

**Jinder Ubhi**

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**Subject:** NEW DRAFT LONDON PLAN

**Categories:** Red Category

## **NEW DRAFT LONDON PLAN: COMMENTS**

Having taken the time to read the entire document twice, it is of concern that the whole plan is based on unlimited growth, and that quantity of people/units takes precedence over quality of life. “Big” is not always “Beautiful” and “Bigger” is not always “Better”. Scientific research exists to prove that overcrowding leads to stress and mental health issues; and although it may be argued that providing more homes will improve matters, there is also the argument that the smaller homes proposed and the associated reduction in private space and gardens will not improve matters in the long term and could lead to a decline in well-being and health and a decrease in productivity.

A great deal of Private Finance will be needed but developers are likely to resist certain proposals which impact adversely on profits, and compromise will have to be made. I have no confidence that the best proposals of the plan (such as a) the proper phasing of infrastructure provision; b) Londoners being given an opportunity to purchase new homes before overseas marketing takes place) will remain, but believe they will be watered down or disappear. Londoners may well end up with the worst of the plan’s proposals and not benefit from the best.

### **INTRODUCING THE PLAN.**

**0.0.20** By indicating that the Plan may deviate from National Policy, the signal is that the Mayor of London is free to do as he/she pleases. This sends out a worrying message of unlimited power for London and is not, perhaps, the right signal to the rest of the country.

### **CHAPTER 1: PLANNING LONDON’S FUTURE (GOOD GROWTH POLICIES).**

**1.0.8** Rebalancing the housing market is a national problem. It requires a sea-change in developer attitudes to profit (as so much housing development depends on private finance); a revocation of right to buy and the imposition of rent controls.

**1.1.5** In my experience, “early engagement” with local people is a farce. Plans are put out for “consultation” but this is a tick box exercise and it is very rare for any notice to be taken of the views of locals.

**1.2.5** New and enhanced transport links will not be enjoyed by everyone. Even though I live in Inner London, I have no direct walkable access to the Underground, the DLR or the forthcoming Elizabeth Line which all require me to take a bus or train journey first. I depend on bus and train yet TfL is cutting services and the South East Trains franchise, which is up for renewal, proposes to stop all direct rail services to Charing Cross from my area.

### **CHAPTER 2: SPATIAL DEVELOPMENT PATTERNS.**

**2.0.3** Proposals for intensification in Outer London are of concern as there is an underlying threat (via small sites development) of garden grabbing.

**2.0.4** Infrastructure should definitely be planned in advance and provided on a properly-phased basis. However, all that is happening in my area is a rush to build homes to sell at market rates and a lack of commitment to provide other facilities.

**Policy SD6 Town centres. D** speaks of using town centres for older people's housing. This may provide access to shops etc but town centres are noisy and are supposed to increase their vibrancy and night time activity. Do not condemn older people to noisy locations.

### **CHAPTER 3: DESIGN.**

**Policy D2 Delivering good design. Design scrutiny. F Design Reviews:** to date these are a joke. In a nearby area a developer is being allowed to build 10 storey buildings despite the location not being approved for buildings of that height in the Local Plan.

**Policy D4 Housing quality and standards. 9 Private Outside space.** The standards are said to be minimum but developers like to squeeze the maximum number of units and profit out of their schemes. It is also unclear how these space standards relate to family homes. Would a 5 person dwelling really only be entitled to 8sqm i.e.5sqm (for 1-2 persons) + 1sqm for each additional person?

**10 Balconies.** These need to be genuine private amenity spaces and not, as so frequently now, so small as to be useful only to store a bicycle and a baby buggy. This is what you see in balconies of apartment blocks lining the train routes in to London.

**Table 3.1 - Minimum space standards for new dwellings.** I have looked at earlier standards and these new ones, which include storage space, are generally about 3 sq m less. The standards are niggardly and although they are presented as minimum standards, I have no confidence that developers will provide anything more. People are being crammed in.

**Policy D6 Optimising housing density 3)** The proper phasing of infrastructure provision **must** be tackled, so that existing residents do not suffer because new residents have arrived before facilities are there. Lack of proper infrastructure has the power to cause conflict and bad feeling between existing and new populations.

For example there is just one medical practice in my postcode and yet there are plans for thousands of homes. Although developer contributions are supposed to fund infrastructure such as GPs, my local authority is keeping very quiet about any discussions with its Clinical Commissioning Group aimed at improving GP numbers and access. This does not get people on side.

**3.6.3** The cumulative impact of development **must** be considered.

**Policy D8 Tall buildings.** In a nearby area a developer is being allowed to build 10 storey buildings despite the location not being approved for buildings of that height in the Local Plan. No one will explain why this has been allowed and local residents are extremely angry.

### **CHAPTER 4: HOUSING.**

**Policy H1 Increasing housing supply. 2c:** This seems to reverse much of what has happened in my local area. If recent retail development and associated car parks are to be redeveloped, then what has been built in the past three years has been a waste of money and we will be left with small shops and the need to travel outside the local area to shop. Not everyone will want/be able to access online shopping.

**4.1.6** Londoners **must** have an opportunity to purchase new homes before they are marketed overseas. Some developers in my area have targeted the overseas market specifically, resulting in a great deal of property speculation.

**Policy H2 Small sites C2).** Is this a stealth way of reclassifying gardens as brownfield? In my own area I have known tracts of residential garden to be left overgrown and then claimed as "vacant" when someone wanted to make a fast buck and build or sell on.

**D2 d)** with its mention of building “within the curtilage of a house” also looks as if it is targeting gardens which the government reclassified from “brownfield” (ie previously developed) to “greenfield” on 9 June 2012. There needs to be a much clearer explanation of the Small Sites proposals as even the Glossary definition of “previously developed land” introduces anomalies.

**Policy H7 Affordable housing tenure.** This specifies tenure split but not location split. In my own area there are developments where the social and affordable housing is confined to specific blocks or specific floors within blocks. This does not facilitate community integration.

#### **CHAPTER 5: SOCIAL INFRASTRUCTURE.**

Quality of life has the potential to maximize educational and skills attainment, improve health and increase productivity. It needs much more emphasis.

**Policy S2 Health and social care facilities.** If my own borough is undertaking discussions on these, they are not making anything public, hence the bad feeling about the level of development and what looks like a disregard of the concerns of existing residents (not just on their own account but for future residents).

#### **CHAPTER 7: HERITAGE AND CULTURE.**

##### **Policy HC6 Supporting the night-time economy**

**7.6.1** I fear that in the rush for employment and profit the needs of local residents will **not** be taken in to account.

#### **CHAPTER 8: GREEN INFRASTRUCTURE AND NATURAL ENVIRONMENT.**

**Policy G7 Trees and woodlands.** Please beef up the requirement for replanting and providing additional trees. Developers invariably classify existing trees on a site as “dead, diseased, dying” so they are able to remove them, but promised replacements are not made. One development near my home lost all its trees and when the promised replacements never appeared the developer then said that replanting would interfere with the utilities.

#### **CHAPTER 9: SUSTAINABLE INFRASTRUCTURE.**

**9.17.3** Does this mean that there will now be on-shore power for the Enderby Wharf Cruise Terminal?

#### **CHAPTER 10: TRANSPORT.**

Much of this chapter seems to be at odds with recent press reports over transport cuts.

**10.3.6** The bus network is seen as important but TfL revenues are decreasing and service cuts are already being made. Reduce the public transport and you increase private vehicle use. How is this going to help cut congestion and air pollution?

#### **CHAPTER 11: FUNDING THE LONDON PLAN.**

Private funding will be needed and developers are not going to like some of the proposals so will fight their corner and compromise will be necessary.

**11.1.60** Fiscal devolution of the type proposed would give far too much power to one person and his/her advisers.

Joy Brown.

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