

LONDON PLAN FURTHER ALTERATIONS: PUBLIC CONSULTATION**ISSUES PAPER FOR WEST LONDON ALLIANCE**

This paper represents a distillation of the key issues for West London from the 500 page Further Alterations document. It presents them in the form of key questions (upon which WL will need to determine its view) and key issues for debate, in order to inform WLA's eventual response to the Mayor.

This paper is to be discussed by the Planning Reference Group on Friday 20th October and then subject of limited consultation and refinement, prior to a Stakeholder Consultation event on Thursday 16th November, when discussion will be focussed on the emerging key issues for West London.

As it stands this Issues Paper is an emerging document and will be subject to further change. It is currently informed by our understanding of the main issues for West London, based on the documents provided and discussions with key officers.

OVERVIEW

Presenting a final Overview of the Further Alterations and their implications for West London (WL) will depend on the response to the ten key structuring issues, raised within the Further Alterations, and listed below. The responses on these points will dictate the nature of the WL response.

Ten key issues requiring clarification

1. Are the Areas for Intensification (P33), which do not include any locations in West London (Willesden having been converted to an OA) accepted by WL?
2. Are the Opportunity Areas (listed at P33 and P341) accepted by WL?
3. Are the Areas for Regeneration (P35, P343 and map 2A.2) accepted by WL?
4. Is the Town Centre network (map 3D.1 and Map 5F.1) acceptable to WL?
5. Are the Strategic Industrial Locations (Map 5F.1) acceptable to WL?
6. Are the Household projections (paras 3.7 and 3.8) agreed by WL?
7. Is the tougher requirement for planning frameworks for new housing developments (reduced from sites of 10 hectares to sites of 5 hectares, or sites capable of accommodating 200, formerly 500 dwellings, set out at Policy 3A.5 page 59) acceptable to WL and its constituent Boroughs?
8. Is the new threshold for affordable housing - sites with a capacity to provide 10 or more homes - (P67 para 3.44ii and Policy 3A.8i) - acceptable to WL and its constituent Boroughs?
9. Is the location of Wembley as a "regional casino" (P169, policy 3D.4i) - supported by WL?

10. Is the proposed extension of the White City OA towards Wormwood Scrubs acceptable to WL? (para 5.166 page 343)

STRATEGIC ISSUES FOR DEBATE

The following statements indicate some general comments on the document as a whole and the emphasis given to certain areas of policy, perhaps at the expense of others. We would appreciate a steer from WL at an early stage as to whether our views are shared and whether these thoughts should influence the way the eventual response to the Further Alterations is phrased and set out.

- We are concerned that the document overall is not consistent. For example, there is a welcome focus on sustainability, the suburbs, climate change etc, but the drive remains to improve radial movement to CAZ as a priority against other objectives. Information about public transport investment in WL is limited and vague, and the majority of schemes mentioned are, once again, radial in nature. There is still talk of reducing growth but not car movements in the outer areas which calls into question the sustainability of the Plan.
- No real public transport network is defined even at a strategic level although walking and bridges are. The focus is on corridors and schemes not networks. There is a need for a strategic public transport network in the Plan which can be further developed in the SRDFs and can be used alongside the travel plan polices to provide key parts of the proposed transport network plan.
- When WL has checked out whether the new growth figures for housing and employment are acceptable, together with the geographical distribution, there needs to be agreement that these can be catered for by the transport system as proposed, particularly public transport - at present we have doubts as to whether they can. If one looks at Canary Wharf, for example, a substantial modal shift to public transport has been achieved in relation to housing and commercial development, which new development schemes elsewhere ought to seek to replicate. Rather than assume over the 20 years of the Plan that the outer areas are going to continue to be car based every effort should be made to ensure that this is not the case - the implications of the current approach conflicts with the "exemplar" status sought for London.
- There are real issues and concerns regarding the approach to SIL. There is a focus on waste and logistics, and yet these locations are very much road based and the impact on the environment has not been thought through. Yet in the opportunity areas or run down areas such as Willesden, it is not clear what will happen regarding their current rail freight functions, given the emphasis in the freight policies this provision will move outside London. The idea seems good in principle but needs to be clear on the implications for employment and the locations.
- Is the affordable housing threshold (p 68) politically acceptable and deliverable?

- The tourism industry section is silent on Heathrow (p112 onwards), and there is a need for positive policies linked with transport, especially in view of London 2012 Olympics.
- There is at best a blurred message (p165 etc) regarding strategic retail / leisure at Wembley, White City, Brent Cross - their linkages to public transport existing and proposed - and scope for further expansion.

SPECIFIC COMMENTS

The specific comments which follow are related to the chapters of the document and to particular policies or paragraphs. They generally relate to changes which have been made to the Plan, but occasionally to changes which have not been made although there has been an opportunity to do so, or to matters which have been completely omitted from consideration but, we feel, should be debated.

Chapter 2: The Broad Development Strategy

In the major overarching spatial development strategic policy, P27/28 policy 2A.1i, we have concern that the sub-regional structure should integrate outer, inner and central London and more strongly reflect the key roles of radial linkages. The policy as it stands reflects the status quo and does not take the opportunity to have a fresh look at the structures and inter-actions of London.

In the same overarching policy we think that the lack of reference to Heathrow as the major international gateway to London is disturbing and should be remedied. This theme is continued at P28 policy 2A.3, where Stratford is celebrated as a developing European Gateway but there is no mention of the role of Heathrow as a world gateway.

We develop the points below that not all the identified Opportunity Areas, nor Town Centres (P28 policy 2A.3 and Policy 2A.5) are well served by public transport, at least not from all directions.

Generally, the overarching spatial policies do not signal significant improvements in access to outer London and we recommend that WL in its response should make it clear that such improvements are expected. The policies are disappointing with regard to sustainability and climate change, especially when looked at in the context of town centres and orbital movements, which are issues of great relevance to WL.

The new and important policies for London's sub regions (P30 policy 2.5i) again focus on the radial nature of London's spatial structure without addressing the need for strengthened orbital links.

At P37, policy 2A.5, the revised policy on town centres starts to develop a concept of a polycentric approach, but this is not followed through in other policies or actions, especially regarding transport.

There is a new section on suburbs at P39/40. This is good in principle but the first bullet on P40 could cause problems regarding job opportunities, as could the 3rd and 4th bullets, given the lack of effective public transport to town centres, and between them, in outer W London. This presents an opportunity for WL to define its own policy for the suburbs and to ensure, via its response, that this is integrated into the London Plan.

At P41 - para 2.17, we consider that there should be more information regarding the proposals to invest in public transport in relation to crime, as this could be a key means of influencing increased public transport use.

There is some confusion at P42 - para 2.20i - which says that 70% of jobs are currently located outside CAZ and that the projection is that two thirds of job growth will be outside CAZ in future. As the public transport network is stated not to be adequate, where will these jobs be located? We consider this is a key issue for WL given existing levels of congestion.

At P43 - para 2.20iii there is a key new policy for enhancing job prospects for suburban Londoners, but we consider that the proposed strategic transport investments do not appear to adequately support the proposals to enhance these job prospects, which stands as a major failing in the Plan.

At P45 - para 2.23v - there is mention of "continued improvements to bus services" but no accompanying detail or strategy. We believe that WL should ask for this detail so that improvements can be measured? Further at P47 there is reference to an extensive bus network - WL should point out that this is not so in the suburbs and not at the necessary levels of frequency

Chapter 3A: Living in London

Chapter 3A concentrates on housing and addresses issues of diversity.

A key issue relates to the extent whereby the London Plan will control the density of new housing provision within London, and the Plan sets up a density matrix in Table 3A.2. A significant alteration to the Plan is that instead of the Mayor *expecting* planning applications referred to him to be *in conformity with* the density matrix, he will now expect them to *reflect the* matrix, leaving some scope for the Borough. We expect WL to welcome this change (P56 - 3.15i).

Density ranges are related, in the matrix, to definitions of Central, Urban and Suburban locations. The definition of Urban appears to be lacking, in that such locations are indicated to be within 10 minutes walking distance of a district centre or along major arterial routes. We would suggest that WL would wish to argue that a similar walking distance from a public transport node, e.g. underground or bus station, could be added (P56 - 3.15V).

A key paragraph (P57 - 3.15vi) suggests that sites with a *good public transport connectivity* can be developed to high densities, while those where connectivity is limited should be at the lower density range. This implies a status quo and ignores sites which would be suitable for high density development but where there is scope for improving transport. We believe that WL should point out that this is a wasted opportunity.

In keeping with the enhanced reference to biodiversity, the document states that new housing *should avoid having an adverse impact on European biodiversity sites*. We recommend that WL should ask for more specific guidance as to what is required in order to do this (P60 - para 3.24).

The definitions of affordable housing are updated in the document especially with regard to income criteria, and we believe that WL will welcome the Mayor's indication that these criteria will be updated annually. We think, however, that WL should press for this re-assessment to be carried out in conjunction with Boroughs and other stakeholders (P62 - para 3.27).

Sections of the Plan on diversity are expanded, and P73 - policy 3A.14 makes clear the link between diverse populations and the provision of suitable space for SMEs. We believe that WL will actively welcome this and should seek to engage with the Mayor in creating suitable policies to enhance opportunities for such provision to be made.

Communities will generally welcome the declaration (P86 - para 3.89) that full use of schools during weekends and evenings will be sought, but we consider that in recognition of locations where housing and schools are in close proximity, WL should ask for extra words to be inserted to recognise the need to have regard to the potential for noise, parking and transportation implications.

Chapter 3B: Working in London

This chapter looks at opportunities for economic growth alongside predictions of how London's economy will change up to 2020.

The document states (P99 - para 3.114) that in 2005, London had 28.5 million square metres of offices, of which only one quarter was to be found outside CAZ and the Isle of Dogs; and that Heathrow (Hillingdon and Hounslow) dominate the suburban London market. We consider this paragraph to be begrudging of Heathrow's contribution and special role as the major transportation gateway to the world city of London. The role of Heathrow as an office location is not in any way "suburban".

At P107, para 3.129ii, there is expressed a *particular need* to secure strategic logistics provision near Heathrow. We believe that WL would wish to see further elaboration of this statement, particularly with regard to location and transportation implications.

A new paragraph (P108 - para 3.131) indicates that synergies between science parks and universities will be explored. This could be an issue of major economic significance for WL and we recommend that it is supported by active involvement in the exploration process.

A short paragraph about teleworking (P110 - para 3.134) has not been updated in the Alterations, and we believe that the opportunities for teleworking could be of great significance to WL in terms of housing location and transport forecasting. We suggest that WL should press for active research on this rather than simply "monitoring".

Additional paragraphs rightly look at the implications of 2012 Olympic and Paralympic Games for transport, tourism and employment. Connections should also be made with the future development of Heathrow as the international gateway to London. In this context (P113 - para 3.144)

Chapter 3C: Connecting London

This chapter concentrates on the Mayor's objective of making London more accessible, taking an integrated approach to transport provision and development.

P128 - para 3.166 indicates that Opportunity Areas and Areas for Intensification, *particularly in East London* should be supported by improved public transport. We believe that public transport improvements should be a key policy factor for all OAs and AOIs, including those in WL.

P129 - para 3.169 talks about the need to improve capacity for access by public transport to international airports and stations, including Heathrow. We believe that WL should point out that travellers still need often to come into London and go out again to Heathrow, and that Heathrow should be considered as a transport hub/node in its own right like mainline stations.

A stance on airports policy is declared at page 131 - policy 3C.6, which refers to adequate airport capacity being provided to *sustain London's competitive position*. Whilst this is understandable in pure economic terms, this stance is not compatible with climate change and the sustainability agenda, as it is effectively fuelling growth in the air industry. We suggest that WL should determine how it wants to deal with this dichotomy.

A revised Policy 3C.6 (page 133) declares that strategic inter-regional rail services will be improved. This is to be welcomed, but there is no mention of Heathrow in this policy, nor the North of London proposed Line, the London orbital rail route, and even (for the Olympics) the link to Weymouth from Heathrow. We believe that WL would wish to draw attention to these omissions.

A revised policy 3C.9 (page 134) seeks to increase the capacity of public transport by up to 50% over the plan period. We recommend that WL should seek clarity as to whether this 50% increase in capacity of public transport relates to all London or just to CAZ; our view is that it would probably not stack up in outer London given the nature of the current proposals, which are in any event mainly radial in nature.

A new paragraph 3.182i - page 135, highlights the opportunities for improved transport improvements in East London associated with London 2012 Olympics and Paralympics. We believe that WL should inquire as to whether this reflects the full distribution of Olympic facilities across London including Wembley and beyond - e.g. Weymouth?

Para 5.165, page 342 also refers to leisure growth at Wembley, which should also be associated with positive transport enhancements.

A list of rail schemes which are to be enhanced is given at P136 - para 3.183i. We consider that WL should check that all relevant schemes are listed at this point, and in policy 3C.11 on page 137.

There is a general lack of new policy in the document notwithstanding a 20 year programme for improved transport services, and it is regrettable that the Mayor still has not resolved to sort out orbital movements in inner and outer London, such as the possible use of part of the North Circular for a fast bus link/lane, with a new orbital fast route further out.

A list of improvement schemes for the Underground and DLR network is provided at P140, paragraph 3.191. It is not clear whether this is a full list or whether the specified schemes are prioritised. We suggest that WL should seek clarification of this and check for completeness. Additionally, some of the improvements, such as those for the District and Circle Lines, are not timetabled.

There is reference on P142 and elsewhere to tram schemes, and the West London Tram is specifically referred to on P339. We consider that WL should decide what its stance is on these proposals and, if supportive, should press in its response for them to be expressed as policy in this section of the document.

The Mayor's vision for tackling traffic congestion in London involves a 15% reduction in weekday traffic in Central London, and zero growth elsewhere. These targets are not consistent with London being an exemplar city etc. - elsewhere in the world cities are proposing and achieving greater reductions. We believe that WL should point out that it is taking 20 years too long in the context of climate change, given the scientific predictions.

The possibility of road user pricing is explored at P145, and the Mayor states that he will co-operate with government on the potential for this. We suggest that WL

indicate that the boroughs also need to be engaged and their cooperation sought on this potentially controversial issue.

In terms of improvements to the bus network, we believe that WL should argue for a strategic bus network map, linked to strategic centres, OAs, so that gaps in the bus and public transport network can be easily identified. Ideally this would include a map that shows trains, tubes, strategic buses etc. in outer London.

A strategy for freight distribution is developed at P155 - para 3.215. We recommend that WL should indicate that the policy needs to refer specifically to the implications for Willesden and the surrounding road network as this freight tends to be roads based.

A short new paragraph -P156 - para 3.217i discusses air freight, but there is no mention of Heathrow although it is a national freight centre and should be linked into the rail network. WL should seek to incorporate this in the policy and seek a decision on where multi-modal freight facilities are to be located to serve West London. Para 5.164 also discusses this concept in the context of Park Royal.

Chapter 3D: Enjoying London

This chapter looks at culture, shopping, sport, tourism and open space.

There is a somewhat vague new paragraph (p164/5 - para 3.230i) - about strategic retail and leisure proposals at locations including White City, Wembley and Brent Cross which talks about integration with other centres and the need to ensure quality and competitiveness. We believe that WL should seek clarity about what is being said in this paragraph so that objectives can be expressed as clear planning policies.

Policy for visitors' accommodation and facilities are altered at P172 - Policy 3D.6 but no guidance nor strategy for visitor accommodation at Heathrow is incorporated - we believe that WL should ask for this omission to be remedied.

Chapter 4A: Climate Change and London's Metabolism

Chapter 4A contains a welcome strategic focus on the implications of climate change for London, and sets out a number of carefully thought out policies which will work towards mitigating and adapting to this change, emphasising implications for the environment and public health. We believe that WL will wish generally to welcome this largely new chapter.

However, a group of statements at P209 - para 4.30iii onwards present information about the potential risk of flooding, and we believe that WL might well seek for these statements and associated policies to be strengthened in view of the serious implications for the potential of flooding in WL.

A section of the chapter on the improvement of air quality (P216 - policy 4A.6 and onwards) does not, in our view, give sufficient emphasis to the need to resolve problems of poor air quality close to motorways and airports in particular, which is a major issue for WL.

Likewise, the section on *Reducing noise* (P218 - policy 4A.14) is silent on the need to reduce noise for residents in the vicinity of airports and flight lanes, an issue for WL.

Chapter 5: Sub-Regions

Chapter 5 defines the role of the sub-regions (reflecting changed boundaries) and states that these provide the best means of developing the strategic policies in the London Plan and providing a focus for their implementation. The West London sub-region now comprises seven, rather than six Boroughs, with the addition of Kensington and Chelsea.

Each sub-region is stated to contain three kinds of area, these being a part of the CAZ, an "inner band", and the outer part "characterised by lower densities". The inter-connections between the different parts of each sub-region are stated to be strong, as supported by "good radial transport", and the document goes on to say that *the core strategy should be to improve access to jobs both locally and in the CAZ*. On the surface this may seem like a sound strategy, but we believe that WL will wish to see reliance on radial inter-connections introduced with greater recognition, and development of orbital transport patterns and opportunities. (P290, para 5.13).

The first strategic priority for West London is seen in the document as being to *strengthen economic linkages throughout the region to the CAZ*, but the same paragraph confusingly refers to *the corridor of economic activity stretching from CAZ to Heathrow*, setting up a further corridor of radial movement without recognising the major attraction of Heathrow as a communication focus in its own right. We believe that this is a further example of the under-playing of the role of Heathrow in this document (P337, policy 5F.1).

A further strategic priority is seen as improving air quality around Heathrow, which we believe WL should endorse. However air quality is also poor in the vicinity of West London's motorways, and we think that WL will want to emphasise this, also, in the interests of the sub-region's residents (P337, policy 5F.1).

Some of the aspirations set out as strategic policy are vague. There is reference to *potentially surplus industrial land*, but this is neither quantified nor located. *Improved bus services* will be planned for and financed, but to what extent and with what strategy in mind? We think that WL should ask for clarity and a strategic lead on these points (P337, policy 5F.1).

We note that the role of Wembley as an Opportunity Area is specifically picked out, with a link to town centre regeneration and new housing. We believe that WL will want to consider the level of the Plan's commitment to these objectives (P337, policy 5F.1).

In its overview of the sub-region and description of its potential, the document states that WL *could accommodate over 40,000 additional homes by 2016* and that it is *projected to provide about 140,000 extra jobs by 2026*. WL will need to check that these figures are robust, otherwise there could be unwanted consequences for the sub-region by way of over-crowding, insufficient social and physical infrastructure or increased transport movements (P338 - para 5.154).

The document goes on to say that much of the planned growth should be realised through higher density development, which will exploit locations with good existing public transport, or potential access by public transport. WL may wish to respond on the implication that areas currently with poor public transport are likely to be left behind, with a consequent negative impact on local economies, and may wish to question the strength and evidence of the desire to improve public transport within the sub-region (P338 - para 5.155).

The section on transport indicates that existing capacity and planned additional investment should enable WL to accommodate the forecast level of growth. The examples of new schemes are "subject to funding" or fairly vague, and we believe that WL may wish to question whether enough investment is actually signalled in the Plan to service the high level of forecast economic growth (P339 - para 5.159). Only one of the listed new transportation schemes, the North London Railway, could be considered as orbital, this emphasising existing patterns.

Table 5F.1 (page 341) defines the four Opportunity Areas in WL - these being Heathrow, Park Royal / Willesden Junction, Wembley and White City, with indicative employment capacity and minimum numbers of new homes suggested for each. Footnotes to the table make it clear that these targets will not be achieved without improvements to the transport infrastructure which will have to be financed from developers' contributions. WL will want to satisfy itself that the relationships and potential for achievement are practicable.

The development of the Heathrow area, we believe, should be seen alongside Heathrow's key role as the major international gateway to the world city of London, and we believe the influence of Heathrow is understated in this part of the document. Certainly more should be made here of the issue of "permeability" recognising the role of Heathrow as a transport focus and economic hum for an area far wider than WL (P341 - para 5.161).

Wembley's potential to house a *regional casino* is mentioned, and we believe that WL needs to satisfy itself that the many conflicting needs of such a major new activity can be satisfactorily met (P342 - para 5.165).

In the context of White City, the document refers to the need to explore an extension of the development capacity towards and including Wormwood Scrubs. This would appear to involve major revisions to existing planning designations, to which WL will want carefully to consider whether or not to signal its acceptance at this stage (P342 - para 5.166).

Chapter 6: Implementing the London Plan

This final chapter sets out how the Mayor intends to achieve his vision for London, recognising that this cannot be done alone but requires the active support of stakeholders and partners.

P366 - para 6.32 indicates the importance of maintaining a regular and sufficient supply of land for new development, and predicts that the biggest demand for land will come from housing, waste facilities and schools. WL will need to consider this carefully and take a view as to whether transportation and employment should not also be included in this mix.

A major new paragraph (P368 - para 6.35i) discusses TfL's £10 billion investment programme to 2009/10. It is clear that there will be significant investment in maintenance and enhancement of public transport, but we think that WL might wish to express surprise that positive statements about the need to encourage a modal shift from car dependence, and the means to support this, are not made.

Joint working with EEDA and SEEDA is confirmed at P375 - para 6.50i, and this is welcomed, but we consider that WL should press for recognition that joint working is additionally required on a strategic approach to air traffic growth, noise etc.