

## Mr Paul Dean comments

Page: [Policy H1 Increasing housing supply](#)

Section: [N/A](#)

The ten year targets for new housing in Table 4.1 are not fit-for-purpose. They are based on a top-down strategic assessment (the SHMA and SHLAA) of what may be possible to build and are not based on a detailed bottom-up assessment of what is really possible in practice. Given this they do not provide a fair or realistic basis for target setting to London Boroughs. It is clear these are not really intended as targets, but are more like " compulsory instructions to approve developments". This will force Boroughs' to approve new developments that are inappropriate and worsen the quality of life for London residents. Targets should be based on each Boroughs' own assessment of what is possible after a detailed assessment of actual development potential and site availability. This may be more time consuming to do, but is the only realistic way to prevent inappropriate and poor quality new developments.

Page: [Policy H2 Small sites](#)

Section: [N/A](#)

The draft London Plan fails to recognise that the existing planning system is already biased towards Developers and not London residents. Residents do not have a right of appeal against decisions of the Planning Inspectorate that are clearly wrong, without resorting to costly and complex Court action beyond the means of ordinary Londoners. The draft London Plan further increases the biase against London residents through the extensive use of "presumption in favour of development" in Policy H2 D.

The draft London Plan removes the existing presumption (under Policy 3.5) against inappropriate housing development in residential gardens. This will create problems, conflict and uncertainty for existing London residents and leave residents with no protection against inappropriate developments in gardens or against aggressive developers. Removal of the protection under policy 3.5, would be against Paragraph 53 of the Government's National Planning Framework, which asks local planning authorities to "resist inappropriate development of residential gardens". Removal of the presumption also fails to recognise the key role that residential gardens play in the quality of life of Londoners' and the vital role they play in promoting the green environment and bio-diversity of London. The draft London Plan is equally silent about the key role that Allotments play in the life of London. It seems the draft London Plan views them as just a source of housing land. Specifically, the presumption against inappropriate development in residential garden under Policy 3.5 should be added back to the draft Plan and strengthened to include allotments. Also, H2 D1-3 should specifically exclude residential gardens and related in-filling. It should be made clear in H2 D3 that "non-residential buildings" excludes residential garages, sheds and outbuildings in residential gardens. In H2 F, a new category should be added " 8) inappropriate development in residential gardens"

Table 4.2 needs to be based on a detailed bottom-up assessment from each London Borough for the reasons indicated in my comments on Table 4.1.

Page: [Policy G4 Local green and open space](#)

Section: N/A

The vital role that residential gardens and allotments play in local green space needs to be included in Policy G4. The removal of the presumption against inappropriate housing development in residential gardens under draft Policy H2 needs to be reversed. The new London Plan should include a new section that provides an assessment of the role that London's residential gardens play in improving the the quality of life for Londoners' plus the vital role they play in the green environment and bio-diversity of London. The role of Allotments need to be recognised too.