

Dear Manisha & Judith

I was pleased to meet the LBH policy team recently to discuss my objection to policy DMH 6. The officers were helpful and explanatory, but I doubt I have persuaded them to recommend any further changes to the wording. **So please take this email as a brief clarification and amplification of my main points.** (Note: LP = London Plan).

I commented on DMH 6 in both 2014 & 2015. LBH's recent summary of my 2015 reps, omitted an important point which said:

*The ... restrictions ... as revised, will militate against the achievement of the new (2015) London Plan housing targets, including the loss of windfall and other small housing sites, at a time when there is a serious housing shortage in London. They cannot be justified in this context.*

I explained this in more detail in my response to the 2014 consultation, albeit in the context of the earlier LP (and, now, the earlier NPPF). However the principles and sentiments remain.

LBH subsequently (2015) made changes to draft DMH 6 and its supporting text but, as far as I can see, no further mods (minor or major) have been made on this issue since then.

I do not consider that the Council's 2015 actions have fully addressed my submissions, and I therefore wish to maintain my objection. In the housing context, I consider that a "presumption against the loss of gardens" is overly strict, unnecessary and is not locally justified (as required by the adopted LP). Each case should continue to be judged on its individual merits. Previous Local Plan policy was less restrictive referring to the avoidance of 'inappropriate' development of gardens.

It is not clear to what extent, if any, the Inspector will take account of the latest (Nov 2017) draft LP, but even if the proposed massive hike in housing targets is reduced, it is now clear that housing pressures on the Boroughs will continue to increase. It is noted that the draft LP omits the provision which allows the Boroughs to introduce a presumption against development on back gardens (adopted LP para 3.34). LBH's restrictive policy thus seems increasingly inappropriate. The new NPPF is also relevant here.

Another key point is the importance of the availability of small sites to smaller builder/developers who cannot fund or handle strategic land

releases and other larger comprehensive sites. NHBC & RTPI are just two of the bodies concerned about this (see 'Key Findings', and summary documents attached). NHBC points out that the market share of small builder/developers has declined from 28% to 12% between 2008 & 2015. Also that the planning process, its costs and land availability are the most serious business challenges for small builder/developers. Indeed, land availability is the most significant constraint for firms building 1 -2 homes per year. It also notes that this sort of business typically builds bigger individual homes. They thus address the specific local need for family homes. The RTPI expresses a similar concern, pointing out that small builders delivered almost 40 per cent of new homes as recently as the 1980s (see first three paras of attached doc).

Garden land (often sustainable corner sites with good services, access, etc in established urban areas) is often the life-blood of such small developers.

Finally, my views are similarly applicable to **DMH 4**, the heading to which I now see has been expanded to include 'Redevelopment' rather than simply 'Residential Conversions' (its original heading). It imposes a wholly artificial limit of 10% on the number of properties in a road which can be redeveloped into flats. I have not previously picked this up, but DMH 4 seems in danger of slipping through unnoticed because of its initial heading and its position in the 'resi conversions' section. I thus hope my obs can be taken on board.

At this stage, I do not propose to attend the Hearing session, unless the Inspector so requests.

Please let me know if this requires clarification.

Many thanks.

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