



**Executive**  
10<sup>th</sup> October 2005

## **Report from the Director of Environment & Culture**

For Action

Wards Affected:  
ALL

### **West London Sub Regional Development Framework**

Forward Plan Ref: E&C-05/06-016

#### **1.0 SUMMARY**

- 1.1** This report provides a brief summary of the Mayor of London's Sub-Regional Development Framework for West London, and proposes a response on behalf of the Brent Council.

#### **2.0 RECOMMENDATION**

- 2.1** That Members agree the proposed response on behalf Brent Council, as set out in paragraphs 3.12 – 3.21 and the schedule which forms Appendix 1, and that these be sent to the Mayor of London.

#### **2.2 DETAIL**

##### Context

- 3.1** The London Plan is the Spatial Development Strategy for the whole of London prepared by the Greater London Authority (GLA) and it was formally adopted in February 2004.

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3.2 The Sub-Regional Development Framework (SRDF) is the sub-regional implementation plan for the London Plan. It is to provide guidance on all matters of spatial development and related areas, ranging from transport to community infrastructure, but with a major emphasis on housing. A draft SRDF has been prepared in each of the five London sub-regions. The Mayor is also currently drawing up formal Alterations to the London Plan which will comprise revised strategic planning policies dealing with housing capacity in London and provision for Waste Management. These will not be available for public consultation until later this year.

3.3 The SRDF is the document that will be used to implement the London Plan at the sub-regional level. Whilst the SRDF is a non statutory document:

- future borough planning, e.g. Local Development Frameworks, will need to be advised by it.
- The Mayor intends to use the SRDF to inform the review of the London Plan which will start in 2006.

3.4 The SRDF also seeks:

- To expand the role of the sub-region in delivering key elements of the London Plan and to present an integrated view of the future of the sub-region.
- To ensure that mechanisms and timetables are in place to deliver key milestones
- To co-ordinate the preparation of key integrated planning frameworks for key sites or areas in the sub- region

This should also encourage all partners to plan strategically for the long term.

### **The SRDF's Strategic Priorities and Major Challenges**

3.5 The GLA's priorities for West London, as set out in the SRDF, are:

- to help maintain economic success by improving transport linkages;
- ensuring high quality commercial and residential property availability;
- improving public services and the natural environment and supporting the provision for the skilled workforce that is increasingly required;
- linking areas of deprivation with employment opportunities through labour market and skills initiatives; and
- maximising the benefits from the new national stadium at Wembley and the growth potential around Heathrow airport.

3.6 The major challenge for the SRDF is to set out how the projected growth in West London's population, of just over 100,000 to 1,535,000 by 2016, is accommodated. It is predicted that this will result in an extra 86,000 jobs (14 % increase) and that 59,400 new homes will be needed in West London between 1997 and 2016. Brent and Ealing are expected to have the highest rates of population growth.

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- 3.7 It is expected that this will result in additional pressure on existing commercial land to intensify its use, and to accommodate a greater number of employees per square metre.
- 3.8 The draft SRDF suggests a very small release of employment land up until 2016.
- 3.9 The SRDF recognises that significant sections of the West London economy have strong global connections.
- 3.10 The key tension for planning, therefore, is to manage the rising demand for housing land and balance this against the need to ensure that there is sufficient employment land (industrial, warehousing and offices) to meet future needs.

### **Formal Consultation Process**

- 3.11 The SRDF was launched on the 4<sup>th</sup> July and is available for public consultation until the 28<sup>th</sup> October 2005. As well as the individual response on behalf of Brent Council set out in this report, comments are also being fed, on behalf of the borough, into a response to be made by the West London Alliance. The Mayor of London will make changes to the draft development framework in light of comments received, with a final version to be produced before the end of the year.

### **Main Issues for Brent**

- 3.12 There is some uncertainty about the status of the final document and, in particular, what weight should be attached to it in the determination of planning applications. Its purpose is described as “to provide guidance on the implementation of policies in the London Plan in order to deliver a sustainable and prosperous future for the sub-region”. However, it is not Supplementary Planning Guidance or a Supplementary Planning Document and it is your officers’ view that it should, therefore, only be considered as advisory rather than guidance which must be adhered to.

#### **Pressures on Land**

- 3.13 A key issue for the sub-region, with particular relevance for Brent, concerns the balance between population growth and demand for housing, and the amount of land needed for employment purposes. The SRDF states that only 4 hectares of employment land (land for Business and Industry) should be released per annum in the whole of West London. This means that there are likely to be few opportunities for new housing from former employment sites. This is potentially problematic for the Borough, particularly when seen in the context of a likely significant increase in the Borough’s housing target figure arising from the London-wide housing capacity study. (The new housing target figure for the Borough will be included in the formal Alterations to the London Plan which are scheduled for public consultation later this year.)

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- 3.14 It is also apparent that the estimates of demand for employment land have not taken into account the future need for land for waste management purposes. It has been estimated on behalf of the Mayor of London that an additional 3.6 hectares per annum is required in West London up to 2020. As the source of this land is likely to be from the existing employment land stock, then it means effectively that there should be a negligible release of such land for other uses over the foreseeable future.
- 3.15 A major problem that is identified in the SRDF, and which has not been addressed, is the difficulty of identifying sufficient land to provide new, much-needed, family accommodation. Brent has an acute need for family-sized social housing. However, pressures on land mean that most of the new housing likely to be built in the future will be at higher densities than in the past, and in locations in or close to town centres where taller buildings are more appropriate. Indeed this is advocated by the SRDF. However, such housing is generally not suitable for accommodating high proportions of families with young children. It is probable, therefore, unless alternative sources of housing land come forward, that the particular housing problems that the Borough faces will not be resolved by most of the new accommodation that is built.
- 3.16 In addition to the pressures on land outlined above, growth also results in a need for land to meet the social infrastructure requirements of an expanding population, particularly health and education needs.
- 3.17 A further concern is that growth is to be accommodated without any significant enhancement of public transport. In particular, no improvements are proposed to orbital public transport. At the same time radial public transport routes are heavily congested at peak times and may be unable to cope with future demand. The SRDF does not identify any proposals to increase the capacity of the public transport system in Brent despite the fact that the Borough includes two major Areas of Opportunity and an Area for Intensification.
- 3.18 It is a major concern that the accommodation of growth up to the levels projected for the sub-region could result in pressures on health and education services, or that the targets for housing provision will not be met. There will also be a substantial impact from growth on the already congested transport networks unless there is investment in new capacity.

## Town Centres

- 3.19 Brent has a number of centres which have declined over the years, which now serve a largely local catchment area and would benefit from regenerative investment. In order to attract such investment however, there must be a prospect of a reasonable return for developers. The basis for providing such a return would be a recognised demand in the centres for new retail floorspace. According to studies carried out for the Mayor, and reflected in the SRDF, there is a potential need for an additional 185,000 sq metres of comparison goods floorspace in the west sub-region of which 29,000 sq metres is in Brent. However, in allocating the need for new floorspace to individual centres it has been estimated that need at Wembley amounts to only 5,000 and at Kilburn only 4,000 sq metres. This is because the methodology for allocating floorspace need is based upon the relative attraction, size and turnover of existing centres and therefore the majority of the floorspace is allocated to the large centres such as Ealing, Harrow, etc. This has the effect of further polarising retail activity in fewer, larger centres and means that for those centres where investment is badly needed, such as Wembley, there is no incentive for developers to promote schemes because there is apparently very little need for additional floorspace. It is considered that the SRDF is too detailed in allocating floorspace need to individual centres and that this column should be deleted from the relevant tables.
- 3.20 Wembley is shown to be only a Secondary location for hotel development in table 1D.3 whilst Park Royal is given as a Primary location. Clearly Wembley, as a major visitor destination should be a Primary location whilst Park Royal, which does not benefit from particularly high levels of public transport accessibility, would be more appropriately considered as a Secondary location.

## Opportunity Areas

- 3.21 The targets for housing at Wembley (only 400 new units) should be changed to 5,000. Willesden Junction Area for Intensification (part in Brent) has a target for 500 homes which does not look achievable. This should be reduced substantially.

## FINANCIAL IMPLICATIONS

- 3.22 There are no financial implications arising directly from this report.

## 5.0 STAFFING IMPLICATIONS

- 5.1 Participation in the process of preparing the SRDF and commenting upon drafts makes use of existing staff resources

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## **6.0 ENVIRONMENTAL IMPLICATIONS**

- 6.1 The London Plan, together with Brent's UDP 2004, guides and controls the development of land and, consequently, the impact of development upon the environment. The SRDF will influence the contents of both the reviewed London Plan and Brent's new Local Development Framework which will replace the UDP.

## **7.0 LEGAL IMPLICATIONS**

- 7.1 The London Plan is now part of the statutory Development Plan for Brent (together with Brent's UDP) to which the consideration of planning applications should have regard. Although the SRDF for West London is to be a non-statutory document, both Brent's new LDF and the review of the London Plan will be informed by it and will be influenced by its content, e.g. the level of employment land that can be released to other uses. There is, however, some uncertainty about the 'weight' that will be afforded to the document as a material consideration in the determination of planning applications.

## **8.0 DIVERSITY IMPLICATIONS**

- 8.1 The SRDF will have an influence on a range of planning issues across the region which will inevitably impact upon the ability of development and the use of land to meet the needs of Brent's diverse communities, e.g. the availability of land and buildings for community facilities.

## **9.0 CONCLUSIONS**

- 9.1 Although the framework has much to commend it, and in particular it brings together a large body of information about development trends, etc. in West London, there is some concern about the weight that will be applied to it in determining major planning applications. It also seems that the full implications of the various competing demands on land have been fully worked through and that there is a danger that merely accommodating growth in the sub-region without providing the necessary social and physical infrastructure could lead to major problems in the future.

## **10.0 BACKGROUND INFORMATION**

### **Details of Documents:**

- 10.1 The London Plan: Spatial Development Strategy for Greater London, 2004  
Working Draft of West London Sub-Regional Development Framework
- 10.2 Any person wishing to inspect the above papers should contact Ken Hullock, The Planning Service, Brent House, 349 High Road, Wembley, Middlesex HA9 6BZ, Tel: 020 8937 5309

**Richard Saunders**  
**Director of Environment & Culture**

**Chris Walker**  
**Director of Planning**

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## APPENDIX 1: PROPOSED RESPONSE TO WEST LONDON SUB REGIONAL DEVELOPMENT FRAMEWORK ON BEHALF OF BRENT COUNCIL

Specific Comments	<i>{insert name}</i>
<b>Introduction</b>	
Para 8	There is considerable uncertainty as to how much weight will be attached to the document as a material consideration in determining planning applications. Given that some weight will be attached to the document, care should be taken that there is no introduction of new planning policy and that it merely an implementation plan.
<b>Part One</b>	
Para 19	Brent is not aware of any proposals to expand Cricklewood centre. It is not clear what basis there is for suggesting that Cricklewood could be re-categorised as a major town centre. Liaison between Brent, Barnet and the GLA is needed.
Para 21	There is an overemphasis on the ‘good supply’ of public transport in the sub region. Orbital public transport for example is considered to be very poor. Existing main radial public transport services are often very congested so supply could be considered to be insufficient and there are no proposals to increase this in Brent (and presumably in other West London boroughs).
<b>Part Two</b>	
<b>Section 1: sustainable growth</b>	
<b>A. Housing</b>	
Para 39	Para 39 highlights a major problem that should be addressed, i.e. the difficulties of identifying sufficient land to provide new, much-needed, family accommodation.
<b>Proposed actions 1A</b>	
Point 1	Concerns about the housing targets in the HCS, which may be at odds with the estimate for a relatively low level of release of employment land in West London
Question 1A	It is considered that stronger guidance is needed for the provision of affordable housing in West London..
<b>B. Employment &amp; Offices</b>	
Para 43	The interim results, showing employment growth as only 62,000 jobs 2001 – 2016 for the region, is a significant reduction on the level of employment growth envisaged in the London Plan. Some assessment of the implications of this is needed, particularly as it relates to the need for employment land.
<b>C. Retail</b>	
Para 53	Not clear if 45% of new retail floorspace in the pipeline in out of centre locations includes Wembley. Permission in Wembley was granted on the basis that it was edge-of-centre. This was accepted by the Mayor of London.
Para 54	Considered that estimates for comparison goods floorspace need by centre should also be treated with caution.
<b>Proposed actions 1C</b>	
Point 1	The estimates given of comparison goods floorspace need by centre are likely to result in an increased polarisation of retail activity, with those existing large centres becoming even more dominant whilst centres that have declined, and are

	in need of regeneration, are not seen to have a significant need for new floorspace. As a consequence, they will be unable to attract the investment necessary to regenerate them effectively. Table 2.2 is at too detailed a level and the estimates of comparison goods floorspace needs should be deleted.
<b>E. Social infrastructure</b>	
Para 62	It should be noted that a large part of Brent is a Health Action Zone
Para 71	Brent still experiences relatively high levels of unemployment in a number of wards.
<b>Proposed actions 1E</b>	
Point 2	The framework should provide a spatial estimate (by borough) of new education or health needs related to likely housing (and hence population) growth.
<b>G. Industry &amp; warehousing</b>	
<b>Proposed actions 1G</b>	
Point 8	This appears to be creating new policy (albeit interim) which the framework should not be providing.
<b>Part Two Section 2: allocating growth</b>	
<i>Table 2.1 – growth requirements</i>	The estimated reduction of industrial land of 40 hectares across west London runs counter to the findings of the recent study of waste management requirements which estimates that a large amount of industrial land is needed for waste management use.
Para 106	The implication of increased housing densities and intensification and mixed use development is that there will be little opportunity to provide for family housing, which is recognised as an urgent need in the social housing sector.
<b>A. WL town centre network</b>	
<i>Table 2.2 – metro &amp; major centres</i>	Delete column of comparison goods floorspace needs (see comments on Proposed actions 1C above.) Total floorspace figure for Wembley town centre is inaccurate. Brent surveys indicate 50,000 sq metres ground floor gross floorspace. Would also question accuracy of floorspace figure for Cricklewood town centre.
<b>Proposed actions 2A</b>	
Point 1	See comments on Proposed action 1C which also apply here.
<b>E. Transport &amp; accessibility</b>	
Para 129	A fundamental concern is that growth will have to be accommodated in areas where there are no significant enhancements of public transport proposed because these are so limited across the sub-region. In particular there are no improvements proposed to orbital public transport with the result that the number of car-trips, and commuting into central London, will increase.



<b>Part Two Section 4: Environmental improvement</b>	
<b>4B. Sustainable development, construction &amp; energy</b>	
Para 178	There should be some indication as to why particular areas are considered suitable for definition as Energy Action Areas.
<b>4D. Open space &amp; Blue Ribbon Network</b>	
<b>Para 188 – Regional Parks</b>	It is not clear how a regional park, if it does not already exist, is going to be ‘found’ or created.
<b>Part Two Section 5: Development tools &amp; processes</b>	
<b>5B. Housing mix</b>	
<b>Proposed action 5B</b>	
<b>Point 1</b>	The need for larger, family-size, social housing units is acute but many of the major schemes coming forward are not appropriate for families because of their location and the density/height. Where sites become available for housing development and where family housing would be appropriate, then this should be maximised by ensuring that there is a very high ratio of 3 bed (or more) units.
<b>5D. Tall buildings</b>	
Para 209	Parts of the opportunity area at Wembley (including parts of the town centre) are considered to be appropriate locations for tall buildings.

<b>Annexes</b>	
<b>Annex 1: Town Centres</b>	
Comments on Annex 1	It is not considered appropriate to include, at sub-regional level, indicative comparison goods floorspace need figures for individual centres for the reasons outlined in the comments on Proposed actions 1C above. Liaison with Barnet council and the GLA is necessary to establish the role and status of Cricklewood centre.
<b>Annex 2: Opportunity &amp; intensification areas &amp; SELs</b>	
<b>Wembley opportunity area</b>	
LP site area, projected jobs, target homes	Target homes figure for Wembley needs to be substantially revised (suggest 5,000).
Key issues	An additional key issue to be addressed is the provision of community infrastructure, particularly new school capacity, to meet the needs of the expanding population.
Utility infrastructure issues	Measures to provide for storage of floodwater / control of surface water are

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	already being implemented on development. Restoration of river Brent already part completed.
Indicative phasing	New homes figure to be amended as above.
Emerging revised capacity estimates	New homes figure 5,000, 40% affordable
<b>Park Royal opportunity area</b>	
Key issues	Possible major opportunity for mixed-use development with closure of Guinness brewery.
Current status	Would not refer to Park Royal as a 'site'. Suggest 'strategic employment area'. SPD being drawn-up for Guinness site.
Indicative phasing	Crossrail is not proposed to serve Park Royal.
Working boundary map	Precise boundary needs to be re-considered, particularly as it relates to Willesden Junction Area for Intensification.
<b>Intensification Area Willesden Junction</b>	
LP site area, projected jobs, target homes	There is a need to give careful consideration to the rationale for Willesden Junction as an Area for Intensification. The indicative boundary appears to have been drawn too widely. Any 'intensification' should be focussed on, and around, the station itself. The rest of the area should be incorporated into Park Royal Opportunity Area. Only a very limited opportunity (if any) to provide new housing. Target homes should be no more than 100.
<b>Annex 4: Detailed tables, maps &amp; figures</b>	
<b>Part 2, section 1</b>	
<b>Table 1A.4</b> - affordable housing completions 2003/04	As yet it has not been possible to check this table against our own data. Verification of the figures is needed.
<b>Table 1D.3</b> - primary & secondary hotel development locations	Wembley should be seen as a Primary location for future visitor accommodation It is considered that Park Royal should be seen as a Secondary location because there are no major town centres and public transport access is generally not good.
<b>Table 1E.1</b> - major hospital improvements	A major rebuild of Central Middlesex hospital is ongoing.