G1 How important is it to maintain a balance between housing and employment in a growing post-industrial city? What do you think the right balance is?

The inter-dependency between housing and employment space in forging sustainable communities is recognised by the Royal Borough of Kingston, and was neatly summed up by the Council Leader of in his forward to the current version of the Council's Policy Programme *'Destination Kingston'- "Our policy programme is focused on bringing new housing and new business to our Borough.   One without the other is simply not sustainable."*

This Council is clear that it is essential to maintain a balance between housing and employment provision. This can often be challenging because residential values in this Borough far exceed most forms of employment use, with the exception of retail, and there is considerable pressure from developers to release employment land for housing use. However, the Council has strong planning policy controls to support, retain and expand the Borough's employment base. Planning decisions in the Borough have sought wherever appropriate to protect employment sites from redevelopment for housing use. A recent example being the decision to refuse permission to redevelop a site for housing that is currently in hotel use. However, the Council acknowledges the need for balanced approach between retaining employment space and the need for more housing, and has supported redevelopment for housing of employment sites where the premises are clearly no longer fit for employment use.

The Council is one of a number of authorities very concerned about the Government's relaxation of permitted development rights to allow change of use from office to residential. This uncontrolled change has resulted in 14,328sqm of space in this Borough lost to residential use, with a further 25,139sqm currently subject to unimplemented approvals. The loss is undermining the local economy, and the Council is in the process of introducing an Article 4 Direction to recover planning control for this change of use. The Government's stated policy intention when introducing this widening of permitted development rights was to make it easier for owners/developers to bring back into use vacant redundant office space that was no longer fit for purpose. However, what has transpired is a free for all, where in Kingston's case 53% of the granted prior approvals have been for premises that were occupied and in beneficial economic use. We estimate that approximately 200 jobs have so far been lost/displaced as a result of the Government's policy. However, from 1st October 2015 the Council will have recovered planning control.

The loss of employment floorspace through permitted development, some of it in the Borough's designated employment areas, is shifting the balance away from creating sustainable communities. There will be a critical mass of commercial space required in any location to retain the area's attraction for commercial uses, and its ability to provide job opportunities. Where centres and other locations lose that critical mass this can lead to the location taking on a 'dormitory' nature, where businesses and investors do not compete for space and do not see the potential from future growth. Dormitory towns are characterised by a relatively disengaged, evening and weekend resident population who have a low emotional attachment to the area and a daily opportunity to spend outside the Borough. Low attachment and out of borough job-seeking has the potential to be pan-generational which may accelerate the detrimental effect of the process.

This borough has a sizeable portion of the economically active population (circa 50%) travelling out of the borough to better paid jobs in the CAZ/City of London/Surrey towns, and the Council wishes to provide opportunities for these residents to work in-Borough. A current barrier to the provision of opportunities for better paid employment in the Borough is the relatively low waged and low gross value added from the employment base that is a disincentive for inward investors. However, the presence of Kingston University and its leading edge research and innovation capabilities is a relatively untapped opportunity to reverse some of this high earner outflow. The opportunity to capture these research and innovation capabilities naturally assumes that there is a cost sensitive work/residential provision in the Borough. This provision will need to accommodate "early-days" financial pressures otherwise risk a 'brain-drain' to other locations in and out of London as has been the experience to date of the businesses set-up by Kingston University students who choose to set up outside the Borough in areas where there is more affordable and flexible workspace and affordable housing.

Conversely a significant proportion of the workforce in the Borough travel into the Borough to work from locations elsewhere. This is the case for a high proportion of the relatively low waged shop worker jobs, and other low wage businesses that draw their workforce from areas beyond the Borough where housing is more affordable. Increasing the amount of affordable housing in the Borough is an important part of maintaining the right balance between housing and employment provision.

The significant population increase forecast over the next 20+ years suggests there will be both increasing pressure on relatively low value employment land, but yet an increasing need for space for jobs. Land identified and allocated for employment use in this Borough is

limited in extent and existing premises have high occupancy rates. Whilst there may be a case for some employment sites that are not located in designated employment areas being redeveloped for housing, it is considered critical not to lose employment sites within designated employment areas. There is a lot more scope and flexibility to find land for housing than there is to find sites for employment uses.

G2 If London continues to expand the housing pipeline/ allocations, will that distort the balance between housing and employment? What significant effects might that have within different parts of outer London?

For Boroughs such as Kingston to be able to continue to provide sustainable communities with opportunities to live and work locally there must be sufficient employment land protected from loss to other uses. In terms of industrial uses, Kingston like the other outer south London boroughs is identified in the London Plan as a location where the transfer of industrial land to other uses is restricted, and this strikes the right balance. The restrictive change category reflects the relatively high demand for employment space in the south London sub-region, and is a mechanism designed to ensure land for employment purposes is retained where it is needed. In other London sub-regions there is not the same need to restrict the loss of employment land, and managed release of industrial land is allowed. However, the loss of office space to residential use in the Borough's town and district centres via the permitted development rights is a matter of great concern, that, if unchecked could distort the balance, and result in more residents needing to find employment (especially higher waged employment) out of the Borough.

This Council is introducing an Article 4 Direction to recover planning control of the office to residential permitted development to stop the unchecked loss of office employment space. Where significant amounts of office floorspace are lost at some point the tipping point will be reached where there is insufficient critical mass remaining to maintain a fully functioning office sector and to attract inward investment. Locations in this scenario, and we appreciate it is a matter of fact and degree, would become dormitories serving employment hubs in Central London and towns in the neighbouring south-east. A reduction in local employment options to borough residents could drive increased levels of commuting, and lower work/life balance for residents.

The significant rise forecast for London's population in the short, medium and longer term will lead to an increase in employment opportunities in this Borough and elsewhere. Kingston's population is forecast to rise by 55,000 between 2011 and 2050 and employment

by 17,400 over the same period[1]. If the Borough is to deliver what is a 22% increase in employment levels from the current 78,000 jobs base, it will need to provide opportunities to modernise existing employment space, but also to provide the opportunity for new employment space.

The continued provision of sufficient employment floorspace to generate a thriving commercial economy is critical to the fostering of sustainable communities, and policy should work to ensure any proposed reductions in employment land are carefully considered to ensure overall there remains sufficient premises/land for needed employment use over the Plan period.

G3 What type of workspace/ employment land will be required in the future relative to trends in the existing stock? Does this require a policy approach which extends beyond London?

The type of workspace required would have to cover a spectrum of needs including:

Cost - A range of workspaces which match the affordability parameters of the entire lifecycle of business from small start-up space, through grow-on space for 3-4 person enterprises and on to space for bigger enterprises (50+ people). This would enable the Council to support the entire spectrum of business growth within the Borough. In order to persuade fledgling businesses (perhaps emanating from Kingston University) to set-up and remain in the Borough, consideration has to be given to the affordability of both workspace and residential space. Both have to be available locally and at an affordable cost (at least initially) to make the new business equation work.

Quality – a range of buildings of different qualities from basic (but with givens like ultra-fast broadband) at the start-up/incubator/low-cost end, through to grade 'A' quality buildings for more established businesses. This would enable individual businesses to have choice of location based on need and affordability at their current stage of growth. At the present time there is very little Grade A office space in this Borough, and generally the stock is poor quality. There is an acknowledged need for existing stock to be refurbished, and for the provision of new Grade A office floorspace in the Borough, and particularly in locations close to key transport nodes.

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[1] GLA Intelligence - Population And Employment Projections to Support the London Infrastructure Plan 2050 Update November 2013

Type/Suitability – a range of different flexible spaces for working, selling and 'making' which are appropriate for the variety of sectors operating in the Borough. This might include a range of offerings like:

- Flexible incubator space for high tech, green and creative industries businesses
- single desk, shared workspace available on an ad hoc basis
- small cellular offices available on an ad hoc or for an agreed term
- shared meeting rooms – ad hoc or agreed term
- larger office spaces available for agreed lengths of time
- training, event and performance areas – available on an ad hoc basis
- small space for manufacturing/producing – possibly combined with front office space for selling. This might apply to small manufacturers, 3D printers, food makers, craft makers etc.

Variety of Locations – there would be a reduced impact of all of the above provisions if these are not in a variety of easily accessible locations across the Borough. It will be important to ensure that a strategy is in place to ensure the key district centres and possibly industrial estates are provided for. These could be clustered together in areas where there is a strategy to develop better transport links or around emerging cycle superhighways making for a number of small artisan quarters that in turn would attract new businesses due to affinity between businesses.

Kingston's location on the edge of London neighbouring a number of Surrey Councils with very different policy regimes in terms of critical issues such as car parking standards, needs to be carefully considered. Businesses and investors do not confine their areas of search to administrative boundaries, and business decision-making will be influenced by ability to park sufficient cars and other costs associated with infrastructure, and London generally loses out to Surrey authorities that have much more liberal parking regimes.

G4 In the context of meeting London's growth, what contribution should the following mechanisms make to helping to meet the challenge of delivering increased levels of housing?
- **Increasing outer London densities, particularly through suburban renewal**
- **More housing at higher densities in town centres and Opportunity Areas/ Intensification Areas with good public transport**
- **Greater cumulative contribution of small scale sites, such as infill**

- **Selective release of London's greenbelt around public transport nodes for housing (or consolidation of employment)**

- **Densification of built up areas beyond London (new towns; garden cities, suburban extensions)**

For each, where might there be particular opportunities, how could this be supported and what / where are the specific challenges and constraints (eg what impact might this have on character and context; land values; balance between housing and employment; access to particular types / lower cost employment space, infrastructure requirement, etc).

Increasing outer London densities, particularly through suburban renewal

The OLC's 'suburban renewal' growth option unsurprisingly identifies that outer London could make a much more significant contribution to accommodating growth than Inner London, which contains far less suburban area. The OLC definition of suburban areas excludes the town and district centres and is confined to the predominantly residential areas. Whilst densities could rise in some suburban areas, the generally low PTAL levels in these areas (PTAL 3 or below) and the prevailing two storey local character means the scope for significant increase is currently limited.

The Mayor and OLC report refers to PTAL 4 or above as being areas with good public transport provision. Approximately 75% of this Borough's land area is at PTAL level 3 or below, ie three quarters of the Borough is not considered to have good public transport connectivity. Therefore clearly the scope for widespread suburban renewal is clearly limited. There are however, opportunities for higher density development, in the town and district centres and on existing transport corridors where PTALs are at 4 or above and where higher density development could enhance the prevailing suburban character. Without substantial investment in transport infrastructure the vast majority of suburban outer London will remain remote and reliant on private vehicles and car borne journeys. Substantial new development in these suburban areas would constitute unsustainable development unless accompanied by significant improvements in transport infrastructure.

More housing at higher densities in town centres and Opportunity Areas/ Intensification Areas with good public transport

The OLC's 'town centre' growth option scenario indicates that outer London has more potential than Inner London to accommodate the needed growth. This reflects the large number of town and district centres in outer London compared to Inner London. Kingston Council considers that this option, for the reasons set out below, presents the best and most sustainable means of unlocking growth and delivering substantial increases in housing

numbers. However, if the Mayor is serious about maintaining and developing sustainable communities, higher density housing in town centres must not be at the expense of the provision of employment floorspace.

Most town centres benefit from relatively good levels of public transport accessibility, and have sites that could accommodate higher density redevelopment, albeit there are usually competing demands for a limited land supply, and constraints on the scale of growth possible due to matters such as the historic environment. For example, large areas of Kingston town centre are located within PTAL 6, and there are a number of opportunity sites that are or will be the subject of development briefs that are capable of supporting significant housing numbers. The recently adopted Eden Quarter brief identifies capacity for approximately 1,200 units, and there are permissions for 500+ units in part of the North Kingston site brief area. Further sites will come forward such as the Station Quarter that could accommodate significant jobs and new dwellings should a commitment to bring Crossrail 2 to Kingston be confirmed. The Council is working with the Mayor to formally identify a Kingston Opportunity Area that will include an area covering Kingston town centre eastwards to include the Local Authority's Cambridge Rd Estate. This area contains significant scope to meet Kingston's needs for housing growth.

The Council is also working with the Mayor to identify Tolworth as a regeneration area.

Whilst locations such as Kingston town centre are categorised as having the top scoring PTAL – 6, this largely reflects the excellent bus coverage in the town. However, rail connections are poor with just the one loop line provided. Comparing Kingston's transport accessibility with other areas with PTAL scores of 6, it is notable that other locations such as Croydon, Wimbledon and locations in Inner London have more diverse rail connectivity, and access to a rail network linking a lot more places than is the case for Kingston. This lack of connectivity for the most successful Metropolitan Centre in London needs to be addressed.

Greater cumulative contribution of small scale sites, such as infill

Small scale / infill sites already contribute significantly to housing provision in boroughs such as Kingston where there are comparatively few medium/large sites. Indeed last year sites of less than six units contributed 75% of the total permissions in the Borough. Whilst there are likely to be limitations to increasing density of infill sites around prevailing context and character there is a need to identify how the speed of delivery of small scale sites can be increased. There are barriers to delivery of small scale sites, chief among them access to

funding. These are identified and discussed in the final section (H questions) of this response.

It is of relevance to point out the considerable number of house extensions that continue to be developed through planning permission and through permitted development. Whilst extensions in themselves do not add units to the delivery of housing numbers, they do add to residential capacity, and may absorb some of the population growth as extensions allow family generations to live under one roof. We suggest that the impact of extensions on the need for housing is something that could usefully be researched by the GLA.

Selective release of London's greenbelt around public transport nodes for housing (or consolidation of employment)

London's Green Belt is a strategic matter that extends beyond London's boundaries, and would be best addressed through comprehensive consistent review at the regional level. There may be areas of Green Belt that no longer meet the statutory tests, and which could be released to provide much needed housing without leading to a negative impact on the overall quality of the Green Belt, and if these sites were to be located close to public transport nodes these would be the most appropriate location. However, in the absence of such a strategic review there cannot be selective release of Green Belt.

This Borough does not propose to release Green Belt land, and has taken a proactive approach to meeting the level of growth identified in the London Plan, which it plans to meet through intensive redevelopment in its town centres and in the Kingston Opportunity Area.

Densification of built up areas beyond London (new towns; garden cities, suburban extensions)

Accommodating some of London's growth beyond London's boundary has historically been part of the approach to addressing the need. However, this approach requires greater and greater levels of investment in transport infrastructure to transport the workers from their (dormitory) towns into the City. Journey taking place over increasing distances at a cost in terms of carbon and quality of life. A more sustainable approach would be to support the sustainable economic growth of suburban centres such as Kingston and Tolworth that have potential to expand their employment base serving a much more localised catchment area.

G6 Would it be worth considering growth 'corridors' (eg as with LSCC and linked to existing / potential public transport) in terms of enabling an integrated housing / employment / cross-boundary strategy…and if so, which

corridors could be a focus (eg associated with CR2, HS1, HS2, CR1 extensions, C2C improvement, Gatwick)?

Yes it would be worth considering. The impact of the step change in transport accessibility along the routes of projects such as Crossrail 2 will generate the opportunity for significant growth that should be fully exploited. We anticipate that there will be a number of Crossrail 2 stations in this Borough, and that this step change in public transport accessibility will generate significant levels of growth in each of these locations along the Crossrail 2 corridor. This is a significant opportunity that the Council is keen to work with TfL, Network Rail, the Mayor of London and other partners to exploit to the full.

G7 How can we maximise the benefits of growth regionally, sub-regionally and locally; and mitigate concerns? (eg provision of supporting social and community infrastructure; greater focus on place-making; re-provision in the new development of social housing)

A key benefit of new housing growth is that it will help sustain existing local services and facilities. This will be particularly beneficial in the district and local centres where changes in shopping habits have weakened the vitality of some centres and additional housing will boost footfall and reinforce these centres.

Benefits can also be maximised by ensuring that as far as possible the right growth takes place in the right locations, and meets the right tenure and mix requirements, thus addressing the key matter – the need to provide more housing. Ensuring growth is appropriately targeted will require consideration of local Strategic Housing Market Assessments. However, and as alluded to in the question, the benefits will also include additional infrastructure required to facilitate the new development, but which will also be of benefit to the existing population, and which will make the growth more acceptable.

Infrastructure requirements should be identified and innovative funding solutions applied to allow the delivery of schools, health facilities and other social infrastructure ahead of major new development to both facilitate and stimulate the growth, and address local concerns about inadequate infrastructure provision.

The quality of new development is critical for the mitigation of local concerns. Design quality has been a critical factor recently in this Borough in determining whether schemes progress or are sent back to the drawing board. High quality design can be a counter-balance to concerns about density.

G8 Does the London Plan density matrix need to be reviewed (eg PTAL splits, characterisation, the ranges themselves), or is it better to keep it as a benchmark and use it to bargain for higher quality / more social infrastructure / more affordable housing?

The matrix works as a benchmark. It is used by developers to argue that their site can successfully accommodate development at well above the maximum densities because it does not harm local character and context and allows the provision of affordable housing and planning contributions.

We support the need for a review of the PTAL ratings, which can appear to be inconsistent. The huge differences between what level of provision is achieved at PTAL 6 in inner compared to outer London is not distinguished on the matrix, but should be. Areas that rely on for example one tube/train line (in and out) and 10 buses which only travel locally should be considered as a different PTAL to areas that have three tube/train lines with differing destinations and four buses that travel strategically linking wider areas. PTAL ratings are currently a measure of 'good access to services' and do not factor in the range of routes served, which is more important for housing, employment and access to amenities.

G9 Have you any suggestions for new Opportunity/Intensification Areas; or medium sized town centres suitable for higher density, housing led renewal/redevelopment?

This Council has identified an area taking in Kingston town centre and land to the east (including a Local Authority housing estate) for identification as an Opportunity Area in the next iteration of the London Plan. The Council is working with the Mayor to assess and realise the potential of this area. The capacity of this area to accommodate growth has not yet been fully assessed, but it is likely to exceed the 2,000 jobs and 2,500 homes minimum Opportunity Area threshold. The Council are currently reviewing how best to provide the statutory planning framework to allow development to be planned and taken forward in this area prior to the adoption of the next London Plan towards the end of 2018.

The other key opportunity for growth in the Borough is at Tolworth District Centre where there are some significant development opportunity sites within and adjoining the District Centre that are identified in the Core Strategy. The possible introduction of a Crossrail 2 station and decking over part of the A3 could significantly increase the potential of the Centre for growth, and support higher density development as Crossrail will lift the PTAL in

the centre beyond its current 3 rating. The Council propose to prepare a masterplan for taking forward development in Tolworth.

Areas associated with stations on the Crossrail 2 route may offer opportunity for growth, and should be explored once there is more certainty on the route.

The Mayor should deliver on the principle that areas that come forward to take more growth should receive the infrastructure investment benefits that will improve quality of life for existing as well as future residents.

QUESTIONS ON THE FUNCTION OF NEW CO-ORDINATING ARRANGEMENTS

R1 Should London and the wider south east be viewed as one area for managing growth? What are the planning implications of this for housing and jobs growth and strategic infrastructure provision?

Due to the nature of influencing growth and the way it arises and expresses itself, viewing the wider south east as one area could potentially be beneficial, especially for outer London boroughs that share borders with boroughs/districts in the southeast, and therefore have clear interdependencies around demand, supply and infrastructure associated with employment, housing and leisure. For example Kingston shares borders with Elmbridge, Epsom & Ewell and Mole Valley and significant numbers of commutes to Kingston are made from those areas for employment, education, health and shopping and leisure reasons. The key strategic issue to address with these interactions is how to address the high levels of car borne trips, and how to affect modal shift to more sustainable means. Improvements to inter-regional public transport is therefore a key issue requiring consideration.

The South London Partnership's 2012 'South London Prospectus' identifies a number of priority growth areas including Kingston town centre and Tolworth that will be able to deliver significant growth should there be the necessary investment in transport and other infrastructure improving linkages with the Surrey districts as well as the south London boroughs. The Prospectus highlights a number of inter-regional transport improvements that would significant boost growth prospects, key amongst them are improvements to links to the main airports, and support for the regional Crossrail 2 that would extend out into Surrey. In the case of Heathrow, the Airtrack scheme would bring significant opportunities for residents and businesses in this Borough. Crossrail 2 will deliver a step change in public transport accessibility for the Borough's residents and businesses, with the prospect of

substantial growth in the corridor around the stations along the route. The Prospectus sets out the case for why more growth would be attracted to the sub-region if primed by the necessary investment in infrastructure.

R2 Which strategic policy issues affecting this part of London would benefit from being considered through some co-ordination of planning with authorities across the wider south east as a whole, or with representative of adjoining sub -regions?

The key strategic policy issue in the south-west London north-east Surrey area is the need for more and better transport infrastructure, particularly public transport networking and capacity. As referred to above Kingston provides a number of sub-regional facilities and services that are used by residents of the neighbouring Surrey boroughs/districts. Facilities such as Kingston University (the largest such facility in south London), Kingston College, Kingston Hospital and the Crown Courts all serve a wide sub-regional catchment. The range of leisure and shopping facilities in the town centre serve an even wider catchment and generate in excess of 20 million trips per annum. A high proportion of trips from Surrey into Kingston are made by private car, and this is the key strategic issue to address.

The South London Partnership's 2012 'South London Prospectus' identifies a number of priority transport infrastructure projects that would improve inter-regional connectivity and offer an alternative to the car. The regional Crossrail 2 will extend out into Surrey, improving accessibility to Central London, but also making locations in this Borough more accessible by public transport. Improved connection to the region's main airports will reduce congestion on roads in London and Surrey, and will increase the attraction of the Borough as a business location.

R3 Should new co-ordinating arrangements only consider pan-regional or also cross-boundary issues? At what level does an issue go from being cross boundary to pan-regional?

It would be useful for both cross-boundary and pan-regional issues to be considered through a structure that included the regional authorities/counties as well as the individual boroughs, as otherwise there is no formal coordinating structures to take any inter-regional issues forward. Cross-boundary issues would include localised transport initiatives such as park and ride facilities, which in Kingston's case could involve discussions with Mole Valley and Spelthorne. Pan-regional issues would, to continue on the transport theme, include inter-regional proposals such as Crossrail 2.

R4 How could useful co-operative relationships be built (over time) across the border, going beyond the statutory requirements under which the Mayor and LPAs work? How can any value be added to this process?

The boroughs do already liaise on strategic planning issues under the duty to co-operate, which is a statutory requirement, and in our experience the officer level liaison does build relationships. However, an inter-regional forum for Senior Officers / Members would be helpful to build understanding of the key inter-regional planning and other issues and to look towards solutions. We favour a sub-regional approach to inter-regional discussion, which in this area could be appropriately facilitated through the South London Partnership and the Surrey county and districts. The SLP is also an appropriate medium to develop inter-regional liaison and co-operation between this sub-region and the Surrey LEPs.

R5 How could new co-ordination arrangements usefully promote and enable the development of a common evidence base, and a shared understanding of how local and sub-regional economies, housing markets and labour markets interact and to what extent could it do this effectively?

Kingston is working cooperatively with its three neighbouring authorities on a strategic housing market assessment that identifies the four authorities as the Housing Market Area. This is the only such example amongst London boroughs, but reflects housing market conditions in this part of London/the South-east. In taking this approach Kingston is following the approach recommended by the National Planning Policy Framework and Guidance, and the work will provide a common understanding of housing needs by sector, size and tenure as well as overall housing need. Whilst the London Plan sets an overall minimum housing requirement, the London Plan Inspector did specifically identify that boroughs need to look beyond the minimum identified, and look at mix and tenure types and in particular affordable housing.

We consider that boroughs need to identify which neighbouring authorities they need to work with in their Housing Market Area and then seek, as Kingston has, to work with them to prepare a common evidence base. However, this is not easy to progress and needs a desire on the part of all authorities, including at Member level to proceed.

Labour markets servicing business clusters often develop along major arterial routes giving access to trading ports and customer conurbations. An understanding of how/why businesses have developed along routes which pass through and around the Borough and how similar businesses could be targeted for inward investment could be beneficial. Combining a similar multi-borough Labour Market Area assessment with a Housing Market

Area assessment could be performed, with a multi-borough co-operation being taken forward to strategically attract a range of businesses and provide complementary business and housing provision to support the multi-borough strategy.

R6 How could new co-ordination arrangements facilitate the identification of different views among its members? And how might these different views be accommodated?

Depending on the investment made, it should be possible for these arrangements to facilitate the development and maintenance of some form of data warehouse for each participating Council's statistics allowing easy cross-reference and analysis. Formal analysis would probably also be needed to achieve the "shared understanding".

In parallel with the duty to cooperate, there needs to be an understanding that cooperation and discussion will not always lead to agreement and the accommodation of all views/ perspectives.

QUESTIONS ON THE FORM OF NEW CO-ORDINATING ARRANGEMENTS

R7 Which geographical area should new co-ordination arrangements cover? Should it vary depending on the issue?

Co-ordination arrangements should be tailored to the specific issue to ensure there is a focused discussion and debate. Our experience with the housing needs assessment is that the key stimulus for inter-regional working was the need to be consistent with the NPPF. This clear strategic direction has influenced a willingness by this authority and its partners to work cooperatively.

R8 Who could constitute the membership? How many local authority representatives, how many LEP representatives and others should be directly involved?

We think the constitution of any grouping will depend on the issue and geography. We do not believe that there is any benefit in setting up a formal overarching Greater South-east Committee. Better to operate at the local issue/topic based level. However, we do support the GLA's recent approach which has been to hold periodic Inter-regional Summits/Forums to consider the key strategic issues. Again sub-regional partnerships such as the South London Partnership would be appropriate vehicles to build inter-regional understanding of

strategic issues and potential solutions. There is a need for more inter-regional liaison at the strategic level between outer London boroughs and Surrey county/districts.

R9 What should be the format of new co-ordination arrangements, and how many layers should it have? For example, should it include a regional plenary for all members and/or sub-committees for specific issues/ areas? Plus a political leadership group and officer servicing group?

It should definitely include some form of focus/working group for specific issues. Other forms of governance could be useful, but clarity would be needed about the purpose of such arrangements – for example, a body that includes representatives from each participating authority is unlikely to be an effective decision making body, but could provide an excellent resource for fostering innovation.

R10 How should new co-ordination arrangements be managed and by whom, and how should the required resources be shared? and how should it engage with its constituents/ the public?

A small secretariat function – co-located within an authority geographically central within the region – may prove necessary. Engagement with the public should be through the existing channels of the constituent bodies.

R11 How should new co-ordination arrangements relate to and work with structures and bodies within London?

The new arrangement would need to work with the existing sub-regions within London, and establish a functional relationship with the statutory bodies such as Historic England and also with key partners such as TfL.

R12 Should an evolutionary or incremental approach be taken to the development of new co-ordination arrangement, capable of adapting to changing circumstances – or should it be firmly fixed from the outset?

Evolutionary. There are challenges and solutions that will need to be identified and faced that are as yet unknowns, and therefore flexibility in terms of governance arrangements are necessary.

Removing Barriers to Housing Delivery

H1 What are the particular barriers holding back delivery of new housing in this sub region?

The following are the key barriers holding back south London from realising its growth potential:

- Poor transport infrastructure - especially poor orbital public transport links connecting up centres in the sub-region, poor accessibility to Heathrow/Gatwick and capacity constraints on radial public transport connections
- Difficulties experienced by small developers/builders accessing funding
- Developable land being mainly brownfield, complex to develop and in short supply with stiff competition leading to comparatively high land values
- Generally inadequate infrastructure provision failing to provide for growth needs
- A barrier holding back the delivery of affordable housing is the viability appraisal system, which is not an open and transparent tool.

The issues referred to above are inter-related and cannot be addressed effectively in isolation, as for example the high land values in this area make the delivery of new infrastructure more expensive and less likely to come forward, and add to the problems for small developers/builders accessing funds.

The barriers affect different market sectors in differing ways. There are important differences between small, mid and large scale development/developers. The differences and potential of each sector is discussed in response to the questions set out below.

H2 What is constraining the private sector from translating London's pipeline of approved homes into completions, for example:
    ● **developer sales practices and private sector concerns about market absorption;**
    ● **the scale of land banking and the number of approved sites owned by firms that do not actually build houses;**
    ● **the range and size of house building firms in London and the level of competition within the development sector; and**
    ● **private sector capacity and skills shortages.**

The problems and issues are mostly confined to the small and large scale development sectors, where the issues referred to above are relevant. The mid-sized schemes (schemes between 21-100 units) are the domain of the Registered Providers and mid-sized developers where there is relatively low risk and costs, and lots of expertise amongst the agents of

delivery. The mid-sized sector works efficiently compared to the small and large scheme sectors.

South London experiences large numbers of applications for small size developments (1-5 units) that do yield significant cumulative volume because of the relatively quick turnover, and relatively few large/very large sites (100+ and 500+) that also provide a significant pipeline, but delivery is over a longer timeframe. A significant amount of activity/ resource is required to service the small schemes even though most of these schemes are relatively uncomplicated, but there is a regular churn of low cost, quick turnover, low risk delivery.

The situation is different for the large / very large schemes, which deliver significant numbers, but take considerable time to develop, process and deliver, and are likely to be costly and risky for both local authorities and developers.

The key constraints for small build/self-build sector are – difficulties in securing bank lending, rises in construction costs have a disproportionate impact on viability, competition for land, and land banking by bigger developers.

The key constraints for the major developer sector are - viability concerns that mean marginal schemes are unlikely to proceed, and the timely provision of essential infrastructure to resolve constraints to meet new or emerging demand. In this Borough Crossrail 2 and improvements to the A3 truck road are two such infrastructure items that could unlock areas for significant development that are currently subject to transport constraints. The key viability issues are planning obligation costs / CIL and site abnormals (remediation etc). The major developers seek to avoid new build over-supply.

H3 What potential is there in Outer London for:
- **purpose built long-term, private rented sector housing (PRS)?**
- **specialist housing for students and older Londoners?**
- **housing intensification through estate regeneration schemes?**
- **the delivery of higher density development in town centres, taking into account land ownership constraints and the surrounding suburban context?**

Kingston has experienced high levels of buy-to-let in recent years, which suggests that there is likely to be scope and developer demand to expand the PRS in this Borough. The Council is aware of Registered Provider interest in the PRS product in this Borough, which could be used to cross subsidise affordable housing developments, improving RP's land bidding

capability, but like other products it is dependent on land availability and finance. Policy support for private rented housing is provided through the London Plan, which sees the product as a means of increasing housing delivery, and will be considered by this Borough when preparing the next Local Plan.

Kingston has a planning policy aspiration through the London Plan and its own Core Strategy to meet the needs for additional student accommodation, and a London Plan commitment to meet the needs for older people. Kingston's Core Strategy identifies a need for 2,500 additional beds in student halls of residence, and whilst a proportion of these have been delivered there is still a need to deliver approximately 850 more. Some of the provision may be delivered in adjacent boroughs. For instance in neighbouring Wandsworth the Roehampton Estate Development Brief identifies halls of residence as an acceptable use for part of the estate. Kingston Council will seek to identify suitable sites for student halls of residence through preparation of a new Local Plan.

Estate regeneration does offer considerable scope for raising housing delivery. In Kingston we are currently reviewing the potential to increase provision on the Cambridge Rd Estate, where it has been estimated numbers could double from the current 800 units, albeit these numbers are yet to be tested.

There is certainly great scope, and in Kingston's case ambition to deliver the step change in housing numbers through comprehensive town and district centre redevelopment. The OLC's question alludes to some of the constraints to growth in town centres, of which there are many, but town and district centres such as Kingston and Tolworth do contain some large sites that are capable of accommodating high density development. The Council is currently working with the GLA to prepare a planning document for the Kingston Opportunity Area and to prepare the Tolworth Area Plan that will identify the suitable sites, and establish the scale of growth possible and the infrastructure required to unlock growth in these areas. As previously mentioned the scope for higher density development in locations such as Kingston and Tolworth would be enhanced if PTAL levels were to increase from their current levels – a high of PTAL 3 in the case of Tolworth.

H4 What are the practical measures boroughs can take to boost supply, for example:
- **providing a more certain and speedy development management process for large developments prior to and following outline planning consent (eg s106 negotiations, use of conditions and condition discharge);**

- **greater use of CPO powers;**
- **wider application of the Housing Zones model to address particular local delivery challenges, working closely with the private sector and other stakeholders;**
- **widening the pool of identified and allocated large sites in Local Plans;**
- **providing a more positive and certain policy and development management framework for small scale/infill development in order to support small and medium sized house builders;**
- **requiring large sites to be parcelled up and split between a number of different developers in order to address slow build out rates and potential land banking;**
- **conditioning minimum levels of housing output on large sites over a fixed short to medium term horizon.**
- **exploring the potential scope for 'use it or lose it' powers.**

Below we identify some practical measures that would boost supply. This analysis is confined to the small and large sites because the mid-range schemes tend to require less support and intervention to deliver.

Small Scale Sites
- *Improve Information / coordination*
  - develop public sector small-sites database
  - introduce pre-consent mechanisms (eg Local Development Orders)
  - establish forums to highlight opportunities
- *Enhance certainty*
  - maximise available guidance
  - introduce pre-submission checking service
  - develop a service model for small developers
- *Improve efficiency*
  - initiatives to reduce repetition/ waste
  - bundle services: planning/building control
  - facilitate meet the buyer/ collective buying
- *Facilitate reduced cost*
  - develop an accredited technical professional scheme to support small builders/ self builders
  - develop 'approval in principle' mechanism
  - support / direct training and up-skilling
- *Increase Affordable Housing provision*
  - bundle small sites/ explore funding support
  - package Local Authority sites to target Registered Providers requirements
  - establish public sector land-banks for Registered Providers

Large Scale Sites
- *Improve Information / coordination*
  - diversify major developer market (public sector)
  - develop brownfield database (include public land)
  - partner with developers to deliver

- *Enhance certainty*
  - consider mechanisms eg Local Development Orders, Development Briefs

- Planning Performance Agreement's to include penalty clauses for all signatories
- developments should be separately parcelled
- *Improve efficiency*
  - create centres of excellence for skill sharing
  - introduce S.106 mediators, review conditions
  - develop joint project delivery teams
- *Facilitate reduced cost*
  - Review viability evidence
  - share resource / risk for land assembly'
  - invest to save' Local Authority costs underwritten
- *Increase Affordable Housing provision*
  - use Housing Zone model to set minimum Affordable Housing
  - replace viability test with Affordable Housing guarantee
  - Affordable Housing categorised as essential infrastructure with jointly prepared funding bids presented to CLG/ Treasury

H5 What potential role could local authorities play in building houses, especially on surplus public sector owned land? What are the financial and regulatory obstacles that need to be overcome to enable local authorities to contribute more directly to house building in London?

Local Authorities could identify Housing Revenue Account, non-Housing Revenue Account and private land suitable for residential development, and create a land bank of all potential land assets suitable for residential development. Encourage partner Registered Provider's and developers to bid for and submit development proposals. This would be similar in principal to the database currently being set up by the London Land Commission. The LLC will identify land in all forms of public ownership, be that NHS, MoD or local authority. Recent experience in this Borough suggests there may well be significant amounts of publicly owned land no longer needed for health or defence purposes that could be utilised to provide housing.

The Council has also set up a new estate regeneration programme to increase the number of homes within the Council's ownership that will seek ways to work in partnership with the private sector to lever in funds and expertise to support housing delivery to meet the projected population growth.

Local Authorities could foster robust partnering with developers and Registered Providers to take forward other sites, but also to tap into the wider pool of skills and resource available to the private sector.

Local Authorities should seek to deliver housing schemes in-house alone or through partnership delivery mechanisms such as JVs. However, in-house delivery will have

considerable resourcing and capability implications to produce a high quality product. The development of residential units for target/social rent are unlikely to come from developers and Registered Providers. Local Authorities should create programmes for self building residential schemes, the impact of such activity would generate rental income into the Housing Revenue Account.

Mechanisms to fast track schemes through planning that meet the affordable housing policy requirement in full should be developed, whilst ensuring that design quality and other key issues such as a scheme's sustainability credentials are adequately addressed.

Provide funding facilities to support self build developments. Create a system that enables Local Authorities to source funding for self build schemes.

H6 Is there an issue about skills and capacity within local authorities in delivering planning consents for large scale developments?

Yes - there is a skills/capacity shortage, and particularly in the critical area of viability assessment. A solution could be to combine services between two or more Authorities. This is becoming a familiar approach for local government where skills are shared across a number of Authorities. However, for specialist areas such as viability assessments, an approach could be setting up a regional skills hub. Some areas, such as Wales have set up such a hub albeit not for viability assessment work.

To assist consideration of the potential approaches it would be helpful to have a greater understanding of each authority's specialist skills, and whether there is a willingness to offer these skills on an advisory and/or commissioning basis, eg Surrey County Council offer their EIA abilities to Surrey Authorities. It is also important to identify and share good practice / knowledge, and this is something a regional skills hub could coordinate providing training programs etc.

H7 What role could modern methods of construction play in boosting private sector build out rates?

Modern methods of construction reduce the risks to construction programming, and therefore provide cost and efficiency savings. Modular and prefabricated houses can be almost entirely constructed in a factory environment. This means the construction process is up to three times faster than existing house-building methods, saving time, labour costs, and

increased efficiency. Since the majority of the construction process is completed within a factory setting, weather delays are eliminated. Tasks can occur simultaneously with onsite and foundation works being completed at the same time that fabrication is completed. This gives developers a much more accurate build schedule, and reduces the risk of costly over-runs. All sectors across the development industry should unite in support of modular technology.

Whilst standardised modular formats will not be appropriate in all locations, and many environments will require a bespoke design solution requiring traditional materials and means of construction, as for example in or adjacent to Conservation Areas, there will be some environments where modular construction will be acceptable.