



Executive
18 January 2010

**Report from the Director of
Environment and Culture**

Wards affected:
ALL

**Comments on the Mayor of London's Transport Strategy,
Economic Development Strategy and Draft Replacement
London Plan – Consultation Response**

Forward Plan Ref: E&C-09/10-30

1.0 Summary

1.1 This report sets out comments on the consultation draft of the Replacement London Plan. The London Plan is legally part of the council's development plan and must be taken into account when planning decisions are taken. It is therefore important to comment on the Replacement Plan that will set planning policy for the whole of London and for this borough in particular. The Mayor of London is also charged with producing a number of strategies including a Transport and an Economic Development Strategy and these are also out to public consultation. The Mayor's Transport Strategy sets out his plans for London's transport over the next 20 years. The Economic Development Strategy is the Mayor's broad vision to keep London an economic success. Officer's comments on the Replacement Plan and the two strategies are set out in the report. At its meeting on 10 December 2009, the Planning Committee agreed the above comments on the draft Replacement London Plan (subject to any further comments from the Executive). In order to meet the deadline for submission of comments officers have submitted the above comments to the Mayor of London but have said that this is subject to any further comments from the Executive.

2.0 Recommendations

That Executive agrees
2.1 The comments on the Consultation Draft of the Replacement London Plan; and

Executive
18th January 2010

Version No.4.0
17th December 2009

- 2.2 The comments on the Mayor's Transport Strategy; and
- 2.3 The comments on the Mayor's Economic Development Strategy; and
- 2.4 That these comments on the Transport Strategy and the Economic Development Strategy be sent to the Mayor of London to form Brent Council's response to the consultation on these documents and that the Council confirms that it has no further comments on the draft Replacement London Plan in addition to those set out below.

3.0 Detail

Replacement London Plan

- 3.1 The Replacement London Plan was published in October 2009 for public consultation. Any comments on the draft plan must be submitted by 12 January 2010. The next stage will be an Examination in Public in summer-autumn of 2010 and the new plan being adopted probably in early 2011. This Replacement Plan is intended to replace the 2004 London Plan with the 2008 alterations. It is intended to be the framework for the development of London until 2031 integrating the Mayor's transport, economic development, housing and cultural strategies as well as addressing other social and environmental issues. It provides the policy context within which boroughs set their planning policies and the basis on which the Mayor considers strategic applications referred to him. Although the Mayor was keen to have a Replacement Plan rather than a further amendment to the existing plan, many of the key policy drivers remain. Many of the big issues, such as sustainability, are moved forward, but the direction of travel remains fundamentally the same. This report concentrates on commenting on the key changes to policy and occasionally on the lack of change to the Replacement Plan. There is of course much to support in the Replacement Plan also and support to key policy changes is indicated.

Mayor's Transportation Strategy

- 3.2 The Mayor's Transport Strategy was also published in October 2009 for public consultation with a deadline of 12th January 2010 for responses. The Strategy will not have an Examination in Public. The Mayor will consider any responses, alongside responses to the Replacement London Plan and Economic Development Strategy, and is anticipated to publish the final Strategy in Spring 2010. The Strategy sets out the Mayor's transport goals, policies and proposals to support the development of London, as set out in the Replacement London Plan and Economic Development Strategy, through the period to 2031. The Strategy will provide the framework against which the Mayor, through Transport for London (TfL), and the London Boroughs will develop local transport policies and deliver projects and initiatives. The Strategy is cross-referenced against TfL's current Business Plan which sets out TfL's programme of investment in transport to 2017/18. Subsequent to publication of the final Mayor's Transport Strategy every London Council will be required to produce a Local Implementation Plan, The

for the Mayor's approval, setting out how it's transport policies and proposals will support implementation of the Mayor's Transport Strategy. Once published, the Mayor's Transport Strategy will replace the current Strategy which was published in 2003. The Strategy has been developed from the Mayor's Direction of Travel document on transport ("Way to Go") and the Mayor's Statement of Intent which were published for consultation in November 2008 and May 2009 respectively.

Mayor's Economic Development Strategy

- 3.3 The Mayor's Economic Development Strategy completes the Mayor's suite of three strategies published for public consultation in October 2009. The 12th January 2010 is also the deadline for responses. Entitled 'Rising to the Challenge', this draft strategy builds on a consultation from earlier in the year identifying key proposals for the EDS to take forward. The strategy sets out the Mayor's ambitions for economic development in the capital through five overall objectives, through to 2031 but with the acknowledgement that many of its policies are focused on the immediate future. The strategy will be used to provide the GLA group and other strategic organisations with a vision and policy direction on economic development. It also aims to clarify the roles and responsibilities of other partners that contribute to London's economy.

The LDA's Investment Strategy for 2010-2013 was very recently published for consultation. It sets out the LDA's investment strategy with regard to regeneration and economic development. However at the time of writing this report, this document has not been available to view on the LDA website and therefore will not be covered in this report.

Replacement London Plan Detailed Analysis

- 3.4 The proposed Replacement Plan is organised under eight chapter headings. Comments on the Replacement Plan are made under these headings. Replacement Plan Policies consist of strategic statements of Mayoral policy, planning decisions policy and LDF advice to the boroughs. This report will attempt to cover the key issues for the borough but members may wish to add others. The whole Replacement Plan can be found on the GLA's website via this link: <http://www.london.gov.uk/shaping-london/london-plan/docs/london-plan.pdf>

1 Context and Strategy-covers main issues such as population and infrastructure growth, climate change, poverty and disadvantage and the Mayor's vision and objectives

2. London's Places-covers regions, industrial land and town centres, open space networks

3. London's people-covers housing, education and health

4. London's Economy

5. Response to climate change

6. Transport

7 Living Places and Spaces-covers place shaping, protecting historic environment and open space, safety, air & noise pollution.

8. Implementation, Monitoring & Review

Context and Strategy

- 3.4 The overall strategy is to support continued population growth securing increased levels of employment and ensuring sufficient infrastructure is provided. The challenge of climate change is dealt with, even with enhanced growth. The plan's objectives are not so far removed from the previous London plan but the Mayor intends to take a more consensual approach to planning, giving the boroughs more say in many planning matters. This change in emphasis is welcomed.

London's Places

- 3.5 This section deals with the general spatial strategy for London. The Plan recognises Park Royal and Wembley as Opportunity Areas and the London-Luton-Bedford growth corridor-these are unchanged from the current London Plan, although the Opportunity Area at Colindale has been extended to include the Brent side of the Edgware Road and it is now called Colindale/Burnt Oak. Policy 2.8 seeks to recognise and address the orbital transport needs of outer London referring to Policy 2.6 in the Transport section of the Replacement Plan. However, the proposals and map within policy 2.6 demonstrate the lack of proposed investment in orbital transport proposals. The Replacement Plan needs to recognise and promote a wider range of potential proposals at the very least and make a greater commitment to orbital transport improvements.
- 3.6 Policy 2.16 identifies strategic outer London development centres which the mayor suggests bringing forward distinct business offers. Wembley is identified as having greater than regional importance for leisure/tourism. Although the Replacement Plan recognises that more work will be done through the designation of centres such as Wembley as "*opportunity areas*", your officers are concerned that the designation is a little one dimensional. Wembley will provide a significant amount of new specialist and non-specialist retail floor space which will complement its leisure role and this should be referred to in the table.

London's People

- 3.7 The Replacement Plan supports the retention of existing community facilities and encourages the identification of clusters of specific groups that need cultural facilities, meeting places or places of worship. This policy is welcomed.

- 3.8 The current London Plan seeks to provide 30,500 additional homes per year and the new proposed target is 33,400 homes (table 3.1), an increase of 2,900 units per annum. This increase seeks to make up for the current shortfall in the delivery of market and affordable housing sectors owing to the current recession. However, Brent's ten year target is 10,650 or 1,065 per annum. This is marginally lower than the current London Plan target and is welcomed as a reasonable and achievable minimum figure.
- 3.9 The density matrix of the last London Plan is proposed to be retained but with more useful qualifications that it is not the sole consideration and developments must meet other plan policies including design principles, housing choice, play provision and sustainability issues. A specific and welcomed change is the introduction of minimum space standards (table 3.3) that are above Brent's current Design Guidance (SPG17). For example one bed flats should be a minimum of 50m² (45m² in SPG17), 3 bed 5 or 6 person units, 86-100m² (80-85m² in SPG17). Providing larger units offsets some of the impacts of higher density development and addresses the fact that we have among the smallest dwelling space standards in Europe.
- 3.10 There will be greater emphasis on the design quality of new residential development (policy 3.5), an offer to boroughs that they can introduce a presumption against development on back gardens, that large housing sites should deliver necessary infrastructure (3.7) and that a greater range of choice in housing be delivered, notably, affordable family homes (policy 3.8). These policies, which in total move the emphasis from maximising housing density to optimising it, giving more weight to the provision of family housing for example, are supported by the council. Regarding policy for the design of new buildings, policy 7.1 under D states that design "...*should help reinforce or enhance the character, legibility and permeability of the neighbourhood.*" This new emphasis on local character is welcomed.
- 3.11 Policy 3.10 and Table 3.4 requires Brent to provide an additional 20 Gypsy and Travellers pitches out of the 538 required in London. Brent's requirement is the 11th highest in London. The policy does not assist in providing resources for such provision and the Replacement Plan should make it clear that such provision comes with an allocation of resources from the Mayor or from central government that recognises the capital and revenue costs of such provision. It is also likely that the council will need to secure private sites for gypsy and travellers and will need to undertake CPO activity which requires some up-front funding commitments.
- 3.12 The 50% strategic affordable housing target is abandoned (Policy 3.12). This long-standing policy objective will be dropped and replaced with a flexible policy that 'seeks to maximise' affordable housing provision with an average target of at least 13,200 more affordable homes per year in the capital. Clarification is required on this change because it appears to set a new target of 40% i.e. 13,200 as a proportion of 33,400. It will be up to boroughs to set an overall target in

terms of numbers or proportions. There is greater support for intermediate housing (Policy 3.12). This is proposed to change from the 70:30 split between social rent and intermediate tenures to 60:40. This is welcomed but recognition should be given to the problems of funding (both mortgage availability and grant availability) that may make the target difficult to achieve in the short term.

- 3.13 The Mayor wants to see a higher proportion of family housing in the social rented sector. His affordable housing SPG sets out the demand for 42% of all dwellings to be 3 bed or more. This supports Brent's own needs, but such a policy should be included in the Replacement Plan and criteria that allow some flexibility in the target should be set out, such as estate regeneration, the appropriateness of some sites for high levels of family housing and so on.
- 3.14 The Mayor supports (policy 3.17) the protection and enhancement of social infrastructure to meet the needs of its growing population, a matter which Brent supports. It is important, however, that the planning obligation and Community Infrastructure Levy (CIL) policies do not lose sight of these objectives by securing development value in support of other strategic planning objectives at the cost of provision in infrastructure.
- 3.15 The Replacement plan supports the need for new high quality healthcare and education facilities and the protection of existing facilities. Policy 3.19 makes note of the projected shortage of primary school places but offers little of a strategic nature to help secure the necessary financial assistance to bring this about. A clear reference to resourcing through planning obligations and seeking support from government for new school provision in the capital should be added. The comments on the implementation section bring this matter into sharper focus. The Mayor appears to be suggesting a local focus whilst looking to secure S106 funding for a wider range of strategic matters that may not assist boroughs in securing necessary local infrastructure investment, particularly social and community infrastructure.

London's Economy

- 3.16 This section of the plan deals with office, industrial, retail and town centre policy. In terms of offices, while there is a recognition that outer London will provide 22% of total office floorspace growth there is no mention of centres such as Wembley (recognised as one of the few suburban areas that could support new office development longer term in a GLA report on Office development) which could provide new office space in the longer term as part of mixed development. Wembley should be named as an area that can support consolidation of its stock and encouragement of new stock as part of its expanding town centre offer in the longer term. The London Council's response on this matter also make the point that the office market in outer London is diverse and the plan should not treat the whole of outer London as homogenous, unlikely to change over time.

- 3.17 While the general protection of Strategic Industrial Land (SIL) is supported, there is no reference to the current economic downturn and whether the demand analysis conceived at the height of the boom is still appropriate. The concern from Brent is the significant amount of vacant land and buildings in Park Royal and the objection to loss of a small part of the SIL that will enable development of industrial land. Policy should allow for small amounts of enabling development on the edges of SIL that support wider industrial land improvement objectives.
- 3.18 The identification of Wembley as one of London's Strategic Cultural Areas (policy 4.6 and map 4.2) is strongly supported. Either a map or reference to the role in Wembley in London's visitor policy (4.5) should also be made because of its strategic importance in outer London.
- 3.19 Policies for town centres remain much as they were in the 2004 London Plan. Policy 4.7 requires that the scale of retail, commercial and leisure development should be related to the size, role and function of the town centre, and to follow the sequential approach to development. However, there are some issues relating to the classification of centres shared with neighbouring boroughs which need to be addressed if this policy is to be applied appropriately and consistently.
- 3.20 The draft replacement London Plan shows Colindale and Kenton as District Centres whereas Brent's draft Core Strategy classifies these two centres as Local Town Centres. Although these were classified at the time of drafting to be consistent with neighbouring boroughs, Barnet now describe Colindale as a District Centre in their Area Action Plan for Colindale therefore, in the interests of consistency, Brent should accept this. However, Kenton continues to be classified as a Local Centre in Harrow's draft Core Strategy as well as Brent's therefore it is recommended that representations be made to the Mayor suggesting that it is consistent for the London Plan to also recognise this.
- 3.21 The Mayor also introduces an affordable shop units policy (Policy 4.9). Where appropriate, feasible and viable, the Mayor will seek the provision of affordable shop units when considering large retail developments (typically over 2,500 sq m). This could be used, the Mayor advises, in areas or in developments that have a shortage of such provision.

Response to Climate Change

- 3.22 The Mayor, in line with his target to reduce CO2 emissions by 60% by 2025 (on 1990 levels), looks at a lean (reduce energy demand through design), clean (decentralised supply) and green (renewable) approach. The change in emphasis in the current London Plan from renewables to greater flexibility on tackling climate change is welcomed. Also, the targets are more ambitious than the adopted

London Plan in that they provide an incremental CO2 reduction throughout the lifetime of the London Plan, which the previous London Plan did not do. The plan proposes that 25% of the heat and power used in London should be generated through the use of local decentralised energy systems by 2025. How this will be achieved is not explained in any great detail. It is anticipated that major developments will be required to provide this. The plan sets targets to minimise carbon dioxide emissions from major developments and all new major residential developments and non-domestic buildings will have to be zero carbon after 2016 and 2019, respectively. The council welcomes a clearer approach to non-residential buildings and energy targets than has been the case hitherto.

- 3.23 There are two comments to be made on policy 5.2 and policy 5.5 (Decentralised Energy Networks). The council's experience of decentralised energy networks is that they are possible but require some significant upfront funding which is not justified by the base load needed to make them viable. The Mayor should agree to act with energy suppliers and Government principally in order to secure investment funding to bring forward and secure key decentralised networks at an early stage of the development process. The second comment is that it is by no means certain that zero carbon development will be viable by 2016 and the policy should allow for some flexibility. A new policy emphasises the importance of retrofitting, and boroughs are expected to identify opportunities to reduce CO2 from existing stock and develop detailed policies on retrofitting. This is supported but needs a realistic assessment and identification of the resources required for such action.
- 3.24 The targets for the proportion of London's waste to be processed within London have been dropped and replaced by a less rigid policy (5.16) of managing as much of London's waste within London as practicable. This is supported, as there are opportunities to process West London's waste just beyond London's boundary whilst still meeting the objective of dealing with the waste in close proximity to the source.
- 3.25 In recognition of declining levels of municipal waste arisings, the Mayor has reviewed the waste arisings and, consequently, the amount that is apportioned to boroughs for dealing with. The revised figures have been published separately from the draft Plan in October and were made available for consultation in December. These figures will be important in assessing the amount of land needed for waste management purposes to be identified in the forthcoming joint West London Waste Development Plan Document. They show that the overall (Municipal Solid Waste and Commercial and Industrial Waste) projected waste arisings in Brent are down from 355,000 tonnes for 2010 in the current adopted London Plan to 338,000 tonnes for 2011 in the newly published figures. This results in an apportioned figure for Brent (i.e. that which is required to be dealt with within Brent) reduced from 284,000 tonnes in the existing Plan to 249,000 tonnes in the new estimated figures. The outcome therefore, when the revised

figures for West London are combined, will be a need for less land to be identified than previously estimated in the joint West London Waste Development Plan Document. Brent should, therefore, express support for these revised projections.

Transport

- 3.26 The plan seeks financial contributions of up to £600 million towards Crossrail and other strategically important transport infrastructure from new development, subject to viability. The council has already commented on the application of the crossrail Levy and these concerns still stand. Policy 6.4 sets out the main priorities for public transport system improvements, which include cross London and orbital rail links. This would be welcomed but, as Map 6.1 shows, there are no significant orbital transport improvements connecting Brent's key centres with adjoining boroughs such as Ealing-Wembley-Brent Cross. The draft Replacement London Plan continues to lack any substantive proposals to improve orbital public transport in outer London: this matter should be in a long term strategy and, at the very least, other ideas to better link town centres orbitally, especially significant improvements to bus services such as that which would be provided by Fastbus, should be committed to. Parking standards in town centres and for office developments can be enhanced where there is a lack of public transport and a regeneration need: this would appear to be a short term expedient over the need to provide better connected town centres in the suburban boroughs.
- 3.27 The plan reiterates the Mayor's opposition to any further capacity increases at Heathrow (policy 6.6), but recognises that airport capacity serving the capital and the south east must be sufficient to sustain London's competitive position.

Living Places and Spaces

- 3.28 This chapter of the Replacement plan re-states previous plan policy to achieve worthy objectives such as building inclusive environments, protecting heritage and views, promoting biodiversity, integrating public realm and providing secured by design environments. The policy on respecting local character in terms of design is fleshed out from previous London Plan policy. Schemes need to have regard to pattern and grain of existing streets in orientation, scale, proportion and mass, human in scale and informed by the surrounding historic environment. This elaboration on existing policy is welcomed. Similarly the policy on Architecture (7.6) sets out more helpful criteria in which to judge schemes.
- 3.29 Previous Mayoral statements had suggested that the future opportunities for tall buildings in London would be extremely limited. Under this change, these will be directed to the Central Activity Zone, Opportunity Areas, Areas of Intensification and Town Centres that have good access to public transport. Policy 7.7 of the Replacement Plan suggests more opportunities for tall buildings in London than

previously thought and, as it accords with Brent's approach in its Core Strategy, the policy is supported.

Implementation

- 3.30 Policy 8.2 on S106/Planning obligations emphasises that priority is to be given to securing contributions for affordable housing, Crossrail and other transport improvements. The Mayor argues that development proposals should address strategic as well as local priorities. This will be important in negotiations with the Mayor's office as he appears to seek a greater proportion of s106 payments that we currently use to mitigate the effects of development locally, as opposed to funding a London-wide infrastructure improvement. The council objects to the policy that seeks to allow for a balance without knowing what the Mayor's Strategic S106 demands are. Brent has produced its own Infrastructure and Investment Framework and the Mayor should do likewise so that boroughs can assess the level of those S106 demands and their soundness. This would allow scrutiny in the same way as happened with the Crossrail levy. Significantly, Policy 8.3 relates to the Community Infrastructure Levy and advises that this will be subject to separate guidance. The Mayor should not impose strategic priorities on the borough through the use of planning obligations and at the same time not assist more in key local infrastructure issues such as local primary school provision. The balance of determination on S106 should be with the borough - this is a proper bow to local priorities that the Mayor espouses.
- 3.31 Policy 6.5D refers to the Crossrail Planning Obligations and the Council is seeking clarification that the 'location' considered reference in the policy, is that of the 'location' of the development relative to Crossrail. This point is being raised by the Council at the Crossrail SPD Examination in Public, to ensure that Brent is not unduly affected by any Crossrail S106 requirements if there are no Crossrail stations in the borough.
- 3.32 Planning Obligations are covered in policy 8.2, with part A proposing a voluntary pooling of contributions across London. There is little benefit to the Council of it being given more weight through the London Plan. The Council will also seek clarification in 8.2L as it refers to 'contributions to the full cost of the mitigation'. It is unclear if this is a percentage contribution of the total cost, or a financial contribution equal to the full cost.
- 3.33 Annex 1 of the plan contains details of areas of Opportunity and Intensification. This list is largely unchanged from the current London Plan, apart from the Colindale Opportunity Area being extended to include Brent sites on the west side of the Edgware Road / Burnt Oak Broadway. Brent has been working hard to develop new areas of opportunity such as Alperton Canal side, developed through the Core Strategy and now being fleshed out in further planning guidance. This proposes a significant new neighbourhood of at least 1600 homes.

This should be included as a new Opportunity Area in the Replacement Plan.

London Plan Concluding Comments

- 3.34 The change in emphasis in giving the boroughs more say in planning their own boroughs is welcomed. However, Brent is concerned that the objective to fund strategic transport and other strategic matters through planning obligations now, and latterly through CIL, indicates a change in the opposite direction.
- 3.35 The London Plan needs to offer a more comprehensive vision and commitment to the improvement of orbital public transport linking outer London town centres.
- 3.36 Wembley should be identified not only as a visitor destination but for its mixed use development including retail.
- 3.37 Brent Council supports the policy of retaining and expanding specific cultural facilities.
- 3.38 The London Plan housing target is supported by the council.
- 3.39 The minimum flat size standards are supported by the council in high density development, as is the move towards improving the design quality of new residential development and optimising rather than maximising density.
- 3.40 The council supports the aim of increasing affordable family housing but seeks a recognition that this may not be appropriate on every site.
- 3.41 The ability to stop back garden development is welcomed.
- 3.42 The council cannot deliver its Gypsy site allocation without a clear understanding of the funding avenues available to secure and develop such sites.
- 3.43 The council supports the protection and enhancement of social infrastructure but is concerned that policy requiring planning obligations pay for strategic planning requirements should not undermine this policy objective.
- 3.44 The shortage of school places requires a more rounded initiative from the Mayor with the boroughs. He needs to support development on suitable sites and to lobby for appropriate funding, including the provision of local S106 funds that will take priority over strategic requirements.

- 3.45 The London Plan should recognise areas such as Wembley that have the potential to deliver office floorspace in the longer term when retail and other facilities may make co-location more attractive.
- 3.46 The council supports the provision of decentralised energy networks but on condition that the mayor works with boroughs, government and energy providers to secure investment that allows their provision earlier in the development process. Retrofitting of existing stock is also supported but needs a realistic assessment of resources identified to undertake such work.
- 3.47 The Mayor should consider small scale enabling development on some SIL sites (on the edge of major SIL areas) where there are significant amounts of vacant land if it brings forward industrial and warehousing development.
- 3.48 The council supports the identification of Wembley as one of London's Strategic Cultural Areas.
- 3.49 The council considers that insufficient commitment is given to the expansion of orbital public transport modes that connect outer London's key town centres, even if this was in the longer term or comprised of substantial improvements to orbital bus services.
- 3.50 The need to better protect existing areas of residential character is supported, while the tall buildings policy appears to be a reasonable way forward.
- 3.51 S106 obligations should prioritise local and not strategic projects until the Mayor has set out a comprehensive Investment and Infrastructure framework at which point the merits of local and strategic needs can be properly debated.
- 3.52 The Mayor should include other emerging areas of opportunity identified by the borough such as Alperton.
- 3.53 At its meeting on 10 December 2009, the Planning Committee agreed the above comments on the draft Replacement London Plan (subject to any further comments from the Executive). In order to meet the deadline for submission of comments officers have submitted the above comments to the Mayor of London but have said that this is subject to any further comments from the Executive.

4.0 Mayor's Transportation Strategy – Detailed Analysis

- 4.1 The draft Mayor's Transport Strategy states that the Mayor's vision is that "London's transport system should excel amongst those of global cities, providing access to opportunities for all its people and enterprises, achieving the highest environmental standards and leading the world in its approach to tackling urban transport challenges of the 21st century."

The draft strategy outlines the six goals the Mayor has set for achieving the vision, which are to:

- Support economic development and population growth
- Enhance the quality of life for all Londoners
- Improve the safety of all Londoners
- Improve transport opportunities for all Londoners
- Reduce transport's contribution to Climate Change and improve its resilience
- Support delivery of the London 2012 Olympic and Paralympic Games and its legacy.

The document is set out in 3 parts:

Part one outlines the vision and goals (as summarised above) together with the outcomes the strategy seeks to achieve, and the context for the strategy

Part two examines the main transport challenges London faces and set out the policies and proposals required to achieve the (six) goals. There are 26 policies within the draft strategy supported by 129 proposals – most of which support more than one policy and goal.

The proposals fall into 6 broad areas:

- Proposals 1 to 49 relate to the management and enhancement of the transport system
- Proposals 50 to 61 relate to the encouragement of more cycling and walking
- Proposals 62 to 81 relate to the improvement of safety and security
- Proposals 82 to 94 relate to the improvement of London's Environment
- Proposals 95 to 113 relate to the reduction of transport's contribution to climate change and improvement of its resilience
- Proposals 114 to 129 relate to management of the demand for travel.

Part three essentially comprises an implementation plan setting out how the Mayor proposes that his policies and proposals will be delivered by the GLA, TfL, the London Boroughs, the Department for Transport (DfT), Network Rail and other transport providers and how achievement will be monitored and reviewed. The implementation plan

covers schemes that are in TfL and other agency's current business plans and hence committed together with projects (generally over the period 2020-2031) that are currently unfunded and hence aspirational.

The whole draft Mayors Transport Strategy can be found on the GLA's website via this link: <http://www.london.gov.uk/shaping-london/plan/docs/>

In that the draft strategy sets out London-wide goals and policies which are supported by combinations of general proposals (for example – Proposal 58: The Mayor.....will bring about a step change in the walking experience in London.) and specific proposals for example – Proposal 39: The Mayor.... will progress a package of river crossings in East London) it is not possible to provide a detailed analysis of the likely impact of the strategy on Brent.

Key policies of concern

- 4.2 The goals set out in the Mayor's Transport Strategy support the vision and objectives set out in Brent's Corporate strategy, in relation to transport. Similarly the policies within the Mayor's strategy compliment the Council's current wider environmental and transport policies. The proposals within the Mayor's strategy are not likely to present a problem when the Council has to produce it's Local Implementation Plan which will put a local dimension to the implementation of transport policies, projects and initiatives.

Any concerns with the Mayor's strategy relate to omissions and areas where there is a need for elaboration rather than concerns over it's content.

London Council's have identified 8 key policies of concern. These are set out below and accurately summarise the areas of concern for Brent. Insofar as the comments set out in 3.34 to 3.52 above relate to transport and the spatial planning policy supported by transport, there is consistency between those comments made (in relation to the draft Replacement London Plan) and those summarised below:

1. Many of the policies in the strategy are aimed at supporting the anticipated growth in population and employment set out in the London Plan and supporting London's town centres. The Mayor now accepts the Outer London Commission's recommendations that future growth should be based around existing town centres rather than focusing growth on a few strategic town centres. He also agrees that the transport focus should be on improving connectivity into and between these centres and the draft strategy contains a number of policies to support this approach.
2. There is a particular emphasis on supporting the development and growth of Outer London town centres and improving orbital links between them as well as radial connectivity to central London. There is a recognition that each town centre is different and that

decisions on local transport are often best made by the boroughs. Detailed transport proposals for each town centre will be developed as part of the London Sub-regional Transport Plan process.

3. The proposals to improve orbital public transport emphasise investing in better journey planning information and improved interchange quality, particularly focusing on strategic interchanges, accompanied by better integration of the National Rail network with other transport modes; and bringing stations, service frequency and quality to minimum standards. There is little mention of new infrastructure to improve orbital transport links.
4. There is a strong emphasis on walking and cycling and the strategy includes targets for increasing the mode share of public transport, walking and cycling from 58 per cent to 64 per cent. There are several proposals relating to cycling including cycle training, raising awareness and cycle parking. Proposals on walking include better journey information, the completion of seven Strategic Walking Network Routes and the Key Walking Route approach. However, the document does not advocate a hierarchy of transport modes nor does it include any reference to a London Walking Plan.
5. The strategy says that the Mayor may consider road user charging schemes if other measures are deemed insufficient to meet the strategy's objectives. The Mayor will also consider imposing charges or tolls to support specific infrastructure improvements, such as river crossings. Any charging scheme would need to take account of local conditions, and be fair and flexible.
6. The draft strategy sets out a number of proposals for reducing carbon emissions from transport. In particular, it states that the Mayor will take the necessary steps to achieve the required contribution from ground based transport to achieve a 60 per cent reduction in London's CO₂ emissions by 2025 from a 1990 base. Progress towards this will be reported annually in the Travel in London report.
7. The draft strategy also sets out a number of measures aimed at improving air quality including behavioural change, reducing emissions from public and private fleets and tackling air quality 'hotspots' as well as further use of the Low Emission Zone. It also includes a proposal to incentivise low emission vehicles through pressing for changes to parking regulations. The draft Air Quality Strategy includes further proposals for improving air quality which will guide the strategy's development with respect to air quality
8. The draft strategy contains proposals to promote electric vehicles but does not say anything about how boroughs' concerns about increased parking stress and congestion and the potential to detract from walking and cycling will be addressed.

Proposed response to the draft Mayor's Transport Strategy

Executive 18 th January 2010	Version No.4.0 17 th December 2009
--------------------------------------------	--------------------------------------------------

- 4.3 London Council's response to the draft Mayor's Transport Strategy was agreed at the London Council's Leaders' Committee on the 8th December 2009 and London Council's TEC Committee on 10th December 2009 and is summarised at in Appendix "A".

That response, with the inclusion of the transport related comments identified as an appropriate response to the Replacement London Plan and the following additional comments, provides the basis of an appropriate response to the draft strategy:

- There is no detail in the strategy on how town centres, opportunity areas and major developments are to be served with transport infrastructure and services to support the envisaged development growth and how these necessary transport improvements would be funded. The strategy should address this.
- The narrative on investment in orbital transport in West London in the strategy is focussed on the North and West London (London Overground) lines and a small number of strategic interchanges. Whilst those investments are necessary and welcomed the approach, and hence the narrative in the strategy, needs to be broadened to cover opportunities for orbital transport connectivity with radial lines, particularly with Crossrail.
- The strategy asserts that London currently has a comprehensive orbital bus network enabling direct orbital journeys between neighbouring centres in Outer London. This overstates the case in West London where there are gaps in orbital provision and fails to recognise that the speed and frequency of much of that provision fails to sufficiently encourage potential users to make orbital journeys by bus. The strategy needs to provide commitment to the development of high-speed, high quality bus-based orbital services such as the Wembley to Park-Royal "Fastbus" scheme. Greater flexibility in bus routing, and especially taking greater account of the views of the Boroughs, where local knowledge can help to optimise passenger numbers, is likely to lead to more effective services and better support the outer London strategic centres.
- There are locations in West London, within and close to the boundary of Brent where bottlenecks occur regularly on the highway network. Whilst the combination of the public transport investment, smoothing traffic flow and smarter travel measures and initiatives described within the strategy, may have a generally positive impact on the number of vehicle based journeys it is envisaged that these bottlenecks will remain – impacting negatively on air quality and restraining growth. The strategy needs to contain proposals for identifying and addressing the problems at those locations.

- 4.4 The West London Partnership (WLP), of which Brent is a member, is currently developing its response to the draft Mayors Transport Strategy. That response will relate proposals in the strategy to the Partnership's 10 Point Transport Plan for West London. The response will be consistent with that of London Council's and will endorse the specific concerns outlined above. Inevitably the WLP response will cover local issues which impact on partners but not on Brent. However it is anticipated that the final WLP response will be one that can be endorsed.

Mayor's Economic Development Strategy-detailed Analysis

- 4.5 The EDS is broadly divided into three sections comprising of:
- vision and goals for the strategy, underpinned by an economic evidence base;
 - details setting out the objectives and proposals required to achieve the vision; and
 - looking at next steps toward a final version of the strategy in summer 2010.

The bulk of the strategy is focused on the five objectives the Mayor has identified as being key to his vision of a successful economic capital. These are:

1. To promote London as a city that excels as a world capital of business
2. To ensure that London has the most competitive business environment in the world
3. To drive London's transition to a low carbon economy and to maximise the economic opportunities this will create
4. To give all Londoners the opportunity to take part in London's economic success, access sustainable employment and progress in their career
5. To maximise the benefits to London from investment to support growth and regeneration, and from the 2012 Olympic and Paralympic Games and its legacy

- 4.6 Each objective is further underpinned by a number of proposals setting out how the Mayor will achieve the objectives and with which key partners he will need to work with in order to do so. Similar to comments on the Transportation Strategy, the EDS being a London wide strategy has proposals that are often very general and broad, making it difficult to assess their possible impact in Brent.

- 4.7 Overall there are no concerns with the aim of the strategy nor the five objectives identified as being those to take forward. However, there is a

lack of detail on how much will be invested in achieving the range of proposals, together with a lack of clarity on what the role of local authorities will be. Without the LDA's Investment Strategy to refer and cross reference (this was available at the time of review) it is not possible to grasp the scale or priority of activities to be supported in London and even more difficult to narrow this down to Brent.

- 4.8 A response to the consultation will be submitted by London Councils and West London Alliance. It has been decided that Brent will not draft a separate formal response to the consultation. Having contributed and viewed both responses we are happy that these iterate our concern regarding a more detailed implementation plan/action plan to follow this strategy so that the proposals are more tangible and that investment better articulated.

Please refer to Appendix B and C the London Councils and West London Alliance draft responses to the DS consultation.

5.0 Financial Implications

- 5.1 The Replacement London Plan fails to identify resources for some of the policies e.g. 20 additional Gypsy and Travellers pitches and also for those that are a consequence of population growth, e.g. primary school provision. Given the likelihood of difficult local authority financial settlements in the next few financial years, this will put the deliverability of the Plan in jeopardy. Of equal concern are the Mayor of London's proposed policy changes that could divert S106 contributions from local infrastructure into strategic transport and other strategic matters. Although much would depend on the scope and nature of the S106 demands and what is included in the Community Infrastructure Levy, it is important that local needs are given the necessary priority.

6.0 Legal Implications

- 6.1 The Mayor is required to prepare a spatial strategy (the London Plan) and keep it under review. The process for drawing up and altering the London Plan are set out in the Greater London Authority Act 1999 and Circular 1/2008. Borough Core Strategies and other Development Plan Documents have to be in general conformity with the London Plan.

7.0 Diversity Implications

- 7.1 One of the key objectives both the London Plan and the Mayor's Transport Strategy is to ensure that London is a city of diverse, strong, secure and accessible neighbourhoods.

8.0 Staffing/Accommodation Implications (if appropriate)

- 8.1 There are no staffing or accommodation implications arising directly from this report.

9.0 Environmental Implications

- 9.1 The London Plan and Mayor's Transport Strategy both support improved environmental standards, proposes policies that reduce CO2 emissions and development that adapts to climate change.

10.0 Background Papers

- 10.1 London Borough of Brent LDF - Site Specific Allocations Proposed Submission DPD, June 2009
- 10.2 Proposed Replacement London Plan –Draft for Public Consultation 2009
- 10.3 Mayor’s transport Strategy – Public Draft (October 2009)
- 10.4 Report to London Council’s Leader’s Committee (item11), 8th December 2009.
- 10.5 West London Partnership – 10 point transport plan (2007).

Contact Officers

Any person wishing to inspect the above papers should contact Dave Carroll, Planning Service 0208 937 5202 or Tim Jackson, Transportation Service 0208 937 5151.

Richard Saunders
Director of Environment and Culture

Appendix "A"

London Councils' response to the public consultation on the Draft Mayor's Transport Strategy

Dear

London Councils' response on the Draft Mayor's Transport Strategy

London Councils welcomes this opportunity to provide further views and comments on the revised Mayor's Transport Strategy (MTS). We are pleased to see that many of the issues we raised in response to the consultation on the Statement of Intent in July 2009 have now been addressed and there is much in the draft MTS that we welcome.

The paper attached sets out our detailed response on the issues that we feel have not yet been fully addressed in the draft Strategy and the areas where we would like to see changes in the final strategy. These are summarised below but first I would like to highlight the aspects of the draft strategy that we particularly welcome.

London Councils welcomes the following areas of the draft MTS:

- The inclusion of an Implementation Plan which sets out clearly which schemes are funded and which are in development stages.
- The commitment to promote walking, cycling and the use of public transport and the aim to increase the mode share of these journeys.
- The proposals relating to cycling including those on 'biking boroughs', cycle training, raising awareness and cycle parking.
- The proposals on walking including those relating to better journey information and the Key Walking Route approach.
- The move away from a focus on a few 'strategic centres' and to instead base future growth around existing town centres and to improve transport connectivity into and between those centres.
- The proposals for reducing carbon emissions.
- The commitment to continue opposing any further increases in capacity at Heathrow
- The proposals to improve interchange and integration between modes
- The Mayor's desire to see TfL given greater influence over National Rail services in London and to have greater influence in franchise specification.
- The Mayor's intention to ensure that the requirements for LIPs are kept to a minimum.

The areas where London Councils would like to see changes in the final strategy include:

- **Integration with the London Plan, EDS and other policy areas** – the MTS should say more about how changes in other policy areas will be taken into account. The transport investments in the MTS need to be brought together with relevant proposals in the London Plan and EDS.
- **Integration with other strategies outside London** – there needs to be clearer information about how the Strategy will link to relevant strategies outside London. The MTS should set out exactly what the Inter-Regional Forum's role should be in relation to transport.
- **The needs of local vs, long distance transport** – the MTS needs to set out how the need for local transport services will be balanced with the needs of long distance commuting.
- **Clarity about what is achievable and deliverable within the timescale of the MTS** – we are concerned that no timescale is given for the review of the Crossrail 2 (Chelsea Hackney) route.
- **Encouraging modal shift** – the strategy should say more about how cycling measures will be developed in Outer London and should contain a sustainable hierarchy of transport modes.
- **Encouraging polycentric development** – we are concerned that the emphasis on improving orbital links is primarily on better information and integration between modes rather than new infrastructure.
- **Reviewing bus route planning** – the strategy should include a wide ranging review which focuses on how the bus network operates strategically rather than on a route by route basis or focusing on the contractual arrangements.
- **Future developments on road pricing** – we would like clarity on the Mayor's position on road pricing and a commitment to reviewing the existing payment collection methods.
- **Addressing the impacts of climate change** – we believe that the MTS should include interim targets to allow progress towards the 60 per cent reduction by 2025 to be judged.
- **Improving Air Quality** – we would like the MTS to indicate what the Mayor's contingency plan is if the government fails to obtain extensions for achieving the NO2 and PM10 European targets.
- **Airport Capacity** – we have some concerns about the Mayor's approach to airport capacity and would like to see the adoption of a 'plan, monitor and manage' approach.
- **Transport opportunities for all** – greater consideration needs to be given to the affordability of public transport and we are concerned that this has been removed as a key outcome since the SoI was published.

- **Requirements for boroughs** – we are concerned about the Mayor's intention to keep the requirements for LIPs to a minimum will be delivered in practice and that the MTS has introduced new requirements for boroughs (e.g. planting trees) without any additional funding.

London Councils has welcomed TfL and GLA's willingness to engage with our Members in the development of the new Transport Strategy and looks forward to continued close working over the coming months to ensure that the issues we have raised here are addressed in the revised Mayor's Transport Strategy.

Yours sincerely

Cllr Mike Fisher
Chairman

London Councils' response to the public consultation on the Draft Mayor's Transport Strategy

Introduction

1. London Councils has worked closely with TfL and the GLA in the development of the new Transport Strategy and is grateful for their willingness to engage with our Members and borough officers. We are pleased that many of the issues we have raised in the course of our work on the MTS over the last two years have been addressed.
2. We welcome the opportunity to provide further views and comments on the Public Draft of the Mayor's Transport Strategy (MTS). In preparing our response to this consultation we have continued to focus on those issues that we highlighted in response to previous consultations, particularly that on the Statement of Intent (SoI) in July 2009. This response sets out those issues that we continue to feel have not yet been fully addressed in the draft Strategy and we have chosen not to answer the specific consultation questions directly.
3. The current review in parallel of the MTS, London Plan and Economic Development Strategy (EDS) provide an important opportunity to deliver a clear programme for the future of transport in London within the context of an overarching spatial strategy which sets out clearly the locations for particular types of development in London and the transport investment needed to support that development. It is essential that boroughs are involved in shaping all these strategies and we have taken this opportunity to consider all three strategies together.
4. One overarching concern we have is the assumption that London's economy will continue to grow in the longer term that underpins all three strategies. There is no consideration of alternative scenarios or of the impact of different rates of growth. The MTS should consider the impacts of slower growth rates on the demand for transport and the wider consequences of alternative patterns of growth. Given the current uncertainty about the length and depth of the current recession, London Councils would like the Mayor to test alternative economic and employment growth scenarios in terms of the transport implications for different parts of London. For example, taking account of different projected export performance, different levels of recovery in consumer spending levels, different levels of public spending reductions etc.
5. Our specific comments on the MTS are set out below.

Integration with the London Plan, EDS and other policy areas

Executive 18 th January 2010	Version No.4.0 17 th December 2009
--------------------------------------------	--------------------------------------------------

6. Whilst we recognise that it is not possible for the draft strategy to anticipate all the developments in other policy areas over the period of the plan we believe that it should say more about how changes in other policy areas will be taken into account. For example, the implementation plan in Chapter seven does not say anything about engagement with other policy areas. In addition, the link between investment in transport infrastructure and areas of economic growth is not always clear, particularly as there is little spatially specific detail in the EDS.
7. The transport investments proposed in the MTS need to be brought together with the strategic Opportunity Areas and Growth Corridors in the London Plan and the schedule of infrastructure projects that will direct LDA and other public investments. This would provide clear links between the three strategies and acknowledge the key role that transport investment plays in increasing economic potential and bringing forward investment. It would also provide a framework for a discussion about the priority areas for investment across London, and the contribution of different agencies, including the boroughs, in delivering this.
8. The London Plan, and policies in the MTS, identify Metropolitan centres as key growth areas and Proposal 5A in the EDS refers to 'removing barriers to outer London fulfilling its potential'. However, the proposals in the MTS do not provide certainty that the transport infrastructure and services will be delivered to support this. For example, the MTS policies are likely to lead to an increase in bus fares and a reduction in the total mileage of bus routes (as set out in the TfL Business Plan 2009/10-2017/18). As many parts of Outer London rely heavily on bus improvements to facilitate improved access to its town centres for local people, these proposals are inconsistent with the objectives of the EDS and London Plan.
9. In addition, the policy with regard to land safeguarded for transport use in the MTS should be consistent with that given in the London Plan. The London Plan refers to safeguarding land that already has a transport function or that will have committed transport developments. The MTS goes further and includes land that is well located to the transport network and could offer potential transport functions. We suggest that the London Plan definition be adopted in both documents.

Integration with other strategies outside London

10. We also believe that there needs to be clearer information about how the Strategy will link to relevant strategies outside London and greater

consideration of transport links to key population centres outside London. The Mayor should work with relevant boroughs to ensure that the transport strategies of areas surrounding London are aligned with London's goals, and should aim to address shared challenges.

11. There is reference to TfL's ongoing discussions with SEERA and EEDA via the Inter-Regional Forum but we believe that it would be helpful to give a stronger role to the Inter-Regional Forum (and will propose this in our response to the London Plan) and that the MTS should set out exactly what the Inter-Regional Forum's role should be in relation to transport.

The needs of local vs. long distance transport

12. We support investment that makes local journeys easier and which encourage Londoners to make more sustainable travel choices. However, we also recognise that national rail plays an important part and that London's travel needs do not stop at its borders. Ensuring that the heart of Britain's economic engine is connected properly and effectively with the region and the rest of the country is essential and we welcome such investment as is necessary to maintain this.
13. We also recognise that the detail on local services is not for the MTS and believe that boroughs are best left to determine this detail for themselves. However, the MTS needs to provide the framework in which this can happen as transport services which provide for long distance commuting do not always meet the needs of London's residents and businesses. In particular, the MTS needs to set out how the need for local transport services will be balanced with the needs of long distance commuting, for example, how will the needs of local passengers be taken into account in the development of proposals in support of high speed rail. We believe that Policy 2 should be amended to include a requirement to consider the impact on local services when introducing new services for long distance travel.
14. London Councils has previously suggested that major strategic transport projects in London should be controlled by TfL given their over-arching strategic responsibility for transport in London and we support the Mayor's desire for TfL to have greater control over rail in London even where it does not actually manage the rail network. We wish to see TfL use this greater control to ensure that the needs of local journeys are prioritised.
15. Maintenance is another crucial issue in providing for the needs of local travellers, particularly those on foot or by bike. Whilst the draft MTS is not the place to provide detail on the funding available for

maintenance, there are a number of proposals which relate to this. Unfortunately none of these say anything explicitly about the maintenance of footways and cycleways. For example, proposal 35 which sets out a commitment to maintain the network assets refers only to the road network and proposals 82,83 and 84 which relate to achieving 'better streets' do not mention maintenance. We believe that one of these proposals should be amended to ensure that adequate funding is available for the maintenance of footways and cycle routes.

Clarity about what is achievable and deliverable within the timescale of the MTS

16. We are pleased to see that the draft Strategy includes an Implementation Plan which sets out clearly which schemes are funded and which are in development stages. We also note that the draft Strategy contains greater detail on how funding will be sought and secured. However, we have some concerns about policy 32 regarding funding for buses (this is discussed further under transport opportunities for all below).

17. We are also pleased that the draft Strategy provides further information on TfL's priorities for further capacity beyond the schemes that are already committed. We note that Proposal 9 states that the Mayor will undertake a review of the Crossrail 2 (Chelsea Hackney) route to ensure it is providing the maximum benefits and value for money. However we are concerned that no timescale is provided for this. We believe that this review should be time and scope limited to ensure that TfL is in a position to lobby Government for funding for this, in time for spending decisions on Network Rail's next control period (2014-2019), and to ensure a unified and comprehensive London-wide lobbying position..

Encouraging modal shift

18. In our response to the SoI we called for greater emphasis on policies which encourage local journeys to be made on foot or by bicycle, including in Outer London. We are pleased to see that the draft MTS sets out a commitment to promote walking, cycling and the use of public transport and aims to increase the mode share of these journeys. We welcome the proposals relating to cycling including those on 'Biking boroughs', cycle training, raising awareness and cycle parking.

19. We also welcome the proposals on walking including those relating to better journey information and the completion of seven Strategic Walking Network Routes. We are particularly pleased to see the proposal relating to the Key Walking Route approach as this is something we called for in 'Breaking down the barriers to walking in London' which we published jointly with Living Streets and Walk

London last year. However, we are still concerned that many of the proposals for encouraging cycling, such as cycle highways and the cycle hire scheme have focused on Central and Inner London boroughs. We believe there is scope to develop such measures in Outer London too and that the strategy should say more about how this will be achieved.

20. In our response to the SoI we also said we would like to see a thorough review of the approach to 'road safety' and 'traffic calming' schemes, so that they are also evaluated in terms of their contribution to sustainable transport and environmental objectives. We continue to support the need for such a review and would also like to see boroughs given greater influence over speed limits on the TLRN in their area to ensure that they are able to address road safety effectively.

21. We note that the draft MTS does not advocate a road user hierarchy. We continue to believe that the transport strategy must encourage people to make smarter travel choices following a sustainable hierarchy of transport modes: putting walking above cycling, cycling above public transport and public transport above the private car. Without such a hierarchy, the many other aspirations in the strategy, which we welcome, will not come to fruition. We would encourage the Mayor to introduce policies that go beyond simply leaving it to people's individual choices and to set out a policy framework that actively discourages less sustainable modes of transport. We recognise however that, particularly in parts of Outer London, this will require transport investment to ensure a viable alternative to the private car exists and the Mayor should work with boroughs to ensure that this takes places.

22. We also note that there is still no reference to a London Walking Plan which we believe should be a key priority. This should not be a prescriptive plan but is a way of formalising the Mayor's support for walking whilst still giving boroughs the local flexibility needed to achieve improvements in walking.

23. In our response to the SoI we said that we would like to see a greater role for car clubs in the Strategy as we believe they have a key role to play in encouraging modal shift. We are pleased to see that there is now a proposal to promote the use of car clubs.

Encouraging polycentric development

24. We note that the Mayor has accepted the Outer London Commission's recommendations that future growth should be based around existing town centres and that the transport focus should be on improving connectivity into and between these centres. We welcome this move away from a focus on a few 'strategic centres' and believe that the MTS

should support transport which recognises and values the needs of Outer London and encourages polycentric development around existing town centres across London.

25. We also note that there are a number of policies and proposals to support the Central Activities Zone. However, although Inner London should benefit from many of the broader proposals as well as projects such as Crossrail and further potential schemes such as Tube extensions and rail improvements, there are no measures specifically aimed at addressing radial capacity in and through Inner London and we would not wish to see the focus on Outer London come at the expense of Inner or Central London.
26. We support the proposals in the MTS to improve orbital links between town centres but we are concerned that the emphasis is primarily on better journey planner information and improved integration between transport modes rather than new infrastructure or services. We believe that improved high quality bus links should be provided where it is not possible to provide rail links. This should include limited stop 'express buses' for journeys that can not easily be made by rail.
27. We do not believe that the Mayor has given adequate consideration to the need for new infrastructure particularly if planning for the levels of growth that the Strategy is based on. We would like to draw attention again to the statement in our response to the SoI that decisions on investment in transport infrastructure should reflect the parts of London where significant population and employment increases will take place. Additionally, investment in transport will also be required elsewhere to encourage modal shift and to address areas of transport deficit, and areas of social deprivation more generally.

Reviewing bus route planning

28. Proposal 23 states that the bus network will be kept under regular review, and that potential changes would be subject to cost benefit analysis. London Councils has been calling for an extensive review of bus route planning to ensure that it meets the needs of Londoners and visitors to London in the 21st century by making the system more logical and easier to understand and use. We believe this review should focus on how the bus network operates strategically rather than on a route by route basis or focusing on the contractual arrangements. The review should also look at the types of vehicle used, and whether there is scope to use smaller vehicles on quieter routes or at quieter times of day and at ticketing flexibility, including learning from good practice on this issue elsewhere. It is not clear that the review referred to in Proposal 23 will address these issues and we would like to see this

proposal amended to refer to a much wider ranging review which London Councils and the boroughs would be involved in the development of.

Future developments on road pricing

29. We note that the Mayor ruled out any extension to road pricing when speaking to the London Assembly on 14 October 2009, stating that he had 'every intention of not extending congestion charging in London'¹. However, in a letter sent to London Councils' Chairman, Cllr Merrick Cockell on 12 October 2009 the Mayor says that there could be a role for road pricing in London if this is considered necessary to meet the objectives of the strategy, e.g. in meeting environmental objectives, but any scheme would need to take account of local conditions, and be fair and flexible. We would therefore like clarity on the Mayor's position on road pricing and a clearer framework in the MTS as to how those boroughs who wish to, could develop their own road pricing schemes. This is particularly important given that recent changes in legislation give boroughs greater scope to introduce their own charging schemes but they would still require confirmation from the Mayor before doing so.

30. We would also like to see a commitment in the strategy to reviewing the existing payment collection methods for the congestion charging scheme to ensure the scheme is not heavily geared to securing revenue from fines, or making it unnecessarily difficult to pay.

Addressing the impacts of climate change

31. We welcome the proposals set out in the draft strategy for reducing carbon emissions (95-108) and Policy 24 which states that the Mayor will take the necessary steps to achieve the required contribution from ground based transport to achieve a 60 per cent reduction in London's CO₂ emissions by 2025 from a 1990 base.

32. We note that although CO₂ emissions will be reported annually in the Travel in London report it is still not clear what criteria or timescales the Mayor will use to determine whether his current policy approach to achieving reductions in CO₂ emissions is working. For example, it is not clear at what point the Mayor would decide that more direct intervention is required to reduce emissions in the Capital. We believe that the MTS should include interim targets to allow progress towards the 60 per cent reduction by 2025 to be judged and ensure that further interventions are introduced in sufficient time to allow this target to be met. We also believe the Mayor should set explicit targets for reducing

bus and taxi emissions (proposal 91) and we recommend that the development of low emission taxis be treated as a priority (proposal 26).

Improving Air Quality

33. We note that the draft strategy sets out a number of measures to improve air quality including behavioural change, reducing emissions from public and private fleets and tackling air quality 'hotspots' as well as further use of the Low Emission Zone. We will comment further on these in our response to the Air Quality Strategy. However, we are concerned about proposal 92 which includes the incentivising of low emission vehicles through pressing for changes to parking regulations. We believe firmly that it should be for individual boroughs to decide the levels of parking charge in their area. We would also like the MTS to indicate what the Mayor's contingency plan is if the government fails to obtain extensions for achieving the NO₂ and PM₁₀ European targets.
34. We continue to support the promotion of electric vehicles in principle and note that the draft strategy contains a number of measures to incentivise them. However, we are concerned that there are no specific proposals to ensure that electric vehicles do not add to parking stress and congestion and do not detract from walking and cycling. The Mayor must continue to work with boroughs on this.

Airport Capacity

35. We welcome the Mayor's commitment to continue opposing any further increases in capacity at Heathrow but would like to raise some concerns about the Mayor's approach to airport capacity as set out in proposal 47. London Councils strongly opposes any further expansion of Heathrow Airport, as we believe it will have significant impacts, particularly on air quality and noise pollution, for the capital's residents.
36. London Councils also accepts that there may be a need to provide further runway capacity in the South East, but opposes the use of a 'predict and provide' policy to airport development. In no other form of transport is it accepted that we should pay for and provide for all forecast growth and it is not clear why air transport should be treated differently. London Councils would like to see the adoption of a 'time phased' approach to development through a "plan, monitor and manage" approach, which, supported by continuous monitoring of the industry, would reveal what further provision was needed. This should be carried out before decisions are made regarding what level of additional airport capacity is required.

37. In addition, London Councils supports looking at alternative ways of managing or even reducing the demand for air travel by innovations in high speed rail links, the level of aviation fuel tax, as well as at other alternatives to expansion at Heathrow, including better use of London's other airports and the rest of the UK's regional airports.

Transport opportunities for all

38. We note that the strategy contains proposals to improve the physical accessibility of the transport network and that improvements will be targeted at strategic locations such as town centres and around accessible stations. We support this approach but believe that the Mayor should work with the boroughs to identify the places most in need of accessibility improvements. We continue to believe that there is room to consider greater flexibility in the standards relating to accessibility and would like to see this issue addressed in the MTS.

39. London Councils continues to believe that greater consideration needs to be given to the affordability of public transport in order to ensure that all Londoners can benefit from it. In this respect, we have some concerns about policy 32 and Proposal 119 which suggest that bus fares may be increased in order to reduce the level of bus subsidy and ensure that fares provide an appropriate level of contribution to the cost of providing public transport. We recognise that decisions on bus and tube fares are for the Mayor but we would like to see a clear indication in the MTS of what the Mayor's pricing strategy will be going forward, given that the TfL business plan has now been published. We would encourage the Mayor to approach this subject with sensitivity, seeking to avoid disproportionate price hikes which will impact most on the poorest people in London or those who rely most on public transport. We are concerned that 'ensuring the affordability of public transport fares' has been removed as a key outcome since the SoI was published in May 2009.

40. We note that the Mayor proposes to keep the range of concessions available under review to ensure that they are available to those who most need them. We believe that the concessions available to young people in full time education should be extended to those on apprenticeship schemes. At the moment many of the 16,000 apprentices in London pay full adult fares as they do not officially meet the eligibility criteria for student Oyster cards which would entitle them to concessionary travel. This means that many are spending a significant proportion of their income on travel (most apprentices in the private sector earn only £95-£110 per week). We believe that a minor amendment to the eligibility criteria should be made to allow this group of young people to access the same benefits as those in full-time

education. This would be in line with both the Mayor's and the boroughs' support for apprenticeships.

Integration between modes

41. We welcome the proposals in the draft MTS to improve interchange and integration between modes and the specific measures set out to achieve this. We are also pleased to see that the Sub-Regional Transport Plans will build on this to identify particular improvements with input from London boroughs.

42. As already set out above we support the Mayor's desire to see TfL given greater influence over National Rail services in London and believe that particular emphasis should be placed on integrating the rail network into the rest of London's transport system. We are also pleased to see that the Mayor is seeking to have greater influence in franchise specification in order to improve capacity, service levels and integration of National Rail Services with TfL Services and to create a common set of travel products.

Requirements for boroughs

43. We welcome the Mayor's intention as set out in policy 29 to ensure that the requirements for Local Implementation Plans (LIPs) demonstrate consistency with the policies and proposals set out in the MTS and that other legal requirements are kept to a minimum. However we are concerned about how this will be delivered in practice given the prescriptive nature of the draft LIPs guidance produced by TfL.

44. We are also concerned that the MTS has introduced new requirements for boroughs (e.g. electric vehicle charging points, road works permit system, Community Safety Partnerships, planting trees etc), yet additional funding has not been provided to support the implementation of these proposals. Where relevant, e.g. for street trees, funding will also be required to cover the cost of ongoing maintenance not just the initial installation.

45. In conclusion, London Councils looks forward to working with TfL and the GLA over the coming months to ensure that the issues we have raised here are addressed in the revised Mayor's Transport Strategy.

DRAFT LONDON COUNCILS RESPONSE TO 'RISING TO THE CHALLENGE: THE MAYOR'S ECONOMIC DEVELOPMENT STRATEGY FOR GREATER LONDON – PUBLIC CONSULTATION DRAFT'

London Councils welcomes the opportunity to respond to 'Rising to the challenge: The Mayor's Economic Development Strategy for Greater London - Public Consultation Draft'. London Councils represents the 32 London boroughs and the City of London Corporation. London Councils delivers influence, improvement and excellent direct services for Londoners.

Mayor's vision and objectives

London Councils supports the Mayor's vision statement for London that cuts across all his strategies, plans and actions:

'Over the years to 2031 and beyond, London should excel among global cities, expanding opportunities for all its people and enterprises, **achieving the highest environmental standards and quality of life, and leading the world** in its approach to tackling the urban challenges of the 21st century, particularly that of climate change (pg 13).

London Councils also supports the five specific objectives within the draft Economic Development Strategy (EDS).

London Councils recognises that the Mayor's Economic Development Strategy is a strategic document. However, the implementation plan – the main way that the Mayor will achieve his vision for London and his specific economic objectives – could be strengthened in order to make the vision clearer and more tangible to delivery partners.

London Councils would like to see some key outcomes within the implementation plan that will measure progress towards the Mayor's vision for London's economy, based on the economic and population assumptions that underpin the strategy. For example, by how much should international visitor spending have increased in five-ten years time; by what extent should the economic growth rate in outer London have increased by if the strategy is fully successful?

London Councils expects to see more output and detailed actions around the draft EDS proposals contained in the LDA's Investment Strategy.

Economic analysis

London has a strong and resilient economy and the analysis of London's current and future economic performance is extremely positive. London Councils agrees that London has a sound economic base that to date

appears to have been less negatively affected than other UK cities by the current recession.

However, this should not lead to complacency. On some economic indicators London performs less well than expected. For example, on the Huggins/Cardiff Global Knowledge Economy Competitiveness Index, London was ranked only 102nd in 2008. It was ranked less competitive in this respect than the South East and Eastern regions of the UK. Its ranking had also fallen from 56th in 2005.

The analysis should also acknowledge that parts of outer London's economy have not fulfilled their growth potential in the past, as highlighted in the final findings of the Outer London Commission² and acknowledged in other parts of the draft strategy.

The forecast economic and employment growth in London that underpin the strategy show London experiencing a cyclical recovery after the current recession, followed by longer term positive growth. Employment projections from three other different forecasting companies are considered. Given the continued uncertainty about the length and depth of the current recession, London Councils would like to see the Mayor consider economic and employment growth under different growth scenarios – for example, taking account of different projected export performance, different levels of recovery in consumer spending levels, different levels of public expenditure reductions etc. Other cities, for example, are planning for higher and lower overall growth scenarios³. London should do the same.

The Mayor should continue to monitor London's economy closely through the recession and over the lifetime of the strategy on a regional basis but also at a sub-regional and borough level. London boroughs now have a statutory duty to produce Local Economic Assessment from March 2010 onwards⁴. Sub-regional economic assessments are also being prepared in some parts of London. These assessments should form part of a formal mechanism of reviewing the evidence base for the Mayor's strategies. They will provide an effective way of capturing the diversity of economic performance across London. London Councils can work with the LDA and the boroughs to facilitate this.

Geography of investment and current and future infrastructure projects

In our response to the initial consultation document on the EDS, London Councils argued that the final EDS needs to be clear about priority areas for investment across London over the short and medium term – to better align public funding from a range of agencies, given the expected reduction in public spending in the short and medium term and to give confidence to private sector investors. Our response also pointed out that the strategy should better reflect London's economic and social diversity.

² Mayor's Outer London Commission, *Interim Conclusions*, 7 July 2009

³ Core Cities, *Enabling Sustainable Economic Growth: Interim report*, 2009

⁴ And are expected to complete their initial assessments within 6-9 months of this date

The draft EDS better reflects London's economic diversity. London Councils is also aware of work within the LDA to better understand the location of its current investments and the economic geography and priorities of London boroughs, with a view to aligning funding. These are encouraging developments.

However, whilst the draft London Plan, Transport Strategy and EDS each provide a partial picture of strategic developments across London, it is difficult to piece these together. The detailed planned transport investments proposed in the Mayor's Transport Strategy and the strategic Opportunity Areas and Growth Corridors within the London Plan need to be brought together to give a schedule of infrastructure projects that will direct LDA and other public investments. This could then frame a discussion about priority areas for investment across London and the contribution of the different agencies, including London boroughs. This would also provide clear linkages between the strategies – transport investment can be vital in increasing economic potential and bringing forward regeneration.

Chapter 1 – London: world capital of business

London Councils supports the proposals in this chapter, particularly around strengthened and more co-ordinated promotion of London between key agencies. This is a key strategic role for the Mayor and capitalising on the promotional opportunities afforded by the 2012 Olympic and Paralympic Games.

Promoting London as a global city with its clusters of world-beating businesses will inevitably lead to a focus on the Central Activities Zone. However, the promotion of London should include all relevant parts of London. For example, promotion around higher education, as leading HE institutes are located across the capital.

Promotional agencies should be encouraged to work closely with boroughs and sub-regional partnerships, so that they are aware of opportunities across the whole of London.

There should be close links between promotional work and other actions in the draft EDS – for example, links with the plans for large scale development in the London Plan Opportunity Areas (Proposal 5D) and with encouraging collaboration between business and academia (Proposal 2A).

Chapter 2 – Improving London's competitiveness

London Councils welcomes the emphasis on developing London's capacity for innovation by encouraging collaboration and promoting more productive links between business and academia. It would be useful to know some more detail of the type of support that the Mayor will provide in this way and the scale of investment returns that the Mayor will seek through his support.

The strategy acknowledges the vital contribution that SMEs, mirco-businesses and the self-employed make to London's economy, alongside large employers. The proposal in the draft strategy that public sector support should

complement support provided by the private sector and focus on businesses and individuals that do not have ready access to private sector support is also welcome. Currently some BME groups, disabled people and women are under-represented in terms of owning and starting businesses in London and the strategy should recognise this and focus some of its resources on these more disadvantaged groups.

The Mayor and LDA should make it clear what supporting pre-start and small/early stage businesses 'in a low cost way' means in terms of spend and the type of programmes available. London Councils would be concerned if spend on pre-start and start-up businesses is significantly reduced or support is limited only to accessing information via the Internet.

The strategy rightly highlights the introduction of the 'Solutions for Business' package. The LDA has been working with London Councils and London boroughs on the introduction of the 'Solutions for Business' package. This dialogue needs to continue to inform the LDA's decisions about the 'Solutions for Business' package that will be on offer in London. London boroughs support some aspects of the 'Solutions for Business' package – but that support is non-statutory and not always available in every borough. London boroughs, via London Councils, should have an early opportunity to discuss the LDA's proposals for the 'Solutions for Business' offer in London. This would ensure that local and regional funding and activity are aligned and do not result in significant gaps in provision. London boroughs, through London Councils, should also be involved in formal dialogue on the specification for the next Business Link contract, as this will have a significant impact on the focus of business support services in London.

Other areas for joint work between the Mayor, London Councils and London boroughs include:

- Lobbying to ensure that London remains an open and competitive business-friendly environment. London Councils and the Mayor should collaborate where possible on lobbying on these issues, to strengthen London's voice;
- Working with neighbouring regions to achieve mutual economic benefits – the Mayor and LDA should ensure that discussions around key strategic regeneration and opportunity areas include London boroughs already in working together sub-regional groups on developing these sites and drawing in other regions e.g. the London-Stansted-Cambridge-Peterborough Growth Area. If the current mechanism of working with other regions, the Inter-Regional Planning Forum is to be the main focus of dialogue with the surrounding regions, its purpose and role need to be reviewed and strengthened;
- Improving the quality of life in London. London Councils welcomes the recognition in the draft EDS that quality of life affects London's competitiveness. Aligning activity and investment with London boroughs to improve the quality of the environment, the health of Londoners, promoting culture and sport and reducing crime will be vital when public spending is tight. London boroughs have statutory duties in many of these areas and are big spenders on these services in London – for example, spending £50

million on community safety⁵ and £1½ billion on cultural and leisure activities⁶. Consequently, the Mayor's activities in these areas should be strategic ones.

Chapter 3 – Transforming to a low carbon economy

London Councils supports the measures outlined to ensure London's economy becomes a low-carbon economy and establishes itself as a low-carbon world leader.

London Councils is keen to continue collaborative working on the low carbon skills agenda between the GLA/LDA and London Councils/boroughs that takes previous work forward and builds on intentions outlined in the City Charter. Some of these initiatives are highlighted in the draft strategy, such as the Building Energy Efficiency Programme (BEEP) and work to support skills development to support a low carbon economy.

Other initiatives highlighted in the strategy where collaboration between London Councils, London boroughs and the Mayor is important include:

- The Mayor's Low Carbon Taskforce – London Councils would want to be represented on this taskforce;
- The development of 10 Low Carbon Zones in London – boroughs will be important partners in the Zones, given their community leadership role. London Councils is keen to explore with the LDA and the Mayor how low carbon businesses and infrastructure will be geographically spread across London;
- The establishment of new financing structures that are self-sustaining and can lever in private sector funding. Securing sufficient investment to transform to a low carbon economy will be particularly challenging in the short and medium term where public finances will be limited. Developing new innovative financing models will be crucial and should be a shared endeavour.

Chapter 4 – Extending opportunities to all Londoners

London Councils supports much of the analysis and most of the proposals to extend opportunities to all Londoners. The analysis of London's worklessness problems in the document is an accurate and comprehensive one, as is the lack of progress made in significantly reducing levels of worklessness in London and the need for new energy and ideas. The scale of child poverty, and its causes, is also accurately described in the draft EDS and London Councils welcomes specific proposals to reduce child poverty in London.

Giving children the best start in life and a good education is extremely important to ensure that Londoners can thrive and take advantage of the economic opportunities in the city. However, each agency needs to consider whether they are best placed to deliver initiatives. London boroughs are responsible for education – soon up to the age of 19. London Councils does

⁵ Based on London Councils survey, 2009

⁶ CIPFA General Statistics 08/09

not support the Mayor's proposals to become involved in the delivery of education and establish up to 10 School Academies. London Councils suggests that the Mayor focuses resources on establishing more vocational training opportunities for young people, using existing delivery agencies rather than establishing new institutions. The latter will only add to the complex delivery landscape described in the draft EDS.

London Councils particularly welcomes the emphasis in the strategy on increasing part-time work in London, getting workless people into sustainable jobs and supporting them to progress in their jobs, the importance of meeting business needs, the need for personalisation of provision for the long-term unemployed and greater co-commissioning. London Councils is working with the LSEB to better integrate the important work of boroughs around workless, given that they:

- Deliver and commission their own employment and skills services as well as other support services that are crucial in making a transition from welfare to work successful and provide access points to employment and skills services, such as provision of childcare, social housing, administration of housing and council tax benefit;
- Lead and co-ordinate the work of all local agencies, including PCTs and business, through Local Strategic Partnerships;
- Have well-established links with employers – they are large employers in their own right⁷ and have good links with small and large local employers⁸;
- Have a strong track record in working with the people with multiple barriers to work.

London Councils also recognises the need for greater flexibility for London within a nationally driven employment and skills system to meet its particular needs. A new approach to employment and skills provision is needed that gives flexibility at the regional level but also allows flexible delivery at the local and sub-regional level too, with a borough (or groups of boroughs) having a significant input into employment and skills services designed for their communities. London Councils is keen to work with the Mayor and the LSEB to explore how this new way of working could be achieved.

Proposal 4D states that training and employability support will focus on neighbourhoods with high concentrations of worklessness. London Councils would like the EDS to be clear on how these neighbourhoods will be identified and whether these neighbourhoods are to be the focus of LDA funded support. London boroughs should be consulted with early in the process to determine which neighbourhoods will qualify, given their role as community leaders. London Councils would like to see an approach to improving mainstream employment and skills services across the whole of London, as well as additional support around key infrastructure projects that create large scale job opportunities.

⁷ London boroughs collectively employ just over 250,000 people

⁸ For example, the Greenwich Local Labour and Business (GLLaB) scheme that through Section 106 commits employers, development and their contracts to use GLLaB services as a single point of access for local recruitment and employer engagement.

The proposals and analysis of worklessness and deprivation in London do not include the following:

- How activities in London focused on the recession and tackling the significant increase in unemployment levels in the city will continue – given that GLA Economics forecasts that employment levels in London may not reach 2006 levels again until 2018;
- Enterprise can be an important route out of unemployment for some people and this should be reflected in the EDS. The proposals in Chapter 2 to promote enterprise and entrepreneurship should be integrated into the LSEB's activities around worklessness.

The Mayor also needs to ensure that policies in other strategies do not undermine aims and objectives within another. For example, London Councils is keen that the Mayor's commitment to reducing the bus subsidy does not result in disproportionate fare increases that would significantly affect disadvantaged Londoners and could undermine work to increase employment among disadvantaged groups.

Chapter 5 – Investing in London's future

London Councils supports the key proposals in this part of the draft EDS to sustain investment levels in London and ensure that the maximum economic opportunities are gained from key investments.

For the final EDS, London Councils would like to see:

- A wider range of activities for strengthening the economic performance of outer London. London Councils welcomes the focus of town centres, but this cannot be the sole focus of support. The current EDS also highlights only public sector based activities as potential growth sectors for outer London – higher and further education and central government. Private sector growth should also be encouraged. Likewise, transport infrastructure will be very important in unlocking potential development sites. Yet the transport improvements for outer London in the EDS are confined to 'making fullest use of existing public transport and ... selective local improvements', along with facilitating orbital movements.
- Explicit links between the development of Opportunity Areas and tackling deprivation in regeneration areas, in order to ensure disadvantaged Londoners benefit from strategic regeneration schemes;
- A commitment that skills and employment activities outlined in Chapter 5 will be linked to infrastructure and development schemes, where appropriate;
- Clearer and more detailed proposals around the legacy of the 2012 Olympic and Paralympic Games and where legacy facilities and activities will be of benefit pan-London or mainly to East London;
- Clearer information on the focus on the Mayor's support of town centre development. Will this support focus on the metropolitan centres highlighted in the draft strategy or draw in a broader range of town centres? How does the proposal to support town centre development (proposal 5D) link with the proposal to encourage further development of

diverse and attractive neighbourhoods (Proposal 5F) that refers to smaller and local town centres?

Securing investment in infrastructure

Given the expected reductions in public finance, new and innovative funding mechanisms need to be explored to secure investment. London boroughs have a central role to play in developing these. Tax Increment Finance (TIF) models should be explored further. These models generate investment by allowing local authorities to borrow against future increases in business revenues and council tax, retaining a proportion of these revenues⁹. LB Barnet has already developed one such model through its Barnet Financing Plan for development at Colindale. The Core Cities are advocating another model through Accelerated Development Zones. LB Croydon and LB Barking and Dagenham are testing out new public-private partnerships through asset-based development vehicles. London Councils is keen to work with the Mayor, the LDA and the Homes and Community Agency to test out how these and other models might be developed further in London to unlock investment and development.

⁹ These currently go straight to central government.

West London Partnership

Draft Response to the Mayor's Economic Development Strategy 2009

Introduction

1. The Mayor's draft Economic Development Strategy (EDS) has been published for consultation alongside with the Draft London Plan and the Mayor's draft Transport Strategy. The closing date for the consultation is the 12th January 2010. This is the first time that a consultation has taken place simultaneously on all three documents which have also been produced using a common evidence base. This should provide a good opportunity to ensure the integration of the key strategies for London. The London Plan is the overarching spatial document planning strategy and the other Mayoral strategies and borough planning documents should aim to realise the objectives of the London Plan (London Plan Policy 1.1).
2. The Mayor's Forward to the EDS outlines his vision for London; to be the best big city in the world, excelling as a global city and ensuring the people that live there are included in its economic development. The strategy sets out the long term aims to achieve this, clarifying roles and responsibilities and starting to set future policy direction. It also outlines the threats and opportunities.
3. There are five objectives outlined in the Economic Development Strategy to help achieve the overall vision and these are set out below in this report. In addition there are five cross-cutting themes: innovation, value for money, equality of opportunity and diversity, sustainable development and environmental improvement, community safety, health and health Inequalities and climate change adaptation and mitigation
4. The Mayor's objectives for London in the draft EDS are important and should be supported. They will contributed to the Mayor's overall vision for London which informs all his strategies: 'Over the years to 2031 and beyond, London should excel among global cities, expanding opportunities for all its people and enterprises, achieving the highest environmental standards and quality of life, and leading the world in its approach to tackling the urban challenges of the 21st century, particularly that of climate change'.
5. The EDS is drafted at a high level of strategy and policy with some general objectives and statements about what the Mayor will do, with partners, to achieve them. This makes analysis of the EDS difficult both in terms of the prospects of its objectives being achieved and in terms of the likely impact of the Strategy on West London. Whilst the imminent release of the LDA draft Investment Strategy for 2010 may assist such an analysis it is likely to cover short/medium term investment decision of the LDA's resources and may not therefore provide that additional level of detail about the EDS

which would assist in assessing it and enable partners to understand how to build in the EDS to their own strategies and plans.

6. In particular, the EDS is mainly thematic in its approach and it does not have the same level of spatial analysis and objective setting as the London Plan or the Mayor's Transport Strategy (MTS). This then presents a number of difficulties for West London partners. Firstly, it is difficult to know the extent which the EDS will support in practical terms the intentions of the London Plan and will work with the implementation of the MTS. For instance, as London Councils has suggested the detailed planned transport investments proposed in the MTS and the strategic Opportunity Areas and Growth Corridors within the London Plan need to be brought together to give a schedule of infrastructure projects that will direct LDA and other public investments.
7. Secondly, it's uncertain whether the analysis on which the EDS is based and the objectives recognise that the London economy is not homogeneous and that Outer London economies such as that of West London have specific challenges and opportunities which should be tackled (see both West London evidence to the OLC and the Commission's interim conclusions). On the other hand this is acknowledged in the London Plan and MTS.
8. The EDS does not relate its aims and objectives to measurable outcomes through the period of the Strategy. It would be helpful if it did and would enable a better appreciation of the scale of investment required and the delivery risks involved.
9. Like the London Plan the EDS appears to take the highest employment forecast for employment growth (that of the GLA itself) and does not consider alternative economic recovery and growth scenarios.
10. The London Plan suggests that population and jobs grow broadly at the same rate in the Plan period. Although forecasting over this period must have a large margin of error, if the employment rate is to be increased and worklessness fall then jobs need to grow at a faster rate than employment. How this is to be achieved is not explained.
11. The role of partners in the implementation of the EDS is set out in the chapter on Implementation. However this simply names partners and says nothing about how the joint planning and delivery are to take place. It would, for instance be helpful to see acknowledgement of the need to co-ordinate activity thorough work with London Councils and sub-regional partnerships and how Local (and sub-regional) Economic Assessments can be used for strategy and plan making to support the delivery of the Mayor's objectives in the Plan and Strategies.
12. In summary overall it's suggested that the WLP –
 - Support the Mayor's overall aims and objectives for London

- Proposes that the final EDS provides further detail on the objectives and incorporates some high level and measurable outcome targets for each
- Asks that the final EDS shows how it will support in more detail the delivery of the London Plan alongside the MTS
- Proposes that the EDS provides a better spatial analysis which recognises the diversity of the London economy and particularly the distinct characteristics of West London
- The EDS should provide a better indication in the Implementation arrangements and some of the ways that the LDA expects to work with partners at all spatial levels

Overview of Objectives

13. Objective 1: to promote London as a city that excels as a world capital of business

The Mayor will work with partners to:

- *strengthen the promotion of London as a global leader and encourage promotional agencies to work collaboratively*
- *promote London to the world, taking full advantage of the 2012 Games opportunity*
- *develop a comprehensive international trade strategy to increase London's exports, particularly in rapidly developing markets such as India and China*

14. The WLP could support the proposals in this chapter, particularly around strengthened and more co-ordinated promotion of London between key agencies. This is a key strategic role for the Mayor and capitalising on the promotional opportunities afforded by the 2012 Olympic and Paralympic Games.

15. There is a risk that promoting London as a global city with its clusters of world-beating businesses will inevitably lead to a focus on the Central Activities Zone. However, there are distinct offers within different parts of London and their strengths should be recognised and promoted. London-wide promotional agencies should be encouraged to work closely with boroughs and sub-regional partnerships and collaboration should be encouraged and supported. West London is an important investment location in its own right and business partners and the boroughs have been active in promoting and seeking investment and this provides an important partnership opportunity for the Mayor and the LDA in realising this objective.

16. In realising this proposal in West London the EDS should provide for close links between promotional work and investments and other actions in the EDS and the London Plan proposals for large scale development in opportunity areas and in Strategic Outer London Growth Centres, particularly seeking to build on the sectoral strengths of these as proposed in the London Plan.

17. Objective 2: to ensure that London has the most competitive business environment in the world

Innovation

The Mayor will work with partners to further develop London's capacity for innovation, particularly for SMEs, by:

- *encouraging collaboration across sectors,*
- *promoting more productive links between business and academia,*
- *providing support for innovative activities,*
- *promoting entrepreneurial skills and*
- *helping in accessing funding*

Business support

- *Promote cost effective business support programmes for London's businesses, and especially its SMEs.*
- *Continue to be an active champion of business and lobby government and encourage an open and competitive business-friendly environment and a flexible and skilled labour market.*
- *Work with partners to ensure costs to business are kept as low as realistically possible.*
- *Work with the neighbouring regions to achieve mutual economic benefits.*

Quality of life

The Mayor will work with partners, including boroughs, the NHS and the Metropolitan Police, to:

- *improve the quality of the environment in London*
- *improve health in London and reduce health inequalities*
- *improve and promote London's overall cultural, sporting and entertainment offer*
- *increase safety, drive down crime and particularly to counter business crime in the capital*

17. The proposals for developing London's capacity for innovation by encouraging collaboration and promoting more productive links between business and academia are welcome. It would be useful to know some more detail of the type of support that the Mayor will provide in this way and the scale of investment returns that the Mayor will seek through his support. It would also be helpful to know whether there is a strategic approach in particular to sectors which could achieve above trend growth in employment (as suggested in the London Plan) so that scarce resources can be targeted most effectively.

18. In particular in West London small businesses - SMEs, micro-businesses and the self-employed – make a significant contribution to employment and GDP and so an emphasis on support for small businesses is welcome.

19. The proposal in the draft strategy that public sector support should complement support provided by the private sector and focus on businesses and individuals that do not have ready access to private sector support is also welcome. Currently some BME groups, disabled people and women are under-represented in terms of owning and starting

businesses in London and the strategy should recognise this and focus some of its resources on these more disadvantaged groups.

20. It goes without saying the business support should be cost effective; that is a principle that we would all aspire to in delivering services. So we need to be clear why that is stated specifically here and what the Mayor and LDA might mean by it and by saying pre-start and small/early stage businesses would be supported 'in a low cost way'. We would be concerned, as would other partners such as London Councils, if spend on pre-start and start-up businesses is significantly reduced or support is limited only to accessing information via the Internet. For some types of small and micro-businesses and the self-employed face to face contact is important; and this is particularly so where as a matter of policy measures are put in place to increase the proportion on small businesses from under-represented groups.
21. In their response London Councils notes that the LDA has been working with London Councils and London boroughs on the introduction of the 'Solutions for Business' package. This dialogue needs to continue to inform the LDA's decisions about the 'Solutions for Business' package that will be on offer in London. London boroughs support some aspects of the 'Solutions for Business' package – but that support is non-statutory and not always available in every borough. We should support the London Councils proposition that London boroughs, via London Councils, should have an early opportunity to discuss the LDA's proposals for the 'Solutions for Business' offer in London. This would ensure that local and regional funding and activity are aligned and do not result in significant gaps in provision. West London boroughs, through London Councils, and other stakeholders in West London should also be involved in formal dialogue on the specification for the next Business Link contract, as this will have a significant impact on the focus of business support services in London.
22. We welcome the proposal that of working with neighbouring regions to achieve mutual economic benefits and in West London we are already part of a dialogue with regard to the London – Luton corridor and have led on discussions with SE region partners with regard to transport (with TfL) and on the Western Wedge. We ask that the Mayor and LDA should ensure that discussions around key strategic regeneration and opportunity areas include the WLP stakeholders and that we are engaged in both the design of the mechanisms for liaison as well as the substance of the subsequent dialogue.
23. The WLP wholeheartedly agrees with the objective of improving the quality of life in London; through the WLP and individual stakeholders in West London have consistently made the linkages between a good quality of life and our competitiveness. Our West London EDS, 10 Point Transport Plan and evidence to the OLC have emphasised the need for co-ordinated action to improve the quality of life in West London and proposed a range of measures to support the achievement of this. Many of these measures can be delivered by West London partners in collaboration with the GLA group and the Mayor's London Plan and MTS and EDS are a key means to achieving this. This is why the integration of the London Plan and the

Mayor's strategies and clear links between them and West London and local strategies and plans is important (as stated earlier).

24. We welcome the importance given to the London's cultural, sporting and entertainment offer. In West London this is particular important, especially when related to the leisure and tourism sector which had significant growth potential in West London and to the strength of our creative industries. It would assist us in understanding the likely impact of the EDS objective and the links between this and West London and borough strategies if there was an explanation of what the Mayor intends to do as the current wording is not clear about what kind of action we could expect. The links between these actions and those to increase competitiveness and employment through supporting the cultural sector could also be clearer.

25. Objective 3: To drive London's transition to a low carbon economy and to maximise the economic opportunities this will create

The Mayor will -

- *Lead by example and work with partners to ensure that London realises the great economic opportunities associated with the move to a low carbon economy.*
- *Work with partners and lobby government to develop the scale of investment and environmental infrastructure needed to support a low carbon London.*
- *Encourage business to participate in exemplary projects to cut carbon such as the creation of a showcase Green Enterprise District and of Low Carbon Zones.*
- *Work with partners to ensure London's workforce has the right skills so businesses fully realise the employment opportunities from the global move to a low carbon economy.*
- *Create a policy framework to address climate change and will work with private, public and voluntary sector partners to improve their environmental performance.*

26. The WLP supports the measures outlined to ensure London's economy becomes a low-carbon economy and establishes itself as a low-carbon world leader and will work with the GLA/LDA to achieve this.

27. Objective 4: To give all Londoners the opportunity to take part in London's economic success, access sustainable employment and progress in their careers

The Mayor will work with partners, including boroughs, the LSEB and the HCA, to:

A good start in life

- *Help ensure that all London's children get a good start in life, and encourage relevant agencies to work towards the government's target to end child poverty being achieved in London by 2020.*
- *Ensure that all London's young people have appropriate opportunities to gain the knowledge, skills and confidence to succeed in London's labour market.*

Employment and skills

- *Raise London's employment rate, and reduce the employment rate gap for disadvantaged groups, by removing barriers and disincentives to work and providing more personalised and joined-up services to help people into employment and career progression.*
- *Significantly improve training and employability support so as to help people secure and retain a job with a particular focus on neighbourhoods with high concentrations of worklessness.*
- *Help meet the aspirations of Londoners to acquire relevant skills and qualifications to progress in their careers.*

Housing

- *Ensure there is sufficient and suitable housing to meet the needs of London's growing population and workforce, and to address problems of homelessness and overcrowding.*

28. The WLP supports this Objective and broadly agrees with the analysis in the EDS. West London through the work of the boroughs and partners and in the context of the West London Working City Strategy Pathfinder has been active in co-ordinating and measures to tackle worklessness and skills issues. Well planned, good quality and customer focused interventions are necessary to tackle the related problems of child poverty and worklessness. We support the strategy and aspirations of the LSEB and believe that in West London they are best operationalised at the sub-regional level, co-terminus with the JCP district. Within this context boroughs and businesses have an important role to play alongside LDA, the Adult Skills Service and the DWP funding provision.

29. We believe there is much to learn from the work of the WLW CSP which the LDA should take on board in designing and operating its programmes and agree with the London Councils developing proposals regarding alignment and devolution of contract management of services and the pooling of budgets. We would like to see the LDA taking a lead in working in this way. We would also wish to see a more explicit acknowledgment of the important role of businesses in realising this objective.

30. The WLP and the boroughs within it would like to be consulted early in the process to determine which neighbourhoods will qualify if the LDA is to allocate funding in this way.

31. We also refer back to our concerns about whether employment growth can be delivered at a high enough a rate to ensure that there is an adequate supply of job opportunities to reduce the level of worklessness given the population growth predicted.

32. Objective 5: To maximise the benefits to London from investment to support growth and regeneration, and from the 2012 Olympic and Paralympic Games and its legacy

Work with partners, including boroughs, developers, the LDA, TfL and OPLC to:

- *Strengthen the economy across London including removing barriers to outer London fulfilling its potential, and support the development of town centres in outer and inner London as hubs for their communities and local economies.*
- *Ensure that investment sustains and increases central London's ability to be competitive, productive and innovative.*
- *Fully seize the unique regeneration opportunity offered by the 2012 Olympic and Paralympic Games.*
- *Identify capacity to accommodate large-scale employment and housing development, including in the London Plan Opportunity Areas, through the planning system, transport proposals and investment support.*
- *Take a co-ordinated and targeted approach to regeneration across London.*
- *Encourage the further development of diverse and attractive neighbourhoods throughout London and encourage local economic development as an essential ingredient in this.*
- *Achieve the full economic development benefits of London's transport schemes and bring forward the necessary further investment in London's infrastructure.*
- *Achieve mutual economic benefits from investment for London and the wider South East.*

33. The objective is not clearly phrased – is the intention a narrow one to maximise the benefits of currently planned investment (which is mostly only committed in the first part of the Strategy period) which it appears from the wording or is it to do that and seek further investment which could be inferred from what the Mayor says he will do? The latter is preferred.

34. The recognition of the need to address underperformance in employment growth in Outer London is welcomed. However, this should not only be referenced here but should be a theme throughout all of the strategy.

35. When reviewing this section on what the Mayor will do to tackle underperformance in outer London its unclear what the EDS will contribute in addition to the few measures quoted from the London Plan and MTS. There is no mention at all of Strategic Outer London Development centres which are a key mechanism proposed by the London Plan in this connection. There is no suggestion of any leadership or investment role that might be expected from an RDA in taking forward and co-ordinating actions to secure the employment growth opportunities outlined in the London Plan. The WLP would like to see in the final EDS what is proposed be done to take these proposals forward as well as the contribution to be made by the LDA through the EDS to growth sectors and town centre vitality.

36. The proposals around the legacy benefits of the 2012 Games are focused on the Olympic Park and East London and we acknowledge the importance of this. However, there are other Olympic venues outside East

London and the legacy benefits are an issue for the whole of London. It would be desirable for the EDS to be clearer how it will contribute to the realising the legacy of the 2012 Games for London generally and for each sub-region. It could recognise the role of the sub-regional partnerships in this, for instance that of the West London 2012 Partnership.