

OUTER LONDON COMMISSION – WEST LONDON SUBMISSION

1. This response is submitted by the West London Alliance, comprising the boroughs of Brent, Ealing, Hammersmith and Fulham, Harrow, Hillingdon and Hounslow.
2. The establishment of the Outer London Commission (OLC) is welcomed as a fulfilment of a manifesto pledge by the Mayor, reiterated in 'Planning for a better London' to which we responded positively. It is important recognition of the need to have clear and positive policies for Outer London.
3. We particularly welcome the recognition that the rate of employment growth in Outer London (indeed outside the Central Activity Zone) is a matter of serious concern that needs to be addressed. A spatial strategy for London which results in most employment growth continuing to be focused on the central area is not a sustainable model for the long term. It encourages lengthy commuting and has adverse impacts on the environment, including air quality, the use of resources and the general quality of life of residents.
4. We support a polycentric approach to development which promotes higher levels of employment growth outside the central area. This will result in shorter commuting trips, bring more economic, cultural and social activity to town centres and improve the quality of life of our communities. Our view is that generally it is better that people work within a reasonable distance of where they live.
5. The boroughs are committed this approach and to developing employment opportunities in West London in support of the London Plan and to achieve more sustainable, prosperous and vibrant communities. Right across the sub-region councils have been working with businesses, the development industry and local communities to secure new employment and investment, regenerate town centres and housing areas and tackled deprivation and disadvantage. There are numerous examples ranging from: Brent's regeneration of Wembley, Ealing's office corridor policy on Uxbridge Road which has resulted in new office floorspace being built out - both new build and refurbished - and its approach to Southall Gas Works; and White City regeneration in Hammersmith and Fulham. In Hounslow the borough adopted an Employment DPD one of the main purposes which was to implement the London Plan policies in relation to the management and protection of employment land. This has resulted in the identification of 36 industrial estates as being of local significance and affording them the same level of protection as the London Plan SELs. In terms of proposal sites and planning permissions granted in Hounslow on the Great West Road the B SkyB, Gillette site comprises 65,000 B1 floorspace and Wallis House and Alfa Laval provide for 25,000m² of employment floorspace and 30,000 m² of leisure including hotels. Chiswick Business Park is still being developed and will comprise 160,000m² of high spec business accommodation.
6. However, In West London existing London Plan policy (and that which preceded it) has not delivered the level of long term growth in employment in West London which is needed. Whilst it appears the number of businesses has increased (see Table 1, Appendix 1) the data we have suggests that whilst resident employment rates have remained about the same or improved, over the period since 1989 employment in most parts of Outer West London boroughs has not increased significantly, aside from in Hillingdon, and indeed in some boroughs has declined. (See Graph 1 in Appendix 1)

7. We therefore agree that a new policy approach is required to securing an increased level of employment growth in boroughs outside the central area of London and that we need to develop realistic and realisable policies that will deliver this.
8. We also think the Commission's focus should be to examine the basis for planning for economic growth anywhere outside the central activities zone. Inner London boroughs, outside the CAZ, have a particular role to play in the growth of London and their sub-regional sectors and there is a danger that this would be overlooked. Crucially, the future approach to growth of economic activity - and housing - must be allied to the way in which transport networks are developed and the need to minimise commuting and pressure on the system. That also requires a broader based consideration of the network outside the CAZ. The past pre-occupation with radial capacity into the CAZ to the near exclusion of all else has failed to exploit the potential for growth in inner and outer London, where improved orbital capacity is needed. These points are expanded upon later in this submission.

Understanding West London – its strengths and challenges

9. Outer London is not homogeneous and there are varying opportunities and challenges in each outer sub-region. (See Appendix 1 for key West London Data) West London's employment and business base is different to the rest of London and has many inherent strengths. It has its own economic structure which in some key respects, including a good existing range of business sectors and world class businesses and institutions (BSkyB, GSK, Cisco, Sony Ericsson, Carphone Warehouse, Diageo, British Airways, BBC, Brunel University and Hammersmith Hospitals for instance) and major assets in terms of leisure and tourism resources gives it a number of advantages to build on, which are different to other parts of outer London. (Table 2: Percentage of Employees by Sector Appendix 1 illustrates this).
10. West London therefore has the ability to offer employment growth across a range of sectors notably modern manufacturing, logistics, transport and communications (including Heathrow Airport), creative industries, bio-medical industries, green technologies and leisure and tourism as well as business services including facilities management because we have in the 'opportunity areas' the possibility of providing them with sites and premises – and that can include industrial and manufacturing industries. This gives West London the potential to develop further a balanced jobs market and a range of employment opportunities for residents, based on the sub-region's own characteristic of a variety of centres of economic activity and employment established along radial transport corridors, comprising a mix of town centres and clusters of business and employment along those corridors.
11. As regards the skills of its workforce, outer west London reveals a mixed picture: there are several areas with good qualifications but others where measures to increase skill levels need to be enhanced.
12. West London also possesses a relatively high degree of employment self-containment, when measured sub-regionally, with over 60% of its residents working in the five boroughs
13. This provides a strong basis for stimulating employment growth, in order to reduce travel to work and enhance sustainability.

14. West London has a strong advantage in its connectivity to both domestic and international markets. Particularly significant is its 'gateway' situation derived from Heathrow Airport, which has stimulated the growth of many globally-oriented companies, including those in the knowledge and advanced logistics sectors, together with the food and hospitality industries. Strong links with emerging markets have become apparent, notably the Indian sub-continent. Equally, the sub-region is very well connected to central London and provides highly accessible locations for business growth that depends on good access to the centre as well as Heathrow. This strength provides a platform for future growth if the right interventions can be secured.
15. It is however important to note that these connectivity and other advantages extend across the London boundary, where as shown later in this submission regional policy is active in exploiting them, notably at Slough and further west in the Reading area. Closer collaboration between the regional and sub-regional bodies is required in order to achieve a coordinated approach to mutual benefit.
16. There are important challenges to be addressed in West London. These include:-
- Road traffic congestion, which particular arises from the lack of appropriate public transport infrastructure for journeys not on the main radial routes¹, compromises business competitiveness and is a barrier to realising West London's business and employment potential (This is illustrated by responses to West London Business's Annual Business Sentiment Survey – see Appendix 2). Addressing West London's transport needs is key to creating the circumstances in which economic growth based on the above strengths can take place. We need to capitalise on our strong radial transport infrastructure around which employment growth will cluster and which serves our town centres, but, in order to increase the quality of life and sustainability of our centres and suburbs we need investment to ensure public transport accessibility to these radial routes. In West London this means much-improved "sub-regional radial spokes" from transport nodes (on our main radial transport routes) serving town centres and key employment areas.
 - There are parts of West London with persistent levels of worklessness and low skills which reduce the capacity of the workforce. Areas of deprivation occur in both larger concentrations, notably in southern parts of Brent and in small pockets spread across West London. In recent years this deprivation has been re-enforced. For example between 2004 and 2007 Brent has moved from being within the 25% most deprived local authorities in the country to within the 15% most deprived and 19 out of 21 wards became more deprived according to the Indices of Multiple Deprivation. Employment opportunities have also continued to decline in Brent and Hounslow up to 2007. We need an employment growth proposition that ensures that growth of opportunity is accessible to these residents most in need if we are to secure a sustainable and vibrant community in all parts of West London. Although transport is not a barrier to accessing employment per se, travel times and costs are.

¹ That is 'north-south' movements in West London whilst they have more of a 'east-west' characteristic in parts of the north of West London.

17. The above provides a context for considering the Commission's proposition of specifying a 'growth- or super-hub' as the way to expand West London's economy. If this means concentrating on one centre and on one (office) sector of economic growth we reject this, as not according with the structure and spatial distribution of economic activity in West London. Moreover it would be to the disbenefit of much of the people and businesses in the sub-region, who would not be in proximity to such a 'super-hub'.
18. Before explaining why the 'super-hub' concept is inappropriate in West London and putting forward a clear alternative, we make the following comments.

Impact of the Recession

19. The OLC's mission needs to be seen in how outer London can contribute to London's economic recovery and its sustained prosperity thereafter. This recession is much worse than previous cyclical downturns and is hitting London's financial and related service economy hard: in the future it is likely to be more tightly regulated and a diminished overall driver compared with the recent past. Sustainable recovery requires a more diverse London-wide economy, structurally – based on knowledge and technology (including emerging green technologies), and spatially – creating a real opportunity for outer London and West London in particular, if the right policies can be put in place to realise the inherent growth potential of our business sectors including knowledge-based activities. Employment projections need reappraising, based on the realities of 2009 and appraisal of opportunities going forward.

Why has outer London 'lagged behind'?

20. There are a number of reasons why employment in West London has not grown at the rate achieved in inner London and why in some areas there has been a reduction in the level of employment. Structurally, much of London's growth since 1985 has been driven by its increasing dominance in central global finance and business services; the 'back office' activities which decentralised to outer London centres have contracted through technological advance and outsourcing overseas, couple with the continuing decline in manufacturing activities located in outer London. Spatially, competitive office locations have shrunk, with only Croydon and the Brentford-Heathrow area (now including Uxbridge) standing out, while a lot (though not all) of the older stock is now obsolescent.
21. The GLA in its work on the London Plan Further Alterations modelled the relationship between public transport investment and employment growth and it is clear that in the past inner London's employment growth has been supported by very significant transport infrastructure investment in the central area and Thames Gateway. There has been no corresponding scale of investment in West London. Indeed businesses and investors regularly report that the lack of an appropriate public transport infrastructure in West London (inner and outer) and the resultant road congestion are a major disincentive to investment and business growth.
22. New forms of 'knowledge-based' economic activity have found more attractive competitive conditions beyond London, particularly in the Thames Valley and Surrey areas. We discuss this issue further in paragraph 30 below. The key issue for Outer West London is how it can reverse this apparent competitive disadvantage, so as to draw into West London more of these kinds of growth sector.

Locating Development: why the 'super-hub' concept won't work here

23. The key issue is what strategy for growing the Outer London economy and meeting the Mayor's laudable objective would best meet the circumstances of West London. The OLC has put forward the proposition of a 'Super or Growth Hub' in this regard. We strongly disagree, for the following reasons:
- it does not accord with the economic geography of West London's business development and employment;
 - benefits to West London as a whole cannot be demonstrated from such a proposition here;
 - the 'Heathrow area' proposed is inappropriate, even when judged on the definition of the features of a 'super-hub' that the OLC put forward, in lacking a single main centre with critical mass.
24. We justify this stance below.
25. To start with, we believe it essential to widen the debate beyond major office development and potential occupiers, important though that is, and give full attention to the potential of other economic development sectors that can be stimulated to grow the Outer West London economy. It is in identifying and promoting these sectors through policy and action programmes that a real difference can be made to the prosperity and employment of Outer West London. Pursuing this requires a comparison with the situation west of the London boundary, to which we return in paragraph 30 below.
26. West London is polycentric sub-region with a number of town centres, but none with the sort of critical mass to compare with Croydon in South London. Much of its economy is located along radial transport spines, where there are several major industrial and office clusters. Applying the 'super-hub' concept to this geography requires a leap of imagination to establish where it would achieve the benefits suggested by the Commission.
27. Circumstances in the Heathrow area are very different from the 'super-hubs' proposed in other sub-regions: the London Plan's 'opportunity area' is widely drawn with no clear focus outside the airport, but with a variety of separate development opportunities both to the north and south of the Airport, with their own potentials and needs. To be valid here, the 'super-hub' concept would require clarity about a number of matters, including:
- what its component 'offers' are (e.g. for offices);
 - what specific locations or nodes should be focused on (e.g. central Ealing, Brentford, Hayes, Southall, Hounslow, Feltham...);
 - how overall coherence can emerge;
 - how it would relate to and impact on other key west London centres, including the adequacy of transport links to them.
 - how clear benefits to west London generally can be demonstrated, creating a general uplift in prosperity and reducing worklessness.
 - finally, there is a danger that the scale of investment required to make the concept work in this situation would draw resources (e.g. for transport) away from other West London locations with potential.
28. We conclude that these matters cannot be addressed satisfactorily here.

29. We also have concerns about the evidence base that the OLC may be using with regard to the assessment of transport options for alternative growth scenarios including 'super-hubs'. This data has not been made widely available but from a recent presentation on some of this work it would seem to be high level, in the case of West London did not model either the proposal in the OLC paper at Heathrow or what we would regard (and set out in this submission) as a reasonable alternative proposal. Moreover, we welcome the current work that TfL is doing to deepen and improve its transport modelling in the London. We understand that this is because the current transport model is not robust for transport modelling other than at the London-wide level. Given the acknowledged fundamental importance of transport investment to the success of employment growth policies we feel it is essential that proposals emanating from the OLC are developed on the basis of appropriate and robust transport modelling.

The Growth Corridor alternative

30. We therefore conclude that this is not an appropriate strategy for West London, and propose an alternative. This is based on its inherent geography of radial transport corridors and developing a strategy which maximises the key development opportunities along them. Four broad radial corridors can be considered:

- M4/Great Western Rail/Uxbridge Road, extending from Hammersmith and Earls Court through Ealing; Southall and north of Heathrow via Hayes and Stockley Park beyond London to Slough (importantly also the alignment for the Crossrail Route);
- A4/A30/South West Rail, diverging from the above at Brentford through Hounslow and Feltham, and beyond to Staines;
- A40/rail corridor from White City, Park Royal and Old Oak via Perivale and Northolt out to Uxbridge,
- North-west rail corridor from Willesden junction (also underground lines) to Wembley and Harrow, continuing to Watford; related to the A5/M1 North West London corridor.

31. These corridors form the London Plan's 'Western Wedge' concept: see paragraph 40 below

32. Although Hammersmith and Fulham is not within the definition of Outer London used by the OLC, the borough forms the nexus of some of the radial growth corridors, is a significant location for businesses and has major employment opportunity sites adjacent to or linked with outer West London boroughs. There is north-south connectivity – arguably a 'West London Line corridor' – linking Hammersmith & Fulham, Central & Bakerloo Lines, North London Line, Willesden Junction and Wembley and bringing in regional connections to Gatwick, Watford Junction, Milton Keynes, West Coast main line. While Hammersmith and Fulham borough has strong links with central London it also has a significant relationship with Outer West London. OLC policy proposals need to take build on this.

33. The London Plan metropolitan and major town centres, 'opportunity areas' and nearly all its 'strategic industrial locations' occur within these radial transport corridors and their nexus in inner West London. The four corridors therefore encompass the main development opportunity locations in West London. The key point is the way they can relate together, along the transport spines, providing a basis for generating critical mass and mutually-reinforcing interaction between them. <I didn't find this fully convincing. I think we should list the Opportunity Areas and show how these Opportunity Areas are linked to these four

radial corridors. I also think that the Heathrow hub is not on any of these corridors and so should be explicitly mentioned in the text.>

34. This analysis recognises the existing economic geography of West London reflects past private sector investment decisions and builds on the current radial transport infrastructure. It has the benefit of offering a significant number of business investment and employment opportunity sites for a range of sectors including logistics, modern manufacturing, creative and other knowledge-based businesses and jobs, and for small as well as large firms. The existing opportunity areas (Heathrow and White City/Park Royal/Wembley) already contain significant agglomerations of businesses and there is scope to build on this. This extensive and spatially balanced offer contrasts with the 'super-hub' concept which would focus on opportunities for large commercial business in concentrated form, thus offering a more restricted range of employment opportunity for residents.
35. The town centres and other employment sites along the corridors can exploit the investment being made in increasing capacity on the radial routes by TfL including, at its interchanges, through the Crossrail scheme, notably at Ealing, Southall, Hayes and Harlington. But for West London's town centres to thrive and improve business competitiveness and the environmental quality of West London there have to be reductions in traffic congestion. Policy and investment proposals need to be made by the OLC for better public transport sub-regional radial 'spoke' provision to nodal interchanges on these main radial routes, thereby linking the suburban residential areas and district and local centres more effectively to the growth in the town centres and employment sites in the corridors² This approach will address the congestion, arising from short and longer distance car trips, faced by businesses.
36. Investment in the short and medium term in these sub-regional radial routes serving town centres and key employment areas is most likely to take the form of improved bus services, including express buses where appropriate, and in better and more imaginative use of existing heavy rail overground and underground lines.
37. **Town Centres** We ask the OLC to give full recognition to the potential of West London's main town centres as focuses of growth. While the sub-region has no dominant centre, it is notable that all of its 'metropolitan' (Ealing, Harrow, Hounslow and Uxbridge and taking into account Hammersmith and Fulham, potentially Shepherds Bush) and 'major' (including Wembley, Chiswick, Southall and Hammersmith) centres are key nodal points within the Corridors. Therefore the growth corridor approach would promote mixed employment and residential growth at Outer West London town centres. The Borough Councils are taking forward active proposals (through their Local Development Framework preparation etc.) to realise the employment potential and enhance the vitality of their town centres, working with property interests, notably at Ealing, Harrow, Wembley, Uxbridge and Hammersmith, ready for the upturn. The approach would contribute to securing Harrow's place as a metropolitan centre. The OLC should pay specific attention to the south-western corridor, to promote improvements to the vitality and condition of Hounslow town centre. Some district centres are well positioned to act as growth nodes, notably Feltham where

In West London north-south links to employment areas and town centres may be a better way of describing the function of the 'orbital links' which our 10 Point Action Plan calls for.

development plans are proceeding, and Hayes which could become a significant transport and development hub leveraging Crossrail. We ask the OLC to take this fully into account in making their recommendations as regards West London.

38. In considering this, we draw the Commission's attention to the report by URBED 'Over the Edge?- Town centres and the London Economy', research commissioned jointly by the West and North London sub-regional bodies. This indicated the measures needed to realise the potential of the outer town centres, relative to those beyond the London boundary.
39. The OLC should consider the implications of the proposed Brent Cross-Cricklewood super-hub (which is based on a large agreed development project yet to proceed) close to the West London sub-region, particularly for the Wembley area. While transport connectivity between the two locations is poor and it could be said that their respective development 'offers' are different, both lie within the London Plan's 'London to Luton Coordination Corridor', albeit on separate radial transport spines.

Other Key Points

Comparison with areas west of the London boundary

40. Picking up the point made in paragraph 22 above, it is essential to consider the situation across the London boundary and understand why the Outer West London economy has grown significantly slower than the very buoyant economy further west, particularly in the Thames Valley areas. These benefit from a relatively recently-developed office-based economy compared with West London: many of the new forms of knowledge-based, research-led and high value-added sectors have preferred to locate here, including inward investment. Reasons are: connectivity to highly skilled workforce; strategic accessibility nationally (via Motorways) and internationally (Heathrow); high quality environment and quality of life in attractive towns in and beyond the Green Belt; availability of quality accessible business park locations with favourable parking provision together with (as the policy tide has turned against out-of-centre locations) site availability at well-located town centre public transport hubs, particularly Reading; reinforcing development of sectoral clusters sustaining growth.
41. The situation facing this rapidly expanding 'new' economy was considered at the Examination-in-Public into the draft South East regional Plan (*see Panel report, August 2007, Western Corridor and Blackwater Valley Sub Region*). The dynamism has been such that growing labour market imbalance was recognised, with forecast employment growth (7,900 p.a. 2006-16) well in excess of workforce growth. This would impact adversely on the sub-region's competitive position.
42. The South East Plan (*Government Proposed Changes, July 2008*) proposes an uplift in housing provision as a way of addressing this imbalance. It also notes (paragraph 21.10) "Given the complex inter-relationship (*with London*) it will be important for there to be compatible cross-boundary monitoring of land and labour supply". A strong and proactive policy is included on employment land, including "if existing land is judged to be insufficient, new areas of employment land will be identified in DPDs". Economic development policies promote a culture of innovation in the development of new products and services in the 'knowledge economy'. This is in concert with SEEDA's Regional Economic Strategy 2006-16 which has a clear policy and action framework to this effect, working with

business partnerships, particularly evident in its spatial 'Diamonds for Investment and Growth' programme, which includes the Reading area (*pages 56 on*).

43. Noting this, the Commission is asked to consider how the growth sectors which have hitherto preferred locations there can be attracted to Outer West London. We contend that this can occur at the nodal locations (providing a choice) along the transport corridors we put forward. It will require appropriate location-specific interventions between the GLA Group and the boroughs/sub-regional partnerships. This would replicate, in our circumstances, the policy and action framework apparent in the adjacent part of the South East region. Embracing varying scales of business activity and employment, in our judgement this would be a much more effective strategy than relying on one (artificial in West London) super-hub with its focus on large-scale occupiers.
44. This approach would give effect (which has not so far occurred) to the London Plan's inter-regional intentions in its 'Western Wedge' concept, as set out in Policy 1.3 and paragraph 1.25, and Policy 5F.1 last bullet point and paragraph 5.158, regarding development coordination and joint working across the regional boundary
45. **Innovation** Leading on from the above, we ask that the OLC recommends that there should be much stronger policy and action to stimulate the development of business and employment in knowledge-based innovative industries and services, to at least match the emphasis given to this in the adjoining South East region, so that Outer West London gains an increasing share of this important source of future growth. There should be a clear strategy to expand considerably upon West London's existing base of industry in the knowledge, high value-added and creative sector. . This requires more positive intervention by the LDA including targeted support for such business growth, to match and exceed that in place by SEEDA beyond London. It can include establishing links with research institutions such as Imperial College and Brunel University.
46. **Employment Land and Premises** New policy emphasis needs to be given to securing and sustaining a high quality offer in this respect. West London has a wide spread of industrial land 'offer' of a brownfield redevelopment type along the growth corridors, but policy attention is needed to whether at present it is sufficiently attractive for competitive business development, particularly in competition with locations to the west of London which have done better in achieving property and business investment (e.g. comparing the Southall-Hayes-West Drayton area with Slough). While the existing base of sites, retained through the London Plan's 'Strategic Industrial Locations' can go some way, interventions are needed to upgrade selected locations, particularly to create desirable sites for new innovative industries and inward investment. There could be advantages in one or two new accessible and environmentally attractive locations for 'innovation business parks' being identified. If London Plan policy is to increase the rate of employment growth in Outer London, then in Outer West London further policy consideration will need to be given to ensuring that there is a sufficient stock of employment land retained and that this is not eroded by its gradual loss to higher value residential uses.
47. **Housing:** West London has capacity for at least 40,000 new dwellings to 2017. The form, size and tenure of these needs to be related to economic development strategy, to ensure that the right sort of housing is provided to match the kind of business growth in prospect. The fulfilment of this capacity can only be achieved by the kind and scale of transport

infrastructure investment we propose to secure the employment growth and investment which we describe above.

39. **Suburban quality of life** is critical, in terms of residential attractiveness as a competitive advantage in securing economic development. Social changes need to be recognised, including propensity to move out of London. West London's attractive suburbs need to be protected from intensification that would erode their character; others need improvement. More can be made of open space assets. There can be a 'virtuous circle' of economic, housing and environmental action.
48. We are concerned that the considerations of the OLC to date have not fully addressed the wider issue of ensuring sustainable communities in Outer London. By 2031 most of the suburbs will be over 100 years old and the maintenance of them and the vitality of the suburban living environment needs to be addressed. A good quality environment is important to employers in the impact that this has on attracting and retaining a local workforce. We refer the OLC to the work and report of the London Council's Suburbs Steering Group as an appropriate starting point for this wider consideration of the suburban issues.³
49. As well as considering the future potential of employment and metropolitan town centres the issues of Outer London's local and district centres need consideration. The London Councils report highlights the changing needs and lifestyles of residents within the suburbs and how this is an "opportune time to re-think how people might want to shop at local or district centres." The OLC in a comprehensive consideration of Outer London should reflect on how some of the good practice developed by boroughs in upgrading district and local centres can be supported by the London Plan and by the GLA group. For instance, Hillingdon's new approach to upgrading the borough's town centres and supporting their sustainability involves bringing together budgets from a range of sources including Highways Maintenance, Street Scene, etc and external support from Transport for London. Northwood (Green Lane) was the first centre to benefit from this initiative. Other West London boroughs are also active in developing new approaches.

Existing Strategy and Data Sources

50. The Commission's attention is drawn to the West London Economic Development Strategy, the West London 10 Point Transport Plan, the Orbital Links transport strategy currently under way and the employment land research done over the last 3 years. In addition, the Business Sentiment Survey (now in its second year) by West London Business (WLB) for the West London Partnership and the inward investment and business retention data held by WLB will be of value. Data for Outer West London is set out in the attached annex, particularly on business investment and employment trends.

Requests to the Commission arising from the above

51. We ask the Commission to accept our vision for Outer West London, which is to grow its economy through realising the potential of our substantial development opportunities,

³ London Councils' "Successful Suburbs – the case for investment in London's suburban communities" March 2009

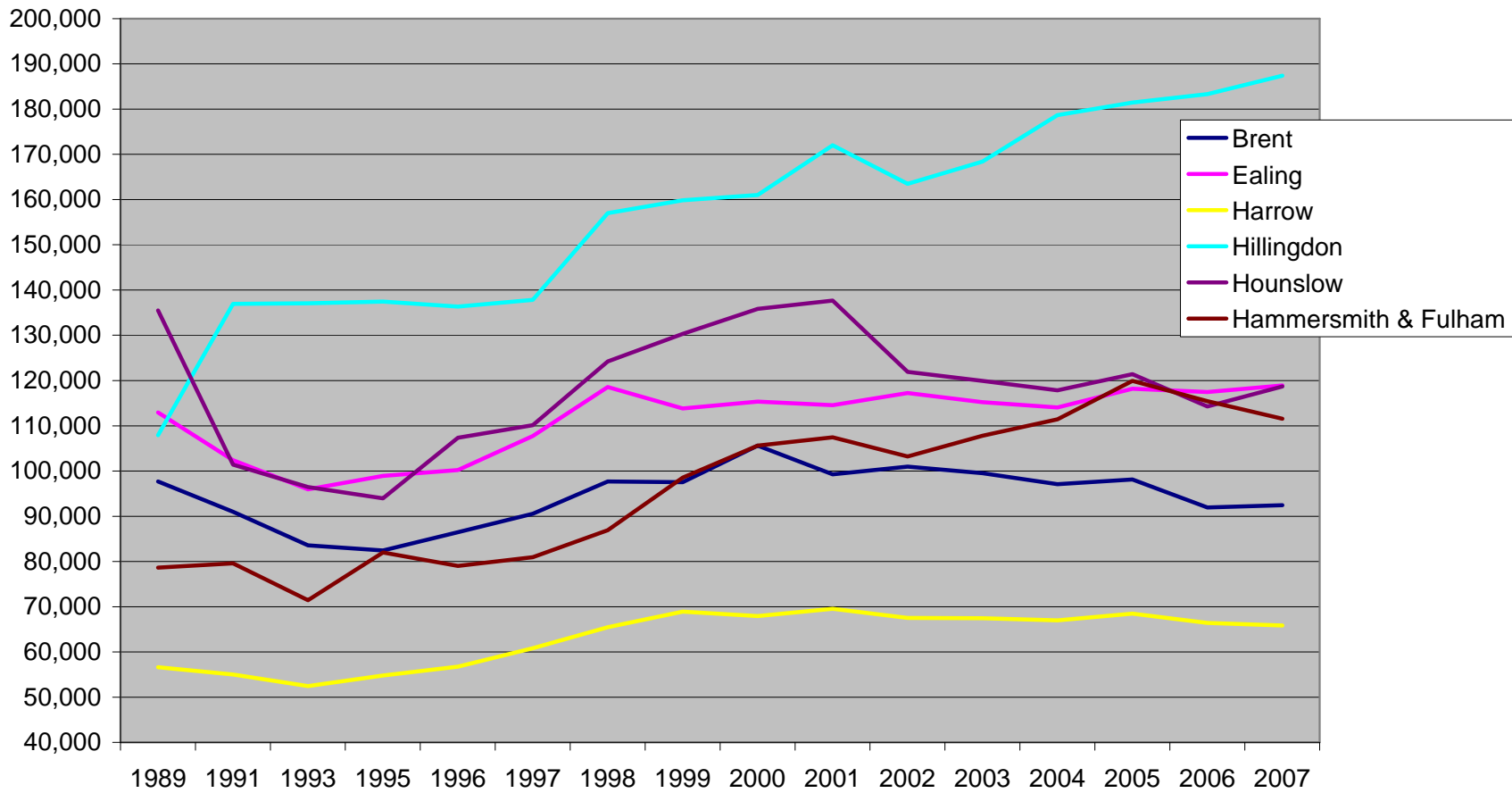
which are at centres and nodes along radial transport spines. These provide major scope for business and employment generation ranging from mainstream offices to innovative and creative industries to supply-chain activities to tourism, leisure and retail development, accessible to the whole Outer West London population.

52. The Commission is giving the impression that the only potential growth sector is large-scale office development to be focused on a 'super-hub'. We ask the OLC to take a full view of other potential growth sectors which can be stimulated in Outer West London, taking account of its existing economic structure and strengths, and which can be spread more widely across the area reflecting the spread of development opportunities.
53. No single location with capacity or accessibility to accommodate very large-scale office development and associated residential development as is the case at the super-hubs envisaged elsewhere is apparent here. We ask the Commission to reflect on our development geography, and discuss with us how investment, particularly in public transport, can be related to these opportunities, firstly to promote their fitness for purpose, and secondly so that employment generated there can be gained across Outer West London.
45. Given the link already established by the GLA between public transport infrastructure investment and employment growth we specifically seek investment in sub-regional radial public transport spokes to our main radial transport system to support employment growth in town centres and employment areas; leveraging existing and planned infrastructure (e.g. CrossRail) where appropriate. Extension of these radial spokes could determine selective routes that meet orbital journey gaps in suitably attractive public transport e.g. Wembley – Park Royal – Acton Main Line – South Acton
46. Considering the broader London approach we seek an assurance that if the London Plan were to endorse super-hubs in other sub-regions the resulting focus of transport investment on them over and above that already planned in order to deliver their additional impact should not be to the detriment of transport infrastructure investment in West London' employment growth with its very different economic geography.
47. Recognising that significant transport infrastructure investment will be a long term approach we propose that the OLC consider recommending that in the London Plan Outer West London (and indeed Outer London) boroughs are given more flexibility (at least in the shorter term) in setting planning policy reflect local circumstances. This would facilitate them to secure higher levels of employment growth and enable them to overcome some of the competitive disadvantage that they suffer in comparison with inner London and the Outer Metropolitan Area. In particular, we have in mind enabling the boroughs to set parking policy for developments to meet the sub-regions' requirements and situation. In this regard we welcome the emerging policy thinking in Para 174 of "A New Plan for London".
48. Whilst acknowledging this latter approach may have an marginal adverse impact on traffic congestion we would like to see this balanced and mitigated by consideration being given by TfL to extending right across West London travel demand management approaches such as personalised travel planning, investing more in supporting cycling and walking (particularly to town centres) and innovative pricing policies for outer zone public transport travel which acknowledge that the lower density/frequency of provision means that greater incentives are required to achieve modal shift.

49. Outer west London has benefited little from policy and action by the GLA Group (specifically TfL and LDA) corporately, except at Wembley and Park Royal, to secure investment in employment sites. The spread out London Plan Heathrow Opportunity Area has not been taken forward in the way envisaged. Boroughs have been and are pursuing their own plans and initiatives as best they can. Therefore we would want to see a more concerted approach to by the GLA group to support the execution and realisation of the London Plan policy for Outer London.
50. This paucity of regional action contrasts with the positive policy framework and action programmes in place by the regional bodies in the adjoining parts of the South East. This discrepancy disadvantages Outer West London. We ask the Commission to recommend that the new London Plan, together with the new LDA Strategy and the Mayor's new Transport Strategy, create a similarly proactive policy and delivery framework which removes this disadvantage. Boroughs would have a greater ability to support this endeavour if the Mayor were to support a proposal for the boroughs to an element of control over the business rate.
54. The OLC should also address the issue that to achieve the intended outcome of the policies to increase employment growth outside central London effective measures will need to be put into place to ensure that residents are able to access these employment opportunities. This will require concerted policies and interventions working with employers and boroughs (including the co-ordination of the programmes of the London-wide agencies with those in the sub-region - LSEB and funders collaborating with WLA boroughs/West London Working). In West London we have a considerable range of experience to share with the OLC on measures to assist residents access employment (for instance successful schemes at Heathrow and White City, in Wembley and through borough apprenticeship programmes)

Appendix 1 - Data

West London Employees 1989 - 2007



Appendix 1 - Data

Table 1 Business Growth – Businesses

| Area | Businesses 1989 | Businesses 2007 | Growth 1989- 2007 |
|----------------------|--------------------|--------------------|----------------------|
| Brent | 5,977 | 11,338 | 90% |
| Ealing | 6,060 | 13,480 | 122% |
| Harrow | 4,212 | 9,679 | 130% |
| Hillingdon | 5,355 | 10,642 | 99% |
| Hounslow | 5,083 | 9,863 | 94% |
| OWL | 26,687 | 55,002 | 106% |
| Greater London | 189,163 | 387,123 | 105% |
| Inner London | 89,448 | 189,100 | 111% |
| Rest of Outer London | 73,028 | 143,021 | 96% |

source: ABI 2007, Census of Employment 1989

Table 2 Percentage of Employees by Sector (source ABI 2007)

| Area | Manufacturing | Construction | Distribution Hotels & Restaurant | Transport & Comms | Banking & Finance | Public Admin, Educ & Health | Other Services |
|----------------|---------------|--------------|--|----------------------|----------------------|--------------------------------|----------------|
| Brent | 10.5% | 5.4% | 28.7% | 8.9% | 15.9% | 24.5% | 6.0% |
| Ealing | 9.1% | 3.3% | 29.2% | 8.5% | 24.3% | 20.6% | 4.8% |
| Harrow | 5.8% | 7.3% | 22.8% | 4.0% | 24.7% | 28.1% | 7.1% |
| Hillingdon | 4.0% | 3.9% | 21.0% | 34.8% | 19.4% | 14.2% | 2.3% |
| Hounslow | 3.6% | 3.3% | 24.7% | 14.8% | 25.9% | 17.3% | 10.1% |
| OWL | 6.2% | 1.0% | 24.9% | 17.8% | 21.8% | 19.4% | 5.5% |
| Greater London | 4.5% | 3.0% | 21.0% | 7.4% | 34.3% | 22.4% | 7.1% |

Appendix 1 - Data

Table 3 Percentage of Employment by Business Size

| Area | 1-4 employees | 5-10 employees | 11-49 employees | 50-199 employees | 200 or more employees |
|----------------------|---------------|----------------|-----------------|------------------|-----------------------|
| Brent | 15.6% | 9.8% | 22.4% | 23.2% | 29.0% |
| Ealing | 14.4% | 8.8% | 22.2% | 24.4% | 30.1% |
| Harrow | 19.3% | 10.8% | 22.1% | 22.5% | 25.2% |
| Hillingdon | 6.8% | 5.3% | 13.5% | 21.0% | 53.5% |
| Hounslow | 10.2% | 7.4% | 19.4% | 24.5% | 38.5% |
| OWL | 11.8% | 7.8% | 18.9% | 22.9% | 38.6% |
| Greater London | 11.9% | 8.2% | 20.3% | 22.2% | 37.5% |
| Inner London | 11.2% | 8.0% | 20.2% | 18.9% | 41.8% |
| Rest of Outer London | 13.5% | 8.9% | 21.6% | 23.4% | 32.6% |

Table 4 Qualifications: Working Age

| Area | % with NVQ1+ | % with NVQ2+ | % with NVQ3+ | % with NVQ4+ |
|----------------|--------------|--------------|--------------|--------------|
| Brent | 55 | 48 | 36 | 27 |
| Ealing | 66 | 59 | 50 | 38 |
| Harrow | 71 | 62 | 49 | 34 |
| Hillingdon | 71 | 56 | 41 | 25 |
| Hounslow | 68 | 57 | 45 | 34 |
| OWL total | 66 | 56 | 44 | 32 |
| Greater London | 73 | 63 | 51 | 37 |
| UK | 78 | 65 | 46 | 29 |

source: Annual Population Survey Jan - Dec 2007

Appendix –2 – West London Business Chamber Information

Evidence of factors which have influenced inward investors in Outer West London

- Access to markets/clients
- Quality of life
- Proximity of Heathrow
- Local or regional transport links

Source: West London Business Sentiment Survey (2008: 4)

Evidence of what factors have deterred inward investors from locating in Outer West London

- Cost of quality commercial property
- Parking restrictions
- Traffic congestion – staff access
- Lack of Brown-Field development
- Lack of London government funding and support

Issues affecting business retention in Outer West London

- Traffic congestion
- Lack of planning flexibility
- Shortage of certain skill levels (NVQ II)
- Parking permissions
- Lack of competitively priced manufacturing and industrial sites
- Lack of Borough engagement

Locational factors within Outer West London – what influences where businesses locate in Outer West London

- What their key markets are
- Cost
- Clustering (e.g. Park Royal – Food; White City, Chiswick Park – Media/Creative Industries)
- Type of labour force needed (e.g. Raytheon – close proximity to Brunel University)
- Quality of life factors