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Dear London Plan Team

This response is on behalf of myself as a Londoner living in several North London locations for nearly 50 years, moving from a central flat (██████████) via inner suburb (Finchley Central) and with family to outer rural suburb (██████████ in Enfield Borough near Barnet).

I also give this response on behalf of HWCASG (Conservation Area Study Group) which I lead along with Lewis Temple. I am a trustee of the HWA Association and a member of our Neighbourhood Planning Forum and fully endorse the response of David Harbott on behalf of those bodies (see below).

Together we represent the community of Hadley Wood with experience of the planning process, seeking a balance between accommodating sympathetic and sustainable development and preserving the essential features of our important heritage location as recognised in local and national planning policies.

The purpose of our responses is to show why some important changes are needed in the draft London Plan (DLP) to preserve the fair and necessary balance between development and existing use. Although we feel HW is special, we are sure that the potential impact of the DLP on our community will also be reflected in many other communities.

POOR CONSULTATION

Before emphasising some specific points from the HWA Response (below), I wish to highlight the truly dreadful failure to communicate and allow proper opportunity to consult on such a critical document.

The Mayor says that communities are at the heart of the DLP. As such, it must be right that he ensures the opportunity to respond in consultation - and build the partnership he is looking for.

Please extend the consultation period, with good presentation of key issues.

CONSERVATION AREAS

Current planning laws give real importance to heritage assets. The DLP only has aspirational remarks, but these are outweighed by presumptions in favour of development of small sites. The HWCA is the core feature of HW, a uniform development round a small station. It is suburban with gardens and trees. It is entirely within 800m of the Station. The DLP must make it clear that the small site planning presumptions do not override CA Protection, which should be in line with Listed Buildings.

NEIGHBOURHOOD PLANS

These plans are the best reflection of community views. Rather than being overridden by the DLP, they should be given paramount importance within Design Codes and Local Plans - subject of course to compliance with the DLP itself.

CUMULATIVE DEVELOPMENT

The presumption for development for small sites, defined as up to 25 households (which even one would constitute a dominant development in our community), must be subject to a clear provision to protect against cumulative development (including recent development).

We have experienced major flooding problems from cumulative small developments. We are at a tipping point to lose our suburban character through excessive garden infill and loss of trees.

Please review the balance of factors in the light of these considerations.

Thank you

Robert Wilson
HWA, HWNPF and HWCASG.

Sent from my iPhone

Begin forwarded message:

From: "David Harbott IMAP" <[REDACTED]>
Date: 2 March 2018 at 14:56:47 GMT
To: "Robert Wilson" [REDACTED]
Subject: FW: Draft New London Plan

Dear London Plan Team,

This response is on behalf of the Hadley Wood Association and the Hadley Wood Neighbourhood Planning Forum. Before we comment on the content of the plan, we must raise serious concerns about the total lack of communication about the New London Plan and the public consultation.

- 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 size and complexity of the Plan documentation are too daunting for most people. 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.

We believe that a new communication strategy to inform every household and an extended consultation period are absolutely essential.

Moving on to the content of the plan, we 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'. We also recognise the real need to increase the supply of housing across London and we support sympathetic and sustainable growth.

However we 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.

Our responses are 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.

Our responses are also informed by many years' actual experience of the intensification of land use in our own locality of Hadley Wood, a suburban village of around 1000 households, which historically grew up around a local station with an important Conservation Area core, but with very restricted public transport and very limited local facilities. The cumulative impact of numerous recent small scale developments in rear and side gardens has already resulted in surface water flooding incidents, an increase in car journeys and congestion, and detrimental changes to the character of the area, which, according to independent planning professionals, has reached a 'tipping point'. We have used this real experience to 'test' the logic of the draft policies, not because of any special case for Hadley Wood, but because the lessons are applicable across London, particularly in suburban communities.

Please see below a number of specific policy examples that demonstrate the inadequate balance between development, accessibility, the environment and character.

1. Chapter 1, 'Making the Best Use of Land' includes a number of overarching and aspirational statements that appear reasonable. However, some of the detailed policies later in the plan are inconsistent with these statements. For example;
 - a. 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.
 - b. 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.

2. Many terms used in the Plan are ambiguous and inadequately defined.
 - a. For example, what are ‘underused sites’ referenced in H2? A garden may be an important local amenity for wildlife, mature trees and local drainage. Just because it has not been built on it does not mean it is underused.
 - b. Similarly, what 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 suburb like ours, with a rail station but a very limited rail service of currently only 3 trains per hour, no regular bus service, and a maximum PTAL of only 1b, would be treated for planning purposes in exactly the same way as a location served by 20 tube 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’.**
 - c. And what are a reasonable ‘set of local amenities’ to define an ‘appropriate location’ in 1.2.3?

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.

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 to be appropriate.
3. There is a lack of balance between the policies about Land Use, Housing Density, Housing Supply and Small Sites and the Environmental Policies that cover Urban Greening, Trees, Air Quality, Flood Risk and Sustainable Drainage.
 - a. For example, we can find no explanation of how ‘presumption in favour’ will be weighted in a planning decision in comparison to, for example, loss of a significant number of mature trees or a risk of surface water flooding. Recent experience of planning decisions would suggest that too little weight is given to Environmental Issues, and this will be perpetuated by the current wording in the London Plan, with statements such as;

‘Development proposals should ensure that, wherever possible, existing trees of quality are retained’ (G7 C).

‘Development proposals should aim to achieve greenfield run-off rates ...’ (SI13 B).

Stronger, mandatory tree protection policies, are required, if the London Plan is to meet environmental targets such as ‘delivering 50% green cover across London’ and ‘to increase tree cover in London by 10%’.

These are equally important in addressing flood risk (see b below).

- b. Policy SI12 Flood Risk Management, states that ‘Development proposals which require specific flood risk proposals should ensure that flood risk is minimised and mitigated, and that residual risk is addressed’.

Based upon current policies, the majority of small sites do not require 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 small site development.

4. Character of the Area & Design Codes, Conservation Areas and Neighbourhood Plans Policy H2 Small Sites, states that ‘presumption in favour means approving small housing developments which are in accordance with a design code’.

Although the London Plan Team intend to produce guidelines for the preparation of ‘design codes’, these will not be available before the end of the consultation period. It is therefore impossible to assess how effective they may be in protecting elements of the character of the area that are important to local residents.

In addition, ‘where there is no such design code, the presumption means approving small housing development unless it can be demonstrated that the development would give rise to an unacceptable level of harm to residential privacy, designated heritage assets, biodiversity or a safeguarded land use ...’.

These criteria are both difficult to measure and not comprehensive. They do not reference harm to the character of the area in terms of architectural design, loss of trees and greenery, loss of views and light. They do not reference harm in terms of flooding and waterlogging. They do not reference harm in terms of congestion.

Presumption in favour where there is no design code must be balanced by a better defined and more comprehensive set of compliance criteria.

Presumption in favour does not apply for Statutory Listed Buildings (H2 F1). This should be expanded to include Conservation Areas, which are important heritage assets that define the character of the Area.

Presumption in favour should not apply to conservation areas.

The London Plan makes no clear reference to ‘Neighbourhood Plans’, particularly with respect to Character. In the forward to the London Plan the Mayor states ‘And it’s about delivering a more socially integrated and sustainable city, where people have more of a say and growth brings the best out of existing places while providing new opportunities to communities’. Local Communities are putting huge efforts into Neighbourhood Plans that define the local character and establish local design guidance. This is ‘what the people say’ and should be referenced.

Presumption in favour should be for developments which are in accordance with a design code and the Neighbourhood Plan (where applicable).

In conclusion, we reiterate two key messages;

Communication of the London Plan and the consultation has been inadequate. The forward by the Mayor states ‘Many Londoners won’t know about or have come across the London Plan, but it shapes their lives on a daily basis. It is one of the most crucial documents for our city’.

Many Londoners still don't know, and without a new communication drive and an extended consultation period, won't have had the opportunity to respond. Please extend the consultation period and provide better communications to support it.

The Mayor also states that 'good growth is not about supporting growth at any cost'. However there is significant discrepancy between policies such as D6 Optimising Housing Density and H2 Small Sites (with presumption in favour) and the aspirational statements in policies GG2 Making the Best Use of Land, G5 Urban Greening, G7 Trees, and SI12 Flood Risk Management. Better definition of 'the most accessible and well-connected places' and 'local amenities' are essential as are policies that take account of the CUMULATIVE IMPACT of numerous small site developments on flood risk, tree retention, car use, character and local infrastructure. Without appropriate checks and balances there will be unintended negative consequences of poorly controlled small site development of a quarter of a million new homes.

We are very happy to receive supplementary questions on these points, to meet the London Plan Team to discuss these issues, and to attend the Examination in Public.

Kind regards, David

David Harbott

On behalf of the Hadley Wood Association

On behalf of the Hadley Wood Neighbourhood Planning Forum

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