

# Mr Dave Colling comments

Page: [Policy GG1 Building strong and inclusive communities](#)

Section: [N/A](#)

The intentions of the new London Plan are laudable but risk creating a new economic and social apartheid across the city.

By seeking to increase the proportion of social and affordable homes which will be developed to some extent through subsidy derived directly or indirectly from a smaller proportion of market priced houses risks driving house prices higher as developers will inevitably seek to recoup costs through higher prices or if unable withhold development. Either outcome drives home prices higher and ever further from the reach of the average (or indeed above average) wage earning London citizen.

Lower owner occupancy rates across London will reduce the feeling of having "skin in the game" through having pride and a stake in the local community and neighbourhood. It will also create a new expanding class of dependant social housing clients increasingly unable to transition from rental to ownership with limited rights of tenure and very little natural incentive to want to improve and grow their local environment and community.

To provide and sustain a thriving, connected and growing local community with a deep sense of place and connection the mayor should recognise and actively promote and expand the immense long term community benefits of right to buy rules and shared housing staircasing leading to the opportunity to buy your own home outright. A home is still a home even when it's no longer owned by a council or housing association!

Section C: Brownfield site registers should be publicly available for review this requirement should be incorporated into the plan.

Section D:

Policy H2Section D2 **is inconsistent**. It states :-

2) proposals to increase the density of existing residential homes within PTALs 3-6 or within 800m of a Tube station, rail station or town centre boundary through:"

whereas the accompanying justification at 4.2.5 states :-

"Incremental intensification of existing residential areas within PTALs 3-6 and within 800m of a Tube station, rail station or town centre boundary"

Which is it?

A precise definition of what constitutes a "transport hub"and "town centre boundary"and defined centrepoin of the transport hub for measurement purposes must be provided in the plan to avoid disputes.

Is the plan referring to Major Town Centres only ? Needs clarification and definition to avoid uncertainty

Section F Presumption in favour should additionally **exclude** small sites incorporating or immediately adjacent to any form of protected natural environment designation eg SINC SSI Green Chain and listed **Local listed Heritage Assets**.

Older people do not want to live in isolation and loneliness

Social Care is in crisis nationally and exceptionally so in London given the higher wage costs incurred.

I feel the current proposals on unit sizes and mix magnifies the problem by proposing geriatric ghettos.

The London plan makes no attempt to promote or incentivise co-generational living by requiring a percentage of properties to be developed that provide the opportunity for older londoners to co-habit homes with their grown up adult children thus potentially ( I believe substantially) relieving the pressure on on social care budgets, and freeing up underutilised housing stock by facilitating downsizing.

Additionally if such homes were made available the incidence of loneliness and isolation among older londoners would be reduced and younger generations ( grandchildren ) would have the benefit of childcare provision and additional role models during their early years development.

The mayor has an opportunity to make a cross generational change in housing provision for multi generational living I ask he embraces it in actively promoting the development of multi generational housing that would deliver immense social and emotional benefit.

Page: [Policy S1 Developing London's social infrastructure](#)

Section: [S1](#)

Redundant social infrastructure is often determined by the council based on budget constraints and often decided without proper local or neighbourhood consultation and behind closed doors precluding the ability to apply for ACV status and totally against the wishes of the local community.

The proposed plan needs to revisit its protection provisions and require a wide consultation and local support for closure before the council attempts to close sell off or redevelop the site. Based on local experience concentrating social infrastructure in town centres and away from local communities diminishes their value and inhibits use by many sections of the community e.g. mothers with young children, families without adequate access to public transport and older persons with mobility issues.

If a redundant social infrastructure site is proposed for redevelopment there should be an absolute condition for councils to require incorporation of a viable social infrastructure element similar to that which is lost in any proposals submitted which remains in public ownership and which is run and budgeted as a not for profit community asset.

Page: [Policy HC3 Strategic and Local Views](#)

Section: [Table 7.1](#)

The GLC included the Sydenham Ridge in its original list of protected Strategic Views. The Ridge forms one of the highest areas of London at over 100m above sea level so creating a natural and environmentally biodiverse visual boundary when viewed from the centre.

The table in the new London plan omits completely. Is this an oversight or deliberate omission. If the latter it is very disappointing as it would then seem no view at all from, or of, South London is deemed worthy of protection which is perverse as the Sydenham Ridge incorporates many treasured elements of biodiversity woodland and the last remaining remnants of the Great North Wood providing a largely natural wooded skyline which is increasingly rare around London and on which can be viewed from many miles distant in Essex Surrey and Kent.

Surely a unique vista and view worthy of the Mayor's continued protection.

Page: [Policy SI3 Energy Infrastructure](#)

Section: [9.3.7](#)

The London Plan proposals should acknowledge the pioneering contribution already made toward carbon neutrality by existing installed residential solar installations and offer planning guidance which protects their power and heat generation by proposing refusal of developments which would result in loss of generating or heating capacity through loss of sunlight and /or overshadowing. This is especially important given the other proposals in the plan for intensification through increased building height in large parts of London

Solar installations need some form of planning protection, otherwise the incentive to install (and thus contribute toward carbon neutrality) will be diminished and ultimately lost.

Page: [Chapter 10 Transport](#)

Section: [N/A](#)

Reducing car use in central London is the correct approach however a one size fits all approach fails to deliver benefits to residents as you move farther out from the centre Lower PTAL ratings in outer London greater distances (and more time required) to travel over non-linear routes mean that the car is essential for moving around especially for families with children A flexible transport policy recognising that people use cars because in many cases they have to in order to go about their daily lives at the pace demanded by living in London is desperately needed.

The Mayor's transport policy also needs to recognise that London is not entirely flat.

Transport Policies especially relating to cycling, walking and PTAL calculations need to take into account topography and terrain and acknowledge that for many residents cycling up a sustained 10% gradient is not an option and never will be.



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**From:**  
**Sent:**  
**To:**  
**Subject:**

Dear Mayor Khan and the London Plan team,

With reference to the London Plan consultation I wish to respond as follows.

Trees and Woodland (especially the few remaining remnants of ancient woodland remaining - e.g. the Great North Wood ) are a unique Capital Asset deserving our full care and protection from being further decimated, divided and reduced in size and majesty by encroaching development. London was once surrounded by forest now its described as woodland, in future if we don't actively preserve and protect what little ancient natural habitat and woods that still exist in London will only have lines of street trees. Valued - yes but akin to viewing animals in a zoo. Our children will be denied the opportunity to see, experience and interact with "Natural Nature" Mayor Khan, please take this opportunity to secure your place in history (and gratitude of future generations of Londoners) by affording unequivocal legal protection and obligation to preserve in their wild state, our remaining Ancient Woodland by granting enhanced MOL status now. Thank you.

In the sections listed below (in the same order as they appear in the draft London Plan).

- Paragraph 1.3.3. Recommend an addition (in CAPS) to the following sentence: "Access to green and open spaces, including waterways AND TREES, can improve health, but access varies widely across the city."
- Paragraph 3.9.5. I support the inclusion of "Protection for trees" as an issue in the amplification of potential negative impacts of large-scale basement development beneath existing buildings.
- Policy H1. Increasing housing supply. I recommend that Sentence B2)d is clarified so that "public sector owned sites" will not include woodland, parks and open spaces.
- Paragraph 4.2.9. I support the principle of "no net loss of overall green cover" as a result of small housing developments, and support "off-site provision such as new street trees" in order to achieve this principle. I recommend an addition (in CAPS) to the following sentence: "Loss of existing biodiversity OR GREEN SPACE, as a result of small housing developments, should be mitigated through measures such as the installation of green roofs, the provision of landscaping that facilitates sustainable urban drainage, or off-site provision such as new street trees in order to achieve the principle of no net loss of overall green cover. Rainwater attenuation features should be incorporated to achieve greenfield run off rates. LOSS OF ANY PUBLIC GREEN SPACE WILL BE COMPENSATED FOR WITH ALTERNATIVE ACCESSIBLE SITES."
- Policy S4. Play and informal recreation. I support section B2)d, that residential development proposals for schemes that are likely to be used by children and young people should incorporate good-quality, accessible play provision for all ages, of at least 10 square metres per child that: "incorporates trees and/or other forms of greenery".
- Policy G1. Green infrastructure. I support this policy, and subsequent narrative that mentions the important role of trees.
- Policy G5. Urban greening. I support this policy, including the recommended Urban Green Space Factor, and subsequent narrative that mentions the important role of trees. I support the inclusion of the role and weighting for woodland and trees in Table 8.2 - Urban Greening Factors. I recommend including a reference to Residential Development and Trees (Woodland Trust, 2015, woodlandtrust.org.uk/residentialdevelopments).
- Policy G6. Biodiversity and access to nature. I support this policy. I recommend that Sites of Metropolitan Importance and all ancient woodlands are added to the categories of planning applications that must be referred to the Mayor.
- Policy G7. Trees and woodlands. I support this policy. I recommend that Section B)1 is strengthened as follows (amendments in CAPS): "GIVE THE STRONGEST POSSIBLE protection TO 'veteran' trees and ancient woodland, ESPECIALLY where these are not already part of a protected site". I support the subsequent narrative on the role of



trees, particularly paragraphs 8.71 – 8.73. I recommend referring London boroughs to guidance on ancient woodland and veteran trees: Planners' manual for ancient woodland and veteran trees(Woodland Trust, 2017, woodlandtrust.org.uk/plannersmanual).

Please accept this my formal response to the consultation. I will look forward to hearing from you as the Plan progresses.

Yours,

Dave Colling

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