

## WEST LONDON ALLIANCE

### PLANNING POLICY OFFICER'S GROUP

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## West London Alliance

# Planning Policy Officers' Group

meeting notes of 24 January 2019 **draft**

**Present:** Steve Barton (chairing, Ealing); Nick Lynch (Barnet); Paul Lewin (Brent); Sam Cuthbert, Ian Weake (Ealing); David Hughes (Harrow); Isabelle Haddow (Hammersmith and Fulham); Julia Johnson, Tom Campbell (Hillingdon); Luke Ward, Andrew Barry-Purssell (WLA).

**Apologies:** Michael Thornton (HSPG); Tom Cardis, Peter Farnham (OOPDC); Alison Bradshaw (TfL)

ITEMS / ACTIONS	LEAD
<b>1. Chair's welcome and previous notes</b> Steve Barton (SB) gave a welcome. The note of the previous meeting (18 October 2018) would be circulated separately.	SB/ABP
<b>2. National Planning</b>  <b>NPPF:</b> Judgement in the Friends of the Earth legal challenge to the new National Planning Policy Framework was expected imminently.  <b>National Housing Need Methodology:</b> Updated guidance and a revised NPPF were outstanding, but might not be issued soon or provide the necessary level of certainty. A further announcement on the <b>Housing Delivery Test</b> was also awaited.  <b>National Planning Practice Guidance:</b> New NPPG on issues like housing, design, density and green belt was expected.  <b>Letwin Review on build out rates:</b> The Government's response to the report was expected to be published in February.  <b>CIL Regulations:</b> MHCLG was consulting on proposed amendments to the Community Infrastructure Levy Regulations to put in place the changes previously consulted on in March 2018. Brent were responding generally welcoming the proposals. Andrew Barry-Purssell (ABP) said that he was intending to respond as a private individual; he also welcomed most of the proposals but had some concerns about the scope of the proposed Infrastructure Funding Statement – as drafted the regulations could impose quite onerous requirements on charging authorities.  <b>ACTION</b> – ABP to circulate his proposed response to see whether it could form the basis of an agreed WLA submission.  <b>Mayoral CIL:</b> It was noted that the Mayor's revised CIL would come into force from 1 April.  <b>MHCLG "Supporting the High Street" consultation:</b> The consultation on proposals to extend permitted development rights for town centre uses closed on 14 <sup>th</sup> January. It was noted that the proposals militated against the "curated" town centre approach.  <b>DEFRA consultation: biodiversity net gain:</b> The Department for the Environment, Food and Rural Affairs has issued a consultation document on 2 December. The deadline for comments is 10 <sup>th</sup> February.	ABP

<p><b>Heathrow Airspace and Future Operations Consultation:</b> Heathrow were consulting on changes to airspace and new flightpaths between 8<sup>th</sup> January-4<sup>th</sup> March. A series of consultation events was being held. Formal consultation on the proposed extension would take place in June.</p>	
<p><b>3. Regional Planning</b></p> <p><b>a) London Plan Examination in Public: Matters, attendance and emerging issues</b></p> <p>The WLA written statements for Matters M19, M20 and M28 were noted. Hillingdon said that they had been represented at EiP sessions dealing with the duty to cooperate, raising issues including borough engagement with the London Strategic Housing Land Availability Assessment's treatment of small sites. They had also attended the session dealing with spatial distribution. It was clear that the Panel was particularly interested in the Integrated Impact Assessment and the extent to which alternatives had been considered and in finding ways forward, such as engagement with neighbouring regions and the case for a strategic review of green belt.</p> <p>The housing matters of particular concern to the WLA would start discussion in the first week of February. It was clear that the Panel would be more interested in detailed, evidenced points rather than general complaints. Hot seating arrangements were not straightforward. It was agreed that there should be a dedicated meeting to discuss tactics and how hotseating would be organised on 31 January. Troy (the consultants who prepared the West London Small Sites SHLAA would be asked to attend.</p> <p><b>ACTION-</b> The meeting to discuss tactics for the London Plan housing EiP sessions would be held on 31 January at Ealing. The EiP Programme Officer should be informed of the proposed hotdesking arrangements following the meeting.</p> <p>ABP said that it was proposed to submit a non-participants statement supporting the West London Orbital for Matters M76-77 (Transport Schemes and Development). He also offered support to those attending the session dealing with industrial land (Matter M62).</p> <p><b>b) Mayor's Homebuilding Capacity Fund</b></p> <p>The deadline for submitting bids to the fund was 25<sup>th</sup> January.</p> <p><u>Ealing</u> had submitted bids for a small sites characterisation study and a housing capacity study for Northolt.</p> <p><u>Hillingdon</u> had bid for work on intensification of industrial land and a project manager for their council house-building programme.</p> <p><u>Barnet</u> had submitted a bid for masterplanning Edgware town centre, jointly with Harrow. They had also submitted two housing-led bids.</p> <p><u>Hammersmith and Fulham</u> had bid for work on small sites capacity and delivery, member training and 3D visualisation modelling. They had made housing-led bids for training and a project manager.</p> <p><u>Brent</u> had put in a proposal for masterplanning in Neasden.</p> <p><u>Harrow</u> had put in bids for a small sites design code and characterisation study, a feasibility study of the potential for upwards extensions to provide new homes and housing delivery project management as well as the joint Edgware bid.</p> <p>It was noted that MHCLG would be issuing the prospectus for the next round of Planning Delivery Grant in April 2019. There was a discussion of possible elements of a new bid. These might include further evidence base work on: digital infrastructure; retail and town centres; a review of barriers to housing delivery in West London; viability and housing</p>	<p><b>ABP</b></p>

affordability; and the sub-region's key clusters and sectors. There could also be work on opportunities from new methods of construction and support for boroughs in meeting the duty to cooperate, including across sub-regional/Greater London boundaries.

**ACTION-** The outcome of the HCF bids would be discussed at the next meeting.

**ACTION-** The Planning Delivery Grant prospectus would be discussed at the next meeting. Any further ideas for the next round of Planning Delivery Grant in the meantime to be sent to ABP

**ALL/ABP**

#### 4. Sub-regional planning

##### a) Joint Evidence Base

It was noted that the Small Sites SHLAA and the West London SHMA and Gypsy and Travellers Accommodation Needs Assessment had been published.

A draft of the Employment Land Assessment has been received, but was of sufficiently poor quality that it was unfit for publication. There would be a meeting with the consultants to discuss the situation and ways of addressing the problems with the work.

There was to be a workshop to discuss the Affordable Workspace work on 1<sup>st</sup> February. Those present were content with the approach taken to date. It was noted that there was a long-standing commitment in the WLA Growth Programme to take forward work on affordable workspace and this work was an important element of this.

The meeting considered a draft brief for a West London Strategic Infrastructure Delivery Plan. This would be considered at the Growth Directors' Meeting on 30 January and presented to the Chief Planners' Group meeting on 24<sup>th</sup> February for final sign-off.

**ACTION** – Any comments on the draft Strategic Infrastructure Delivery Plan brief to be sent to ABP before 24<sup>th</sup> January.

**ALL**

##### b) Economic Prosperity Board/Growth Directors' Board/Chief Planning Officers' Group

Luke Ward (LW) reported on work to refresh the WLA Growth Strategy. It was likely that this would give additional prominence to town centres, digital, the circular economy, Brexit and business rates pooling. It was noted that the Mayor had recently published a Circular Economy Statement setting out how the issue would be looked at for referred planning applications.

LW said that the WLA website was being refreshed, updating the pages dealing with planning (giving easier access to evidence documents) and the West London Orbital.

##### c) West London Orbital

LW said that it was expected that TfL would complete work on the WLO strategic outline business case in the next couple of weeks. In the meantime, London First and the London Chamber of Commerce and Industry had both expressed support for the scheme; both had mentioned this to Heidi Alexander, the Deputy Mayor for Transport.

Assuming approval of the first stage of work by TfL/GLA, work would begin on further developing the business case with a focus on feasibility. As part of this the WLA had prepared briefs for two studies on areas of particular interest/concern to boroughs – one on funding/financing and the other to articulate and evidence the economic development case for the WLO. These would be signed off at the Growth Directors'

#### d) Heathrow Strategic Planning Group

SB reported that work was continuing on masterplanning options. Work on the joint infrastructure study had been completed and it was hoped it would be published shortly. Work was underway on a joint strategic planning framework and there was a good level of agreement; it was hoped this would be ready in time to be submitted to the Development Consent Order inquiry. The Group's new chair would be announced shortly.

#### 5. Borough and Other Authorities' Updates

Hillingdon had received an advice note from the inspector who had carried out the examination of their Part II Plan; they had until the end of January to respond. They would be going out to consultation on proposed main modifications in the spring. As far as neighbourhood planning was concerned, there had been initial interest from the Ickenham Neighbourhood Forum, but nothing had been heard recently.

Barnet were awaiting member approval to move to regulation 18 consultation on their draft local plan, which was expected to take place in the early summer. They had two neighbourhood forums, but progress on neighbourhood plan-making was very slow.

Hammersmith and Fulham were working on supplementary planning documents dealing with Hammersmith town centre and railway arches. There had been no recent neighbourhood planning activity.

Brent had recently completed regulation 18 consultation on their draft local plan. They were currently considering the Mayor's general conformity response which was both extremely detailed and internally inconsistent. On neighbourhood planning, a draft plan for Harlesden was at examination, while the Sudbury Neighbourhood Forum was amending its constitution.

Harrow were continuing work on developing the evidence base for its local plan-making. The Harrow on the Hill Neighbourhood Forum had started work on a neighbourhood plan, but this had proved abortive. LW mentioned the need to recognise the contribution the WLO would make to Harrow; this was being modelled and he would provide the results when they were available.

LW

Ealing had published their local development scheme and would be consulting on initial local plan proposals in the autumn. As far as neighbourhood planning was concerned, plans had been adopted for Central and West Ealing (although in the latter case the Forum's designation had lapsed). A forum representing Greater Central Acton has been formally recognised following competing bids from two groups for overlapping areas. A further application is expected for Acton Hill shortly.

The Old Oak/Park Royal MDC local plan examination was scheduled for April; the programme officer would be liaising with representors shortly regarding draft matters and issues. In the meantime, they were consulting on three SPDs until 22<sup>nd</sup> February, dealing with planning obligations; waste management in high density; and energy, daylight and overheating in high density. It was anticipated these would be adopted after the local plan in autumn 2018.

They would be presenting an updated statement of community involvement to their Planning Committee in February, with a view to adoption by their Board in March.

<p><b>6. Any other business</b></p> <p>It was agreed that the Group would continue to meet four times a year; Thursday mornings were agreed to be convenient.</p> <p><b>ACTION</b> – ABP to circulate a programme of meetings for 2019-20.</p>	<p><b>ABP</b></p>

## West London Alliance

# Planning Policy Officers' Group

meeting notes of 25<sup>th</sup> April 2019 **draft**

**Present:** Steve Barton (chairing, Ealing); Nick Lynch (Barnet); Paul Lewin (Brent); Sam Cuthbert, Ian Weake (Ealing); David Hughes (Harrow); Sally Alderman (Hammersmith and Fulham); Michael Thornton (Heathrow Strategic Planning Group); Julia Johnson (Hillingdon); Pete Farnham (OPDC); Joe Oakden (Transport for London); Luke Ward, Andrew Barry-Pursell (WLA).

**Apologies:** Isabelle Haddow (Hammersmith and Fulham); Alison Bradshaw (TfL)

ITEMS / ACTIONS	LEAD
<b>1. Chair's welcome and previous notes</b> Steve Barton (SB) gave a welcome. The note of the previous meeting (24 <sup>th</sup> January 2019) was approved.	SB/ABP
<b>2. National Planning</b>  It was noted that the <b>updated National Housing Need Methodology and supporting national guidance</b> had been issued since the last meeting.  <b>Letwin Review on build out rates:</b> The Government had announced that it would be issuing additional planning guidance on housing diversification to encourage large sites to support a diverse range of housing needs and help them build out more quickly.  <b>Faster decision-making:</b> It had been announced that later in the year the Government would be publishing an "Accelerated Planning" green paper on ways of ensuring faster decision-making in the planning system. This would "discuss how greater capacity and capability, performance management and procedural improvements can accelerate the end-to-end planning process"; it would also address the recommendations of the Rosewell Review of the planning appeal process.  <b>CIL Regulations:</b> Following discussion at the last meeting the WLA had submitted comments on proposed changes to the Community Infrastructure Levy Regulations. MHCLG were still considering the responses to the proposals.  <b>MHCLG Future High Streets Fund:</b> Several boroughs had submitted bids for the Government's Future High Streets Fund. These had typically been dealt with by economic development rather than planning teams, but it was felt that these would provide a useful idea of borough priorities for town centres that could inform future WLA work.  <b>ACTION</b> – All boroughs to send details of Future High Streets Fund bids to Andrew Barry-Pursell (ABP) who would provide a consolidated list.  <b>Planning Delivery Fund</b> – It was currently uncertain when the call for bids for PDF funding would be published. A West London bid would be made at the appropriate time; the need to act quickly in assembling and approving this was emphasised.	ALL/ABP
<b>3. Regional Planning</b>  <b>a) London Plan Examination in Public: Matters, attendance and emerging issues</b>	

ABP reported back on the WLA participation in the London Plan examination in public sessions on housing requirements; housing targets; small sites and small housing development; and housing size mix. This had shown the value of joint borough working and development of a sub-regional evidence base, which in some sessions had proved superior to that relied on by the Mayor's team. It appeared likely that the Examination Panel would be making recommendations to the Mayor for changes to the draft Plan's housing policies. Given this and the stance being taken by the Secretary of State it seemed unlikely that the policies would go ahead in their current form. The meeting expressed thanks for all those involved in assembling and presenting the WLA's case.

There was discussion around the likely timetable for production of the Panel's report, the Mayor's decisions on its recommendations and the Secretary of State's consideration of the draft – particularly given the Mayoral election in May 2020 and the start of the pre-election purdah period in the preceding March. It seemed likely that whatever happened there would be an early review of the housing (and perhaps also employment land) policies.

ABP said that the WLA were due to participate in the session on Matter M76 (Transport Schemes and Development) to support the West London Orbital, but that he would not be able to attend. Barnet were planning to be present on the day for another Matter, and Nick Lynch offered to ask Paul Bowker, who would be the Barnet representative if he would also cover this session.

**Nick Lynch**

#### **b) Mayor's Homebuilding Capacity Fund**

A table setting out the outcome of West London boroughs' Homebuilding Capacity Fund bids was tabled (attached as annex 1 to this note). It was noted that a number of boroughs had been successful in securing funding for work on small sites; they would be discussing the scope for working jointly. ABP said that if this was not possible, the WLA would like to provide a degree of coordination so that common lessons could be identified and shared and, perhaps, drawn on to inform future work.

**ACTION** – boroughs taking forward work on small sites to continue discussion on joint working and inform ABP of the outcome. A report would be given to the next meeting of the Group.

**Nick Lynch/Paul  
Lewin/SB/David  
Hughes/ABP**

#### **c) Duty to cooperate: waste**

Barnet, Ealing, Harrow, Hillingdon, Hounslow and the OPDC (as well as Richmond-upon-Thames from outside West London) had been approached by Westminster City Council about the scope they might have to manage part of Westminster's draft London Plan waste apportionment. Westminster had written to them on the basis that they had received waste from the City Council between 2013/14-2015/16.

Hillingdon had drafted a suggested common response for the boroughs approached to make:

*"The London Borough of XXXXX currently pools and manages its apportionment requirements with the London Boroughs of XXXXX, XXXXX, XXXXX, XXXXX, XXXXX*



*and the OPDC through the joint West London Waste Plan (2015). The draft London Plan (2017) is currently proposing to revise the apportionment figures allocated to each London Borough. Upon the adoption of the draft London Plan (2017), a review of the West London Waste Plan will be required to evaluate if there is sufficient capacity to manage the collective waste apportionments of the London Boroughs of Brent, Ealing, Harrow, Hillingdon, Hounslow, Richmond and the OPDC. Therefore it is not possible to commit to accepting the waste apportionment of another local authority before this review has been undertaken. Please note that this response has been agreed by the other member of the West London Waste Plan."*

It was agreed that this would be used as the basis for boroughs' response to Westminster. ABP suggested that it would be worth adding that:

- Boroughs considered that this is a strategic matter within the meaning of section 33A of the Planning and Compulsory Purchase Act 2004 and so one subject to the statutory duty to cooperate.
- Boroughs would be willing to continue to engage with Westminster in taking the issue further, in line with the statutory duty.

ALL

#### 4. Sub-regional planning

##### a) Joint Evidence Base: Current work

**Strategic Infrastructure Delivery Plan:** Only one bid had been received for this work, from DLP Planning. ABP said that the approach taken in the bid did not demonstrate clearly that the consultants had understood the difference between a borough infrastructure delivery plan and the kind of strategic approach required here. It was not clear that some of the bid team members had directly relevant experience. Given the importance of the work, he suggested that the bidder be asked to attend an interview at which these issues could be discussed and a decision about the way forward taken. Adam Driscoll (Barnet) had kindly agreed to join him and Sam Cuthbert (SC) to do this.

**Employment Land:** SC reported that after a substantial amount of input from borough representatives it appeared that a report with some useful insights would emerge – particularly regarding the difference between “last mile” and other logistics provision and the fact that much of the logistics requirement in West London would be for business to business activity, which could be provided for outside London.

He reported on a meeting with the GLA London Plan team about the work. Some further work for the consultants had been identified as a result and it had been agreed that the final draft would be passed by the GLA for their comment. He noted that the GLA had indicated that they might be interested in doing some further work on substitution of employment land beyond the London boundary, and that West London might put itself forward to take a lead role. There was general approval for this approach should the GLA proceed.

**Affordable Workspace:** This work was proceeding well. A further draft had been circulated for comment.

## b) Potential future work

There was discussion of potential future areas of work in developing a joint evidence base:

**Affordable housing and small sites:** It was suggested that there would be value in a piece of work looking at the extent to which affordable housing could be secured from small sites, particularly in light of national policy and the approach being taken in the draft London Plan (which encouraged a tariff-based approach). This might look at how to address national and regional policy requirements, viability, evidence of need that could be used to support policies, targets and thresholds, options for tariff approaches, and implementation mechanisms. It would also be helpful to assess registered provider appetite for what might be a larger number of relatively small schemes and at what level of provision a critical mass might be reached at which they would become more interested. There was general support for this work (only Hammersmith and Fulham and OPDC indicated that they were unlikely to be interested).

**ACTION** – ABP and SB to work up a specification for a consultancy commission on small sites and affordable housing for circulation to the Group for comments. They would also explore the scope for funding from PDF money in hand.

**ABP/SB**

**Housing and Employment Land Availability:** Work on employment land, around the draft London Plan EIP and emerging information about the requirements that Heathrow expansion might generate suggested that there would be value in carrying out a West London Housing and Employment Land Availability Assessment to establish the land requirements for housing, employment and other uses and the availability of sites to meet them. This would be a valuable piece of evidence for local plan-making and to demonstrate compliance with the statutory duty to cooperate. It might be an element of a 2019 PDF bid.

There was general support for this, although OPDC and Hammersmith and Fulham reserved their position.

**ACTION** – ABP to circulate a proposal for a West London Housing and Employment Land Availability Assessment.

**Housing delivery:** ABP said that in addition to the Land Availability Assessment he had been considering commissioning a report on barriers to housing delivery in West London from Molior London. This would cover the same general issues that the Mayor's reports on the same subject dealt with, but with a particular focus on distinctive issues facing West London and consideration of the scope for development of small sites on the scale envisaged by the draft London Plan. There was general support for this.

**ABP**

**ACTION** – ABP to circulate a proposal for comment.

**Housing need methodologies:** Given the Secretary of State's clear indication to the Mayor that there should be an early review of the London Plan housing policies with a view to alignment with the National Housing Need Methodology, there would be value in commissioning a review of the national approach and its applicability to London. This would enable West London to take a leading role in future discussion of

these issues. This would effectively be an extension of the West London Strategic Housing Market Assessment.

SC said that Ealing intended to commission ORS to establish housing affordability thresholds on a ward basis across the Borough and suggested that there could be economies of scale in an appointment covering both work areas.

**ACTION** – ABP and SC to look at the scope for a joint commission and to report back to the Group.

**ABP/SC**

**Other potential work areas:** SB asked for suggestions for other areas of evidence base work that could be taken forward either under the current PDF funding or to form the basis of a future bid. An evidence base to support setting of locally-specific greening requirements was suggested.

**ALL**

**ACTION** - any further ideas to be sent to ABP.

### c) Section 106: Training/Skills

ABP suggested that another potential area of work was looking at the scope for work at a sub-regional level on use of the planning system to promote training and employment opportunities, particularly in the construction sector. In particular there might be scope for a coordinated approach to working with employers and providers, providing a clearing house for opportunities that might not be filled locally, drawing up model policies and section 106 agreement clauses, monitoring and promotion. He said that the proposed first step would be a questionnaire to establish current borough practice.

Luke Ward (LW) noted that the West London Skills Board had expressed support for some work of this kind. There was general support for examining the issue further.

**ACTION** – ABP to circulate a proposal for this work, including the topics that might be covered by a questionnaire.

**ABP**

### d) Economic Prosperity Board/Growth Directors' Board/Chief Planning Officers' Group

LW reported on work to refresh the West London Vision for Growth. This would be more ambitious in scope than the current one, with greater emphasis on delivery. A draft would be prepared for discussion with Growth Directors on 22<sup>nd</sup> May and he would be glad to share this with the Group. It would cover:

- Work and productivity
- Infrastructure
- Successful places
- Investment, business growth and fiscal devolution

The final version would be ready for approval in the autumn.

He noted that London Councils had circulated a note about the principles and bidding process for the London Business Rates Strategic Investment Pot (SIP) for 2019/20. This would involve a total of £40 million (£25.7 million from Business Rate

growth pooling and £15.2 million that had not been allocated in 2018/19). The process allowed more time for bid preparation, and funding would be awarded by the end of the year.

He reported on progress in implementing the digital infrastructure work being funded by the successful West London 2018/19 bid. This comprised:

- £1 million per borough to fund installation of digital infrastructure in conjunction with Transport for London using their network and stations as hubs and
- £100,000 for each borough to cover the cost of work to enable installation more widely – by funding highway work, for example.

#### e) West London Orbital

ABP said that it was expected that TfL would sign off work on the WLO strategic outline business case and approve work on the next stage of business case very shortly. Assuming the required approvals, work would begin on further developing the business case with a focus on feasibility including the two studies on areas of particular interest/concern to boroughs – funding/financing and articulating/evidencing the economic development case for the WLO.

#### f) Heathrow Strategic Planning Group

Michael Thornton (MT) gave an overview of the work of the Heathrow Strategic Planning Group, which represented 15 local authorities and local enterprise partnerships affected by the proposed airport extension.

**Development consent order:** Heathrow Airport Limited (HAL) anticipated submitting a DCO application in June/July 2020. The current stage was akin to a pre-application stage, with early advice from local authorities; it was clear from discussions with HAL that their approach would be to phase expansion in line with projected increases in air traffic movement and passenger numbers. The immediate next stage would be a formal public consultation exercise in mid-June.

He noted that there was a rival expansion proposal being promoted by Arora Group to provide terminal capacity and that they would also be making a DCO submission. However, this was not supported by Government and the Planning Inspectorate had raised concerns about the way the proposal was being put forward.

The DCO would focus on the expansion itself and the works it would require on the airport site. It would not deal with displaced activities or the requirements for land use it would generate. These would be likely to be substantial (200,000 sq m of freight forwarding facilities, 380,000 sq m of logistics provision and 125,000 sq m of reprovided or additional manufacturing/industrial space).

**Joint Spatial Planning Framework:** The HSPG was preparing a non-statutory spatial planning framework for the areas most immediately affected by expansion to form the basis of the asks authorities would make of HAL and through the DCO process. These had been divided into three sectors, one of which covered the areas of the boroughs of Ealing, Hillingdon and Hounslow (although it was noted that Hillingdon and the Mayor were not participating in the work of the HSPG because of their stance on expansion). It was intended that there would be stakeholder engagement

in September/October with a view to securing member sign-off and preparation of a statement of common ground for the DCO process by spring 2020. He thought there might be supporting “daughter” documents which might include issues like pooling of resources secured through the planning process.

LW said that other West London boroughs should be involved, particularly Barnet, Brent and Harrow. This was particularly important given the scale of employment land that might have to be found to accommodate activities displaced from the airport site and to service additional demand arising from expansion. There were also major concerns about surface access and freight/servicing.

**Joint Evidence Base:** HSPG had commissioned an evidence base jointly with HAL. This would look at the demand for different land uses generated by the expanded airport. It was currently being updated and consideration was being given to whether and when it might be published.

Julia Johnson (JJ) explained the position being taken by Hillingdon on expansion. She said that judgement in the judicial review proceedings relating to the Airports National Policy Statement would be given in the next few weeks and her authority would consider its position in its light.

**ACTION** – ABP to circulate HSPG papers to members of the Group so they can comment and participate in HSPG work, particularly that of its Strategic Planning Sub-Group.

**ABP**

## 5. Borough and Other Authorities’ Updates

Hillingdon would be consulting on major modifications to their Part II Plan in May; they then anticipated receiving the Inspector’s final report in June/July. They would be participating in future draft London Plan EiP sessions on minerals, parking and aviation.

Barnet had paused work on regulation 18 consultation on their draft local plan in light of the outcome of the National Housing Need Methodology and Delivery Test. They were revising policies with the higher housing target in mind, with a view to going out to consultation at the end of the year. They were working on supplementary planning documents for Edgware (jointly with Harrow) and the Middlesex University site. A draft neighbourhood plan for West Finchley had been submitted to them.

Brent intended to publish their draft local plan towards the end of the year. They were considering Article 4 directions on houses in multiple occupation and to lift office/industrial to residential permitted development rights borough-wide. The referendum for the Harlesden Neighbourhood Plan would take place on 30<sup>th</sup> May.

Harrow were continuing work on developing the evidence base for its local plan-making.

Ealing intended to consult on initial local plan proposals in the autumn. In the meantime, it was continuing to develop its local plan evidence base. Consultation on a draft Acton Hill neighbourhood plan would start shortly.

The Old Oak/Park Royal MDC local plan examination was now adjourned; it was felt to have gone reasonably well. Car Giant - the largest single landowner in the area)

had decided it no longer wanted to develop its site and the last hearing session, in June, would involve them. They expected to consult on major modifications in June/July with the final Inspector's report shortly thereafter and formal adoption in the autumn. In the meantime, they were continuing work on supplementary planning documents on topics including public realm and infrastructure.

**6. Any other business**

The next meeting would be on Thursday 25<sup>th</sup> July at 10 am in Room 5.17 at Perceval House.

## ANNEX

### WEST LONDON ALLIANCE

#### MAYOR'S HOMEBUILDING FUND: WEST LONDON BOROUGH'S BIDS

##### ***Barnet***

Barnet was awarded a total of £305,000:

	LBB Bid	HCF Award	Notes
Edgware SPD	£250,000	£175,000	Bid (of £250k) included £25k to LB Harrow.
A5 Height Strategy	£30,000	£30,000	Project to be match-funded by LB Brent (£30k).
Small Sites Programme	£212,500	£100,000	Project to be match-funded by LB Brent (£420k).
De-risking Council Delivery to Treble Supply	£144,000	0	Project to be match-funded by LB Brent (£144k).
De-risking mixed tenure to boost Council housing	£180,000	0	Project to be match-funded by LB Brent (£275k)

##### ***Brent***

Brent was awarded £628,000:

	HCF Award
Neasden Growth Area Masterplanning	£198,000
New council housing delivery (mostly small sites) – 817 homes	£430,000

##### ***Ealing***

Ealing was awarded £547,000:

	HCF Award	Notes
Characterisation and Design Guide	£70,000	
Increase pipeline of council-owned land	£261,000	
Northolt Masterplan	£110,000	
Older Adult Accommodation Strategic Brief	£106,381	

### ***Harrow***

Harrow was awarded £525,000:

	HCF Award	Notes
Small site capacity study	£90,000	Includes analysis of historic refusals on small sites
Characterisation study	£75,000	Including areas appropriate for tall buildings
Design code (including training)	£95,000	Linked to small site capacity study and characterisation study
Developing expertise and upskilling	£140,000	Specialist technical and officer support within Housing, Planning and other service areas, mentoring and training.
Housing – additional housing capacity / site assessments	£100,000	Includes feasibility studies (technical / financial) of upwards extensions on Council flats).
Edgware SPD	£25,000	Work being led by LB Barnet

### ***Hillingdon***

Hillingdon was not awarded any HCF funding for the two bids they submitted (for an intensification of industrial land study and project manager for the council housebuilding programme).

### ***Hounslow***

Hounslow was awarded £500,000:

Project	HCF Award	Notes
<b>Estate Renewal</b>	£170,000	<ul style="list-style-type: none"> <li>- Review of stock holdings to provide an evidence base for a development pipeline of HRA sites</li> <li>- Architects to take forward priority sites</li> </ul>
<b>Housing</b>	£130k	<ul style="list-style-type: none"> <li>- Taking forward opportunity sites, including industrial areas,</li> </ul>



<b>Development Potential</b>		<p>and town centres, focusing on site amalgamation, land acquisition &amp; assembly</p> <ul style="list-style-type: none"> <li>- Internal training programme</li> </ul>
<b>Housing Intensification Tool</b>	£200k	<ul style="list-style-type: none"> <li>- Borough character study – refresh and digitalised with new design codes</li> <li>- creating a 3D model in a viewing programme for the area</li> <li>- Internal training programme</li> </ul>

## West London Alliance

# Planning Policy Officers' Group

## meeting notes of 25<sup>th</sup> July 2019

**Present:** David Hughes (chairing, Harrow); Ken Bean (Barnet); Paul Lewin (Brent); Ian Weake (Ealing); Michael Thornton (Heathrow Strategic Planning Group); Julia Johnson (Hillingdon); Pete Farnham (OPDC); Joe Oakden (Transport for London); Andrew Barry-Purssell (WLA).

**Apologies:** Steve Barton (Ealing); Nick Lynch (Barnet); Alison Bradshaw (TfL); Luke Ward (WLA)

ITEMS / ACTIONS	LEAD
<p><b>1. Chair's welcome and previous notes</b></p> <p>David Hughes (DH) gave a welcome. The note of the previous meeting (25<sup>th</sup> April 2019) was approved.</p> <p>As a matter arising it was noted that none of the West London bids for the Future High Streets Fund had been successful; three London centres had been shortlisted – Old Kent Road, Sutton and Tottenham High Road.</p>	
<p><b>2. National Planning</b></p> <p><b>MHCLG ministerial team:</b> It was noted that the new Secretary of State at the Ministry for Housing, Communities and Local Government (MHCLG) was Robert Jenrick. Esther McVey had been appointed Minister of State, although it was not clear what her ministerial responsibilities would be.</p> <p><i>Post meeting note: Kit Malthouse was Minister of State for Housing at the time of the meeting; he has since been moved to the Home Office. Esther McVey's responsibilities have yet to be published on the MHCLG website.</i></p> <p><b>National Planning Practice Guidance:</b> It was noted that MHCLG had recently published new and updated NPPG covering areas including effective use of land, green belt, housing supply and delivery, housing needs of different groups and housing and economic needs assessment.</p> <p>DH noted that the Department for the Environment, Food and Rural Affairs had recently published the Government's response to its consultation on delivering a biodiversity net gain from new developments (<a href="https://www.gov.uk/government/consultations/biodiversity-net-gain-updating-planning-requirements">https://www.gov.uk/government/consultations/biodiversity-net-gain-updating-planning-requirements</a>). This stated the Government's intention to set a requirement for 10% biodiversity gain and to require local planning authorities to publish local diversity programmes, which would have resource implications for planning departments.</p> <p><b>Segregation of affordable housing residents:</b> MHCLG had announced its intention to "help end the segregation of social housing residents in mixed-tenure developments" through changes to planning guidance and a new design manual.</p> <p><b>Creating space for beauty:</b> MHCLG had published the interim report of the Building Better, Building Beautiful Commission.</p> <p><b>Planning Delivery Fund</b> – It was still uncertain when the call for bids for PDF funding would be published.</p>	

### 3. Regional Planning

#### a) London Plan Examination in Public: Matters, attendance and emerging issues

The Examination Panel was preparing its report, which they anticipated releasing in September. In the meantime, the Mayor had issued a version of the draft London Plan consolidated with changes proposed before and during the examination.

These included provision for a stepped approach to meeting housing targets. At the same time the Government's changes to NPPG had tightened the five-year housing land supply requirements. It was clear that some of the supply identified through the London Strategic Housing Land Assessment could not be counted for the national requirement. This was an issue that was already arising in appeals.

It was noted that:

- policy seeking to prevent boroughs from setting home size requirements for market policy had been amended to allow policies of this kind for allocated strategic sites, but was otherwise unchanged.
- the small sites policy had now been broken down into two policies, which were somewhat more comprehensible.
- The fast-track policy on viability had been changed to allow single tenure approaches to affordable housing provision on small sites.
- Housing targets for opportunity areas were now stated as being indicative, rather than minima.
- There had been changes to the language dealing with strategic issues and policies crossing the Greater London boundary, with greater emphasis on engagement and a hook for joint strategic planning – although not explicit support.

#### b) Mayor's Homebuilding Capacity Fund

There was a discussion of progress in projects funded by the Mayor's Homebuilding Capacity Fund.

Harrow had had discussions with Ealing about work on small sites and design codes. They were preparing consultancy briefs for work on small sites, characterisation (including tall buildings) and a small sites design code. Barnet had started work jointly with Harrow on preparation of an Edgware supplementary planning document and with Brent for one for the A5 corridor. Brent was preparing to start work on a Neasden masterplan. Ealing was about to go out to tender for work on a characterisation study/design guidance; they hoped to appoint one consultant to do both pieces of work. They were also developing briefs for a Northolt capacity study and an older peoples' housing study.

**ACTION** – Progress of Homebuilding Capacity Fund-supported work to be a standing agenda item for future meetings of the Group.

ABP

#### c) Duty to cooperate: waste

A number of boroughs had received an email approach from LB Lambeth about cross-boundary movement of waste in connection with their statutory duty to cooperate. This stated that a strategic amount of Lambeth's waste has been managed in West London at two sites in Hillingdon; as a result, they were seeking a statement of common ground documenting the cross-boundary waste matters being addressed and

progress being made. They had sent a separate letter to the Old Oak/Park Royal Development Corporation about waste exports to Willesden Freight Terminal. They had provided a draft statement of common ground.

Julia Johnson (JJ) said that Hillingdon had noted that the restoration of one of the sites mentioned (Sipson North East Inert Landfill) had been using landfill waste as part of its restoration, which was now complete. The other (Holloway Lane Materials Recycling Facility) did not appear to have received any waste from Lambeth since 2014. Accordingly, Hillingdon proposed to suggest that both sides should investigate the current position before agreeing that there were no known reasons why the facility could not handle waste at the 2013 level.

**ACTION:** Boroughs approached would make separate responses to Lambeth's request, based on Hillingdon's approach. Hillingdon would liaise with LB Richmond upon Thames as they are members of the West London Waste Authority.

JJ/ALL

#### 4. Sub-regional planning

##### a) Joint Evidence Base: Current work

**Employment Land:** Ian Weake reported that the final Employment Land Assessment Report would be available by the end of the month. It was felt that this would provide robust evidence that would help boroughs with local plan preparation. The GLA had been asked for comments on the draft report; their response was largely criticism for not using the same approach as they had in preparing the evidence base for the draft London Plan. The matter would now have to be resolved through borough local plan examinations. He said he would check on arrangements for disseminating the final report and let those concerned know when they would receive it.

**Affordable Workspace:** There had been some concern about whether the consultants' work was meeting the project specification and, in particular, about the approach they were taking to viability issues. Discussions with them had identified areas for further work. It had been agreed that they would provide a full draft report for consideration and a further report would be made to the next meeting.

**Strategic Infrastructure Delivery Plan:** This work was now out for retender, with a new specification and an £80,000 contract value. The deadline for return of proposals was 18<sup>th</sup> August.

**Affordable housing and small sites:** Following the discussion about the value of work looking at the extent to which affordable housing could be secured from small sites, a draft specification for a West London Small Sites Affordable Housing Delivery Study (SSAHDS) had been prepared for discussion. ABP noted that this looked like being a fairly substantial (and so costly) piece of work and would probably have to await further Planning Delivery Grant funding.

DH suggested that it would be worth testing a range of viability scenarios for each borough based on local values and conditions to give any report spatial granularity.

**ACTION** – Any further comments on the draft SSADS specification should be sent to ABP by September 6th.

IW

ALL

**Barriers to housing delivery:** ABP presented a proposal for a report on barriers to housing delivery in West London from Molior London, an idea that had been discussed at the previous meeting. This would cover the same general issues that the Mayor's reports on the same subject dealt with, but with a particular focus on distinctive issues facing West London and consideration of the scope for development of small sites on the scale envisaged by the draft London Plan. He said that he would revisit the specification in light of the NPPG changes (particularly those on housing demand and supply) and would circulate a final proposal for comments. This should be a relatively small commission for which there was some Planning Delivery Grant money available.

It was agreed that this would be a valuable piece of work, particularly for boroughs required to prepare housing delivery test action plans.

**ACTION** – ABP to circulate a revised proposal for comment.

**ABP**

**Housing and Employment Land Availability:** ABP presented a paper outlining a proposal for a West London Housing and Employment Land Availability Assessment to establish the land requirements for housing, employment and other uses and the availability of sites to meet them. It had been presented to the Chief Planners' Group, who had endorsed the approach. This would be another substantial piece of work which would have to await further funding.

There was general support for the proposal. It was suggested that the assessment could address not only capacity but also assumptions about the phasing of development against historic delivery rates to help boroughs make more informed decisions about when sites might come forward on a basis more accurate than the London Strategic Housing Land Availability Assessment.

**Section 106: training and skills:** ABP reported that following discussions at the West London Employment and Skills Board and the Chief Planners' Group about ways of making better use of planning obligations to secure employment and training opportunities across borough boundaries, a questionnaire had been sent to local planning authorities asking about current practice and views about the potential of sub-regional coordination, engagement and policy formation. Responses had been asked for by 16<sup>th</sup> August.

#### **b) Economic Prosperity Board/Growth Directors' Board/Chief Planning Officers' Group**

ABP said that work was under way on West London bids for funding from the Strategic Investment Pot of retained business rate revenue. There would be three elements – support for work to develop the West London Orbital rail project and proposals taking forward the current SIP-funded programmes on skills and digital infrastructure. The WLO bid would include match-funding for the costs of working the project up to the stage at which a Transport and Works Act Order application could be made, some funding for public consultation and engagement and an element for borough masterplanning/transport planning for places served by the WLO, either directly or by interchange.

He also reported on the progress of work to refresh the West London Vision for Growth and agreed to circulate an Economic Prosperity Board report setting out the current position. Once a draft had been prepared it would be circulated to the group.

**ACTION:** ABP to circulate EPB paper

**ABP**

### c) West London Orbital

#### *Progress report*

ABP said that the second phase of work to develop the WLO business case was now under way. This would focus on technical feasibility, with TfL/Network Rail leading studies on:

- Operational aspects, including maintenance and rolling stock
- level crossings along the route (including Bollo Lane and Acton Central)
- traction power options to identify the amount of power required for the operation of the proposed line
- timetabling options to test the capacity of existing and new infrastructure to carry the additional traffic proposed.
- line of route infrastructure, examining engineering feasibility of the improvements that will be required at Acton Wells Junction and signalling upgrades along the route.

The WLA would lead two studies. The first would set out and quantify the wider economic benefits that the WLO might support. The second would consider options for funding and financing, given Transport for London's financial position and the likely reliance on land value capture and planning gain. It was likely that appointed consultants for both studies would engage with members of the Group.

There would be a seminar for local planning authorities to kick off the second stage of WLO business plan work on 17<sup>th</sup> September; further information would be circulated shortly.

#### *Safeguarding*

ABP presented a paper suggesting an approach to early strategic safeguarding of the WLO route and station sites, building on the work many boroughs have already done to include the WLO and protection of its route in local plan policies. It was proposed that local planning authorities inform the WLA of any application for:

- a) A major development within 1 km of the WLO route and any proposed WLO station. "Major development" in this case is as defined in the National Planning Policy Framework (10 or more homes or the site is 0.5 hectares or more; additional non-residential floorspace of 1000 sq. m or more or a site of 1 hectare or more); or
- b) Any other development within 1 km of the WLO route that in the opinion of the LPA might have a material effect on implementation of the WLO.

Notification could take the form of a simple email with an address, description of development and application reference number. This would enable the West London Alliance to keep an overview of development along the route and make representation where appropriate to help maintain the viability of the project. The WLA would provide support/evidence to support refusals at appeals where requested. The fact that development along the route is being monitored could be mentioned at pre-application meetings with developers. The WLA would be looking to prepare some publicity material about the project that could be used at planning receptions etc.

It was agreed that the proposed approach was reasonable and that members of the Group would draw it to the attention of their development management colleagues. DH asked

whether it was possible to provide a GIS layer with the route and a 1 km buffer; ABP agreed to explore this with TfL. He also said he would write more formally to West London local planning authorities involved asking for their assistance in implementing the proposed approach.

ALL

**ACTION:** ABP to explore availability of a WLO route GIS layer and to write to relevant LPAs asking for their assistance with WLO safeguarding.

#### d) Heathrow Strategic Planning Group

Michael Thornton (MT) reported on the work of the Heathrow Strategic Planning Group (HSPG).

**Statutory consultation:** Heathrow Airport Limited (HAL) were conducting a round of statutory public consultation on their preferred masterplan proposals prior to submission of a development consent order application. The deadline for comments was 13<sup>th</sup> September. He said that the HSPG was considering its response, but that the consultation had not raised anything unexpected. HAL were taking a cautious approach, looking to minimise the amount of floorspace that would be included in their DCO and to finding space for displaced and additional uses in the wider sub-region. Alongside consultation on the masterplan, they were also consulting on changes to airspace management to enable them to expand capacity before the new runway was in service. HSPG was also reviewing HAL's Preliminary Environmental Information Report, which they considered did not deal adequately with issues like noise mitigation.

ABP

In discussion it was noted that Ealing, Hillingdon and Hounslow would be responding to the consultation. Harrow supported expansion and would focus comments on the airspace changes and noise issues. Brent would be commenting particularly on transportation issues. OPDC would not be commenting separately but would be associated with the detailed response being prepared by the Mayor/TfL.

**Joint Spatial Planning Framework:** MT reported that Arup had been commissioned to look at ways of stepping up the ambition of the non-statutory Joint Spatial Planning Framework it was preparing for the areas most immediately affected by expansion, in particular so it was not just about the response to expansion, but also about meeting the challenges facing the area and making the most of the opportunities HAL's proposals presented (for delivering infrastructure priorities, for example). The JSPF was particularly important given the indication in HAL's masterplan of the extent to which it relied on land outside the DCO red line. A draft was being prepared and there would be further wider engagement in the autumn. The JSPF was being accompanied by an Economic Development Vision and Action Plan, which was also being worked up by Arup.

JJ said that Hillingdon and the other parties to the judicial review of the Airport National Policy Statement had been given leave to appeal from the High Court's decision on some of the grounds of challenge. The hearing in the Court of Appeal would take place in October.

MT noted that the HSPG website had been refreshed and updated.



## 5. Borough and Other Authorities' Updates

The nineteenth and final session of the Old Oak/Park Royal MDC local plan examination had been held the previous week. This dealt with the site controlled by Car Giant, who were still saying they no longer wanted to develop it but had indicated that they would withdraw their objections to the local plan if three issues of concern to them were addressed. Work to do this was under way, but it meant that adoption was likely to be delayed until March 2020. In the meantime, they were continuing work on supplementary planning documents on topics including public realm, post-occupation monitoring and Park Royal.

Ealing had decided to slip consultation on initial local plan proposals. This would enable internal corporate consultation in the autumn and public consultation in spring 2020. A new neighbourhood forum had been established in Central Acton, which had appointed consultants to help prepare an evidence base to support neighbourhood plan preparation. They were also likely to review their Community Infrastructure Levy rates alongside their local plan.

The public examination of Hillingdon's Part II Plan was still underway. They were expecting the Inspector's final report in September with a view to adoption in November. In the meantime, they would be working on development potential in Hayes, looking at infrastructure, potential development capacity and the potential impacts of Heathrow expansion and development at Southall on the local highway network. They were also considering a supplementary planning document on consolidation of some of their town centres.

Hounslow would be going out to regulation 19 consultation in the next week. They were finalising their statement of common ground to support this.

Brent intended to publish their draft local plan on 24<sup>th</sup> October. They were reviewing article 4 directions for employment (extending the lifting of office/industrial to residential permitted development rights beyond industrial and growth areas) and introducing one to protect houses in multiple occupation (to protect family housing in light of changing London Plan policy on home size). The referendum for the Harlesden Neighbourhood Plan held on 30<sup>th</sup> May had had a positive result and the Plan had now been formally made.

Barnet had now moved to their new offices in Colindale. They also had a new Council Leader and Cabinet planning lead member, and as a result would not now be going out for regulation 18 consultation until early 2020. There was particular member concern about housing targets and the potential outcome of the draft London Plan examination in public. In the meantime, the Mill Hill Neighbourhood Forum had failed to meet the statutory conditions for re-designation. They were considering reviewing their CIL rates, considering viability evidence; this review was likely to be taken forward in conjunction with the local plan review.

Harrow intended to publish their issues and options consultation in early 2020. They had no active neighbourhood forums.

## 6. Any other business

### *Self-build housing*

IW asked about the approach authorities were taking to custom and self-build housing as the end of the first "base period" approached. Brent were relying on small sites, but demand was



low-level. Barnet's position was similar. Harrow had a paper for Cabinet discussion proposing local criteria for eligibility to be entered on the self-build register and would be filtering their list in their light and moving to an in-house register. There had been a medium level of interest (exaggerated by use of a national register) and no specific sites had been allocated.

The next meeting would be on Thursday 24<sup>th</sup> October at 10 am in Room 4.12 at Perceval House.

## West London Alliance

### Planning Policy Officers' Group

#### meeting notes of 24<sup>th</sup> October 2019 **draft**

**Present:** David Hughes (chairing, Harrow); Claire Bradley (Brent); Michael Thornton (Heathrow Strategic Planning Group); Shay Kelleher (Hammersmith and Fulham); Tom Campbell (Hillingdon); Lauren Lavinieri (OPDC); Gajani Kumar (Transport for London); Andrew Barry-Purssell, Luke Ward (WLA).

**Apologies:** Steve Barton, Sam Cuthbert (Ealing); Nick Lynch (Barnet); Peter Farnham (OPDC); Alison Bradshaw (TfL)

ITEMS / ACTIONS	LEAD
<p><b>1. Chair's welcome and previous notes</b></p> <p>David Hughes (DH) welcomed members of the Group. The note of the previous meeting (25<sup>th</sup> July 2019) was approved.</p> <p>As a matter arising, Tom Campbell (TC) reported that Lambeth had come back to Hillingdon following their waste duty to cooperate request discussed at the last meeting. They had indicated that they had not heard from other West London boroughs and Hillingdon were now dealing with the matter separately. Lauren Lavinieri (LL) said that the OPDC had received a letter from Lambeth on a similar point and were dealing with the matter direct.</p> <p>Andrew Barry-Purssell (ABP) said that the West London Employment Land Assessment had been circulated to the boroughs involved and published on the WLA website (<a href="https://wla.london/media/1068/west-london-evidence-final-report-31072019.pdf">https://wla.london/media/1068/west-london-evidence-final-report-31072019.pdf</a>).</p> <p>He added that there had been no indication of whether or when there would be a further round of Planning Delivery Fund funding.</p>	
<p><b>2. National Planning</b></p> <p><b>Review of permitted development:</b> A team from the Bartlett School of Planning led by Dr Ben Clifford had been appointed by the Ministry of Housing, Communities and Local Government to conduct research on the quality of housing delivered through permitted development, and how they compare to homes delivered after approval through a full planning application. It would consider 11 case study authorities across England, and consider homes created from former offices, light industrial and retail units. Dr Clifford would be attending an Association of London Borough Planning Officers in January. It was thought that the issue of windowless units which had been highlighted by a case in Watford would be addressed by adjustments to permitted development rights.</p> <p><b>Housing Delivery Test:</b> Government had indicated that the Housing Delivery Test results would be published in November.</p> <p><i>Post meeting note: This now seems unlikely!</i></p> <p><b>Queen's Speech:</b> It was noted that the Environment Bill had been reintroduced following the Queen's Speech.</p> <p><i>Post meeting note: Although the Bill received its second reading in the House of Commons on 28<sup>th</sup> October it made no further progress before Parliament was dissolved and it will therefore</i></p>	

*make no further progress.*

### **3. Regional Planning**

#### **a) Report of the Examination in Public of the Draft London Plan**

The meeting considered a paper dealing with some of the key recommendations of the Panel that had conducted the examination in public of the draft London Plan, which had been published by the Mayor on 21 October. The report concluded that the dLP provides an appropriate basis for the strategic planning of Greater London provided it is modified to reflect the changes the Mayor proposed during the consultation and examination processes and a number of changes recommended by the Panel.

Of these, the most fundamental related to housing targets. Although the Panel accepted the London Strategic Housing Market Assessment housing need figure of 660,000 2019-29, it recommended a 19.5% reduction in overall housing targets – from 64,935 pa to 52,285 pa. In West London the reduction is from 156,310 in the draft London Plan to 121,220 – a reduction of 35,090 (22%). The main reason for this reduction was the Panel’s comprehensive rejection of the Mayor’s proposed approach to small sites. For West London as a whole the small sites targets would reduce by 58%, from 60,090 pa in the dLP to 25,000.

The Panel had also concluded that the Mayor’s proposal to restrict boroughs’ ability to set home size requirements in local plan policy could undermine their ability to respond to local need – particularly provision of larger dwellings suitable for families. It accepted the point made by West London boroughs that any local plan requirements proposed would have to be based on robust evidence and subject to examination and recommended that the policy should be dropped.

On employment land, the Panel had concluded that the approach to meeting London’s need for industrial development in the draft Plan’s policies might not be realistic for a number of reasons “relating to the practicalities and viability of significant intensification of Strategic Industrial Locations and Locally Significant Industrial Sites, the continuing pressure to develop non-designated sites for other uses and the likely need for new sites...”. It recommended that in finalising the dLP “further consideration should be given to the management of industrial floorspace capacity categorisations..in order to provide a more positive strategic framework for the provision of industrial capacity”. It went on to say:

“We are unable to provide greater specificity about which particular boroughs’ categorisations may need to be changed, due to the relationship with the SHLAA and housing targets and because of the apparent lack of non-Green Belt options for significant new locations for industrial development”.

The reduced housing targets meant that there would be likely to be a shortfall between planned provision and identified need of 126,500 2019-29. As noted, there were also further pressures on land to meet the requirement for employment land. The Panel had supported the Mayor’s objective of meeting the vast majority of London’s development needs within London, but having rejected the proposed approach to small sites it recommended that the Mayor should lead a strategic review of the Green Belt in London to assess whether it would be reasonable to release land there for development, particularly to close the gap between housing need and address medium to longer term industrial land requirements “especially given the difficulty of accommodating growth in the wider South East”. This review should be led by the Mayor and “should involve joint working with authorities around the administrative boundary as well as the [London] boroughs”. It should be done in the course of “ongoing plan preparation” and should precede any review of the adopted Plan.

It was noted in discussion that a number of districts around London were already not meeting their identified housing needs. The Mayor had not engaged with these districts about this or the scope for their accommodating any of London's unmet need for either housing or employment uses.

Consideration was given to whether the WLA might have a role in encouraging discussions with authorities across the London boundary. It was felt that this might cause confusion with boroughs' own work to discharge the statutory duty to cooperate. It would be worth looking at work on cross-boundary growth corridors, including the London-Stanstead-Cambridge one to see what was being done.

It was also felt that there was little to be gained at this stage by making representations about the Panel's report to either the Mayor or the Secretary of State.

Harrow had received a letter from one of their local amenity societies passing on representations being made by the London Forum of Amenity and Civic Societies relating to the small sites policies in the draft London Plan. The letter reiterated the London Forum's reservations about the policies and sought support for its position that if they were to be taken forward, implementation should be delayed for a year to enable boroughs to get local plans and design codes in place and the Mayor to prepare supplementary guidance. It was agreed that given the Panel's recommendations there was little point in responding to any approaches of this kind at this stage.

Local planning authorities now faced considerable uncertainty about the housing delivery targets they should be including in local plans, particularly as the five year period allowed under the national housing delivery test for boroughs without an up-to-date local plan before they had to default to the national need figure would be running out.

**ACTION** - ABP agreed to give some thought to the issue and produce a short note on the subject.

**ABP**

It was agreed that until the position was clearer about how the draft London Plan would be taken further, there was little point pursuing the proposals for a strategic housing and employment land assessment discussed at the previous meeting.

TC said his authority had started thinking through a number of implementation issues arising from the Panel's recommendations on areas like assessing fire statements and design panels. He said he would circulate details; it was agreed to consider what scope there was for collective West London approaches to these issues.

## **b) Mayor's Homebuilding Capacity Fund**

There was a discussion of progress in projects funded by the Mayor's Homebuilding Capacity Fund.

Harrow had prepared briefs for work on small sites and was about to start the procurement process. Brent had now appointed an officer to prepare a masterplan for the Neasden Growth Area. Hammersmith and Fulham were looking to commission consultants in November. Some examples of briefs welcomed.

#### 4. Sub-regional planning

##### a) Joint Evidence Base: Current work

**Affordable Workspace:** ABP reported that there were concerns about progress of this study. The consultants' work to date had not addressed the requirements of the project brief and they had failed to address comments raised at earlier stages. A revised draft report was awaited; once this was received there would be a need to decide what steps should then be taken to ensure a study of sufficient quality for boroughs to use as part of their local plan evidence base and for the West London Alliance to publish.

Claire Bradley (CB) noted that the consultants had not addressed the issue of most interest to her authority about what was "affordable" in each borough and how this might be ascertained. The work had been required to support Brent's local plan revision, but it was now too late for this purpose. Shay Kelleher (SK) said that Hammersmith and Fulham wanted to consult on a supplementary planning document on the subject soon and that they are considering commissioning other consultants similar perhaps to what Peter Brett Associates had done for Tower Hamlets with the view to prepare a viability assessment to inform it. This work appears so far to have not addressed the issue of how much small and medium enterprises could afford to pay for workspace – will await new draft.

**Strategic Infrastructure Delivery Plan:** ABP reported that following retendering of the project, the contract for preparation of a West London Strategic Infrastructure delivery Plan had been awarded to Atkins. A steering group with representatives from all West London boroughs and the Old Oak/Park Royal Development Corporation had been established and an inception meeting would be held with the consultants on 30<sup>th</sup> October. A workshop with relevant borough representatives would be held at an early stage of the work.

**Affordable housing and small sites:** ABP noted that following the Group's discussions about a draft specification for work on the extent to which affordable housing could be secured from small sites at the last meeting, he had received a number of comments on the draft and he would be revising it taking these on board. As this looked like being a fairly substantial (and so costly) piece of work, it would probably have to await further Planning Delivery funding. It would also be worth seeing what approach was taken to the draft London Plan small sites policies before finalising the brief.

##### b) Section 106: training and skills

ABP reported on the findings of the survey about ways of making better use of planning obligations to secure employment and training opportunities across borough boundaries. The questionnaire had been sent to local planning authorities asking about current practice and views about the potential of sub-regional coordination, engagement and policy formation. Responses had been asked for by 16<sup>th</sup> August. All eight West London local planning authorities (LPAs) had responded and he fed back the findings (the slides presented on these are attached).

The response showed that all West London LPAs used the planning system to secure training/skills opportunities. Some also sought financial contributions in addition or in lieu. There was a variety of policy approaches, including in defining developments from which opportunities/contributions should be sought and in working out how much of each should be provided. There were also variations in the documentation sought from developers. There was

little cross-boundary sharing of opportunities; what there was was informal. Most LPAs worked with training providers, often with the same colleges – but also with a range of local and specialist providers. The questionnaire had asked for views on options for joint working at sub-regional scale across three areas:

- Coordination and engagement: There was unanimous support for a West London officer group for those working on these issues; all but one LPA had also supported a forum bringing together LPA officers, employers and providers. All but one supported coordination of work with colleges and other providers.
- Implementation and monitoring: There was unanimous support for sub-regional matching of opportunities and candidates across LPA boundaries, although a difference of opinion about how this should operate (whether all opportunities should be shared, whether they should be shared if they are not filled locally after a specified period, or whether LPAs should be able to choose between these options. There was mixed support for pan-West London monitoring arrangements. All but one supported a sub-regional campaign promoting construction and property professions as a career choice.
- Policy and technical: there was broad support for development of a pan-West London evidence base to support local plan policy-making, model local plan policies and section 106 clauses. There was also broad support for the principle of a West London-wide supplementary planning document. There was mixed support for pooling of financial contributions across LPAs.

A similar presentation had been made to the Chief Planners' Group earlier in the week. It would also be given to the Employment and Skills Board and the West London Heads of Employment and Skills.

It was agreed that the potential for sub-regional working should be examined further. It was suggested that this might best be done by a small "task and finish" group comprising representatives from the Chief Planners'/Planning Policy Officers' groups and from the Heads of Employment and Skills that would look at the findings of the survey in more detail and recommend those ideas for joint work that had the broadest support. This group could report back in early 2020. Sarah Scannell (SS) had agreed to join such a group at the Chief Planners' Group, and it was agreed that anyone from the Planning Policy Officers' Group willing to volunteer would notify ABP.

**ACTION-** It was agreed to support the establishment of a task and finish group to look at options for sub-regional coordination of planning-based employment and skills provision. Anyone interested in taking part in this group would notify ABP

**ALL/ABP**

### **c) Stations and rail services in local plans**

Gajani Kumar (GK) from Transport for London spoke about the work being done by TfL on the West London Orbital and the information they would require for this from boroughs. They were working with Network Rail on a timetable review to assess capacity for the projected service level and needs for infrastructure improvement. Work was also being done on level crossings along the route and whether these would have to be closed (and where this was required, what impact there would be on traffic). Work on the capacity of existing stations was also underway. They were already engaging with LB Hounslow about the land required for the proposed Lionel Road station and with Barnet about Cricklewood. They were also aware of the work being done by Brent in masterplanning for the Neasden area.

TfL were interested in any other borough planning work that might affect stations or places that would be indirectly served by the WLO through interchange. She was happy to be the point of contact.

GK would be approaching boroughs to obtain the information TfL would need for their work; they would be likely to require information for the period to 2026 (and beyond, if possible). She agreed to provide a template setting out the information that would be required. ABP said he was happy to coordinate the exchange of information.

On stations more widely, GK said it would be helpful to let TfL know about proposals likely to affect them in draft local plans and proposed design guidance.

**ACTION** – TfL to produce a template setting out the information they required.

**ACTION** – WLA to send GK a list of borough WLO contacts

#### **d) West London Orbital**

##### *Stage 2 work: Economic Benefits/Funding*

ABP reported that the second stage of work to refine the business case for the WLO, focussing particularly on feasibility issues, was now underway. There had been a useful seminar for borough planning and transport staff organised jointly with Transport for London on 17<sup>th</sup> September.

Work on two areas was being led and funded by the WLA. The first was to develop an economic development narrative for the WLO, explaining and - as far as possible quantifying - the housing and other economic development benefits of the WLO. This work had been awarded to Steer Group. The second was to examine options for funding the capital and operational costs of the WLO, including identifying practical steps that would have to be taken by boroughs and others and areas for lobbying regional and national government. This work had been awarded to Grant Thornton, working with Mott MacDonald. These studies were being mobilised and for both one of the first steps would be the holding of workshops that would capture borough/other stakeholder views and start the process of information gathering for the studies.

The Group would be kept informed of progress.

##### *SIP bid outcome*

ABP reported that the Panel responsible for allocating Strategic Investment Pool funding had provisionally allocated £3.6 million to support the costs of developing the West London Orbital and funding borough masterplanning and other work on areas that would be served by the WLO either directly or by interchange. This was subject to formal approval by the London boroughs.

The £960,000 for borough WLO-related planning work would be allocated through a formula that would take account of the number of WLO stations in each LPA area, the extent of housing and employment growth projected and the potential business rate growth. All West London LPAs would receive at least £50,000. It was likely that the process for transferring the funds would require a memorandum of understanding and that there would be a light-touch monitoring arrangement. This Group and the Planning Policy Officers would be used as fora to enable sharing of progress and good practice.



## *Safeguarding*

ABP reported that the approach to early strategic safeguarding of the WLO route and station sites agreed at the last meeting of the Group had been signed off by the Chief Planners' Group earlier in the week and would be put into effect from 1 December for an initial six month period.

### **e) Heathrow Strategic Planning Group**

Michael Thornton (MT) reported on the work of the Heathrow Strategic Planning Group (HSPG).

**Statutory consultation:** The statutory consultation by Heathrow Airport Limited (HAL) on their preferred masterplan proposals ended on 13<sup>th</sup> September. He said that the HSPG response had sought further information, and they were now engaging with HAL to obtain that. It was likely that the scheme would be "frozen" in February 2020; HSPG would be doing what it could to maximise its opportunities to influence the project. The consultation had not raised anything unexpected. HAL was doing further work was being done on the Preliminary Environmental Information Report. Work was also being done on the noise envelope design.

**Joint Spatial Planning Framework:** MT reported on the progress with production of the Joint Spatial Planning Framework (JSPF). This would address the likely impact of Heathrow expansion and finding ways to deliver on local planning authorities' policy objectives. In particular it would look at the growth likely to be generated by expansion and the capacity within the LPAs in the HSPG area to accommodate this. HSPG considered that HAL was being too selective about what was included within their scheme and looked to the scope for relocating office and other provision in adjacent LPA areas. It was envisaged that the JSPF would be signed off for consultation in November, with stakeholder engagement during December. In the meantime, HSPG were liaising with the Planning Inspectorate to discuss how the JSPF could be treated as a material consideration through the development consent order process. HSPG were also working on an economic development statement and policy, which was being prepared to a similar timetable. All this work was being informed by a Joint Evidence Base (JEBIS), a revised version of which would be published later in the year.

## **5. Borough and Other Authorities' Updates**

Hillingdon had received the final report of the Inspector examining their Part II Plan report, approving it for adoption – which would take place in January. They were considering starting a full local plan review to take account of the draft London Plan, but no decision had been taken about the timing as yet. TC asked whether any other authority had recently revised their statement of community and LL said she would send a copy of the OPDC's.

Hammersmith and Fulham wouldn't be starting a local plan review in the near future as the Local Plan adopted in 2018. They had received an application for designation as a neighbourhood area from the Avonmore, Brook Green and Addison Neighbourhood Planning Steering Group. The Council had also approved the application to designate the West Kensington and Gibbs Green Community Homes as a neighbourhood area and forum.

Hounslow had completed the regulation 19 consultation on the Great West Corridor/West of Borough draft local plans on 24<sup>th</sup> September. They were working through the response with a



view to submission in February. They were proposing to use the West London Strategic Housing Market Assessment figure for objectively assessed housing need, which was higher than that recommended by the dLP EiP Panel, which would make it easier for them to respond if the Mayor decided to stick with the originally proposed figure.

Brent were starting the regulation 19 consultation on the draft local plan that day. It set a housing target above that recommended by the Panel and they were considering proposing modifications – but as yet had not decided which figure they might use.

Old Oak/Park Royal MDC had received two sets of interim findings from the inspector examining their draft local plan. One dealt with viability and site allocation (including the Car Giant site), the other found that the integrated impact assessment met the legal requirements. The examination was continuing.

Harrow were continuing work on the evidence base to support local plan preparation work.

## 6. Any other business

*Statements of Common Ground:* There was a discussion of the inter-borough work required to prepare statements of common ground to support local plan preparation and examination. ABP said he could provide wording about the planning work of the WLA for statements if that would be helpful.

*Training:* ABP said that the Chief Planner's Group has discussed whether it would be worthwhile to consider commissioning and delivering training for planners (and those in related spatial development/property-based professions) at West London level. It was noted that many borough officers had particular areas of expertise and could provide training and that it would be worth asking whether anyone would be prepared to put themselves forward.

**ACTION** – ABP to be informed of any borough officer with a particular expertise who was willing to provide training.

The next meeting would be on Thursday 16<sup>th</sup> January 2020, at 10 am in Room 4.12 at Perceval House.

## West London Alliance

### Planning Policy Officers' Group

#### meeting notes of 16<sup>th</sup> January 2020 **draft**

**Present:** Steve Barton (chairing, Ealing); Rita Brar (Barnet); Paul Lewin (Brent); Sam Cuthbert (Ealing); Shay Kelleher (Hammersmith and Fulham); David Hughes (Harrow); Jacob Tong (Hounslow); Chloe Horner (OPDC); Josephine Vos (Transport for London); Andrew Barry-Purcell, Luke Ward (WLA).

**Apologies:** Michael Thornton (Heathrow Strategic Planning Group); Tom Campbell, Julia Johnson (Hillingdon) Alison Bradshaw (TfL)

ITEMS / ACTIONS	LEAD
<p><b>1. Chair's welcome and previous notes</b></p> <p>Steve Barton (SB) welcomed members of the Group. The note of the previous meeting on 24<sup>th</sup> October 2019) was approved.</p>	
<p><b>2. National Planning</b></p> <p>SB reported that Jake Berry, Minister of State at the Ministry of Housing, Communities and Local Government had indicated that the Accelerating Planning White Paper would be published following the end of the debate on the Queen's Speech.</p> <p>Andrew Barry-Purcell (ABP) noted that in a recently released decision on a recovered planning appeal relating to Westferry Printworks in Tower Hamlets (<a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/857952/20-01-14_DL+IR_Westferry.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/857952/20-01-14_DL+IR_Westferry.pdf</a>) the Secretary of State had indicated he was giving the draft London Plan "moderate weight" in decision-making at this stage.</p>	
<p><b>3. Regional Planning</b></p> <p><b>a) Draft London Plan</b></p> <p>The meeting discussed the Mayor's "minded to publish" version of the draft London Plan (dLP) that he had submitted to the Secretary of State for Housing, Communities and Local Government and the issues that arose from it that might affect future joint work in West London. The Mayor had accepted the Panel's recommendations on housing targets and house size requirements and it was felt that the outcome – which had seen a 22% reduction in West London authorities' housing targets - had shown the value of joint work at sub-regional level. SB said that this might be the time to reiterate the offer made by the West London Alliance when first commenting on the dLP to joining with the GLA to devise a more consensual approach to planning to meet housing need in general, and small sites targets in particular.</p> <p>A number of concerns remained; the employment policies in particular would be undeliverable and the failure of the dLP to plan for delivery of all the housing required to meet assessed need would be likely to cause nervousness among planning authorities outside London.</p> <p>Rita Brar (RB) noted that the Secretary of State had already asked for more time to consider the dLP, to 17<sup>th</sup> February. It was unclear whether this would allow enough time for the London Assembly to vote on it before the start of the pre-GLA election purdah period on 23<sup>rd</sup> March. In the meantime,</p>	

the GLA had said that work would continue on their Housing Supplementary Planning Guidance. Paul Lewin (PL) said that Brent would be submitting their local plan to the Secretary of State in March and the Secretary of State's decision on the dLP could make a significant difference on some issues. They would be meeting GLA representatives shortly to discuss the representations they had made on the local plan, which included a hard line on employment land. Interestingly, the GLA were also working with Brent on Staples Corner and this was exposing many of the practical issues that made implementation of dLP policy difficult – including fragmentary land ownerships and multiplicity of leases. It seemed likely that Brent would have to press ahead and deal with the GLA's objections through the examination process, perhaps informed by additional viability evidence.

Shay Kelleher (SK) said that the dLP was based on a false assumption that London could plan its way through meeting challenges and that a more balanced approach to regional development was required. SB agreed that there was a need for a city region approach and pointed to the experience of authorities working together on spatial frameworks. This was being picked up by the authorities in the Heathrow Strategic Planning Group, which was preparing a Joint Strategic Planning Framework (JSPF) for the area around the airport.

There could be scope for a West London strategic development framework, drawing on the various West London research projects that had been commissioned through the WLA and using the Heathrow JSPF as a model. This might help with demonstrating compliance with the duty to cooperate and as a basis for discussions with local planning authorities outside Greater London on issues like employment land substitution. It was agreed that it might be worth testing the appetite for sub-regional work of this kind through the West London Economic Prosperity Board.

**ACTION** – An item on the spatial planning response to the London Plan should be put on the agenda for the next meeting.

ABP

#### b) Mayor's Homebuilding Capacity Fund

There was a discussion of progress in projects funded by the Mayor's Homebuilding Capacity Fund.

Ealing was out to tender for a characterisation study and work on design for small sites. Barnet had recently appointed transport consultants (Urban Flow) to support work on an Edgware supplementary planning document. Brent had now appointed an officer to prepare a masterplan for the Neasden Growth Area and it was expected that a draft SPD would be issued for consultation by the end of the year. Hounslow were commissioning work to develop a tool that could be used to inform site allocations, identifying development constraints and potential capacity numbers and which could be linked with 3D visualisation. They were appointing a project manager and would then recruit others to develop the concept further.

### 4. Sub-regional planning

#### a) Joint Evidence Base: Current work

**Affordable Workspace:** ABP reported that a revised draft report had been received, but this was of poor quality and failed to address the issue that had been highlighted as being of central concern to boroughs – workspace affordability thresholds that for each authority. The draft was more of a literature review and some of its conclusions on viability were positively unhelpful. A meeting was being arranged with the consultants to agree a way forward to bringing the current commission to an end. Consideration would then be given to commissioning more focussed work dealing

specifically with affordability. SK said that Hammersmith and Fulham were appointing Stantec (formerly Peter Brett Associates) to advise on the way forward. ABP said that a potential way forward would be to appoint them to advise the WLA on the best way forward. He agreed to report back on progress to the next meeting.

**Strategic Infrastructure Delivery Plan:** Sam Cuthbert (SC) reported that following appointment of Atkins to prepare the Strategic Infrastructure Delivery Plan an inception meeting had been held on 30<sup>th</sup> October 2019. Since then they had been carrying out desk-based research; a second steering group meeting was being organised for 29<sup>th</sup> January which would discuss three discussion papers on growth and population projections, existing and planned infrastructure projects, and a spatial overview of the property market and key sites.

#### **b) Use of planning powers for training and skills**

ABP reported that a session on possibilities for sub-regional work on improving use of the planning system to secure opportunities for training and skills picking up on the findings of the survey that had been reported to the last meeting of the Group, was being held on 20<sup>th</sup> January. Both skills and planning officers would be represented. A report on the outcome would be given to the next meeting.

ABP

#### **c) Waste planning**

**Hosting of the West London Waste Plan website:** ABP reported that the West London Waste Plan website (<http://www.wlwp.net/>) was currently hosted by consultants under an agreement with Hillingdon. The consultants had said that they did not want to continue the arrangement. He proposed that if it was felt the site should be retained, it should be brought within the WLA's web presence. There were two options – to maintain the site as a separate microsite, which would require paying for renewal of the domain name and involve 2-3 days' work. Alternatively, there could be a landing page for the Waste Plan on the WLA site and the content could be put underneath it. This would be WLA branded and would be quicker and cheaper to do.

It was agreed that it was important to retain the waste plan web presence, but there was no clear preference about the approach that should be taken.

ABP

**ACTION** – ABP to work up a proposal for bringing the waste plan within the WLA web presence and circulate details to members.

**Waste planning - next steps:** ABP noted that in previous discussions it had been agreed to wait to pursue revision of the West London Waste Plan until the new London Plan and its waste apportionments had been formally published.

It was agreed that there was a need to discuss what appetite there was for joint work on waste planning. In the past Hillingdon had taken the lead on this issue and they should be asked whether they would want to do the same for any work that was agreed on. It was agreed that this should be discussed at the next meeting.

ABP

#### **d) West London Orbital**

*Stage 2 work: Economic Benefits/Funding*

ABP reported that the second stage of work to refine the business case for the WLO, focussing

particularly on feasibility issues, was now underway. As part of the work on economic benefits of the WLO being carried out by Steer Group, there had been a workshop for borough planning and transport officers and other stakeholders on 16<sup>th</sup> December 2019. The consultants had been meeting with local planning authorities along the route and would now be contacting them to start detailed work on updating development capacity assessments for areas around stations. A workshop was also being organised as part of the work on funding options commissioned from Grant Thornton/Mott MacDonald to take place in February.

He noted that the Strategic Investment Pool funding secured to support the costs of developing the West London Orbital and funding borough masterplanning and other work on areas that would be served by the WLO either directly or by interchange had been formally approved by the London boroughs. Arrangements for receiving and administering the funding – including distribution of masterplanning funding to local planning authorities – was underway. It was likely to involve a light-touch memorandum of understanding that would set broad overall objectives and reporting requirements. He would keep the Group informed of progress.

ABP

#### **e) Economic Prosperity Board/Growth Directors' Board/Chief Planners' Group**

ABP reported that the proposed WLA Growth Strategy was due to be discussed in final form by leaders on 26th February.

At the meeting of the west London Economic Prosperity Board on 20<sup>th</sup> November 2019 leaders had been strongly supportive of cross-borough work on use of the planning system to deliver skills and training opportunities.

Capital West London would be attending MIPIM and any thoughts about development opportunities boroughs wanted them to promote would be welcome.

ALL

#### **f) Heathrow Strategic Planning Group**

Michael Thornton (MT) had sent a written report on the work of the Heathrow Strategic Planning Group (HSPG).

- A pre-Christmas Civil Aviation Authority (CAA) ruling to restrict early expenditure on land acquisition and construction cost meant that the Heathrow Airport Limited (HAL) programme for the north-west runway opening would be delayed from 2026 to 2029ish, build out of associated development would also proceed slower given the later start. The HSPG considered that this delay was beneficial as it allowed time for surface transport measures etc to catch-up.
- The development consent order (DCO) for expansion was now likely at the end of 2020
- As a result of these changes, all the growth models for expansion, which feed into the Preliminary Environmental Information Report, transport models and everything else now needed to be reset.
- HAL would be conducting further public consultation mid-April to June – focussed on aspects where more information was now be available and, presumably, consequences of changes in programme
- Further HAL Airspace Change stakeholder engagement had just started – to end in February before further submissions to the CAA on a long list of flight path options – all local

authorities affected had been approached directly by HAL.

- Regardless of all these delays, the HSPG's Economic Development Vision and Action Plan (EDVAP) and JSPF were going through members approval processes and would be reported to the HSPG Leaders Board on 20<sup>th</sup> February for approval. A revised and designed version of the JSPF would be circulated shortly.
- The HSPG Spatial Planning Sub-Group meeting on 6<sup>th</sup> February would consider the methodology / brief for a comprehensive update of the Joint Evidence Base and Infrastructure Study Update – the draft output would be discussed at a workshop in April. This would reflect the latest understanding of the DCO growth programme, content, figures on 'residual' demand for development not covered by the DCO, update of the Oxford Economic growth model and the London Plan outcome.
- In March - April decisions would be taken on the next steps with JSPF – for example daughter projects including closer look at industrial land availability and densification etc, the interaction area, and critical infrastructure.

## 5. Borough and Other Authorities' Updates

Transport for London reported that the inspectors conducting the examination of the Westminster City Plan had indicated their view that it was appropriate to test general conformity with the London Plan using the emerging new London Plan "albeit the extant London Plan cannot be disregarded" ([https://www.westminster.gov.uk/sites/default/files/insp1 - appointed inspectors note 1 to council westminster local plan.pdf](https://www.westminster.gov.uk/sites/default/files/insp1_-_appointed_inspectors_note_1_to_council_westminster_local_plan.pdf)).

OPDC reported that consideration was being given to the interim report by the inspector conducting the examination of their draft plan relating to the Car Giant site in the context of the Corporation's wider strategy. It had been decided not to proceed with the road proposal between the proposed HS2 station and Scrubs Lane that would have been funded through the Housing Infrastructure Fund as this would have involved acquiring land on the Car Giant site, which would remain as strategic industrial land. The Corporation's Board would be meeting at the end of January to agree the way forward with a view to going back to the inspector in February. It was hoped that the changes to be proposed to the draft plan could be treated as minor modifications, in which case there would be public consultation after the Mayoral election with plan adoption early in 2021. If there was a requirement to carry out another regulation 19 consultation the programme could be delayed by a further eighteen months. It was likely that the Corporation's strategy would shift, with a renewed focus on public sector land.

Hammersmith and Fulham had adopted its local plan in 2018 so is now concentrating on specific projects including a Railway Arches SPD, an Affordable Workspace/economic obligations SPD and the Hammersmith Town Centre Masterplan/SPD. These would be consulted on in due course, with timing depending on pre-election purdah requirements – on which advice was being sought.

Barnet would be conducting its regulation 18 local plan consultation between 27<sup>th</sup> January and 16<sup>th</sup> March. The plan would set a housing target of 46,000 over the Plan period. A draft Infrastructure Delivery Plan would be available shortly. Regulation 15 consultation on a West Finchley Neighbourhood Plan had started. A Transport Strategy would be issued for consultation in February. The Council had received consultants' advice on revised Community Infrastructure Levy rates.

Brent had received few responses to their proposed article 4 direction with regard to changes of use from industrial to residential uses. There had been an objection to the proposed direction dealing with houses in multiple occupation that was being considered. Their draft local plan would use the

dLP housing target.

Hounslow intended to submit their Great West Corridor/West of Borough local plans to the Secretary of State at the end of March. They would then proceed to a full local plan review and proposed to use their SHMA objectively assessed need for the housing target. Consultation on a draft CIL charging schedule with updated rates would close in the next three weeks.

Ealing was continuing work on a draft local plan, which would be consulted on later in the year. Work was also under way to set a CIL.

## 6. Any other business

*Census 2021:* ABP said that the Office for National Statistics was keen to engage with boroughs about the 2021 Census. It was agreed that members would consider whether there were any issues that they would want to raise.

*Dates of meetings 2020-21:* It was noted that meetings of the Group would take place on:

Thursday 7<sup>th</sup> **May** 2020, 2pm  
Thursday 2<sup>nd</sup> July 2020, 2pm  
Thursday 22<sup>nd</sup> October 2020, 2pm  
Thursday 28<sup>th</sup> January 2021, 2pm

The next meeting would be on Thursday 7<sup>th</sup> May 2020, at 2 pm in Room 3.11 at Perceval House.



## West London Alliance

### Planning Policy Officers' Group

meeting notes of 7<sup>th</sup> May 2020 (held remotely) **draft**

**Present:** Steve Barton (chairing, Ealing); Nick Lynch (Barnet); Paul Lewin (Brent); Sam Cuthbert, Brianne Stolper, Ian Weake (Ealing); David Hughes (Harrow); Tom Campbell (Hillingdon); Jacob Tong (Hounslow); Michael Thornton (Heathrow Strategic Planning Group); Peter Farnham (OPDC); Josephine Vos (Transport for London); Andrew Barry-Purcell (WLA).

**Apologies:** Julia Johnson (Hillingdon) Alison Bradshaw (TfL)

ITEMS / ACTIONS	LEAD
<p><b>1. Chair's welcome and previous notes</b></p> <p>Steve Barton (SB) welcomed members of the Group. The note of the previous meeting on 16<sup>th</sup> January 2020 was approved.</p>	
<p><b>2. National Planning</b></p> <p>SB noted that the Government had published a document setting out their proposals for changes to the planning system in March, entitled "Planning for the Future". These included a planning white paper "to modernise our planning system, ensuring it supports the delivery of homes that local people need and creates more beautiful and greener communities"; reviewing the formula for calculating local housing need, setting a deadline for all local authorities to have an up-to-date local plan; reforming planning fees (including an automatic rebate for successful appeals); ensuring land for housing is built out through greater transparency about land options; and expanding the use of zoning tools to support development. It also highlighted the scope for further extensions of permitted development rights.</p> <p>Andrew Barry-Purcell (ABP) said that as part of the North West London response to the Covid pandemic, he was monitoring the state of local planning services. So far, all West London boroughs were providing as close to a normal service as possible, with minor changes to areas like enforcement and organisation of "remote" planning committee meetings. There were signs of construction activity resuming. In discussion it was suggested that access to materials could be a constraint on future building work.</p> <p>ABP also reported on work that was being commissioned by the WLA from Oxford Economics on the impact of the pandemic on the West London economy (the brief had been circulated in advance of the meeting).</p>	
<p><b>3. Regional Planning</b></p> <p><b>a) Draft London Plan</b></p> <p>It was noted that the Mayor had written to the Secretary of State with regard to the direction to make changes to the London Plan asking for discussions about the scope to modify the directed changes to remove policy ambiguities and achieve the necessary outcomes. One factor raised was information that had not been available when the directions were drafted.</p> <p>Tom Campbell (TC) said that at an Association of London Borough Planning Officers meeting the</p>	



GLA had explained that the new information mentioned related to updated modelling relating to parking standards. They had suggested that some of the directions (those on employment land in particular) did not make sense in context. Josephine Vos (JV) added that options were being put to the Ministry for Housing, Communities and Local Government, including with regard to some of the terminology used in the directions. If discussions were pursued it was likely this would take months rather than weeks.

#### 4. Sub-regional planning

##### a) Joint Evidence Base: Current work

**Affordable Workspace:** ABP reported that having reviewed a further draft report from the consultants, the project steering group had come to the conclusion that this required so much work to remove potentially misleading and unhelpful information that it was not worth the time and work required to bring it to a publishable standard. It had been agreed instead to produce a condensed version based around the appendix in the draft containing design briefs based on schemes elsewhere, incorporating some of the text from the main report on what makes a workspace affordable, rationales for intervention, the different types of operator and operating models. Although this would not address the requirements in the Study Brief it was felt that it could be a useful introduction to the issue and provide some helpful information about what has been delivered elsewhere.

**Strategic Infrastructure Delivery Plan:** Sam Cuthbert (SC) reported that Atkins would be circulating an interim report shortly. The next stage would be for Atkins to engage with infrastructure providers; this had originally been planned for July, but the pandemic meant that the programme would have to be reviewed.

There was a discussion about the potential impacts of the pandemic on the need for infrastructure of different kinds. In particular, what transport provision might have to be made to avoid large-scale car use after the lifting of lockdown. JV drew attention to the Mayor's recent press release about the allocation of highway space for walking and cycling and acceleration of programmes like Liveable Neighbourhoods to support this.

##### b) Covid-19 recovery

The Group discussed potential planning policy work to support the Covid-9 recovery stage – and implications for the Group's work programme. At present it was considered too early to think about making changes to local plans to reflect changes as a result of the pandemic.

There was concern that Government might introduce further deregulatory measures (such as additional permitted development rights) as part of any recovery package. Given the often poor quality of homes delivered as a result of extension of PD, this would be hard to square with the recommendations of the Government's Building Better, Building Beautiful Commission.

There was discussion about some potential areas of work.

The first related to the West London town centre network. This could examine the impacts the pandemic had had on town centres - the effects that large-scale working from home might have on local spending patterns and the town centre network and whether job losses and business failures in the retail and catering sectors in particular would accelerate pre-pandemic trends – and more widely at the future of these sectors in West London centres and the implications for the town centre hierarchy here.

ABP

As part of this there might be scope to look at the potential for use of now vacant town centre space for affordable/flexible “near home” workspace. This might include looking at ways of making the most effective use of the flexible town centre use permitted development rights.

The second related to housing delivery. The pandemic was likely to affect housing starts and might make meeting the National Housing Delivery Test more difficult for reasons demonstrably beyond local planning authorities’ control. This could be addressed by reducing the thresholds for delivery against identified need for boroughs to take action.

There could also be increased difficulty in demonstrating a five year housing land supply because of unimplemented permissions lapsing as a result of the pandemic. This could be addressed both by automatically extending planning permissions lapsing in 2020 by twelve months and by making the definition of “deliverable” in the National Planning Policy Framework more flexible.

ABP noted that the Group had previously discussed the scope for doing work on barriers to housing delivery in West London. This had been put to one side awaiting the outcome of the London Plan process, but there would be scope to pursue it now, perhaps identifying particular factors raised by the pandemic (such as availability of materials and the scope for use of new construction techniques).

It was also felt that there would be value in defining what genuinely affordable housing meant, defined in terms of incomes rather than by product. This could be coupled with an assessment of how applicable the National Housing Need Methodology might be to West London’s particular circumstances.

It was also agreed that there was value in looking at options for a West London Spatial Development Framework identifying common themes for the sub-region. SB noted that the Planning Officers’ Society had changed their view and were now supportive of informal frameworks that did not require a full examination process, operating in effect as an expanded statement of common ground. This would provide a basis for sharing resources and promoting collaboration in ways that would be valuable for supporting recovery and encouraging inward investment.

**AGREED** – That these areas of work should be worked up into firmer proposals to be taken forward as part of West London’s work on

ABP

### c) Use of planning powers for training and skills

ABP reported that work was continuing to develop possibilities for sub-regional work on improving use of the planning system to secure opportunities for training and skills, with further discussions among borough skills/training leads.

### d) Waste planning

**Hosting of the West London Waste Plan website:** ABP reported that work was underway to bring the West London Waste Plan website within the WLA’s web presence, in accordance with the decision taken at the previous meeting.

*Post-meeting note: This has now been completed – the site can be accessed at <http://wlwp.wla.london/>.*

**Waste planning - next steps:** It was agreed to postpone further discussion about potential joint work on waste planning until the next meeting.

## e) West London Orbital

ABP reported that work was continuing on development of the business case for the West London Orbital, although the pandemic had meant some aspects of the work have had to be postponed as Transport for London staff working on the project have been furloughed and the timescale for other workstreams was under review. In particular, the technical work being led by Network Rail on the capacity of the existing infrastructure to accommodate the projected WLO service level is proceeding.

The two areas of work on which the WLA is taking a leading role (and part-funding) dealing with the economic benefits of the WLO and funding/financing were continuing. The economic benefits work by Steer/Arcadis had identified potential for the WLO to generate £13-18 million in wider economic benefits a year by 2031. These arose particularly from agglomeration and labour market benefits and those from overcoming market constraints on competition. The consultants were updating the estimates of additional/accelerated homes and increases in employment supported by the WLO and he thanked borough colleagues who had provided them with information.

On funding/financing, Grant Thornton/Mott MacDonald had started modelling potential options around use of Community Infrastructure Levy, planning obligations, business rate retention, public sector-led development (both development of public sector-owned sites and use of local authority powers to facilitate development that could provide funding) and workplace parking levies. They were also starting work to prepare an action plan setting out the practical steps that boroughs, the Mayor/TfL and others would have to take to secure funding – from the sources being modelled and from others including the Housing Infrastructure Fund and other centrally/regionally-administered funds.

## f) Heathrow Strategic Planning Group

Michael Thornton (MT) reported that the HSPG's Joint Strategic Planning Framework (JSPF) had been signed off in February, shortly before the decision of the Court of Appeal striking down the Airport National Policy Statement. Heathrow Airport Limited's Chief Executive had recently told the House of Commons Transport Select Committee that a new runway would be 10-15 years away at best. The pandemic had seen passenger numbers at the airport falling by 97% and if the third runway was no longer justified by passenger numbers there would be a need to reassess the future of the airport and its relationship with neighbouring areas.

The HSPG was working on options for this changed future. Even if there was to be no expansion there was still a need to promote non-car based access to the airport, including improved rail access. Earlier that week there had been a meeting to agree options for the Group's future work. As central Government was not renewing its funding, this work would have to be from local authority contributions. These discussions had highlighted that there was a continued role for future work at strategic level in the area covered by HSPG, and they were interested in any West London work on issues like town centres. They hoped to return to the JSPF in time.

## 5. Borough and Other Authorities' Updates

Barnet completed its regulation 18 local plan consultation on 16<sup>th</sup> March. Given current events it might be necessary to slip the timetable for regulation 19 consultation. On neighbourhood planning, the Mill Hill Forum was coming up for redesignation and there might be a rival proposal. There would be interest in discussion of ways to carry out more effective and less costly consultation.

**AGREED** – That an item on improved approaches to consultation should be added to the agenda for the next meeting.

**ABP**

Brent had submitted their draft local plan for examination on 17<sup>th</sup> March. They had received an initial letter from the Planning Inspectorate raising a number of issues including conformity with the London Plan (where the GLA would not be giving a statement until the London Plan had been finalised. They had not said how they intended to conduct hearings in the current circumstances. Highways England had raised an issue regarding the M1. JV said that although TfL's response on this issue would be delayed because of the pandemic they would be writing to give their view that no development in Brent would impact on the motorway.

Ealing was working as usual through the pandemic. They were making good progress towards regulation 18 consultation towards the end of October for 10 weeks, although the timing would depend on putting virtual consultation arrangements in place. On the current timetable it was intended to submit for examination in autumn 2021 for adoption before May 2022.

Harrow: were also working as usual. They were working towards regulation 18 consultation late 2020/early 2021.

Hillingdon: would be launching their local plan review shortly. They were working on a planning obligations supplementary document, their brownfield land register entry and a review of article 4 directions.

Hounslow intended to submit their Great West Corridor/West of Borough local plans to the Secretary of State in June. They intended to start a full local plan review in September.

Transport for London: although a large number of staff had been furloughed, they were trying to keep the planning service going. JV said she would circulate details of those still working.

## **6. Any other business**

It was noted that the next meeting would be on Thursday 2<sup>nd</sup> July 2020 at 2pm

## West London Alliance

### Planning Policy Officers' Group

#### meeting notes of 2<sup>nd</sup> July 2020 (held remotely) **draft**

**Present:** Steve Barton (chairing, Ealing); Nick Lynch (Barnet); Ciara Whelehan (Brent); Sam Cuthbert, Brianne Stolper (Ealing); Janda Thajinder (Hammersmith and Fulham); David Hughes (Harrow); Tom Campbell (Hillingdon); Jacob Tong (Hounslow); Michael Thornton (Heathrow Strategic Planning Group); Peter Farnham (OPDC); Josephine Vos (Transport for London); Andrew Barry-Purcell (WLA).

**Apologies:** Julia Johnson (Hillingdon) Alison Bradshaw (TfL)

ITEMS / ACTIONS	LEAD
<p><b>1. Chair's welcome and previous notes</b></p> <p>Steve Barton (SB) welcomed members of the Group. The note of the previous meeting on 7<sup>th</sup> May 2020 was approved subject to amendment of the note of item 4(b) to read: It was also agreed that there <b>may be</b> value in looking at options for a <u>West London Spatial Development Framework</u> identifying common themes for the sub-region."</p>	
<p><b>2. National Planning</b></p> <p>The Planning White paper was still awaited and there was a discussion of the steps that should be taken to inform a West London response.</p> <p>Nick Lynch (NL) raised the recent changes to the General Permitted Development Order allowing two additional storeys to be built on dwellinghouses. He asked whether any borough was considering making an article 4 direction. Sam Cuthbert (SC) thought the new permitted development right was unlikely to be widely used in Ealing, but might be used as leverage to secure additional storeys in planning application discussions. Tom Campbell (TC) noted that the conditions on the new permitted development right dealt with many of the things that would usually be considered in a planning application for a development of this kind, but with a smaller fee and without scope to secure affordable housing (although CIL would still be payable). David Hughes (DH) noted that building control might be more of an issue – the new fire control regulations might prevent many developments of the kind covered. TC noted that the permitted development right was subject to prior approval on the ground "of impacts of the introduction of, or an increase in, a residential use of premises in the area on the carrying on of any trade, business or other use of land in the area", which would enable the impacts on shopping centres to be taken into account.</p>	
<p><b>3. Regional Planning</b></p> <p><b>a) Draft London Plan</b></p> <p>It was noted that the Secretary of State had yet to reply to the Mayor's letter of 24<sup>th</sup> April about the direction to make changes to the London Plan asking for discussions about the scope to modify the directed changes to remove policy ambiguities and achieve the necessary outcomes.</p> <p><b>b) Mayor's Homebuilding Capacity Fund Projects- Progress</b></p> <p>NL reported that the joint Barnet/Harrow draft supplementary planning document on the Edgware growth area would be issued for consultation in the autumn with a view to adoption in December.</p>	

<p><b>4. Sub-regional planning</b></p> <p><b>a) Joint Evidence Base: Current work</b></p> <p><b>Affordable Workspace:</b> ABP reported that a draft of the proposed condensed report was still awaited. He said he would chase this up.</p> <p><b>Strategic Infrastructure Delivery Plan:</b> Sam Cuthbert (SC) noted that Atkins had issued an interim report which had been circulated for comment shortly. The next stage would be for Atkins to engage with infrastructure providers; this had originally been planned for July, but the pandemic meant that the programme would have to be reviewed.</p> <p>There was a discussion about the potential impacts of the pandemic on the need for infrastructure of different kinds. In particular, what transport provision might have to be made to avoid large-scale car use after the lifting of lockdown. JV drew attention to the Mayor's recent press release about the allocation of highway space for walking and cycling and acceleration of programmes like Liveable Neighbourhoods to support this.</p> <p><b>b) Covid-19 recovery</b></p> <p>ABP reported that the West London Alliance (WLA) had published research it had commissioned from Oxford Economics on the potential impact of the Covid pandemic on the West London economy and that this was being used to inform the preparation of a Build and Recover strategy that would set out action that would be taken by West London boroughs to support recovery from the pandemic, and a set of "asks" of central government and the Mayor for the resources and powers needed to deliver them. There may be a need for further, more detailed research to support this process, building on the Oxford Economics report.</p> <p>Michael Thornton (MT) noted that Oxford Economics had highlighted the impact on Heathrow Airport and the implications of this for the sub-regional economy. The International Air Transport Association projected that recovery in the aviation sector would lag by two years behind that for the wider economy. It would be important to understand the supply chain and other wider links between Heathrow and the rest of the West London economy, including the hospitality and visitor sectors.</p> <p>SB mentioned that Brent and Ealing were supporting an <u>Industrial Land Commission</u>; Tom Cardis (TCa) said that the Old Oak/Park Royal Development Corporation would also be supporting it. It would report early in 2021. Initial work had identified particularly vulnerable sectors. Microbusinesses were particularly at risk. The Commission would issue a call for evidence and there was general support for a West London submission. MT said he would be able to contribute, particularly as regards industrial land beyond the Greater London boundary.</p> <p>On <u>town centres</u> SB said there was scope for sub-regional work on retail and town centres. There was general support for further discussion of the scope for such a study and it was agreed that there should be a separate meeting to develop the idea and report back.</p> <p><b>ACTION:</b> ABP to arrange a meeting to discuss the scope for a West London retail needs and town centre study.</p> <p><u>Improving community engagement</u> was also a pressing issue. SB said Ealing particularly wanted to</p>	<p>ABP</p> <p>ABP</p>

extend beyond the groups who customarily took part in local plan and development management processes, especially to younger people and Black, Asian and Minority Ethnic communities. They were commissioning Arup to help develop an engagement strategy and interactive tools for local plan and other processes. This work would include marketing the planning process, something planning had traditionally not been good at in the past. It was hoped to trial the new approaches as part of the regulation 18 local plan consultation proposed for October. If a larger and more diverse response to local plan proposals could be delivered it was likely that different perspectives would emerge and that the council's position at examination would be strengthened. However, Communications teams tended to be risk averse, particularly with regard to use of social media. Elected members had given careful consideration before agreeing the work, but they were clear that the local plan had an important role in recovery from the pandemic and having community support was essential.

Ciara Whelehan (CW) said that Brent had not consulted in the past three months, since submission of their local plan. They had dedicated substantial resources to plan consultation, sending a leaflet to every home in the Borough. They had used the Commonplace community engagement package, but this had not generated a larger number or wider range of respondents. They had also done extensive engagement work around neighbourhood community infrastructure levy.

SB agreed to share the specification for the Arup work, and it was agreed that community engagement might be a suitable topic for a webinar in the autumn.

**ACTION:** SB to share specification for Ealing engagement work.

Further consideration to be given to holding a webinar on engagement in the autumn

**SB  
ABP**

### **c) Waste planning**

It was agreed to keep potential joint work on waste planning as a standing item on the Group's agenda so a prompt decision could be taken when further action was required.

### **e) West London Orbital**

ABP reported that work was continuing on development of the business case for the West London Orbital, although the pandemic had meant some aspects of the work would take longer than programmed. The technical work being led by Network Rail on the capacity of the existing infrastructure to accommodate the projected WLO service level was proceeding. The two areas of work on which the WLA is taking a leading role (and part-funding) dealing with the economic benefits of the WLO and funding/financing were also continuing. It was likely these would report in the autumn. He thanked all those who had provided large amounts of detailed information for these studies.

### **f) Heathrow Strategic Planning Group**

MT reported that the HSPG was focussing its work on pandemic recovery issues, working with the WLA, the Local Government Association's Strategic Aviation Special Interest Group and Heathrow Airport Ltd (HAL). Continuing to make the case for more sustainable surface access to the Airport even without expansion was a particular priority – both through new infrastructure and by promoting active travel approaches. Work was also continuing on changes to airspace management, which required complex balances of often conflicting interests. HSPG was also engaging with the Independent Commission on Civil Aviation Noise.

As far as the HSPG Joint Strategic Planning Framework was concerned, he said that even if HAL's



appeal to the Supreme Court on the validity of the Airport National Policy Statement (ANPS) was successful, the Government would be likely to review the ANPS. Given this HSPG intended to consider adapting the JSPF for a two runway scenario. The timescale for this had not been decided, but it would probably be done alongside the work on access – probably early 2021.

The Government had consulted on the scope for Freeports, with a liberalised planning regime. He did not know what HAL would say or do in response, but this would have to be watched as it might undermine the HSPG's approach to planning and sustainable access.

SB said that the JSPF was a significant achievement, having secured cross-party and cross-boundary support. It would be valuable to produce a revised version as much in it remained relevant even without expansion. In particular, there could be scope to leverage additional resources for local infrastructure and other priorities. HAL should be required to make a proper contribution towards the continued prosperity of the area and there was a need for discussions with them to resume. If expansion was no longer in prospect there would be greater scope for those opposed to it to get involved with this work.

TC said that he would check with Hillingdon's economic development team about whether it was intended to comment on the Freeport consultation; he thought it was unlikely the Council would favour anything that reduced local planning authorities' powers.

MT concluded by suggesting HAL would have to adopt a different attitude, seeking alliances with local stakeholders. There was still work for HSPG and boroughs to do to influence their future approach.

## 5. Borough and Other Authorities' Updates

Barnet would be submitting their local plan for examination later in the year. On neighbourhood planning the Council was encouraging withdrawal of an application for neighbourhood forum status in Mill Hill.

Brent were in discussion with the Planning Inspectorate about virtual hearings, when they might take place and how they would run procedurally. No dates had been set as yet, but it was envisaged the examination would take place in October/November. They were waiting to receive examination matters and issues shortly. It was likely that sessions would be more intense, with the same range of issues being discussed in less time.

The Neasden Station Area Masterplan was proceeding well, with completion anticipated October/November. It was envisaged it would be published as a supplementary planning document in March 2021.

The Council had agreed three month extensions for CIL payments. The approach would be reviewed in light of the production of promised regulations on the issue.

Ealing intended to go out to regulation 18 consultation on their local plan and draft CIL charging schedule in October with consultation running until the new year. Their characterisation study addressing tall buildings and density was progressing and further details could be given at the next



<p>meeting.</p> <p><u>Hammersmith and Fulham</u> intended to publish SPDs on railway arches and affordable workspace in December. Regeneris had been commissioned to carry out viability work on affordable workspace and an update would be given to the next meeting.</p> <p><u>Harrow</u>: intended to go out to regulation 18 consultation in early 2021. Their characterisation/tall buildings study was proceeding well, as was work on small sites - although this had been slowed by issues with site visits; the Council was probing how flexible the GLA would be about slippage. They were being pragmatic about allowing time for CIL payments.</p> <p><u>Hillingdon</u>: had no updates since the previous meeting.</p> <p><u>OPDC</u>: were working on their response to the interim findings of the inspector examining their local plan and to update their evidence base. It was intended to submit modifications in January 2021 with a view to plan adoption in autumn 2021.</p> <p><u>Transport for London</u>: Jo Vos said that TfL were leaving it to individual collecting authorities to decide policies on deferral of Mayoral CIL payments. Where there was no local policy, TfL would have a general approach allowing deferral for 90 days.</p>	
<p><b>6. Any other business</b></p> <p>It was noted that the next meeting would be on Thursday 22<sup>nd</sup> October 2020 at 2pm</p>	

## West London Alliance

### Planning Policy Officers' Group

#### meeting notes of 22<sup>nd</sup> October 2020 (held remotely) **draft**

**Present:** Steve Barton (chairing, Ealing); Nick Lynch (Barnet); Paul Lewin (Brent); Sam Cuthbert, Brianne Stolper (Ealing); David Gawthorpe; David Woodward (Hammersmith and Fulham); David Hughes (Harrow); Tom Campbell; Prag Shah (Hillingdon); Jacob Tong (Hounslow); Michael Thornton (Heathrow Strategic Planning Group); Chloe Horner (OPDC); Josephine Vos (Transport for London); Andrew Barry-Purcell (WLA).

**Apologies:** Julia Johnson (Hillingdon) Alison Bradshaw (TfL)

ITEMS / ACTIONS	LEAD
<p><b>1. Chair's welcome and previous notes</b></p> <p>Steve Barton (SB) welcomed members of the Group. The note of the previous meeting on 2<sup>nd</sup> July 2020 was approved.</p>	
<p><b>2. National Planning</b></p> <p><b>a) "Planning for the Future" white paper</b></p> <p>Consideration was given to the draft West London response to the "Planning for the Future" white paper, which had been discussed at a joint Chief Planners/Planning Policy Officers meeting on 24<sup>th</sup> September. It was agreed that any last comments should be sent to Andrew (ABP) by 1pm on 26<sup>th</sup> October so the response could be submitted by the deadline for comments.</p> <p>There was a discussion about the future role of neighbourhood plans. Nick Lynch (NL) noted that it appeared these would really become local design codes. SB said that even in the current system neighbourhood planning made more sense for parished rural areas than for urban ones.</p> <p>SB noted that the County Councils Network had published a paper on "Planning Reforms and the Role of Strategic Planning" which argued for a new power for local authorities to promote sustainable development.</p> <p><b>b) Other national planning issues</b></p> <p>It was noted that an application for judicial review of the Government's recent changes to the Use Classes and General Permitted Development orders had been made to the High Court; it would be heard shortly.</p>	
<p><b>3. Regional Planning</b></p> <p><b>a) Draft London Plan</b></p> <p>Josephine Vos (JV) reported that discussions were continuing between the Mayor and the Secretary of State with two further areas where directions might be made being raised. NL noted that there was a risk that the so16 version of the Plan would be more than five years old by the time the draft was finally published, which would have implications for the National Housing Delivery Test. ABP said that he would look into the position.</p>	<b>ABP</b>

<p><b>b) Mayor's Homebuilding Capacity Fund Projects- Progress</b></p> <p>NL reported that the joint <u>Barnet/Harrow</u> draft supplementary planning document on the Edgware growth area would be issued for consultation later in the year. David Gawthorpe (DG) said that <u>Hammersmith and Fulham</u> had recently been out to tender for a small sites study and would be awarding a contract shortly. They had had a good response (ten bidders).</p> <p>David Hughes (DH) reported that <u>Harrow's</u> small sites and characterisation studies were both under way. Work on Housing Revenue Account-held small sites was almost complete. The GLA had proved willing to allow funding to be carried over into the next financial year.</p> <p>Sam Cuthbert (SC) reported that <u>Ealing's</u> characterisation work was almost complete; work on preparing design guidance was well underway.</p> <p>Tom Campbell (TC) asked whether there would be a second round of GLA funding. ABP said he would make enquiries.</p>	<p><b>ABP</b></p>
<p><b>4. Sub-regional planning</b></p> <p><b>a) Joint Evidence Base: Current work</b></p> <p><b>Affordable Workspace:</b> ABP said he was chasing up a draft of the proposed condensed report was still awaited.</p> <p><i>Post-meting note: the draft was subsequently received and circulated for comment</i></p> <p><b>Strategic Infrastructure Delivery Plan:</b> SC said that the report was almost ready – the consultants were waiting to hold interviews with some remaining consultees. He would chase progress.</p> <p><i>Post-meeting note: a draft has now been received and circulated for comment.</i></p> <p><b>Proposed West London Town Centre Commercial, Business and Service study</b></p> <p>The Group considered a draft specification for a study of town centre E class uses that had been drawn up in discussion with a sub-group. It was proposed to test the specification with a number of potential consultants and agreed that any further comments on the specification would be provided to ABP by lunchtime on 26<sup>th</sup> October.</p> <p>NL asked whether any borough was proposing to change local plan policies in light of recent changes to the Use Classes and General Permitted Development orders. TC said that Hillingdon had looked at what policies they could and could not apply in light of the changes. Their rule of thumb had been that any policies that specifically referenced “old” uses could no longer be applied. Chloe Horner (CH) said that the OPDC were bringing forward plan modifications to address the changes.</p> <p><b>b) Climate Change Emergency</b></p> <p>ABP noted that one of the threads of the West London Climate Emergency Officers' Group Action Plan was alignment of planning policy with the objective of ensuring West London is a leader in climate change-related planning policy, practice and innovation. To this end he would be organising a workshop about steps planning authorities could take to help tackle the causes and consequences of climate change, particularly in light of government proposals to move building emissions standards away from the planning system and the “Planning for the Future” proposals.</p>	<p><b>ABP</b></p>

SB supported the idea of an event, which could be used to identify further areas for action. Mt asked whether once it had been organised the invitation could be shared with Heathrow Strategic Planning Group members – ABP said it could and that he would keep MT informed of progress. MT added that one angle that would have to be considered was the infrastructure required to support sustainable energy options and electric vehicle charging points.

ABP

It was **agreed** that a sub-group of those with a particular interest would be convened.

### c) Improving Community Engagement

The Group had a discussion to follow up consideration of the issue at the last meeting. SB said that engagement was an issue of particular concern to Ealing. They had commissioned Arup to prepare material for use with their regulation 18 local plan consultation. It was **agreed** that it would be useful to invite Commonplace and Build ID to the Group's next meeting to present their products and this would give an opportunity for a more focussed discussion.

ABP

### d) Waste

SB noted that the West London Waste Plan would have to be revisited at some stage and that work on the climate change emergency might provide an impetus. TC noted that the South London Waste Plan was out for comments, with consultation closing that afternoon.

### e) West London Orbital

ABP reported that work on the West London Orbital was continuing, despite TfL's financial issues. In particular, work on the project's economic benefits was being finalised and a funding and financing study was at an advanced stage. There would be another workshop to feed back on the results of this work early in 2021. He noted that the white paper proposals to replace the Community Infrastructure Levy and section 106 contributions with a single Infrastructure Levy would make funding projects like the WLO more difficult, and that he was discussing making representations jointly with authorities involved with similar projects.

### f) Heathrow Strategic Planning Group

MT reported that Heathrow Airport were fairly confident of success in their appeal to the Supreme Court on the validity of the Airport National Policy Statement, but that even if they were successful the matter would be back with the Government to decide on what to do. They were concerned about the likely situation at the end of the furlough period, as there had been no uplift in business during the summer.

The HSPG was continuing work on surface access, with a view to producing a strategy that looked at what could be delivered in a two runway future which took account both of the impacts of the pandemic and the recovery phase and the need to reduce private car use.

The Government had published a response to the consultation they had held on freeports. The Government was clearly committed to the concept There was speculation about potential bidders for freeport status; it was not clear whether Heathrow would bid or not.

HSPG would be submitting a response to "Planning for the Future" focussing particularly on sub-regional strategic planning options.

The Group's future work programme would depend on the outcome of the Supreme Court case. It was likely that its members would be consulted about potential options in time for a decision to be taken in February 2021 that could be implemented in the following financial year.

## 5. Borough and Other Authorities' Updates

Barnet would submit their plan for examination in spring 2021. They had a neighbourhood plan (West Finchley) that was awaiting referendum, but this could not take place until May 2021 at the earliest under national legislation.

Brent had had their local plan examination, which had completed its hearings the previous Friday. There was more work to do as a result, including consideration of the contribution the OPDC could make to meet the Borough's employment land target. A lower target had been proposed, based on the West London Employment Land report, which had been agreed by the Mayor. In the event the Mayor had submitted a statement of common ground but, despite being invited to take part in the sessions, had not done so.

Highways England had raised potential impacts on the M1 motorway and had not been persuaded by TfL modelling that showed policies would not have such effects (although if there were any, they would not be felt in Brent alone).

They had also been asked to set housing targets for the Borough's neighbourhoods, which was difficult to do.

The Council had agreed three month extensions for CIL payments. The approach would be reviewed in light of the production of promised regulations on the issue.

The remote hearings had worked well. They had used Zoom, but the Inspectorate were able to use MS Teams as well. The Programme Officer had been given the software and she and the Inspector had been made hosts so they could control the sessions (and the microphone). Participants had had to request access via the Programme Officer. There had been an issue with the numbers requesting access and it had been intended to record sessions, but in the event these were managed. There has been a large number of observers, including from other boroughs.

PL agreed to produce a short note on lessons learned from Brent's experience of conducting a remote examination.

Ealing had postponed their regulation 18 consultation until spring 2021, with a view to submission after the May 2022 borough elections. They were intending to produce an issues and options document in December.

They had one neighbourhood forum applying for redesignation. There was one neighbourhood plan.

Hammersmith and Fulham intended to publish SPDs on railway arches and affordable workspace later in the year. Hatch Regeneris had been commissioned to carry out viability work on affordable workspace; the current uncertain economic situation might delay publication of a supplemental planning document.

Harrow were continuing work on drawing together the local plan evidence base with a view to consulting on issues and options in summer 2021.

Hillingdon was a new Local Development Scheme. A budget for the local plan evidence base was being discussed and it was intended to refresh their planning obligations SPD. The new LDS was

PL

<p>planned to be published in early 2021.</p> <p><u>Hounslow</u> intended to seek approval for submission of their Great West Corridor/West of Borough draft plans in November. They were considering revising their article 4 directions to take account of changes to the Use Classes/General Permitted Development orders.</p> <p><u>OPDC</u>: The Corporation's Board had agreed proposed plan modifications. They had had to identify how to meet their housing targets and were now consulting landowners. The modifications would be submitted in February 2021; the Inspector would decide on what further consultation would be required – but there would be some soft community consultation in advance of this.</p> <p>They were also preparing an infrastructure delivery plan and would continue to work with Homes England and national government on funding. They were also revisiting their CIL proposals to see whether these should be taken further, particularly to help inform discussions with Government.</p> <p>It was intended that the OPDC local plan would be published in the autumn of 2021 and that there would be an early review after adoption. This would include looking at how to meet housing targets, affordable housing and the lessons from the pandemic about design.</p> <p><u>Transport for London</u>: There was still no funding settlement with the Government. Some TfL staff were still on furlough but would return at the end of the month. JV drew attention to the updated Streetspace for London website.</p>	
<p><b>6. Any other business</b></p> <p><b>Strategic Flood Risk Assessment</b></p> <p>NL asked about future hosting of the SFRA. PL said that it was currently being maintained by METIS, who had been in touch with him. ABP asked to be kept in the loop as it might be that an arrangement similar to that for the West London Waste Authority might have to be explored.</p> <p>It was noted that the next meeting would be on Thursday 28<sup>th</sup> January 2021 at 2pm</p>	<p><b>PL/ABP</b></p>

## West London Alliance

# Planning Policy Officers' Group

## meeting notes of 28<sup>th</sup> January 2021 (held remotely) draft

**Present:** Steve Barton (chairing, Ealing); Rita Brar, Nick Lynch (Barnet); Claire Bradley (Brent); Sam Cuthbert (Ealing); David Woodward, Rebecca Yee (Hammersmith and Fulham); David Hughes (Harrow); Tom Campbell (Hillingdon); David Dewar (Hounslow); Michael Thornton (Heathrow Strategic Planning Group); Josephine Vos (Transport for London); Andrew Barry-Purcell (WLA).

**Apologies:** Paul Lewin (Brent); Brianna Stolper, Ian Weake (Ealing); Julia Johnson (Hillingdon) Alison Bradshaw (TfL).

ITEMS / ACTIONS	LEAD
<p><b>1. Chair's welcome and previous notes</b></p> <p>Steve Barton (SB) welcomed members of the Group. The note of the previous meeting on 22 October 2020 was approved.</p> <p>Andrew Barry-Purcell (ABP) noted that pressure of work had meant that limited progress had been made on Climate Emergency work, but that he hoped to take matters forward by the next meeting. The Government's welcome decision not to prevent local planning authorities from seeking contributions to fund carbon offsetting measures meant that this work would have to take a different direction from that originally envisaged.</p>	
<p><b>2. National Planning</b></p> <p><b>a) MHCLG Consultation: Supporting Housing Delivery and Public Service Infrastructure</b></p> <p>Consideration was given to the draft West London response to the "Supporting Housing Delivery and Public Service Infrastructure" consultation document from the Ministry of Housing, Communities and Local Government.</p> <p>There was a discussion about the Government's proposals for fee levels for prior approval applications for change of use from commercial to residential (question 4 in the consultation document). It was agreed that the starting point in considering the level of fee should be what would have to be paid in respect of a full planning application, with reduction from that level justified on the basis of a systematic review of the actual level of work involved. The full application fee should be the default option. ABP said he would ensure the response reflected this position.</p> <p>Subject to this, the draft response was agreed.</p> <p><b>b) Housing Delivery Test</b></p> <p>The Group discussed the outcome of the 2020 National Housing Delivery Test outcome. It showed that up to March 2020 delivery in West London had held up well, showing that housing developers still wanted to build in the sub-region.</p> <p>Steve Barton (SB) noted that the housing need figures produced by the Government's proposed revised methodology were undeliverable. Nick Lynch (NL) noted that Barnet was required to produce a housing delivery action plan as a result of the delivery test, having met 94% of their</p>	ABP

<p>target, something they had had to do in all but one of the years the test had been applied.</p> <p>Tom Campbell (TC) noted that there had been a discussion of the new methodology and what the Mayor might do in response at a recent meeting of the Association of London Borough Planning Officers. The Greater London Authority representatives present had downplayed the significance of the new approach following adoption of the London Plan – they would do their own assessment of housing need as part of any London Plan review. The ALBPO had suggested that boroughs write to the Government responding to the change, raising concerns about the deliverability of the new figures. If the Government did not respond it might strengthen boroughs' hands as they could say they had tried to engage, but Government had not responded. David Hughes said that while the London Plan gave coverage for five years it was not clear what might happen then.</p> <p><u>Agreed</u>: that a letter to MHCLG raising concerns about the deliverability of the housing need figures arising from the Government's proposed housing need methodology</p> <p>ABP noted that there was another MHCLG consultation outstanding, dealing with the "Right to Regenerate". It was <u>agreed</u> that it would be worth preparing a West London response to this.</p>	<p>ABP</p> <p>ABP</p>
<p><b>3. Regional Planning</b></p> <p><b>a) Draft London Plan</b></p> <p>TC reported that at the ALBPO meeting the GLA had indicated that they expected to publish the London Plan by the end of February. They had not said anything about a review. They were updating their employment land database and town centre healthchecks. Sam Cuthbert (SC) noted that the current GLA employment land evidence base used data from 2008 as the baseline and it would be interesting to see what methodology they would use going forward.</p> <p><b>b) Mayor's Homebuilding Capacity Fund Projects- Progress</b></p> <p>SB reported that <u>Ealing's</u> characterisation and housing design guidance work was almost complete, as was work on development capacity at Northolt.</p> <p>Claire Bradley (CB) reported that <u>Brent</u> expected to go out to consultation on their draft Neasden Stations Growth Area Masterplan later in the year.</p> <p>NL reported that the joint <u>Barnet/Harrow</u> draft supplementary planning document on the Edgware growth was out to consultation.</p> <p>David Hughes (DH) reported that <u>Harrow's</u> characterisation and tall buildings study was now in draft and should be finished by the end of March. Although there was a need to look at how it would operate in light of the ministerial direction to the Mayor to change London Plan policy on tall buildings. Work on small sites was progressing well, but there might be a need to roll the funding over to the next financial year.</p> <p>David Dewar (DD) said that <u>Hounslow</u> had secured a Public Practice secondee to support their work. Allies and Morrison had been working on character and design to underpin development of a design code and their work had been of high quality. Work was also underway on a site intensification tool.</p>	<p>ABP</p> <p>ABP</p>



<p>David Woodward (DW) said that Allies and Morrison were working on their small sites and had also been very good. Work on a characterisation study was under way.</p> <p>It was <u>agreed</u> that given the fact that Allies and Morrison had done work for a number of West London boroughs it would be worth inviting them to a future meeting of the Group, once the various studies had concluded.</p> <p><b>c) Other Mayoral work</b></p> <p>ABP reported that the Mayor had commissioned Arup to look at the post-pandemic future of the Central Activities Zone. This had identified the potential for more offices in outer London at key public transport hubs. The GLA was also working on infrastructure delivery.</p> <p>Jo Vos (JV) said that TfL had developed a range of post-pandemic scenarios. Their “hybrid” scenario, considered to be the most likely, envisaged more car use and more congestion, with public transport not reaching 2916 levels of usage until 2030.</p>	<p><b>ABP</b></p>
<p><b>4. Sub-regional planning</b></p> <p><b>a) Joint Evidence Base: Current work</b></p> <p><b>Strategic Infrastructure Delivery Plan:</b> SC said that the draft report had been circulated and comments had been received from most boroughs. These had raised a large number of detailed points, but a key question raised was how to prioritise across different infrastructure types.</p> <p>Rebecca Yee (RY) said the report could say more about 5G and potential digital infrastructure needs resulting from changing working patterns in the wake of the pandemic. SB noted that the West London Alliance was doing work on digital infrastructure delivery. He also noted how difficult it was to engage with the utilities on strategic planning. SC added that broadband was hard to plan for, particularly at individual borough level. 5G and broadband raised different issues, and the former might have little planning involvement and little need for public sector encouragement. He said he would welcome any suggestions about what else the report might say on these issues. RY noted that Hammersmith and Fulham were considering a workshop in these issues and would consider whether to link this to the SIDP work.</p> <p>DH said that one way of addressing the prioritisation issue might be to have some narrative about the scores for different infrastructure types and projects. Explaining the factors influencing the prioritisation could help boroughs looking across infrastructure types and take decisions locally.</p> <p>SC said that the next step would be to have a meeting of the project steering group to discuss the comments made and agree a timetable for completion of the project.</p> <p><b>Proposed West London Town Centre Commercial, Business and Service study:</b> The Group considered a revised draft specification for a two-stage study. The first stage might cost around £40-50,000. All boroughs continued to be interested in proceeding and it was agreed that ABP would circulate a pro forma asking boroughs about the town centre-related data they held which could be drawn on in a study of this kind without the need for a lot of costly original research work.</p> <p><b>Affordable workspace:</b> Comments on the draft report had been given to the consultants and a final report was now awaited. Thought could be given to further work on the subject once this commission had concluded.</p>	<p><b>SC/ABP</b></p> <p><b>ABP</b></p>

**b) Improving community engagement**

It was agreed that a special meeting dedicated to this subject would be worthwhile.

**ABP**

**c) Tall buildings**

The Group considered whether there was scope for some West London-specific work on tall buildings in light of the changes to London Plan policy directed by the Secretary of State. It was agreed that this was a topic that might usefully be discussed after the work being done on the subject for a number of boroughs by Allies and Morrison had been completed.

**ABP**

**d) Waste**

It was agreed to keep the need to revisit the West London Waste Plan under review, particularly given the imminence of London Plan publication.

**e) West London Orbital**

ABP noted that there had been a briefing on the work on the WLO to date on 20<sup>th</sup> January. This had included reporting back on the results of the Economic Benefits study prepared by Steer Group.

The work on potential service levels commissioned from Network Rail had shown that the 8 train per hour service level that had been proposed to date was probably not deliverable without substantial additional infrastructure, which could make the project undeliverable. The next stage of work would explore alternative service specifications that maximise the WLO benefits that can be achieved and are deliverable without excessive cost.

Work on the project was continuing despite Transport for London's current financial issues, in part because the WLA was able to provide funding from resources secured through the Strategic Investment Pot. Given the situation and the critical importance of the next stage of work it was proposed that SIP spending would be reprofiled, with funding for the next stage of technical work brought forward and that for borough masterplanning slipped until later in the year.

A report on the proposed funding arrangements and to establish project governance structures reflecting the joint nature of the scheme would be put to the West London Economic Prosperity Board meeting on 17<sup>th</sup> February.

**f) Heathrow Strategic Planning Group**

Michael Thornton (MT) reported that the HSPG member authorities had agreed that the Group should remain in being and had decided on future working arrangements with its work being led by MT and Mark Frost. The priority focus of this work would be post-pandemic economic recovery and surface access to the airport. The subject-specific sub-groups were being revived, including those dealing with spatial planning, environment and noise.

On economic issues, the Group would be revisiting its Economic Development Action Plan, with a view to identifying actions over a 6 month-5 year timescale, rather than one based on airport expansion. It was hoped to have an action plan by April. Work on sustainable surface access would also restart.

Heathrow Airport Ltd was likely to be working on how it would address net zero carbon with a view to publishing something at the end of the year. This was likely to set objectives and identify

the infrastructure required.

SB noted that the work of the HSPG highlighted the value of collaborative cross-boundary working and highlighted Heathrow's decision to withdraw funding for subsidised public transport around the airport. MT said that the impact of this step was mostly felt outside London of the reported that Heathrow Airport were fairly confident of success in their appeal to the Supreme Court on the validity of the Airport National Policy Statement, but that even if they were successful the matter would be back with the Government to decide on what to do. They were concerned about the likely situation at the end of the furlough period, as there had been no uplift in business during the summer.

The HSPG was continuing work on surface access, with a view to producing a strategy that looked at what could be delivered in a two runway future which took account both of the impacts of the pandemic and the recovery phase and the need to reduce private car use.

The Government had published a response to the consultation they had held on freeports. The Government was clearly committed to the concept There was speculation about potential bidders for freeport status; it was not clear whether Heathrow would bid or not.

HSPG would be submitting a response to "Planning for the Future" focussing particularly on sub-regional strategic planning options.

The Group's future work programme would depend on the outcome of the Supreme Court case. It was likely that its members would be consulted about potential options in time for a decision to be taken in February 2021 that could be implemented in the following financial year.

## 5. Borough and Other Authorities' Updates

Barnet would submit their plan for examination in the summer – this had been delayed by the need to observe pre-Mayoral election purdah requirements.

Brent were working on main modifications for submission to their examination inspector.

Ealing had postponed their regulation 18 consultation until the autumn, but were considering an informal issues and options consultation in the spring.

Hammersmith and Fulham had decided to wait to see what action the Government took on the "Planning for the Future" white paper proposals before deciding on their local plan timetable. They were doing further work on affordable workspace, looking at review mechanisms for financial contributions with consultants commissioned to work up a formula. SB asked if this work could be shared

Harrow were likely to conduct a broad issues and options consultation in summer 2021.

Hillingdon had had a change of political leadership. A report on local plan review was being put to Cabinet in March with a view to producing a plan in time for the Government's proposed 2024 deadline.

Hounslow had submitted their Great West Corridor/West of Borough draft plans for examination in December 2020. They had been notified of the inspectors who would be conducting the examination, but no further details about how it would be conducted as yet.

OPDC: The Corporation's Board would agree proposed plan modifications in early March with a

view to going out to consultation in the summer.	
	<b>PL</b>
<b>6. Any other business</b>  <b>Strategic Flood Risk Assessment:</b> CB said that the current arrangement with Metys to host the SFRA would come to an end in April. Renewing the arrangement would cost each borough £500 each. It was <u>agreed</u> to proceed on this basis and that Brent should proceed and bill boroughs accordingly.	<b>CB/All</b>

Date of next meeting: 13<sup>th</sup> May 2021

## West London Alliance

### Planning Policy Officers' Group

#### meeting notes of 13<sup>th</sup> May 2021 (held remotely) draft

**Present:** Steve Barton (chairing, Ealing); Nick Lynch (Barnet); Paul Lewin (Brent); Brianna Stolper, Ian Weake (Ealing); Sarah Dixey, Janda Thajinder, Rebecca Yee (Hammersmith and Fulham); David Hughes (Harrow); Julia Johnson (Hillingdon); Duncan McKane (Hounslow); Michael Thornton (Heathrow Strategic Planning Group); Katherine Pelton (Transport for London); Emma Beal (West London Waste), Andrew Barry-Purcell (WLA).

**Apologies:** Tom Campbell (Hillingdon), Danalee Edmund (Hounslow), Alison Bradshaw (TfL).

ITEMS / ACTIONS	LEAD
<p><b>1. Chair's welcome and previous notes</b></p> <p>Steve Barton (SB) welcomed members of the Group. The note of the previous meeting, on 13 May 2021 was approved.</p>	
<p><b>2. National Planning</b></p> <p><b>a) Planning Bill</b></p> <p>Andrew Barry-Purcell (ABP) noted that a Planning Bill had been announced in the Queen's Speech on 11<sup>th</sup> May. SB said that much would depend on the detail brought forward to flesh out the principles that had been announced so far on issues like the proposed infrastructure levy. The Group might be in a good position to provide briefings on technical issues. It would be important to keep the position under review so the implications for timing of local plan work could be understood. He noted that there was still no detail about how strategic planning would be dealt with – the originally proposed white paper on evolution had been replaced by one on "levelling-up". If this position persisted it was likely boroughs would be left to pick up strategic issues like Heathrow themselves. This might require greater West London alignment on spatial planning, picking up issues like infrastructure. The evidence base work overseen by the Group could provide a valuable foundation.</p> <p>Emma Beal (EB) said that she had been asked to engage with Government about waste reforms and agreed there was scope for work at sub-regional level. Paul Lewin (PL) said that it was clear from what was being said by the GLA that they had no appetite for a review of the London Plan. ABP said that there might be scope for looking at providing resources like training at sub-regional level.</p> <p>It was agreed to return to the issue when the timescale for the Bill became clearer.</p> <p><b>b) National Housing Need Methodology</b></p> <p>The Group discussed whether it was worth making representations to national government about the deliverability of the housing need figures arising from the national methodology. SB said that these were so manifestly undeliverable there was little to be gained – and it was unlikely that Government would be responsive. ABP asked whether there was support to refresh the West London Strategic Housing Market Assessment. Both Julia Johnson (JJ) and David Hughes</p>	ABP

<p>(DH) agreed it was worth considering and ABP agreed to discuss the issue further with Rachel Ormerod (WLA Head of Housing) and Sam Cuthbert (Ealing)</p> <p><b>c) MHCLG “Right to Regenerate” Consultation</b></p> <p>It was noted that the WLA had submitted a response to the MHCLG consultation on the “Right to Regenerate” – which had been circulated.</p>	<p><b>ABP</b></p>
<p><b>3. Regional Planning</b></p> <p><b>a) Mayor’s Homebuilding Capacity Fund Projects- Progress</b></p> <p>SB reported that <u>Ealing’s</u> work on development capacity at Northolt was proceeding well. Their characterisation study report was being finalised – the work by Allies and Morrison had been of high quality. .</p> <p>PB reported that the draft Neasden Stations Growth Area Masterplan was being reported to <u>Brent’s</u> cabinet for approval in May/June for consultation thereafter.</p> <p>NL reported that it was expected that the joint <u>Barnet/Harrow</u> draft supplementary planning document on the Edgware growth area would be adopted in June.</p> <p>David Hughes (DH) reported that <u>Harrow’s</u> characterisation and tall buildings study was being reviewed, particularly as regards tall building policy. Small sites capacity work was nearing completion; that on a Design Code was likely to conclude by the end of the year.</p> <p>Sarah Dixey said that Allies and Morrison had completed work for <u>Hammersmith and Fulham</u> on characterisation, and small sites capacity, and were finalising work on a design code. They were likely to publish bite-size codes for development management purposes. SB asked if these could be shared when published</p> <p>Duncan McKane (DM) said that <u>Hounslow’s</u> Character and Context supplementary planning document had been subject to one round of consultation and there had been a further consultation meeting the night before. The intention was to consult further on the SPD in the autumn.</p> <p>It was noted that at a previous meeting it had been agreed that Allies and Morrison should be invited to the July meeting of the Group.</p> <p><b>b) Issues with GLA Datahub</b></p> <p>ABP reported that concerns had been expressed at the WLA Chief Planner’s Group about how the GLA was handling the transition from the London Development Database to the GLA Datahub. SB said that the gap between switching off the LDD and turning on the Datahub had led to a large backlog of data to be uploaded. Ealing had met with Peter Kemp of the GLA a fortnight earlier to raise concerns about the use of spreadsheets to collect the data, which was proving impracticable. Ian Weake added that there was already a backlog of data to be entered when the LDD was shut off in June 2020 and this had worsened in the intervening period. The new system depended on using spreadsheets to upload data, but this was proving impractical given the volumes of applications involved . Each residential unit was recorded separately , and there was</p>	<p><b>ABP</b></p>

no link between tabs meaning that it was not certain that numbers would tally. The capacity to check on related schemes had been lost, meaning that it couldn't be checked to see whether schemes had been superseded until the new system was fully operational. JJ said that Hillingdon had had a similar meeting. The GLA were proposing to employ students to help, although it seemed unlikely this would address the problem. Obtaining reliable data to respond to queries (about housing delivery by ward, for example) was proving difficult. PL said Brent had had a similar meeting.

SB suggested that it would be worth seeking a West London meeting with the GLA to discuss the issues raised and potential solutions.

#### c) London Plan Policy D12: Fire Safety

DH said that concerns had arisen at Harrow about the operation of London Plan policies D12 and D5. D12A dealt with all development and did not require submission of documentation; D12B dealt with major development and required submission of a fire statement. However draft guidance being prepared by the GLA suggested production of fire safety strategies for both categories - although it was not clear what was to be done with them or by whom. Application to "major" developments contrasted with the Government's "Gateway One" approach, which identified priority buildings by reference primarily to building height. The GLA's approach appeared not to take account of building regulation requirements. It was proving difficult to provide development management staff with useful advice. Policy B5, on inclusive design, included requirements about emergency escape requirements – but there was no guidance or relevant standards. It would be important to ensure building control input.

It was agreed that an email should be sent to Lucinda Turner, Assistant Director raising the Group's concerns about the policies and how they should be applied. The Datahub issue could be addressed at the same time.

ABP

### 4. Sub-regional planning

#### a) Waste

The meeting was addressed by Emma Beal, Managing Director of the West London Waste Authority (WLWA). Although the WLWA did not cover Barnet, it worked at West London level with Environment Directors and coordinated the Climate Emergency Officers' Group and had a good fit with Barnet and Hammersmith and Fulham on these areas of work. The WLWA was working on a Joint Waste Strategy, development of which was complicated by the pace of change in the area, including the Environment Bill. It would cover:

- People
- Infrastructure
- Places

With an emphasis on bringing the community on to meeting objectives. There was a particular emphasis now on infrastructure – both delivering more and making best use of what already existed. The intention was to provide opportunities covering a range of materials – which could not be done in each West London borough, but could across the sub-region. This work was being informed by data about waste flows, but there was a particular focus on encouraging a circular economy, especially for textiles and plastics. Individual boroughs were taking on particular themes, including transforming existing waste handling sites and doubling the extent of recycling infrastructure.

SB asked how useful the current West London Waste Plan was and about plans for the existing



portfolio of sites. EB said that West London was comparatively well-placed, having protected sites in ways other parts of London had not. There were pressures on sites – and the extension of circular economy principles meant that enough space had to be provided in individual housing developments as well.

Katherine Pelton (KP) asked about movement of waste. EB said that most West London waste was transported by rail through two transfer stations. Recycling collected by boroughs on the other hand tended to be transported by road. Over the next 20 years it was intended to move towards 50% recycling rates and this would mean shared sites, reducing vehicle movement numbers. IW asked about the composition of the waste streams being managed and whether these were expected to change. EB replied that the biggest category was food waste. The extended producer obligation should reduce the amount of packaging, which should free up space to handle other materials. Textiles in particular were responsible for high carbon emissions. She offered another session looking specifically at waste composition.

SB noted that the Group had been keeping the need to refresh the WLWP under review. EB advised that it would be best to wait for new legislation to be put in place and to revisit the issue then. In the meantime the WLWA would like to understand likely sub-regional housing growth.

SB suggested that the WLWA send a representative to meetings of the Group. It was important to understand the need for waste sites, particularly as the West London land market was tending to squeeze out lower value uses. It would also be important to flag the point at which the WLWP should be reviewed. EB noted that waste uses would increasingly become industrial through the move to a circular economy.

SB asked about contingency planning for expansion of Heathrow. EB said this was an issue that would need more detailed discussion, but that as a private business the airport could contract with whoever it wished to manage its waste and any work with them would have to be on a voluntary basis. Michael Thornton said this was a particular issue for construction waste, especially for off-site works like road tunnels. Expansion would have involved loss of a waste incinerator at Slough. EB noted that construction waste was a particular priority for national government's circular economy work.

EB noted that a particular issue that needed to be addressed was recycling of electrical goods in town centres. There was a consultation on return deposit facilities – reverse vending cabins to be sited on high street, proposed to be installed as permitted development. She would circulate the consultation document on the issue and encouraged boroughs to respond.

EB/ABP

## **b) Establishing a Climate Change/Biodiversity Working Group**

ABP reported that the Chief Planners' group had agreed that a working group should be set up to deal with climate change, biodiversity and related issues. He asked for a volunteer from each borough; once the membership had been filled, he would organise a meeting.

ALL

## **c) Pandemic: West London Recovery Work**

ABP reported on work being done to update the West London Build and Recover Plan, including commissioning Oxford Economics to update their work on the potential impact of the pandemic on West London published last April.



#### d) Joint Evidence Base: Current work

**Strategic Infrastructure Delivery Plan:** ABP reported that a final draft, taking account of comments made on the first draft, was awaited.

**Proposed West London Town Centre Commercial, Business and Service study:** ABP thanked boroughs for sending information about the information they held relating to town centres. He would analyse the response and then arrange a sub-group meeting to agree steps to take the proposed study forward.

**Affordable workspace:** A final report had now been received and would be published shortly.

#### e) West London Orbital

ABP reported that work on the WLO was proceeding well; initial results from work by Network Rail on potential service levels were encouraging and work was being commissioned on engineering and design on key parts of the route including Hendon, Cricklewood and Neasden stations and Old Oak Common Lane Station/Acton Wells Junction. Given that the pace of the project was picking up more regular engagement with planning authorities along the route would be valuable.

The West London Economic Prosperity Board had agreed governance and funding arrangements at its February meeting.

#### f) Heathrow Strategic Planning Group

MT said that the question of Heathrow expansion was now a matter for the Government. The Queen's Speech had said little about aviation, but there might be more on decarbonisation of the sector in the summer in time for the COP26 conference. The position was that the Supreme Court had reinstated the Airport National Policy Statement.

The Heathrow Strategic Planning Group had re-established its Spatial Planning Group which would deal, among other things, with the pressures for release sites that had been safeguarded for expansion. The Group was also focussing on pandemic recovery, with an Economic Development Vision and Action Plan about to be published, which would be discussed at a mini-summit meeting which would be attended by Lord Blunkett.

The aviation sector was awaiting Government decisions on removal of pandemic restrictions, but the impact of the pandemic was likely to be longer and deeper than originally envisaged.

#### 5. Borough and Other Authorities' Updates

Barnet intended to submit their draft plan – with reduced, London Plan-based housing targets - for examination in the summer. Consideration was being given to handling consultation arrangements should pandemic restrictions still be in place.

Brent were now very close to issuing local plan main modifications, working to resolve issues raised by their examination inspector. PL noted that Highways England had been very slow to respond in agreeing a statement of common ground. They were also reviewing what should be done with article 4 directions in light of recent changes to the introduction of the Class E use class – in particular in light of indications about the likelihood of ministerial intervention. He said that the Harlesden neighbourhood forum had recently had their designation renewed. Kilburn's

designation ran out next year; it had made no progress on a neighbourhood plan.

Ealing had a new Leader of the Council, Councillor Peter Mason, who was a planner by profession and was emphasising public participation in planning. They were envisaging a high level options consultation in the summer with a view to regulation 18 consultation in October. No Acton neighbourhood plan had yet emerged.

Hammersmith and Fulham intended to consult on supplementary planning documents covering railway arches, Hammersmith town centre (with a particular design emphasis) and affordable workspace viability in late September.

Harrow were likely to conduct a broad issues and options consultation in autumn 2021. There had been a Full Council motion on tall buildings from the Council's opposition group which had been defeated but was having some wider repercussions.

Hounslow had submitted their Great West Corridor/West of Borough draft plans for examination in December 2020. They too were waiting for Highways England to respond to requests. They would consult on a Character/Design SPD in the summer

Date of next meeting: 22<sup>nd</sup> July 2021

## West London Alliance

### Planning Policy Officers' Group

#### meeting notes of 22 July 2021 (held remotely) draft

**Present:** Steve Barton (chairing, Ealing); Nick Lynch (Barnet); Paul Lewin (Brent); Sam Cuthbert, Brianna Stolper (Ealing); Sarah Dixey, Rebecca Yee (Hammersmith and Fulham); David Hughes (Harrow); Tom Campbell (Hillingdon); Christopher Kirk (Hounslow); Michael Thornton (Heathrow Strategic Planning Group); Monika Jain (Transport for London); Peter Tilston (West London Waste), Andrew Barry-Pursell (WLA).

**Apologies:** Alison Bradshaw (TfL); Emma Beal (West London Waste Authority).

ITEMS / ACTIONS	LEAD
<p><b>1. Chair's welcome and previous notes</b></p> <p>Steve Barton (SB) welcomed members of the Group. The note of the previous meeting, on 13<sup>th</sup> May was approved, subject to correcting the date of the previous meeting.</p>	
<p><b>2. West London design and characterisation work: presentation from Allies and Morrison</b></p> <p>The meeting received a presentation from Louise Mansfield (LM) from Allies and Morrison about the work they had been doing for West London boroughs on design and characterisation – four studies funded by the Mayor's Homebuilding Capacity Fund and two (for Barnet and Hillingdon) done less recently. Her principal focus was on the most recent studies as these took account of policies in the new London Plan.</p> <p>These studies were underpinned by the need to intensify development to boost housing supply and to do so in accordance with the principles of good growth, led by local character and recognising the importance of the built environment in contributing to health and wellbeing – and in helping to address the climate change emergency.</p> <p>The various studies had covered all or some of: local character, the potential of small sites, scope for tall buildings and design coding. They had been informed by the emerging London Plan and its emphasis on making better use of land in ways informed by local character.</p> <p>The starting point for these studies was the historic evolution of each area and an account of the drivers of local change. They were based on GIS mapping – physical, social and functional. The work had gone on to deal with the building types in an area, residential and non-residential. A profile and performance criteria for each type of place was then developed, with good examples of intensification suitable for each.</p> <p>The studies were intended to provide support for an informed approach to intensification. For small sites they had used the London Plan development criteria and a number of other variables including local strategic priorities for regeneration, access to green space and affordability. Areas identified as suitable having regard to two of the London Plan criteria and one of the variables were mapped at borough level with more detailed work on neighbourhood effects.</p> <p>There were some thematic issues that applied across boroughs, such as shopping parades, the Thames and transport corridors that crossed administrative boundaries. The benefits of the approach taken had included scope for reducing environmental impacts (and pressure on Green</p>	

Belt land), affordability, access to local community facilities and resilience.

On tall buildings, the intention was to identify the scope for delivering more new homes in buildings that are designed and built well. The approach had been informed by London Plan policy as amended by direction of the Secretary of State – this required boroughs to decide on their own definition of what constitutes a tall building and identify locations suitable for them. The studies had sought to help identify suitable locations and map them, establishing prevailing building heights and drawing on this providing a policy framework. These took account of local sensitivities such as heritage and controlled airspace and particular suitability criteria, such as town centre locations. These considerations were taken together to indicate broad locations suitable for tall buildings and to highlight design factors relevant in each case.

Turning to design codes, she said the approach could deal with broader use types or at plot/small site levels. Area studies and masterplans could have particular benefits for town centres and for testing higher level policy aspirations and themes (such as delivering more homes, while at the same time addressing wider objectives like accessibility).

Effective engagement was key, and was emphasised in the draft National Model Design Code. It could be complicated, particularly in dealing with less tangible concepts. Engagement across borough boundaries could also be important.

She noted that there could be differences between inner and outer boroughs, particularly given differences in property and development values and the quality of local environments. But the overall objectives were common – ensuring balanced intensification and a range of options for local decision-makers to deliver good growth.

Allies and Morrison had submitted a response to “Planning for the Future” which had expressed concern about the applicability of the proposed growth/renewal/protect designation to circumstances in the ground in London – where most places would sit in the “renewal” zones. The approach to zoning proposed would be a blunt tool.

Steve Barton (SB) thanked Louise for her presentation and the common issues she across West London boroughs she had identified. The work had shown the importance of character to planning policy.

Nick Lynch (NL) asked about refreshing studies. LM noted that the work done for Hounslow had been a refresh of earlier work. Local people had shown their appreciation for the original work and the understanding it had given about local places. Sam Cuthbert (SC) asked whether the recently published updated National Planning Policy Framework was any clearer about the formal status of design codes. LM replied that there was still some ambiguity, but the design code pilot process might give some pointers. Christopher Kirk (CK) said that it had been encouraging to see the level of public interest in engagement around Hounslow’s Character and Design Study supplementary planning document. SB said that he was being encouraged to adopt the study carried out for Ealing both as part of the local plan evidence base and an SPD.

David Hughes (DH) said that the work done for Harrow on tall buildings had been presented to elected members and they were now considering how best to take the issue forward in their local plan review. It would particularly help with practical implementation of London Plan policy on tall buildings. SB said that these issues would be even more difficult to address with the “as of right” approach suggested in “Planning for the Future”. He thanked LM for her very valuable presentation.

### 3. National Planning

#### a) Planning Bill

SB said that it now appeared that a report on the responses to the consultation on “Planning for the Future” would be published in the autumn with a bill presented to Parliament as soon as possible thereafter. During his recent speech to the Local Government Association annual conference, the Secretary of State had appeared to take a less radical approach than the white paper had suggested, presenting the proposed reforms as improvements to the system rather than “rip it up and start again”.

Andrew Barry-Purcell (ABP) reported that he had been invited to take part in an exercise conducted by consultants commissioned by MHCLG to “map” the planning system as it worked in practice, focussing on local plans. This had not been how the session had been billed and suggested a disturbing lack of understanding by a government department of a system for which they had formal responsibility and to which they were proposing major changes.

#### b) Other national planning issues

It was noted that a revised NPPF and finalised National Model Design Code had been published by MHCLG. It was noted that Government had made clear that the Code was intended as a guide to development of local codes and to be used in decision-making in the absence of these – and not as anything more prescriptive.

### 4. Regional Planning

#### a) Mayor’s Homebuilding Capacity Fund Projects- Progress

SB reported that Ealing’s work on development capacity at Northolt was proceeding well.

Paul Lewin (PL) reported that Brent’s draft Neasden Stations Growth Area Masterplan was currently out for consultation, with a view to adoption around Christmas.

NL reported that the joint Barnet/Harrow draft supplementary planning document on the Edgware growth area had now been adopted.

DH reported that Harrow’s small sites capacity work was nearing completion; that on a Design Code was being finalised with a view to adoption as a supplementary planning document – a draft would be completed shortly.

Sarah Dixey (SD) said that Allies and Morrison had completed their work for Hammersmith and Fulham. It would provide a valuable evidence base. They would be updating design code.

CK said that Hounslow’s Character and Context supplementary planning document would be issued for further public consultation in the autumn.

#### b) Issues with GLA Datahub

SB said that issues with the Datahub remained. It was clear that there had been inadequate consultation with users, and it was proving difficult to address the problems that had emerged. Ealing had employed interns to address the reporting backlog, but this was likely to take months.

<p>TC noted that the system that was supposed to automatically input backlogged data was not working. Housing completion data was in a poor state and may well not be complete, which meant that it all had to be reviewed. DH said Harrow had had to fall back to an in-house system. CK had the same concerns – a patch issued by the GLA was a small comfort. He noted that the GLA were seeking more time to submit housing completion data to Government.</p> <p>TC said the GLA thought they had solved the problem and had offered staff resources. The upshot was that boroughs were having to dedicate time to getting the system back to where it had been two years before. The GLA should be urged to focus on completions data and forget other functionality until this was resolved – it was important to ensure this data was accurate in order to avoid problems later.</p> <p>It was <u>agreed</u> that an email should be sent to Lucinda Turner at the GLA urging that there should be a focus on immediate issues and seeking an assurance about the reliability of the system going forward. It should point out the importance of ensuring that further work on the Datahub should be based on the principles of full consultation with boroughs and agreement not to proceed without their agreement. It should be pointed out that merely hiring additional staff was not an acceptable substitute for sorting out the system – they would tend to be unqualified, and the cost would represent a diversion from boroughs’ own priorities.</p> <p><b>c) London Plan Policy D12: Fire Safety</b></p> <p>Lucinda Turner’s response to the email sent to her regarding application of the London Plan fire safety policies alongside the Government’s Planning Gateway 1 - which stated the two systems would have to operate in parallel – was noted.</p> <p>It was noted that an email had be sent to MHCLG raising the Group’s continuing concerns about having to operate two parallel but slightly different systems in London – and suggesting that the London Plan policies might not be said to have been superseded by events.</p>	<p><b>ABP</b></p>
<p><b>5. Sub-regional planning</b></p> <p><b>a) Waste</b></p> <p>Peter Tilson (PT) said that the West London Waste Authority was looking to double its recycling infrastructure in order to handle an increased volume and greater range of materials, in response to the Environment Bill. It was looking to increase provision in areas likely to see more development. They were at an early stage of looking at they types of site and the collection and storage issues involved. They were also interested in ensuring new residential developments allowed enough space for waste storage and collection.</p> <p>SB said that the Group was glad to help with this work, for example in collecting information from boroughs.</p> <p><b>b) Highways England</b></p> <p>It was <u>agreed</u> that an approach should be made to Highways England regarding their dilatoriness in responding to requests from boroughs, particularly during local plan examinations and seeking a meeting with them to discuss the issue.</p> <p><b>c) Pandemic: West London Recovery Work</b></p> <p>ABP reported on work being done to update the West London Build and Recover Plan, noting</p>	<p><b>ABP</b></p>

that the report from Oxford Economics updating their 2020 work on the potential impact of the pandemic on West London had been published and circulated.

#### d) Joint Evidence Base: Current work

**Strategic Infrastructure Delivery Plan:** ABP reported that a final draft, taking account of comments made on the first draft, had been received and was being reviewed.

**Proposed West London Town Centre Commercial, Business and Service study:** ABP reported that he would be starting the procurement process shortly

**Affordable workspace:** A final report had now been received and was being published on the WLA website. He agreed to circulate the link when this had been done.

ABP

**Employment Land Assessment:** SC noted that Ealing were considering an update of the Employment Land Assessment as part of the evidence base for their local plan. He asked whether other boroughs were interested in joining. It was agreed that any borough interested should let SC know as soon as possible.

#### e) West London Orbital

ABP reported that work on the WLO was continuing. Atkins had now been commissioned to work on engineering and design on key parts of the route including Hendon, Cricklewood and Neasden stations and Old Oak Common Lane Station/Acton Wells Junction. He would keep boroughs affected informed of progress.

#### f) Heathrow Strategic Planning Group

MT said that HSPG had updated its Economic Development Vision and Action Plan, which was available on the HSPG website. Work would then start on reviewing the Joint Spatial Planning Framework to adapt it for a two runway future. This work was taking account of the Pandemic but also wider issues including net zero carbon, the importance of Heathrow as a UK gateway and its importance as such to the Government's levelling up agenda, innovation and sustainable energy solutions. He noted that Heathrow were being more responsive than hitherto, engaging on issues like decarbonisation. However there were fewer resources to deal with challenges like improving surface access.

### 6. Borough and Other Authorities' Updates

Barnet was currently out to regulation 18 consultation, with a closing date for comments of 9<sup>th</sup> August. They had used a video to support the consultation, which was available on their website. There had been a referendum on the West Finchley neighbourhood plan, which resulted in a "yes" vote.

Brent was consulting on main modifications to their local plan, with a closing date of 19<sup>th</sup> August. They hoped to be able to go to full council for adoption in November.

Ealing had revised their local plan timetable in light of the recent change of leadership. They intended to carry out a high level consultation in the autumn with a view to starting the formal process in late May 2022, with submission twelve months after that

Hammersmith and Fulham intended to take supplementary planning documents covering railway

<p>arches, Hammersmith town centre (with a particular design emphasis) and affordable workspace viability to committee in October. They were working on compiling completions data.</p> <p><u>Harrow</u> were likely to conduct a broad issues and options consultation in autumn 2021 and after that to follow a timetable similar to Ealing's.</p> <p><u>Hillingdon</u> now had a budget to carry out their local plan review, which was now starting. He asked whether boroughs were taking account of vacant housing units returned to use in establishing a five year housing land supply. PL said that Brent had been told to remove them from their housing trajectory by their EiP inspector, reflecting the fact that reference to them had been removed from the National Planning Practice Guidance.</p> <p><u>Hounslow</u> were waiting for examination dates for their Great West Corridor/West of Borough draft plans, anticipated to start in late autumn and conclude before the end of the year. They had now resolved their issue with Highways England. They would consult on a Character/Design SPD in the autumn.</p>	
<p><b>7. Any Other Business</b></p> <p><b>a) Next Meeting</b></p> <p>It was <u>agreed</u> that if possible, the next meeting of the Group (28<sup>th</sup> October) would be held on a hybrid basis.</p> <p><b>b) Article 4 directions</b></p> <p>PL asked whether boroughs were pursuing article 4 directions. SB said that Ealing were taking one forward on houses in multiple occupation and noted that both Westminster and Kensington and Chelsea were doing likewise. DH said that Harrow were working on an office to residential direction and preparing an evidence base for one for strategic industrial land, taking account of national guidance.</p>	<p><b>ABP</b></p>

Date of next meeting: 28<sup>th</sup> October 2021



## West London Alliance

### Planning Policy Officers' Group

#### meeting notes of 28<sup>th</sup> October 2021 (held remotely) draft

**Present:** Paul Lewin (chairing, Brent); Ngaire Thomson (Barnet); Brianna Stolper (Ealing); Sarah Dixey, Rebecca Yee (Hammersmith and Fulham); David Hughes (Harrow); Tom Campbell (Hillingdon); Lauren Lavinieri (Old Oak/Park Royal Development Corporation); Michael Thornton (Heathrow Strategic Planning Group); Andrew Barry-Purcell (WLA).

**Apologies:** Steve Barton (Ealing); Nick Lynch (Barnet); David Gawthorpe (Hammersmith and Fulham); Chris Kirk (Hounslow); Alison Bradshaw (TfL); Emma Beal (West London Waste Authority).

ITEMS / ACTIONS	LEAD
<p><b>1. Chair's welcome and previous notes</b></p> <p>Paul Lewin (PL) welcomed members of the Group. The note of the previous meeting, on 22 July was approved.</p> <p><b>Matters arising:</b> Ngaire Thomson (NT) said that Barnet had had a meeting with what was now National Highways with regard to Barnet's local plan. She said they had been apologetic about the delays in responding to communications from boroughs and had suggested these were due to a staff member who had subsequently left. Andrew Barry-Purcell (ABP) noted that he had written to National Highways suggesting they send a representative to a future meeting of the Group as a way of discussing ways of being more proactive in identifying the issues likely to be of concern to them and to agree a protocol for working together in the future.</p>	
<p><b>2. National Planning</b></p> <p><b>a) Planning Bill</b></p> <p>ABP said that it was now unclear when more might be heard about the Government's intentions with regard to reform of the planning system, although it was clear that the new Secretary of State was taking his time to review the proposals and responses to the "Planning for the Future" white paper.</p> <p><b>b) Other national planning issues</b></p> <p>ABP noted that the Office for Zero Emission Vehicles had issued a consultation on planning for electric vehicle infrastructure, suggesting a statutory duty for local authorities to plan for – and potentially provide – electric vehicle charging infrastructure. There was already a lot of work in this area going on in boroughs. It was agreed that this probably did not relate directly to land use planning, but that it would be useful to have this clarified. Tom Campbell (TC) said that beyond having supportive local plan policies there was little the planning system could do, but said there was a potential role for building control in ensuring provision, given their experience and role in the development process.</p> <p>It was <u>agreed</u> to respond to Government pointing out the extensive work already underway asking for clarification of the relationship between the proposals and the land use planning system and to welcome the potential role for building control services.</p>	ABP

<p>Michael Thornton (MT) asked about press speculation that the Government was considering setting national housing targets prioritising delivery in places identified as requiring “levelling up”. PL noted that authorities resistant to delivering housing were stepping back from planning for housing, but that nothing had been said formally.</p>	
<p><b>3. Regional Planning</b></p> <p><b>a) Mayor’s Homebuilding Capacity Fund Projects- Progress</b></p> <p>PL said that <u>Brent</u> had not made significant progress since the last meeting. Consultation on the draft Neasden Stations Growth Area supplementary planning document had been completed and the responses were being considered. Delays in the local plan examination process might delay final adoption, but progress was being made in completing the formal process.</p> <p>David Hughes (DH) said that <u>Harrow</u> were putting their draft Small Sites Design Code SPD to their Cabinet on 18<sup>th</sup> November for approval for public consultation – which would take place in December 2021-January 2022 with a view to final adoption in April 2022.</p> <p><b>b) London Plan Policy D12: Fire Safety/Issues with GLA Datahub</b></p> <p>ABP reported that the Chief Planners’ Group had considered the current position with regard to both the London Plan policies on fire safety and implementation of the London Datahub, and had agreed that a meeting should be sought with the GLA on both issues.</p> <p>PL said Brent had made some progress with regard to completions data, but that they had had to take the lead themselves. GLA staff tried to be helpful, but it seemed they were not receiving support they needed from more senior management. He agreed the matter was worth pursuing further. TC agreed – this year’s process had been very difficult and there was a need to escalate the issues with more senior GLA managers. The problems were having serious practical consequences, including difficulties in establishing five year housing land supplies and inaccurate data. Brianne Stolper (BS) said that Ealing had just completed compiling starts and completions, but that the process had been very difficult. Sarah Dixey (SD) said it was worth suggesting establishment of a joint steering group to iron out any issues before compilation of next year’s data. TC agreed as this would avoid boroughs speaking individually to the GLA about the same issues.</p> <p>It was <u>agreed</u> that a meeting should be sought with the GLA on these issues.</p> <p><b>c) Mayoral consultation on Urban Greening Factor</b></p> <p>It was noted that the GLA was consulting on draft supplementary guidance on application of London Plan policy G5 on urban greening.</p> <p>NT said that the draft said nothing about monitoring developers’ compliance with requirements or about maintenance or management. Barnet was using a policy hook in their local plan policy on net biodiversity gain for these purposes given the absence of a similar provision in the London Plan itself. MT agreed that monitoring and verifying urban greening and the carbon savings resulting were vital – without them the policy would be ineffective. PL said the guidance was fine in principle, but said nothing about monitoring or about how requirements could be formalised (eg by condition or through a planning obligation). There were also questions about how requirements could be enforced and the capacity of local planning authorities to implement the guidance.</p>	<p><b>ABP</b></p>

It was agreed that these points should be made to the GLA.

NT said that the GLA were also consulting on draft Sustainable Transport, Walking and Cycling supplementary planning guidance, which members of the Group might want to review.

#### **d) Key worker housing**

ABP said that the GLA's Public Land Team had recently held an event at which they had implied that draft guidance would be issued on securing intermediate housing for key workers. PL observed that Brent already had some provision of this kind.

#### **e) Centre for London Industrial Land Commission**

The Group considered the initial conclusions of the Centre for London's Industrial Land Commission. PL said that he had been a member of the Commission, which had had interesting discussions. The draft final report would be circulated among Commission members shortly – the hope was that it would be published before Christmas, with a launch event. He said it was clear that co-location had limited scope to deliver space on the scale required. The main thrust had to be to find the right kind of space in the places required and there needed to be recognition nationally of the need to guarantee land availability for uses other than housing. NT said this could be an opportunity to raise the issue of permitted development rights and PL said this would be picked up in the final report.

TC noted that there were signs of intensification-based proposals coming forward and that this would be likely to be picked up in any London Plan review – although the draft report seemed fairly dismissive about the contribution this could make. PL said this was not his experience in Brent, where there was more interest in self-storage space. TC said that much would depend on land values; if green belt land was released values would be expected to fall and the incentive for intensification would reduce.

NT said that Barnet had a number of small employment sites that were under pressure for release for housing. They were considering making an article 4 direction. PL said Brent had a number of article 4 directions out for consultation, and that they had not as yet heard anything in response from Government – so at this point it was not clear how the new National Planning Policy Framework guidance on use of directions would be applied. TC said that Hillingdon had had a response to their proposed Class E to residential direction asking for a Shape file of areas proposed to be covered and they were in touch with administrative staff at the Ministry of Housing, Communities and Local Government about other responses they had received. About 20 authorities were consulting on directions so MHCLG might be expected to have decided about what course to take.

SD asked whether the recent extensions to permitted development rights were being raised. PL said the inspectors carrying out the Brent examination had not come back on the issue, but it had affected policies on town centres, particularly non-retail uses in primary frontages. It would now be more difficult to show how sufficient industrial floorspace would be delivered to meet identified need.

### **4. Sub-regional planning**

#### **a) Waste**

ABP noted that the West London Waste Authority was considering making provision for a

planning post. He had also had approaches from consultants asking about the likely timing of work on a new West London Waste Plan.

PL said that it was probably time to start giving serious thought to revising the Waste Plan. BS said that although the Plan was becoming out of date, but that the process for revision was likely to be resource-intensive. She had project managed preparation of the current plan and that having someone in that role would be critical for any revision. The consultants – BPP – had been extremely helpful. She would be happy to give a presentation to the next meeting about what would be involved. NT added that Victoria Manning, who had managed preparation of the North London Waste Plan would also be glad to speak. It was agreed that this would be picked up at the next meeting.

BS/ABP

#### **b) Minerals Planning**

ABP said he had had an approach from a consultant asking about what action was being taken on a local aggregates assessment for West London. TC said that the London Aggregates Working Party now had a new chair and that the proposal was for a pan-London assessment to be carried out.

ABP

#### **c) Pandemic: West London Recovery Work**

ABP reported on work being done at West London level on recovery from the Pandemic. This included taking forward the next steps with the West London Build and Recover programme and work to develop the West London Innovation District concept. A West London Corporate Leaders' Group had been established under the aegis of West London Business; this had established a number of sub-groups dealing with particular issues – including net zero and infrastructure issues which were picking up on energy planning and mobility/transport/

#### **d) Joint Evidence Base: Current work**

**Strategic Infrastructure Delivery Plan:** ABP reported that a final draft, taking account of comments made on the first draft, had been received and was being reviewed. Rebecca Yee (RYO and TC asked for an opportunity to review the draft. It was agreed that any final comments would be sent to ABP by the end of the following week.

ABP

**Proposed West London Town Centre Commercial, Business and Service study:** ABP reported that the procurement process was underway.

**Affordable workspace:** The final report had now been published on the WLA website. A link had been circulated.

#### **e) West London Orbital**

ABP reported on progress. The current stage of work was due to be completed in December, when the decision would be taken whether to proceed to the next stage. So far no technical "showstoppers" had been identified. Further work was being commissioned on the scope for use of the Community Infrastructure Levy and planning obligations, to identify the scope for raising funding from these sources having regard to potential impacts on development viability and on other policy priorities. It would also examine in more detail the role the WLO could play in accelerating housing delivery. A "Strategic Narrative" document, giving an overview of the benefits of the WLO in delivering national, regional and local priorities in a clear and effective way, would be published shortly.

#### f) Heathrow Strategic Planning Group

MT said that the Secretary of State for Transport had recently written a letter indicating that a decision on review of the Airport National Policy Statement would be made in light of the responses to the “Jet Zero” consultation, probably in the first quarter of 2022. In the meantime the Department for Transport had announced the closure of the Independent Commission on Civil Aviation Noise and its role would be transferred to the Civil Aviation Authority.

As far as expansion of the airport was concerned, work on a development consent order was still paused, Heathrow was anticipating a return to pre-pandemic passenger numbers by 2027. Work had started in changes to airspace management that would enable a small increase (20,000pa) in air traffic movements, including easterly operations on the north runway. Heathrow Airport Ltd was looking to give a good account of itself at COP26. In the meantime other airports were making applications for growth.

The Heathrow Strategic Planning Group was continuing its work; it was doing a lot of work on decarbonisation and it was refreshing its Economic Development Vision and Action Plan. Consideration was also being given to next steps with the Joint Strategic Planning Framework. There were continuing discussions about governance and funding, but for the time being the HSPG had the resources it needed to continue. Its work would be around a two runway scenario for the foreseeable future.

#### 5. Borough and Other Authorities’ Updates

Barnet was preparing to submit its local plan for examination and for examination of its Community infrastructure proposals in November. They were not pursuing any article 4 directions for the time being.

Brent had experienced a delay in receiving the inspectors’ report on its local plan (because of the inspectors’ other examination commitments). They now hoped to have the local plan adopted at full council in February 2022. This delay had slowed progress with supplementary planning documents. The Kilburn Neighbourhood Forum was seeking redesignation.

Ealing was about to launch the first (informal and non-statutory) round of engagement on its local plan. It would take the form of a questionnaire on the “Give My View” platform. There would be other activities up to the start of the pre-election period. They hoped to carry out a regulation 18 consultation in early summer 2022.

Harrow were having discussions with elected members about a range of issues and intended to start the statutory process after the May 2022 elections. They were considering the position regarding article 4 directions.

Hammersmith and Fulham were progressing supplementary planning documents covering railway arches, Hammersmith town centre and affordable workspace viability, hoping to go out to public consultation in November for four weeks with a view to adoption in March 2022. They had not taken a decision on article 4 directions as yet.

Hillingdon had had to pause local plan work to focus on starts and completions data and article 4 directions. Once these were out of the way the intention was to develop the local plan evidence base. They had made enquiries of the GLA about their intentions regarding review of the London Plan – if this was taken forward they would follow the same timescale. TC asked whether other boroughs had issues calls for sites and whether there was any appetite to look at digitalising the strategic housing land availability assessment process of the GLA decided not to do it themselves; Ealing and Harrow expressed interest; given the stage they had reached with their local plan

<p>Brent was not. TC said he would feed back on the results of discussions with the GLA.</p> <p><u>OPDC</u>: They had issued main modifications to their local plan in July and had sent comments received to the Inspector, who had just issued a note asking those submitting comments whether they wanted to be heard.</p>	
<p><b>6. Any Other Business</b></p> <p><b>a) Next Meeting</b></p> <p>It was noted that the next meeting could be on 27<sup>th</sup> January 2022. Dates for subsequent meetings would be circulated shortly.</p>	<p><b>ABP</b></p>

## West London Alliance

# Planning Policy Officers' Group

## meeting notes of 27<sup>th</sup> January 2022 (held remotely) draft

**Present:** Steve Barton (chairing, Ealing); Nick Lynch (Barnet); Paul Lewin (Brent); Ian Weake; Brianne Stolper (Ealing); Janda Thajinder (Hammersmith and Fulham); David Hughes (Harrow); Tom Campbell; Julia Johnson (Hillingdon); Christopher Kirk (Hounslow); Michael Thornton (Heathrow Strategic Planning Group); Tom Cardis (OPDC); Andrea Kitzburger-Smith (Richmond upon Thames); Natalie Chan (Transport for London); Emma Beal (West London Waste Authority); Andrew Barry-Purcell; Chris Young (WLA); Victoria Manning (London Waste Planning Forum); Michelle Berrington, Janice Burgess (National Highways)

**Apologies:** Sarah Dixey (Hammersmith and Fulham); Alison Bradshaw (TfL).

ITEMS / ACTIONS	LEAD
<p><b>1. Chair's welcome and previous notes</b></p> <p>Steve Barton (SB) welcomed members of the Group. The note of the previous meeting on 28<sup>th</sup> October 2021 was approved.</p>	
<p><b>2. National Planning</b></p> <p><b>a) National Planning Reforms</b></p> <p>SB noted that no Planning Bill had emerged as yet. The signs were that the new Secretary of State for Levelling Up, Housing and Communities was making a thorough review of the proposals in the "Planning for the Future" white paper and that the more radical proposals such as introduction of zoning were likely to be dropped. He had also noted that the current national housing need figures were based on out of date data about household formation. Victoria Manning (VM) said that she had met with DfLUHC civil servants and that levelling-up was Government's priority area with planning following later.</p> <p><b>b) Biodiversity Net Gain Consultation</b></p> <p>Andrew Barry-Purcell (ABP) noted that the Department for the Environment, Food and Rural Affairs (DEFRA) had issued a consultation on the practical arrangements for implementation of biodiversity net gain. The deadline for comments was 5<sup>th</sup> April.</p> <p>David Hughes (DH) said that Harrow was considering setting a 20% net gain requirement, which was already being put to developers informally. The key considerations were deliverability and viability.</p> <p><u>Agreed:</u> that a West London response to the DEFRA consultation would be prepared for approval by the Group.</p> <p><b>c) National Housing Delivery Test: 2021 Assessment</b></p> <p>The Group considered the outcome of the 2021 Housing Delivery Test Assessment, which covered the period 2018/19-2020/21. Over this period all West London boroughs had delivered more than 100% of "need", ranging from 106% for Hammersmith and Fulham to 186% for Hounslow. West London's overall delivery was 134% of need, which compares with 106% for East London, 97% for Central London and 94% for Core CAZ.</p>	ABP



Christopher Kirk (CK) said that Hounslow were having some difficulty reconciling the published figures with their own data. SB said Ealing were in a similar position, but that might reflect the delay in local plan adoption, which might pose a problem for the next assessment. Nick Lynch (NL) noted that the national figures never matched those published by the London Datahub.

### 3. Regional Planning

#### a) Mayor's Homebuilding Capacity Fund Projects- Progress

SB reported that Ealing's characterisation and hosing design guidance work had been published.

Paul Lewin (PL) reported that Brent was waiting to complete work on their draft Neasden Stations Growth Area Masterplan in March, following adoption of the local plan.

DH reported that Harrow had issued their draft Small Sites Design Code SPD for consultation.

#### b) London Plan Policy D12: Fire Safety/Issues with GLA London Datahub

It was agreed that concerns about the operation of London Plan policies on fire safety and the need to review these in light of national government's Planning Gateway One procedure should be raised in any West London response to the Mayor's consultation on future London Plan review work.

There was a discussion about the latest position on the London Datahub, which continued to raise concerns – the lack of reliable data was causing real difficulties in defending appeals and responding to Ombudsman cases. Obtaining data was still problematic, and what was produced was often inaccurate. There were cases where changes to rules on data were causing retrospective errors. It was agreed that the issue should be raised again with the GLA, first in responding to the Mayor's work programme consultation and then, if necessary, through a letter from West London authorities to Jules Pipe, the Deputy Mayor for Planning, Regeneration and Skills.

ABP

#### c) London Plan review: Planning for London Programme

It was noted that the Mayor had sought views on the scope of a future review of the London Plan and the work that should be done to inform it. The deadline for comments was 31<sup>st</sup> January. The Group agreed that it was worth submitting a West London response which should mention future work on small sites, drawing lessons from the Homebuilding Capacity Fund work, employment land, fire safety policy, strategic infrastructure and working with the wider southeast. The continuing problems with the London Datahub and the challenges this posed for having a robust evidence base for strategic planning should also be raised.

Tom Campbell (TC) drew attention to the parallel GLA consultation on the format and content of the London Plan Annual Monitoring Report. It was agreed that there should be a parallel West London response to this as well.

NL said that it was worth repeating the point that the London Plan should be a genuinely strategic plan and that any new plan should be streamlined. PL said that Brent were intending to respond. They would be seeking better and more consistent engagement with boroughs, including borough involvement in commissioning evidence base research; drawing attention to the sometimes unrealistic expectations London Plan policies made of borough planning departments and the resource implications of implementing policy on tall buildings.

<p><u>Agreed</u>: That a draft response to the Mayor's consultations would be circulated for comment/approval.</p>	<p><b>ABP</b></p>
<p><b>4. Sub-regional planning</b></p> <p><b>a) National Highways</b></p> <p>Michelle Berrington (MB), Head of Planning and Development at National Highways introduced herself and her colleague Janice Burgess (JB) who headed their Spatial Planning team and lead for the London region. She acknowledged the difficulties there had been in engaging with boroughs during their local plan processes. National Highways were setting up a system to monitor local plan work and identify where there may need to be issues that would have to be raised. They had regular meetings with Transport for London and were discussing the scope for joint work on modelling. JB said National Highways wanted to be more involved in the local planning process.</p> <p>It was <u>agreed</u> that it would be worth setting up a separate meeting with National Highways to gain a better understanding of the differences between their approach to modelling and TfL – and how these affected local plan-making.</p> <p><b>b) West London Orbital</b></p> <p>ABP reported that work to develop the business case for the West London Orbital was continuing despite TfL's financial situation; discussions were continuing about borough funding for the next stages of work. The West London Alliance and TfL had appointed Steer Group and Arcadis to examine the scope for raising funding for the project from development. He would keep the Group informed of progress</p> <p><b>c) Joint Evidence Base</b></p> <p><i>Strategic Infrastructure Delivery Plan</i>: ABP asked whether there was any objection to publishing the final report. There was none, and he agreed to circulate the link when publication took place.</p> <p><i>West London Town Centre study</i>: Janda Thajinder (JT) confirmed that Hammersmith and Fulham would not be participating in this work. ABP said he would circulate details of the cost of five boroughs proceeding.</p> <p><b>Improving community engagement</b></p> <p>It was <u>agreed</u> that a special meeting dedicated to this subject would be worthwhile.</p> <p><b>d) Waste</b></p> <p>VM (Programme Manager for the North London Waste Plan and Chair of the London Waste Planning Form) and Brianna Stolper (who project managed the 2015 West London Waste Plan) spoke about their experience of what would be involved in a review of the Waste Plan.</p> <p>VM explained the background to waste planning in London and how local waste plans addressed the apportionments set for each borough, recycling targets and the need to safeguard sites. There were two approaches that could be taken:</p> <ul style="list-style-type: none"> <li>• A standalone, sub-regional waste plan, for which consultants would do all the work including technical reports. A programme manager would draft the plan with support from constituent boroughs.</li> <li>• Waste policies could be included in each borough local plan separately. Consultants would</li> </ul>	<p><b>ABP</b></p> <p><b>ABP</b></p> <p><b>ABP</b></p> <p><b>ABP</b></p> <p><b>ABP</b></p> <p><b>ABP</b></p> <p><b>ABP</b></p>

prepare data and draft policies.

ABP

North London boroughs had worked collectively on the basis of a memorandum of understanding.

For West London the key issues were likely to be:

- Safeguarding existing sites
- Finding new sites to close the gap between the new waste apportionments and existing site capacity. Experience showed that calls for sites were rarely effective, particularly as operators tended to work to shorter timescales than local plans.
- The Old Oak/Park Royal Development Corporation, who did not have a London Plan waste apportionment, whose draft local plan did not deal with waste and who were seeking to release some waste sites.
- The duty to cooperate. This required engagement with authorities receiving strategic amounts of waste (there were agreed thresholds) and in practice, production of statements of common ground at regulation 19 stage.

Revising a waste plan could cost £200,000 for each year of the process. The examination process was particularly costly. There were few inspectors qualified to deal with waste plan examinations and this meant that it could take some time to arrange an examination. Technical studies and consultation were also quite costly. The process could take around two and a half years.

BS said that she had been project manager for the last West London Waste Plan when at Hillingdon. She had arrived at regulation 18 stage and at that point Mouchel were acting as consultants – they gave the contract up and new consultants had to be appointed, who had gone on to do a good job. They had identified sufficient capacity to fill the gap with apportionments. Following the problems the North London Waste Plan had encountered with the duty to cooperate she had done considerable work to ensure West London was covered. She had spent some time liaising with objectors and seeing the plan through examination.

SB said that experience with the last plan showed that there was little expertise in boroughs and that a collective approach was likely to be essential. Issues like the circular economy were more at the forefront of policy, but this remained a highly technical issue.

Emma Beal (EB) set out the national waste policy background – the Environment Act 2020 receiving Royal Assent, production of a Resources and Waste Strategy giving overall direction and a plastics tax dealing with packaging. It was likely these measures would encourage more recycling, moving towards halving household waste and doubling recycling. Although regulations to drive these changes were still being brought forward and these might not take effect until 2025 it would be important to prepare. In particular there would be a need for more sites both to manage waste and for facilities to prevent it arising.

SB noted that waste was another call on West London's scarce land resources. DH asked about the timescales over which a waste plan might be considered out of date. VM replied that waste plans were local planning documents so should be reviewed every five years. Apportionments had changed with publication of the new London Plan. If West London did not act collectively, boroughs would have to act through their local plans – or face general conformity challenges from the Mayor if they did not. The OPDC, which had come into being at the end of the previous West London Waste Plan examination and would need to participate. Tom Cardis (TC) said they would be glad to take part in a collective approach.

SB asked whether boroughs were happy to act collectively and start work; Ealing would. Andrea

Kitzberger-Smith said Richmond would take part – she had had a duty to cooperate meeting with the GLA at which the waste planning issue had been raised. CK said Hounslow recognised this would need to be addressed and DH agreed. Julia Johnson (JJ) said that Hillingdon would have to consider the matter and Paul Lewin (PL) agreed.

It was agreed to return to the matter at the next meeting.

Agreed: That:

- i) A briefing note on the issue would be prepared for boroughs to use in raising the issue with senior managers/elected members
- ii) A briefing session would be arranged for elected members after the borough elections

**ABP**

#### **e) Local Area Energy Planning**

ABP reported that a group of West London boroughs were developing proposals for a sub-regional approach to local area energy planning. This would start by identifying current patterns of energy demand and supply in West London, forecast future demands and planned infrastructure, areas of current and likely future infrastructure deficit and ways of decarbonising energy to help meet net zero targets. A second stage would develop local energy action plans at more local levels. This would provide valuable evidence for local plans.

It was likely that the work would be funded by the GLA. Consultants would be appointed to do the detailed technical evidence-gathering and to run future energy scenarios and a specification was being prepared. The work would be steered by a West London Energy Partnership. He would keep the Group informed of progress.

#### **f) Heathrow Strategic Planning Group**

Michael Thornton (MT) reported that HSPG had held a mini-summit of its members to agree a work programme for the next twelve months. Its member authorities had agreed to continue funding the work, and Windsor and Maidenhead had returned to membership.

The priorities for the next year would be:

- Net zero, including looking at the potential for a carbon offsetting fund
- Energy infrastructure funding, working with Heathrow Airport Ltd (HAL) and with West London boroughs on their local energy action planning.

HAL would shortly publish its sustainability strategy - Heathrow 2.0. This would aim to achieve net zero carbon by 2050, but it touched on a number of other areas as well. It was disappointing in a number of ways and HSPG aimed to press HAL to go further and quicker. In particular it should cover the circular economy, particularly as expansion would take out an incinerator.

He said HSPG would also respond to the Mayor's consultation on future London Plan work.

Heathrow had handled 19.4m passengers over the last year, 25% of the 2019 level. They projected handling 43m this year (just over 50% of 2019). While the third runway remained national policy, it was likely to be looked at again in the context of the Government's Jet Zero strategy – but the timescale for this was unclear.

## 5. Borough and Other Authorities' Updates

Barnet had submitted their local plan for examination. The Inspector had been appointed and they were awaiting his initial questions. They had held the examination of their revised CIL charging schedule and were awaiting the outcome.

Brent had received the final inspector's report on their local plan. It had been found sound and would go to full council for formal adoption on 24<sup>th</sup> February,

Ealing were carrying out early informal consultation and to date had received 7,000 responses with 4,000 people signing up for further information. They intended to issue a draft plan for regulation 18 consultation in the summer.

Harrow were likely to conduct a regulation 18 consultation mid-year .

Hillingdon were also likely to issue a draft for regulation 18 consultation after the May elections.

Hounslow had had the first set of examination hearings on their Great West Corridor/West of Borough plans. They would be consulting on changes made as a result of comments from the inspectorate and there would be further hearings later in the year. In the meantime they proposed to out a draft Character and Design supplementary planning document out for consultation in late March/April; they would be using an innovative interactive map tool to support consultation. A proposed article 4 direction covering class E uses was being considered by their Cabinet.

OPDC: examination hearings on their proposed main modifications had been held the previous week and the final report was expected in March, which would allow adoption in the spring. They were consulting on a Planning Obligations SPD in the spring and proposed to consult on an industrial uses one (focusing particularly on datacentres) in the summer.

## West London Alliance

### Planning Policy Officers' Group

#### meeting notes of 19<sup>th</sup> May 2022 (held remotely) draft

**Present:** Nick Lynch (chairing, Barnet); Ngaire Thomson (Barnet); Ciara Whelehan (Brent); Ian Weake; Brianne Stolper (Ealing); Thajinder Janda, Rebecca Yee (Hammersmith and Fulham); David Hughes (Harrow); Tom Campbell (Hillingdon); Christopher Kirk (Hounslow); Michael Thornton (Heathrow Strategic Planning Group); Josephine Vos (Transport for London); Emma Beal (West London Waste Authority); Andrew Barry-Purcell (WLA); Peter Blake, Janice Burgess (National Highways)

**Apologies:** Steve Barton (Ealing); Sarah Dixey (Hammersmith and Fulham); Alison Bradshaw (TfL).

ITEMS / ACTIONS	LEAD
<p><b>1. Chair's welcome and previous notes</b></p> <p>Nick Lynch (NL) welcomed members of the Group. The note of the previous meeting on 27<sup>th</sup> January 2022 was noted. There were no matters arising.</p>	
<p><b>2. National Planning</b></p> <p><b>a) National Planning Reforms</b></p> <p>The Group discussed the Levelling Up and Regeneration Bill, which had received its first reading on 11<sup>th</sup> May. Andrew Barry-Purcell (ABP) said that he had circulated a note about the main provisions of the Bill and another dealing specifically with its implications for the London Plan, which were potentially significant. The Bill marked a significant degree of centralisation and many of its key provisions were loosely drafted.</p> <p>Tom Campbell (TC) said that in preparing local plans boroughs would have to bear in mind the potential for long relied-upon policies in the London Plan disappearing in the new system. The proposed restriction on local plans dealing with national development management policies could cause real problems if boroughs were unable to adapt them so they could be applied locally – particularly as national policy was often poorly expressed and had to be interpreted at local level. It seemed likely that many of these issues would be resolved by the courts. Michael Thornton (MT) pointed out that nationally prescribed policies would be adopted after a consultation exercise, not the kind of detailed scrutiny local/London plans received at examination. He did think having national policies on some things was beneficial, but noted that when Scotland replaced regional policies with national ones, issues like airport policy had been dropped.</p> <p>TC said it would be important to ensure proper – and workable – transitional arrangements were in place, so it was clear when the overriding status of national policy became operative.</p> <p>NL asked whether there was any scope for lobbying/briefing parliamentarians. ABP said that he could provide assistance to any borough wanting to brief local Members of Parliament and to coordinate West London responses to consultations likely to be conducted by Government as the Bill proceeded.</p> <p>MT raised the announced proposals to replace the duty to cooperate and end the 300,000 homes per year target. ABP suggested that the substance of these could be carried forward through changes to national policy, the tests of soundness for local plans or through the examination process. TC said that Joanna Averley, the Department for Levelling Up, Housing and Communities'</p>	

Chief Planner had told a briefing on the Bill that showing a “good faith effort” to ensure alignment with neighbouring authorities would be sufficient. The Planning Advisory Service was likely to explore the position so it could produce a template for authorities’ use.

Rebecca Yee (RY) mentioned the proposed Infrastructure Levy. She noted that the Mayor would continue to be able to levy the Community Infrastructure Levy. There would need to be proper transitional arrangements from CIL to the new system.

#### **b) Biodiversity Net Gain Consultation**

ABP noted that a West London response had been submitted to the Department for the Environment, Food and Rural Affairs’ consultation on the practical arrangements for implementation of biodiversity net gain, which had been circulated. He thanked everyone who had contributed.

TC said the proposed credit system could bring the new system into disrepute as it separated delivery of net gain from the location of the development giving rise to the requirement. The system would require monitoring that boroughs were not necessarily resourced to carry out.

### **3. Regional Planning**

#### **a) London Plan Policy D12: Fire Safety/Issues with GLA London Datahub**

ABP said that concerns had been expressed by the Chief Planner’s Group about the operation of the London Plan policies requiring submission of fire safety information in the planning process. Planners were unqualified to assess this information and there were limits to the extent the planning system could deal with the issues involved, which were more properly matters for building control. This was causing concerns among both officers and elected members. The Mayor was consulting on draft guidance on the policies and a draft West London response had been prepared for discussion.

Ciara Whelehan (CW) said that this was an issue of concern at Brent and that they would be responding themselves in strong terms, given the difficulty officers had in giving advice on the policies. NL said that Barnet might follow suit. ABP said that the deadline for comments was 20<sup>th</sup> June, and the draft response would be considered by the Chief Planners’ Group in June.

On the London Datahub, TC said that Hillingdon had received data from the GLA which appeared to be incomplete. They had gone back to the GLA saying that they could not start recording housing starts and completions until the situation was resolved. Starts and completions were being done in the same way as the previous year despite promises given then. The GLA was not checking data and were relying on boroughs to do so, who then had to manually correct automatically updated data. Hillingdon was continuing to work with the GLA, but it seemed that there were still fundamental problems with the system. CW agreed; data for Brent appeared to miss large numbers of permissions.

Brianne Stolper (BS) said that Ealing had made progress in rectifying their issues with the Datahub, although the issue had caused difficulties for the Borough including an adverse Ombudsman report and an appeal decision questioning their five year supply of housing land. TC added that it was now impossible to reconcile Datahub figures with those published by DfLUHC – and boroughs were being sanctioned for missing National Housing Delivery Test targets based on those. There appeared to be fundamental problems with the Datahub and the fixes to date had not remedied



<p>the situation.</p> <p><u>Agreed:</u> To invite Peter Kemp (GLA) to the next meeting of the Group to address boroughs' concerns about the Datahub.</p>	<p><b>ABP</b></p>
<p><b>4. Sub-regional planning</b></p> <p><b>a) Waste</b></p> <p>ABP said that at the previous meeting of the Group he had agreed to prepare a briefing note for borough decision-makers about the need to review the West London Waste Plan and options for how a review might be carried out; he had circulated this with the agenda for the meeting.</p> <p>Emma Beal (EB) said that there had been considerable legislative change as well as a greater focus on tackling climate change since the present plan had been adopted. There was also concern about the loss of waste sites to other uses. The objective now was to halve the amount of waste disposed of and double the amount of recycling; this would require more space for sorting and storing material. MT asked whether the scope for generating hydrogen using energy from waste was being considered. EB said that this was something that would be kept under review leading up to the end of the Waste Authority's energy for waste contracts, but that this would still count as disposal and so at the bottom of the waste hierarchy. There was a need to decarbonise energy from waste as with other handling options. Ian Weake (IW) said it was important not to focus solely on the household, commercial and industrial waste streams covered by the London Plan waste apportionments and to take account of moves to a circular economy.</p> <p>There was a discussion of the estimated costs involved in review of the Plan and the amount of officer time that might be required at different stages of the review process. ABP said that the estimates in the briefing paper were based on experience of the North London Waste Plan, but that much would depend on issues like the extent of additional technical work that might be required as a result of recent legislative changes and the division of labour between boroughs and consultants.</p> <p><b>b) Joint Evidence Base</b></p> <p><i>Strategic Infrastructure Delivery Plan:</i> ABP said that the SIDP had been published in March and the link to the document on the WLA website (<a href="https://wla.london/west-london-strategic-infrastructure-delivery-plan-published/">https://wla.london/west-london-strategic-infrastructure-delivery-plan-published/</a>) had been circulated.</p> <p><i>West London Town Centre study:</i> ABP reported that an inception meeting had been held. Participating boroughs would shortly be invoiced for their share of the cost and a workshop to discuss the phase one findings would then be organised.</p> <p><i>West London Local Area Energy Planning:</i> ABP reported that work was underway on sub-regional local area energy planning. The first phase – to be funded by the GLA – was a sub-regional approach to identifying current and future energy needs in West London and the infrastructure required to meet these – and to find ways of decarbonising energy supply to help meet Climate Emergency net zero targets. Electricity supply was already a constraint on development in some places and this work would help identify where this was an issue and how it might be addressed. The outcome was likely to be a valuable resource for local plans, infrastructure delivery planning and development management. The second phase would be to move to borough-based action planning; the Old Oak/Park Royal Development Corporation had indicated they would be taking this step and it was likely that some boroughs would decide to do the same. The Group would be</p>	<p><b>ABP</b></p>

kept informed of progress.

TC asked whether data centres – which in some places were making major demands on local supply infrastructure – would be covered by the work. ABP said that they would; this was a major issue for authorities in West London and across the London boundary.

**c) Any issues for joint consideration/work arising from the local elections**

NL highlighted that Labour had taken control of Barnet and were declaring a climate emergency. There would be a meeting with the planning portfolio member the following week to decide on next steps with the local plan.

DH highlighted that the Conservatives had taken control in Harrow and were giving planning a high profile. There would be a Cabinet meeting the following week that would consider preparation of a supplementary planning document on tall buildings, free parking in town centres and issuing a residents' card. The new administration had not given a steer on future involvement in sub-regional work.

**d) Sub-regional flooding risk assessment**

The Group discussed arrangements for hosting/maintaining the West London SFRA web site. This was being managed by Metis, under contract with Brent on behalf of West London boroughs. Metis had informed Brent that the hosting fee for 2022/23 would increase from £3,010 to £3,100 (excluding VAT). CW asked the Group whether they would be content to continue the arrangement with Metis for a further two years and split the cost. She drew attention to an email sent to Group members by Claire Bradley on 13<sup>th</sup> May which had set out the proposal for continued hosting and some potential updates to the policy map for the Silk Stream, Upper Colne, River Lee and River Crane and for update the flood zone 3a and 3b modelling for Hounslow. While the Silk Stream affected all boroughs, the rest of these only involved some and Claire's email had suggested breaking down the costs of this work by affected borough.

TC asked about the scope for adding additional updates, particularly to add data held by boroughs. Ngaire Thomson (NT) said he was happy with the way Metis had worked with Barnet on their local plan; given the need to give more attention to the handling of applications for development on sites prone to flooding to ensure sustainable drainage options she thought it would be possible to update the maps with information from applications or policy work. NL added that Barnet would be happy to go on contributing to the costs.

CW said that the additional areas of work mentioned might have to be taken forward as a separate commission. It might be easier to take the decision on continued hosting first and then explore further areas of work. TC suggested that the best way forward would be for boroughs to respond to Claire's email and there could be a further meeting to discuss additional work.

Agreed: that boroughs would reply to Claire Bradley's email about SFRA hosting arrangements and further areas of work.

ALL

**e) West London Orbital**

ABP reported that work to develop the business case for the West London Orbital was continuing. The West London Alliance and TfL had appointed Steer Group and Arcadis to examine the scope for raising funding for the project from development and the consultants were starting to produce outputs – he would continue to keep the Group informed of progress. Decisions would shortly be taken about funding of the next stage of work on the project and about other work the boroughs might undertake on areas like project funding. These decisions would depend on the City

Corporation agreeing to changes in the way Strategic Infrastructure Pot resources could be used.

#### **f) Heathrow Strategic Planning Group**

Michael Thornton (MT) reported that Heathrow's post-pandemic recovery was inconsistent, with marked peaks – Easter had been quieter than expected. It was possible that demand would be sensitive to the state of the economy, fuel and other costs and the international situation. Heathrow was less confident about custom than other airports. In the meantime Heathrow was experiencing major recruitment and skills issues, having let too many people go during the pandemic.

More widely there was a lot of thinking about the future of airports and aviation generally in light of the Government's Jet Zero proposals and the pandemic. However there was a clear lack of any national policy framework for the future of the industry. In particular, there was no attempt to link up airspace and land use planning which would enable thought to be given to the impacts of potential innovations like greater use of drones for logistics and how this might impact on amenity.

The Government was due to publish an aviation strategy during the summer which might give a better idea about airport expansion, but there was little evidence of any interest in strategic planning for likely demand. This gap was an issue for the planning permission, and he was speaking to the Royal Town Planning Institute about it.

HSPG activity was in something of a hiatus as Slough was no longer able to act as host authority and they were moving to Hounslow. There would be an HSPG spatial planning workshop on 9<sup>th</sup> June and to this end he had circulated a questionnaire to member authorities about trends in their area relating to workspace. The questionnaire would also be circulated to Group members and any views would be welcome,

**ABP**

#### **g) National Highways**

Peter Blake (PB) said that National Highways were continuing to engage with TfL about approaches to modelling and hoped to be able to give some guidance in due course. NL asked about a statement of common ground that was awaiting an NH

### **5. Borough and Other Authorities' Updates**

Barnet was starting the local plan examination process, but had yet to receive the matters and questions from the inspectors. A new Community Infrastructure Levy charging schedule had come into force in April. The elections had seen a new administration and their steer on the way forward on the local plan was awaited.

Brent had adopted the Neasden Stations Growth Area SPD and were having pre-application discussions for the area already. They hoped to adopt SPDs on planning obligations and affordable workspace under officers' delegated powers. They had received Design Pathfinder funding from the Government for work with Barnet in Staples Corner which would involve design coding for all or part of the area; it was a condition of the funding that there was a code ready for consultation by March 2023. DfLUHC had informed the Council that they were unconvinced of the justification for article 4 directions relating to Class E uses and, in particular, the evidence for the areas covered. A meeting had been arranged for the next week. An SPD on houses in multiple occupation was being prepared to support the article 4 direction they had for HMOs.

TC said that Hillingdon had had a similar email from DfLUHC about their proposed directions and also had a meeting arranged – for the day before Brent's.

Ealing had been given approval to start regulation 18 consultation in late summer/autumn. Work had started on drafting the plan and finalising the evidence base.

Hammersmith and Fulham did not as yet have firm dates for review of their local plan. Work was continuing on SPDs, with consultation on documents on affordable workspace and railway arches with a view to adoption in July.

Harrow were awaiting a steer from their new administration about the programme for local plan review. This was likely to be later than previously envisaged because of pressure of other work, but it might be that regulation 18 consultation would take place towards the end of the year. In the meantime they would be working on an SPD dealing with tall buildings.

Hillingdon had suspended their draft article 4 directions in light of the approach they had received from DfLUHC and would need to clarify their position before deciding what to do. They anticipated issuing a regulation 18 draft local plan by the end of the year/early 2023.

Hounslow would have a new Leader following the election. They had just completed work on their Character and Design Code; consultation had just been completed and they might reconsult later in the year. They were continuing work on a digital map-based platform that was being developed with DfLUHC funding which they intended to use for local plan consultation in the future. As far as the local plans currently under examination were concerned, the Council would be reconsulting as required by the inspector and if that was successful the examination would move on to issues like design and heritage.

TfL: the position regarding longer-term funding as still unclear; the Government had given a short-term deal that ran out in June. They were working with the GLA on the response to the Levelling Up and Regeneration Bill. TfL was also seeking to resolve its role and relationship with regard to Active Travel England.

## **6. Any other business**

TC asked what information about the supply and demand for office space would be provided by the West London Town Centre Study. ABP said he would be seeing the consultants and would ask.

NL asked whether other authorities had used a questionnaire for developers of major schemes about likely delivery to help inform housing trajectories. CW said that Brent had contacted developers about scheme progress, usually by email. TC said that Hillingdon had informally used the definition of “deliverable” in the National Planning Policy Framework’s Glossary as the basis for a proforma for making such requests, but had not published a form.

**Date of next meeting: 14<sup>th</sup> July 2022**

## West London Alliance

# Planning Policy Officers' Group

## meeting notes of 14<sup>th</sup> July 2022 (held remotely) draft

**Present:** Steve Barton (chairing, Ealing); Nick Lynch (Barnet); Paul Lewin (Brent); Sarah Dixey, Rebecca Yee (Hammersmith and Fulham); David Hughes (Harrow); Tom Campbell (Hillingdon); Michael Thornton (Heathrow Strategic Planning Group); Katherine Pelton (Transport for London); Andrew Barry-Purcell (WLA).

**Apologies:** Christopher Kirk (Hounslow).

ITEMS / ACTIONS	LEAD
<p><b>1. Chair's welcome and previous notes</b></p> <p>Steve Barton (SB) welcomed members of the Group. The note of the previous meeting on 27<sup>th</sup> January 2022 was noted. There were no matters arising.</p> <p>SB noted that Andrew Barry-Purcell (ABP) would be leaving the West London Alliance at the end of August and thanked him for his work while at the WLA. ABP thanked members for their support and said that the WLA would be making arrangements for the future administration of the Group.</p>	
<p><b>2. National Planning</b></p> <p><b>a) National Planning Reforms</b></p> <p>The Group discussed the Parliamentary progress of the Levelling Up and Regeneration Bill, which was now going through its Commons committee stage. Although there had been a change in Secretary of State, Government policy on the Bill had not changed; in particular the intention to give primacy to national development policies in taking planning decisions remained. ABP said that at a recent event Simon Gallagher (Director of Planning at the Department for Levelling Up, Housing and Communities (DfLUHC)) had maintained that this was to deal with the problem of out-of-date plans, but had acknowledged that this had not been communicated effectively. He had also made it clear that the national policies were likely to cover things like green belt and flood protection; if it was really intended that local plans could not deal with the substance of these issues it might make strategic planning for outer London boroughs difficult.</p> <p>SB agreed it might be extremely difficult to implement the new system and to observe the line between repeating and being consistent with national policy. A lot of the detail of the new local planning system would have to be filled in by regulation and there was likely to be a large number of consultations in the near future. It could be at least a year after the Bill received Royal Assent before its implications could be properly assessed, however in the meantime he thought it was vital to continue plan-making, noting that the Government's December 2023 milestone for plan adoption remained. David Hughes (DH) said he had been at an Association of London Borough Planning Officers meeting at which a DfLUHC representative had also encouraged continued progress in local plan-making.</p> <p>SB said there were other worrisome features of the Bill, particularly proposals for an Infrastructure Levy, which he thought would be hard to implement. Paul Lewin (PL) said he had recently been at an Urban Design London event where a DfLUHC representative had struggled in explaining how the Infrastructure Levy and the Bill's other proposals relating to infrastructure</p>	

<p>planning would work in practice.</p> <p>Nick Lynch (NL) pointed out that the change of national government leadership might slow implementation of the new system, particularly if there was an early general election.</p> <p>Michael Thornton (MT) said that the scope of nationally-prescribed policies would be critical and SB added that the level of prescription the Government was imposing highlighted the continued value of non-statutory joint planning.</p> <p>ABP said he would circulate details of any consultations from Government so West London responses could be considered.</p>	
<p><b>3. Regional Planning</b></p> <p>ABP reported that at the same event he had attended, the Deputy Mayor for Planning, Jules Pipe, had said the Mayor did not intend to review the London Plan as he considered it had been vindicated by London's recovery from the pandemic. Instead they would focus on production of guidance. The Mayor was concerned about the Levelling Up and Regeneration Bill and was disgruntled about the fact he had not been invited to give evidence to the Bill Standing Committee. His areas of concern were the proposed restrictions on the content of the London Plan, the limitation of Mayoral supplementary plans to questions of design and the operation of the proposed infrastructure levy.</p> <p><b>a) Issues with GLA London Datahub</b></p> <p>ABP said that he had invited Peter Kemp to attend the meeting, but a personal commitment had prevented this.</p> <p>SB said there were still problems with the Datahub, and it was proving difficult to get to the required level of service. The additional resources that had been provided by the GLA had proved inadequate. Elected members were annoyed that the data produced could not be relied upon. The data being made available on an open source basis by the GLA was inaccurate, which meant those using it to do their own analysis were coming up with (and publicising) inaccurate conclusions. The GLA had not produced an action plan for resolving these issues.</p> <p>PL said some progress had been made in Brent, with a lot of hitherto missing data recovered. NL said that historic numbers for Barnet still seemed questionable. Tom Campbell (TC) said that in his experience the same issues kept being raised with the GLA, but never appeared to be resolved. Some items first raised two years ago remained unresolved. Promised training had not materialised. The GLA needed to address some basic issues but progress to date was not encouraging and there seemed a risk that the next London Plan might be prepared on the basis of inaccurate data. The Datahub also prevented boroughs from maintaining control of their data. He thought the best way forward would be to assemble a list of issues needing to be addressed and to seek a meeting with the GLA to go through them.</p> <p>It was <u>agreed</u> to approach Lucinda Turner at the GLA for a West London meeting on a "remote" basis. TC agreed to prepare a short paper that would form the agenda for a meeting.</p>	<p><b>TC/ABP</b></p>

#### 4. Sub-regional planning

##### a) Waste

ABP said that arrangements for review of the West London Waste Plan would be discussed at the meeting of the West London Environment Directors on 19<sup>th</sup> July; he had circulated the paper that would be considered at that meeting. This proposed setting up a steering group with members from each of the WLWP boroughs to develop a detailed timetable and cost estimate for the revision. It would also ask whether any borough was willing to put themselves forward to lead the project.

TC said that Hillingdon did not have the capacity to be lead authority as it had before. SB noted the importance of Old Oak/Park Royal Development Corporation involvement.

It was agreed to consider progress at the next meeting of the Group.

##### b) Joint Evidence Base

*West London Town Centre study:* ABP noted that procurement formalities having been resolved, a workshop on the first phase of work would take place on 19<sup>th</sup> July.

*West London Local Area Energy Planning:* ABP reported that the consultancy contract for work on West London local area energy planning was now out to tender. Bids would be evaluated during August.

In the meantime the question of the demands datacentres were making on the electricity supply network, particularly in that part of West London served by Scottish and Southern Electricity Networks, and the impacts this was having in impeding other developments, had become pressing. The GLA had written to boroughs about the issue and the work they were doing to resolve it; they were organising a meeting with SSEN and National Grid that would be attended by the boroughs concerned.

TC said the underlying issue was the lack of any prioritisation by the distribution network operators in offering connections to the network – they were distributed on a “first come, first served” basis. It would be important to address the fundamental issue as well as firefight the immediate problem. The lack of any mechanism to manage the allocation process meant the planning system might be the only mechanism to exert some control over the situation. But using it – for example by refusing permission for a datacentre – would require an evidence base to justify the decision and defend it on appeal.

Michael Thornton (MT) said that the Heathrow Strategic Planning Group (HSPG) had agreed to do some work on the issue and would be keen to work with West London boroughs. Sarah Dixey (SD) said the issue was also of concern to Hammersmith and Fulham and asked whether there was scope to address the issue through joint work on infrastructure delivery plans. SB said Ealing were scoping an IDP for Ealing, which would deal with this issue.

It was agreed to return to the issue at the next meeting of the Group.

ABP

##### c) West London Orbital

ABP reported that work to develop the business case for the West London Orbital was continuing. The West London Alliance and TfL had appointed Steer Group and Arcadis to



examine the scope for raising funding for the project from development and the consultants were starting to produce outputs – he would continue to keep the Group informed of progress. Decisions would shortly be taken about funding of the next stage of work on the project and about other work the boroughs might undertake on areas like project funding. Given Transport for London’s financial position these decisions would depend on the City Corporation agreeing to changes in the way Strategic Infrastructure Pot resources could be used. Consideration was also being given to how the project would be taken forward once he had left the GLA.

#### **d) Heathrow Strategic Planning Group**

Michael Thornton (MT) commented on Heathrow’s problems with handling traffic over the summer, resulting in a cap on flights. More night flying was taking place and there was a consultation on allowing even more. Although problems were being encountered by airports across Europe, those in the UK appeared particularly affected.

HSPG were discussing Heathrow’s 2022-27 Masterplan, which included decarbonisation measures, revamping their cargo facilities and improving baggage handling. Their financial settlement for the period had not yet been finally agreed by the Civil Aviation Authority (CAA).

HSPG’s Environment and Airspace Group would be responding to consultation by the CAA on airspace modernisation. Its Spatial Planning Group was looking at employment land issues. The Surface Access Group was working on sustainable access options and would be commenting on the Mayor’s proposals for a pan-London ultra-low emissions zone.

On UK aviation policy more generally, the Government had published “Flightpath to the Future - a strategic framework for the aviation sector”. This set overall objectives in areas like airport expansion, rather than detailed policies. A decision on expansion at Farnborough Airport was expected shortly.

He said there was a clear disconnect between planning for airspace use and land use planning, which HSPG was seeking to align.

HSPG were now being hosted by Hounslow due to Slough Council’s financial situation.

#### **5. Borough and Other Authorities’ Updates**

Barnet was in the midst of the examination process for its draft local plan. They had received matters, issues and questions from the inspectors and were working their way through these. The examination would be a two stage process, with the second stage arranged once the first had been completed to the inspectors’ satisfaction.

Brent Cabinet had now decided to adopt supplementary planning documents of planning obligations and affordable workspace; the call-in period ran out the next week. Cabinet approval to consult on an SPD on houses in multiple occupation would be sought the following Monday with an eight week consultation period. Following a meeting with DfLUHC about proposed article 4 directions they intended to move to confirmation; they had not provided further information to Government but had sought to narrow the areas (and so the non-E Class uses) covered to go some way to meet their concerns.

Ealing would issue a regulation 18 draft plan on 12<sup>th</sup> October for an eight week consultation period, with a view to moving to regulation 19 before the end of 2023. In the meantime work continued on the evidence base. An application for designation of Rothschild Orchard Neighbourhood Forum – covering an area near Ealing Common – was out to consultation.

<p><u>Hammersmith and Fulham</u> were examining the potential impacts of the proposed infrastructure levy. This was causing concern given the difficulty of predicting how much might be raised to pay for infrastructure as payment would be made on sale, particularly where developments were completed piecemeal. There was particular concern about paying for affordable housing.</p> <p><u>Harrow</u> were working on their new administration's key priorities – tall buildings and conversions. This had meant work on the local plan had been paused. They were compiling an evidence base with a view to starting regulation 18 consultation next year. Beverley Kuchar had been replaced as Interim Chief Planning Officer by Viv Evans.</p> <p><u>Hillingdon</u> had decided to press ahead with their article 4 direction, which was being confirmed that evening. Nothing further had been heard from DfLUHC. Work on the local plan review was continuing. James Rodger had left his post as Director of Planning and Regeneration and Julia Johnson would be acting up.</p>	
<p><b>Date of next meeting: Thursday, 3<sup>rd</sup> November 2022</b></p>	

## **WLA Planning Policy Officers 3<sup>rd</sup> November 2022 2pm Virtual**

### **Attendees:**

Janice Burgess National Highways, Callum Sayers LB Harrow, David Dewar LB Hounslow; Emma Beal WLWA, David Galthorpe LB Hammersmith & Fulham; Michael Thornton Heathrow Strategic Planning Group; Katherine Pelton TfL; Tom Campbell LB Hillingdon; Tom Cardis OPDC, Sam Cuthbert LB Ealing and Steve Barton LB Ealing (Chair), Paul Lewin LB Brent and Andrew Barry Pursell – LB Barnet.

Apologies: Chris Kirk LB Hounslow, David Hughes LB Harrow and Nick Lynch LB Barnet

**Previous Meeting Notes:** Agreed – no changes.

### **National policy background**

Huge changes – unclear policy directions until new PM and ministers settle in. Financial implications of mini-budget plus interest rates going to have impact on development activity, viability and council resources. Perennial RTPI call for more resources for planning authorities been made. Net-zero costs/ environmental agenda likely to face big challenges given squeeze on resources – although national commitment likely to be greater than might have occurred with Truss agenda.

### **Strategic Planning**

**Datahub:** Thanks to Tom & Ian. Meeting set up with Lucinda Turner for 11<sup>th</sup> November 2022, LB Ealing, Barnet & Hillingdon invited. Others can attend to show solidarity. Tom to recirculate notes of meeting with datahub team.

On-going issues with accessibility to improve data.

**GLA:** Walking & Cycling Guidance coming soon. Also a series of four public consultation events on various topics – likely to be parallel borough engagement from early next year.

**WLWA:** – huge amount of work undertaken on reviewing how to deal with waste streams currently being collected to address rising costs – move towards greater promotion of the circular economy to reduce cost of waste disposal/ improve management of waste – possibly retailing capacity to sell items required and additional land to provide for this capacity.

**Waste Plan Review:** Not clear where it had got to in terms of WLA decision making at directors group. In principle OPDC agreed to potentially project manage, subject to greater clarity on timetable and funding plan being understood.

### **WLA Joint evidence base:**

Class E work – draft study – meeting with consultants planned for WC 14<sup>th</sup> November.

Energy - LEAP – data collection by the consultants is being undertaken.

Datacentres and energy supply – GLA provided an update on agreement with energy providers for better provision which is looking a bit better in terms of making progress on improving capacity. Issue of whether energy capacity should influence determination of planning applications – is it a material consideration? GLA infrastructure seeking to work more closely with GLA planning to provide clarity on whether guidance at a strategic level will be forthcoming. Might be a role in LPAs lobbying energy regulator to be able to provide sufficient data to understand future capacity requirements.

## **West London Orbital**

Funding of support for the line – TfL want a proper agreement between them & Ealing to ensure funds are there to support their design work/ taking the project forward. So far they have done Thameslink, Brent, OPDC station designs to take additional passenger load – other stations to be done and capacity of junctions and level crossings on routes. Network Rail looking at train capacity and power capacity to support new generation of electric trains. Brent possibly going to appoint a project manager to take forward the work previously done by ABP. Additional work on CIL funding to support delivery will be done by Steer, subject to boroughs agreeing to make such funds available in principle. TfL making positive noises on funding availability in the future to progress with the project, which is positive given very large public sector finance squeeze.

Is there potential for a West London strategic CIL/ funding mechanism? Currently hamstrung by regulations not allowing such approaches in London, due to Mayor's strategic role.

## **Heathrow:**

Airport doing better than other hubs – but well down on previous capacity pre-Covid – with expansion now not a priority. Future direction at national level in terms of aviation/ green agenda is not particularly clear in terms of expansion potential. Alternative forms of airspace use growing for drones, etc. is advancing at pace. Prospect of very complicated processes with a need to create better co-ordination between aviation and land use policy.

## **Updates:**

**National Highways:** Draft version of route strategies might appear towards the end of the year/ early next year.

**TfL:** Nothing further to that already covered.

**OPDC:** Adopted plan in Summer. Planning Obs SPG consultation 8<sup>th</sup> November close. CIL update coming forward. SIL and Environment SPGs – HMO Article 4 being taken forward. Class E SIL Article 4 confirmed – no further intervention from SoS.

**Harrow:** Tall Buildings SPD being drafting in consultation with GLA. Reg 18 September 2023 indicative timetable currently.

**Hounslow:** Character SPD consultation – Couple of Article 4s – HMOs to be confirmed later this year with a SPD. Class E article 4 Cabinet report next year. New Director coming in the new year. Danalee leaves end of November.

**Waste London Waste Authority:** Nothing further to update apart from above.

**Hammersmith:** Affordable workspace SPD just adopted, Railway Arches SPD adopted. Climate change SPD consultation in new-year.

**Brent:** Draft Church End SPD consultation currently. Sustainability SPD and amenity space SPD early next year. HMO SPD nearly adopted – C4 Article 4 came into effect 1<sup>st</sup> November 2022. Various Class E article 4s – all confirmed – on-going issue with DLUCH – requesting more evidence. Likely council not planning to do more work – just see what SoS does. Down to 2 post holders in the coming weeks but recruitment process for two posts occurring.

**Hillingdon:** Article 4 Class E confirmed awaiting SoS decision on whether to intervene. Seeking to progress a SHMA update.

**Ealing:** Reg 18 – 30<sup>th</sup> November 2022 – 8 weeks consultation – tall buildings policy an issue now hopefully resolved.

**Barnet:** In examination. Inspectors going through things in great detail – done a number of notes for them.

## Planning Policy Officers' Group

2<sup>nd</sup> February 2023, 2-4.30 pm

Virtual meeting, via MS Teams

### Minutes

#### Attendees

Steve Barton	LB Ealing
Christopher Kirk	LB Hounslow
Sarah Dixey	LB H&F
Samuel Cuthbert	LB Ealing
Emma Beal	WLWA
Anthony McNamara	WLA
Tom Campbell	LB Hillingdon
Michael Thornton	HSPG
Andrew Barry-Purcell	LB Barnet
Emily Shovlar	LB Ealing
David Hughes	LB Harrow
Michael Thornton	HSPG
John Bryson	LB Barnet

#### Apologies

Alison Bradshaw	TfL
Janice Burgess	

#### 1. Welcomes, intros, announcements

Previous meeting notes - agreed

#### 2. National Planning Reforms

Government has published its National Planning Policy Framework Prospectus – Deadline for responses is 2<sup>nd</sup> March 2023.

Is there any interest in a joint response or at least to share responses?

Concerns noted include funding and infrastructure (S106, CIL) and the potential impacts this may have. Housing numbers and a test of soundness along with a loss of evidence.

It includes targets and penalties for LA of waste separation – how is this reflected in planning policy and other policies?

Overall, considered a one size fits all that won't work. SB will share what comes from the Planning Officers Society.

**ACTION:** SB to circulate POS draft response to NPPF – Complete.

### 3. Regional Planning

#### a. **Data hub** – to be a standing item. (SB)

Slow but good progress is being made, the GLA recognise there is an issue and the basics need to be improved. The LDD will return in all but name and it will be possible to view and edit data – back office model, for now anyway. Issues remain over data formats and uploading data which requires ‘humans’ to validate.

1<sup>st</sup> June will open for correction of last years numbers but this won’t update to other sources and you may wish to publish corrections on your websites. HDT results will be delayed.

Related... Digital London SHLA.

GLA are trying to bring this back. It was suggested by TC that the GLA create one platform for all LAs to use instead of individual proformas etc.

Small site SHLA should be kept separate (with a bottom up approach or keep to a trend based formula) but we should discuss this with the GLA. SB to take an initial seat on the governance board to see how this develops. Another officer may be more suited to this role moving forward.

#### b. **S016 Audit – Scope for collaboration**

John Bryson explained how the WLA Employment and Skills Group and construction industry wanted to explore how sharing S106 commitments subregionally on apprenticeships could be more effective for all parties.

If funding can be found, an audit of borough placements would be sought and reviewed. ABP has completed a similar exercise approx. four years ago. The idea stalled as some boroughs did not consider this an issue.

**ACTION:** AM to locate the original review by ABP and discuss findings with SB and JB.

#### c. **Climate Action** – to be added to next meeting agenda (SB)

An update/presentation from Sarah Dixey on how climate emergency and net zero can be promoted in planning. The document is expected to out for consultation on the 9<sup>th</sup> of Feb and loosely based on Cheltenham’s SPD ([2022\\_03\\_01\\_climate\\_change\\_SPD\\_appendix\\_2\\_draft\\_SPD.pdf \(cheltenham.gov.uk\)](#)). There are also plans to push this further with council web pages.

**ACTION:** ALL, please produce a max 1 side A4 on what your organisation’s plans for climate change/net zero. Before the next meeting. Send to SB.

### 4. Subregional Planning



#### **a. Planning for Waste**

Environment Directors have given their broad approval of ABP's paper on the West London Waste Plan. The WLA have agreed to coordinate the Plan's update and are seeking to move Anthony McNamara into the role.

Details on funding and responsibilities (JD etc from Ealing HR) are expected to be decided in the coming weeks.

#### **b. Joint Evidence Base**

West London Local Area Energy Plan – Report due in March

#### **c. Data Centres and Energy Supply**

TC suggested looking at non-planning fixes in the interim but still lobbying for a solution. The solution needs some leadership and structure, currently it is being championed by a few DM officers.

#### **d. West London Orbital**

Barnet (ABP) taking the lead on the project.

Looking at power supply issues – the Hounslow loop is operating at 98%. This may be a problem for charging the trains' batteries.

Engineering design work is being procured.

Will begin talks with Hounslow and Ealing about level crossings

#### **e. Heathrow Strategic Planning Group**

Funding has improved and some external funding has been received.

Southern and western rail access is to remain on the agenda.

Aims for net zero by 2030 – off setting to play a large role but they are also looking for local projects, six are currently being trialled. Also looking to electric vertical take-off planes to help meet targets.

ULEZ is agitating the transport subgroup

Heathrow to remain a two runway airport until 2030 with ambitions for a third runway in 2050.

### **5. Borough and other Authorities' Updates**

#### **1. Barnet**

Still in EIP mode – hearings finished

#### **2. H&F**

Data housing figures match the GLA. Procuring student housing data.

#### **3. Hounslow**

New planning director, Vincent Lacovara, and new interim planning manager, Ian Gillespie. Climate Change team is currently working with planning on an SPD.

**4. West London Waste**

Waste reforms from government are outstanding, need clarity soon to be ready for changes.

**5. Transport for London**

Sustainable transport – walking and cycling guidance published. [Sustainable Transport, Walking and Cycling guidance | London City Hall](#)

**6. Ealing**

Reg 18 closes on Wednesday, looking at reg 19 by the end of 2023.

**6. Other business – Next meeting**

SB enquired about an 'in person' meeting. General response was for online meetings but an annual in person meeting would be valuable.

END

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## Planning Policy Officers' Group

18<sup>th</sup> May 2023, 2-4.30 pm

Virtual meeting, via MS Teams

### Minutes

#### Attendees

Steve Barton	LB Ealing
Nick Lynch	LB Barnet
Paul Lewin	LB Brent
David Dewar	LB Hounslow
Patrick Clearwater	TfL
David Gawthorpe	LB H&F
Rhian Thomas	LB Hillingdon
Anthony McNamara	WLA
Tom Campbell	LB Hillingdon
Andrew Barry-Purcell	LB Barnet
Michael Thornton	HSPG
Rebecca Yee	LB H&F

#### Apologies

Emma Beal	WLWA
David Hughes	LB Harrow
John Bryson	LB Barnet
Janice Burgess	NH

#### 1. Welcomes, intros, announcements

Previous meeting notes - agreed

#### 2. National Planning Reforms

Technical consultation on the Infrastructure Levy closes on June 9<sup>th</sup>.

#### 3. Regional Planning

##### a. Data hub

GLA met the previous Friday proposing two methods but it looks like some auto-update options may lead to poor quality data.

Starts and completions is up and running

This is the last year for a spreadsheet, hopefully a 'portal' for next year.

Progress is slow but other London boroughs are now joining the conversation.

##### b. S016 Audit – Scope for collaboration

S106 Apprentice & Skills workshop on June 12<sup>th</sup>, in person at Perceval House, Ealing. An agenda has been circulated with these minutes. Please make sure an appropriate borough officer receives the invite.

**ACTION:** Please share any SPDs on S106/CIL employment and training - All

**c. Climate Action**

Presentation on biodiversity from Tom Campbell. Secured £78K from government grants. Looking at fact finding, next steps and viability tests on 10-20 potential schemes.

An ecology expert may be required. Options to share this resource?

London Wildlife Trust was delivering training and more may be available in July.

AM has contacted LWT for details.

Slough has delivered net gain and may be worth contacting for advice.

**4. Subregional Planning**

**a. Planning for Waste**

WLA to circulate paper on costs and timings to chief planners.

**b. Joint Evidence Base**

i. TC Comm, Bus & service – n/a

ii. Energy Supply

Molly Strauss (GLA) has been updating borough officers including environment directors.

**c. Data Centres**

Links to the energy item above.

**d. West London Orbital**

A new PM has been employed, Vrushik Patel. Work continues to complete GRIP 2 by April 2024. Changes to HS2 and terminating at OOC could strengthen the need for the WLO. The Partners' Oversight Group meeting on June 6<sup>th</sup> highlights the need for long term funding and finance to be in place but the start of GRIP 3.

**e. Heathrow Strategic Planning Group**

Government consultation on night time noise closed on May 9<sup>th</sup>.

HAL are launching a major consultation in June on noise action plan, 300k homes.

Discussions on infrastructure continue, still looking for western and southern rail access.

Net Zero – Pioneer Places Project, prizes of up to £1M to address non-technical barriers to net zero.

**5. Borough and other Authorities' Updates**

**1. Barnet**

Examination in public, inspector's report due in Jan. SPDs on hold.

**2. H&F**

Adopted local plan in place, no review planned yet.  
Consultation on climate change SPD till June 8<sup>th</sup>.

**3. Hillingdon**

Local Plan under way, call for sites going out.  
Uxbridge master plan released.

**4. Brent**

SPDs to be adopted: resi amenity space and sustainability  
Church End master plan to be adopted.

**5. Hounslow**

Withdraw and resubmit local plan, some volume 1 elements out of date.

**6. Transport for London**

Local Plan guidance on parking and cycling. Healthy street team will be in touch,  
look out for the email.

**7. Ealing**

Reg 18 – 13,500 responses  
Reg 19 – Jan 2024, submit next spring

**8. Harrow**

Targeting end of 2023 for Regulation 18 consultation.  
Tall Buildings ('Building Heights') SPD consultation closed April. Some issues raised  
by the GLA that are hopefully relatively straight forward to address from an officer  
perspective, but subject to political agreement.

**6. Other business**

City of London have planning advice on suicide prevention at high buildings  
[Preventing suicides in high rise buildings and structures PT 26.04.22.pdf](https://www.cityoflondon.gov.uk/~/media/2022/04/26/Preventing-suicides-in-high-rise-buildings-and-structures-PT-26.04.22.pdf)  
([cityoflondon.gov.uk](https://www.cityoflondon.gov.uk))

Is this an area for wider work. Nick Lynch offered to share a briefing note.

Annual conference 15/16<sup>th</sup> June. A great opportunity for young planners – subsidy  
available!

END

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## Planning Policy Officers' Group

28<sup>th</sup> September 2023, 2-4.30 pm

Virtual meeting, via MS Teams

### Minutes

#### Attendees

Nick Lynch (Chairing)	LB Barnet
Paul Lewin	LB Brent
Michael Thornton	HSPG
Tom Cardis	OPDC
David Hughes	LB Harrow
Tom Campbell	LB Hillingdon
Patrick Clearwater	TfL
Christopher Kirk	LB Hounslow
Sarah Dixey	LB H&F
Majeed Neky	WLA
Anthony McNamara	WLA

#### Apologies

Steve Barton (Chair)	LB Ealing
Emma Beal	WLWA
John Bryson	LB Barnet
Janice Burgess	HE
Mike Anderson	WLA

#### 1. Welcomes, intros, announcements

Previous meeting minutes - agreed but noted that Hillingdon Master Plan will not be published till 2024.

#### 2. National Planning Reforms

Plan-making reforms: consultation on implementation, closes 18<sup>th</sup> October 2023

Link: [Plan-making reforms: consultation on implementation - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/plan-making-reforms-consultation-on-implementation)

No response from boroughs or from the GLA but possibly from OPDC, TCam to share.

#### 3. Regional Planning

##### a. Data hub

The portal is not user friendly and needs more work but on a high level, is going in the right direction if slowly. Should be ready for next year for starts and completions. However, a lower number of S&C are expected due to either or, economic downturn/data compiling issues.

TCam suggested a joint response to the next survey

##### b. S016 Audit – Scope for collaboration – n/a

**c. Climate Action**

Biodiversity net gain – new material due in November, press release contained little detail.

Small sites element and credits still needs resolving.

**d. Cemetery Provision**

DH Asked what other boroughs are doing for infrastructure provision plans, last evidence base is 2011 which identified grave capacity issues. No sign of the GLA resurrecting the data issue.

TCam – Hillingdon have protected all current sites.

**4. Subregional Planning**

**a. Planning for Waste**

Working group has made progress on an agreed approach via a consultants brief which will be presented to Chief Planners on the 12<sup>th</sup> Oct.

Some authorities have requested very minor changes to the MOU. Will for feedback from all authorities and then incorporate the minor changes for signoff.

Two Pos have been received to date – please escalate.

Ealing procurement have been engaged and now we have an indication of our approach will start the procurement process with initial market testing on FTS. OJEU rules no longer apply and we now default to WTO rules.

**b. Joint Evidence Base**

(i) Energy – West London boroughs have agreed to work with LC on the second phase of the energy plan. Chief Execs agreed £25K each contribution to the work which is about to commence.

(ii) Town Centres – We are expecting a presentation from Urban Foresight, the consultancy completing the work. AM will liaise with Sam Cuthbert and update the group in due course.

**c. Data Centres**

Links to the energy item above.

**d. West London Orbital**

A round of borough 1:1 meetings with their finance officers of funding and finance has concluded. As expected, some authorities are better placed than others and other work on finance is continuing.

The technical aspects of the scheme are positive and the scheme remains feasible. Power issues have arisen but can be managed. The Freight timetabling is also favourable.

The final GRIP 2 outputs are expected early 2024 which will include a refresh/update on the figures.



## **e. Heathrow Strategic Planning Group**

New noise action plan submitted and to be implemented Jan 2024.

Heathrow is modernising airspace (gateways/flight paths), 18 month process including a public consultation.

Also looking for permission to alternate direction on the northern runway for wind changes.

Going with a 2 runway model for master planning which includes net zero ambitions and will have a huge demand on electricity, aside of actual planes. Also looking at power networks and even options to create its own power. Meeting to discuss some of this is on the 30<sup>th</sup> October.

No expansion news – new CExec expected.

Net Zero – has some funding for demonstrator projects for non-physical barriers to NZ. Contact Michael Thornton for more information.

## **5. Borough and other Authorities' Updates**

### **1. Barnet**

Received an extensive post hearings letter from the EIP Inspectors and are working through response before resubmission and further shaping of Main Modifications. Although concerns expressed at the number of references, he asked us to make to London Plan policy the Inspector has been generally helpful in suggesting changes and more optimistic about adoption date in Spring 2024 than the Council who think it will be Autumn 2014.

### **2. H&F**

Consulting on Climate Change SPD – high level. 90 consultation points received. Beginning to scope out evidence base for the local plan.

### **3. Hillingdon**

Have backlogs caused by local plan work. Is asking what others do in this situation: consultants, hunker down, reduced service? Majority response was cope as best you can.

### **4. Brent**

Design coding and neighbourhood planning for Staples Corner.

Sudbury is an issues as two opposing groups are seek recognition as the local forum body.

Article 4 – Waiting for class E signoff, not heard back since May.

### **5. Hounslow**

LP withdrawn and resubmitting. Reg 18 in autumn 2023, reg 19 in summer 2024.

Responses on character/design SPD are in and will need time to sift.

Climate change 1<sup>st</sup> consultation complete.

Article 4 small HMO adopted.

### **6. Transport for London**

ULEZ – report on the expansion is due at the end of Oct.

**7. Ealing**

n/a

**8. Harrow**

LP reg 18 early next year, reg 19 at the end of 2024. Hoping to submit by June 2025.  
Tall buildings SPD adopted.

**9. OPDC**

CIL examination ongoing. Started industrial land SPD consultation. Master Plan for  
OPDC West – consulting on soon.  
Dec/Jan – Green space/public realm SPD consultation.

**6. Other business**

MT – Anyone looking at drones? Aerial take-off?

END

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## Planning Policy Officers' Group

1<sup>st</sup> December 2023, 2-4.30 pm

Hybrid meeting, via MS Teams & Perceval House, Ealing

### Minutes

#### Attendees

Steve Barton (C)*	LB Ealing
Paul Lewin	LB Brent
Michael Thornton	HSPG
David Hughes*	LB Harrow
Tom Campbell*	LB Hillingdon
Patrick Clearwater*	TfL
Christopher Kirk	LB Hounslow
Majeed Neky	WLA
Anthony McNamara*	WLA

\* Denotes attendance in person

#### Apologies

Nick Lynch	LB Barnet
John Bryson	LB Barnet
Janice Burgess	HE
Andrew Barry-Purcell	LB Barnet

#### 1. Welcomes, intros, announcements

Previous meeting minutes - agreed.

#### 2. National Planning Reforms

National development policy expected in the new year. Some details starting to trickle out but only just. Hard to see how examination will be faster. Possible the 3<sup>rd</sup> gateway is pointless and the role of Reg19 seems misunderstood. Also many statutory bodies reply late as late as Reg19.

#### 3. Regional Planning

##### a. Data hub

The portal timeline has slipped to make more changes and testing is needed. Huge amount of work to ensure everyone uses it the same way and the guidance notes are not ready.

##### b. S016

Email update from John Bryson:

The last S106 Officers Multiborough Meeting took place on 13 September to discuss opportunities to work collaboratively.

Sharing apprenticeship opportunities was a keen focus of WLA as is reflected in the London Plan, however feedback was that:-

- There would be little appetite from Cllrs to share local opportunities for residents, and
- That we all need to reinforce our processes to ensure that developers are delivering on their commitments and have adequate penalties in place to be able to ensure they comply.

In a follow up meeting on 29 November, we compared apprenticeship cost penalties to developers by all Boroughs (which do vary greatly per Borough).  
Feedback from officers included:

With such low penalties for non-delivery, developers are more likely to cost in a fee to their price than deliver apprenticeships at all.

Many boroughs are reporting that they are not able to achieve fees, nor apprenticeships due to week policy, as is the case for Brent (and other boroughs) even though they have recently updated their SPDs.

We agreed that policy and process will be key to ensure a more consistent approach going forward, working together to help meet the needs of residents and businesses, and developers to meet their obligations. We have begun benchmarking of our methodology for applying policy in s106 agreements. Next steps include:-

- Writing a process for best practice and again sharing across boroughs.
- Seeking clarification from WLA regarding the following:-
  1. Do we all pay WLA for access to Hanlon, if so we could develop good practice using the system to track and monitor developments and for construction and end use jobs brokerage?
  2. Would WLA consider a process mapping exercise with each Borough that matches each Borough's policies around costs that can be placed on developers or better still the whole s106 process?

#### **c. Climate Action**

BNG model is on Exacom

Suggested the evidence base is refined with better monitoring and AI mapping.

Surrey's nature recovery action plan is a good example.

GOV has published guidance for baseline policy work. Some authorities are trying to recruit an ecologist. Ealing going for Exacom and 20% net gain.

#### **d. Cemetery Provision**

Ealing has provision for 6 to 7 years and is looking for new space outside the borough.

Possible collaboration?

Brent has provision for 7 years, some of which is outside the borough.

### **4. Subregional Planning**

#### **a. Planning for Waste**

Consultants brief is almost finished and will go to chief planners for final approval.  
Ealing Cabinet have approved procurement of consultants.  
Still awaiting signed MOUS and PO are also outstanding.

**b. Joint Evidence Base**

- (i) Energy – West London boroughs have agreed to work with LC on the second phase of the energy plan. Chief Execs agreed £25K each contribution to the work which is about to commence.
- (ii) The opportunity for a presentation has passed. Chief planners will be asked for publishing the document.

**c. Data Centres**

Links to the energy item above.

**d. West London Orbital**

A decision on starting GRIP3 will be required in mid 2024. An independent study on the benefits of the scheme is being commissioned so boroughs can make fully informed decisions. The study will include options for financial contributions. GRIP2 outputs are expected in early 2024 and will inform the benefits study.

**e. Heathrow Strategic Planning Group**

A lot of work going on behind the scenes but cannot say more at the moment.

Looking at energy planning and increasing demand at the airport.

A master planning update is due in early 2024.

Air Space change is in progress, there is pushback from the CAA and London may need/want a single design system.

Noise action plan is still awaiting a response from Defra.

Passenger numbers now much the same as pre-pandemic

**f. GTANA**

Concerns about targets definition. [SB] Project was poorly managed and datasets may have errors. [CK] Not clear about site assessments - PPTS definitions differences and are awaiting responses/update.

**ACTION: TC to draft a Response**

**5. Borough and other Authorities' Updates**

**1. Barnet**

None

**2. H&F**

None

**3. Hillingdon**

Reg18 in March, CIL consultation also in March.

**4. Brent**

Staples Corner master plan turning into a SPD. Issues continue in Sudbury over neighbourhood forums. A4 still waiting on SoS. Looking at a character assessment but no consultant.

**5. Hounslow**

Reg18 site allocation etc, all in one. Closes Dec 17<sup>th</sup>. Reg 19 in summer 2024.

**6. Transport for London**

Cycle parking guidance updated, is due after the election.

**7. Ealing**

Conservation area consultations going on. Getting ready for Reg19 in Feb 2024. Draft CIL charging consultation in early 2024.

**8. Harrow**

LP reg 18 early next year, reg 19 at the end of 2024. Hoping to submit by June 2025.

**9. OPDC**

CIL hearing next week. Adopted industrial SPD. Local Plan review – under new rules.

**6. Other business**

None

END

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## Planning Policy Officers' Group

16<sup>th</sup> May 2024, 2-4.30 pm

Perceval House , Ealing and virtually, via MS Teams

### Minutes

#### Attendees

Steve Barton (C)*	LB Ealing
Renato Messere*	LB Harrow
David Hughes*	LB Harrow
Nick Lynch	LB Barnet
Lauren Laviniere	OPDC
Ethan Cameron	TfL
Paul Lewin	LB Brent
Anthony McNamara*	WLA
Tom Campbell	LB Hillingdon
Andrew Barry-Purcell	LB Barnet

\*Denotes in person attendance

#### Apologies

Alison Bradshaw	TfL
Christopher Kirk	LB Hounslow
Tom Cardis	OPDC
Michael Thornton	HSPG

#### 1. Welcomes, intros, announcements

Previous meeting notes - agreed

#### 2. National Planning Reforms

Update on the Levelling Up and Regeneration Act 2023

DLUHC wants to understand the impact that its Digital Planning Programme has had so has commissioned RSM UK Consulting and PUBLIC to undertake a monitoring and evaluation exercise. The programme's evaluation page can be viewed [here](#) if you would like to find out more, and the link to a survey will be available via the evaluation page from 7 May 2024Reminder to complete .

#### 3. Regional Planning

- a. London Plan – Jules Pipe, Where do we go from here?  
Housing remains a priority as well as brownfield sites. No clear news on greenbelt and no news on timing of a review. There will not be an update to the mayor's transport strategy.

##### b. GTANA

Who is confident with the figures? 4 boroughs confused, 1 not happy.  
Poor feedback from GLA and consultants on this work. Not clear where they have surveyed and most data is aggravated and therefore cannot be interrogated.



**ACTION** TC and SB to arrange a meeting with GLA.

**c. Data Hub**

The portal works for Hillingdon but with some mis-categorisation. Eg. Un/decided flags are missed and not updated. Regular meetings have concluded. Harrow are using it but not happy.

Brent/Ealing are worrying about older data issues.

**d. SFRA**

Level 1 – Brent are hosting. Costs are about £1120 per year.

PL needs a timescale for hosting. Look to extend for as long as possible.

Need to have Metis update hosted maps.

Hillingdon have a separate contract with Metis.

Flood zone 3b may have issues. Stage 2 requirement - up to each LPA.

**ACTION:** PL to double check to costs/status with Metis

**4. Subregional Planning**

**a. Planning for Waste**

Procurement has started. Initial feedback looks like a very small number of bidders will respond. The WLWP working group has been briefed on next steps and dates for bid scoring and interviews. Hope to commission in July.

**b. Joint Evidence Base**

n/a

**c. Data Centres and Energy Supply**

GLA continue to work with DNO and developers to maximise the delivery of power and apply a ramping delivery for 1MVA per year where necessary. The WLA has now employed a Net Zero Officer who will work more closely with the GLA. Long term issues remain a critical issue. The WLA is talking to the National Infrastructure Commission who have begun to survey the issues.

**d. West London Orbital**

GRIP2 engineering is coming to a close and looks good. Cost estimates to follow and indications are better than expected.

Modelling issues have cropped up and need checking for coding errors which will mean some reruns are required. Results expected in late July/early Aug.

A decision on GRIP3 will be required by the end of the summer. The Benefits Report will be circulated in July so boroughs can consider their options.

**e. Heathrow Strategic Planning Group**

n/a

**f. Cemetery Capacity**

Harrow are almost full and need solutions quickly.

Ealing have capacity for 7 years

Is there interest/value in a joint review?

**5. Borough and other Authorities' Updates**

**1. Barnet**

Inspector's report due in October

**2. Brent**

Staples Corner master plan consultation in June

**3. H&F**

**4. Harrow**

Reg 18 done! DtC meeting done – many thanks.

**5. Hounslow**

**6. West London Waste**

**7. Transport for London**

New tool for PTAL, compliment access through public transport and walking

**8. Hillingdon**

Reg 18 out, CIL review launching soon.

**9. Ealing**

Reg 18 done, 650 responses, CIL consulted. Using an independent examiner.

**10. OPDC**

CIL updated. Public realm and green infrastructure up for adoption.

END

## Planning Policy Officers' Group

19<sup>th</sup> September 2024, 2-4.30 pm

MS Teams

### Minutes

#### Attendees

Steve Barton (C)*	LB Ealing
Callum Sayers	LB Harrow
David Gawthorpe	LB H&F
Nick Lynch	LB Barnet
Peter Farnham	OPDC
Paul Lewin	LB Brent
Anthony McNamara	WLA
Tom Campbell	LB Hillingdon
Michael Thornton	HSPG
Sarah Dixey	LB H&F
Dyal Ravneet	LB Hounslow
Duncan McKane	LB Hounslow

#### Apologies

David Hughes	LB Harrow
Christopher Kirk	LB Hounslow
Patrick Clearwater	TfL

#### 1. Welcomes, intros, announcements

Previous meeting notes - agreed, actions completed

#### 2. National Planning Reforms

##### a. Revisions to the NPPF

**ACTION** – Steve Barton to share final draft of the Planning Officers Society response. Footnote 12! Housing supply targets to 2026. Consultation papers were muddles making responses difficult.

Most likely the standard method will be used for housing numbers.

SHLAA – Call for sites has opened up.

We should expect a debate on small sites. Consider looking at the Croydon example.

['Windfall' or Small Sites Evidence Base - Croydon Local Plan Issues and Options 2019](#)

Green Belt/MOL

May encourage development in the wrong places. May have to have some release to realise targets. MOL possibly more valuable on London.

GLA – not sounding like a GLA Green Belt review is likely.

Good news on strategic planning but light on detail. Not much to help 'other' region types such as the Heathrow area as opposed to mayoral regions. Support for host authorities of DCOs and NSIPs and their neighbours could be better.

Response deadline: 24<sup>th</sup> September

### 3. Regional Planning

- a. London Plan Review - Recent SHLAA event suggested nothing new. Simple Digital SHLAA – easier to use, can feedback on how to improve and build on. Expect some teething issues.

GLA sent out a comms pack – Hillingdon are not publicising this and will work on it themselves.

GLA Local Plan Comms Team has improved. Hounslow have a meeting scheduled soon, meetings for other boroughs are being lined up.

- b. **GTANA**

Met with GLA and frustrations were vented. It was acknowledged that the consultants had not performed well.

Note, west London was not on the steering group.

GLA are not committed to redoing this work but will not publish it without notifying authorities first.

Concerns remain over the data and poor quality of work.

- c. **Data Hub**

Using Option 1 s(GLA automated) seems to miss sites. Using Option 2 will list many more sites than option 1. The GLA will update the figures if you show them the proof.

H&F sent a spreadsheet as uploading was so painful. Watch out for automatic lapses after three years. Losses are counted on commencement not completion, you will always be behind because of this change. It is suspected that user groups have now been dissolved.

- d. **SFRA**

Metis have been issued with a purchase order and an agreement for the next two years has been reached. Brent will be asking for Pos to cover the costs, expected at £1065 per authority.

There are some data issues remaining as the allotted hours for updating have been spent for this year. An agreement is needed on updates/changes.

EA told Hounslow to update as part of Reg 18.

**ACTION** - Metis to attend the next meeting

### 4. Subregional Planning

- a. **Planning for Waste**

WLWP inception meeting with LPAs and BPP/LUC is 23<sup>rd</sup> September. Contract wording has now been agreed and will be signed in the next two weeks. A change to the format of the bid. BPP are now a single supplier with LUC and Metis as subcontractors. There are no changes to the costs or work packages.

Following the inception meeting a revised timetable will be circulated.

East London Waste Plan went to Reg 18 over the summer. While we missed the deadline to respond, I am starting a conversation about their abundance of waste sites and have asked if they could delay any decisions until we have concluded our needs based assessment later this year. If we don't have sufficient sites we may have to have a conversation with the east.

#### **b. West London Orbital**

The circulation of the GRIP2 and benefits pack has been delayed due to the TfL cyber attack. In addition, Barnet have asked for the Partners Oversight Group meeting to be rescheduled for after the Budget as there could be some news on council tax.

The pack will now be circulated mid October. It is long but comprehensive and transparent. We expect you may be quizzed on the content by directors/members.

#### **c. Heathrow Strategic Planning Group**

There will be a conference event on October 11<sup>th</sup> covering various issues, six different session inc sustainable growth etc. It will be an all day event.

There will be a planning application for work to enable easterly operations of the northern runway. Other associated applications should follow. Hoping to implement by 2028.

City of London have permission to increase passenger numbers. Luton and Gatwick decisions on expansion are due in early 2025.

Future growth at Heathrow is a bit of an unknown, some mixed messaging from Government and Heathrow.

#### **d. Cemetery Capacity**

Harrow Brent and Ealing have met to discuss options, there is a lot of work to do. Other authorities are invited to get involved.

### **5. Borough and other Authorities' Updates**

#### **1. Barnet**

Awaiting inspector's report, expecting a sound reply.

**2. Brent**

Residential extensions SPD, a refresh of the 2018 version.

**3. H&F**

Local development scheme going to Cabinet, looking to adopt in 2027, including SPDs on LDO and LLBCO for solar panels.

**4. Harrow**

Reg 18 finished, 1200 responses. Preparing Reg 19.

**5. Hounslow**

Reg 19 launched.

**6. West London Waste** n/a

**7. Transport for London** n/a

**8. Hillingdon** n/a

**9. Ealing**

Reg 19 done, now processing – 640 responses. Looking to adopt the draft CIL charging schedule in 2025.

**10. OPDC**

Public realm SPD adopted in June.

END

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## Planning Policy Officers' Group

21<sup>st</sup> November 2024, 2-4.30 pm

Perceval House Ealing and MS Teams

### Minutes

#### Attendees

Steve Barton (C)*	LB Ealing
David Dewar	LB Hounslow
Andrew Barry-Purcell	LB Barnet
Peter Farnham	OPDC
Paul Lewin*	LB Brent
Anthony McNamara*	WLA
Tom Campbell	LB Hillingdon
Yvonne Sampoh	LB Barnet
Mohammed Azram	LB Harrow
Brianne Stolper	LB Ealing
Sarah Dixey	LB H&F
Patrick Clearwater	TfL
Michael Thornton	HSPG

\* In Person

#### Apologies

Nick Lynch	LB Barnet
Janice Burgess	Nat. Highways
David Hughes	LB Harrow

#### 1. Welcomes, intros, announcements

Previous meeting notes - agreed, actions completed

#### 2. National Planning Reforms

##### a. Revisions to the NPPF

No news on when guidance will be released, there has been an upturn in Ealing and Slough for pre-app for data centres. Data centres being mentioned in the General Election. This potentially ties up with 'grey belt' notions.

#### 3. Regional Planning

##### a. London Plan

A paper from the GLA is expected in the new year. London Plan will be a full review not alterations with housing numbers forcing the issue. Expecting an increased housing target for London, awaiting details on the distribution of the targets. London Plan needs to be published by March 2026 – Local elections. There is a potential gap between the NPPF and London Plan and issues over what targets to use.

SHLAA – are your digital layers correct? Ealing discovered some errors at the GLA end. The SLHAA can be poorly run, don't assume it is correct.

Small Sites – Previous work by ABP very helpful in previous discussions. Croydon have some good work on small sites, shall we ask them to present to us?

#### **b. GTANA**

No news from the GLA. The GLA have agreed the report is not good but will not revisit it. They also said they would not publish it until the boroughs are happy. It is unclear what the next steps will be and when. Is there any benefit/value in completing a West London study?

#### **c. Data Hub**

Everyone has submitted. The Q&A response has opened up for feedback. Generally felt not to be a good experience – time consuming, no confidence that it works. Also issues on the boundary with the OPDC. It may also count losses before demolition while not counting replacement units.

#### **d. SFRA**

Hosting has been extended for three years. £5k per borough, please send Paul Lewin a PO, Barnet too please.

SFRA thought to be a good piece of work but Metis have expressed some caution.

### **4. Subregional Planning**

#### **a. Planning for Waste**

The Waste Plan working group have met with the GLA and separately with the East London Waste Planning Group.

There are several issues to address: Timing of the London Plan will affect the programme schedule and potentially cause a late submission. Five of the Seven authorities are seeking to release sites, causing potential for negotiation, I turn adding to delays. Also local elections in 2026 may affect the plan. Deadline for submission is Dec 2026. Aiming for Reg 18 in Nov 2025.

#### **b. West London Orbital**

We have had borough 1:1 meetings to take stock of each borough's stance on the WLO – it remains positive. Each borough wants the scheme to progress but difficulties around funding the next stage of work have not yet been overcome. We are discussing this with TfL to see how much flexibility there is over the timing of borough contributions.

The Partners Oversight Group are due to meet on December 9<sup>th</sup>.



### c. Heathrow Strategic Planning Group

Working on a planning app for north runway easterly orientation – 20<sup>th</sup> Jan is the consultation deadline. It includes more taxi ways and an acoustics wall. Air space implications are a separate matter to this app.

The noise action plan has been signed off by DEFRA. Gov has signed off the shareholder change – now a big Saudi interest.

Michael Thornton looking to reduce his input (not retiring, yet) and Adrian Colwell will be more involved.

### d. Cemetery Capacity

No update

## 5. Borough and other Authorities' Updates

### 1. Barnet

Inspector's report [Barnet Local Plan review: examination in public | Barnet Council](#)

### 2. Brent

Staples Corner Master Plan adopted

Looking at a growth bid for local plan review, funding an issue.

### 3. H&F

Local development scheme published online, inc evidence base.

Community involvement published

Reg 18 in spring 2025

A4 Dir. Calss E in town centres needs internal sealing

### 4. Harrow

Reg 19 closes in Dec.

### 5. Hounslow

70 responses from Reg 19, prepping for submission in early 2025.

A4 dir. PD in town centre and employment centres – MHCLG no response.

Proposing some green bely release – GLA not objecting if exceptional circumstance demonstrated.

### 6. West London Waste n/a

### 7. Transport for London

LP guidance on parking is paused. Funding settlements were considered good.

### 8. Hillingdon

Reg 19 in early 2025

A4 Dir. Signed off for HMO.

**9. Ealing**

Reg 22 submitted! CIL consultation ended, A4 on HMO out to consultation.

**10. OPDC**

Dame Karen Buck to be the new Chair

Early scoping on LP review

**Next meetings**

Feb 27<sup>th</sup>

May 22<sup>nd</sup>

September 25<sup>th</sup>

December 11th – In person

END

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DRAFT

# West London Alliance

## Planning Policy Officers' Group

Thursday 27th February 2025

Time: 2.00pm to 4.30 pm

On MS Teams Only – Appointment Sent Separately

## Minutes and Chair's Notes

### Attendees

Steve Barton (C)	LB Ealing
Anthony McNamara	WLA
Hilary Seaton	LB Brent
Adrian Colwell	HSPG
Paul Clark	LB Barnet
Nick Lynch	LB Barnet
Peter Farnham	OPDC
David Dewar	LB Hounslow
Tom Campbell	LB Hillingdon
David Hughes (VC)	LB Harrow
Patrick Clearwater	TfL

### Apologies

Paul Lewin – LB Brent

## Chair's Notes, *minutes in italics*

### 1. Welcome/Notes of Previous Meeting

#### 1. a) Nick Lynch, LB Barnet

To note that this will unfortunately for us but perhaps fortunately for Nick, will be his last meeting! He is retiring from the beginning of April. As a veteran Planning Policy Manager he is going to sorely missed not only in Barnet but as a stalwart of this group. Express thanks and gratitude on behalf of the Group.

A consequence of this is that one of the most important jobs in West London now becomes vacant.

#### 1. b) Welcome Adrian Colwell from HSPG

To note that Michael Thornton has now formally stepped away and is on the next stage of his journey towards full retirement. In his place, can I formally welcome Adrian Colwell - who is a consultant specialising in strategic land use planning and growth strategies. He has led Local Plan preparation including the Oxfordshire 2050 Plan. He has been 'Executive Director for Place and Growth' across 2 Councils, Special Adviser to the First Minister of Scotland (2001-2007) & worked in the European Parliament, House of Commons and US House of Representatives. Adrian has also published extensively and presented evidence to Parliamentary enquiries by the Scottish & European Parliaments, Select Committees of the House of Commons & House of Lords.

Adrian has now joined the HSPG Secretariat, and his main area of interest will be spatial planning and helping with a refresh of the Joint Spatial Planning Framework. I am sure he will be an invaluable addition to our WL family!

## 1. c) Introductions -

## 1. d) Notes of previous meeting held on 21<sup>st</sup> November 2024 (draft previously circulated, final notes to follow)

### ***New Vice Chair***

*David Hughes, of LB Harrow, was nominated by SB and seconded by TC. No other candidates were announced and all agreed DH for Vice Chair.*

## 2. National planning reforms

**a) Emerging proposals for strategic planning. See attached slides by Catriona Riddell from the POS Joint Network Conference on 25th January 2025 and Govt has published its long-awaited devo proposals.**

Research was commissioned by the RTPI and has been carried out by the University of the West of England (UWE), together with Catriona Riddell Associates and Richard Wood Associates makes the case for strategic planning:

- 96% of respondents either strongly agreed or agreed a change to the current approach to strategic planning is needed.
- There was thus an exceptionally strong majority in favour of strategic planning being mandated by government with 80% of local authority survey respondents and 88% of non-local authority respondents in favour.

Points made at a recent POS Joint Network event on January 24<sup>th</sup> attended by Joanna Aveley and Catriona Riddell

- Strategic plans provide long term spatial investment frameworks that help ensure that cross LPA boundary issues are addressed effectively. Strategic plans are not 'big local plans'.
- Spatial Development Strategies (SDS) will be the new strategic planning model. SDS will be high level frameworks with clear links to other plans and strategies e.g. local growth plans, local transport plans, local nature recovery strategies but also to national priorities / infrastructure – they won't allocate sites and won't be based on the London or the Greater Manchester models.
- MHCLG are working on a specimen SDS and modelling how it might be examined in a joint exercise involving PINs. Looking to reduce the amount of evidence that is required e.g. viability assessment.
- The advent of NDMPs means that strategic plans (and indeed Local Plans) are expected to be much shorter, more 'high level' documents.

- Whilst I think NDMPs are good in principle the ‘devil is in the detail’ and efforts to get an assurance that LPAs could set local policies, where the evidence supports it, went unanswered.
- Geography will be dictated by devolution, but no firm plans/model exist yet. Assurances that non-stat frameworks, like that produced for Heathrow, will continue to play an important role.
- Housing targets set through standard method will be amalgamated to SDS scale with SPA responsible for distribution to LPAs.
- No plans to row back on supplementary plans being treated like DPDs.
- Whilst a plethora of initiatives were highlighted there was still no assurances given on ringfencing LPA funding. To this end, POS have now published a response to Local Authority Funding Reform consultation (on Feb 11<sup>th</sup>) together with a new manifesto calling for LPAs to be properly funded.

## b) Other national planning issues

**New Funding To Support Local Plans at Reg 18 stage: but tight timetable as EOT by 28th February 2025. See: Start or continue an application for local plan funding (Regulation 18)** – not sure this benefits many in the room, but worth a shout. WLWP doesn’t meet the criteria, but Anthony and I decided worth a punt anyway.

**MHCLG has now published the findings of its first annual survey of local authority planning capacity and skills. See: Local Authority Planning Capacity and Skills Survey 2023 - Survey report** – No real surprises but the stats are stark nonetheless. Mirrors study last year conducted by POS. Some highlights:

- 97% of planning departments reported some planning skills gaps. Planning departments’ short-term strategies to address capacity and skills gap issues relied heavily on outsourcing.
- Planning departments were more likely to report that the number of staff had decreased (38%) than increased (17%). Two in three (66%) expected that the current number of posts would remain the same in the next financial year, with 20% expecting an increase.
- 91% reported some difficulty with recruitment.
- 34% reported difficulties in filling senior-level policy vacancies.
- 52% reported using agency staff and contractors to fill unfilled vacancies.
- The most commonly reported gaps were in ecology and biodiversity (72%) and master planning and design codes (63%), with over half reporting gaps in urban design and architecture (54%).
- One in four planning departments reported vacancies in the following specialisms: heritage and conservation, monitoring, and the CIL
- Local Plans were often mentioned as a major call on resources. 41% of planning departments reported that skills gaps had an impact on preparing or adapting the Local Plan.

**Pathways to Planning: EOT by 21 March 2025 to express for a salary bursary** – To note and for information. This is a graduate recruitment programme run by the LGA which delivered more than 80 new planners to almost 60 local planning authorities in its first year. The next cohort aims to shortlist a pool of candidates for a September 2025 start.

**Planning and Hydrogen:** – To note and for information. This is a personal hobby horse of mine and follows exposure at a recent POS event.

## 3. Regional Planning

### 3 a) Review of the London Plan

On 18<sup>th</sup> December 2024, the London Plan team hosted a meeting on the review process. Key points raised included:

- It was confirmed that the housing supply targets in the current London Plan will continue to apply for London LPAs subject to the NPPF transitional arrangements which means they would technically expire on 4<sup>th</sup> March 2026. GLA are lobbying for this to be extended up until adoption of the new London Plan and boroughs are encouraged to do likewise.
- The aggregate new London Plan housing supply target will be an aggregate of the standard method of all London boroughs which equates to approximately 88K new homes pa or 880K over ten years. This has been accepted and will not be challenged. However, it was noted that achieving this target would be challenging.
- {Interesting fact: more recently Lucinda Turner said it took 32 years to deliver 880K new homes in London previously and we are now expected to do the same in 10 years!}
- A dose of realism was needed and that it would depend in part on delivering certain critical infrastructure projects with Bakerloo and DLR extensions mentioned. However, worryingly WLOR was not mentioned despite a prompt from me (more on that later though!).
- Therefore, new housing targets in the London Plan will be 'stepped' i.e. not a single target for each LPA. This will take account of any critical infrastructure so that a higher target only takes effect if that infrastructure scheme is taken forward. To do otherwise would mean LPAs would have elevated targets which would not be achievable unless the infrastructure is delivered. This seems sensible and pragmatic.
- A 'call for unity' was made on this as it would be absurd if some LPAs opted to adopt the standard method figure for their area rather than taking a collegiate approach based on London wide capacity and its redistribution.
- It was noted that 300K homes had planning permission in London already but have not been built. Acknowledged there is a difference between approvals and completions. Unclear whether this means approvals will count rather than completions but seems at odds with the Housing Delivery Test.
- Some work was being done on barriers to delivery noting in particular absorption rates, the need to diversify the housebuilding market and the importance of infrastructure to unlock potential sites/optimize delivery.
- A 'brownfield first' approach will continue to be taken but this will probably not reach the intended aggregate London wide target.
- Bombshell!! There will be a London wide Green Belt review predicated on how much release may be required to meet the shortfall. A bid for grant funding from govt was made to help facilitate this (and joint support was subsequently received from the majority of London LPAs).
- This review will not include MOL and the new London Plan will not advocate MOL release and will make clear a policy distinction.
- Proposals for urban extensions and or new towns are also being prepared and GLA have been in contact with the New Towns Commission. Up to four sites for new towns are being actively considered and the GLA will be in contact with affected LPAs early in the new year to discuss any implications (led by Deputy Mayor, Jules Pipe). Some initial capacity modelling has already been undertaken.

Regards the timetable:

- Feb 25 – meeting with LPAs to discuss emerging draft of a high-level public facing document that will foretell proposed changes to the London Plan and ensure no surprises for LPAs. Ealing had a meeting set up, but it was cancelled by the GLA. Did anyone else meet them?
- Mar 25 – publication of high-level document (since delayed to April?). It will outline; "the tough choices to be made and the available policy options including potential sources of development capacity and what infrastructure will be required." It will not cover all subject areas but will identify implications for DM and what elements will be left for LPAs to deliver. It will not include housing supply targets at this stage. It will propose a new style of policy writing. It will also include proposals for new towns in London's Green Belt, as yet unidentified.

- End April 25 – first set of policy options to be shared with initial viability testing.
- June 25 – housing supply targets will be shared for each LPA
- Aug 25 – final viability testing.
- Nov 25 – draft London Plan ready and to be in the public domain by March 1<sup>st</sup>, 2026, at the very latest.

Comments or reaction?

*DD Met GLA following Reg19, Green Belt release for Ind land was not an issue.*

*DD – Politics is an influence. IT issues are always present. Planning apprentices are going well.*

*Guidance on make assessments on Green Belt would be good. Should parcels of land be included?*

*TC – Should we have a subregional approach to Green Belt review?*

*SB Can convene a special group if needed.*

*TC – Have concerns over the time/quality of the review and wants to know the methodology.*

*SB - Notes MOL not in the scope of the review.*

*DD – GLA seeking more Green Belt release from Enfield in their LP.*

### 3 b) London Plan Evidence Base

- SHLAA
- Green Belt Review
- New Towns
- London Employment Sites Database and Town Centres/High Streets Research
- GTANA

*SB – due to time constraints, Green Belt/SHLAA, housing targets may be imposed on us without a proper conversation.*

### 3 c) Issues with GLA London Datahub

### 3 d) Any other regional planning issues

## 4. Sub-Regional Planning

### 4 a) Joint West London Waste Plan

- Update including meeting held on 17<sup>th</sup> February 2025. Key points:
  - People found the meeting with BPP quite frustrating because of the lateness that documents were sent out, and some people didn't receive any documents at all. **Action:** I have subsequently (re) sent the following documents to everyone: WLWP Site Safeguarding Approach v 1.0 draft; WLWP25 Proposed Site Assessment Methodology CR v 1.0; WLWP Progress Meeting 2 Action Points
  - People were annoyed and disturbed by the arguing/discussion between the Alan Potter (the consultant) and Peter Tilson (WLWA) from WLWA. The discussions should have moved to offline.
  - Letter/Survey to Operators – need clarity on when comments on the letter/survey are required and who will actually be sending out the letters? The WLWP website is mentioned in the letter and the website no longer exists. A new website needs to be set up. Is this going to be a stand alone website or can it be hosted on one of the LPAs' websites? A dedicated email address for the WLWP also needs setting up? The letter shouldn't be sent out until the website is sorted out and an email address.

- LDS – this needs to be consistent for all LPAs – some have deadlines for their LDS looming in the next few days – emails have been going back and forth today since our meeting in this regard. No one is clear as to whether the current timetable is predicated on having site assessments or not? If no site assessments are needed, how will the timetable change? Assumptions are that **Reg 18 with assessments** would be November 2025 and **without assessments**, September 2025. Local elections need to be factored in too. All this needs to be checked with BPP.
- 
- Planned meeting on 10<sup>th</sup> March 2025, 3-5pm on MS Teams.

#### 4 b) Joint Evidence Base

- Nothing else to report.

#### 4 c) West London Orbital

- Include update on workshop held on 14<sup>th</sup> February 2025. Updates by Anthony and Andrew Barry Purcell.

*AM – Summary of the current position is that the scheme is physically deliverable and while there are challenges, such as level crossings, they can all be resolved. Network Rail have also indicated they have no objection to the scheme going forward.*

*Funding for the scheme is coming on. Two boroughs have identified funding for the next stage of work (GRIP 3) and we expect the remaining authorities to contribute shortly. TfL will be paying for 50% of the GRIP 3 costs. Total GRIP 3 cost is estimated at £6.65million.*

*TfL hosted a workshop at Palestra on February 14<sup>th</sup> looking at the economic, homes and transport benefits the scheme can support. The aim of the session was to identify benefits that may have been overlooked and further opportunities that have not yet been considered.*

*Feedback from the attendees was that the workshop was very rewarding and useful.*

#### 4 d) Heathrow Strategic Planning Group

- Update by Adrian Colwell.  
*HAL to respond to expansion offer by June 2025. Possibly a 3<sup>rd</sup> runway by 2035. HSPG are liaising with stakeholders. DCO process will take 15 months. Recent changes to DCOs mean a streamlined consultation and some protection from judicial reviews.*

*AM – resources required by LAs to review material from HAL is overwhelming. Assistance will be needed.*

#### 4 e) Cemetery Planning

- Update. Note SOCG agreed between Harrow, Brent and Ealing. The three boroughs have agreed to work together to address this issue.

*SB – A statement of common ground has been agreed with Ealing and Harrow. GLA are auditing existing and future capacity – expected Autumn 2025*



## 5. Borough and Other Authority Updates

### 5 a) Boroughs - Local plans/supplementary documents/CIL/article 4 directions/neighbourhood plans

- Barnet – *LP adopted last week, working on LDS*
- Brent – *SPDs adopted for Staples Corner design guide and master plan*
- H&F – *n/a*
- Harrow – *LP submitted, awaiting inspector.*
- Hillingdon – *Need to do a CIL review and HMO review*
- Hounslow – *Working on Reg19 responses and LDS. Also looking at SPDs on HMOs and affordable workspace*
- Ealing – *LP submitted in November 2024, working through initial questions, hearings in June. CIL public hearings not scheduled yet*

### 5 b) Old Oak/Park Royal MDC Update

*PF – Scoping for local plan, will start next year*

### 5 c) Transport for London Update

*PC – New cycle parking standards coming, Webcat being updated and MTS will not be updated but expect some changes.*

### 5 d) West London Waste Authority

*n/a*

### 5 e) Other updates:

- **POS Policy Forum:** Tomorrow Friday 28 February 2025. 9:30am – 11:30am. Virtual meeting. Agenda items include national infrastructure projects and the devolution white paper. Contact the Chair for more details and or link to join on MS Teams.
- **POS Spatial Plans Network:** Thursday 27th March 2025. 10am-Noon. Virtual meeting. Agenda items include Housing Delivery Test and Housing Action Plans with case studies. Contact the Chair for more details and or link to join.
- **POS Annual Conference:** 12th-13th June in Hertsmere. Save the date!

## 6. Dates of next meeting:

- 22nd May 2025 on MS: Teams at 2pm
- 25th September 2025: on MS Teams at 2pm
- 11th December 2025: a Hybrid meeting In Person/MS teams at Ealing Council at 2pm and drinks afterwards!
- Add a social after Easter using Nick's leaving as a possible excuse?

# West London Alliance

## Planning Policy Officers' Group

Thursday 22<sup>nd</sup> May 2025  
Time: 2.00pm to 4.30 pm

On MS Teams Only – Appointment Sent Separately

## Minutes

### Attendees

Steve Barton (C)	LB Ealing
Paul Lewin	LB Brent
Anthony McNamara	WLA
Peter Farnham	OPDC
Patrick Clearwater	TfL
Callum Sayers	LB Harrow

### Apologies

Andrew Barry-Purssell	LB Barnet
David Hughes (VC)	LB Harrow
David Dewar	LB Hounslow
Adrian Colewell	HSPG

## 1. Welcome/Notes of Previous Meeting

### 1. Welcome and intros

1. Notes of previous meeting held on 27<sup>th</sup> February 2025 (draft previously circulated, final notes to follow)

## 2. National planning reforms

### a) Planning and Infrastructure Bill

Links to the Bill and other supporting links:

- [Guide to the Bill](#)
- a series of [factsheets](#)
- [the explanatory notes](#)

In addition, there is a briefing document from Sharpe Pritchard circulated with the minutes.

*No further discussion*

## **b) Other national planning issues**

SPDs are to be replaced by Supplementary Plans which will require consultation and a more formal examination. Details have not been released yet. Local Development Orders might work as an alternative.

The Planning Officers Society have been working on Local Development Orders, see the guidance here: [Local Development Orders and Their Practical Implementation](#)

## **3. Regional Planning**

### **3 a) Review of the London Plan**

Steve Barton sent an email summarising key points which are in the appendix.

The GLA will distribute housing targets amongst the authorities so your standard method figure will probably change. Greatest need is for social rent homes which could have targets of their own. There is currently a slow down in delivery across the subregion (possibly due to building safety) so the 88,000 homes is a huge challenge. Too many apps coming through for co-living.

Andrew Barry-Purcell commented by email, that he welcomed

- Recognition of the importance of the West London Orbital
- An indication of some pragmatism on cycle parking standards
- The need to link investment in public transport to releasing growth

But transport LIPS (1-3 years) are out of sync with local plans (5 years) and much is in the gift of TfL. He would like to see the Mayor leading an inter-regional discussion with authorities on the Greater London boundary on industrial land, particularly logistics. Lastly, The London Plan – and TfL's investment plans – should reflect the potential implications for public transport investment of having more growth on the urban fringe.

The examination period could be very long if there won't be a stage two draft.

There was discussion on excessive policies within the current plan and building reg failure (hot food takeaway as an example) and how the London Plan team will move forward without knowing what the National Development Management Policy will say.

### **ACTION**

There is a short window for a West London response.

Please bullet your comments and send to Paul Lewin [Paul.Lewin@brent.gov.uk](mailto:Paul.Lewin@brent.gov.uk) copying in Anthony McNamara [mcnamaraa@ealing.gov.uk](mailto:mcnamaraa@ealing.gov.uk)

Paul will collate your responses and Anthony will attempt to seek subregional signoff through the strategic directors on June 12<sup>th</sup>.

### **3 b) London wide GTANA update**

LB will be writing to some London boroughs soon looking for additional space. The Chair thought this most unlikely

### **3 c) Issues with the GLA Datahub**

Nothing to report

### **3 d) Strategic Flood Risk Assessment Hosting**

Paul Lewin to review and report at the next PPOG meeting. In the meantime, please make sure you have sent your PO to Paul.

## **4. Sub-Regional Planning**

### **4 a) Joint West London Waste Plan**

Boroughs have compiled a Capacity Model which shows 10% headroom with regard to apportionments – this may not be sufficient to proceed to examination. The biggest capacity loss is from the Western International Market but further capacity reduction may come from the WLWA who state that more space is required for recycling and separation of materials. A meeting is being arranged with the WLWA to confirm their position.

The East London Joint Waste Planning Group have begun Reg19 and have a large surplus in capacity. Discussion with East London will be arranged to see if we can rely on their surplus capacity.

If a call for sites is required, we will not be able to submit our plan before December 2026 and we will need to devise a new approach for our Waste Plan. There will also be local elections and changes in the London Plan to accommodate. This may also cause delays which increase the risk of missing the submission deadline.

Priority is to agree the west London capacity, meet with the East London boroughs and WLWA and seek a decision from the Chief Planners.

Work to prepare a draft is in progress. Other considerations is how much waste management (circular economy, reuse, internet of things etc) should be included or left to individual local plans.

SB commented that settling the capacity issue was the priority and getting members involved was not urgent until technical issues resolved.

### **4 b) Joint Evidence Base**

- Nothing to report.

### **4 c) West London Orbital**

GRIP 2 is complete but some of the AECOM modelling contained anomalies that were contrary to known outcomes. TfL have since undertaken a review and initial reruns have shown a marked improvement. Outcomes are expected to be shared in June 2025.

The WLO Working Group has been expanded to include senior officers from each of the authorities involved and meet when needed.

Current work is to agree a spec for a Growth Study, an updated narrative on the potential for growth along the WLO corridor.

All authorities, except LB Ealing, have committed funding for the next stage of work, PACE ES3, and an response from Ealing is needed soon.

#### **4 d) Heathrow Strategic Planning Group**

HSPG have begun working on an Outcome Statement, taking on board lessons from Gatwick and the previous Heathrow DCO. There is a meeting next week with the HSPG Chief Execs.

The WLA is also working on an expansion opportunity list. Not all London boroughs are members of the HSPG and this will be an opportunity to them to feed into the process. This will not become a joint west London position and it is expected to align with the HSPG statement.

#### **4 e) Cemetery Planning**

GLA are commissioning work on this with a report expected in August 2025. Some momentum on this has been lost but will use the GLA report in Autumn as a restart.

### **5. Borough and Other Authority Updates**

#### **5 a) Boroughs - Local plans/supplementary documents/CIL/article 4 directions/neighbourhood plans**

- Barnet – n/a
- Brent – Submitted LDS slightly later, going through the new system. Paper going to Cabinet seeking money to pay for the local Plan. Consultation starting next week on Kilburn Neighbourhood Plan.
- H&F – n/a
- Harrow – Working through MYQS, first week of examination is June 22<sup>nd</sup>. Thanks to SB for his summary of the London Plan Document
- Hillingdon – n/a
- Hounslow – n/a
- Ealing – Hearing on CIL starts June 4<sup>th</sup>, looking to adopt by the end of the year. An enormous number of questions on the Local Plan, over 1600! Done the first batch of written statements, working on the second now.

## **5 b) Old Oak/Park Royal MDC Update**

OPDC – Going to consultation on CIL and Planning Obligations SPD at the end of the month. LDS submitted but don't want to get ahead of the London Plan.

## **5 c) Transport for London Update**

A new connection tool has been developed, will be an alternative to PTAL. Will be launching next month, hopefully

## **5 d) West London Waste Authority**

n/a

## **5 e) Other updates:**

n/a

## **AOB**

The WLA Digital Team would like feedback on a proforma document from the mobile phone industry. Would you please share with DM colleagues and ask for responses.

## **6. Dates of next meeting:**

- 25th September 2025: Hybrid - In person preferred.
- 11th December 2025:

## APPENDIX

### Towards a New London Plan – Key points from Steve Barton

#### Spatial Development: Good Growth Objectives:

- The **Good Growth** objectives remain sound principles and will underpin the next London Plan but comments are sought.
- Acknowledges that there may be opportunities for joint work with the **Wider SE** to plan for growth across London's boundary, but doesn't suggest any?
- Proposes streamlining and updating the status of the **Opportunity Areas** with Southall described as "maturing" and OPDC "ready to go". But in a reference to the key diagram it is suggested Southall OAPF area met only 30-50% of its 10 year indicative capacity for homes delivered. Is that true?

#### Housing Delivery:

- Confirms **housing need in London is 87,992 new homes per year, a 69% increase** on the current target.
- It will plan for 880,000 homes, **ten years' supply**.
- It will treat London **as one large housing market**.
- It will set **targets** for each LPA.
- Acknowledges **barriers to housing delivery**: *"Achieving this level of housebuilding is clearly not just about the London Plan, or even planning more widely. It involves a range of other significant factors. For example, economic conditions, the availability of workers and materials, whether people can afford the homes once they are built, funding for affordable housing, and the delivery of the right supporting infrastructure."*
- **Brownfield sites first** stays - prioritising delivery within London's existing urban extent and ensuring that delivery is accelerated, wherever possible. But it acknowledges that: *"this alone will not be enough."*
- Notes over 750 sites were submitted in the call for sites.
- **Small sites** remain part of the mix and notes there is also a range of under-used sites such as low-density retail parks and car parks which offer potential for housing / mixed uses.

#### Affordable Housing:

- A review of **affordable housing threshold requirements**: *"to make sure that they still provide the right incentives to support affordable housing needs and delivery. This includes identifying whether some types of development are very challenging to deliver. It will also identify where sites might not be optimised due to the requirement to include affordable housing at 10 units. This can have a disproportionate cost in terms of value and delay to the planning application process. It is also noted that where different thresholds are set at a local level, this undermines the benefit and incentive of the threshold approach. In practice, this tends to result in delivering less affordable housing. The London Plan could be clearer about the need to consistently apply this incentive across all boroughs to avoid this."* The latter is clearly a reference to places like Ealing seeking to set different thresholds!
- Acknowledges that the greatest affordable housing need is for **social rent homes**: *"A future approach could put more emphasis on this housing tenure in line with national policy. This includes setting specific targets for social rent and increasing the proportion of social rented homes secured through the planning system."*
- Potentially introduce a **Key Worker Living** Rent (based on key workers' incomes) as a new tenure: *"This would provide more housing options for middle income households and London's essential workers."*

#### Housing Policies:



- **Estate regeneration** – the plan “*could require full replacement of social rent homes. This would ensure it is based on floorspace, not just where there is a right to return.*”
- **Build to Rent** – “*The current London Plan specifies Build to Rent schemes as being at least 50 units. However, this limit does not necessarily need to apply. If Build to Rent is to become more important in meeting housing needs, this definition could be expanded to support more diverse types of development.*” It goes on to suggest exploration of additional models to provide genuinely affordable housing as part of Build to Rent developments.
- **Other housing options** – “*Sometimes, market conditions and other factors can mean that some types of housing (such as co-living) dominate new supply, at least in some areas. Sometimes, housing is aimed at a very particular part of the population (for example, students). When general housing needs are acute, this can raise questions about whether the balance is right or if planning needs to adjust it.*”
- **Specialist and supported housing and housing London’s older population** – suggested possible introduction of “*a more strategic approach to meeting these housing needs to ensure the right housing mix overall across London is delivered. This may be particularly relevant when competition for suitable sites and funding is intense and there may not be a level playing field with general needs housing.*”
- **Shared housing, purpose built student, co-living, HMOs:** “*London Plan could set this balance and expected quality at a London-wide level (for example, through borough targets or a requirement for site allocations), helping to address the combined impact from many smaller decisions. Or it could be left for Local Plans alone, given this is not an issue felt everywhere. There could also be some aspects left to licensing policy as a more effective way to ensure quality.*”
- **GRT** - The current plan includes need figures for permanent pitches but does not include targets for permanent pitches and plots as this is left to the boroughs: “*The plan could set these targets so that there is better provision to meet needs, including where there is competition from other land uses, including other types of housing. The plan could include a London-wide target for transit pitches and provision for negotiated stopping arrangements.*”
- Proposes to include a strategic policy approach about the **loss of family-sized housing**.

### **Green Belt and MOL:**

- GLA will “*actively explore*” **releasing green belt** to meet unmet development need with scope for: “*maximising the level of affordable housing; ensuring high-quality housing design and good transport connectivity; and increasing biodiversity and access to good-quality green spaces as part any developments.*”
- The strategic green belt review will include identifying ‘**grey belt**’ land across London and acknowledges that is a complete reversal of policy: “*The truth is that some land designated ‘green belt’ in London is low quality, poorly maintained and rarely enjoyed by Londoners.*” Ealing was right all along and we should have stayed bold!
- Opportunities for large-scale development or **new towns** (10,000+ homes in each location) in London’s green belt are being considered in areas with good public transport access (or where this could feasibly be delivered). There is also significant potential with the government’s New Towns Taskforce, which we will be engaging with. RAF Northolt is not mentioned by name nor any other potential new town site. “*Large-scale urban extensions could enable us to deliver a programme to enhance, expand or establish regionally protected parks (Metropolitan Open Land) and other open spaces accessible for Londoners.*”
- The plan will be redrafted to **distinguish between MOL and green belt**, and protect MOL from green belt reviews. MOL performs “*a vital role for Londoners, and will become even more important as more homes are built. the Mayor will continue to give protection to MOL given its vital role for Londoners and providing a liveable city as London grows.*”
- However: “*some areas of MOL, such as certain **golf courses** are not accessible to the wider public and have limited biodiversity value. This undermines the purpose of the designation. These areas could be assessed to understand whether they should be released from MOL.*” Outlines scope for golf courses with Sites of Importance for Nature Conservation (SINC) designations be released (with compensatory biodiversity uplift).



## Design:

- Proposes setting out the **building heights** that should be acceptable in principle in all locations across London that share certain characteristics and set a minimum height benchmark across London to support small site development.
- Proposes a London-wide **small site design code**.
- Proposes taking a more active role in identifying and defining **tall building clusters**: *"This could allow more strategic consideration of tall buildings, their role and potential capacity and cross-borough issues. If this approach was taken, there would need to be a decision about what height is meant by a tall building cluster. The current plan includes a benchmark of seven storeys/21 metres. Alternative thresholds could be based on the heights at which planning applications are referred to the Mayor (10 storeys/30 metres dropping to eight storeys/25 metres by the River Thames) or a higher threshold of 20 storeys/60 metres."*
- Proposes to remove bespoke policies that cover **overheating and ventilation** and rely on new national building regulations
- Proposes that London Plan continues to opt in to Nationally Described Space Standard (NDSS) which sets minimum sizes for the **internal space** within new homes and continues to include the additional requirements in the plan.

## Climate Change etc:

- Proposes to review the role of **carbon offsets**, and the targets and metrics used,
- Proposes optimising the amount of waste heat made available for use in **low-carbon heat networks** from things like data centres.
- Proposes **Whole Life Cycle and Carbon Emission benchmarks** and to help incentivise meeting them, for example by reducing the information that needs to be submitted with an application. This could be like the current threshold approach for affordable housing.
- Confirms that the new London Plan will update borough-level **waste apportionment** targets. Mystery solved!
- Proposes to require the use of permeable surfaces when certain sites are redeveloped or when impermeable surfaces are proposed to reduce flood risk. For example, planning applications for front gardens associated with new kerb crossings.
- Acknowledge challenges in implementing the current policy for **Air Quality** Positive for larger proposals as it is not always clear when the requirement has been met. Proposes to introduce ambitious but achievable benchmarks, so it is clearer when requirements have been met. The approach could also incentivise meeting benchmarks, for example by reducing the information that needs to be submitted with an application. This is similar to the current threshold approach for affordable housing. It also proposes to consider a wider range of air pollution sources. For example, construction activities.

## Industry and the Economy:

- Acknowledges that 18 per cent of London's **industrial use** has been lost since 2001, and this rate is not sustainable: *"London needs sufficient industrial capacity"* and proposes the provisions: *"to provide additional, or swap, industrial capacity in London's grey belt - especially in locations that are less suitable for housing. For example, areas with high noise levels or better connections to the road network rather than public transport. This could allow some well-connected brownfield sites to be released for housing."*
- Invites views about **co-location**; *"We have heard that it can be challenging to deliver and note that it is usually restricted to light industrial uses alongside non-industrial space."*
- Currently **affordable workspace** requirements only apply to office and industrial uses. Proposes to include a different range of uses, including commercial, business and service uses (Class E) and a wider range of cultural and community uses. But acknowledges this could risk diluting the provision of affordable workspace. Proposes to support other approaches to delivery such as off-site provision and financial contributions and require a more consistent approach to affordable workspace delivery across London as a whole. It could, for example: *"set the scale of development that needs affordable workspace; how long the workspace should be affordable for; and a uniform rate of*

*discount on rent compared to the level of rent on the open market for that space and location. It could consider arrangements for time limited start-up space with pathways to open market space."*

### Town Centres:

- Proposes to review town centre designations and welcomes views about changes to existing town centre classifications or improvements in access to existing high streets and about where new town centres or local parades should be supported or required in areas that are currently deficient or where significant growth is planned.
- Acknowledges the potential of town centres and high streets to increase their contribution to housing: *"The Plan could take a very flexible approach to the range of businesses in town centres and high streets. This would explicitly enable any commercial and other appropriate development (such as places of worship, health and educational uses, nursing homes) in any strategic town centre (International to District town centres). It would be a significant change from the current plan."* It also suggests: *"The plan could also require the ground floor of buildings in key locations to be designed in a way that allowed more flexibility between uses such as shops, healthcare facilities or light industrial uses. It could also require active frontages in some town centre locations or designate some town centre areas as suitable for late night uses."*
- Proposes to remove its policy on hot food takeaways and rely on the new national policy.

### Transport and Infrastructure:

- Acknowledges the importance of **transport infrastructure**: *"achieving higher rates of housebuilding also depends on funding for vital transport improvements to unlock additional capacity for these homes. Higher volumes of development, as well as its sustainability, critically depend on good public transport connections and a high-quality safe environment for walking and cycling."*
- Acknowledges the need to extend and **upgrade the public transport network** and key initial priorities include the DLR extension, metroisation of suburban rail, the Bakerloo line extension and, most crucially for us, the **West London Orbital Railway** and that: *"new public transport that could unlock further housing capacity. This includes, for example new stations, increasing rail frequencies, and possibly extending existing lines. It is important to note that there are no proposals yet and any schemes have not been tested."* Metroisation could also benefit the borough: *"many National Rail lines serving suburban areas could have higher 'Metro'-like frequencies with relatively modest infrastructure improvements" and "could enable more mid-rise and small site development across a much wider area."* I couldn't find a reference to tiering LPA housing targets to the delivery of key transport projects though.
- Proposes faster, more direct **bus services** and more bus priority would also help support denser, sustainable development with local plans having to set out: *"clearly mapped transport interventions to enable and underpin sustainable growth."*
- Proposes a **new connectivity metric** to complement PTAL that is *"based on journey times by sustainable modes to useful destinations"* to inform the approach to densities, building heights and scale".
- Proposes to include policies on **advanced air mobility** i.e. drones and flying taxis that can be used to deliver goods and services by air.

### Viability:

- Acknowledges that the plan will take: *"an ambitious approach to quality, and we continue to deliver key objectives, like meeting our climate commitments and increasing inclusion, health, and wellbeing. In doing so, we must carefully consider the impact of policies, individually and cumulatively, on the costs and viability of development."*
- But that the next London Plan: *"will not increase the overall burden of planning policy requirements on development under the current circumstances. Opportunities will also be taken to streamline requirements and speed up consideration of planning applications. Some policy requirements may be phased so they start to apply at a later date or, for example, when economic conditions or technologies improve."* Does this suggest dilution or watering down of DM policies?

**Other Matters:**

- The time span for the new London Plan is **2027 to 2050**.
- The draft London Plan will be published in 2026 for examination, with formal adoption “expected” in 2028 which suggests the **timetable** has receded. That may be simply an acknowledgement of reality as the timetable previously suggested seemed ambitious and unrealistic. However, failure to publish before March 2026 could have implications for LPAs and the housing targets set out in the new standard method as the transitional arrangements would have expired.