

# **Affordable Housing Supplementary Planning Document (SPD): Consultation report**

**July 2025**

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# **1. Introduction**

## **1.1 What is a Supplementary Planning Document (SPD)?**

1.1.1 Supplementary planning documents (SPDs) are a material consideration in the plan-led decision-making process. This means the council will consider guidance within an SPD when assessing and determining a planning application.

1.1.2 SPDs cannot be used to introduce new planning policies and instead provide additional guidance on existing policies in an adopted local plan.

1.1.3 The adopted local plan for Southwark is the [Southwark Plan 2022](#). It was adopted by the Council Assembly on 23 February 2022. It sets out the vision, strategic objectives, and planning policies for development in Southwark for the period 2019 to 2036.

1.1.4 The Southwark Plan 2022 is in conformity with the broader guidelines and policies set out in the [London Plan 2021](#) and the [National Planning Policy Framework \(NPPF\) 2024](#).

## **1.2 What is a consultation report?**

1.2.1 A consultation report explains the consultation that has been undertaken as part of the preparation of the draft Affordable Housing SPD.

1.2.2 This report sets out how we have met statutory requirements as well as any additional local requirements for consultation on supplementary planning documents.

1.2.3 The statutory and local requirements can be found in our [Statement of Community Involvement \(SCI\) \(2022\)](#) which sets out how the Council will consult on planning policy documents and planning applications. The SCI refers to several legal and regulatory requirements, both in terms of methods of consultation and particular bodies that we must engage with.

1.2.4 This report also sets out how the comments received from individuals and organisations during the consultation have been considered and how they have influenced the final version of the Affordable Housing SPD.

1.2.5 Officer responses have been provided to common themes arising from the consultation, with similar comments grouped together under thematic subheadings.

1.2.6 The full responses received during the consultation have been included in appendix A (Consultation hub) and appendix B (Emails) of this report. Responses have been anonymised with any identifying information redacted, unless the response was received by a statutory consultee or public organisation.

## 2. Consultation overview

### 2.1. Consultation process

2.1.1 Southwark Council consulted on the Affordable Housing SPD from 21<sup>st</sup> August 2024 to 27<sup>th</sup> November 2024.

2.1.2 The consultation was hosted on the council's consultation hub and can be viewed [here](#). Responses were also accepted via email to [planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk).

### 2.2 Consultation methods

2.2.1 Table 1 (Statutory consultation) and Table 2 (Additional consultation) set out how the consultation was undertaken in accordance with the council's [Statement of Community Involvement \(SCI\) \(2022\)](#).

Table 1: Statutory consultation

Method of consultation	Consultee	Date
Place the SPD on the council's website.	All	From 21 <sup>st</sup> August 2024
A hard copy of the SPD will be made available at 160 Tooley Street (the Council's offices).	All	From 21 <sup>st</sup> August 2024
Press notice in local newspaper advertising the beginning of the consultation.	All	12 <sup>th</sup> September 2024
Email to all statutory consultees on planning policy database.	All on planning policy consultee database	22 <sup>nd</sup> August 2024 (Announcing the consultation)  18 <sup>th</sup> October 2024 (Publicising consultation events)  20 <sup>th</sup> November 2024 (Reminder of consultation before it closed)

Table 2: Additional consultation

Method of consultation	Consultee	Date
<p>Email sent to all non-statutory consultees on planning policy mailing list. This includes any residents, local businesses or built environment professionals who have signed up for planning policy updates via MySouthwark. At the time of consultation, the list contained 31,159 contacts.</p> <p>These emails primarily promoted the public consultation as well as announcing the public consultation events.</p>	All on planning policy mailing list	<p>22<sup>nd</sup> August 2024 (Announcing the consultation)</p> <p>18<sup>th</sup> October 2024 (Publicising consultation events)</p> <p>20<sup>th</sup> November 2024 (Reminder of consultation before it closed)</p>
Email out to contacts who have signed up for the council's community engagement mailing list. At the time of consultation, the list contained 7,500+ contacts.	All on community engagement mailing list	23 <sup>rd</sup> August 2024 (Announcing the consultation)
Email notifications to tenants and residents associations. This was sent to 167 contacts.	TRA members	<p>22<sup>nd</sup> August 2024 (Announcing the consultation)</p> <p>18<sup>th</sup> October 2024 (Publicising consultation events)</p> <p>20<sup>th</sup> November 2024 (Reminder of consultation before it closed)</p>
Email out to contacts who have applied to the council for planning permission within the last 12 months. This email was inviting contacts to the specific consultation event being held for industry professionals. This was sent to 4,759 contacts.	All who applied for planning permission in last year	23 <sup>rd</sup> October 2024 (Publicising consultation event)
Updates on the council's X / Twitter page	X / Twitter followers	Throughout consultation
Leaflets in Southwark libraries.	Library users	September / October 2024

## 2.3 Consultation events

2.3.1 The following events were organised as part of the consultation process:

Table 3: Consultation events

Event	Date	Attendees	Location
Youth Parliament	9/10/2024	Members of Southwark Council's Youth Parliament	Council offices, 160 Tooley Street
Public event	29/10/2024	Residents and local businesses	Council offices, 160 Tooley Street
Public event	02/11/2024	Residents and local businesses	Peckham Library
Industry event	05/11/2024	Developers and planning agents	Council offices, 160 Tooley Street

## 2.4 Consultation responses received

2.4.1 The following responses were received as part of the consultation process:

Table 4: Consultation responses

Method of consultation	Type of responder	Total per responder*	Total responses
Consultation hub	Residents	18	28
	Planning agents / Developers	5	
	Statutory consultee / LPA	2	
	Other / not specified	3	
Email	Residents	1	15
	Planning agents / Developers	7	
	Statutory consultee / LPA	4	
	Other / not specified	3	
<b>Total</b>			<b>43</b>

### **3. Officer responses to public consultation**

#### **3.1 Accessibility and presentation of SPD**

3.1.1 Some comments were raised regarding the accessibility of language within the SPD.

##### *Officer response*

The guidance had been checked with the Hemingway accessibility tool prior to consultation and will be checked again prior to adoption. This tool ensures text is in plain English and easy to follow. Officers have also added additional clarifications and explanations to the guidance in line with the consultation comments.

#### **3.2 Social rent definition and use of ‘council housing’ as a term**

3.2.1 Southwark Group of Tenants Organisations, 35% Campaign and Southwark Law Centre commented that the definition of social rented housing was loosely defined and should reference the Regulator of Social Housing’s Rent Standard and Guidance for Social Rent.

##### *Officer response*

The consultation version of the SPD included a reference to the Regulator under section 2.1 ‘Social rented Housing’, which provided a detailed definition of social rented housing. These comments therefore refer to the definition of social rented housing in the introduction to chapter 2, which did not include a reference to the Regulator as it was intended to be a high-level overview. Officers have amended the SPD to remove the high-level definition and only provide the detailed definition in section 2.1. This therefore provides a detailed, robust definition of social rented housing (with reference to the Regulator), whilst avoiding the repetition of having the definition in two locations of the same document.

3.2.3 All groups recommended that council housing be included in the SPD as an acceptable form of social rented housing.

##### *Officer response*

This had been included in the SPD under the umbrella term ‘social rented housing’. The definition of social rented housing has been amended to make this distinction clear and reference that it may also be known as ‘council housing’ when owned by the council.

3.2.4 There was also concern from Southwark Group of Tenants Organisations and 35% Campaign that social rented housing could be substituted for Affordable Rent. The groups suggested the definition of social rented housing explicitly excludes the use of Affordable Rent.

### *Officer response*

Affordable rent is not accepted by the council as social rented housing or genuinely affordable housing, as this is defined by the Government as rents set at or above 80% of market value. Social rented housing is typically 40-50% of market value. This is stated in section 2.3 under 'Not accepted affordable housing' and in Table 1 'Genuinely affordable housing'. This is seen as sufficient to demonstrate the council's position of Affordable Rent. As such, no changes have been made to the SPD guidance.

## **3.3 London Living Rent**

3.3.1 Southwark Law Centre and Southwark Group of Tenants Organisations suggested that London Living Rent should be preferred over shared ownership.

### *Officer response*

Policy P1 of the Southwark Plan states that London Living Rent (or equivalent) is the prioritised intermediate rent choice but does not prioritise intermediate rent over intermediate home ownership (such as shared ownership). Policy P1 instead requires a mix of intermediate tenures which should be suitable for a range of incomes, which may require mix of rent and ownership options. This is reflected accordingly in the SPD, and as such no changes have been made to the guidance.

3.3.2 35% campaign objected to the definition of London Living Rent as a product designed to help the transition into shared ownership. The group objected on the basis that a 2017 London Tenant's Federation Briefing '*Genuinely affordable housing or just more of the affordable housing con?*' noted that rents can be on average 67% of market levels (up to 80% in some cases) and that rents at this level did not allow for savings towards shared ownership.

### *Officer response*

These percentages are for the whole of London and the map provided in the 2017 cited briefing shows Southwark at the lower end to average for this percentage. The evidence base within the 2017 paper is not disclosed. London Living Rent levels are set by the GLA and based on a third of average local household incomes and adjusted for the number of bedrooms of each home. This is seen as acceptable for an intermediate rent option and is stated in Policy P1 of the Southwark Plan. As such, no changes have been made to the SPD guidance.

## **3.4 Discount market rent**

3.4.1 Five groups have requested clarity on the council's position on Discount Market Rent, including 35% campaign, DP9 (on behalf of British Land), DP9 (on behalf of Get Living), Lichfields and the Greater London Authority (GLA). Lichfields also commented that the guidance on Discount Market Rent introduced new policy, which is not permitted under an SPD.



### *Officer response*

The definition of discount market rent has been clarified. The SPD stated that discount market rent was not accepted as genuinely affordable housing, however Policy P1 states it is accepted, where rent levels are equivalent to London Living Rent. Where rent levels are not equivalent, discount market rent is not accepted. Officers have amended the SPD accordingly to clarify the position.

The comment from Lichfields suggested that Discount Market Rent is fully accepted under Policy P1 of the Southwark Plan, however this is not the case. Policy P1 is clear in the type of Discount Market Rent which is accepted and the type which is not and does not fully accept the tenure.

## **3.5 Shared ownership**

3.5.1 Southwark Law Centre, Southwark Group of Tenants Organisations and NHS NHS London Healthy Urban Development Unit (HUDU) stated that shared ownership should no longer be supported as an intermediate housing option. Reference was given to a House of Commons Shared Ownership report, published in March 2024, which questioned the affordability of shared ownership given rising rents, service charges and maintenance costs.

The groups also raised concerns that the SPD was promoting shared ownership as a primary or preferred form of intermediate housing.

### *Officer response*

Whilst the findings in this report have been considered, the SPD is not able to exclude shared ownership as this option is accepted as a form of intermediate housing in Policy P1 of the Southwark Plan. An SPD is not able to deviate from or amend adopted policy. As such no changes have been made to the SPD. Changes to housing policy will be assessed as part of the Southwark Plan review.

The SPD does not promote shared ownership as a preferential intermediate housing options as the list of definitions is written in no particular order and no preference is stated. Policy P1 of the Southwark Plan requires a mix of intermediate tenures which should be suitable for a range of incomes. This may require mix of intermediate rent and intermediate ownership options. This is reflected in the SPD and as such no changes have been made

3.5.3 A comment was made in relation to greater clarity on the eligibility thresholds for shared ownership.

### *Officer response*

The council previously set its own household income thresholds for shared ownership eligibility; however, this requirement was removed in January 2024. The council now follows the GLA eligibility threshold of households, with incomes of no more than £90,000. No reference was therefore made in the SPD to the Southwark threshold as

the requirement had been removed. Officers have since added a reference to the previous requirement in the SPD and clarified the council's position on this matter.

### **3.6 Key worker housing**

3.6.1 Southwark Law Centre raised concern that key worker housing with rents at London Living Rent level would not be affordable to a teacher in Southwark.

#### *Officer response*

Key worker housing is classed as an intermediate rent option and London Living Rent is the council's prioritised intermediate rent level. This is underpinned by the evidence base which supported the adoption of the Southwark Plan 2022.

3.6.2 DP9 (on behalf of British Land) raised concern that capping the rent for key worker housing at London Living Rent and household income at £67,000 is restrictive and would exclude individuals in shared accommodation in genuine housing need. Example income caps were provided based on three to four occupants in shared accommodation, alongside example Southwark rent levels. It was suggested that the income cap was too low to allow for key worker housing to be delivered as larger three-to-four-bedroom units. The guidance was suggested to be amended to allow occupants to be granted individual tenancies (with rents aligned to 28% of gross income), where key worker housing is delivered as shared accommodation and occupied by two or more unrelated households.

#### *Officer response*

The London Living Rent income cap is set by the GLA and as such, the council is unable to amend the threshold. It should also be noted that the council expects most key worker housing to be delivered as two-bedroom units, aimed at two sharing occupants and it is unlikely to come forward as larger units. This means the income cap should not be a restrictive factor as both sharers could earn around £30,000, which is in line with the incomes most suited for intermediate housing.

3.6.3 DP9 (on behalf of British Land) further raised concern regarding the occupations included as key workers in the SPD. Broadly supportive of the occupations, it was suggested to add public transport drivers on trams, trains, buses and coaches to recognise their contribution to maintaining London's transport network. It was also suggested to add Biomedical sector professionals to reflect the Government's Industrial Strategy and the Mayor's objective for London to become a destination for life sciences.

#### *Officer response*

The council's definition of key workers was approved by Cabinet in March 2021 under the Intermediate Rent Policy. The SPD is not seeking to review this definition at this stage and is instead aiming to provide additional guidance around the key worker housing tenure. It should be noted that the suggested professions are likely to have

income levels and housing need which are better addressed by shared ownership or other intermediate rent options, rather than key worker housing which is aimed at middle-income earners under £67,000.

3.6.4 NHS Healthy Urban Development Unit (HUDU) raised concern that the definition of key worker occupation was too narrow. It was suggested to add support staff within the NHS to occupation list, in addition to nurses, doctors and other clinical staff employed by the NHS which are already included. This should cover non-clinical staff who could be care workers, security, porters, housekeeping or other support roles which are valuable to the NHS. It was also requested that the NHS or other key worker employers in the borough be asked to identify priority staff groups for key worker housing where appropriate.

*Officer response*

The council's definition of key workers was approved by Cabinet in March 2021 under the Intermediate Rent Policy. The SPD is not seeking to review this definition at this stage and is instead aiming to provide additional guidance around the key worker housing tenure. It should also be noted that the suggested professions are likely to have income levels and housing need which are better addressed by social rented housing, rather than key worker housing which is an intermediate housing option aimed at middle-income earners.

3.6.5 NHS Property Services supports the inclusion of key worker housing and the definition of key workers in the SPD.

3.6.6 35% campaign raised concern that eligibility for key worker housing is based on employment and occupation status rather than housing need. The group suggested that key workers would be better served by provision of secure tenancies (as opposed to the time limited tenancies as a key worker) and other types of low-cost affordable housing.

*Officer response*

Key worker housing is dependent on occupation to recognise the essential work carried out by these occupations which is critical to many important services in the borough and wider London area. Key worker housing is also dependant on household income, which is seen as sufficient to ensure those in genuine housing need will have their requirements met.

### **3.7 Community Land Trusts (CLTs)**

3.7.1 35% Campaign and Southwark Law Centre raised concerns regarding the ability of Community Land Trusts (CLTs) to make large contributions to affordable housing delivery in the borough.

### *Officer response*

CLTs are included as an acceptable form of intermediate housing in the SPD providing the homes will be delivered at 'genuinely affordable' rent or ownership levels. CLTs have been included in the SPD to ensure consistency with the accepted forms of affordable housing listed in Policy P1 of the Southwark Plan 2022. The council does not expect or rely upon CLTs to make a large-scale contribution to affordable housing delivery in the borough, but wants to acknowledge the benefits that community-led schemes can bring. The guidance in the SPD has been updated to reflect how CLTs can form a small part of an overall scheme's intermediate housing offer.

3.7.2 The groups requested more information on how CLTs will be delivered. London Borough of Lambeth further requested greater clarity on CLT guidance.

### *Officer response*

CLTs are community and placed based organisations, the formation of which is led by the local community and not the council. This means the delivery of CLT-led housing will depend on a community group coming forward. The guidance in the SPD has been updated to provide additional information on CLT delivery where possible.

## **3.8 Not accepted affordable housing**

3.8.1 Several groups requested clarity on the council's position on Discount Market Rent, which was previously listed in the SPD as not an acceptable form of affordable housing. Officer responses to these comments have been provided under section 3.4 'Discount Market Rent'.

3.8.2 The GLA and Southwark Law Centre have requested clarity on the council's position on London Affordable Rent (LAR).

### *Officer response*

The SPD states that LAR is not accepted as a form of affordable housing as it not considered to be 'genuinely affordable'. This is in line with Policy P1 of the Southwark Plan 2022 and is not a new policy decision. Both groups reference how LAR is supported by the London Plan 2021 as a low-cost rent product and how rent levels can be more affordable than other intermediate rent options. SPDs cannot be used, however, to amend adopted policy. As such, no changes will be made to the guidance. The inclusion of LAR as an acceptable form of affordable housing will be considered as part of the next local plan review.

3.8.3 A mix of responders requested clarity on the remaining housing options which the council does not accept as genuinely affordable housing. This included a resident, a viability consultant and Lichfields. The responders requested the evidence which the council's decision making was based on.

### *Officer response*

The SPD had set out the high rent levels as the primary reason for the exclusion of these housing types. This is not new policy or guidance and this is set out under Policy

P1 as part of the adoption of the Southwark Plan 2022. The decision was underpinned by the evidence base which supported the plan's adoption, including the SHMA 2019 and Housing Background Paper 2019. This evidence outlined the acute need for social rented and intermediate housing in the borough and how rents of 80% of market levels are not affordable to Southwark residents. 93% of residents have a household income that requires social and intermediate housing. 81% of these residents require social rented (31%) or intermediate rent homes (50.4%), with only a minority able to afford intermediate shared ownership (11.9%). As such, the higher rents were not seen as acceptable, genuinely affordable housing. Officers have amended the SPD to reference the evidence base.

### **3.9 Securing affordable housing**

3.9.1 Lichfields raised concern with the SPD's requirement of 'no more than 50% of the market units within the development can be occupied before the affordable housing units are completed and handed over to the registered provider'. This is included in section 3.1 'On-site delivery of affordable housing' and 3.2 'Off-site delivery of affordable housing'.

#### *Officer response*

This is a requirement used within development management and is not a new policy. It is used to ensure timely completion of affordable housing units, and the council would only remove this requirement in exceptional circumstances. Lichfields have requested a caveat to allow for case-by-case assessment, where necessary. Case-by-case assessment is a practice already used for the determination of planning applications where exceptional circumstances will be considered. As such, no change has been made to the guidance in the SPD.

3.9.2 Southwark Group of Tenants Organisations and Southwark Law Centre raised concern with the requirement to 'robustly justify' the provision of affordable housing which is not on-site. This is set out in section 3.2 'Off-site provision of affordable housing' and section 3.3. 'Payments in lieu of affordable housing' in relation to developments creating 10 homes or more. The groups are concerned that 'robustly justify' is not defined, and examples of circumstances should be given where off-site provision or payment-in-lieu would be allowed. Tailored Living Solutions (TLS), MJD Planning and Henshall & Partners further requested clarity on the 'exceptional circumstances' when off-site provision and payment-in-lieu of affordable housing would be acceptable. TLS and MJD stated that there is uncertainty around the council's position on this matter and it is difficult for developers to anticipate the council's decision making.

#### *Officer response*

The requirement to robustly justify is outlined in paragraph 64 of the National Planning Policy Framework (2024). The SPD also sets out the council's presumption for on-site provision of affordable housing (as outlined in Policy P1 of the Southwark Plan 2022)

and that off-site provision or payment-in-lieu would only be accepted in exceptional circumstances. Providing examples is not seen as practical as 'exceptional circumstances' can only be ascertained following a site and case specific assessment of each proposed development. Officers do not want to restrict the possibility of on-site delivery by defining factors which may be used to circumvent it but may impact different sites to varying extents. There is further no uncertainty in the council's position which clearly states in the SPD and Policy P1 that the presumption is for the on-site delivery of affordable housing. This is seen as sufficient to allow developers to anticipate the council's decision making. As such, no changes will be made to the guidance in the SPD.

3.9.4 A resident requested that the SPD be amended to require the delivery of social rented housing to be on-site.

*Officer response*

The SPD and Policy P1 require the full affordable housing provision to be delivered on-site and only allow for off-site provision or payment-in-lieu in exceptional circumstances. As such, no changes will be made to the guidance in the SPD.

### **3.10 Payment in lieu of affordable housing for developments of 1-9 homes**

3.10.1 Concerns surrounding the viability of affordable housing for developments of 1-9 homes (also known as small sites development) were raised by three developers including Tailored Living Solutions, Tide Construction, and Henshall and Partners, as well as five planning agents. These concerns were also raised under the consultation for the Section 106 (S106) and Community Infrastructure Levy (CIL) SPD.

*Officer response*

The viability of developments is covered under the S106 and CIL SPD and the accompanying consultation report as this extends beyond the considerations of affordable housing and must have regard to wider planning matters. Please refer to section 3.3. of the S106 and CIL SPD consultation report for a full response to these concerns.

### **3.11 Publicising viability assessments**

3.11.1 Southwark Law Centre and Fight4Aylesbury raised concerns with the council's approach to the publication of viability assessments. The groups stated that full viability assessments should be publicised from the outset of a planning application, as opposed to allowing only a summary to be public until a planning committee. Southwark Law Centre also requested further detail on what is required in a viability assessment

*Officer response*

Since the adoption of the Southwark Plan 2022 viability assessments have been required upon the validation of all planning applications which deliver affordable

housing (unless following the fast-track route). This is included in the council's validation requirements. The SPD originally reflected this position and stated that any application going through the viability tested route will not be accepted as valid unless a complete financial viability assessment (and its public executive summary) has been submitted. The guidance in the SPD has been amended to clarify that the full financial viability assessment will be made available for public scrutiny at validation stage, alongside the executive summary.

The requirements for a viability assessment are set out in the SPD as well as in the council's validation requirements which state the need for 'a testable, editable electronic or software model that shows the calculations and assumptions used in the planning application'. This is seen by officers as a sufficient explanation of the requirements of a viability assessment.

### **3.12 Fast-track route**

3.12.1 A viability consultant and the GLA have requested clarity on the council's approach to the fast-track route. This allows planning applications with a policy compliant affordable housing provision to be submitted without the need of a financial viability assessment.

#### *Officer response*

The council's position, as set out under Policy P1 of the Southwark Plan 2022, is that planning applications can be submitted without a financial viability assessment if providing 40% affordable housing (with a policy compliant tenure mix). This is higher than the GLA's requirement for the fast-track route of 35%, which is set out in Policy H5 of the London Plan 2021. The comments queried if the SPD and Policy P1 were in conformity with the GLA as the council's requirement is higher. Policy H5 point C.3 allows for boroughs to set additional policy requirements and obligations where relevant. The higher requirements were further noted as 'justified' by the Planning Inspectorate when adopted as part of Policy P1 under the Southwark Plan 2022, where the requirements were deemed in conformity with the London Plan 2021. This has also been confirmed by the Accelerating Housing Delivery Planning and Housing Practice Note December 2024.

3.12.2 A resident raised concern regarding the public consultation requirements for planning application following the fast-track route. There was concern that developers could bypass public consultation when following the fast-track route as no details of any requirements were referenced in the SPD.

#### *Officer response*

The consultation requirements remain the same for applications following the fast-track route as other planning applications of the same scale. The full requirements are set out in the council's Statement of Community Involvement (SCI) and Development Consultation Charter 2022. Officers have amended the SPD to clarify this.

### **3.13 Purpose-built Student Accommodation (PBSA)**

3.13.1 Southwark Law Centre requested that the SPD be used as an opportunity to provide nomination only purpose-built student accommodation (PBSA) to allow for student housing delivery to relate to specific needs.

#### *Officer response*

This would be contrary to Policy P5 'Student homes' of the Southwark Plan 2022 which currently allows for direct let student accommodation as well as nomination schemes (which have an agreement with a higher education institution). The SPD is only able to provide guidance on adopted policies and cannot be used to make amendments or introduce new policies.

3.13.2 Southwark Law Centre further requested more information on the council's approach to viability testing for PBSA.

#### *Officer response*

Planning applications for PBSA can follow the viability tested route or fast-track route in the same manner as an application for conventional housing. This allows the council to have a consistent approach to viability testing for the provision of affordable housing. PBSA is also expected to follow the council's hierarchy for affordable housing delivery, with the expectation being that homes are provided on-site with off-site, or payment-in-lieu provision only accepted in exceptional circumstances. The SPD has been updated to reflect this approach, signposting the relevant sections of viability testing and affordable housing delivery within the PBSA guidance to avoid repetition.

3.13.3 A resident requested that the SPD is updated to specify the evidence developers must provide to demonstrate the need for any proposed PBSA scheme. Southwark Group of Tenants Organisations similarly suggested the council update the SPD to demonstrate the need for PBSA in the borough.

#### *Officer response*

Demonstrating the need for PBSA is out of the scope of the SPD, which is only focused on affordable housing requirements and not wider land-use and planning considerations. SPDs are topic or policy specific and are not able to address planning matters beyond the intended remit. Guidance on PBSA and avoiding over-concentration has been provided in the GLA's Purpose-built Student Accommodation London Plan Guidance (LPG) 2024. This LPG, in combination with Policy H15 'Purpose-built student accommodation' of the London Plan 2021 and Policy P5 'Student homes' of the Southwark Plan 2022 (as well as the evidence base underpinning the plan) is seen as sufficient to address concerns regarding guidance on PBSA need.



### **3.14 Service charges**

3.14.1 Southwark Law Centre and Southwark Group of Tenant Organisations both stated concern that there is potential for developers to exclude affordable housing tenants from communal facilities (e.g an on-site gym) on the basis that service charges would not be affordable for those residents if those facilities were included. The SPD states that residents of affordable housing should be given the same access rights to all amenities and facilities as the occupiers of market housing. However the groups have suggested that 'communal facilities' be defined to make clear which services should be included.

#### *Officer response*

It is not seen as practical to define communal facilities as these services can vary from scheme to scheme and any definition would not be sufficiently exhaustive. The SPD has been amended, however, to strengthen the guidance regarding communal facilities. The SPD now states that it should be for the residents of the affordable housing to opt-out of additional facilities, but they should be given full rights of access, nonetheless. This amendment has also addressed a suggestion by the GLA to strengthen the guidance on rights of access to facilities for affordable housing residents.

3.14.2 Lichfields (on behalf of Berkeley Homes) has recommended that 'as far as is practical' be added to the guidance requiring equal access to communal facilities for residents of affordable housing to make allowances for Registered Providers who are aiming to keep service charges as low as possible.

#### *Officer response*

This recommendation will not be added to the SPD as the council believes residents of affordable housing should have full equal access. The amendment referenced above in 3.14.1 which allows residents to opt-out of more expensive facilities, is seen as sufficient to allow flexibility within setting service charges.

3.14.3 Southwark Group of Tenant Organisations have recommended that the service charge cap be extended to all affordable housing options. This is currently only set or determined in accordance with the Rent Standard for social housing.

#### *Officer response*

It is not within the scope of the SPD to secure service charge caps for all affordable housing options. Many affordable housing options, such as London Living Rent (LLR), have benchmarks and rents which are not even within the council's remit to control as the levels are set by the GLA.

3.14.4 A resident has recommended that service charges should be included in rent levels.

*Officer response*

Similar to the matters discussed under 3.14.3 above, this is not a change which can be secured under an SPD or within the council's remit when concerned with private developments.

### **3.15 Monitoring affordable housing delivery and enforcement**

3.15.1 Southwark Law Centre made comments in relation to the council's annual audit of affordable housing, stating it is not satisfactory and has not occurred since 2022.

Southwark Law Centre also stated concerns about the process relying on developer supplied information which could be unreliable. This matter was also raised by Southwark Group of Tenant Organisations. Both groups raised concerns with how the council can check the accuracy and trust this data, as well as how non-compliance is enforced.

*Officer response*

The council considers the annual housing audit to be satisfactory as it is conducted annually and in compliance with the decisions from the Local Government Ombudsman in [2016 and 2022](#). It has been conducted annually since 2021, having first been carried out in 2016. The annual audit process starts in March and covers the previous financial year. Results are published as soon as a response is received from a registered provider and the data has been validated by council officers. This means the results will update throughout the audit period. The audit is available via the council's [website](#), which also lists the information collected from developers and registered providers.

3.15.2 Southwark Law Centre also stated concern about the process relying on developer supplied information, which could be unreliable. This matter was also raised by the Southwark Group of Tenant Organisations. Both groups raised concerns with how the council can check the accuracy and trust this data, as well as how non-compliance is enforced.

*Officer response*

The audit is led by the planning policy team within the council, who email a mandatory template to all registered providers recorded as operating in the borough. If no response is received after a reasonable period, the matter is handed over to the council's planning enforcement team to investigate the non-compliance.

The data which is received from the registered provider is cross-checked against council records and any discrepancies found are handed over to the enforcement team to investigate. Discrepancies in data do not mean the supplied information is unreliable as sometimes it can be the result of the legal transfer of units (such as the full staircasing of a shared ownership unit). The council is confident in its thoroughness for checking data accuracy within the audit and the approach is in compliance with the expectations set out by the Ombudsman.

3.15.3 Three residents raised questions regarding what enforcement action which will be taken against developers or registered providers who do not comply with affordable housing obligations.

*Officer response*

These matters are handled by the council's planning enforcement team. All Enforcement cases are a matter of record on the Enforcement register the outcome of each case can be seen by looking at the register.

## **4. Appendices**

### **4.1 Appendix A: Full responses received via consultation hub**

REF	In what capacity are you responding to this survey?	Type your answer	If part of an organisation, please state which:	Do you think guidance is easy to find in the document?	Do you think the guidance is easy to understand?	What parts of the document could be improved?	Do you have any further feedback on the overall document?
1	As a resident			Agree	Agree		
2	As a resident			Disagree	Disagree		
3	As a resident			Agree			
4	As a resident						
5	As a resident ;As someone who works in the area;As someone who studies in the area	I own a rental property in the area.		Agree			
6	Other			No opinion			
7	As a resident			Agree	Agree		
8	As a resident			Strongly agree			
9	As a resident			No opinion	No opinion	a simple brief of what the survey about	
10	As a resident			Agree			It is not clear what you are consulting about - if it is about the principle of having such a document at all, then I would recommend that you abandon the whole idea.
11	As a planning agent			No opinion	No opinion		
12	As a resident			No opinion			
13	As a resident			Disagree	Disagree	Executive summary	
14	As a planning agent			Agree	No opinion		
15				Strongly agree	Strongly agree		
16	As a resident	NHS Property Services Limited who manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations.	NHS Property Services Limited	Strongly agree	Strongly agree		
17	Other						
18	As a resident			Disagree	Disagree	Having example of standard working couple who are trying to buy an afford housing would be useful to understand what this all actually mean to people. Could we have in bold the key messages please? And the "fact boxes" appear randomly placed around the document, unhelpful. Have you checked accessibility of the language? It is very difficult to follow and yet I have a very high reading ability and a little knowledge of planning terms	
19	As a resident			Disagree	Disagree		It is not clear what you are expecting of the general public Southwark Council must consider increasing the provision of affordable housing from 35% to 50% to tackle the inequality in the borough. New developments in Wandsworth Council, another South London Labour borough, could soon be required to provide at least 50 per cent affordable housing <a href="https://www.mylondon.news/news/south-london-news/south-london-borough-make-major-30422245?int_source=nba">https://www.mylondon.news/news/south-london-news/south-london-borough-make-major-30422245?int_source=nba</a>
20	As a resident			No opinion	No opinion		

					I know that central government has been trying to encourage the move away from PDFs for planning documents and think this is very much the kind of policy that would be easier to navigate in interactive form that jumped to those parts relevant to the reader. And whereas other SPDs (eg the householder one) need to be created with non-online readers in mind, this one is not aimed at individuals and therefore the digital divide is not much of an issue here.
	As a resident ;As someone who works in				
21	the area		Agree	Agree	
22	As a resident		No opinion	No opinion	
23	As a developer	Tailored Living Solutions Limited.	Agree	Agree	
24	As a planning agent	Affordable Housing 106 Ltd	Disagree	Disagree	
25	As a resident		No opinion	No opinion	
26	Other	Public Health Southwark Council	Agree	Agree	
27	As a developer		No opinion	Agree	
28	As a representative of a community group	Southwark Group of Tenants Organisations			Many assumptions not supported by evidence

REF	Do you think any of the following sections require further explanation?	If you selected a section or multiple sections, please tell us why	Do you have any further feedback on chapter 2 'Affordable housing definitions'?	Do you think any of the following sections require further explanation?	If you selected a section or multiple sections, please tell us why	Do you think the types of residential development which are liable for a financial contribution require further explanation?	If you selected a type or multiple types, please tell us why
1	Social rent ;Shared ownership ;Affordable rent			On-site delivery of affordable housing ;Off-site delivery of affordable housing ;Payments in lieu of affordable housing		No	
2	Social rent ;London Living Rent ;London Affordable Rent			On-site delivery of affordable housing ;Off-site delivery of affordable housing		No	
3	Affordable rent	Given discounts can be larger than 20%, it doesn't follow that the resulting rent would have to be unaffordable. Would be good to expand on why this is rejected.					
4	Discount market rent			Off-site delivery of affordable housing	Last sentence in last paragraph is incomplete.	No	
5	Social rent ;London Living Rent			On-site delivery of affordable housing			
6						No opinion	
7	Social rent ;London Affordable Rent ;Affordable rent			On-site delivery of affordable housing		Yes	
8			I found these definitions were clearly explained in the document.		Could you add a worked 'example/illustration' in Fact Box 3: Formula for Payment in Lieu..? I find the formula too abstract!	No	
9	Community Land Trusts (CLTs)			Payments in lieu of affordable housing ;Payments in lieu of affordable housing ;On-site delivery of affordable housing		No	
10	Social rent						
11							
12	Social rent			On-site delivery of affordable housing ;On-site delivery of affordable housing ;Off-site delivery of affordable housing	Why do affordable housing need to always be offered?	Yes	
13	Social rent			Off-site delivery of affordable housing ;Payments in lieu of affordable housing			
14	Community Land Trusts (CLTs) ;Key worker housing			Payments in lieu of affordable housing ;Payments in lieu of affordable housing		Yes	
15	London Living Rent			On-site delivery of affordable housing		Yes	
16	London Living Rent						
17			NHSPS welcomes the inclusion of key worker housing in the SPD and supports the definition which includes nurses, doctors, and other clinical staff employed by NHS. The sustainability of the NHS is largely dependent on the recruitment and retention of its workforce. Most NHS staff need to be anchored at a specific workplace or within a specific geography to carry out their role. When staff cannot afford to rent or purchase suitable accommodation within reasonable proximity to their workplace, this has an impact on the ability of the NHS to recruit and retain staff. Housing affordability and availability can play a				
18	Social rent ;Shared ownership ;London Living Rent ;Community Land Trusts (CLTs)	I've heard of them before but I would like to understand what each section affect the affordable housing.					
19			Definitions are ok	On-site delivery of affordable housing	It is not clear what would be "unacceptable" and what the parameters would be to over-ride that. It is unlikely that nearby residents would feel able to support this policy as it stands, yet many support affordable housing	No	
20							
21						No	

22	Social rent ;Affordable rent	<p>I disagree with the definition of Social Rent as it is too loose. The definition should make reference to the Regulator of Social Housing's Rent Standard and Guidance for Social Rent which sets out conditions for something being classified as socially rented housing. It is important that the definition of Social Rent reflects that this is long-term, more secure rent. Leaving the current loose definition would create a situation in which Affordable Rent might be allowed in place of Social Rent.</p>	<p>There are no products for people on incomes lower than £60k pa. The intermediate products listed are for people on incomes of over £60k. This leaves a gap in the offer of intermediate products and means that people in this category are not catered for.</p>	On-site delivery of affordable housing	<p>The SPD should state explicitly that the delivery of socially rented housing must be onsite. It is important that all new developments have a mixture of housing types.</p> <p>THE COUNCILS DEFINITION OF WHAT IS AN "EXCEPTIONAL CIRCUMSTANCE" REQUIRES MORE DETAILED GUIDANCE AND EXPLANATION.</p>	No opinion	<p>THE COUNCILS DEFINITION OF WHAT IS AN "EXCEPTIONAL CIRCUMSTANCE" REQUIRES MORE DETAILED GUIDANCE AND EXPLANATION.</p>
					<p>THE COUNCILS APPLICATION OF "EXCEPTIONAL CIRCUMSTANCE FOR PAYMENT IN LIEU OF AFFORDABLE HOUSING" REQUIRES MORE DETAILED GUIDANCE AND EXPLANATION.</p>		<p>THE COUNCILS APPLICATION OF "EXCEPTIONAL CIRCUMSTANCE FOR PAYMENT IN LIEU OF AFFORDABLE HOUSING" REQUIRES MORE DETAILED GUIDANCE AND EXPLANATION.</p>
23				Payments in lieu of affordable housing	<p>BOTH TO ENSURE THAT THE COUNCIL APPLY CONSISTENT, FAIR AND REASONABLE DECISION MAKING FOR APPLICATION OF EXCEPTIONAL CIRCUMSTANCES TO SUPPORT PAYMENT</p> <p>Does not cover fast track applications - should refer to it here. Is there a fast track policy, and if so what % would that be? Shouldn't it be 35% as per the London Plan? Clarification as to policy compliance. Is it 35% with no viability submission? If viability submitted, and agreed AH below 35%, is the viability late stage review target 35% or 50% ? No justification required to seek 50% as a target.</p>	Yes	<p>BOTH TO ENSURE THAT THE COUNCIL APPLY CONSISTENT, FAIR AND REASONABLE DECISION MAKING FOR APPLICATION OF EXCEPTIONAL CIRCUMSTANCES TO SUPPORT PAYMENT</p>
24	Discount market rent ;Affordable rent ;London Affordable Rent	<p>These are all valid AH products. Rents can be set up to a maximum level subject to affordability. There is therefore no reason to remove them as an AH product as they can be affordable. The Council has produced no supporting evidence that they are not genuinely affordable, and that they have to be removed in their entirety.</p>	<p>Social Rent - Does not define what is considered affordable household income in relation to income/earning values</p>	Off-site delivery of affordable housing ;Payments in lieu of affordable housing		No opinion	
25	London Affordable Rent	<p>2.3 gives no explanation as to why Southwark rejects LAR. Given the many job vacancies in Southwark and generally higher salaries in Inner London, it does make sense to reject this.</p>		On-site delivery of affordable housing ;Off-site delivery of affordable housing	<p>The document has no details on how Southwark might provide affordable housing by buying back housing stock from local or ex-local authority (or housing association) blocks when they come back to market. This would make far more sense than the environmental waste of newbuild LA housing (e.g. Grange Walk, which is still incomplete and running over a year behind schedule) and new developments in the hope the developer honours its commitment to affordable housing (which is rarely the case).</p>	No opinion	
26							
27							



		<p>We strongly believe that council housing should be included in the SPD's table of genuinely affordable housing, as a third type of acceptable affordable housing. We suggest that this be defined as housing that is owned by the council and let on a secure tenancy at the level of rents as set by the Regulator of Social Housing, according to their Rent Standard.</p>
28 Discount market sale	<p>We note that the SPD details that discounted market sale should be 'at least 20% below open market equivalent.' This means that rents can be at up to 80% market price. However, the SPD also states that it does not accept affordable rent and discount market rent, because Southwark does not consider it to be 'genuinely affordable', despite them possessing similar discount levels.</p>	<p>We further believe that council housing should be the preferred tenure as the most secure and affordable type of affordable housing. We note that both the Mayor and Southwark Council have stated that 50% of all new housing provision should be affordable and that the</p>

REF	Do you have any further feedback on chapter 3 'Securing affordable housing'?	Do you think any of the following sections require further explanation?	If you selected a section or multiple sections, please tell us why	Do you have any further feedback on chapter 4 'Viability assessments and reviews'?	Do you think any of the following sections require further explanation?	If you selected a section or multiple sections, please tell us why	Do you have any further feedback on chapter 5 'Non-conventional housing'?
1					Purpose-built student accommodation (PBSA) ;Houses in Multiple Occupation (HMOs) Houses in Multiple Occupation (HMOs) ;Other forms of self and non-self-contained housing		
2		Fast-track route ;Section 73 applications					
3							
4							
5		Fast-track route			Houses in Multiple Occupation (HMOs)		
6							
7		Fast-track route					
8		Fast-track route ;Viability tested route ;Self-build and custom housebuilding ;Section 73 applications Viability tested route ;Section 73 applications ;Self-build and custom housebuilding ;Viability review mechanisms	I wonder whether hyperlinks can be added in these sections? E.g., 'The Southwark Plan 2022 policy P1 'Social rented and intermediate housing' sets out the Council's approach to viability' [hyperlink this text] - not sure if your document is working on the assumption that the reader already has this knowledge?  I wouldn't understand a thing if I don't google them myself.				Again, just wonder if hyperlinks can be added when references are made to specific policy? (Or will this over-complicate the document?)
9							
10		Fast-track route			Purpose-built student accommodation (PBSA)		
11	The collapse in the delivery of any form of housing is because of a combination of factors such as excessive demands for affordable housing, increased CIL (both Borough & Mayoral), and now Biodiversity Net Gain. There is only so much of these contributions that any scheme is able to support before it becomes unviable.	Fast-track route ;Viability tested route ;Section 73 applications ;Self-build and custom housebuilding ;Viability review mechanisms		See comments on the previous section			
12		Section 73 applications			Houses in Multiple Occupation (HMOs)		
13		Section 73 applications					
14		Self-build and custom housebuilding ;Viability review mechanisms			Other forms of self and non-self-contained housing ;Houses in Multiple Occupation (HMOs) Houses in Multiple Occupation (HMOs)		
15		Section 73 applications					
16					Purpose-built student accommodation (PBSA)		
17		Fast-track route					
18							
19	What incentives are there for developers to provide affordable housing?			Very difficult to follow if you are not a planner. Reading accessibility is dreadful. Why would anyone want to have a viability review mechanism if the fee can only go up?			
20							
21				This all seems straightforward to the general reader – which then actually makes me wonder whether it needs to be more detailed so that it provides more technical advice, as this is a very technical topic			

				There has been a big rise in student housing in recent years. This probably reflects the very loose current requirements for demonstrating the need for student housing. Given the pressing need for social rented housing, the SPD must state explicitly what evidence a developer wishing to build PBSA will need to provide.
22	PLEASE REFER TO THE TLS CONSULTATION RESPONSE LETTER SUBMIT BY EMAIL.	Viability tested route	Viability tested route: this section needs to explain more clearly what the developer will be need to provide for this route. The current wording is vague and could allow developers to get away with not providing clear and sufficient information.	Purpose-built student accommodation (PBSA)
23	THE COUNCIL'S EXPLANATION FOR EXCEPTIONAL CIRCUMSTANCES AND THEN CONSISTENT DECISION MAKING FOR ITS APPLICATION TO PAYMENT IN LIEU OF AFFORDABLE HOUSING IS CRITICAL TO ENABLE SUSTAINABLE DEVELOPMENT.			
24		Fast-track route ;Viability tested route ;Self-build and custom housebuilding ;Viability review mechanisms	Does not set out reasons Fast Track is 40% and Southwark AH policy is 35% and why not compliant with London Plan fast Track 35%. If an early-Stage review is 2 years, why do schemes that have been viability tested need a viability review mechanism if the scheme will take less than 2 years time to build out? No justification for this No details on public consultation requirements under 4.1 (fast-track). It is essential to maintain this so this route is not exploited by developers.	Council should be specific re "For smaller developments of 1-2 residential units, the council may impose a reduced time limit on implementing planning permission. This can remove the need for subsequent viability reviews as the timeframe of development is shorter" Why not just have no contribution and also no review for 1-2 schemes? Costs to produce viability studies, reviews and legal costs are expensive for the applicant and causes delays to the planning process. Has the Council empirical evidence to show that applying these reviews for small schemes are justified and not obstacles, that
25		Fast-track route		
26	The proposed payments in lieu are unreasonable and will ultimately result in developments being unviable and thus undeliverable. It is important that the Council recognise that current economic conditions remain challenging and all parties need to work together to support development and unlock barriers to delivery.			
27	It is noted that housing completions within London and Southwark are falling and below current and proposed housing targets. Urgent action is required if this trend is to be reversed. There is a real concern that these unreasonable financial contributions will act as a barrier to the delivery of			It should be noted that prior to the submission of an application a Registered Provider is not always on board as this process takes time so the requirement to provide details at the time of submission is unreasonable.

Regarding the statement that affordable housing should be delivered onsite 'unless off-site provision or an appropriate financial contribution in lieu can be robustly justified', we believe that it should be clearly detailed how 'robustly justified' is defined.

Moreover, for 100% or mainly single tenure schemes, we believe that it should be clarified that as much social rent should be delivered as possible. We further believe that it should be further clarified that as much affordable family housing should be built as possible, as this is where demand is highest and supply smallest.

28

We have concerns that the language regarding viability lacks detail and clarity.

We believe that it should be clarified that as any necessary viability reviews will ensure that there is the 'maximum viable amount' of affordable housing, that where it is viable to do so, there should be more than 35% of affordable housing.

We would also welcome further detail on what is required in a viability assessment. We would further welcome more clarity on what goes into viability considerations.

There is an increasing amount of purpose-built student housing. We also believe that the

REF	Do you think any of the following sections require further explanation?	If you selected a section or multiple sections, please tell us why	Do you have any further feedback on chapter 6 'Design and management of affordable housing'?	Do you think any of the following sections require further explanation?	If you selected a section or multiple sections, please tell us why	Do you have any further feedback on chapter 7 'Monitoring of affordable housing'?
1				Affordable Housing Monitoring Schedule (AHMS) and annual audit ;Legal agreements		
2						
3						Introduction repeats the last two sentences twice: "The Council uses legal agreements and an annual audit as part of the monitoring process. Monitoring also happens at certain trigger points of the development process."
4						
5	Registered Providers			Affordable Housing Monitoring Schedule (AHMS) and annual audit		
6						
7				Legal agreements		
8	Service charges		Service charges (and any other charges e.g., heating, cleaning of communal areas) should be included in the rent, it is a nonsense that these 'services' can become additional charges.			
9	Tenure blind design ;Mortgagee in Possession Clause (MiPC)					
10	Service charges			Affordable Housing Monitoring Schedule (AHMS) and annual audit		
11						
12	Registered Providers ;Service charges Mortgagee in Possession Clause			Affordable Housing Monitoring Schedule (AHMS) and annual audit		
13	(MiPC) Tenure blind design ;Mortgagee in Possession Clause					
14	(MiPC)			Affordable Housing Monitoring Schedule (AHMS) and annual audit		
15	Service charges			Legal agreements		
16	Registered Providers			Affordable Housing Monitoring Schedule (AHMS) and annual audit		
17						
18						
19			Please put the statement about quality of design near the front of the document as well, as this is very important	Legal agreements	It should be clear that developers cannot avoid participating in affordable housing and legal agreements will not support avoidance	
20						
21		The requirement for tenure-blind design should be extended to cover where affordable housing is located on the site, e.g. it should not be located solely in areas of the site which are likely to be noisiest.				No problems with what's being suggested – the issue in this area traditionally has been not so much the council's policies as its ability to enforce them
22	Tenure blind design					
23						
24						

25

Legal agreements

Readers need to understand financial penalties levied on developers who avoid performing their obligations with respect to affordable housing.

Service charges ;Tenure  
26 blind design  
27

Comments relevant to  
both these sections

Language used in reference to service charges should be strengthened to assure developers use the GLA Service Charge Charter. More detail is required in how developers should demonstrate 'high quality design' in building materials- can lessons from Grenfell be used here? Tenure blind design requirement has a strong positive impact for mental wellbeing.

We believe that the Service Charge Cap should be extended to all affordable housing tenures.

We believe that, unfortunately, it is still common practice for developers to exclude affordable housing tenants from facilities that may be deemed more luxurious, such as on-site gyms, because of a stated belief that affordable housing tenants may not want to pay the additional service charges. Therefore, we also believe that communal facilities should be defined to include all services.

We are concerned that developers may be putting social housing in

We are concerned that the monitoring of affordable housing is led by the information supplied by developers, which may lead to some developers being incentivised to not co-operate or mislead or lie. We believe that there should be more accountability and resources for properly checking developer-supplied information.

28

## **4.2 Appendix B: Full responses received via email**

Please note - email responses received on multiple SPDs are in a separate document.

**From:** [REDACTED]  
**To:** [planningpolicy](#)  
**Subject:** Affordable Housing SPD Consultation Response  
**Date:** 27 November 2024 14:10:18  
**Attachments:** [image001.jpg](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.jpg](#)  
[image006.jpg](#)  
[Southwark Affordable Housing SPD.docx](#)

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Dear Planning Team,

Please find attached our Affordable Housing SPD consultation response, please confirm receipt.

Best,

[REDACTED]



Southwark Law Centre, 14 -16 Hanover Park, Peckham, London, SE15 5HG. Peckham DX 34250  
Lewisham Law Centre c/o Citizens Advice Lewisham, Leamore Community Hub, Bonfield Road, London,  
SE13 5EU

Company Registration number 1418763 | Charity Registration No 277927 | VAT registration No 547 7812 10 |  
OISC reference number N201000009.

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## Southwark Affordable Housing SPD

### Preferred tenures:

- The preferred tenures should be changed:
  - Shared ownership shouldn't be supported anymore: the [House of Commons Parliamentary Report](#) in March 2024 found " *Shared ownership schemes are drastically failing to deliver an affordable route to homeownership for too many people and subject buyers to rising rents, uncapped service charges, and a disproportionate exposure to repair and maintenance costs*".
  - London Living Rent (an intermediate home ownership product): lower rent levels based on the ward, provides both low-rent and future low-cost purchasing. This should be stated as preferred over shared ownership.
  - Apart from LLR and Social Rent there are no other affordable rental products. There needs to be a
- Amendments to preferred tenures / clarification:
  - Social rent: the definition of social rent should be tightened to ensure it can not be replaced by 'social rent equivalent' or 'London Affordable Rent' tenures. The definition should make reference to the Regulator of Social Housing's [Rent Standard](#) and Guidance for Social Rent.
  - Council Housing: this should be added as an accepted and defined tenure that uses the definition: housing owned by the council, let on a secure tenancy, at the formula rents for set by the Regulator of Social Housing, according to their Rent Standard.
  - Key-worker housing set at LLR levels (maximum household income of £67,000): this isn't affordable for a teacher in Southwark.
  - London Affordable Rent (for low-incomes): The SPD states it is not supported as the rent levels aren't affordable in inner London but, this is incorrect. GLA website provides London-wide LAR levels which do not vary by borough and are lower than LLR and other discounted rental products. The council need to provide a robust reason for removing this tenure which could be an effective intermediate tenure to provide low-cost, discounted rent for households on incomes less than £67,000 – the income threshold for Key Worker Housing and London Living Rent.
  - The council should clarify an alternative discounted rent product that caters to incomes less than £67,000 (or £90,000 for Shared Ownership), this could be achieved through requiring LLR rental products at lower than maximum income levels. P1 *"Intermediate tenure homes should be suitable for households on a range of incomes. This may require a mix of shared ownership and other*

*intermediate tenure homes*" The SPD fails to provide clarity on any tenures that can meet a range between social rent and £67,000.

- CLT: this section should explain that CLT can be provided as a proportion of a private development (eg. the Aylesham Centre's site allocation for CLT provision under the intermediate offer), and explain how this is expected to work. CLTs form a relatively small part of affordable housing offers and can't be relied on as an affordable housing tenure for scaled-up delivery.
- Discounted market sale: the discount for this product is at least 20% below open market equivalent and therefore up to 80% of market rates and this is accepted as a preferred affordable housing tenure. However, the SPD, rightly, says that discounted market sale (up to 80% is not acceptable). The same approach should be applied to discounted market sale, either the minimum discount should be increased to at least 33% (so 67% of market sale value, in line with London Living Rent discounts) or removed as an acceptable tenure.
- 
- Intermediate products in general:
  - Should state preferences for different types in different situations
    - Note P1(1) states *"Intermediate tenure homes should be suitable for households on a range of incomes. This may require a mix of shared ownership and other intermediate tenure homes"* - need to detail here what is meant by this - and when the Council can/should refuse development (i.e. it should be explicit when 100% SO is not acceptable)
  - The SPD should provide indicative intermediary product percentages to encourage diverse intermediary AH products to be delivered. It should also explain in what circumstances developers can deviate from these indicative percentages (including what evidence is required).

#### Securing Affordable Housing (Chapter 3):

- 3.2: Should be delivered onsite '*unless off-site provision or an appropriate financial contribution in lieu can be robustly justified*'.
  - Robustly justified is not defined – could be done by defining circumstances in which this is allowed
  - States off-site must result in net gain of affordable housing units however there is no calculation or method to determine how this net gain will be reached.
- 3.4: 100% one tenure schemes:
  - This should more strongly emphasise the fact that 100% intermediate schemes are generally inappropriate if they are shared ownership.
  - Any attempts to deliver 100% intermediate must be balanced against the urgent need for social rent - this should be expressly stated. SPD

should state that deviation from the tenure split leading to no / low social rent is bad, and should only be accept in very exceptional circumstances

- Should make clear that as much social rent as possible should be delivered - need robust reasoning for why not
- This section should emphasize the need for family housing generally, and in particular the need for affordable family housing - any other identified need must be balanced against this
- The SPD should also provide further clarification about how the strategic target for 50% affordable housing will be met including how this applies to sites, particularly major applications.

#### Viability:

- Lacking detail and clarity:
  - Opening para should reference to draft LPG on viability
- Two main points of clarification required on the SP:
  - P1 states within 40%, minimum 25% should be Social Rent OR Council Housing and 10% should be intermediate.
    - Should clarify the additional 5% should be Council Housing
  - 4.2 - it is essential that this provides further clarification to the wording in P1(1)
    - Needs to clarify that provision of 35% does not in itself enough to satisfy the policy
    - Development must deliver the "maximum viable amount" - this means going above 35% where it is viable to do so and therefore starting planning applications from the minimum amount should not be appropriate.
- Requires further detail on what is required in a viability assessment
  - \*Should state that sales figures should factor in likely increase in sales costs based on similar developments in the area
- Should require publicity of full viability information from the outset
  - The Council's position of allowing only a summary until just before committee is illogical and unjustifiable
- 4.3 - the references to changing viability via s73 should be caveated - that generally this is not acceptable and only justified in exceptional circumstances / where exceptional reasoning can be provided
  - Should also make clear that if a s73 is proposed for another reason, there should be opportunity to reassess viability and consider enhanced delivery of AH
- \*Should include some reference to some sites having material considerations that require more affordable housing, or (e.g.) a higher amount of social rent / council housing / family affordable housing

- Socioeconomic context of an area should expressly create opportunity to push for more affordable housing
- PBSA:
  - Opportunity to require move to nomination schemes only to ensure delivery relates to specific need
  - Should provide more detail and guidance on viability testing for PBSA – for instance, what is compliant and not compliant?

#### Co-living

- AH delivery is required but, unclear as which approved tenure or how maintenance of this is required – this should be clarified and Policy P1 applied.

#### Registered Providers:

- Should require further market testing particularly for smaller number of units to encourage smaller RPs to take on units and when trying to establish demand

#### Design and management of affordable housing:

- Service charges:
  - The SPD should extend the Service Charge Cap to *all* affordable housing tenures
  - In terms of access to services and service charges, we appreciate the reference at 6.3 to tenants having “equal access to communal facilities”, but we note it is still common practice for developers to exclude affordable housing tenants from more “luxury” additional facilities and services (e.g. on-site gym), justifying this on the basis that such tenants will not want to pay an additional service charge. This point should be expressly acknowledged – potentially by defining communal facilities to make clear it includes all services.
- Tenure blind design:
  - Should include location of the block in larger developments – for instance, not putting social housing in high air and noise pollution areas

#### Monitoring

- References annual audit, but this hasn't occurred since 2022 and current audit is unsatisfactory
- AHMS - this is "mandatory template which developers are required to complete" every year, secured via s106
  - But what if developers don't comply?
- Process is led by developers supplying information - inherently flawed as developers incentivised to lie / not cooperate, and little ability to properly check

**From:** [REDACTED]  
**To:** [planningpolicy](#)  
**Cc:** [REDACTED]  
**Subject:** Affordable Housing SPD response  
**Date:** 25 November 2024 14:15:23  
**Attachments:** [Southwark affordable housing SPD Reps.pdf](#)

---

Good afternoon

Please find attached our response to the Draft Affordable Housing SPD consultation.

Kind regards,

[REDACTED]

[REDACTED]

**Pocket Living**

Tower House  
10 Southampton Street  
London WC2E 7HA

d 020 3972 9573

w [www.pocketliving.com](http://www.pocketliving.com)

**AWARDS**

2024 EVENING STANDARD NEW HOMES AWARDS – Forest Road E17

2024 RESI AWARDS – Best Small Developer (Highly Commended)

2022 PLANNING AWARDS – Gardner Close E11

2021 EVENING STANDARD NEW HOMES AWARDS – Varcoe Road SE16

2021 PLANNING AWARDS – West Green Place N17

Please consider the environment before printing this email.

CONFIDENTIALITY NOTICE: This message is private and confidential. If you have received this message in error please notify us and remove it from your system.

Pocket Living Limited is registered in England & Wales. Registered Office: Tower House, 10 Southampton Street, London, WC2E 7HA. Registered No.: 4538848.



Southwark Affordable Housing SPD

Dear Sir/ Madam

Pocket Living is pleased to enclose its comments on the draft Affordable Housing SPD.

### **About Pocket Living**

Pocket Living ('Pocket') is an innovative award-winning SME developer established in 2005 to deliver discounted affordable homes for eligible first-time buyers. Pocket provides high quality carefully designed, space standards compliant 38sqm one-bed intermediate affordable homes to households who cannot afford to buy a good quality home but would also not be eligible for social housing. These households typically include front-line key workers who are essential to local communities.

Pocket's discounted homes meet the statutory definition of affordable housing set out in Annex 2 of the National Planning Policy Framework (NPPF). Planning agreements ensure that Pocket affordable homes are provided at a 20% discount to open market values and are reserved for eligible purchasers who live or work locally and do not own their own home. Unlike Shared Ownership, covenants in the lease ensure that the homes remain affordable in perpetuity, helping future generations. Pocket also manage resales to ensure homes always go to other eligible local first-time buyers (earning below the relevant local income threshold) who will benefit most from them and monitors occupation to ensure they are not sublet for profit.

A specialist in small and complex sites, Pocket is known for the delivery of well-designed homes using modular technology. The homes that Pocket builds stay affordable forever and so are designed for the long term with lasting quality. Pocket takes a design-led approach, as evidenced in winning this year's Evening Standard Best First-Time Buyer award. Pocket also encourages a sense of community amongst its residents, starting with welcome drinks and aided by communal spaces such as roof terraces and co-working rooms.

Pocket is the UK's only development business focused on delivering grant free discounted affordable homeownership for first-time buyers.

Pocket has delivered over 1,100 homes across the Capital and has over 1,500 more in planning and construction. The homes are popular with first-time buyers and currently Pocket has a list of over 18,000 Londoners who have expressed an interest in buying a Pocket home in the next 12 months. The average annual income of a buyer is less than c.£40k. The average age of a Pocket buyer is 32 and 90% are single; 40% of Pocket buyers to date have been Key Workers.

In 2019, Pocket delivered its only scheme to date within Southwark. Our Varcoe Road scheme priced in 57 local first-time buyers living or working in the borough who would have been otherwise unable to afford on the open market.



Pocket offers an alternative to Shared Ownership which has a relatively high cost for a low percentage ownership and no control over additional costs such as service charges, which can easily spiral. Pocket instead gives control to residents via a Residents Management Company to set their own service charges and we also design our building with long-term affordability as a key consideration.

In light of the growing unaffordability of housing for young people in London, Pocket has, for the first time, expanded into the rental sector. In 2023, we completed our first purely discount market rent development in Kings Cross (60 rental homes with a 20% discount).

The model combines Pocket 1-bed homes (as affordable DMR housing) with 3-Bed homes known as Pocket Sharers, which are rented by the bedroom on an individual tenancy basis, but the occupants share the kitchen and living spaces within each apartment. Each Sharer tenant has security of tenure and can stay as long as they want to: they do not have to move, find a new flatmate or cover void costs if their flatmate leaves. The two different unit types are pepper-potted within a Pocket Rent building, under the same institutional grade management.

## Response to specific issues within the draft SPD

### 1. Affordable Housing Definitions

#### a. Discount Market Sale ("DMS")

We welcome the inclusion of Discount Market Sale housing as genuinely affordable in the draft SPD. The SPD should be clear that the threshold should be the London Plan AMR threshold for Discount Market Sale (currently £90,000).

#### b. Discount Market Rent ("DMR")

We strongly disagree with DMR (housing for rent at least 20% below open market equivalent) not being accepted as genuinely affordable housing in the draft SPD.

Removing DMR from the Draft SPD conflicts with the NPPF, London Plan (2021) and Southwark Plan (2022) policies (policies P1 and P4).

The NPPF (Annex 2) defines Affordable housing as including:

- (a) *Affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Social Rent or Affordable Rent, or is **at least 20% below local market rents (including service charges where applicable)**; (b) the landlord is a registered provider, **except where it is included as part of a Build to Rent scheme** (in which case the landlord need not be a registered provider); and (c) it includes provisions to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. **For Build to Rent***



*schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent).*

(emphasis added)

The London Plan Policy H11 states:

- (a) *Where a development meets the criteria set out in Part B, the affordable housing offer can be solely Discounted Market Rent (DMR) at a genuinely affordable rent, preferably London Living Rent level. DMR homes must be secured in perpetuity.*

Southwark Plan Policy P1 states:

*"Southwark prioritises London Living Rent, or a **Discount Market Rent** equivalent to London Living Rent, as an intermediate rent product."*

The Fact Box in the policy states:

*"Intermediate housing includes 'low cost home ownership' products and '**Discount Market Rent**' products."*

Southwark Plan Policy P4 states:

*"**Discount Market Rent** homes must be allocated in accordance with Southwark's Intermediate Rent Housing Policy,...*

*The policy applies to larger- scale development (schemes providing 100 homes or more) because larger schemes are best placed to provide a high-quality rental offer to tenants renting privately and tenants in **Discount Market Rent homes**".*

The policies in the Southwark Plan therefore support DMR as an acceptable form of intermediate affordable housing, in line with the NPPF and Local Plan. The Affordable Housing SPD should follow suit.

### **Affordability**

It is acknowledged that the Southwark Plan expects DMR to be equivalent to LLR. The average monthly LLR rent in Southwark and the Southwark household income it is affordable to (based on rent being 28% of gross income) is set out below:

	PCM	Income Required
1 bed	£1185	£50,785
2 bed	£1313	£56,271
3 bed	£1430	£61,286



The latest London Plan AMR states that for rents to be genuinely affordable they should be affordable to incomes of £67,000 or less; which the above LLR rents sit comfortably below.

Defining DMR homes as “not genuinely affordable” means that the needs of many local households, earning median full time wages, who are otherwise unable to afford to buy a home, but would not be eligible for social/ affordable rented housing (meeting an unmet intermediate affordability gap). The households priced out under the proposed affordable housing SPD are illustrated in the table below:

	Income range with no affordable rented provision under the proposed SPD
1 bed	£50,785 - £67,000
2 bed	£56,271 - £67,000
3 bed	£61,286 - £67,000

Moreover, page 110 of the Southwark Plan shows that DMR homes serve a range of incomes in the Borough from £20,000 - £60,000. This range of household incomes makes up 50% of the households in Southwark. The latest London Plan AMR threshold for intermediate rent increased to £67k earlier in 2024; suggesting DMR homes within the AMR cap would now serve more than 50% of Southwark households. This reinforces that DMR products should not be limited just to Social Rent Equivalent and LLR equivalent rents as this excludes a significant proportion of working Londoners.

## Impacts

As explicitly recognised in the London Plan, Build to Rent operates a different model to Build for Sale. It is for this reason that the BtR policies have been developed following significant industry consultation to enable the affordable housing offer in a Build to Rent scheme to be entirely DMR. DMR therefore needs to be accepted as genuinely affordable in Southwark’s SPD if the Borough wishes to continue to facilitate the much needed BtR sector in the Borough.

Requiring deeper rental discounts, below LLR equivalent, will hinder the financial viability of BtR schemes and at a minimum (1) reduce the total quantum of affordable housing being delivered in the borough and (2) in more extreme circumstances jeopardise the deliverability of both affordable and private homes worsening the crisis in the rental market. BtR is founded on the principle of single ownership and management. Therefore, low cost rent would in this instance be provided by a subsidiary For Profit RP not a third party RP to ensure that buildings are not in split ownership. Low cost rent is best provided as a product by RPs given the additional support that low cost rent customers can often need.



Making it obligatory for BtR schemes to provide DMR at social rent equivalent levels should be avoided. The BtR product should instead be used for what it is excellent at - delivering a combination of OMR and DMR in true tenure blind communities.

## **2. 100% or mainly single tenure schemes (Section 3.4)**

The Council is seeking to limit applications that are predominately affordable housing or 100% affordable housing; in favor of schemes that meet the tenure split between social rent and intermediate set out in Southwark Plan Policy P1.

Whilst the SPD drafting does not preclude schemes with alternative tenure splits coming forward; it makes this increasingly challenging and it is proposing an approach that contradicts London Plan Policy H5(d).

London Plan Policy H5(D) states:

*"Developments which provide 75 per cent or more affordable housing may follow the Fast Track Route where the tenure mix is acceptable to the borough or the Mayor where relevant."*

The supporting text states:

*"To incentivise schemes with a high proportion of genuinely affordable housing, schemes that propose 75 per cent or more genuinely affordable housing may be considered under the Fast Track Route whatever the affordable housing tenure mix, where supported by the borough and, where relevant, the Mayor".*

The additional policy tests in the SPD does not conform with the London Plan. In accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012; Supplementary Planning Documents do not form part of the development plan, they cannot introduce new planning policies into the development plan. We therefore strongly object to the imposition of additional policy tests and instead propose the SPD should be bought back in line with the London Plan.

### **Impacts**

Key to the delivery of Pocket's developments of DMS is that all or the majority of the homes are delivered as 100% DMS. Due to a combination of site specific constraints and financial viability our schemes are unable to support multiple affordable housing tenures.

DMS homes play a small but important role in helping Londoners on to the housing market and should continue to do so.

The draft SPD is not clear about when the provision of 100% affordable housing in a single tenure is acceptable. Without clarity on this point, developers will be deterred from bringing forward 100% affordable housing schemes. Pocket will not be able to seek land opportunities in the Borough for 100% discount market sale schemes as

there will be too much risk in the planning process without clarity on the circumstances in which 100% affordable housing schemes are acceptable.

The requirement of a viability assessment for schemes that are providing 100% affordable housing will deter these schemes coming forward as this introduces too much uncertainty and risk into the planning process. If the Borough wants to encourage large amounts of affordable housing, this requirement should be removed from the SPD and clarity on the circumstances where 100% affordable housing schemes are acceptable should be provided.

This would help provide clarity that schemes providing 100% genuinely affordable housing (such as Discount Market Sale) will be supported by the Borough.

### **3. Houses in Multiple Occupation (Section 5.2)**

Section 5.2 of the SPD states:

*"HMOs are liable for contributions towards affordable which can be provided as a financial payment. HMOs are not expected to deliver affordable housing on or off-site as expected from larger developments. HMOs must submit a viability assessment to justify the maximum viable approach has been taken (see section 4 of this SPD). This is in accordance with policy P9 and P1"*

The Pocket Rent model described earlier is unique. It provides a mixture of on-site Discount Market Rent affordable homes alongside 3-bedroom homes designed for sharers, offering a professional and high-quality alternative to traditional HMOs. This unique BtR product offers a range of homes to different incomes and levels of affordability within a single scheme.

New developments of flats such as Pocket Rent, which require a C4 use for the flats designed for sharers would be classed as HMOs.

We would recommended Section 5.2 is updated to recognise that C4 use class can be provided as a professionally managed part of a wider BtR scheme while also providing Discount Market Rent affordable housing on-site.

Notwithstanding, our position that as per Point 1 remains that Discount Market Rent definitions should accord with the NPPF and London Plan.

### **4. Registered providers and Other Affordable Housing Providers (Section 6)**

The draft SPD states

*"social and intermediate housing can be delivered by bodies known as Registered Providers (RPs)."*

It goes on to say:



*"Other Affordable Housing Providers that are not on our list of RPs will need to be approved by the council in writing."*

Affordable Housing Providers are defined as

*"Bodies which own and manage affordable housing. These could include registered providers and specialist private affordable housing managers."*

As it is not a requirement to be a local authority or a Registered Provider to deliver or manage intermediate rented homes that are delivered without grant, these units within a Build to Rent scheme can be owned and/or managed by Build to Rent landlords themselves.

The SPD should reflect the ability of Build to Rent schemes to provide affordable housing therefore BtR operators should not need to be approved by the council in writing. Requiring Southwark's approval for BtR operators to provide affordable housing does not accord with the London Plan and introduces an extra barrier to BtR developments in Southwark.

**From:** [35% Campaign group](#)  
**To:** [planningpolicy](#)  
**Subject:** Comment on draft Affordable Housing SPD  
**Date:** 26 November 2024 09:30:25  
**Attachments:** [Comments on the Draft Affordable Housing SPD July 2024 261124.docx](#)

---

Dear Planning Policy

Please find attached our comments on the draft Affordable Housing SPD.  
We would be grateful if you would acknowledge its safe receipt.

Regards



35% Campaign

## 35% Campaign

### Chapter 2. Affordable Housing Definitions

1 We have doubts about the utility of the following types of intermediate housing, listed as acceptable in Table 1 Genuinely Affordable Housing - London Living Rent (LLR), Key worker housing, Community Land Trusts (CLTs) and Discount market sale (DMS).

2 London Living Rent is *'a type of intermediate affordable housing for middle-income Londoners who want to build up savings to buy a home through shared ownership. London Living Rent provides high quality rented homes on stable tenancies, with rents based on a third of local household incomes. Money you save on rent can go towards a deposit for your own home'* (from GLA website). A 2017 [London Tenant's Federation Briefing](#) on affordable housing, notes that rents can be up to 80% market rents, but averaged 67%. Rents at this level do not leave much headroom for savings towards mortgages.

3 Eligibility for Key worker housing is based on employment status rather than housing need. The tenancies are 2-5 years and the rents are at the maximum London Living Rent level. We think key workers would be better served by greater provision of more secure and lower-cost affordable housing of other types.

4 Community Land Trusts (CLTs) *'are non-profit organisations that own and develop land for the benefit of the community.'* The SPD states what is desired (affordable housing in perpetuity), but is vague as to who will provide this and how it will be achieved. Notwithstanding examples of successful CLTs, we do not believe that CLTs can make any large contribution to affordable housing in the borough.

5 Discounted market sale (DMS) should be *'at least 20% below open market equivalent. The discount should be sufficient to ensure the homes are affordable or accessible to those with household incomes within the GLA thresholds'*. In other words, rents can be up to 80% market price. The SPD does not accept Affordable rent and Discount market rent, at similar discount levels, because Southwark does not consider it to be *'genuinely affordable'*. We cannot see why DMS, which has a similar low discount, is not also unacceptable.

6 We note that Discount market rent (DMR) is allowed for Build to Rent *'at social rent equivalent'* levels, despite the SPD saying that it otherwise unacceptable (5.30).

### Council housing

7 Council Housing should be included in the SPD's Table 1 Genuinely affordable housing, as a third type of acceptable affordable housing. Council Housing would be defined as housing owned by the council, let on a secure tenancy, at the formula rents for set by the Regulator of Social Housing, according to their Rent Standard.

8 Council housing is needed because the direct delivery of council housing by Southwark Council has been paused and the Council is now relying on partnerships with developers for progress on its council house building programme ; it is therefore appropriate that Council Housing should be included in the SPD, which provides guidance for private developments.

9 The required level of council housing on such developments should be set at 50%. This is both the Mayor's and Southwark's strategic target for affordable housing. We also note that 50% affordable housing was an aspiration of the 2008 Affordable Housing SPD, and there has been little progress in achieving this since. Council housing should also now be the preferred tenure as the most secure kind of affordable housing.

**Social rented housing** (Glossary pg 41).

10 The draft definition of Social rented housing is too loose and would allow social rent to be substituted by Affordable Rent.

11 The SPD says that Affordable Rent is unacceptable, because is *'not genuinely affordable for Southwark residents. Therefore, the Council does not accept Affordable Rent as social rented or intermediate housing'*.

12 The draft definition says *'Housing that is available to rent either from the Council, a registered provider, or another affordable housing provider. Social rented housing is set at an affordable rent based on local incomes'*. This should be replaced with a more accurate definition, which has reference to the Regulator of Social Housing's [Rent Standard](#) and Guidance for Social Rent. It should also explicitly exclude Affordable Rent. reiterating that it is not accepted as a social rent.

END

**From:** [REDACTED]  
**To:** [planningpolicy](#)  
**Subject:** Re : affordable housing  
**Date:** 23 August 2024 13:52:06

---

Good afternoon

I would like to say we are in need of more 4 and 5 bedroom houses and/or flats in Southwark. For last 2 months there has been 0 4 bedroom properties .

I feel if more 4 and 5 bedroom were built then this would free up some 1 , 2 and 3 bedrooms. We don't need no more 1 or 2 bedroom built.

Just suggesting

Kind regards

[REDACTED]



## 4.3 Appendix C: Emails publicising consultation

4.3.1 Email sent to planning policy mailing list on 22<sup>nd</sup> August 2024 announcing start of public consultation.

### Share your views on planning policy documents

Southwark Council is consulting on four supplementary planning documents (SPDs):

- Householder Development SPD
- Climate and Environment SPD
- Section 106 and Community Infrastructure Levy SPD
- Affordable Housing SPD

#### What are Supplementary Planning Documents (SPDs)?

Supplementary planning documents (SPDs) provide additional guidance on existing policies in an adopted local plan.

They are a material consideration in the decision-making process. This means the council will consider the guidance within an SPD when assessing and determining a planning application.

SPDs cannot be used to introduce new planning policies.

#### How can I comment?

Click on the link below to visit the consultation website and share your views:

[Supplementary Planning Documents \(SPDs\) Consultation](#)

Consultation is open until **Wednesday 27<sup>th</sup> November 2024**.

Email [planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk) with any queries about how to comment.

4.3.2 Email sent to community engagement mailing list on 23<sup>rd</sup> August 2024 announcing start of public consultation.

### [Share your views on planning policy documents\\*](#)

Southwark Council is consulting on four supplementary planning documents (SPDs):

- Householder Development SPD
- Climate and Environment SPD
- Section 106 and Community Infrastructure Levy SPD
- Affordable Housing SPD

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#### How can I comment?

Click on the link below to visit the consultation website and share your views:

[Supplementary Planning Documents \(SPDs\) Consultation](#)

Consultation is open until **Wednesday 27<sup>th</sup> November 2024**.

Email [planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk) with any queries about how to comment.

4.3.3 Email sent to planning policy mailing list on 18<sup>th</sup> October 2024 publicising consultation events.

## 6 weeks left to share your views on planning policy documents

Southwark Council is consulting on four supplementary planning documents (SPDs):

- Householder Development SPD
- Climate and Environment SPD
- Section 106 and Community Infrastructure Levy SPD
- Affordable Housing SPD

## Upcoming public consultation events:

- **Tuesday 29<sup>th</sup> October:** 6pm – 8pm Southwark Council Offices, 160 Tooley Street, SE1P 5LX

Click on the [link](#) to register attendance.

- **Saturday 2<sup>nd</sup> November:** 10am - 12pm Peckham Library, 122 Peckham Hill Street, SE15 5JR

Click on the [link](#) to register attendance.

### What are Supplementary Planning Documents (SPDs)?

Supplementary planning documents (SPDs) provide additional guidance on existing policies in an adopted local plan.

They are a material consideration in the decision-making process. This means the council will consider the guidance within an SPD when assessing and determining a planning application.

SPDs cannot be used to introduce new planning policies.

### How can I comment?

Click on the link below to visit the consultation website and share your views:

[Supplementary Planning Documents \(SPDs\) Consultation](#)

Consultation is open until **Wednesday 27<sup>th</sup> November 2024**.

Email [planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk) with any queries about how to comment.

### 4.3.3 Email sent to those who have applied to the council for planning permission in the last 12 months on 23<sup>rd</sup> October 2024 publicising industry event.

Dear all,

You are invited to an event to find out more about Southwark Council's current [Supplementary Planning Documents \(SPDs\) consultation](#).

This event is aimed at planning agents, developers and those in the planning professions.

Council officers will give a brief presentation on the SPDs and take questions and feedback on the consultation from attendees.

#### **Event details**

When: Tuesday 5th November, 2pm - 4pm

Where: Southwark Council offices, 160 Tooley Street, London, SE1P 5LX.

You must register your attendance [here](#).

Please limit attendance to one representative from your organisation as capacity is limited.

#### **What are we consulting on?**

Southwark Council is consulting on four SPDs:

- Householder Development SPD
- Climate and Environment SPD
- Section 106 and Community Infrastructure Levy SPD
- Affordable Housing SPD

Consultation is open until **Wednesday 27th November 2024**.

You can view the SPDs and the public consultation website [here](#).

Responses to the consultation should be submitted via the consultation website.

#### **Further information**

Email [planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk) with any queries about the event or the consultation.

Register for a [MySouthwark](#) account to stay informed about the public consultation and future planning policy updates. You can also 'follow' the progress of the SPDs through the public consultation [website](#).

4.3.3 Email sent to planning policy mailing list on 20<sup>th</sup> November 2024 with a reminder of one week left of consultation

## **1 week left to share your views on planning policy documents**

Southwark Council is consulting on four supplementary planning documents (SPDs):

- Householder Development SPD
- Climate and Environment SPD
- Section 106 and Community Infrastructure Levy SPD
- Affordable Housing SPD

### **What are Supplementary Planning Documents (SPDs)?**

Supplementary planning documents (SPDs) provide additional guidance on existing policies in an adopted local plan.

They are a material consideration in the decision-making process. This means the council will consider the guidance within an SPD when assessing and determining a planning application.

SPDs cannot be used to introduce new planning policies.

### **How can I comment?**

Click on the link below to visit the consultation website and share your views:

[Supplementary Planning Documents \(SPDs\) Consultation](#)

Consultation is open until **Wednesday 27<sup>th</sup> November 2024**.

Email [planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk) with any queries about how to comment.

#### 4.4 Appendix D: Press notice

The press notice was published in Southwark News on 12<sup>th</sup> September 2024.

##### **Southwark Council Public Consultation: Planning Policy Supplementary Planning Documents (SPDs)**

Southwark Council is consulting on four supplementary planning documents (SPDs):

- Householder Development SPD
- Climate and Environment SPD
- Section 106 and Community Infrastructure Levy SPD
- Affordable Housing SPD

This consultation provides the opportunity for you to share your views on emerging planning policy in Southwark. The guidance in the SPDs will become part of the council's decision making, helping to shape future development in the borough.

How can I comment?

Click on the link below to visit the consultation website and share your views:

Supplementary Planning Documents (SPDs) Consultation

Consultation is open until Wednesday 27th November 2024.

Email [planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk) with any queries about how to comment.

##### What are Supplementary Planning Documents (SPDs)?

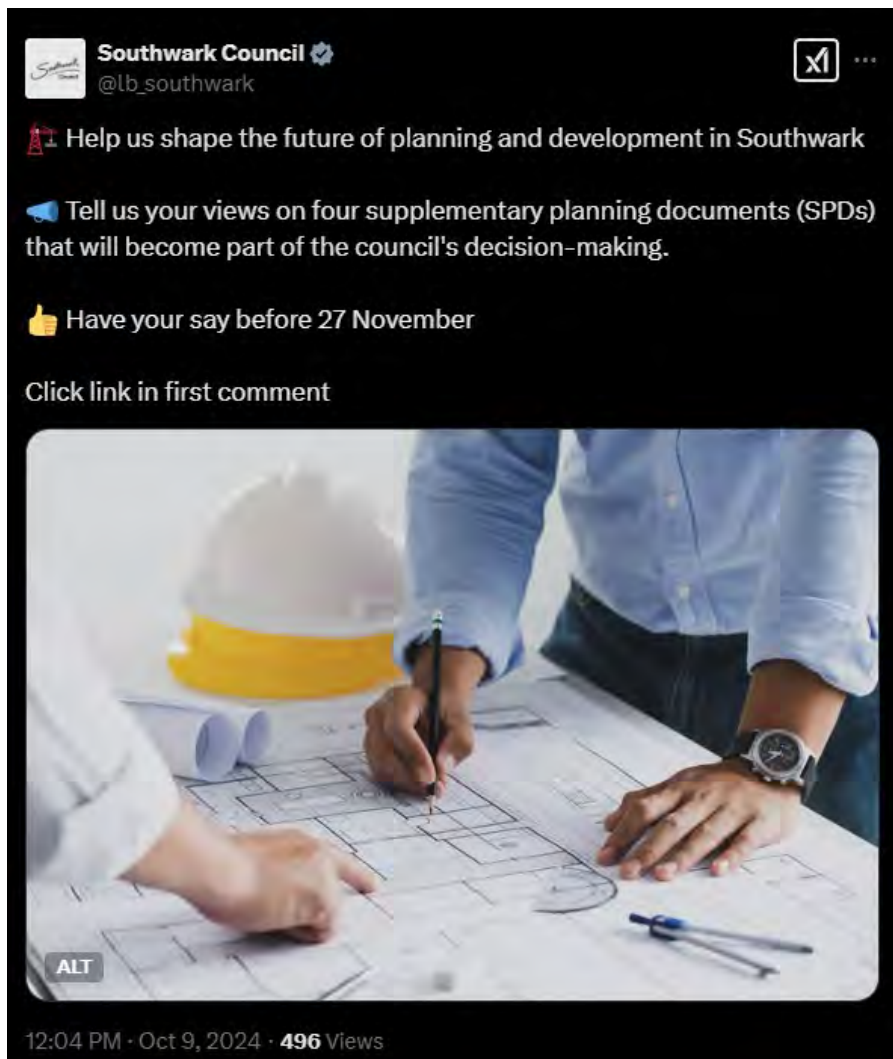
Supplementary planning documents (SPDs) are a material consideration in the plan-led decision-making process. This means the council will consider guidance within an SPD when assessing and determining a planning application.

SPDs cannot be used to introduce new planning policies and instead provide additional guidance on existing policies in an adopted local plan.

The adopted local plan for Southwark is the [Southwark Plan 2022](#). It was adopted by the Council Assembly on 23 February 2022. It sets out the vision, strategic objectives, and planning policies for development in Southwark for the period 2019 to 2036.

The Southwark Plan 2022 is in conformity with the broader guidelines and policies set out in the [London Plan 2021](#) and the [National Planning Policy Framework \(NPPF\) 2023](#).

#### 4.5 Appendix E: Example X / Twitter post





## 4.6 Appendix F: Leaflets promoting consultation

HOUSEHOLDER DEVELOPMENT

S106 & COMMUNITY INFRASTRUCTURE LEVY

TELL US YOUR THOUGHTS ON SOUTHWARK'S  
**Supplementary Planning Documents**

SPDs provide extra guidance on policies in our local plan.

Scan the QR code to find out more and share your views.

AFFORDABLE HOUSING

CLIMATE & ENVIRONMENT

*Southwark*  
Council  
southwark.gov.uk

**Southwark Council is consulting on four supplementary planning documents (SPDs):**

<b>HOUSEHOLDER DEVELOPMENT SPD</b>	<b>CLIMATE AND ENVIRONMENT SPD</b>	<b>SECTION 106 AND COMMUNITY INFRASTRUCTURE LEVY SPD</b>	<b>AFFORDABLE HOUSING SPD</b>

The guidance in SPDs helps the council make planning decisions.  
SPDs do not introduce new planning policies.

**Share your views**

Consultation is open until **Wednesday 27th November 2024**.  
Email [planningpolicy@southwark.gov.uk](mailto:planningpolicy@southwark.gov.uk) with any queries about how to comment.

*Southwark*  
Council  
southwark.gov.uk