

Appendix 2

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 21st 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'.¹

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.

¹ 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.

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.

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.²

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 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

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

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.