

2nd March 2018

Email: londonplan@london.gov.uk

Dear Sirs

With regards to your proposals in the New London Plan I would like to comment on the following issues.

The removal of protection for back gardens.

The existing policy 3.5 has been successful in protecting much garden land from development. It would therefore be a backwards step in London's development as a City for people to live in and want to live in to remove that protection. The loss of back gardens has a huge impact on biodiversity and local character and flies in the face of the NPPF. This is especially true in the outer London suburbs, where many people have moved specifically because there is a higher level of greenery and back gardens to family homes whilst retaining reasonable (though not as good as) transport links into central London. Outer London is very different in nature to central London and this should be recognised with continued back garden protection.

Policy 3.5 should, therefore, be reinstated to maintain the current level of protection for back gardens.

The removal of the density matrix, which sets limits on housing density.

The density matrix should be re-instated to ensure that new development suits local character and is at an appropriate level for the surrounding area.

The vague guidance that is now being proposed will allow developers to have free rein in the development of sites, without reference to character or suitability. As was referred to above, outer London is different to the centre and high densities in all but the main town centres (such as Croydon town centre) should be capped.

The removal of targets for family homes.

The New London Plan fails to make sufficient provision for new family homes of three and four bedrooms. This is especially concerning in the context of the removal of the 36% family homes target from the draft Housing Strategy. This will result in there being no policy to encourage family homes.

It is vitally important that there is a target for family homes, otherwise developers will be tempted to predominantly build smaller units that are cheaper and do not provide for communities of tomorrow, as is already happening, leading to an over development of one and two-bedroom flats and a shortage of family sized homes (ideally actual house but family sized is the key requirement).

The SHMA methodology should be reviewed to ensure that the correct quantities of family housing are being provided. Furthermore, policies that promote two-bedroom units as family housing and the use of space standards as a maximum should be resisted, otherwise there will be a dramatic reduction in the production of family homes which will ultimately lead to poor living conditions for future families.

A reduction in parking standards and the insistence that new developments near transport hubs should have zero parking provision.

Policy T6 should be removed as it is impractical to make many types of new development car free, especially where a station or transport hub is not in a major town centre. We are already seeing an exponential increase in on street parking that is causing huge problems in many suburban areas. People will continue to own cars, but they will be forced to park them elsewhere, causing resentment within existing communities. The recent years fad for limited car ownership in developments is a false economy that causes wider problems than it solves through failure to recognise the reality of humans living in urban or suburban areas.

The targets within the current London Plan are already stringent and should be left in place and not tinkered with.

An increase in housing targets.

The newly proposed annualised housing target of 64,935 homes per year across London, has led to a dramatic increase in the 10 year housing targets. Croydon's 10-year target has been increased from 14,348 to 29,490. In comparison Bromley (a physically much larger borough with a comparable population size) have been increased from 6,413 to 14,240 and Sutton from 3,626 to 9,390. Croydon have just had their housing targets assessed as part of the examination in public of the Croydon Local Plan. These targets have been subject to the latest scrutiny and found to be sound by the Planning Inspector. These are the targets that should, therefore, be incorporated in to the New London Plan.

Croydon has also been achieving challenging targets in housing supply for many years now. The availability of brownfield sites is becoming much more difficult. Other boroughs have not produced anywhere near the same quantity of housing as Croydon, and perhaps it is time for those boroughs to step up to the plate.

The methodology behind the SHMA appears to be unsound and should be re-examined to ensure that appropriate targets are being set.

In conclusion, I would urge the GLA to re-consider the policy areas that have been outlined, otherwise the proposed policy changes will severely negatively impact upon Croydon (as well as many other parts of London) and encourage the loss of existing family housing and its replacement with blocks of flats with little or no parking provision, causing a huge impact in existing character.

Yours faithfully,

Simon Hoar
Resident of London Borough of Croydon