

Planning for a Better London Response of the West London Alliance

Introduction

- 1.** The West London Alliance is a well established partnership of the Boroughs of Brent, Ealing, Hammersmith and Fulham, Harrow, Hillingdon and Hounslow. We have a strong and well developed track record of joint working on planning, economic development and transportation matters. With West London Business the WLA is a founder member of the West London Partnership which now includes the West London Network (third sector) the LSC and the Strategic Health Authority. This provides the basis for the strong record of sub-regional partnership working across all sectors in West London.
- 2.** We also have a close collaborative relationship with adjoining boroughs on key issues.
- 3.** With a population of 1.43 million (2007 mid year estimate), 700,000 jobs and an economy of £32.4bn GVA, West London ranks with many of Europe's major cities in its own right while contributing significantly to the success of the capital city. The WLA and its partner organisations are committed to maintaining and improving West London while recognising its relationship with London as a whole
- 4.** The WLA welcomes 'Planning for a Better London' and the opportunity to respond. We very much support the Mayor's intention to involve the Boroughs, particularly the outer Boroughs, in developing his planning strategies. The WLA has devoted significant resources to sub-regional and pan-London planning issues in the past but has often been disappointed with the response from the mayor. The change in approach to a more consensual partnership is therefore very welcome.

Summary

- 5.** Like the Mayor, the WLA sees much to commend in the existing London Plan and its revisions, and would be concerned if its policies are rejected too quickly without robust, evidence based analysis. In the immediate future therefore we would like to see priority given to developing the consensual approach the Mayor seeks, working closely with the Boroughs to achieve agreed outcomes. The increased emphasis on Outer London and its contribution to the future of London as a whole is particularly welcome. The relationship with the adjoining sub-regions is also of great relevance for the suburban Boroughs.
- 6.** This response follows the structure of the Mayor's document with comments on the questions posed at the end of each section.

The Mayor's approach

7. The WLA welcomes the directions set out in the Mayors Approach and in particular

- Building consensual relationships with the Boroughs and strategic partners across the whole GLA family. The Sub-regional partnership and the Boroughs would welcome a relationship based more on an equal partnership with the LDA and TfL than has been the case in the past.
- An emphasis on outcomes rather than process and targets, based on improved working relationships.
- A greater emphasis on Outer London issues, recognising the critical importance of Outer London to the success of the capital as a whole.
- The recognition that London's relationship with adjoining regions requires a holistic approach to its planning and development.
- Recognition and support for much of the policy direction of the current London Plan.
- Support for development which is appropriate to its context and which improves environmental quality.
- An understanding that the Mayor's role is a combination of strategic leadership and support for partners and stakeholders to achieve delivery
- A focus on the strategic leaving local matters to be dealt with locally, using Mayoral powers of intervention only sparingly.
- Support for an annual London Planning Convention

8. Areas of concern to the WLA are:

9. The need for clarity about the role of Supplementary Planning Guidance (SPG) which should not be seen as a shortcut to revise London Plan policy. Apart from the procedural concerns this could cause difficulties for Boroughs in developing their LDFs where there is inconsistency in GLA policy and guidance. We are also concerned about the capacity at the GLA to produce the amount of SPG and other guidance. In our experience the level of resources available within the GLA has not been sufficient to meet aspirations and intentions in the past. Policy is important but the GLA must be capable of implementing it. Establishing priorities, with partners, will be necessary to agree a manageable programme.

10. The WLA sub-regional partnership has proved an effective mechanism for working across a whole range of issues and would be concerned about another review of sub-regional boundaries following so quickly from the last changes. Our view is that the Boroughs should have a key role in determining the boundaries for the sub-regions and that existing partnership arrangements that are working well, as in west London, should be respected. We recognise the need for permeable boundaries in any sub-regional arrangements and have demonstrated that this can work. In this context we welcome the TfL approach to sub-regional working as recently set out in letters from the TfL Commissioner to Boroughs and Transport Partnerships.

11. We welcome the decision to suspend work on SRIFs pending a much clearer (and mutually agreed) model of sub-regional relationships. The WLA devoted considerable resources to the consultation on the Sub-regional Development Frameworks but ultimately saw little added value from this involvement. There is clearly a place for sub-regional collaboration in policy and implementation and the WLA has existing arrangements for planning, housing, transportation and economic development. We would be anxious to explore how these could be built on with GLA rather than a wholesale review.

12. There is no mention in the document of Opportunity Areas. The relationship between the Boroughs, the partnerships and the GLA on this topic has been difficult in some instances. As an important policy plank of the current London Plan in respect of key employment and growth areas we would want early clarification of the Mayor's intentions towards OAs.

Response to Key Questions

13. *Is the Approach to planning set out in this chapter the right one?* The WLA generally supports the approach outlined. We particularly welcome moves to greater partnership between the GLA and the Boroughs and consensual policy and decision making.

14. *Does it strike the right balance between local and strategic issues?* The WLA and its constituent authorities have had concerns in the past at the level of involvement of the GLA in detailed rather than strategic issues. This has led not only to a duplication of effort and resources but also difficulties for applicants/developers receiving mixed messages. A clearer understanding of the respective roles, based on greater clarity on what is strategic and what is local, would be beneficial to all those involved in the London planning process.

15. *Are there things you think the Mayor and the GLA could do to improve planning in London which are not identified here?* A consensual partnership approach to policy and decision making is the first priority. The GLA needs to ensure that they have sufficient resources to meet the Mayor's ambitions (and partners' expectations) for spatial planning.

16. *Do you support the idea of an annual London Planning Convention? Would you attend if it were to be organised?* Yes. This would provide an excellent opportunity to debate pan-London issues and help establish key priorities in a transparent way.

The Key Challenges

17. The WLA recognises the challenges that face London in terms of the growth and changing composition of its population. In the past we have found it difficult to gain recognition of the particular challenges this brings to West London, both as a very substantial sub-regional economy and in the potential

impacts on infrastructure needs and environmental quality. Without the necessary infrastructure to support population and employment growth there is a real danger that both the residential and economic advantages of West London, and therefore its contribution to London as a whole, will be undermined. There are continuing concerns that the focus on the regeneration needs of East London, which are not in dispute, can be to the exclusion of proper consideration of the investment needs in the West.

18. Transport is a particular issue. Crossrail can only ever be a partial answer and will need local radial and more particularly orbital transport links to maximise its impact. These will be essential to deliver the WLA vision of a sub-region contributing significantly to the strengths of London as a whole and also working cohesively through an integrated network of town centres and communities. We hope that the increased emphasis on Outer London will start to address these challenges. The West London 10 Point Transport Plan, produced by the West London Partnership in Feb 2008, sets out what we see as the priorities for the sub-region. We need a soundly based long term programme for strategic transport investment in outer West London to address both the current needs and help shape the pattern of future development. Current processes fail to take account of the cumulative impact of desirable local development on the strategic transport network, and risk failing to capture adequately the development contributions to address these strategic investment needs.

19. Affordable public transport is also essential to the equitable functioning of London, recognising the needs of all Londoners. The detrimental effects of living in poor conditions can in part be mitigated by easy access to employment, fresh food, social and educational opportunities, but some deprived communities are further disadvantaged by relative inaccessibility. Improved transport connectivity to transport hubs, particularly on poorly served orbital routes, would help address this issue.

20. WLA supports the Mayor's commitment to address environmental quality and climate change. West London suffers disproportionately from poor air quality mainly as a result of Heathrow and its transport links, and such sub-regional disparities can only be addressed strategically. The need to both adapt to and mitigate climate change is well recognised and increasingly targeted through local as well as strategic planning, but there are limitations to what the planning system on its own can deliver while meeting other policy challenges.

21. The WLA welcomes the Mayor's commitment to the Green belt, Metropolitan Open Land and open space. These are essential to London's environmental quality and the wellbeing of London's communities. The Mayor's commitment to managing growth whilst protecting and improving the environment brings its own challenges. Recognition of the implications including increasing density of development and supporting tall buildings in appropriate locations is noted.

22. West London's diversity is long established and well recognised within the area. The west London Boroughs are among the authorities with the highest levels of BAME population in the country, and have a successful record of community cohesion. The contribution of the BAME population to the economy is very significant and has a clear correlation with the number of small and medium sized businesses in the sub-region. The WLA would welcome greater recognition of this contribution to the London economy, both now and in the future, and greater support for small business.

23. Housing and in particular affordable housing remains one of the greatest challenges for West London as well as for London as a whole. This is not only a social problem but a threat to the economy. Government and GLA targets, specified in terms of numbers of units, have obscured the complexity of the housing needs of the region. Whilst those in the greatest housing need must have the highest priority, providing housing at an affordable level for growing families and those performing vital services is essential to the social and economic wellbeing of the sub-region and the capital. At the same time design and build quality, space standards, energy efficiency and access to amenity space and local services of all kinds need a more sophisticated approach. Access to good quality housing with the right social and community infrastructure is fundamental to addressing health inequalities and worklessness.

24. The WLA recognises the challenges of east London and the Thames Gateway and the priority for investment in these areas. However, there is a danger that the needs of the other sub-regions can be overlooked. Increases in population on the scale projected in the west of the capital bring with it the danger of environmental degradation and economic decline if not accompanied with the necessary level of physical and social infrastructure. Relying on already overloaded public transport will not be sufficient and the seemingly inevitable increase in levels of congestion will prejudice future business investment as well as environmental standards. The WLA will be looking for greater recognition of its infrastructure needs in GLA family policy and investment plans.

25. This links directly with the Mayor's increased emphasis on looking to Outer London to realise its potential. The concentration on central London in previous iterations of the London Plan has been of continuing concern and comment. The more balanced approach now suggested is to be welcomed but cannot be achieved without investment. The recent study 'Over the Edge' highlighted the potential role of suburban town centres as employment locations and the threat from centres outside the London boundary. This is a critical issue if the Mayor's aspirations for outer London are to be realised. Growth at the strategic locations in West London, particularly the suburban town centres, will be heavily dependant on public transport investment. The change in emphasis signalled by the Mayor needs to be followed by a more proactive approach to the strategic transport requirements of such growth.

26. The WLA and its constituent Boroughs support the Mayor's intention to review long term options for London's airports . Heathrow is a major driver of

the west London economy and this contribution is essential for its future wellbeing. We would want to continue to enhance its employment and wealth creating potential and to minimise its environmental impacts. However the environmental impact of a 3rd runway on the communities in the surrounding Boroughs would be unacceptable. We would therefore wish to see the Mayor's review include the options for a high speed rail link to Heathrow, as well as priority for shorter term rail improvements such as Airtrack and Great Western extension to relieve pressure on existing services.

Key Questions

27. Have we correctly identified the key challenges that planning in London has to address? The WLA would like to see greater recognition of the contributions and challenges of the other sub-regions as well as the East and the need to ensure they can accommodate further increase in population and employment in a managed programme linked to infrastructure investment.

28. Are there other challenges that need to be addressed?

- *The WLA would like to see the Mayor reaffirm an integrated strategic policy approach to tackle deprivation, disadvantage and worklessness*
- *West London's attractiveness to business and for residents will be dependant on infrastructure needs keeping pace with growth. This is perhaps the key issue for west London and recognition of the potential problem and the need to address it is vital.*

Key Policy Responses

29. Ensuring London's continued economic success: WLA agrees with the Mayor's view that economic success is essential to the future prosperity of London and Londoners. We recognise that central London is fundamental to this success. We also welcome and support the intention to broaden the approach to look at the London economy as a whole and the potential contribution of outer London; the recognition that this will need GLA planning, TfL and the LDA to deliver a coordinated and integrated response in conjunction with the Boroughs is an essential first step.

30. The WLA agrees with:

- A supportive policy and implementation framework for key areas of the London economy
- Support for the success of all London's enterprises, whether multi-nationals or small and medium- sized enterprises. The availability of suitable premises particularly start-up and move on space for small business, is a key issue for West London

- Support for tall buildings in appropriate locations. There will be some locations where this is a matter of strategic London-wide significance. In other locations this will be better addressed through LDFs.
- Examine ways of ensuring that outer London can play a full part in the city's economic success: This is particularly welcome.
- Establishing an Outer London Commission: The WLA supports this and would want to take an active role- we would like to be consulted on the terms of reference and membership.
- Measures to ensure a diverse dynamic retail sector
- Initiatives to make the most of London's rich network of town centres
- Provision for small shops in major retail schemes, although the mechanisms for achieving this will need detailed consideration.

31. Delivering Homes for Londoners: The WLA welcomes the forthcoming consultation on the draft housing strategy which will need to address initiatives for housing delivery in current market conditions. Developing a robust set of planning policies based on an agreed evidence base and cooperation with the Boroughs will provide a platform for delivery of the housing needs of all Londoners, without the strait jacket of prescriptive targets. Social rented housing will by necessity still have a major role to play but a variety of models of tenure are required to meet the wide-ranging needs of London's population. The quality of affordable housing remains a concern and the issues raised in 'Building a better London' need to be addressed.

32. Allowing all Londoners to enjoy their city in safety: Crime and the fear of crime are high on the agenda in West London. This is a cross cutting issue which needs to be addressed on a holistic basis and the contribution that planning and design can make must be seen in this context. Many Boroughs have well developed guidance and processes for designing out crime and any policy development at a pan-London level should reflect existing achievements at a Borough level.

33. Meeting the environmental challenge: The WLA welcomes the Mayor's continuing commitment to tackling the challenges of climate change. The GLA has established a strong track record in this area, although a more consensual and flexible approach would have been welcomed on occasions. The GLA's expertise on these matters provides a valuable resource for developing solutions in cooperation with the Boroughs and the private sector. We welcome the Mayor's comment that he will not be overly prescriptive about technological solutions.

34. The Mayor will be aware of the differences of view of his predecessor and both the West London Waste Authority and the Western Riverside waste Authority on the question of incineration and we would hope further confrontational positions can be avoided.

35. Support for protection of open spaces of all descriptions against inappropriate development is welcomed. There will be occasions when the provision of social and community infrastructure (including leisure facilities) to support current and future needs of a growing population could involve incursion into open space as a last resort. This does not undermine the clear need for a firm policy stance but will need some flexibility where options are limited.

36. The balance between heritage and local character and new development is always contentious and arouses strong feelings. The WLA supports the view that local context and character should be a consideration and that the Mayor should be developing policy for major, strategic views. We would otherwise expect these issues to be dealt with locally within the context of emerging LDFs.

37. Keeping London Moving: The WLA is disappointed that there is little in this section of the document to offer any comfort that the transport needs of West London in particular and the outer Boroughs in general will be a higher priority than in the past. The WLA sees the value added to the sub-region by Crossrail as heavily dependant on the development and implementation of a network of complementary public transport services which would contribute to the West London economy and relief of environmental pressures. A thorough understanding of the needs and benefits of improved orbital movement is essential to this – to extend the reach and influence of Crossrail more widely across the Sub-region and particularly to ensure that it helps promote the regeneration of our deprived communities. If Crossrail simply increases commuting into central London it will have failed. The WLA would want to work with the Mayor and TfL in developing a strategic sub-regional service network. If there is no clear added value in West London, support for seeking contributions towards Crossrail would be difficult to justify.

38. The WLA supports the Mayor's position on a third runway at Heathrow.

39. Planning for London's diverse places: The WLA supports the Mayor's intention to take up a joined-up approach to planning places and for the delivery of transport and other infrastructure needs to support growth. As set out elsewhere in this response this is as necessary in those parts of London where growth is more incremental and dispersed, as in west London, as it is in areas where there are more large scale developments. It is also more difficult to plan for because of its nature. This does not mean it can be forgotten if the quality of environment and place that the Mayor aspires to (as does the WLA) is to be delivered. It is important that the whole of London is seen to be benefiting from the Olympic and Paralympic Games legacy. The cost to all London council tax payers is substantial and while we acknowledge the contribution to the physical regeneration of east London, their success will be measured by Londoners in terms of their tangible benefits. The WLA wants to see a greater emphasis on pan-London benefits as well as for venues such as Wembley.

Key Questions

40. Does the Policy Response suggested here adequately address the challenges facing planning in London? *The policy responses listed provide a headline statement of what is required. WLA would like to see the Mayor working with the Boroughs and their sub-regional groupings to identify priorities and agree what response are required at a strategic level and what can be determined locally. WLA would like to see specific reference to the movement and transport issues in West London.*

41. Are there other responses that should be considered? *See above.*

42. How should we strike the balance between meeting the challenge of growth and improving quality of life? *This is perhaps the most difficult challenge. As with so many planning matters it will inevitably be a question of balance with no absolute priorities. For West London and the outer Boroughs there is always the danger that growth could compromise their attractiveness as the preferred home of the majority of Londoners. Maintaining and improving environmental quality is therefore very high on the agenda, but at the same time if this is at the expense of accommodating growth it would prejudice the dynamics of the economy and community, leaving essential housing needs unsatisfied. A consensual understanding of the need for growth and the change that accompanies it is paramount, with the proviso that this cannot be at the expense of quality of environment and place. This will require joint GLA/Sub-regional partnership/Borough infrastructure planning initiatives in all regions.*

Making it happen

43. The WLA is of the view that any further changes to the London Plan should take the form of a complete review. The partial reviews have been unsatisfactory in that they did not allow the consideration of the broader implications of policy change and this was frustrating to stakeholders and, we understand, to the Enquiry Panel.

44. In advance of a complete review the Mayor should examine what can be done in the form of revising or preparing SPG/BPG/IR to reflect changing circumstances and emphasis. The WLA does however have concerns over what seems a large number of SPGs with the resource implications this would have, both for the Mayor's staff and stakeholders. Further consideration should be given to this programme in terms of priority and any possible delay to the London Plan review.

45. The WLA supports the Mayor's intention to engage interested parties in the preparation of supplementary documents at an earlier stage. The Boroughs will be the main agents for the implementation of the guidance and as such can make a significant contribution to ensuring their effectiveness.

46. It will be essential that the Mayor's Housing, Transportation, Climate Change and Economic Development Strategies are reviewed in parallel with

planning policy development to ensure consistency and that all of the mayor's agencies are working together to the same agenda. While these strategies require the same level of research and thought they do not have to undergo the same statutory procedures as the London Plan. They can be put in place over a shorter timescale and be taken into account in LDF development and planning decisions.