

DRAFT FINAL

**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.

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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 has been pleased to be part of the development and consultation process and used the opportunity 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 has had to comment on many parts of the document and related actions. The Partnership's consultation process is summarised in Appendix 3.
2. This 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 the SRDF 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 in relation to 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 balanced and sustainable manner within London until 2016. The key challenge is to ensure that growth is balanced, but there are 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. The housing growth targets, and the consequent need to increase residential densities, not only put an increasing strain on supporting infrastructure, but it is becoming increasingly clear that we are not developing enough family housing, especially in the affordable sector, to keep pace with housing needs. This is a major issue and one needing to be addressed at the London-wide, sub-regional and local level.
5. Our detailed comments are set out later in the document on a topic by topic basis rather than the existing SRDF headings (similar to the London Plan format), but the SRDF must demonstrate 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 & environment.

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 with a sub-regional focus – the Framework strays too often into areas which should be the province of LDFs, raising local (rather than sub-regional) issues. As a result, it loses focus. The Partnership would like the SRDF to set out the sub-regional 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 sub-regional 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. In recommending this reduction, the Partnership is not disagreeing with the need for most, if not all, of them – it is simply a question of ensuring that the actions neither duplicate work already underway or planned nor dilute the proper focus on sub-regional issues.

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. The Partnership strongly supports this view. 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.
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. 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 part of the LDF preparation process 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 - there needs to be 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 – it is not going through any of the formal stages which both the London Plan and LDFs have gone and will go through. It is not subject to examination in a neutral forum and is not subject to a full sustainability appraisal. 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 nor seek to constrain decisions which need to be taken (and consulted on) in the context of LDFs. The SRDF's 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. It also needs to be made clear in the document that the SRDF should not be a material consideration in determining planning applications. This is important as otherwise it risks cutting across the statutory requirement on boroughs to assess and consult on options as part of their LDF preparation.
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 (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 terms 'sustainable communities' and 'sustainable development' by central government, it is important for these terms to be defined and re-stated as a key principle early in the document.
16. 'Equity' gets little mention until later in the document - it should be set out early on linking it to regeneration and renewal, 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' SPG 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 increased population & subsequent jobs and housing growth), many partners are concerned that the priorities for West London are not clearly identified in the initial pages of the SRDF. Given that these need to determine where resources are committed, 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. 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,
 - improved air quality;
 - waste and other environmental issues
 - community infrastructure, cultural identity.
21. West London has two main economic drivers – Park Royal/Wembley and Heathrow. A major omission in the SRDF is that it does not sufficiently recognise Heathrow, its importance to the West London and London economy and its impacts. 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.

22. Heathrow's expansion is not simply a London issue but also a national one and West London will undoubtedly benefit from further growth economically. However, 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. Decisions on the third runway need to wait until after Terminal 5 is fully operational and T5's environmental impact has been reassessed.
23. The SRDF should also flag up the importance of taking full advantage locally of the benefits of Heathrow's growth, especially in terms of skills training for local people to increase the proportion of local employment. But this also needs to be complemented by improved (and affordable) public transport accessibility especially from the surrounding areas of deprivation. As an investment co-ordinating document, the SRDF has to recognise more the need for greater investment in infrastructure in relation to the impacts of Heathrow's expansion.
24. The GLA recognises that industry is more strongly established in West London than elsewhere and that the demands of growth need also to 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 workers, 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.
25. 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 using data to demonstrate trends

E. Monitoring the release of land

26. 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 which are included in Appendix 2) 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 the jobs needed to sustain the population growth. Market demand in West London is usually for any land released to be developed for housing but, as the SRDF points out, employment land is also a potential location for waste facilities and, given the comments in the response about the importance of matching social infrastructure to population growth, employment land will also have a role in that provision too. The importance of effective, reliable and up-to-date monitoring information is highlighted by this employment land issue – the potential release of 40 hectares of industrial land relates to the period from 2001 but we know that significant areas of industrial land have already been developed for housing and other uses since then. It is vital to assess exactly how much has been developed across the sub-region and the GLA is requested to resource the work needed to determine the up-to-date position.

Reviewing the SRDF

27. The Partnership wants to be part of a continuing dialogue with the GLA on the next draft of the SRDF. When finally approved as an informal, non-statutory document, there should only be a need to review it following approval to a revised London Plan. However, there should be regular monitoring reports to update information and to track key investment decisions especially on the infrastructure improvements needed to support growth. The GLA is

requested to commit the resources necessary to co-ordinate this, working in conjunction with the Partnership.

28. In producing the next draft of the SRDF, it is suggested that the document :
- defines who is a 'partner' and 'stakeholder'
 - establishes the priority of actions (related back to national and sub-regional priorities)
 - proposes a timeline to achieve the actions
 - includes an action monitoring plan and proposes how it will be managed ensuring full engagement of all partners and stakeholders (and linked with the monitoring of other sub-regional strategies, including the West London Economic Development Strategy Implementation Plan).

Sub-regional boundaries

29. 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, housing strategy, 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 a 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. Boundaries do not need to be a barrier when a common agenda is emerging, eg. West London Partnership's work with Thames Valley Partnership on skills and growth sectors.
30. 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-region including those of the health sector (already subject to a separate review) and police clusters to improve emergency planning and information sharing.

London Plan Review

31. 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 implications of the Housing Capacity Study and housing development targets;
 - jobs growth targets throughout West London but especially in the Opportunity Areas;
 - updated analysis of economic growth sectors to understand better any land requirement implications;
 - provision of sites for industry and warehousing, including logistics;
 - reviewing the concept of Strategic Employment Locations and, if appropriate, considering whether Heathrow itself should be so designated;
 - changes to reflect the content of the Economic Development Strategy Implementation Plan, including strengthening measures to promote an appropriate mix of employment;
 - the impacts of Heathrow, including health impacts;
 - airport runway capacity;
 - potential to strengthen policies to promote improved air quality;
 - implications of the Olympics;
 - waste planning;
 - town centre network;

- public transport improvements, especially the need for improved orbital routes and the content of the sub-regional transport network plan;
- additional policies for the suburbs with a greater emphasis on neighbourhoods, particularly as it is expected that much growth will take place in the suburbs;
- review of Opportunity Areas and Areas for Regeneration, including potential new ones;
- reviewing the relationship with, and implications of, SEEDA and EEDA strategies;
- review cultural and leisure services locations, including the cultural quarters proposed by the Mayor;
- reviewing the implications of climate change;
- monitoring systems and information sharing, particularly at a sub-regional level;
- reviewing the economic contribution which the public sector as employers can make in addressing social and economic issues in West London;
- it would be useful to use the Review to provide an opportunity to benchmark London's performance against European competitors (including sub-regional information too).

2. Specific Issues

Part One

The Direction for West London

32. 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.
33. The SRDF description also fails to note that the inner 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
34. Partners are pleased to see that sustainable development is within Part 1 and as part of the Mayor’s foreword. However, for paragraph 16 to have the significance it needs, it should be placed right at the beginning of the document::
- “our real challenge is how we manage growth so that it enhances rather diminishes West London’s existing, generally high quality of environment so that it goes into the places and takes the forms that will revitalise areas of deprivation and poor environment.”
35. Diagram 2 – This could be viewed as just too schematic - if the names of the abutting sub-regions were added it would be easier to understand.
36. Paragraph 18 is the first mention of people/communities, yet if this framework is all about building sustainable communities which in turn help to build a ‘sustainable world city’ the mention of communities needs to be more than merely stating that there are strongly defined communities.
37. The line on communities needs to be strengthened, taken out and added into the West London description in paragraphs 13 & 14.

Response to Action Points

Part One: Core Actions		
Point 1	Action	Boroughs, West London Partnership and Business and other stakeholders are asked to use the consultation process on this draft SRDF to agree the above direction for West London and to commit to aligning their own plans to that direction.
	Discussion	It is not possible to directly align all existing plans, which will have been previously agreed with a wide range of different local partners over several years.
	Response	Support action Amend to recognise the need for <u>future</u> plans to be aligned
Point 2	Action	Boroughs, LDA, and TfL should produce, at the earliest opportunity, planning frameworks for key development areas to develop the agreed direction, to maximise the use of improvements in public transport capacity, and provide the framework for sophisticated management of change.
	Discussion	The timing for developing planning frameworks will need to be negotiated with individual boroughs and will be dependent on timings set out in each LDF and borough resources.
	Response	Support action Amend wording to state “ <i>Boroughs, LDA and TfL are encouraged to produce, in line with LDF development, planning frameworks for key development areas...</i> ”
Point 3	Action	Stakeholders are invited to re-affirm their willingness to act in partnership to deliver the targets and commitments in this SRDF and agree timescales for implementation. Partners are invited at this stage to comment on what has worked well so far and on those areas where specific improvements are needed with a view to resolving them in the final document.
	Discussion	In providing a strong and detailed response from across the West London Partnership, partners have affirmed their willingness to commit to the SRDF, any exceptions to this have been spelt out in the individual responses submitted.
	Response	Support action Amend – first sentence to read “stakeholders are encouraged to continue to act in partnership...” Delete second sentence of action
Point 4	Action	Stakeholders are asked to use the consultation processes on all the SRDFs and the Regional Spatial Strategies to improve co-ordination of cross-boundary issues.
	Discussion	This is a key activity and West London is a good example of sub-regional co-operation and joint working
	Response	Support action
Point 5	Action	Stakeholders are invited to identify sub-regionally distinct indicators to refine and target the existing London Plan based monitoring process.
	Discussion	Monitoring the impact of the SRDF and the progress of the SRDF actions is addressed elsewhere in this response. It is important to make better use of existing monitoring systems e.g. LDD and aligning LDS annual monitoring reports to provide this information on an annual basis (see appendix 2)
	Response	Support action Encourage the Greater London Authority to work with West London Partnership, boroughs and stakeholders to help refine monitoring indicators, support the collection of relevant data and to adequately resource the maintenance of those systems.

Point 6	Action	Stakeholders are asked to re-examine cross border economic flows and identify locations where growth can be accommodated in the most sustainable way.
	Discussion	The Partnership notes that is an area of work where resources are hard to find. The Boroughs have identified that they would welcome further research to more clearly identify flows in and out of the sub-region and support to develop joint plans to make the best use of this information
	Response	Support action which should be led by the GLA group working closely with the Partnership.

Parts Two, Three & Four

Introduction

38. The Partnership's comments on Parts 2, 3 & 4 are structured on a topic basis to enable all the actions relating to each topic to be considered in one place. These comments therefore follow more the structure of the London Plan than the draft SRDF. However, the response to each Action Point is clear.
39. The broad introduction for Part Two is a useful overview of the purpose of the SRDF. The need for further clarification of growth requirements is noted in the introductory paragraphs and this is highlighted by elements of Table 2.1 lacking absolute numbers.
40. Paragraph 32: This caveat needs more prominence, perhaps it would best fit as part of the 'principles' statement mentioned earlier.
41. The principle that growth should be accommodated in areas with access to good public transport, particularly the town centres, opportunity areas, suburbs and SELS, has been adopted by all UDPs finalised since the London Plan was published. Visible signs that this principle has been adopted are evident in most of the sub-region's town centres. Whilst it does no harm to reinforce the message that growth needs to be allocated "to optimise the relationship between the intensity of development and the existing and potential capacity of the public transport system," this becomes a problem when public transport is already almost operating at full capacity and any major transport improvements will only be in the long term. The point will be made in more detail later on, but a key failing of the SRDF is that it does not review the currently planned public transport improvements and identify gaps in that investment - the Partnership considers strongly that there needs to be much greater investment in orbital public transport routes as one of the pre-conditions for accommodating growth in a sustainable way.
42. Most growth is seen as being accommodated in the Opportunity Areas, Intensification Areas and town centres. Existing land use policies are already encouraging this to happen and this will be restated in the new LDFs. However it will remain increasingly important to monitor if the perceived job growth takes place, where (and in what sectors) it is based across the sub-region and to monitor job losses too. Whilst it is expected that the major developments in the area will also trigger the major employment increases, e.g. Terminal 5 and Wembley, this may be counteracted to some extent by job losses. West London still provides a London base for many global companies whose decisions to move out of an area often have nothing to do with the local environment. While overall numbers are important, it is also vital to understand trends in the type/sector of employment and then to assess to what extent it is realistic to influence those trends by appropriate interventions. A proactive approach to economic development is vital and the draft SRDF should highlight this to a greater extent.
43. The Partnership is also concerned that proposed development in the pipeline may not materialise. West London Business' recent trend data has demonstrated that there is far less speculative office building. Thus it will become increasingly important for reality checks to be made on pipeline developments to encourage sufficient employment space to be built. Monitoring the impact of smaller developments on job growth is more problematic, and will probably only take place when new employment studies are carried out, unless this information is required as part of the LDS annual monitoring reports. As with all other mention of monitoring throughout the document, this will have resource requirements which the GLA should identify.
44. It is agreed that there will need to be "sensitive programming of development in town centres and OAs to avoid oversupply developing, maximising the use of those locations that are most

accessible etc.” At the same time it remains important that all the required supporting infrastructure, not just public transport, is factored into development plans.

45. Paras. 105/106: Boroughs are looking at the capacity of Opportunity Areas and reviewing the initial figures set out in the London Plan. However, much more detailed work is needed to judge whether these targets can be achieved – this work will be concluded as part of each borough’s work on their LDF (with boroughs collaborating as necessary).

Response to Action Points

Part two, section 2.1: Allocating growth spatially across West London		
Point 1	Action	The Mayor proposes to develop more detailed phasing plans in conjunction with the LDA, TfL, the boroughs and other stakeholders
	Discussion	It will require careful monitoring and co-ordination at both a sub-regional and a local level to enable any phasing plans to be successful. This is aspirational and the Partnership is uncertain how this will be achieved in relation to the private sector. In theory, it should be easier to prepare phasing plans for the necessary public sector investment to support (and stimulate) development by the private sector but they will need to be regularly updated and implications of any changes re-assessed to ensure growth takes place in a balanced and sustainable way
	Response	Delete action – but the Partnership welcomes an opportunity to discuss with the GLA and other partners how this can be achieved in a meaningful way.

Part two, section 2.2: Allocating growth spatially across West London		
Point 1	Action	The Mayor will convene annual sub-regional monitoring meetings for all partners to assess progress, to discuss future plans and to agree further actions as necessary
	Discussion	Extend existing monitoring systems to collect information on actual job growth, job growth location and job losses. Please note resource implications for developing standardised collection system
	Response	Support action

Point 2	Action	In preparing their LDFs and in considering planning applications, boroughs should fully reflect the need for increased densities and seek to encourage them wherever appropriate
	Discussion	This is already happening – it is also important to judge the need for higher densities against the impact on the character of existing areas and the need, as recognised in the London Plan, to ensure sustainable residential quality.
	Response	Delete - this is a requirement of the London Plan and is being addressed locally in LDF preparation.- there is no need for the SRDF to re-state the action.

Housing

46. The Partnership is pleased that the issues it raised during the development of the SRDF have been included. However, further comments are necessary. There is general concern about how to effectively monitor boroughs' performance against the affordable housing target of 50%. Affordable housing completions as noted in Table 1A.4 show a range of 14-70% across the sub-region. However, this data only refers to 2003/4. It represents a snapshot in time, as opposed to actual housing trends – this limited information should not be used as the basis for commenting on each borough's performance. It is important to analyse the reasons for achieving less than the 50% affordable homes target – these can be many and varied. For example, despite intense housing needs a lower proportion may have been agreed on financial grounds because the developer has been required to fund other important social infrastructure needed to support the new and existing residents. Moreover, the issue of funding the construction of affordable units is crucial – achieving 50% (or close to it) is nearly always dependent on securing grant funding. If grant aid is not available at a particular time, it can be very difficult to get developers to agree to delay the construction of those units until grant funding is available as it can have knock-on delays for the construction of the whole scheme. Another reason can be that, with higher residential densities, the number of smaller units proposed by developers increases but the prime need for affordable rented units is for larger family accommodation. This means it can be difficult to achieve the desired size and tenure mix to meet housing needs with increased densities.
47. The Partnership would like the SRDF to acknowledge specifically the successful cross-borough work which has been done within West London over the past few years on housing issues led by the West London Housing Directors. By recognising this work it will then also be clear that many of the proposed actions are not relevant within the SRDF as they are already being done (dedicated staffing, the revised West London Housing strategy, sub-regional choice-based lettings scheme, affordable housing bids to the Housing Corporation etc.)
48. Some boroughs have greater scope than others to accommodate more housing – for example, on larger development sites it can be easier to achieve a higher level of affordable housing with the desired balance between social rented and intermediate units. There is an argument for saying that the achievement of the affordable homes percentage should be assessed on a sub-regional basis so that boroughs unable to meet their targets (for legitimate reasons) can have their deficits made good in other parts of the sub-region. This argument perhaps applies even more now that there is a choice-based lettings system operating across the sub-region.
49. House prices are also obviously a major issue within West London and the difficulties this creates for many essential workers. The definition of key worker needs to be expanded recognising the needs of both public and private sector employers – the resolution of this issue is obviously beyond the remit of the SRDF but it could be useful to flag it as a key issue in creating a sustainable future for West London.
50. Specific concern has also been raised that higher quality urban environments need to be promoted. The Partnership is concerned that higher density housing developments can lack quality design and are not always seen as appealing places to live. Higher density developments must be of a quality that people want to live there. The GLA should be promoting stronger guidance on how to achieve better quality urban environments.
51. The SRDF needs to recognise the housing needs of different sectors of the population. The Partnership is concerned that age profiles and life expectancy rates will have a dramatic effect on the type and style of accommodation (ie. accessibility) needed in the future.
52. Part 2, section 5 of the SRDF is a key section – it should be moved to be earlier in the document - as it focuses on how increased development needs will be practically delivered.

The most obvious ways will be through greater housing/development density and greater mixed use activity – but, as stated above (para. 48), this can make it much more difficult to secure needed larger family accommodation in the social rented sector.

53. The release of documents by the GLA needs to be better co-ordinated as the SRDF was published just before the results of the Housing Capacity Study. That Study potentially alters the housing targets to be achieved.

Response to Action Points

Part two, section 1: Proposed actions 1A – Housing		
Point 1	Action	In light of the GLA Housing Capacity Study, boroughs are asked to programme the release of identified capacity at borough level. They should check in particular against actions below for the release of industrial land, priorities for the intensification of Town Centres and the phasing of public transport developments and improvements (see also Sections 1G and 2).
	Discussion	<p>Programming the release of land is not possible, for the following reasons;</p> <ul style="list-style-type: none"> • boroughs are not in control of land release – they can grant planning permissions but whether those consents are implemented depends on a wide range of factors outside the control of local planning authorities; • some boroughs are able to accommodate greater housing development than others, as they have large-scale development sites, opportunity areas and intensification areas; • some boroughs have few substantial sites for housing and are more reliant on infill development and windfall sites which, by their nature, are more difficult to identify; • large-scale developments often take a long time to gain planning approval and have to overcome many constraints, eg. the provision of the necessary utility services, before development can start. It is difficult for local authorities to programme this effectively; • construction starts are also linked with financial or market constraints on the developer totally outside the control of the local authority; <p>The need to monitor development capacity and activity is agreed but it is too simplistic to call on boroughs to programme the release of that capacity. However much they might like to be able to do this, they are not in a position to do it in a meaningful way. To programme when developments can occur, based on an arbitrary rationale of how many developments should be occurring at any one time, would be difficult as the boroughs have no control over private developers. The action is not considered to be achievable and, as such, should be deleted.</p>
	Response	<p>Delete action as not practical to implement at a local borough or sub-regional level. However, a stronger co-ordinated approach to monitoring planning consents and construction starts and completions would be welcomed making best use of existing HCP research and LDD information to draw a schedule of development to maintain a sub-regional overview of progress.</p>

Point 2	Action	Partners should bring forward development frameworks on key sites where the transport infrastructure can cope, building in the need for social and other infrastructure, setting minimum standards for higher densities and specifying appropriate housing size mix and mixed use priorities. (See also Sections 1E, 1F and 5).
	Discussion	<p>There is general concern with this action as it suggests that the GLA is directing the planning areas the Boroughs should be focussing on.</p> <p>The Partnership notes that boroughs are working hard to produce all necessary planning documents as quickly as possible. This action does not provide any practical additional guidance to boroughs on how to prioritise plan development</p>

		<p>or how specifically development frameworks could be produced for specific areas</p> <p>The boroughs note that current resources are stretched as they undertake the development of their LDF's and associated planning documents in accordance with their LDS's (approved by GOL).</p> <p>Boroughs are aware of the need to accommodate an increasing population, greater jobs and homes within West London. There is a delicate balancing act required to ensure that future housing development does not encroach on land for jobs and to encourage greater housing density in appropriate locations.</p> <p>The boroughs note that the London Plan emphasises this point and are addressing these issues through their LDFs. There is little added value in including this action within the SRDF.</p>
	Response	Delete action as it is already being addressed at the borough level through LDFs.

Point 3	Action	Boroughs should consider the involvement of the public sector, including other partners, in site assembly and other interventions.
	Discussion	<p>There is a high level of joint working between, the boroughs, public and private sector housing and developers. Such working has been encouraged within West London for a long period and a revised West London Housing Strategy has recently been prepared.</p> <p>Within West London partners are consistently working together and this action does not pay credit where it is due.</p>
	Response	Delete action as does not add value to existing West London processes.

Point 4	Action	Boroughs should identify and programme necessary site preparation.
	Discussion	Same as for point 1 above.
	Response	Delete action

Point 5	Action	Boroughs and other stakeholders including the GLA group are invited to establish a co-ordinated system to monitor and manage the issues outlined above across the sub-region.
	Discussion	<p>Within the Partnership it is recognised that there is a need to monitor the sub-regional output level of housing (all tenures) to determine how the sub-region is tracking against the Mayor's targets. It is noted that such monitoring was carried out by the Housing Capacity Study. However, there is concern that the information may not always be current and that the Housing Capacity Study only monitors developments above 5 units. Boroughs with few large sites rely on infill housing and such development is usually less than the housing capacity study threshold. Therefore, the data will not be presenting a complete picture of housing development activity in West London.</p> <p>The Partnership supports this action. It is noted that during initial discussion with partners in West London, any data needs to be captured within existing borough monitoring practices. The sub-region is still identifying what needs to be monitored and how this data can be obtained efficiently, where it will be stored, how it will be accessed, who will analyse it, how it will be distributed and how monitoring will be resourced.</p> <p>The Partnership is not in a position to provide guidance to the GLA at this stage, but would welcome its support.</p>
	Response	Support action Reword the action to recognise that such a monitoring system is necessary and the GLA will support the West London Partnership in identifying how such a system could be monitored and managed.

Question 1A		
Point 1	Action	Is stronger guidance needed for the provision of more affordable housing in the areas that are under-performing and /or the development of a West London consortium approach to the provision of affordable housing?
	Discussion	<p>There already is a high-level of joint working within West London and with neighbouring sub-regions (including Kensington & Chelsea). This includes the operation of a sub-regional choice-based lettings system. The SRDF should acknowledge West London's successes. West London was the first sub-region to produce a joint housing strategy (and is now updating and revising it). This should be used as an example of best practice.</p> <p>The sub-region does not believe stronger guidance is necessary. The points made in point 1 above are also relevant here about performance in achieving the affordable housing target.</p>

Part two, section 5: Proposed actions 5A – Densities		
Point 1	Action	Boroughs should include detailed proposals for higher densities in their LDFs, in accordance with London Plan policies (including master plans for larger sites), and introduce a policy to refuse developments that represent an under-use of land (see also Action 2.2).
	Discussion	Similar to previous discussion, boroughs are aware of the need to provide for areas of higher density development, particularly in areas close to town centres, opportunity and intensification areas and with good public transport accessibility. This is being taken into account in preparing LDFs and master plans are prepared for larger sites. This action does not provide any additional guidance over what is already in the London Plan - reiterating actions in the London Plan is not considered necessary.
	Response	Delete action as it does not offer any further guidance on how to accommodate increased housing/development density within boroughs. However, boroughs are considering this action as a matter of course within their LDFs because of the London Plan policies.

Part two, section 5: Proposed action 5B – Housing mix		
Point 1	Action	The views of boroughs and other partners are invited at this stage as to what actions will best lead to the provision of the larger units that are needed in the sub-region.
	Discussion	There is a particular shortage of family accommodation coming through in the affordable housing sector. It is important to identify how to secure larger family accommodation within the sub-region. This needs primarily to be done at the local level in LDFs but it is important also that strategic policies and targets recognise this major issue. Despite the need for greater family housing, borough controls alone are not sufficient to change private developer mindsets. Private developers will normally try to optimise their profits by building the minimum size of affordable housing accommodation. It is noted that there is considerable support to lobby for Government housing targets to be amended from pure dwelling numbers to include also habitable rooms per unit – and that principle should be reflected in London-wide targets too (although it must be recognised that establishing detailed targets can only be done at the local level because local housing needs can vary). This should give boroughs a stronger influence over dwelling size mix. The implications of this approach for residential density standards must also be recognised – with priority given to achieving the needed size mix for the affordable homes.
	Response	Support sub-regional and regional lobbying for affordable housing and funds to support more family housing.

Part two, section 5: Proposed actions 5C – Mixed use and changes of use		
Point 1	Action	When assessing larger developments, boroughs should consider whether the introduction of a wider range of uses could increase the sustainability of the development and/or the centre.
	Discussion	<p>Boroughs often seek a mix of uses in appropriate locations but the crucial determinant of whether that is taken up is the perception of market demand by the developer (where they relate to 'marketable' uses) or to the ability to subsidise from the development 'non-commercial' uses. The requirement to provide 'non-commercial' uses (ie. those that do not generate a significant land value) can then impinge on the ability to provide other elements of the scheme – most notably, the percentage of affordable homes – if the whole development is to remain financially viable.</p> <p>Existing major and metropolitan centres are increasingly under pressure to provide greater mixed use activities (ie retail, commercial and housing) but there is often more potential in those centres. It can be more difficult to encourage a mix of uses within district and local centres. All the boroughs consider it important to increase the viability of district and local centres but all boroughs find it difficult to promote mixed use development there (other than just residential).</p>
	Response	Delete action as it is an existing borough activity.

Point 2	Action	Boroughs and developers are asked to take account of guidance given in Section 1 on retention and change of uses from offices to other uses and seek to manage the consolidation of the outer West London suburban office market through the regeneration of existing premises and to meet the long and medium term office requirements.
	Discussion	<p>The issue of managing the land used for offices is a key concern within the sub-region, specifically as land that is currently under utilised is likely to come under increasing pressure to be used for housing. The Partnership supports this initiative to encourage the boroughs to actively manage the available office land to support the long-term viability of the sector.</p> <p>However, the Partnership notes that office land also needs to be managed at a sub-regional level, as any significant decreases in office land could have a significant impact on land within West London. Therefore, it is essential that Boroughs monitor and manage the amount of land changing uses to prevent over-supply in the short term.</p> <p>The action identified in the SRDF reads more as a recommendation than as an action to be carried out. Also there is concern that it does not recognise the need to manage the West London office market as one entity. There is a danger that without an overview of what is happening across the office market, significant changes could go unnoticed.</p> <p>Therefore the Partnership supports the GLA monitoring the amount and availability of office land in the London Development Database and encourages any amendments to the database to ensure such monitoring can be done.</p>
	Response	Support the intent of the existing action.

Point 3	Action	Boroughs and developers are asked to take account of the strategic principles guiding retention and change of use from industry to other uses, given in Section 1.
	Discussion	As previously noted in this submission, the West London strategic principles are not clearly identified in Section 1 of the SRDF. These principles need to be

		<p>more clearly identified, as they are the basis for the SRDF. The Partnership notes that these principles were not easily identified by any of the stakeholders and partners consulted. Therefore they need to be more explicitly and clearly stated.</p> <p>Additionally the Partnership notes that this action does not add anything further to the actions previously identified in the SRDF.</p>
	Response	Delete action as reiterates requirements in actions throughout the SRDF.

Part two, section 5: Proposed action 5D – Tall Buildings

Point 1	Action	Stakeholders are asked to comment on areas in the sub-region that are in principle suitable for the location of tall buildings.
	Response	The potential for tall buildings on development sites needs detailed local consideration – the action should be deleted as it is a local issue for determination via LDFs..

Employment and offices

54. The draft SRDF does not fully reflect the importance of this issue. It focuses on the area of land used and does not acknowledge sufficiently the need to take a broader economic development perspective – as reflected in the West London Economic Development Strategy. It needs to recognise the importance of actions to promote higher levels of local employment – not least because of the sustainability perspective. Also, it does not take proper account of the development of broadband communications and changes in working practices which have led to more effective use of office space with particular growth in ‘touchdown’ and home working. Little attention is paid to any changes that might impact on employment in the sub-region in terms of sectors and changing skills needs.
55. Paragraph 41: use of statistics, needs careful reading so that the statistics make sense.
56. Paragraphs 42 – 44: while accepting that the increases in predicted jobs may be less than expected, the revised projection of nearly 25 % less seems to need further explanation. There needs to be some commentary alongside the table in the related Annex with regard to losses from each sector within the document.
57. The SRDF seems to contain contradictory views of the office market. On the one hand, it states that 70% of jobs growth is predicted as being in the office sector. Yet, later in the document, it states that, for most of outer West London, the office market is stagnating and there will be limited future office development. This could be interpreted as meaning that outer West London will see a far smaller increase in jobs, if the recommended policies are applied (Annex 4, 2A.1). The market for larger office floorspace has been experiencing a relative slump for some time now. Despite this, there is still a need (and demand) for smaller office space especially to support start-up businesses and SMEs. It is important not to view ‘offices’ as one whole sector with a consequent policy response seeking to discourage further development without recognising the different sectors of the ‘office market’.
58. While there is surplus office stock in several parts of outer West London, care needs to be taken to avoid over-simplification by only equating the number of jobs with the amount of land needed to sustain them.

Response to Action Points

Part two, section 1: Proposed actions 1B - Employment and Offices		
Point 1	Action	The Mayor will work with LDA, boroughs and other stakeholders to protect and enhance viable, affordable provision for SMEs in appropriate locations, and, through the Sub-Regional Economic Development Strategy and Implementation Plan¹, to meet their specific needs for business support and training (see also Section 3).
	Discussion	The Partnership is pleased to see that the Mayor recognises that sufficient affordable space for SMEs needs to be secured. It is likely that s106 agreements will be needed to support such provision and the SRDF should encourage and promote the use of agreements in this way.
	Response	Support action
Point 2	Action	In light of the national requirement to justify retention of commercial and industrial capacity and the need to accommodate new sustainable communities, the sub-regional market analysis must continue to be tested rigorously through strategic and local monitoring, carried out by the Mayor and partners, with a view to managing the existing stock more efficiently to meet identified commercial and industrial needs and to release surplus capacity for housing and other priority uses.

	Discussion	Recognise that this needs to happen but that appropriate additional resources need to be found to carry out effective monitoring making better use of existing systems as suggested in Appendix 2
	Response	Support action Amend 'partners' to 'boroughs'

Point 3	Action	Boroughs and other partners should promote the consolidation and re-positioning of the sub-regional office market in appropriate, viable locations and achieve wider planning objectives including town centre renewal and increased housing provision (see also Section 5).
	Discussion	Rather than simply consolidate or reposition, more proactive actions are needed to deal with the existing stagnant office stock that is threatening efforts to increase the vitality and liveability of some town and district centres. It is also vital that the office sector is not seen as one entity – as is recognised in Point 2 above, there is a need to promote smaller office accommodation for SME's so the call to 'consolidate and re-position' the office market needs to be more appropriately phrased to recognise the different sectors of the market. Moreover, if 70% of jobs growth is expected in the office sector, the justification for seeking just to consolidate the office market seems rather weak – using that argument it needs to be expanded. The SRDF needs to contain a more clear and refined analysis of West London office employment and growth prospects. The Partnership is happy to contribute to a clearer analysis using its local knowledge.
	Response	Support action but amend to: 'Boroughs and other partners should promote office development in appropriate locations accessible by public transport recognising the need for a range of office sizes and taking special account of the needs of SMEs many of which are in growth sectors.'

Point 4	Action	In partnership with the LDA, boroughs are asked to facilitate the implementation of the Mayor's EDS through the coordination of Sub-regional Economic Development Implementation Plans.
	Discussion	The Partnership, with LDA support, has already prepared a West London Economic Development Strategy and draft Implementation Plan
	Response	Support action

Industry and warehousing

59. Industry and warehousing is an important part of West London's economy and West London is an important part of London's industrial and warehousing sector. Heathrow is the main driver of demand for industrial and warehousing land, particularly in the south of the sub-region, but the important role played by the industrial and warehousing stock in Park Royal needs also to be recognised. But significant areas of industrial and warehousing land are under considerable pressure from competing, higher value land uses, particularly housing. The critical issue for West London is how to manage the demand for industrial and warehousing land in the face of this competition and the need to ensure balanced growth. The projection is that 40 hectares of industrial land could be 'lost' across the sub-region from 2001-2016. The pressure has been such that much of this 40 hectares might already have been 'lost' which is why it is essential to ensure effective sub-regional monitoring. The SRDF also flags the need for more waste management sites in West London – indeed, estimates suggest this might require over 40 hectares in the period to 2020. However, the industrial land under greatest pressure from housing tends to be those sites closest to existing residential areas which might not be acceptable locations for new waste sites. Boroughs will be paying particular attention to this whole issue in their LDFs - and it is an issue on which there needs to be sub-regional collaboration to ensure a co-ordinated approach within West London in promoting a balanced economy.
60. The SRDF could suggest that boroughs consider the potential of encouraging medium density mixed use zones, particularly at the interface between existing industrial land and residential housing.
61. Paragraph 98 of the SRDF encourages stakeholders to use the SRDF process to identify Locally Significant Industrial Sites to inform the review of the London Plan. By their nature, locally significant industrial sites can be small and there are a large number of them. Boroughs are concerned that, as these sites are relevant at the local level, it is not appropriate for them to be included in detail in the review of the London Plan. Defining Locally Significant Industrial Sites within the London Plan will also reduce the flexibility for the boroughs to amend sites or redefine them and so reduce local control. Although the London Plan should support the principle of designating Locally Significant Industrial Sites, the boundaries of those sites should be defined through each borough's LDF process, also taking into account the issues in para. 60..

Response to Action Points

Part two, section 1: Proposed actions 1G – Industry and warehousing		
Point 1	Action	Stakeholders' views are sought on the broad analysis of prospects for the West London 'industrial' sectors set out above and whether any further evidence is to be taken into account in developing the sub-regional approach.
	Discussion	Boroughs have already allowed some loss of industrial land to other uses and development pressure remains intense in some areas. Indeed, a large part of the 40 has. identified as potentially being allowed to be developed for other uses will already have been developed (or have planning permission). More detailed discussion is needed on this very important issue between all stakeholders.
	Response	Delete action as it is a question.

Point 2	Action	Boroughs are invited to test the monitoring benchmark proposed for the sub-region for inclusion in LDFs in light of the need to ensure that adequate land exists to maintain the long term viability of the economy.
	Discussion	For the reasons explained above, the figure of 40has. should not be included as a firm figure in the SRDF until there has been more detailed analysis of the land already 'lost' since 2001 (which could be substantial). The GLA is asked to resource this exercise as a pilot within London as well as support the introduction of an improved sub-regional monitoring system to enable more effective and up-to-date tracking of land use changes (both commitments and completions).
	Response	Delete action but commit the GLA, in conjunction with the Partnership and the boroughs, to undertake a more detailed review in time for the issue to be re-visited as part of the London Plan Review (see also Point 9 below)

Point 3	Action	Boroughs are asked to programme the release of identified land using the principles above for inclusion in LDFs and development frameworks.
	Discussion	<p>The response to Point 2 above is also relevant here. The Boroughs and the Partnership are concerned about the ability to actively programme the release of industrial and warehousing land within the sub-region. The Boroughs do not consider they are able to prevent land from being released ahead of another site purely on the basis of an arbitrary ranking system.</p> <p>To prevent development occurring all at the same time (i.e. when the market is high), it would be useful for the boroughs to attempt to ensure there is some land in reserve for future development. However, given that the land is usually privately owned, boroughs do not see how they can control the market.</p> <p>Boroughs note that greater provision of mixed use activities on industrial and warehousing sites could be one way of providing greater housing development while still maintaining a reasonable level of light industrial activity or even incubator sites. They are addressing such issues in their LDFs.</p> <p>However, the Boroughs do not consider that the programming of industrial land release in their LDFs is feasible.</p>
	Response	Delete action

Point 4	Action	Boroughs and other partners are asked to draw up proposals for relocation as appropriate in association with the LDA.
	Discussion	The Partnership notes that Boroughs need to first identify areas of industrial land that may be suitable for other uses (after having been assessed for waste facility needs). Obviously, this will only be a preliminary desk-top exercise as property owners may not wish to change the use on their land, or a site previously not considered may come forward. Therefore, it is not possible to predict exactly what will need to be relocated – that can only be done at a local level.
	Response	Delete action as this is most effectively done at the local level as and when the need arises.
Point 5	Action	Boroughs and stakeholders are asked to demonstrate how it is intended to take a more positive and proactive approach to accommodating warehouse provision in appropriate locations, including identifying those which are particularly suitable.
	Discussion	<p>Again this action is phrased more as a question.</p> <p>Within West London the industrial and warehousing market is strong as many importers and exporters like to be located close to Heathrow. Land in and around Heathrow is the most expensive industrial land in the country. Boroughs do not have the power to intervene positively in the warehousing market to protect land for that use as opposed to, for example, an industrial use. However, it is noted that there is a need to protect the existing industrial</p>

		land to ensure that the economic viability of West London is not jeopardised by the release of land suitable for both industry and warehousing.
	Response	Delete action as it is a question Replace with wording in the text of the SRDF (not as an SRDF action) suggesting boroughs review all industrial sites, prioritising those most suitable to protect against inappropriate development proposals.

Point 6	Action	Stakeholders are asked for their views on the proposal that, in the medium to long term, London's wholesale market functions could be consolidated on multi-purpose markets located at New Spitalfields, New Covent Garden and Western International. This may require maintenance or extension of existing market capacity at Western International, subject to testing through the SRDF process and strategic as well as local assessments.
	Discussion	Again this action is actually phrased as a question. Planning permission has provisionally been granted (subject to no objections from GOL /ODPM) for a redeveloped and consolidated Western International Market next to its current site. This will provide modern space for the more efficient functioning of this important wholesale market serving west and central London.
	Response	Delete action as it is a question – although the Partnership supports the improvements planned at Western International Market.

Point 7	Action	2D Boroughs and other relevant stakeholders are asked to comment on the location and indicative boundaries of SELs (Annex 2) and are encouraged to identify Locally Significant Industrial Sites in light of local and strategic industrial demand assessments.
	Discussion	See Point 1 under Strategic Employment Locations.overleaf.

Point 8	Action	Pending Alterations to the London Plan boroughs should not release significant industrial sites (generally over 0.5 ha) until these are tested against strategic and local needs and policies for waste management facilities.
	Discussion	The Partnership supports this action, as it recognises the need to ensure any industrial land be considered for its suitability for use as a waste site – particularly, as previously stated, a significant (but, as yet, unquantified) amount of industrial land has already been released for other development since 2001. The Partnership and boroughs are particularly concerned to secure enough sites suitable for waste facilities within the sub-region.
	Response	Support action – indeed, given the importance of the waste issue, there is a case for saying that no industrial land should be released for other development until it has been tested against strategic and local waste needs (see also the section on infrastructure services).
Point 9	Action	Boroughs and other stakeholders including the GLA group are invited to establish a co-ordinated system to monitor and manage the release of industrial land within the sub-region.
	Discussion	The SRDF identifies that 40 hectares of industrial land could be released across West London for other uses, notably housing, from 2001-2016. Boroughs are experiencing substantial pressure from the development industry to allow the conversion of more than this figure – indeed, some of this land will already have been released. The Partnership notes that West London is concerned that the SRDF does not clearly identify how the actions are going to be monitored, and that the London Development Database may not capture all lower level information to enable boroughs to monitor land use and availability comprehensively. The Partnership is already considering monitoring needs and is keen to see

		better use being made of existing monitoring systems to avoid duplication of resources. However there are resource implications for any increased monitoring which need to be noted (see appendix 2 for more details)
	Response	Support action but recognising the need first to review the amount of industrial land which has already been 'lost' since 2001 before considering the potential to release more. See also the response to Point 2 above.

Strategic Employment Locations

62. The SRDF recognises the need to protect employment and industrial land to maintain the viability of the sub-regional economy. Strategic Employment Locations (SELs) for each borough are identified in Annex 2 of the SRDF. It is noted that this is the first time these areas have been mapped and indicative boundaries drawn. The London Plan (Annex 2) identifies that SELs should be identified in Unitary Development Plans. It also states that draft supplementary planning guidance has been prepared, identifying criteria to help the boroughs manage, protect and enhance the designated SEL areas. The London Plan goes on to list preferred SELs (including industrial locations and business parks). The London Plan does not identify indicative SEL boundaries.
63. Given that the London Plan identifies that SELs should be clarified through the local planning process, the Partnership is concerned that the SRDF seeks to define the indicative West London SEL boundaries (Annex 2). This cuts across action which the boroughs are already taking to define these boundaries as part of preparing their LDFs, eg. Hounslow is currently consulting the public on the location of the SELs in their borough. Thought also needs to be given to whether Heathrow Airport itself should be part of a Strategic Employment Location given its huge economic importance – this could be an issue for the London Plan Review
64. The Partnership recognises the Mayor would like to see the SEL boundaries defined and greater protection given at the local level for employment land. However, the Partnership and boroughs do not believe that the SRDF should be attempting to guide outcomes that have yet to be publicly tested. The Boroughs are concerned that the SRDF indicative boundaries may imply to the general public that the areas are already finalised, before wider consultation has been completed.

Response to Action Points

Part two, section 2: Proposed action 2D – Strategic employment locations		
Point 1	Action	Boroughs and other relevant stakeholders are asked to comment on the location and indicative boundaries of SELs (Annex 2) and are encouraged to identify Locally Significant Industrial Sites in light of local and strategic industrial demand assessments.
	Discussion	This action is phrased as a question. For the reasons outlined in paras. 63-66, the boundaries of both SELs and Locally Significant Industrial Sites should be defined through LDFs
	Response	Delete action Replace with: 'Boroughs are encouraged to identify, refine and implement the boundaries of the SELs in West London as soon as practicable in accordance with the supplementary planning guidance and the issues identified in the SRDF within each LDF.'

Annex 2: Strategic Employment Locations – draft indicative boundaries		
Maps 1, 2, 3	Discussion	For the same reasons as above, these maps should be taken out of the SRDF although broad locations reflecting the London Plan list (Annex 2) could be included.
	Response	Delete maps

Retail & Town Centres

65. The Partnership agrees that the ability of West London's town centres to improve their image and attractiveness is key to accommodating sustainable growth. Much of their vitality will be driven by a suitable retail offer and, where appropriate, improved office accommodation. Making this happen through a co-ordinated strategic town centre network will be extremely difficult - however this is a challenge that the sub-region is keen to take on. Rather than growth being encompassed in just the larger established centres, there also needs to be flexibility to promote development to support regeneration. Hayes Town Centre is one example of this.
66. Most of the Metropolitan and Major centres already have growth and renewal plans to retain and attract further footfall to their area.
67. Having a town centre that is fit for the 21st century is something that preoccupies a great deal of local time and effort. While acknowledging the principle of the need to view development across the sub-region there is also a need to maintain the viability of all centres. Although the greatest demand (and often the greatest potential) for growth is likely to be in the larger centres, the expansion of some centres can have a negative effect on the viability of others. It is vital, therefore, that boroughs and their town centre partners – for commercial, sustainability and regeneration reasons – have the flexibility to encourage appropriate change and growth in all centres. Reliance on modelling to restrict growth proposals in some centres is not supported albeit, clearly, there is a limit to growth and there has to be collaboration between West London boroughs on their respective proposals. The Partnership intends to facilitate this collaboration.
68. Sub-regional town centre development will need to provide benefits for each partner involved, and may need to start, not with a discussion on which centres might merit becoming a metropolitan centre but instead focus on the distinctive offer each centre is aiming to provide. It is important to seek a complementary long-term development approach and also learn from other city regions where polycentric centre development is even further advanced.
69. Prospective retail developers make a comprehensive assessment of possible sites before making contact with boroughs. It is unlikely that they will have any local allegiance and, if asked to consider alternative sites in the sub-region, may look even further afield, and possibly outside London.
70. At the other end of the scale many district and local centres are struggling to remain viable, and retain existing multiples. A small number have a 'niche' market but it is unlikely that the remainder will be in a position to do anything proactively to enable their survival. Making use of the 'Tomorrows Suburbs' toolkit may help to encourage boroughs to review their holistic support to these centres (see also the later section on Suburbs). There is still demand for out-of-centre development – and, indeed, different views within the public and private sectors of the Partnership about its future potential. The position of the London Plan in resisting such development, however, is acknowledged and will be taken forward in LDFs.
71. Paragraphs 112 – 113: Office development has been given consideration separately with the review of employment land needs. There is general acceptance of the distinct sub-regional approach to managing office provision albeit, as previously stated, the office sector should not be viewed as one composite sector – the needs of SMEs need particular consideration.
72. Paragraph 114 Night time economy – Best practice guidelines on the managing the night time economy will be welcomed.

Response to Action Points

Part two, section 2: Proposed actions 2A – West London Town Centre Network		
Point 1	Action	When making provision for anticipated retail demand in LDFs, boroughs should take into account the borough level expression of comparison and convenience goods floorspace requirements to 2016 and the indicative level of comparison floorspace need for Metropolitan and Major Town Centres set out above and for District centres and ‘residual’ requirements provided in Annex 1.
	Discussion	This is a local matter and the trend data needs to be balanced against the actual outcomes/data. The predictions of floorspace take no account of various important factors including the need for area regeneration. The basis of the predictive modelling is also not clear.
	Response	Delete action as it repeats Action Part 2 section 1, action 1c (see overleaf)
Point 2	Action	Working with strategic partners and neighbours, boroughs should identify capacity and make provision for ‘residual’ growth in town centres where it can best enhance consumer choice, enhance existing vitality and viability and is most accessible by public transport. In general this is likely to be mostly in Major and Metropolitan centres.
	Discussion	The basis of the predictive floorspace modelling is not clear and the use of such modelling is not supported as a basis for distributing retail growth. A wide range of factors must be considered in promoting such growth and, while most growth is likely to take place in the larger centres, it is important also to take account of the need for smaller centres to grow as a key part of developing sustainable communities. Boroughs will be making these judgements as part of the LDF process
	Response	Delete action as this is a local issue which boroughs will be undertaking, in collaboration as necessary, in preparing their LDFs.
Point 3	Action	Boroughs and other stakeholders should co-ordinate large scale leisure, retail and related developments to avoid compromising strategic objectives for the town centre network as a whole, including sustainable access to goods and services for residents, workers and visitors.
	Discussion	Boroughs and other stakeholders do share information on large scale town centre developments to encourage a distinctive and sustainable town centre network to develop
	Response	Support action - boroughs do work together as necessary, on major development proposals and the Partnership will facilitate this continuing collaboration.
Point 4	Local	The town centre network as set out in Annex 1 will be reviewed in light of strategic assessments of need and capacity, town centre health checks, strategic and local objectives.
	Discussion	Boroughs do collaborate on their town centre plans but it is vital that growth forecasts fully reflect local and strategic issues. It is not appropriate for the SRDF to list modelled predictions of floorspace need – not least because the basis of these predictions is not set out and it ignores the importance of local issues. The draft SRDF also questions the role of some existing town centres and this is not appropriate – the town centre network in the London Plan should be recognised and the important role acknowledged of boroughs working individually and together to plan for town centre growth.
	Response	Delete action

Point 5	Action	In light of local circumstances boroughs are asked to test and refine the broad office action and locational typology summarised above and detailed in Annex 4, Table 2A.1 to inform the review of the London Plan and the preparation of LDFs.
	Discussion	The intended aims of the locational typology are understood but the Partnership considers that it focuses too heavily on town centres and locations for larger offices. As previously stated in this Response, the need for smaller offices for SME's (many of which are in growth sectors), must be recognised and development encouraged in suitable locations - which can be many and varied. Such development can also help boost the regeneration of particular areas.
	Response	Support the action of testing the typology but also want to see that typology amended – some significant office areas are omitted, eg. the 'Golden Mile' in Brentford, and it must be recognised as well that the development of offices outside locations in that list can be acceptable, particularly where they are geared to the needs of smaller businesses. The classification of some centres in the typology is questioned – Willesden is suggested as 'no purpose in promoting offices' – but, subject to the resolution of many issues, land around Willesden Junction Station could have the potential for greater commercial development (and is designated in the London Plan as an Intensification Area) – but see later comments in this Response about this area too). Other locations close to stations could also be appropriate for office development, eg. the Greenford Green area in Ealing.
Point 6	Action	In responding to this consultation boroughs and other stakeholders are asked to indicate how they propose to develop the cultural and leisure roles of the town centre network in accordance with Mayoral and sub-regional strategies.
	Response	Delete as this is already covered in each borough's cultural and tourism strategies – duplication

Point 7	Action	More specifically, boroughs are asked to work with strategic and local partners to explore how future growth in the night-time economy might be accommodated in appropriate centres supported by co-ordinated and sensitive management practices.
	Discussion Would the boroughs accept this?	This could be interpreted as meaning that the sub-region needs to develop a plan which details which centres might expand their night-time activity and where it will be resisted. The potential for expansion of the night-time economy is an issue which needs to be determined within each centre and is not, in general, a sub-regional issue. Boroughs already work with town centre partners, including community safety partnerships, to address this issue which is especially at the forefront of work now with the licensing regime changes There is no added value in including this action in the SRDF.
	Response	Delete action

Point 8	Action	Boroughs and other stakeholders are asked to have regard to the West London Tourism Strategy and Action Plan, and indicate in LDFs where they hope to bring forward hotel development capacity to support strategic hotel dispersal policy.
	Response	Delete action - boroughs are already signed up to the West London Tourism Strategy

Part two, section 1: Proposed actions 1C – Retail		
Point 1	Action	When making provision for anticipated retail demand in LDFs, boroughs should take into account the sub-regional and borough need for new comparison retail floor space to 2016 indicated in Table 1C.1, the indicative baseline need for new convenience floor space to 2016 in Table 1C.2 and the town centre expressions of need identified in Section 2 and Annex 1.
	Discussion	<p>It could also be argued that the continued rise of internet shopping will result in an increased need for distribution centres rather than further shops.</p> <p>The Partnership notes that Experian data was used to estimate the potential future need for comparison goods. The Partnership acknowledges the work involved in producing a study of this type and recognises that it is a useful predictive tool. However, as with any study, significant assumptions are made as to the need and demand of certain sectors of the economy.</p> <p>Therefore, the Partnership notes that the projected growth in Table 1C.1 of 119,000 to 185,000 square metres is very much an indicative figure. As per previous comments, the way in which these figures are conveyed in the SRDF as absolutes is a concern to all West London partners and stakeholders.</p> <p>To put the comparison goods figures in context, they provide, at the low end, another Harrow town centre and, at the high end, nearly two Harrow town centres, across the sub-region until 2016. In view of the fact that each of the boroughs is already planning expansion within their metropolitan or major centres, the comparison goods expansion envisaged seems limited. Expected comparison goods development within the sub-region is likely to far exceed the projections in the SRDF.</p> <p>Boroughs are aware of the need to provide controls in their LDFs in the face of the need to increase comparison goods floorspace and the potential for this to be developed in opportunity, intensification areas and in town centres. The Partnership does not consider this action is stating an outcome and does not add any further guidance to the boroughs on how to manage conflicting land use needs. However, the boroughs, under the Partnership's umbrella, do aim to collaborate on retail expansion proposals and it is felt that agreeing provision for growth between partners at the local level is the most appropriate way to proceed rather than having targets set from above which can overlook the importance of local factors.</p>
	Response	Delete action
Point 2	Action	Boroughs are asked to undertake detailed assessments of need for new retail space and especially for convenience goods. In addition to quantitative needs, these assessments should take into account qualitative need including the complexion of the existing retail offer, under/over-trading and accessibility.
	Discussion	<p>The Boroughs have advised the Partnership that within the new Local Development Framework planning system, such assessments are required. The Boroughs note that retail developments require input from specialist sectors (ie transport, utility providers etc.) to ensure the impacts of such centres are comprehensively considered.</p> <p>The Partnership suggests that the assessments identified in this action would be better noted in the main text of the section (paragraph 54).</p>
	Response	Delete action as boroughs are already required to undertake such reviews for new development.

Point 3	Action	Boroughs are asked to verify the pipeline of convenience goods floorspace, including the strategically significant proposals in Table 1C.3 and consider these in light of local assessments of need and the sequential test.
	Discussion	<p>There are concerns with the pipeline development identified in the SRDF. Specifically, the Partnership and boroughs note that not all pipeline developments come to fruition.</p> <p>Similarly, other developments are often proposed that have not previously been identified as in the 'pipeline'. Having an effective monitoring system is very important at both the local and the sub-regional level.</p> <p>It is noted that there is no reporting procedure for the review of the pipeline information identified. It would be useful to include reference of who the information is for in the action.</p> <p>Therefore the Partnership supports the action. See Appendix 2 for additional comments on monitoring.</p>
	Response	Support action

Point 4	Action	Boroughs and other stakeholders are invited to join with the Mayor in identifying areas where reconciliation of retail need and capacity requires co-ordination both within the sub-region and between West London and its neighbours including those beyond the London boundary.
	Discussion	<p>The Partnership recognises that a sub-regional overview and the relationship of West London with other sub-regions and London itself are important. Developments outside West London can have a significant impact on the viability of centres within West London. However it is noted that it is unlikely that Boroughs will turn down the offer of any new retail development, in the current competitive town centre network.</p> <p>Therefore, the Partnership supports greater co-ordinated working between boroughs and sub-regions. The Partnership notes that this is the type of communication and joined up working it is trying to foster and achieve, as it is likely that any infrastructure upgrades, etc. that result from new retail development will benefit not only the immediate area, but hopefully West London as a whole.</p>
	Response	Support action.

Suburbs

73. We are pleased to see that this section has been expanded following comment to the GLA on early drafts. Suburbs cover around two-thirds of London, existing plans and policies need to be adapted to make sure that they have a suburban dimension that is appropriate to a variety of areas, and make the most of suburban opportunities. As the description states, West London's suburbs have, in general, proved very adaptable and their popularity endures. This does not mean that all are able to meet the increasing demands of the 21st century, as the SRDF states (para. 102) some suburbs are 'entering a period in which renewal of their fabric will be needed.'
74. Boroughs are limited in the resources they can allocate to supporting and improving the suburbs. Improvements to street lighting, traffic management measures and improved street cleaning are the main areas for environmental action, together with investment in schools and social infrastructure. Other parts of each borough though may have more intense problems and deprivation, meaning suburban issues have to take a lower priority. However central government's focus on neighbourhoods and community engagement is encouraging a similar approach to the SRDF, albeit not from an accommodating growth perspective, but improving the liveability of smaller areas. This approach combined with the SRDF drawing attention to the fact that suburbs can in effect be 'areas of opportunity' where future growth can be accommodated, could be the means to encourage boroughs to draw up holistic plans for suburban areas facing decline.
75. The Partnership is pleased that the SRDF does not just see the suburbs as dormitories but recognises that the suburbs also provide employment albeit often in the service sector.
76. Changes in shopping habits and working practices have meant that there has been a general decline in the use made of local suburban centres. The SRDF rightly realises that local suburban centres are the keystone of each suburban area and stresses the importance of paying attention to the 'clean and green agenda.' However, it can be that suburban centres miss out as resources are focused on larger centres, or more deprived areas in receipt of external funding streams. This can leave some suburban centres at the start of a downward spiral, exacerbated by a poor retail mix and increasing community safety concerns. Neither do they often have access to community development programmes to aid possible social exclusion issues, build community engagement and community pride in their area. There are so many suburban centres, not all of them can become a 'specialist' centre. It will remain important that each area provides good quality services and addresses community safety fears.
77. Currently there is a great deal of emphasis on changing behaviour, encouraging greener travel and more use of public transport. This campaign needs to be extended to encourage residents to walk to and use their local centres and neighbourhoods and access public transport.
78. Encouragement to use the tool kit 'Tomorrow's Suburbs' is welcomed in general and it is hoped that its use will go beyond the pilots in Greenford and Hayes. The SRDF text could usefully highlight more fully the suburban character of much of West London, listing the historic typology of different suburbs, the environment and the dominance of family housing.

Response to Action Points

Part two, section 2: Proposed actions 2C – The suburbs		
Point 1	Action	Boroughs are asked to take forward the proposals in the Tomorrows Suburbs toolkit in order to assess and encourage activities that sustain economic and community vitality.
	Response	Support action but amend its wording to include reference to encouraging community engagement at a neighbourhood level so that suburban centres are helped to develop their roles to become sustainable and fit for the 21 st century.
Point 2	Action	Boroughs and developers are asked to take into account the analysis of the suburbs above when preparing LDFs and drawing up applications, and link with proposals in the forthcoming SREDIP (see Action 3B).
	Discussion	This is a sensible link but boroughs need to have the capacity to work at neighbourhood level
	Response	Support action

Culture, Leisure and Tourism

79. The draft SRDF was published before the Olympic decision was made. Although the Olympics will have most impact on the regeneration of East London, they also need to have a positive impact across the whole of London and inspire and drive a wide range of improvements to existing sports facilities for all ages as well as the linked areas of culture, leisure and tourism. Hopefully it will also mean that there are increased opportunities for sports activities as a leisure pursuit also encouraging healthier lifestyles. This section should include a major reference to sport and its importance in promoting sustainable communities and healthier lifestyles.
80. Paragraph 55: culture, leisure and tourism are not only providers of services but also employ substantial numbers across West London. With the development of Wembley in particular and building up to the Olympics in general there should be many more opportunities for employment. It will be important to work with the sector board and make sure that lessons are learned from earlier initiatives, eg. the training initiative for the 'Dome' particularly to ensure that West London residents have the chance to benefit economically from training programmes and have the opportunity to train and gain entry into higher level jobs within this sector.
81. Paragraph 57: while there are several 'strategic' clusters of night time economy, there are also many local clusters which boroughs are considering in the emerging borough strategies and which will help to strengthen the sub-region's tourist and cultural activities. These are being considered in the context of any environmental constraints imposed by surrounding uses. The related action needs to encompass far more than only encouraging growth around Wembley's strategic cultural quarter (very important though that is as a sports and tourism venue).
82. The London Plan refers to SRDFs considering possible locations for strategically important 'percent for art' schemes – the SRDF should encourage stakeholders to propose suitable schemes (recognising that decisions on those schemes should be taken locally).
83. The importance of parks in leisure and cultural life is not recognised in the SRDF – and with increasing densities, quality public open space – both large and small - becomes even more important (see also comments under the 'Environment' section of this response). Open spaces beyond West London's boundaries should be taken into account too and the Maps (4D.1 & 2) do not fully reflect available open space.

Response to Action Points

Part two, section 1: Proposed actions 1D.1 – Culture, Leisure and Tourism		
Point 1	Action	
		Boroughs are asked to consider the need to accommodate future growth in cultural and leisure services (including strategic provision where appropriate) which meets the needs of all groups in the community and encourages community cohesion, including creative industries. Growth should be accommodated in line with the Mayor's Culture Strategy and the locations identified in Section 2. The unique offer of the Strategic Cultural Area at Wembley should be sustained and enhanced.
	Discussion	Boroughs support the idea of using the future growth in cultural and leisure activities to meet the needs of all groups and support community cohesion subject to addressing satisfactorily any environmental constraints imposed by specific locations. However, there is concern that limiting growth solely to the strategic areas set out in the Mayor's Culture Strategy might undermine local cultural development which the boroughs and communities have invested in heavily.

		<p>Local and strategic cultural action does not need to be mutually exclusive.</p> <p>West London is an important location for creative industries and Partnership members are pursuing strategies to expand this sector further, especially at White City, Park Royal, central Ealing and Southall, linking also with the tertiary education sector.</p> <p>There is a demand for more workspace for creative activities – performance space, offices, rehearsal & exhibition space – but such uses can often struggle to afford market rents. The SRDF could highlight the need to consider providing for this type of space in mixed use development schemes – perhaps on a joint use basis to enable a degree of cross-subsidy in s106 agreements.</p>
	Response	<p>Support action Amend by taking out ‘in line with locations set out in Mayor’s cultural strategy and the locations identified in Section 2’ – although the Partnership wants to make clear it supports that strategy but it is important to have the flexibility of allowing appropriate growth in other locations too. The Partnership also strongly supports the concept of Wembley as a Strategic Cultural Area.</p>
Point 2	Action	<p>In exploring the spatial implications and potential for increasing provision of visitor-related facilities in the sub-region and tourist-related clusters, boroughs are asked to have regard to the West London Tourism Strategy and Action Plan. This will include capitalising on proximity to facilities outside the sub-region, and building on West London’s strengths in creative industries and specialist retail.</p>
	Discussion	<p>This is supported – the successful Olympics bid will need to prompt a review of visitor accommodation capacity across London and the estimate of an extra 5,200 rooms to 2016 may need to be revised.</p>
	Response	<p>Support action</p>

People, Communities and Social Infrastructure

84. It is unfortunate that the community element is spread across the document: Section 1 includes a brief description of West London's communities, followed in Part 2 section 2 by two sections on social and community infrastructure, including education and health, and in Part 2 section 3, a section on ensuring development brings benefits to communities. It is argued that the current format of the SRDF reduces the focus on people and communities which is at odds with one of the overarching concepts of the London Plan (and SRDF) to develop a city which can accommodate population growth. This point was made forcibly by one of the LSPs.
85. However, it is not only about how to accommodate growth but how to use the opportunities presented to build a London that will:
- a) help to address the inequalities felt by some communities; and
 - b) build on London's diversity and promote community cohesion to improve the quality of life for all Londoners.
- This means that plans for improving healthcare, addressing education needs and providing sufficient community infrastructure for all age groups need to be factored in at the beginning of all planning activity. This does not come through clearly or strongly enough in the draft SRDF.
86. The Partnership is concerned that the SRDF does not adequately identify the need to provide for public safety, particularly through environmental and urban design. Given the recent London bombings, public safety is even more important. It has been suggested that community safety, and addressing the fear of crime, should be part of the document.
87. In the draft SRDF, the text for health and education appears in social infrastructure but the actions are in section 3 (ensuring development brings benefits to communities). By bringing these sections together it becomes more coherent and logical to understand the context of the actions.
88. There should be reference to the introduction of Local Area Agreements, recognising the impact these will have on delivering essential services including health.
89. Para. 72 : delete the reference to 'Harefields' as a science park as it has not been developed.
90. Paragraph 159: replace term 'trans-people' with 'trans-gender'.

Social Infrastructure

91. Assessing the social infrastructure impact of new development and of accommodating the projected growth is a vital concern to existing residents. There is widespread concern among residents in many parts of West London that population growth will not be matched by supporting community infrastructure – schools and health facilities in particular. Resources in some areas of West London are already very stretched, eg. GP premises in Southall and, in some areas, there is little scope to increase the number of school places without major new investment. S106 agreements must provide some of the required funding but only rarely will these be able to provide all the resources necessary. There needs to be a discussion with central government and the Mayor about how additional resources can be made available to provide the facilities needed to address existing shortages as well as accommodating new growth. The aim of creating sustainable communities will be very difficult to achieve in some areas without adequate publicly-funded resources for this supporting infrastructure.
92. Para. 70: with regard to higher education, it is appropriate to mention graduates' key role as new entrepreneurs, and putting in place support to help this happen. Westminster University has a large campus in West London on the Brent/ Harrow border, which obviously needs to be included as part of West London's HE provision as well as the important roles played by

Brunel and Thames Valley Universities. Westminster University has 5,500 students on site and a master plan which has the capacity to increase numbers by an extra 5,000 in the next ten years. In addition, Imperial's School of Medicine is based in Hammersmith & Fulham.

93. Para. 71: the Partnership suggests the list of agencies involved in training and skills provision also needs to include Job Centre Plus. Dedicated training packages are often limited to areas of high unemployment, which exclude the smaller numbers outside the area who are equally excluded. This means that residents in some parts of outer London find it more difficult to access additional support to address the barriers to employment which they face. Sufficient and appropriate ESOL provision is a key issue in a sub-region with a high proportion of residents for whom English is a second language. Mention of this should also be made in the list of support needed. Much of the projected jobs growth is seen as being in 'higher level' skill jobs. The need to increase the skills of local people to match better these jobs is vital – as is the need to recognise that employment is needed requiring a range of skill levels if the proportion of local people in local jobs is to be maximised.
94. It is agreed that improved urban design, quality housing, access to green spaces, etc. all have a role to play in health improvement. Creating the HUDU unit, and as part of its role encouraging appropriate health professionals to have a clear plan of how to best use limited resources to improve health provision, is a positive move.
95. Paras. 60-65: health planning already increasingly takes into account new and developing communities' health over the last five to ten years, but this work depends on the timely supply of accurate demographic information. Health partners have advised that the consultation timescale for the SRDF and the development of the sub-regional health strategy do not coincide. It is hoped that there will be the opportunity for information from the new health strategy to be fed into the final version of the SRDF. The table in annex 4 1E.1 needs updating following recent decisions on hospital rebuilding.

Ensuring development brings benefit to communities (part 2, section 3)

96. Paragraph 159: the title for this section is misleading - the detailed text does not refer to all communities but to communities who have previously experienced barriers to opportunities. The proposed action does little to provide any extra support to the particular groups listed, as it is just linked into area policies, but some of those excluded live outside the strategic areas for regeneration. It is important to refer to the work of the Learning and Skills Council and education and training providers in helping people overcome barriers to employment.
97. The opportunity to list for consideration new smaller areas for regeneration is welcomed. However no additional indicators have been suggested to help identify smaller areas.
98. The Partnership supports paragraph 161, sustainable local economies, and recognises the need to promote better orbital public transport links across the sub-region, to help local people work locally to avoid longer and more costly travel.
99. Paragraph 162: securing economic and social inclusion and improving health, does not mention the refugee population. Additional support is usually vital to help refugees become established, integrate into the community and gain employment.
100. The Partnership notes that community strategies are relevant to a specific local context and usually cover one borough. There is concern that a West London wide community strategy would not identify specific communities and lead to an homogenised approach to community planning. There is also concern within West London that a sub-regional community strategy could undermine local decision making, as boroughs already have their own community strategy and have identified and defined relevant local priorities with key partners.

101. There may be a need to develop a simple overarching strategy which brings together existing sub-regional documentation. This, as with any other sub-regional planning strategy, will need additional resources to develop and implement. Calling this a community strategy will lead to confusion with existing borough community strategies and perhaps conflict with LSP plans. It should also be noted that the work of LSPs is currently overseen by GOL and not the GLA.
102. Ensuring there is equal opportunity in access to training and work is extremely important in an area of increasing diversity. All Partnership members are committed to maintaining our strong track record of community cohesion. However childcare costs here, as in the whole of London, are extremely high and present a major barrier to training and employment. Childcare strategies to reduce the impact of this are vital..
103. The sub-regional Economic Development strategy already contains actions to support BME businesses and SMEs. Each borough's existing economic development or regeneration strategy similarly includes support for SME & BME businesses. It seems unnecessary duplication to encourage each borough to write further strategies when those issues are already covered in existing strategies.
104. Each borough is already contributing to the development of the National 'Changeup' programme which is specifically designed to build the capacity of the voluntary sector to become service deliverers. West London Network has also submitted a sub-regional plan, which the WLA is supporting and making links into sub-regional and regional procurement initiatives.

Response to Action Points

Part two, section 1: Proposed actions 1E – Social Infrastructure		
Point 1	Action	Working with stakeholders, boroughs should ensure that specific provision for these healthcare, education and community needs is included in development frameworks for Opportunity Areas, town centres and major sites in order to achieve sustainable communities.
	Discussion	The Partnership notes that boroughs already consider the relationship of infrastructure and do their best to encourage partners to work with them. This should be in the general text.
	Response	Delete action
Point 2	Action	Some schools have limited scope for expansion and LDFs will need to identify locations suited to new educational facilities in areas where these are anticipated to grow.
	Discussion	This is an important issue – in terms of identifying both possible sites for new schools (or capacity to expand existing schools) and the necessary funding to make it happen. Increasingly, developers will be required to make substantial financial contributions (while central govt. is allocating more funds it is still limited bearing in mind the priority to fund improvements to existing schools) – but this major call on developer funding can impinge on other aspects of the development, eg. the proportion of affordable housing which can be agreed. The prime responsibility to address this issue rests with the boroughs as the local planning and education authorities working as necessary across borough boundaries to open access to any surplus school places. It is not an issue which requires sub-regional action as such.
	Response	Support action - but it should be explicitly recognised that, firstly, it is primarily a matter for boroughs to resolve at the local level and, secondly, the need to secure developer funding to provide this essential infrastructure can make it more difficult to achieve, for example, the affordable housing target in a particular development.

Point 3	Action	Stakeholders are invited to comment on how the final SRDF guidance on higher and further education can be most effectively implemented in West London taking particular account of the issues outlined above.
	Discussion	The SRDF could help by suggesting that all boroughs consider formally acknowledging that student accommodation linked with local Universities can be included in the definition of affordable homes to encourage suitable provision.
	Response	As above

Point 4	Action	Boroughs are asked to ensure that the childcare implications of new development are taken into account when agreements are drawn up; this may entail contributions to revenue as well as capital funding for childcare.
	Discussion	Boroughs already do consider this when assessing new development and it is usually one of many items that need to be negotiated as part of s106 agreements. Securing revenue contributions can be particularly difficult and will always be capped – both financially and in time – so the benefit will only ever be temporary. Boroughs need to judge the weight to give to this against all the other issues to be considered in s106 negotiations. It is also important to bear in mind the implications other policies have on such negotiations, eg. with an increasing emphasis on delivering affordable housing with no public sector grant funding that reduces the willingness/capacity of developers to agree to other major contributions too. Reference to childcare issues should be in the general text rather than as a specific action – as the draft SRDF contains several similar actions in relation to s106 negotiation, it may be appropriate to group them together in the text to list the key issues which boroughs need to consider in their negotiations.
	Response	Delete action, not contentious but a local issue

Part two, section 3: Proposed action 3.1 – Ensuring development brings benefit to communities

Point 1	Action	Boroughs are asked to develop Policy 2A.4 of the Plan through their LDFs, Community Strategies and Neighbourhood Renewal Strategies and to consider whether there are any additional potential Areas for Regeneration that they would wish to see in the review of the London Plan.
	Discussion	This is a local issue which is most appropriately considered in preparing LDFs.
	Response	Delete action

Part two, section 3: Proposed action 3A – Sustainable local economies

Point 1	Action	In their LDFs and Community Strategies, boroughs are invited to consider the linkages between areas of deprivation and access to labour markets and work with TfL and other partners to identify a package of measures to improve the situation
	Discussion	This is a crucial issue and the Partnership welcomes this invitation to work with TfL. However, it is a concern that, for example, the transport investment listed in the SRDF does not highlight the importance of improving transport links between the different parts of West London, eg. by improving orbital links..
	Response	Support action

Part two, section 3: Proposed actions 3B – Securing economic and social inclusion and improving health		
Point 1	Action	The Mayor, with partners, will seek to maximise the benefits of growth to West London’s excluded communities, as identified above, and will assess impacts in annual monitoring reports.
	Discussion	This intention is welcomed but, clearly, the impacts will primarily be assessed at the local community level. It is perhaps more appropriate to state this in the text of the SRDF rather than listing it as an action in such general terms.
	Response	Delete action – the Partnership strongly supports the intention of this but simply questions whether this aspiration is too general to be a specific action - perhaps it is better to note this in the general text.
Point 2	Action	All partners are asked to maximise the potential of the emerging Sub-Regional Economic Development Implementation Plan for West London to address the needs of groups identified above
	Response	Support action
Point 3	Action	In association with the boroughs the Mayor will explore the need for an over-arching sub-regional community strategy to complement and guide Local Strategic Partnership plans and assess the implications for the review of the London Plan.
	Discussion	It is felt that this will create confusion over the role of borough-level community strategies. A more appropriate approach could be to prepare an over-arching document pulling together all the different elements of sub-regional strategies;
	Response	Amend - change to develop a document to show the relationship of, and help co-ordinate, existing and future sub-regional strategies.
Point 4	Action	The Learning and Skills Councils and the London Skills Commission are asked to review their strategies to maximise the engagement of deprived communities and disadvantaged individuals in the economy.
	Discussion	The West London Learning and Skills Council already does this and it is an important part of boroughs’ community strategies and, indeed, the West London Economic Development Strategy.
	Response	Delete action as this is already happening via existing strategies.
Point 5	Action	Boroughs are asked to prepare BME and SME business development strategies with LDA, LSC and Business Link.
	Discussion	This work is already underway in West London. Therefore the action does not add value to supporting existing business development strategies/plans and unnecessarily duplicates existing work.
	Response	Delete action
Point 6	Action	Boroughs are asked to support the development of the voluntary sector as service deliverers, especially in the social care and health fields and to support the development of the social enterprise sector.
	Discussion	Again, this work is already underway in West London. Therefore the action does not add value to support the social enterprise sector and unnecessarily duplicates existing work.
	Response	Delete action
Point 7	Action	Boroughs are asked to co-ordinate the targeting of government and EU resources to build community capacity
	Discussion	The Partnership notes this action should support lobbying of national and international funders so that appropriate resources can be bid for across West London.
	Response	Support and amend to encourage cross-borough working to secure funding

		to build community capacity.
Point 8	Action	Boroughs are asked to produce action plans to support a bottom up approach to community-led regeneration whilst encouraging local and suburban identities.
	Discussion	Such action plans are often related to community strategies which are already facilitated / produced by Boroughs.
	Response	Delete action, duplicates existing processes
Point 9	Action	In reviewing their strategies, boroughs should aim to maximise the potential benefits to the wider determinants of health.
	Discussion	Primary Care Trusts are part of each Local Strategic Partnership and this will already be factored into local plans and strategies.
	Response	Delete action, duplicates existing processes

Transport and accessibility

105. The Partnership provided significant comments to the GLA during the development of the SRDF and is pleased to note that many of the issues raised have been included in the latest draft. Further comments are as follows.
106. The Partnership notes the accurate description of existing and proposed transport services and issues in West London. However, it is a concern that there is such limited recognition of orbital travel issues in the sub-region. It is noted that transport routes in inner West London and from London westwards (ie. towards Heathrow and beyond) are likely to benefit from future upgrades. However, orbital public transport routes are generally poor (with some exceptions), especially in outer West London. While bus services have been improved to provide more frequent orbital links, there are still no long-term orbital transport improvements planned that will bring about fundamental change. The Partnership would like to see the Mayor and TfL identify and plan for future upgrades to improve orbital transport and would want to play a major role in that work.
107. Additionally, the SRDF does not mention the proposed third runway at Heathrow. The effect of a third runway is likely to be very significant in West London, not only on transport issues, but land use, industrial and warehousing demand, community cohesion, air quality, noise and other environmental issues.
108. The SRDF recognises that master planning is necessary to co-ordinate development opportunities with transport upgrades and will be led by TfL with key stakeholders. The Partnership has lobbied for this. The Partnership aims to be directly involved in the development of the plan.
109. Paragraph 141 and 142: The Partnership notes that the major expansion in public transport for West London – Cross Rail and the West London Tram - are predicated on funding being secured, currently there is concern that funds may not be secured for either scheme.
110. Boroughs are concerned that the Transport section does not acknowledge the existing work to encourage green travel plans within the sub-region. The SRDF should recognise the historic and existing work the Partnership and the boroughs do to support and encourage public and green transport modes, leading by example, making green travel a condition of granting future development and encouraging residents to use public transport.
111. The SRDF should include a section on the potential of the Canal network to transport, particularly construction, materials and the need to provide more information that boroughs can use in negotiations with developers to push more strongly for this.

Response to Action Points

Part two, section 2: Proposed action 2E.1 – Transport and accessibility, land use development		
Point 1	Action	Relevant policies regarding transport and development are set out in chapter 3C of the London Plan. In addition, in preparing their LDFs boroughs are asked to have regard to the implications of the phasing table (Annex 3) on the need for higher densities and the creation of sustainable communities (see also Proposed Action 2.1).
	Discussion	<p>The Partnership notes that the purpose of the SRDF is to provide greater clarity and direction at the sub-regional level on the policies in the London Plan. This action fails to add any value to the existing London Plan policies.</p> <p>Additionally, the transport phasing tables provide a very simplistic overview of the phasing of the proposed transport schemes. The information</p>

		provided does not add any value to support the existing transport policies.
	Response	Delete action

Part two, section 2: Proposed action 2E.2– Transport and accessibility, managing demand

Point 1	Action	Relevant policies regarding transport and development are set out in chapter 3C of the London Plan. The Mayor, TfL, boroughs and other strategic partners are asked to use the TfL Business Plan, borough Local Implementation Plans and other delivery mechanisms to support investment in transport, particularly by sustainable modes.
	Discussion	Similar to comments above for action 2E.1, the reference back to the policies in the London Plan, fails to add any value. These plans will be used as a matter of course in preparing strategies. Current plans though focus on radial public transport improvements – it is very important that the crucial need for improved orbital transport links within & through West London begins to be addressed and the SRDF should flag the need for this more fully.
	Response	Delete action

Point 2	Action	In view of the existing high demand and growth expected in the sub-region, particular emphasis should be given to integrating improvements to sustainable modes with appropriate adjustments of parking standards and strategies, reflecting the London Plan approach of lower parking provision for areas where good alternatives to the car are available.
	Discussion	The Partnership notes the action is aiming to encourage some flexibility in parking standards The Partnership notes that these initiatives already exist in the sub-region. In the absence of greater orbital and north-south transport within the sub-region, it will be difficult to reduce the reliance on private cars.
	Response	Delete action

Point 3	Action	TfL are currently exploring how best to develop measures to change travel behaviour and will work with sub-regional stakeholders and government to explore innovative options.
	Discussion	This action is welcome but it is phrased as a statement - it should be amend to read as an action
	Response	Amend wording of the action

Part two, section 2: Proposed action 2E.3 – Transport and accessibility, freight and distribution

Point 1	Action	Working with the London Sustainable Distribution Partnership TfL, boroughs and other stakeholders are asked to promote a collaborative approach to local distribution issues and opportunities, for example through sub-regional freight quality partnerships such as the West London Freight Quality Partnership (WLFQP.)
	Discussion	The fact that the West London Freight Quality Partnership (WLFQP) exists means that there is collaboration already. However the opportunity could be taken here to insert further actions that address emerging issues and take account of changing working practices eg 24 hour working, and encourage the WLFQP to set targets for lowering emissions.
	Response	Support action Amend to include - Boroughs to encourage the WLFQP to set targets for minimising emissions, and to take account of 24 hour working

Part two, section 2: Proposed action 2E.4 – Transport and accessibility, analysis of capacity and accessibility		
Point 1	Action	TfL, in consultation with key stakeholders, will produce an integrated sub-regional transport network plan to ensure a co-ordinated approach to meeting the sub-regions transport needs, which appropriately reflects development planning issues, and to feed into the reviews of the London Plan and the Transport Strategy. As well as reviewing infrastructure needs, this would consider issues such as improving travel information and influencing travel behaviour.
	Response	Support action – the Partnership will want to be centrally involved in helping to produce that plan.

Infrastructure services (waste, water & sewage, land for transport)

112. The main concerns in West London relate to identifying what infrastructure is required, when it is required, how it will be funded and allowing enough lead-in time to ensure services are available when needed. It is noted that these concerns are similar to those for other sub-regions, therefore any learning or best practice that can be applied from elsewhere should be encouraged.
113. Waste is a significant sub-regional issue. The Partnership is aware that the Mayor has just released a draft alteration to the London Plan on waste and minerals. The amount of waste that can be disposed of in landfills has been significantly reduced. Boroughs are now increasingly required to recycle waste or dispose of it by other means. Across West London the existing waste recycling / transfer sites are not sufficient to accommodate the increased waste volumes - more sites are needed (potentially the equivalent of 3.6 hectares each year to 2020).
114. Para 4.10f (last two sentences) of the draft London Plan Waste Alteration makes reference to assumptions about how much land has been identified for potential waste use as part of industrial land demand – and how much additional land needs to be identified. Clearly, industrial land could be the most appropriate for waste use - it would make sense not to include the figure of 40 hectares of industrial land that could be released for other development until more work has been done to assess possible waste site locations (taking into account the type of waste facilities needed) as part of LDF preparation. Funding the provision of these extra waste sites will be a major issue – and may require compulsory purchase.
115. In accordance with European Union/Government policies, the amount of biodegradable waste that is put in landfill must be substantially reduced. Under the Landfill Allowance Trading Scheme boroughs will face substantial fines (£150 per tonne) if these targets cannot be met. The Partnership and the Boroughs are particularly concerned with the lag time to provide more waste sites in West London. These are potentially very significant and would result in substantial increases in Council Tax. The Partnership would like to encourage the Greater London Authority to work with West London partners and stakeholders to assist in identifying and providing for waste facility sites as soon as possible.
116. The West London Waste Authority (ie. Brent, Ealing, Harrow, Hillingdon, Hounslow and Richmond) are currently developing a Joint Municipal Waste Management Strategy, which will cover the West London Waste area (excluding Hammersmith and Fulham). This strategy will set out proposals to substantially increase recycling and composting by the boroughs, and set out a process and evaluation procedure to procure residual waste management treatments by WLWA. The joint strategy will not provide policy guidance on waste disposal, preferred sub-regional methods, possible sites or criteria for site selection. Site selection criteria (and sites) will need to be identified in the SRDF and LDFs.
117. The Partnership notes that the Mayor has identified possible waste facility sites in 'Recycling and Recovery Facilities Sites Investigation in London' document. In addition to these, partners will seek to identify other sites in the Joint Waste Development Plan which would be appropriate for a range of differing treatments.

Response to Action Points

Part two, section 1: Proposed actions 1F.1 – Infrastructure services		
Point 1	Action	Working with other stakeholders Boroughs should, in their LDFs, identify the need for additional infrastructure in sufficient time for it to be provided in association with the phasing of major developments, taking into account the utility infrastructure issues outlined for Opportunity and Intensification Areas in Annex 2.
	Discussion	<p>The provision and timing of infrastructure to support new developments is critical. Not only is it important to identify when new infrastructure is going to be required, but it is also important to identify who is going to provide it.</p> <p>Therefore, the Partnership recognises it has an important role to lobby on behalf of the sub-region for future resources, particularly for opportunity and intensification areas. It is also important to get infrastructure needs within budget forecasts, to ensure utility companies, health, education and social infrastructure providers are aware of what is needed and have enough lead in time.</p>
	Response	Support action but amend to identify also the sub-regional role to support and secure infrastructure needs.

Part two, section 1: Proposed actions 1F.2 – Waste		
Point 1	Action	Stakeholders are asked to respond to the consultation on the draft Alterations to the London Plan in the context of the other issues raised in this SRDF.
	Discussion	<p>It is useful to draw attention to the need to consider the draft alteration and the need for comments on it. However, boroughs are already concerned with the proposed waste alteration and recognise the possible industrial land release target does not include the need for new waste facilities.</p> <p>The boroughs will be responding to the draft alteration when it is open for full public consultation.</p> <p>General consultation on the Draft Alteration to the London Plan on Waste will start at the end of the SRDF consultation period. This action should be deleted as it will not necessarily be relevant in the next draft of the SRDF.</p> <p>The Partnership is aware that boroughs would like assistance on how to protect land for waste facilities, in the absence of controls or assessment criteria in current planning documents.</p> <p>The Partnership recognises that the boroughs are currently working together to develop a joint West London Waste Strategy. To support the development of this document, the Partnership would like to see the inclusion of a relevant action.</p>
	Response	<p>Delete existing action.</p> <p>Replace with a new action that identifies that prior to <u>any</u> industrial / commercial land being released for housing or other purposes, it is assessed to see if it is suitable for a potential waste facility site in accordance with the Mayor's 'Recycling and Recovery Facilities Sites Investigation in London' or any subsequent borough planning controls. However, to have any meaning such an action must be backed up with adequate resources to then be able to secure that land for waste use if it is suitable.</p>

Part two, section 1: Proposed actions 1F.3 – Water and sewage		
Point 1	Action	Working with other stakeholders Boroughs are asked to take into account the guidance in Table 1F.2, Annex 4 and Annex 2 when preparing their LDFs and Development Frameworks.
	Discussion	The lead in text to this action notes that there are no substantive sub-regional issues. It is noted that the boroughs are aware of the need to manage infrastructure provision and consider it during the development phase of any development. Therefore, the Partnership and Boroughs do not consider that this action is needed.
	Response	Delete action.

Part two, section 1: Proposed actions 1F.4 – Land for transport		
Point 1	Action	Working with other stakeholders boroughs are asked to ensure that specific provision for the infrastructural needs set out above and in the forthcoming SPG is included in development frameworks for Opportunity areas, town centres and major sites. These should be included in LDFs.
	Discussion	Similar to the comments above, the Partnership does not consider a separate action is necessary as it reiterates the need for integrated and sustainable development mentioned throughout this document. This action is very similar to others in the SRDF and does not add any value.
	Response	Delete action

Environment (sustainable development/construction/energy, air quality, noise, open space, blue ribbon network)

118. The Partnership is pleased to see the attention paid to this area, setting out why it is important to invest in both existing and future building from a design perspective and also how important it is to factor good quality public realm into development proposals.
119. The question of how to fund public realm improvements (Question 4a) is not a simple one to answer. Opportunities to make external funding bids for exemplar projects, s106 funding, a borough's own resources and designating BIDs are all currently being looked into.
120. The 'green and clean' agenda is already part of mainstream delivery across several of the London boroughs.
121. The air quality and noise section might be better placed alongside the transport section, as road transport is one of the main causes of poor air quality and high noise levels.
122. The draft SRDF needs to recognise more strongly the issue of climate change. Boroughs could be asked, in the context of their LDFs, to consider their position in relation to the 'Nottingham Declaration'.

Sustainable development, construction and energy

123. The section discussing sustainable development, construction and energy contains a lot more detail (ie. technical specifications) than the rest of the SRDF. The SRDF is not a design standards delivery document – rather it should highlight the main sub-regional issues and potentially how these might be addressed. Therefore, the Partnership does not believe that the detail included is necessary.
124. Paragraph 179: care also needs to be taken over the siting of biomass fuelled CHP plants and associated developments to ensure that these do not impact adversely on noise and air quality.

Air quality and noise

125. Paragraph 152 (transport section) refers to the increase in activity that will lead to a growth in road traffic but there is no mention of the impact of increased traffic on air quality and the need to include low emissions targets in future plans. Although the impact on air quality of air traffic growth at Heathrow is mentioned, dealing with the implications of worsening air quality is a major challenge for West London and the SRDF should make stronger reference to this.
126. The section on air quality does not make any reference: to the Mayor's existing air quality strategy or the ambient noise strategy, 'Sunder City' or PPS23 Pollution Control, Air and Water Quality.
127. Although the section mentions that the boroughs each have Air Quality Management Areas, the SRDF is also the ideal opportunity to promote the fact that each AQMA looks to the planning system to control future emissions
128. It should be stated that even with the need for increasing densities and a mix of uses, the importance of ensuring that people, particularly sensitive groups, do not have to live close to noise generators and areas of poor air quality.
129. The SRDF should take the opportunity to show that the sub-region is keen to demonstrate good practice in protecting and improving the environment and in establishing plans and developing protocols for:
- looking at 'cumulative impact' and how best this could be measured.
 - using cross-boundary s106 agreements

- quantifying and reducing air quality and noise emissions rather than simply mitigate against them in new developments
- establishing exemplar projects, eg. for energy efficiency of all sorts and improving existing suburban housing.

129. Open space and the blue ribbon network – the SRDF places greatest significance on the larger areas of open space. This is understandable in a sub-regional document but the crucial importance of small parks and play spaces must also be recognised – particularly as they are usually the closest to people’s homes and are those most often visited on a daily basis. With increasing densities, the importance of these smaller areas of open space increases even more. It is also important that new developments make proper provision for both active and passive play.
130. The Green Arc approach is welcomed – and this could link with open space areas just outside London too.

Response to Action Points

Part two, section 4: Question 4A – Ensuring development improves the environment		
Point 1	Action	Stakeholders are asked to identify what, if any, detailed distinct sub-regional actions are required on conservation, design and public realm matters in the final SRDF.
	Discussion	Linked with the West London Economic Development Strategy, the Partnership is leading an initiative to establish a West London Sustainable and Urban Design Forum drawing on and extending best practice. This work will be done in liaison with Urban Design London. The GLA is invited to support this initiative and the Partnership welcomes a detailed discussion with the GLA on tangible ways in which such support could be given.
	Response	As per discussion above

Part two, section 4: Proposed actions 4B – Sustainable development, construction and energy		
Point 1	Action	Boroughs and developers are asked to include the above targets when preparing LDFs and in considering applications.
	Discussion	The LDFs (as the successor to UDPs) will contain detailed information or reference to relevant development, environmental and energy efficient standards. Therefore, it is not necessary for the SRDF to refer to this. as a specific action.
	Response	Delete action

Point 2	Action	Boroughs are asked to include policies to minimise the visual and noise impact of renewable energy schemes. They should also foster community involvement as much as possible when considering these schemes.
	Discussion	The boroughs assess visual and noise effects of renewable energy resources in development applications. However, the Partnership acknowledges that in order to promote and encourage sustainable energy use, there may have to be a slight trade-off between visual amenity and environmental quality and sustainability. The SRDF should identify that to achieve better quality environments, innovative ways should be encouraged to integrate renewable energy systems in developments. The SRDF should also acknowledge that there needs to be more emphasis on achieving greater environmental gains.
	Response	Delete action Replace with an action supporting energy efficiency schemes with careful siting and the use of renewable resources within the sub-region

Point 3	Action	The Mayor will work with Boroughs and the LDA to define Energy Action Areas to showcase low carbon communities that demonstrate a range of energy technologies and techniques.
	Discussion	The Partnership supports this initiative - effective and high quality examples are needed in West London in order to encourage developers to apply new technology,
	Response	Support action

Part two, section 4: Proposed actions 4C – Air quality and noise

Point 1	Action	Boroughs are invited to consider possible actions that can be included in their community strategies and LDFs to mitigate the effects of local generators of air pollution and noise.
	Discussion	All partners are asked to consider that community strategies and LDFs state that future development is appropriately located to minimise noise disturbance to residents, mitigate against noise pollution and to minimise emissions. The major air pollution sources are Heathrow airport and the major road network. It is noted that there is very little boroughs can do in the short term (other than by restricting development) to reduce substantially air and noise pollution from these sources as effective transport is needed for the vitality of West London and London as a whole. Building siting, design and orientation can, in some circumstances, help alleviate noise and air quality problems.
	Response	Delete action and replace with an action to identify in greater detail the impact of Heathrow on air and noise quality, the environment and congestion, as well as an action encouraging partners to collaborate on a full Environmental Impact Assessment of Terminal 5, once it is operational, to inform decisions about Runway 3.

Part two, section 4: Proposed actions 4D – Open space and the Blue Ribbon Network

Point 1	Action	The Mayor will work with boroughs and other partners in helping to identify an area of search to meet the deficiency in access to Regional Parks as set out above.
	Discussion	The Partnership and boroughs are willing to examine this issue but are currently unsure as to where in West London a regional park could be established with good accessibility. How a Regional Park would be funded is also an important issue to consider at the outset.
	Response	Support action

Point 2	Action	In their LDFs boroughs are asked to set out proposals to meet deficiencies in access to Metropolitan and District Parks and to take forward the Green Arc approach.
	Discussion	A West London open space strategy would encourage greater cross-borough working and more integrated policies.
	Response	Delete action but reword to encourage West London partners and stakeholders, boroughs and regional government bodies to develop an open space strategy for the sub-region building on existing borough-level strategies.

Point 3	Action	In their LDFs boroughs should identify Areas of Deficiency in access to nature and aim to address these through planning policies.
	Discussion	This is already established planning policy but simply identifying areas of open space deficiency may not improve the provision for open space. While, of course, additional open space needs to be provided particularly in areas of deficiency, this should not deflect from a potentially greater need to promote better use and enhance existing open space and nature areas to

		encourage greater public use. Additionally, boroughs should be encouraged to promote better security and natural surveillance of areas to ensure public safety is improved within these areas.
	Response	Delete action but replace with action encouraging better use of existing areas as well as seeking opportunities for new areas of both 'hard' and 'soft' public space

Point 4	Action	LDFs should seek to protect boatyard operations and implement the relevant parts of the proposals in the Hampton-Kew and Kew-Chelsea strategies.
	Response	Delete action as this is a local issue

Opportunity Areas

131. The five Opportunity Areas and one Area for Intensification are expected to accommodate most of the predicted jobs growth in the sub-region (70,000 extra jobs and nearly 9,000 homes). The Partnership recognises that the level of development within these areas needs to be planned in a collaborative way, as they either cross borough boundaries or will impact on areas outside London. Boroughs are attempting to manage these sites while including all relevant stakeholders and partners.
132. Annex 2 attempts to set the context for each area. Before commenting and providing a position statement on each area, the Partnership would wish to make some overall comments relating to the approach (albeit it is accepted that the SRDF is re-stating London Plan targets):
- with the exception of Park Royal, the Partnership does not support using the SRDF to define the boundaries of these Areas – this is more appropriately done in the context of the LDFs (in consultation with the GLA) with boroughs collaborating (under the umbrella of the Partnership) to agree the areas where they cross borough boundaries. Defining those boundaries now in the SRDF risks cutting across the LDF statutory consultation process. Park Royal is an exception to this as its boundary has long been established – but the boundary shown in the draft SRDF is incorrect;
 - it is important that the London Plan targets for these Areas are interpreted flexibly and the SRDF needs to make this clear – in some Areas, those targets could be over-ambitious, while in others they under-estimate the capacity. For example, the Heathrow North Opportunity Area is projected to accommodate 50% of the jobs growth within these Areas and 66% of the new homes target. The largest development site in this Area is the former Southall Gas Works (30 hectares). Much of the growth aspirations for this Opportunity Area rest on successfully developing this site but, with substantial access & other constraints, this is not at all certain at this stage. On the other hand, Wembley can accommodate a greater number of homes than the London Plan target of 400 - planning permission has been granted for 3,700 homes and there could be capacity for up to 5,000 in total;
 - the Partnership is happy to see a summary of key issues, development principles and indicative phasing in the final SRDF but these need to be produced in full collaboration with the Partnership, boroughs and key landowners. The current drafts need substantial changes. This Response does not include suggested changes – however, an update on progress in each area is set out below;
 - under the Partnership's umbrella, a West London Planning Group is being tasked to co-ordinate the collaborative work needed on each Opportunity Area to promote a consistent approach (and the GLA is invited to participate in this) while not seeking to constrain local flexibility and detailed partnership working with the key interests in each area;
 - in terms of promoting sustainable communities, a key concept must be that the new job opportunities in these Areas must be easily accessed – in terms of physical transport access and job skills match - by residents in the surrounding areas of disadvantage. Other than in a very general way, the SRDF does not seem to address that concept but it is fundamental for the boroughs and the Partnership generally. Work is underway on this within West London (it is a key focus of the West London Economic Development Strategy for example) but support is needed from the GLA 'family' for specific programmes and especially in relation to improving transport links between these areas;
 - this is more a subject for the London Plan Review but the key economic position of Heathrow in the west of the sub-region (matched by Park Royal in the east) should perhaps be recognised by actually including the Airport itself within an Opportunity Area (as well as a Strategic Employment Location as is suggested earlier in this response). Questions are raised about the value of designating the Heathrow South Area but there is an argument for saying that both economic drivers in West London – Park Royal and

Heathrow – should be part of an Opportunity Area rather than just Park Royal as currently.

Response to Action Points

Part two, section 2: Proposed action 2B – Opportunity Areas and Areas for Intensification		
Point 1	Action	The Frameworks for White City, Wembley, and as far as possible Park Royal, should be refined and implemented as soon as practicable and principles to guide development of frameworks for the Areas north and south of Heathrow should take into account the contents of this SRDF.
	Discussion	<p>The Partnership recognises that to effectively manage increased development in the opportunity and intensification areas, an overarching planning document for each is necessary. It is noted that for areas the cross borough boundaries (i.e. Park Royal) an integrated planning approach is even more essential to encourage joined up working.</p> <p>The Partnership notes that it is important for infrastructure and service providers to be aware of such plans for these areas, to ensure future needs are identified (i.e transport provision by TfL).</p> <p>The Partnership supports the action but wishes the GLA to note that more rapid progress is likely to have resource implications.</p>
	Response	Support action.

Questions 2B		
Point 1	Action	<i>Stakeholders views are sought on the issues to be addressed in order to effectively implement strategic and local policy for West London's Opportunity and Intensification Areas, including refinements to actions, phasing and boundaries, as outlined in Annex 2 and elsewhere in this SRDF.</i>
	Discussion	As discussed above

Questions 2B		
Point 2	Action	<i>Stakeholders views are also sought on the proposal to extend the boundaries of the Frameworks more widely in order to effectively integrate and benefit the hinterlands of these Areas.</i>
	Discussion	As discussed above

Partnership Update on Progress in each Area (NOTE: drafting to be completed)

Wembley Opportunity Area

Position Statement

The transformation of Wembley into a national and international sport and leisure icon is well underway. The new 90,000 seat National Stadium opens next year as the centrepiece with planning permission granted for a major mixed use development surrounding it. Public transport access will be radically improved. The pace of change is rapid and the reality of what is happening at Wembley truly lives up to the original vision for the area first put forward by Brent Council.

The development includes:

- 3,700 homes (with a potential capacity for up to 5,000 homes);
- [...]sqm. of new shops and restaurants
- a refurbished Wembley Arena
- a multi-screen cinema
- a new school
- new health and community facilities
- employment and training initiatives
- public transport and road access improvements
- potential for over 6,000 new jobs.

In addition, it is hoped that Wembley can also accommodate:

- an International Conference and Convention Centre
- a major University
- a state of the art public library
- a new Civic Centre
- a 'super casino'.

This far exceeds the growth targets for the area set out in the London Plan. It will more than live up to its designation as a Strategic Cultural Area.

Brent Council and the LDA are spearheading the work to ensure that the benefits of this huge investment flow also to the wider Wembley area and to local residents. Wembley Town Centre will Land has been acquired to link directly the new Stadium development to the town centre. A target has been set of encouraging [xxx] new business start-ups and the aim is that [xx]% of the new jobs will be taken by local people.

The boundary of the Area indicated in the SRDF [...reflects the working boundary being used currently and that being proposed in the Brent LDF....].

Key issues remaining to be resolved include:

- (to be drafted)
-
-
-
-
-
-

White City Opportunity Area

Position Statement

Although this is the smallest Opportunity Area in West London, it has a substantial capacity to provide new jobs with its good public transport and trunk road accessibility. It sits at the end of the West London Tram route.

A planning framework, jointly prepared by the GLA and LBHF, has increased the size of the area from 33 hectares (as originally suggested in the London Plan) to 50 hectares. The landowners have commissioned a master plan for the available land within the Opportunity Area. This should be completed by [..date..] and is likely to propose:

-
-
-
-

This is on top of the substantial office development completed by the BBC and the retail and residential development currently under construction – these first phases of development will provide:

- over 100,000sqm. of new offices and broadcasting space
- a new media centre
- leisure uses
- over 100,000sqm. of retail floorspace
- [xxxx] homes
- 4,000 new permanent jobs (CHECK)
- Underground and bus station improvements and new facilities, including a new station on the Hammersmith & City line.

The work is being led by [.....] with the close involvement of [.....]

Many studies are needed to test the capacity of the area but, at this stage, it is envisaged that the jobs and homes target in the London Plan (11,000 jobs and 1,200 homes) can be met – and possibly exceeded..

Future phases of the development should be less reliant on private car access.

Key issues remaining to be resolved include:

- (to be drafted)
-
-
-
-
-

Park Royal Opportunity Area

Position Statement

One of the largest industrial and business areas in London, the regeneration is spearheaded by Park Royal Partnership, led by the private sector and with the close involvement of the three boroughs (Brent, Ealing and Hammersmith & Fulham) & the LDA. Since its launch in the early 1990's, Park Royal Partnership has secured substantial public sector investment in transport and environmental improvements together with skills training and business development programmes. This has been more than matched many times over by the private sector investment in new business, industrial, storage and retail space plus new homes. The redevelopment of Central Middx. Hospital, in the heart of the area, has also played a major part in the regeneration, releasing land for new business space to fund comprehensive healthcare improvements. The Hospital is also one of the largest employers in the area, together with some major food manufacturing businesses. The net result has been an increase ofjobs within Park Royal – an increase of ..% since 1990.

However, much remains to be done. The preservation of industrial land in Park Royal is paramount. Despite the general decline in manufacturing a number of production activities, particularly food and drink production, continue to have a considerable and growing presence in Park Royal. Other growing sectors such as TV/Film and logistics and distribution will require a good mix of industrial/warehouse space for the foreseeable future. If Park Royal is to continue its function of servicing the markets of central and West London, a ready supply of land for industrial uses needs to be available. However, there may be a case for a limited and measured loss of industrial land for mixed use in Park Royal. This is likely to be largely in Park Royal 'Gateway' sites that enjoy good public transport accessibility. This needs to be tested in the context of a new Area Planning Framework for Park Royal, plans for which are currently being put in place. It should be recognised that Park Royal's attractiveness to business and investors needs to be maintained through the provision of suitable local amenity, including Class A uses, leisure and possibly keyworker housing where this can be justified.

The suggestion in the draft SRDF that there is a fragmented approach to regeneration is not accepted. There is a comprehensive approach – as is clear from the Park Royal Regeneration Strategy published in 2002. However, it is accepted that the area is 'fragmented' - because of its geography, its position in relation to the main road network and, crucially, the Underground and mainline stations which encircle its periphery. As correctly identified in the SRDF document improving public transport accessibility is vital to continuing the economic and employment role played by Park Royal. The Park Royal planning framework will set out priorities for improvements in local access and overall transport capacity.

The boundary of Park Royal is long-established and the plan in the SRDF needs to reflect this. This includes the Willesden Junction Intensification Area – so this should be included in the Opportunity Area (see the later comments on that Intensification Area).

The focus of current work in the area is:

- addressing issues which constrain business competitiveness, including running targeted skills training programmes geared to the needs of specific businesses;
- improving public transport accessibility to, and within, the area;
- improving the physical environment;
- improving traffic management and parking;
- promoting local supply networks;
- attracting new business investment for both large and small development sites;
- identifying suitable local sites for waste management operations to serve businesses in Park Royal and London.

It is hoped that work on a new Planning Framework for Park Royal can commence in late 2005 and report back in mid-2006. This will draw on a number of local industrial supply and demand studies plus the Supplementary Planning Guidance on Industrial Capacity for London.

Heathrow South Opportunity Area

Position Statement

This draft SRDF notes the questioning by some of the value of this being designated an Opportunity Area. The original proposals have been for three small distinct areas to comprise this Opportunity Area – Hounslow and Feltham town centres plus Bedfont Lakes Business Park. These do not form a cohesive unit – economically or geographically – and, therefore, the value of the Opportunity Area designation does need to be discussed further between Hounslow Council and the GLA.

One way forward may be to designate a larger Heathrow Opportunity Area incorporating the ‘Heathrow City Growth’ area programme spearheaded by BAA and Southall Regeneration Partnership. This could encompass the Heathrow South Opportunity Area as well as, as is suggested tentatively earlier in this Response, the actual Airport too. There could also be advantage in including the ‘Golden Mile’ in Brentford to establish an Opportunity Area in the west of the sub-region to match the large Park Royal Area in the east. This would also serve to highlight the economic importance of the Airport itself and the area surrounding it.

Final decisions on this need to be taken in the context of the LDFs being prepared by Ealing, Hillingdon and Hounslow, the Brentford Area Action Plan (by Hounslow) ,as well as the principle being considered in the London Plan Review.

Current action in Hounslow and Feltham town centre and Bedfont Lakes Business Park can be summarised as:

- Hounslow Town Centre is undergoing significant expansion with
- Feltham Town Centre is
-
- planning permission has been granted for a hotel and residential development at Bedfont Lakes but opportunities for further development there are limited without major new investment in public transport;
-

Key issues remaining to be resolved include:

-
-
-
-
-
-

Heathrow North Opportunity Area

Position Statement

This Area is projected to accommodate 50% of the jobs growth in all of the Opportunity Areas and 66% of the new homes target. The largest development site in this Area is the former Southall Gas Works (30 hectares). Much of the growth aspirations for this Opportunity Area rest on successfully developing this site but, with substantial access & other constraints, this is not at all certain at this stage. Moreover, the employment projections fail to take account of the changing nature of employment in this area and the major change which has taken place from manufacturing to warehousing and other low level job generators. The feasibility of these indicative targets is, therefore, still to be established and these factors must be taken into account in revising projected jobs growth as part of the London Plan Review.

The boundary of this Area currently focuses on the Hayes Industrial Corridor but should be extended. It would be useful if the boundary includes the Heathrow City Growth area (extending the area east and south) where a programme of business competitiveness, skills and infrastructure development is designed to link areas of deprivation more effectively with the economic opportunities in the whole Heathrow area. It is also suggested that there could be value in including either all or part of the current Heathrow South Opportunity Area to create one Heathrow Opportunity Area (which might also include the Airport itself as the key economic driver).

The Area includes the former Southall Gas Works – one of the largest potential development sites in West London – and there is a current planning application for 4,500 homes plus a range of other uses. The feasibility of these proposals is currently being assessed by Ealing and Hillingdon Councils. The homes target appears to place a heavy reliance on this site being developed but whether it can is not known at this stage as there are many planning issues to be addressed.

Key issues remaining to be resolved include:

- establishing the feasibility of, and securing landowner agreement to, access proposals to open up development of the former Southall Gas Works in Southall;
- formulating proposals and securing sufficient investment in social and community infrastructure to support the population growth envisaged;
- establishing the feasibility of the jobs growth projection in relation to available development opportunities and economic drivers;
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Willesden Junction Intensification Area

Discussion:

This area is dominated by major rail lines and operational rail maintenance uses, together with industrial and storage uses. A small area of housing forms the north-west part of the area and the European Rail Freightliner Terminal lies just to the west of that. It does form part of the Park Royal Regeneration Area although it is not well linked physically to the main part of Park Royal. The relative isolation of industrial part of the area from any housing has attracted open storage and waste handling uses. However, planning permission has also recently been granted for a modern waste recycling plant transporting materials via the canal which runs through the area.

The key to the future of this area lies in the future of the operational rail land and Old Oak Common Sidings in particular. This provides maintenance sheds for Heathrow Express and other rail networks. It may be needed in relation to CrossRail services too. If substantial tracts of this land can be released from operational rail use then the area could have significant development potential with appropriate public transport (bus and rail) access improvements. The land to the north around Willesden Junction Station could also be used more intensively but that area faces the major constraint of the configuration of, and securing access across, existing rail lines. Initial plans for this area were based on projections that Willesden Junction would become a much larger passenger interchange but, regrettably, this is no longer the case and plans need to be re-examined. The 3,600 jobs growth projection is almost certainly over-optimistic and the potential of the area to accommodate 500 new homes is seriously questioned.

If proposals for more intensive development even were feasible, many of the existing storage and waste uses may need to be relocated. These are necessary uses which, if moved from here, have to find alternative locations which can be difficult and expensive given the need for environmental safeguarding. The area could be suitable for logistic uses.

Improving the links between this area and Harlesden town centre should be explored..

It can be argued that there is little benefit in treating this as an area for intensification in its own right. It forms part of Park Royal (as reflected in the boundary used by Park Royal Partnership) and should be treated as an intrinsic part of the wider Park Royal Regeneration Strategy (with appropriate amendments to the boundary of the Park Royal Opportunity Area).

Key issues to be resolved if the area is to be suitable for more intensive use include:

- the feasibility of improving road accessibility and public transport services to the area
- potential relocation requirements of existing industrial uses;
- Network Rail's (and rail operators') views on development of Old Oak Common Sidings (releasing all or part of it from operational rail use)
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Appendix 1 – Composite table summarising response to Draft Actions

Draft Sub Regional Development Framework (June 2005)		
Composite Action table – actions supported, amended, replaced, encouraged or deleted by WLP response		
Action Reference	Summary Response	Core Action
Part one: Core Actions		
Point 1	Support, amend	Boroughs, West London Partnership and Business and other stakeholders are asked to use the consultation process on this draft SRDF to agree the above direction for West London and to commit to aligning their own plans to that direction.
Point 2	Support, amend	Boroughs, LDA, and TfL should produce, at the earliest opportunity, planning frameworks for key development areas to develop the agreed direction, to maximise the use of improvements in public transport capacity, and provide the framework for sophisticated management of change.
Point 3	Support, amend	Stakeholders are invited to re-affirm their willingness to act in partnership to deliver the targets and commitments in this SRDF and agree timescales for implementation. Partners are invited at this stage to comment on what has worked well so far and on those areas where specific improvements are needed with a view to resolving them in the final document.
Point 4	Support	Stakeholders are asked to use the consultation processes on all the SRDFs and the Regional Spatial Strategies to improve co-ordination of cross-boundary issues.
Point 5	Support, encourage	Stakeholders are invited to identify sub-regionally distinct indicators to refine and target the existing London Plan based monitoring process.
Point 6	Support	Stakeholders are asked to re-examine cross border economic flows and identify locations where growth can be accommodated in the most sustainable way.
Part two, section 1: Proposed actions 1A – Housing		
Point 1	Delete	In light of the GLA Housing Capacity Study, boroughs are asked to programme the release of identified capacity at borough level. They should check in particular against actions below for the release of industrial land, priorities for the intensification of Town Centres and the phasing of public transport developments and improvements. (See also Sections 1G and 2).
Point 2	Delete	Partners should bring forward development frameworks on key sites where the transport infrastructure can cope, building in the need for social and other infrastructure, setting minimum standards for higher densities and specifying appropriate housing size mix and mixed use priorities. (See also Sections 1E, 1F and 5).
Point 3	Delete	Boroughs should consider the involvement of the public sector, including other partners in site assembly and other interventions.
Point 4	Delete	Boroughs should identify and programme necessary site preparation.
Point 5	Support, amend	Boroughs and other stakeholders including the GLA group are invited to establish a coordinated system to monitor and manage the issues outlined above across the sub-region.
Point 1	Comments made - No	Is stronger guidance needed for the provision of more affordable housing in the areas that are under-performing and /or the development of a West London consortium approach to the provision of affordable housing?

Part two, section 1: Proposed actions 1B - Employment and Offices		
Point 1	Support	The Mayor will work with LDA, boroughs and other stakeholders to protect and enhance viable, affordable provision for SMEs in appropriate locations, and, through the Sub Regional Economic Development Strategy and Implementation Plan ⁱⁱ , to meet their specific needs for business support and training (see also Section 3).
Point 2	Support, amend	In light of the national requirement to justify retention of commercial and industrial capacity and the need to accommodate new sustainable communities, the sub-regional market analysis must continue to be tested rigorously through strategic and local monitoring, carried out by the Mayor and partners, with a view to managing the existing stock more efficiently to meet identified commercial and industrial needs and to release surplus capacity for housing and other priority uses.
Point 3	Support, amend	Boroughs and other partners should promote the consolidation and re-positioning of the sub-regional office market in appropriate, viable locations and achieve wider planning objectives including town centre renewal and increased housing provision (see also Section 5).
Point 4	Support	In partnership with the LDA, boroughs are asked to facilitate the implementation of the Mayor's EDS through the coordination of Sub-regional Economic Development Implementation Plans.
Part two, section 1: Proposed actions 1C - Retail		
Point 1	Delete	When making provision for anticipated retail demand in LDFs, boroughs should take into account the sub-regional and borough need for new comparison retail floorspace to 2016 indicated in Table 1C.1, the indicative baseline need for new convenience floorspace to 2016 in Table 1C.2 and the town centre expressions of need identified in Section 2 and Annex 1.
Point 2	Delete	Boroughs are asked to undertake detailed assessments of need for new retail space and especially for convenience goods. In addition to quantitative needs, these assessments should take into account qualitative need including the complexion of the existing retail offer, under/over-trading and accessibility.
Point 3	Support	Boroughs are asked to verify the pipeline of convenience goods floorspace, including the strategically significant proposals in Table 1C.3 and consider these in light of local assessments of need and the sequential test.
Point 4	Support	Boroughs and other stakeholders are invited to join with the Mayor in identifying areas where reconciliation of retail need and capacity requires coordination both within the sub-region and between West London and its neighbours including those beyond the London boundary.
Part two, section 1: Proposed actions 1D.1 – Culture, Leisure and Tourism		
Point 1	Support, amend	Boroughs are asked to consider the need to accommodate future growth in cultural and leisure services (including strategic provision where appropriate) which meets the needs of all groups in the community and encourages community cohesion, including creative industries. Growth should be accommodated in line with the Mayor's Culture Strategy and the locations identified in Section 2. The unique offer of the Strategic Cultural Area at Wembley should be sustained and enhanced.
Point 2	Support	In exploring the spatial implications and potential for increasing provision of visitor related facilities in the sub-region and tourist-related clusters, Boroughs are asked to have regard to the West London Tourism Strategy and Action Plan. This will include capitalising on proximity to facilities outside the sub-region, and building on West London's strengths in creative industries and specialist retail.
Part two, section 1: Proposed actions 1E – Social Infrastructure		
Point 1	Delete	Working with stakeholders, boroughs should ensure that specific provision for these healthcare, education and community needs included in development frameworks for Opportunity Areas, town centres and major sites in order to achieve sustainable communities.
Point 2	Support	Some schools have limited scope for expansion and LDFs will need to identify locations suited to new educational facilities in areas where these are anticipated to grow.

Point 3	Comments made	Stakeholders are invited to comment on how the final SRDF guidance on higher and further education can be most effectively implemented in West London taking particular account of the issues outlined above.
Point 4	Delete	Boroughs are asked to ensure that the childcare implications of new development are taken into account when agreements are drawn up; this may entail contributions to revenue as well as capital funding for childcare.
Part two, section 1: Proposed actions 1F.1 – Infrastructure services		
Point 1	Support, amend	Working with other stakeholders Boroughs should, in their LDFs, identify the need for additional infrastructure in sufficient time for it to be provided in association with the phasing of major developments, taking into account the utility infrastructure issues outlined for Opportunity and Intensification Areas in Annex 2.
Part two, section 1: Proposed actions 1F.2 - Waste		
Point 1	Delete, replace	Stakeholders are asked to respond to the consultation on the draft Alterations to the London Plan in the context of the other issues raised in this SRDF.
Part two, section 1: Proposed actions 1F.3 – Water and sewage		
Point 1	Delete	Working with other stakeholders Boroughs are asked to take into account the guidance in Table 1F.2, Annex 4 and Annex 2 when preparing their LDFs and Development Frameworks.
Part two, section 1: Proposed actions 1F.4 - Land for transport		
Point 1	Delete	Working with other stakeholders boroughs are asked to ensure that specific provision for the infrastructural needs set out above and in the forthcoming SPG is included in development frameworks for Opportunity areas, town centres and major sites. These should be included in LDFs.
Part two, section 1: Proposed actions 1G – Industry and warehousing		
Point 1	Delete	Stakeholders views are sought on the broad analysis of prospects for the West London 'industrial' sectors set out above and whether any further evidence is to be taken into account in developing the sub-regional approach.
Point 2	Delete	Boroughs are invited to test the monitoring benchmark proposed for the sub-region for inclusion in LDFs in light of the need to ensure that adequate land exists to maintain the long term viability of the economy.
Point 3	Delete	Boroughs are asked to programme the release of identified land using the principles above for inclusion in LDFs and development frameworks.
Point 4	Delete	Boroughs and other partners are asked to draw up proposals for relocation as appropriate in association with the LDA.
Point 5	Delete, replace	Boroughs and stakeholders are asked to demonstrate how it is intended to take a more positive and proactive approach to accommodating warehouse provision in appropriate locations, including identifying those which are particularly suitable.
Point 6	Delete	Stakeholders are asked for their views on the proposal that, in the medium to long term, London's wholesale market functions could be consolidated on multi-purpose markets located at New Spitalfields, New Covent Garden and Western International. This may require maintenance or extension of existing market capacity at Western International, subject to testing through the SRDF process and strategic as well as local assessments.
Point 7	Delete, replace	See also the proposal for SELs in proposed Action 2D.
Point 8	Support	Pending Alterations to the London Plan boroughs should not release significant industrial sites (generally over 0.5 ha) until these are tested against strategic and local needs and policies for waste management facilities.
Point 9	Support	Boroughs and other stakeholders including the GLA group are invited to establish a coordinated system to monitor and manage the release of industrial land within the sub-region.
Part two, section 2: Proposed actions 2.1 – Allocating Growth spatially		
Point 1	Delete	The Mayor proposes to develop more detailed phasing plans in conjunction with the LDA, TfL, the boroughs and other stakeholders (see Action 2E.1).

Part two, section 2: Proposed actions 2.2– Allocating Growth spatially		
Point 1	Support	The Mayor will convene annual sub-regional monitoring meetings for all partners to assess progress, to discuss future plans and to agree further actions as necessary.
Point 2	Delete	In preparing their LDFs and in considering planning applications, boroughs should fully reflect the need for increased densities and seek to encourage them wherever appropriate.
Part two, section 2: Proposed actions 2A – West London Town Centre Network		
Point 1	Delete	When making provision for anticipated retail demand in LDFs, boroughs should take into account the borough level expression of comparison and convenience goods floorspace requirements to 2016 and the indicative level of comparison floorspace need for Metropolitan and Major Town Centres set out above and for District centres and 'residual' requirements provided in Annex 1.
Point 2	Delete	Working with strategic partners and neighbours, boroughs should identify capacity and make provision for 'residual' growth in town centres where it can best enhance consumer choice, enhance existing vitality and viability and is most accessible by public transport. In general this is likely to be mostly in Major and Metropolitan centres.
Point 3	Support	Boroughs and other stakeholders should coordinate large scale leisure, retail and related developments to avoid compromising strategic objectives for the town centre network as a whole, including sustainable access to goods and services for residents, workers and visitors.
Point 4	Delete	The town centre network as set out in Annex 1 will be reviewed in light of strategic assessments of need and capacity, town centre health checks, strategic and local objectives.
Point 5	Support, amend	In light of local circumstances boroughs are asked to test and refine the broad office action and locational typology summarised above and detailed in Annex 4, Table 2A.1 to inform the review of the London Plan and the preparation of LDFs.
Point 6	Delete	In responding to this consultation boroughs and other stakeholders are asked to indicate how they propose to develop the cultural and leisure roles of the town centre network in accordance with Mayoral and sub-regional strategies.
Point 7	Delete	More specifically, Boroughs are asked to work with strategic and local partners to explore how future growth in the night-time economy might be accommodated in appropriate centres supported by coordinated and sensitive management practices.
Point 8	Delete	Boroughs and other stakeholders are asked to have regard to the West London Tourism Strategy and Action Plan, and indicate in LDFs where they hope to bring forward hotel development capacity to support strategic hotel dispersal policy.
Part two, section 2: Proposed action 2B – Opportunity Areas and Areas for Intensification		
Point 1	Support	The Frameworks for White City, Wembley, and as far as possible Park Royal, should be refined and implemented as soon as practicable and principles to guide development of frameworks for the Areas north and south of Heathrow should take into account the contents of this SRDF.
Questions 2B		
Point 1	Comments made	Stakeholders views are sought on the issues to be addressed in order to effectively implement strategic and local policy for West London's Opportunity and Intensification Areas, including refinements to actions, phasing and boundaries, as outlined in Annex 2 and elsewhere in this SRDF.
Point 2	Comments made	Stakeholders views are also sought on the proposal to extend the boundaries of the Frameworks more widely in order to effectively integrate and benefit the hinterlands of these Areas.
Part two, section 2: Proposed actions 2C – The suburbs		
Point 1	Support, amend	Boroughs are asked to take forward the proposals in the Tomorrows Suburbs toolkit in order to assess and encourage activities that sustain economic and community vitality.
Point 2	Support	Boroughs and developers are asked to take into account the analysis of the suburbs above when preparing LDFs and drawing up applications, and link with proposals in the forthcoming SREDIP (see Action 3B).

Part two, section 2: Proposed action 2D – Strategic employment locations		
Point 1	Delete, replace	Boroughs and other relevant stakeholders are asked to comment on the location and indicative boundaries of SELs (Annex 2) and are encouraged to identify Locally Significant Industrial Sites in light of local and strategic industrial demand assessments.
Part two, section 2: Proposed action 2E.1 – Transport and accessibility, land use development		
Point 1	Delete	Relevant policies regarding transport and development are set out in chapter 3C of the London Plan. In addition, in preparing their LDFs boroughs are asked to have regard to the implications of the phasing table (Annex 3) on the need for higher densities and the creation of sustainable communities (see also Proposed Action 2.1).
Part two, section 2: Proposed action 2E.2– Transport and accessibility, managing demand		
Point 1	Delete	Relevant policies regarding transport and development are set out in chapter 3C of the London Plan. The Mayor, TfL, boroughs and other strategic partners are asked to use the TfL Business Plan, borough Local Implementation Plans and other delivery mechanisms to support investment in transport, particularly by sustainable modes.
Point 2	Delete	In view of the existing high demand and growth expected in the sub–region, particular emphasis should be given to integrating improvements to sustainable modes with appropriate adjustments of parking standards and strategies, reflecting the London Plan approach of lower parking provision for areas where good alternatives to the car are available.
Point 3	Amend	TfL are currently exploring how best to develop measures to change travel behaviour and will work with sub-regional stakeholders and government to explore innovative options.
Part two, section 2: Proposed action 2E.3 – Transport and accessibility, freight and distribution		
Point 1	Support, amend	Working with the London Sustainable Distribution Partnership TfL, boroughs and other stakeholders are asked to promote a collaborative approach to local distribution issues and opportunities, for example through sub-regional freight quality partnerships such as the West London Freight Quality Partnership.
Part two, section 2: Proposed action 2E.4 – Transport and accessibility, analysis of capacity and accessibility		
Point 1	Support	TfL, in consultation with key stakeholders, will produce an integrated sub-regional transport network plan to ensure a co-ordinated approach to meeting the sub-regions transport needs, which appropriately reflects development planning issues, and to feed into the reviews of the London Plan and the Transport Strategy. As well as reviewing infrastructure needs, this would consider issues such as improving travel information and influencing travel behaviour.
Part two, section 3: Proposed action 3.1 – Ensuring development brings benefit to communities		
Point 1	Deletet	Boroughs are asked to develop Policy 2A.4 of the Plan through their LDFs, Community Strategies and Neighbourhood Renewal Strategies and to consider whether there are any additional potential Areas for Regeneration that they would wish to see in the review of the London Plan.
Part two, section 3: Proposed action 3A – Sustainable local economies		
Point 1	Support	In their LDFs and Community Strategies, boroughs are invited to consider the linkages between areas of deprivation and access to labour markets and work with TfL and other partners to identify a package of measures to improve the situation
Part two, section 3: Proposed actions 3B – Securing economic and social inclusion and improving health		
Point 1	Delete	The Mayor, with partners, will seek to maximise the benefits of growth to West London’s excluded communities, as identified above, and will assess impacts in annual monitoring reports.
Point 2	Support	All partners are asked to maximise the potential of the emerging Sub-Regional Economic Development Implementation Plan for West London to address the needs of groups identified above
Point 3	Amend	In association with the boroughs the Mayor will explore the need for an over-arching sub-regional community strategy to complement and guide Local Strategic Partnership plans and assess the implications for the review of the London Plan.

Point 4	Delete	The Learning and Skills Councils and the London Skills Commission are asked to review their strategies to maximise the engagement of deprived communities and disadvantaged individuals in the economy.
Point 5	Delete	Boroughs are asked to prepare BME and SME business development strategies with LDA, LSC and Business Link.
Point 6	Delete	Boroughs are asked to support the development of the voluntary sector as service deliverers, especially in the social care and health fields and to support the development of the social enterprise sector.
Point 7	Support, amend	Boroughs are asked to coordinate the targeting of government and EU resources to build community capacity
Point 8	Delete	Boroughs are asked to produce action plans to support a bottom up approach to community-led regeneration whilst encouraging local and suburban identities.
Point 9	Delete	In reviewing their strategies, boroughs should aim to maximise the potential benefits to the wider determinants of health.
Part two, section 4: Question 4A - Ensuring development improves the environment		
Point 1	Comments made	Stakeholders are asked to identify what, if any, detailed distinct sub-regional actions are required on conservation, design and public realm matters in the final SRDF.
Part two, section 4: Proposed actions 4B – Sustainable development, construction and energy		
Point 1	Delete	Boroughs and developers are asked to include the above targets when preparing LDFs and in considering applications.
Point 2	Delete, replace	Boroughs are asked to include policies to minimise the visual and noise impact of renewable energy schemes. They should also foster community involvement as much as possible when considering these schemes.
Point 3	Support	The Mayor will work with Boroughs and the LDA to define Energy Action Areas to showcase low carbon communities that demonstrate a range of energy technologies and techniques.
Part two, section 4: Proposed actions 4C – Air quality and noise		
Point 1	Delete, replace	Boroughs are invited to consider possible actions that can be included in their community strategies and LDFs to mitigate the effects of local generators of air pollution and noise.
Part two, section 4: Proposed actions 4D – Open space and the Blue Ribbon Network		
Point 1	Support	The Mayor will work with boroughs and other partners in helping to identify an area of search to meet the deficiency in access to Regional Parks as set out above.
Point 2	Delete, replace	In their LDFs boroughs are asked to set out proposals to meet deficiencies in access to Metropolitan and District Parks and to take forward the Green Arc approach.
Point 3	Delete, replace	In their LDFs boroughs should identify Areas of Deficiency in access to nature and aim to address these through planning policies.
Point 4	Delete	LDFs should seek to protect boatyard operations and implement the relevant parts of the proposals in the Hampton-Kew and Kew-Chelsea strategies.
Part two, section 5: Proposed action 5A - Densities		
Point 1	Delete	Boroughs should include detailed proposals for higher densities in their LDFs, in accordance with London Plan policies (including masterplans for larger sites), and introduce a policy to refuse developments that represent an under-use of land. See also Action 2.2.
Part two, section 5: Proposed action 5B – Housing mix		
Point 1	Comments made	The views of boroughs and other partners are invited at this stage as to what actions will best lead to the provision of the larger units that are needed in the sub-region.

Part two, section 5: Proposed actions 5C – Mixed use and changes of use		
Point 1	Delete	When assessing larger developments, boroughs should consider whether the introduction of a wider range of uses could increase the sustainability of the development and/or the centre.
Point 2	Support, reword	Boroughs and developers are asked to take account of guidance given in Section 1 on retention and change of uses from offices to other uses and seek to manage the consolidation of the outer West London suburban office market through the regeneration of existing premises and to meet the long and medium term office requirements.
Point 3	Delete	Boroughs and developers are asked to take account of the strategic principles guiding retention and change of use from industry to other uses, given in Section 1.
Part two, section 5: Proposed action 5D – Tall Buildings		
Point 1	Delete	Stakeholders are asked to comment on areas in the sub-region that are in principle suitable for the location of tall buildings.

Appendix 2 – West London Monitoring

Overview of issues raised at Borough meetings

A. Executive Summary

During the formulation of the SRDF and the WLEDS, it has become apparent that a sub-regional monitoring framework may be needed. specifically, to collect information in a timely and consistent way to;

- review how West London is growing and developing in relation to predictions made in the Mayors London Plan and subsequent SRDF
- use information to make a case and support lobbying for greater West London resources, particularly from regional and central government
- manage the actions identified in the SRDF and WLEDS
- use existing data to limit duplicating resources and putting additional monitoring demands on boroughs.

B. Summary of Borough Discussions on Monitoring

The boroughs have stated that any further sub-regional activity must use, and make better use of existing monitoring systems

C. Benefits

The boroughs all agreed that a West London monitoring approach would be useful as it would;

- enable information to be collected to support sub-regional and regional documents (ie the SRDF)
- provide information to monitor changing land use demands (ie industrial to residential)
- enable sub-regional benchmarking and greater communication
- encourage greater sharing of information between the boroughs and help develop common / joint monitoring for specific issues (ie cross boundary issues – pollution, transport etc, annual monitoring report comparisons)
- promote timely and accurate monitoring practices (ie identify changes / anomalies quicker)
- could enable a review of developments in neighbouring sub-regions

Within the West London context, monitoring would enable a comparison of how West London was performing compared with other sub-regions against the London Plan and government targets. Additionally, joint monitoring would help identify differences between the needs of London and those of the sub-region.

In borough meetings it was noted that particular concern exists regarding the need to identify the amount of land available for industrial, commercial and retail and the loss of land from those activities for housing. Specifically, the need for regular and current information to enable the sub-regional housing provision targets (in the London Plan and SRDF) can be monitored and tracked.

It was noted that this information is key to managing land use and development. Boroughs were also concerned to avoid data duplication in any monitoring system.

The Resource implications for developing and maintaining any monitoring system were a major concern, additional funding would be needed.

Sub regional monitoring focus

The boroughs also identified specific topics that should be monitored at the sub-regional level

D. Monitoring Baseline

It was noted that any sub regional monitoring needs to be compared to a baseline. The following information was identified as being suitable to establish a West London monitoring baseline;

- total housing stock, including tenure, room provision, habitable room information from census data, HCS information
- total industrial and commercial land, including floorspace in outer town locations for retail, leisure and office activities
- town centre health checks
- environmental indicators, including waste, air, land and water indicators
- Opportunity areas, monitoring the benefits from money spent in opportunity areas to see if value for money or what the changes are
- regeneration areas, monitoring the benefits from money spent in regeneration areas to see if value for money or what the changes
- deprivation indices, again review investment level and actual outcomes
- open space and green belts, extent of open space land, losses and gains as well as monitor development pressures
- population figures, monitor changes of predicted and actual figures and impacts in sub-region
- employment figures

E. Key Areas for Monitoring Activity

Ideally

- Housing (HCS provision, total build figures, amount and type of affordable housing, density)
- Loss of employment land (land release)
- Transport (walking distances to stations, track replacement / upgrade programmes, parking provisions)
- Industrial land (availability, impact from housing trajectory information)
- Retail (borough trends, impacts of development on West London within and outside sub-region)
- Open space (area, loss, public accessibility)
- Waste (recycling, needs, land availability)
- Air quality and Waste
- Best value indicators
- Financial contributions (amount collected, use, ability to combine for cross boundary services)

Existing Monitoring information that could be used to support SRDF monitoring

F. London Development Database

All boroughs are already required to submit information relating to planning permissions on the London Development Database (LDD) administered by the

GLA on regular basis (monthly – 3 monthly). The information required is consistent across all London Boroughs for the following types of applications;

- **any** loss or gain of residential units
- hotels, hostels and residential homes with 10 or more bedrooms
- new development in any other use class with a floor space greater than 1,000m²
- **any** loss or gain of open space

Borough Concerns

From a borough perspective the following concerns were noted with the LDD;

- The system only monitors information on planning permissions, the system would need to be further developed to monitor land loss and:-
- Further fields would need to be added to the LDD, in order to capture small scale development
- Develop a standardised system for collection and entering and provide training on it
- (This will deal with any potential for duplication where phased development is proposed or multiple applications for differing developments for the same site are received (including superseded proposals)
- Improvements to the existing LDD need to be made to ensure that boroughs can access submissions to eliminate duplications and check development in logged data

The LDD is already online it is easy to input the information required. The information will shortly be available as on line data sets, which will enable individual boroughs to monitor their progress more efficiently (nb Hounslow use the LDD as the basis for all monitoring).

G. Regular review of the Housing Capacity Study will also provide access to information on housing development across the sub-region

In addition to the LDD, boroughs are also required to submit information relating to the Housing Capacity Study (HCS), also administered by the GLA. Housing capacity returns are submitted by the boroughs every ([check frequency](#)). The information required is consistent across all London Boroughs for the following types of applications;

- large identified sites and conversions
- large identified office sites and conversions
- large windfall sites and conversions
- large windfall office sites and conversions
- small conversions
- small sites
- vacant dwellings
- non self contained permanent accommodation and
- live-work units

H. Additional monitoring by government agencies

In addition to the LDD and HCS, the following monitoring databases exist;

1. National Land Use Database (NLUD)
 - Monitors large sites, particularly brownfield sites.
 - Concerns raised by boroughs over the duplication of the LDG information and inclusion of 'potential' windfall sites.

- This database was not considered to be a reliable data source by some boroughs.
- 2. Housing Investment Program (HIP)
 - monitors the housing tenure structure. Database administered by the OPDM. *(nb more information required on what this system includes)*
- 3. Best Value Indicators (BVI)
 - Monitor buildings within brownfield and greenfield sites.
 - Database administered by the OPDM.
 - This database was not considered to be a reliable data source by some boroughs as primarily the applicant completes the information.
 - Some applicants 'fudge' the information to try and reduce the amount of financial contributions / affordable housing required to provide.

I. Annual Plan Monitoring

The Boroughs are required to submit annual monitoring plans (AMR) as part of the LDS process to GOL. The purpose of the annual monitoring plans is to review how well local plans are achieving the desired and stated outcomes in LDFs and regional and national policy documents. Ealing has already completed a draft AMR and are expected to have a completed version by the end of July. All other boroughs are currently working to produce a draft later in the year.

The boroughs have formed a network group to promote discussions on shared learning and intend to meet regularly. There is support to investigate the potential for boroughs to work together to produce similar AMR information (information that is more comparable across the sub region).

J. Suggestion

That the AMRs include a monitoring section or series of questions to specifically monitor priority key issues identified above (i.e loss of employment land, housing etc). This would enable a consistent monitoring approach to be further developed (a key concern shared by all boroughs) and provide regular updated monitoring information.

Appendix 3 – West London Partnership consultation overview

The West London Alliance, on behalf of the West London Partnership, has been actively engaging its partners and stakeholders throughout the development of the West London SRDF. Two wider stakeholder forums were held in October 2004 and February 2005 to raise awareness of key issues in order to provide constructive feedback to the GLA and ensure the SRDF reflects West London's priorities.

The following groups have been kept informed of the development and consultation on the West London Sub-Regional Development Framework and comments have been sought to further inform the West London Partnership's response. The Partnership has attempted to include comments of a sub-regional nature from these groups. Site specific or local issues of concern to these groups will be detailed in their own submissions (should they make any).

- a) West London Alliance
 - Planning Reference Group
 - Housing Directors and Affordable Housing sub-group
 - Transport Group
 - Air Quality Group
 - Culture
 - Tourism
- b) West London Business
 - Land and Property sub-group
- c) West London Learning and Skills Council
- d) North West London Strategic Health Authority
- e) West London Network
- f) West London individual borough meetings
 - Harrow
 - Hammersmith and Fulham
 - Hounslow
 - Brent
 - Ealing
 - Hillingdon
- g) Park Royal Partnership