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The draft plan is in contravention of planning legislation and policy. Set out below is a ten-point summary:

1. The document states that Mayor accepts that the draft plan does not comply with National Policy, but that he believes the “scale of his victory” is sufficient for him to ignore that the Greater London Authority Act 1999 and The National Planning Policy Framework of 2012. Legislation requires the London Plan to be consistent with national policy and guidance.
2. The draft plan seeks to build 65,000 new houses each year, 32,500 of which must be affordable. No finances are given for the affordable housing, but the cost over ten years is estimated to be circa £80 billion, i.e. more than twice the budgeted cost of HS2. The Mayor accepts that there are inadequate finances for the draft plans to be delivered.
3. To facilitate the housing targets, there is to be presumption in favour of small housing schemes (between 1 and 25 homes) on sites that are within 800 meters of a Tube Station (i.e. more than half of London) regardless of whether the proposal involves the demolition of a building making a positive contribution in a Conservation Area. There is an exemption for listed buildings, but the exemption doesn’t apply to a listed building’s setting.
4. The current plan is cautious about tall buildings and warns they can have “*significant detrimental impact on local character*”.

The new plan triumphantly announces that “*Tall buildings have a role to play in helping London accommodate its expected growth*” and seeks to justify their use because they ‘help people navigate to key destinations.’

What rubbish. People use maps and phones to navigate, and it is a myth that super-towers can make a significant contribution to London’s affordable housing needs. History shows that they breed little criminals, cause isolation and loneliness and a myriad of other serious social problems.

The traffic-free paved & 'cycle lane' area outside Essential Living's hideous luxury tower block on Highgate Hill in Archway is now one of London's most dangerous. Commuters must now run the gauntlet of violent muggers on bicycles.

Where will the Mayor's budget come from that will enable him to deal with subsequent, serious, crippling social issues?

Mid-sized buildings often have a higher density and more affordable housing than taller buildings. London has spent the last thirty years trying to understand and correct the mistakes of post-war development, and London should learn from its past.

5. To prevent development of sites without sufficient density all applications with sub optimal density are to be refused. This appears to mean that any house not converted to flats would be automatically refused planning permission regardless of the application's significance, merit, desirability or public benefits and effectively puts a hold on any changes to a large percentage of London's housing stock.

6. The draft plan seeks to maintain the status quo with air quality. For example, whilst gas boilers produce roughly half the NOx pollution, and their emission can be reduced with new gas boiler technology, the draft plan does not promote the change over which left to its own devices will take more than 25 years.

This is not consistent with Mr Justice Graham's recent findings against the Mayor and Others at the Royal Courts of Justice who stated that the state needs to bring air quality into compliance "*as soon as possible*", and that "*cost is not a determining consideration in choosing the method*".

7. The draft plan states that 80% of all trips in London should be made by foot, cycle or public transport by 2041. Excluding public transport, in central London the bulk of the traffic is delivery trucks, how does the Draft Plan envisage deliveries will be made?

In terms of personal travel, it is not possible for all the very young, old and disabled, to travel by foot, cycle or public transport.

And, if the Mayor plans to exclude most bus routes from the West End's shopping, theatre, restaurant and museum areas - such as Oxford Street! - how does the Mayor propose people keep their jobs if they can't actually get to them in all weathers, or feel safe walking through say, Regents Park, especially the dark during the winter months with no black cabs around because the Mayor and TfL have banned traffic in all of London's Royal Parks?

The target for a reduction in air pollution needs to be realistic and expressed in a more inclusive way.

Preventing bus routes such as the Arriva 268 from idling at bus stops so that they may stick to a newly imposed schedule - longer journey times but fewer buses - would be a start.

8. The draft plan lists an impressive set of transport projects. Whilst it acknowledges there is insufficient funding the draft plan doesn't try to do more with existing infrastructure.

Modernising signalling and rolling stock can increase train frequency (and thus capacity) without the huge capital investment associated with new track.

We need more bus routes to run through major commerce areas such as Oxford Street, not fewer. Cutting London's bus routes will only encourage people's use of idling, polluting Private Hire Cars such as Uber - something the Mayor should tackle seriously.

9. The Draft Plan states that the principles of national Green Belt policy should apply to Metropolitan Open Land but then proceeds to not give it the same status.

10. In conclusion the key objective of increasing affordable housing is laudable, but the targets are

- unrealistic

- unfunded

- unpopular

and unsustainable.

What's more, the targets are not designed to benefit Londoners but to further the interests of overseas offshore investors such as M3 Capital Partners - behind the hideous 24-storey luxury tower block at 100 Avenue Road NW3 - with whom the Mayor may have met on his trip to Chicago within weeks of his 'victory'.

Further in the attempt to achieve this key objective the draft plan is seeking to set aside much of the existing planning framework, in a way that is detrimental to London and not in accordance with legislation and National Planning Policy.

The draft plans must be rejected.

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