THE draft LONDON PLAN 2017
TOPIC PAPER
Housing Density

1   Summary

1.1   This paper sets out the key findings of six research projects undertaken as part of the full review of the London Plan and describes how this research has influenced the new density policy in the draft London Plan, Policy D6-*Optimising housing density*. The key findings are listed by policy issues rather than by project as some issues were examined in multiple projects. Appendix A of this paper summarise the history and development of the current density policy.

2   Introduction

2.1   Increasing density is a key way of delivering more homes where land supply is constrained. Existing (2016) London Plan Policy 3.4 (Optimising Housing Potential) aimed to ensure that development optimises housing output for different types of locations in London and has an associated sustainable residential quality (SRQ) density matrix, London Plan Table 3.2 (shown below), which sets ranges for appropriate residential density in different urban character settings and with different levels of public transport accessibility.

Table 3.2 Sustainable residential quality (SRQ) density matrix (habitable rooms and dwellings per hectare)

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

Notes to Table 3.2

Appropriate density ranges are related to setting in terms of location, existing building form and massing, and the index of public transport accessibility (PTAL). The setting can be defined as:

Central – areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 metres walking distance of an International, Metropolitan or Major town centre.

Urban – areas with predominantly dense development such as, for example, terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys, located within 800 metres walking distance of a District centre or, along main arterial routes

Suburban – areas with predominantly lower density development such as, for example, detached and semi-detached houses, predominantly residential, small building footprints and typically buildings of two to three storeys.

2.2 The majority of approved developments in London have been delivered at densities beyond those recommended in the SRQ density matrix for every year since the commencement of the London Plan in 2004 apart from 2012/13. As part of the full review of the London Plan the GLA commissioned a series of six research projects to assess the nature of the developments the existing policy approach was delivering and consider if an alternative or amended approach is required to deliver sustainable development in London. A description of each project is set out below.

Description of Density research projects

Density project 1: Defining, measuring and implementing density standards in London – Examined why and how housing density has been measured in London, and the factors that influence density outcomes. The project recommends how we should measure density in the future.

Density project 2: Lessons from higher density development – Investigated how developments that are above the density matrix maximum range in London have performed:
- to find out what has worked and what hasn't
- how this knowledge can be applied to future policy to ensure future developments are successful and sustainable.

The project used case studies of developments with a range of densities and building typologies, including tall buildings. The research focused on the: design, management, and quality of life in high-density developments.

Density project 3: Affordability, development costs and viability – Explored the relationship between increasing density, building height and development costs, viability and the delivery of affordable housing.

NB. Projects 2 and 3 were produced by the same consultant team and presented together in one report.

Density project 4: Exploring character and development density – Reviewed the policy history of the SRQ density matrix and considered the appropriateness of its current character settings. The project recommends changes to these character settings. It also updated the map of character settings defined in the London Plan SRQ density matrix that had been used in the 2013 SHLAA, and this updated map was used in the 2017 SHLAA.

Density project 5: Why else is density important? – Reviewed the strategic linkages between density policy and demographic and economic growth, employment creation and productivity.

Density project 6: Housing density matrix: TfL's analysis of connectivity factors for GLA – This project by TfL look at alternative measures of connectivity other than PTAL to explore if the level of access to jobs and services of a site could be taken into account when determining the appropriate development density.

3   Key findings of research projects

Current SRQ density matrix policy

a) As explained in more detail in Appendix A, the basis of the approach that led to the Sustainable Residential Quality (SRQ) density matrix was that the appropriate density for a site should result from a creative design-led approach which responds to the particular characteristics of a site, its surroundings and the needs of future residents rather than by applying general density standards. It also linked the provision of car parking to density, reflecting the need to give more land over to housing in higher density developments.

b) The density matrix was only meant to be a conceptual and indicative tool of what could be developed on a site, and not to be used prescriptively. However, its apparent numeric simplicity has

led to it dominating the policy approach to density. Alterations to the matrix between 2000 and 2008 have complicated its application despite making it visually simpler.

Density outcomes in London

c) The density matrix is not being followed, 50% of development is above the matrix maximum for its location, 25% is double the maximum and 15% is below the minimum, i.e. only 35% of development is within the appropriate density matrix range.

d) The research suggests that density outcomes in London are the result of market forces, conditioned by national policy (a restriction on greenfield development added to the existing Green Belt constraint in the Wider South East), and interactions between developers and local planning authorities, reflecting a combination of market judgements about the preferences of prospective occupants and of professional/political judgements about suitability/fit to an urban context, attitudes of local residents and other economic/environmental impacts.

e) The research also suggests that increases in density from 1996–2011 have not increased overall housing delivery. A relatively constant level of housing is being delivered but at higher densities, implying that less land is being developed for housing. Research findings suggest that the reason for this trend is unclear but simply allowing higher densities won't necessarily lead to the delivery of more housing without addressing the underlying reason(s) for the trend.

What density measures should be used in the London Plan?

f) The research findings suggest that as a strategic authority the Mayor should only use a density metric in the London Plan to ensure sites deliver enough housing to meet need, and so denser development is directed to locations which have good public transport and local services thus reducing the need to use a car.

g) The primary density measure should be habitable rooms or bedrooms per hectare if information on habitable rooms in not available. Overall it would be highly desirable to monitor a range of variables – dwellings; habitable rooms/bedrooms; sq. meterage (floor area ratio); and expected first tenure as this also impacts on likely space and service usage.

h) Variations in where a site boundary is drawn hamper meaningful comparisons of site densities. Thus, multiple measures of density such as floor area ratio give a better metric by which to understand the built form of a development.

Role of density minimums and maximums in London Plan policy

i) The research suggests that given the need both for additional housing (at the London or wider regional level, rather than purely locally) and to reduce dependence on the private car (again in a wider interest than that of a borough) there is a case for the Plan to encourage higher densities in appropriate locations by setting minimum density standards.

j) The research findings suggest that there is no case for continuing to set a maximum level, since the appropriate criteria for limiting density are judgemental ones, and decisions about what is qualitatively unacceptable are most appropriately decided by the local authority or (where it has strategic significance) the Mayor.

Lesson from high density development

k) Research indicates that there is no universal point at which density is unacceptable; this point is based on personal and cultural perception.

l) Research also finds that there are no inherent problems with recent high density (above the matrix maximums) development and they are popular with their residents. The key to high density schemes being successful places to live is: good design (the quality of the internal design and the external space in which they sit), day to day management and servicing, all planned from the outset of the scheme.

m) As density and height increases, these factors become more important and greater scrutiny is needed to maintain the quality of high density and high-rise living. The exact density at which this greater scrutiny should apply will always be somewhat arbitrary but a density of 500 dph or height of 15 storeys is suggested.

Implications of density and height for viability

n) Development viability will determine which building typologies get developed in different areas of London. Mid-rise towers and high density infill are likely to be the most viable building typology in most areas of London.

o) Taller buildings tend to have higher development costs but this can be mitigated by higher values. Where sales values are at their highest then the tallest buildings are able to provide market and affordable housing at very high density, which is important in terms of maximising delivery. However, in lower value areas mid-height and then lower forms of development tend to have better viability, although inevitably the densities are likely to be reduced as well.

Economic productivity and the role of density at the regional and local scale

p) If housing density were increased across London's functions region (i.e. London + surrounding Outer Metropolitan Area (OMA) some 30 miles wide) it is likely to only marginally increase economic productivity. However, encouraging and enabling more employment growth to take place within this area, could potentially provide a larger boost to economic productivity. At the smaller scale increasing housing density in medium size town centres in suburban areas could improve productivity at the local scale.

TfL new connectivity measures

q) The addition of a range of connectivity measures such as access to jobs within 45 mins, station and town centre proximity ability to board could enhance the existing WebCAT system. This could inform planning density decisions and help identify where investment is needed in more infrastructure and facilities.

4 Description of the new density policy in the draft London Plan

4.1   The findings of the density research projects and the requirement of the NPPF have led to the development of the new density policy in the draft London Plan Policy D6 - *Optimising Housing Density*, and informed the qualitative aspect of housing development detailed in Policy D4 - *Housing quality and standards*.

Design and infrastructure led rather than numbers led density

4.2   Rather than continuing to use a set of predetermined density ranges to manage the density of all residential development in London, such as those in the London Plan SRQ density matrix, the approach to density taken in Policy D6 focuses on the key elements that are required to deliver successful sustainable residential development. Policy D6 draws on the principles used in the sustainable residential quality (SRQ) approach to establish appropriate densities for a site, developed by consultants Llewelyn-Davies in 1998[1] and summarised in Appendix 1. The policy sets out that the that the optimum density for a site should be determined by a design-led approach. In this approach, the appropriate form and scale of new development is established through a design process that takes account of the site context, in terms of the surrounding built form, proximity and access to services and capacity of supporting existing and planned infrastructure, particularly public transport.

4.3   The approach to optimising density set out in Policy D6 is supported by Policy D1 London's form and characteristic and Policy D2 Delivering good design, particularly parts A to C. Policy D1 details the required physical characteristics of the places new development should create. Policy D2 requires Development Plan and area-based strategies to evaluate the current characteristics of an area

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[1] Sustainable Residential Quality: new approaches to urban living produced by Llewelyn-Davies in association with Urban Investment Partnership, LRC & Savills. For LPAC, DETR & GOL. 1998.

including its infrastructure, and use this evaluation of evidence to establish what the most appropriate form of development is for an area to create places which meet the requirements of Policy D1. Thus, the plan-making process helps establish the optimum density for a site. A plan-led approach to the development of an area (e.g. developing a strategic framework and/or a masterplan for an area rather than uncoordinated development of individual sites) can enable it to support higher densities by enabling the successful integration of the new built form with its surrounding context and planning the provision on the necessary supporting infrastructure.

4.4 Policy D6 is in accordance with paragraph 58 of the NPPF which requires planning policies ensure that development 'optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses and support local facilities and transport networks'.

Scrutiny of design and management
4.5 Following the recommendations of density research projects 2-3 - Lessons from higher density development Policy D6 requires that the higher the density of a development the greater the security should be in the planning process of the development's design and the proposed ongoing management. The exact density at which a development should be subject to a higher level of scrutiny is somewhat arbitrary. Density Project 3 recommended that the point at which to require a higher level of scrutiny should be above 500 dph or 15 storeys in height. Given that what is considered high density or a tall building varies in different parts of London, a more nuanced measure has been used in policy D6 for requiring additional scrutiny. The maximum density levels in the 2016 London Plan SRQ density matrix for the three different PTAL groups (0-1, 2-3 and 4-6) provide a recognised level for what would currently be considered high density for clearly identifiable areas of London. Therefore, these density levels have been used in Policy D6 to determine when a higher level of scrutiny is required of a development. i.e. developments where the density is above 110 units per hectare in areas of PTAL 0 to 1; or 240 units per hectare in areas of PTAL 2 to 3; or 405 units per hectare in areas of PTAL 4 to 6. Policy D2F requires a higher level of design scrutiny if the development is a tall building, which is locally defined by each Borough in accordance with Policy D8-Tall buildings.

4.6 Projects 2-3 identified aspects of a residential development's design and management that are important to achieving successful places to live. These aspects have been included in Policy D6 and Policy D4 as elements that require greater security in the planning process. Policy D4 provides greater detail on the qualitative aspects of residential developments that need to be fully considered in the design and planning process. The minimum housing space standards in Policy D4 play an important role in ensuring that irrespective of the density of a developments, the quality of the internal residential units is maintained.

Multiple density measures
4.7 As recommended by density research Projects 1 and 2-3, Policy D6 requires that a range of measures of density are provided for a development to enable better comparison of the density of developments on different sites and of different forms, and to better appreciate how it relates to its surrounding context.

Housing delivery
4.8 A potential concern with not having minimum housing density figures in the London Plan is that lower densities will be accepted by Local Planning Authorities and the supply of housing will be lower than would be the case if the minimum densities set out in the current density matrix were maintained. However, the evidence since the inception of the density matrix in London Plan policy is that the matrix does not effectively managing densities. Most residential development has been developed at densities above the appropriate density matrix range for its location, and 15 per cent of residential development has been lower densities than the minimum set out in the density matrix. Policy D6 focuses on ensuring land is used efficiently to create successful sustainable places to live. Where a development proposals does not demonstrably optimise the housing density of the site Policy D6 will enables it to be refused.

4.9   The key London Plan policy for ensuring London delivers the supply of housing needed to meet its housing need is Policy H1– Increasing housing supply, and the associated Borough housing targets set out in table 5.1. The 2017 London SHLAA details how these housing targets have been determined.

Appendix 1 - Lessons from the evolution of the current density matrix

A summary of the SRQ density matrix is also provided in *Project 4-Exploring character and development* density), and *Project 1- Measuring and defining density* explores the application of the SRQ density matrix in development density outcomes.

1 The density matrix is the outcome of studies in the late 1990s for the London Planning Advisory Committee (LPAC) by consultants Llewelyn Davies. The first study *Sustainable Residential Quality: new approaches to urban living* [2] examined how to intensify the use of urban land and buildings while maintaining and enhancing quality. It focused on how housing capacity could be increased by developing small infill sites in London's town centres and within 10 minutes walking distance of these town centres to create liveable neighbourhoods based on walking to access services and thus minimise car parking and car use.

2 The study used a design-led approach, following six design principles, to design theoretical developments on case study sites to estimate the number of housing units a site could potentially accommodate if parking levels were varied from 2 spaces per unit to no parking. The site locations were considered to be **sustainable** locations to develop as the sites could have lower parking requirements than typical borough policy would allow because they were close to local services and in locations with good public transport accessibility.

3 In addition to the location of the housing being sustainable in terms of access to services and public transport, the **sustainable residential quality** of the housing was defined as having three inter-related components. It should:
   - be enduring and robust
   - fulfil the functional requirements of residents
   - give pleasure and joy to those who experience it.

4 The six design principles used to guide the design of the new housing developments were:
   1. engender a feeling of safety
   2. provide clear definition of public and private space
   3. ensure mutual levels of privacy
   4. create a healthy environment
   5. produce robust and adaptable dwellings
   6. respect local character.

5 The key findings of the study were:
   - There is potential to significantly increase residential densities and at the same time improve the environmental quality of new residential development. This can be achieved through a **creative design-led approach**, which responds to the particular characteristics of a site, its surroundings and the needs of future residents.
   - The approach achieves both increased density and improved quality because the objective of **quality is addressed through design rather than by applying general density and parking standards.**

6 The study showed what level of density was appropriate for different types of sites depending on their location. The density varied with how near the site was to a town centre and the level of onsite parking provision. The lower the car parking provision the higher the housing density, as more land could be developed for housing. The theoretical designs reflect the typical building typologies of the late 1990s and thus do not necessarily reflect what would be developed on the same site today.

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[2] Sustainable Residential Quality: new approaches to urban living produced by Llewelyn-Davies in association with Urban Investment Partnership, LRC & Savills. For LPAC, DETR & GOL. 1998

7   From the site design experiments, a table summarising the ranges of densities and parking spaces that sites in different locations could accommodate was produced and this was called the SRQ matrix (shown below). The authors stressed that *"the matrix can only be a conceptual and indicative tool. It should not be seen as a prescriptive specification of different densities to different types of housing in different locations. Inevitably there will be circumstances when densities above and below the range will be appropriate. **Above all we believe that site specific design and quality considerations should be the predominant concerns rather than a pre-determined view about density"**.*

First iteration of the SRQ density matrix from LPAC Sustainable Residential Quality: Supplementary Advice, 1998

Table 1: LOCATIONAL/DENSITY/ PARKING MATRIX

CAR PARKING	2 SPACES PER UNIT (Option 1)		1 SPACE PER UNIT (Option 2)		NO CAR PARKING (Option 3)	
DWELLING MIX	Mostly Houses	Mix	Mix	Mostly Flats	Mix	Mostly Flats
LOCATION						
Sites within Town Centre Catchment Areas	150-250	200-300	250 - 500		500 - 700	
Sites along Transport Corridors and Sites Close to a Town Centre Catchment Area	150-250	200-300	200 - 400		300 - 500	
Currently Remote Sites	150-250	200-300	200 - 300		250 - 450	

NB
1) *Density ranges are based on the net developable area, i.e. they do not include any area beyond the site such as half the width of adjoining roads.*
2) *Densities are expressed as habitable rooms per hectare.*
3) *Shaded areas within the matrix are locations where, in general, it will not be appropriate to build at such densities with such parking standards.*

8   Following this first study, which focussed on small infill sites, a follow up study was completed in 2000 for larger sites and a refined SRQ matrix (shown below) was produced for all sites which more explicitly took account of public transport accessibility and introduced a "setting" component to take account of the surrounding built form when determining what would be an appropriate density for a new development. The **settings** (central, urban and suburban), were based upon an analysis of urban grain, land use, the form of existing housing and local facilities, and **were not mapped**. Within the SRQ Matrix, each setting was incorporated alongside the location category; however, location did not determine setting; for example, an area could be within a town centre, but its setting still either central, urban or suburban. The result was a matrix which acknowledged the link between location and setting, but which retained a clear distinction between them. The 2000 matrix also introduced the accessibility index, a forerunner for what would become Public Transport Accessibility Level (PTAL).

Second iteration of the SRQ density matrix from LPAC Sustainable Residential Quality (Large Sites): Supplementary Advice, 2000

			Option 1	Option 2	Option 3
Car Parking Provision			High 2 – 1.5 spaces per unit	Moderate 1.5 – 1 space per unit	Low Less than 1 space per unit
Predominant Housing Type			Detached & linked houses	Terraced houses & flats	Mostly flats

Location (Accessibility Index)	Setting	Option 1	Option 2	Option 3
Sites within Town Centre "Ped-Shed" (6↕4)	Central	*(shaded)*	*(shaded)*	650 – 1100
	Case Study Examples			2 | 3 | 10
	Urban	*(shaded)*	200 – 450 (8)	450 – 700 (8)
	Case Study Examples		9 | 11 | 16 | 21 | 22	9 | 11 | 16 | 21 | 22
	Suburban	*(shaded)*	150 – 250	250 – 350
	Case Study Examples		19	19
Sites along Transport Corridors & Sites close to a Town Centre "Ped-Shed" (3↕2)	Urban	*(shaded)*	200 – 300 (1)	300 – 450 (1)
	Case Study Examples		5 | 6 | 14 | 15 | 18	5* | 6* | 14 | 15 | 18
	Suburban	150 – 200	200 – 250	*(shaded)*
	Case Study Examples	7 | 13 | 20 | 23 | 24	7 | 13 | 20 | 23 | 24	
Currently Remote Sites (2↕1)	Suburban	150 – 200	*(shaded)*	*(shaded)*
	Case Study Examples	4 | 12 | 17		

N.B.
1. Density ranges are based on the net developable residential area within a site i.e. they include local amenity space, service roads and mixed uses with a residential component, but, exclude free standing non-residential uses within the site and any area beyond the site, such as half the width of adjoining roads.
2. Densities are expressed as habitable rooms per hectare.
3. Shaded areas within the matrix are locations where, in general, it will not be appropriate to build at such densities with such parking standards.

9   The SRQ matrix in the 2004 London Plan uses a version of this second matrix, however it added a translation of the habitable rooms/ha measure to units/ha (shown below). The method used to convert hab. room/ha range into a unit/ha range resulted in significantly wider range of acceptable densities in units/ha than is given in hab. rooms/ha.

table 4B.1 Density location and parking matrix (habitable rooms and dwellings per hectare)

Location	Accessibility Index	Setting	Car parking provision — High 2 – 1.5 spaces per unit Predominant housing type — Detached and linked houses	Car parking provision — Moderate 1.5 – 1 space per unit Predominant housing type — Terraced houses & flats	Car parking provision — Low Less than 1 space per unit Predominant housing type — Mostly flats
Sites within 10 mins walking distance of a town centre	6 to 4	**Central**			650 – 1100 hr/ha 240 – 435 u/ha Ave. 2.7hr/u
		Urban		200 – 450 hr/ha 55 – 175 u/ha Ave. 3.1hr/u	450 – 700 hr/h 165 – 275 u/ha Ave. 3.0hr/u
		Suburban		200 – 300 hr/ha 50 – 110 u/ha Ave. 3.7hr/u	250 – 350 hr/ha 80 – 120 u/ha Ave. 3.0hr/u
Sites along transport corridors & sites close to a town centre	3 to 2	**Urban**		200 – 300 hr/ha 50 – 110 u/ha Ave. 3.7hr/u	300 – 450 hr/ha 100 – 150 u/ha Ave. 3.0hr/u
		Suburban	150 – 200 hr/ha 30 – 65 u/ha Ave. 4.4hr/u	200 – 250hr/ha 50 – 80 u/ha Ave. 3.8hr/u	
Currently remote sites	2 to 1	**Suburban**	150 – 200 hr/ha 30 – 50 u/ha Ave. 4.6hr/u		

Site setting can be defined as:
- Central – very dense development, large building footprints and buildings of four to six storeys and above, such as larger town centres all over London and much of central London.
- Urban – dense development, with a mix of different uses and buildings of three to four storeys, such as town centres, along main arterial routes and substantial parts of inner London.
- Suburban – lower density development, predominantly residential, of two to three storeys, as in some parts of inner London and much of outer London.

10   The SRQ matrix was significantly altered for the 2008 London Plan. The changes came about in response to a detailed review of the density matrix which was undertaken in 2006. The key changes to the SRQ Matrix were:
- the removal of the car parking category
- the incorporation of housing typology into the definitions of each setting
- PTAL was given equal weighting to setting and placed on the top of the matrix
- the previous distinction between location and setting was discontinued, with the proximity to various types of town centres and transport corridors incorporated into the definitions of each setting, as detailed in the accompanying notes.

London Plan 2008 SRQ Density Matrix

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

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

Indicative Average Dwellings Size (vertical axis label)

The setting can be defined as:
- central – areas with very dense development, a mix of different uses, large building footprints and typically buildings of four to six storeys, located within 800 metres walking distance of a International, Metropolitan or Major town centre
- urban – areas with predominantly dense development such as for example terraced houses, mansion blocks, a mix of different uses, medium building footprints and typically buildings of two to four storeys, located within 800 metres walking distance of a District centre or, along main arterial routes
- suburban – areas with predominantly lower density development such as for example detached and semi–detached houses, predominantly residential, small building footprints and typically buildings of two to three storeys.

11 The evolution of London's SRQ matrix between 2004 and 2008 is therefore one of increasing detail and complexity in setting definition, largely the result of an overall simplification of the format of the matrix itself and the combination of location and typology within setting. Since 2008, the SRQ matrix and accompanying notes have remained unchanged.

12 **While the format of the matrix has been simplified, the overall complexity of the characteristics included has remained largely unchanged,** and the merging of location and setting in particular has been problematic for three primary reasons:
- Firstly, by introducing the locational characteristic of proximity to town centres, and ascribing a numerical threshold (800m), the perceptual and more subjective built form characteristics and their use in describing and contextualising the local character of an area take on lesser importance, as they are in effect superseded by proximity to centres;
- Secondly, there is a correlation between the town centres and PTAL, which features along the top of the matrix. Furthermore, it can be argued that proximity to town centres is more a reflection of connectivity than 'character'.
- Thirdly, applying a definitive numerical characteristic within the definition of setting, which lessens the contribution of the perceptual built form characteristics, contradicts the general purpose of the matrix, which is designed to be a contextual tool for discussion, rather than prescriptive.