

Jinder Ubhi

From: Roger Pidgeon <lamontplan@btinternet.com>
Sent: 27 February 2018 13:43
To: Londonplan
Subject: Draft New London Plan Representation

Draft New London Plan

Representation re Policy H2 and paragraphs 4.2.5 + 4.2.6

Policy H2 B advises that the GLA supplementary planning guidance (SPG) will be used to assess planning applications for small site developments.

Para 4.2.5 flags that incremental intensification around transport nodes will be part of housing intensification to the net housing stock.

Para 4.2.6 notes that a revised design guide will be produced for housing development.

The current SPG points to a minimum standard in excess of the Nationally Described Space Standard published by the then DCLG in March 2015.

Para 10.i of the national standard requires that the minimum floor to ceiling height is 2.3m for at least 75% of the Gross Floor Area.

The GLA Interim Housing Design Guide 2011 was intended to be applied only to publicly funded developments.

On page 9 it states 'In the first instance the Mayor will require that the full content of the interim LHDG be applied to developments that are supported by the LDA or on LDA land'.

This guide featured in The London Plan Minor Alterations 2016 in Table 3.3 where minimum standards are set out. Footnote 3 to this table acknowledges the National Described Space Standard but 'strongly encourages' a minimum height of 2.5m. But does not recognise the limitations of the 2011 Guide namely that it was prepared to be applied only to publicly funded developments.

If the floor to ceiling distance of 2.5m is to be continued as being strongly encouraged for London the encouragement should be qualified as applying only to public funded developments or the national standard should be used.

If neither of these alternatives are put in place, a key component of policy H2, that of incremental intensification 'will be undermined.

In conclusion I request para 4.2.6 should be re worded to address this representation to the effect that the revised design guide will apply to publicly funded developments only in the matter of floor to ceiling heights.

Roger Pidgeon

Lamont Planning Associates
PO Box 339
Watford WD19 4XB
01923 242226

Office hours; Monday, Tuesday & Thursday 0900-1730 Closed Wednesday & Friday

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From: Roger Pidgeon <lamontplan@btinternet.com>
Sent: 23 February 2018 15:15
To: Londonplan
Subject: Draft New London Plan

Categories: Red Category

The Draft London Plan 2017, Chapter 8

Green Infrastructure and Natural Environment

Policy G3 Metropolitan Open Land

Representation:

Para. 8.3.2 and Footnote 104 are misleading. There is no reference in the NPPF to Metropolitan Open Land (MoL).

This paragraph will both misdirect Boroughs when formulating Local Plans and when making planning decisions.

Because the NPPF does not apply to MoL, the NPPF test of 'very special circumstances' cannot be applied when decision making.

When plan making the Draft London Plan sets out the purposes of MoL in policy G3 D. These four criteria are different from the five purposes of the Green belt set out in para 80 of the NPPF. This underlines that MoL is not Green Belt nor is it a surrogate green belt

Para 8.3.2 and footnote 104 should be deleted from the plan.

Please accept my objection and I will appear at the Examination in Public if required.

Roger Pidgeon

Lamont Planning Associates
PO Box 339
Watford WD19 4XB
01923 242226

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