

DRAFT NEW LONDON PLAN

NORTHWOOD'S VOICE LTD
C/O NORTHWOOD COACHWORKS
STATION APPROACH
NORTHWOOD
MIDDLESEX
ENGLAND
HA6 2XN

Email: northwoodsvoice@gmail.com

Northwoods Voice Limited [NVL] is a limited company formed in January 2015.

The Objects of the Company are:-

- to protect the Area including the Town Centre Conservation Area in its entirety including the businesses in Green Lane and Station Approach within the TFL Estate (or any party to whom they dispose the land) from any development adversely affecting the Area for residents and businesses.
- to include effects on the Area by way of visual impact, noise, environmental degradation, road and/or other infrastructure work.
- we will not be raising any funds unless such occasion arises where there is no other alternative. We will engage with local experts/businesses and residents who have a vested interest in offering up their time and expertise to obtain the Company's objectives.-

Northwoods Voice Limited by this communication fully supports the submission made on the Draft London Plan, by the London Borough of Hillingdon [LBH].

Further comments from NVL are set out below.

Introduction.

NVL's major concern is clearly stated above in our "Objects" above.

Over the last number of years, as from 2008 as far as we can determine, TfL have had their estate in Northwood town centre, much of which lies in the Green Lane Conservation Area, identified for major property development. In more recent years TfL filed a Planning Application in December 2015 with LBH for this estate. TfL withdrew this planning application 71083/APP/2015/4037 on 5th September 2016. LBH Planning Officers had recommended refusal of the application. Before withdrawal the application was due to be heard by the Major Applications Committee on Sept. 13th 2016.

The approach taken in the Draft London Plan (published for public comment on 1st December 2017) will generally encourage further erosion of the character of Northwood and this is especially likely to impact directly or indirectly on the Town Centre Conservation Area, which principally concerns NVL.

The Draft London Plan appears to propose policies which are not consistent with the National Planning Policy Framework [NPPF] although our understanding is that the Draft London Plan should conform with the NPPF.

Chapter 1. Good Growth Policies.

In recent years activity in Northwood Town has appeared to decline, as indicated by local commercial (incl shopping) activity, although the population of the Town has increased. Many blocks of flats have been built over recent years and are still being built in or on the edges of the Town. In common with many other high streets around the country the use of internet shopping and large out-of-town retail outlets has impacted the Town negatively. So much for town planning. A distinct, separate, essentially residential development by TfL of their estate in the Town centre would further add to this trend of “densification”. None of this, in our opinion, represents “good growth policies”.

Chapter 2. Spatial Development Patterns

The building growth in the Town has appeared in recent times to have been largely opportunistic and has resulted in a crowded Town where traffic growth has become, NVL believes, a major issue for residents. This naturally also gives rise to parking issues and pollution issues. The Draft London Plan and its opportunistic higher-density policies seeks to make this worse, not better, by suggesting tall buildings, smaller living units, small extensions or unit developments in gardens. The extended denial of adequate parking arrangements is not an acceptable way, in our opinion, to encourage good growth in our suburban environment.

Chapter 3. Design

Previous TfL plans for redevelopment of their estate in the Northwood Green Lane Conservation Area have been submitted to LBH and eventually have been withdrawn by TfL for one reason or another. These TfL plans had been criticised by Historic England and other local Conservation bodies. Principally, the TfL plans to redevelop by pulling down existing heritage buildings and replacing them with blocks of tall, faceless structures have been the root of much local protest – notably the submission of a 3,000 signature local petition to 10 Downing Street in October 2015. The Draft London Plan would continue with, if not extend, this approach to densification rather than seeking to adapt or otherwise incorporate the heritage aspects of the Northwood Green Lane Conservation Area.

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, as far as we are aware, 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. Known as ‘Garden Grab’. This appears to conflict with NPPF policy. The consequences of such a policy would be to impact on

properties across the Town in an adverse way, but in particular possibly to impact on those properties closest to the Green Lane Conservation Area. Views across the Town centre would likely become mangled by the opportunistic building of small units, rather than by the professional approach hitherto of town planners.

Chapter 5 Social Infrastructure.

The growth of local schools in and adjacent to Northwood, both private and public, as we have seen with the general population increase in the Town, has put much perceived additional pressure on Town centre traffic systems, pollution, noise and consequentially probably, in our opinion, the safety of residents and school children.

The construction of any new development by TfL in the Green Lane Conservation Area will, in our opinion, be likely to worsen these aspects during the demolition and construction period (2 years or so ?) as well as afterwards. Comments by TfL's consultants in earlier TfL submissions show projected lengthening traffic queues despite the proposed introduction of shorter traffic light cycle times (itself a risk to pedestrians – including the young and old).

In short, packing yet more people into the Town Centre is going to tend, in our opinion, towards a break-down in social cohesion with increased crime likely to be a major concern. The policies within the Draft London Plan will encourage this adverse trend.

Chapter 6. Economy.

NVL fears that further increased densification and the likely provision of new retail outlets such as perhaps being indicated in the Draft London Plan and perhaps in future TfL plans for their Green Lane Conservation Area estate will be likely, in our opinion, to suck commercial investment and activity away from the rest of the Town and lead to an emptier high street elsewhere in the Town centre.

Chapter 7. Heritage & Culture.

Protecting heritage and culture of any community is of vital importance. To this end the Northwood Green Lane Conservation Area should be essentially preserved and enhanced. It has been threatened by earlier TfL planning applications and the measures indicated within the Draft London Plan would make this worse by further promoting “densification” and these measures are to be regretted. NVL note that the existing Northwood Station Car Park is not located within the Green Lane Conservation Area and future development in this location plus enhancements to Northwood Station itself (to provide Step Free Access) and to Station Approach (which does lie within the Green Lane Conservation Area and which leads to the existing Station Car Park) may be an acceptable development alternative for consideration.

Chapter 8 Green Infrastructure and Natural Environment.

NVL has noted, in earlier correspondence to, and meetings with LBH, that it is monitoring environmental pollution in the Green Lane Conservation Area and has been so doing for several years now. NVL have also noted to LBH the felling and cropping of numerous large trees by TfL alongside the Northwood Station Car Park – an action which in NVL's opinion is hardly consistent with promotion of a healthy Town Centre environment.

It must be stated that the Draft London Plan's proposals for green roofs/walls/roof gardens/extra street trees are not, in NVL's opinion, an appropriate substitute for existing gardens and the removal of existing town centre trees. Gardens, especially those in town centres, bring, in NVL's opinion, many advantages for biodiversity, flood risk control, improved air quality etc., which the Draft London Plan's proposals may well not bring.

Chapter 9. Sustainable Infrastructure.

The proposal for Green Walls is likely to add, in NVL's opinion, significantly to water use to keep these structures flourishing. They should be omitted from the plan as they are unlikely, in NVL's opinion, to achieve the desired effect of adequately improving air quality, instead are likely to be a waste of water and the maintenance of which may well fall onto local tax payers, although this detail is not stated in the Draft London Plan.

Chapter 10 Transport.

The Mayor appears to have had a vast number of improvement schemes for inner London, yet none for the suburbs. In fact NVL note the likely cessation of the TfL scheme for the Metropolitan Line northern extension to nearby Watford – although this is not noted in the Draft London Plan. This is to be regretted as it would have enhanced, in NVL's opinion, many aspects of Town activity.

The existing car parking provisions for Northwood are, in NVL's opinion, inadequate and have already, in our opinion, become a constraint on commercial (incl shopping) development in the Town Centre. The proposed densification of the Town Centre, in NVL's opinion, through measures such as are outlined in the Draft London Plan are likely to make these matters worse.

2nd March 2018