

Mr Geoffrey Lean comments

Page: [Policy D13 Noise](#)

Section: [N/A](#)

This policy needs to make specific provision for reducing traffic noise in parks and open spaces; a third of parks are severely impacted by them.

There should also be provision for closing streets at weekend and at night to combat noise, a threat to health only second to air pollution.

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

Section: [N/A](#)

This policy is greatly to be welcomed both for its planned increase in much-needed housing, and for its focus on redeveloping brownfield land and on the need for councils proactively to use brownfield registers proactively and give planning permission in principle. Concentrating development on brownfield land is not only important in preserving green space, but it also takes advantage of existing infrastructure, and provides homes where people - and particularly the young - want to live.

Page: [Policy G2 London's Green Belt](#)

Section: [N/A](#)

This approach to the Green Belt is enormously welcome, including its acknowledgement of permanence as an essential characteristic, and the understanding that the poor quality of some if it is a reason to enhance it and not -as so many argue - to develop it.

It is extremely important that Policy G2 clearly stipulates that de-designation of the Green Belt will not be supported, while enhancement will. However, given the rapidly multiplying threats to the Metropolitan Green Belt, the policy should state that a presumption against its loss will be vigorously enforced.

The policy also contrasts with a much more cavalier attitude to the Green Belt in some local authorities outside London. Tandridge and Guildford, for example, are both promoting major developments in it - in Tandridge's case effectively a new town (dubbed a garden village) that would set an appalling precedent for the Metropolitan Green Belt as a whole. London should engage with such authorities to try to persuade them to adopt a similar approach to the one in this Plan: otherwise the effect of its own policies will be much reduced by increasing Green Belt development once its boundary is crossed.

Page: [Policy G3 Metropolitan Open Land](#)

Section: [N/A](#)

Policy G3 is generally to be supported, but policy G3C with its provision to allow land swaps gravely undermines it and should be deleted.

Page: [Policy G5 Urban greening](#)

Section: [N/A](#)

These measures are to be welcomed - as is the Mayor's target for greening London - but there should be specific provision for all new developments to provide adequate green space.

Page: [Policy SI1 Improving air quality](#)

Section: [N/A](#)

London's air quality is a scandal, as is the repeated failure of previous administrations - national and city - to address it with anything like sufficient measures. This policy is a significant improvement on previous ones, but still is not likely to go far enough. So serious is the situation that, for example, there should be a requirement, not just an aim, for all new developments to be Air Quality Positive.

Page: [Policy SI11 Hydraulic fracturing \(fracking\)](#)

Section: [N/A](#)

Any proposal to frack under London would be simply ludicrous and should receive short shrift. There is no evidence that there are the gas or oil resources to be fracked. And if there were, fracking would absorb much needed water supplies and risk contamination, and would increase supplies of fossil fuels, and thus carbon dioxide emissions.

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

Section: [N/A](#)

Flooding is an enormously serious issue, and these policies do not go far enough. There should be a presumption against building on flood prone land, as the NPPF lays down, and its Sequential test should be strictly applied. Mitigation will not be sufficient.

Page: [Policy SI13 Sustainable drainage](#)

Section: [N/A](#)

It is important, as policy S1 12 lays down, that run-off is managed as close to its source as possible, that impermeable paving be banned (indeed a start could be made by enforcing existing provisions for front gardens, and extending them throughout properties) and appropriate SUDS used in all circumstances.

Page: [Policy T2 Healthy streets](#)

Section: [N/A](#)

Air quality is hardly addressed here at all, though it is by far the greatest threat to health arising from London's streets. There has to be an unprecedented crackdown on pollution from road transport and, in particular, diesel vehicles, which should be phased out altogether.

Page: [Policy T6.1 Residential parking](#)

Section: [N/A](#)

These parking allowances are too generous and thus conflict with policies to reduce congestion and air pollution and increase walking, cycling and the use of public transport. The maximum should be reduced to 0.3 spaces per unit in all areas as a powerful measure to help achieve the Mayor's objective of delivering 80 per cent of journeys by foot, cycle, or public transport by 2041.

Page: [Policy T6.5 Non-residential disabled persons parking](#)

Section: [N/A](#)

These provisions for disabled persons are to be welcomed, but they need to be enforced. There should also be adequate disabled parking in residential areas for visitors, especially in large developments.