

Outer London Commission: Outer West London Submission

This paper has been produced by the West London Alliance (WLA), following the Outer London Commission (OLC) meeting in public for West London held on the 1st November 2011, in response to the questions posed by the OLC.

The responses submitted by the WLA are those received from the five Outer West London Boroughs of Brent, Ealing, Harrow, Hillingdon and Hounslow (all are partner boroughs of the WLA) to each of the questions detailed in the Paper 1.1 produced by the OLC. For the purposes of this submission and for the sake of simplicity, the Outer West London Boroughs will be referred to as the 'Boroughs'.

As a result of the varying opportunities and challenges in Outer West London there are variations in views from the Boroughs. The positions given by the Boroughs to the questions are reflective of their locality and the characteristics of their individual areas, particularly in relation to proximity to the radial transport corridors and current and committed transport infrastructure.

However, there is a general consensus from the Boroughs, particularly in the context of the Government's agenda with regard to Localism, that any further guidance given in Supplementary Planning Guidance (SPG) should not be too prescriptive and stress that SPGs must not negate the local flexibility allowed for in policies of the London Plan. These are comments that apply consistently to all of the issues that the OLC are focusing on.

The following sections detail the responses from the Boroughs and highlighted are some points of clarification sought from the OLC.

1. Parking Policy

2.4.1 Is further guidance necessary to improve the clarity of these policies and standards for development control purposes? If so, what is required?

The Boroughs broadly agree that the London Plan policies and standards allow for local flexibility in setting parking standards and consider that for Outer London boroughs this flexibility may be needed to respond to local circumstances and requirements. However, Hillingdon seeks to maximise the flexibility and considers there to be need in their borough, reflecting their position on the edge of Outer West London, for greater flexibility in certain circumstance whilst remaining in general conformity to the London Plan.

Flexibility in parking standards for businesses needs to recognise the particular business occupier requirements, operational characteristics and workforce catchment area and work shift patterns. Hounslow raised during discussion on this matter at the OLC meeting that in most circumstances boroughs are dealing with applications from speculative users and the occupier is unknown therefore it may be difficult to consider all of these matters when an application is submitted.

Brent considers that the current parking standards set out in the London Plan provide sufficient flexibility for the boroughs' needs, as the policies already provide latitude for Boroughs to apply different standards for residential, retail and employment uses. Brent's current UDP includes parking standards for a variety of commercial uses e.g. for shops (defined by gross floor area – those less than 2,000m² and those over 2,000m²), food and drink and assembly and leisure uses are also assigned specific standards. Brent Council will shortly be reviewing its parking standards as part of defining its development management policies, but any changes recommended can be accommodated within the current ranges set out within the London Plan.

Ealing commented that the London Borough of Ealing officers use the policies and standards given within the London Plan and current UDP (and will use the LDF development management documents when these come into effect) and consider these

to provide sufficient flexibility for Ealing's requirements. Ealing considers that this approach is consistent with the Government's 'Localism' agenda.

Hillingdon welcomes the movement towards greater flexibility but given the borough's position on the edge of Outer London Hillingdon considers that even greater flexibility in applying more generous parking standards for all types of uses is needed, particularly in the town centres within Hillingdon. Hillingdon raised these concerns at the OLC meeting and highlighted that Watford and High Wycombe are Hillingdon's main competition and that whilst greater flexibility is given to town centre parking standards these do not go far enough.

Hillingdon would support the provision for boroughs to be able to set their own detailed standards within LDF Development Plan Documents. Hillingdon's current UDP Current Saved Policies define a much wider range of parking standards to cover the variety of commercial uses present in local town centres (e.g. for various food and drink or leisure services). The range of parking standards for food retailing in the London Plan corresponds with Hillingdon's range of standards in the UDP Saved Policies. The Mayor's non-food standards range from one space per 30 to 60 square metres floorspace, depending on public transport accessibility. Hillingdon's approach is that more generous provision of one space per 25 square metres is required and would prefer to retain the flexibility to vary this standard depending on local circumstances.

Harrow have commented that the removal of national parking standards and density standards, through the National Planning Policy Framework (NPPF), will have implications for Outer London Boroughs competing for homes and jobs with the Home Counties. Harrow added that this suggests that some framework for flexibility is necessary or that the Mayor should be encouraged to engage with surrounding Counties more fully and explicitly to ensure that cross boundary decisions are consistent and do not skew regional growth patterns. In the absence of this, Harrow suggest some balance between the approach of Ealing/Brent and Hillingdon may be required. This could be addressed in the GLA consultation process for strategic applications (with a recognition of the Outer London "competition" issues with Counties) instead of a formal SPG.

A final point made on this question is in relation to hotel car parking provision. Attracting more hotels is an important part of some Borough's regeneration initiatives for their town centres to take advantage of, for example the proximity of Heathrow Airport, the presence of Brunel University and Crossrail development. It is noted that the Mayor's policy is not clear regarding hotel car parking provision in areas with high public transport accessibility. It states that parking should be limited to operational need. Boroughs would look to provide some car parking provision for hotel customers dependent upon the individual circumstances of a particular site.

2.4.2 Is further guidance to improve the clarity of these policies for LDF preparation purposes? If so, what is required?

The general view is that additional guidance is not necessary to aid the formation of LDF policies. The Policy 6.13 and Table 6.2 are clear when taken together about the ways in which LPAs should use their capacity to vary parking provisions in support of the LDF objectives.

Specifically in relation to Brent, the Brent Council's Core Strategy has already been adopted (in July 2010) and therefore further clarification is not required for this part of the development plan process, but Brent raises that it may be useful in developing their Development Management Policies. Brent Council will be revising its parking standards as part of the development of these policies.

It is noted that the Mayor is actively pursuing the provision of parking spaces for electric vehicles. Whilst boroughs may support greater use of electric vehicles in future as a more sustainable means of travel, clarification is needed on the timescale for the introduction of

electric charging points across London which will then make electric vehicle use in outer London more feasible than it is at present.

2.4.3 If yes, is further guidance required on the sort of justification (including its 'proportionality') necessary to support local parking policies for offices which depart from those of the Plan (Policy 6.13 Ed)? What form should this guidance take?

The guidance on employment parking which allows more generous parking standards in outer London is clear. Broadly, the Boroughs do not consider that there is need for further local latitude in setting parking standards, or further justification to support local parking policies.

Hillingdon considers that there is need for further local latitude in setting parking standards, and justification to support local parking policies.

2.4.4 Given overarching Policy 6.13A which "wishes to see an appropriate balance being struck between promoting new development and preventing excessive new car parking provision" and supporting text in para 6.45, should SPG make clear that, in coming to a view on this balance with regard to office development in outer London, particular weight should be accorded to evidence associated with "promoting new development" and addressing a "regeneration need" (Policy 6.13Ed)?

The overarching policy stance is agreed.

Ealing have commented that to encourage sustainable means of transport (in accordance with PPG13 and draft NPPF objectives) and using parking restraint as one tool to achieve this, adequate weight is already given to "promoting new development" and addressing "regeneration need". Notwithstanding these comments, Ealing raised at the OLC meeting that there are examples in Ealing of office developments with tight parking standards that were an error and it is key to get the parking standards right for the specific location being considered.

Brent commented that their current local parking policies allow for an increase of up to one third in parking to exceptionally be made in Strategic Employment Areas, Park Royal and the National Stadium Area, providing that applicants can demonstrate specific criteria, one of which is that the development is a key regeneration proposal supportive of regeneration projects in the area. In practice, this additional allowance has rarely been required, since most regeneration areas are close to public transport routes and interchanges. Therefore, whilst taking account of evidence according to these needs may be useful, Brent Council considers that such evidence should be considered on a case by case basis to evaluate the overall transport solution being proposed at the regeneration site.

Hillingdon commented that given their borough position in outer London the use of the private car for commuting is likely to remain the only realistic travel option for many people for some time. There is not the intensity of public transport routes and options that are available in central London for people to get to work. Given that Hillingdon is looking to pursue regeneration in the south of the borough, it is important for Hillingdon for parking policies to remain flexible for regeneration projects to reflect local circumstances.

Hounslow questions to what degree the flexibility applies to existing businesses. Specifically in relation to the 'Golden Mile' area, Hounslow council is aware of the number of key national and international businesses along on the Great West Quarter Road that could potentially leave the area. The OLC are asked to confirm whether regeneration includes incentives to retain existing companies? What is "significant"?

Hounslow also noted at the OLC meeting the number of sites that have been given over to parking and commented that this relaxation can bring with it environmental issues and these consideration must be balanced.

2.4.5 If so, how can this be defined most effectively? For example, should the town centre Office Guideline categorisations in Annex 2 be used to support more flexible, local approaches to parking policy? In the case of centres categorised as A (speculative office development could be promoted on the most efficient sites), should this mean a more liberal approach to private off street parking? In centres categorised as B (some office provision could be promoted as part of a wider mixed use redevelopment) should this mean a more liberal approach to public car parking serving the centre as a whole?

Please see responses above.

Ealing have noted that congestion and emissions in West London are already high and forecast to increase but with no new road capacity planned.

2.4.6 Similarly, in implementing Policy 6.13Ec on town centres facing 'identified issues of vitality and viability' can the town centre 'growth potential' categorisations in Annex 2 be used to identify these centres effectively as those which require a more flexible approach to public parking provision which serves the centre as a whole? Should this approach be focused on those in need of 'Regeneration', especially if they are also categorised as 'Low Growth' with poor public transport accessibility?

Hillingdon favours boroughs being able to approach parking provision on a flexible basis depending upon the needs of individual centres. Hillingdon noted that it is pursuing town centre renewal in centres other than those listed at Annex 2 of the London Plan and would want to be able to tailor parking provision to the needs of individual centres.

Ealing noted that all their borough town centres generally have higher PTALs (level 4 or over) and increased congestion resulting from more vehicles may actually harm town centre vitality and viability. Also research from the 'Travel and Spend in London's Town Centres' report from TfL in 2011 provides evidence that pedestrians and public transport are more popular modes for town centre visitors and these users have a higher monthly expenditure than car users.

Brent is primarily concerned about ensuring that development continues to be encouraged within town centres, and that application of future planning policy doesn't lead to out of town development being favoured over town centre locations. This includes application of parking standards as part of the toolkit, and the importance of being able to apply local parking policies to promote sustainable development which attracts enterprise and investment to Brent.

2.4.7 Is further guidance required on using the parking standards for development control purposes in terms of Policy 6.13C to provide the flexibility necessary to strike the balance sought in overarching Policy 6.13A? For example, could the SPG usefully suggest that in certain circumstances Transport Assessments could inform interpretation of the non-residential parking standards?

Boroughs do not consider that the SPG needs to provide this level of detail within its guidance.

Ealing makes reference to their responses outlined above. Ealing have added that providing more flexibility would weaken the effectiveness of parking restraint policies and using Transport Assessments to inform parking standards would increase the workload on boroughs and delay the determination of planning applications.

Brent and Hillingdon both considered that this is a matter for individual boroughs to take forward within their LDFs.

2.4.8 With regard to residential parking standards, do the guidelines shown in the TfL background note provide useful locational flexibility and sensitivity in taking forward the strategic objectives underlying Parking Policy 6.13 and Policy 3.3 to secure sustainable residential quality?

Boroughs consider that the guidelines provide useful locational flexibility and sensitivity.

Ealing commented the guidelines provide useful locational flexibility and sensitivity although noting that the majority of residential allocated sites in Ealing borough are in areas of good public transport accessibility e.g. the Uxbridge Road/Crossrail Corridor.

Brent considered that the guidelines provide useful locational flexibility and sensitivity, but that the public transport accessibility levels should be used as part of the overall toolkit for determining residential parking provision, and individual boroughs should be able to apply their own approach to secure residential quality.

Hillingdon commented that as outer London residents may travel to work within or outside London, the use of a car for commuting may be their only realistic option and would want to retain a flexible approach to parking provision in its residential suburbs for that reason, especially where off street parking provision can be made possible within the curtilage of dwellings. Hillingdon would not wish to see public transport accessibility levels used too rigidly to determine residential parking provision for that reason.

2.4.9 Are there examples of parking standards being a primary constraint on the competitiveness of outer London in attracting sustainable development in the face of competition from other areas in the south-east of England? If so, would further policy guidance improve competitiveness with neighbouring areas in attracting sustainable development, which areas of existing policy should it address (notably, further guidance on Policy 6.13 Ec & Ed) and what form should it take?

Parking standards acting as a primary constraint on the competitive of outer west London is not universal. Some Boroughs highlighted examples of parking standards being a primary constraint on competitiveness of Outer West London.

Brent recognised that this is an issue to consider but within Brent, have not experienced parking standards as a primary constraint on competitiveness in attracting sustainable development.

There are some examples in Hounslow of parking standards constraining development for examples GSK don't occupy all of the existing buildings at the HQ in Hounslow because of a lack of parking and so retain a site in Hillingdon but the examples are the exception. Hounslow has a large number of big distribution companies that are less labour intensive and so demands for parking are not as great.

Ealing do not have any evidence of this and added that developers appear willing to come to west London under current parking policies and standards. Ealing ask whether the OLC have any evidence of this?

2.4.10 In the case of residential parking standards is further policy guidance required to ensure that in areas of on-street parking stress new developments provide off-street parking and appropriate safeguards so as limit exacerbation of existing issues?

Existing guidance on residential parking standards and policy provides sufficient guidance on this issue.

Ealing commented that the whole of Ealing borough is considered to be under on-street parking stress.

2. Housing Density

3.3.1 Does the draft SPG (background paper 3.1 to this agenda) make it sufficiently clear that the intent of Policy 3.4 is to optimise the potential of individual sites taking into account a range of factors nb SPG paras 1.3.4 – 1.3.8?

The Boroughs consider that the draft SPG makes clear the policy seeks to optimise rather than maximise housing potential. It should be noted that detailed and overly complex SPG and is not considered to be helpful.

The density matrix on sustainable residential quality is endorsed and clear and concise guidance on mixed-use schemes and other development scenarios is generally welcomed. Hillingdon objected to the inclusion of the density matrix in the London Plan on the basis that housing density was a local matter, and this remains a concern.

Notwithstanding this objection, Boroughs support the clarification in paragraph 1.3.4 that policy 3.4 seeks to optimise housing potential.

Ealing raised at the OLC meeting that there should be flexibility for boroughs in their particular localities relating to the higher and lower densities. Hillingdon echoed the importance of flexibility.

Hillingdon added that the statement in 1.3.8 which states that '...the interpretation of broad density policy outlined in the London plan and expressed in the DPDs is very properly a local matter' is also supported.

Hounslow questioned at the meeting how relevant the SPG is and raised that Hounslow consider boroughs to be best placed to interpret the policies.

3.3.2 Is the range of factors which have to be taken into account in coming to a view on an appropriate density too extensive for practical Development Control purposes? If yes, how should it be simplified, bearing in mind the strategic requirement to optimise rather than maximise development potential on individual sites?

Boroughs do not consider the range of factors to be too extensive.

Ealing support an approach which gives guidance to LPAs on factors relating to housing density which they may wish to consider but does not go further than the adopted London Plan 2011 in specifying how specific densities should be determined at given sites.

Hillingdon have provided the following comments:

- In accordance with the statement in paragraph 1.3.8 that the range of factors that will be taken into account within the framework set by policy 3.4 will be a local matter. The SPD should state that the range of factors listed in the SPG are merely suggestions.
- It is suggested that in addition to the factors listed in the SPG, the supply of particular dwelling types should be taken into account, that boroughs should not be required to build more one and two bed flats where there is an oversupply of this accommodation in order to meet density targets.
- The first sentence of paragraph 1.3.11 should be changed to state that the range of factors affecting density will vary according to the specific circumstances in each borough.

- A key concern of the Mayor's policy on housing density has been that it does not take account of differences between inner and outer London. In general terms, the SPG should state that high densities are likely to be less appropriate in Outer London.

3.3.3 Conversely, are there other, London Plan compliant factors which should be taken into account to provide greater flexibility in coming to a view on an appropriate density for a development?

The issue of development on garden land is a concern raised by Hillingdon, particularly where one or more larger family homes are demolished to make way for high-density flatted development, which result in extensive building and car parking areas across virtually the entire site.

It is noted that the SPG could make a connection between policy 3.4 and 3.5.

3.3.4 The Plan defines density in terms of net residential site area and expresses this both as dwellings and habitable rooms per hectare. The Plan (and SPG) also notes that in certain circumstances floorspace can usefully replace habitable rooms as a density measure. Are there other density measures (which can be correlated with the Plan's policies) which could usefully be included in the SPG e.g. population/hectare and if yes, how should guidance on use of these be framed?

The flexibility to use floorspace to measure density in certain circumstances is welcomed but Boroughs didn't put forward other density measures to be included thereby suggesting that density measures defined in the Plan are sufficient.

Hounslow commented that the introduction of additional measures is not necessary and it is noted that additional factors are likely to make the policy too complex.

The main issue is to ensure that there are no perverse incentives against larger family homes being delivered.

3.3.5 A central proposition of the policy is that in broad terms higher density development is more suitable for smaller households and lower density development for larger households. Do SPG paras 1.3.9 – 1.3.16 express this (and departures from it) adequately?

The proposition put forward in paragraphs 1.3.11 and 1.3.12 is generally supported.

Brent added that it is considered inappropriate for families to be accommodated on the upper floors of high rise development.

Hillingdon commented that the statement in paragraph 1.3.12 '*...higher densities... will be more suitable for households without children and will require less open space and play provision*' is not supported and should be removed. Hillingdon is of the view that all housing growth generates a need for open space and will seek to meet this by appropriate means.

3.3.6 Does the SPG provide adequate guidance on using the Public Transport Accessibility (PTAL) score in coming to a view on an appropriate density for a development?

The use of PTAL ratings to determine densities is established and understood. Boroughs are satisfied that the SPG provides adequate guidance.

3.3.7 Does the SPG provide adequate guidance and flexibility in taking into account the following factors:

- setting?

Hillingdon notes the requirement to define the Mayor's density zones of Central, Urban and Suburban areas as part of the LDF process. This requirement has not been raised during the course of Hillingdon's discussions with the GLA.

- large and small site development?

No specific comments on this issue.

- approaches to density on the borders of a development/relationship with surrounding areas?

Whilst the principle of avoiding high density development spreading in an uncontrolled way into lower density development is welcomed, the suggestion that these 'place shielding' areas be defined in LDF's would be onerous and should generally be taken into account at the planning application stage.

- density development in areas with an indeterminate character?

No specific comments on this issue.

- approaches to development proposals above or below the appropriate density ranges?

Hillingdon commented in relation to their borough, which is generally characterised by areas of low density suburban development, that very high densities are unlikely to be appropriate.

Hillingdon added that PPS3 no longer defines a minimum density (which was previously 30dph) and there are likely to be circumstances where the minimum London Plan densities (of 35dph) are not met. Hillingdon considers that the SPG should make clear that these specific circumstances will arise and will be acceptable where material considerations and local and national policies outweigh the provisions of the London Plan.

Ealing raised at the OLC meeting that with good design high quality higher density schemes can be produced to the benefit of the development, particularly in high PTAL areas.

- density and social/environmental infrastructure provision (bearing in mind that this will be addressed in greater detail in the neighbourhoods SPG)?

The provision of appropriate social infrastructure is key to achieving sustainable development. There may be circumstances where the provision of social infrastructure on a development site is sufficient to justify densities outside of the Mayor's guidelines.

- housing density in mixed use developments?

Boroughs support the need to consider very carefully the 'massing' effect of mixed use developments, where housing density calculations have in the past resulted in development that is totally out of scale with its context.

- density and design (bearing in mind that elsewhere in this SPG the Mayor's new approach to design is dealt with specifically)?

It is welcomed that this current London Plan goes further than the previous Plan in linking density and design.

3.38 The Plan commits the Mayor to providing guidance on the relationship between its housing density and parking policies. An example of how this could be done is shown

below. Does the table offer sufficient flexibility to outer London boroughs or does it add unnecessary detail and therefore more prescriptiveness?

The proposed parking standards are viewed by some boroughs as too prescriptive and do not reflect the broad density ranges identified in Table 3.2. Boroughs will seek to define its own parking standards through the production of its Development Management DPD. An alternative view is that the table offers sufficient flexibility without being too prescriptive.

Hillingdon commented that paragraph 1.3.39 implies that parking is only essential if it is for servicing or disabled people. In parts of Hillingdon, the car is often a necessity in order to travel to work and residential schemes need to incorporate convenient and adequate levels of off street parking.

Alternatively, could a broader approach be taken, fostering a more site specific approach to determining appropriate levels of car parking. This might recognise the Mayor and local planning authorities' ability to have regard for other material considerations when determining appropriate levels of car parking. This could retain the table of maximum standards set out in the Plan but indicate in supporting text where a higher provision might be acceptable. Would this approach be more appropriate?

3.39 The SPG covers a range of other factors which can help to optimise the relationship between transport and land use (SPG paras 1.3.41 – 43). Are there any other factors which should be taken into account?

Hillingdon raised that the comments in para 1.3.41 with regard to car free housing are not appropriate in Hillingdon.

3. The Outer London and Government Office Dispersal

The OLC's questions relating to Outer London and Government Office Dispersal relate to Policy 2.7 of the London Plan. The OLC advised at their meeting in public that the government is debating dispersing its function from central London to lower-cost locations and therefore will not be exploring this issue further at the moment.

The boroughs have no detailed comments on the methodology applied to the Green Review objectives of decentralising government properties and operations in London, but it seems clear that transport accessibility will be a central consideration. Office development, as a consequence of dispersal from central London, should be located in the first instance in opportunity areas and particular town centres. Those Outer London Development centres which are also town centres and consequently have good public transport accessibility are ideal locations for new office development.

4. Strategic Outer London Development Centres

1. How can the objectives for each of the SOLDCs identified in the London Plan be realised?

The Mayor should support the boroughs as they bring forward their own strategies for these areas in their LDFs and other Council strategies (e.g. for culture or tourism). The specifics of implementation for individual areas and themes will depend very much on the area of specialism that is identified.

2. What are the key tools/drivers for implementation? (eg planning policies, planning frameworks, development, transport, investment, skills, promotion, BIDs etc)

The Mayor should work with the boroughs to bring forward a strategic infrastructure plan in support of the London Plan to help identify major infrastructure required to support the development of the SOLDCs.

Planning frameworks are prerequisites to the effective implementation to the effective implementation of SOLDCs. These already exist at some sites and where they do a fund for competitive bids from different SOLDCs is likely to have the greatest material effect in unblocking particular obstacles or achieving project milestones.

Ealing raised at the meeting that north-south transport connectivity improvements are needed for the full benefits of the SOLDC at Park Royal to be realised.

3. What is the current state of progress with implementation of the London Plan SOLDCs?

In relation to Ealing's SOLDCs, Park Royal, it continues to perform well as a location for industry within London given the current economic context.

4. What more needs to be done?

Ealing commented that there are potential challenges and opportunities for Park Royal if the HS2 terminus at Old Oak Common proceeds as currently envisaged. Given the cross-boundary nature of Park Royal, the HS2 project will likely necessitate an update to the OAPF.

Hounslow feel that there is limited benefit to be gained by describing Hounslow as having a specialised strength for logistics and considers that no more should be done to promote this.

5. What are the key criteria for identification of new SOLDCs?

It is not considered by all Boroughs that new SOLDCs should be identified.

Ealing raise that the identification of potential new SOLDCs is dependent not just on areas of potential strength in a particular economic or cultural area but in large part on the accessibility of any given area of outer London. Adding that realistically, new SOLDCs will tend to be identified where there is or is scheduled to be an improvement in transport infrastructure and communications.

6. London Plan states that the list of potential SOLDCs is not exhaustive. Are there any further locations that could be considered in light of the criteria?

It is understood by Boroughs that this list is not exhaustive and Boroughs would not want to miss opportunities for clustering around an existing business location with specialist strengths, however, concerns are raised by the Boroughs about artificially presenting an area as only willing to accept a particular business sector.

Brent commented that:

- Although strategic functions have been identified for individual SOLDCs, it is obvious that development should not be confined to the roles ascribed but rather, the potential for synergy between the specialist role and other functions should be recognised;
- It is important that , for the SOLDCs to compete for inward investment with both central London and centres beyond the London boundary, that there has to be a focus on improving accessibility, particularly by public transport and with an emphasis on improving orbital

accessibility. This is of particular importance for those centres which are close to Areas of Regeneration which are defined by high levels of deprivation; and

- Particularly in a time of economic downturn, it is important that if foci for economic growth are to be provided in outer London, as is the intention of designating SOLDCs, then these foci should not be diluted by the designation of too many. It is Brent's view that no further SOLDCs should be identified unless there are very exceptional reasons for doing so.

With the Crossrail development, Stockley Park and Hayes in Hillingdon will offer strategic office locations close to Heathrow.

5. Outer Town Centre Renewal Initiatives

The OLC posed that stakeholders use the range of policies outlined in section 6 of Paper 1.1 as the basis for making recommendations on the Supplementary Guidance. Boroughs were asked to provide recommendation as appropriate. In response to this Boroughs made the following comments outlined in the below paragraphs.

The Boroughs commented the OLC should recognise that town centres are often quite different in terms of the services and facilities that they offer and the issues that they face. In light of this, it may be more appropriate for boroughs to prepare local planning policy guidance through their LDF's or through their own specific supplementary guidance.

The SPG could make the distinction between the categories of town centres and how policies would apply differently to different town centres. What is the angle for the categories of town centres?

The SPG could amplify about the delivery of sustainable transport improvements to town centres' accessibility and attractiveness, particularly in the context of the parking issues.

Ealing support an approach which provides ideas to LPAs on factor relating to renewal schemes but doesn't go further than the adopted London Plan 2011 in specifying how given schemes should be designed and implemented. Ealing raised at the OLC meeting that they want to extend street scaping to create environment competitiveness and that in order to do this more money is needed.

Hillingdon raised that their borough is embarking on a new initiative aimed at regenerating its town centres and it will initially focus on Hayes, Ruislip manor and Northwood Hills. It is working in partnership with the local business community to take a 'total approach' to town centre improvements that will see public realm enhancements, (such as improved pavements and streets; removal of street clutter; provision of cycle facilities; improved parking and servicing arrangements; convenient bus stops etc); shop front improvements through a grant scheme; the offer of retail apprenticeships; and a visual merchandising scheme, to improve the attractiveness of the shop to customers.

Hillingdon is also aware that the loss of key businesses in town centres or the relocation of these to more peripheral locations, can lead to an overall decline for the centre. Mayoral support would be very much welcomed to find ways of retaining such businesses in the interests of the wider community.

Hounslow commented that a flexible approach needs to be taken to develop town centres and that there needs to be recognition of what local people need to develop the night-time economy.

What is very much valued and appreciated from the Boroughs is the practical assistance, support and collaborative working that the Mayor can offer for example through the

Outer London Fund scheme to enable schemes such as those described above to be able to be realised.

Lastly, the OLC asked boroughs at the meeting in public whether more could be done to work with different public sector services collaboratively and to draw them back into town centres and queried whether this was potentially an area of missed opportunity. It was agreed that this is an area of work that OLC could consider. It was highlighting that the single agency approach isn't working and suggested that the GLA take a proactive approach to lead the discussion on this issue.