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**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, skills, 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.