
Consultation - Draft New London Plan

Dear Sirs,

I strongly object to the latest GLA Plan, which shows little understanding for the suburban pattern of development in London and in consequence takes even less cognisance of the recent London Plan submissions from the individual Boroughs. This initiative would appear to be in contravention of the provisions of the Greater London Authority Act of 1999.

As a result there are aspects of the Mayor's approach which, if implemented, would have far reaching and damaging outcomes for the outer London boroughs in general and for Hillingdon in particular.

It is particularly to be deplored that the latest GLA Plan policies offer no clear protection for Conservation Areas or local heritage designations, nor for the settings of listed buildings within the surroundings of proposed new developments.

The GLA should take proper account of the fact that Hillingdon comprises a number of former mediaeval and post-mediaeval villages and of small towns which grew up along the roads leading out of London. Each has its own historic character and the sense of place and identity, and to which their residents' loyalty is very strong.

Moreover each historic core has been designated a Conservation Area, with other Conservation Areas taking into account the quality of their Victorian, or interwar, residential or canalside industrial suburbs.

There is already pressure to redevelop or infill the back gardens of larger houses leading to compromised designs, a loss of well detailed Victorian and 1920's houses. It has also led to a creeping erosion of gardens - with their amenity, biodiversity and flood mitigation value, an increase in hard standings, and a relentless attrition of cherished streetscenes.

There are at least 17 Conservation Areas and numerous Areas of Special Local Character in Hillingdon. These would be directly affected by the latest GLA Plan policy to target sites within a set radius of the Borough's seven town centres. Terms such as 'underused sites' might be taken to mean large family houses with gardens, and how are the Council to interpret 'unacceptable levels of harm to designated assets'?

I agree with Hillingdon Council that catch all GLA Design Guide could never provide the subtlety necessary for preserving the character of the many towns and villages which make up outer London, whilst the

specialist resource required by each borough to write individual design codes for all of these areas would be unrealistic and the task unattainable.

The existing Green Belt policy as defined by wording in the National Planning Policy Framework has been very effective in preventing inappropriate development in the Green Belt. Any weakening of current Green Belt policy will not result in more efficient use for community benefit (whatever that means) but instead be the subject of speculative development proposals by the development industry. This wording should not be changed.

Defining Metropolitan Open Land in the GLA Plan as a matter of strategic importance should not be taken to mean that these open spaces should not be the concern of boroughs like Hillingdon. The GLA Plan makes no mention of the provision for more MOL, let alone any mechanism for ageing changes and development. It is my view that MOL is only a strategic matter because these spaces may sometimes straddle several boroughs.

GLA water policies concentrate too much on the Thames and major tributaries, without proper reference to upstream management of smaller rivers such as the Pinn, which is increasingly prone to flooding. If the GLA plan is going to tell boroughs what to do it is going to have to pick up on a lot more details such as this – or perhaps they should leave competent boroughs like Hillingdon to get on managing the local areas they know best.

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