

Sent by:-1st February 2018

Jackie Redrup
Planning Representative
Eastcote Residents' Association

[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]
[REDACTED]

DRAFT NEW LONDON PLAN

I make the following observations on behalf of the Eastcote Residents' Association (ERA) that is part of the London Borough of Hillingdon (LBH).

We would stress that we fully support LBH's submission, providing as it does such a detailed, coherent and considered response to all aspects of the plan, that affect not only the Borough, but our wider community within the Outer London area.

LBH's conclusions are that there are a number of the proposed policy changes that will have significant adverse impacts on the Borough its people, its built environment, its natural environment, its heritage and wider policy objectives.

For your information, within the Hillingdon Borough, our Association covers part of each of the wards of Cavendish, Eastcote and East Ruislip and Northwood Hills.

As such our area encompasses 3 conservation areas, 1 area of special local character, 31 grade 2 listed buildings and numerous locally listed structures. It has green spaces that are much used by local residents and external visitors and has, at its centre, a Metroland environment that is deserving of preservation.

The viability of the enactment of the Plan across London

Throughout the document it appears there has been no clear and sufficient distinction made to accommodate the very different issues and needs between those of Inner and Outer London Boroughs.

Equally, all Boroughs have a legal obligation to use the London Plan policies to determine their local planning policies (0.0.09 refers)

- Thus the included large number of prescriptive policies will have to be enacted in local policy irrespective of whether they actually provide 'good growth' within a Borough and/or the areas within it. In many cases local policies can be applied directly from the Plan without the need for local input. This combination effectively takes away leeway for a Council to make its own determinations to provide truly locally based plans addressing local issues.
- 'A one policy fits all' approach for Inner and Outer London is unlikely to be viable, within these areas, and to meet the overall requirements of the plan and its detailed remit.

Good Growth Concepts

The concept of 'Good Growth' in all its aspects is admirable but many of the policies within the plan are at odds with this, in that enacting them could very well lead to the opposite result.

Unrealistic Housing Targets

The requirement to raise the annualised housing target for the whole of London from 42,388 homes to just under 65,000 is unlikely to be achievable - the previous lower target was not reached, nor have the required levels of genuinely affordable housing been met.

Specifically, LBH are expected to provide an annualised average of over 1,500 new residential units (based on a target of 15,530 units over 10 years). This increases the annualised requirement almost threefold and is around double the average achieved over the last 4 years.

765 units per year are expected to be delivered from 'small sites'. Quite apart from whether this number can be achieved, the pressure to deliver them is likely to lead to poor design and developments that will be out of character with their surroundings.

Specific Policies that are likely to have the opposite result of that intended

Many of the policies detailed to achieve these ambitious numbers will not necessarily have the desired results and actually have the potential to adversely affect our environment. This is particularly the case for places like Eastcote and other similar areas in Hillingdon, where we have small towns and villages with strong and long histories, and Conservation Areas designed to capture their merits and preserve them.

We would cite the following examples of concepts and policies that, if enacted, are very likely to take away the special character of these areas:-

- There is a presumption for extensions, conversions, redevelopment and infill development within 800 metres of tube stations or town centres.
- There is no longer a presumption against infill building in back gardens (garden grab), contrary to the provisions of the NPPF.
- The redevelopment or upward extension of flats and non-residential buildings that will be out of keeping with the surrounding buildings and adversely affect the skyline.
- The reduction in property sizes, with a greater emphasis on 1 and 2-bedroom properties, and the suggestion that family homes can be viably reduced in size. Such policies will also reduce the provision of quality ground level amenity space.
- The lack of specific support for the preservation of Conservation Areas, Areas of Special Local Character and Statutory and Locally Listed Buildings.

LBH's submission has commented on all the above and we very much support the detailed valid points they have raised in all cases.

Car Parking Provisions

Reduced standards for the number of car parking spaces, particularly in areas with poor public transport and where the plan makes no provision for public transport enhancement, is of concern. Hillingdon has particular issues with this.

Eastcote has already experienced the results of the reduction in the number of car parking spaces provided on new sites – it has not led to a reduction in the number of cars, but rather greater parking problems on the roads. We note the LBH makes the point that car ownership in Hillingdon is higher than any other London borough, whilst having the lowest average PTAL. In addition, it is the London borough that has the highest number of residents travelling to work by car, reflecting the number of residents working outside London and the limited public transport.

Green Infrastructure

We support the London Green Belt Council's submission on this Draft Plan which does appear to seek to protect green belt land and uphold the NPPF policies in this regard. However, there is a concern that allowance is made for development 'in exceptional circumstances' and that the requirements to meet the aggressive housing targets, could open the door for the case to be made for such circumstances, particularly in relation to providing the supporting infrastructure such as schools or a hospital etc.

Whilst Metropolitan Open Land is protected to some extent, there is a lack of any clear detail as to what the GLA will do to safeguard MOL.

In addition, protection strategies for the all-important natural resources of Green Chains should be added.

Heathrow Airport

It is noted that the Mayor's position is that Heathrow should not be extended. However, this is not backed up and strengthened by more robust reasons for this stance, nor proposals as to what should be done about this issue – in particular there is no mention for the development of Gatwick Airport.

In Sum

The London Plan's own Viability Study quotes the NPPF's remit in this regard which states that plans should be deliverable and that the sites and scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened. It goes on to say 'Understanding Local Plan viability is critical to the overall assessment of deliverability. Local Plans should present visions for an area in the context of an understanding of local economic conditions and market realities. This should not undermine ambition for high quality design and wider social and environmental benefit but such ambition should be tested against the realistic likelihood of delivery.'

We submit that the combination of the large number of policies, their mostly prescriptive nature, and the fact that some contradict others in their required outcomes, together with their being applied across the board throughout both Inner and Outer London, is at odds with the above and places deliverability in jeopardy.

Jackie Redrup