



West London Partnership

A New Plan for London

West London Response to the Consultation

Introduction

The West London Partnership (WLP) brings together the West London Alliance boroughs of Brent, Ealing, Hammersmith and Fulham, Harrow, Hillingdon and Harrow with the West London Business Chamber, West London Network for voluntary and community organisations and the LSC.

The WLP welcomes the opportunity to respond to this consultation on 'A New Plan for London' and to put forward proposals for policies in the draft London Plan to be published later in the year. Organisations in West London will be submitting individual responses to the policy proposals in 'A New Plan for London' and boroughs in particular are likely to address issues concerning policies with local impacts and with regard to the boundaries between policy in the London Plan and in local plans. London Councils has also submitted a response which sets out boroughs' general concerns and proposals. WLP is concerned with issues which have at least a multi-borough impact in West London and our response therefore focuses on these.

We also recognise that the proposals in 'A New Plan for London' are a preliminary stage in the drafting of the full London Plan and therefore as well as commenting on its contents we also raise issues which are not dealt with in it but which we would like to see in the full London Plan draft.

The WLP has published a West London Economic Development Strategy and a 10 Point Transport Plan for West London and these are relevant to informing spatial planning policy in West London. In addition, very recently the West London Partners have published responses to the Outer London Commission (OLC). West London also produced a response to Planning for a Better London. These documents and the OLC response (and subsequent submitted information on employment growth and transport) provide much of the basis for a response to A New Plan for London. Although technically not in Outer London our OLC responses were broadly inclusive some of the key spatial issues (as they impact on the West London sub-region) of the London Borough of Hammersmith and Fulham, located as it is at the nexus of our growth corridor proposal for West London. We do not intend to repeat the points made in them in these responses since the GLA is already in possession of them. However, it is appended to this document.

Chapter 2 We welcome the strong spatial emphasis to be given in the new London Plan and that the Plan will set out "in detail how the general policies in the new London Plan will affect, and be implemented in the range of places that make up London". We have argued strongly that West London has some important characteristics which differentiate it within London and merit, because of the size and scale of the area and its economy, specific and detailed policy attention equal to that which would be given if it were a city in its own right. We believe that this would be best for London as well as the sub-region. In particular we have argued that its economy should not be seen simply through the lens of London's role as a world financial and business centre, important though that is. Many of the economic drivers for West London derive from its accessibility to national, European and international markets for goods and services and to a skilled workforce and are largely independent of London's financial pre-eminence.

We also welcome the proposal to work with areas outside London; in our case most importantly with the Western Wedge/Thames Valley and the London – Luton- Bedford corridor (noting that its Brent Council's view that the latter should be re-branded as a North-West London – Luton / Watford – Bedford / Milton Keynes corridor). The WLP would be pleased to support this activity and contribute to it. However, such collaboration



requires clear objectives, a structured approach and good leadership and we would expect to see how this is to be achieved identified in the London Plan.

We endorse the approach to sub-regions and recognise the need for groups of boroughs and other agencies coming together for a particular purpose (London – Luton – Bedford corridor and the joint work between Hammersmith and Fulham and the Royal Borough of Kensington and Chelsea are examples of this working effectively in and around West London). However, to achieve its aims of recognising and addressing the spatial differences in London and effective monitoring and management the Mayor will need to work with groups of boroughs and other agencies which have the capacity and the governance to respond effectively, coherently and consistently and that is most likely to be the existing sub-regional borough and cross-sector partnerships, currently supported by both LDA and TfL. In West London this is the West London Alliance and the West London Partnership.

It is our view that before drafting the proposals for the a sub-regionally focused approach, and particularly with regard to managing and monitoring the London Plan, the GLA should engage with the sub-regional partnerships corresponding to the pattern in the Proposals, so that the draft London Plan sets out a practical and deliverable approach that adds real value to the achievement of spatial planning policy in London.

As indicated earlier we have already responded to the Outer London Commission which we were pleased to see the Mayor establish. Because many of the policies affecting place in the London Plan will be derived from the OLC interim recommendations we are concerned that we should have an opportunity to comment on its interim report at the same time as it is received by the Mayor so that we are able to have the same level of input into the draft of the London Plan as this consultation has allowed for other matters.

We support the approach to partnership working on the development of Opportunity Area Frameworks and the flexibilities that this offers. We note the proposal by LBHF and RBKC to designate the Earls Court/West Kensington/North Fulham area as a new Opportunity Area and by Ealing to consider Southall as a designation. In relation to the Heathrow area, given both its importance to the economy of West London but also its environmental impacts, we welcome the proposal for support for an integrated approach to Heathrow but we would like to see some clarity about the objectives and how this is to be implemented; recognising that there is already significant collaboration.

The Plan rightly acknowledges the role of boroughs and local strategic partnerships in community regeneration and sets out the intention, which we would support, to provide a strategic framework to support local community based regeneration activities. However, that framework needs to recognise the primacy of local leadership in tackling the issue and should also be sensitive to situation that the distribution of people living in deprivation and child poverty is widely spread and that there will be fact be very significant numbers of people in such a position living outside the regeneration areas and that their needs are also important. With regard to Town Centres, the achievement of balanced communities where there is a good supply of local employment across all sectors is important to their success (this was confirmed in the study 'Over the Edge' jointly produced with NLSA). Our response to the OLC emphasised this (and the relationship of transport investment to realising this objective). In West London we would welcome the opportunity to develop the capacity of town centres to succeed in employment terms through possible initiatives such as 'office quarters' and we look forward to the OLC report dealing with these issues.

On the matter of Strategic Industrial Locations we welcome the overall intention to protect the supply of industrial locations (our research which the GLA has seen demonstrates a higher rate of loss of employment land in the recent past than London Plan policy suggest should be happening); although we believe that there would be benefit on reconsidering this designation to better reflect the current and emerging needs for



employment land, including for green industries/waste processing etc. Within this overall approach we endorse the suggestion that within the overall strategic intent there should be local discretion for boroughs to manage on a criteria based approach the release for other uses of surplus or unsuitable capacity.

Chapter 3: We support the proposal to maximise the supply of new homes in London and the emphasis on the provision of larger family homes and intermediate housing. In particular, there is a high demand for intermediate renting and rent to purchase schemes. We note however that there is already a confusing array of intermediate options. Nevertheless the proposed increase to the income threshold for intermediate housing is particularly welcome in West London where average house prices are still significantly beyond the reach of many first time buyers.

We welcome the efforts being made to bring long term empty properties back into residential use.

On the matter of space standards we support the proposal for internal space standards for all sectors and welcome the proposed Housing Design Guide.

Chapter 4 In our response to the OLC we set out the importance of the West London economy and in a separate supplement indicated the business sectors and locations where above trend growth may be achieved. We also set out the distinctiveness of the West London economy. Based on that analysis we are concerned that there is not a stronger analysis of the approach to the economy and how the London Plan will support economic development across London. The only sectors mentioned in terms of growth are financial and business services but this does not properly reflect the potential growth sectors for West London – many of which are related to its locational advantages rather than as a result of the concentration of financial and business services in central London. Whilst we very much welcome policies that focus on SMEs needs we are concerned that in the case of West London this takes insufficient account of the areas' ability to also attract major HQ type investment, R&D, creative and other knowledge based industries. To achieve this type of employment growth the Plan should consider how to support the creation of locations which have the capacity to offer the business park/office quarter type locations, with good public transport connectivity, that will attract such investment. We are also of the view that the Proposals understate the opportunities in transport, logistics, food and leisure industries for employment growth, certainly in West London, and therefore they may not be sufficiently robust policies in the London Plan to support this.

Chapter 5 We welcome the intention to update data on waste arising and if necessary revise targets in the Plan and the policy approach to managing London's waste as far as practicable within its boundaries. We question if it is appropriate for the Plan, by proposing to move towards fewer, larger waste sites to effectively overlay strategy on a matter which should be informed by, and justified in, local development documents.

Chapter 6 We have set out our views on transport issues in West London in our 10 Point Transport Action Plan and in our response to the OLC (including the supplementary information provided). On the issue of parking we have argued for an element of local discretion for boroughs with regard to parking standards for new employment sites where public transport accessibility is not good and where the approach appropriately balances the benefits in terms of employment against the environmental disbenefits.

Chapter 8 Our comments in response to Chapter 2 relate in part to this chapter. We would also like to emphasise the importance (again set out in our OLC response) of effective implementation of the London Plan policies. We wish to see a collaborative approach to the implementation of the policies in the London plan which brings together as partners the GLA Group (London Plan, LDA and TfL) with the boroughs and other stakeholders (through the sub-regional working arrangements where that is appropriate) to plan and invest in the implementation of agreed policy. We are encouraged by the approach that TfL has adopted in this respect



to both planning (Regional Implementation Transport Plans) and joint working and to some extent by the work with the LDA on employability and worklessness at a sub-regional level. However, we would like to see a more structured approach with clear accountabilities, objectives and targets allied to a resourcing plan developed with the stakeholders. We have a concern which we have expressed in the past that the GLA may not be resourced to meet this challenge.

This level of collaboration needs to be extended to work with councils and regional agencies outside London and particular in the Thames Valley.

In connection with the management and monitoring of the London Plan we draw to the attention of the GLA the requirement being placed on boroughs to produce Local Economic Assessments (LEAs) and the current proposals being considered under PPS4. Through London Councils there is an in principle agreement that sub-regions will also produce Economic Assessments (which depending on their content some boroughs may chose to use as their LEA). Taking account of the emerging guidance from CLG on the content of Economic Assessments it may be helpful to consider how these sub-regional Economic Assessments, and the management arrangements to support them, may be aligned with the management and monitoring arrangements for the London Plan. It would be important to realise the synergies and to avoid duplication and wasted resources.