

Will McKee CBE  
Chairman,  
Mayoral Outer London Commission  
City Hall  
The Queen's Walk  
London  
SE1 2AA

8<sup>th</sup> November 2011

Dear Mr McKee

At the end of your South London meeting on 27<sup>th</sup> September 2011 you invited the South London Partnership to send a written submission giving further details on the matters discussed. We are grateful for your Minutes of the Meeting which provided a basis for these.

I attach this written submission for the Commission's attention and ask that its requests be reflected in your advice to the Mayor on the forthcoming Supplementary Planning Guidance to the London Plan. I draw your attention *inter alia* to what it states on employment projections, the use of which remains a serious concern for us.

The Commission has been provided with the Partnerships South London Prospectus and I ask that full attention is paid to the strong potential for economic growth and employment in the sub-region which it sets out. I also commend to you the study on new approaches to office development carried out for SLP, which had been supplied to your officers.

The message which comes through time and again in the attached submission is the need for more flexibility in the application of London Plan policy, be it to do with our diverse town centres, parking policy and standards, our range of 'strategic outer London development centres' and the way in which housing density is interpreted. The Localism Bill is shortly to be enacted (as amended) and the National Planning Policy Framework finalised. These will place greater emphasis on Local Authorities being able to determine what is most appropriate for their local areas.

On housing density, we see a real danger that the London Plan's density matrix will fail to reflect the diverse character of much of outer London which makes it attractive. We see retention of this character as vital to South London's employment growth, enhancing its attractiveness to business investment. In the context of the new national planning policy, the London Plan may need to be revisited if sufficient local flexibility cannot be provided within its current policy framework.

We hope your advice for the SPG will reflect this submission, augmenting our Prospectus and earlier presentation. We trust that the outcome will be an SPG which takes a positive forward-looking future for South London, as we have set out.

Yours sincerely



Cllr Sean Brennan  
Leader, Sutton Council  
Chair, South London Partnership Leaders' Group

cc: John Lett, Strategic Planning Manager, Greater London Authority, City Hall, The Queen's Walk, London SE1 2AA

Enc: SLP Further written Submissions to the Outer London Commission

# South London Partnership

## Further written Submissions to the Outer London Commission

At the end of the Commission's South London meeting on 27 September 2011 its Chair, Will McKee, invited SLP to put forward further written material in support of the key concerns it had prepared for the meeting and on matters which were discussed then: as the Chair put it, "provide as much detail as possible to enable requests and suggestions to be acted on". Helpful minutes of the meeting have been provided by the OLC secretariat, identifying matters raised. This Note seeks to respond, having been endorsed by the SLP's Planning & Regeneration Group on 2 November.

We bear in mind that the Commission's main current purpose is to advise the Mayor on the production of Supplementary Planning Guidance (SPG) to the new London Plan's Town Centre and Strategic Outer London Development Centre (SOLDC) policies, and in doing so to take account of transport priority and parking policy issues. The OLC will be completing its advice later this month, with the resulting SPG due to be issued during the winter. The Commission is also focusing on housing density, where its advice is pertinent to the forthcoming Housing SPG, but it is also relevant to this Town Centre/SOLDC SPG.

This Note follows the order in which matters were discussed at the meeting and further submissions invited.

### 1 Employment

The Commission sought to reassure the Partnership on its concerns regarding the GLA's employment projections as the bore on South London: they will not prevent it growing as much as it is able to, and they will not set a 'tone' which would curtail South London's relative priority for transport and other investment. This assurance was very welcome and indicated a shift from the GLA's position at the EiP which defended the projections against SLP's alternative (Oxford Economics).

SLP now asks the Commission explicitly to advise the Mayor (for inclusion in the SPG) that it backs South London's intent to secure strong and increasing growth, and recognises its potential to diversify across a range of sectors, notably in the 'knowledge economy'. This is based on the advantages given by the levels of skills and qualifications of the resident population, its relatively well-educated and culturally-rich young people and the degree of entrepreneurship evident. Such

growth will have the further advantage of reducing the need for South Londoners to commute into central

London, creating a more sustainable outer London and reducing pressure on radial rail services, both in line with Mayoral objectives.

The Commission should also note that SLP will undertake further work on emerging clusters of economic and business activity, reflecting the particular potentials of South London's polycentric urban structure.

## 2 Town centres

As regards South London's main centres, SLP asks the Commission to recognise two key points. Firstly, that each centre has its specific potentials and specialities: there should not be a 'one size fits all' approach; for example Sutton suffers from comparatively poor public transport accessibility and competes on availability and price of its public car parking, requiring a locally-tailored approach. Secondly a combination of tough economic conditions and trading changes including growth in internet shopping and store relocations to out-of-centre retail parks with free car parking, need addressing. We ask that the SPG reinforces Mayoral support for town centre retail over out-of-centre locations (and see below on parking). A further round of health-checks, in 2012, seems necessary to measure changing circumstances and identify the extent to which revised formats and policy responses could be required.

**Offices** The Commission's prescription on managing the transition from dated space to 'a more vibrant mix' of town centre uses needs, in our view, taking further. The extent to which value can be added by residential use needs clarifying in the changed housing market circumstances now apparent in outer London. SLP presses on the Commission a move to new forms of provision of office space arising from emerging sources of demand, particularly from SMEs in the 'knowledge economy'. We ask that close attention is paid to the findings of the Kingston University/Ramidus Consulting report, regarding a 'new model' of office space demand related to new forms of innovative, information technology based businesses. These arise from South London's advantages in skill levels, entrepreneurship and knowledge economy potential referred to above, and have the scope to create new sources of property value. It does link with the Commission's question on managed office space.

Wimbledon is emerging as a strategic office centre, based on its international brand. There is evidence of demand for modern, adaptable space with good values achievable for the right site offer. Current rental levels are the highest in South

London. Merton Council is working with partners (e.g. Network Rail) on site availability. SLP asks that the OLC recognises this.

### **3 Parking and other Transport matters**

SLP acknowledges TfL's findings on comparison of parking standards and provision with adjoining parts of the Outer Metropolitan Area. The discrepancy is clearly with office development, which we ask be given further attention. While TfL's indication that more generous provision can be made if policy criteria are met goes some way to address the point, the property market evidence is that the situation seriously disadvantages investment in South London. SLP therefore seeks a move to more locally-based standards reflecting particular circumstances, thereby enabling a more 'level playing field'. We ask the Commission to accept this.

On town centre parking generally, SLP asks that particular attention is paid to the situation at district centres, many of which are facing increasing vitality and viability problems. This justifies separate, more flexible policy based on local economic circumstances.

The Commission is also asked to address the situation at out-of-centre retail parks, where free parking is increasingly detrimental to the attractiveness of town centres. The 'town centre first' policy needs reinforcing by assessment of the impact on individual town centres of retail parks in the area, and formulation of appropriate measures accordingly. We ask that the SPG takes this seriously into account. Parking issues at industrial locations are considered in 6 below.

On Transport generally, SLP welcomes the wide measure of agreement at the meeting on the crucial importance of targeted accessibility improvements to South London's economic growth. We look forward to continuing the work through the South London Transport Board on priorities, extending the Tramlink network and addressing funding constraints through innovative mechanisms.

### **4 Strategic Outer London Development Centres**

As indicated at the meeting, SLP is keen to make the most of the opportunity set out in London Plan policy 2.16 and welcomes the Commission's wish to amplify the concept. We look to the SPG to sharpen its purpose, firstly by confirming the other sectoral potentials we have put forward, and secondly by scoping implementation mechanisms including access to resources on defined requirements such as improvements to local transport.

As regards the Wandle Valley SOLDC, SLP has already put forward additional economic sector potential. We amplify the situation in three respects.

**First**, it includes the London Plan's Colliers Wood/South Wimbledon Intensification Area, which has good public transport accessibility and redevelopment potential. Merton Council sees it as a centre of the SOLDC for business growth including green enterprises and creative industries. Work is continuing on a development framework, engaging major landowners and TfL. The Commission's support is sought in acknowledging and realising the potential here, within the wider SOLDC.

**Second**, realisation of the potential for leisure, tourism, culture and sport is dependent on creating the Wandle Valley Regional Park, pursuant to London Plan policy 2.18C, which should be seen as a facility for South London as a whole. It will require substantial investment in facilities, funding for which depends on repatriating the precept South London Boroughs pay to the Lee Valley Regional Park, which our residents do not benefit from. The Commission's support is sought for this and other funding sources.

**Third**, this SOLDC includes four London Plan Strategic Industrial Locations (policy 2.17 and Annex 3), containing a range of business sectors and potential for further investment and growth, which would contribute to the employment potential referred to above. See under 6 below for improvement intentions at South London's industrial locations.

Regarding the Biggin Hill SOLDC, SLP supports Bromley Council's written submission regarding amplification of the 'other transport related' sector to reflect the broader range of advanced technology businesses there, with potential for growing a commercial cluster attracting continuing investment and sustainable growth. Success will require improvements to infrastructure, a range of premises and facilities and further development of the surrounding area's skills base.

On the basis that the Croydon, Kingston and Richmond SOLDCs are town-centre focused, the SPG should clarify the relationship between London Plan policies 2.15 and 2.16 in this respect.

Generally, taking account of their diversity, SPG asks that the SPG establishes that the Local Authorities have a full role in the determining the mechanisms for taking forward the SOLDCs, working with local stakeholders and the GLA.

## **5 Housing Density**

SLP asks for recognition in the SPG of the housing market circumstances in outer London generally and South London in particular, which are quite different from those in central and parts of inner London and have more in common with the adjoining Outer Metropolitan Area.

SLP supports the concentration of higher density (mainly flatted) development at the main town centres (Croydon being pre-eminent, on the basis of its public transport accessibility), and at other centres benefiting from good access. Delivery of such development will be important if South London's assessed housing capacity is to be realised. As well as accessibility, other factors to be highlighted are high quality design and management arrangements.

Elsewhere, while we welcome the Mayor's policy intent to take account of local settings and circumstances in determining appropriate density, a proper consensual and locally-participative approach, giving due weight to 'context', requires a change in the way policy and the density matrix is applied; we see this as in tune with the new 'localism' agenda. Sutton Council has pioneered a 'characterisation study' approach, providing a fine-grained justification for differential densities; it is now being undertaken in Merton. This approach will facilitate delivery for needed family housing and suitable provision for older small households, as well as focusing on the quality of suburban lifestyles, seen as important in attracting economic growth.

SLP asks the Commission to recommend that these points are included in the Housing SPG, so that Boroughs will have the required flexibility related to their local circumstances.

## **6 Industrial Locations**

SLP asks the Commission to consider the situation at South London's strategic industrial locations, and other industrial estates identified as locally significant. Following Ian Andrews' (SOLOMAN) intervention at the meeting as minuted, he has provided details for inclusion in this submission. There is evidence that problems on industrial estates, which reduce competitiveness and curtail growth, can be addressed effectively by collective action and a group approach. Ian Andrews reports on a pilot in South London over two stages: a 'pump-priming' first, leading to a second where a funding Business Improvement District (BID) is launched and sustained. He concludes that the track record of this initiative indicates the effectiveness of this approach, and that SLP could propose to the Commission a pump-priming fund to initiate stage 1 and a loan fund to support stage 2.

This SLP does, to enable this promising approach to extent to other locations and secure improvements to the business environment.

Parking is a problem at industrial locations in two related respects. Firstly, tight standards are a serious disincentive to business investment; realisation of South London's growth potential requires local flexibility in determining appropriate parking provision for new developments, taking account of often low public transport accessibility. Second, much parking on existing estates takes place on-street, causing congestion and reducing operating efficiency and appearance. Merton Council states this is cited by both businesses and property agents as a main deterrent to business retention and growth, especially at the industrial areas along the Wandle Valley.

SLP asks that the SPG addresses the matter, tailored to the different characteristics of industrial locations compared to town centres.

**Martin Simmons**

Planning Advisor to SLP

Revised 7 November 2011