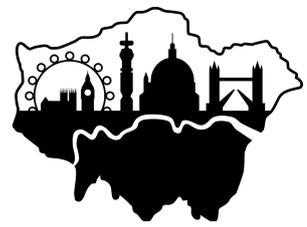


THE LONDON FORUM of Amenity and Civic Societies

Founded 1988

Registered Charity No.1093134



17 September 2019

Rt Hon Sadiq Khan
Mayor of London
City Hall,
The Queen's Walk,
London SE1 2AA

Dear Mr Khan,

Small Sites Policies H2 and H2A

The London Forum of Amenity and Civic Societies is the umbrella organisation for civic and community groups across London.

We were invited by the Examination in Public (EiP) Inspectors to attend 88 of the 94 hearings on the draft New London Plan (NLP), based on our responses to it made in February 2018. We recommended many alterations, several of which were recognised in the changes proposed by your London Plan team.

However, our reservations about the new **small sites** policies were not addressed, and in some ways the consolidated July 2019 changes to Policies H2 and H2A strengthen London Forum's view that these policies will have adverse consequences in many boroughs. In essence, our concern is that the presumption in favour of development for small sites where no design codes exist will give rise to large numbers of planning applications for which there has been little or no community engagement. Many could be turned down by Local Planning Authorities, but allowed on appeal despite fierce opposition within the affected communities. The hostility to these policies and resultant overloading of the appeal system could seriously damage the prospects for ramping up the housing contribution from small sites and jeopardise the achievement of the NLP housing targets.

To be sure that our views accord with those of other respondents and participants in the EiP, the attached extract from their statements has been compiled. You will see that there was considerable opposition to the small sites policies. You will be receiving the report of the EiP Inspectors shortly and London Forum asks you to consider carefully their recommendations on small sites alongside this evidence of NLP EiP participants.

London Forum proposes that, if the NLP small sites policies are to succeed, there must be active community engagement in the preparation of relevant local planning policies and in the design of the schemes coming forward. For those areas without Neighbourhood Plans (i.e. most of London), this requires boroughs to carry out context and character analyses and to compile design codes.

We have asked all our members to contact their borough Councils to urge them to get on with this task, so that small sites applications stand the best chance of enjoying the support of local communities. This will take time, as the task is not straightforward and urban design resources in most boroughs are scarce.

Therefore, we ask you to delay by one year the implementation of the small sites policies in the draft NLP and to accelerate your production of associated guidance. This will give time for boroughs to amend their Development Plans, and to put the mechanisms in place to assess increased numbers of small site applications.

Yours sincerely,



Peter Eversden MBE,
Chairman,
London Forum of Amenity and Civic Societies

Copies sent to:-

The Rt Hon. Robert Jenrick MP
The Rt Hon. Esther McVey MP
London Assembly Planning Committee
London Borough Planning Officers
London MPs
Jules Pipe CBE, GLA
London Councils
Centre for London
Urban Design London
Historic England
RTPI
TCPA

