

DRAFT NEW LONDON PLAN

Page 1.

Eastcote Conservation Panel

c/o Mrs. Lesley Crowcroft - Chairman

Eastcote forms part of the London Borough of Hillingdon.

The Eastcote Conservation Panel [ECP] by this communication fully supports the submission made on the Draft London Plan, by the London Borough of Hillingdon [LBH].

Further comments from ECP are set out below.

Introduction.

The Mayor does not appear to realize the difference between inner and outer London. A one size fits all plan cannot and will not work.

The area covered by LBH was once known as Middlesex, until we were forced into what is now known as Greater London. LBH is made up of ancient villages, most of which are mentioned in the Domesday Book and fine Metroland Towns. This means our communities have more than a thousand years of history and culture.

This should be respected.

The approach made in this draft document will destroy the character of both ancient villages and Metroland towns, this is unacceptable.

The proposed plan in many areas falls outside the measures granted in the Greater London Authority Act 1999. Also, at times tries to over ride the NPPF.

There appears to have been a lack of communication with the London Boroughs in compiling this document. Also, there is great reliance placed on guidance documents **yet** to be written.

The Mayor should have had these guidance documents published ready to accompany this draft plan. We are being asked in parts to comment on the unknown. This is not a satisfactory method of consultation.

Chapter 1. Good Growth Policies.

The growth of any town or village should respect the heritage and culture of that community. The policy of cramming in unsuitable buildings, even it seems into designated Conservation Areas, cannot be classed as *good growth*.

The proposal of the development of small sites should be removed from the draft plan, this type of indiscriminate building cannot be controlled.

Chapter 2. Spatial Development Patterns

The Mayor does not explain his thinking when using the phrase 'appropriate intensification'. This could mean anything. A plan of this magnitude should be clear and concise, not left open to interpretation and conjecture. Any new development should blend in with the surrounding area and not be over dominant, the policy of small developments could and will

Page 2.

change an area beyond all recognition thus becoming over dominant and destroying the community, culture and heritage of the village or town.

High rise or tall buildings in the centre of towns will be out of context with any Metroland Town.

Chapter 3. Design

Elsewhere in this draft plan there is great emphasis placed upon green roofs [this after existing gardens have been built on] For a building to have a green roof/roof garden it has to be flat. Therefore, the Mayor is proposing one style of building across the board, which will be cuboid in shape but with varying heights. This is not good design and will not enhance any ancient village or Metroland Town.

The lack of provision for quality amenity/ play space is disturbing. Green roofs/gardens are not suitable for children's use. Children need a safe play space that can be seen from the parental home. The loss of the ability for any human to have private, good quality outside space leads to many cases of poor mental health. This plan does not take this problem into consideration, in fact it will exacerbate the problem.

Little thought has been given to the building of basements. The geological conditions of any area must play a large part in determining whether or not it is suitable to excavate such a large area. Again one size fits all is not good planning. This whole subject needs a much closer investigation. Preferably it should be left to each local council to decide what is possible within their boundaries.

These sections as with many others in this plan needs to be reconsidered as per the comments provided by LBH.

Chapter 4. Housing

The Mayor advocates the increasing use of small sites for development.

Policy H2. Small sites.

D1. Infill development on vacant or under used sites.

D2 (d) Infill within the curtilage of a house.

The NPPF does not allow the building of dwellings in gardens.

Although this plan does not specifically use the word 'Gardens' the policy H2, D1 & D2(d) means exactly that, building in gardens. 'Garden Grab'

We are not aware that the Mayor has greater powers than the Secretary of State and is able to change Government policy. Therefore, this policy must be removed from the Plan as it does not conform with the NPPF. As mentioned earlier this is not planning for good growth. It is a license for a free for all, a developers dream.

The loss of biodiversity by building on land that was once a garden cannot be replaced by the proposal of having green roofs/walls and extra street trees. Green roofs are expensive to

Page 3

install and costly to maintain. Green walls are even more difficult to maintain and will use a considerable amount of water, which will be a waste of a precious commodity.

LBH has made it very clear in their submission that Hillingdon Borough is not served by a very good public transport system. Not everyone works in the centre of London, owning and using a car in most areas of the borough is the only way to travel to work, visit a hospital etc. The restrictions on parking spaces per dwelling in this plan do not take into consideration the varying needs of the different London Boroughs. This should be reconsidered and left to each borough to set it's own standards according to need.

The excessive increase in the number of dwellings allocated to LBH is not possible. More than 15000 in 10 years is a threefold increase.

The Mayor, although against expansion at Heathrow has not taken into account the extra stress this would place on housing. Therefore, the draft plan should include a strong reason for refusal of the Heathrow expansion citing that the increase of population cannot be accommodated. Gatwick has far more scope for population increase than the current situation of the airport. The use of Gatwick should be stressed in the draft plan.

Chapter 5 Social Infrastructure.

The objections as laid out in the LBH submission cannot be bettered here. We fully concur with the statements made by LBH.

Chapter 6. Economy.

The comments as made by LBH are fully supported here.

Chapter 7. Heritage & Culture.

Protecting heritage and culture of any community is of vital importance.

Eastcote has 3 Conservation Areas, 1 Area of Special Local Character, 31 Grade 2 listed buildings and many Locally listed buildings and structures.

However, earlier policies of allowing infill building in Conservations Areas & ASLC must be deleted from the draft plan if these areas are going to keep their special character. The same applies to the Statuary Listed Buildings and Locally listed buildings, not all of these are in Conservation Areas, therefore there should be stronger protection to stop all being swallowed up by inappropriate developments as laid out in earlier chapters. Thus being in line with the NPPF.

Night time economy.

Stronger measures are needed to ensure that Local Authorities have the power to refuse such venues as night clubs being opened in smaller towns and villages. Most of the Metroland Towns are within residential areas, late night/early hour entertainment causes problems to the inhabitants of residential areas.

The same applies to the hire of parks for festivals etc., especially where the park is not near to adequate public transport that can deal with large crowds attending.

Chapter 8 Green Infrastructure and Natural Environment.

The protection of all Green Belt land is essential. Elements of the proposals in this draft plan weaken the policies of the previous plan. The excessive increase in the housing total for the Borough will undoubtedly weaken the policy and will encourage developers to encroach onto Green Belt land. This policy as set out in the previous London Plan should not be changed. It is not clear what is meant by the terms 'enhancement' and 'appropriate multifunctional uses' grey, muddled terminology like this leads to many problems down the line.

The suggested proposal to 'enhance' open spaces e.g. Metropolitan Land is again very weak. There must be strong policies to protect the conservation areas of MoL and other parks from inappropriate developments in the buffer zone around these areas.

As is the Mayor's intention to add extra guidance to the All London Green Grid. These proposals should be on the table now, not a proposal for the future. How can we be expected to comment fully now, unless we know what is to be coming in the future.

The draft plan does not appear to recognise or give any support to protecting green chains. These are vital corridor links between open spaces to allow the migration of wildlife. This omission should be addressed.

Many areas of the built environment are already lacking in nearby open space. The proposals within this draft are set to take away a lot of open space used by the majority of the inhabitants, namely gardens. As the Boroughs are going to be expected to treble their annual rate of dwelling production, where are they supposed to find extra land to produce green open space? This is not at all clear, if in fact it has actually been thought about. One section of this plan contradicts another.

It must be stated again that green roofs/walls/roof gardens/extra street trees are not a substitute for gardens. Gardens bring many advantages for biodiversity, flood risk control, improved air quality etc., which the above proposals cannot bring.

Chapter 9. Sustainable Infrastructure.

The comments put forward by LBH should be accepted. Just one addition, the proposal for Green Walls will add significantly to water use to keep these structures flourishing. They should be omitted from the plan as they will not achieve the desired effect of improving air quality, instead will be a waste of water.

Chapter 10 Transport.

The Mayor appears to have a vast number of improvement schemes for inner London, yet none for the suburbs.

The proposed car parking levels for this area [Eastcote] is not acceptable, reasons have been given in other chapters.

Page 5.

Heathrow Airport, this proposal should be strongly opposed. The destruction of thousands of homes will only increase the number of homes needed in this area.

In general we support the submissions made by LBH for this chapter.

