



The New Southwark Plan: New and Amended Policies

Consultation Report

June 2017

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1. Introduction

1.1 What is the New Southwark Plan?

The New Southwark Plan is a borough-wide planning policy document which will guide regeneration and development in Southwark. It is therefore essential that the plan is developed in meaningful consultation with key stakeholders, such as residents, community groups, workers, landowners and developers, which have an interest in the future of the borough.

The document, which is being developed over a three year period, will replace the Core Strategy (2011) and saved Southwark Plan (2007) policies. The plan will enable the borough to deliver the homes and jobs which are needed to make the borough a better and more sustainable place to live and work. It is a regeneration strategy for Southwark and will be used to make decisions on planning applications.

1.2 What is this consultation report?

The purpose of this report is to summarise the consultation responses the Council received and took into consideration when preparing our new policies and significant amendments to previously proposed policies. These policies are also 'preferred option' stage policies. These policies have been prepared following consultation responses and in response to changes in national planning policy.

At each stage of consultation we carry out activities in accordance with our Statement of Community Involvement (SCI) (2008). The SCI sets out how the council will consult on all of our planning policy documents. The SCI refers to a number of legal and regulatory requirements, both in terms of methods of consultation and also particular bodies that we must engage with, and sets out how we meet these requirements. When the SCI was produced it was done so with regard to the Town and Country Planning (Local Development) (England) Regulations 2004 and the Town and Country Planning (Local Development) (England) (Amendment) Regulations 2008. In April 2012, both sets of regulations were replaced by the Town and Country Planning (Local Planning) (England) Regulations 2012. Consultation and procedure has been carried out in accordance with the revised Regulations.

The Localism Act 2011 introduced the "duty to co-operate", which requires us to engage with a range of bodies on an ongoing basis as part of the production of planning policy documents. Much of the process that is required by the duty is already covered in our SCI and has been an integral part of the preparation of new planning policy in the borough. We will ensure that we meet the requirements of the duty to co-operate at every stage of consultation. This will involve writing to and where appropriate meeting and working with our neighbouring boroughs, the Greater London Authority and other prescribed bodies such as Historic England and Transport for London.

The Council seeks the views of the full range of statutory and non-statutory stakeholders at each formal stage of consultation.

2. Stages of Consultation

2.1 What stages of consultation have been completed so far?

This document explains the consultation that has been undertaken in preparation of the New Southwark Plan Preferred Option Part 2 (Site Allocations and Area Visions) Document. To date the Council has undertaken the following stages of consultation to inform the formulation of draft Local Plan policies.

Timeline for the New Southwark Plan

Let's talk about your high streets	Informal consultation took place between October 2013 and February 2014
New Southwark Plan Options (Draft Policies and Area Visions) (2014)	Consultation took place between 31 October 2014 and 6 March 2015.
New Southwark Plan Preferred Option Part 1: Policies	Consultation took place between October 2015 and February 2016
New Southwark Plan Preferred Option Part 2: Site Allocations and Area Visions	Informal consultation took place throughout 2016 where draft visions for each area that were consulted on previously were placed on the council's website and comments invited on areas and vision content. In November 2016 the council circulated a reminder email to the policy consultation list inviting any further representations in preparation for the drafting of the visions and site allocations. Officers attended key stakeholder groups in visions areas to discuss the content of visions. Formal consultation to take place on this document 6 February 2017 to 28 April 2017.
New Southwark Plan: New and Amended Preferred Option Policies Consultation	21 st June to 13 th September 2017
New Southwark Plan Proposed Submission Version	2017
Public examination	2018
Adoption	2018

The first stage of consultation, 'Let's talk about your high streets' was a very informal initial stage of consultation to get people thinking about their high streets and what they want from them. This consultation helped shape area visions and planning policies for the New Southwark Plan Options Document.

The New Southwark Plan Options version included draft visions for Aylesbury, Bankside, Bermondsey and the Blue, Blackfriars Road, Camberwell, Canada Water, Dulwich, Elephant and Castle, Herne Hill, London Bridge, Old Kent Road, Nunhead, Peckham and Tower Bridge Road. The Options version also set out initial proposed site allocations and policies and an implementation plan for seven main planning and regeneration topics.

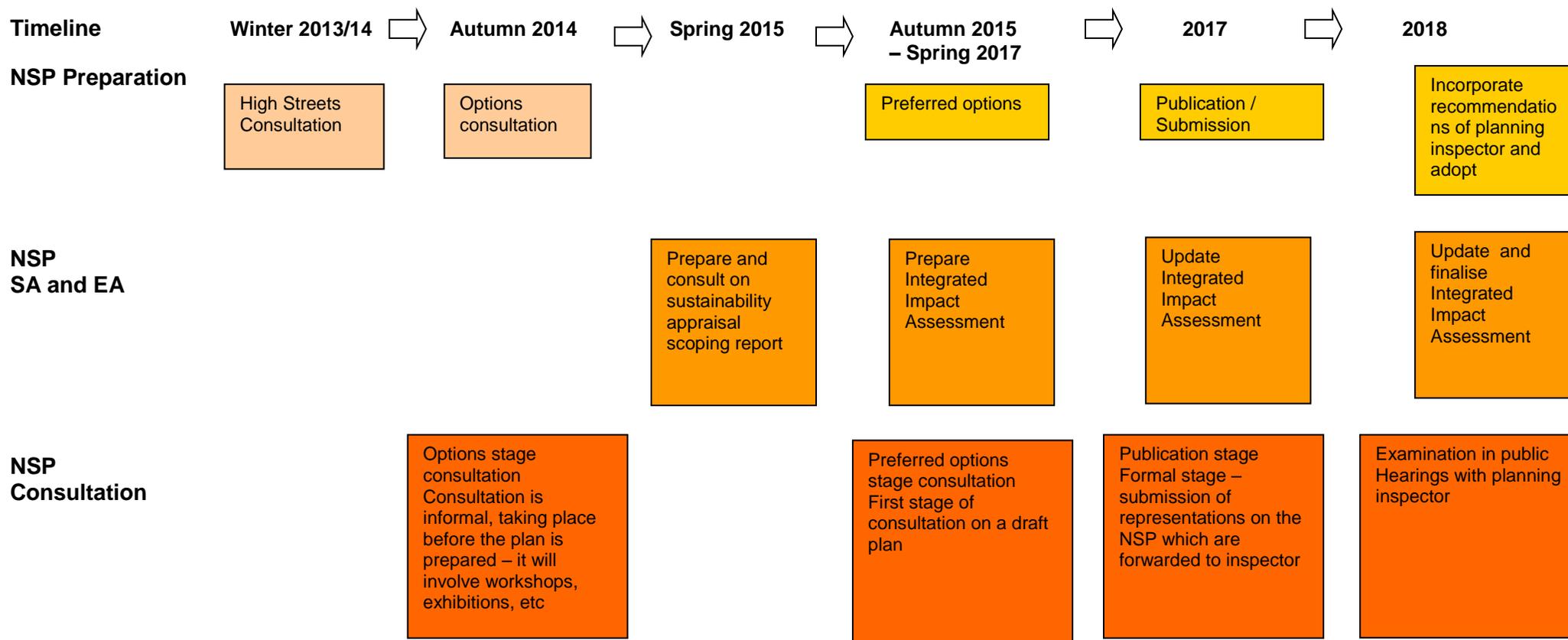
The New Southwark Plan Preferred Option Part 1 (Policies) took into account representations received in response to the Options consultation in order to develop the preferred option for development management policies and regeneration strategy for Southwark.

The New Southwark Plan Preferred Option Part 2 (Sites Allocations and Area Visions) develops the site allocations and visions taking into account consultation on the Options and Preferred Options Part 1 versions. Informal consultation took place to ensure stakeholders could participate in the development of the visions and site allocations before they were formally drafted.

This report identifies how the representations received by the Council during consultation of The New Southwark Plan Preferred Option Part 1 (Policies) have been taken into account and influenced the preparation of the new and amended policies proposed during this latest stage of consultation.

The diagram overleaf provides an overview of the stages involved in preparing the New Southwark Plan and the consultation involved at each stage. It shows the consultation stages that have been completed and the next stages of development of the plan.

Diagram 1: Stage of NSP preparation and consultation



2.2 What happens next?

In advance of the Proposed Submission version of the New Southwark Plan the Council is carrying out this interim stage of consultation to seek the views of the full range of statutory and non-statutory stakeholders on these draft policies. This will provide the Council with an opportunity to review comments and consider any further changes which will feed into the proposed submission version.

Stakeholders are requested to submit full and detailed comments, if necessary these should be backed up by evidence, to justify any support or opposition for the draft policy proposals. Additionally the Council welcomes participants to identify any policy areas which have been omitted or are otherwise absent.

We have previously consulted on a preferred option for our strategic policies, development management policies, area visions and site allocations to guide future development across the borough. This document sets out new 'preferred option' policies alongside significantly amended policies. These new and revised policies have been prepared in response to the previous consultation and to reflect changes in national and regional planning policy. This consultation ensures all our residents and visitors have an opportunity to consult on all our emerging policies before the formal 'proposed submission' stage of consultation towards the end of 2017.

We will then consult on a **Proposed Submission version** of the New Southwark Plan in Autumn/Winter 2017. The policies, site allocations and visions in this version of the New Southwark Plan will be very close to the actual policies which will form the plan. It will only be changed if there are legal reasons as this is a formal stage of consultation. There may need to be another round of consultation depending on any changes to national and regional policy. The Council will then make any final amendments in light of this consultation and submit the New Southwark Plan to the Secretary of State for a public examination by a planning inspector. Participants of the final stage of consultation have the right to represent themselves at the public examination.

The inspector will prepare a report for the Council and may require changes to be made to the plan. The final New Southwark Plan will then be adopted by the Council. This is a decision taken by all Councillors at the Council Assembly.

2.3 Ongoing Consultation

The Council is also in the process of consulting on new preferred option policies and site allocations in advance of the preparation of the proposed submission version of the New Southwark Plan. These new policies and allocations are being proposed as a result of representations received during the consultation process or to respond to central government legislation or trends recognised by the Council which these new policies seek to address.

A new area vision has been proposed for Crystal Palace and Gipsy Hill in order to recognise the distinct character of this area compared to Dulwich, so as to respond more appropriately to the areas needs and provide more specific guidance.

Alongside this, we have also outlined amendments to 2 existing site allocations, as detailed below:

- **NSP06: Land bounded by Southwark Street, Redcross Way and Crossbones Graveyard (Landmark Court)** – Indicative capacity for the site identified a residential uses as required uses. This was an error and the site is now proposed to be allocated as an employment led site.
- **NSP38: Dulwich Hamlet Champion Hill Stadium, Dog Kennel Hill** – Site boundary was amended during the preparation of the document. Site area incorrectly displayed the measurements for the superseded site boundary. This has now been rectified to display the correct site area.

3. Summary of the consultation

3.1 Methods of consultation

All consultation has taken place in accordance with the Council's Statement of Community Involvement. A range of consultation methods were used including mail outs, newspaper advertisements and stakeholder meetings and workshops.

3.2 Summary of representations made and how these have been taken into account

The tables below provide summaries of the representations made towards each of the policies we are proposing to amend, specifically those representations which are related to each of the proposed policy amendments and have been taken into consideration when making our revisions. It is important to note that this is not an extensive list of all representations we received related to each the policies we are proposing to amend. As stated, only representations which relate to the Council's proposed amendment to the respective policy are detailed alongside an officer response which explains why we have agreed with the expressed position, or for some cases seeks to justify why we have taken a different approach. Where relevant the response provides details of how representations were taken into account in developing the proposed policy amendments.

DM1 – Affordable Homes

Summary	Council response
Definition of Affordability	
<p>Affordability needs to be more clearly defined: the Government's views and those of The Mayor do not represent true affordability and for Southwark the focus needs to be based on affordability of social housing, as anything else is not socially sustainable.</p>	<p>The Council's Strategic Housing Market Assessment demonstrates that there is a diverse affordable housing need across Southwark. Households on the lowest incomes often require social housing to adequately meet their needs whereas middle income households can afford to spend a greater proportion of their income on housing costs and so a range of intermediate housing products can better meet this need. The proposed policy amendment seeks to address this varied housing need and will ensure a wider range of affordable housing products are provided to benefit all groups.</p>
<p>Support the Council's opposition to the Government's 'affordable rent' homes. These are unaffordable to people on middle and low incomes. Local people now have to move out of the borough when they have made their lives here, just because they can't afford the sale prices and private sector rent levels.</p>	<p>The proposed policy amendment proposes a broader variety of intermediate affordable housing products to better address the needs of a wider range of Southwark's residents. In 2016 The Mayor of London introduced a capped affordable rent product called London Affordable Rent (LAR) which matches the social rent caps set out in the HCA Rent Standard Guidance rent formula. By introducing this new housing product, the Council hopes to be able to deliver above the current affordable housing requirement to 40% and accordingly, substantially more affordable homes.</p>
<p>New development will be overwhelmingly targeted towards people who are in a position to buy the homes (65%). Only a small minority of Southwark residents are in a position to buy even the cheapest new homes or to pay current market rents or so-called 'affordable' rents (80% of the market rate), therefore the majority of the housing units provided are not going to go to local people.</p>	<p>The proposed policy amendment will support developments proposing either a minimum 25% social rent homes, or a minimum 30% for developments proposing London Affordable Rent (LAR) homes. Both of these products look to support those of Southwark's residents who are not in a position to buy and the introduction of London Affordable Rent will secure a greater proportion of affordable homes.</p> <p>In addition, intermediate products such as London Living Rent will support households who aspire to home ownership by delivering homes with sub-market rents where tenants have the</p>

	right to purchase their home after a fixed period thus supporting more of Southwark's residents to get on the property ladder. The proposed amendment will therefore also support proposals which deliver 100% low cost home ownership, provided that homes are affordable to residents on a range of incomes and remain affordable in perpetuity.
Social Housing	
Recent developments and regeneration have led to a loss of social housing units in the borough - these need to be replaced with social rented units.	It is anticipated that the proposed policy amendment will secure uplift in the proportion of affordable housing provided by new developments to 40% in many schemes. This will expand Southwark's affordable housing market and improve access to housing opportunities for a wider range of Southwark's population.
Alternative Models / Products	
Additional cheaper forms of housing need to be considered so that local people who work in the public sector and those that work in the multitude of small businesses that exist in the borough, can still afford to remain in the area; thus helping ensure that Southwark and Central London remain economically sustainable and vibrant.	The proposed amendment to policy will deliver a wider range of affordable housing products to meet a variety of different needs. It is anticipated that the proposed changes will make it viable for developers to deliver a higher percentage of affordable housing products. It is anticipated that this will improve access to housing for low and middle income households.
Southwark Council must include Community Land Trusts as a recognised and council supported form of intermediate housing in the borough as part of the New Southwark Plan. CLTs are a vital part of the solution to a growing a major challenge in the borough – the provision of genuinely and permanently affordable homes for those on average incomes.	Community Land Trusts (CLTs) are recognised by the Council as a low cost home ownership product. As such they offer the potential to offer those eligible the opportunity to purchase their home. The proposed policy amendment will support schemes which propose a minimum of 10% low cost home ownership if in tandem with other affordable housing products.
Increased Affordable Housing Target	
Such is the scale of housing need that serious consideration must be given to increasing the affordable housing requirement from 35% to 50%, 70% of this should be social rented, 30% to be intermediate and that no area in the borough has requirements that fall below this.	Southwark's most recent evidence (<i>Southwark Affordable Housing Viability Study 2015</i>) shows that is viable to deliver 35% affordable housing in large housing developments. Nevertheless the overall proportion of homes which should be affordable will be established with the application of further viability testing. As such it may prove viable to deliver

	<p>affordable tenures at greater levels than 35%.</p> <p>The Council recognises there is a much wider affordable housing need than solely social housing. The Mayor states that all households earning less than £90,000 should be eligible to some form of affordable housing – only 8% of Southwark’s residents earn more than this. Accordingly, the Council has a duty to respond to this broad range of affordable housing need, both for low income households requiring social housing provision, but also the significant need of middle-income households who should have access to a larger quantity of intermediate affordable housing.</p> <p>Evidence demonstrates that a larger proportion of affordable housing can viably delivered where developments provide a greater proportion of intermediate products. Our proposed policy amendment therefore seeks to increase the overall affordable housing requirement to a minimum of 40% for schemes providing London Affordable Rent (LAR) as an alternative to social rent. It is anticipated that this will deliver an increased proportion and broader range of affordable housing products which meet a variety of different needs and can benefit a wider range of Southwark’s residents.</p>
<p>The limitation of intermediate homes to 30% and exclusion of the affordable rent tenure does not allow for sufficient flexibility to maximise affordable housing outcomes. Furthermore, affordable rent tenure is required for schemes to secure grant funding under the Mayor’s Housing Covenant 2015-18 grant programme. This could harm one of the key objectives of the NSP to deliver new homes for those on lower to middle incomes and harm the objective of supporting a diverse intermediate sector.</p> <p>On larger strategic sites and regeneration programmes the policy may also limit the ability for schemes to deliver mixed and balanced communities. Considering these points we recommend that Policy</p>	<p>The proposed policy amendment will secure the delivery of a broader range of affordable housing products. This includes endorsing the Mayor’s London Living Rent and London Shared Ownership affordable housing products which will enable schemes to secure grant funding from the GLA under The Mayor’s <i>Homes for Londoners: Affordable Homes Programme 2016-21</i>. This broader range of affordable housing products will support the creation of mixed and balanced communities, improving access to housing for a wider economic demographic.</p> <p>The proposals have not been tested to identify the overall proportion of homes that could be viably provided as</p>

<p>DM1 be amended to allow larger sites to deliver an alternative mix of up to 50% intermediate homes that can be demonstrated as beneficial in terms of overall outputs.</p> <p>In reducing the requirement for social rent, the Council would increase the viability of schemes coming forward through the development process. The introduction of higher levels of intermediate housing would still deliver much needed affordable housing within the borough and the use of different intermediate models would broaden the range of housing types and tenures.</p>	<p>affordable housing. The overall proportion of homes which should be affordable will be established with the application of viability testing. As such it may prove viable to deliver affordable tenures greater than 35%.</p> <p>The policy also makes provisions for area action plans to set alternative affordable housing requirements where the larger strategic sites and regeneration programmes are likely to be implemented. The finer detail of this will be informed by evidence used in the preparation of area action plan documents.</p>
Eligibility	
<p>We propose that the Council should apply flexibility in the imposition of intermediate housing income thresholds and apply a banding for the differing levels of household income which recognises that a wide range of Londoners need assistance in the purchasing their first home.</p> <p>On this basis we consider the Council's local intermediate income thresholds could disqualify a wide section of the current population who do not earn enough to buy in the open market from accessing intermediate homes. The current household income threshold of £39,000 for a one bed flat means that a young couple both earning £20,000 do not qualify for intermediate housing.</p> <p>The Mayor of London in the London Plan (Policy 3.11) states that where Boroughs choose to set local eligibility criteria for intermediate housing any local criteria should only apply for three months and that after this time the London Wide eligibility criteria (currently £71,000 for one/two beds and £86,000 for three bed and larger) should apply. We consider this wording should be adopted in the New Southwark Plan to support the delivery of a range of new intermediate housing in the borough.</p>	<p>The Council's proposed policy amendments to DM1 – Affordable Housing and DM4 – Private Rented Homes seek to deliver a broader range of affordable housing products in order to provide support to an increased proportion of affordable housing products. In particular, the affordable housing products proposed by DM4 – Private Rented Homes seek to address the need for affordable housing support for households earning up to £90,000.</p> <p>The Mayor states households with incomes up to £90,000 are eligible for intermediate housing. Only 8% of households in Southwark have a household income that exceeds £90,000 and disqualifies them from eligibility for any form of affordable housing. It is anticipated that discount market rent products will address a large proportion of the intermediate need from middle income households by providing homes with sub-market rents of at least 20% below open market value. London Living Rent and affordable rent for household incomes between £60,000 and £90,000 per year are two products promoted by the proposed amendment to Southwark's Private Rented Homes policy to address this need.</p>

DM4 – Private Rented Homes

Summary	Council response
Tenancy Arrangements	
<p>The policy should not be so prescriptive and should seek to provide a range of tenancy lengths. A minimum 3-year rental period for each tenancy is too inflexible and is likely to discourage investment. Whilst tenancies of 3 years are common, very often people seeking well managed rental properties require shorter term tenancies. In particular young professionals who are a key source of demand for quality rented accommodation do not, or cannot, commit to such a long timeframe owing to their personal situations.</p>	<p>The policy has been amended to secure tenancies for a minimum three years with a six month break clause in the tenant's favour to acknowledge the more flexible nature of the rental market.</p>
<p>Three year tenancies remain short and are not conducive to settled and stable communities. We support the requirement to deliver affording housing in accordance with DM1 and agree with the reasons for this.</p>	<p>We consider that this policy should respond to the more fluid nature of the rental market and acknowledge that for many people flexibility is a key reason for renting property and they may be deterred by extended tenancies, whilst for more settled residents and families the majority of the PRS market has very limited security of tenure.</p> <p>The policy amendment seeks to respond to these different needs by providing tenancies for a minimum of three years but with a six month break clause in the tenant's favour, as well as structured limited in-tenancy rent increases agreed in advance to provide added security of tenure, avoiding unpredictable rent increases which force tenants to leave properties because they can no longer afford the elevated rent.</p>
Affordable Housing Requirement	
<p>The existing proposed policy requires PRS schemes to provide an equivalent amount of affordable housing to conventionally funded schemes. This is not consistent with the NPPG and London Housing SPG which recognise the distinct economies of PRS and mainstream market housing.</p> <p>The Council acknowledge within The New Southwark Plan Consultation Report October 2015 that "distinct economics of developments of multiple units held in single ownership as private rented sector housing intended for long</p>	<p>The policy amendment seeks to address the differences between PRS and conventional housing by providing additional guidance which provides for PRS schemes to provide affordable housing in accordance with DM1 or provide at least 35% affordable homes, subject to viability at discount market rent. The policy options for discount market rent affordable homes would deliver a wider range of affordable housing products to address Southwark's diverse affordable housing need.</p>

<p>term rental”. However within the New Southwark Plan Preferred Option state that the Council will not accept an affordable housing offer which provides a lower net amount of affordable housing than our policy requirement under DM1. The Council should explore options for discount market rent affordable homes. This would allow a range of rental levels across a development but to be counted as affordable housing, the discounted market rent units would have to meet the NPPF definition of intermediate housing and be affordable to those eligible for intermediate housing in London. The revisions to the NPPF which are currently being consulted upon include revised definitions of affordable housing to include a fuller range of products that can support home ownership.</p>	
<p>It is suggested that DM4 be amended to incorporate sufficient flexibility in the application of its requirement for affordable housing to be provided at an equivalent level to conventionally funded schemes, recognising the distinct economics of the sector and importance of evaluating each scheme on a case by case basis to determine the maximum reasonable level of affordable housing provision.</p>	<p>The amendments to policies DM1 and DM4 allow for differential requirements for build-to-sell development to build-to-rent development. Nonetheless, the Southwark affordable housing viability study (2015) demonstrated it is viable to deliver 35% affordable housing in large housing developments and so this has been used as the base point for both policies.</p>
<p>The supporting text for DM4 recognises the importance of PRS housing, but the affordable housing requirement risks making PRS development in the Borough unviable. We recommend that Policy DM4 be amended to recognise the distinct economies of PRS housing and, accordingly, the statement that PRS schemes must provide equivalent affordable housing to conventional schemes should be removed.</p>	<p>We want affordable homes provided as part of a private rented scheme to benefit from the same quality and management advantages as the private rented homes provided for the open market. As such, the policy amendment confirms PRS schemes should provide a range of discounted rents to the full market rents to reflect local affordability needs across the borough (where affordable housing is not provided as per DM1).</p>
Flexibility of Design Standards	
<p>Flexibility for Build to Rent should include revised design standards in respect of the sizes of units and the mix of units that would be sought. These include a need to provide efficient flexible layouts and greater support for smaller unit sizes. This reflects the advice in the Mayor’s draft SPG which states that research has identified that potential yields and</p>	<p>The policy has been amended to provide for a mix of unit sizes to reflect local need for rented property, allowing flexibility for schemes to respond to local demand in the market. Development proposals must meet the same standards of design required for build-to-sale homes.</p>

<p>investment risk can be affected by having larger units in schemes. Furthermore it notes that Councils should provide flexibility on innovative designs where they meet identified need and are of exceptional standard.</p>	
<p>The Council should provide support for alternative approaches towards purpose built Build to Rent schemes which deliver high quality accommodation and communal spaces which differ from traditional housing. The provision of shared spaces which meet the specific needs of Build to Rent occupiers provides developers with the opportunity to adapt typical unit layouts to account for the out of unit amenity provision such as private theatres and coffee lounges. We would encourage the Council to adopt a flexible approach to the design standards for Build to Rent units where there is an acknowledgement of the exceptional design of both the private and communal areas. This approach would assist in the delivery of substantial new homes within the Borough allowing potential developments to maximise the efficiencies of buildings while ensuring that the quality of design prevents sub-standard accommodation.</p>	<p>The council supports the build to rent sector through amended policy DM4. We have reviewed this policy to give greater certainty for build to rent development but it was not considered appropriate to relax design standards in general to ensure high standards of accommodation.</p>
<p>London Living Rent</p>	
<p>The NSP needs to address current policy debates about a Living Rent model, landlord licensing scheme and social letting agency. As a condition, landlords should be required to offer 5 year assured tenancies to private tenants in homes that are both energy efficient and have property and management standards equivalent to the decent homes standards enjoyed by council tenants.</p>	<p>The amended policy sets out policy options for a discounted market rent, including equivalents for; social rent, London Living Rent and affordable rent between £60,000 and £90,000 which aim to better reflect Southwark's diverse affordable housing needs. Further guidance provided in the policy will secure structured and limited in-tenancy rent increases agreed in advance to prevent sudden increases in rental prices. The policy also confirms new developments for over 50 private rented homes should provide high standards of security and professional on-site management.</p>

DM24 – Office and Business Development

Summary	Council response
<p>The policy should secure greater protection for small business and employment generating uses. Without direct intervention developers will seek to maximise returns on their developments. This will automatically lead to those businesses, usually SME's, being forced out of the area as land values and rents increase beyond their means.</p> <p>Developers should be encouraged to work with local workspace providers who can create and manage the much needed small and creative business workspace. Creative workspace should be seen as place-makers, cultural anchors and even marketing opportunities for developers, bringing multiple benefits to the future residents of a redeveloped Old Kent Road.</p>	<p>The Council acknowledges the importance of SMEs as they represent key employers providing job opportunities for local people and make a vital contribution towards local economy. We recognise these uses are often vulnerable to displacement by other uses following development and therefore need protection. The amended policy seeks to achieve this by extending protection more broadly to all employment generating floorspace except where there is no demand for either the continued use of the site for business or redevelopment involving re-provision.</p> <p>Policy DM26 also provides further guidance regarding the protection and management of small business units. This policy advocates exploring opportunities for the long term management of small business units by a company specialising in the management of space for small businesses.</p>
<p>This policy seems to downgrade the importance of small industrial land use. There are some very successful industrial uses in residential areas. If the land is successfully being used as industrial there should not to be an assumption that it can be released for residential.</p>	<p>The amended policy secures a retention or uplift on the quantum of existing levels of business and/or other employment generating floorspace except in cases where there is no demand for either the continued use of the site for business or for redevelopment involving re-provision. The policy also encourages innovative design solutions for incorporating a range of businesses in mixed-use developments. These provisions are being implemented in order to mitigate the loss of existing businesses, including light industrial uses.</p> <p>Furthermore, all development proposals will be subject to the same levels of examination and public consultation through the planning process and so there will not be an automatic assumption that industrial sites can be released for residential uses. The policy places onus on developers to design schemes which accommodate the needs of existing businesses and wherever possible integrate existing or increased</p>

	<p>levels of business space within completed developments. Development proposals which achieve this will be considered favourably by the Council.</p>
<p>“Rigorous marketing exercise” could be defined further, these could be made transparent, as in other boroughs. Additional restrictions should be included, e.g. permission will not be granted for redevelopment where the continued use of existing small and medium sized units meets occupier needs.</p>	<p>The Council considers that an overly restrictive policy would limit the potential for innovatively designed schemes to come forward which provide for the needs of existing occupiers as well delivering various other benefits which could contribute towards Southwark’s wider development aspirations. To encourage the potential for such opportunities, the marketing exercise should involve an assessment of the site both in its existing state and as an opportunity for improved space.</p>
<p>Arts and cultural production facilities tend to occupy buildings designated to B1 uses, and as such are competing with businesses with far higher economic means in order to access space.</p> <p>Affordability is key to the establishment and sustainability of these production spaces - 'studios' and 'workshops' for the most part - and these kinds of spaces will require special protection in order to remain at the heart of vibrant communities as they become regenerated and improved.</p> <p>Specific reference needs to be made to the protection of existing cultural facilities, and the creation of new opportunities where new mixed use neighbourhoods and communities are emerging. Without emphasising the need for an affordable element, this will be lost in the “transition to mixed use” and the pressure for homes.</p>	<p>The policy is supportive towards the retention and provision of affordable workspaces which provide for the needs of Small and Medium-sized Enterprises (SME’s). The Council recognises the important contribution these local businesses make towards creating a diverse local economy.</p>
<p>The definition of regeneration areas is far too wide ranging and the policy should only be applicable to Opportunity Areas and core Regeneration Areas. This will allow isolated employment sites away from the main regeneration areas and town centres to be developed for other uses.</p>	<p>We want to promote the creation of new jobs alongside ensuring that there is a supply of sites and premises for businesses to grow. This means ensuring there is an adequate supply of business space to meet a variety of business needs. For some businesses there may be practical reasons for why they can operate more efficiently away from Town Centres and regeneration areas. This policy amendment therefore promotes innovative design solutions to encourage schemes which incorporate a</p>

	range of businesses in mixed-use developments.
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DM26 – Small Business Units

Summary	Council response
<p>Arts and cultural production facilities tend to occupy buildings designated to B1 uses, and as such are competing with businesses with far higher economic means in order to access space. These spaces are essential to the professional lives, and employability of creative producers - artists, musicians, performers, etc. - who often have portfolio careers where production, exhibition and education are interlinked parts of their professional and creative lives.</p> <p>Affordability is key to the establishment and sustainability of these production spaces - 'studios' and 'workshops' for the most part - and these kinds of spaces will require special protection in order to remain at the heart of vibrant communities as they become regenerated and improved. Across London artist and cultural space is being lost at an alarming rate, policy must intervene to make sure this trend is staunch.</p> <p>Specific reference needs to be made to the protection of existing cultural facilities and the creation of new opportunities where new mixed use neighbourhoods and communities are emerging. Most of the affordable studio space has historically been based in cheaper commercial premises that are now under pressure from rising land values due to residential or mixed use development. The New Southwark Plan needs to explicitly protect and create cultural production space across the borough.</p>	<p>The Council recognises the vital contribution of small businesses towards sustaining Southwark's diverse local economy, of which arts and cultural uses are an important element. The Council recognises that the provision of small business space is often compromised during redevelopment and regeneration of areas. This policy has therefore been driven by the need to protect small businesses and ensure there is adequate supply of small business space to safeguard, as well as provide support for, business space which supports a vibrant mix of employment uses across the Borough as development proposals come forward.</p> <p>The Council acknowledges that for some proposals there may be practical reasons for why the needs of existing small businesses cannot be provided for in the completed development. In these instances, where existing small businesses are at risk of displacement from a development, this policy amendment seeks to secure the long-term future of these businesses by placing a duty on developers to work with the Council and existing tenants to provide a relocation strategy so that these small businesses can continue to thrive and retain a presence within the locality.</p> <p>The fundamental aim of this policy is to secure the presence of small businesses within the Borough and the Council is hopeful that the measures proposed will secure the long term longevity of existing businesses by seeking to ensure there is no net loss of small business space. In doing so, it is hoped Southwark can stem the tide with regard to the loss of artist and cultural space.</p>
<p>The policy only applies protection to small business units within regeneration areas, leaving those outside regeneration areas vulnerable to loss when development proposals come forward. There is no logical reason why a site that</p>	<p>Policy wording has been amended to secure protection for small business units across the borough, not solely those within regeneration areas.</p>

<p>is successfully operating with business units outside a regeneration area not be afforded the same level of protection.</p>	
<p>Given that preferred industrial areas are being turned into mixed use neighbourhoods, a separate condition should be added which restricts planning permission on any sites which provide accommodation for SMEs and are compatible with surrounding uses.</p>	<p>The amended policy-wording secures Borough-wide protection for small business units which should be safeguarded or reprovided within the completed development. In addition, further guidance provided by the policy amendment requires a relocation strategy for businesses where cannot be provided on-site.</p> <p>Together these measures will secure small business is safeguarded, providing support for existing businesses to retain a presence in the locality and resist any net loss of small business space.</p>
<p>A policy is needed which affords greater financial security to existing businesses and provides further guidance with regards to controlled rents and lengths of lease agreements for SMEs in the area. Shops and business that have been in the area a long time run the risk of being priced out of the area as we see an increase of non-independent and non-local businesses expressing interest, suggesting a continuation of this trend. Controlled rent and length of agreement would provide security.</p>	<p>In certain circumstances there may be practical reasons why businesses cannot be accommodated within the completed the development. The amended policy confirms that in these instances a relocation strategy will be required to support existing businesses to relocate to premises where they can operate more efficiently and continue to thrive.</p>

DM27 – Town and Local Centres

Summary	Council response
<p>Given the scale of development proposed in the Old Kent Road, there is a strong argument to suggest that it should be defined in its entirety initially as a District Town Centre but potentially in the future as the area grows to be a Major Town Centre. The Council must consider future development aspirations when reviewing the town centre hierarchy and consideration has to be given to the potential for 20,000 new homes and 10,000 new jobs in the area contributing to the status of the area. The New Southwark Plan sets out the opportunity to consider Old Kent Road as potential new town centre. In order to ensure development is maximised bringing appropriate levels of new housing and commercial space to these areas it is imperative the Council gives these areas due consideration.</p> <p>Given the quantum of proposed development within Old Kent Road it is clear that the area meets the definition of both District Centres and possibly a Major Town Centres defined in the London Plan:</p> <p>The Old Kent Road is situated over 1.5km from Peckham (a Major Town Centre) and The Blue in Bermondsey (a Local Centre) and is 1km away from the western area of the Old Kent Road/East Street also a local centre. The Elephant and Castle (a Major Town Centre) is sited 3km to the west. To the east of the site (in Lewisham) New Cross is approximately 1.5km away and this would have the function of a local centre. There is therefore a significant distance from the main opportunity area in the Old Kent Road to Major Centres and any facilities closer are local centres.</p>	<p>The Council agrees the significant opportunity and potential benefits presented by Old Kent Road should be widely recognised. This policy amendment elevates the status of Old Kent Road to a Major Town Centre with the intention of acknowledging the prominence of this Opportunity Area as an area of significant change.</p> <p>Although Old Kent Road may lack the attributes and characteristics of a Major Town Centre at present, this designation will set a clear ambition for the area to develop into a major centre in its own right, offering an extensive range of services and employment opportunities attracting residents, businesses and visitors alike.</p>

<p>The Mayor is keen to engage in Southwark's town centre review, in particular the potential identification of a new town centre in the Old Kent Road OA. A key consideration for the Mayor will be the location and size of any new centre.</p>	<p>The policy has been amended to recognise the elevated status of Old Kent Road from District Town Centre to Major Town Centre. The exact location and size of this Major Town Centre will be considered and determined through the progression of the Old Kent Road AAP and subsequent LDS documents which are being prepared in collaboration with the GLA and other interested stakeholders.</p>
<p>An extended OKR/East Street local centre is proposed. It is suggested that there is a mechanism to review this following the adoption of the OKR AAP/OAPF, as it is possible that places in the OA will be shaped by proposed transport improvements, particularly the location of BLE stations.</p>	<p>The AAP's progression will be continually monitored and reviewed over the course of the plan period, however it is anticipated that the location of the town centre will be determined from the outset in order to establish the area of most significant change and develop an economic hub for Old Kent Road which will act as a catalyst for the wider Opportunity Area.</p> <p>The policy amendment elevates the status of the Old Kent Road town centre to Major District Centre to recognise the Old Kent Roads importance as a growth centre and opportunity area of significant change. Whilst proposed transport improvements will inevitably influence the position and nature of this town centre, these considerations be collectively measured and deliberated during the ongoing preparation of the Old Kent Road AAP and may be influenced by feedback received during the consultation process.</p>

4. Monitoring our Consultation

4.1 Why we monitor our consultation

Our statement of community involvement indicates that the success of consultation can be measured by the numbers and diversity of consultees and respondents. As a result we have tried to engage with as many different groups as possible.

We monitor our consultation at every stage so that we can see where we need to engage more with certain groups at the next stage of consultation.

4.2 How we monitor our consultation

After each stage of consultation we will carry out a review of the consultation to see how we could improve the next stage of consultation. This includes reviewing the consultation against the requirements of our statement of community involvement.

Where possible we try to monitor event attendance and monitor attendees' age range, gender and ethnicity by including a monitoring form within our consultation questionnaires so that we can monitor the range of people from our communities that responded to the consultation. However, in many cases respondents do not provide this information.

4.2.2 Options consultation monitoring

At the Options stage we undertook a targeted consultation strategy to ensure that people from different protected groups (there are nine protected characteristics: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion and belief, sex and sexual orientation) had ample opportunities to learn about and engage with the Options document. All events were open to anyone to attend, with a focus on venues that were accessible to all. Events were held on weekdays, weekends and at different times of the day to facilitate participation.

The consultation methods used at Options stage are summarised in Appendix B. These included:

- Announcements at all Community Councils to let the community know that the New Southwark Plan is out for consultation
- Workshops with stakeholders
- Local stakeholder group meetings
- Public exhibitions and community conversations

Council officers engaged residents at over 20 events spread across the different areas of the borough, including at Community Councils, tenants events, and a series of dedicated workshops. The events are listed below (further details are provided in Appendix B):

- Walworth Society
- Camberwell Community Council
- Peckham and Nunhead Community Council
- Tenants conference
- Southwark Living Streets Workshop

- Camberwell NSP Workshop
- Borough and Bankside NSP Workshop
- Forum for Equalities and Human Rights
- Council Assembly
- Southwark Planning Network
- Future Steering Board
- Dulwich and Herne Hill consultation workshop
- Peckham and Nunhead consultation workshop
- Tenant's Council
- Canada Water and Bermondsey consultation workshop
- Elephant and Castle / Walworth consultation workshop
- London Bridge consultation workshop
- Wells Way Triangle
- Southwark Planning Network (Housing Special)
- SE5 Forum
- Camberwell East Area Housing Forum
- Walworth East Area Housing Forum

We received a total of 329 responses at the Options stage of consultation. This included responses from the following diverse range of local groups/organisations, statutory consultees, infrastructure providers and developers/property interests as listed below:

Local groups/organisations

- Future Steering Board Members
- We Are The Public Office
- Grangeward.org
- Bede House Association
- Diocese of Southwark
- King's College London
- Southwark Green Party
- Bermondsey Street Area Partnership
- Friends of Burgess Park
- Better Bankside
- Elephant Amenity Network
- Friends of Nursery Row Car Park
- Friends of Southwark Park
- Southwark Travellers Action Group
- Penarth Centre
- Latin Elephant
- Friends of Nursery Row Park
- Columbia Point Society
- Guy's and St Thomas' NHS Foundation Trust
- Peabody
- Peckham Planning Network
- Peckham Society
- Tabard North Tenants and Residents Association
- London Gypsy and Traveller Unit
- South Bank Employers Group
- SE5 Forum
- Southwark Cyclists
- Southwark Liberal Democrats
- Southwark Residents Say No
- Shad Thames Area Management Partnership
- London Taxi Drivers Association
- Team London Bridge
- Transition Town Peckham
- What If Projects
- United Saviour's Charity
- Walworth Society
- Camberwell Society
- Friends of Peckham Rye Park
- Public Health team (Southwark)
- Peckham Coal Line
- Jam Factory Residents Association
- Bermondsey Village Action Group
- Southwark Living Streets
- Guy's and St Thomas' Charity
- East Walworth Forum
- Intergenerational Foundation

- Friday Social Group (at Southwark Disablement Association)

Statutory consultees

- Natural England
- English Heritage
- Environment Agency
- Corporation of London
- Mayor of London

Infrastructure providers

- Mobile Operators Association
- Port of London Authority
- Sustrans
- Network Rail
- National Grid
- Sport England
- Thames Water
- Theatres Trust
- British Signage Association
- TfL Taxi and Private Vehicle Hire

Developers/property interests

- Grosvenor
- Home Builders Federation
- Folgate Estates Limited
- CBRE Lionbrook (and Southwark Charities)
- CGIS Bridgehouse Limited
- Black Pearl Limited
- Taylor Wimpey Central London
- Dulwich Estate
- Berkley Group
- Spot Property Co.
- TfL Commercial Development (TfL Property)

- Great Portland Estates
- Bidwells
- British Land
- Development Securities PLC
- DV4 Properties Park Street Co. (Delancy)
- Goldcrest
- Kennedy Wilson Europe
- Land Securities
- LaSelle Investment Management
- Lend Lease
- Linden Homes
- London Square Developments Ltd
- Londonewcastle
- MacDonalds
- NHS London HUDU
- WM Morrisons Supermarkets Plc
- Jerwood Space
- Planning Potential
- Pocket Living
- Threadneedle Property Investments
- Scotia Gas Works
- Southwark Studios
- Kentucky Fried Chicken
- Everlasting Arms Ministeries
- Chris Thomas Ltd.
- DV4 Eadon Co. Ltd. And Elephant and Castle (BVI) Co. Ltd. (Delancy)
- Outdoor Media Centre
- Millais Management Ltd
- GL Hearn
- L&Q