

Tel: [REDACTED]

*From: Hubert Child*

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Sadiq Khan, The Mayor of London  
New London Plan,  
GLA City Hall,  
London Plan Team,  
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28.2.2018

Dear Mayor Khan,

The Draft London Plan 2018 – Consultation.

I write concerning three aspects in your London Plan which leave me in considerable doubt **and to which I therefore wish to object.**

(1)

**10 Year targets for housing completions**

**Chapter 4 H1, Tables 4.1 and 4.2.**

Merton's Housing Target is 1,328 new homes per annum for the next ten years (13,280 in total) including 671 per an annum on **small sites**. I strongly object to the 223% increase in the Borough's target and believe that it is unachievable.

In calculating the increase your team may have been wrongly influenced by two factors:

(a)

Paragraph 4.2.5 in H1 envisages incremental intensification of existing residential areas within 800 metres of a tube station, rail station or a town centre boundary. We understand that you have included tram stops in your count of tube stations. Tram stops consist simply of open air platforms beside the track and their small foot-print would be unlikely to provide a stable basis for extensive building above them, in the way you may intend for some tube stations.

(b)

A casual look at the map, would certainly give the impression that Merton has plenty of open spaces to spare, however this includes public parks, including the very major Wimbledon Common, Wimbledon Park, and Mitcham Common. These are valuable open land to which residents of many boroughs, including crowded inner London boroughs, come to walk and play.

Where I live, in Merton Park, much of the street pattern was laid out by the famous John Innes to form what he believed would be the first garden suburb. Our local parks and the size of residential gardens reflect this and form part of the intended character of the area (alongside the fine architecture).

Paragraph 4.2.7. in H1 states “Special attention will be required within Conservation Areas to ensure that increased housing provision is accommodated in a way that also compliments and enhances the area, taking into account conservation area character appraisals and management plans.” I would like you to add: “Characteristics of acknowledged importance to a Conservation Area should always be preserved.” Other Conservation Areas will have similar specific characteristics that need the protection of this additional sentence.

(2)

**D4 Housing Standards  
Private Internal Space**

Minimum room sizes envisaged in paragraphs 1-8 are pitifully small. They may be suitable for singles and for starter homes for young married couples but they would provide only cramped conditions for a growing family. That degree of cramping could well create health problems in families.

An additional paragraph after paragraph 8 is required.

“The above minimum room sizes should apply only in appropriate circumstances such as for single occupation or starter homes for young married couples. For family occupation Parker Morris standards should apply.”

(3)

**TALL BUILDINGS.**

**Policy D8 C.1.d**

I worry about implying that “Harm” could be acceptable in any location, not just regarding Heritage assets, and not just from tall buildings. It is never acceptable unless it can be demonstrated that it will be outweighed by a much greater measure of benefit. I suggest addition to the end of this paragraph as follows:

“This paragraph should not be taken to weaken the traditional planning criteria that developments should be refused where they cause harm to interests of acknowledged importance”..

Yours sincerely

*Hubert Child*