

Sadiq Khan - Mayor of London  
New London Plan  
GLA City Hall  
London Plan Team  
Post Point 18  
London SE1 2AA

1 March 2018

Email: londonplan@london.gov.uk

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.

I am particularly concerned about the health implications for families raising children in such small, cramped spaces with little or no outside space. Applications approved will lead to inappropriate flats being developed in spaces that otherwise would not have been previously considered suitable.

Whilst flats can make good family homes it is important that three and four bedroom developments are also considered. All we will see through this policy are a dearth of one and two bedroom apartments at best.

**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 targets within the current London Plan are already stringent and should be left in place and not tinkered with.

The result of this policy is already causing a decline in the small business community which is essential to some wards whose elderly and vulnerable are reliant on these services and because of mobility and disability issues can only access small parades of shops by car. Many communities are becoming socially isolated and lonely as the only means of contact is being cut off. The closure of small high street businesses should not be hampered by implementing policies that are destructive. There are also environmental issues caused by unnecessary traffic to central shopping areas.

The removal of key assets such as car parks and other infrastructure assets can only be harmful to local communities. I don't feel that this matter has been addressed within the plan.

**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.**

**The local communities in the London Borough of Croydon hope that you will look favourably on the comments they have made through petitions and their local councillors who feel that they have fallen on deaf ears and on the comments put forward in this correspondence which would go some way to address the disquiet in our communities.**

**Whilst we all understand that housing is a priority we have many areas in the town centre which we have identified for development which would take the pressure off our outer residential areas that are quite different in character and landscape and would be unrecognizable under this current plan.**

Yours sincerely

Cllr. Yvette Hopley  
Sanderstead Ward  
Shadow Cabinet Member for Adult Social Care and Health  
London Borough of Croydon