

Wider South East Officer Working Group
Friday, 17 June 2016, 11:00 – 13:00
Committee Room 5, City Hall, Queen's Walk, London

Agenda

1 Terms of Group, Membership and Apologies

Terms of new Officer Steering Group:

http://www.london.gov.uk/sites/default/files/wider_se_officer_wg_-_terms.pdf

Political Steering Group meetings (previous 10 March, next 18 July). For details:

<http://www.london.gov.uk/about-us/organisations-we-work/policy-and-infrastructure-collaboration-across-wider-south-east> .

2 Notes of 5 February 2016 meeting (Jorn Peters, GLA)

Draft for agreement

3 Barriers to Housing Delivery (Nick Woolfenden, SEEC)

Paper attached for discussion

4 Strategic Infrastructure Improvements (Jorn Peters, GLA)

Working draft paper for discussion

5 Common Understanding of Evidence Base

a) GLA Demographic Projection Model Update and Workshop feedback (Ben Corr, GLA) – including 14 June Workshop paper

b) East of England Proposal for working towards Joint Technical Work Programme (James Cutting, EELGA)

c) Local Plan Expert Group (LPEG) Recommendations – common themes and next steps (All)

6 London Plan Review Update (John Lett, GLA)

Verbal update

7 AOB including Sub-National Transport Bodies

Next meeting:

Fri 9 September 2016, 13:30 – 16:00, Committee Room 5, City Hall, London

Item 2 Wider South East Officer Working Group

NOTES OF 9th MEETING OF SSPLOG

Held on 5 Feb 2016 at 14.00 at Committee Room 5, City Hall, London

Present:

Richard Linton	GLA Planning (Chair)
John Lett	GLA Planning
Jorn Peters	GLA Planning
Jack Straw	Surrey Planning Officers Association/Mole Valley DC (Deputy Chair)
Richard Hatter	Thurrock Council (Chair of East of England SSPOLG)
Sue Janota	Surrey County Council
Des Welton	Hertfordshire Planning Officers Group Co-ordinator
Alison Bailey	Buckinghamshire Planning Officers Group/South Bucks DC
Mark Aplin	Kent Planning Officer Group / Dartford BC
Matthew Jericho	Essex County Council
Claire Stuckey	Essex Planning Officers Group/ Chelmsford BC
Andrew Taylor	Uttlesford District Council
Cinar Altun	East of England LGA
John Cheston	Sussex Planning Officers
James Cutting	Suffolk County Council
John Williamson	Cambridgeshire & Peterborough Joint Strategic Planning Unit
Steve Barton	West London Alliance/West London Planning Policy Group/LB Ealing
Katharina Winbeck	London Councils
John McGill	London Stansted Cambridge Consortium
David Jowsey	Transport for London
Ben Corr	GLA Demography

Apologies:

Paul Donovan	Hertfordshire County Council
Carolyn Barnes	Bedford Borough Council
Tom Marchant	Kent County Council
Sarah Hollamby	Berkshire Heads of Planning/Wokingham
Bryan Little	Berkshire Heads of Planning/West Berkshire Council
Stephen Walford	Buckinghamshire County Council
Bev Hindle	Oxfordshire County Council
Nick Woolfenden	South East England Councils
Steve Barton	West London Alliance/West London Planning Policy Group/LB Ealing
Tara Butler	South London Partnership/LB Merton

2 Notes of the meeting of 30 November 2015

Notes were agreed. Identified actions are complete/ underway.

ACTION: Specifically on Item 5 Action, GLA will help SEEC/EELGA with regards to data sources to establish a pipeline of planning permissions for their area.

Website: The GLA website is undergoing a complete review. An independent wider South East website, which is hosted on the GLA website, is now up and running. It can be viewed

via the following link: <http://www.london.gov.uk/about-us/organisations-we-work/policy-and-infrastructure-collaboration-across-wider-south-east>]

3 2nd Wider South East Summit follow up

Meeting notes of the Summit had been circulated and noted.

Moving forward, now focus on Political Steering Group meeting on 10 March. Membership of Political Steering Group was noted.

4 Work Programme – preparation for Political Steering Group

a) London Plan Review

John Lett reiterated indicative timetable for a review of the London Plan:

- Initial high-level consultation – Autumn 2016
- Full draft consultation – Summer/Autumn 2017
- Examination in Public – Summer/Autumn 2018
- Adoption and publication – Summer/Autumn 2019

John Lett also presented emerging GLA industrial land baseline study (presentation provided separately *and final version now available in the 'Economy' section of this GLA website:*

<https://www.london.gov.uk/what-we-do/planning/london-plan/london-plan-technical-and-research-reports>). It forecasts a continuing trend of significant loss of industrial capacity

within the capital. The study also maps the scope of industrial land capacity beyond London's boundaries, and there may be scope for relocation of industrial land and related job opportunities to areas outside London. A complementary industrial demand study is expected to commence later this year and will be informed by the latest employment projections. Group members indicated that age and quality of the industrial land also need to be understood.

b) Common understanding of evidence

Ben Corr presented an update on the GLA's emerging demographic model (presentation provided separately), which mimics the widely used ONS model. Applying a longer-term 12-year historic migration trend (instead of 6-year used by ONS), as many SHMA consultants now do and as the GLA is referring to in its DtC responses to Local Plans, could lead to 8% lower household growth across the WSE. However, for individual authorities, in particular within the north and south of the WSE, higher levels of household growth could be the result.

Initial positive discussions with ONS have taken place. They are keen to explore the potential of the model. Due to their resource constraints, a potential validation through academic experts is being considered. The model results could potentially also be used for other commercial data sets (e.g. POPGROUP). Group members highlighted that the model would have to be accompanied by transparent explanations and that PINS is independent

from Government raising again concerns about potential impacts on Local Plan preparation. ONS' own new set of projections are likely to be published in early Spring 2016, but no methodological change is expected.

ACTION: GLA is refining its model and will then explain and discuss it, initially with technical experts from across the WSE.

Richard Hatter provided a brief update on the evidence 'stocktake', which had been circulated at the previous meeting. In its current form it represents an informal overview, but further work would be required on its analysis and interpretation.

c) Barriers to housing delivery

Andrew Russell, GLA, presented emerging Outer London Commission Report (presentation provided separately), which is currently awaiting input from Commissioners, before being finalised in March 2016 for publication (*final report now available on this website: <https://www.london.gov.uk/about-us/organisations-we-work/outer-london-commission-olc/olc-and-full-review-london-plan>*). During the following discussion it was specifically highlighted that all potential impacts of the 'use it or lose it' concept have to be understood. Group member also felt that the type of housing was an important factor to consider. Access to finance represents a significant challenge, in particular for small house builders. It was also highlighted that the planning system still has its role to play in terms of helping to improve delivery. Following the consideration of this issue by the Political Steering Group a joint representation to Government should be explored. It should include case studies from all areas of the WSE. There could potentially also be synergies with individual devolution bids that are currently being pursued.

Via e-mail Nick Woolfenden provided an update on emerging ideas from SEEC. They had discussed the issue with the LGA Chairman and representatives from Barratts. Initial issues for further exploration may include discretionary incentives/powers to encourage timely delivery of plans/permissions; improving capacity and skills in the building industry; ensuring that infrastructure capacity is keeping up; and considering how to achieve a better mix of large and small developers.

ACTION: A paper about this issue should be presented the Political Steering Group.

d) Making case for strategic infrastructure

John McGill of the London Stansted Cambridge Consortium (LSCC) presented an overview of their activities (presentation provided separately). The Consortium brings together key players from the area. Jointly they seek to make the economic case for key transport schemes also helping to deliver significant numbers of homes and jobs. Group members highlighted similarities with strategic devolution bids in different parts of the WSE and indicated the Consortium's bottom-up approach could provide a helpful context. Members also indicated the importance of orbital routes, such as those included in the emerging South East's 'Missing Links' report, alongside the radial corridors.

ACTION: A paper about this issue should be presented the Political Steering Group.

5 Review of SSPOLG membership and terms

Jorn Peters, GLA/Secretariat, presented draft options for a membership review (presentation provided separately). Many Group members indicated a preference for 'Option B' with 8 members per region, and with up to two additional representatives for the South East due to their significantly higher number of local authorities. The Group would, however, not vote on the issues discussed. Identifying the individual Group members would be up to the different regions, and there should be flexibility in terms of sending experts on relevant agenda items to the meetings. Specific project groups on key issues could also be introduced.

It was also confirmed that the GLA should continue its role as Secretariat. However, there should be closer collaboration on meeting preparation, in particular with SEEC, EELGA, London Councils. The process of preparing papers for the Political Steering Group also requires clarification.

ACTION: SEEC, EELGA and GLA/London Councils should facilitate the membership review/nomination process for the three regions individually taking the above into account. The Group's Terms of Reference also have to be reviewed and the meeting preparation process needs formalising to ensure better collaboration.

6 AOB

Late Friday afternoon meetings should be avoided to ensure maximum participation.

Addressing Barriers to Housing Delivery

What's the problem?

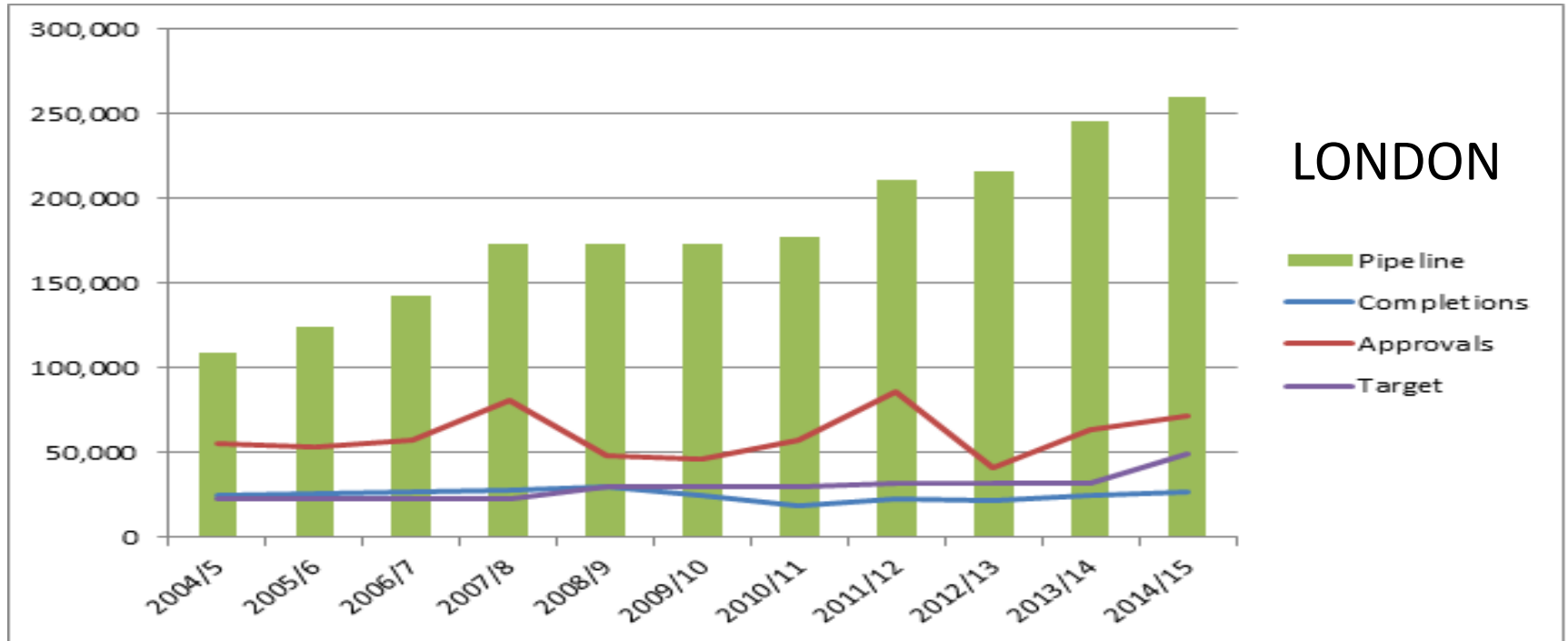
- Members agree a challenge for us all – South East, East & London – turning locally-approved housing permissions/plans into reality.
- Industry often slow to build out; infrastructure challenges; capacity/skills issues.
- Barriers to be tackled. But planning system is not the constraint on delivery...



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Housing delivery: Targets & permissions vs delivery



- London - Planning approvals well above London Plan target, but completions well below target.
- Recent LGA research, unimplemented permissions (units):
SE = 67k, E = 40k, L = 111k



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Addressing Barriers to Housing Delivery

How can we tackle the problem?

- **A) Industry delivery capacity and approach**

Issues: Business model/land banking; limited competition; skills.

Solutions? Incentivise build-out eg charge council tax; increase SME opportunities; local skills funding control.

- **B) Public sector capacity and finances**

Issues: Affordable home delivery; planning dept. capacity.

Solutions? More funding/powers for LAs to secure affordable homes; locally set planning fees.

- **C) Infrastructure**

Issues: Capacity/investment issues.

Solutions? Funding powers to accelerate investment.



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Addressing Barriers to Housing Delivery

Possible next steps/actions for Political Steering Group to consider?

- Joint lobbying eg. short report to Government/others re discretionary local powers needed.
- Co-operation and sharing of good practice.
- Engaging industry.

Other wider linked issues eg.

- **strategic infrastructure investment** (item 4)
- **housing land availability/opportunities/constraints**

eg. Green Belt, enviro designations, employment vs housing, delivering 'right' mix of homes etc...



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WSE POLITICAL STEERING GROUP

DRAFT REPORT ON TACKLING BARRIERS TO DELIVER LOCALLY APPROVED HOUSING PLANS/PERMISSIONS

1. Introduction

- 1.1. One of the core priorities of the Wider South East (WSE) Political Steering Group is to explore opportunities for collaborative working with a view to overcoming barriers to delivery of locally agreed housing plans/permissions.
- 1.2. At its last meeting in February 2016, the WSE Political Steering Group tasked officers to draft a report collating key learning from recent publications on barriers to housing delivery. This report sets out some of the common themes and key recommendations for encouraging and incentivising housing delivery arising from recent reports, and identifies possible opportunities for collective working across the WSE.
- 1.3. WSE Council leaders and the Mayor of London want to find ways to tackle barriers to ensure locally-approved plans/development progresses as swiftly as possible, alongside necessary infrastructure. Several recent reports have addressed the barriers to delivery, for example the Mayor of London's Outer London Commission 'Removing the Barriers to Housing Delivery' (March 2016); IPPR London Housing Commission 'Building a New Deal for London' (March 2016); SEEC/Localis work 'Clearing the Hurdles' (2013); and SEEC has recently raised the importance of turning permissions into actual homes with Government and Local Plans Expert Group. The National LGA has also established a Housing Commission to look at barriers to housing delivery, however recommendations have not yet been published.

2. Recommendations

- 2.1. Political steering group members are asked to discuss and agree key issues that need addressing, and what policies/powers would help do this.
- 2.2. Priority collaborative actions to take forward including Joint lobbying, Co-operation/ sharing of good practice, and engaging industry are set out under paragraph 5 below.

3. What are the barriers to housing delivery?

- 3.1. The Wider South East collectively makes up the top three areas for housing growth in England. However there are a growing number of unimplemented units with planning permissions reaching 218,089 across the WSE. SE had 66,751, East had 40,330 and London 111,008 in 2014-15 (source: LGA study 2016). The spreadsheet attached separately as **Annex A** compares at local authority level housing need (household projections) and planning approvals (to be completed for East and South East of England using LGA study data) with housing supply (additions to housing stock) for Greater London, East of England and South East.

3.2. Some of the challenges hindering delivery of locally approved housing plans and permissions arise from:

A. Industry delivery capacity and approach

A1. The business model for building for private sale promotes slow building and release onto the market. Also concerns about Land banking, and speculative promoters slowing down development and increasing land prices.

A2. Limited competition within the building industry undermines competition. SMEs struggle to access finance for Brownfield clean-up and cannot compete with large developers where there are high land prices.

A3. Skills shortages in sectors relevant to the house building industry.

B. Public sector capacity and finances

B1. Insufficient finances to build affordable homes and homes for rent at scale.

B2. The need to ensure sufficient capacity in planning departments and maximise efficiency of the planning system, while avoiding constant change as this creates uncertainty for developers and undermines delivery.

C. Infrastructure

C1. Slow progress/ existing deficits on infrastructure investment and delivery. Including slow or no investment on upgrading road and public transport links that could unlock sites for jobs and housing growth.

3.3. Action is needed to address the under-delivery of locally approved permissions/plans. The Government's Housing and Planning Act received royal Assent and the Local Plans Expert Group (LPEG) have proposed measures re Local Plan preparation; Government has set a deadline of 'early 2017' for Local Planning Authorities to produce a plan, however many in local government are concerned that these do not address the major problem of approved housing permissions/plans not being delivered.

4. What opportunities are there for collaboration?

4.1. This report draws on a number publications in recent months relating to barriers to housing delivery with the aim of highlighting a range of measures and recommendations that provide opportunities for active collaboration across the WSE to tackle these challenges.

Industry delivery capacity and approach

4.2. **[A1] Incentivising build out rates and tackling genuine land banking:** With regards incentivising build out rates and tackling genuine land banking. Where there are no outstanding issues preventing start of development and where house production has not commenced within 3 years, OLC and SEEC both called for CPO action or a tax mechanism (eg equivalent of council tax) on unbuilt approved properties in order to incentivise delivery. Councils in the East and South East may like to see a shorter period than 3 years,

an option which could also be explored collectively. Councils may also support the use of discretionary powers to tax land that remains undeveloped as proposed in the work by SEEC and Localis. Other support could include, planning support for stalled schemes that are not progressing or keeping a register of non-planning barriers which are holding back housing production on large sites and addressing these issues once resources and funding become available

SEEC members and TFL are also interested in ensuring promoters are encouraged to push sites ahead to build stage. They are worried that promoters focus on maximising profit on their land at the expense of delivering houses quickly. Potential incentives include encouraging promoters to partner with a developer before granting planning permission and allowing councils to levy charges when sites remain undeveloped.

- 4.3. **[A1] Improving the speed and certainty of the planning system:** The OLC and SEEC have also recommends that local authorities be given more flexibility to set their own planning application fees locally to ensure that there are sufficient public sector planning resources to drive the necessary levels of housing and economic growth. Councils in London, the East of England and South East would welcome such flexibility, and this may be an issue on which the WSE Political Steering Group wishes to take collective action.
- 4.4. **[A2] Increasing competition in the house building industry:** Limited competition within the building industry undermines incentives to build. Opportunities for collaboration across the WSE may exist with regards to enabling finance to support more SMEs, and supporting innovative council-led partnerships/alternative development models (eg LLPs) and smaller developers, by giving them first refusal to a proportion of small public sites for development.
- 4.5. **[A3] Enhancing the capacity of the house building industry:** Councils should work closely with the construction industry, educational and training providers, Government and the LEPs to ensure sufficient numbers of construction workers and skilled construction workers and trade people to deliver the increased volume of new build housing that is required. As a next step, it would be beneficial for the WSE to engage LEPS and partners collectively to explore how the public and private sector can work better collectively to address these challenges, and possible joint lobbying for local authority control of adult skills budgets to better target funding to the training needed/grow the construction sector workforce. Developing skill programmes as part of major infrastructure projects, similar to that set out in the TfL Housing Prospectus may also provide opportunities for the WSE.

Public sector capacity and finances

- 4.6. **[B1] Boosting housing delivery by local authorities:** local authorities could play a key role in closing the gap between current rates of housing completions by the private sector and housing associations and London's overall housing need. Local authorities should be able to apply to government for more HRA borrowing headroom in order to deliver new homes by demonstrating a viable, costed and deliverable business plan is one that is likely to be viewed positively by councils across the WSE and provides a further opportunity for joint action across the WSE

- 4.7. **[B1]** The London Housing Commission report suggest that the Mayor of London should issues London wide guidance on negotiating affordable housing with developers. It is evident that the provision of affordable housing is a key priority for the Mayor of London, as it is for the WSE as a whole. As such it is recommended that the WSE political steering group might wish to consider working collectively on producing guidance on negotiating affordable housing with developers which can be utilised by councils individually and collectively.
- 4.8. **[B2] Locally set planning fees** - Councils want to deliver effective, efficient planning services to ensure appropriate development progresses swiftly. However, in a high-cost area such as the Wide South East, current fees mean developers' application costs are subsidised by public funds. A new ability for councils to set planning fees locally to cover the cost of processing applications would enable them to deliver the best possible service to help progress the development needs of their areas.

Infrastructure

- 4.9. **[C1] Accelerating Infrastructure Delivery:** Greater fiscal devolution to the Mayor of London and to Local Authorities across the Wider South East can boost local infrastructure provision and enable local authorities to forward fund essential infrastructure needed to derive housing and economic growth. Revision of CIL regulations allow charging authorities to borrow against future CIL income and use CIL receipts to repay interest on loan finance, which is currently prohibited. Devolution of further fiscal powers to councils across the WSE would be of benefit not just to London but to councils across the WSE. The relaxation of the rules surrounding the use of CIL, local authority discretion to charge developer contributions on sites of all sizes and national investment to support schemes that are too big for local funding could also enable more housing and economic growth.

5. Next Steps for WSE Collaboration

- 5.1. There are a number of opportunities for collaboration, and in light of limited resources it is recommended that the WSE Political Steering Group agree to a phased approach to collaboration and joint lobbying.
- 5.2. It is suggested that the WSE Political Steering Group consider:

Joint Lobbying

- 5.3. Joint Lobbying for devolution of fiscal powers to councils across the WSE and the Mayor of London, including relaxation of the rules surrounding the use of CIL, local authority discretion to charge developer contributions, national investment for schemes too big for local funding, more headroom for HRA borrowing and local authority control of adult skills budgets. 7
- 5.4. A Short report to government and other key partners, making case for key actions discussed/agreed above.

Cooperation and Sharing of Good Practice

- 5.5. Learning and good practice could be shared in order to support councils to improve action across the WSE (For example, local case studies of stalled sites that have been incentivised to move forward).

Engaging Industry

- 5.6. Jointly developed guidance on negotiating affordable housing with developers to secure more affordable housing in London and the WSE.
- 5.7. In taking work forward, industry input (including via LEPs) may be helpful to help shape next steps/progress recommendations, particularly on enhancing the capacity of the house building industry and increasing competition to enable SMEs to play a more active role in the delivery of housing.
- 5.8. Coordinated lobbying on infrastructure, including “growth corridors” is tackled in a separate paper.

June 2016

Strategic Infrastructure Improvements Political Steering Group

- Importance of strategic infrastructure improvements across the WSE
- Considerable combined lobbying power
- Need to focus resources on just a few strategic infrastructure areas/schemes



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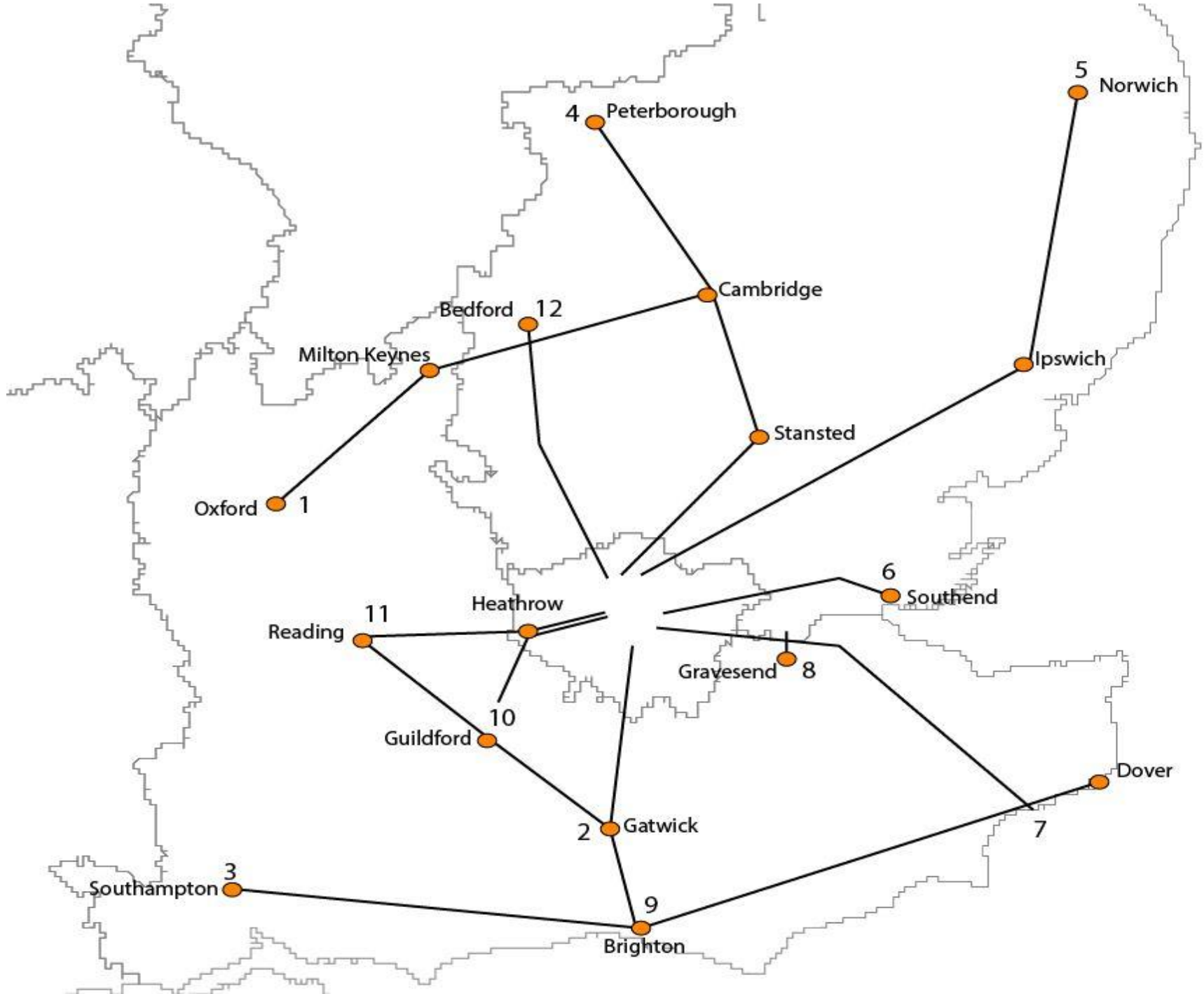


Long List of Areas/Schemes

- Strategic and local benefits
- Existing commitments
- Indicative cost and funding gap
- Actions needed to assist (what, when, who to target)

Long List of Areas/Schemes

1. East West Rail (Oxford -Cambridge)
2. North Downs Rail Link (Gatwick – Reading)
3. A27/M27/A259 (Dover – Southampton)
4. West Anglia Mainline and Crossrail 2 North (London – Stansted-Cambridge-Peterborough)
5. Great Eastern Mainline (London – Ipswich – Norwich)
6. Thames Gateway Essex: C2C and Crossrail 2 – Eastern Branch (London – South Essex / London Gateway Port)
7. Thames Gateway Kent: Crossrail 1 extension East and HS1 route (London – North Kent – Channel Tunnel)
8. Lower Thames Crossing
9. Brighton Mainline (London – Gatwick – Brighton)
10. South West Mainline and Crossrail 2 South West (London – Surrey / southern access to Heathrow)
11. Great Western Mainline and Crossrail 1 West (London – Reading / western access to Heathrow)
12. Midlands and West Coast Mainline (London – Luton – Bedford / Milton Keynes)



Criteria for Shortlisting

- Strategic cross-boundary benefits
- Local priorities
- Deliverability including innovative funding
- Degree of WSE collaborative support valuable

Overview of modelling workshop

Wider South East Officer Working Group meeting

17th June 2016



Model requirements

- Provide consistent projections for local authorities across the wider south east region
- To be able to produce projections methodologically consistent with ONS/DCLG
 - Facilitate comparison and use in official planning work
- Allow users to explore range of scenarios
 - Fertility, mortality, migration
 - Household formation
- Include tools for visualisation/QA

Short term vs Long term

Impact of selecting long term over short term variant

Region	Difference in population ST - LT 2041	Difference in households ST - LT 2041	Difference in annualised hh's ST - LT 2015-2041
London	-391,140	-222,200	-8,162
South East	-16,240	-24,620	-904
East	13,250	4,070	158
Total	394,100	242,750	-8,908

Negative values indicate Long term variant projects less than Short term variant

Validation of model

- Internal checks
 - Still ongoing
- Engage with colleagues across wider region
 - agree on mutually useful scenarios to explore
- Work with ONS/DCLG/academia to gain independent expert validation
 - Currently awaiting response from ONS

Next steps

- **June** - publish first outputs
 - Only plan to publish results for London
- **July** – update model with data from 2015 MYE
- **August** – publish updated projections
- **Autumn** - Integrate:
 - District housing-linked models
 - Small area projection models (ward and MSOA)

East of England Proposal for working towards Joint Technical Work Programme

Officers representing authorities in the East have agreed to invite the GLA and South East Authorities to collaborate on elements of technical work, based largely on the modelling approaches the GLA has already undertaken. Collaboration is vital to promote a positive shared approach to provide the necessary confidence to all elected members, but this now needs to be scoped and programmed in order to make progress.

GLA Demographic Model (see also Item 5a)

Subject to any agreed items arising from the Technical Workshop on 14 June 2016, the GLA's demographic model is likely to be a significant shared resource that could be used throughout the Wider South East. However, reaching agreement on the use of the GLA's model (and other modelling approaches) is likely to depend on whether various questions and concerns can be addressed.

Therefore, it appears to be incumbent on the GLA to set out steps to address concerns, which might include:

- An independent validation report setting out the degree to which the model aligns with that used by ONS, and
- A published forward programme highlighting release dates and outputs from scenarios.

These steps could work towards reaching agreement throughout the wider south east on how the results for the GLA's model will be used in the preparation of future Strategic Housing Market Assessments.

Witan Project

It is clear that the linkages between economic growth, the labour market, commuting and demographic trends will be made. At the SSPOLG meeting in February 2016, the GLA did confirm that it will be using economic data from ONS's National Accounts (Blue Book), which also drives other forecasting models such as the East of England Forecasting Model (EEFM). Comparisons will be made between modelling approaches, particularly, the EEFM. This raises questions about: (1) how models relate to each other, and (2) which is more appropriate to use for different purposes.

Given the role of the EEFM to authorities in the East, there is need to address the above points and authorities in the East are considering commissioning Cambridge Econometrics to review the GLA's Witan Project and compare it to the East of England Forecasting Model. However, there is a case to review all modelling approaches independently, and views from the GLA and the South East are sought on whether there is scope for collaboration on such an independent review.

Ongoing demographic resources and collaboration on scenarios

Given the complexity of modelling approaches and the interaction of economic and social factors that frequently change, officers in the East consider there to be a need to have an ongoing hands on demographic support to the collaboration programme. There is scope to align this support with gaining better understanding of the influences effecting migration patterns. A better understanding of such influences is vital to inform and collaborate on the economic/demographic scenarios.

This issue, including joint academic research, was raised with the Wider South East SSPLOG on 30 November 2015. "Participants attending agreed that this could be useful but highlighted that it would be important to examine first relevant research that already exists or could be carried out amongst the authorities themselves."

The authorities in the East have set aside some funds to undertake research and, given the limited capacity for authorities to undertake an examination of relevant research, this area for collaboration is still required but needs to be scoped and developed further.

Officers from the East have agreed to develop the scope of the research and the ongoing demographic support and invite the GLA and SEEC to collaborate forming the brief, identifying organisations to undertake this activity and sharing the cost.

James Cutting

East of England Coordinator

June 2016