

Sadiq Khan - Mayor of London
New London Plan
GLA City Hall
London Plan Team
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Dear Mr Mayor

Thank you for the opportunity to respond 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 retrograde step to now 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.

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.

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.

The SHMA methodology should be reviewed in order 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'. 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.

Furthermore, this policy completely ignores the fact that many residents such as plumbers, electricians, and white van man in general use company vans even if they don't have a car, and they'll need somewhere to park their vans at night reasonably close to home.

The only reference to motorbikes is in para 10.6.7 in section 6:

Motorcycle parking will be evaluated on a case-by-case basis. Where provided, each motorcycle parking space should count towards the maximum for car parking spaces at all land uses.

This is a ridiculously negative view of the need for parking facilities for motorbikes, because you can park about six motorbikes in the space occupied by one car. While on the move, motorbikes are acknowledged to be one of the most flexible and least polluting of all forms of powered transport, so they should not be treated as if they are equivalent to cars. By contrast, there is ridiculous overprovision of cycle spaces, 75% of which will never be used; cycles and motorbikes should be positively ENCOURAGED to use shared parking spaces as this would also help to solve the serious crime problem of theft of motorbikes which are then used in street muggings, particularly in North London.

Overall, the car parking targets within the current London Plan are already stringent and should be left in place and not tinkered with, except that provision for motorbikes should be modified as discussed above.

An increase in housing targets.

The new housing target of 64,935 homes per year has led to a dramatic increase in the 10 year housing targets. Croydon's target has been increased from 14348 to 29490. In comparison Bromley have been increased from 6413 to 14240 and Sutton from 3626 to 9390. 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.

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

In conclusion Mr Mayor I would urge you to re-consider the policy areas that have been outlined, otherwise the proposed policy changes will 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 sincerely



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