



# STRATEGIC PLANNING ADVISORY PANEL SPECIAL

**THURSDAY 29 SEPTEMBER 2005  
8.15 PM**

**PANEL AGENDA (ADVISORY)**

**COMMITTEE ROOM 6,  
HARROW CIVIC CENTRE**

**MEMBERSHIP (Quorum 3)**

**Chair: Councillor Burchell**

**Councillors:**

**Idaikkadar  
N Shah  
Anne Whitehead (VC)**

**Marilyn Ashton  
Mrs Bath  
Mrs Kinnear**

**Co-opted Member: Councillor John Branch**

**Reserve Members:**

**1. Blann  
2. Bluston  
3. Ray  
4. Miles**

**1. Kara  
2. Versallion  
3. Harriss**

**Issued by the Democratic Services Section,  
Legal Services Department**

**Contact: Kate Boulter, Committee Administrator  
Tel: 020 8424 1269 E-mail: kate.boulter@harrow.gov.uk**

***NOTE FOR THOSE ATTENDING THE MEETING:  
IF YOU WISH TO DISPOSE OF THIS AGENDA, PLEASE LEAVE IT BEHIND AFTER THE MEETING.  
IT WILL BE COLLECTED FOR RECYCLING.***

**HARROW COUNCIL**

**STRATEGIC PLANNING ADVISORY PANEL SPECIAL**

**THURSDAY 29 SEPTEMBER 2005**

**AGENDA - PART I**

1. **Attendance by Reserve Members:**

To note the attendance at this meeting of any duly appointed Reserve Members.

Reserve Members may attend meetings:-

- (i) to take the place of an ordinary Member for whom they are a reserve;
- (ii) where the ordinary Member will be absent for the whole of the meeting; and
- (iii) after notifying the Chair at the start of the meeting.

2. **Declarations of Interest:**

To receive declarations of personal or prejudicial interests, arising from business to be transacted at this meeting, from all Members present.

3. **Arrangement of Agenda:**

To consider whether any of the items listed on the agenda should be considered with the press and public excluded on the grounds that it is thought likely, in view of the nature of the business to be transacted, that there would be disclosure of confidential information in breach of an obligation of confidence or of exempt information as defined in the Local Government (Access to Information) Act 1985.

4. **Minutes:**

To agree that the minutes of the meeting held on 13 September 2005 be deferred until the next ordinary meeting of the Committee.

5. **Public Questions:**

To receive questions (if any) from local residents or organisations under the provisions of Advisory Panel and Consultative Forum Procedure Rule 15 (Part 4E of the Constitution).

6. **Petitions:**

To receive petitions (if any) submitted by members of the public/Councillors under the provisions of Advisory Panel and Consultative Forum Procedure Rule 13 (Part 4E of the Constitution).

7. **Deputations:**

To receive deputations (if any) under the provisions of Advisory Panel and Consultative Forum Procedure Rule 14 (Part 4E of the Constitution).

8. **Consultation on the West London Sub-regional Development Framework (SRDF) - Harrow Council's Response:** (Pages 1 - 20)

Report of the Director of Strategic Planning.

**AGENDA - PART II (PRESS AND PUBLIC EXCLUDED) - NIL**

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Meeting:	Strategic Planning Advisory Panel
Date:	29 <sup>th</sup> September 2005
Subject:	Consultation on the West London Sub-regional Development Framework (SRDF) – Harrow Council’s Response
Responsible Officer:	Graham Jones
Contact Officer:	Claire Codling/Dennis Varcoe
Portfolio Holder:	Keith Burchell
Key Decision:	Approval of the Response
Status:	Part 1

### **Section 1: Summary**

Prior to the July 13<sup>th</sup> SPAP meeting, members were circulated with a report outlining the background to the development of the West London SRDF (Appendix 1)

### **Decision Required**

Approval of the Harrow Response

### **Reason for report**

The West London SRDF was launched by the Greater London Authority on the 4<sup>th</sup> July 2005 for formal consultation.

Whilst a detailed West London Partnership response is being prepared, there are however a few issues that warrant a separate Harrow response being also submitted.

## Benefits

Opportunity to influence the final GLA document and spatial planning and related matters until 2016, and to also inform the development of the Harrow Local Development Framework (LDF) in Harrow.

## Cost of Proposals

Costs will need to be contained within existing and future budgets unless further funding is allocated by the GLA for specific initiatives e.g monitoring changes in land use.

## Risks

No major risks are associated with this report

## Implications if recommendations rejected

- Harrow views not identified
- Harrow issues not raised with the GLA
- Plans impacting on Harrow not raised with Planners and Members
- Harrow loses the opportunity to influence the final document

## Section 2: Report

### Brief History

Members are reminded of the report prepared for the 13<sup>th</sup> July (Appendix 1) which provided the background to the development of the WL SRDF. Prior to the meeting members were sent a hard copy of the WL SRDF. Since this meeting was held a separate member's briefing was convened on 11<sup>th</sup> August, to ensure that members had the opportunity to a fuller briefing on the content of the document.

Introduction to the Draft Harrow Response

### *Harrow's Role in the sub-region*

Given Harrow's particular characteristics, it is unsurprising that the Borough does not feature particularly prominently in the sub-regional picture (for example Harrow does not have any 'Opportunity Areas'). This should not be seen as diminishing from Harrow's valuable contribution towards achieving more

sustainable communities in West London and London. However, given the characteristics of Harrow as a borough, attempting to raise Harrows' profile within the SRDF context presents a challenge.

The draft response has been used to raise the need to:-

- Reinforce points made on the role and status of the SRDF in the WLP response
- Discuss the sub-region's boundary
- Draw attention to the development of Harrow town centre
- Make specific points about; sport, culture and tourism
- Suggest that the role of district centres as part of suburban neighbourhoods needs consideration in the proposed London Plan review
- Highlight particular difficulties in orbital travel from North to South
- Suggest that outer London borough's employment concerns need further consideration
- Question the statistics used in detailing Harrow's affordable housing and nursery provision

#### Options considered

It was decided that although Harrow has been taking a leading role in developing the West London Partnership SRDF response, that it would also be opportune to write a short Harrow response on pertinent issues, which this SPAP report is seeking to approve. The points it makes are largely in addition to those made in the West London Partnership Response. Therefore a summary of the first draft of the WLP response is also included as appendix 2, so that members can see the scope and direction of the WLP response and view this in conjunction with the Harrow response. (A later version of the WLP response is being taken to the 6<sup>th</sup> October cabinet meeting via CMT and PHB, after it have first been checked thoroughly by the officers concerned)

#### Consultation

A large cross council meeting was held on July 21<sup>st</sup> to gain the views of officers on the details within the document. This has been followed by meetings with individual officers to ensure that the response from Harrow has been developed from feedback across departments.

As the WL SRDF is a GLA document they are also carrying out their own consultation process.

#### Financial Implications

None

Legal Implications

None (check back to Jessica)

Equalities Impact

Each SRDF will also be subjected to a Strategic Impact Assessment, carried out by external consultants with support from the boroughs which will include evaluating whether the Framework has addressed equalities issues sufficiently.

The final Harrow Response will be forwarded to the GLA, together with, it is expected, an endorsement of the WLP Response by the 25<sup>th</sup> October 2005.

**Section 3: Supporting Information/ Background Documents**

Appendices

Appendix 1 – SPAP report July 13<sup>th</sup>

Appendix 2 - Summary or the first draft of the WLP Response

Appendix 3 - Draft Harrow Response

West London SRDF – which can be down loaded from the GLA website:  
[www.london.gov.uk](http://www.london.gov.uk)



## **Draft Harrow Response**

### **WL SRDF**

Harrow Council would like to thank the Greater London Authority for the opportunity to contribute to the development of the West London's Sub-Regional Development Framework (WL SRDF) and to be part of the consultation process on the draft document launched in July 2005.

### **Harrow's Role in the Process**

The Chief Executive of the Council, Joyce Markham has led the engagement of the West London Alliance and subsequently the West London Partnership in the wider 'SRDF process.' The Harrow Director of Strategic Planning has chaired the Planners Reference Group which has met frequently to discuss the progress of the document and to develop the formal West London Partnership Response to the draft document. Although Harrow Council has been heavily engaged in the wider 'SRDF process,' there are some issues that Harrow Council would like to further stress and other issues pertinent to Harrow. For these reasons Harrow Council has taken advantage of the opportunity offered to also submit a formal Harrow response to the WL SRDF in addition to the sub-regional response.

### **Role of the SRDF** (Introduction para 7)

The primary role, status and content of the SRDF needs to be made absolutely clear in the final document. The West London Partnership response holds the same viewpoint. The SRDF is a non statutory advisory document, as agreed at the London Plan Examination In Public. Whilst in the introduction it states it is seeking to provide 'non-statutory guidance' much of the content is suggesting action on a whole range of 'local' issues. The SRDF should not be construed as assuming a role in the chain of conformity. The GLA is reminded that the LDF and the London Plan together form the development plan for the borough. Development plan documents produced as part of the LDF must be in general conformity with the London Plan.

### **Sub-Regional Boundaries** (foreword and annex 5)

The current West London sub-regional boundary echoing that of the Learning and Skills Council boundary was agreed four years ago, and is now well established. Strategies and plans have been drawn up to cover this same area. Emergency planning and information gathering and sharing could be more easily supported if the police and fire brigade groupings were made co-terminus with the existing West London structure. There are some instances where slightly different boundaries exist for sound operational reasons e.g. the development of a joint Waste Development Plan. Apart from the further realignment suggested at the beginning of this paragraph Harrow Council see no compelling reasons for the current sub-regional boundaries to be changed and many disadvantages in disrupting the well established and credible partnerships in West London.

## **Harrow's Metropolitan Town Centre – focus for development** (section 2A)

Whilst understanding the need to review the town centre hierarchy, as part of the review of the London Plan, the final WL SRDF document needs to provide reassurance for those currently investing in the existing metropolitan centres, to protect their investments and drive renewal and regeneration in the existing metropolitan centres.

Harrow metropolitan town centre is the focus for major development in the borough and the Council has adopted a Town Centre Development Strategy setting out a range of initiatives to maintain and enhance its status and function. The strategy includes, in particular, a far sighted plan to reconfigure and reuse space for a 21<sup>st</sup> century integrated public transport interchange at Harrow on the Hill Station. Radical changes to improve and create a high quality distinctive public realm which can help to attract private investment are also proposed. It is essential that any review of the town centre hierarchy does not prejudice the implementation of these significant initiatives.

A recent survey (July 2005) has shown that 79% of those using the town centre have travelled there using public transport. This demonstrates that Harrow town centre is already developing in accordance with the views set out in the WL SRDF "as a key node on the sub-regional public transport network." This needs to be recognized and further encouragement given to its development using the London Plan review to identify it as a public transport 'Opportunity Hub'.<sup>1</sup>

Harrow Council are keen to ensure that all centres from metropolitan to district are supported so that they are all viable centres providing the surrounding communities with important local services and functions and adding to the vitality of each centre.

## **Housing** (section1A)

Bearing in mind the focus on containing growth in the London Plan it is to be expected that housing has a significant section within the WL SRDF. Harrow is a strong partner in all West London Housing work. However much of Harrow's housing development is small scale, less than 5 units, often conversions. When these are private developments there is no compulsion to deliver affordable housing, this can lead to difficulties in achieving borough wide affordable housing targets. The limited opportunities to increase affordable housing in Harrow should be recognized and the simplistic/misleading Table 1a.4 should not influence the release of land from other sources, especially scarce employment land.

## **Sport, Culture, Tourism and Parks** (sections 1D and 4C)

Harrow Council has gone through a radical restructuring process in the last three years which has given areas such as sport, culture and tourism a much stronger focus.

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<sup>1</sup> This is a new term developed by Harrow officers to denote the increasing focus that town centres can have for development providing they have good public transport links.

A comprehensive audit of sport recreation and open space has identified gaps in current provision. The Council recognise the positive benefits from participating in sport in terms of healthier lifestyles and social cohesion and hope and expect that demand will continue to grow spurred by increases in young people within our projected population increase and by the growing interest leading up to the 2012 London Olympics. Whilst recognising that resources will need to be found locally to help fund this development, it is also hoped that the GLA will support the development of local and community sports facilities, to make better use of local open space. This will be where and how the vast majority of residents take part in sport and enable Harrow residents 'to start, stay and succeed in sport.' Identifying support for flagship projects such as Wembley alone will not enable this to happen. It is to be hoped that this is fully picked up in the London Plan Review (Annex 5 point 11.)

Harrow Council have noted that the area of search for a regional park covers part of NE Harrow. We are unconvinced about the necessity or the benefits of a regional park in this location which lacks access to good quality public transport. A greater emphasis on improving local open spaces would be preferred. Harrow Council would also like to point out that this is a regional issue and would be more appropriately raised in the review of the London Plan.

The SRDF identifies the development of Wembley as a major catalyst for growth by identifying it as an Opportunity Area. However Wembley will be a national attraction and as such Harrow Council is keen to work with our partners in the sub-region and the GLA to make sure that the benefits of this development are spread across the sub-region in terms of tourism and economic activity.

Harrow is changing, 42% of the residents of Harrow are now from an ethnic minority background. Harrow Council recognises the importance of celebrating the different cultural backgrounds of its residents, but sees that this needs to happen locally initially within the borough and the sub-region rather than encouraging its residents to travel to strategic cultural quarters as set out in the London Plan. The existing action (1D.1) undermines the support and encouragement we have given local initiatives in this field.

### **Harrow Suburban Neighbourhoods** (Appendix 5)

The SRDF rightly recognizes that the suburbs provide opportunity for further growth and development. Perhaps now that small neighbourhoods in need can be identified statistically, it is time to trial new ways of tackling 'regeneration/neighbourhood renewal' activity on a smaller scale and move the regeneration agenda into ailing suburban neighbourhoods picking up on many of the suggestions in the Suburban Tool kit.<sup>2</sup>

To many people Harrow is the epitome of suburbia and it would be difficult to make the case for any large part of it to justify being a major new area for regeneration. However

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<sup>2</sup> Developed by URBED for the GLA, it contains ideas to help suburbs become more sustainable

in truth Harrow is a borough of more subtle contrasts, the northern part containing substantial amounts of green belt, whilst much of the southern part of the borough is truly urban, with some pockets showing signs of stress, within which there are district centres struggling to maintain any role. It is here that Harrow would like the opportunity to work on piloting new suburban policies that particularly help district centres reestablish themselves and make them fit for purpose again.

This would also enable us to build on the area working approach that has been pioneered so successfully in Harrow since reorganisation started.

## **Harrow's Position**

### **Transport** (section 2E)

The WLA response sets out concerns at the expected levels of traffic growth over the period. The capacity of the sub-region to accommodate growth, for housing, population and employment will be prejudiced by traffic congestion and its environmental impact will act as disincentives to investment. Harrow is particularly concerned that public transport capacity and policies to manage traffic growth should be priorities, to avoid any decline in the environmental advantages of the borough and the sub-region.

Harrow is on the outer edge of the sub- region and despite improvements to bus priority corridors, the limitations of current public transport mean that travel by car is largely the preferred mode of transport when travelling around the sub-region particularly from Harrow to Heathrow. Whilst radial routes will be improved and strengthened in TfL plans orbital improvements are currently ignored.

Harrow Council is pleased that TfL will be working on a West London strategic transport plan and hopes that this will provide the opportunity to consider the feasibility of extending the Piccadilly line from Uxbridge to Heathrow which would in turn provide Harrow residents with a real alternative to the car when traveling to Heathrow and beyond.

### **Harrow's Location and Employment** (section 2B)

Whilst the level of business and commercial activity is somewhat less than in other boroughs in the sub-region Harrow is keen to at least maintain the same levels of employment activity and vitality, both to support the existing Harrow community and to cater for the expected population increase and the associated employment growth implied. Future needs will be identified in the employment land study about to be commissioned as part of the LDF development process.

Further work on other employment sectoral trends in Outer London (as suggested as a theme in the London Plan review annex 5) needs to result in a better understanding of the issues and a clear evidence base. Harrow would support research into this, and would also be keen to share findings from the employment land study.

This local employment land study will also be used to drive the development of policies pertaining to suburban office space, and to test sub-regional theories. There is concern that over rationalisation of space could lead to a lack of local flexibility, make it more difficult for people to live close to where they work, and run contrary to sustainability principles.

As in many other outer London boroughs the public sector provide the major employment in the borough through the Council itself and the Health sector. House price levels mean that recruiting a wide range of workers from planners to nurses continues to be a problem. Although this problem has received public and press attention in recent years and resulted in various key worker housing initiatives, Harrow Council welcomes the opportunity for this to be more fully looked at in terms of distinct strategic policy requirements, in the London Plan Review point 10.

Harrow Council are already extending procurement initiatives to involve the local business community through a business portal and leading with Hammersmith and Fulham, a bid to the London Centre of Excellence. Harrow Council is keen to share good practice with other London boroughs and also link this to best practice in green and sustainability business practice.

## **Harrow Statistics**

### **Housing** (Annex 4)

The West London Response has already commented that care must be taken to ensure that figures used in the SRDF are not 'enshrined,' but used to denote trends. This is particularly true of the figures used for affordable housing completion. A one year snapshot is meaningless. Officers have evidence to demonstrate that 459 units have been achieved since 2000, which contrasts with the quoted 90 stated in table 1A.4 Affordable Housing completions. The Council would strongly advise that the timeframe for this table is expanded in the final document, and that other more sensitive information sources are used to provide a more complete picture.

### **Childcare** (section 1D)

Harrow officers using 2004 figures state that 28% of children have access to nursery provision rather than the 20% set out in the WL SRDF. Harrow will continue to develop childcare places to meet the demands of the children and families. Harrow Council are actively supporting Harrow Childcare Providers to access the Childcare Affordability programme so childcare becomes more available to families who need it most.

The Harrow Children's Centre Strategy will also look to increase childcare in those parts of Harrow where it is needed most.

## **West London Community Strategy** (annex 5)

Harrow's Community strategy was formally launched last year, this and the forthcoming Local Area Agreements are providing Harrow Strategic Partnership with a full agenda. Whilst conceptually there may be much to be gained in the future in developing a west London Community strategy, there also needs to be an acknowledgement of the considerable joint work going on under the auspices of the WLA e.g. the West London Community Cohesion Partnership in which the LSPs have had a major role in taking forward. Any future work on this agenda needs to be based on a strong evidence base which will need to be resourced.

Harrow will also be making a separate formal response to the alterations proposed to the London Plan for Waste and Housing.

Preview version for PHB  
**Produced - 14.9.2005**

# **DRAFT**

## **Response to the Draft WEST LONDON SUB-REGIONAL DEVELOPMENT FRAMEWORK**

**West London Partnership**

**October 2005**

This document has not yet been agreed to by WLP partners and stakeholders – all comments are proposed and subject to change due to WLA on-going consultation.

**Introductory Pages 1-8 only**





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## **1. Introduction & Overview**

1. West London Partnership (the Partnership) thanks the Greater London Authority for the opportunity to contribute to the development of West London's Sub-Regional Development Framework (SRDF.) The Partnership WLP has been pleased to be part of the development and consultation process and used the opportunity of being part of the development and consultation phase to engage with a wide range of West London stakeholders in identifying the key issues in the early stages of the development process. However as the whole document was not available until July, this is the first opportunity the Partnership have had to comment on many parts of it the document and related actions. The Partnership's consultation process is summarised in Appendix 3.
2. The West London response seeks to ensure that the final SRDF encapsulates West London's priorities and issues and genuinely demonstrates the need for partnership intervention at a sub-regional level. It is important that it is a document that all partners across West London can support.
3. The Partnership's response is a comprehensive one but, at the outset, it is useful to highlight 5 particular issues:
  - a. Accommodating projected growth & ensuring sustainability
  - b. The role & format of the SRDF and Local Development Frameworks.
  - c. London Plan and SRDF principles
  - d. West London's strengths and priorities
  - e. Managing and monitoring release of land.

### **A. Accommodating growth**

4. The Partnership recognises that the most important function for the SRDF is to set out how the projected growth of population and jobs can be accommodated in a sustainable manner within London until 2016. While previous performance suggests that the Partnership can be reasonably confident that the growth targets can be met, - there are still real concerns in the sub-region about how transport, social and community infrastructure will keep pace with population growth. In addition, meeting housing numbers does not necessarily mean meeting housing needs..
5. Our detailed comments are set out later in the document on a topic by topic basis, but it is essential that the SRDF demonstrates a fully integrated and spatial approach to the Sub-Region. The overriding concern is that achieving growth targets without addressing infrastructure requirements and social, economic & environmental considerations in an integrated way will impact adversely on West London's residents, workers & businesses.

### **B. Role & format of the SRDF**

6. Both the SRDF & the LDFs have important complementary roles to play in trying to co-ordinate investment decisions and promote development in a balanced way. But a key concern for the Partnership (and the boroughs) is to make clear the role of the SRDF in tackling these issues (and its relationship to LDFs). This needs to be set out clearly at the start of the document.
7. The Partnership considers that the draft SRDF is not a sufficiently strategic document – the Framework strays too often into areas which should be the province of LDFs, raising local (rather than strategic) issues. As a result, it loses focus. The Partnership would like the SRDF to set out the strategic actions necessary to achieve the objectives, leaving LDFs, within the framework of the London Plan, to address local issues. As a result, the Partnership recommends deleting more than 50% of the actions set out in the draft to enable resources to be focused at the strategic level and to avoid the risk of duplicating actions which are more appropriate in LDFs. By reducing the number of actions overall we would be able to see more clearly the added value that the SRDF brings in supporting sub-regional working.

8. The London Plan Examination in Public agreed that SRDFs should not be part of the statutory planning process and should not introduce new policies. However, there are several examples where this agreement appears not to be followed. For example, in relation to the boundaries of Opportunity Areas and Strategic Employment Locations. Such issues must be agreed at a local level through the development of the LDFs, ensuring that there is local accountability for decisions reached. Other examples are listed in Appendix 1.
9. The draft SRDF spells out neither the timescale for actions nor the resources needed for implementation., Moreover, some of the outcomes expected appear to be aimed at being completed during the SRDF consultation period, eg. clarifying boundaries & posing questions about Town Centres. In essence these actions invite negotiation and agreement before the final SRDF is produced. However, if the consultation response is simply taken by the GLA and decisions made without further reference to the boroughs, this is not acceptable. The next draft of the SRDF should be exposed to further consultation or examination in a neutral forum. The GLA has announced that the final SRDF document will be produced by the year end but this contradicts the undertaking at the GLA scrutiny meeting to consult further with stakeholders if there are substantial revisions to the SRDF. The Partnership was pleased to hear that undertaking.
10. A detailed dialogue is needed between the GLA and stakeholders to agree realistic commitments and the Partnership expects to be part of such a process with the GLA before the final SRDF is published. It is also more appropriate for certain actions to be decided within West London, eg. the distribution of retail growth and open space provision, by boroughs working together (with the GLA) as the local dimension to such decisions is vital. The Partnership has a clear role to play here – the final SRDF, therefore, should not allocate growth targets across boroughs before there has been a more 'bottom-up' involvement of stakeholders.
11. This leads to the other principal concern of the Partnership in relation to the SRDF per se – its statutory basis and relationship with the London Plan and LDFs. The SRDF is informal and non-statutory – its role is important in helping to co-ordinate investment decisions but it should not seek to comment on or question anything in the London Plan. Its role should be to interpret issues of London-wide significance where they have a particular West London dimension to ensure these are taken into account in LDFs. The Partnership sees no need for the SRDF to draw stakeholders' attention to general London-wide issues and tasks set out in the London Plan – stakeholders are addressing these anyway as they are within the London Plan – including many in the SRDF lengthens and complicates the document.
12. The Partnership has several concerns over the format of the draft SRDF. Many issues are inter-related and many are relevant to multiple themes. There is concern that the cross-cutting nature of many of the issues is either not mentioned, or they are only discussed at the end of the document. It is suggested that there is greater reference to the cross-cutting themes earlier in the SRDF.
13. Also, while the SRDF provides a comprehensive overview of West London's spatial issues, these are split between 5 sub-sections (including sustainable growth, spatial allocation, development potential, environmental development and managing development). Separating them in this way, as opposed to grouping them by topic (i.e. housing, waste, transport etc), means readers may miss other relevant parts of each topic if they do not read the entire document. The Partnership feels the document could be more easily understood (particularly by those without a planning background) if it followed the structure in the London Plan or if it was grouped under topic headings (ie waste, housing, town centres, community infrastructure and culture etc.).
14. There is no executive summary or glossary to explain the meaning of technical planning terms, acronyms and collective organisations.

### **C. London Plan and SRDF Principles**

15. The London Plan states that growth, equity and sustainable development are consistent themes throughout all the Mayor's strategies and plans. Whilst growth plays a major role in the SRDF, sustainable development is implicit, rather than overtly stated. The term 'sustainable' is used throughout the SRDF in relation to development, communities and the environment. Bearing in mind the importance attached to the term 'sustainable communities' and sustainable development by central government, it is important for this to be defined and restated as a key principle early in the document. Such terms also need to be clearly defined.
16. Equity gets little mention until later in the document, this should also be set out early in the document linking it to regeneration and renewal, and skills support and how opportunities in West London can be used to address much of the existing social and economic exclusion.
17. If it is agreed that a section is inserted spelling out the principles underlying the SRDF, the Partnership would also like to see that high quality urban design is also made a guiding principle, something that is currently only mentioned in the latter part of the document.
18. The SRDF is a key opportunity to build support and action for this and promote use of the Mayors' SPD on Sustainable Design and Growth, encouraging design champions, etc.

### **D. West London's strengths & priorities**

19. While the SRDF provides a good overview of the main issues facing West London and expected outcomes (particularly accommodating increase population, subsequent jobs and housing), many partners are concerned that the priorities for the West London are not clearly identified in the initial pages of the SRDF. Given that these need to determine where resources are spent / provided, it is important the SRDF states the priorities up front. Therefore, it is recommended that the priorities in the London Plan are reiterated in Part One of the SRDF.
20. West London has two main economic drivers – Park Royal/Wembley and Heathrow. The SRDF does not sufficiently recognise Heathrow and its importance to the West London and London economy. Currently it only provides a description of Heathrow's growth with just one related action in Appendix 5 suggesting it should be a topic for the London Plan review. There needs to be greater recognition of the (positive and negative) effects Heathrow has on the sub-region - and the actions needed to mitigate the negative impacts.
21. Heathrow's expansion is not simply a London issue but also a national one. Whilst West London will undoubtedly benefit from further growth economically, it is West London in particular that will suffer the negative impact of further development in terms of: congestion, noise and poorer air quality. Plans for growth at Heathrow are not just restricted to a new terminal and a possible new runway. The Project for Sustainable Development for Heathrow (PSDH) plans using the existing runways more extensively, which will further impinge on the lives of West London's residents. Officers have argued that decisions on the third runway need to wait until after Terminal 5 is fully operational, and its environmental impact has been reassessed.
22. The GLA recognises that industry is more strongly established in West London than elsewhere and that the demands of growth need to also address existing issues e.g. recruitment and retention in both the private and the public sectors. This is of particular importance to West London. A topic for the London Plan Review should be to develop a broader definition of key worker, and so increase the availability of key worker housing to a broader cross section of employment. Ultimately this will encourage more sustainable local employment levels.
23. The draft SRDF pays inadequate attention to West London's needs for;
  - transport (in particular orbital travel needs and infrastructure upgrades),
  - housing (private and social, particularly in terms of sufficient family housing and addressing existing overcrowding),

- town centre renewal programmes,
- waste and other environmental issues
- community infrastructure, cultural identity.

24. The Partnership is also concerned that data in background studies may have been used too simplistically eg. income and comparison goods in town centre development, without taking into account other related issues, e.g. regeneration of town centres and private market demand. Figures used also lack clear commentary, and there are also occasions where snapshot data has become 'enshrined' rather than used to demonstrate trends

### **E. Monitoring the release of land**

25. Managing and monitoring the implementation of actions in the London Plan and SRDF is of course vital. The Partnership is keen to work with the GLA to develop the ideas (some of the which are included in Appendix 1 - CHECK) of how to make better use of existing monitoring systems. For example, any release of commercial and industrial land needs to be carefully managed, to ensure that there is sufficient provision for future use. This is particularly true in West London where there is little chance of recapturing land lost to housing.

### **Reviewing the SRDF**

26. The Partnership would appreciate clarification on the GLA's view on :.

- a definition of who a is 'partner' and 'stakeholder'
- when the SRDF will be reviewed (ie every 2 years) and the process
- the priority of actions (it would be useful if they related back to the national and sub-regional priorities)
- a proposed timeline to achieve the actions
- state result of non-compliance
- developing a action monitoring plan and identify how this will be managed (is it possible to co-ordinate this with the West London Economic Development Implementation Plan monitoring).

### **Sub-regional boundaries**

27. The Foreword to the SRDF questions the alignment of the sub-regional boundaries and their ability to support effective joint working between boroughs and other agencies. It states that the boundaries will be reviewed. The Partnership is not aware of any evidence that the current boundaries are not effective, efficient and appropriate. However, it is noted that West London has multiple sub-regional documents (including the West London Economic Development Strategy and implementation plan, air quality plan, transport plan, tourism strategy and action plan, and a draft waste strategy which are aligned to the current sub-regional boundary. Existing partnership arrangements between many stakeholders reflect the current boundary. Any proposal for changing the boundary of the SRDF sub-regions needs to take account of existing strategies and partnership arrangements and be subject to full consultation with partners. It is by no means certain the existing partnerships would be willing to reconfigure their boundaries to meet new SRDF sub-region and therefore and if this were the case it would impact adversely on the partnership arrangements necessary to deliver the SRDF implementation plan.

28. If a review of the boundaries is carried out then the opportunity should be seized to consider the relationship of other organisations sub-regional boundaries to the sub-regions including those of health (already subject to a separate review) and police sectors.

### **London Plan Review**

29. Views have been requested on issues to be considered in the forthcoming London Plan Review. The draft SRDF lists 29 areas where there could be implications for West London. The Partnership considers the following areas to be especially important areas for review:

- the results of the Housing Capacity Study and housing development targets;
- jobs growth targets throughout West London but especially in the Opportunity Areas;

- provision of sites for warehousing;
- implications of the Olympics;
- it would be useful to use the Review to provide an opportunity to benchmark London's performance against European competitors;
- runway capacity;
- waste planning;
- town centre network;
- public transport improvements, especially the need for improved orbital routes;
- changes to reflect the content of Economic Develpt. Implementation Plan, including strengthening measures to promote appropriate mix of employment;
- review of Opportunity Areas, including potential new ones;
- potential to strengthen policies to promote improved air quality;
- others?? .....
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(Note: Potential areas for review listed in the draft SRDF on which views are requested:

- Housing capacity study
- Waste planning
- Runway capacity in the SE
- Sustainable town centre network
- Climate change
- Strategic flood risk assessment
- Prioritising public transport improvements
- Draft SEERA Spatial Strategy – assessing the implications
- Identifying potential growth sectors
- The public sector as employer and implications for local labour markets, sills, land requirements, disposal strategies
- Implications of Olympics for transport, tourism, sports development and the economy
- Co-ordinating public service planning and opportunities for collaborative action
- Monitoring systems and sharing information
- Additional Opportunity Areas and Areas for Intensification
- Possible need to review boundary of West London
- Changes to the town centre network
- Possible changes to extent of Opp. Areas and their relationship to their hinterlands
- Review of Heathrow South Opp. Area
- Possible further intensification of develpt. and altering phasing and other actions in Opp. Areas
- Possible new Opp. Area, eg the Golden Mile Brentford
- Location and indicative boundaries of Locally Significant Industrial Sites
- Changes to reflect content of integrated sub-regional transport network plan
- Changes to reflect content of Econ. Develpt. Implementation Plan
- Possible additional Areas for Regeneration
- Poss. strengthening of policies to deliver gtr. env. sustainability. esp. better air quality
- Additional policies for the suburbs and gtr. attention to neighbourhoods
- Assessments to protect and enhance street market provision in light of forthcoming Mayor's Food Strategy
- Potential consolidation of London's wholesale market functions at three locations across London
- Possible locations for tall buildings)

## 2. Specific Issues

### Part One

#### The Direction for West London

The draft SRDF currently provides a very limited description of West London. Whilst it is necessary to demonstrate how West London fits into the London wide picture, starting the section in this way does not give a clear concise picture of West London. An alternative description of West London is identified in the West London Economic Development Strategy and states:

“With a population of almost 1.5 million West London has a large and diverse economy which contributes £27 billion to the UK economy and employs almost 750,000. One of West London’s key strengths is that it has a diverse, energetic and dynamic population, with some 35% of residents from black and minority ethnic communities. This rich, multicultural and international base provides strong links to international communities and markets. Whilst an overview of West London reveals a relatively prosperous area the reality for some is very different: significant pockets of deprivation exist within the sub-region.”

The benefit of using this description is that West London stakeholders have already been consulted on it.

The WL SRDF description also fails to note that the innermost parts of the sub-region are much more intensely developed with limited land for further use, but very good access to public transport, and view themselves as urban. This contrasts with parts of outer West London where larger sites are available but which are distinctly suburban with poor access to public transport. Road congestion is common across most of West London.

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