



## Transport for London Commercial Development – Written Statement on Matter 5: Planning for The Economic Prosperity of The Borough Including Employment Sites and Town and Local Centres

### New Southwark Plan Examination

Thank you for providing the opportunity to engage with the New Southwark Plan Examination. The comments below are the views of the Transport for London Commercial Development (TfL CD) planning team in its capacity as a landowner in the borough only. These are separate from any representations made by TfL in its statutory planning role and / or as the strategic transport authority for London.

#### **Issue 1**

*5.22 Is the policy overall justified, effective and consistent with national policy and the London Plan? Is it viable? Is it sufficiently flexible?*

TfL CD note the Council's response to our previous comments raised. However, it is considered that the following points are still relevant and have not been addressed:

The implications for public sector and other developer-occupiers has not been considered. For example, TfL may use land it owns to build offices to serve its transport functions. TfL CD consider that this policy should be aligned with Policy E3 of the Publication London Plan which states that obligations should only be used to secure affordable workspace for specific social, cultural or economic purposes which are set out in part A of the policy. Flexibility or an exceptions test should be incorporated in this policy, which reflects the flexibility of the approach set out in the publication London Plan.

Furthermore, we do not believe that the evidence base document "Housing and Affordable Workspace policies further viability sensitivity testing" (July 2019) recommendation for "suitable flexibility to ensure that appropriate development, providing a suitable mix of uses to support the identified needs of the LBS comes forward" (paragraph 4.15) has been reflected in the policy. Policy E2 Part D of the Publication London Plan indicates a threshold



of 2,500sqm compared to the 500sqm which is suggested in the policy. The 500sqm set out in the policy is considered overly onerous and should be aligned more with the London Plan.

The policy should contain flexibility to enable schemes to provide under 10% where they are providing a high level of discount to market rents. This will provide quality affordable workspace which meets the demands of smaller businesses in the borough who have the most need for affordable workspace as part of development schemes. Such an approach to use a sliding scale has recently been adopted by other London Boroughs.