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Dear Mayor

Response from the London Borough of Hounslow to the public consultations on:

- **A City for all Londoners**
- **City in the West**

Thank you for the opportunity to make comment on these two documents. This single response by Hounslow Council addresses both these related documents – with a particular aim to influence the content of the new London Plan.

1. A City for All Londoners presents a useful development of the Mayor of London's manifesto, this touches on the direction to be taken in the future review of all seven statutory strategies and GLA duties. Most directly, this addresses the next version of the Spatial Development Strategy for London (London Plan). The City in the West document focuses on the physical planning and transportation regeneration aspects for west of London, and focuses on taking forward the development of strategy already embedded in the adopted London Plan (2015).
2. ***Hounslow Council ask that these representations to be taken into account in the preparation of the full draft London Plan – anticipated for public consultation in Autumn 2017. We would welcome further opportunity to discuss the issues raised in further detail as the draft policies are progressed.***
3. ***Hounslow Council is itself currently preparing two area focussed reviews of the LB Hounslow Local Plan (2015), addressing areas where Opportunity Areas have been / are being designated and significant change is proposed. We anticipate draft plan consultations from Spring 2017 onward. Clearly it will be important to maintain close liaison during the preparation of the Local Plan review and draft London Plan.***
4. The opening text of City for All Londoners makes the point that it 'should be read as a whole' because of the deliberate approach to make connections between issues rather than deal with them in a 'silo' way under topic headings; this response should be read in the same way. Our responses below are presented under the headings used in the document, made in response at time that an issue occurs, for example under the heading of

Accommodating Growth, and we have only repeated the points again to a minimum under other headings such as Housing or Transport. We start with some opening points about the documents.

Overall ambition and scope of A City for All Londoners

5. The timing, challenges and the scope of the GLA group and the Mayor of London's unique position in the English planning system present a very unusual opportunity to take a fresh integrated (rather than silo) approach and undertake a thorough review, rather than a roll out of 'another' iteration of the established London Plan and NPPF approach. ***We welcome that the Mayor presents ambition to grasp this opportunity:***
 - wanting to "accommodate as much growth as possible within London" by promoting and securing the benefits of 'Good Growth' and use of infrastructure investment to unlock new untapped potential;
 - increasing affordable housing supply;
 - maintaining London's global competitiveness on all fronts, including strategic infrastructure investment and cultural offer;
 - signalling a bold suite of transport, building and fresh environmental strategies to achieve zero carbon by 2050, including major investment, off-setting, local energy and simple measures such as 'Healthy Streets' prioritized for walking and cycling; and
 - striving for a City for All as a quality place to live and work, and respecting heritage, diversity of place and peoples – in all respects.
6. One concern about the approach outlined is that the competitor world cities mentioned with "slick modernity" with a high quality of infrastructure investment are 'new places' like Hong Kong and Singapore. The need and value of respecting London's heritage assets and communities is clearly acknowledged in the document – however, ***it would be more constructive to be researching and quoting exemplars of growth, change and modernisation in other long established world cities. Both in terms of the outcomes achieved but also the planning processes and policies used to deliver desired modernisation.***

Accommodating Growth

7. Directly related to the last point above, the documents (and subsequent statements) suggest that all London's growth needs can be accommodated in the GLA area and without touching Metropolitan Green Belt (MGB) and other 'designated green spaces'. ***Hounslow Council is not convinced that this is desirable or achievable in full*** and if the case is ***proven***. The engagement with the Wider South East region in these issues is welcome and will need to be developed across the whole and in more localised areas (see 15 below in relation to joint investment corridors).
8. In terms of the question of whether any use is needed of MGB, this Council has first fully embraced the need to intensify development, drive regeneration and new use of under-used /redundant land, increase housing delivery and adopt Housing Zones and promote new Opportunity Areas. However, a simple and absolute refusal to review the purpose and multi-functional benefits of MGB sites throws undue pressure onto areas that are already more intensely developed. ***Moreover, the phrasing used in the document fails to mention Metropolitan Open Land (MOL). In theory, MOL has the same level of development plan policy protection as MGB but in reality it is:***
 - ***MOL often more 'highly valued' than MGB in terms of providing strategic urban open space, public access and other multi-functional benefits;***

- ***MOL is more vulnerable than MGB as it does not have the same level of recognition in the NPPF and sites are generally more accessible (and 'developable') and closer to points of need.***
9. Clearly, the new London SHLAA process must first ensure that all boroughs are 'pulling their weight' in recycling brownfield land, but we consider ***that some intelligent review of the multi-functional benefits of MGB within the GLA area (about 5% of the total in the WSE)¹ will be an essential to achieving balanced, sustainable development and 'Good Growth'.*** Councils throughout the Wider South East (WSE) are *currently* reviewing their MGB and having to release sites in their Local Plans. The Mayor has a leadership role in ensuring a 'fair' and reasonable strategic approach in undertaken to MGB across the WSE and by London boroughs. ***It is important to note that significant opportunity sites also exist in the MGB within the GLA boundary.***
 10. ***London boroughs will be under pressure to reviewing MGB using the rather unhelpful NPPF 'purposes' tests as a start point and will possibly look to re-designate MGB to MOL or even release sites in accordance with a methodology of their creation. Given this and if a pan-London strategic basis for review of MGB is not given at a strategic level by the Mayor, there could be 'conformity' and inconsistency issues not just for Local Plans but also the London Plan. It will not be possible to simply ignore that authorities through-out the WSE are reviewing MGB.***
 11. Both documents champion the case for new transport and other infrastructure investment in unlocking development potential. ***The Council fully support this approach.***
 12. ***Hounslow Council is promoting a Southern Rail Access Route into Heathrow Airport (see City in the West diagram pages 4-5) which is needed to improve surface access to the airport and improve air quality, regardless of whether or not a third runway is eventually built at Heathrow.***
 13. ***We are also working with the GLA group to promote two further rail schemes to unlock development potential in the new Great West Corridor Opportunity Area :***
 - a. ***Southall to Brentford link or 'Skylink' – utilising an existing freight line to access the Golden Mile (A4 Great West Road) and surrounding area for housing and employment regeneration. A GRIP 3 study has just been financed by LBH and this could be simply and speedily implemented. (See City in the West – diagram at pages 4-5)***
 - b. ***'Golden Arrow' running London Overground services on the Hounslow Loop to Old Oak and Park Royal – with a new station in East Brentford off Lionel Road. The schematic indication of this (City in the West pp 4-5) should be made more explicit in support of this scheme over other uses of potential new line capacity.***
 14. Communicating the 'case for development' to local communities is always a challenge and the ***concept of 'Good Growth' is welcomed as a simple articulation of some of the potential benefits.*** However, this concept could be taken further by ***ensuring that 'Good Growth' is always within the context of a balanced plan-led strategy*** and the concept is not allowed to become de-based and used on an 'ad hoc' basis to support any development per sec. (Likewise, pointing to exemplars of places 'we would like to be more like' can be helpful, but the exemplar places and societies need to be relevant.)
 15. A City for All Londoners addresses the idea of "joint investment corridors" that stretch beyond London's borders, and the City in the West refers to the established London Plan recognition of the 'Western Wedge' driving west out through west London into the M40/4/3 corridor. Three points are made in relation to this:

¹ LSE research and others

- a. The documents too bluntly refer to a model of the city as the CAZ, with radial routes for commuters extending out through outer London and into the WSE beyond. This results in longer distance one-way commuting flows becoming the response to the need for growth, but ultimately unsustainable and uncondusive to a high quality of life. ***A more subtle approach is required, identify the CAZ as part of a poly-centric city region, with a network of routes (orbital, radial and other movements too) serving mixed use urban centres offering employment and intensified residential areas located on that public transport network.*** This means each centre needs to be planned as a balanced 'place' with robust measures to protect appropriate supply of employment, services and other lower-value uses as well as housing growth. Suburban centres such as Feltham and Hounslow and employment growth areas on the Golden Mile all have a place in this model together with improved transport links.
- b. This balanced management of each 'place' will firstly be a Local Plan function, but the London Plan must provide the balanced and robust strategic policy basis for this. The effect of government and market mechanisms, the NPPF policies on housing and the existing London Plan, is to place too much emphasis on annual housing targets and delivery, at the expense of the necessary balance of employment land, protection of open spaces and other uses. ***The Mayor has a unique opportunity to ensure a better balance of consideration is achieved across London with less obsession with a rather blunt 'dwelling per annum' targets.***
- c. By extension, this continues into the WSE. Employment in outer west London is mixed in nature and economic performance has always remained high; capacity must be maintained / increased. Throughout the Western Wedge the focus of the functional economic market area (FEMA) is Heathrow Airport – which straddles the GLA boundary. Hounslow Council has led work to cooperate with 13 neighbouring LPAs and LEPs to work in this area which may face great change depending on Government's decision. The new London Plan and preparation of evidence base must engage with the potential impacts of expansion at Heathrow or Gatwick. City for All Londoners contains only a one sentence reference to this critical issue to the future of west of London and Western Wedge, and indeed CAZ.

16. The Duty to Cooperate is particularly challenging for outer London Boroughs that are required to plan in 'general conformity' with the SDS and to achieve meaningful and continuous collaborative and joint working with several different counties and district councils as well as London boroughs and GLA. This should address both cross boundary and strategic issues. The engagement of the GLA with the representative organisations of councils throughout the WSE is welcome (London Councils, SECC, EEI&GG) – ***but GLA group support is also required so that boroughs can achieve more locally focussed and meaningful cooperation with councils and LEPs in their own FEMA.*** Hounslow have initiated the creation of the Heathrow Strategic Planning Group with this end in mind, the bodies have differing views about whether a third runway should be built at Heathrow, but agree on the need for collaborative and joint strategic working to achieve mutual objectives.

Housing

17. The housing challenge is enormous and the document points to a series of initiatives and policies including London Living Rent and a new graduated stair-case increase in targets for new affordable homes. ***These initiatives are welcomed and the council will wish to***

engage in the detail consultation responses in due course as these evolve. The council has pioneered various new forms of affordable housing.

18. Having stressed the importance of housing, and further to 15 b. above, while pursuing the delivery of new housing opportunities and dealing with the market, ***it will be essential to ensure properly balanced and robust management of land and buildings for other essential uses in order to reduce the need to long distance tidal commuting and to achieve Good Growth, neighbourhoods and 'place making'.***
19. ***A more nuanced approach with a shift in emphasis from 'dwelling per annum' housing targets to focus more on affordable housing output or different forms of habitable bed spaces to be achieved could provide a more meaningful tool.***

Economy

20. The document correctly focuses on the value of cultural, heritage and other attributes as part of London's offer as a global city, and puts emphasis on the need to improve environmental quality, liveability and upgrade transport and strategic infrastructure to world class level as part of this. However, as stated above, ***it is important to look at a wider range of exemplars of outcome and planning processes, and as necessary, fundamentally review the existing approaches and current London Plan.***
21. While the document contains some recognition of the importance of outer London to the economy and 5.7m jobs and £120B of exports from the capital, there is concern that the role of outer London is underplayed. Furthermore, outer London and the WSE it is not simply a place to relocate for the lower value employment space to from the CAZ, but a mixture of space is needed in all areas as part of creating balanced places and reducing the need for long commutes.

Environment, Transport and Public Space

22. The aspiration to put London at the cutting edge of environmental policy and to prepare a multi-functional environmental strategy in 2017 is welcomed. Poor air quality and in some locations, noise, are significant challenges in the borough. ***The principles of: making the city healthy, resilient and fair; and resource efficient, low carbon and green all appear appropriate. Similarly, so does the interest in carbon off-setting, local energy and focus on net-zero-energy retrofitting of homes.*** The borough has a large stock of pre-1918 and mid-C20 suburban housing stock in need of retro-fitting and more sustainable occupation, and its neighbourhoods are in a range of very different socio-economic circumstances. ***Such programs of work will need strategic direction for maximum effectiveness and boroughs should drive this.*** There will not be a 'one-size-fits-all' set of criteria for prioritisation for the whole of London.
23. In relation to 'higher density' City for All Londoners promotes a more restrictive approach to tall buildings, to 'only be permitted' where they add value in terms the skyline and local streetscape / environment. ***It should also be recognised that tall building can achieve market impact and scale that can unlock new investment (in for example new transport infrastructure) and achieve wider regeneration and community benefits. This also needs to be taken into account.***
24. The proposed expansion of the ULEZ to just inside the North and South Circular, in 2019, could have significant displacement effects and create hotspots at the edges; this could have significant impacts in parts of the borough, including impact on areas where housing densification is being promoted. ***This will require careful coordination with boroughs on both sides of the new ULEZ perimeter.***

25. ***Many of the issues raised go to supporting the liveability of the city and quality of life, including: 'Healthy Streets', stricter approach to tall buildings, working towards a zero carbon city in 2050, design, heritage, 'Inclusive neighbourhoods' and 'branding' of London's unique offer.***

City for All

26. Again, the values and measures raised in this section link with the more physical measures addressed under the previous headings, which together will contribute to improving services, fairness, opportunity and quality of life.

Further specific responses to City in the West

27. The City in the West document includes several schematic maps. The Council is concerned about some omissions, inconsistencies between the maps and the origins of some of the 'numbers' and definitions of area shown. Specifically:
- a. The first map 'City in the West Numbers' (pages 4-5) shows the Southern Rail Access rail link to Heathrow from Feltham,
 - b. the 'Skyline' from Southall to Great West Road (Golden Mile and emerging Great West Corridor Opportunity Area); and
 - c. the London Overground link from the Golden Mile to Old Oak & Park Royal.

These are all welcome and fully supported by the Council (see 13 above).

28. However, none of these do appear on the 'Wider Context' map (pages 6-7) (although other new proposals such as Crossrail 2, HS2 and Bakerloo Line Ext do appear), and only the 'Skyline' appears on the and 'City in the West' map (pages 8-9).
29. The mapping also shows the Heathrow Opportunity Area. This appears to be the first time this has been mapped in a consultation document (although a written reference first appeared in the London Plan 2004). The origin of this mapping interpretation is unknown, furthermore, this indicates that the HOA has an area of 734ha. This does not correspond with the description in the London Plan Table A1.1 where an area of 700ha is given – with the same housing /jobs output.
30. ***Hounslow Council have strong concerns to this description; and request that GLA engage with the borough to clarify and develop the Hounslow part of the designation as a priority. The Council will be progressing the designation of both OAs in the Local Plan reviews, and look forward to working with the GLA bodies and neighbouring authorities on this .***
31. The first text page quotes growth of tech city businesses in Croydon, it also says that central London and Canary Wharf will continue to be the largest concentration of jobs and growth. ***But reflecting the stress placed above seeking a more poly-centric approach to planning for economy and employment across all of London (and the WSE), the text should equally highlight other regionally significant economic attributes of places in the area, such as the digital and media sector businesses in Hounslow (Golden Mile) which is recognised in the London Plan (2015) as an Outer London Development Centre. Similarly, and large multi-national companies located along the gateway to London from Heathrow and the Western Wedge (e.g. the Golden Mile and campus parks in Chiswick and Bedfont) or the airport related high value logistics sector within the Heathrow FEMA. These are all large and consistent centres of high growth and decisions in the near future about airport expansion could have significant***

impacts on the spatial planning of the City in the West, economy and employment that need to be understood and contingency options considered. considered.

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Yours faithfully

for

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