

## Jinder Ubhi

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**From:** Alan Simpson [REDACTED]  
**Sent:** 27 February 2018 19:30  
**To:** Londonplan  
**Subject:** Draft London Plan consultation

**I am writing to respond to the draft London Plan consultation. I am pleased that the draft recognises the importance of green spaces but policies need to be stronger to give them adequate protection, in particular:**

- Protecting the Green Belt requires stronger enforcement.
- It should not be possible to 'swap' designated Metropolitan Open Land.
- Private and public gardens should be protected alongside other local green and open spaces.
- Policies and funding are needed to improve the quality of green space by reducing noise, light and air pollution, increasing biodiversity, and by giving stronger protection to mature trees and hedgerows.
- Informal and formal outdoor sports facilities, including for ball sports, should be protected and enhanced.
- A more strict approach is needed to reduce reliance on the private car, including reduced parking provision in new developments and promotion of more sustainable transport modes.

- Excessive housing densities in new development should be resisted to protect the local character of London's neighbourhoods.

I welcome Policy G2 and particularly the proposal in Policy G2B that 'de-designation' of Green Belt will not be supported. This policy needs to be reinforced for it to be effective. **Proposed change:** A presumption against the alteration of Green Belt boundaries which reduce its extent should be included in policy G2B so that it reads: **'The extension of the Green Belt will be supported and its de-designation will not. We will enforce a presumption against the loss of Green Belt'**.

I welcome recognition that Metropolitan Open Land (MOL) should be protected from inappropriate development but this policy is undermined by Policy G3 C and the provision to allow 'land swaps' because MOL is characterised by its 'permanence'. **Proposed changes:** Policy G3 C should be deleted along with the sentence in paragraph 8.3.2 "The principle of land swaps could be applied to MOL where the resulting MOL meets at least one of the criteria set out in part D of this policy". Policy G3B should be amended to read: **'The extension of MOL designations should be undertaken through the Local Plan process, in consultation with the Mayor and adjoining boroughs.'**

I am concerned that Policy G4 contains insufficient recognition of the contribution of private gardens to the extent of green space. A policy is needed to prevent extensive 'garden grabbing'. **Proposed change:** Policy G4 A should be revised to include reference to private gardens to read: **'Local green and open spaces, including public and private gardens, should be protected'**.

I welcome support for the creation of new areas of accessible green and open space. These provisions should be strengthened by requiring measures in Policy G4 to improve the quality of green space.

**Proposed change**

- **Policy G4 C – should read “Assessments should identify areas of public green and open space deficiency, including an assessment of deficiency in quality, taking account of Green Flag criteria, noise and air pollution, and using the categorisation set out in Table 8.1 as a benchmark for all the different types required.”**
- Policy G4 E 1) should include at the end **‘including an assessment of, and where appropriate a plan, to improve the quality of the space’**.

The policy on noise should make explicit reference to the need to reduce the impacts of noise on green space, and other relevant policies amended accordingly. **Proposed change:** Additions should be made to Policy D13 Noise as follows:

- Para B: Boroughs [etc] should identify and nominate new Quiet Areas and protect existing Quiet Areas in line with the procedure in Defra’s Noise Action Plan for Agglomerations **and ensure local green space is improved in line with Policy G4 (as amended) including by:**
- **taking action to reduce traffic noise around parks which are severely impacted by traffic noise and pollution, using such measures as temporary/weekend street closures and/or permanent re-routing of traffic; or introducing natural or man-made noise barriers.**

The provision and improvement of green space requires funding to help deliver the Mayor’s aspirations for ‘good growth’ and increasing London’s green cover and should be addressed in Policy DF1. **Proposed change:** Policy DF1 D (2) should be amended to read as follows: ‘Recognise the importance of affordable workspace and culture and leisure facilities, **including public green and open space**, in delivering good growth.’

The ‘Urban Greening Factor’ outlined in Policy G5 does not address the human use of green space and overlooks qualitative considerations and a wealth of knowledge about how people use green spaces and how design can enhance their

experience. **Proposed change:** Policy G5 – a further sub-section should be added as follows: **(C) Urban greening required and delivered in new developments will be additional to requirements to provide adequate green and open space as set out in G4. New developments must allow for provision of new green and open space in addition to meeting urban greening requirements.**

The approach to biodiversity and access to nature outlined in Policy G6 needs to be strengthened to avoid the loss of valuable habitats and wildlife. **Proposed change:** Policy G6 – The second sentence in sub-section A of this policy should be deleted, along with the whole of sub-section C. The following sentence should be added at the start of sub-section D **‘All new development should seek to achieve a net gain in biodiversity.’**

Mature trees are a vital part of London’s green infrastructure and there should be strict controls over felling them in Policy G7, along with recognition of the importance of established hedgerows. **Proposed changes:**

The value of hedgerows should be recognised in subsection B 1) of Policy 7 by amending it to ‘protect ‘veteran’ trees, **mature hedgerows** and ancient woodland,,,’. The first sentence of Policy G7(C) should be amended so it reads as follows: “Development proposals should ensure that existing trees of quality, **mature trees and hedgerows, and trees of value in terms of delivering ecosystem services such as water or air quality management,** are retained.

Policy SD1 on Opportunity Areas should require sufficient space for the amenities usually provided by parks, in particular playing fields and courts for open air sport. **Proposed change:** Policy SD1 B(3) should be amended to read ‘plan for and provide the necessary social and other infrastructure to sustain growth, working with infrastructure providers where necessary, **and ensuring open and green space is planned to accommodate informal and formal outdoor sports.**

A decline in the quality of use of sports facilities is often used as an excuse for allowing development of public open spaces which needs

to be addressed in policy S5. **Proposed change:** S5 B(4) This should be amended to read: “ensure that there is no net loss of facilities. **If there is evidence that ongoing or future demand for sports means facilities are under-used measures should be taken to ensure demand is promoted through a local sports strategy or to repurpose the space for an outdoor sport for which there is demand.**”

The plan seeks to further restrict car parking in new development and to reframe the link to PTAL. Allowing excessive car parking in Policy T4 is inconsistent with the main transport policies which seek to reduce car trips. **Proposed changes:**

- The following amendments should be made to Policy T4(C) – ‘Where appropriate’ should be deleted and Policy T4(D) should be changed to read “..planning permission ~~may~~ **will** be contingent on the provision of necessary public transport and active travel infrastructure.”
- Table 10.3 - The bottom four rows should be amended so that the maximum parking provision in a development in any area (whatever the PTAL) is 0.3 spaces per unit.
- Paragraph 10.4.4 – the word ‘Ideally’ should be deleted and the sentence reworded as follows: “~~Ideally~~ New development **of all sizes, but in particular** that **which** will give rise to significant numbers of new trips, should be located in places well-connected with public transport...”
- Policy T6 H: should be amended to read “Boroughs wishing to adopt borough-wide or other area-based car-free policies will be supported. *[Delete the outer London caveat sentences.]* Minimum standards are not appropriate for **residential or** non-residential land uses in any part of London.”

We welcome the overarching policy GG2 concerning making the best use of land. This should be strengthened by reference in policy H1 to making use of excessive or redundant road space.

**Proposed change:** Policy H1 B2d) should be amended to include reference to excessive or redundant road space and other car-related

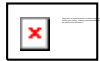
infrastructure so that it reads **‘the redevelopment of surplus utilities and public sector owned sites, including excessive or redundant road space.’**

We broadly welcome policies D1 to D6 in the draft London Plan which seek to improve the design and land use efficiency of new housing. We believe policy D6 concerning the optimisation of housing density needs to be amended to avoid a lack of associated public infrastructure, and excessive housing densities and ‘town cramming’.. **Proposed changes:** The phrase ‘in exceptional circumstances’ should be deleted from the last sentence in Policy D6B 3) so that it reads **‘This may mean that development is contingent on the provision of necessary infrastructure and public transport services...’**. The density levels specified in Policy D6C should be amended to 80, 170 and 260 units per hectare respectively so that it reads: **‘ 1) 80 units per hectare in areas of PTAL 0-1; or 2) 170 units per hectare in areas of PTAL 2 to 3; or 3) 260 units per hectare in areas of PTAL 4 to 6’**.

The draft Plan gives insufficient consideration to the protection and enhancement of London’s diverse local character. Policies D1 and HC1 need to be amended to ensure that greater attention is given to the character map of London, and community or neighbourhood plans, in planning and designing new development. **Proposed changes:** The first sentence of Policy D1 ‘London’s form and characteristics’ should be amended to make specific reference to neighbourhood and community plans so that it reads **‘Development Plans, area-based strategies, neighbourhood and community plans. and development proposals should address the following:’** The phrase **‘reflect and enhance local character and distinctiveness’** should be added to the list after 1) in Policy D1A.

The first sentence of Policy HC1 ‘Heritage conservation and growth’ should be revised so that it reads: **‘Boroughs should, in consultation with Historic England, other relevant statutory organisations and local community and neighbourhood planning groups, develop evidence that demonstrates a clear understanding of London’s historic environment, local character and distinctiveness.’**

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