

# SHAPING LONDON'S FUTURE - RESPONSE TO CONSULTATION ON THE MAYOR'S LONDON PLAN, TRANSPORT STRATEGY AND ECONOMIC DEVELOPMENT STRATEGY.

<b>Cabinet Member</b>	Councillor Keith Burrows
<b>Cabinet Portfolio</b>	Planning and Transportation
<b>Officer Contact</b>	Ged Lawrenson/Jales Tippell
<b>Papers with report</b>	Appendix 1 Response to consultation on the 'The London Plan, Consultation Draft Replacement Plan' Appendix 2 Key Provisions and Issues in the 'Mayor's Transport Strategy Public Draft' Appendix 3 Response to consultation on the 'Mayor's Transport Strategy Public Draft' Appendix 4 Response to consultation on 'Rising to the Challenge – the Mayor's Economic Development Strategy for Greater London, Public Consultation Draft (Oct 2009)'

## HEADLINE INFORMATION

<b>Purpose of report</b>	This report advises Members of the key provisions of three interlinked strategies published for consultation by the Mayor of London in October 2009, namely the London Plan, Consultation draft replacement plan; the Mayor's Transport Strategy, Public Draft; and the Mayor's Economic Development Strategy. The report assesses the implications for Hillingdon of these strategies and recommends that Members agree the comments in response to consultation for submission to the Mayor of London.
<b>Contribution to our plans and strategies</b>	Sustainable Community Strategy Local Development Framework Transport Strategy Economic Development Strategy Housing Strategy
<b>Financial Cost</b>	There are no direct financial implications in responding to the Mayor's consultation documents.
<b>Relevant Policy Overview Committee</b>	Residents' and Environmental Services Policy and Overview Committee.
<b>Ward(s) affected</b>	All

## **RECOMMENDATIONS**

### **That Cabinet:-**

- 1. Notes the contents of this report regarding the key provisions of the Mayor's Draft Replacement London Plan, Transport Strategy Public Draft and draft Economic Development Strategy.**
- 2. Endorses the response to the Mayor of London as set out in paragraphs 3, 12-14, 16-18 and 23 below and also in Appendices 1, 3 and 4 to this report, with any further amendments as agreed by the Director of Planning and Community Services in consultation with the Cabinet Member for Planning and Transportation and any other relevant Cabinet Members.**

## **INFORMATION**

### **Reasons for recommendation**

Consideration of the implications of these strategies for Hillingdon and a response to the Mayor of London will enable the council's strategic planning, transport and economic interests to be safeguarded and developed.

### **Alternative options considered / risk management**

The Cabinet may influence the Mayor of London's proposals by:

1. agreeing the response in full or in part or
2. making any amendments to the response that are considered appropriate.

Alternatively the Cabinet may make no response to the Mayor of London's proposals. This would not ensure that the borough's interests are raised with the Mayor.

### **Comments of Policy Overview Committee(s)**

None.

### **Supporting Information**

## **SHAPING LONDON'S FUTURE**

1. On 12th October 2009, the Mayor of London published "The London Plan – Spatial Development Strategy for Greater London, public consultation on draft replacement plan" (hereafter referred to as the Revised Plan). The Revised Plan forms a trio of interlinked strategies entitled "Shaping London's Future". These also include the Mayor's Transport Strategy, Public Draft and the Mayor's Economic Development Strategy. The closing date for responding to consultation on all three strategies is 12th January 2010.
2. This report considers each document in turn; highlights the key provisions; considers the implications for Hillingdon, including interrelationships between the strategies; and provides suggested responses. These responses are set out in Appendices 1, 3 and 4 of the report. Subject to the approval by Cabinet, these will comprise the formal response to the Mayor of London. The council's responses will also provide the basis

of an input to the London Councils' response to the strategies, particularly where the council wishes to reinforce an issue of local importance to the Mayor of London. They will also contribute to the response of the West London Alliance.

3. The responses included in this report and the appendices build on the full Council motion that was approved at its meeting on 5 November, which resolved:

“That this Council notes the Mayor of London’s recently published consultation documents on the London Plan, Transport strategy and Economic Development strategy. This Council welcomes the focus given by the Mayor on a wide range of issues concerning Hillingdon residents, in particular the rejection of the Third Runway at Heathrow and others including:

- The ability to provide greater protection against inappropriate development of gardens
- The importance of the car in outer London
- The need to support our town centres

The Council further notes the Cabinet’s success in winning support from the Outer London Commission on a number of key points, which are now incorporated into the future plans. Council asks the Cabinet to continue dialogue with all relevant parties to build upon these themes and in particular the discussions about

- Two new Express north to south bus routes
- Appropriate funding for both the social infrastructure required to support the expected growth and for the regional theatre to be sited within the revised Uxbridge town centre.”

4. The consultation on the Revised London Plan is a formal stage in the replacement process. The next formal stage of the plan is an examination in public led by an independent panel, which is likely to be held in the summer/autumn of 2010. Following the panel’s report, the Mayor will decide which of the suggested changes to accept and he will send a revised Plan to the Government Office for London with a formal notice of his intention to publish the Plan. If the government do not direct any changes to be made, the Plan is then formally published. Unlike the Revised London Plan, the Mayor’s draft Transport Strategy and draft Economic Development Strategy will not undergo any formal stages before being finalised. These two documents are likely to be finalised in the spring of 2010 and will supercede the previous relevant versions.

## **BACKGROUND**

### Previous consultation on the Mayor’s London Plan

5. At its meeting in June 2009, the Cabinet previously considered the Mayor’s initial consultation on the review of the London Plan: A New Plan for London (April 2009) and responded to the Mayor directly and also with the London Assembly and Functional Bodies. In commenting on the Revised Plan, this report considers whether significant comments have been reflected in it. Unlike the earlier consultation, responses to consultation on the revised London Plan are sought on the Plan as a whole and not to specific questions. The revised Plan can be accessed at: [www.london.gov.uk/shaping-london/london-plan/docs/london-plan.pdf](http://www.london.gov.uk/shaping-london/london-plan/docs/london-plan.pdf)

6. In commenting on the Proposals for the Mayor's London Plan in June this year, the Cabinet recommended that officers work with the GLA to ensure that key aspects of strategic planning reflected Hillingdon's perspective. These were listed as:

- a) support the desire to retain and improve the sense of place and character of our established town centres and suburbs
- b) emphasise improvements to town centre public realm to improve the attractiveness for both residents and businesses
- c) improve transport capacity between north and south of the borough, including the introduction of more express bus routes such as the 607
- d) ensure considerations other than density and scale of development are taken into account, with more emphasis on the ratio of intermediate housing and elderly downsizing as demonstrated by the RAF West Ruislip planning application,
- e) ensure parking standards reflect the importance of the car for people and the need to recognise the parking standards of planning authorities that border Hillingdon and which are outside the Regional planning framework
- f) recognise the value of gardens and the 10% rule to restrict the proportion of flatted developments in residential areas.

7. In addition to these particular issues, the Cabinet supported the Mayor on key strategic planning matters contained in the emerging London Plan including:

- a) The continued development of corridors of city significance, including the 'western wedge'
- b) Development incorporating green infrastructure and a renewed focus on the delivery of social infrastructure
- c) The more rigorous approach to manage releases of industrial land
- d) A more co-ordinated approach to tourism
- e) The provision of policies on strategic cultural quarters and facilities, together with policies to manage the night-time economy
- f) The provision of a better integrated transport infrastructure to support regeneration in outer London.

8. This report also considers whether other matters of concern raised in June this year have been taken on board by the Mayor of London. In summary these include:

- a) The need for greater recognition in the London Plan of the functioning of West London, including transport, employment, public services, and waste
- b) A more concerted approach by the GLA for measures to improve conditions in Hayes and West Drayton as part of the Heathrow Opportunity Area
- c) Density standards to be tempered by local character
- d) More guidance for the Heathrow area, including the on-going role of Heathrow airport in the London economy
- e) Support for development of our town centres
- f) Recognition that the 2012 legacy should apply to Hillingdon.

#### Previous consultation on the Mayor's Transport Strategy

9. In July 2009, the council responded to the Mayor of London's Consultation on his Transport Strategy, Statement of Intent published for initial consultation with the London Assembly and GLA Group. The key issues raised at that time related to the following matters:

- a) Improvements are required to bus services between key destinations in Hillingdon, including an upgrade in its north south public transport service provision, in order to develop a balance between location and (potential) employment within the borough.
- b) Uxbridge faces a number of issues, including lack of good public transport accessibility which is considered to be a major constraint to the sustainable growth of the town; its Bus Station which operates beyond its practical capacity; and it requires faster underground services to central London.
- c) Most of Hillingdon's interchanges, and especially at Uxbridge, West Drayton and Hayes & Harlington, require significant improvements.
- d) There is support for the Mayor's aspiration to improve the quality of the public realm which is particularly important at public transport interchanges.
- e) Hillingdon would support a new High Speed rail project that will reduce the number of short haul flights and also result in a modal shift from car to rail.
- f) Hillingdon is keen to continue developing improved cycle routes and facilities. However the provision of additional dedicated cycle routes along main arterial routes is problematic in Hillingdon, due to environmental constraints, physical road width confinements, loading requirements, parking demand and bus stop requirements.
- g) There is support for the Mayor's aspiration to address climate change.
- h) The Mayor should work towards ensuring that the mandatory legal limits for local air quality pollutants are met.

10. This report considers whether the above matters of concern raised in July this year have been taken on board by the Mayor of London.

#### **'THE LONDON PLAN, CONSULTATION DRAFT REPLACEMENT PLAN'**

11. Appendix 1 of this report includes comments on each chapter of the Revised London Plan, dealing with specific policies in the Plan if these have particular implications for Hillingdon.

12. In summary, officers consider that the following new key policy directions in the Revised Plan should be welcomed and supported:

- The Mayor's objective for a city that delights the senses and the emphasis on achieving the best possible design for new homes
- The greater emphasis on Outer London, promoted by the Outer London Commission, with an Outer London vision, and less prescriptive policy for the West sub-region, enabling the council to develop locally specific strategic policy

- The promotion of the Western Wedge Regional Coordination Corridor with new policies for Strategic Development Centres and Areas for Regeneration
- The narrower focus of a redrawn Heathrow Opportunity Area boundary, with additional guidance on opportunities for growth
- Local determination to address issues such as inequalities in housing design and affordable housing provision, together with a commitment to resist the loss of back gardens
- The proposed minimum internal space standards for new dwellings, which are in general conformity with Hillingdon's Supplementary Planning Guidance.

13. However, officers do have concerns about the following new key policy directions in the Revised Plan and consider that objections should be raised with respect to them:

- Hillingdon's overall target for housing provision in the borough
- The figures for gypsy and traveller pitch provision
- Affordable housing policy that fails to be responsive to the local needs of people requiring access to the housing market
- The revised approach to the density matrix for residential development, whilst referring to the consideration of local character, continues to be a blunt instrument that adds little value to the plan and should be removed
- New strategic policy for Outer London that fails to include mechanisms for councils and sub-regional agencies engaging with out of London counties and boroughs on developing integrated strategic policy
- The revised Plan's continued inclusion of out of date waste targets causing difficulties for Boroughs preparing Joint Waste Development Plan documents
- Car parking standards that continue to be overtly prescriptive for an outer borough with specific car parking requirements for town centres and residential neighbourhoods with poor public transport access.

14. Officers are also concerned about the continued deficiencies and weaknesses of the Plan in respect of:

- Failure to recognise the 2012 legacy in Hillingdon, particularly Heathrow's UK Olympic gateway role
- The lack of recognition of much needed public transport improvements in West London, (considered in more detail below in responses to the Mayor's Transport Strategy) particularly in relation to role of Uxbridge town centre as a public transport interchange
- Revised employment and housing targets for the redrawn Heathrow Opportunity Area that fail to be justified in terms of previous targets, and the failure to recognise that testing of these revised figures need to be carried out
- The omission of policy for the protection of front gardens, including hedges, which are an important feature of suburban Hillingdon
- The need for a realistic assessment of the need for small shops in major retail developments
- The failure to take into account the 'Heathrow effect' on West London, and the economy of London and the UK economy as a whole, of the airports ongoing role
- The absence of borough-specific employment figures
- Climate change policy that fails to integrate with the Code for Sustainable Homes, social housing and the draft London Design Guide, together with

policy for Combined Heat and Power networks that are totally dependant on gas

- The significant omission of consideration of London's other airports and the absence of an aviation strategy for these airports
- The concept of 'cycle super highways' that fail to recognise the potential disbenefits of reduction in road space for buses and other vehicles, difficulties for on-street deliveries, and resultant increased congestion
- Policies for tall buildings that fail to consider impact on privacy and amenity
- The lack of a strategic infrastructure plan
- The failure to include policy that promotes development and regeneration opportunities in the Blue Ribbon Network, such as the Grand Union Canal.

## **MAYOR'S TRANSPORT STRATEGY PUBLIC DRAFT**

15. Appendix 2 of this report includes comments on each chapter of the Mayor's Transport Strategy Public Draft, dealing with specific policies in the Plan if these are have particular implications for Hillingdon. Appendix 3 includes responses to the specific consultation questions on the draft Transport Strategy, if these are have particular implications for Hillingdon.

16. In summary, officers consider that the following new key policy directions in the Mayor's draft Transport Strategy should be welcomed and supported:

- a) The draft Strategy supports a new High Speed rail project that will connect London to Birmingham and onto Scotland, with a possible reduction of 20,000 annual domestic short haul flights.
- b) The draft Strategy uses CO2 reduction as a criterion (albeit the only one) to measure success.
- c) There is continued opposition to further expansion of Heathrow airport by either a third runway or by the operation of mixed mode.
- d) The draft Strategy considers that the interests of existing town and district centres are more important than promoting new super-hubs in Outer London.
- e) The draft Strategy recognises the Grand Union Canal as a 'Blue Ribbon' asset to be developed as a major pedestrian and cycle corridor.
- f) The draft Strategy seeks to focus access to the Dial-a-Ride service specifically to those people who really need the service and actively refers to community transport.

17. However, officers do have concerns about the following new key policy directions in the draft Transport Strategy and consider that objections should be raised with respect to them:

- a) The draft Strategy does not address Hillingdon's 27 congestion hot spots as identified in its Local implementation Plan
- b) The draft Strategy does not address the issue of Uxbridge being an important transport interchange
- c) The draft Strategy does not address the concept of area-wide travel plan partnerships as a useful focus for holistic area-wide land-use and transport planning, scheme preparation and associated future bids for funding
- d) North south orbital public transport (not even shown in any of the figures)

- e) Heathrow has no longer been identified as a super-hub in the Statement of Intent and is indeed treated as a special case of international importance rather than a super-hub of local significance
- f) Lack of capacity of public transport infrastructure to support additional bus and rail services
- g) The Mayor's draft Strategy needs to prioritise improving public transport access to Heathrow and to commit to working with the local authorities and with BAA Heathrow to gain these improvements.

18. Officers are also particularly concerned about the continued deficiencies and weaknesses of the Plan in respect of:

- Addressing Hillingdon's need for a structural orbital public transport provision, addressing its long and narrow orbital shape (i.e. improved north-south links)
- The Revised London Plan designates Hayes as a growth area and Uxbridge as a growth area, industrial development area and centre of higher education without recognising the very much needed supporting transport infrastructure.
- Addressing the requirements for Uxbridge, with respect to a range of measures, so that it is connected directly and attractively with all its neighbouring Metropolitan Town Centres, central London, immediate surroundings and retail catchment area, especially within Buckinghamshire. There is a need to maximise the number of destinations that can be reached by public transport within 20 minutes.
- Addressing the needs of the Hayes – West Drayton economic redevelopment area, which lacks orbital public transport access, especially with the area north of the A40 and the south west.

## **RISING TO THE CHALLENGE – THE MAYOR'S ECONOMIC DEVELOPMENT STRATEGY FOR GREATER LONDON, PUBLIC CONSULTATION DRAFT (OCT 2009)**

19. Appendix 4 of this report contains an assessment of the key provisions of the Mayor's Economic Development Strategy (EDS). It provides comments on 5 objectives of the EDS and also includes general comments on particular elements of the Strategy.

20. Taking each objective in turn the comments can be summarised as follows:

- a) Support for London as a city that excels as a world capital of business, but need to recognise that agencies such as the London Development Agency (LDA), Visit London and Think London should co-ordinate the promotion of inward investment to West London, for example in business parks such as Stockley Park
- b) Endorse measures to improve London's competitive business environment particularly for small and medium enterprises (SMEs), but concern at reduced investment within Business Link and suggest that the LDA should be working more closely with boroughs and be responsive to local need
- c) Welcome London's transition to a low carbon economy, and support measures already demonstrated in Hillingdon such as eco-homes, retro-fitting of energy efficiency measures and zero-carbon car initiatives
- d) Support initiatives for all Londoners to participate in London's economic success, but request that employability measures have regard to the current economic circumstances and local job-market conditions
- e) Express concern that in order to maximise the benefits of the Olympics, the Gateway Heathrow 2012 programme needs to be promoted in order to provide



a local legacy, and that initiatives pioneered by Hillingdon for the regeneration of local town centres could be adopted as a sustainable model for other centres outer London centres.

21. Other comments on the EDS set out in Appendix 4 include:

- The desirability of including reference to the London City Charter, April 2009 in the EDS, in order to demonstrate that the Mayor, Borough Leaders and London Councils work collaboratively for the benefit of Londoners,
- The need for details of how the Mayor proposes to work with neighbouring regions and Regional Development Agencies (RDAs)
- The requirement for data-sharing in areas such as housing needs, council tax and housing benefit/council tax benefit order to provide personalised and joined-up local services for residents.

## **KEY CROSS CUTTING ISSUES**

22. The publication of 3 separate Mayor strategies for Planning, Transport, and Economic Development represent the culmination of over 2 years of work by different sections of the GLA group on behalf of the Mayor. Whilst designed to be self-contained, the strategies in combination are nevertheless intended to shape London's future and therefore need to be complementary, robust and consistent. Any inconsistencies in the strategies would result in uncertainty for Hillingdon developing its approach to strategic planning in the Local Development Framework; preparing a new Transport Strategy; and updating its Economic Development Strategy.

23. The following cross-cutting issues have been identified that cause concern for Hillingdon:

- a) The regeneration promoted in the south of the borough, including the Western Wedge, the Heathrow Opportunity Area, and the Area for Regeneration point to regeneration being focused on the Hayes / West Drayton regeneration corridor. However there is an absence of commensurate improvements in north – south public transport infrastructure to provide sustainable access to new jobs for Hillingdon's residents.
- b) The metropolitan town centre designation of Uxbridge town centre and the implicit assumption that the centre will develop, with RAF Uxbridge, as a multi-functional centre for retail, offices, education, leisure and cultural activities fails to recognise that the existing transport infrastructure is inadequate. Unless the Mayor addresses the issue of Uxbridge being an important public transport interchange, there is likely to be severe constraints on its future growth and prosperity.
- c) The local mismatch between skills and job opportunities in the borough, evidenced by pockets of unemployment and child poverty, requires co-ordinated action across welfare to work, education and skills, transportation, housing, health and others. A more rigorous approach is needed by TfL to remove transport barriers to employment, so that areas of deprivation are sufficiently connected to employment areas by sustainable transport.

- d) The strategies fail to provide sufficient preparation for the economic upturn. The local skills mismatch referred to above, with a significant gap between the skills level of Hillingdon residents and job opportunities, prevents local people accessing knowledge sector jobs in locations such as Uxbridge and Stockley Park. Unless there are complementary initiatives across the economic development and transport strategies, there is likely to be continued high inward commuting to the detriment of the local labour force.
- e) The draft Transport Strategy, referred to in para. 16 c) above does not address the concept of area-wide travel plan partnerships for holistic area-wide land use and transport planning, scheme preparation and the preparation of bids for funding. This could prejudice the council's regeneration initiatives in Hayes and West Drayton.
- f) The issue of funding Crossrail fails to be addressed comprehensively in the Mayor's planning and transport strategies. The Revised Plan and draft Supplementary Planning Guidance require the council to negotiate Section 106 contributions for Crossrail. This could have a negative impact on the regeneration of Hayes and West Drayton, as pointed out in para 17 above, particularly as the council's priority is for local transport improvements. However the Transport Strategy fails to address the local needs of the Hayes – West Drayton economic development area, where the lack of orbital public transport access, especially in the area north of the A40 could act as a serious constraint to growth.

### **Financial Implications**

There are no specific financial implications arising from commenting on the Mayor's strategies.

### **EFFECT ON RESIDENTS, SERVICE USERS & COMMUNITIES**

It is considered that the Mayor's three of interlinked strategies, namely the draft Revised London Plan, Transport Strategy, Public Draft and the Mayor's Economic Development Strategy will, as they become finalised, influence the pattern of development in the borough, the transport choices available, local employment opportunities and the quality of life for local residents. The new London plan will have significant implications on the land use planning system and the influence that local councils and communities will have on future developments within their areas. The new Transport Strategy will determine the extent and type of funding available from Transport for London, which will shape the future pattern of transport in the borough. The new Economic Development Strategy will influence the Mayor's priorities, including investment decisions, for economic development which will impact on regeneration, businesses and employment prospects for local residents. Until the finalised documents are available it is hard to determine the precise implications.

### **Consultation Carried Out or Required**

### **CORPORATE IMPLICATIONS**

#### **Corporate Finance**

There are no direct financial implications arising from the recommendations in this report on commenting on the Mayor's strategies. However, there may be a need for officers to

participate in the next formal stage of the plan, which is an examination in public, likely to be held in the autumn of 2010, and on-going involvement through the process as the Plan moves towards being adopted in 2011-12. These costs would be met within existing budgets and are not considered to be outside the scope of normal planning functions.

In terms of wider impacts on the Council's resources, the key provisions of the Mayor's Draft Replacement London Plan, Transport Strategy Public draft and draft Economic Development Strategy, which if taken forward into implementation as expected, may have a range of financial implications for Hillingdon both as a planning authority and as a major landowner, developer and stakeholder in the future development of the borough.

### **Corporate Procurement**

Corporate Procurement have noted the content and recommendations of this report. Individual projects that are subsequently commissioned to support and deliver the agreed outcomes as outlined in this report, particularly where there is a need to award contracts or commit external expenditure, shall be subject to the Council Standing Orders and Public Contracts Regulations as in force at that time.

### **Legal**

There are no special legal implications for this consultation by the Mayor of London. In considering the consultation responses, the Mayor must ensure there is a full consideration of the representations from this Council, including those which do not accord with the proposals.

### **Corporate Property**

The Head of Corporate Property Services supports the recommendations contained within this report.

### **Relevant Service Groups**

This report has been prepared in conjunction with corporate policy and housing.

### **BACKGROUND PAPERS**

'The London Plan, Consultation Draft Replacement Plan' (Oct 2009)

Mayor's Transport Strategy Public Draft' (Oct 2009)

Rising to the Challenge – the Mayor's Economic Development Strategy for Greater London, Public Consultation Draft (Oct 2009)

A new Plan for London – Proposals for the Mayor's London Plan April 2009

Mayor's Transport Strategy Statement of Intent (May 2009)

Rising to the Challenge – proposals for the Mayor's Economic Development Strategy (May 2009)

The London Plan (Consolidated with alterations since 2004) Feb 2008

Council Motion – 5 November 2009

## **APPENDIX 1**

### **The Revised London Plan (The London Plan – Spatial Development Strategy for London Consultation Draft Replacement Plan, Oct 2009)**

#### **Key Provisions and Issues for Hillingdon**

##### **Chapter 1: Context and Strategy**

1. The revisions to the strategic vision and objectives for London set out in the revised Plan, whilst not significantly different from those in the existing London Plan, include reference to promoting heritage, neighbourhoods and identity. This new emphasis is welcomed and supported. In general this new strategic direction will enable the council to promote local design and conservation policies that have more regard to the unique character of the borough, contribute to its place shaping neighbourhood agenda, and resist development that fails to respect local character. Policies in the revised Plan that give effect to this approach are included in Chapter 7 of the revised Plan, (Living Places and Spaces).
2. The main principles within the key diagram appear to remain unchanged, and therefore does not reflect any changes to the strategy.

##### **Chapter 2: London's Places**

3. The key provisions relating to London's Places include a new approach to planning for the sub-regions of London with new policies on the functions of sub-regions; new policies for Outer London sub-regions and a new Policy on Strategic Outer London. Policies for outer London have been informed by the work of the Outer London Commission (OLC) on the economic potential of outer London. These policies are welcomed.
4. The removal of specific policies for the sub-regions in the Plan and the inclusion of new functions relating to monitoring areas is generally supported. For West London boroughs this should allow a stronger strategic focus in emerging Core Strategies unconstrained by prescriptive sub-regional policy.
5. As Hillingdon lies on the western edge of London, the Mayor's proposals to work closely with neighbouring regions, local authorities and other organisations is welcomed. The proposals to support (and where appropriate lead) work with authorities and agencies covering areas adjoining London on particular issues of concern should be expanded. Further clarity on implementation, particularly for cross-boundary working, growth sectors and Strategic Outer London Development Centres would also be welcomed.
6. In dealing with London and the wider metropolitan area (Policy 2.2 of the revised Plan) the Plan, whilst advocating that outer boroughs work with authorities and agencies in neighbouring regions outside Greater London, to develop common approaches to issues of cross-border significance, fails to provide any mechanisms to assist joint working. The council contributes to initiatives for developing the Western Wedge economic regeneration corridor (extending from West London to the Thames Valley) with its West London borough partners but mechanisms need to be developed with

authorities outside London. The absence of meaningful arrangements for joint working is a particular concern for Hillingdon because policies in adjoining shire counties and districts put the borough at a disadvantage when competing for inward investment, including retail development.

7. The new Policies for outer London informed by the work of the Outer London Commission (OLC) on the economic potential of outer London are welcomed. It is encouraging that the suggestions for growth hubs, rejected in the OLC's Interim Report, do not feature in the Revised Plan. Instead new policies are included to address the Outer London economy (constraints on economic growth) and transport issues (orbital, radial and qualitative needs). The approach in the Revised Plan can be summarised as a more organic pattern of economic growth, (characterised by a "star and cluster" model). This approach makes use of the existing town centre network. This is supported as it provides opportunities for the growth of Uxbridge town centre and the Hayes/West Drayton regeneration corridor, which are strategic policies being developed in the council's emerging Core Strategy of the LDF.

8. In making comments to the Mayor's Proposals for the London Plan in June 2009, the council strongly supported the role of the Commission, and welcomed the opportunity to play a greater role in its work. However, despite commenting that the emerging vision for outer London needs to be reflected in key policy documents, backed-up by robust evidence, there does not appear to be specific guidance in the revised London Plan that would assist this process. This is particularly relevant for Hillingdon's town centres that need support to adapt to changing demands.

9. Policy 2.6 develops an Outer London vision and strategy, by 'building upon its great diversity and varied strengths'. Unfortunately it is unclear what is meant in practice by great diversity and varied strengths, and whether policy prescription for outer London is any different than that for the rest of London.

10. New policy 2.7 on the Outer London Economy contain proposals for development centres, based on work undertaken by the OLC. Hillingdon is identified for the following strategic functions: leisure/tourism, logistics, other transport related functions and higher education as sources of economic growth. These functions have been informed by the council's contribution to the OLC and are supported.

11. With regard to Policy 2.4 - the 2012 Games and their legacy, there is no reference to Heathrow Airport's contribution to the 2012 Games as an international gateway to London, and it is considered appropriate to make such a reference.

12. The Heathrow Opportunity Area (HOA) has been split, with Southall forming a new separate Opportunity Area. Changes to the Opportunity Area that relate to Hillingdon are summarised on the following table:

<b>Opportunity Area</b>	<b>London Plan</b>	<b>Area (ha)</b>	<b>New Homes (Minimum)</b>	<b>New Jobs</b>
	2008 Plan	821	10,750	11,000
<b>Heathrow</b>	Consultation Draft	700	9,000	12,000

13. The rationale of a smaller HOA Area with fewer homes and more jobs needs to be considered further by the council in conjunction with the GLA when more detailed policies and proposals for the Area are prepared in a 'Planning Framework'. It is noticeable however that the Revised Plan includes Uxbridge in Strategic Policy Directions for the HOA, recognising that it is set to grow significantly with redevelopment of RAF Uxbridge. Officers welcome the Mayor's support for an integrated approach to the distinct environmental and growth issues facing the area around Heathrow.

14. The Mayor's proposal to provide pro-active encouragement, support and leadership for partnerships preparing and implementing Opportunity Area Frameworks (OAPF) is welcomed. However clarification on the remit of Opportunity Area Planning Frameworks is considered important. Some additional information on the Heathrow OA is set out in the draft London Plan, referred to above. However it remains unclear what additional capacity and other testing will take place, who will be responsible for further studies and strategies, what form further work will take, when it will take place, and what input from Hillingdon is expected.

15. It appears that the areas for regeneration are based on the 20% most deprived 'Super Output Areas'. Although the map shows a small area within Hillingdon, no further information is provided and the map is not detailed enough for definition. Policy 2.14 requires boroughs to identify Regeneration Areas and prepare policies for these areas. If boroughs are responsible for identifying their own areas for regeneration, it is not clear what the purpose of map 2.5 is and how far it should be taken into account.

16. Strategic Industrial Locations (SIL's) identified in the revised Plan remain unchanged in Hillingdon, with Hayes Industrial Area, Stonefield Way/Victoria Road and Uxbridge Industrial Estate still identified as Preferred Industrial Locations (PILS); and the North Uxbridge Industrial Estate identified as an Industrial Business Park (IBP). The town centre hierarchy is also unchanged (with Uxbridge retained as a Metropolitan Centre and Eastcote, Hayes, Northwood, Ruislip and Yiewsley/West Drayton being listed as District Centres). These designations are supported.

### **Chapter 3: London's People**

17. Chapter 3 of the Plan deals with housing provision. In respect of Hillingdon's housing targets 4 main changes are made:

- An overall target of 6200 new homes between 2011-2021, which is an increase in the annual housing target from 365 units to 620 units
- The split of 620 units into "conventional supply" of 415 units and non self-contained 207 units
- The deletion of the 50% affordable housing target and replacement by borough determined targets
- A change in split of tenure from 70%/30% social rented/intermediate to 60%/40%.

18. The Revised Plan, acknowledging the differences in type, quality and cost of housing, states that London should be treated as a single housing market. Whilst the

regional housing market is acknowledged, the differences that exist in individual boroughs are often stark and result in wide variation in the viability of housing sites.

19. Officers will be required to take account of three levels of Housing Market Assessment in the formulation of housing policy (regional, sub-regional and local). The weight attached to each level is unclear, however given the Mayor's emphasis on addressing local need, it is considered that the borough level HMA will be most relevant in determining future policy. It is considered that the future drafts of the Plan could usefully clarify this issue.

20. With regard to increasing housing supply, officers consider that the proposed monitoring target of 207 non self-contained (NSC) units is disproportionate to the conventional total and is not acceptable or deliverable. There is a strong objection to this figure. In comparison with other boroughs, Hillingdon has the highest percentage increase of non self-contained units to conventional supply. The borough has seen a 70% increase in its overall monitoring target. This is the highest percentage increase of any borough and is as a direct result of the proposed monitoring target for non self contained units.

21. It is understood that the NSC figure has been based on the delivery of student halls and hostels in each borough in the last four years. In Hillingdon's case the last four years have seen a significant and unusually large number of new units constructed at Brunel University. Further capacity has also come forward from residential and young offenders institutions in the borough. The very fact that these building programmes have taken place means that no further significant increases in non self contained units will be required by these institutions in the short to medium term.

22. Officers are concerned that if these figures are included in the emerging Core Strategy it will be found unsound on the basis that it does not meet the tests of deliverability contained in PPS12. The target for non self-contained dwellings should be reduced to 48 units per annum for Hillingdon. Overall, this reduced figure is considered to be deliverable and would be acceptable.

23. In addition, Hillingdon performs well in bringing back into use empty residential properties and it is considered that an allowance should also be made for this supply in formulating housing targets.

24. Policies 3.1 and 3.2 deal with the provision of social infrastructure (schools, hospitals etc.) and addressing health inequalities. Officers support the principle that meeting need is a matter for local determination and welcome the inclusion of a policy on health inequalities. Improved access to open space is a key factor that can help to address this issue. The recognition that high quality homes and good design can be important to health and well-being is also welcomed and will be reflected in Hillingdon's emerging Local Development Framework.(LDF).

25. Policies 3.3 and 3.4 deal with optimising housing potential. In response to the London Plan Initial Proposals document issued in April 2009, officers noted that the housing density matrix contained in the previous plan placed too much emphasis on numerical requirement to maximise yields from housing sites. The housing density matrix has been retained in the Revised Plan and the need for this matrix at Table

3.2 continues to raise concerns. Its content is overly complicated and difficult to apply. The supporting text to the policy notes that the matrix should not be applied mechanistically and the density ranges are only the starting point for the planning process. Notwithstanding this, given the significant and welcome emphasis now placed on local determination, it is considered that the density matrix adds little value of the plan and should be removed.

26. Policy 3.5 covers quality and design of housing developments. Officers support the policy that allows boroughs to introduce a presumption against development in back gardens, where this can be locally justified. Likewise, there should be strategic direction on the importance of front gardens, which have a significant impact on the streetscape within London, particularly in well established areas. Front gardens, including hedges are very important features of suburban streets, and given that they are being lost wholesale, they do require protection from development by means of a policy within the Revised Plan. Furthermore there should be support for a 10% rule to restrict the proportion of flatted developments in residential areas, in order to protect the character of those areas, both in terms of appearance and other adverse impacts, such as loss of families within the area, traffic congestion and parking stress.

27. The emphasis on the quality of new homes is supported, including the minimum internal space standards for development contained in Table 3.3. These proposed minimum internal space standards are consistent with, and in some cases exceed, the council's standards as set out in its Hillingdon Design and Accessibility Statement: New Residential Layouts.

28. Policy 3.7 covers large residential developments. The principle that large residential developments should be in areas of high public transport accessibility is supported. The need to co-ordinate infrastructure provision for large developments is also supported. It is considered that further justification is required for the 500 unit threshold to provide infrastructure co-ordination statements.

29. With regard to Policy 3.8 on housing choice, there is support for the principle that residents should have a genuine choice of homes and that boroughs work with the Mayor to identify local needs. Key issues raised in the policy are as follows:

- The provision of affordable housing is a strategic priority. This is also a key priority for the council.
- The provision of 10% of homes to be accessible by wheelchair is consistent with the council's Housing Design Statement
- The need to provide for older Londoners is recognised and supported.
- The final aspect of this policy relates to meeting a demonstrable need for student accommodation. In the Strategic Housing Land Availability Assessment, future annual monitoring targets for non-self contained accommodation have been based on the past delivery of student accommodation. Paragraph 3.44 notes that the SHLAA has identified a London-wide capacity for over 17,000 student places. This figure has been based on a four year trend, rather than a demonstrable future need and appears to be at odds with the principles of policy 3.8.



30. Policy 3.9 deals with gypsies and travellers and raises concern for the council. The London Plan notes that 72% of the need for gypsy and traveller accommodation comes from those who already live in bricks and mortar accommodation. Whilst the term is not specifically mentioned, the basis for this figure comes from those who have a psychological aversion to such accommodation. The West London Housing Partnership is undertaking further work on gypsy and traveller requirements and it is understood that this will provide further guidance on the issue of psychological aversion. Officers consider that this evidence should be taken into account when setting borough wide targets. Until this is completed, officers do not support the proposed target of 22 additional pitches between 2007 and 2017, which is considered to be excessive.

31. Policies 3.11 to 3.14 deal with affordable housing. The definition of affordable housing is considered to be too prescriptive. It should be defined more flexibly to enable boroughs to take account of local initiatives to address local housing needs, such as the first time buyer initiatives.

32. With regard to affordable housing targets, officers support the principle that boroughs should set targets for the amount of housing required over the plan period and the flexibility to express targets in absolute or percentage terms. The increased emphasis on the provision of intermediate housing is supported, although it is noted that the 60%/40% split does not reflect the conclusions of the London wide Strategic Housing Market Assessment. Boroughs will take a lead from the emphasis that has been placed on the evidence base and further information should therefore be provided to justify this deviation in the Revised Plan.

33. With regard to negotiating affordable housing on individual private residential mixed use schemes, the provision of affordable housing is a key priority in Hillingdon and the policy to maximise reasonable provision from mixed use schemes is supported. Again, the emphasis on local circumstances is supported as is the message that developers should make the most effective use of subsidies to ensure that affordable housing is delivered.

34. The affordable housing threshold of 10 or more residential units remains unchanged and is supported. The policies on ensuring high quality housing and design are also supported.

35. The Revised Plan includes a new policy to encourage balanced communities and diversify mono-tenure areas. Infill schemes in predominately social housing estates should be targeted for intermediate and market housing and vice-versa. This approach is supported in principle.

#### **Chapter 4: London's Economy**

36. Chapter 4 deals with employment provision and changes from the current 2008 Plan are minimal. The key provisions relevant to that Hillingdon include:

- To encourage the renewal and modernisation of office stock in viable locations. The most viable locations include Stockley Park, which should assist towards greater sustainability.
- Tourism Action Zones have been dropped.

- A hotel target of 40,000 net hotel rooms in London by 2031 (10% wheelchair assessable rooms).
- A specific requirement is included to assess the impact of new or extensions to existing edge or out of centre development.
- The revised London Plan retains policies regarding the designation of cultural quarters to accommodate new arts/cultural/leisure facilities and the promotion and development of cultural and visitor attractions where they can contribute to regeneration and town centre renewal.
- Support for growth in additional comparison goods retailing in metropolitan and major centres.
- Support for growth in additional convenience goods retailing particularly in district, neighbourhood and local centres.
- Contributions are to be sought from large retail developments through planning obligations for provision of affordable shop units suitable for small or independent retailers.

37. The Outer London Commission has informed the preparation of the Revised Plan (see observations in main report) and the Outer London Commission's Interim report (May 2009) appears to have been largely reflected in the Revised Plan, which is welcomed.

38. The employment figures are indicated as provisional. There are a number of outstanding issues such as, how will employment figures be divided between the boroughs? There is also a need to clarify the approach to be taken to office markets in different parts of London. This needs to be supported by detailed studies and robust evidence.

39. The Mayor's intention to take a more co-ordinated approach to tourism is welcomed.

40. The Mayor's support for cultural facilities in outer London is welcomed, as it supports the council's efforts to improve cultural/entertainment opportunities within the borough, particularly in the metropolitan town centre of Uxbridge, and proposals for the RAF Uxbridge site. There is support for the sustainable management of the night-time economy and the identified role of Uxbridge as a night time economy cluster of strategic importance.

41. The policy to secure affordable small shop units in major retail developments is supported, as it will assist the retention and growth of small businesses. However, a realistic assessment of the need for small shops (and indeed larger retail outlets) will need to inform their provision.

42. Despite the significant 'Heathrow effect' on west London, London and the UK economy, the Revised Plan makes no reference to Heathrow in this chapter. The revised London Plan should refer to the on-going role of Heathrow airport on the economy of London.

## **Chapter 5: Climate Change**

43. With regard to Policy 5.2, Minimising carbon dioxide emissions, the previous 20% on-site renewable energy target has been dropped in favour of a greater focus on energy efficiency, which is broadly supported.

44. The initial emphasis on energy efficiency prior to renewable technology is particularly welcome. The Revised Plan includes specified minimum targets for installed renewable energy capacity to be met in London (such as 317 MWe electricity from photovoltaics), which may however be difficult to achieve and monitor.

45. Officers also welcome the continued requirement for boroughs to achieve efficiency standard improvements ahead of building regulations changes i.e. above existing minimum standards: (2010 – 2013: 44% reduction in CO2 emissions, 2013 – 2016: 55% improvement, 2016 – 2031: zero carbon). However it is recommended that the policy should be reworded to reflect the 2010 Building Regulation changes. The policy as worded is considered to be overly complicated and it is unclear whether the 20% renewable requirement fits in with the 44% CO2 reduction target. It is also unclear where the new policy fits in with the Code for Sustainable Homes, social housing, and the draft London Design Guide. A clearer policy could minimise the likelihood of conflict.

46. The Revised Plan introduces a target of 25% of heat and power used in London to be generated through the use of localised decentralised energy systems by 2025. The policy on the concept of Combined Heat and Power (CHP) as part of a CO2 reduction strategy is supported. However if the GLA are to continue to promote CHP, the Plan needs to acknowledge that this will lead to a short term reliance on gas. The Plan also needs to be clearer on how to future-proof CHP networks so they do not rely on gas. Future development linked to a gas fired CHP could result in a reliance on scarce resource (gas) with no viable alternative.

47. The policy requiring air quality assessments where biomass boilers are proposed is welcomed, and the same requirement should be included for decentralised gas, biomass, or biofuel fired CHP plants in air quality management areas.

48. Policy 7.26 deals with increasing the use of the Blue Ribbon Network for freight transport. This is welcomed. However, it is considered that the Plan should set out the current strategic network that needs protecting. There are many miles of canal and waterways in the borough some of which may be appropriate for further waterborne transportation. The waterways are a regional opportunity to enhance a sustainable transport option as outlined in Policy 7.26. This requires the involvement of a number of boroughs. The Plan should help to identify the possibility for waterways on a regional level to assist boroughs to identify areas within the LDF.

49. With regard to the polices regarding waste, there is considerable concern about the waste targets remaining unchanged and being subject to review at a later date. The West London boroughs are in the process of preparing a draft West London Waste Plan and its timetable has been significantly adversely affected by the delays caused by the GLA's inability to prepare new waste arisings and apportionment figures.

## Chapter 6: Connecting London

50. Chapter 6 includes policies relating to the integration of transport and development, public transport, capacity of the transport network, sustainable transport, parking and aviation.

51. The Revised Plan encourages the improvement of interchanges between different forms of transport, particularly around major rail and underground stations, especially where this will enhance connectivity in outer London. This is welcomed.

52. There is a clear opposition expressed to a third runway at Heathrow, which is welcomed. The Mayor seeks to ensure that existing aviation infrastructure is used to its fullest extent before other courses are pursued, which is also welcomed. However the Plan does not refer to any other airports, nor does it include any future aviation strategy for London's airports. This is regarded as a significant omission.

53. The Mayor strongly supports efforts to ensure public transport alternatives for travellers, including the proposed High Speed 2 link, Crossrail, Airtrack, cycle super highways to central London, cycling initiatives in outer London town centres, and improving the underground network. With regard to High Speed 2, any proposals should be assessed against the likely reduction in short haul flights to and from Heathrow and the impact of the rail link on the road infrastructure in the Heathrow area. The support for Crossrail is welcomed, and whilst Airtrack is supported in principle, there are concerns about the current proposals in terms of its local impacts. Whilst improved cycle routes are also supported, there are concerns about the idea of 'cycle super highways' because these often take up much needed road space for buses and other vehicles, which can cause traffic congestion. Cycle super highways can also impact on on-street parking, loading and unloading, the loss of which may adversely impact on local businesses.

54. The Revised Plan states that up to £600 million is to be contributed through planning obligations for Crossrail from developments that contribute to transport needs. There is concern about the impact that any significant requirement for Crossrail contributions may have on the regeneration of Hayes and West Drayton, due to the likely adverse affect on the viability of development proposals. There is also concern that such contributions will reduce the level of contributions that can be sought for local infrastructure and community facilities, which are needed in these areas.

55. The Revised Plan retains a policy supporting improvements to the quality of bus services and requires development plans to secure standing, garaging and drivers facilities where needed. This is welcomed.

56. The Revised Plan supports an increase in walking with specific mention of the London Outer Orbital Path (LOOP), borough routes and accessible, safe and convenient routes to town centres, transport nodes and key uses. These policies are welcomed.

57. The Revised Plan supports a co-ordinated approach to smoothing traffic flow and tackling congestion (i.e. to promote sustainable modes of travel and to reduce the need to travel). However the policies should reflect the need for many people to continue to be use the car in outer boroughs such as Hillingdon.

58. The Revised Plan considers that there is only limited capacity for tackling congestion by increased road building, and this is accepted.

59. The text in the Revised Plan acknowledges that, with regard to retail development, boroughs should take a co-ordinated approach on car parking standards with neighbouring authorities, including those outside London to prevent competition between centres based on parking availability and charges. However the Car Parking Standards in the Revised Plan remain unchanged, and there is concern about the prescriptive and blanket nature of these standards, which are not appropriate for some outer London boroughs, including Hillingdon.

60. New Cycle Parking Standards have been introduced in the Revised Plan, where there were none previously. The standards are generally less onerous than in Hillingdon's UDP and are welcomed.

## **Chapter 7: London's Living Places and Spaces**

61. This chapter covers a wide range of issues, including place shaping, the built and natural environment, including heritage, safety and security, air pollution and the Blue Ribbon network. Most of this chapter is non-controversial and is generally supported. The key provisions include:

- No change proposed to open space standards for residential development.
- Introduction of inclusive access at the neighbourhood level by extending the inclusive design principles embedded in Lifetime Homes standards.
- Secured by Design policies strengthened to reduce criminal behaviour.
- Developments should have regard to the local character of the area, be human in scale and be informed by the surrounding environment.
- The draft plan includes detailed guidance about where tall buildings can and cannot be located.
- Boroughs are required to include policies that identify and protect memorials and natural landscape character areas.

62. The Revised Plan's emphasis (Policy 7.1) on building London's neighbourhoods and communities, focusing on improving access to community infrastructure (including green spaces), commercial services and public transport is welcomed. However, it is considered that the GLA should play a more strategic role in co-ordinating future investment decisions of utilities and major infrastructure providers, rather than depending on the boroughs to prepare plans to meet the needs of new development and regeneration.

63. With regard to Policy 7.7, Location and design of tall buildings, concern is raised that the Policy omits reference to 'privacy and amenity' in assessing the impact of tall buildings in residential environments. It is considered that protection of privacy and amenity should be an important consideration in assessing the impact of tall buildings and this should be consistent with the Policy 7.6, Architecture, where this consideration is included.

64. Policies 7.24 to 7.28 for London's Blue Ribbon Network, including increasing the use of the network for additional waterborne freight, infrastructure and recreational use, tourism and biodiversity are supported. However, it is considered

---

that the policy should also address the regenerative opportunities that waterside environments can provide. This is particularly relevant to Hillingdon where development opportunities adjoining stretches of the Grand Union Canal in Hayes and West Drayton will be identified in the Local Development Framework for high quality mixed use development, realising the potential of the canal-side character and environment.

## **Chapter 8: Implementation, Monitoring and Review**

65. There is concern about the absence of any delivery plan and the fact that there is no consideration of the strategic infrastructure required to support the identified growth in the Revised Plan. It is considered that the Plan should co-ordinate London-wide strategies of major infrastructure providers.

## **APPENDIX 2**

### **The Mayor's Transport Strategy Public Draft, Oct 2009 Key Provisions and Issues for Hillingdon**

#### **The Mayor's Transport vision and priorities**

1. The Mayor wants 'London to be London best big city on earth' by providing opportunities for talent, economic activity and growing up happily. He has set the following six goals:

1. Support economic development and population growth
2. Enhance quality of life
3. Improve safety and security
4. Improve transport opportunities
5. Reduce transport's contribution to climate change and improve its resilience
6. Support 2012 Olympics, Paralympics Games and its legacy

2. In order to develop the plan, the Mayor will seek to improve the existing transport system before introducing new schemes and new ideas. The strategy contains 129 unspecified qualitative proposals tailored to 35 policies setting the scene for five sub-regional strategies to be developed in partnership with the boroughs during mid 2010.

3. In order to achieve these goals, the Mayor has a number of proposals which can be summarised as follows:

- Bringing about a revolution in cycling
- Providing better, more attractive streets to encourage people to walk and lead active, healthy lifestyles
- Delivering Crossrail, which will link east and west London and relieve crowding on the Tube
- Upgrading the Tube and suburban and national rail links
- Improving interchange between different forms of transport to make journeys smoother and less stressful
- Providing better journey planning information
- Improving road journeys and smoothing the flow of traffic through new traffic control systems and better coordinated road works
- Taking account of the needs of business in transport planning
- Using the river more for people and goods
- Promoting new cleaner technologies such as electric vehicles

4. In addition, if the above and other improvements in the strategy are not sufficient to meet the Mayor's objectives, the Mayor will consider managing demand for travel through fares, information and a fair system of road user charging.

#### **The Mayor's Challenges and Strategic Policies**

5. The Mayor's challenges and strategic policies, in terms of addressing his six goals, are summarised below:

a) Support economic development and population growth:

6. The Mayor's draft Transport Strategy seeks to address the growth in London from 7.6 to 8.9 million population and 4.7 to 5.5 million jobs from 2007 to 2031. Freight transport and passenger rail demand are set to raise by 30% increasing the need to manage road space and invest in rail, Underground and bus transport.
7. The draft Transport Strategy projects that Tube crowding within the London Borough of Hillingdon will roughly remain similar to current levels (Figures 19-20) whilst rail crowding in the South Ruislip area will improve slightly.
8. The Mayor identifies the need for access improvements to and between Outer London Town Centres but orbital measures and improvements in the Uxbridge area are not mentioned. Policy 7 refers to increasing awareness of orbital transport and increasing orbital connectivity.
9. Highway congestion in the Uxbridge area is set to increase average vehicle delay by 25% from 1-1.5 to 1.5-2 minutes per vehicle kilometre.
10. The Mayor is seeking to improve freight distribution through Delivery and Service Plans along with efficiency measures.

b) Enhance quality of life

11. The draft Strategy will enhance the quality of life through reduction of emissions, improving noise impact from transport, and promotion of healthy travel options. It will promote a better travel experience through expanding public transport capacity and quality.

c) Improve safety and security

12. Policies 18-20 seek to reduce the crime rate, fear and anti social behaviour, improve road safety and operational safety.

d) Improve transport opportunities

13. Figure 27 shows the average public transport journey times to/from Bank throughout London. It shows that journey times are generally in excess of 45 minutes for most of the London Borough of Hillingdon with the exception of the Heathrow, Hayes and West Drayton areas.

14. Policy 22 seeks to enhance connectivity, reduce community severance, promote community safety, enhance the public realm and improve access to jobs. Policy 23 supports regeneration of Opportunity Areas and Areas of Intensification as described in the London Plan without explicit and consistent cross references.

- e) Reduce transport contribution to climate change and Improve resilience



15. Policy 24 contains the only explicit monitoring criterion to measure the success of the draft Strategy. It seeks to achieve 60% CO<sub>2</sub> reduction from ground-based transport.

16. Policy 25 seeks to improve public safety and resilience to anticipated climate change impact without further development in the draft Strategy.

f) Support 2012 Olympics, Paralympics Games and its legacy

17. Policy 26 seeks successful transport infrastructure and operation during the Games, and to maximize the benefits of its physical and behavioural legacy.

### **The Mayor's Transport Proposals**

18. The Mayor's proposals, which aim to achieve a balanced and integrated approach, are set out under the following headings, with proposals to:

7. manage and enhance the transport system
  1. encourage more cycling and walking
  2. improve safety and security
  3. improve London's environment
  4. reduce transport's contribution to climate change and improve its resilience
  5. manage the demand for travel

19. The strongest focus is on air quality / climate change (23 proposals numbered 90-113), rail (proposal 1-22) and safety & security (proposals 62-81). Proposals vary in the level of depth, some being very general and described loosely with descriptions like "will seek to reduce accident fatality and injury rates..." (no. 62) and "will prepare adaptation strategies to improve safety and network resilience to threats posed by climate change" (no. 110) and others being very specific (no. 112 announcing plans to plant 10,000 trees in 2012 and 2,000,000 by 2025).

20. Smoothing traffic has top-priority in the Mayor's "holy war on holy roads" removing blockages from main arteries to avoid "heart attacks" in London. The Mayor wants to make travel an enjoyable experience by creating an attractive public realm "de-stressing" the environment as at Oxford Circus and smoothing the traffic. He wants to implement self-enforcing measures that people will respect, which will imply a reduction in the number of bus lanes, cycle lanes and guardrails. He is keen on cleanliness, sufficient and friendly staff on public transport, cooling the tube, common sense enforcement, travel planning, training and infrastructure provision. Information provision features prominently and repetitively throughout the document enabling people to know, for example, when it is quicker or easier to walk or cycle rather than use a car or bus/tube.

21. The measures are described under headings such as transforming the tube, enhancing rail, revolutionising cycling, making walking count, improving bus services, and making interchanges easier.

22. Figure 31 shows the committed rail network enhancements including Chiltern Railways frequency improvements; West Coast Main Line Train lengthening and frequency increases; and Great Western Main Line train lengthening. Commitment to Crossrail is very strong with ensuring that it is delivered by 2017, and fully

integrated with the rest of London's public transport (proposal 5). The Mayor is also committed to future extensions to Crossrail beyond the GLA area (proposal 6).

23. Rail enhancement includes commitment to introduction of Crossrail and support for Airtrack, High Speed Rail and Overground integration with full Oyster card cover. The Mayor supports the expansion of international rail services that improve London's connectivity with Europe, and provide a viable alternative to air travel. There is a specific proposal (no. 4) that refers to the Mayor's support for High Speed Two, with a preference stated for Euston as being the best London terminal.

24. The Tube transformation is to achieve 30% more capacity, more step-free stations, new air-conditioned trains and modern signalling systems. The Metropolitan Line will be the subject of new air-conditioned trains and signalling with effect from 2010 (Proposal 20). The Central Line will follow from 2020. The Mayor will continue delivering Tube station refurbishments, although there is no reference to Uxbridge.

25. Economic development and population growth will be enabled through upgrading the Metropolitan, Piccadilly and Central Lines in the medium term and improving access to Outer London town centres whilst resisting further expansion at Heathrow, without offering alternatives to address the demand for runway capacity in the South East.

26. The Mayor wants to improve London's buses through providing more efficient services on a reduced budget with better information and environmentally friendly engines. Figure 39 shows the Orbital bus services in Outer London with a glaring gap between Heathrow and Northwood Hills in Hillingdon. Proposal 24 seeks to improve bus passengers' journeys through incentivised operating contracts, bus priority measures, enforcement and real time information.

27. 'Transport opportunities for all' is to adopt the whole journey approach ensuring that 95% of people live within 400m of a bus stop with easier interchange proposals to improve travel between places in Inner and Outer London.

28. Proposal 28 seeks to use existing facilities to maximise capacity for coaches.

29. Proposal 29 encourages the community sector to develop transport services.

30. Paragraph 342 states that the London taxi service is widely recognised as the best in the world. Proposal 26 wants to improve taxi facilities, reduce taxi emissions and improve driver behaviour.

31. The cycling revolution covers provision of secure cycle parking, special cycle routes, 24 hour cycle stations and an invitation to become a Biking Borough. Better streets and improved environment initiatives include low emission vehicle projects, encouragement of physical activity and recreation, restoring sense of pride and attracting businesses and jobs with better street schemes

32. The Mayor leaves the door open to managing transport demand through fares, information and fair road user charging system.

33. The draft Strategy opposes any further increases in capacity at Heathrow. It supports the government's position that airport operators should pay for the cost of transport upgrades to roads, rail or other services where these are needed to serve the airport.

34. The draft Strategy aims to maximise passenger and freight services on London's waterways, (The Blue Ribbon network), which includes the Grand Union Canal and River Colne. The proposals seek to better integrate river services into the overall transport network, and look to increase the use of the Thames and the canal network for waterborne freight.

### **Key Issues for Hillingdon**

35. The Mayor recognises that different areas of London require different policy interventions. His proposals for central London will focus on tackling congestion, increasing the capacity of the rail network, encouraging walking and cycling, and managing demand. In Outer London, due to the dispersed nature of trips, the Mayor accepts that proposals need to acknowledge the role of the car, particularly for medium to longer distance trips, and the use of cleaner, low emission cars will be encouraged over others. For Outer London town centres, measures to improve bus accessibility, public realm, walking and cycling will generally be prioritised. This approach which reflects the issues affecting outer boroughs like Hillingdon is welcomed.

36. Notwithstanding the above, the Mayor's draft Transport Strategy policies and proposals lack clarity in terms of funding potential for schemes for West London in general and Hillingdon in particular. There are real issues about how well the London Plan and the Mayor's Strategies for Transport and Economy will deal with the opportunity areas which are being considered by the West London Alliance.

37. Whilst there is commitment to a range of improvements to the rail network, the majority of specific improvements referred to will not however improve services in Hillingdon. With respect to station capacity enhancements, a number of specific stations are mentioned but none in Hillingdon, which is a concern (proposal 11).

38. With regard to the tube network, there is a commitment to upgrade all tube lines, to increase the network capacity, with new rolling stock and/or replacement of signalling systems (proposal 11). There is also a commitment to continue the programme of tube station refurbishments. There is also recognition of the need to relieve tube station congestion, but the list of stations referred to for enhancements does not include any in Hillingdon, which is a concern.

39. The draft Transport Strategy does not clearly define transport need, nor clarify the relationship between needs analysis and proposals, masking the transport issues of real concern within the London Borough of Hillingdon. The Strategy lacks a clear 'skeleton' proposal within which Hillingdon can develop its own proposals. There is concern that the final proposals will not properly consider Hillingdon's transport needs and that suitable schemes may not be eligible for funding within the emerging West London sub-regional transport plan.

40. The draft Transport Strategy lacks tools to monitor its success and needs to address how congestion will be monitored and managed, especially on key routes and interchanges. Hillingdon Council officers have been supporting the West London Alliance in seeking to monitor key access routes to town centres and other key attractors (hubs) rather than “a selection of routes” proposed in the draft Strategy.

41. The draft Transport Strategy needs to explicitly refer to demographic details and transport need. Bus route planning criteria and modal change management tools are lacking or insufficient. It is a concern that carbon intensive (long-distance) commuter, travel and visitor travel, and fleet and goods movements are not addressed.

42. The draft Strategy needs to provide guidance on preparing and funding access proposals for town centres, opportunity areas and major developments. It could include guidelines on developing a clear and a comprehensible public transport network, 20 mile/hr zones, shared-surface schemes and the role of parking standards / provision in achieving proposed outcomes.

43. Proposal 127 is to remove the Western extension of the central London Congestion Charging Zone. The Mayor is, however, still considering how to manage congestion potentially using road user charging (Para 36/41) to meet the CO2 emission reduction target and encourage low carbon vehicle use to meet the policy gap on reductions in CO2 emissions (Figure 58). This may have implications for the Heathrow area. Para 727 refer to the possible charging in metropolitan town centres, which could be relevant for Uxbridge. Para 666 refers to bottlenecks proposing that local smarter travel interventions be targeted to reduce or manage traffic flows in particularly sensitive locations.

44. With regard to parking, the draft Strategy supports the concept that parking charges should vary not only by location and duration of stay, but also by the environmental impact of the vehicle (e.g. incentives for electric vehicles). This approach is to be welcomed. There is support for park and ride schemes in outer London that lead to a reduction in congestion, journey times and vehicle distances.

#### Orbital Transport Issues

45. Whilst recognising that Outer London to Outer London trips are the largest element of travel across London (39%), the draft London Plan and the draft Transport Strategy do not adequately address the issues raised in terms of integrating and supporting economic growth and transport. The draft Strategy states that it will support growth and intervention areas as identified in the London Plan but its reference case lacks the necessary detail and certain areas. Uxbridge, Hayes and Heathrow, are not covered at all. Policy 7 suggests only that increasing public awareness will increase orbital connectivity. Figure 24, although only illustrative, is both misleading and incomplete.

46. The proposals seek to ensure regular bus network reviews to cater for growth in population and employment, and to maintain good coverage. However this is caveated with a requirement for bus services to provide good value for money, which may be to the detriment of those communities in less dense areas within outer London, such as Hillingdon and specifically in areas such as Harefield. The bus

network reviews should take into account wider issues such as poor accessibility, deprivation, traffic congestion as well as value for money.

47. The draft Strategy states that London currently has a comprehensive orbital bus network, enabling direct orbital journeys between neighbouring centres in outer London, which is not true in Hillingdon, as shown in Figure 39 in the Strategy, which makes it clear that Uxbridge is very poorly connected to its neighbouring centres, particularly to the north and north-east. The draft Strategy is also factually incorrect in stating that there is low demand for public transport in Outer London (Paragraph 139). Demand for travel is mostly met by car because there is no alternative. Figure 39 could have included those orbital bus services which are required, including the one connecting Heathrow with Stockley Park, Hillingdon Hospital, Brunel University, Ruislip, Northwood and Amersham as identified during the West London Liaison meetings.

48. The draft Strategy recognises the need for orbital public transport and links to support Crossrail but has not allocated funds. As stated above, orbital public transport proposals in Hillingdon are completely lacking. It is a concern that West Ruislip is mentioned as the only named interchange whilst the interchanges of real interest, Uxbridge, Hayes and Heathrow are not even mentioned in the draft Strategy.

49. The draft Strategy could recognise Airtrack's potential to be extended to Hayes and Uxbridge as a West London Gateway opportunity for Wembley.

#### Uxbridge Metropolitan Town Centre

50. The London Plan identifies Uxbridge as a Metropolitan Town Centre and promotes Uxbridge as a growth area, Strategic Industrial Location and Centre of Higher Education. However the draft Strategy misses Uxbridge completely as part of the Western Wedge (Figure 7).

51. The Metropolitan Line and Piccadilly Line upgrades are overdue and very welcome but they will not address the need for measures such as the Central Line diversion to Uxbridge and the Uxbridge Station upgrade. It takes longer for people in Uxbridge to travel to and from central London than in any other Metropolitan Town Centre within and some outside London.

52. Uxbridge is deprived from attractive fast rail access in all directions, including central London. Very few locations can be reached within 20 minutes and the centre needs both new and much improved public transport routes to its neighbouring Metropolitan Town Centres including Hounslow, Ealing, Harrow, Slough, Staines and High Wycombe/Oxford. Uxbridge's status as a transport hub is in serious need of strengthening in line with the aspirations set out in the draft Strategy.

#### Heathrow Airport

53. The draft Strategy is very shallow in its discussion about airport capacity and fails to mention any other individual airport which serves London (Paragraph 438). London City and Biggin Hill serve particular niche roles which should be recognised whilst Gatwick, Stanstead and Luton plus Southend should be recognised as these play significant and potential roles. The draft Strategy only objects to airport capacity increase at Heathrow but offers no realistic solution as to how to achieve recognised

demand for increased capacity. It is a deficiency that the draft Strategy neither refers to a possible Thames Estuary airport nor other previous studies. It could reasonably be expected that the draft Strategy explores relevant proposals and a realistic way forward.

54. It is considered that the Mayor's support for High Speed Two should be subject to the proposals resulting in fewer short-haul flights to and from Heathrow and less traffic congestion on Hillingdon's roads.

#### Electric Vehicles.

55. Hillingdon Council welcomes and has actively supported the Mayor's electric vehicles initiative, which forms a significant element of the draft Strategy to reduce emissions. The Council is currently participating in a scheme to increase the number of charging points and maximise take-up.

#### Biking Borough

56. 80% of all car trips both start in Outer London and finish within Outer London, many of which are shorter than 2 miles. The draft Strategy targets such trips through the Biking Boroughs initiative inviting boroughs to focus on local centres with an emphasis on safety, space reservation and initiatives such as Cycle Friday despite mixed media support. This is an initiative that Hillingdon would support.

## APPENDIX 3

### The Mayor's Transport Strategy Public Draft, Oct 2009

#### Hillingdon's response

##### 1. Managing and enhancing the transport system

**Q:**

***A range of proposals are set out in the draft strategy to manage and enhance London's transport system. For each of the areas below, please give your views on the measures proposed and the top priorities. Please also describe any other measures that you think should be included in the strategy to manage and enhance our transport networks and services***

**A:**

##### *General*

1. The recognition in the draft Strategy that different areas of London require different policy interventions is welcomed. Outer London proposals need to acknowledge the role of the car, particularly for medium to longer distance trips, and the encouragement of using cleaner, low emission cars.
  2. The prioritisation for Outer London of town centres, measures to improve bus accessibility, public realm, walking and cycling is also welcomed.
  3. The Mayor's draft Transport Strategy policies and proposals lack clarity in terms of funding potential for schemes for West London in general and Hillingdon in particular. There are real concerns about how well the London Plan and the Mayor's Strategies for Transport and Economy will deal with the opportunity areas which are proposed in the draft Revised London Plan and being considered by the West London Alliance.
  4. There is concern that the draft Transport Strategy does not clearly define transport need, nor clarify the relationship between needs analysis and proposals, masking the transport issues of real concern within the London Borough of Hillingdon. The draft Strategy lacks a clear 'skeleton' proposal within which Hillingdon can develop its own proposals. There is therefore concern that the final proposals will not properly consider Hillingdon's transport needs and that suitable schemes may not be eligible for funding within the emerging West London sub-regional transport plan.
  5. With regard to parking, there is support for variation of parking charges, not only by location and duration of stay, but also by the environmental impact of the vehicle (e.g. incentives for electric vehicles). This approach is to be welcomed.
  6. The London Borough of Hillingdon needs a structural orbital public transport provision addressing its long and narrow orbital shape. There is concern that this issue is not specifically addressed in the draft Strategy.
  7. The Draft London Plan designates Hayes as a growth area and Uxbridge as a growth area, industrial development area and centre of higher education without supporting provision for transport infrastructure.
  8. Uxbridge needs a range of measures so that it is connected directly and attractively, ideally by rail, with all its neighbouring Metropolitan Town Centres, central London, immediate surroundings and retail catchment area, including within Buckinghamshire. Very few destinations are reachable from Uxbridge by public transport within 20 minutes (i.e. poor Public Transport Accessibility Levels).
-

9. The Hayes – West Drayton economic redevelopment area lacks orbital public transport access, especially direct connections with the area north of the A40 and the south west.

### **1a National Rail, Crossrail, London Overground, DLR, Tramlink (5.2)**

#### **A:**

1. The commitment to a range of improvements to the rail network is welcomed, although there is concern that the majority of specific improvements referred to will not improve services in Hillingdon. With respect to station capacity enhancements, a number of specific stations are mentioned but none in Hillingdon, which is a concern (proposal 11).
2. In terms of public transport, Uxbridge is the worst accessible Metropolitan Town Centre in London, suffering from poor rail access from all directions, including the east (Figures 18, 27 and 32). A step change improvement is needed to achieve a level of access commensurate with that of a Metropolitan Town Centre.
3. The Council is extremely concerned with the transport provision to/from Uxbridge. Its quality of rail access appears worse than for any other Metropolitan Town Centre in London. Uxbridge has effectively no public transport access to its key catchment area, the triangle Uxbridge – High Wycombe – Amersham, and its neighbouring Metropolitan Town Centres Slough, Watford, Staines, Hounslow and Ealing, and central London.
4. Airtrack could be extended to Hayes creating a direct link the southwest including Staines, Guildford and Woking.

### **1b London Underground (5.3)**

#### **A:**

1. It is encouraging that the Metropolitan Line is due for an upgrade in its fleet and signalling. Hillingdon Council is aware that the journey time between Uxbridge Metropolitan Town Centre and the City of London is the worst in London and distinctly worse than to places like Slough and Reading outside London. Travel to/from Bank takes more than one hour and Uxbridge's PTAL values are relatively poor. Hillingdon Council is keen that the Mayor's public transport measures will drastically improve Uxbridge's PTAL values and journey time / reliability for trips to/from central London.
2. The Mayor's draft transport strategy fails to propose any transport infrastructure to support proposals in the London Plan to strengthen and grow Uxbridge's importance as a Metropolitan Town Centre, growth area, centre of higher education and industrial area.
3. Uxbridge needs to be included in the Western Wedge and explicitly shown in the draft Strategy Figure 7.
4. The arrow to Uxbridge in Figure 3 is misleading. Potential has to be explored to fully divert the Central Line from West Ruislip to Uxbridge.
5. The current business case for the Central Line diversion to Uxbridge does not appear to include projected growth, an issue which needs further consideration. Additional ridership associated with both new developments and rectifying the under-representation of trips by rail (potential modal change) can increase the capitalised benefit to justify the costs of the diversion currently estimated at £32m.



6. The contract to upgrade the signalling along the Metropolitan Line could, for example, include a requirement that signalling be made compatible with the system on the Central Line as a first step.

### **1c London's bus network (5.4)**

#### **A:**

1. There is concern that the proposed requirement for bus services to provide good value for money may be to the detriment of those communities in less dense areas within outer London, such as Hillingdon and specifically in areas such as Harefield. It is considered that the bus network reviews should take into account wider issues such as poor accessibility, deprivation, traffic congestion as well as value for money.
2. The draft Strategy states that London currently has a comprehensive orbital bus network, enabling direct orbital journeys between neighbouring centres in outer London, which is not true in Hillingdon. Figure 39 in the Strategy makes it clear that Uxbridge is very poorly connected to its neighbouring centres, particularly to the north and north-east. The draft Strategy is also factually incorrect in stating that there is low demand for public transport in Outer London (Paragraph 139). Demand for travel is mostly met by car because there is no alternative. The draft Strategy should include those priority orbital bus services which are required, including the one connecting Heathrow with Stockley Park, Hillingdon Hospital, Brunel University, Ruislip, Northwood and Amersham as identified in the West London Liaison meetings.
3. The draft Strategy recognises the need for orbital public transport and links to support Crossrail but has not allocated funds. As stated above, orbital public transport proposals in Hillingdon are completely lacking. It is a concern that West Ruislip is mentioned as the only named interchange whilst the interchanges of real interest, Uxbridge, Hayes and Heathrow are not even mentioned in the draft Strategy.
4. Hillingdon's bus network lacks a clear and robust structure (Figure 39). It needs to be focused on north south journeys, complementing its current focus on the A4020 Uxbridge Road and other more local routes.
5. The 222 bus service is the only link between Uxbridge and Hounslow Metropolitan Town Centre. The service could benefit from a full re-vamp addressing all aspirations mentioned in the proposals including incentivised contract, fleet operating on hydrogen and the proposed new London double-decker bus. It is currently crowded, slow, unreliable and very unattractive and lacking driver courtesy, inappropriate fleet and sub-standard waiting facilities at key locations.
6. An early review is needed both to enable the projected growth as set out in the London Plan and to improve Uxbridge's PTAL values. The Council is very keen to see early results from current discussions with Transport for London and particularly keen to introduce fast, frequent high quality bus services linking the key destinations in the north with those on the south of the borough.
7. The Council is interested in developing bus priority measures at critical locations within the borough as long as local residents can be convinced that the benefits outweigh the disbenefits and that quality of life improvements are demonstrably compensated to those affected.
8. The draft Transport Strategy needs to explicitly refer to demographic details and transport need. Bus route planning criteria and modal change

management tools are lacking or insufficient. It is a concern that carbon intensive (long-distance) commuter, travel and visitor travel, and fleet and goods movements are not addressed.

#### **1d Taxis, private hire, coaches and community transport (5.5)**

**A:**

1. London's taxis provide probably the most distinctive service but it appears factually incorrect that it is the best in the world. Taxi driver attitude is of considerable concern especially in the Heathrow area where reluctance exists to service clients with a local destination. Considerable user feedback suggests that the London taxi driver attitude is in need of significant improvement (by means of a charter) especially when compared with courteousness experienced in numerous (capital) cities throughout the world. Such a charter could be linked with driving a zero-emission taxi.
2. Heathrow could be appropriately considered as a pilot for a zero taxi emission area.
3. Public transport provision will have to increasingly address the growing number of elderly people and the responsive door to door transport demand. Proposal 29 of the draft Strategy could be strengthened by actively referring to use of technology such as mobile phone, SatNav and GPS whilst placing increasing importance on the role of community transport. Community transport solutions could be considered for funding by combining initiatives to increase fast frequent public transport services on principal demand corridors and substituting local services on local routes

#### **1e Managing the road network (5.6)**

**A:**

1. Hillingdon Council supports the Mayor in his initiatives to make best use of intelligent traffic control systems to maximise capacity within the existing transport infrastructure. Considerable potential appears to exist to make best use of underused infrastructure and provide benefits for buses and pedal cycles during peak periods, especially on four lane dual carriage ways including Park Road, Swakeleys Road and Uxbridge Road.

#### **1f The Blue Ribbon Network (5.7)**

**A:**

1. The proposals in the draft Strategy to maximise passenger and freight services on London's waterways are welcomed. The proposals seek to better integrate river services into the overall transport network, and look to increase the use of the Thames and the canal network for waterborne freight.
2. Canals could be mentioned explicitly for the provision of boat yard facilities. Hayes and West Drayton town centres are prime candidates.
3. Potential could be identified and used to actively integrate canals and tow paths in their surrounding environment.

#### **1g River crossings (5.8)**

**A:**

1. Canal bridges could help tremendously in improving responsiveness to desire line for people who walk and cycle, especially in the vicinity of major traffic generators and railway stations (West Drayton).

### **1h A more accessible transport system (5.9)**

**A:**

1. Proposal 42 could explicitly include taxi drivers' attitude. Hillingdon residents have a problem at Heathrow because many drivers are very reluctant to offer them a journey. Drivers are, for example, known to congregate and urinate in a selection of residential streets when taxi ranks are lacking or over-subscribed. Moreover driver courtesy could be addressed as BAA Heathrow is already doing in the run up to the 2012 Olympics.
2. TfL could consider actively supporting the Community Transport Association (CTA) when considering structural demand responsive transport solutions. A funding strategy could be developed so that demand responsiveness improves, possibly in exchange for a reduction in the number of (empty) local buses on local routes, creating potential for making streets even safer to play for the young and reside for the old. Such services could appropriately complement a network of fast frequent high quality bus services on key corridors where fit people would be happy to walk a little extra for (see 1e1 above).

### **1i Integrating London's transport system and services (5.10)**

**A:**

1. Hillingdon Council supports the Mayor's aspiration to provide interchange opportunities before central London. Heathrow is an international hub with the UK's second largest coach station, the Heathrow Express, imminent access to Airtrack, probably HS2 and the Piccadilly Line. The Council is currently promoting upgrading Hayes Station as a bus / train interchange using the Crossrail proposal and local regeneration initiatives as an incentive to kick-start the project.
2. Uxbridge bus/underground interchange needs a significant upgrade before it can fully encourage public transport use. There is a need for suitable bus shelters, display boards and departure time information. Way-finding between train and bus is both difficult and uninviting. Uxbridge needs, therefore, to be listed explicitly as a station to be upgraded as a Gateway to the Olympics in general and to Wembley Stadium in particular, albeit that the Underground services need to be brought up to a decent standard. The Council is keen to explore such opportunities with the Mayor as soon as possible.
3. Outer London to Outer London trips are recognised as the largest element of travel across London (39%). However the draft London Plan and the draft Mayor's Transport Strategy do not adequately take on board the recommendations of the Outer London Commission. Although the draft Strategy states that it will support growth and intervention areas as identified in the London Plan, its reference case lacks the necessary detail and areas such as Uxbridge, Hayes and Heathrow are not covered at all. Policy 7 suggests only that increasing public awareness will increase orbital connectivity.

### **1j London's airports (5.11)**

**A:**

1. Hillingdon Council very much welcomes the Mayor's clear opposition to capacity increases at Heathrow Airport.
2. It is considered that the Mayor's support for High Speed Two should be subject to the proposals resulting in fewer short-haul flights to and from Heathrow and less traffic congestion on Hillingdon's roads.

## 2. Encouraging more cycling and walking

**Q:**

**2a (5.12) A range of proposals are set out in the draft strategy to bring about a cycling revolution. Please give your views on the measures proposed and the top priorities.**

**A:**

1. The London Borough of Hillingdon is understood to have the largest cycle network in London. The Council is very interested in developing and upgrading the network and fostering more ridership through becoming a Biking Borough with improved cycle facilities.
2. The Council is already working on a secure cycle parking strategy for Uxbridge with a view to extending the strategy across the borough.
3. Cycling can be quite attractive in Hillingdon despite being London's most western Outer Borough. The cycling journey between Uxbridge and Heathrow takes, for example, typically only half an hour which is, arguably, faster than by any other mode of transport. Pro-active marketing and monitoring opportunities could be identified at both personal and project focused level, for example to raise awareness of the journey time advantages.

**Q:**

**2b (5.12 duplicate) Please also describe any other measures that you think should be included in the strategy which would encourage more cycling.**

**A:**

1. Cycle parking standards can be provided at four levels: 1) simple stands (including under cover), 2) lockers, 3) supervised and 4) supervised with all ancillary facilities including showers, repair workshop, hire facilities and information centre. It is important that both the quality and quantity of cycle parking facilities is specified by location and tailored to (latent) demand in all relevant planning and design guidance documents

**Q:**

**2c (5.13) A range of proposals are set out in the draft strategy to make walking count. Please give your views on the measures proposed and the top priorities.**

**A:**

1. Hillingdon Council wishes to register Uxbridge to become a Legible London project as soon as it is rolled from central London. Legible London is a 'wayfinding' project to help pedestrians find significant destinations by providing high quality maps and information.

**Q:**

**2d (5.13 duplicate) Please also describe any other measures that you think should be included in the strategy which would encourage more walking.**

**A:**

1. Ample opportunities exist to promote walking in Hillingdon further through Legible London. Hayes and Yiewsley / West Drayton are further examples for rolling out Legible London. Brunel University has considerable interest in being associated

with Legible Uxbridge where it is already leading an area-wide travel plan partnership in an exemplary manner.

### **3. Improving London's environment**

**Q:**

***A range of proposals are set out in the draft strategy to improve London's environment. For each of the areas below, please give your views on the measures proposed and the top priorities:***

#### ***3a Creating 'better streets' (5.17)***

**A:**

1. It would be helpful if the draft Strategy provided guidance on preparing and funding access proposals for town centres, opportunity areas and major developments. It could include guidelines on developing a clear and a comprehensible public transport network, 20 mile/hr zones, shared-surface schemes and the role of parking standards / provision in achieving proposed outcomes.
2. Hillingdon Council supports the intention to introduce a transport strategy throughout London on the basis of a framework of limited objectives, supplemented by more detailed objectives for each town centre and "transport areas" yet to be defined within the borough.

#### ***3b Improving noise impacts (5.18)***

1. Hillingdon Council recently sent a response to a consultation from BAA on Heathrow Airport's Environmental Noise Directive Action Plan, which does not address Runway 3 at Heathrow Airport.

#### ***3c Enhancing transport's contribution to the natural environment (5.18 & 5.19?)***

**A:**

1. Hillingdon Council is keen to promote an integrated approach with the Mayor's Air Quality Strategy and the Transport Strategy, ideally making it a common theme to address environmental issues.

#### ***3d Improving air quality (5.19)***

**A:**

1. The proposed transport strategy does not bridge the gap between the projected CO<sub>2</sub> emission reduction estimate and target (Figure 58) which is a concern.
2. The Mayor could consider introduction of more aggressive vehicle efficiency initiatives as these appear to offer the single most effective solution. Zero emission taxis and buses could be considered initially, possibly followed by all vehicles in central London and Heathrow before 2020.
3. Hillingdon Council welcomes and has actively supported the Mayor's electric vehicles initiative, which forms a significant element of the draft Strategy to reduce emissions. The Council is currently participating in a scheme to increase the number of charging points and maximise take-up.

**3e Please also describe any other measures that you think should be included in the strategy to improve London's environment. (5.17, 5.18 and 5.19 duplicate)**

**A:**

1. Specific proposals need to be developed to address the ground operation at Heathrow given that it is the single most important pollutant in west London.
2. Potential could be explored to allow zero emission taxis into Heathrow airport.

#### **4. Improving safety and security**

**Q:**

**A range of proposals are set out in the draft strategy to improve safety and security. For each of the areas below, please give your views on the measures proposed and the top priority:**

##### **4a Improving public transport safety (5.14)**

**A:**

1. The promotion of increased membership of the Freight Operator Recognition Scheme is welcome. A similar scheme could be considered for taxis.

##### **4b Improving road safety (5.15)**

**A:**

1. Hillingdon Council welcomes the Mayor's ongoing commitment to road safety.

##### **4c Reducing crime, fear of crime and antisocial behaviour (5.16)**

**A:**

1. Hillingdon Council welcomes the establishment of the statutory community safety partnership for transport and travelling in London with its associated rolling three year strategy to tackle crime and antisocial behaviour. The Council would welcome advice on how to integrate a 'joint intelligent unit' (Proposal 74c) as a partner in developing its Area Based Schemes.
2. Night time safety on public transport is being perceived as a serious issue. Numerous stations are effectively unmanned at night with gates left open for the travelling public allowing malpractices to take place without intervention and escalate. Improvements for night time public transport services are much welcomed (Proposal 80a).

##### **4d Responding to the threat of terrorism (5.16 duplicate)**

**A:**

1. The proposals in the draft Strategy regarding the threat of terrorism are supported.

**4e Please also describe any other measures that you think should be included in the strategy to improve safety and security. (5.16 triplet)**

**A:** Please refer to comments under 4c above.

#### **5. Reducing transport's contribution to climate change and improving its resilience**

**Q:**

**5a A range of proposals are set out in the draft strategy to reduce CO2 emissions. Please give your views on the measures proposed and the top priorities. Please also describe any other measures that you think should be included in the strategy which would reduce transport's contribution to climate change. (4.6 & 5.20)**

**A:**

1. The proposals in the draft Strategy may reduce CO2 emissions but nevertheless they will still leave a gap requiring further initiatives (Figure 58). Being the borough with the biggest polluter in London, Hillingdon Council is taking a lead in systematically reducing CO2 emissions using TEEM and WLTM software as a monitoring tool. Boroughs could be encouraged to monitor their respective footprints in a similar manner in due course.

**Q:**

**5b A range of proposals are set out in the draft strategy to increase the resilience of the transport system and adaptation to climate change. Please give your views on the measures proposed and the top priorities. (5.21)**

**A:**

1. The draft Strategy does not address emergency incident issues. The Pitt review identified – following the Gloucester flooding experience - the need for all partners in the emergency sector to respond to such incidents. MTS2 could actively promote developing and using a multi-agency tool to streamline communication and information supply enabling key people to be immediately pro-active in a most effective manner as and when incidents occur.

**Q:**

**5c Please also describe any other measures that you think should be included in the strategy which would improve resilience to climate change. (5.21 duplicate)**

**A:**

1. The draft Strategy needs to encourage public transport operators to develop and implement contingency plans to deal effectively with any realistic short term incidents and inform the travelling public accordingly as a matter of course, especially when they are already in transit.

## **6. Managing the demand for travel**

**Q:**

**A range of proposals are set out in the draft strategy to manage the demand for travel. For each of the areas below, please give your views on the measures proposed and the top priorities:**

### **6a Better journey planning and information (5.22)**

**A:**

1. See above

### **6b Smarter transport for both people and freight (5.22 duplicate)**

**A:**

1. Freight transport issues appear under-represented in the draft MTS2. The pressure for additional freight transport and current problems are so serious and different from passenger transport issues that freight transport merits its own chapter.
2. The promotion of efficiency initiatives through delivery and service plans, construction logistics plans and Freight Operator Recognition Scheme (proposal 19) is welcome.
3. The break bulk facility / consolidation centre idea needs firm and suitable encouragement (proposal 118) as big lorries in small roads are an increasing problem in need of more explicit attention. Potential to use electric small goods vehicles should be used to maximum benefit.
4. An active marketing strategy building upon the feel good aspects of smarter travel could form an integral part of the transport strategy.
5. The strategy could explicitly address the Slough International Freight Exchange currently at planning application stage and registered with Slough Borough Council (paragraph 248).
6. Potential traffic generation associated with High Speed Rail freight and the Slough International Freight Exchange could be used as an opportunity to reduce road freight contribution to London's CO<sub>2</sub> emissions.

### **6c Fares and ticketing (5.23)**

**A:**

1. Hillingdon Council welcomes the proposal that concessionary fares are focused effectively on need and linked with good behaviour (Proposal 120).

### **6d Parking and loading (5.24)**

**A:**

1. Hillingdon Council welcomes the Mayor's commitment to fair and consistent parking and loading regulations and enforcement.
2. Pricing differential should not only be based on vehicle emissions but also on the level of congestion in the area and its surrounding roads.
3. The proposal that parking charges should vary not only by location and duration of stay, but also by the environmental impact of the vehicle is welcomed.

### **6e Please also describe any other measures that you think should be included in the strategy to manage the demand for travel. (5.25)**

**A:**

None to add.

## **7. Western Extension zone**

**Q:**

***The draft strategy proposes to remove the Western Extension to the Congestion Charging scheme and introduce measures (including improved traffic control systems and a roadworks permit scheme) to mitigate as far as possible the impact of its removal. To what extent do you agree or disagree with the proposal to remove the Western Extension? (5.25 duplicate)***



**A:**

1. It is considered that the Mayor has demonstrated that the western extension will lack effectiveness. There is support for the alternative proposed measures to clean up the air, improve the quality of life for residents and smooth the traffic.

## **8. Priorities**

**Q:**

***Of all the different measures that are proposed, please give your views on what the top priorities are for London. (7)***

**A:**

1. Hillingdon's Sustainable Communities Strategy six top priorities are as follows:
  - a. Improve health and wellbeing
  - b. Build strong and active communities
  - c. Protect and enhance the environment
  - d. Make Hillingdon safer
  - e. Strengthen a thriving economy
  - f. Improve aspiration through education and learning
2. Hillingdon Council will seek to ensure that the above priorities are met vigorously and consistently.

## **9. Road user charging for economic and environmental aims**

**Q:**

***Despite all the improvements outlined in the draft strategy, increasing population and demand for travel means congestion and CO2 emissions might still be a significant problem for London. The draft strategy proposes that in this case it may be necessary to introduce a fair system of road user charging to reduce congestion. To what extent do you agree or disagree that a fair system of managing demand for road use should be used if necessary? (5.25)***

**A:**

1. Hillingdon Council agrees that a fair charging system of managing demand for road use should be used. It should form part of an integral approach of offering choice to all residents, workers and visitors in London, whilst paying for scarcity and damage caused by the journeys for them and their goods.
2. Public authorities have an obligation to manage scarcity fairly and minimise damage to an absolute minimum.

## **10. Are there any areas proposed that you disagree with?**

**Q:**

***The Mayor's Transport Strategy sets out six strategic goals for London. Please give us your views on the extent to which you think the measures set out in the strategy will assist in meeting these. (2.1)***

**A:**

1. The draft strategy is generally well written and the proposed measures are considered against the goals.

2. The measures will go a long way towards achieving the Mayor's aspirations, albeit that more specific measures are needed within Hillingdon to ensure that the outputs and expected outcomes are consistent throughout London.
3. Measures such as provision of public orbital transport, interchanges at Uxbridge and Hayes, and access to the retail catchment area to the north west of Uxbridge need considerably more development.

## APPENDIX 4

### Rising to the Challenge – the Mayor’s Economic Development Strategy for Greater London, Public Consultation Draft (Oct 2009)

#### Key Provisions and Issues for Hillingdon

##### Background

1. The Mayor’s Economic Development Strategy (EDS) sets out the Mayor’s ambitions for the economic development of the capital, setting out policy directions and priorities up until 2031. Rising to the Challenge (Oct 09) outlines proposals for London under five headline objectives:

- Objective 1: To promote London as a city that excels as a world capital of business.
- Objective 2: To ensure that London has the most competitive business environment in the world.
- Objective 3: To drive London’s transition to a low carbon economy and to maximise the economic opportunities this will create.
- Objective 4: To give all Londoners the opportunity to take part in London’s economic success, access suitable employment and progress in their careers.
- 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.

##### Response to the Five Objectives

2. **Objective 1: To promote London as a city that excels as a world capital of business.**

- Welcome LDA support through Visit London, and Think London to link more closely with plans for optimising investment,
- Support for positioning and promoting London for global competitiveness, particularly maximizing the economic potential of outer London boroughs such as Hillingdon,
- Endorse approach to development of business parks such as Stockley Park presenting opportunities to progress green transport options (eg. canal & cycling routes) and improved connectivity to a local workforce and district centres,
- Suggest the contribution of the expertise of Visit London and Think London to maximise the potential of dedicated space at Terminal 2 for the promotion of West London.

3. **Objective 2: To ensure that London has the most competitive business environment in the world.**

- Acknowledge that support for small and medium enterprises is key to creating business competitiveness - such as Hillingdon’s 3-year Heathrow Area Supply Chains programme, supporting small and medium enterprises to access major local supply chains at Heathrow Airport and within the public sector
- Express concern regarding the reduced investment within the Business London programme at a time when referrals from Business Link in London are escalating due to the economic downturn.

- Suggest LDA should be working much more closely with the London boroughs to ensure that the Business London programme responds to local need - ensuring that public funded business growth and retention programmes are truly effective.
- Request that the Department for Work & Pensions provide support for our residents using redundancy payments to become self-employed or start businesses

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

- Strongly support measures for a low carbon economy – exemplified by various energy saving initiatives in Hillingdon's Birchway eco-homes project,
- Endorse opportunities for cross borough projects such as our joint work with London Councils' and GLA on London's retro-fitting housing programme.
- Welcome opportunities to work with the Mayor on zero-carbon car initiatives.

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

- Welcome opportunities for a wide range of employability measures. West London Working's (the City Strategy Pathfinder) most recent Employment Bulletin shows that of the 11,600 redundancies notified (Oct 2008 to May 2009) more than 55% (6,437) are from businesses located in Hillingdon near Heathrow, mainly in Information Technology, Air Transport / Transportation and Manufacturing.
- Within Hillingdon, residents claiming key out of work benefits is now at a record level of 18,840 (NOMIS data since April 1999). What this means is that an increasing number of Hillingdon residents are at greater risk of social exclusion (for example: care leavers, offenders under probation supervision, adults in contact with mental health services and adults with moderate to severe learning disabilities) and face greater discrimination and further marginalisation within a highly competitive labour market.
- Our residents need a range of employability measures with a much stronger focus on recession economics, which will support our newly redundant, highly skilled residents swiftly back into employment whilst also providing intensive support for our long-term workless residents.
- Outcome targets may need to be realigned to take into account the changing recruitment business need i.e. more flexible, short-term or consultancy-based contracts.
- Employer-led training may not be the accredited training programmes traditionally funded by the Learning Skills Council. This is especially true of the construction sector, where we need to focus on ensuring that demands for emerging technological and sustainability related skills are met so that residents are skilled-up to fill real opportunities within hotel/retail/leisure/airport construction sectors.
- We would also welcome the assistance of the Mayor in ensuring the information from central government and Jobcentre Plus regarding employment initiatives, particularly those aimed at young people is clear and readily available. It is currently extremely difficult, especially for small local employers, to find out about schemes which are often linked to short-term

funding streams. Clearer sub-regional commissioning arrangements would assist in this regard.

**6. 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.**

- We recognise that Hillingdon will be the main Gateway for the majority of overseas visitors resulting from the 2012 Olympic and Paralympic Games and its legacy.
- The Gateway Heathrow 2012 programme is now underway supporting London residents living closest to Heathrow to gain the skills and experience required within the Hospitality, Leisure, Travel & Tourism sector.
- Putting residents at the heart of our town centres is the Hillingdon approach in terms of sustaining our town centres.
- Our Hillingdon First residents' card offers discounts on local goods and services, encouraging people to shop locally and use local services.
- The Hillingdon model of town centre development started in Northwood and is being developed in Yiewsley and West Drayton. It is being rolled forward and this is a good basis for the GLA to support Outer London boroughs to ensure that town centres benefit from growth and regeneration.

**General Comments**

7. The signing of the London City Charter in April 2009 set out a shift culture change in the way that the Mayor, Borough Leaders and London Councils work collectively for the overall good of London and Londoners. The agreement included ambitions such as to 'seek the maximum feasible devolution of services and spending to the region, and to boroughs and groups of boroughs'. As there is no reference to the London City Charter within the Mayor's Economic Development Strategy, it is difficult to gauge how the London Development Agency perceives closer collaboration and transparent decision-making working in practice.

8. From direct experience of contracting directly with the LDA for our European Social Fund (ESF) Gateway Heathrow 2012 and European Regional Development Fund (ERDF) Heathrow Area Supply Chain programmes, standard grant conditions agreed between the LDA and London Councils would be a more efficient way of contracting. It would also mean that actual performance and impact of LDA commissioned programmes are not adversely jeopardised through time delays. There is also a concern that the LDA has become so risk averse that smaller niche, specialist providers, particularly 3rd sector providers, are excluded from programme delivery either because of over burdensome tendering/contracting procedures or through cash-flow difficulties which output funded contracts present.

9. We would welcome more detail in terms of how the Mayor proposes to work with neighbouring regions and across Regional Development Agencies. Development of Pinewood Studios will have a significant impact on the studios' nearest metropolitan centre – Uxbridge and likewise Uxbridge Business Park where major global companies such as Amgen, Bristol-Myers Squibb and Cadbury are located. Yet Pinewood comes under SEEDA (South East Economic Development Agency) in terms of inward investment and business retention.

10. Until the issue of data sharing is properly addressed, the Mayor's aspirations for personalised and joined-up services to help people into employment and careers cannot be realised. As an example, take up of the childcare element of working tax credit has fallen in West London, bucking the national trend. This may be due to the availability of the type of childcare that qualifies for the childcare element and irregular hours of work e.g. high proportion of part-time and evening work in London when qualifying childcare is less likely to be available and harder to arrange. We know that HM Revenue & Customs (HMRC) have written directly to Hillingdon residents about the 100% subsidy through the Childcare Affordability Programme 09 (CAP 09) pilot but have not been able to let us know how they have targeted this. In addition the council is required to hold data on separate accounts for housing needs, council tax, and housing benefit/council tax benefit. This causes barriers to work and creates avoidable contact with residents.

### **Cross-Cutting Links to London Plan and Mayor's Transport Strategy**

11. Worklessness among parents is a major contributor to child poverty. Tackling child poverty requires co-ordinated action across welfare to work, education and skills, transportation, housing, health, etc. It is important to ensure that work undertaken by TfL on transport barriers to employment is progressed so that areas of deprivation are sufficiently connected to employment areas and that housing, employment and childcare are within walking/cycling or public transport access.

12. The Local Authority Tourism Impact Model report is produced annually by the LDA, providing borough-level estimates of tourism volume and value to inform tourism policy development, investment and marketing. The most recent (July 2009) report shows that Hillingdon received an estimated total of £697 million in tourism spending in 2007, £326 million of which was spending by overseas visitors. This equates to a third of all overseas tourism spend within the West London sub-region for the same period – evidence of the importance of tourism and the visitor sector within Hillingdon in terms of employment and the borough's overall economy. The vast majority of West London's hotel accommodation is located within 2 miles of Heathrow, with significant hospitality employment growth forecast.

13. Preparation for the upturn. The economic downturn has had severe consequences within Hillingdon. The Jobseekers Allowance (JSA) claimant rate has effectively doubled from 3,149 claimants (2% of the working age population) in October 2008 to 6,233 claimants (3.9%) in October 2009. Over 70% (4,425) of JSA claimants within Hillingdon are new claims, made within the last 6-months (NOMIS data October 09). There is a significant gap between the skills level of Hillingdon residents (just 24.4% qualified to NVQ4 or above, compared to London average 38.6%) and the skill requirements of the knowledge/ICT sector is prominent within Uxbridge and Stockley Park adding to the high inward commuting in Hillingdon.