

# Mr David Harbott comments

Page: [Foreword](#)

Section: [N/A](#)

I must emphasise my concern regarding the totally inadequate communication of the New London Plan and the short consultation period.

- No communication has been received by any of our local households from the Mayor of London or the London Assembly. As 'one of the most crucial documents for our city' a mailing should have been sent to every residence.
- No communication has been received from our local authority (Enfield). There would have been an opportunity to have featured the consultation in the 'Our Enfield' magazine, distributed quarterly to residents. However the December issue was presumably finalised before the London Plan was published on 29th November 2017, and the February issue, just received, is also totally silent on the London Plan.
- Residents in Hadley Wood no longer receive copies of free local papers, so even if the consultation was mentioned in the press, the local community would still not have been informed.
- At over 500 pages long, and with important references to supplementary analysis and policies, the plan is beyond the reach of all but a very small minority of Londoners to read, understand and to respond to. The plan needs to be supported by a clear and concise summary, with sections tailored to different local communities where the impacts will vary, explaining 'what it means for you'. I have not found such a summary document.
- Even with perfect communication, a three month consultation period is inadequate for a document of this size and complexity. Given that the first consultation month was December where preparations for the Christmas festivities dominate everyone's lives, the effective consultation period is only 2 months.

The introduction to the plan states that it will change London and will set planning strategy for the next 20-25 years. Londoners deserve the right to an effective consultation; this has not happened. A communication strategy to inform every household and an extended consultation period are both absolutely essential.

Page: [Chapter 1 Planning London's Future \(Good Growth Policies\)](#)

Section: [N/A](#)

with respect to the content of the plan, I welcome many of aspirational statements in the London Plan, particularly the Mayor's commitments to the environment, to good design, to accessibility, and his statement that 'good growth is not about supporting growth at any cost'. I also recognise the real need to increase the supply of housing across London and we support sympathetic and sustainable growth.

However I have grave reservations that proposed policies in the draft London Plan are in some cases logically inconsistent, and do not adequately balance the need for development with critical factors including accessibility, protection of the environment, preservation of character, and the availability of local services.

This response is primarily focussed on 'small sites' and the 'presumption in favour'. There is no consideration in the plan of the cumulative impact of developing very many small sites on accessibility, environment, character and services. This is a huge omission, given that the plan includes net housing completion targets of almost a quarter of a million homes on small sites, and in some suburban boroughs this is 78% of the total target.

Allocation of small sites and presumption in favour must be subject to appropriate reviews of accessibility, local services, and local environmental issues including flood risk and tree cover.

Page: [Policy GG2 Making the best use of land](#)

Section: [N/A](#)

1. Paragraph 1.2.3 infers that appropriate locations are 'places where local amenities are within walking and cycling distance, and public transport options are available for longer trips'. However Policy D6 'Optimising Housing Density' states in paragraph 3.6.2 'It will not be normally necessary for minor developments to undertake infrastructure assessments or for boroughs to refuse them on the grounds of infrastructure capacity'. This could lead to the construction of a quarter of a million new homes on incremental small sites without any infrastructure assessment. **The cumulative impact of increasing density and small site development must be covered by additional robust and definable policies that assess both local amenities and accessibility. Presumption in favour should only apply for small sites and increasing density in places where there are adequate local amenities.**

Page: [Policy D6 Optimising housing density](#)

Section: [N/A](#)

Policy D6 para 3.6.1 suggests that housing density can be increased without the need for an infrastructure assessment.

Our suburban location has no NHS GP surgery, no NHS dentist, no bank, building society or post office, no secondary school, an over-subscribed primary school, no direct public transport access to the nearest hospitals, a single 'corner-shop' convenience store, no public house, and is in PTAL zones 0, 1a & 1b (but it does have a train station with a very limited service).

Additional development in our community, and similar suburban areas, increases car use and negatively impacts congestion and air quality, in contravention with other plan policies.

**The cumulative impact of increasing housing density on local services must be supported by an infrastructure assessment.**

Page: [Policy H2 Small sites](#)

Section: [N/A](#)

What are a reasonable 'set of local amenities' to define an 'appropriate location' in 1.2.3?

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Additional development in our community, and similar suburban areas, increases car use and negatively impacts congestion and air quality, in contravention with other plan policies.

**A definition is required of the minimum set of local amenities necessary for presumption in favour of approval for small sites to be appropriate.**

Page: [Policy H2 Small sites](#)

Section: [N/A](#)

1. Paragraph 1.2.4 talks of 'directing growth to the most accessible and well-connected places', whereas;

Policy H2 Small Sites, includes 'presumption in favour' for 'underused sites' and 'infill development within the curtilage of a house', without any reference to the level of public transport.

Given that nearly 40% of new homes across London are planned to be on small sites (and up to 78% in some outer London Boroughs), there is a clear conflict between these statements.

**Presumption in favour should only apply for small sites in the most accessible and well-connected places.**

Page: [Policy H2 Small sites](#)

Section: [N/A](#)

Not all Small Sites are 'appropriate locations' and 'the most accessible and well-connected places'?

Several policies quote 'public transport access levels (PTALs) 3-6 OR located within 800m of a Tube station, rail station or town centre boundary' as the definition of accessibility.

Therefore a rail station with 3 trains per hour, no regular bus service, and in PTAL 1b, is treated for planning purposes in exactly the same way as a Tube station with 20 trains per hour and good bus inter-connectivity in PTAL 6b.

This is totally unrealistic, and if unchanged, would lead to development in areas without adequate public transport, resulting in an increase in car use; an unintended consequence of poorly worded policies and in direct conflict with the 'Mayor's target for 80% of all journeys to be made by walking, cycling and public transport'.

Appropriate locations should be more appropriately defined, for example as '**public transport access levels (PTALs) 3-6 AND located within 800m walking distance of a Tube station, rail station or town centre boundary**'.

Page: [Policy G7 Trees and woodlands](#)

Section: [N/A](#)

Policy G7 C states 'development proposals should ensure that, wherever possible, existing trees of quality are retained'.

This is a totally inadequate policy without effective power. Trees of quality is a matter of opinion, not fact. 'Should' and 'whenever possible' are open statements. Garden trees play a critical role in London's environment, improving air quality, absorbing rainfall and mitigating flooding, increasing biodiversity, provide shade, and form a critical part of the local character. The policy as drafted will result in hundreds of thousands (possibly millions) of trees being lost. Real experience of garden development in suburban areas has demonstrated that the majority of existing vegetation on site is lost during construction; a recent application in Enfield for 3 new houses would remove over 100 trees and shrubs. Stronger, mandatory tree protection policies are required. Otherwise the London Plan will not meet it's environmental targets such as 'delivering 50% green cover across London' and to 'increase tree cover by 50%'.

Page: [Policy SI12 Flood risk management](#)

Section: [N/A](#)

Policy SI12 C only covers development proposals that need a specific flood risk assessment. The majority of small sites do not merit a specific flood risk assessment. However the CUMULATIVE impact of small site development has, based upon real experience, resulted in surface water flooding, waterlogging of neighbouring sites, and increased fluvial flood risk to local water courses.

New flood risk policies are required to cover the cumulative impact of the massive scale of small site development proposed in the New London Plan.