

Representation	Officer Response
<p data-bbox="188 316 712 344">P4: Private rented homes (Amended policy)</p> <p data-bbox="188 357 412 421">Organisation: GLA NSPPSV66</p> <p data-bbox="188 466 488 494">P4 Private rented homes</p> <p data-bbox="188 536 1111 600">Please note the Further Suggested Change to Matter 29 regarding requiring a proportion of affordable housing as low cost rent on Build to Rent schemes.</p>	<p data-bbox="1140 357 2051 459">It is noted that Matter 29 sets out that boroughs can require a proportion of affordable housing as low cost rent (social rent or London Affordable Rent) on build to rent schemes which must be managed by a registered provider.</p> <p data-bbox="1140 501 2051 603">Policy P4 requires the provision of 35% affordable housing to be provided on private rented schemes with 15% to be social rented equivalent and 20% to be affordable rent at London Living Rent equivalent.</p> <p data-bbox="1140 644 2016 820">We do not require social rented equivalent homes to be managed by a registered provider as this is likely to be a small proportion of units and therefore it will be difficult to get a registered provider to manage these properties. The Section 106 agreement will ensure these are delivered at social rent levels and remain in perpetuity.</p>
<p data-bbox="188 865 815 928">Organisation: DP9 on behalf of BL CW Holdings Ltd NSPPSV336</p> <p data-bbox="188 970 1111 1327">We welcome the more flexible approach to affordable housing delivery associated with build to rent schemes and suggest that this type of approach would be suitable for all housing products within opportunity areas. We reiterate comments in our previous representation letters to date requesting that Paragraph 1.6 should be amended to indicate a minimum term of 15 years to ensure PRS development in the borough is capable of attracting funding and is therefore deliverable (and effective in accordance with Paragraph 182 of the NPPF). This policy requirement is not sound as it is not consistent with regional guidance, in the form of the Mayor's Affordable Housing and Viability SPG 2017.</p> <p data-bbox="188 1369 1043 1433">These representations are submitted alongside and should be read in conjunction with the comments submitted by British Land in relation to</p>	<p data-bbox="1140 970 2065 1072">Noted. The 30 year term is considered necessary to provide more security for tenants in the private rented sector than the 15 years set out in the Draft London Plan.</p>

previous iterations of the New Southwark Plan.	
<p>Individual NSPPSV337</p> <p>No further comment applied</p>	Noted.
<p>Organisation: Rolfe Judd Planning on behalf of Criterion Capital NSPPSV342</p> <p>The amended wording for policy P4 seeks to remove the requirement to provide Affordable Rent units for household incomes between £60,000 and £90,000. The draft London Plan also includes a policy relating to Build to Rent schemes (policy H13) which allows the affordable housing offer to be entirely Discounted Market Rent (DMR). This model of Build to Rent schemes as set out in the London Plan addresses the needs of middle-income earners (i.e. those earning £60,000 to £90,000) who cannot afford to buy a home but are not eligible for social rent. By removing this upper level of Affordable Rent from policy P4, that social group are at risk of being excluded from private rented developments as they may not be able to afford full market price but are not eligible for other affordable products.</p> <p>There is an identified need to provide housing for this social group, as well as low income earners, as outlined within the London Plan and London SHMA. Removing the Affordable Rent tenure for household incomes between £60,000 and £90,000 per year would fail to address this need. The proposed changes to Policy P4 to remove this affordable housing product and would therefore not be consistent with national policy as it would contradict draft London Plan policy H13 . It is also not positively prepared as it would not address the objectively assessed need to provide homes for middle earners (i.e. those on a yearly household income of between £60,000 to £90,000). The proposed amendments to policy P4 therefore do not pass the test of Soundness. Inclusion of Affordable Rent for household incomes of £60,000 - £90,000 per year as an appropriate affordable housing product in Table 3 and return the percentages to those previously proposed (12% for social rent,</p>	<p>The higher income band of affordable rent for household incomes of £60,000-£90,000 per year has been removed to comply with the draft London Plan which caps the income for intermediate rented products such as London Living Rent and Discount Market Rent homes at £60,000.</p> <p>Housing needs of residents of incomes between £60,000-£90,000 can be met by affordable home ownership products and also on the open market.</p>

<p>18% for London Living Rent and 5% for Affordable Rent for household incomes of £60,000 - £90,000)</p>	
<p>Organisation: TfL Commercial Development NSSPSV182</p> <p>TfL CD has previously stated that the NSP policy in respect of ‘build to rent’ (BtR) development should accord with the Mayor’s SPG Homes for Londoners: Affordable Housing and Viability, 2017. Since then, the DLP has introduced a very similar planning policy. The Mayor is promoting a consistent approach within London to encouraging BtR development and we therefore reiterate that the Council’s policies in respect of BtR should be consistent with ‘Homes for Londoners’ and the DLP, including the definition of BtR schemes. Please see our representation letter of 13 September 2017 for further details.</p>	<p>Policy P4 has been introduced to provide more security than the Draft London Plan which has a threshold of 50 units and only a 15 year covenant. Policy P4 has a threshold of 100 units and a 30 year covenant. Unlike the Draft London Plan, Policy P4 requires social rent equivalent to be provided, however, the Draft London Plan encourages solely Discount Market Rent, preferably London Living Rent. Given the need for social rented units, this is a requirement of Policy P4. The Draft London Plan at Policy H13 sets out that, Boroughs may set their own local threshold to reflect local housing market circumstances and affordable housing need.</p> <p>Policy P4 has been amended to require 20% affordable rent at London Living Rent equivalent and 15% social rent equivalent. London Living Rent is required as there is a Council Plan commitment to secure new 1,000 London Living Rent homes by 2022 Social rent equivalent is required, given the identified need for social housing in Southwark. The higher bracket of between £60-90,000 incomes per year has been removed in accordance with the draft London Plan.</p>
<p>Organisation: CBRE NSPPSV344</p> <p>Policy P4 provides a specific policy on private rented homes. The provision of a specific policy for this sector is supported in recognition that the private rented sector provides an alternative model to traditional developments. However, this policy has now been amended to remove the affordable rent tenure previously identified for household incomes between £60,000-£90,000 per year and the social rent and affordable rent requirements increased.</p> <p>As set out in our previous representation dated 27th February 2018, the policy already sat in contrast to Draft London Plan Policy H13 on Build to Rent which provides different affordable housing requirements and allows the</p>	<p>The higher income band of affordable rent for household incomes of £60,000-£90,000 per year has been removed to comply with the draft London Plan which caps the income for intermediate rented products such as London Living Rent and Discount Market Rent homes at £60,000.</p> <p>Housing needs of residents of incomes between £60,000-£90,000 can be met by affordable home ownership products and also on the open market.</p>

affordable housing offer to be solely Discounted Market Rent and if following the fast track route as least 30% should be London Living Rent. The policy was already more challenging than Draft London Plan policy, and the further NSP amendments have made the delivery of build to rent even more challenging.

In order to ensure consistency with the Draft London Plan Policy H13 and to encourage the development of this sector we consider that Policy P4 should be amended to be consistent with the requirements of the Draft London Plan.

Individual
NSPPSV348

We reiterate our opposition to this policy, which should be removed. Self-contained, private rented home developments should be subject to the requirements of P1, as they were in earlier versions of the draft NSP. No evidence has been presented to demonstrate the need for Build to Rent developments, as opposed to market demand for BtR. We note in particular the lower social rent requirement, compared to P1 (which is in any event only an 'equivalent' social rent). 1.4 Tenure should not be time limited.

1.6 Replace 'secured for the rental market for a minimum 30 year' term' with '...in perpetuity'

1.7 Remove all words from 'or Table 3 ...' onwards and replace with words '...or the maximum reasonable viable amount, whichever is the greater'.

2. Delete 'equivalent' after 'social rent' and '...London Living Rent'

Table 3:

Remove 'equivalent' after social rent and London Living Rent.

Change 'a minimum of 15%' to 'a minimum of 25%' social rent (to bring into line with P1).

Change 'a minimum of 20%' to 'a minimum of 10%' London Living Rent (to bring into line with P1).

Policy P4 gives flexibility to the tenure of affordable housing permitted, either the affordable housing requirements set out in P1 can be provided or in P4.

The draft London Plan allows the affordable housing offer to be solely discount market rent. It also states that boroughs can require a proportion of affordable housing as low cost rent (social rent or London Affordable Rent) as per Policy H7A. Given the acute need of social rent housing in the borough, Policy P4 seeks the provision 15% social rent equivalent in private rented scheme instead of all Discount Market Rent as suggested in the Draft London Plan.

Private rented schemes are likely to be managed by one operator, therefore social rent equivalent and affordable rent capped at London Living Rent equivalent is expected to be provided.

<p>Organisation: DP9 Ltd NSPPSV04</p> <p>No further comment applied</p>	<p>Noted.</p>
<p>Individual NSPPSV50</p> <p>New developments of private rented homes are not solving housing problem and they are creating new types of problems that aren't needed. This sector does not deliver enough social and genuinely affordable housing. It's purpose is just another 'housing product ' to drive up profits for developers. Heavily regulate this sector.</p>	<p>In conformity with the Draft London Plan, Policy P4 is required in the New Southwark Plan. This is a stronger policy than in the Draft London Plan as it requires the provision of social rent equivalent homes, a 30 year covenant and a higher threshold (100 units) in comparison to the Draft London Plan which permits solely discount market rent, has a 15 year covenant and 50 unit threshold.</p>
<p>Organisation: DP9 NSPPSV352</p> <p>1.7 states that developments must provide affordable homes in accordance with P1 or Table 3, subject to viability. A failure to apply a flexible approach to the split based upon site specific circumstances will impact on the delivery of affordable homes, particularly in large, mixed-used developments. Unlike policy P1, there is no reference to a flexible approach being applied to the mix targets included within the supporting text and this flexibility should be included for the policy to be sound and consistent with other policies.</p> <p>1.7 also states that “where the provision of private rented homes generates a higher development value than if the homes were built for sale, the minimum affordable housing requirement will increase to the point where there is no financial benefit to providing private rented homes over built for sale homes”. LBS recognises that the private rented sector meets the housing needs of residents who cannot afford to, or do not want to buy homes in Southwark, and as such the Council wants to encourage professionally managed private rented products. This sentence is unnecessary, as private rented units are fixed to reflect market values, with the ability for rents to fall</p>	<p>The draft London Plan allows the affordable housing offer to be solely discount market rent. It also states that boroughs can require a proportion of affordable housing as low cost rent (social rent or London Affordable Rent) as per Policy H7A. Given the acute need of social rent housing in the borough, Policy P4 seeks the provision 15% social rent equivalent in private rented scheme instead of all Discount Market Rent as suggested in the Draft London Plan.</p> <p>It will be identified within the submitted viability assessment where there is a financial benefit to providing private rented homes over built for sale homes, if this is the case, it is expected that the provision of affordable housing will be increased so there is no financial benefit.</p> <p>A review is required to ensure the maximum viable amount of affordable housing is provided.</p>

in the future. 1.7 as drafted will deter the delivery of professionally managed private rented products, and this sentence should be deleted as it cannot be justified. So, Para 1.7 in its entirety should read as:

“Provide affordable homes in accordance with P1 or Table 3, subject to viability”.

Paragraph 1.8 should be amended to reflect the Mayors Homes for Londoners – Affordable Housing and Viability’ SPG. It should not be necessary for affordable housing reviews to be required where 35% affordable housing has been provided and implementation targets have been met.

Organisation: Elephant Amenity Network
NSPPSV57

We reiterate our opposition to this policy, which should be removed. Self-contained, private rented home developments should be subject to the requirements of P1, as they were in earlier versions of the draft NSP. No evidence has been presented to demonstrate the need for Build to Rent developments, as opposed to market demand for BtR. We note in particular the lower social rent requirement, compared to P1 (which is in any event only an ‘equivalent’ social rent)

Alternatively;

1.4 Tenure should not be time limited.

1.6 Replace ‘secured for the rental market for a minimum 30 year’ term’ with ‘...in perpetuity’

1.7 Remove all words from ‘or Table 3 ...’ onwards and replace with words ‘...or the maximum reasonable viable amount, whichever is the greater’.

2. Delete ‘equivalent’ after ‘social rent’ and ‘...London Living Rent’

Table 3:

Policy P4 gives flexibility to the tenure of affordable housing permitted, either the affordable housing requirements set out in P1 can be provided or in P4.

The draft London Plan allows the affordable housing offer to be solely discount market rent. It also states that boroughs can require a proportion of affordable housing as low cost rent (social rent or London Affordable Rent) as per Policy H7A. Given the acute need of social rent housing in the borough, Policy P4 seeks the provision 15% social rent equivalent in private rented scheme instead of all Discount Market Rent as suggested in the Draft London Plan.

Private rented schemes are likely to be managed by one operator, therefore social rent equivalent and affordable rent capped at London Living Rent equivalent is expected to be provided.

<p>Remove 'equivalent' after social rent and London Living Rent. Change 'a minimum of 15%' to 'a minimum of 25%' social rent (to bring into line with P1). Change 'a minimum of 20%' to 'a minimum of 10%' London Living Rent (to bring into line with P1).</p>	
<p>Individual NSPPSV355</p> <p>No further comment applied</p>	<p>Noted.</p>
<p>Organisation: Southwark Law Centre NSPPSV167</p> <p>At present, this policy is neither justified nor effective.</p> <p>We welcome the changes, however, the proportions for build to rent should be the same as for Policy P1: i.e. 25% of total should be social rent. We see no good reason why this cannot be so. Furthermore, reference to social rent 'equivalent' is not good enough. Instead, it should simply say actual social rent – with length of tenure. These tenants should have the same security of tenure as any others in the borough.</p>	<p>In conformity with the Draft London Plan, Policy P4 is required in the New Southwark Plan. This is a stronger policy than in the Draft London Plan as it requires the provision of social rent equivalent homes, a 30 year covenant and a higher threshold (100 units) in comparison to the Draft London Plan which permits solely discount market rent, has a 15 year covenant and 50 unit threshold.</p> <p>The draft London Plan allows the affordable housing offer to be solely discount market rent. It also states that boroughs can require a proportion of affordable housing as low cost rent (social rent or London Affordable Rent) as per Policy H7A. Given the acute need of social rent housing in the borough, Policy P4 seeks the provision 15% social rent equivalent in private rented scheme instead of all Discount Market Rent as suggested in the Draft London Plan.</p> <p>Private rented schemes are likely to be managed by one operator, therefore social rent equivalent and affordable rent capped at London Living Rent equivalent is expected to be provided.</p>

<p>Individual NSPPSV357</p> <p>See previous answers</p>	<p>Noted.</p>
<p>Organisation: Lichfields on behalf of U and I Group NSPPSV358</p> <p>No further comment applied</p>	<p>Noted.</p>
<p>Organisation: Gerald Eve LLP (on behalf of Grosvenor) NSPPSV74</p> <p>Grosvenor welcomes the inclusion of proposed Policy P4 as an important and pro-active step to enable Build-to-Rent development to contribute to the delivery of new homes in Southwark. However the provisions are considered onerous and will prove unachievable in practice. The proposed Policy 4 has been amended since the previous Submission Version of the Plan (December 2017) to increase even further the proportion of social rented equivalent (minimum 15%) and affordable rent capped at London Living Rent (20% minimum). This tenure split is inconsistent with the headline policy target in terms of the viability and economics of Build-to-Rent housing which are recognised in the New London Plan and Government guidance. It will not be deliverable in the context of build-to-rent housing delivery and its specific economic model, contrary to the strategic support at Government and London Plan levels.</p> <p>Through its planning application for the redevelopment of the former Biscuit Factory and Bermondsey Campus site, Grosvenor has been engaging with LB Southwark for the last two years regarding the implementation of proposed Policy P4, both the headline quantum of affordable housing and depth of discount. Grosvenor's application has recently had a resolution to refuse permission which would have brought forward 1,343 new homes (including affordable) and much needed investment in the area. Through this application, the workability of this draft policy has been tested in practice as</p>	<p>The draft London Plan allows the affordable housing offer to be solely discount market rent. It also states that boroughs can require a proportion of affordable housing as low cost rent (social rent or London Affordable Rent) as per Policy H7A. Given the acute need of social rent housing in the borough, Policy P4 seeks the provision 15% social rent equivalent in private rented scheme instead of all Discount Market Rent as suggested in the Draft London Plan.</p> <p>Updated viability testing has been undertaken to test the viability of the affordable housing requirements in Amended Policy P4. It concludes : the results of our appraisals including 15% of units as social rent equivalent and 20% of units at affordable rents capped at London Living Rent indicate that the proposed amendment to policy P4 will have a minor impact on the revenue and therefore value of PRS schemes. This reduction in revenue has not however changed the viability position as set out in the November 2017 Update Study. Our testing has demonstrated that in most instances PRS developments should be able to viably deliver affordable housing as part of the scheme as required by the emerging NSP through Policy P4.</p> <p>We will expect build to rent schemes to be of the same design standards as build for sale. Where there are other design features proposed for build to rent schemes that are not usually provided in build for sale these will be</p>

the Viability testing of the Council's own advisers could not achieve compliance with the proposed policy P4 for the scheme, reaching only 30% headline quantum under the previous P4 draft and only 27% headline quantum under the now proposed changes to P4.

There are therefore a number of aspects of Proposed Policy P4, which Grosvenor consider require amendment in order for the policy to be effective in supporting the supply of Build-to-Rent housing, and to be consistent with guidance at national and regional levels. These have been expressed in representations submitted on behalf of Grosvenor in response to previous consultation in November 2016 and February 2018.

The key concerns and suggested changes are set out in response to the question below. We suggest the following refinements to specific criteria in Policy P4 in order to make the policy more effective in supporting the delivery of Build-to-Rent housing.

- Criteria 1.3 – Design Standards.

We agree that Build-to-Rent housing should generally meet the same standards of design as build for sale homes. However, it should be acknowledged that there are some differences in the design approach for purpose built rental housing which can improve the quality of experience for private tenants and discount market rent tenants. In particular, this includes the provision of communal facilities for residents to encourage community building and social interaction. We would suggest an addition to the wording to state "meeting the same standards of design as build for sale, whilst reflecting the specifics of Build to Rent Housing and the demands of those renting"

- Criteria 1.4 – Tenancies for a Minimum of three years.

We support the proposal to provide private renters with the option to request a tenancy of up to three years with tenant's break clause if there is demand for this, but suggest that private renters should not be obliged to

considered on a case by case basis.

The break clause gives flexibility to the tenant and will allow them to reduce their tenancy as required.

The 30 year term is considered necessary to provide more security for tenants in the private rented sector than the 15 years set out in the Draft London Plan.

The clawback review penalty charge will be reflective of the financial benefit of the units being market homes.

Any planning application for build to rent homes will need to be supported by a viability assessment which will demonstrate the viability of a scheme providing 35% affordable housing.

take a three year tenancy if they would prefer a shorter term.

- Criteria 1.6 – Homes secured for the rental market for a minimum 30 year term.

The minimum 30 year term over which the private rented homes are to be secured is double the minimum 15 year term recommend by the GLA in proposed New London Plan Policy H13, and Central Government guidance. We would recommend that this is reduced to 15 years for consistency with national policy and the London Plan, and best practice.

We understand and support the need for a 'clawback' mechanism if the private rented/BTR homes are sold within the covenant period. However, the clawback should reflect the extent of any financial benefit secured by the Applicant of breaking the covenant. If there is no financial benefit (for instance where units are sold as 'market sale' but their value is equal or less than their value as BTR) there should be no 'charge'.

- Criteria 1.7 – Provide Affordable Homes in accordance with Table 3, subject to viability.

While fully supporting the need for Build-to-Rent housing to contribute toward the delivery of affordable housing, we have concerns that the requirements set out in proposed Policy P4 are too unachievable and will prove obstructive to the Build-to-Rent sector in Southwark.

The draft New London Plan and Government guidance recognises that the economics of BTR housing are distinct from private for sale housing. BTR developments rely upon income generated from rent over a long period, as opposed to profit realised upfront from the sale of new homes. Unlike private for sale housing, the BTR sector is in its infancy and there is limited evidence and data available to assess the likely financial performance of schemes.

In response to the New London Plan draft policy H13, and in the context of the distinct economics of BTR housing, various industry bodies including British Property Federation and London First have expressed concerns around the ability of BTR developments in London to deliver 35% affordable housing – a concern we share as expressed above and, as the Council’s own advisers have demonstrated in the context of Grosvenor’s application, is not achievable from a viability perspective.

Whereas the evidence base that supports the development of draft policy P4 is contained within BNPP’s September 2015 Viability Report and is limited being based on only one relatively small site-site.

The early stage of the BTR sector in London and Southwark, coupled with the limited evidence currently available to assess likely performance leads us to recommend that a flexible approach is adopted in the refinement and application of draft policy P4, with sufficient weight to be given to the “subject to viability” component of this draft policy.

As acknowledged by policy at all levels, the Build-to-Rent sector has a potentially important role to play in addressing the critical need to increase housing supply quickly, particularly for those who cannot afford or do not want to buy private homes, but are not eligible for traditional affordable housing products. However, in order for this potential to be realised, planning policy must recognise the distinct economics of the sector and ensure schemes are deliverable. Otherwise housing (including much needed affordable housing) will not come forward via Build-to-Rent schemes.

Individual
NSPPSV362

No further comment applied

Noted.

Organisation: Coin Street Community Builders

NSPPSV363

Although there are bad private landlords, it is important to expand the private rented market. We welcome the emphasis on greater security of tenure, professional management, and rent increases agreed in advance. We do not accept the provision in 1.7 that "the minimum affordable housing requirement will increase to the point where there is no financial benefit to providing private rented homes over built for sale homes". Similarly we reject the proposal in 2 that "Discount market rent homes at social rent equivalent must be allocated to households on Southwark's social housing waiting list. All other discounted market rent homes must be allocated to households on Southwark's Intermediate Rent Housing List". This attempt to give LB Southwark the right to prioritise allocation of all private rented housing in the area is wrong and flies in the face of the statement under 'Reasons' that "The private rented sector also benefits the local and regional economy as it enables greater household mobility". If CSCB offers a job to an applicant from Wales, should it make its job offer dependent on the applicant quickly rising to the top of Southwark's List? LB Southwark has its own priorities but so do others. It has long been the practice of housing co-operatives on CSCB's estate to offer LB Southwark a proportion of their nomination right. The proposed Southwark control over allocation of homes in the private rented sector is inappropriate. Delete second sentence of P4 1.7 and all of P4 2.

It will be identified within the submitted viability assessment where there is a financial benefit to providing private rented homes over built for sale homes, if this is the case, it is expected that the provision of affordable housing will be increased so there is no financial benefit.

The new intermediate rent housing list will help ensure any properties developed at these lower rents go to households in most need of these properties.

Organisation: Alvey TRA

NSPPSV379

No further comment applied

Noted.

Organisation: Liam Hennessy Architects

NSPPSV380

Part 1.7 of Amended Policy 'P4 private rented homes' states:
"Provide affordable homes in accordance with P1 or Table 3, subject to

Noted.

viability.”

Table 3 from Amended Policy ‘P4 private rented homes’ states:

“Table 3: Affordable housing requirement option on qualifying private rented homes scheme. Affordable housing: a minimum of 35%”

Policy P1 states:

“NB All homes in Southwark should be affordable, we do not use the term affordable to describe any specific type or tenure of housing.”

The above statements are contradictory: is the Policy requirement 35% affordable homes, as stated in P4, or 100% affordable homes as stated in Policy P1: “All homes in Southwark should be affordable”?

“35% affordable housing” from proposed Policy P4 means, by definition, 65% unaffordable housing. 65% unaffordable housing can’t, by definition, comply with the claim that

“All homes in Southwark should be affordable.”

The two are necessarily incompatible.

The proposed Policy ‘P4 private rented homes’ is therefore not properly prepared, it is not justified, and it is not effective.

For the people of Southwark, 100% affordable housing would be by far the better option.

Building unaffordable housing is, by definition, a very bad idea. Southwark Council Planners are paid to present Policies and proposals that are positively prepared, that are justified, and that are effective.

I am not paid to present Policies and proposals that are positively prepared, that are justified, and that are effective.

But an outline of how ‘Policy P4 private rented homes’ could be made Sound would be for

1. Current Southwark Planners should resign, so that competent people who are capable of doing the job can take their place: Planners who know and understand the meaning of ‘affordable’; Planners who know the difference between urban planning and urban vandalism; Planners who are capable of writing honest, truthful, and complete reports for Planning Committees and

The note on affordable housing has been amended and moved into the reasons section of P1, the term affordable is not specific enough which is why we use the descriptive terms i.e social rent and intermediate housing. This is not intended to mean that all housing is affordable.

Aylesbury Area Action Plan sets out the affordable housing requirements for new homes within the Action Area, this is reflected in the New Southwark Plan.

Where viable, on council owned land a greater provision of 50% affordable housing will be provided. This commitment is set out on page 12 (A Fairer Future - a place to belong) of the Council Plan. We will continue our long-term homebuilding programme, delivering on our commitment to build 11,000 new council homes by 2043.

Within the Council Plan on page 12 (A Fairer Future - a place to belong) there is also a commitment to guarantee developments on council housing land have at least 50% council rented homes and ensure a right to return for council tenants and resident leaseholders so local people can stay in the borough they call home.

<p>not Reports clouded with deceit; and Planners who know the difference between urban planning and greed.</p> <p>2. Planners to avoid writing deceitful reports such as the 111 page Officer's Report on the Aylesbury so-called regeneration which never once mentions the permanent loss of 778 homes for social rent that the scheme is based on. The figure is illustrated in a Table of figures, but it is never pointed out or explained in the text to people such as Councillors on the Planning Committee who are not trained to read Table of figures, so that they can appreciate that the Aylesbury regeneration proposals represent one of the greatest losses of social housing – homes for social rent – in the history of the United Kingdom.</p> <p>3. Planners to learn what 'affordable' means, and to learn that stating that "Affordable housing requirement option on qualifying private rented homes scheme. Affordable housing: a minimum of 35%" while at the same time stating that "All homes in Southwark should be affordable" highlights the current Planners incompetence.</p> <p>The honourable thing for the Planners to do would be to resign.</p>	
<p>Individual NSPPSV384</p> <p>same as before</p>	<p>Noted.</p>
<p>Organisation: Watkin Jones Group NSPPSV389</p> <p>In general, the Group agrees with the initial thrust of the policy contained within points 1.1 to 1.5. However, the Group has significant concerns relating to point 1.6 of the proposed policy which immediately demonstrates a lack of consistency between the proposed Southwark policy and the GLA policy. Firstly, point 1.6 states that on sites of 100 or more dwellings, private rented home should "Be secured for the rental market for a minimum 30-year term". The Group strongly objects to this term and considers that it is far too long a term for the current market situation. Emerging build to rent policy is contained within Policy H13 of the forthcoming New</p>	<p>The 30 year term is considered necessary to provide more security for tenants in the private rented sector than the 15 years set out in the Draft London Plan.</p> <p>The draft London Plan allows the affordable housing offer to be solely discount market rent. It also states that boroughs can require a proportion of affordable housing as low cost rent (social rent or London Affordable Rent) as per Policy H7A. Given the acute need of social rent housing in the borough, Policy P4 seeks the provision 15% social rent equivalent in private rented</p>

London Plan. The policy confirms that to qualify as a build to rent a set of criteria must be met, this includes criterion 2 which states that “the homes are held as Build to Rent under a covenant for at least 15 years”. The text is followed by footnote 54 which adds that “Covenant periods are expected to increase as the market matures”.

The build to rent market is currently a growing sector, it has not yet settled down and matured and therefore it has no established secondary market. The inclusion of a 30-year term is far in excess of anything that ourselves and other developers have encountered elsewhere within London. The usual term length for such agreements has traditionally been 15 years. It is noted that the emerging London Plan does confirm that covenant periods may increase as the market matures but we consider that at this point that the market is not mature enough to be restricted by covenants lasting 30 years.

We also would like to object on point 1.7 and point 2 of Policy P4 and the associated Table 3 with regards to the proposed affordable housing requirements for build to rent developments. We would question the pricing point of the affordable units as we consider that the Council should allow for other pricing points for the affordable units. The Council is seeking two products which are set well below the 80% market rent as suggested by the NPPG.

In dealing in these matters with the GLA, it is our experience that they seek a quantum of affordable units and like this quantum to be divided across a variety of pricing points (i.e. some at the 80% and some lower). This was the case with our BTR scheme at Sutton Court Road in Sutton. The GLA are more concerned about obtaining a suitable quantum of affordable units, rather than their pricing points. (i.e. they are happy to have some at higher affordable rents if this enabled the quantum of affordable housing they required

Organisation: Alvey estate tenants and leaseholders association (ATLAS) (& liaison with some of neighbouring Kinglake Tra)
NSPPSV396

scheme instead of all Discount Market Rent as suggested in the Draft London Plan.

Noted.

No further comment applied	
Individual NSPPSV397	
No further comment applied	Noted.
<p>Organisation: Leathermarket Joint Management Board (JMB) & Leathermarket Community Benefit Society (CBS) NSPPSV398</p> <p>The slight increase in the threshold for social rented housing, from 12% to 15%, does not make the policy sound. P4 remains internally inconsistent with P1, and it is unclear why the policy on social rent homes should be applied differently in the case of large, private-rental schemes. The requirement that applies only to schemes providing over 100 homes has not been changed, and remains inconsistent with P1. As current legislation favours landlords, private rental housing will not adequately meet the housing needs of many Southwark residents. Private rented housing schemes should provide the same amount of social rented housing as required under P1. P1 should be applied to all housing schemes, regardless of the type of tenure.</p>	<p>The draft London Plan allows the affordable housing offer to be solely discount market rent. It also states that boroughs can require a proportion of affordable housing as low cost rent (social rent or London Affordable Rent) as per Policy H7A. Given the acute need of social rent housing in the borough, Policy P4 seeks the provision 15% social rent equivalent in private rented scheme instead of all Discount Market Rent as suggested in the Draft London Plan.</p>
<p>Individual NSPPSV406</p> <p>We note Emerging Policy P4 (Private rented homes) sets out a range of criteria if more than 100 new homes in developments are self-contained, private rented homes. The criteria could have the effect of unnecessarily constraining development and would therefore not be effective in its delivery. To ensure there is flexibility, we would request that the following underlined text is added to Emerging Policy P4: A flexible approach to private rented homes should be taken when considering comprehensive redevelopment proposals. Making this change would provide flexibility and it will ensure that the NSP is effective in its delivery.</p>	<p>Amended Policy P4 which relates to private rented schemes of 100 units of more takes a more flexible approach to Policy P1 relating to build for sale homes.</p>

<p>Organisation: Friends of Surrey Square Park NSPPSV407</p> <p>Private rented homes should be comprehensively monitored for compliance to the standards and quality of living they provide. The policy should not be used as an excuse for decreasing the number of social low rent homes available in the borough.</p>	<p>Policy P4 requires private rented schemes to provide the same design standards required for build-for-sale homes.</p> <p>All homes are required to comply with the design policies in the Plan and the Residential Design Standards.</p>
<p>Organisation: University of Sheffield NSPPSV410</p> <p>No further comment applied</p>	<p>Noted.</p>
<p>Organisation: Balfour Housing Street Project NSPPSV173</p> <p>This submission is made on behalf of members of the Balfour Street Housing Project, a fully mutual co-op of 21 households located directly opposite Trafalgar Place, the first development site undertaken by Lend Lease on the former Heygate Estate site, 5 minutes' walk from the Aylesbury Estate site and the boundary for the Old Kent Road Opportunity Area runs along our street. We are tenants who prevented the demolition of the houses we occupy over 40 years ago and worked with the then Council members and officers to bring them into use. Throughout the life of this Co-op we have played an active role in neighbourhood activities, initiating the development of what is now the Green Flagged Victory Park and Nursery Row Parks and are currently working with officers and members on the Balfour Street improvement scheme. Given the enormous loss of Council housing and the undermining of a sense of community in large parts of this neighbourhood in this neighbourhood we feel the New Southwark Plan (NSP) should do everything possible to redress this.</p> <p>The proportions for build to rent should be the same as for Policy P1: i.e. 25% of total should be social rent.</p>	<p>The draft London Plan allows the affordable housing offer to be solely discount market rent. It also states that boroughs can require a proportion of affordable housing as low cost rent (social rent or London Affordable Rent) as per Policy H7A. Given the acute need of social rent housing in the borough, Policy P4 seeks the provision 15% social rent equivalent in private rented scheme instead of all Discount Market Rent as suggested in the Draft London Plan.</p> <p>Private rented schemes are likely to be managed by one operator, therefore social rent equivalent and affordable rent capped at London Living Rent equivalent is expected to be provided.</p>

Furthermore, reference to social rent 'equivalent' should simply say actual social rent – with length of tenure. These tenants should have the same security of tenure as any others in the borough.

Individual
NSPPSV136

P4 PRIVATE RENTED HOMES

Please give details of why you consider the New Southwark Plan to be unsound for this policy amendment.

The policy is not positively prepared because it is inconsistent that P1 refers to social rent and P4 to social rent equivalent. No change has been made to the requirement that the provision of affordable housing only applies to schemes of more than 100 homes, which is inconsistent with P1 where the threshold has been removed.

Please set out what change(s) you consider necessary to make the New Southwark Plan legally compliant or sound.

Private rented housing schemes should provide the same amount of social rented housing as required under policy P1. The policy should apply to all private rented housing schemes.

The draft London Plan allows the affordable housing offer to be solely discount market rent. It also states that boroughs can require a proportion of affordable housing as low cost rent (social rent or London Affordable Rent) as per Policy H7A. Given the acute need of social rent housing in the borough, Policy P4 seeks the provision 15% social rent equivalent in private rented scheme instead of all Discount Market Rent as suggested in the Draft London Plan.