provision in London consistent with maintaining environmental quality to meet the changing needs of the population (1996, 1.14)
	by adopting a more sensitive approach to standards, particularly avoiding inappropriate restrictions on the amount of development, e.g. by the imposition of generous off-street parking standards or inappropriate amenity standards or densities which do not have regard to the context of the development (1996, 4.16)

permit more house conversions (1996, 4.16)

to bring life and stability into areas in which the population has declined in the past (1996, 4.16), to support local economic activity especially the viability of services to the local population (1996, 4.16), thereby contributing to sustainable development (1996, 4.16)

by adopting a more sensitive approach to standards (1996, 4.16)

**Table D.3 Regional and London-wide intensification policies with environmental objectives 1987-1997**

<b>Policies</b>	<b>Source</b>	<b>Objectives</b>	<b>Implementation</b>
<b>Regional Guidance for the South East</b>			
<b>South East Regional and Strategic Guidance</b>	<b>PPG9: Regional Guidance for the South East, DoE, 1989</b>		
locate a large part of the future development where development already exists (1989, B6)	letter from the SSE, 1980, contained in PPG9, 1989	to deter the scattered and haphazard development harmful to the conservation of the countryside (1989, B11)	by London boroughs revising their development plans and in day-to-day development control decisions (1989, B11)
ensure that the fullest possible use is made of existing infrastructure, buildings and unused land (1989, A10)	letter from the SSE, 1986, contained in PPG9, 1989	to accommodate economic growth and development in ways that conserve resources and protect the environment (1989, A10)	through usual planning procedures
revive older urban areas within the region (1989, A8)	letter from the SSE, 1986, contained in PPG9, 1989	to protect the environment (1989, A10)	through development control policies and the provision of infrastructure and services, by reviewing land holdings and making available for sale any sites that are not needed for early development for their own statutory functions - the SSE will also encourage the release of sites on the Land Registers for development or re-development (1989, A12)
re-use and fully use urban sites and recycle urban land for housing (1986, A14)	letter from the SSE, 1986, contained in PPG9, 1989	to assist in the preservation of good agricultural land and conservation of the countryside (1989, A14)	through usual planning procedures

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**The built environment**

**A New Strategy for the South East,  
SFRPLAN, 1990**

make the best use of land previously developed (1990, 2.11)

to recycle land and maintain compactness in the face of so many latent dispersal pressures (1990, 2.11)

LPAC and London boroughs should prepare strategies to make better use of spare resource capacity i.e. brownfield land (1990, K10)

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**Transport**

**A New Strategy for the South East,  
SERPLAN, 1990**

development should be so planned as to reduce the necessity for travel (2.63, 1990)

to reduce adverse environmental effects (1990, 2.63)

by locating high density developments at focal points on the public transport system (1990, 2.67) and by the DoE increasing the emphasis on the use of transport investment to secure environmental improvements (1990, C.13); the DoT should foster a closer relationship between land use and transport planning and support the planning of development so as to reduce the necessity for travel (1990, D4); LPAC and London boroughs should plan development so as to reduce the need to travel (1990, K19).

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**Retailing**

**A New Strategy for the South East,  
SERPLAN, 1990**

retailing should be steered to those areas where it can be ... least damaging to the environment (1990, 2.77)

to protect valued local environments (1990, 2.77)

no major developments should be allowed in green belts or on MOL (1990, 2.77)



**Principles**

**Regional Planning Guidance for the South East; RPG9, DoE and South East Regional Office, 1994**

the fullest possible use should be made of opportunities for redevelopment and recycling urban land (1994, 1.10)

through usual planning procedures

to improve the urban environment and reduce the need to take greenfield sites for development (1994, 1.10); to meet the needs of sustainable development (4.11, 1994) and to contribute to environmental improvements (1994, 4.8)

planning and transport policies should be coordinated (1994, 1.10)

to provide a better relationship between homes, workplace and other activities so as to reduce the need to travel; to encourage the use of energy efficient modes of transport; and to facilitate environmental improvements (1994, 1.10)

by London boroughs including this advice in development plans (1994, 1.11)

**Environment and land use**

**Regional Planning Guidance for the South East; RPG9, DoE and South East Regional Office, 1994**

encourage development patterns which help us to use energy efficiently (1994, 4.1)

to meet the announced targets for reduced emissions of gases causing global warming, ozone depletion and acid rain (1994, 4.41)

by LPAs drawing up such policies in their development plans (1994, 4.41)

**Green belt**

**Regional Planning Guidance for the South East; RPG9, DoE and South East Regional Office, 1994**

retain the green belt (1994, 4.18)

to contain urban sprawl (1994, 4.18)

through usual planning procedures

<p><b>Housing: overall regional provision</b></p>	<p><b>Regional Planning Guidance for the South East; RPG9, DoE and South East Regional Office, 1994</b></p>
<p>The region will continue to provide 57,000 additional dwellings per annum over the 20 years from 1991-2011. These should be located so as to establish a sustainable relationship between homes, workplaces and other facilities, and to minimise unnecessary travel (1994, 5.10)</p>	<p>to meet housing demands in the most sustainable way (1994, 5.10) by including targets in development plans (1994, 5.10)</p>
<p><b>Transport</b></p>	<p><b>Regional Planning Guidance for the South East; RPG9, DoE and South East Regional Office, 1994</b></p>
<p>policies for development should be coordinated with policies and programmes for transport infrastructure and for management of the transport system in order to reduce the need to travel (1994, 6.7)</p>	<p>to improve the environment (1994, 6.7); to reduce the reliance of the motor vehicle (1994, 6.5); and to increase the opportunity to choose modes of transport with less environmental impact, particularly walking, cycling, public transport and rail and water for freight (1994, 6.5) through usual planning procedures</p>
<p><b>Guidance for London</b></p>	<p><b>Greater London Development Plan, GLC, 1976</b></p>
<p>new developments involving the movements of substantial numbers of people should be sited near public transport services (1976, 5.4.24)</p>	<p>to encourage people to use public transport and not their cars (1976, 5.2.1-5.2.6) through investment in public transport and through planning policies (1976, 5.2.1-5.2.6)</p>
<p><b>Open Land: recreation: minerals</b></p>	<p><b>Greater London Development Plan, GLC, 1976</b></p>
<p>the green belt around London should be retained (1976, 9.10)</p>	<p>to limit urban sprawl and protect the countryside (1976, 9.10) by showing the boundaries clearly in development plans and ensuring they are adhered to (1976, 9.10)</p>

<b>Business and industry</b>	<b>RPG3: Regional Planning Guidance: Strategic Guidance for London, DoE, 1989</b>	to foster economic growth while taking careful account of the impact on the environment (1989, 18)	by identifying such sites in UDPs (1989, 21)
London boroughs should make the most of large sites which were formally required for public utilities or services but which are no longer needed for those purposes (1989, 19)			
<b>Housing</b>	<b>RPG3: Regional Planning Guidance: Strategic Guidance for London, DoE, 1989</b>	to assist the preservation of green belt and MOL and make the most of the existing infrastructure (1989, 49)	through usual planning procedures
promote the conversion and sub-division of the existing housing stock (1989, 49)			
<b>Green belt</b>	<b>RPG3: Regional Planning Guidance: Strategic Guidance for London, DoE, 1989</b>	to check the unrestricted sprawl of built-up areas; to safeguard the surrounding countryside from encroachment; to prevent London merging with neighbouring towns; to assist urban regeneration (1989, 57)	UDPs should show approved boundaries precisely (1989, 58)
maintain the permanence of the green belt as far as can be seen ahead (1989, 58)			
<b>Strategic framework</b>	<b>RPG3: Strategic Guidance for London Planning Authorities, GOL, 1996</b>	to encourage a pattern of land use and provision of transport which minimises harm to the environment and reduces the need to travel especially by car, consistent with the principles of sustainable development (1996, 1.14)	through usual planning procedures
make the most of urban land (1996, 1.14)			
<b>London's economy</b>	<b>RPG3: Strategic Guidance for London Planning Authorities, GOL, 1996</b>	to reduce the need to travel and encourage the development in areas served by energy efficient patterns of transport (1996, 3.6)	by boroughs including such policies in the UDPs and identifying sites suitable for development (1996, 3.6)
promote policies in local plans to ensure that jobs and homes are accessible to each other (1996, 3.6)			
<b>Housing</b>	<b>RPG3: Strategic Guidance for London Planning Authorities, GOL, 1996</b>		

permit more house conversions (1996, 4.16)		to assist in reducing the need to travel, thereby contributing to sustainable development (1996, 4.16)	by adopting a more sensitive approach to standards (1996, 4.16)
<b>Town centres and retailing</b>	<b>RPG3: Strategic Guidance for London Planning Authorities, GOI, 1996</b>		
boroughs should heed the advice in PPG6 and adopt sequential testing for retail development (1996, 5.2)		to steer development to the hierarchy of centres as devised by LPAC and GOL, so as to contribute to the aims of sustainable development (1996, 5.4)	by including details of the hierarchy in UDPs and using these in development control decisions (1996, 5.4)
<b>Transport and development</b>	<b>RPG3: Strategic Guidance for London Planning Authorities, GOL, 1996</b>		
use the planning system to encourage land uses which will reduce the need to travel... (1996, 6.2)		to meet the goals of sustainable development (1996, 6.2)	through a balanced programme of transport investment, complemented by appropriate policies to be pursued by central government, LAs, public transport operators and other bodies (1996, 6.3)
<b>Transport</b>	<b>RPG3: Strategic Guidance for London Planning Authorities, GOL, 1996</b>		
LAs should identify locations and allocate sites for development which would be consistent with generating less travel, promoting the use of public transport and other non-car modes, creating greater opportunities for forms of transport other than the car and reducing the journey length (1997, 6.4)		to meet the goals of sustainable development (1996, 6.2)	LAs should work in partnership with both public transport operators and private developers in linking development sites with improved public transport infrastructure and interchange points (1996, 6.9)
<b>The open environment</b>	<b>RPG3: Strategic Guidance for London Planning Authorities, GOL, 1996</b>		
the green belt should be maintained (1996, 7.3)		to assist in safeguarding the countryside from development (1996, 7.3)	LAs should set out in strategic policies for the future of the green belt (1996, 7.10)
<b>The built and historic environment</b>	<b>RPG3: Strategic Guidance for London Planning Authorities, GOL, 1996</b>		
boroughs should reassess the density assumptions they are using with a view to encouraging higher densities where appropriate (1996, 8.11)		to make the fullest use of urban land and avoid urban sprawl and unsustainable patterns of living (1996, 8.10)	review UDP policies (1996, 8.11) and pay more attention to better design (1996, 8.13) and by boroughs preparing development briefs (1996, 8.13)

**Appendix E**  
**Intensification policy tables for Camden,**  
**Harrow and Bromley**

**Table E.1 Harrow - urban intensification policies with economic objectives 1987-1997**

Policy Employment	Objective	Means of implementation
The council will encourage office development to locate in the district and local centres ... (1986, p.57)	to maintain and improve the ability of these centres to provide integrated shopping, transport and employment facilities; and to ensure that office workers have access to shops and transport services (1986, p.57)	through statutory planning procedures
The council will encourage existing industrial and warehousing firms to remain in the borough by giving sympathetic consideration to planning applications to modify and extend their premises on existing and/or adjacent sites (1986, p.57)	to improve employment opportunities appropriate to the skills of the resident workforce (1986, p.57)	through statutory planning procedures
The council will normally resist the change of use of land and buildings from industry/warehousing, particularly in the industrial areas ... (1986, p.58)	to improve employment opportunities appropriate to the skills of the resident workforce (1986, p.57)	through statutory planning procedures
The council will encourage the quick redevelopment of any vacant industrial and warehousing sites for either of these land uses (1986, p.8)	to improve employment opportunities appropriate to the skills of the resident workforce (1986, p.57)	through statutory planning procedures
The council has identified three named sites for industrial warehousing development (1986, p.58)	to improve employment opportunities appropriate to the skills of the resident workforce (1986, p.57)	through statutory planning procedures
The council will only accept the principle of industrial/warehousing development on other sites outside existing industrial areas if: a. the impact on adjoining properties is small; and b. the traffic generated can be accommodated on surrounding roads (1986, p.58)	to improve employment opportunities appropriate to the skills of the resident workforce (1986, p.57)	through statutory planning procedures
The council will consider favourably proposals for employment generating uses in suitable locations (1994, EM2)	to maximise the opportunities available to Harrow's resident workforce, and to foster the borough's economic health (1994, 4.24)	through statutory planning procedures

## Shopping

The council has defined 9 district centres and 5 local centres where it will encourage and protect the uses: shopping, offices, small scale industrial and warehousing, indoor recreation and leisure, community uses e.g. clinic, public conveniences (1986, p.66)

to maintain the existing distribution of district and local centres, and their diversity of functions (1986, p.66)

through statutory planning procedures

Additional shopping provision will normally be directed towards existing shopping centres (1994, S2)

to safeguard and maintain their vitality and viability (1994, 25.22)

by resisting any development which prejudices the strategic role of Harrow town centre (1994, S1, 5.19)

All proposals for new shopping development will be assessed on the basis of the following criteria: a. no adverse impact on the existing pattern of shopping facilities in the borough; b. no substantial loss of land from another use which other policies in the plan seek to protect; c. acceptable traffic generation and public and private transport accessibility.

In cases where retail development is permitted outside the main shopping part of district or local centres, consideration will be given to imposing a condition to limit the type of goods sold. In the main shopping part of district and local centres, the redevelopment of existing premises for retail purposes will be permitted. In cases where the demolition of shops is proposed the council will not permit a significant reduction in the total shopping floorspace and frontage on redevelopment (1986, p.69)

to maintain the existing distribution of district and local centres, and their diversity of functions (1986, p.66)

Any proposal or new shopping development which would have a detrimental impact on existing shopping centres will be restricted. The council may require an impact study to be submitted with a particularly large scheme (1986, p.68)

The council will promote Harrow town centre as the borough's strategic centre and the focus of major new retail development and will seek to improve its accessibility and attractiveness. Proposals which are likely to prejudice this strategic role will be resisted (1994, S1)

to maintain the vitality and viability of the town centre (1994, 5.29)

by resisting any development which prejudices the strategic role of Harrow town centre (1994, S1, 5.19)

The council will normally direct new retail development to appropriate locations within established centres. Where appropriate, large food stores or retail warehouses may be acceptable outside designated centres if a suitable town centre site is unavailable and the development will improve provision of local shopping facilities. Any proposal for new shopping will be assessed on the basis of the following criteria: a. it does not seriously affect the vitality and viability of existing shopping centres or prejudice proposals for their improvement or expansion; b. there is no substantial loss of land from another use which other policies in the plans seek to protect; c. traffic generated by the development can be catered for satisfactorily on the local road network; d. access to and provision of public transport is adequate, particularly for people with disabilities; e. where appropriate the council will require environmental benefits in terms of public car parking, lighting and servicing facilities (1994, 5.29).

to maintain the vitality and viability of the town centre (1994, 5.29) through statutory planning procedures

In large scale schemes applicants for planning permission will normally be required to submit an assessment of the impact of the proposal on the existing pattern of retail provision (1994, S6)

to show the impact of the proposal, so that the LA can make decisions accordingly (1994, S6) through statutory planning procedures

In schemes involving the redevelopment of retail shop premises, the council will normally oppose any reduction in the total retail floorspace and/or frontage (1994, S8).

to maintain the existing provision and thus the viability and vitality of the area (1994, 5.44) through statutory planning procedures



**Table E.2 Harrow - urban intensification policies with quality of life objectives 1987-1997**

Policy	Objective	Means of implementation
<p><b>Housing</b></p> <p>Proposals to extend or adapt existing dwellings will be favourably considered, subject to their compliance with the detailed design standards (1986, p.44; 1994, H11)</p>	<p>to provide dwellings of an appropriate size and type in suitable locations for the residents of Harrow (1986, p.44; 1994, 3.56)</p>	<p>by funding a programme of maintenance and improvements of its own estates and assist owner occupants, landlords and tenants with financial aid under the house renovation grant scheme (1986, p.44)</p>
<p>The council will normally permit residential conversions (providing certain conditions) (1994, 9H10)</p>	<p>to provide housing at the lower end of the market and to help relieve pressures for new building (1994, 3.45, 3.36, 3.57)</p>	<p>by applying standards through development control (1994, 3.48-3.55)</p>
<p>The council will encourage the self-containment of property established in multiple-occupation (1994, H12). Where this is not possible and a special case can be shown on grounds of social need, shared facilities must be provided in accordance with public health standards, (1986, p.44)</p>	<p>to provide an essential housing service, e.g. to single people without access to other types of housing (1986, p.45)</p>	<p>through development control and grants where possible (1986, p.45), through development control</p>
<p>Proposed changes of use of land and/or buildings from residential to non-residential will be refused (unless certain circumstances apply) (1986, p.45; 1994, H18)</p>	<p>to restrict the loss of residential accommodation (1986, p.45; 1994, 3.69)</p>	<p>through development control - also the council has a policy of renting privately owned empty property, e.g. above shops, and then sub-letting to council tenants (1986 p.45; 1994, 3.71)</p>
<p>The council will plan to achieve target figures of 6000 newly built dwellings and 750 net gains of converted units during the 15 year plan period. The council has identified specific sites ... where housing development is proposed. Council action to achieve development will be initiated where land suitable for residential development remains vacant or a planning permission for residential development is unimplemented for a long period. New residential developments will be permitted on all physically suitable sites except those safeguarded by other policies in the plan. In schemes involving the redevelopment of residential accommodation, the council will normally seek a net gain of residential units, and will require replacement of the same number as a minimum (1986, p.46).</p>	<p>to provide sufficient land for new housing development (1986, p.46)</p>	<p>liaison with land owners, developers and the house builders federation together with the exceptional use of compulsory purchase powers, will provide the means for encouraging development on particular sites ... (1986, p.46) council will continue to identify sites/land with housing development potential and to give advice to developments and housing associations on the availability of sites (1986, p.46)</p>

The council will seek the provision of 4500 additional dwellings in the borough through new build, conversions and changes of use in the period 1st January 1987 to 31st December 2001 and will monitor provision to ensure that sufficient permissions are granted which can facilitate such provision (1994, H2).

New housing development on sites exceeding 0.75 acre (0.3 hectare) will be permitted at a density in the range of 70-100 habitable rooms per acre (170-247 habitable rooms per hectare), provided that a high standard of design and layout is achieved (Policy 23) and subject to the following exceptions:

1. densities under 70 habitable rooms per acre (170 habitable rooms per hectare) will only be approved on sites where, to preserve amenity, it is necessary to retain individual trees or groups of trees ...
2. densities of 100 habitable rooms per acre (247 habitable rooms per hectare) for non-family dwellings (for 1 or 2 person households without children) will be approved on sites in and around district and local centres or otherwise well-served by good public transport facilities
3. the development harmonises with surrounding areas.
  - b. where the site concerned is less than 0.75 acre, although density will be taken into account, other criteria will be considered more important, including the shape and nature of the site, on-site car parking and amenity space, access *arrangements and daylight standards*
  - c. because of the diverse character and building forms existing in the boroughs conservation areas any density standards will be considered secondary to detailed design considerations (1986, p.50).

The council will initiate action to achieve development where land or buildings suitable for residential development remains vacant or a planning permission for residential development is unimplemented for a long period (1994, H6)

to provide dwellings of an appropriate size and type in suitable locations (1994, 3.24)

by keeping up to date records of land availability, and liaising with the Housebuilders Federation (1994, 3.30)

to achieve good standards in new housing development (1986, p.50)

applying standards through development control (1986, p.5)

to provide dwellings of an appropriate size and type in suitable locations (1994, 3.24)

In exceptional circumstances the council may resort to the use of compulsory purchase powers in order to encourage development (1994, 3.36).

Within strategic, district and local centres, redevelopment schemes involving the demolition of existing residential accommodation should provide suitable replacement residential units (1994, H7)

to retain residential accommodation in town centres to maintain the liveliness of such areas after business premises have closed. Of equal importance is the need for the retention of small units which provide suitable accommodation for those who wish to live close to shops and services, and such small units should continue to be provided in town centres. Residential accommodation over shops can also provide a further benefit by enabling better surveillance of town centre areas, helping to reduce the threat of vandalism and crime (1994, 3.37)

through statutory planning procedures

In addition to detailed consideration being given to the quality of proposed residential development and its effects on the environment, the council will have regard to the prevailing densities in the residential district (1994, H8)

to protect the character of existing residential areas (1994, 3.4)

through statutory planning procedures

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#### **Recreation and leisure**

Entertainment facilities will be encouraged to remain, and will be permitted, in district and local centres (1986, p.104)

through statutory planning procedures

The provision of sports, arts, cultural, entertainment and other recreational facilities will be encouraged subject to the location being: a. accessible to all; b. acceptable in terms of impact on the local road network; and c. environmentally acceptable with regard to external appearance, siting and the amenity and the nature conservation value of the area. Formal leisure facilities should be located where possible in built up areas (1994, R2).

to maintain and seek to improve the distribution, quality, use and accessibility of public and private open spaces in the borough (1994, 7.38); built up areas are favoured because they are more accessible to potential users and are likely to be better served by public transport (1994, 7.43)

through statutory planning procedures

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#### **Implementation, resources and monitoring**

The council will keep under review vacant and under-used land and buildings in the borough, to ensure that they are put to an appropriate use as quickly as possible. In particular the council will release, for development, land and buildings surplus to its own requirements, and will assist and encourage other land owners to do likewise (1986, p.137; 1994, IMP4)

to make the best use of existing land, especially to enable land to be used for socially useful developments not proposed by private developers (1986, p.137); to ensure there is land for statutory needs and housing (1994, 10.20)

through statutory planning procedures

**Table E.3 Harrow - urban intensification policies with environmental objectives 1987-1997**

Policy	Objective	Means of implementation
<p><b>Environment</b></p> <p>Land in the green belt will be kept primarily open in character and free from development (1986, p.25; 1994, E1, E9)</p>	<p>to limit urban development, preserve valuable agricultural land and provide a location for open air recreational facilities to serve the urban population (1986, p.25); to protect such areas from encroachment by development which would adversely change their character (2.21, 1994)</p>	<p>by resisting development in the green belt to only a few designated uses (e.g. outdoor recreation) (1986, p.26; 1994, 2.22, E10, E11, E14, E15, E16)</p>
<p>The council will require a high standard of design and layout in new development, and will consider the following factors in determining planning applications: a. the design and appearance of the development in relation to adjoining buildings including such factors as overlooking and scale ... c. car parking provision to the council's standards; d. adequate standards of daylight and sunlight; e. the layout of buildings including the appropriate provision of public and private open space and children's play areas; f. the provision of adequate private garden space, which for the rear garden of family housing should not be less than 10m in depth; ... m. the ability of surrounding roads to accommodate the traffic generated (1986, p.32-33).</p>	<p>to ensure a high standard of design and landscaping in new development and seeking to improve the environment in the borough (1986, p.32)</p>	<p>through the use of the policy in development control, and the production of more detailed planning guidance at a later date, by the council (1986, p.33)</p>
<p>The council will pursue the improvement of privately owned sites in the borough which are detrimental to the amenities of the area, taking action under Section 65 of the Town and Country Planning Act 1971 if necessary (1986 p.35)</p>	<p>to improve the appearance of any sites which are vacant and detrimental to the amenities of an area (1986, p.35)</p>	<p>by involving local residents' and amenity groups in clearance and landscape works - in other cases, where new building is appropriate, the council will seek speedy development taking into account the most appropriate use for a particular site. (1986, p.351)</p>
<p>The council will, where appropriate, pursue the improvement of sites in the borough which are detrimental to the amenities of the area, taking action under Section 215 of the Town and country Planning Act, 1990, if necessary (1994, E31)</p>	<p>to improve the appearance of any sites which are vacant and detrimental to the amenities of an area (1994, 2.92)</p>	<p>by involving local residents' and amenity groups in clearance and landscape works - in other cases, where new building is appropriate, the council will seek speedy development taking into account the most appropriate use for a particular site. (1994, 2.92)</p>

Developers shall provide a high quality of design and layout in new residential development and extensions. In considering proposals the council will take into account the character of the borough, the surrounding residential district and locality in which the development site is located, and the development site itself, together with the design and layout of the proposed development, and will require that the proposal, a. respects the scale, massing, siting, size, height, character, spacing, form, intensity and use of buildings in the district and locality;

b. provides space around buildings which reflects the setting and character of the neighbouring buildings and the district and locality, protects the privacy and amenities of the occupiers of adjoining properties and the occupiers of proposed buildings, and results in usable amenity space for the proposed occupiers which is suitable in the form, siting and amount of its provision; c. secures the optimum retention of trees and shrubs; ... d. Provides acceptable levels of car parking for residents and visitors, suitable access and parking arrangements, and appropriate traffic calming measures, located in a manner which protects the amenities of adjoining occupiers as well as the character of the district and locality without causing any adverse effect on the highway safety and movement; e. provides adequate refuse storage and f. does not encourage crime (1994, E45)

to endeavour to ensure that all development, whether new build, extensions, changes of use or conversion, appropriately maintains and enhances the established character of its locality and of the borough and is of a high standard of design, layout and landscaping (1994, 2.2)

through development control - the council may also consider imposing appropriate conditions restricting permitted development rights (1994, 2.12)

#### Employment

The council will consider favourably proposals for employment generating uses in suitable locations (1994, EM2)

to encourage fewer journeys to work by car through the development and retention of places of employment in established locations to which employees can easily travel by public transport, cycle or on foot (1994, EM1)

through statutory planning procedures

In principle, new office development (B1 use class) will be allowed in the strategic centre and in the district and local centres, except where a loss would occur of land or floorspace from another use which other policies seek to protect (1994, 4.27)

to encourage new employment opportunities subject to the protection of the environment and where such development is easily accessible from a wide range of places, particularly by public transport. The location of further employment opportunities within existing centres helps to maintain and improve the ability of these centres to provide integrated shopping, transport and employment facilities (1994, 4.27)

through statutory planning procedures

**Table E.4 Camden - urban intensification policies with economic objectives 1987-1997**

Policy	Objective	Means of implementation
<b>Employment and economic activity</b>	The LA will: 1. use its powers and resources to bring vacant land and property into use for employment purposes consistent with other objectives and policies in the plan (1987, EM3)	through statutory planning procedures
The council will continuously monitor the implementation of its employment policies and will continue to collect, analyse and publish employment information and press for such information to be made readily available from official sources. Information on vacant sites and premises suitable for employment uses will be made available to firms seeking accommodation in the borough (1987, EM8)	to advance employment policies (1987, p.34)	through statutory planning procedures
i ... permit and encourage a wide range of service sector employment at locations in the borough consistent with other objectives and policies in the plan ... (1987, EM10)	i. to maintain and encourage a wide range of economic activity in the borough within the overall framework of the policies contained in the plan; ii. to determine and influence the use of land and buildings for employment purposes having regard to: a. their location in respect to potential labour markets; b. accessibility to public transport facilities; c. the need to restrain the use of private vehicles ... (1987, EM1)	through statutory planning procedures
<b>Shopping</b>		
Permission will normally be granted for the extension of existing premises or for new development for shopping purposes within the designated major centres if this does not conflict with other policies in the plan (1987, SH4)	to encourage retailers to remain and expand with a high level of consumer demand (1987, SH3)	through statutory planning procedures
All developments including more than 2,000 m.sq. gross of shopping floor space must be sited within, or immediately adjacent to, the core area of one of the following shopping centres: Camden Town, Kilburn, Swiss Cottage, Finchley Rd or Kentish Town (subject to certain conditions) (1987, SH27)	to provide benefits to other retailers and improve the viability of the centres ... (1987, SH26)	through statutory planning procedures
The council will encourage the consolidation of the hierarchy and the improvement of shopping and service centres throughout the borough (1992, SH1)	to encourage retailers and service providers to stay in the borough (1992, 8.1)	through statutory planning procedures

**Table E.5 Camden - urban intensification policies with quality of life objectives 1987-1997**

Policy	Objective	Means of implementation
<p>Housing</p> <p>The LA will retain land already in residential use. This policy will be relaxed only in rare and exceptional cases where it conflicts with other high priorities of the plan (1987, HG14)</p>	<p>to increase the quantity of dwellings in the borough to meet the needs of the borough's existing and future population (1987, HG13)</p>	<p>through statutory planning procedures</p>
<p>Applications for changes of use which result in a loss of residential accommodation will not normally be permitted (1987, HG15)</p>	<p>to increase the quantity of dwellings in the borough to meet the needs of the borough's existing and future population (1987, HG13)</p>	<p>through statutory planning procedures</p>
<p>The council will encourage the fullest possible use of existing residential accommodation (1987, HG18)</p>	<p>to increase the quantity of dwellings in the borough to meet the needs of the borough's existing and future population (1987, HG13)</p>	<p>through statutory planning procedures</p>
<p>The LA will seek to increase the amount of land in residential use and to make the fullest use of all vacant or under-utilised sites suited to residential development so far as this is consistent with other borough Plan policies (1987, HG19)</p>	<p>to increase the quantity of dwellings in the borough to meet the needs of the borough's existing and future population (1987, HG13) and to bring all suitable under-utilised land into good use (1987, p.20)</p>	<p>The council will tackle the problem of vacant dwellings in its own stock and use the powers available to it to bring about a reduction in the high level of private sector vacancies (1987, p.20)</p>
<p>Density will be determined with the objective of securing the maximum accommodation of an acceptable standard in an acceptable environment. The normal minimum density for new developments will be 70 hra. The normal maximum density will be 100 hra for new developments which include accommodation for families with children, and will be 140 hra for other new developments (1987, HG21).</p>	<p>to increase the quantity of dwellings in the borough to meet the needs of the borough's existing and future population (1987, HG13)</p>	<p>through statutory planning procedures</p>

Provided that satisfactory conditions for residents can be achieved, densities higher than the maxima specified in Policy HG21 may be permitted in the circumstances listed below a. within the community areas b. at locations within easy walking distance of ii. the major shopping centres of Camden Town, Kilburn High Rd, Swiss Cottage/Finchley Road or ii. public open spaces and other leisure facilities which provide significant play and recreational opportunities. c. locations which are highly accessible to public transport. d. where the need for compatibility with the existing character of the area and the scale and nature of adjoining development dictates a high density (1987, HG23)

When considering density, the main objective will be the achievement of good quality housing in a satisfactory environment. The normal range for housing with a mix of unit sizes will be 175-210 hrh. The normal range for family housing will be 175-210 hrh (1992, HG15). Provided that satisfactory conditions for residents can be achieved in line with residential development and parking standards, densities higher than maxima specified in Policy HG15 may be permitted in the following circumstances: i. at locations within easy walking distance (400 metres) of public open spaces and other leisure facilities which provide significant play and recreational opportunities and where higher densities would be compatible with the surrounding area; OR ii where the need for compatibility with the existing character of the area and the scale and nature of adjoining development dictates a higher density, OR iii in schemes providing predominately affordable or special needs housing (1992, HG16)

Within the Community Area, the council will seek to increase the stock of housing accommodation through the development of suitable vacant or under-utilised sites and the use of empty property. The council will also assist in the establishment of a trust with a view to obtaining the rehabilitation and renewed use of hitherto vacant residential accommodation in mixed-use properties (1987, HG40)

to increase the quantity of dwellings in the borough to meet the needs of the borough's existing and future population (1987, HG13) and so residents can make efficient and full use of facilities and transport services (1987, p 21-22)

to help meet the borough's housing needs whilst also maintaining high standards in terms of living space and local character (1992, 7.19)

to increase the quantity of dwellings in the borough to meet the needs of the borough's existing and future population (1987, HG13)

through statutory planning procedures

by referring to the development standards when assessing applications (1992, 7.21)

through statutory planning procedures



<p>Within the Community Area, densities higher than 140 hpa. may be permitted, provided that satisfactory conditions for residents can be achieved (1987, HG41)</p>	<p>to increase the quantity of dwellings in the borough to meet the needs of the borough's existing and future population (1987, HG13)</p>	<p>through statutory planning procedures</p>
<p>Within the Community Area, developments which include accommodation for families with children may be acceptable at densities higher than 100 hpa. provided that satisfactory conditions for residents can be achieved (1987, HG42)</p>	<p>to increase the quantity of dwellings in the borough to meet the needs of the borough's existing and future population (1987, HG13)</p>	<p>through statutory planning procedures</p>
<p>The council will aim to protect existing residential accommodation (1992, SHG1) and to promote an increase in housing to meet the strategic requirement for the borough to provide 8000 additional units between 1987 and 2001, where these can be accommodated in line with detailed environment policies and standards, and within constraints on land availability (1992, SHG4)</p>	<p>to protect the residential community (1992, 2.2) and to increase the amount of housing in the borough to meet the range of sizes and types of dwellings needed (1992, 2.4-2.6)</p>	<p>through statutory planning procedures</p>
<p>The council will seek to retain buildings in residential use and resist proposals that would lead to a loss of residential floorspace... (1987, HG1)</p>	<p>to meet strategic and local needs for housing (1987, 2.7)</p>	<p>through statutory planning procedures</p>
<p>The council will seek the provision of residential floorspace ... in mixed-use schemes for redevelopment (1992, HG5)</p>	<p>to contribute to the borough's housing stock and to strengthen and support local communities, and to make areas more attractive by increasing vitality outside of working hours (1992, 7.6)</p>	<p>through statutory planning procedures</p>

The council will seek an increase in the amount of land in residential use and, subject to the operation of environment policies and development standards (including density), make the fullest use of all vacant or under utilised sites and buildings considered suitable for residential development. Sites with known potential for residential use (including mixed-use sites) have been identified in the Schedule of Land Use Proposals. Additional sites will be identified and publicised in subsequent planning briefs (1992, HG13). A change to residential use will be encouraged in existing non-residential buildings that are also surplus to requirements, provided an acceptable standard of accommodation can be achieved ... (HG14, 1992)

to ensure that the target of 8000 new dwellings is met between 1987 and 2001, to meet the borough's housing needs (1992, 7 16)

through favourable development control practices (1992, 7.16)

### Transport

The council will implement controls over new developments so that high density developments are located adjacent to public transport facilities and each area of the borough contains a wide range of land uses (1987, TR2).

to improve accessibility for residents, workers and visitors to Camden, particularly for those with poor mobility at present ... and to reduce the need for vehicular movement through related transport and land use development policies ... (1987, TR1)

by providing a mixture of land uses and activities within walking distance of people's homes and by ensuring that substantial new developments are able to utilise public transport services (1987, p.47)

The council will ensure development which attracts a significant number of trips is located in areas of the borough with a high level of public transport accessibility... (1992, TR1). The council will take account of transport and environmental effects in assessing land use development. In particular, it will oppose developments and land use changes: i. that disadvantage the provision and operation of public transport or ii that lead to increased use of private motorised modes (1992, TR2). The council will consider the cumulative impact of development proposals on the transport system when assessing individual planning applications (1992, TR3). The council will require developers of major schemes to undertake a Transport Impact Assessment to provide the following information: i. trip generating estimates; ii the effect of the development on highway capacity, pedestrians, cyclists, public transport and people with a transport disadvantage; and iii the effect of additional traffic on environmental conditions (1992, TR4).

to ensure conditions do not worsen for the transport disadvantaged, and to aim to allow equal access to all members of the community; to ensure that energy efficient modes of transport are desirable, such as public transport, walking and cycling (1992, 1.25-1.26)

by considering the cumulative effects on transport of any proposed new development and by refusing land use changes which worsen accessibility to local facilities or that increase overall travel distances to local facilities (A map of accessibility by public transport has been produced to aid such decisions) (1992, 1.26)

## Shopping

Permission will normally be granted for the extension of existing premises or for new development for shopping purposes within the designated major centres if this does not conflict with other policies in the plan (1987, SH4)

Permission will normally be granted for the extension of existing premises or new development for shopping use of below 2,000 m.sq, within the district centres ... (1987, SH12) and retail activity will be encouraged and the further loss of shopping floorspace will be restricted in the 'core frontages' of the district centres ... (1987, SH13)

to maintain and encourage a number of major centres in the borough in order to ensure that residents will have relatively easy access to shopping centres offering a wide range of goods and services ... (1987, SH3)

to ensure that residents of the borough have access to centres which meet more local needs than the major centres, and provide a range of local convenience shops (1987, SH9) and to ensure that residents of the borough are within reasonable walking distance of centres which contain at least one of the following local convenience uses. A standard of 400m or an average 10m walk is taken to be a reasonable walking distance

1. supermarket/grocer
2. butcher
3. chemist
4. newsagent
5. greengrocer
6. post office
7. baker
8. off-licence
9. launderette
10. iron monger/hardware store (1987, SH13)

The council will encourage the consolidation of the hierarchy and the improvement of shopping and service centres throughout the borough (1992, SH1)

All developments including more than 2,000 m.sq. gross of shopping floor space must be sited within, or immediately adjacent to, the core area of one of the following shopping centres: Camden Town, Kilburn, Swiss Cottage, Finchley Rd or Kentish Town ... (subject to certain conditions) (1987, SH27)

to provide shopping and other facilities within easy access for all Camden residents (1992, 8.1)

to ensure that major new retail developments are located in established shopping centres where they are more easily accessible to all members of the community ... (1987, SH26)

through statutory planning procedures

through statutory planning procedures

through statutory planning procedures

through statutory planning procedures

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**Resources, implementation and monitoring**

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The council will encourage proposals to incorporate a mix of land uses appropriate to the scale and location of development (1992, RE5)

to help improve local amenity (1992, 9.5)

through the use of planning obligations where appropriate (1992, 9.5)

The council will promote the re-use of surplus land and buildings for priority uses, defined as housing ... social and community uses... or public open space (1992, RE3)

to meet strategic and local needs and ensure that residential communities are provided with a high quality of environment and the supporting services and facilities they need. And to assist in regeneration to contribute to the city's life and character (1992, 9.8)

through statutory planning procedures

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**Economic activities**

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The council will ensure that any expansion of business uses is directed towards areas with a high level of public transport accessibility in accordance with the broad objectives and structural framework of the plan (1992, SEC3)

to reduce the impact of traffic on local residents (1992, 2.5)

through statutory planning procedures

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**Leisure and culture**

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The council will normally be sympathetic to proposals for the development of leisure (cultural) facilities in areas identified as having a high level of public transport accessibility (1992, LC3, LC18)

to make such facilities easily accessible to Camden residents, and to reduce the harmful effects of increased traffic to local residents (1992, 7.3)

through statutory planning procedures

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**Tourism**

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The council has defined the following areas of high public transport accessibility as having potential for the expansion of tourism-related uses: Kings Cross Special Policy Area, Central Activities Zone, Major Centres (1992, T3)

to contribute to the vitality of the areas and improve accessibility for local people to tourist attractions too and to help address the problems to local residents of increased vehicular traffic (1992, 5.6)

through statutory planning procedures

**Table E.6 Camden - urban intensification policies with environmental objectives 1987-1997**

Policy	Objective	Means of implementation
<b>Transport</b>		
The council will implement controls over new developments so that high density developments are located adjacent to public transport facilities and each area of the borough contains a wide range of land uses (1987, TR2)	to reduce the need for vehicular movement by related transport and land use development policies (1987, TR2)	through statutory planning procedures
<b>Urban design, conservation and the environment</b>		
The council will initiate and support schemes involving the landscaping and/or bringing into appropriate use, temporary or otherwise, of derelict or unused open space (1987, UD40).	to use derelict sites to improve the quality of the environment and provide much needed benefits for the local community (1987, p.67)	through statutory planning procedures
<b>Resources, implementation and monitoring</b>		
The council will promote an increase in energy efficiency and the sustainable use of land and resources (1992, RE3).	to ensure that individual development decisions are taken in an overall strategic framework that reflects environmental policies such as energy conservation and the need to reduce global warming (1992, 9.3).	by ... promoting the full and effective use of land; reducing the need to travel and encouraging trip generating developments to be closely related to public transport networks with spare capacity. The council will also provide information on sites development and building design information (1992, 9.3)
The council will require schemes for development which are likely to attract a significant number of trips to be located in areas which have a high level of public transport accessibility... (1992, RE4).	to reduce the number of trips made by energy inefficient modes of transport, and to reduce the impact on residential areas (1992, 9.4)	through statutory planning procedures
The council will encourage proposals to incorporate a mix of land uses appropriate to the scale and location of development (1992, RE5).	to help achieve energy efficiency and sustainability (1992, 9.5)	through the use of planning obligations where appropriate (1992, 9.5)
<b>Environment</b>		
When assessing proposals for development the council will consider their energy efficiency and expect them to minimise the overall energy demand by: a. reducing the need for travel and minimising journeys by car... e. the use of alternative more efficient forms of energy such as CHP ... (1992, EN22)	to reduce CO2 emissions (EN22, 1992)	through development control and the promotion of the issues within Camden (1992, EN6)

Where possible contaminated and unstable land should be brought back into use (1992, EN27, EN28)

to make the most of the scarce land resource (1992, 10.7, 10.8)

by encouraging developers to undertake testing and report to planning. The council will look favourable on any proposals which reclaim such land (1992, EN8)

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## Transport

The council will ensure development which attracts a significant number of trips is located in areas of the borough with a high level of public transport accessibility ... (1992, TR1). The council will take account of transport and environmental effects in assessing land use development. In particular, it will oppose developments and land use changes:

- i. that disadvantage the provision and operation of public transport or ii that lead to increased use of private motorised modes (1992, TR2). The council will consider the cumulative impact of development proposals on the transport system when assessing individual planning applications (1992, TR3)

The council will require developers of major schemes to undertake a Transport Impact Assessment to provide the following information: i. trip generating estimates; ii the effect of the development on highway capacity, pedestrians, cyclists, public transport and people with a transport disadvantage; and iii the effect of additional traffic on environmental conditions (1992, TR4)

to help tackle the serious environmental problems affecting the borough such as air pollution and the negative effects of traffic congestion (1992, 1.25)

by considering the cumulative effects on transport of any proposed new development and by refusing land use changes which worsen accessibility to local facilities or that increase overall travel distances to local facilities (A map of accessibility by public transport has been produced to aid such decisions) (1992, 1.26)

**Table E.7 Bromley - urban intensification policies with economic objectives 1987-1997**

Policy	Objective	Means of implementation
<p><b>Offices</b> Bromley town centre will be the preferred office location for major office development (1985, p.26)</p>	<p>to make the most of the existing office area, including using public transport, and to stop office development encroaching into residential areas to improve the employment choices and opportunities for Bromley's residents (1985, p.26)</p>	<p>by only permitting major office development in Bromley town centre (1985, p.26)</p>
<p>Proposals for limited office development will normally be acceptable in the district centres of Orpington, Beckenham, Penge and West Wickham ... (1985, p.26). Proposals for small scale office development will normally be acceptable in other district centres and local shopping parades ... (1985, p.27)</p>	<p>to provide employment opportunities for local residents and service local needs (1985, p.27)</p>	<p>by allowing office developments of max. 30,000 ft.sq. in the district centres, 2,000 ft.sq. in other district centres and shopping areas (1985, p.27)</p>
<p><b>Industry and warehousing</b></p>		
<p>The council will continue to maintain and make available a register of vacant industrial sites and premises (1985, p.35)</p>	<p>to bring about the most efficient use of land suitable for industrial development (1985, p.35)</p>	<p>by collaborating with industrial estate agents so that all prospective developers are aware of potential sites (1985, p.35)</p>
<p><b>Shopping</b></p>		
<p>The council will resist proposals likely to prejudice the strategic shopping role of Bromley town centre' (1985, p.40; 1994, S1)</p>	<p>to strengthen Bromley town centre's role as the major shopping centre in the area (1985, p.40; 1994, p.8)</p>	<p>by not allowing proposals which contravene the policy (1985, p.40; 1994, p.8)</p>
<p>The council will not permit the development of major new shopping facilities, in particular hyper markets and superstores, outside the confines of existing shopping centres (1985, p.42)</p>	<p>to maintain the vitality and attractiveness of existing shopping centres (1985, p.42)</p>	<p>by adhering to policies which restrain development such as green belt and other protected designations, and not permitting any development which contravenes the policy (1985, p.42)</p>
<p>The council will seek to guide proposals for large shopping facilities to the borough's established centres or edge of centre locations. Outside established centres, large food stores and retail warehouses (of 4,000 m.sq. gross floorspace and above) will only be permitted where it can be demonstrated that:</p> <ul style="list-style-type: none"> <li>i. the vitality and viability of existing centre will not be seriously affected by the proposal ... (1994, S5)</li> </ul>	<p>to ensure that new retail development does not prejudice the vitality and viability of existing centres (1994, p.27)</p>	<p>through statutory planning procedures</p>

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**Business**

Bromley town centre will be the preferred location for major office development ... (1994, EMP1)

to make use of Bromley town centre as it has capacity for further limited expansion and to make use of good public transport facilities (1994, 4 16)

through statutory planning procedures

Proposals for limited office development will normally be acceptable in district centres (1994, EMP2) and proposals for small scale office development will normally be acceptable in other district centres and local shopping parades ... (1994, EMP3)

to provide employment opportunities for local residents (1994, p.94)

through statutory planning procedures

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**Green Belt, Open space and the Natural environment**

only allow development in the green belt in limited circumstances (1994, G2)

to assist in urban regeneration (1994, p.45)

through statutory planning procedures



**Table E.8 Bromley - urban intensification policies with quality of life objectives 1987-1997**

Policy	Objective	Means of implementation
<p><b>Housing</b></p> <p>Residential density: proposals designed predominately for family housing should normally fall within the range 40-60 habitable rooms per acre (hra); proposals for non-family accommodation should normally fall within the range 55-70 hra. (1985, p.18)</p>	<p>to ensure that new development takes account of the need to provide good environmental conditions, in particular to provide for private garden space in proposals for family housing, whilst avoiding the wasteful use of housing land (1985, p.19)</p>	<p>by permitting developments which concur with the standards, but allowing some flexibility for good design (1985, p.18)</p>
<p>The conversions of single dwellings into two or more self-contained units normally will be permitted ... except where the council considers that it would be unsuitable for residential use, detrimental to the character of the area, over-development, or unsuitable because it means the loss of a family dwelling, or causes traffic and parking problems (1985, p.19)</p>	<p>to increase the supply of smaller units; to ensure that the special requirements of small households are taken into account (1994, 3.39)</p>	<p>by having a positive policy towards conversions</p>
<p>When considering proposals for the conversion of single dwellings into two or more self-contained units, the council will have regard to the existing character of the area and will normally permit such proposals (except in certain circumstances) (1985, p.98)</p>	<p>to retain the general level of housing stock in and around the town centre, within an enhanced environment, by encouraging new residential development, particularly in the form of smaller units, to replace dwellings that may be lost to redevelopment (1985, p.98)</p>	<p>by applying a positive policy to conversions in Bromley's large older housing (but also taking into consideration cumulative impacts on the environmental character of the area and traffic generation potential (1994, 3.39-3.42)</p>
<p>Within the housing areas defined on the Inset Proposals Map the council will resist all proposals which involve changes of use or redevelopment for purposes other than housing (1985, p.98)</p>	<p>to retain the mix of housing types in the area and contribute to meeting the need for small unit accommodation (1985, p.99)</p>	<p>through statutory planning procedures</p>
<p>Within the Ravensbourne Road housing area proposals for the residential redevelopment of suitably assembled sites at densities higher than those existing will be considered favourable by the council ... (1985, p.99)</p>	<p>to meet the borough's housing requirement of 10,800 additional dwellings between 1987 and 2001 in existing residential areas and on land which is not allocated for any other purpose (1985, p.99)</p>	<p>through statutory planning procedures</p>

The council will normally permit residential extensions for use by a member of the household provided that there are adequate safeguards to prevent its severance from a separate unit and that there is no conflict with other policies of the plan (1994, H4).

to provide accommodation for family members, e.g. an elderly person or disabled relative (1994, 3.31)

by allowing only developments which are designed to form an integral part of the main dwellings and by applying a condition restricting occupancy to members of the family of those living in the main dwelling (1994, 3.31)

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#### Shopping

The council will seek to guide proposals for large shopping facilities to the borough's established centres or edge of centre locations. Outside established centres, large food stores and retail warehouses (of 4,000 m.sq. gross floorspace and above) will only be permitted where it can be demonstrated that: ...  
iii. the proposal is accessible to shoppers using either public or private transport; iv. the provision of car parking is in accordance with the council's adopted standards ... (1994, S5)

to ensure that new retail development is located to benefit the maximum number of people and is accessible to public transport (1994, p.27)

through statutory planning procedures

**Table E.9 Bromley - urban intensification policies with environmental objectives 1987-1997**

Policy	Objective	Means of implementation
<b>Green belt, open space and recreation</b>		
Only allow development in the green belt in limited circumstances (1985, p.58,59; 1994, G2)	to protect the Green Belt from unsuitable development and encourage greater use of it for outdoor recreation (1985, p.57) to safeguard the countryside from further encroachments; to check the unrestricted sprawl of the urban area; and to prevent London merging with the neighbouring towns (1994, 7.3)	by using development control (1985, p.58)
<b>Community and utility services</b>		
The council will bring into appropriate use any land in ownership no longer required for statutory purposes and will press for land no longer essential for the operational requirements of other public services to be released for other uses (1985, p.80)	to make the most efficient and beneficial use of land in the borough (1985, p.80)	through statutory planning procedures
<b>Transport</b>		
All development proposals will be assessed for their contribution to traffic generation and their impact on congestion and safety, particularly on the primary road network and against the present and potential availability of public transport, and its capacity to meet increased demand (T3, 1994)	to encourage greater use of public transport through improvements to the public transport network and by greater policy integration between land use and transport planning (1994, T3)	through statutory planning procedures