



Rt Hon James Brokenshire MP

Member of Parliament for Old Bexley & Sidcup

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New London Plan
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Via email: londonplan@london.gov.uk

James Sadiq,

Draft New London Plan

Please take this letter as a submission in connection with the public consultation on the draft new London Plan which will set out the development strategy for London through to 2041. I welcome the opportunity to comment on this hugely important document and the intent behind the Plan to expand housing supply to respond to London's undoubted housing needs.

The Plan should seek to deliver housing growth in a sustainable way and with a sense of community and identity and belonging to a particular area. I fear that the Plan will not deliver this and risks re-making some of the mistakes of the past with its seemingly rigid encouragement of high rise units and very dense development in a way which does not have regard for the social infrastructure needed to support such communities (such as schools, transport, hospitals etc.). If implemented in its current form, many outer London areas will look fundamentally different to how they do now.

My underlying concerns relate to: the assumptions of the Strategic Housing Market Assessment underpinning the plan (including the size and nature of units required); how the type and nature of housing prescribed by the Plan meets need; the need to maintain or establish sustainable communities with a sense of identity, place and belonging; the potential impact on parkland which does not currently have greenbelt or other suitable designation; the rigidity and prescriptive nature of the Plan; and the emphasis on small site development and back garden development over appropriate brownfield industrial land.

The extent of the emphasis on small units (largely one or two bedroom flats) rather than a balanced mix of family homes is questionable and risks the creation of overcrowded accommodation and family units with adult children being separated as a result of the lack of suitable larger accommodation.

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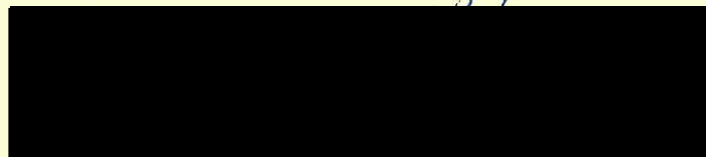


There are some specifics I would highlight:

- The policies and targets on small sites are prescriptive and I believe will cause significant problems in areas like Bexley. They are likely to encourage developers to buy up existing family homes and turn them into 1 or 2 bedroom flats especially as the defined 25 units would still be significant in the context of the character and nature of many suburban streets. This is then amplified further when the proposal remove the restriction on back garden development is taken into account. I believe that the current protection for back gardens should be maintained and the policies around small sites changed.
- The prohibition on no net reduction in Strategic Industrial Land risks preventing the development of brownfield industrial land. This has the potential to undermine the delivery of significant housing development and significant regeneration schemes. I believe this rigid approach is mistaken and rather than being so prescriptive the Plan should allow local councils greater flexibility to take account of local circumstances.
- The housing target for Bexley has been increased nearly threefold without any additional infrastructure planned. This lack of detail on how deliverability can actually be achieved is questionable.
- The presumption in favour of small housing developments with limited planning considerations around greenbelt land and other specified matters does raise important issues around the erosion of recreational land such as parks and open spaces which do not have specified status. This might force Councils into releasing more of these areas in order to meet the Plan's housing targets thereby reducing greenspace for the benefit of communities.
- The zero parking target for developments around mainline stations in areas such as Bexley is likely to add to overall parking issues and displace problems into neighbouring areas. I believe this is too rigid and should be changed.

As a general observation, I note that the London Plan policies seek to override the National Planning Policy Framework on the basis of political assertion. There is a clear hierarchy of planning policy considerations within the planning system which provides legal certainty and clarity and this should be respected and upheld.

Yours sincerely,



Rt Hon James Brokenshire MP