

Thank you for the opportunity to comment on the Draft New London Plan. I am submitting these comments on behalf of Harefield Tenants and Residents Association (HTRA), in the London Borough of Hillingdon.

A sub-group of HTRA's Committee met on 22 February to discuss the Association's response and agreed the following points:

1. HTRA fully supports the response of Hillingdon Council and echoes its call for better recognition of the different needs and circumstances of outer London Boroughs. Harefield would go further still, being on the outer fringe of an outer London Borough, characterised as semi-rural in many aspects rather than suburban. We do not feel that the Draft Plan takes sufficient account of the real diversity of environments and communities that are found within Greater London and are concerned that it focuses too much on approaches that are relevant to highly urban environments.

2. We recognise that housing growth is required but echo Hillingdon Council's concerns about the assumptions and targets outlined in the Draft Plan, both in relation to the overall numbers and distribution and especially in relation to what constitutes a family home and how households are constituted these days. Our lived experience is that families' needs are constantly fluctuating as children grow up and move away temporarily for education or employment, move back again when those come to an end, or when grandparents are childcare providers or when elderly relatives can't live on their own. Employment contracts are often short term, low paid and often require a high level of mobility making it difficult for young adults to be confident about settling in one place and committing to a mortgage - affordable rented accommodation is a must for people in these circumstances, with a foothold back at the family home. We absolutely do not accept that a 2-bedroom dwelling can be considered a "family home". We are also concerned that prioritising redevelopment for housing over existing commercial uses risks eroding the local economy and turning places like Harefield into dormitory suburbs.

3. We are pleased to see an emphasis on protecting the Green Belt and Conservation Areas but feel that many elements of the Draft Plan are incompatible with this. For example, suggesting that gap sites should be developed, and that the approach should be to achieve higher density housing, such as small blocks of flats on a site that would traditionally have supported a larger family home. The Plan needs to recognise that sites that can look like gap sites often serve other valued local purposes, such as providing access to recreational land or informal community uses that contribute to quality of life. Increased housing density is only feasible in areas where infrastructure can support it - whether that is local transport, health and education services or something as simple as the physical width of the road. We feel that local authorities are best placed to understand these kind of considerations and the Draft Plan is insufficiently nuanced to deliver the protection goals it claims. Harefield's distinct identity as a village, its character and quality of life are all strongly associated with its Green Belt setting and Conservation Area status, and protecting these is a major priority for HTRA.

4. We note that a theme in the Draft Plan is to promote use of public transport and reduce reliance on private cars. This is laudable but again insufficiently nuanced for the needs of a place like Harefield. Our priorities are local connectivity, not necessarily journeys to and from central London. Our community is heavily reliant on private transport to get around the Borough for the daily business of life, accessing schools, health services, shops, and for work inside the Borough or in surrounding areas such as Watford. We have only 2 bus services, both serving Uxbridge for onward connection to the tube, with limited services in the evening. For train travel we are reliant on Chiltern Lines from Denham, outside the TFL Oyster and Freedom Pass area. Journeys are often complex, long and multi-person, making cycling or walking unfeasible even for a fit young adult, and

it should be noted that in this semi-rural area many roads do not have footpaths or safe cycling routes. Our local connections all involve use of busy roads with 50mph speed limits. Taking all this into consideration, any new housing development in this area must be allowed to incorporate adequate provision for parking, recognising that multi-car households are the norm. The 800m rule proposed in the plan is completely unsuitable for this area and is, furthermore, disadvantageous to people with restricted mobility. Harefield has a larger than average proportion of elderly residents.

5. We strongly support Hillingdon Council's resistance to attempts to create new definitions and interpretations for well established concepts and categorisations used in the planning context, such as Gypsy/Traveller status. and Green Belt policy wording. Consistency is extremely important in these matters so that everyone, both potential developers and interested parties, can know where they stand.

6. We are extremely surprised that there is no reference to HS2's impact on Hillingdon in the document. This new national infrastructure has major implications for outer London Boroughs as well as Central London, especially our part of Hillingdon. The impacts of this imposed project on our Green Belt, Conservation Areas, Sites of Special Scientific Interest and on our village as a whole is immense and will be permanent. We would expect a London Plan to take account of how nationally imposed project proposals will be addressed and managed and how their impacts will be balanced with other demands on local areas. Harefield currently feels under siege from externally imposed developments, each of which is treated in isolation with no consideration of cumulative or aggregated impacts. Our fear is that the London-wide plan as currently drafted looks like another source of external threat that prioritises wider perspectives over the quality of life of existing residents and visitors, undermining the scope for local authorities to intervene or mitigate impacts. This has been our experience with HS2, and is exacerbated with the lack of any provision of resources for monitoring and enforcement. The absence of reference to HS2 outside central London reinforces our perception that the plan is overly focused on inner London perspectives.

7. In similar vein we feel there is missed opportunity in the draft plan. An example is the reference to energy infrastructure needs. Harefield will be home to major new electricity infrastructure to serve HS2, and is currently undergoing numerous major utility diversions for HS2. No consideration is being given to how any of this work could be adapted or harnessed for current local improvement needs, or to future-proof local infrastructure for any increased local demand. The same applies to flood protection - efforts are being made to protect HS2 from flood risk and to minimise worsening of Harefield's current flood risk. No thought is being given to taking the opportunity to actually **improve** flood protection. We feel that this kind of approach ought to be at the heart of "good growth" - not just adding new development and attempting to minimise its harm, but actually improving what is already in place to make it all work better for everyone.

Thank you again for the opportunity to comment.

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on behalf of
Harefield Tenants and Residents Association