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**From:** Richard Ferraro [REDACTED]  
**Sent:** 02 March 2018 10:08  
**To:** Londonplan  
**Subject:** Consultation Response - Draft New London Plan

**Follow Up Flag:** Follow up  
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**To: Sadiq Khan, Mayor of London**  
The Greater London Council, City Hall  
The Queen's Walk, London SE1 2AA

**From: Richard Ferraro FRIBA FRSA**  
[REDACTED]

**Subject:** Consultation Response, Draft New London Plan

Dear Sir,

I am writing to object to the Draft New London Plan. I am an Architect with 40 years experience of Planning, Design and Conservation in London and elsewhere in the UK. I am familiar with National and Local Planning Policies, and how they are applied in detail. I am also familiar with the processes, checks and balances which are built into the Planning system.

With this background, I am alarmed by various aspects of the Draft New London Plan. For example, the proposed New Plan as drafted will significantly weaken the planning protection given to Conservation Areas. **In my view, that is very undesirable.**

There are three proposed policies in particular which I object to, see details below. In particular, I object here on the basis that these policies are inconsistent with National Planning Policy. As follows:

### 1.) Policy H2

This imposes a new "presumption in favour" of small-scale development of between 1 and 25 homes; including demolition and rebuild schemes, the upward extension of buildings containing flats, and residential extensions. This policy should **not** apply to Conservation Areas. Many Conservation Areas in London (and elsewhere) have suffered in recent years from aggressive commercial Planning Applications; frequently driven by aggressive commercial Planning Consultants. In such cases, and in ruthless pursuit of profit in higher value areas, developers seek to demolish existing properties in Conservation Areas, and rebuild them with inappropriate new housing at higher density. In many cases, these proposals are not in keeping with the principles and details of the Conservation Area Statements that apply.

In my professional experience, the volume and frequency of such planning applications has increased over the last 15 years. Inappropriate proposals of this type are ever more difficult for local communities to fight, where necessary, in order to defend the principles and positive character of Conservation Areas.

Weakening the protection given to Conservation Areas will lead to more of these aggressive and inappropriate planning applications being approved, destroying over time the special character that local communities rightly seek to preserve in Conservation Areas.

### 2.) Policy D8

This policy weakens existing policies on tall buildings, at a time when tall buildings are being pursued more aggressively by developers and their advisers; often inappropriately with regard to the context of the existing urban fabric and design context.

Tall buildings are completely inappropriate in many areas and locations. Further, I do not support the idea that tall buildings can be justified at any transport hub, simply through consideration of PTAL ratings.

As an example of inappropriate recent Planning Permission granted for a tall building, I look to the 24 storey residential tower at 100 Avenue Road, Swiss Cottage (in LB Camden). I objected strongly to the original Planning Application for that building, which was aggressively pursued by the site owner and developer, and a very aggressive Planning Consultant. Rightly in my opinion, Planning Permission was refused by Camden Council. The refusal went to Appeal, but was called in and approved by the Secretary of State. This particular development is completely out of keeping with the context of the area in which it is located. It also brings with it a variety of detrimental effects to local Conservation Areas. In my professional view, the 24 storey tower approved at 100 Avenue Road is a deeply inappropriate development at that location.

In summary, The London Plan should not be supporting an increase in tall buildings in London. Also, I know very well from my own experience as an Architect and designer of many new-build high density housing developments, that mid-rise development can deliver the same housing density as high-rise development. Tall buildings are mostly unnecessary, and they can bring great harm and detriment to a local area.

### **3.) Policy G3**

This applies to open spaces like Hampstead Heath, which is local to where I live, and which I have enjoyed for many years. In the past, many attempts have been made by developers to encroach on the Heath, most of which have been rightly re-buffed.

However, proposed Policy G3 will enable the boundaries of Metropolitan Open Land to be amended through “land swap” deals. In my view, that proposal is wholly inappropriate and will be exploited by commercial developers to the detriment of the wider community.

Hampstead Heath is one of the most important areas of open space in London and is a “green lung” at the heart of different local communities. These include communities of different ethnicities and communities living in all forms of housing; including public sector housing, like Palgrave House (owned by Camden Council), where I live.

The London Plan should not permit any changes or amendments to the boundaries of Metropolitan Open Land including Hampstead Heath.

### **In conclusion....**

Apart from the detailed points made above, the Draft New London Plan is inconsistent with national planning policy and should therefore not be approved. I do not agree that the Mayor and the GLA should consider it their right to depart from national policy. I strongly object to that, both in principle and in detail.

Of great importance in the Planning Process is the role that local communities have been given to shape their own communities (for example, through Neighborhood Plans). These rights must be fully respected. However, in my professional and personal opinion, the Draft New London Plan seriously oversteps the mark; it seeks to erode the rights of individuals and local communities, to defend their communities against inappropriate development.

In my view, the Draft New London Plan seeks to over-ride the reasonable preferences and rights of local communities in London. In addition to my detailed objections (as above), I also strongly object to this proposed erosion of rights.

Yours sincerely,

**Richard Ferraro FRIBA FRSA**

## Architect / Masterplanner

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