

Mr Peter Martin comments

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

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The excessively high housing targets proposed in the Policy H1 and Table 4.1 puts at risk all green space designations. It is unlikely that the high targets will be achieved in Outer London and very soon into the lifetime of the plan developers will be using the shortfall to support their case for development in the Green Belt, MOL and on other protected open space. For 'Good Growth' to occur, the policy should explicitly state that protected open designations will not be allowed to be overridden by the need to achieve dwellings targets.

Page: [Policy GG4 Delivering the homes Londoners need](#)

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London simply does not have the capacity to deliver all the needs identified in the 2017 London SHMA. If housing were to be delivered on anything like the scale envisaged in the Plan then what would emerge is not '...a housing market that works better for all Londoners' but a developer's free for all with unplanned uncoordinated development taking place wherever the market deems it viable to assemble sites. Establishing '...ambitious and achievable build-out rates at the planning stage' and 'incentivising build-out milestones' just encourages developers to override other considerations such as open space protection, heritage and local character in favour of achieving housing targets.

Page: [Chapter 2 Spatial Development Patterns](#)

Section: [N/A](#)

The scale of intensification envisaged in the suburbs will be seriously detrimental to local communities, heritage, character and green space. The distinctive character and heritage of these areas is at risk from overdevelopment.

Page: [Introduction to Chapter 2](#)

Section: [2.0.3](#)

The scope for 'appropriate intensification' in the suburbs has been over estimated.

Page: [Policy D4 Housing quality and standards](#)

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The presumption in the current London Plan (Policy 3.5) against the development of back gardens and other private residential open space has been lost with this policy. The development of garden space will have have a profound impact on the character and appearance of suburban outer London and gives rise to implications for open air play space. It also runs counter to the idea of 'urban greening' espoused in Policy G5

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

Section: [Table 4.1](#)

The housing targets set out in Table 4.1 are far too high for suburban areas such as Bromley. The targets are unrealistic and unachievable insofar as they do not take account of the character of existing established suburban areas or the designated 'Areas of Special Residential Character' in many Borough's Local Plans.

The result will be sporadic development by some developers able to assemble sites in suburban areas and who take advantage of the high targets. There is likely to be an early shortfall in the target as sites will be difficult to assemble in sufficient number. This opens the way for developers to put forward their sites in the Green Belt, MOL or other protected open space as a means of meeting the supposed shortfall. Too high a target puts the Green Belt, MOL or other protected open space at risk.

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

Section: [4.1.7](#)

The 2017 SHLAA makes unrealistic assumptions about the scope for 'densification' in suburban areas. The result will be sporadic unplanned development and a spoiling of the character of established suburban residential areas.

In the London Borough of Bromley, for example, if development on this scale were to occur, there would be a fundamental change in the character of the Borough from one of family houses with gardens to one of mainly flatted developments. The small sites target in the 2017 SHLAA appears to have been a desktop exercise carried out without any local knowledge or appreciation of local circumstances. There was no local participation and the result is an unrealistic and unachievable target that will have long term implications for the character of suburban streets and, in due course, will threaten Green Belt, MOL and other green space designations. The SHLAA should be a realistic assessment of capacity and not inflated in order to achieve a target. As such it will give the spur to unco-ordinated development throughout the Borough that will be seriously detrimental to suburban communities, heritage and local character.

Page: [Policy H2 Small sites](#)

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The policy on small sites does not recognise the quality of some of the suburban streets, roads and avenues that lie close to town centres and within the 800 metre radius proposed in the policy. In particular, no recognition is given to the 'Areas of Special Residential Character' that exist in many Borough's Local Plans.

Page: [Policy H2 Small sites](#)

Section: [Table 4.2](#)

The targets set out in Table 4.2 are far too high. In particular, for suburban areas such as Bromley, they are likely to spoil the special suburban character of many streets and roads near to town centres or nodes of public transport. Further more, it is very unlikely they will be achieved due to the diversity of ownerships in suburban areas and the difficulty of assembling suitable sites. Too high a target will put the Green Belt and MOL at risk.

Page: [Policy G1 Green infrastructure](#)

Section: [G1](#)

There's no mention of gardens and other private residential open space in this Policy. The implication is that these will be lost in the process of 'densification' of the suburbs espoused in other parts of the Plan. Back gardens should be recognised as being a vital part of London's Green Infrastructure.

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

Section: [G2](#)

It should be recognised that an excessively high and unrealistic housing target for Outer London will put the Green Belt at risk

Experience has shown that where there is a shortfall in the housing target Boroughs are vulnerable at appeal to the argument put forward by developers that their Green Belt sites have to be released. The unrealistic targets in Table 4.1 mean that there will be a shortfall occurring in many parts of London at an early stage in the Plan period.

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

Section: [G3](#)

It should be recognised that an excessively high and unrealistic housing target for Outer London will put Metropolitan Open Land at risk

Experience has shown that where there is a shortfall in the housing target Boroughs are vulnerable at appeal to the argument that MOL sites have to be released. The unrealistic targets in Table 4.1 mean that there will be a shortfall occurring in many parts of London at an early stage of the Plan.

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

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Back gardens and other private residential gardens should be recognised as an important and vital component of London's green infrastructure, particularly in suburban areas.

Furthermore it should be recognised that excessively high and unrealistic housing targets for Outer London puts all protected open space designations, including local green space, at risk.

Experience has shown how when there is a shortfall in the housing target Boroughs are vulnerable to the argument at appeal that privately owned protected open space must be released. There is likely to be an early shortfall in the targets in many parts of London thus leaving many protected open spaces at risk of development.