

Representation	Officer Response
<p data-bbox="188 316 434 344">SP3 Best Start in life</p> <p data-bbox="188 357 353 421">Individual NSPPSV148.4</p> <p data-bbox="188 466 1075 529">The Plan does not have a vision and its Strategic Policies are disconnected from the Development Management Policies.</p> <p data-bbox="188 571 1093 855">Several of the Strategic Policies have no or very minimal policies to give expression to their ideals and ambitions. SP2 Social Regeneration was introduced into the Plan at the last moment. It aims to provide the best outcomes for existing residents and to support empowered local communities but in terms of the deliverability of this policy no planning mechanisms are proposed. The DM policies cover design and conservation issues only; there is no community spaces policy, no policy on estate regeneration etc.</p> <p data-bbox="188 896 1070 960">SP3 Best Start in Life mentions childcare, playspace, library access but the DM policies only cover education places and student homes.</p>	<p data-bbox="1140 466 2067 708">Strategic policies set out the overall strategy for delivering the council's key aims and commitments, whilst the development management policies set out further detail on how the strategic policies will be achieved. Estate regeneration is addressed in SP2 'Regeneration that works for all' aiming to revitalise our places and neighbourhoods, promoting wellbeing and aiming to reduce inequalities to achieve stronger communities with a better quality of life.</p> <p data-bbox="1140 750 2067 922">Community spaces including nurseries, day centres, libraries access etc. are covered in P44 Community uses. Provision of playspace and amenity space in development is covered within Policy P11: design of places and within residential development it is covered in Policy P9: optimising delivery of new homes in the Amended Policies.</p>
<p data-bbox="188 1008 595 1072">Organisation: Southwark Cyclists NSPPSV164.3</p> <p data-bbox="188 1114 394 1177">SP3: Best start in Life</p> <p data-bbox="188 1187 362 1251">Not positively Prepared</p> <p data-bbox="188 1260 1115 1433">The NSP is not positively prepared in that it fails to recognise the critical need to increase opportunity for Southwark's children to be able to travel independently and to integrate physical activity into their daily lives through playing, walking and cycling, in order to reduce health inequalities. Paragraph 35 of the NPPF promotes the designation of Home Zones to reduce conflict,</p>	<p data-bbox="1140 1114 2067 1398">Strategic Policy 6 – Cleaner, Greener, Safer aims to make walking, cycling and public transport a convenient, safe and attractive means of travel for all residents, including children. Furthermore, development management policies in Healthy, active lives chapter of the New Southwark Plan seek to ensure that the vision and objectives set out in SP6 are achieved, these include ensuring safe and efficient operation of the local road networks and ensuring routes and access are safe and designed to be inclusive to meet the needs of all pedestrians.</p>

for example. To make this policy sound an extra point could be added: ' 8 Reducing road danger to make more of our streets safe for children to use unaccompanied from the age of 8. '

Individual
NSPPSV218.11

The existing manner of Representation through Consultations is impossible to track, trace and quantify. This is a problem for the entire NSP and the history of planning decisions across the board, throughout the nation over time. Consultations are wordy questions or just requests for input from concerned citizens and interest groups. Consultations are left in public places (often they are not where they are meant to be but there is no tracking of that omission; like the NSP itself was said to be at my local library from the 18th of January but never arrived nor was it known to librarians). Representation should be a statistical questionnaire. The questions, the construction, sampling, graphs, statistical responses can be analyzed independently with clarity of documented user group response. It is perfectly clear why a statistically accountable collection of opinion is not the preferred route of council planners and politicians who would prefer to err on content delivery rather than be hindered by time spent getting it right.

The NSP entirely rests its case for The Best Start in Life on (pages 52-3) Education Places Student Homes
What is missing on first reading from the NSP Best Start in Life is Affordability. Southwark currently has 30% of the need for 2-year-old free early years nursery places unmet. The reality of children's wellbeing to ensure a healthy happy and productive future benefiting themselves their families and ultimately the wider social framework ranges from health infrastructure of all sorts, sports and free time activities covering the widest range of possibility available throughout the year. A life spent navigating unsafe (streets with no separation of space for cyclists, pedestrians and drivers) polluted streets without easy access to deep green is not a best start

Noted. The policy has been amended and point 8 was added, to encourage developments where interaction between elderly and young people can be facilitated.

nor best at any point of life through to the natural infirmities of the last years of the healthiest happiest life which need identical safe clean and green infrastructure including outdoor benches and tables to sit and play games and talk to friends and neighbours. Schools and care facilities must be linked to woods and nature where gardens can be tended and lessons taught. The coinciding needs of the old and young are documented. There should be physical joint development of nurseries and care homes. Joint development could extend to primaries and other educational institutions. Integration of all age groups, safe streets and nature and also animals: dogs, cats, chickens, bees provides a cost effective delivery of a wide range services.

Representation	Officer Response
<p data-bbox="188 316 448 344">P23 Education places</p> <p data-bbox="188 357 806 421">Organisation: Education and Skills Funding Agency NSPPSV55.3</p> <p data-bbox="188 466 1111 708">5. The ESFA broadly supports Policy P23 Education places. However, clause 3 would benefit from clarification to make it clear that developers will only be expected to fund the school places required to meet the need generated by their development (to comply with the legal tests for planning obligations). This could be re-worded as follows: “3 Where additional school places <u>are required to meet the need generated by a new development, the development must provide these by providing new school places.</u>”</p> <p data-bbox="188 718 1111 1027">6. The supporting text could then explain how these additional school places could be provided via on-site provision of land and funding of the construction of the school(s), or financial contributions to the delivery of new or expanded schools off-site. The Regulation 123 List indicates that financial contributions to school provision and expansion would generally be secured via the community infrastructure levy (CIL), but land for schools could be secured via section 106. Clear signposting of these mechanisms within the supporting text to Policy P23 would also improve clarity for developers and other stakeholders.</p> <p data-bbox="188 1037 1111 1321">7. The ESFA emphasises the need to ensure that education contributions made by developers are sufficient to cover the increase in demand for school places that are likely to be generated by major developments. Given the multiple demands that will be placed on CIL funds, there is clearly a degree of uncertainty about the extent to which CIL contributions will be sufficient to cover the demand for school places. It would be helpful if the council could clarify its priorities for CIL funding or give an indication of how CIL funding will be apportioned between different infrastructure types.</p>	<p data-bbox="1140 466 1733 494">Policy wording under point 3 has been amended.</p> <p data-bbox="1140 536 2063 852">In the Implementation Policies chapter of the NSP, IP2 details what S106 legal agreements, Southwark Community Infrastructure Levy (CIL) and Mayoral CIL are and what they are used for. Furthermore, we have a Section 106 and CIL SPD (2015) within an Addendum (2017) that set out the council’s approach to both Section 106 legal agreements and the Community Infrastructure Levy (CIL). Both of these are tools to secure investment in the borough and around development sites which is designed to offset any impact that a development will have. It is not necessary to repeat this information within the New Southwark Plan.</p>
<p data-bbox="188 1369 340 1433">Individual NSPPSV68.1</p>	

The policy Best Start in Life P23 Education Places in the New Southwark Plan is unsound because it has not been positively prepared with regard to education place provision required for families, in line with other policies around sufficient provision for housing families in the borough.

Clear minimum requirements for building family homes are not reflected with equally clear minimum requirement for provision of education places. Additionally, "education places" are not adequately defined to ensure that they are understood to cover the needs of all children, from nursery through to high school and further education. Throughout the plan, education places are commonly referred to as "School Places", which infers children at "school age" (5+) therefore excluding under 5s and not addressing needs for early education.

In policy P2 New Family Homes. There are clear minimum thresholds for housing families in Southwark within the New Southwark Plan.

Major residential developments, including conversions, must provide the following housing mix:

- 1.1 A minimum of 60% with two or more bedrooms; and
 - 1.2 A maximum of 5% studios, which can only be for private housing; and
 - 1.3 The maximum number of bed spaces for the number of bedrooms where they are social rented; and
 - 1.4 A minimum of homes with three or more bedrooms as set out in Table 2 and Figure 1; and
 - 1.5 Family homes in apartment blocks should be on lower floors to improve access to outdoor amenity space and allow oversight of children outside.
- (Page 26)

The reasons given for the need to build new family homes are fair and reasonable:

Building more family housing will help to address overcrowding, provide opportunities for families to live in all of our neighbourhoods, benefitting

Policy P2 sets out the minimum proportion of larger units that should be provided in different parts of the borough. The New Southwark Plan is intended to be read as a whole, Policy P23 sets out the requirement for new developments to provide new school places where needed. The policy refers to pre-school, school, higher and further education.

The Council is responsible for ensuring there are sufficient primary and secondary school places are available. As such, this needs to be considered and planned for when considering planning applications. Where a new development will increase the need of school places, this will be identified by the council and the relevant measures will be put in place for these spaces to be provided through CIL. An annual review of primary and secondary school places need is undertaken by the Council to monitor this.

their health and wellbeing, and increase opportunities for foster care. Our Strategic Housing Market Assessment (SHMA) shows that we need 96% of new social rented homes and 36% of new intermediate tenure homes to provide three or more bedrooms. We require a minimum proportion of new homes to provide two beds or more because studios and one bed homes are unsuitable for families.

(Page 26)

There are also clear targets on providing affordable housing within the borough, as it is recognised that there is a shortage of affordable homes in the borough:

There is a shortage of affordable homes in Southwark and across London. Providing new affordable homes suitable for a range of affordable housing need is our main priority. This includes social rent and intermediate tenure homes. Our evidence shows that Southwark has a net additional housing requirement for 1,472 to 1,824 homes per year (2013-2031). Due to the high cost of market housing our annual net affordable housing need is for 799 homes per year² (this accounts for approximately 48% of Southwark's total annual housing need). Low cost home ownership homes must be affordable to Southwark residents.

(Page 22)

The New Southwark Plan also recognises that the lack of affordable housing is causing issues with over-crowding, which has a negative effect on children and families:

Overcrowding is strongly related to poor physical and mental health and can strain family relationships. Children in overcrowded homes often achieve poorly at school and suffer disturbed sleep. Social rented housing is vital to social regeneration as it allows residents with who cannot afford suitable market housing to remain close to their families, friends and employment.

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While the policies on housing provide clear minimum thresholds for family provision, there is no clarity on minimum thresholds for education places (particularly pre-school, primary and secondary school), which will be an obvious resource necessity for families living in the borough

Best Start in Life P23. Education Places does make clear that development should not reduce the number of education places and does make mention of the need for provision of new school places:

Development should not lead to the loss of existing educational facilities unless there is re-provision in an area of identified need or they are surplus to requirements as demonstrated by pupil or student projections.

[...]

Where additional school places for new residents are needed, development must provide these by providing new school places.

(Page 52)

However, this wording is vague and it does not clarify the requirement to provide educational places in-line with the policy on providing family homes (which by default means that there will be children).

Additionally, there is lack of clarity as to how “Education Spaces” are defined. There is reference to pre-school (Early Years education) at the beginning of the policy, but it seems to be defined as separate from “school”, as this is listed separately:

Development of educational facilities will be permitted where proposals provide pre-school, school, higher and further education places to meet identified needs and where there are sports, arts, leisure, cultural or community facilities that are shared with local residents.

(Page 52)

For the remainder of the policy and throughout area vision “school places” are referred to, however this implies that the requirement would be for school places (over 5s) and does not include Early Years education.

It is important to include Early Years education spaces when talking about “Best Start in Life”. There are a number of studies that show the importance of early education in children’s development.

- Early Education Use and Child Outcomes up to Age 3 (2017) Published by the Department for Education

<https://www.gov.uk/government/publications/early-education-use-and-child-outcomes-up-to-age-3>

- Pre-school and early home learning: effects on A level outcomes (2015) Published by the Department for Education

<https://www.gov.uk/government/publications/pre-school-and-early-home-learning-effects-on-a-level-outcomes>

- The Effective Provision of Pre-school Education (2002). Authors: Kathy Sylva, University of Oxford; Edward Melhuish, University of Wollongong; Pam Sammons, University of Nottingham; Iram Siraj-Blatchford, University of Wollongong; and Brenda Taggart, University of London.

<http://ro.uow.edu.au/cgi/viewcontent.cgi?article=3155&context=sspapers>

If the New Southwark plan is making clear that there is a requirement for new development to include 60% family homes (2+ bedrooms), it would be sound to include a minimum requirement in-line with this for education places.

Additionally, the wording of such requirement should make clear that “education places” includes space for children at all levels of education: nursery through to high-school and further education. All instances in the plan that read “school places” should be amended to “education places” and there should be a clear definition within the P23 Education Places policy that explains education places to include pre-school/nursery, primary school and secondary school places.

Without clarity in the policy there is a risk that housing developments will be approved without adequate education facilities for the families who live

there. Clear wording for this should be included in both P2 New Family Homes and P23 Education Places, as it is important that there is a clear link between both policies.

Suggested re-written versions of the policies are as follows, with changes and additions highlighted in yellow.

P2: New family homes

Major residential developments, including conversions, must provide the following housing mix:

1.1 A minimum of 60% with two or more bedrooms; and

1.2 A maximum of 5% studios, which can only be for private housing; and

1.3 The maximum number of bed spaces for the number of bedrooms where they are social rented; and

1.4 A minimum of homes with three or more bedrooms as set out in Table 2 and Figure 1; and

1.5 Family homes in apartment blocks should be on lower floors to improve access to outdoor amenity space and allow oversight of children outside

1.6 A minimum provision of adequate facilities for families who will be resident in the development, particularly including education places (pre-school, primary school and secondary school). If facilities do not already exist they must be provided in partnership with the development.

P23: Education places

1 Education places are defined as including education at all age levels, from birth through to adulthood. This includes pre-school, primary school, secondary school and further education.

2 Development of educational facilities will be permitted where proposals provide pre-school, school, higher and further education places to meet identified needs and where there are sports, arts, leisure, cultural or community facilities that are shared with local residents.

3 Development should not lead to the loss of existing educational facilities unless there is re-provision in an area of identified need or they are surplus to requirements as demonstrated by pupil or student projections.

4 In line with P2. New Family Homes (page 27), where there is a requirement that all major residential developments provide a minimum 60% of houses with two or more bedrooms, sufficient provision must be provided for education places for new residents, if sufficient provision does not already exist, development must provide new education places alongside housing.

5 Development of school places must provide sufficient floor space for teaching, halls, dining, physical education, staff and administration activities, storage, toilets and personal care, kitchen facilities, circulation, plant and any non-school or support functions such as special needs facilities. Schools must receive adequate daylight and sunlight, provide high quality external areas that avoid sightlines from neighbouring homes, have good internal and external air quality and support safe travel by pupils.

Organisation: Greenpruce GP
NSPPSV72.8

This draft policy stipulates that "where additional school places for new residents are needed, development must provide these by providing new school places." Whilst the provision of sufficient school places across the London Borough of Southwark is, of course, a necessity, it is proposed that the wording of this policy should more explicitly refer to the London Borough of Southwark's anticipated pipeline of school developments and extensions based on projected housing delivery, with the requirement to provide new school places only for those unanticipated developments which go beyond the projected housing supply.

Point 3 of P23 requires additional school places to be provided subject to need. This refers to both anticipated and unanticipated development.

The Council is responsible for ensuring there are sufficient primary and secondary school places available. As such, this needs to be considered and planned for when considering planning applications. Where a new development will increase the need of school places, this will be identified by the council and the relevant measures will be put in place for these spaces to be provided through CIL. An annual review of primary and secondary school places need is undertaken by the Council to monitor this.

Organisation: London School of Economics and Political Science (LSE)
NSPPSV113.4

Policy P23 Education Places

Support for P23 has been noted and acknowledged.

<p>There is strong support for the Borough’s objectives of delivering new educational facilities for higher education institutions.</p>	
<p>Organisation: Southwark Cyclists NSPPSV164.8</p> <p>P23: Education Places Not consistent Not positively Prepared The need to encourage physically active travel to school is recognised across national and Londonwide policy. Simply encouraging safe travel, as this policy does, can lead to schools hindering healthy travel choices, such as by prioritising cars over cycling. To make this policy sound suggest rewording it to: ‘and support safe , healthy travel by pupils.’</p>	<p>Policy wording under point 4 has been amended to encourage safe and healthy travel by pupils.</p>
<p>Organisation: Sport England NSPPSV170.1</p> <p>Sport England understands the Council’s need to support school applications. However, in some instances, school extensions may be contrary to the Council’s open space policies, for example, development on playing field land. Sport England recommends the following alterations to the plan to make the plan sound;</p> <p><i>‘Development of educational facilities will be permitted where proposals provide pre-school, school, higher and further education places to meet identified needs, and where there are sports, arts, leisure, cultural or community facilities that are shared with local residents. <u>And proposals do not conflict with other plan proposals.</u>’</i></p>	<p>Any school application coming forward will be considered on its own merits and against the Council’s development plan.</p>

Individual
NSPPSV237.2

There is no recognition of the placemaking effect and needs of educational places in a neighbourhood context, including the way they interact with and/or benefit from the presence of nearby non-residential uses. This includes the collective ability of all non-residential uses to attract custom, which includes schools funding themselves by renting their facilities outside hours.

To make the policy sound, a new paragraph P23 (5) should be added:
“We will proactively use zoning powers to designate areas characterised by educational uses, particularly where there are other nearby commercial uses which act to provide services, employment and community interaction. This will include an expansive use of the ‘local centre’ designation to provide a framework for good local planning and visioning.”

Policy wording has been amended, and point 5 was added to ensure that provision is made to enable the facilities to be used by all members of the community.

Representation	Officer Response
<p>P24 Student homes</p>	
<p>Organisation: Alumno Developments NSPPSV09.3</p> <p>Alumno Developments submitted representations on the 13th September 2017 that sought to amend Policy DM22 (renamed to Policy P24) of the Preferred Options consultation document.</p> <p>The representations raised concerns regarding the requirement for student accommodation to provide affordable housing, stating it is unduly onerous and is flawed in terms of viability and having to be located within Regeneration Areas. This is discussed in more detail below.</p> <p>Policy P24 – Student Homes of the Proposed Submission Version of the New Southwark Plan has amended Policy DM22 and now states: Development of purpose-built student housing must:</p> <ol style="list-style-type: none"> 1 Provide adequately sized bedrooms and functional indoor communal living space commensurate with the intended number of occupiers sharing the communal space; and 2 Provide 10% of student rooms as easily adaptable for occupation by wheelchair users; and 3 When providing direct lets at market rent, provide 35% of the Gross Internal Area of the floorspace as conventional affordable housing, as per policy P4, as a first priority. In addition to this, 27% of student rooms must be let at a rent that is affordable to students; or 4 When providing affordable student rooms for nominated further and higher education institutions, provide as much conventional affordable housing as viable, as per policy P4. <p>Alumno Developments support the removal of any specified location for student accommodation, and believe this is a positive amendment. However,</p>	<p>We note Alumno’s support of the removal of any specified locational requirement.</p> <p>The role of student housing schemes in reducing pressure on lower income households housing needs is recognised through the provision of affordable housing through such schemes.</p> <p>It is also important to reduce the risks of an over supply of PBSA at the expense of other forms of accommodation, particularly affordable and family housing for which there is an acute need in the borough as recognised in the Strategic Housing Market Assessment 2019.</p> <p>Viability testing undertaken by BNP Paribas in July 2019 confirms that schemes tested can viably deliver both conventional and affordable housing with up to 27% GLA affordable student accommodation. BNP Paribas concludes that where the viability is demonstrated as challenging by the applicant, the Council’s approach of applying their affordable housing and student accommodation policies flexibly, i.e. subject to viability, will ensure that schemes will still be able to come forward whilst delivering the maximum quantum of conventional affordable housing and student accommodation.</p> <p>‘Affordable student rent’ should be provided as per the requirements of the Draft London Plan - TBC. The definition as set out in the Draft London Plan states is “a PBSA bedroom that is provided at a rental cost for the academic year equal to or below 55 per cent of the maximum income that a new full-time student studying in London and living away from home could receive from the Government’s maintenance loan for living costs for that academic</p>

the concerns regarding the need for conventional affordable housing remain.

The representations previously submitted are reiterated and should be considered once more. As it currently stands, the accompanying text to draft Policy P24 gives some indication as to reasoning behind the general aims of the policy, where Southwark Council are concerned that 'allowing too much student accommodation will restrict ability to deliver more family and affordable housing' (which is one of the aims of Policy 3.8 of the London Plan on housing need). This approach does not fully appreciate the role that designated student housing plays in unlocking the private-rented housing market. Purpose-built student accommodation provides students with specialist accommodation who would otherwise look to live in private-rented accommodation, making much needed accommodation unavailable to those who it is more suitable for, such as families. As such, the provision of student accommodation does not only provide continued investment into the Borough, but frees up housing stock for those who most need it.

It is indeed confirmed in the South East London SHMA (2014) that only 7% of students in South East London live in purpose built student accommodation with 23% still living with their parents and close to 50% living in the private rented sector. The SHMA goes to say that there is a concern that the increasing student demand will in fact put pressure on the PRS which will in turn squeeze out lower income non-students. On this basis it was concluded that there is certainly a demand for purpose built student accommodation however this should not be to the detriment of affordable housing. This would not be the case as the adopted policy already requires developments comprising student accommodation to provide a 35% of affordable conventional housing.

The policy and its supporting text currently do not provide viability evidence to justify the need for the 27% element to be made available as affordable to students over and above the existing adopted policy position of 35% affordable housing provision.

year. The actual amount the Mayor defines as affordable student accommodation for the coming academic year is published in the Mayor's Annual Monitoring Report." This is to be added to the glossary of the New Southwark Plan.

The adequate sized rooms and functional indoor communal living space will be considered on a case by case basis on whether the proposed amounts are sufficient for the type of development.

Student wheelchair users should be offered a range of options in their choice of PBSA, thus it is important there is a reasonable provision of this form of accommodation in PBSA schemes.

Furthermore, it should be noted that this approach differs to that of the recently published Draft London Plan (2017) that states that London Borough's should seek to secure purpose-built student accommodation where at least 35% of the accommodation is secured as affordable student accommodation. Southwark's approach is more onerous as it requests conventional affordable housing in addition to affordable student accommodation. The London Plan goes on to define affordable student accommodation as: "a PBSA bedroom that is provided at a rental cost for the academic year equal to or below 55 per cent of the maximum income that a new full-time student studying in London and living away from home could receive from the Government's maintenance loan for living costs that academic year".

It is therefore unclear as to how Southwark Council have reached their proposed position. Further viability evidence is sought to fully understand the Council's rationale for adding a further element of affordable housing which would allow independent corroboration and viability testing.

In addition, further clarity is requested on the meaning of 'affordable rent' for students within purpose-built student accommodation schemes, have the Council taken the same approach as defined in the London Plan as set out above? This would help to better understand how the policy will be practically applied in a consistent and equitable manner. It is also requested that it be made clear as to how affordable rent will be calculated on an ongoing basis, along with the frequency with which this will be reviewed and the process in place for rent reviews to subsequently be agreed upon.

With additional evidence on what affordable rent is, the plan would prove to be more robust and effective. This should be set out in the supporting text of the document providing guidance on what an affordable level of rent is in the Borough.

Alumno Developments would suggest that Point 3 of the policy is amended to be less prescriptive in its wording and remove the requirement to provide a further 27% of any student accommodation scheme to be allocated for affordable rent as this would help to ensure that student accommodation schemes are viable and deliverable within the Borough.

Returning to point 1 of Policy P24, it is considered that further information is required on what the Council considers as being “Provide adequately sized bedrooms and functional indoor communal living space”. In its current form this section of the policy is very subjective and detail should be provided on what an adequate sized bedroom and functional indoor communal living space is. This would help to better understand how this part of the policy is to be practically applied and ensure it is not applied subjectively and / or overly prescriptively.

Point 2 of the draft policy requires 10% of student rooms to be easily adaptable to be used by wheelchair users. The majority of students that are wheelchair users live in student accommodation located on university campuses. On this basis, it is considered that this is overly onerous as it is unlikely that wheelchair users will choose to live on student accommodation outside of a university’s campus. As such we would like to suggest that the wording of the policy is reconsidered to read:

Up to 10% of student rooms are easily adaptable for occupation by wheelchair users.

This would allow student accommodation provider’s additional flexibility in the design of their schemes.

Organisation: Greystar Europe Holdings
NSPPSV73.2

Greystar generally supports this policy and the aspiration to provide quality

Viability testing undertaken by BNP Paribas in July 2019 confirms that

student accommodation. However, we have serious concerns in relation to the requirement of 35% affordable housing and 27% discount student rent. This equates to 62% of proposed GIA being either affordable housing or discounted student rents. The remaining 38% of units available to the student market would have to be of such a high value that there could be no possibility of any PBSA schemes coming forwards and satisfying both elements of the policy. This draws the question on why the policy is drafted in such a way.

Greystar consider generally that Part 2 of the policy will significantly constrain future opportunities for PBSA and for the affordability of the market units within PBSA consents. There is relatively little PBSA in London, particularly of a good quality, though noting Southwark is doing better than average, therefore much of the student accommodation is substandard conversions of existing stock, often at the expense of family dwellings. By limiting PBSA development this issue will not be alleviated and could in fact increase the problem. Where the pipeline of units is constrained and the units coming forward are artificially costly, the result will be to increase pressure on the wider London housing market and decrease the affordability of the market student units.

We are also unclear as to the definition of affordable student rent. The draft London Plan links this level to government policy on grants. PBSA developments are undertaken in a market context with all the associated costs of development. Any discounted rate should be considered against the market, not against government policy on grants (which could change). Linked to this, access to such affordable units might be through a list held by a higher education institute (nominated route) but there does not appear to be any consideration of how these units are allocated where a nominations agreement is not in place.

schemes tested can viably deliver both conventional and affordable housing with up to 27% GLA affordable student accommodation. BNP Paribas concludes that where the viability is demonstrated as challenging by the applicant, the Council's approach of applying their affordable housing and student accommodation policies flexibly, i.e. subject to viability, will ensure that schemes will still be able to come forward whilst delivering the maximum quantum of conventional affordable housing and student accommodation.

P24 recognises the role in good quality student accommodation in relieving pressure on wider housing needs through contributions to affordable housing through PBSA schemes.

'Affordable student rent' should be provided as per the requirements of the Draft London Plan - TBC. The definition as set out in the Draft London Plan states is "a PBSA bedroom that is provided at a rental cost for the academic year equal to or below 55 per cent of the maximum income that a new full-time student studying in London and living away from home could receive from the Government's maintenance loan for living costs for that academic year. The actual amount the Mayor defines as affordable student accommodation for the coming academic year is published in the Mayor's Annual Monitoring Report." This is to be added to the glossary of the New Southwark Plan.

In terms of nominations of students, this will be considered further.

Organisation: Home Builders Federation (HBF)
NSPPSV84.7

The policy is unsound because it is ineffective in terms of equating the supply of student homes as being equivalent to meeting conventional housing needs.

The current London Plan assesses the need for student housing (SHMA 2013) but it does not do so as part of its demographic modelling. The HBF is not convinced that the provision of student units will contribute to meeting conventional housing needs, or releasing conventional homes, if the GLA has not properly assessed the future growth ambitions of higher education institutions and colleges across London. There is a danger that overall housing needs have been under-estimated as a consequence. Page 53 of the Southwark Local Plan refers to this tension.

We consider that the Southwark Local Plan should reflect the new London Plan policy H3 whereby three bedrooms of student housing in non-self contained schemes should equate to one unit of C3 conventional housing.

This comment is noted and we will adopt the 2.5 to one ratio of PBSA bedrooms to one unit of conventional C3 housing as set out in the Draft London Plan (July 2019) within our housing monitoring figures.

Organisation: Indigo Planning
NSPPSV88.1

Purpose of representations

These representations have been submitted in order to put forward our view of the emerging policies within the New Southwark Plan, specifically Policy P24: Student homes. Other comments relating to the Old Kent Road policies are also included.

We believe that the New Southwark Plan (“the plan”) fails the test of soundness as set out in paragraph 182 of the NPPF on the basis that the plan is not justified. It is not based on a realistic evidence base for the delivery of student accommodation schemes in London; specifically BNP Paribas’ assumptions set out in New Southwark Plan Evidence base: Housing Policy Viability Study (September 2015) lacks transparency and key detail.

Viability testing undertaken by BNP Paribas in July 2019 confirms that schemes tested can viably deliver both conventional and affordable housing with up to 27% GLA affordable student accommodation. BNP Paribas concludes that where the viability is demonstrated as challenging by the applicant, the Council’s approach of applying their affordable housing and student accommodation policies flexibly, i.e. subject to viability, will ensure that schemes will still be able to come forward whilst delivering the maximum quantum of conventional affordable housing and student accommodation.

In its current form, the plan cannot be found sound and the evidence base relating to the requirement for affordable housing and affordable student accommodation should be subject to further review.

Policy P:24 Student homes

A specific policy relating to student homes is welcomed, however the requirement for 35% of the GIA to be provided as conventional affordable housing as well as the requirement for 27% of student rooms to be let at a rent that is affordable to students (a requirement effectively relating to 62% of the GIA of student schemes) fails to consider the delivery model as well as the operational efficiencies and the on-going management of purpose-built student accommodation as buildings that are specifically designed to meet the needs of students, rather than the general community.

Further, paragraph 173 of the NPPF sets out that development requires careful attention to viability and costs in plan-making and decision-taking. Local authorities are required to ensure that plans are deliverable and that sites should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened.

As the key evidence base document for P:24 Student homes, “New Southwark Plan Evidence Base: Housing Policy Viability Study” (September 2015), prepared by BNP Paribas sets out little detail as regards the key assumptions for the viability testing of various development types, including student accommodation.

The evidence base does not include a complete viability appraisal of a hypothetical student accommodation scheme in full detail, nor does it detail build cost assumptions for student accommodation schemes. Table 5.33.1 only details residential base build costs for residential (C3). Clarification as to whether BNP Paribas have utilised these costs for C3 residential for the assumptions for student accommodation appraisals is required.

It is also unclear how conclusions regarding the viability of delivering a significant contribution to affordable housing as part of a purpose-built student accommodation scheme have been reached. The failure to include a complete worked example of a student scheme begs the question as to how

<p>exactly the Council can justify the proposed policy requirement for 35% affordable housing and 27% affordable student rooms in P:24 Student homes.</p> <p>Overall, we question the soundness of P:24 Student homes because of the lack of transparent information included within the BNP report as well as the lack of flexibility, required by BNP, in the current policy wording. This conflicts with the requirements of paragraph 182 of the NPPF, to set out policy that is justified and based on realistic evidence.</p>	
<p>Organisation: King's College London NSPPSV103.1</p> <p>King's College London's comments on the New Southwark Plan</p> <p>1 King's College London has two of its five Campuses in Southwark at London Bridge, alongside Guy's Hospital and at Denmark Hill where the eastern part of its Campus is in Southwark and the western part in Lambeth. King's also owns land at Canada Water which it is to develop for student residences and offices for its professional staff. The Southwark Plan and its contents are therefore fundamental to the future sustainability and growth of King's, particularly in the context of providing economic student residences for its students. Southwark's draft policies for student housing are far more prescriptive than many other London local authorities in terms of having to provide an element of usual tenure affordable housing in respect of both private and university developed accommodation. While it is accepted that affordable housing is a need particularly in London, so is that for students, as is now recognised in the draft new London Plan.</p> <p>2</p> <p>Although it is appreciated that at this stage there is only a limited basis on which the Southwark Plan can be commented on i.e. is it basically sound and deliverable, it is considered that while the Plan has certainly been extensively consulted on over the last two years, its non-conformity with the draft</p>	<p>P24 point 4 recognises and has made allowances for the unique position of HEI direct let and nominated schemes. P24 recognises the role in good quality student accommodation in relieving pressure on wider housing needs through contributions to affordable housing through PBSA schemes. Notwithstanding this, it is important to reduce the risks of an over supply of PBSA at the expense of other forms of accommodation, particularly affordable and family housing for which there is an acute need in the borough as recognised in the Strategic Housing Market Assessment 2019.</p> <p>Viability testing undertaken by BNP Paribas in July 2019 confirms that schemes tested can viably deliver both conventional and affordable housing with up to 27% GLA affordable student accommodation. BNP Paribas concludes that where the viability is demonstrated as challenging by the applicant, the Council's approach of applying their affordable housing and student accommodation policies flexibly, i.e. subject to viability, will ensure that schemes will still be able to come forward whilst delivering the maximum quantum of conventional affordable housing and student accommodation.</p> <p>The requirement for affordable housing in the policy is to address a local</p>

London Plan and the requirements for the provision of affordable housing and discounted rental accommodation for students are questionable in terms of the Plan's soundness and deliverability, against other competing uses, particularly when the evidence base relies on documents, two of which are ten and seven years out of date. The requirements of Policy P24 in terms of also providing 35% by GIA of conventional affordable housing as per policy P4 and 27% of student rooms having to be at the Mayor of London's affordable rent levels mean that neither private providers or higher education institutions will be able to acquire sites for the development of student residences and may also make the deliverability of schemes on pre-owned land undeliverable.

3 The draft New Southwark Plan Policy P4 (Private Rented Homes) potentially allows for greater flexibility in satisfying affordable housing requirements to that which is acceptable for traditional residential schemes built for sale. A "build for rent" or 'collective living' scheme should be able to provide either a traditional affordable housing offer (providing a mixture of social rented and intermediate units) or discount market rent homes at a range of discounts. The accepted size of student rooms in the market should also be acceptable where they are occupied as such, instead of that for build for sale homes. Considering student housing is similar to "built to rent" the same level of flexibility over affordable housing contributions should be extended to student housing schemes. The adoption of the proposed Policy H18 in the London Plan would be more appropriate, subject to the comments in 5 below

4 Overall it is suggested that the policies for student housing should be more in line with those of the draft London Plan and our comments thereon, as summarised in 5 below, to achieve the "soundness test" and that two of the evidence based documents are out of date such that student housing will become increasingly difficult to deliver in Southwark if the policy

acute need of affordable housing in the borough which would otherwise not be met by only requiring the provision of affordable student accommodation.

is not amended.

5 In Policy H17 of the draft London Plan

- (i) the provision of 35% of affordable student housing can be acceptable provided it is related to a range of discount to market values
- (ii) the timing of any requirement for a Nomination Agreement with any HEI or overriding organisation such as the University of London or collection of HEIs should be no earlier than the signing of a section 106 Agreement on a development
- (iii) whilst temporary or other uses should be allowed in any development of student housing it should not have any VAT consequences for the developer as this will simply be passed on to the HEI in higher gross rents .

In Policy H18

- (i) any cash contribution towards affordable housing should be replaced by the provision of discounted rental units for students

Organisation: London School of Economics and Political Science (LSE)
NSPPSV113.5

Representations by London School of Economics and Political Science on The draft New Southwark Plan: Regulation 19 Consultation

These representations have been prepared on behalf of The London School of Economics and Political Science (LSE) regarding the draft New Southwark Plan Proposed Submission Version (NSP) consultation. LSE broadly supports the Council in its objectives to deliver new homes and jobs in the Borough. However to assist the Council in these objectives we set

We will adopt the 2.5 to one ratio of PBSA bedrooms to one unit of conventional C3 housing as set out in the Draft London Plan (July 2019) within our housing monitoring figures.

We note your support on the approach taken for nominated schemes in regards to affordable student homes.

Viability testing undertaken by BNP Paribas in July 2019 confirms that

out a series of amendments aimed at ensuring the NSP is both legal and sound in order to promote good growth throughout the Borough.

Where suggestions are put forward these are designed to help guide the Council on the deliverability of the policies as well as their compliance with the London Plan and other strategic guidance. The Draft London Plan (DLP) was issued by the Mayor of London on 1st December 2017 and is subject to consultation up to the start of March 2018. Many of the key policies within the NSP reflect the wording of the Draft London Plan (DLP) 2017 which will maintain consistency across the policy framework. We have included references where appropriate to the DLP as well as the current adopted London Plan. LSE will be making representations on the Draft London Plan.

The London School of Economics and Political Science (LSE)

LSE ranks second on the world for social sciences (QS World University Rankings 2016-2017) and is classed as world leading for research. The School has a distinct student population, relative to its competitors, with a high proportion of one year Masters students, and a particularly international student body. There were 11,885 students in 2016-2017; 5082 undergraduates and 5,990 graduates. Over 8000 students were from overseas with a majority from non EU countries. The total number of students is set to increase and LSE's investment plans in its campus and student residences reflect its ambition to maintain its place and ranking as a world class university located at the heart of London.

Data shows that LSE postgraduate student demand for accommodation significantly surpasses supply. The School wishes to move to a position where it can guarantee an offer of accommodation to all new first year students. Currently LSE's guarantee is for first year undergraduate students only, while applications for appropriate accommodation from students with disabilities continue to be prioritised. On current projections on student numbers, this amounts to a required capacity of between 6,000 - 7,000 bed spaces in the

schemes tested can viably deliver both conventional and affordable housing with up to 27% GLA affordable student accommodation. BNP Paribas concludes that where the viability is demonstrated as challenging by the applicant, the Council's approach of applying their affordable housing and student accommodation policies flexibly, i.e. subject to viability, will ensure that schemes will still be able to come forward whilst delivering the maximum quantum of conventional affordable housing and student accommodation.

next eight years. Bed space numbers total 4,669 in 2017/18.

The overarching objective of LSE's Student Bed Space Strategy (SBSS) is to continue to attract the brightest students from around the world and enhance the student experience through the provision of a competitive residential offer. This is underpinned by several evidence-based principles including: wishing to make guaranteed offers for all first-year students; having a significant proportion of economy priced bed spaces to meet the demand for affordable accommodation; a location model that meets student demand for sustainable and accessible accommodation; and increasing the number of LSE owned and managed bed spaces.

The unique selling point of LSE residences is that they are within walking distance to the School which is firmly established, and will remain, in the heart of London. LSE therefore seeks growth in accommodation capacity in close proximity to the School campus. This location supports the business model of LSE's renowned Summer School and other student group lettings and also the commercial lettings outside of term time which allows for shorter student contracts and therefore a lower annual cost to students. LSE is keen to work in partnership with local authorities whose policies recognise the School's unique position and contribution.

Representations on behalf of the LSE

The principal area of concern for LSE is the impact the NSP will have on the opportunities to develop the LSE's property at Bankside House. Bankside House currently provides approximately 600 student beds in a converted office building behind Tate Modern. The LSE has a strategic plan to replace the current Bankside House with a substantially improved and larger facility which will cater for the strong demand for places at LSE. The importance of this site is the number of beds it provides and the close proximity to the main LSE campus at Aldwych which is a short walk away.

Please note where paragraph numbers are given, these have been counted down from the relevant section referenced.

P24 Student Homes

The general support for student homes is welcomed but greater support should be shown for the significant benefits and investment student homes bring to the Borough. The Borough is home to a number of universities and a range of student housing developments. The LSE owns and manages Bankside House in Bankside which provides 600 beds for students attending LSE. In addition Bankside House is used out of term time principally as short term accommodation for students attending short courses at the LSE as well as other higher education institutions. The principal student occupiers and summer lets add significantly to the local economy through spending in shops, restaurants and bars and through use of local services. Longer term students who have studied in an area are more likely to stay there after higher education and this adds enormously to the local economy.

Furthermore the provision of student homes counts towards Southwark's housing targets as set by the Mayor of London. Paragraph 4.17.1 of the draft New London Plan is specific in this regard stating "The completion of new PBSA (Purpose Built Student Accommodation) therefore contributes to meeting London's overall housing need and is not in addition to this need. Every three student bedrooms in PBSA that are completed equate to meeting the same need that one conventional housing unit meets, and contribute to meeting a borough's housing target".

It is considered therefore that policy P24 should be written more positively to better reflect the considerable benefits student homes brings to the borough.

The benefit of purpose built student accommodation freeing up existing housing stock should be identified. Students unable to access

accommodation in purpose built halls will rent in the open market often sharing large family homes. Given a landlord can attract more students into such properties; they can charge more, pricing local families out of the market. The Council has specifically noted the demand for family sized dwellings within the Borough as a key driver for Policy P24. In supporting PBSA there is the opportunity to free up larger family homes for their true purpose.

Support is given to the approach to differentiate between direct let and nominated schemes in respect of affordable housing and we would also advocate clearly recognising university owned and managed schemes such as the LSE's. However in our experience nominated and directly owned schemes are in almost all cases unlikely to be able to contribute towards affordable housing due to the viability of achieving this and the imposition of the costs of preparing a viability assessment can be costly and time consuming to a Higher Education Institution (HEI). We consider the policy should be rewritten to remove any requirement for testing of nominated or owned schemes for 'general needs' affordable housing. The approach will support HEI's in their goals to provide improved accommodation for students throughout their campuses and will encourage investment in the student sector by HEIs and others.

The Council's approach to not seek provision of affordable student homes in nominated, and we assume directly owned, schemes is strongly supported. Many HEI's already subsidise student accommodation for students who require assistance. An example of this is the LSE Accommodation Bursary which grants funding to students below certain household incomes in specific accommodation. On this basis the LSE is reviewing the Mayor of London's emerging Policy H17 in the Draft London Plan which seeks the provision of affordable student rooms for all forms of student housing including those being developed by nominated universities. This policy if enacted may have a detrimental impact on the investment in student housing by HEI's and could harm London's role as a major centre for academic excellence.

<p>Individual NSPPSV148.11</p> <p>NSP P23 STUDENT HOMES The policy is unsound as it gives lower standards for students on accessible rooms and on affordable rooms (only 27%) and fails to address student accommodation needs.</p>	<p>P24 does not differentiate or discriminate on room standards. P24 also addresses the need for affordable student rent, while also addressing the need for conventional affordable housing.</p>
<p>Organisation: TH Real Estate NSPPSV183.3</p> <p>The draft policy outlines that purpose-built student housing must, inter alia:</p> <p>“3. When providing direct lets at market rent, provide 35% of the Gross Internal Area of the floorspace as conventional affordable housing, as per policy P4, as a first priority. In addition to this, 27% of student rooms must be let at a rent that is affordable to students; or</p> <p>4. When providing affordable student rooms for nominated further and higher education institutions, provide as much conventional affordable housing as viable, as per policy P4.”</p> <p>Policy P4 referred to above, relates to the provision of ‘Private Rented Homes’ and Table 3 accompanying the policy sets out the requirements for the provision of 35% affordable housing as part of such schemes split between social rent equivalent / affordable rent capped at London Living Rent / affordable rent for household incomes between £60,000 and £90,000 per year.</p> <p>Policy H17 of the draft New London Plan refers to ‘Purpose-built student accommodation’ and advises at criterion 4, that “at least 35% of the accommodation is secured as affordable student accommodation as defined through the London Plan and associated guidance.” Criterion 3 of the policy advises that student accommodation should be secured for occupation by members of one or more specified higher education institutions. The emerging London Plan policy therefore seeks “affordable student</p>	<p>The requirement for affordable housing in the policy is to address a local acute need of affordable housing in the borough which would otherwise not be met by only requiring the provision of affordable student accommodation.</p> <p>Viability testing undertaken by BNP Paribas in July 2019 confirms that schemes tested can viably deliver both conventional and affordable housing with up to 27% GLA affordable student accommodation. BNP Paribas concludes that where the viability is demonstrated as challenging by the applicant, the Council’s approach of applying their affordable housing and student accommodation policies flexibly, i.e. subject to viability, will ensure that schemes will still be able to come forward whilst delivering the maximum quantum of conventional affordable housing and student accommodation.</p> <p>Co-living will be assessed similarly to student schemes under P24. As noted in the supporting text to Policy P24, where the requirement for affordable housing can be exceeded, this will be conventional affordable housing rather than affordable student housing.</p>

accommodation” to be provided as part of purpose-built student accommodation schemes tied to educational institutions. There is no requirement to provide conventional affordable housing under adopted or emerging London Plan policy for purpose-built student accommodation.

As such, whilst there is a recognised need for more affordable housing in the Borough, there is no justification in the Plan for seeking conventional affordable housing as part of purpose built student accommodation schemes and treating such schemes the same as Private Rented Sector schemes, to require affordable housing. Consequently, the requirement to provide conventional affordable housing as part of purpose built student housing schemes is not justified, conflicts with regional planning policy and so, as currently worded, draft Policy P24 is not ‘sound’.

Similarly, the reference in the draft Policy that “direct lets at market rent” should not only provide 35% conventional affordable housing, but also 27% of student rooms let at a rent affordable to students is not justified and is therefore not ‘sound.’

The supporting text to the policy outlines that proposals for ‘collective living’ will be considered in the same way as direct let student accommodation (as set out above) and will therefore require 35% self-contained affordable housing. However, it is not clear if, in addition 27% of rooms must also be let at an affordable rent. If so, this conflicts with the emerging London Plan policy H18 ‘Large-scale purpose-built shared living’ which only seeks a contribution to 35% affordable housing. As such, the requirement for the provision of affordable housing as part of ‘collective living schemes’ needs to be clarified in the supporting text to Policy P24 of the Plan.

We therefore consider that the wording of draft policy P24 is amended to remove the requirement to provide 35% “conventional affordable housing” and is replaced with the requirement only to provide “affordable student accommodation” within student housing, in line with regional planning policy. Clarification in respect of the requirements for ‘collective living’ should also be provided in the supporting text to the policy.

The Collective specialise in delivering and operating high-quality, shared-living rental accommodation across London. Given the focus on shared communal facilities between the residents, they are different from other products on the market and have therefore been termed as 'Co-living'. Representations have previously been made in relation to the preparation of the New Southwark Plan via our planning consultant, DP9. We raised some important points as part of the previous representations however, no adjustments to the draft policies have been made. We therefore wish to reiterate our previous comments which we set out below. Co-living is focused on providing high-quality affordable accommodation for London's working population. It is a market product that relies on no public subsidy. Given the focus on shared communal space, Co-living schemes are not just a home, but create a social experience, bringing people together and creating communities. The result is that people often wish to remain within a Co-living scheme for several years until they reach a different stage of their life. It is therefore a stepping stone on the ladder before more traditional forms of residential accommodation, at a rental price point affordable to London's working population. The affordability of the product will help to keep London's workers living in London, rather than being forced away from their places of work by the rising cost of housing. As highlighted above, the living experience is designed around community via the provision of various amenity spaces and the facilitation of their active use. Whilst some facilities within a Co-living scheme are shared, each tenant would have their own bedroom, which would typically come with an en-suite bathroom. Tenants pay a monthly fee which is inclusive of, but not limited to rent, utility bills, Council Tax, wifi, cleaning and linen change. As a result of this unique accommodation, where the Co-living units do not have exclusive or self-contained facilities required for day to day private domestic existence the units are not classed as dwelling houses and are therefore classified as sui-generis rather than Class C3. A number of London Boroughs have all

Reference to 'collective living' has been changed to 'co-living'.

Specific requirements as set out in your response have not been included within Policy P24, whether referring to student accommodation or co-living. This will be up to the applicant within any planning application to demonstrate as necessary and will be assessed on a case by case basis.

The reference to 'well located in relation to public transport connections' has been removed as it is considered that students use alternative modes of transport e.g. cycling and walking to move around the city, as such, we have not restricted the location of student homes and co-living.

Any approval for student homes or co-living accommodation will be restricted to such a use through a legal agreement.

With regards to affordable housing requirements, any planning application for student homes or co-living, will be expected to provide affordable housing as set out in Policy P24. Any planning application will be required to submit a viability appraisal so the viability of the scheme can be assessed / considered to ensure the maximum viable amount of affordable housing is provided. Where the affordable housing requirement cannot be met, this will be considered on a site-by-site basis.

acknowledged and identified the need to increase the supply of high-quality housing for London's workers. The challenge that London's Boroughs have recognised is the lack of a clear planning policy framework that deals with innovative housing products such as Co-living, and particularly how to deal with affordable housing targets.

The London Plan recognises the increasingly important role the private renting sector (PRS) has in meeting Londoners' diverse housing requirements and Policy 3.8B a1 sets out that the planning system must provide positive and practical support to sustain the contribution of this sector in addressing housing needs and increasing housing delivery. This position is reinforced in Part 4 of the Homes for Londoners: Affordable Housing and Viability SPG 2017 which refers to such products as 'Build to Rent'.

London Plan Policy 3.8 states that Londoners should have a genuine choice of home that they can afford and which meet their requirements for different sizes and types of dwellings in the highest quality environments. A set of criteria were introduced into the Mayor's Housing SPG (2016) recognising the need for this type of specialist housing and sets out guidelines for innovative, non-self-contained accommodation. It is supportive of Co-living schemes in locations with a high PTAL in mixed-use areas, where high quality management can be ensured and unintended user groups such as the homeless can be controlled. It makes it clear that viability appraisals should be undertaken to determine whether affordable housing can be delivered as part of such schemes.

More recently, the Draft London Plan (issued in December 2017) defines Co-living as 'shared living'. Draft Policy H13 relates to housing targets and states that 'shared living schemes should count towards meeting housing targets on the basis of a 3:1 ratio' (where three bedrooms count towards a single home). Furthermore, Draft policy H18 relates to purpose-built shared living (sui-generis) schemes. Where of a good quality and design, these schemes are regarded to have a role in meeting housing need in London if the

development will also contribute to mixed and inclusive neighbourhoods. The criteria to meet this policy includes, inter alia, meeting an identified need, being well-connected to local services and employment by walking, cycling and public transport, being under single management, providing a minimum tenancy of less than three months and communal facilities.

Notwithstanding the above and the clear policy position set by the Draft London Plan, the Proposed Submission of the New Southwark Plan remains as previously drafted. We would therefore like to reiterate our concern that there is no specific policy relating to Co-living. The sub-text to New Southwark Plan Policy P24 (Student Homes) states: "Where there are applications for 'collective living' then these will be considered in the same way as student homes including affordable housing." It is important to note that there are clear distinctions between Co-living and student accommodation therefore it should either have its own policy or be referenced under draft Policy P4 (Private rented homes). As highlighted above, this is also not aligned with the strategic policy position set by the Draft London Plan which has a dedicated and separate policy which covers Co-living (shared living). The term 'collective living' is also incorrect and should be amended to 'Co-living' as this represents the concept rather than a specific provider. In light of the above, we would like to make some recommendations in respect of how Coliving can be appropriately introduced into the New Southwark Plan which we set out below. There is a clear need for non self contained accommodation which is recognised as supporting a growing need in London. Co-living is recognised by the GLA as making a contribution to housing targets and it can reduce pressure on family housing. It can therefore deliver significant benefits for Southwark. It does not address a single type of occupier such as student housing and as such should not be categorised under the same policy.

We feel a clear set of guidelines and standards would be beneficial to ensure the product is delivered in a right way. Topics to be covered in the policy could include:

1. Sites should be well located in relation to public transport connections.

2. Proposals should demonstrate that a specific housing need is being met.
3. An occupation and user profile should be developed in support of proposals to ensure there are not unintended consequences such as co-living is occupied just by students.
4. Requirement for a management and operations plan to be prepared in support of proposals. In terms of affordable housing, Co-living is a market rental product that relies on no public subsidy and typically provides accommodation at rental levels that can be afforded by those who would otherwise qualify for traditional affordable housing provided by Boroughs or Registered Providers. Given that Co-living is a housing product (notably contributing towards housing delivery targets) and does not fall within the current definition of traditional affordable housing, we are currently following the test in relation to what the maximum reasonable contribution this housing product can make towards subsidised affordable housing. As a rental product, which the London Plan recognises has a distinct economic model, and given the rental levels the market derives it will not be able to deliver affordable rental levels for London's workers and also achieve the target market sale levels for traditional affordable housing targeted by the Mayor. Applying Southwark's policies for student housing which align with market sale expectations for affordable housing plus additional rental subsidy unless tied to university institutions is completely inappropriate. Co-living is an innovative open market form of housing closely aligned to the private rented sector. To ensure that Co-living maximises its contribution towards mixed and balanced communities and is meeting a range of housing needs, the suggested approach as schemes come forward is to undertake viability appraisals and focus any subsidy available in one or both of the following ways:
 1. A financial payment to the Borough to bring forward traditional affordable housing to meet the specific local needs.
 2. A discounted market rent approach to a proportion of the co-living units. This would be expected to follow a similar approach to Section 4 (Build to Rent) of the Mayor's Affordable Housing SPG and Southwark's amended Policy P4 (Private Rented Homes) such that subsidised rent levels are provided

on a proportion of the units set at a level to address local needs.

Where this has been explored to date, Co-living has been able to provide for incomes which would cater for those on low starting salaries in their first jobs. It is suggested that policy flexibility is provided for either of these approaches to be considered on a site by site basis, so that Authorities can consider how to maximise affordable housing outcomes from Co-living. We trust that the above comments will be carefully considered as part of the policies for the New Southwark Plan.

Organisation: Unite
NSPPSV198.1

We write on behalf of our client, Unite Students, to submit representations to the consultation on the 'New Southwark Plan: Proposed Submission Version'. We previously made representations on behalf of UNITE to the 'New Southwark Plan: Preferred Option consultation in September 2017.

Unite Students is the UK's leading manager and developer of student accommodation, providing homes for around 50,000 students in more than 140 purpose built properties across 28 of the UK's strongest university towns and cities.

This representation focuses on the draft changes that Southwark have proposed to make to Policy 'P24: Student Homes' as highlighted below (previously draft policy DM22) and our representations are set out in the following paragraphs in response to this.

Draft Policy P24 'Student Homes' of New Southwark's Local Plan
Draft Local Plan Policy P24 'Student Homes' included within the proposed submission version of 'New Southwark Plan' states that purpose built student accommodation must:

1. Provide adequately sized bedrooms and functional indoor communal living space commensurate with the intended number of occupiers sharing the

Student wheelchair users should be offered a range of options in their choice of PBSA, thus it is important there is a reasonable provision of this form of accommodation in PBSA schemes.

Viability testing undertaken by BNP Paribas in July 2019 confirms that schemes tested can viably deliver both conventional and affordable housing with up to 27% GLA affordable student accommodation. BNP Paribas concludes that where the viability is demonstrated as challenging by the applicant, the Council's approach of applying their affordable housing and student accommodation policies flexibly, i.e. subject to viability, will ensure that schemes will still be able to come forward whilst delivering the maximum quantum of conventional affordable housing and student accommodation.

The use of student accommodation during vacation periods for temporary visitor accommodation will be considered on a case by case basis where planning permission is required.

communal space;

2. Provide 10% of student homes as easily adaptable for occupation by wheelchair users;

3. When providing direct lets at market rent, provide 35% of the Gross Internal Area of the floorspace as conventional affordable housing, as per policy P4, as a first priority. In addition to this, 27% of student rooms must be let at rent that is affordable to students; or

4. When providing affordable student rooms for nominated further and higher education institutions provide as much conventional affordable housing as viable, as per policy P4.

The local plan provides the same justification for Policy P24 as previously included for Policy DM22 of the New Southwark Plan: New and Preferred Option Policies’.

We make the following representations and recommendations to part 2, 3 and 4 of Policy P24 ‘Student Homes’. These are detailed as follows.

Part 2- Accessible Student Housing

We question point two regarding the number of wheelchair accessible rooms. Similar requirements for conventional residential accommodation should not be applied to student housing as in reality, the typical demand from students per annum falls significantly below the 10% mark. Further, Building

Regulations require that 5% of units are wheelchair accessible. This ensures that, whether there is a planning policy position on wheelchair housing or otherwise, an element of wheelchair accessible units is provided which is more in line with typical demand for such units. In turn, the increase in student room sizes reduces the overall supply and places more pressure on conventional housing. We therefore recommend that the policy is amended to 5 % and propose the following wording: “Provide 5% of student homes as easily adaptable for occupation by wheelchair users with 1% fitted out.”

Part 3 and 4- Affordable Student Rent

Further to our representation on this point, the proposed affordable student

accommodation requirement is ultimately too high and will restrict the future delivery of high quality schemes. The concept of affordable student accommodation should be considered alongside Borough and Mayoral CIL as the collective amount has a significant impact on the delivery of student schemes and consequently, an impact on the supply of other forms of housing.

Previous approved student accommodation schemes in London provide precedent in that affordable student rent should be reviewed through a viability test or should be set at a lower target. The current percentage of affordable student accommodation set within the New Southwark Draft Local Plan is 27%, this is significantly higher than other boroughs. It is evident that this level is unviable based on the following examples:

- Holbrook House, Acton- 10% of the overall lettable spaces are affordable;
- 140 Wales Farm Road, Acton – 0 affordable student spaces;
- Site at Junction of Western Avenue and Old Oak Road, - 0 affordable student spaces;
- Emperor House, 35 Vine Street – 0 affordable student spaces;
- 4-10 Forest Road, Walthamstow - 0 affordable student spaces; and
- Parkwood House, - Viability review mechanism will be implemented to secure affordable student accommodation.

Therefore, the position on affordable student accommodation should be reconsidered. We recommend that a lower percentage of 10% is set, however if schemes are able to demonstrate that a connection has been made with a higher education provider, point 3 should not apply.

Additional Comments- Use of Student Accommodation during Vacation Periods

Further to our previous representation, we believe that policy P24 'Student Homes should include support for the use of student accommodation during vacation periods for temporary visitor accommodation in line with the aims of the London Plan as outlined below.

Paragraph 3.53A of the London Plan (2016) states that 'the Mayor will

support proactive, partnership working by boroughs, universities and developers to aid the development of student accommodation which is more affordable for the student body as a whole'.

Paragraph 3.9.15 of the Housing SPG adds that 'to enable providers of PBSA to maximise the delivery of affordable student accommodation by increasing the profitability of the development boroughs should consider allowing the temporary use of accommodation during vacation periods for ancillary uses'.

Conclusion

To conclude, our main comments are summarised below:

- Part 2 of Policy 24 'Student Homes' - We recommend that the policy is amended to read "Provide 5% of student homes as easily adaptable for occupation by wheelchair users with 1% fitted out";
- Part 3 of Policy 24 'Student Homes' - We recommend that the policy is amended to set a percentage of 10% in relation to affordable student accommodation and that if a connection with a higher education provider has been made, part 3 should not apply; and
- Additional comments have been made in relation to the use of student accommodation during vacation periods as set out in our previous representations in September 2017.

Please acknowledge receipt of our representations to the Draft Local Plan Policy P24 'Student Homes'. We look forward to discussing matters with you further in the future.

Yours faithfully,