

Representation	Officer Response
<p data-bbox="188 317 551 347">SP1 Quality Affordable Homes</p> <p data-bbox="188 357 365 421">Derek Kinrade NSPPSV47.7</p> <p data-bbox="188 464 1106 708">"SP1: Why is this headed 'Quality affordable homes', when that designation has been deleted in the subsequent text? It is difficult to reconcile 'ensuring' a 50% target whereas in para.3 you are merely encouraging developers to go beyond 35%; in para.4 it would be good to amend "receive' to read 'take advantage of'; para.8: how might this aim be anticipated? ; in para 9, I suggest 'encouraging' rather than 'enabling'. In the whole section should not 'affordable homes' be replaced as in para.1.</p> <p data-bbox="188 751 1113 1106">Reasons: I found this misleading. First, I could not understand the significance of gross and net. In lines 2 and 3, replace 'are building' with 'we have built' (this is retrospective of 2004 to 2019). Para.1 sets out gross averages of around 42% and net 33% of the overall new homes built over this 16 years. This would equate to an average annual total of new homes built of 21,905 (gross) and 19,442 (net), both figures are significantly lower than the future aspiration of 2,355. In para 2 an annual build of new homes is said to be 1860 (gross) and 1560 (net) of which 613 (gross) and 430 (net) were affordable, respectively about 33% and 27.6%, at odds with the figures in para.1.</p> <p data-bbox="188 1149 1055 1270">I suspect that these discrepancies arise from a lack of definition between Council-built housing and other development. But as presented it is very confusing. "</p>	<p data-bbox="1140 464 2152 639">Policy SP1 is called 'Quality affordable homes' as this is line with our Council Plan commitments. However, as set out in the reasons under Policy P1, we do not use the term 'affordable' to describe any specific type or tenure of new housing. We use the descriptive terms of social rented and intermediate, as we do not agree that all the products that fall under 'affordable homes' are affordable to our local residents.</p> <p data-bbox="1140 683 2096 746">These comments are noted. These comments do not change the meaning of the policy/reasons.</p> <p data-bbox="1140 790 2101 853">Further information on the housing completions can be found on the monitoring page on our website here and in the Housing Background Paper.</p> <p data-bbox="1140 896 2085 960">Gross = total number of new homes Net = uplift in new homes (excluding existing units on site that are demolished)</p> <p data-bbox="1140 1003 2152 1141">In relation to the percentage difference between the figures in the reasons, the average delivery of affordable homes per year only considers major schemes (10+ units) which is the requirement in the Southwark Plan and the Core Strategy (Reason 1).</p> <p data-bbox="1140 1184 2112 1248">The number of affordable homes being built annually includes all schemes (minor and major), which is why the figure is lower as a percentage (Reason 2).</p>
<p data-bbox="188 1331 353 1394">Irene Payne NSPPSV454.2</p>	

<p>Older people</p> <p>My comments relate to the soundness of the New Southwark Plan in relation to policies to support older people in adaptable and supported housing in the borough.</p> <p>The plan has a few very general references to older people and lacks specific policy commitments. The new Foreword refers to the Council’s commitment “to make Southwark an age friendly borough” and to “regeneration for all” but the plan is silent on actual examples or commitments.</p> <p>There is no reference to older people in the strategic targets despite the Council’s declared commitment to age friendliness.</p> <p>SP1 Quality affordable homes - makes no reference to older people and gives no indication to developers that Southwark is seeking changes to support adaptable housing. Site allocations make no reference to housing or care facilities for elders and are silent on the possibilities for innovation, for example intergenerational housing. I do not think the plan has been positively prepared in respect of this, it is a gap in the policy – there is no clear policy of quality and affordable homes which cater for old people. There is an assessed need which has not been addressed by any policy commitments.</p>	<p>Policy SP1 relates to all residents in Southwark including older people. Policy P6 considers housing for older people.</p> <p>The Southwark Housing Strategy to 2043 (and is being updated) aims to meet the needs of the older people through a number of ways, including working with partners including health, housing and voluntary organisations to provide quality and affordable age friendly housing across the borough, and to deliver sustainable solutions to address specialist housing needs. We are committed to finding solutions to deliver and adapt properties to enable older residents to live independently as long as possible in their communities. As such, the NSP does not include a fixed target for specialist housing but the policy is clear that provision will be accepted where there is a demonstrated need.</p>
<p>Richard Lee NSPPSV148.2</p> <p>"SP1 Quality Affordable Homes & P1 The changes refer to 50% as a target and replace affordable housing with social rented and intermediate. It is unsound to give social rented and intermediate this sort of equivalence, when the evidence shows the overwhelming need is for social rented. Especially when one considers the new data provided in Reasons point 4.</p>	<p>The Council’s priority is for social rented housing which is set out in Policy P1 and is also recognised in the Housing Strategy which seeks to achieve 11,000 council homes by 2043.</p> <p>50% affordable housing is the aspirational target for the borough. This will be achieved through achieving a higher provision of affordable housing on council</p>

In Policy points 3,4 and 5 the term encouragement is applied to the 50% “target”, which is unsound. This is a loose aspiration, not a requirement. Hence, development management policy P1 does not refer, at all, to the 50% target; instead 35% is the policy norm with 40% in “exceptional circumstances”.

New reasons point out the difference between gross and net social rented housing. The marked difference draws attention to the high number of social rented homes that are being demolished in Southwark (one of the highest in London, if not nationally). Ending large scale demolition would make a significant contribution to meeting the real housing need. Despite this new evidence, no changes have been proposed to Policy P3 protection of existing homes.

The changes give further emphasis to Southwark’s council house building. However, a glance at the housing trajectory table shows that the council housing programme is currently making no contribution to delivery in years 6-15 of the Plan. This needs to be changed to make the Plan sound.

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owned land. This commitment is set out on page 12 (A Fairer Future - a place to belong) of the Council Plan.

The social rented and intermediate housing requirement of 35% is set out in Policy P1 which has been determined through viability testing. It sets a requirement of a minimum of 35% affordable housing to be delivered (with the exception of Aylesbury Area Action Plan area) subject to viability. Where a development can viably provide a greater amount of affordable housing (up to 40%) this will be identified.

We will continue our long-term homebuilding programme, delivering on our commitment to build 11,000 new council homes by 2043. These are not detailed within the house trajectory beyond Year 5, as further work needs to be undertaken to understand where these new homes can be delivered. We work closely with the local resident and Tenants and Residents Association on any development. We have consultation events for residents to find out more and have their say.

The Council Plan 2018/19-2021/22 commitments include introducing ballots on any new estate regeneration and a Consultation Charter to ensure local residents can hold private sector developers to account.

Southwark Law Centre
NSPPSV167.4

"SP1 Quality affordable homes

We submit that this policy has not been positively prepared or justified. There is a desperate need for social and affordable housing in Southwark. There is also an objectively assessed need for more social and affordable housing evidenced in the fact that, at the time of writing, there are 13,000 families on Southwark Council’s housing waiting list. Strategic Policy SP1 states “our target is for 50% of all new homes as social rented and intermediate homes.” This is in line with the London Plan strategic target, however the New Southwark Plan offers very little in the area of policy

The Council’s priority is for social rented housing which is set out in Policy P1 and is also recognised in the Housing Strategy which seeks to achieve 11,000 council homes by 2043.

50% affordable housing is the aspirational target for the borough. This will be achieved through achieving a higher provision of affordable housing on council owned land. This commitment is set out on page 12 (A Fairer Future - a place to belong) of the Council Plan.

<p>commitments to make this strategic goal achievable and effective.</p> <p>"</p>	<p>The social rented and intermediate housing requirement of 35% is set out in Policy P1 which has been determined through viability testing. It sets a requirement of a minimum of 35% affordable housing to be delivered (with the exception of Aylesbury Area Action Plan area) subject to viability. Where a development can viably provide a greater amount of affordable housing (up to 40%) this will be identified.</p>
<p>Living Bankside NSPPSV239.2</p> <p>"Quality Affordable Homes This policy does not set an evidenced based housing target; it only relies on the London Plan housing target and therefore cannot be considered robust or sound as evidence does not illustrate how it would be realised. Therefore it is not justified. evidence is not provided to illustrate the demand for the types of housing needed in the Borough and therefore the housing target is unsound."</p>	<p>The policy has been informed by the Strategic Housing Market Assessment 2019 which identifies housing need in the borough and housing viability testing, with the most recent update from 2019.</p>
<p>Union 4 on behalf of Caddick Developments NSPPSV497.2</p> <p>"Housing Policies Policy SP1 of the New Southwark Plan is entitled 'Quality Affordable Homes' and includes the following statement regarding the difficulties younger people are experiencing with a lack of affordable accommodation in the borough: "It is widely recognised that rising rent and property prices in the private sector, the loss of council homes through the 'Right to Buy', and a lack of affordable housing means that younger generations may be forced to move away from their families and communities." The development management policies set out in the New Local Plan include eleven housing policies, including policies for private rented homes, student homes and housing for older people. However, one area of accommodation which is missing from the list of housing policies is that of large-scale purpose-built shared living as set out in London Plan Policy H16, often</p>	<p>Co-living is considered under Policy P5 student accommodation, see reason 5.</p>

referred to as co-living. This is an aspect that is not addressed by the modifications and where a further modification could bring the Local Plan in line with the London Plan.

Shared living is a relatively new concept, which is primarily a response to the needs of a more dynamic population that require a good quality of accommodation and which benefit from the supporting facilities and services, sense of community and inclusion that shared living can provide. This is relevant to large parts of the borough and to the emerging changes in the rental market. A significant proportion of Londoners can no longer afford to rent or buy within the traditional housing market. They are often forced to rely on limited housing choice and rent substandard accommodation. The sector has to date been hidden in the 'other' category of housing need, partly as house and flat shares and in some cases licensed and unlicensed HMOs. Modern co-living proposals provide a high quality, managed solution that provides a wider range of services and a higher quality of accommodation, on secure tenancies and enabling independent and flexible living that suits the needs of local people and a flexible workforce.

The concept of shared living is recognised in the Intend to Publish version of the London Plan, with Policy H16 setting out the criteria that large-scale purpose-built shared living developments are expected to meet. Paragraph 4.16.1 of the Intend to Publish version of the London Plan states that large-scale shared living developments may provide a housing option for single person households who cannot or choose not to live in self-contained homes or HMOs. It is noted that the letter from the Secretary of State for Housing, Communities & Local Government to the Mayor of London on 13 March 2020 does not include proposed modifications to Policy H16.

There is an increasing demand for shared living accommodation across London and it is a form of accommodation which serves a specific role within the housing market. Demand from single occupiers places a strain on the existing housing stock throughout Southwark and is evidenced in the high proportion of HMOs in certain parts of the borough. Many of these are typically in older conversions of former houses and are of a poor standard. Shared living accommodation, which is carefully considered in terms of its

<p>location and design, has the potential to provide a new and enhanced quality of accommodation, which can create long-term and sustainable communities.</p> <p>Shared living is one aspect of the housing market which has the potential to address the difficulties younger people experience in accessing accommodation at affordable prices in the borough, as set out in Policy SP1 of the New Southwark Plan. We would submit that a specific policy for shared living would ensure that the New Southwark Plan is 'positively prepared' and 'effective', in accordance with Paragraph 35 of the NPPF."</p>	
<p>Ceila Cronin NSPPSV32.1</p> <p>" EIP 27B SP1 Quality Affordable Homes This policy is not sound as not positively prepared, justified or effective. In spite of the fact, for example that it claims to ensure 'vulnerable residents and families are helped to find the right housing to live as independently as possible,' there does not seem to be any attempt to ensure increased provision of this type of housing. (Further, I believe that housing for the elderly would be part of this group, too and almost all the Site Allocations that originally mentioned provision of 'extra- care housing' for the elderly, have been removed in this version). "</p>	<p>The Southwark Housing Strategy to 2043 (and is being updated) aims to meet the needs of the older people through a number of ways, including working with partners including health, housing and voluntary organisations to provide quality and affordable age friendly housing across the borough, and to deliver sustainable solutions to address specialist housing needs. We are committed to finding solutions to deliver and adapt properties to enable older residents and people with disabilities to live independently as long as possible in their communities. As such, the NSP does not include a fixed target for specialist housing but the policy is clear that provision will be accepted where there is a demonstrated need.</p>
<p>CBRE Ltd on behalf of Royal London NSPPSV344..3</p> <p>SP1 As noted above we support the Council's ambition to exceed its housing target of 2,355 dwellings per annum. We also acknowledge the need for affordable housing and support the ambition to in this policy to build 11,000 new Council homes including through developing Southwark's own land. Whilst Royal London will seek to deliver as much affordable housing as is viable on the Six Bridges site, including through grant should it be available, viability and site specific constraints will need to be acknowledged through</p>	<p>Noted.</p>

the planning application process particularly on a site such as Six Bridges which is balancing a number of complex and competing considerations in relation to the mixing of industrial and residential uses.

Representation	Officer Response
<p data-bbox="188 317 696 347">P1 Social rented and intermediate housing</p> <p data-bbox="188 357 501 421">Liam Hennessy Architects NSPPSV380.6</p> <p data-bbox="188 464 1111 999"> "Do you consider this policy is sound? - why not sound - Justified Do you consider this policy is sound? - why not sound - Effective Do you consider this policy is sound? - why not sound - Positively Prepared Southwark Council is harming social housing in the Borough: the most recent Annual Monitoring Report (AMR 15) from the GLA put Southwark's pipeline for social rented homes as the second worst Borough in London - a pipeline of Minus 992 social rented homes. The reality for social housing is even worse, as figures for demolitions are not counted ""until redevelopments on the same sites are completed in their entirety"" so right now about 900 council homes demolished on the Heygate have not yet been counted, years later, and hundreds more being demolished on the Aylesbury also have not been counted. Southwark Council needs to stop harming social housing. The Council's record over the past 8 years has been worse than abysmal - severely harming social housing." </p>	<p data-bbox="1140 464 2051 818"> The decision to demolish council housing requires significant consultation with residents and surveys of the existing property conditions are undertaken to bring forward options for estate redevelopment. Large estate redevelopment takes a number of years to be completed and there is a Council Plan commitment that commits us 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. It is important that residents have safe and secure living conditions which is why estate regeneration is carried out in consultation with residents. </p> <p data-bbox="1140 860 2051 962"> The Council Plan 2018/19-2021/22 commitments include introducing ballots on any new estate regeneration and a Consultation Charter to ensure local residents can hold private sector developers to account. </p> <p data-bbox="1140 1007 2051 1074"> We will continue our long-term homebuilding programme, delivering on our commitment to build 11,000 new council homes by 2043. </p>
<p data-bbox="188 1158 719 1222">Guys and St Thomas' NHS Foundation Trust NSPPSV76.8</p> <p data-bbox="188 1264 1111 1436"> "Affordable Housing The Trust aims to attract and retain a diverse and sustainable workforce, and the development of affordable housing in both the rental and intermediate market supports this. The Trust supports the minimum provision of 35% affordable housing within the Borough as set out in Draft Policy P1 'Social </p>	<p data-bbox="1140 1264 2051 1366"> Noted. An intermediate rent waiting list is being implemented by the council and will prioritise key workers for intermediate rental properties who meet the criteria. </p>

Rented and Intermediate Housing’.

The Trust requests the recognition of key worker housing as a form of affordable housing. The Trust raises its interest in working with developers in Southwark for the provision of such housing for its healthcare employees and Trust staff accommodation."

DP9 on behalf of British Land
NSPPSV158.2

"Policy P1: Social Rented and Intermediate Housing
Shared Ownership Value Cap

British Land considers that the introduction of a Shared Ownership value cap is not an appropriate restriction to place on Share Ownership homes. The explanation of the policy suggests that Shared Ownership homes must not have an open market value which exceeds £600,000. This is stated at paragraph 6 of the reasons supporting the policy and also in the "Social rented and intermediate housing products" fact box which notes that "The Mayor states the open market value of a Shared Ownership home should not exceed £600,000."

The open market value restriction is not appropriate for the following reasons:

- The restriction is unnecessary as household income caps are already provided for and ensure that intermediate homes are affordable to those in need of them (i.e. households with incomes of £20,000 to £90,000 as indicated in the Figure 2 in the policy).
- The restriction would prevent the delivery of many family homes with values in excess of £600,000 but which are affordable below the £90,000 income cap. For example, a 3 bed home at GLA space standards with a value of £700/ft² (a level which much of the borough exceeds) would have a capital value of £647,500 but would be affordable at an income of £63,000. The Council's proposal would therefore prevent delivery of this home, even though it falls within its affordability criteria.

Reference to £600,000 will be removed from the fact box.

London Living Rent (LLR) is the priority for delivery of intermediate rent for Southwark as it is the most affordable intermediate rent level and there is a significant number of people in need of housing at this rent level as identified in the [Strategic Housing Market Assessment 2019](#). The level of need is more acute than people that can afford higher discount market rent levels as there are more options for people with a higher income to access housing on the open market.

Starter homes are referenced in the National Planning Policy Framework.

- There is no GLA policy supporting the £600,000 cap. The cap is only referenced as guidance within the Affordable Housing and Viability SPG (2017) and this guidance merely states that “Generally shared ownership is not appropriate where unrestricted market values of a home exceed £600,000”

In light of the above, the text referencing the £600,000 value cap should therefore be deleted.

Discount Market Rent Acceptability

The “Social rented and intermediate housing products” fact box states that Discount Market Rent (DMR) homes will only be acceptable when provided at London Living Rent levels aimed at households who aspire to home ownership.

The restriction of DMR to Living Rent levels is not appropriate for the following reasons:

- As indicated by the Council’s Figure 2, a large number of households in the borough earn less than £60,000 but more than the level at which they may access social rent homes (indicated to be £20,000 within Figure 2).

Restricting DMR to Living Rent levels would prevent the delivery of DMR homes suited to a number of these households. For example, the average Living Rent for a 2 bed home in Southwark is currently £1,047 per month, requiring a household income of c.£45,000. However, the Council’s data indicates that c.17,000 households have an income of £45,000 to £60,000. In some cases it may therefore be appropriate to set DMR rent levels above Living Rents to target these households, which in many cases will maximise delivery of affordable homes.

- The restriction to Living Rent is not aligned to paragraph 5 of the reasons below the policy which simply states that Southwark prioritises Living Rent levels within DMR.

- The reference to “households who aspire to home ownership” is not appropriate. The essence of DMR housing is that it offers high quality homes, professionally managed and with capped rent increases and longer tenancies which can be renewed. Many residents may therefore welcome this convenience and security and not aspire to home ownership.

<p>The fact box should be amended to clarify that DMR homes aligned to a range of household incomes up to £60,000 are permitted.</p> <p>First Homes</p> <p>The current policy references Starter Homes which the government has now replaced with First Homes. Given government's stated intention to maximise the delivery of First Homes the policy should be amended to make reference to this product and that it is an acceptable form of intermediate housing."</p>	
<p>Janine Rowe NSPPSV92.2</p> <p>"P1: Social rented and intermediate housing. I do not think this policy is positively prepared or effective.</p> <p>Whilst the Fast Track process for developments is consistent with the London Plan in not requiring a viability assessment for those that provide 40% tenure compliant affordable provision, it is not consistent with the mix of social housing required for existing residents of the Borough on the housing waiting list.</p> <p>I can expand on this in further evidence. "</p>	<p>The Council's priority is for social rented housing which is set out in Policy P1 and is also recognised in the Housing Strategy which seeks to achieve 11,000 council homes by 2043.</p>
<p>Steve Lancashire NSPPSV172.11</p> <p>"This is a central issue for the borough, particularly given the permissions along the riverside, at the Elephant and Castle, the Aylesbury Estate sites and many other smaller developments, particularly but not exclusively in the north of the borough. Specific issues not covered sufficiently clearly or specifically are the following.</p> <ul style="list-style-type: none"> • Very specific definitions of what is affordable is essential and should not be based on market forces in Southwark, which have been so heavily 	<p>The policy has been informed by the Strategic Housing Market Assessment 2019 which identifies housing need in the borough and housing viability testing, with the most recent update from 2019.</p> <p>Policy P1 clearly sets out what the affordable housing requirements are in developments coming forward. The Council's priority is for social rented housing which is set out in Policy P1 and is also recognised in the Housing</p>

distorted by property speculation that they have rendered any definition of affordability which is not tied to incomes meaningless. Further the use and impact of percentages and the use of various shared ownership tools over the past 20 years in the Borough needs to be examined. I do not think that policy P1 and P4 have been positively prepared in this respect, as they have not been based on a credible evidence base that they meet the desperate need for social and affordable housing in Southwark.

- Conversely, why is so much unaffordable housing being built? What is the definition of an unaffordable home?
- Full viability assessments should be made and publicised, made subject to public scrutiny
- The build to rent proposals need careful examination and loopholes relating to tenancy terms and covenants closed
- The proposal relating to student homes is unclear – this urgently needs re-assessing because of the pandemic. At present this policy is unsound because the objectively assessed need for student housing in the borough has changed, and with the move towards more digital learning this is likely to remain for some time.
- There need to be much stricter standards of building design, room sizes and in relation to open space.
- There is a great lack of reference to policies to support older people in adaptable and supported housing in the borough.

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Strategy which seeks to achieve 11,000 council homes by 2043.

50% affordable housing is the aspirational target for the borough. This will be achieved through achieving a higher provision of affordable housing on council owned land. This commitment is set out on page 12 (A Fairer Future - a place to belong) of the Council Plan.

The affordable housing requirement of 35% is set out in Policy P1 which has been determined through viability testing. It sets a requirement of a minimum of 35% affordable housing to be delivered (with the exception of Aylesbury Area Action Plan area) subject to viability. Where a development can viably provide a greater amount of affordable housing (up to 40%) this will be identified.

Build to rent requirements are set out in Policy P4, which includes requirements for the tenancy to be a minimum of three years with a six-month break clause in the tenant's favour and structured and limited in-tenancy rent increases agreed in advance.

Policy SP2 and the associated development management policies within the New Southwark Plan set out the standards required relating to building design, room size and open space.

The Southwark Housing Strategy to 2043 (and is being updated) aims to meet the needs of the older people through a number of ways, including working with partners including health, housing and voluntary organisations to provide quality and affordable age friendly housing across the borough, and to deliver sustainable solutions to address specialist housing needs. We are committed to finding solutions to deliver and adapt properties to enable older residents and people with disabilities to live independently as long as possible in their communities. As such, the NSP does not include a fixed target for specialist housing but the policy is clear that provision will be accepted where there is a demonstrated need.

WYG on behalf of John Lyons Charity
NSPSSV214.12

"Policy P1: Social Rented and Intermediate housing
The Charity fully supports the principle of affordable housing provision in new developments and its importance in creating successful communities. There are however concerns relating to Points 3 and 4 under the "Percentage" section of the policy. Point 3 of the policy seeks viability appraisals from all developments, however, point 4, which refers to the Fast Track route, states that: "Where developments follow the fast track route, they will not be subject to a viability appraisal". Point 3 should therefore be amended to clarify that viability appraisals will not be needed for proposals that meet all of the criteria for the fast track route.
Point 4 refers to "exceptional circumstances" that allow the Fast Track route to be used. We do not consider that this additional text is required as this is superfluous. In addition, the use of a 40% threshold to use the Fast Track route is contrary to the threshold target of 35% as set by the Mayor in the draft (Intend to Publish) London Plan (Policy H5). The policy is considered unsound and should be amended to reflect strategic planning policy as set out in the Intend to Publish London Plan."

Point 4 sets out 'in exceptional circumstances' and in these circumstances it is clear that where developments follow the fast track route they will not be subject to a viability appraisal. It will only be necessary if amendments are proposed to lower the social rented and intermediate housing provision to less than 40% following the grant of planning permission or less than 60% in the case of developments in the Aylesbury Area Action Plan area.

The fast track route provides an incentive for developers to push up their affordable housing provision as they can fast track their application. We have set a higher threshold than the Draft London Plan given our acute need to deliver affordable housing. Most of our planning applications coming forward are meeting 35% affordable housing with the greatest providing 40.5% and therefore we want to ensure we can increase the provision further. If the fast track route is not being taken, the applicant has the option to follow the viability tested route. The reason for the higher fast track threshold is due to the acute need of affordable housing of 2,077 homes per annum in the borough as identified in the SHMA 2019, therefore this figure is higher than the figure proposed in the Draft London Plan given the local need.

WSP on behalf of Apex Investment Group
NSPSSV474.2

"Policy P1: Social Rented and Intermediate Housing
Subject to viability, we are supportive of the target to provide a minimum of 35% affordable homes on new sites in line with the adopted London Plan target, especially in view of Southwark's affordable housing shortfall and historic under-delivery.
We are, therefore, supportive of the policy target remaining at 35% affordable housing provision on sites of 10 or more new homes subject to viability, which is in conformity with the London Plan (2016). This recognises

Noted.

<p>that the delivery of affordable housing needs to be balanced against the viability of delivering sites for development."</p>	
<p>Q Square on behalf of Regent Land and Development NSPPSV476.2</p> <p>"P1 (Social Rent and Intermediate Housing) The Council states that London Affordable Rent, Affordable Rent and Discount Market Rent are not considered to be affordable products and will not therefore be considered. Soundness Test The position that the Council has adopted is not justified on the basis that these affordable housing products are recognised and utilised successfully by many other local planning authorities. It is also not consistent with Draft New London Plan Policies H6 and H11. "</p>	<p>London Living Rent (LLR) is the priority for delivery of intermediate rent for Southwark as it is the most affordable intermediate rent level and there is a significant number of people in need of housing at this rent level as identified in the Strategic Housing Market Assessment 2019. The level of need is more acute than people that can afford higher discount market rent levels as there are more options for people with a higher income to access housing on the open market.</p>
<p>Southwark Law Centre NSPPSV167.6</p> <p>"P1 Social rented and intermediate homes The London Plan has a target of 50% affordable housing for grant funded developments for them to be allowed to be considered for the fast-track route, and developers need to show that they have considered the grant subsidy to try to increase the affordable level of housing.</p> <p>This policy should explicitly state that household with incomes between £60,000 – £90,000 can have their needs met through either shared ownership or market housing, and they should therefore not be eligible for other intermediate housing. There should be stringent measures to ensure that the majority of intermediate housing offers on developments do not cater for households in that higher income threshold.</p>	<p>Noted.</p> <p>This is referenced in Reason 6.</p>
<p>Living Bankside NSPPSV239.2</p>	

<p>"Social Rented & Intermediate Homes The policy requirement should be a minimum of 50% of all housing on site at social rent. There would be evidence to ensure this policy is sound and justified."</p>	<p>The affordable housing target of 35% is set out in Policy P1 which has been determined through viability testing. It sets a requirement of a minimum of 35% affordable housing to be delivered (with the exception of Aylesbury Area Action Plan area) subject to viability. Where a development is providing 40% affordable housing or 60% affordable housing in the Aylesbury Action Area Plan area the fast track route can be followed where a viability appraisal does not need to be provided. Policy P1 requires viability appraisals to be submitted with all planning applications to be validated where they are not following the fast track route. This will ensure the maximum viable provision of affordable housing can be achieved. Where a development can viably provide a greater amount of affordable housing (up to 40%) this will be identified.</p> <p>The policy has been informed by the Strategic Housing Market Assessment 2019 which identifies housing need in the borough and housing viability testing, with the most recent update from 2019.</p>
<p>Caroline Courtois NSPPSV496.5</p> <p>Next, while I appreciated the clear indicators for Southwark Council in terms of number of homes and offices/ shop space created, I would have liked to see the same level of measurable indicators in terms of 'encouraging' developers to provide more social rented and intermediate housing. Clear percentage must be set up by regulation or the Council will face a situation where existing estate are extended horizontally and vertically to saturation while developers continue building flats accessible only to a minority and not solving the problem of housing in London. "encouraging" developers is not sufficient.</p>	<p>Noted. The policy requires development to provide a minimum of 35% social rented and intermediate housing.</p>
<p>CBRE Ltd on behalf of Royal London NSPPSV344.6</p>	

Royal London maintains comments made previously. In relation to the fast track route to viability, the 40% requirement goes above and beyond the Intend to Publish London Plan which sets the fast track route at 35%. It is not clear why the NSP sets a more onerous requirement and why this is justified. Furthermore, it is not clear how the viability review process would work in practice i.e. in terms of subsequent reviews following the initial viability appraisal at application stage. Sites released from industrial use such as the Six Bridges Estate which have been identified for redevelopment in the NSP and the Old Kent Road Area Action Plan have the objective to deliver innovative mixing of industrial and residential use. This is a new concept and will be complex and risky to deliver with significant additional viability challenges. In recognition of this, Royal London challenge the increase in the threshold for viability testing from 35% to 40% and consider the position should be consistent with the Intend to Publish London Plan.

The fast track route provides an incentive for developers to push up their affordable housing provision as they can fast track their application. We have set a higher threshold than the Draft London Plan given our acute need to deliver affordable housing. Most of our planning applications coming forward are meeting 35% affordable housing with the greatest providing 40.5% and therefore we want to ensure we can increase the provision further. If the fast track route is not being taken, the applicant has the option to follow the viability tested route.

The reason for the higher fast track threshold is due to the acute need of affordable housing of 2,077 homes per annum in the borough as identified in the SHMA 2019, therefore this figure is higher than the figure proposed in the Draft London Plan given the local need.

GLA
NSPPSV66.3

"The Mayor is pleased to see the requirement for 10 or more homes to provide a minimum of 35% affordable housing in accordance with Policy H5 of the ItP London Plan. However, the Mayor remains concerned that Policy P1 sets a higher affordable housing threshold for developments following the fast track route than that set out in Policy H5 of the ItP London Plan. Southwark needs to ensure that its threshold and overall approach is justified. The approach needs to incentivise applicants to meet the threshold and choose the fast track route. If the threshold is not generally achievable, it cannot be taken up by applicants, effectively ruling out the fast track route. If there is no incentive for developers to meet a consistent affordable housing target, the approach in the NSP is effectively 'the maximum reasonable'. This will not maximise the delivery of affordable housing across London as a whole and a fixed affordable housing percentage will not be embedded into land values over time, in accordance with ItP Policy DF1. A fixed threshold that is evidenced such as the 35% and 50% thresholds set out in the London

The fast track route provides an incentive for developers to push up their affordable housing provision as they can fast track their application. We have set a higher threshold than the Draft London Plan given our acute need to deliver affordable housing. Most of our planning applications coming forward are meeting 35% affordable housing with the greatest providing 40.5% and therefore we want to ensure we can increase the provision further. If the fast track route is not being taken, the applicant has the option to follow the viability tested route.

The reason for the higher fast track threshold is due to the acute need of affordable housing of 2,077 homes per annum in the borough as identified in the SHMA 2019, therefore this figure is higher than the figure proposed in the Draft London Plan given the local need.

The Old Kent Road Opportunity Area Viability Study (April 2016) prepared by

<p>Plan, provides certainty and seeks to embed affordable housing requirements in land values and avoids circumstances, which have become prevalent over recent years, where a lack of clarity regarding affordable housing requirements contributed to uncertainty in the land acquisition process. This introduced a circularity in which developers overpaid for sites and then attempted to recover some or all overpayment through reductions in affordable housing provision.</p> <p>The threshold set out in the ItP London Plan for development on public sector land is 50% affordable housing. The threshold is also set at 50% affordable housing for development on SIL, LSIS and other industrial sites deemed appropriate for residential uses where there is a net loss in industrial capacity. As the NSP is proposing the release of industrial land within the borough, this approach should be referenced in the NSP in accordance with Policy H5 of the ItP London Plan."</p>	<p>BNP Paribas Real Estate on behalf of Southwark considers the viability of meeting planning policy requirements as set out in the New Southwark Plan and the Old Kent Road Area Action Plan for development in the Old Kent Road opportunity area.</p> <p>The testing confirms that the Council’s policy requirement of 35% affordable housing is acceptable. In some instances, subject to their benchmark land value and grant funding available, sites can achieve higher provisions of affordable housing (45% affordable housing). The study also confirms that some schemes have challenging viability.</p> <p>Although some sites can deliver 45% affordable housing, industrial sites can incur exceptional costs which can be an issue for development viability. Our flexible approach to affordable housing in the Borough (including Old Kent Road action area) ensures full consideration can be given to the viability of redeveloping sites.</p> <p>It is unviable to set a threshold approach of 50% affordable housing on Strategic Industrial Locations, Locally Significant Industrial Sites and Non-Designated Industrial Sites appropriate for residential uses where the scheme would result in a net loss of industrial capacity. Expecting 50% affordable housing to be provided on industrial land, particularly on Old Kent Road may have significant consequences on the viability of schemes coming forward, and as such, this requirement is not applied in Policy P1.</p>
<p>TfL Commercial Development NSPPSV182.</p> <p>"P1: Social Rented and Intermediate Housing As set out in our response to the Proposed Submission Version Amended Policies, TfL CD consider that Policy P1 should be titled “Affordable Housing” rather than “Social Rented and Intermediate Housing” to ensure general</p>	<p>The fast track route provides an incentive for developers to push up their affordable housing provision as they can fast track their application. We have set a higher threshold than the Draft London Plan given our acute need to deliver affordable housing. Most of our planning applications coming forward</p>

conformity with accepted definitions and / or terminology.

Equally, in accordance with the draft London Plan, TfL CD consider it appropriate for Policy P1's supporting text to make clear that development can provide a mix of different affordable housing tenures, whilst acknowledging that the Mayor's preferred affordable housing tenures (Paragraph 4.7.3 of the London Plan) are as follows:

- Homes based on social rent levels, including Social Rent and London Affordable Rent;
- London Living Rent;
- London Shared Ownership.

Acknowledged within our letter of May 2019, TfL CD recognised that Policy P1 introduced a "fast track route" for housing development, removing the requirement for viability testing should development provide at least 40% affordable housing and 60% within the Aylesbury Area Action Plan area. This does not conform to either the London Plan or the Mayor's Homes for Londoners Affordable Housing and Viability SPG (adopted in 2017), both of which require a provision of 35% affordable housing in order to benefit from the fast track route. We recommend that the requirement be either removed or amended to conform with the London Plan.

In addition, and critically for TfL CD, the current requirement undermines our 'portfolio agreement' for affordable housing delivery. Paragraph 4.6.5 of the draft London Plan stipulates that "Where there is an agreement with the Mayor to deliver at least 50 per cent [affordable housing] across the portfolio of sites, then the 35 per cent threshold should apply to individual sites.". On this basis, as TfL must deliver at least 50% affordable housing across our portfolio, with a minimum of 35% provided on every site, the affordable housing requirements set out within Policy P1 remain unjustified and put the efficient delivery of affordable housing provisions at risk within the borough."

are meeting 35% affordable housing with the greatest providing 40.5% and therefore we want to ensure we can increase the provision further. If the fast track route is not being taken, the applicant has the option to follow the viability tested route.

The reason for the higher fast track threshold is due to the acute need of affordable housing of 2,077 homes per annum in the borough as identified in the SHMA 2019, therefore this figure is higher than the figure proposed in the Draft London Plan given the local need.

Representation	Officer Response
P2 New family homes	
DP9 on behalf of British Land NSPPSV158.3	
<p>"Policy P2 New Family Homes Social Rent Home Bedroom Sizes The updated draft policy P2 notes that single occupancy bedrooms in social rented homes will not be accepted. The principle that affordable homes should be weighted towards larger types (e.g. 2B/4P rather than 2B/3P). However, the change to prevent any single bedrooms would be overly restrictive and reduce the ability of future schemes to meet local needs in the best way possible. Particular areas of concern include:</p> <ul style="list-style-type: none"> • A mix of singles and doubles, weighted towards doubles, allows flexibility to meet the needs of different family sizes. • Registered providers prefer to have a mix of unit types to meet the wide range of needs that they have to meet. • A mix of dwelling types allows the provision of homes to be maximised where there are design constraints due to site size / shape or other issues impacting on the form of the building. • Table 4.15 in the Southwark Strategic Housing Assessment Update 2019 notes that 14% of households contain one dependent child – this is a significant proportion of need for which 2B/3P homes would be well suited. Many recent schemes (including within the Council’s own housebuilding programme) have been approved at Committee with a proportion of single occupancy bedrooms. Table 2.1 demonstrates that a wide mix of unit sizes are being proposed across different schemes. This suggests that developers and their Registered Providers are using current flexibilities to best balance local housing needs, management considerations and the constraints of each site. As such there is no evidence that a prescriptive requirement for solely double bedrooms is required. 	<p>Policy P2 requires social rented units to provide the maximum number of bed spaces for the number of bedrooms to ensure the bedrooms are larger and where there are families living in the homes, the bedrooms can be occupied by more than one child as required.</p>

(Please refer to number 23 in the consultation responses to the table references)

Janine Rowe
NSPPSV92.3

"P2: New Family Homes. I do not think this policy is positively prepared or effective.

This policy has been amended to include the Old Kent Road. It states that development is required to provide 20% family homes but notes that major schemes already approved on the OKR are delivering 20%, or less and may be constrained by design and viability from providing a greater percentage. The NSP states delivery of family housing is being prioritised in the affordable housing element of the schemes, where this need is highest.

This policy has not been effective within the OKR. On one major site, approved in Oct 2018, of 1,152 units just 55 are 3 bedded. There are no units above 3 beds. There are approximately 3,500 families on the housing waiting list in the OKR area, the majority are for housing of 3+ bedrooms.

I can expand on this in further evidence.

I think the NSP is unsound as it is reliant on delivery of housing within the OKR site allocations that is predicated on the delivery of the Bakerloo Line Extension which has now been shelved by TfL indefinitely. This may render some developments (approved but not yet delivered) financially unviable.

"

Schemes will be required to provide three or more bedrooms as set out within the policy, where this is not proposed, this will need to be justified through the provision of robust evidence.

SE5 Forum
NSPPSV465.9

"Test of soundness Not effective

P2.6 states Family homes in apartment blocks should have direct access to outdoor amenity space and allow oversight of children outside so children will be encouraged to use the space and can safely do so. This policy is not effective. As set out above the Camberwell Lanes development flats in the proposed scheme do not have private amenity space, residents will need to pass the access used by neighbours to sit outside, within half a metre of their bedroom window.

"

The policy requires family homes in apartment blocks to have direct access to outdoor amenity space and allow oversight of children outside so children will be encouraged to use this space and safely do so. Where this requirement is not met, this will need to be justified through the provision of robust evidence.

Policy P14 requires the provision of private amenity space for houses and flatted developments. For flatted developments, where this is not met, the shortfall is required to be added to the communal amenity space requirement. Where this is not proposed a financial contribution will be required which will go towards providing new or improving existing public open space or play space provision in the vicinity of the site.

WSP on behalf of Apex Investment Group
NSPPSV474.3

"Policy P2: New Family Homes

We support the provision of family housing within the Old Kent Road Area Action Core. Whilst it is recognised that a proportion of larger units will be delivered as affordable homes for social rent, there is a concern that the policy provision of a minimum of 60% of homes with two or more bedrooms and a minimum of 20% of family homes with three or more bedrooms may result in the development of large numbers of family sized apartments which are not as appealing to the market as one or two-bedroom units. It is well understood that families do not like apartment living.

The prospect of families choosing to live in inner London is likely to reduce even further post Covid-19. Developing accommodation that is not wanted or required is wholly unsustainable. Therefore, we consider this policy to be

The SHMA shows that for market housing there is a requirement of 20% one bed homes, 30% two-bed homes, 34% 3-bed homes and 16% four-bed homes which informs the policy.

unsound and unjustified. A pragmatic approach should be taken to the application of this policy target."

Julie Brinkley
NSPPSV503.3

P2 New family homes states that "Family homes in apartment blocks should have direct access to outdoor amenity space and allow oversight of children outside so children will be encouraged to use the space and can safely do so." However it is not explained how this can be accommodated in a tall building. If the policy is intended to address the (very real) local housing need particularly in affordable family housing, then it has not been positively prepared because it does not show how a tall building will do this, as compared with other typologies, see below for further explanation of this point.

"

This will need to be considered through the design of the development to achieve the policy requirement of family homes in apartment blocks having direct access to outdoor amenity space and allow oversight of children outside.

Representation	Officer Response
<p data-bbox="181 312 488 347">P4 Private rented homes</p> <p data-bbox="181 352 611 421">CBRE Ltd n behalf of Royal London NSPPSV344.7</p> <p data-bbox="181 459 1108 962">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. As set out in our previous representations, the policy sits in contrast to now Intend to Publish London Plan Policy H11 on Build to Rent which provides different affordable housing requirements and allows the affordable housing offer to be solely Discounted Market Rent and if following the fast track route as least 30% should be London Living Rent. In order to ensure consistency with the Intend to Publish London Plan Policy H11 and to encourage the development of this sector we consider that Policy P4 should be amended to be consistent with the requirements of Intend to Publish London Plan. The Policy should also be consistent with the Intend to Publish London Plan in terms of the requirements for viability review and the fast track route where a policy compliant affordable housing offer is proposed.</p>	<p data-bbox="1126 459 1794 491">Comment made to the Amended Policies consultation.</p> <p data-bbox="1126 528 2069 778">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 data-bbox="1126 815 2069 1034">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. 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 data-bbox="181 1106 701 1174">Savills on behalf of Newington Square Ltd NSPPSV484.4</p> <p data-bbox="181 1214 1108 1428">We note at policy P4 Private Rented Homes that new self-contained, private rented homes in developments providing 100 or more homes must provide the maximum amount of affordable homes with a minimum of 35% subject to viability. The policy goes on to state that where the provision of private rented homes generates a higher development value than a build for sale equivalent, the minimum affordable housing requirement will increase to the</p>	<p data-bbox="1126 1214 2011 1283">Build to rent schemes of 100 or more units will follow the viability tested route.</p>

<p>point where there is no financial benefit to providing private rented homes over build for sale homes.</p> <p>Given that policy P1 Social Rented and Intermediate Housing offers a fast track route for build for sale developments providing 40% affordable housing, we question why >100 unit build to rent schemes providing the same quantum do not also qualify for the fast track route. We consider that a provision for the fast track route in policy P4 will provide flexibility and ensure that the NSP is effective in its delivery.</p>	
<p>Steve Lancashire NSPPSV172.10</p> <p>I have concerns that policy P4 which is in relation to build to rent does not require the same amount of social housing, which is the requirement that it be 17.5% of the development in most circumstances (apart from the Aylesbury Action Core where it should require at least 25% social rented homes).</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>TfL Commercial Development NSPPSV182.6</p> <p>"P4: Private Rented Homes As previously set out within TfL CD's letters of May 2019, February 2018 and September 2017, we reiterate that Policy P4 of the New Southwark Plan should accord with Mayor's SPG Homes for Londoners Affordable Housing and Viability SPG (2017) and Policy H11 of the Intend to Publish London Plan with regard to all matters concerning Build to Rent (BtR) development, including the definition of BtR schemes. Explicitly, TfL CD continue to raise the following concerns: – Southwark Council's adoption of a 100-unit threshold under Policy P4</p>	<p>Comments made to the Proposed Submission version and Amended Policies consultation.</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</p>

deviates from the Intend to Publish London Plan, which stipulates a 50-unit threshold for BtR schemes. We consider that Southwark Council's approach may adversely discourage and/or restrict the delivery of sub-100-unit BtR schemes, potentially reducing delivery and discouraging the involvement of smaller developers and builders.

– TfL CD supports high standards of design. However, there may be a need for some flexibility to reflect BtR schemes, which tend to comprise highly managed homes with shared / communal spaces and facilities.

– The Intend to Publish London Plan requires BtR development to be held under a covenant for at least 15 years. Southwark Council's proposal to establish a minimum covenant of 30 years may dissuade investment in BtR tenure developments.

– In accordance with Para 4.11.10 of the Intend to Publish London Plan, provision of social rented affordable housing in BtR schemes must be justified."

WYG on behalf of John Lyons Charity
NSPPSV 214.3

"Policy P4: Private Rented Homes

The policy, which supports the development of purpose-built private rented accommodation is important and supported by the Charity, however we do have concerns with its proposed wording.

It is widely accepted that the Built-to-Rent (BtR) sector is still considered to be a relatively new, evolving and distinctive sector. We are concerned that Policy P4 as currently drafted would, if it were to become part of the adopted NSP, be detrimental to the future success of this sector in the Borough. The intricacies of the BtR sector require flexibility and it is noticeable that the draft London Plan Intend to Publish version – Policy H11 states that "the affordable housing offer can be solely Discounted Market Rent (DMR) at a genuinely affordable rent, preferably London Living Rent level" and requires "that there is unified ownership and unified management of the private and Discount Market Rent elements of the scheme". Proposed Policy P4 is requiring a level of social rent; and the implications of the likely necessity of

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. 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.

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.

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

The Draft London Plan at Policy H13 sets out that, Boroughs may set their

<p>low cost rent homes being managed by a separate organisation such as Registered Providers with the specific expertise required should not be under-estimated. Most institutional BTR investors are not Registered Providers, and split management reduces management efficiency, in turn affecting the scheme’s investment value and therefore overall profitability. This is an important consideration, as split management negates compliance with draft London Plan H11. The proposed policy should acknowledge and reflect that BtR is a unique sector. Increased flexibility in the policy approach can help deliver more affordable housing both within individual schemes and overall, supporting the BTR’s sector ability to compete for land with build-for-sale development.</p> <p>We support the intention to provide renters with greater tenancy security, and note the six-month break clause, however securing homes for the private rental market for a “minimum 30-year term” is onerous and double the term that is recommend by the Mayor in draft Policy H11 (Intend to Publish) London Plan, and Central Government guidance. We recommend that the figure is reduced to 15 years in accordance with strategic policy, and Central Government guidance."</p>	<p>own local threshold to reflect local housing market circumstances and affordable housing need. 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>Southwark Law Centre NSPPSV167.7</p> <p>P4 Private Rented Homes</p> <p>We are greatly concerned that the policy for build to rent schemes allows a lower level of social housing as a minimum threshold (15% compared to 25%). We do not think this policy has been positively prepared and justified to meet the need in Southwark, which, as policy P1 states, is for social rented housing.</p> <p>We also have great concern about the use of “social rent equivalent” as this is not in line with Southwark Council’s social rent level which is the assessed level of social rent in the borough. If social rent equivalent homes are setting the rent level higher, then they are not truly social rent and should not be treated in the policy as being the same.</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>The social rent equivalent homes will be required to be the same rent levels as social rent homes.</p>

Representation	Officer Response
<p data-bbox="181 248 414 284">P5 Student Homes</p> <p data-bbox="181 288 607 360">HGH Consulting on behalf of Tribe NSPPSV470.3</p> <p data-bbox="181 400 1106 1366"> "Draft Policy P5 (Student homes) Southwark is home to three of London's largest and most successful universities in addition to a host of smaller satellite campuses, comprising over 30,000 higher education students in total. Tribe welcomes a specific student housing policy, acknowledging the key role it has to play in terms of local economic expenditure and in meeting the borough's student housing needs as well as conventional housing needs. However, it is noted that Policy P5 is inconsistent with regional planning policy relating to student housing, and specifically, affordable student housing, as described below. The adopted London Plan does not contain a specific policy on student housing, however, it covers student housing more generally within Policy 3.8 ('Housing Choice') and notably does not require the provision of any affordable housing within student schemes, provided the student accommodation is secured to the use of the land or to its occupation by members of specified educational institutions. The emerging new London Plan (Policy H15 'Purpose-built student accommodation') introduces a requirement for at least 35% of student accommodation to be "affordable student accommodation", as defined through the Mayor's Academic Forum; otherwise, a scheme will be considered under the Mayor's Viability Tested Route. It does not require the provision or any conventional affordable housing and notably discourages boroughs from seeking on-site provision of, or a contribution towards, conventional affordable housing. The emerging NSP (Policy P5), however, requires affordable housing to be provided as part of purpose-built student housing schemes in the following terms: </p>	<p data-bbox="1126 400 2047 536">The requirement for affordable housing in this policy is to address a local acute need of affordable housing in the borough as identified within the Strategic Housing Market Assessment 2019, which would otherwise not be met by only requiring the provision of affordable student accommodation.</p> <p data-bbox="1126 576 2047 895">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 data-bbox="1126 935 2047 1070">Where affordable housing cannot be provided on site (as justified by robust evidence) the sequential approach will be followed, provision of off-site affordable housing and if that cannot be met a payment in lieu will be required.</p>

When providing direct lets at market rent, provide the maximum amount, with a minimum of 35% as conventional affordable housing by habitable room subject to viability, 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 as defined by the Mayor of London; or 3.

When providing student rooms for nominated further and higher education institutions at affordable student rent as defined by the Mayor of London, provide the maximum amount with a minimum of 35% as conventional affordable housing by habitable room subject to viability, as per policy P4.

This clear conflict with London Plan policy is at risk of delivering unintended consequences, including restricting the future delivery of high-quality student housing, of which there is a significant unmet demand in the borough, as evidenced by a recent student demand assessment and market analysis undertaken by Knight Frank on behalf of Tribe. This study concluded that, taking into account the approved student schemes in the borough and pipeline of approximately 5,906 purpose-built student bedrooms, the estimated future full-time student to bed space ratio is 5.1 students per bed space, and thus a substantial shortfall in student housing accommodation. Furthermore, Policy P5 does not recognise the impracticalities of providing student housing alongside conventional affordable housing, particularly on small and constrained sites. It can often lead to gross inefficiencies in the design of schemes, for example, by requiring additional cores to independently service and access the conventional affordable units, which in turn can fetter the viability and delivery of high-quality student accommodation.

In the absence of clear and robust justification for a departure from adopted and emerging regional planning policy, draft Policy P5 is unjustified and unsound in its current drafting and consequently should be amended to align with draft London Plan Policy H15 i.e. require a minimum of 35% affordable student housing."

"Policy P5 Student Homes

LSE wish to comment primarily on the wording of Policy P5. Given the increasingly onerous wording in Policy P5 from that previously consulted upon in P24 of the APV, this representation is responding to the Proposed Changes to the Submitted New Southwark Plan specifically. LSE is deeply concerned that the wording of the policy towards the provision of student housing continues to become more onerous and is not in conformity with the London Plan or Draft London Plan.

An amalgamated version of January 2020 and August 2020 version of Policy P5 states as follows (with changes from APV shown):

Policy P5 Student Homes

Development of purpose-built student housing must:

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

1. Provide 10% of student rooms as easily adaptable for occupation by wheelchair users; and
2. When providing direct lets at market rent, provide the maximum amount with a minimum of 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 as defined by the Mayor of London; or
3. When providing ~~affordable~~ student rooms for nominated further and higher education institutions at affordable student rents as defined by the Mayor of London, provide ~~as much~~ the maximum amount with a minimum of 35% conventional affordable housing subject to viability ~~as viable~~, as per policy P4.

The Reasons included two additional paragraphs

3. Where nomination schemes or schemes developed directly by the

The requirement for affordable housing in this policy is to address a local acute need of affordable housing and family housing in the borough as identified within the Strategic Housing Market Assessment 2019, which would otherwise not be met by only requiring the provision of affordable student accommodation.

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.

Where affordable housing cannot be provided on site (as justified by robust evidence) the sequential approach will be followed, the provision of off-site affordable housing and if that cannot be met a payment in lieu will be required.

Reason 3 provides clarity on Point 3 of Policy P5. Reference to direct lets and nomination schemes is required as direct lets rent levels are usually higher and therefore are required to provide 27% affordable student rents in addition to the affordable housing, subject to viability. Whereas nominations for a particular higher education institute (as stated within your representation) provide rents across all its rooms, which are affordable for students attending the school. The requirement is for nomination schemes or schemes developed directly by the university where the rooms are at affordable rents (as set by the Major) to provide as much conventional

university are providing all of the student rooms at affordable rents they will be required to provide as much conventional affordable housing as viable. Where all of the student rooms are not at affordable rents, they will be required to provide at least 27% of rooms at affordable rents and as much conventional affordable housing as viable.

4. Affordable rents will be set using the Mayor of London's guidance.

The wording of Policy P5 in the Proposed Changes to the Submitted New Southwark Plan requires HEI's to provide a minimum of 35% conventional affordable housing even if all of the student accommodation is affordable. Whilst it states this is subject to viability, the starting point for an HEI is to demonstrate why 35% of the habitable rooms on the site are not being provided as conventional affordable housing. Previously Policy 24 required an HEI to demonstrate what conventional affordable provision was viable. The revised wording sets the bar even higher.

The revised wording seeks to clarify the position where a nominated scheme provides both affordable accommodation and accommodation which does not meet the Mayor's definition of affordable. For HEI's this is the normal situation as a scheme will provide a range of rents for students. Reason 3 however provides confusion as it creates a third position; requiring an HEI to provide 27% affordable rented accommodation and provide as much conventional affordable housing as possible subject to viability. It is considered this is unnecessary and that the policy should differentiate between nominated and non nominated (direct let) schemes.

The 2016 London Plan - Policy 3.8 clearly differentiated between accommodation fixed for students and other hostel style accommodation. Paragraph 3.53C of London Plan Policy 3.8 stated that if accommodation is not robustly secured for students, it will normally be subject to the requirements of affordable housing policy (policies 3.10, 3.11, 3.12 and 3.13).

If a scheme is not nominated to a recognized HEI, then 35% of the accommodation (measured as habitable rooms) should be affordable housing. This means residential homes and not student housing.

The Draft London Plan (ITP) provides significantly more guidance and introduces a clear differentiation between nominated and non nominated

affordable housing as viable.

schemes.

Policy H15 (Purpose Built Student Accommodation (PBSA)) requires that the majority of bedrooms in a development including all affordable student rooms are secured through a nomination agreement for occupation by students of one or more higher education provider. The policy then states that the maximum provision of accommodation should be secured as affordable student accommodation. In order to meet the Fast Track route the London Plan seeks 35% of student accommodation as affordable (or 50% in industrial areas or on public land). Affordability for student housing is set out in Mayor's Housing SPG and is updated annually through the Mayor's Annual Monitoring Report. Currently an affordable rent for a student room is approximately £165/week for a 38 week term.

Although there is no direct definition of a nominations agreement in the London Plan, the Mayor's Housing SPG 2016 describes it as an undertaking between a provider of PBSA and a higher education provider or institution. There is specifically no requirement that a nominations agreement should only be with one HEI.

As noted in paragraph 4.15.14 of the reasons for Policy H15, where a PBSA development meets all the requirements of Part A of Policy H15, boroughs should not require on-site provision of, or a contribution towards, conventional Use Class C3 affordable housing.

Whilst historically Southwark has experienced higher provision of new build student accommodation schemes than most other London boroughs, this is no longer the case and so there would appear no reason why the NSP should not be in general conformity with the adopted and emerging London Plan.

This point sits centrally with LSE's case to representations to the New Southwark Plan. Southwark is an important location for LSE given the proximity to the main LSE campus at Aldwych and the relative affordability of sites in the borough in comparison to boroughs such as Westminster and Camden make it an important opportunity to provide rooms for its students. LSE already has three sites in use as student housing, including approximately 600 beds at Bankside House Sumner Street SE1 next to Tate Modern. LSE has considered the opportunity to redevelop Bankside House to provide more

beds for its students. The current wording of Policy P5 would place future development opportunities at risk.

One of the key aims of LSE is the provision of genuinely affordable student housing (i.e. through the provision of 35% GLA affordable rents) which directly assists in widening access to Higher Education for underrepresented groups. This is one of LSE's key objectives as a University and its position as a Russell Group institution with an international profile places an extra responsibility on the School. LSE currently has a shortfall of 2800 beds for its students and whilst the current crisis will affect lettings for a short period in the long term it is expected that this shortfall will increase.

In order to comply in the future with Policy P5 an HEI such as LSE would need to provide at least 27% of rooms within its schemes as affordable student housing (LSE would normally provide at least 35%) and then undertake detailed viability assessments to assess if on site affordable housing could be provided. If on site affordable housing was not possible to be provided due to viability, LSE would then need to assess if an off-site location elsewhere in the borough was available and finally assess if a financial contribution towards the Council's affordable housing fund was possible.

This viability test would introduce significant risk in terms of the cost, programme and the design. Higher education institutions (HEI's) cannot accept this level of risk and would not be able to compete for sites either with housing developers or direct let providers, who can compensate for greater cost through higher rents. LSE is committed to delivering rents across all its rooms which are affordable for students attending the school.

We append the Committee Report for a recent scheme in Southwark which LSE is developing at Glengall Road, in Old Kent Road SE16. This scheme which delivers 676 student rooms was determined under the current Core Strategy and Southwark Plan policies. Paragraph 97 and 98 of the Committee Report confirm officers' views that the provision of residential and student housing in development schemes do not mix.

97. It is not appropriate for conventional affordable housing (Class C3) to be mixed with a student housing scheme, in particular, on a site designed to keep the access to the accommodation separate from the remainder of the

site. It is restricted to ensure the students are safe. The inclusion of conventional affordable housing on this scheme would require an additional core to independently service and access the affordable units, separate to the secure entrance serving the student accommodation.

Paragraph 100 confirms the London Plan and Draft London Plan do not require residential affordable housing with student housing schemes which provide affordable bed in nominated schemes.

Paragraph 101 confirms that 35% affordable student housing meets Draft London Plan Policy H15.

Table 1 below Paragraph 107 sets out the difference in rents between nominated schemes and direct let schemes with rents in the direct let sector rising to over £500/week in the borough. Despite an £8.17million deficiency LSE continued to provide 35% of accommodation as affordable student beds and agreed to provide a £1.2million contribution as they were aware that Planning Committee members were unhappy that no residential affordable housing was being provided. If the scheme had been determined in line with the guidance set out in the Council's Draft Affordable Housing SPD 2011 (£100k/habitable room) a contribution of £23.66million pounds would have been payable (35% of 676 multiplied by £100,000). If Policy P5 was adopted as currently worded, this sum is the size of financial impact that an HEI would have to consider when seeking to secure sites.

The increasing prescription in Policy P5 from Policy P24 in the NSP APV and from Policy 8 of the Core Strategy will mean LSE and other HEI's will find it increasingly difficult to compete for or develop sites in the borough or developer their existing stock to secure more student homes. We have set out in Appendix 1 suggested wording for Policy P5 which reflects the wording of Policy H15 of the DLP ITP. This wording will ensure schemes delivering nominated student homes provide a minimum of 35% of the rooms as affordable in accordance with the rents set out by the Mayor of London and ensure consistency (and conformity) with the London Plan. We consider Reason 3 should be deleted as it is unnecessary if the revised wording for Policy P5 is inserted."

"DRAFT POLICY P5 'STUDENT HOMES'

Draft Local Plan Policy P5 'Student Homes' has been subject to a number of changes. The policy now states that PBSA developments must:

1. Provide 10% of student rooms as easily adaptable for occupation by wheelchair users; and
2. When providing direct lets at market rent, provide the maximum amount, with a minimum of 35% as conventional affordable housing by habitable room subject to viability, 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 as defined by the Mayor of London; or
3. When providing student rooms for nominated further and higher education institutions at affordable student rent as defined by the Mayor of London, provide the maximum amount with a minimum of 35% as conventional affordable housing by habitable room subject to viability, as per policy P4."

The below recommendations are made to parts 1, 2 and 3 of draft policy P5, as well reason 5 of the justifying text.

Part 1 – Accessible and Adaptable Rooms

Tribe object to the 10% requirement for adaptable rooms for the following reasons:

1. The 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%
2. The majority of wheelchair students are housed by the universities close to campus for ease of travel;
3. The 10% requirement was introduced in order to help meet a shortfall in wheelchair accessible housing within conventional housing. Generally, those who live in conventional dwellings are of an older demographic thus the percentage of those who have a disability and require wheelchair accessibility is far greater than the demographic affiliated with student

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

The requirement for affordable housing in this policy is to address a local acute need of affordable housing and family housing in the borough as identified within the Strategic Housing Market Assessment 2019, which would otherwise not be met by only requiring the provision of affordable student accommodation.

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.

Where affordable housing cannot be provided on site (as justified by robust evidence) the sequential approach will be followed, the provision of off-site affordable housing and if that cannot be met a payment in lieu will be required.

Co-living will be assessed similarly to student schemes under Policy P5. As noted in the supporting text to Policy P5, where the requirement for affordable housing can be exceeded, this will be conventional affordable housing rather than affordable student housing.

accommodation. The normal age range of students is between 18 and 25, explaining why there has never been a shortfall in wheelchair provision within student housing; and

4. Direct liaison between applicants and Higher Education Institutions (HEI) should occur and in order to tailor needs relevant to the HEI nominated to occupy each institution.

Given the above, it is not considered necessary to over provide on wheelchair accessible units which will not be used. Indeed, these units are required to be larger and thus an over-provision will unnecessarily reduce the number of student bedrooms able to be delivered within a scheme. This will in turn reduce the level of contribution a proposal can make towards housing supply.

Recommendation: Based on the evidence above it is considered that the 10% requirement for adaptable rooms should be reduced to a target based upon the needs of individual HEIs.

Part 2 and 3 – Affordable Contributions and Affordable Student Rent

Tribe raise objection to the requirements of parts 2 and 3 of the policy for the following reasons:

1. The overarching approach of draft policy P5 is in direct conflict with the approach of draft London Plan 'Intend to Publish' Version (the draft London Plan), as set out in draft policy H15, which is considered by the GLA to carry weight, for the following reasons:

a. Regardless of whether rooms are provided for via nominations agreement, Draft policy H5 requires a minimum of 35% conventional affordable housing in addition to affordable student rents. This is clearly in conflict with supporting paragraph 4.15.14 of draft London Plan policy H15 which is explicit that where PBSA provides a policy compliant level of affordable student rent, "boroughs should not require on-site provision of, or a contribution towards, conventional Use Class C3 affordable housing";

b. For direct let student rooms, draft policy H5 requires 27% of the student bedrooms to be let at affordable student rent. This is in addition to the 35% conventional affordable housing requirement. This approach is in conflict to draft policy H15 of the draft London Plan which requires the majority of

rooms, including all of the affordable rent rooms, within a student development to be subject to a nominations agreement with a minimum of 35% provided at affordable student rent;

c. For rooms let via nominations agreement, draft policy P5 requires all rooms to be let at affordable student rent. This is in addition to the 35% conventional affordable housing requirement. This approach is in direct conflict with draft policy H15 of the draft London Plan which requires only at least 35% (50% on public land) to be delivered as affordable student rent, and only where this is not met should the maximum amount be provided as determined via viability testing;

d. Reasons 1 and 2 of the supporting reasons for the policy set out a justification for the Council's approach to PBSA, particularly with regards to the requirement for conventional affordable housing, stating that allowing too much student accommodation will restrict the delivery of family and affordable housing. However, this is contradictory to the draft London Plan which acknowledges that new flats, houses or bedrooms in PBSA all contribute to meeting London's housing need. The completion of new PBSA therefore contributes to meeting London's overall housing need, and is not in addition to this need;

2. Notwithstanding the conflicts with regional policy outlined above, this approach will significantly hinder the viability and deliverability of student schemes. The requirement for 35% affordable housing, which is not compliant with the draft London Plan, in addition to a requirement for a level of affordable student rent beyond that of the level required by the London Plan, will undoubtedly have an effect on the viability of schemes. This should be further considered in the context of borough and mayoral CIL contributions which student schemes are also subject to;

3. The hindered viability of student schemes and the subsequent effect on their deliverability will have numerous knock-on effects. Firstly, in accordance with the NPPF and draft London Plan which set out that PBSA contribute to overall housing, a hinderance on the delivery of student housing is equally a hinderance on the delivery of housing as a whole. Notwithstanding this, a lack of student accommodation, and particularly

affordable student accommodation, will place additional pressure on family housing as students will be forced to occupy bedspaces within conventional dwellings. Increased delivery of PBSA in fact relieves pressure on family housing, which the Council itself notes is a typology highly needed across the borough.

Recommendation: Parts 2 and 3 of draft policy P5 should be updated to reflect the draft London Plan position. The requirement for conventional affordable housing is in clear conflict with regional policy and should be removed. Additionally, requirements for affordable student rent should be revised in accordance with the draft London Plan."

"CONTNUED ABOVE

Reason 5 of the policy justification – Co-Living

Reason no. 5 given as justification for policy P5 states the following:

"Development proposals for 'co-living' will be considered in the same way as direct let student accommodation and similarly trigger a requirement for self-contained affordable housing for 35% affordable housing. However, where this requirement can be exceeded additional affordable housing will be conventional affordable housing rather than affordable student rooms."

Tribe object to this on the following basis:

1. Co-living is a form of purpose-built shared living targeted largely at young professionals but available for all types of occupier. It is not a form of accommodation intended to be occupied by students alone. On this basis, co-living developments should not be assessed on the basis of draft policy P5 which applies specifically to PBSA;
2. The above is evidenced by the draft London Plan, whereby draft policy H16 of this plan sets out a series of policy requirements for co-living which are entirely separate from PBSA considerations;
3. In any case, the requirement for at least 35% affordable housing as part of co-living developments, which would be required by draft policy H5, is in fact in conflict with draft policy H16 of the London Plan. Draft policy H16 requires a contribution (payment in lieu) towards affordable housing equivalent to 35% of the co-living units – it does not require the delivery of 35% affordable

<p>housing. Recommendation: Reason 5 of the justification for policy P5 should therefore be removed. A separate policy should be added which applies to purpose built shared living (co-living), as per the draft London Plan. In addition, the requirement for at least 35% affordable housing should be revisited in the context of draft London Plan policy H16, which requires a contribution equivalent to this value only."</p>	
<p>GLA NSPPSV66.4</p> <p>The Mayor objects to this policy as amended requiring a minimum of 35% as conventional affordable housing by habitable room. Policy H15 Purpose-built student accommodation seeks 35% of the accommodation to be secured as affordable student accommodation. Student housing frees up conventional housing and as such the requirement to provide affordable student accommodation is sufficient.</p>	<p>Policy P5 requires the provision of affordable housing and affordable student rooms within developments for student housing.</p> <p>The requirement for affordable housing in this policy is to address a local acute need of affordable housing and family housing in the borough as identified within the Strategic Housing Market Assessment 2019, 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>ROK Planning on behalf of Unite Group Plc NSPPSV198</p> <p>"1. The requirements for conventional residential accommodation should not</p>	<p>Student wheelchair users should be offered a range of options in their choice</p>

be applied to student housing as in reality, the typical demand from students per annum falls significantly below the 10% mark. This is a steady and consistent trend as evidenced by Unite's longer term experience;

2. Indeed, Unite have over 117 PBSA properties across the UK with 27 buildings in the London portfolio. Of these c.9,500 bedrooms, they have provision for 528 students that may need a wheelchair room. This is over 5.5% of the total London rooms. Over the last 5 years, Unite have provided 41 students with these rooms. For the previous academic year, Unite had 7 students in need of wheelchair sized rooms out of an approximate total of c.9500 bedrooms. This equates to a 0.07% take up and thus demonstrates the exceptionally low need for accessible bedrooms;

3. The majority of wheelchair students are housed by the universities close to campus for ease of travel;

4. The 10% requirement was introduced in order to help meet a shortfall in wheelchair accessible housing within conventional housing. Generally, those who live in conventional dwellings are of an older demographic thus the percentage of those who have a disability and require wheelchair

accessibility is far greater than the demographic affiliated with student accommodation. The normal age range of students is between 18 and 25, explaining why there has never been a shortfall in wheelchair provision within student housing; and

5. Unite operate a policy of meeting the needs of an individual user and not applying a one size fits all policy. Indeed, should individual bedrooms need to be adapted; this can be done quickly and relatively easily to meet requirements. Unite have undertaken such additional alterations in discussion with the end user and provided a bespoke solution to a student's needs.

Given the above, it is not considered necessary to over provide on wheelchair accessible units which will not be used. Indeed, these units are required to be larger and thus an over-provision will unnecessarily reduce the number of student bedrooms able to be delivered within a scheme. This will in turn reduce the level of contribution a proposal can make towards housing

of student accommodation, thus it is important there is a reasonable provision of this form of accommodation in PBSA schemes.

The requirement for affordable housing in this policy is to address a local acute need of affordable housing and family housing in the borough as identified within the Strategic Housing Market Assessment 2019, which would otherwise not be met by only requiring the provision of affordable student accommodation.

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.

Where affordable housing cannot be provided on site (as justified by robust evidence) the sequential approach will be followed, the provision of off-site affordable housing and if that cannot be met a payment in lieu will be required.

Co-living will be assessed similarly to student schemes under Policy P5. As noted in the supporting text to Policy P5, where the requirement for affordable housing can be exceeded, this will be conventional affordable housing rather than affordable student housing.

supply. Recommendation: Based on the evidence above it is considered that the 10% requirement for adaptable rooms should be reduced to 5%."

"The overarching approach of draft policy P5 is in direct conflict with the approach of draft London Plan 'Intend to Publish' Version (the draft London Plan), as set out in draft policy H15, which is considered by the GLA to carry weight, for the following reasons:

- a. Regardless of whether rooms are provided for via nominations agreement, Draft policy H5 requires a minimum of 35% conventional affordable housing in addition to affordable student rents. This is clearly in conflict with draft policy H15 of the draft London Plan which is explicit that where PBSA provides a policy compliant level of affordable student rent, "boroughs should not require on-site provision of, or a contribution towards, conventional Use Class C3 affordable housing";
- b. For direct let student rooms, draft policy H5 requires 27% of the student bedrooms to be let at affordable student rent. This is in addition to the 35% conventional affordable housing requirement. This approach is in conflict to draft policy H15 of the draft London Plan which requires the majority of rooms, including all of the affordable rent rooms, within a student development to be subject to a nominations agreement with a minimum of 35% provided at affordable student rent;
- c. For rooms let via nominations agreement, draft policy P5 requires all rooms to be let at affordable student rent. This is in addition to the 35% conventional affordable housing requirement. This approach is in direct conflict with draft policy H15 of the draft London Plan which requires only at least 35% (50% on public land) to be delivered as affordable student rent, and only where this is not met should the maximum amount be provided as determined via viability testing;
- d. Reasons 1 and 2 of the supporting reasons for the policy set out a justification for the Council's approach to PBSA, particularly with regards to the requirement for conventional affordable housing, stating that allowing too much student accommodation will restrict the delivery of family and affordable housing. However, this is contradictory to the draft London Plan

which acknowledges that new flats, houses or bedrooms in PBSA all contribute to meeting London's housing need. The completion of new PBSA therefore contributes to meeting London's overall housing need, and is not in addition to this need;

2. Notwithstanding the conflicts with regional policy outlined above, this approach will significantly hinder the viability and deliverability of student schemes. The requirement for 35% affordable housing, which is not compliant with the draft London Plan, in addition to a requirement for a level of affordable student rent beyond that of the level required by the London Plan, will undoubtedly have an effect on the viability of schemes. This should be further considered in the context of borough and mayoral CIL contributions which student schemes are also subject to;

3. The hindered viability of student schemes and the subsequent effect on their deliverability will have numerous knock-on effects. Firstly, in accordance with the NPPF and draft London Plan which set out that PBSA contribute to overall housing, a hinderance on the delivery of student housing is equally a hinderance on the delivery of housing as a whole. Notwithstanding this, a lack of student accommodation, and particularly affordable student accommodation, will place additional pressure on family housing as students will be forced to occupy conventional dwellings. Increased delivery of PBSA in fact relieves pressure on family housing, which the Council itself notes is a typology highly needed across the borough. Recommendation: Parts 2 and 3 of draft policy P5 should be updated to reflect the draft London Plan position. The requirement for conventional affordable housing is in clear conflict with regional policy and should be removed. Additionally, requirements for affordable student rent should be revised in accordance with the draft London Plan."

Co-living is a form of purpose-built shared living targeted largely at young professionals but available for all types of occupier. It is not a form of accommodation intended to be occupied by students alone. On this basis, co-living developments should not be assessed on the basis of draft policy P5 which applies specifically to PBSA;

2. The above is evidenced by the draft London Plan, whereby draft policy H16 of this plan sets out a series of policy requirements for co-living which are entirely separate from PBSA considerations;

3. In any case, the requirement for at least 35% affordable housing as part of co-living developments, which would be required by draft policy H5, is in fact in conflict with draft policy H16 of the London Plan. Draft policy H16 requires a contribution (payment in lieu) towards affordable housing equivalent to 35% of the co-living units – it does not require the delivery of 35% affordable housing.

Recommendation: Reason 5 of the justification for policy P5 should be removed. A separate policy should be added which applies to purpose built shared living (co-living), as per the draft London Plan. In addition, the requirement for at least 35% affordable housing should be revisited in the context of draft London Plan policy H16, which requires a contribution equivalent to this value only.

Representation	Officer Response
<p data-bbox="188 317 524 347">P6 Housing for older people</p> <p data-bbox="188 357 465 421">Southwark Law Centre NSPPSV167.8</p> <p data-bbox="188 501 1099 804">"P6 Housing for Older People We are concerned that there is not a clear allocation of potential sites for specialist care housing and nursing care housing across the borough, and we support the submissions made by Southwark Pensioner Action Group in this regard. There appears to be a concentration of this provision in the North of the borough and in the central section of the borough, but not spread out to effectively meet the need across the borough. "</p>	<p data-bbox="1140 501 2065 852">The Southwark Housing Strategy to 2043 (and is being updated) aims to meet the needs of the older people through a number of ways, including working with partners including health, housing and voluntary organisations to provide quality and affordable age friendly housing across the borough, and to deliver sustainable solutions to address specialist housing needs. We are committed to finding solutions to deliver and adapt properties to enable older residents and people with disabilities to live independently as long as possible in their communities. As such, the NSP does not include a fixed target for specialist housing but the policy is clear that provision will be accepted where there is a demonstrated need.</p>
<p data-bbox="188 900 353 963">Sally Lynes NSPPSV506.1</p> <p data-bbox="188 1005 1099 1428">Legally compliant in accordance with the Town & Country Planning (Local Planning) (England)(Amendment) Regulations 2012? Yes Do you consider this policy sound? No Do you consider this policy is sound? - why not sound - Effective With the population ageing in Southwark from 2019, there is a need for housing for all older people as well as specialist housing adapted for wheelchairs and extra care housing. For a small minority, there is a need for residential accommodation of a high standard. Two new Nursing Homes are proposed in Southwark. The Home replacing Burgess Park is now being built but it is well behind schedule. The other Home planned for D'Eynesford Road have not started. I have not found any reference to these Homes in the Plan and plans for Adult Social Care are</p>	<p data-bbox="1140 999 2065 1350">The Southwark Housing Strategy to 2043 (and is being updated) aims to meet the needs of the older people through a number of ways, including working with partners including health, housing and voluntary organisations to provide quality and affordable age friendly housing across the borough, and to deliver sustainable solutions to address specialist housing needs. We are committed to finding solutions to deliver and adapt properties to enable older residents and people with disabilities to live independently as long as possible in their communities. As such, the NSP does not include a fixed target for specialist housing but the policy is clear that provision will be accepted where there is a demonstrated need.</p>

notably absent.

Please make a clearer commitment to build a stated number of units of different kinds by specific dates in the New Southwark Plan. The types of housing should include:

- a) Low rise, accessible housing suitable for older people in an ageing population
- b) Extra care, wheelchair adapted accommodation
- c) Good quality residential Care and Nursing Homes for those who cannot remain in the community

Representation	Officer Response
<p>P7 Wheelchair accessible and adaptable housing</p>	
<p>NHS London Healthy Urban Development Unit NSPPSV482.2</p> <p>The policy is now entitled “Wheelchair accessible and adaptable housing” however, given the previous reason for the policy included ‘a need for alternative types of specialist housing which meet the needs of people with disabilities that are not met by wheelchair accessible housing’ then a policy addressing this identified need should be incorporated within the New Southwark Plan.</p> <p>The current wording reads “The council recognises that a range of different types of specialist housing is required to meet the needs of people with disabilities; this includes, but is not limited to, people with ambulatory difficulties, blindness, learning difficulties, autism and mental health needs. Accordingly, developers should work with the council, registered providers or other relevant partners to identify and provide for a range of specialist housing needs where appropriate.”</p> <p>Clause 7 states “ Provide alternative specialist housing to meet specific needs in place of an affordable wheelchair user home where the council has identified a specialist housing need; and..” It is unclear why it is “in place of an affordable wheelchair user home”. Based on the evidence there should be a policy which requires developers to provide specialist housing to meet need, and a policy to ensure this is provided in appropriate locations.</p> <p>We propose that there should be significant changes to the policy to require specialist housing to meet identified need including wheelchair accessible and adaptable housing, or an additional policy ‘Specialist housing’. This could refer to the other characteristics of appropriate housing which may include location, for example close to town centres to be accessible to services and facilities. This would ensure conformity with The Intent to Publish London Plan – we draw attention particularly to para 1.4.2 and GG4 Delivery the homes Londoners need.</p>	<p>The policy seeks to address the unmet need.</p> <p>The policy requires developers to work with the council, registered providers or other relevant partners to identify and provide for a range of specialist housing needs where appropriate.</p>

Para 1.4.2”The failure to provide sufficient numbers of new homes to meet London’s need for affordable, market and specialist housing has given rise to a range of negative social, economic and environmental consequences, including: worsening housing affordability issues, overcrowding, reduced labour market mobility, staff retention issues and longer commuting patterns.

(Strategic Objective) GG4 Delivering the homes Londoners need To create a housing market that works better for all Londoners, those involved in planning and development must: A ensure that more homes are delivered B support the delivery of the strategic target of 50 per cent of all new homes being genuinely affordable C create mixed and inclusive communities, with good quality homes that meet high standards of design and provide for identified needs, including for specialist housing”

Representation	Officer Response
<p data-bbox="188 1153 600 1182">P9 Supported housing and hostels</p> <p data-bbox="188 1193 757 1257">NHS London Healthy Urban Development Unit NSPPSV482.3</p> <p data-bbox="188 1297 882 1326">We support the addition of 'supported housing' to clause 2.</p>	<p data-bbox="1140 1297 1227 1326">Noted.</p>

Representation	Officer Response
P10 Self and custom build	
<p data-bbox="159 280 360 352">Living Bankside NSPPSV239.11</p> <p data-bbox="159 392 1088 496">"Self and Custom Build Community led housing should be included in this policy with a commitment of support from Southwark Council."</p>	<p data-bbox="1108 392 2029 456">Community land trusts are recognised and supported within the Fact Box of Policy P1 (social rented and intermediate housing).</p>