

Sadiq Khan - Mayor of London  
New London Plan  
GLA City Hall  
London Plan Team  
Post Point 18  
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Dear Mr Khan

**Comments on draft London Plan**

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 increase in housing targets.**

The new housing target of 649,350 homes over ten years across London has led to a dramatic increase in the 10 year housing targets by borough. Croydon's 10 year target has been increased from 14,348 to 29,490, an increase of 15,000 homes. In comparison Bromley, which is significantly larger in land area, has been increased from 6,413 to 14,240 (an increase by half the amount that Croydon has seen) and Sutton from 3,626 to 9,390. Croydon has just had its 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 been achieving challenging targets in housing supply for some years now. Croydon has never had access to large areas of brownfield land where a significant number of properties can be delivered in one go. The relatively few medium-sized brownfield sites we did have are now all densely developed (New South Quarter, Cane Hill), and the sites becoming available are very modest in size. Other boroughs have not produced anywhere near the same quantity of housing as Croydon, and perhaps it is time for those boroughs to shoulder more of the load.

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

**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. It should also make clear that any small sites policy should be subservient to the back garden policy, where a borough has this in force.

**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 develop as they please, without being subject to a clear requirement on 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 more bedrooms. This is especially worrying 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 and councils will be tempted to predominantly build smaller units that are cheaper and do not provide for communities of tomorrow.

Other proposed policies – such as the small sites policy - actually encourage the demolition of family homes in order for blocks of flats to replace them. It is particularly important, as we increase the number of one and two bed flats available by such large amounts, that we see growth in availability of larger properties to match, so protecting the ones we have is a sound strategic objective. The alternative would condemn expanding families to stay in overcrowded conditions due to lack of available larger properties close to their local support networks. The definition of small sites has been expanded and has become too wide. This seems likely to result in an increase in development on very cramped sites, with inadequate amenity space.

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. The current standards, whilst quite stringent, have not eliminated cars from new developments being parked in areas outside that development's curtilage. The 'low hanging fruit', persuading less car-dependent residents from owning cars, has already been taken. It is hard to see that making the requirement even more stringent is going to do anything other than exacerbate the problem.

The targets within the current London Plan are already stringent and should be left in place and not amended for ideological reasons.

**In conclusion, 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 on existing character.**

Yours sincerely

**Cllr Tim Pollard**

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