

# DRAFT LONDON PLAN CONSULTATION

## *RESPONSE OF THE WEST LONDON ALLIANCE GROUP OF LOCAL AUTHORITIES*

21 February 2018

### **1. WHO HAS BEEN INVOLVED IN THIS RESPONSE**

This consultation response has been prepared by the West London Alliance (WLA), a partnership of seven London councils - Barnet, Brent, Ealing, Hammersmith and Fulham, Harrow, Hillingdon and Hounslow. This is amongst the largest joint working areas of local authorities in the United Kingdom.

### **2. OVERALL VIEWS ON THE LONDON PLAN**

The WLA welcomes the opportunity to comment on the draft London Plan and to work with the Mayor and his Team to shape its content as it moves towards adoption in 2019. Particularly welcome is the new emphasis on “good” growth that benefits people living, working in and visiting London, whatever their background. Welcome too is the recognition within the draft Plan of the nature, breadth and scale of the strategic challenges that London faces, and the scale of the response required to meet them across organisational and sectoral boundaries.

We note and welcome the reference within the draft Plan of the “West London Orbital” railway line that connects a number of regeneration areas including Brent Cross, OPDC and the Great West Corridor, and which has potential to unlock in the region of 20,000 new homes across the sub-region. The line makes use of spare capacity along existing, underused freight and passenger tracks along its entire length. We would like the London Plan to give this scheme the same weight it already has in the Mayor’s Transport Strategy (Proposal 83), allowing us to work with you, TfL, Network Rail and government to bring this exciting, affordable and deliverable scheme to fruition in the next few years.

In addition to the above however, West London boroughs share a number of issues and concerns with significant elements of the Plan in its current form, and with which we would welcome constructive engagement with the GLA on prior to its finalisation. Chief amongst these issues is the high level that borough housing targets have been set at, and the associated methodology that has been used to set them, which we believe from our recently commissioned West London Strategic Housing Market Assessment has resulted in a significant and systematic under-estimate of the average household size across the capital.

We note that, whilst the priorities identified in the draft Plan are to be commended, there is a very notable gap between the worthy aspirations that these priorities represent and the

resources available to local government to deliver them. This “resourcing gap” must be addressed as a matter of urgency if we are to avoid the risk of over promising and under-delivering for Londoners. This could be done via further devolution of national and London budgets to local areas, further roll out of Business Rates devolution, closer joint working with the GLA on how MCIL is allocated and spent, a more unified approach to maximizing and making best use of Section 106, and joint lobbying with central government for additional funding and powers.

Finally, for many years the “sub-regional boundaries” used by the GLA and TfL to plan their work have been inconsistent with the way that local authorities in West London actually work. Specifically, we consider that the London Borough of Barnet should be considered by the GLA as a part of the “Western” sub-region used by the GLA and TfL. This small change would cost nothing to implement and is currently an active barrier to more effective and efficient joint working between boroughs with an established track record of doing so.

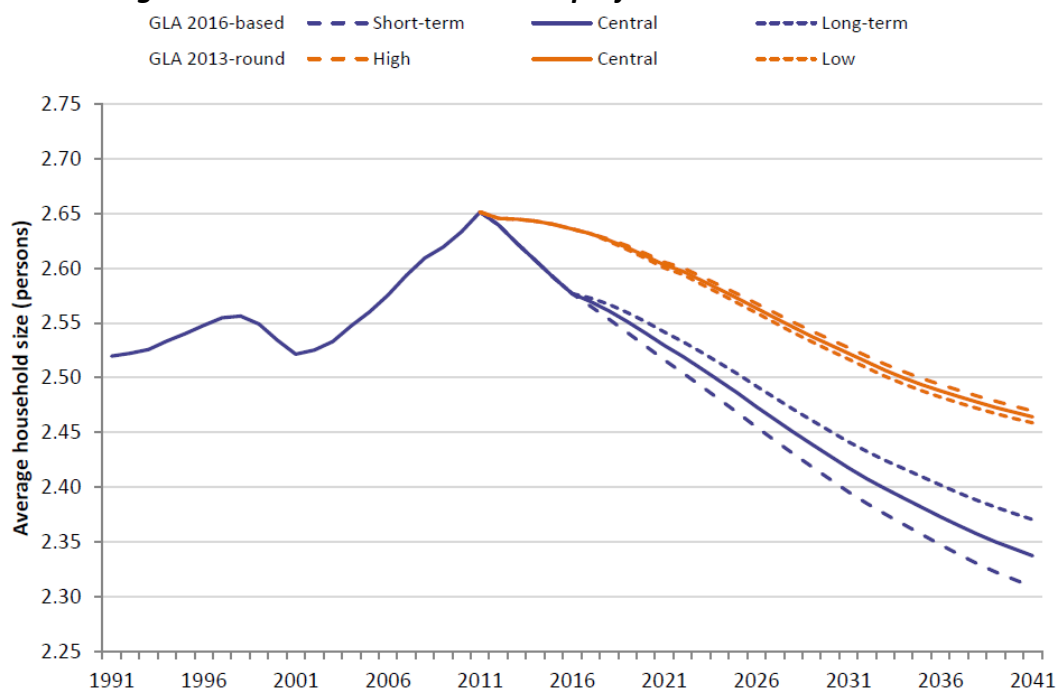
**KEY ASK 1:** We would welcome constructive, collegiate dialogue with the Mayoral team in relation to these issues and with those that follow, and look forward to continuing to work with the GLA to improve lives and outcomes for people and businesses in West London.

**KEY ASK 2:** We would like the sub-regional boundaries used by the GLA and TfL to reflect the area of the West London Alliance group of councils. This would cost nothing for the GLA to implement and would greatly facilitate improved joint working across borough boundaries and with the GLA to deliver the best possible outcomes for residents and businesses in West London. Not doing this will needlessly waste resources and hinder future planning and place making in West London.

### 3. HOUSING

Delivering the housing that a growing population needs is rightly the top priority in the London Plan. It repeatedly emerges as the highest concern for Londoners in surveys, and increasingly businesses too are identifying it as a constraint on future success as they struggle to convince new talent to relocate to the capital as a result of the high cost of living.

West London councils share the view that, whilst a step change in the rate of housing supply is required, the **housing targets** described in the London Plan are not supported by a robust or defensible methodology. Specifically, the joint West London SHMA we have recently commissioned together suggests that the average household size predicted in the draft London Plan in the coming years is too low, and does not adequately reflect changing patterns of living and evolving definitions of what a household is. This under-estimation of average household size means that housing targets set in the Plan are systematically higher than needed, and of the wrong sort, as required by London’s current and future population.

**Figure 1: Average household size estimates and projections are underestimated**

**KEY ASK 3:** We would welcome a constructive dialogue with the GLA Housing Team to review housing need methodology that has been used to set borough housing targets, particularly in relation to household size and composition projections, so that we can arrive at mutually agreed housing targets that meet the evidence-based needs of Londoners. Furthermore, the GLA should indicate that it is willing to keep borough housing targets under review as new population projections become available in the coming months, for instance from the ONS.

The draft London Plan puts emphasis on the role of **small sites** being used to deliver a significant proportion of the supply targets in boroughs. Small sites will of course have a role in delivering the homes Londoners need, however the level of emphasis put on these sites to deliver homes at the scale required is unrealistic. For example some boroughs in West London who already have permissive planning codes relating to small sites, in line with those proposed in the draft London Plan, will be required to increase delivery tenfold. This is simply unrealistic and may set the system up to fail to deliver the targets, reducing the credibility of the entire system.

**KEY ASK 4:** The focus on small sites in the draft London Plan should be rebalanced with options for boosting supply in other types of site given a higher level of emphasis than is currently the case. West London boroughs would welcome further dialogue with the GLA to get the balance between small sites and larger sites right, particularly in light of the relaxing of the density matrix.

The relaxation of the **density matrix** is supported by West London boroughs and is welcome, particularly the emphasis in policy D6 on taking a design-led approach that makes the best possible advantage of new infrastructure link. This move will allow boroughs to take a more flexible, strategic approach to place making, delivering a step change in supply in some areas where this is appropriate for the local context, and also allow new communities to be developed around the new infrastructure hubs and connection such as the West London Orbital line) that will become increasingly important as Londoner's increasingly move away from the private car and towards public transport, cycling and walking.

Continued car use in the lower density suburbs of Outer London remains a reality, irrespective of public transport service and reliability improvements. We therefore advocate more flexibility to support more local evidence based approaches to car parking, which are less restrictive than the London Plan for residential development (see ask 7 below).

Innovation led by both the market and by public services will become increasingly important in the future in order to meet housing need. West London boroughs are concerned however that some of these models, particularly those based around "**collective renting**" models, are potentially restrictive and exploitative to individuals, and whilst they may have some role to play, their place in the future London housing mix, and their implications on community cohesion and place making, should be carefully considered by the Mayor.

#### 4. ECONOMY

We agree with the focus in the draft London Plan on safeguarding and growing the supply of **low cost work space** for small and growing business, and entrepreneurs and are currently undertaking much work to encourage this through the forging of new partnerships with innovative social enterprises, such as Wimbletech, who are making available under-used public buildings to micro-businesses, and the adoption of Article 4 directions. Policy E2 should give particular consideration to the provision of low cost workspace near to local and district centres. This will contribute to a mixed economy and support the daytime economy.

As with other areas we remain concerned with the adverse impact that **office to residential permitted development rights (PDR)** are having on the availability of office space, particularly in Outer London. We note that residential developments created by PDRs are generally done outside of the planning system and are of highly variable quality. By definition they do not form part of wider planned place making or community building activity and so are not contributing to the wider role of planning authorities to create vibrant, successful and sustainable communities.

We welcome the direction of travel set out in the draft plan (E7) to enable greater flexibility in the way **strategic industrial land (SIL)** is configured, to allow greater intensification and the creation of high quality, mixed use communities that do not result in a net loss of employment space. Such a move is essential if boroughs across London are to be enabled to

think creatively about the best way to strike the right balance between employment space and living space, and to deliver new homes and communities at the scale needed.

**KEY ASK 5:** We would welcome a constructive dialogue with the GLA's Planning and Regeneration about a number of strategic opportunities to intensify SIL that both safeguards existing employment floor space and allows high quality new communities to be created, through a coordinated local planning approach.

## 5. INFRASTRUCTURE

We support policy T9 that the Mayor will make use of **Mayoral Community Infrastructure Levy (MCIL)** resources to secure funding towards major strategic infrastructure. In line with policy T9 WLA boroughs have jointly developed shared strategic infrastructure priorities, particularly the "**West London Orbital**" line that is included in the draft London Plan (p.47) and the Mayor's Transport Strategy.

The line runs from West Hampstead and Hendon at one end and Hounslow at the other, and would connect the major regeneration areas of Brent Cross, Wembley, and Park Royal whilst supporting the unlocking of significant potential new housing intensification and regeneration opportunities around Neasden, the Golden Mile and potentially also Staples Corner. It would allow for housing intensification in places like Gladstone Park. The line would provide orbital travellers, who are currently required to make orbital journeys using the heavily congested and polluted the A406 North Circular Road, with a significantly faster and more convenient alternative that improves their transport experience. This scheme makes use of existing underused twin-track freight lines and passenger lines along its entire length.

West London boroughs have jointly commissioned a feasibility study with the support of TfL into the operation of the line. The key points can be summarised as:

- The scheme is **technically feasible** including in relation to Acton Wells Junction and Bollo Lane level crossings, although further detailed work is now needed through the formal GRIP stages.
- Forecasts derived from TfL's modelling suite indicate **significant levels of passenger demand** for the scheme and benefits for passengers across the public transport network.
- **BCR of 2.2:1** according to DfT methodology.
- Analysis by boroughs has identified potential to unlock approximately **22,000 new homes** along the length of the line, including in the vicinity of a number of new stations. This would yield in the region of £200m of Community Infrastructure Levy.

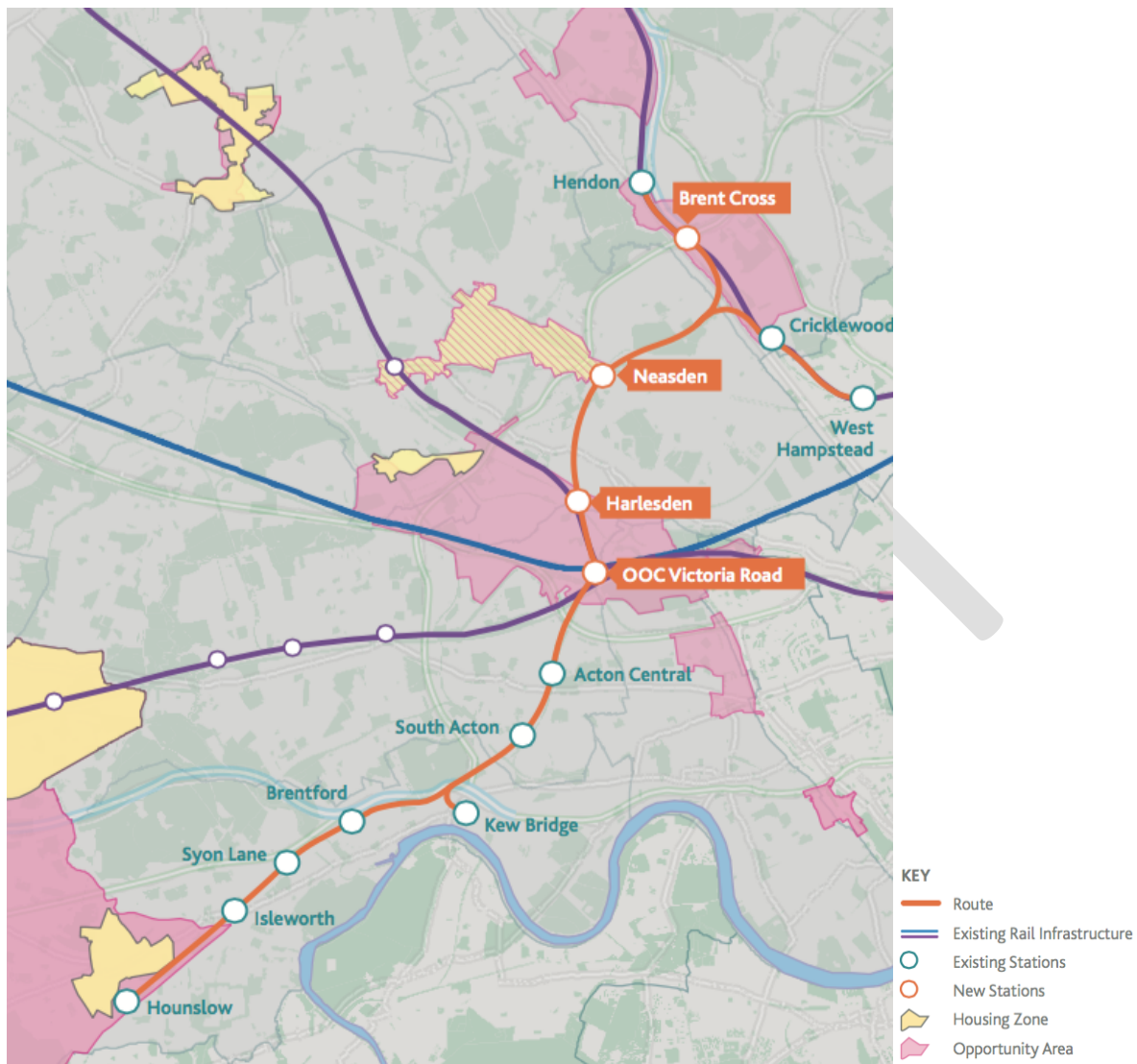
- With WLO there will be **significant time savings for public transport users** and a competitive alternative to car use. The level of competitiveness would depend on when the car journey is being made, e.g. peak periods or off-peak.
- Stronger **integration of the OPDC area the communities that surround it**, helping to weave it into the wider London economy. The West London Orbital Line would allow orbital travellers to change to Crossrail and HS2 lines without needing to first travel in to London.
- **Strong strategic fit with the priorities set out in both the draft MTS and emerging London Plan** including 1) improving the transport experience, 2) New homes and new jobs, and 3) Healthy streets and healthy people. The Scheme is also consistent with the Mayors focus on “Good Growth” as set out in the emerging London plan.
- The scheme **makes better use of under-utilised orbital freight lines**, sweating assets and maximising value from London’s existing transport infrastructure and minimising any disruption to residents and businesses associated with major new schemes.

In addition, the West London Economic Prosperity Board (WLEPB), a formally constituted cross-party committee consisting of the leaders of six West London boroughs has made this scheme a standing item on its agenda and have given it formal cross-party political support. Through the Committee the West London boroughs have also agreed to incorporate the scheme in their Local Plans so that it now forms part of their integrated long-term strategic planning in the future, as suggested by the Deputy Mayor for Transport.

As well as its technical deliverability, housing supply/regeneration benefits and good strategic fit the line has the potential to offer London an opportunity to test innovative new approaches to suburban-metro rail such as making use of Battery-powered rolling stock rather than polluting diesel units. It supports the principle of “*good growth*” by making better use of what are currently notably under-used freight lines that happen to connect some of the most significant housing and employment growth areas in London including Brent Cross, Wembley, Park Royal, and the Golden Mile in Hounslow, significantly reducing journey times between these areas as shown in figure 2 below.

We note that suburban metropolitan rail schemes such as this will become increasingly essential in the years ahead if the Mayor is to meet the target of 80% of all journeys being by foot, bike or public transport by 2041, against the context of the population approaching 10m by the 2040s and the majority of population growth expected to occur in precisely the sorts of outer-London areas that the West London orbital connects. Schemes with strong cross-party support such as this are also more likely to prove successful.

Analysis by borough planning departments of the land that the line would pass through has identified capacity for approximately 22,000 new housing units and approximately £200m of CIL. We believe that, given the positive feasibility case, high value-for-money case, passenger demand numbers and strategic fit of the line there will be viable options for securing additional funding from a range of sources including government and the private sector.

**Figure 2: Route of the West London Orbital Line**

Further, more detailed GRIP stages are now needed to explore the detailed specification of the line, and well as to develop a more focused funding package for its construction and subsequent operation building on the analysis described above.

**KEY ASK 6:** We invite the Mayor, through TfL, to make this scheme a part of the story of transport in London through the London Plan and mayor's Transport Strategy, and to continue to work with West London boroughs to bring this line to completion by the 2020's.

The London Plan contains overly constraining policies relating to parking space. West London boroughs recognise the challenges associated with parking, however we consider that the best way to meet this challenge is to allow boroughs to tailor their local approaches and policies in relation to parking to the local circumstances and conditions, which they are best placed to do.

**KEY ASK 7:** We ask that the Mayor recognise that boroughs are best placed to develop and implement parking strategies that reflect local circumstances, and that boroughs are enabled through the final London Plan to take more tailored and locally appropriate approached to parking.

The draft London Plan sets out a range of policies to ensure that new developments avoid or minimise environmental impacts where possible and incorporate climate change adaptation measures. The more ambitious approach to managing air quality impacts of new development is welcome, although further details are required about how this will work in practice. The attempt at reconciling the existing Plan's conflicts between the air quality and carbon reduction policies is also welcomed, but further work is required to ensure that the key Policies of SI1 on air quality, SI2 on minimising greenhouse gas emissions and SI3 on energy infrastructure are consistent with each other and provide clear direction on how energy strategies for major developments need to be designed to reduce greenhouse gas emissions without impacting on local air quality.

There are two areas where policies in the current London Plan have less emphasis than the previous version – contaminated land and sustainable design and construction. These policies are important if we are to mitigate contamination on development sites and to ensure major developments achieve the highest possible levels of sustainability in their design, construction and operation. It would be useful if these issues were to be included.

## **6. SKILLS, EMPLOYMENT AND PRODUCTIVITY**

The WLA supports the intention in the draft London Plan, through policy E11, to develop an **effective and responsive skills system** through the Skills for Londoners Programme. In particular we welcome the intent to work across borough boundaries to coordinate activity, share data, and to develop a more consistent approach to making use of S105 funding to deliver a skills system that London and Londoners need.

The WLA has been working with the GLA and Skills for Londoners for some time, and have recently approved the West London Skills, Employment and Productivity Strategy that aligns fully with the London approach and priorities.

We also welcome the intention in the draft London Plan to work across boroughs to share data with a view to developing a more joined up approach to S106, particularly at the sub regional level.

**KEY ASK 8:** West London boroughs would welcome ongoing engagement with Skills for Londoners, particularly in relation to the development of a more uniform approach to making use of Section 106 monies from the construction sector.



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