

Simon Bevan
Director of Planning

Sadiq Khan (Mayor of London)
New London Plan
GLA City Hall
London Plan Team
London
SE1 2AA

Dear Mr Khan,

Thank you for the opportunity to respond to the draft new London Plan. In broad terms the council welcomes the Plan and is committed to work closely with the Mayor to ensure its successful delivery. This notwithstanding, the council has significant concerns about some aspects of the Plan. The council's overarching observations are summarised below and detailed comments are set out in Appendix A. The council's officers would be happy to meet the Mayor's officers to discuss comments in further detail where this would be constructive. The council would like to participate in the Examination in Public.

As a general observation, whilst we welcome many of the strategic policies in the new London Plan, the council questions the level of detail contained in some policies. The council considers some of the policies and information set out in the new London Plan too detailed to be part of a strategic London-wide plan. It would be more appropriate for boroughs to develop detailed planning policies to respond to local issues.

Development on Strategic Industrial Land

Southwark Council strongly support the Mayor's objective to increase housing delivery across London. The council is committed to maximising housing delivery on all suitable brownfield sites and has worked to identify strategic development sites through the preparation of its Local Plan and by bringing forward area action plans covering its opportunity areas. In particular, the council is planning to bring forward 20,000 new homes, including at least 7,000 new affordable homes, in the Old Kent Road Opportunity Area. This will be achieved through exploiting the opportunities provided by the extension of the Bakerloo line.

The Old Kent Road Opportunity Area is currently home to much of Southwark's Strategic Protected Industrial Land. The draft Area Action Plan/Opportunity Area Planning Framework (AAP/OAPF) sets out an approach to development that will rationalise this strategic land to ensure capacity is maintained whilst opportunities for new homes and new employment uses are successfully integrated within the network of industrial uses. Through close collaboration with the Mayor the

council understands this approach is mutually favoured. However, the council is concerned the new London Plan approach to industrial land may serve to frustrate these shared objectives.

Specifically, the council is concerned policies E4-E7 are incoherent and mutually incompatible. Policy E4 sets out the role of Strategic Industrial Locations (SIL), Locally Significant Industrial Sites (LSIS) and non-designated industrial sites and clearly identifies industrial and related functions for SIL in part A. Figure 6.2 identifies the areas that are classified as SIL. For Southwark this is Area 1 - the Bermondsey, Old Kent Road and Surrey Canal Central Services Area identified in Table 6.3. However, part C cross-references Policy E7 relating to SIL consolidation to support the delivery of residential and other uses allowing for some SIL release (illustrated in Figure 6.3). It is clear this can only be done through a plan-led process.

Most of the current adopted SIL land in Southwark in Area 1 is within the Old Kent Road opportunity area. The AAP/OAPF sets out a plan-led approach for the re-designation of some areas of SIL to mixed use neighbourhoods. Retaining industrial capacity (as required in Table 6.2) is a key part of the masterplanning in relation to mixed-use development.

Southwark's approach in the AAP/OAPF is to clearly define the areas that are retained as SIL (for the uses identified in E4 Part A and E5 Part C only) and a strategy for intensification for these areas (consisting of 26 hectares) is planned, which is consistent to some extent with Policy E7 regarding making more efficient use of industrial sites for industrial uses only.

Whilst the AAP/OAPF requires mixed-use development on the remainder of the sites currently adopted as SIL, this is proposed with the intention to continue maintaining employment floorspace, including industrial uses, in an innovative new approach to mixing uses. Whilst the London Plan acknowledges local plan-led approaches to SIL consolidation, it is considered that it is not possible to designate Area 1 as SIL as this would need to comply with the uses identified in Part A of E4 and Part C in Policy E5. Whilst Policy E5 Part D does make an exception to refusing residential development and other uses in areas of SIL consolidation through the plan-led process, continuing to designate SIL in areas identified for SIL consolidation or locally led plan masterplanning, would appear to put these policies in conflict with each other. It would not be possible to designate SIL for particular uses not including residential development, but then also require 50% affordable housing delivery on these sites as required by Policy H6.

The council strongly recommends Area 1 should not be identified as SIL in its entirety as this is in conflict with the plan-led approach to change and consolidation as supported by the policies. It is suggested Area 1 could continue to be identified for the industrial property market area designation: 'Central Services Area' but acknowledge that the required retention of industrial capacity will be accommodated in smaller areas of SIL intensification as well as through mixed use development. This is in acknowledgement of the opportunity area status of Area 1 which is at an advanced stage of AAP/OAPF plan preparation and is expected to deliver significant growth in housing in addition to a range of complementary uses to support transformation of the area facilitated by the Bakerloo line extension.

Old Kent Road Opportunity Area

The new London Plan should embed the shared aspirations of the council and the Mayor in the plan. It is important that the key development targets for the area reflect those being brought forward in the Old Kent Road AAP/OAPF. Specifically, Figure 2.4 indicates the development capacity of the Old Kent Road Opportunity Area as 12,000 homes and 5,000 jobs. This is in contrast to the capacity indicated in the AAP/OAPF for 20,000 homes and 10,000 additional jobs which has been derived following extensive and detailed modelling.

Town centre hierarchy

The council is concerned the new London Plan classifies Canada Water as a district town centre. Canada Water town centre was designated a major town centre through Southwark's Core Strategy in 2011, a designation carried forward into the Canada Water AAP (2015). Canada Water currently has 37,000sqm of retail floorspace and is anticipated to grow by a further 35,000sqm. There are already a number of commitments in the planning pipeline (approximately 20,000sqm of retail floorspace) and a strategic planning application for the majority of the town centre redevelopment is being prepared by British Land. It is recommended Canada Water is reclassified as a major town centre to align with adopted local policy acknowledging the existing offer and growth potential of this significant town centre.

Regarding Old Kent Road, on which the new London Plan designates two district town centres, the council considers this represents an inopportune approach to realising the regenerative opportunities being harnessed through the preparation of the Old Kent Road AAP/OAPF. The designation of two district town centres undermines the council's strategy for the future development of the town centre and conflicts with the town centre policy set out in the new London Plan.

The new London Plan states that for areas which currently contain retail parks with car parking, a strategy should be developed to facilitate a broader mix of town centre uses and retail formats, a reduction in car travel and the promotion of safe and welcoming places to visit and spend time. The Old Kent Road is a large opportunity area that currently hosts 95,000sqm of retail floorspace; it contains traditional high street shops as well as large retail parks. The draft AAP/OAPF sets out this strategy clearly for Old Kent Road, demonstrating the existing areas of the linear high street and how this can be developed further to achieve a revitalised high street, interspersed with green spaces, along the entire length of the road. Whilst there are minor stretches of established set-back residential frontages on one section, which is only on one site of the road, this is not uncommon in town centres. It is requested the new London Plan reflects the council's approach to the designation of Old Kent Road as a major town centre.

A further concern is that the new London Plan overlooks Herne Hill town centre entirely. Herne Hill is a designated district town centre in both Southwark and Lambeth adopted policy. It is requested the London Plan reflects this.

Increasing housing supply

The council supports the Mayor's aspirations to deliver the homes London needs. However, in light of central government's planned 'housing delivery test', the council is concerned the Mayor's borough-level housing delivery targets simply reflect assessed development capacity and do not account for market capacity. Despite consistently granting permission for more homes than Southwark's housing target there has been a consistent and sustained shortfall between the number of homes permitted and the number of homes built. The reasons for the 'permissions gap' are varied and complex. However, many of the reasons are outside the council's control. For example, a significant proportion of Southwark's housing pipeline is on sites which are actively in use. Once permission is achieved a developer must first successfully achieve vacant possession before works can begin. The council is concerned that the inclusion of housing delivery targets which dwarf actual housing delivery rates could effectively place the council on an accelerated path to fail the government's housing delivery test.

The council has a strong track record of granting planning permission for homes and encouraging development to take place. Southwark granted consent for 20,022 gross new dwellings between 2012 and 2017. Over the same period 8,961 dwellings were completed demonstrating the determination of the council to make delivery happen but also the challenge to close the gap with approvals. Of those completions 2,562 were affordable homes, the third highest total of all London boroughs. In 2016/17 alone [412 social rented units were completed in Southwark](#).

The council recommends the new London Plan supports boroughs to do everything they can to help close the gap between permissions granted and permissions built out. The council would support the use of so called 'use-it-or-lose-it' powers to incentivise stalled schemes to complete within a reasonable timeframe. The council would also welcome the Mayor's commitment to assist the council in bringing forward any necessary supporting infrastructure, including transport infrastructure, where this would accelerate development rates.

Southwark and other inner-London boroughs have for too long been expected to shoulder the lion's share of responsibility for facilitating much needed housing development. The council supports the Mayor's recognition of the greater role outer-London boroughs in sustainably meeting London's housing needs into the future.

Small sites

The council is strongly supportive of the Mayor's aspiration to support housing delivery on small sites through a positive approach to planning applications on small sites and through supporting smaller housebuilders to participate in the market.

The council has two principle concerns with the policy. Firstly, the policy introduces a housing target for completions on small sites as a subcomponent of the overall borough housing delivery target. It should be noted that Southwark's target does not reflect the historic level of housing approvals or housing completions on small sites, as defined in the draft policy, over the period 2014-2017. Whilst it is recognised the policy should lead to a greater number of homes coming forward on smaller

sites, it is advised the plan does not include targets at this stage as they do not appear to have been subject to any consideration of whether they are achievable. As such, the council recommends the 'targets' be presented as indicative benchmarks.

The second concern is graver. The policy proposes a presumption in favour of planning permission for small housing developments unless it can be demonstrated the development would give rise to an unacceptable level of harm to residential privacy, designated heritage assets, biodiversity or a safeguarded land use that outweighs the benefits of additional housing provision. The principle of the policy appears to undermine local plan policies.

Successful implementation of the policy appears dependent on the existence of 'design codes'. This raises the question of how applications should be assessed in the absence of design codes. It also raises the question of how boroughs should prepare design codes and how their preparation will be resourced. Southwark is characterised by having enormous diversity in terms of its urban form. There are significant differences between the characteristics of many neighbourhoods located shoulder to shoulder. Consequently, any design code appropriate to one area may be entirely inappropriate for another area. This means the council may have to carefully produce a considerable number of separate design codes to reflect each of Southwark's neighbourhoods. Prior to the production, consultation on and adoption of area design codes, the council would need to undertake detailed analysis of the design features and characteristics of all its neighbourhoods. The council simply does not have the resources to undertake this work and does not anticipate the requisite resources to be forthcoming.

The council also considers that the policy appears to have been formulated under the assumption that development on smaller sites is easier to bring forward and less controversial. This does not resemble the council's experience of managing development on small sites.

Should the Mayor be minded to progress the small sites policy then it is strongly recommended the policy should not come into effect until boroughs have adopted local design codes. Boroughs should be given a reasonable timeframe in which to prepare local design codes and support in their preparation.

Threshold approach to viability

Southwark Council currently require a full viability assessment for all schemes which trigger an affordable housing requirement. This is because the council is committed to 100% transparency in the assessment of all planning applications. The 'threshold approach' states that viability assessments are only required where a development proposal does not include a policy compliant affordable housing contribution.

The council is concerned the Mayor is seeking to embed the threshold approach to viability into the new London Plan. Southwark Council is highly committed to full transparency in the planning process, particularly in relation to matters concerning viability. The council appreciates the policy is intended to incentivise policy compliant development proposals to come forward and to incentivise their rapid delivery. However, the council considers the opportunity to scrutinise the viability of a scheme of the utmost importance. As such, the council strongly considers that the draft policy

should explicitly provide for the threshold approach to be recommended rather than mandated to allow for boroughs to continue to require viability assessments for all development proposals which trigger planning obligations.

The council is keen to protect its interests against the activities of unscrupulous developers which may take a buccaneer approach to securing planning permission, especially where an applicant is not itself a developer. There is a risk some applicant may offer a policy compliant affordable housing offer to secure planning permission but in reality this offer may be unviable and therefore the scheme will be undeliverable. In these circumstances the stalled development could only be unlocked through a revised application which reduces some of the development costs, specifically through lowering the quantum of affordable homes provided. Affordable housing contributions are an important consideration when looking at the wider benefits of a proposed development scheme. In some scenarios the level of affordable housing proposed may be weighed against elements of a proposal, for example massing, density, unit mix or scale, which may otherwise have been considered unacceptable. The threshold approach may risk the grant of unviable proposals which establish parameters of development that would not have been considered acceptable in the absence of the policy compliant affordable housing contribution. It then becomes difficult to challenge the acceptability of principle matters of development for revised applications.

Whilst the council does not support the threshold approach it is considered the policy could be enhanced. Firstly, thresholds set by the Mayor may not reflect local economic conditions. Boroughs should be able to set their own thresholds where local evidence suggests the Mayor's thresholds are inappropriate. Local market conditions may favour higher or lower local thresholds. Secondly, the council considers that the proposal to extend the threshold approach to build-to-rent development, including purpose-built shared living and student accommodation, presents a risk. This is because the distinct economics of these types of development could perversely incentivise these types of development in favour of conventional housing where it is likely to generate the best returns to a developer. The council also considers boroughs should be encouraged to set their own threshold where local viability evidence suggests it should be higher or lower than the Mayor's.

Affordable housing tenure

Southwark Council is strongly committed to providing new social rent homes. Social rented homes are supported by local residents and provide the most affordable form of accommodation for residents. The draft London Plan does not differentiate between social rent and London Affordable Rent. Whilst the council acknowledges both products command similar rents the policy should clarify that boroughs may set a local preference for social rent in place of London Affordable Rent where local evidence demonstrates this is viable. Southwark's emerging local plan explicitly requires social rented housing and the viability of this policy has been demonstrated through an independent strategic viability assessment as recently as December 2017.

Delivering affordable housing

The council supports the Mayor's strategic target for 50% of all new homes to be affordable. However, the council is concerned about the potential implications of cross-borough approaches to

portfolios¹. The council would expect any portfolio approach to relate to development across a portfolio within Southwark. If the portfolio approach were to be applied across London there is a significant risk that providers may concentrate their affordable housing provision in lower value parts of London, particularly in outer-London, at the expense of higher value areas of London such as Southwark. The council would object to any development proposal which sought to meet their affordable housing obligations outside the borough.

Purpose-built student accommodation

The council is broadly supportive of new purpose-built student accommodation and recognises the positive benefits students bring to the local economy and the knock-on impact of such development on releasing pressure on conventional family homes. However, the council does not consider the London Plan should allow for affordable housing requirements to be met through the provision of a proportion of the bedrooms at affordable student rents rather than conventional affordable housing. In Southwark there is an acute need for new conventional affordable housing. Accepting affordable student bedrooms on such proposals may compromise Southwark's affordable housing supply. This is particularly concerning in the north of the borough where a significant proportion of major residential development proposals may opt to deliver student accommodation in place of conventional C3 accommodation. The council strongly recommends the policy is amended to state that boroughs may accept affordable student rented accommodation in place of conventional affordable housing but this will be a decision for the borough and should be set out in their local plan.

Large-scale purpose-built shared living

The council is wary about the role of large-scale purpose-built shared living development in contributing towards London's housing needs. Whilst this form of development may meet a niche market demand the product must be carefully assessed to ensure high residential standards are achieved for occupiers.

The council recommends the Mayor produces evidence-based guidance setting out design and accessibility guidance for this type of development to ensure appropriate quality standards relating to private bedrooms and communal amenity spaces. It is also important to ensure that any such proposals would genuinely function as shared-living spaces and could not be used as sub-standard studio-apartments.

The council does not support the draft policy approach to affordable housing. The council agrees that discounted shared-living bedrooms are an unacceptable form of development but the council considers development proposals should demonstrate firstly that conventional affordable housing cannot be provided on site alongside the shared living accommodation. Assuming this is satisfactorily demonstrated the applicant should then demonstrate whether conventional affordable housing can be provided off site. The approach to calculating the value of in lieu affordable housing

¹ The portfolio approach states that affordable housing providers with agreement from the Mayor and development on public sector land may provide 50% affordable housing across a portfolio of sites and strategic partners with agreement from the Mayor may provide 60% affordable housing across a portfolio of sites.

payments does not appear to be based on any consideration of viability. The council considers any affordable housing in lieu contribution requirements should be calculated as per a conventional C3 housing development. Section 106 agreements could then be constructed to account for issues relating to the financing of the scheme.

Water transport

The council supports the retention of functional boatyards. However, the policy, as currently drafted, is unduly restrictive and may prevent opportunities to intensify boatyards through rationalisation which simultaneously could provide opportunities for new homes.

Delivery of the Plan and Planning Obligations

The council supports the Mayor's premise that applicants should take account of development plan policies when developing proposals and acquiring land. As such, viability testing should only be undertaken on a site-specific basis where there are clear circumstances creating barriers to development.

The council recommends the Mayor does not allow for site-specific exceptional or abnormal costs (which may include issues such as high levels of contamination, requirement to divert major utilities, poor ground conditions necessitating special foundations/ ground works). Abnormal costs are an inherent risk of being a developer and should not be a factor for planning policy. The presence of such issues will impact land value and the cost should never be born through a reduction in Planning Obligations. The consultant doing the due diligence should have professional indemnity insurance to cover any oversight on their part in reporting to their client. Where liability is qualified by the consultant, then the developer should build in sufficient contingency to cover any unknown costs.

The policy notes that where viability is a genuine issue, boroughs should prioritise affordable housing and necessary transport infrastructure. The council urges the Mayor to consider exceptions to this where a site can contribute towards the delivery of essential social infrastructure such as education or health facilities and acknowledge these uses may be given priority over affordable housing or transport infrastructure on a case-by-case basis. This is particularly important in areas where the planning authority does not own land or where social infrastructure can be best provided on a mixed-use private-led scheme. A recent example of such a scheme is the former Fire Station on Southwark Bridge Road which provided a new secondary school.

Yours sincerely

Simon Bevan
Director of Planning

Appendix 1 – detailed comments on individual policies

Chapter 1: Planning London's Future (Good Growth Policies)		Detailed comments
Policy GG1	Building strong and inclusive communities	<p>The policy is positive and aligned to Southwark's objectives.</p> <p>The council welcomes the reference to 'National Park City' but notes that the cultural heritage dimension of National Parks is not evident in the definition at present and this should be added.</p>
Policy GG2	Making the best use of land	<p>The policy is positive and aligned to Southwark's objectives.</p>
Policy GG3	Creating a healthy city	<p>Social isolation and mental health are also prevalent health issues in which the built environment plays a role. The policy could be improved to require planning and development to increase opportunities for social interaction for all people. The London Plan will contribute to these opportunities with town centres, healthy streets, open spaces and culture and leisure facilities.</p> <p>The policy could be strengthened by a greater commitment to Health Impact Assessments (HIAs), as these can help reduce health inequalities. HIAs should address the construction phase of development and focus on both physical and mental health.</p> <p>HIAs will help Developers to identify important aspects of the masterplan and building design that can have an impact on health. Many features of development, such as increased and better access to open green space, play spaces and improved walkability/cycling infrastructure will have a positive effect on health, and an HIA will assist in gathering all these beneficial impacts in one single and accessible document.</p> <p>There are various HIA templates currently available at the moment, such as HUDU's Rapid HIA tool and the Mayor may want to consider producing a London-wide HIAs guidance and template to assist Boroughs to ensure consistency, provided each individual Planning Authority will retain the ability to focus on specific and local health priorities.</p>
Policy GG4	Delivering the homes Londoners need	<p>The policy is positive and aligned to Southwark's objectives.</p>
Policy GG5	Growing a good economy	<p>The policy is positive and aligned to Southwark's objectives.</p>

Policy GG6	Increasing efficiency and resilience	<p>The council recommends the policy could be strengthened with carbon reduction milestones leading up to 2050. It is especially important to set targets within the timeframe of the London plan.</p> <p>Appropriate urban greening and management of the natural environment will increase the resilience of nature in the city so that it continues to benefit the wellbeing of residents. The natural environment is mentioned in relation to health and land use in the other Good Growth policies but it is also worthy of mention in strategic policy GG6.</p>
Chapter 2: Spatial Development Patterns		Detailed comments
Policy SD1	Opportunity Areas	<p>Southwark is home to four Opportunity Areas (Elephant and Castle, Canada Water, Old Kent Road and London Bridge, Borough and Bankside). The council supports the Mayor's commitment to assist with delivering new supporting infrastructure within opportunity areas to enhance capacity for new homes and jobs. In particular the role of the Bakerloo line Extension in providing extensive opportunities for the regeneration of the Old Kent Road Opportunity Area. The policy (part B5), and supporting text, requires no net loss of industrial floorspace capacity in the Old Kent Road OA and that the AAP should set out how industrial land can be intensified. In line with comments on Policies E4, E5 and E6, officers consider the expectations of the future re-designation of industrial land whilst retaining industrial capacity should be clearer in the detailed policies.</p> <p>Figure 2.4 specifies the capacity of the Old Kent Road OA as 12,000 homes and 5,000 jobs. The council requests this is updated to 20,000 homes and 10,000 additional jobs as anticipated and planned for as part of the Old Kent Road AAP/OAPF, in anticipation of the delivery of the Bakerloo Line and maximising the potential for growth.</p> <p>All of Southwark's Opportunity Areas are identified as Strategic Areas of Regeneration. However London Bridge, Borough and Bankside consists of two town centres and just Borough and Bankside are identified as a Strategic Area of Regeneration. It is suspected this is an error that requires correction. However, in the event this is not an error, it is recommended that both town centres (Borough and Bankside and London Bridge) are identified as Strategic Areas of Regeneration to support the ambition of the overall Opportunity Area.</p>
Policy	Collaboration in	The council supports the Mayor in taking a leading role

SD2	the Wider South East	on cooperation with the wider South East. It could be clarified in the policy that London boroughs and authorities outside of London only need to collaborate further under the formal Duty to Cooperate when there are more local and specific cross-boundary issues to address, as already suggested in paragraph 2.2.8. The Mayor could commit to preparing a Duty to Cooperate statement on behalf of London boroughs.
Policy SD3	Growth locations in the Wider South East and beyond	No comments.
Policy SD4	The Central Activities Zone (CAZ)	<p>The Central Activities Zone policy (CAZ) sets out the diverse and wide-ranging strategic functions for the CAZ, particularly the emphasis on its nationally and internationally significant office functions. The CAZ contains over 80% of the total office jobs within Southwark and vacancy rates are low. Demand for office space continues to increase and the CAZ offers the opportunity for high quality office floorspace to be delivered to accommodate anticipated need and demand.</p> <p>The identification of South Bank, Bankside and London Bridge as a specialist cluster for arts, culture and entertainment is welcomed, particularly for its rich cultural activity and heritage.</p> <p>Elephant and Castle is identified as an academic cluster which is also welcomed. However, Elephant and Castle is, and continues to be, an important area for arts, culture and entertainment within the CAZ. It is recommended the designation of cluster for arts, culture and entertainment extends to include Elephant and Castle. This would reflect its current role and the growth aspirations for the opportunity area, as set out in the Elephant and Castle SPD/OAPF (2012).</p>
Policy SD5	Offices, other strategic functions and residential development in the CAZ	<p>The council welcomes the clarity of the policy in stating new residential development should be complementary, and locally oriented, and not compromise the strategic functions of the CAZ. This is a helpful clarification of new land use priorities in the CAZ in the context of the significance of the CAZ as a key driver of economic and cultural uses.</p> <p>The council supports greater weight given to offices and other CAZ strategic functions in some parts of the CAZ, including the London Bridge, Borough & Bankside OA and equal weight given to offices and other CAZ strategic functions in relation to residential development in the Elephant and Castle OA.</p>

		<p>Southwark supports the requirement for net increases in office floorspace in those parts of the CAZ where mixed use office/residential proposals are supported.</p> <p>With regard to Part F, which supports boroughs to introduce Article 4 Directions to remove office to residential permitted development rights, the council is committed to ensuring the CAZ continues to be protected against office to residential permitted development conversions. Southwark's Planning Committee will be considering a recommendation to introduce such an Article 4 Direction in March 2018.</p>
Policy SD6	Town centres	<p>The council supports the role of town centres as hubs for a range of activities, including opportunities for higher density mixed-use development including a range of housing types, and providing a focus of commercial activity outside the CAZ.</p> <p>Demand for retail floorspace is projected to grow in Southwark particularly concentrated in town centres in the north and centre of the borough and to serve significant new housing growth.</p> <p>The council considers that residential-only schemes outside of primary and secondary frontages may be appropriate in certain instances. This should be set within the context of replacing any retail uses or services of value to the general public that would otherwise be lost in a residential-only scheme, unless it can be demonstrated that these uses would be unsuitable or unviable (Part C).</p>
Policy SD7	Town centre network	<p>The council is troubled the policy identifies Canada Water as a district town centre and two district town centres along Old Kent Road.</p> <p>Part C states the classification of International, Metropolitan and Major town centres can only be changed through the London Plan. Canada Water is a designated opportunity area in the London Plan and an AAP has been formally adopted for the OA. Canada Water is a formally designated Major town centre in the AAP and the adopted Southwark Core Strategy (2011). Canada Water currently has 37,000sqm of retail floorspace and is anticipated to grow by a further 35,000sqm. There are already a number of commitments in the planning pipeline (approximately 20,000sqm) and a strategic planning application for the majority of the town centre redevelopment is being prepared by British</p>

		<p>Land. It is recommended Canada Water is reclassified as a major town centre to align with the adopted Local Plan acknowledging the existing function and growth potential of this significant town centre.</p> <p>The council objects to the proposed classification of two Old Kent Road district centres. This approach is disjointed when considering the opportunity area as a whole and the strategy for the town centre set out in the draft AAP/OAPF. Paragraph 2.7.4 identifies that where areas currently contain retail parks and car parking, a clear strategy should be developed for a broader mix of town centre uses and retail formats, a reduction in car travel and the promotion of safe and welcoming places to visit and spend time. The draft AAP/OAPF sets out this strategy clearly for Old Kent Road, demonstrating the existing areas of the linear high street and how this can be developed further to achieve a revitalised high street along the entire length of the road, interspersed with green spaces, squares and some minor stretches of established residential development not uncommon in town centres.</p> <p>The draft AAP/OAPF also encourages clustering of retail uses near proposed new tube stations and a range of shop units and sizes, from smaller independent retailers to supermarkets. Smaller shops and secondary retail are encouraged in masterplan areas behind the Old Kent Road frontage supported by community, leisure, entertainment and cultural uses. The Old Kent Road is a large opportunity area that currently hosts 95,000sqm of retail floorspace; it contains traditional high street premises as well as large retail parks. Local policies require this floorspace to be re-provided and reconfigured to a linear high street format as demonstrated on the AAP/OAPF masterplan and town centre map. The opportunity area has huge potential for change facilitated by significant transport enhancements including the Bakerloo line extension which is a key priority in the new London Plan. Building on the ambitious strategy set out in the draft AAP/OAPF for the opportunity area, and to attract significant investment including potential for a university and a major cultural attraction it is recommended that the London Plan recognises and supports Southwark’s approach to the designation of Old Kent Road as a major town centre.</p> <p>Additionally the entire Old Kent Road centre should be recognised for the night-time economy, office growth and high commercial growth potential and it is recommended Annex 1 is amended to reflect this.</p>
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		<p>Peckham and Camberwell serve a local market for offices and therefore these centres could be reclassified to 'C' 'protect small office capacity' in Annex 1.</p> <p>Herne Hill is an adopted District town centre in the Southwark Core Strategy and serves communities across Southwark and Lambeth. Herne Hill should also be included in the Annex 1 town centre network list.</p>
Policy SD8	Town centres: development principles and Development Plan Documents	In principle the council supports the town centre first approach with regard to proposals for town centres to encourage a concentration of these uses and enliven existing and new town centres. Part A2 of the policy sets a strong resistance to out-of-town retail development and Part A3 requires an impact assessment for any edge of centre or out of centre development of town centre uses. It is considered that in the CAZ or the CAZ fringe, town centre uses may also be appropriate to service a central London function, and this should be acknowledged within the policy to maintain consistency with the CAZ policies.
Policy SD9	Town centres: Local partnerships and implementation	<p>In principle the council is supportive of the Mayor's aspiration for town centres to have a Town Centre Strategy. However, it should be recognised that some town centres may function well already and not require such a strategy. Furthermore, it should be noted that boroughs may not have the resources to support the preparation of Town Centre Strategies. The council would welcome support from the Mayor to produce Town Centres Strategies where they are needed.</p> <p>The council supports the Mayor's strategy to manage development through the targeted introduction of Article 4 Directions removing permitted development rights for change of use from office, light industrial and retail permitted to residential uses.</p>
Policy SD10	Strategic and local regeneration	<p>The council supports the designation of Elephant and Castle, Canada Water, Peckham, Camberwell, Bankside and The Borough and Old Kent Road as Strategic Areas for Regeneration to help tackle impacts of inequality and deprivation and ensuring that regeneration planned for the borough is in collaboration with the local communities who live, work and visit these areas.</p> <p>All of Southwark's Opportunity Areas are also identified as Strategic Areas of Regeneration. However, London Bridge, Borough and Bankside consist of two town centres and just Borough and Bankside is identified as a</p>

		Strategic Area of Regeneration. The council cannot identify a discernible difference between these town centres. It is recommended that both town centres are designated Strategic Areas of Regeneration to support the ambition of the overall Opportunity Area.
Chapter 3: Design		Detailed comments
Policy D1	London's form and characteristics	<p>Sunlight, shade, wind, and shelter are important aspects of the design of the pedestrian environment that are mentioned in the supporting text. The council urges the Mayor to elevate these aspects of good design into policy itself.</p> <p>Policy D1 A 10) could be improved to ensure servicing traffic avoids impacts to pedestrians and cyclists in general as well as to vulnerable road users. The council considers that the policy could be strengthened by providing quality of design requirements for denser schemes.</p> <p>The council is concerned that the policy requires all referable schemes above a prescribed density or defined as a 'tall building' to go to a design review panel early on in their preparation, before a planning application is made. An element of discretion may be prudent for schemes which are at the lower range of the prescribed density levels or where the tall buildings are appropriate to the context.</p>
Policy D2	Delivering good design	<p>This policy, which includes guidance for borough local plan preparation and planning applications, largely repeats national policy or established planning processes in D2 A, B, D, E and H. The council does not anticipate that boroughs would benefit from this level of detail in the policy.</p> <p>The council supports the use of modelling, including 3D models, to engage residents. The council also agrees that applicants should provide the technical information to facilitate this process. Applicants should provide data in appropriate file formats.</p> <p>The council requests the policy provides further information and guidance regarding the proposal for architect retention clauses and where these would be appropriate.</p>
Policy D3	Inclusive design	The council supports policy aimed at improving the accessibility of buildings and creating a more inclusive environment. The requirement of at least one lift per

		<p>core that is suitable to evacuate visitors/residents in case of an emergency is particularly welcome.</p> <p>Policy D3 prescribes that the internal environment of developments should meet the highest standards in terms of access and inclusion. Officers recommend an additional requirement that all communal areas of a residential development (entrances, hall, landings and roof gardens etc.) be tenure blind with equal access.</p>
Policy D4	Housing quality and standards	<p>The policy is complementary to the approach taken in the New Southwark Plan. However, policy P4.E (which relates to dual aspect dwellings) does not directly reference the unsuitability of north-facing single aspect dwellings or single aspect dwellings whose façade is exposed to high noise levels (although this is referenced in the justification text – para 3.4.5).</p> <p>The council encourages the Mayor to take a firmer stance against single-aspect homes which are north facing or where the façade is exposed to high levels of noise.</p>
Policy D5	Accessible housing	<p>The policy states that M4(2) and M4(3) dwellings should be secured by planning condition to allow the building control body to check compliance.</p> <p>Southwark Council uses a condition to ensure that compliance can be identified in advance of commencement of development. This is because it is hard to enforce against a breach of condition once a development has been completed.</p> <p>The council recommends the Mayor to follow Southwark’s approach (i.e. use pre-commencement conditions). The council tends to use the following condition: ‘Before the development hereby permitted is commenced, the applicant shall submit written confirmation from the appointed building control body that the specifications for each dwelling identified in the detailed construction plans meet the standard of the Approved Document M of the Building Regulations (2015) required in the schedule below and as corresponding to the approved floor plans. The development shall be carried out in accordance with the details thereby approved by the appointed building control body’.</p>
Policy D6	Optimising housing density	<p>The new London Plan proposes a design-led approach which should optimise residential density on a case-by-case basis. It proposes the appropriate level of density and scale of development should reflect planned</p>

		<p>infrastructure capacity (rather than existing).</p> <p>This approach is unlikely to have a significant impact on development decisions in Southwark as the council tends to accept development proposals which fall outside the SRQ matrix where justified by the quality of the proposal. However, the SRQ does provide a useful basis for establishing approximate density ranges at the start of the negotiation process and may help developers formulate their land acquisition offers.</p> <p>The council cautions against moving away entirely from an approach which allowed for a crude estimate of indicative development capacity.</p>
Policy D7	Public realm	<p>The council welcomes the attention given to aspects of the public realm that can support health and wellbeing including microclimate, public access, seating, drinking water, opportunities for play and the management of service entrances.</p> <p>D7 H could be improved by requiring green infrastructure to benefit mental wellbeing as well as the functions listed.</p> <p>D7 B and L seek to manage the impacts of on-street parking. The New Southwark Plan restricts new car parking on the public highway. Southwark's Kerbside Strategy will deliver better management of our kerbside space to prevent and reduce road traffic collision, support a more active population, reduce traffic congestion and improve air quality. D7 B and L could give greater support for boroughs that are going further to reduce the negative effects of car parking.</p>
Policy D8	Tall buildings	<p>The council considers the requirement for boroughs to identify on maps locations where tall buildings will be an appropriate form of development in principle to be unduly prescriptive. The policy should clarify that identified tall building locations should only be indicative and not exclude opportunities for tall buildings in areas which have not been identified. There is a risk that tall building zoning approach could reduce opportunities to build acceptable taller buildings outside of the designated areas.</p> <p>The policy does not consider appropriate separation between tall buildings in tall buildings clusters. This is an important aspect to consider and should be included in the policy. The policy could be strengthened by referencing the impact of tall buildings on over-</p>

		shadowing, particularly over-shadowing of public realm spaces.
Policy D9	Basement development	No comments.
Policy D10	Safety, security and resilience to emergency	Officers recommend paragraph 3.9.4 adds “air quality” to the list in the last sentence of the paragraph.
Policy D11	Fire safety	<p>The council supports the Mayor’s commitment to ensure fire safety is considered at the planning application stage and the council welcomes measures to encourage fire safety to be fully considered in advance of the planning stage.</p> <p>It should be acknowledged that presently most planning officers are unlikely to have the requisite skills or training to evaluate fire safety plans. The council urges the Mayor to consider publishing detailed guidance and supporting training.</p>
Policy D12	Agent of Change	<p>The council is supportive of the Agent of Change approach. Further guidance would be helpful to understand the level of technical detail required in Noise Impact Assessments to ensure that the effectiveness of proposed acoustic design can be assessed at the determination stage in conjunction with Environmental Protection Team, to ensure the acoustic design would successfully mitigate noise impacts that would warrant refusal of the application under the agent of change principle.</p> <p>Guidance on a consistent approach to how physical mitigation would be secured on existing noise-generating uses/sites through planning obligations, and how mitigation can be effectively enforced by planning enforcement if it was not delivered and consequently caused noise issues would also be helpful.</p> <p>The council would support the Mayor to lobby national government to apply the agent of change policy principles to ‘prior approval’ development.</p>
Policy D13	Noise	<p>The policy is consistent with draft NSP Policy P67 where Southwark will be requiring major development to protect and enhance positive aspects of the acoustic environment in designated open spaces, open water space, public realm and street markets.</p> <p>It would be helpful for the Mayor to define what constitutes a significant adverse impact from noise . The</p>

		policy should require consideration of the interaction between noise insulation, adequate ventilation and overheating issues, and use of passive design measures to overcome this.
Chapter 4: Housing		Detailed comments
Policy H1	Increasing housing supply	<p>The policy states boroughs should optimise the potential for housing delivery on all suitable and available brownfield sites, especially on industrial sites that have been identified through the processes set out elsewhere in the plan (Policy E4 Land for industry, logistics and services to support London’s economic function, Policy E5 Strategic Industrial Locations (SIL), Policy E6 Locally Significant Industrial Sites and Policy E7 Intensification, co-location and substitution of land for industry, logistics and services to support London’s economic function).</p> <p>This approach is consistent with Southwark’s development aspirations for the Old Kent Road Opportunity Area and other protected industrial sites (as set out in the New Southwark Plan).</p> <p>The council has previously critiqued the London Plan approach to setting housing delivery targets as these effectively set the target based on identified capacity rather than taking account of delivery trends or market signals. In Southwark a reality of the local development market is that several sites with planning permission are in active use and development cannot commence for significant periods while the applicant secures vacant permission. In some of these cases the development does not go ahead at all where the applicant determines that exercising their site option is less attractive than keeping the site in its current use.</p> <p>This notwithstanding, the council considers the Mayor could do more to assist boroughs in ensuring their housing delivery targets are achieved in terms of housing completions and not simply in terms of planning permissions. The council would support so-called ‘use it or lose it’ powers and Mayoral support to compulsorily purchase land where implementation of a scheme is delayed due to land assembly challenges. Furthermore, the council considers the prospect of meeting housing delivery targets could be improved through greater Mayoral support in delivering key enabling infrastructure.</p>
Policy H2	Small sites	To implement the policy effectively boroughs should prepare area design codes that promote good design and proactively encourage increased housing provision

		<p>and higher residential densities on small housing developments.</p> <p>The London Plan is unclear how the presumption will operate when development proposals conflict with policies of borough plans. It is important that the small sites policy does not undermine the operation of Local Plan policies. The policy does not set out how boroughs should prepare design codes or how this may be resourced.</p> <p>For these reason the council does not support the policy at this stage.</p> <p>Southwark is characterised by having enormous diversity in terms of its urban form. There are significant differences between the characteristics of many neighbourhoods located shoulder to shoulder. Consequently, any design code appropriate to one area may be entirely inappropriate for another area. This means the council may have to carefully produce a considerable number of separate design codes to reflect each of Southwark’s neighbourhoods. Prior to the production, consultation on and adoption of area design codes the council would need to undertake detailed analysis of the design features and characteristics of all its neighbourhoods. The council simply does not have the resources to undertake this work and does not anticipate the requisite resources to be forthcoming.</p> <p>The council also considers that the policy appears to have been formulated under the assumption that development on smaller sites is easier to bring forward and less controversial. This does not resemble the council’s experience of managing development on small sites.</p>
Policy H3	Monitoring housing targets	<p>The change of approach to measuring student bedrooms on the basis of a 3:1 ratio will undermine Southwark’s ability to achieve its housing targets. The approach is flawed and each independent unit (including bedrooms in halls or residence) should be counted as a new housing unit.</p>
Policy H4	Meanwhile uses	<p>The New Southwark Plan supports meanwhile uses where they deliver community benefits and do not compromise the future redevelopment of the site. As such the policy does not conflict with the New Southwark Plan.</p> <p>However, the council recommends the Mayor also</p>

		<p>considers commercial meanwhile uses in suitable locations such as in town centres. The council also recommends the policy acknowledges meanwhile housing should provide an acceptable level of residential amenity.</p>
Policy H5	Delivering affordable housing	<p>The council supports the Mayor’s strategic affordable housing target for 50% of all new homes to be affordable.</p> <p>One element of the approach is that 50% can be achieved across a portfolio of sites in some circumstances. For example, public sector land or housing associations can provide 50% affordable housing across a portfolio of sites.</p> <p>The council is concerned the portfolio approach set out in the plan is insufficiently clear that any portfolio must be considered within a single borough. As currently worded there is a risk the policy could be interpreted to allow a pan-London approach to development portfolios that would allow for lower levels of affordable housing delivered in the higher values areas of a provider’s portfolio and higher levels in the lower value areas. As a higher value part of London this is of particular concern to the council.</p>
Policy H6	Threshold approach to applications	<p>The policy seeks to embed the ‘threshold approach’ to viability, as set out in detail in the Affordable Housing and Viability SPG, into all planning applications which trigger an affordable housing requirement. The council is opposed to the inclusion of the threshold approach in the London Plan. The threshold approach does not allow boroughs, and more importantly, their residents, the opportunity to scrutinise the affordable housing offers of policy compliant development proposals. It is the council’s view that transparency of development viability information is of utmost importance.</p> <p>Southwark takes account of the level of affordable housing contributions in the round when considering the acceptability of a development proposal. In essence, the council may determine that the benefit of affordable housing provision outweighs concerns regarding massing, density, unit mix or scale of a proposal. The council is concerned the threshold approach may incentivise applications which are intended to establish acceptable development parameters but which are unviable and cannot be built out. There is a risk the threshold approach could lead to the council permitting a scheme which would not have been permitted in the</p>

		<p>event a less significant affordable housing contribution were on offer. However, once the parameters of acceptable development are established through the grant of permission the council's discretion to refuse such a permission on the grounds of massing, density, unit mix or scale would be fettered in the event a subsequent application is submitted which offers a lower level of affordable housing (that represents the maximum viable amount).</p> <p>The council requests the draft policy be amended to note the threshold approach should be assumed to apply across London but that the approach will not apply where a borough has published borough level guidance regarding the process of assessing the viability of a scheme.</p> <p>In the event the Mayor does not allow for the proposed opt out the council consider that the policy should be changed to reflect the more nuanced position set out in the preceding Affordable Housing and Viability SPG: <i>'When considering Opportunity Areas, Housing Zones and industrial land, LPAs may wish to apply a localised affordable housing threshold for the Fast Track Route or fixed affordable housing requirements that maximises affordable housing delivery. This approach could help provide certainty to developers and land owners about the affordable housing requirements and help prevent land price rises based on hope value. Localised affordable housing thresholds, or fixed affordable housing requirements, should increase affordable housing provision beyond 35 per cent where possible.'</i> This is because Southwark considers the 50% threshold on industrial land is far in excess of the likely viable affordable housing contribution that could be secured in the Old Kent Road Opportunity Area.</p> <p>The policy specifically references that applications should be determined in accordance with the methodology and assumptions set out in the Affordable Housing and Viability SPG. This is a really important point and the policy would have more weight if the core principles of the approach were set out in the policy directly. This is especially important regarding the approach to benchmark land values (BLVs) ('The Mayor will use the residual land value methodology to determine the underlying land value once the costs of the development (including developers' profit) are deducted from the gross development value').</p> <p>The policy should state there should be no benchmarking</p>
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		<p>against alternative use values (AUVs) or extant consents as they both allow developers/landowners to manage out planning policy requirements which are subject to viability. The definition of the BLV for viability assessments should be 'the value below which the site would be retained in its existing use' This would inherently include an appropriate premium. Existing Use needs to be carefully defined to avoid manipulation. For example, it should not be the refurbished state of existing dilapidated buildings or a theoretical denser office scheme in the case of an established B1 use. It needs to be limited to the value of the land or buildings (in their existing condition) on the site immediately before the planning application is submitted and excluding hope value.</p> <p>Any link between the motives of a land owner in selling the site and the benchmark for viability assessments needs to be dismissed. Once the 'value below which the site will be retained in its existing use' is reached this is the point at which a landowner will test the market by advertising for the highest bidder i.e. they will not sell at the benchmark level but at the maximum the market will pay.</p> <p>Only where the policy compliant bid price for the site is below the benchmark should there be any consideration of relaxing planning policy requirements</p> <p>It is up to the development market to deliver the most profitable policy compliant development (this may be an extant consent or some other scheme of development). At present landowners/developers can buy a site then implement a scheme which has consent in such a way that does not commit the developer to completing the consent, for example, by digging a trench. This then allows them to benchmark their intended scheme against the extant scheme site value even though they have no intention of delivering this scheme. The rationale given for this is that this is the site value they could realise in the market ignoring hope value for the development they propose to deliver. The market will determine the value of the site for development and the benchmark for assessing viability must be referenced to the existing use not a site value for a development of any sort. The motives of the landowner are not the relevant factor. It should be the value of the site in its existing use (with existing use defined to exclude the value of the subject site for any sort of development i.e. extant consents AUVs etcetera.</p>
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Policy H7	Affordable housing tenure	<p>The policy requires at least 30% of new affordable homes to be low cost rented homes (social rent / London Affordable Rent) and at least 30% to be intermediate housing products. The tenure of the remaining 40% of new affordable homes is to be determined by the borough based on local need.</p> <p>This policy is broadly supportive of Southwark’s emerging policy in the New Southwark Plan (NSP) for built for sale development. However, the NSP requires 71% social rent and 29% intermediate housing which is 1% short of the Mayor’s target. However, at a strategic level the NSP is likely to be consistent with the Mayors approach as Southwark’s housing output will include a mix of build to rent and built for sale developments. Southwark allows for a greater proportion of new affordable homes to be intermediate tenure on build to rent development.</p> <p>The policy does not clarify whether boroughs can require social rent in place of London Affordable Rent. Southwark’s clear preference is for social rent, as set out in the NSP. The plan states the Mayor’s preferred affordable housing tenures are: London Affordable Rent, London Living Rent and London Shared Ownership. The council requests the Mayor clarifies that boroughs may specify a requirement for social rent in preference to London Affordable Rent.</p> <p>The draft policy states that all intermediate rented products (including Discount Market Rent) should be affordable to households on incomes of up to £60,000. This conflicts with the NSP which accepts a small proportion of DMR homes affordable to households on incomes between £60,000 and £90,000 where provided as part of a Build to Rent development. The council allows for some DMR units for higher income households because of the exceptionally high local market rents and because it allows the council to secure some DMR homes at even deeper discounts (‘social rent equivalent’).</p> <p>The council recommends the London Plan states boroughs should determine whether preference is given to affordability (tenure) of affordable homes or the overall quantum (with affordability / tenure) being adjusted to achieve the maximum quantum.</p>
Policy H8	Monitoring of affordable housing	No comments.
Policy H9	Vacant building credit	The New Southwark Plan does not accept the Vacant Building Credit in any circumstances as the viability of a

		<p>scheme will always be considered on a case-by-case basis.</p> <p>The council requests the Mayor inserts the caveat that the Vacant Building Credit should not be applied at all where a borough Local Plan proscribes its use.</p>
Policy H10	Redevelopment of existing housing and estate regeneration	No comments.
Policy H11	Ensuring the best use of stock	No comments.
Policy H12	Housing size mix	<p>The policy states that generally, schemes consisting mainly of one-person units and/or one bedroom units should be resisted and that Boroughs should not set prescriptive dwelling size mix requirements (in terms of number of bedrooms) for market and intermediate homes.</p> <p>The New Southwark Plan includes policies which set out the minimum proportion of larger units that should be provided in different parts of the borough. In the absence of this policy there may be a stronger pressure to permit schemes which are predominantly one or two bed units of private or intermediate tenures as this would reflect market demand. Consequently developers may choose to only provide family sized low cost rent (social rent) homes. This would not be conducive to creating a mixed and balanced community.</p> <p>The council urges the Mayor to encourage boroughs to establish minimum bedroom requirements where these are not too onerous and where there is an evidenced market need. The absence of a local policy could result in significantly more one and two bed developments in Southwark due to the high value of new homes and developers' incentive to target the largest possible market.</p>
Policy H13	Build to Rent	<p>The policy is similar to the policy P4 in the New Southwark Plan 'Private Rented Homes'.</p> <p>However, P4 applies only to schemes providing at least 100 homes whereas policy H13 applies to schemes providing at least 50 homes. It is recommended the policy is amended to allow for boroughs to set their own thresholds.</p> <p>P4 requires the market rent homes to be secured for a minimum period of 30 years and H13 requires the</p>

		<p>market rent homes to be secured for a minimum period of 15 years. Again, it is recommended the policy is amended to allow for boroughs to set their own minimum covenant lengths.</p> <p>The policy states affordable housing may be provided as Discount Market Rent with the majority at London Living Rent. This is broadly consistent with the approach in P4 which requires just over half of the DMR homes to be provided at London Living Rent and the remainder to be provided with a combination of social rent equivalent and DMR with less deep discounts for higher earning households.</p> <p>Further to the council's comments earlier regarding the threshold approach to viability, the council urges the Mayor not to open the threshold route to viability to build to rent schemes. The economics of build to rent are fundamentally different to built for sale schemes and the Mayor should ensure there are no unknown incentives to bring forward build to rent development in place of built for sale development.</p>
Policy H14	Supported and specialised accommodation	No comments.
Policy H15	Specialist older persons housing	The New Southwark Plan is supportive of new older person's accommodation where there is an identified need.
Policy H16	Gypsy and Traveller accommodation	No comments.
Policy H17	Purpose-built student accommodation	<p>This policy conflicts with the New Southwark Plan in respect of affordable housing. For direct-let student accommodation (i.e. those which are not secured for use for a specified higher education provider) the council requires 35% conventional affordable housing and as much affordable student accommodation as is viable. For student homes secured for specific higher education providers the rooms should all be affordable and the development should provide as much conventional affordable housing as is viable. The council recommends the draft policy allows boroughs to prioritise conventional affordable housing over affordable student accommodation.</p> <p>Further to the council's comments earlier regarding the threshold approach to viability, the council urges the Mayor not to open the threshold route to viability to student accommodation schemes. The economics of</p>

		<p>build to rent are fundamentally different to built for sale schemes and the Mayor should ensure there are no unknown incentives to bring forward build to rent development in place of built for sale development.</p>
Policy H18	Large-scale purpose-built shared living	<p>Policy H18 is a significant departure to assessing large-scale purpose-built shared living from the approach set out in the New Southwark Plan. The council requires any such proposals to provide conventional on-site affordable homes and where this is not possible off-site or an in-lieu payment may be required. The council does not support the Mayor’s proposal that the default position regarding affordable housing should be an in lieu payment. This notwithstanding, the council supports the Mayor’s position that the affordable housing contributions cannot take the form of sub-market shared living units.</p> <p>The council questions the basis of the mechanism proposed to derive the value of an affordable housing payment. It is important to ensure the mechanism would not incentivise developers to provide shared-living accommodation in place of conventional housing schemes due to lesser affordable housing requirements.</p> <p>The council request the Mayor allows boroughs to require conventional on-site affordable housing or calculate the value of any in lieu payments following the same approach that would be followed for conventional housing schemes.</p> <p>It is further proposed the Mayor does not provide for the ‘fast-track’ approach to viability for shared-living schemes in order to ensure there is no financial benefit to progressing shared living in favour of conventional housing.</p> <p>The council encourages the Mayor to produce planning guidance regarding design and accessibility standards for this type of development. However, there are some potential issues with this type of development which the council considers the policy should address.</p> <p>The council considers the policy could be strengthened by stating that applicants must demonstrate shared living units could not effectively be used as sub-standard self-contained flats. As such, in room facilities should be minimal and mostly pooled in communal areas.</p> <p>The council also considers the policy could be strengthened through introducing a requirement to</p>

		ensure noise insulation measures between rooms are enhanced for this type of development. Furthermore, it is recommended the policy includes minimum space standards for each private unit (including private storage).
Chapter 5: Social Infrastructure		Detailed comments
Policy S1	Developing London's social infrastructure	The council recommends the policy should clarify that point G of the policy should apply to F2 in that all development proposals resulting in a loss of social infrastructure should be considered for full or partial use as other forms of social infrastructure before alternative developments are considered.
Policy S2	Health and social care facilities	The Council considers it may be appropriate to prioritise the provision of social infrastructure such as primary health care facilities over the provision of affordable housing where a development cannot provide a policy compliant affordable housing contribution for reasons of viability. It is recommended the policy is amended to reflect this.
Policy S3	Education and childcare facilities	The council recommends the policy encourages the sharing of school facilities (in particular sports facilities) with the wider community, which would benefit the wider community through increased opportunity for physical activity and social cohesion.
Policy S4	Play and informal recreation	The council recommends point 5 should mention that any re-provision of play areas must be in the locality of the development to serve the same catchment area.
Policy S5	Sports and recreation facilities	The council recommends that new sports facilities should be fully accessible and should cater for both children and adults and all ability levels.
Policy S6	Public toilets	The council recommends the draft policy is amended to include a minimum threshold for larger developments and a requirement that toilets should be fully accessible, safe, well lit and maintained.
Policy S7	Burial space	No comments.
Chapter 6: Economy		Detailed comments
Policy E1	Offices	The council supports the emphasis on the demand for offices in the CAZ and the importance of maintaining and growing this cluster of world class office space. The emphasis on changing dynamics of the office market is also supported, to ensure a diverse range of office spaces which includes space suitable for micro-

		businesses and SMEs.
Policy E2	Low-cost business space	<p>The council’s approach to low cost business space, as set out in the New Southwark Plan, includes policies that closely align with the approach set out in the new London Plan. There is an increasing demand for business space for start-up businesses, micro-businesses and SMEs which should be incorporated into the design of new developments.</p> <p>The council supports the incorporation of existing businesses into new developments and relocation support in close proximity where there is risk of displacement. One of the ways in which to ensure this type of space can be incorporated is through a managed workspace provider to include shared service charges and facilities. Southwark has a Workspace Provider List to help encourage the incorporation of purpose-built new business space suitable for a wide range of SME businesses. The council recommends the approach be referenced in the policy reasons for low-cost business space as well as affordable workspace.</p>
Policy E3	Affordable workspace	<p>The council considers that the definition of affordable workspace to be secured through planning obligations at rental values below market rates in Part A1-5 is helpful. This is consistent with Southwark’s approach relating to not-for-profit organisations or existing businesses operating at affordable rents in the OKR Opportunity Area and support for small and independent businesses in the New Southwark Plan. The additional types of affordable workspace identified for social or cultural value businesses, disadvantaged groups, educational outcomes and start-ups is welcome. Further guidance would be useful in terms of how to target these types of businesses in new development proposals.</p> <p>Affordable workspace policies are contained in the New Southwark Plan and the Old Kent Road AAP including encouragement of early engagement with workspace providers and security through Section 106 agreements. This approach is consistent with parts A-D of the policy. Part E requires leases or transfers of space to workspace providers at sub-market rents, however it is recommended this should be set within the context of the types of space provided in part A of the policy. This is because some workspace providers will provide space at market rents which accommodate a range of business needs and may be more affordable by their nature as a shared, managed facility. Workspace providers can provide for a range of business needs. Part F of the</p>

		<p>policy is considered to be too onerous, as it may not always be possible to ensure the operation of affordable workspace elements of a mixed-use scheme prior to residential occupation, particularly with larger schemes that may be phased.</p> <p>On policy E3 B 1), whilst the council would certainly take into account existing affordable workspace on any site, the council is concerned the policy, as currently drafted, could have the unintended consequence of incentivising landowners/developers to remove such businesses from sites before making planning applications, or simply not offering short term leases prior to development. This may also impact HC5 and its suggestion that spaces are used for pop up and temporary creative uses.</p> <p>E3 F requires affordable workspace to be occupied prior to residential elements being occupied. Developers will need to generate cash flow as early as possible rather than being at significant financial risk to a third party commercial agreement.</p> <p>6.3.4 Links affordable housing to creative spaces, i.e. cheap homes for creatives. This does not appear to be cross-referenced in the New London Plan housing policies. As such it is not at all clear how the Mayor envisages this aspiration could be achieved.</p>
Policies E4-E7 summary	Industrial land and SILs	<p>The council is concerned policies E4-E7 are incoherent as they do not appear to align with each other. Policy E4 sets out the role of SIL, LSIS and non-designated industrial sites and the industrial and related functions identified for SIL in part A are clear. Figure 6.2 identifies the areas that are classified as Strategic Industrial Locations. For Southwark this is Area 1 - the Bermondsey, Old Kent Road and Surrey Canal Central Services Area identified in Table 6.3. However part C cross-references Policy E7 relating to SIL consolidation to support the delivery of residential and other uses allowing for some SIL release (illustrated in Figure 6.3). It is clear this can only be done through a plan-led process.</p> <p>Most of the current adopted SIL land in Southwark in this area is within the Old Kent Road opportunity area. The AAP/OAPF sets out a plan-led approach for the re-designation of some areas of SIL to mixed use neighbourhoods, however retaining industrial capacity (as required in Table 6.2) is a key part of the masterplanning in relation to mixed use.</p> <p>Southwark's approach, as set out, in the AAP/OAPF is to</p>

		<p>clearly define the areas that are retained as SIL (for the uses identified in E4 Part A and E5 Part C only) and a strategy for intensification for these areas is planned (consisting of 26 hectares), which is consistent to some extent with Policy E7 regarding making more efficient use of industrial sites for industrial uses only.</p> <p>Whilst the AAP/OAPF requires mixed use development on the remainder of the sites currently adopted as SIL, this is proposed with the intention to continue maintaining employment floorspace, including industrial uses, in an innovative new approach to mixing uses. Whilst the London Plan acknowledges local plan-led approaches to SIL consolidation, it is not considered that it is possible to designate Area 1 as SIL as this would need to comply with the uses identified in Part A of E4 and Part C in Policy E5. Whilst Policy E5 Part D does make an exception to refusing residential development and other uses in areas of SIL consolidation through the plan-led process, continuing to designate SIL in areas identified for SIL consolidation or local plan-led masterplanning, would appear to put these policies in conflict with each other. It would not be possible to designate SIL for particular uses not including residential development, but then also require 50% affordable housing delivery on these sites as required by Policy H6.</p> <p>Recommendations</p> <ul style="list-style-type: none"> • Policies E4-E7 could be condensed and made clearer with respect to the purpose of SILs and SIL consolidation. • Area 1 should not continue to be identified as SIL in its entirety as this is in conflict with the plan-led approach to change and consolidation as supported by the policies. It is suggested Area 1 could continue to be identified for the industrial property market area designation; 'Central Services Area' but acknowledge that the required retention of industrial capacity will be accommodated in smaller areas of SIL intensification as well as through mixed use development. This is in acknowledgement of the opportunity area status of Area 1 which is at an advanced stage of AAP/OAPF plan preparation and is expected to deliver significant growth in housing in addition to a range of complementary uses to support transformation of the area facilitated by the Bakerloo line extension. <p>The policies should recognise and support the benefit of mixed use development in delivering industrial uses with</p>
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		new residential development. Whilst this is a relatively new concept, it is considered an effective way to ensure priorities for both industrial and residential development can be accommodated across large areas. Southwark is within the Central Services Area where last-mile and just-in-time servicing are in demand. These types of uses are being planned for in mixed use development on a large scale to ensure competing demands are met within the constraints of land available in central London.
Policy E4	Land for industry, logistics and services to support London's economic function	In relation to Part G, Southwark Council has introduced an Article 4 Direction to remove permitted development rights for change of use from light industrial to residential in line with this policy. This is in recognition of the requirement to retain industrial capacity or ensure it is re-provided through mixed use proposals where this is proposed in the development plan.
Policy E5	Strategic Industrial Locations (SIL)	The council agrees that local development plans should be used as the basis for making more efficient use of Strategic Industrial Land, and agree that the proposed uses identified in Part C are appropriate for SIL designations. The process of SIL consolidation identified in Part D is unclear. It is suggested that the process of SIL consolidation allows for mixed-use development which retains industrial capacity where brought forward by a plan-led process and coordinated masterplanning.
Policy E6	Locally Significant Industrial Sites	No comments.
Policy E7	Intensification, co-location and substitution of land for industry, logistics and services to support London's economic function	<p>The council agrees in principle to the plan-led approach to SIL intensification and to retain industrial capacity. The council also supports collaboration with neighbouring authorities relating to sub-regional and regional industrial property markets. Southwark Council is currently working with Lewisham Council and has explored opportunities further afield with the GLA relating to industrial relocation strategies for such uses that do not need to be prioritised in the Central Services Area but do need to be accommodated in Greater London.</p> <p>It is requested the policy also recognise the range of employment functions required in the Central Services Area that will also need to be accommodated in central opportunity areas such as the Old Kent Road. The OA is located in the CAZ fringe and will be located close to strategic transport infrastructure when the Bakerloo line extension is complete. As such a wider range of employment opportunities will be provided for ranging from industrial uses to offices. There is already a range</p>

		<p>of uses in SIL Area 1 including creative industries, offices and manufacturing reflecting the diverse range of industrial and employment uses in this location. It is considered the innovative approaches to mixed use development to support and grow this diverse range of uses should also be provided for within the policy.</p> <p>Regarding Part E3, it may not always be possible to ensure industrial uses are operational prior to residential uses. The policy wording should reflect this reality.</p> <p>The illustrations in Figure 6.3 are useful in explaining the approach to SIL consolidation. However it is considered difficult to ensure that this process could be achieved in the Old Kent Road (Area 1) due to complex land ownerships and phasing of development. The council considers figure 6.3 could be improved to clarify that the functionality of existing B8 servicing yards must be retained (where they currently serve adjacent B8 premises and are integral to the B8 premises functioning) where new 'multi-storey' B8 yards units are provided. The figure as currently presented implies the servicing yard for adjoining B8 units could be lost. The policy should encourage a comprehensive approach to redevelopment of such sites that would consider appropriate phasing and ensure the opportunities to secure the ongoing operation of occupiers are maximised.</p> <p>A wider collaborative approach is required in relation to industrial uses, intensification and relocation; however there are some areas the council is actively pursuing for this purpose in Area 1, including South Bermondsey proposed retained SIL. The AAP/OAPF demands a complex mix of uses at high densities to promote confidence in and achieve the aims of the opportunity area framework including attracting major transport infrastructure in the Bakerloo Line extension. These significant and ambitious proposals for central London, including the incorporation of innovative mixing of industrial uses with residential uses, goes beyond the core requirements of SIL and this approach should be recognised and supported in the policies.</p> <p>Regarding E7 E 3 (which states that “the intensified industrial, storage and distribution uses are completed and operational in advance of any residential component being occupied”) the council is concerned it would deter funders from investing in what are likely to be complex, innovative and expensive developments. Developers will need to generate cash flow as early as possible rather</p>
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		than being at significant financial risk to a third party commercial agreement. Given the significant physical and cost investments that this kind of mixed use will require it would seem highly unlikely that units would be left purposefully empty. The policy in effect creates a ransom position for would be commercial occupiers.
Policy E8	Sector growth opportunities and clusters	The policy complements the Mayor's Economic Development Strategy and is supported by the council. A range of employment opportunities and suitable workspaces for a diverse range of sectors, including flexible workspace for start-ups, micro-enterprises, SMEs and move-on businesses is supported. The encouragement of innovation, research and development and the development of higher and further education institutions is welcomed and encouraged. The council supports the promotion of specific clusters to grow including cultural and creative industries and opportunities for the designation of Creative Enterprise Zones.
Policy E9	Retail, markets and hot food takeaways	<p>The policy is supportive of a diverse retail sector within town centres, including planning for additional comparison goods retailing in major town centres and ensuring communities are well served by convenience goods retail. The policy supports London's markets that contribute to the vitality of town centres and the CAZ. The policy encourages comprehensive redevelopment of out-of-town retail parks for a diverse mix of land uses including housing and decreasing car reliance. Large scale retail development over 2,500sqm should support the provision of small shops. These principles are supported and consistent with the New Southwark Plan policies.</p> <p>The council supports the policy approach whereby hot food takeaways (use class A5) should not be permitted within 400m walking distance of any existing or proposed primary or secondary school.</p> <p>The policy should provide standards for extraction flues including the need for suitable odour abatement plant and clarity on preference for high level extraction.</p>
Policy E10	Visitor infrastructure	The council supports the provision of visitor accommodation in town centres and opportunity areas within the CAZ. However, the provision of strategic office space in the CAZ should continue to be prioritised where it is at risk of loss.
Policy	Skills and	This policy is supported and consistent with Southwark's

E11	opportunities for all	<p>ambitious policies and programmes for construction and other skills development.</p> <p>The council supports the aim of getting more people into construction employment across London and thinking innovatively about how to achieve this. The proposed sharing of S106 opportunities across borough boundaries has potential to open up mobility in accessing opportunities in construction across London and the council remains committed to supporting cross-borough work.</p> <p>However it is also recognised among boroughs that further measures to address the supply of skilled labour are urgently needed as a priority to properly address the challenges employers face. There is no surplus of construction skills in one part of London that needs distributing more evenly, without a focus on improving numbers entering the sector and accessing skills, the approach proposed in Part B risks simply rearranging the existing shortage of labour supply.</p> <p>Improving the supply of skills is the central issue facing the construction sector. The council would encourage every effort to explore how the Mayor can improve intelligence, coordination and quality of construction skills provision. The council would welcome the opportunity to be part of this conversation and share learning from developing the Southwark Construction Skills Centre.</p> <p>Given the strength of Southwark’s current local arrangements, there are a number of potential implications in the policy as currently proposed that require further consideration. These are:</p> <ul style="list-style-type: none"> ○ The potential for levelling down of s106 policy and delivery models, which are strong (and strongly enforced) in Southwark. ○ Implications for supporting unemployed Southwark residents into sustained construction work, which is relatively successful under existing arrangements. ○ Resourcing implications related to s106 financial contributions. <p>Before Part B of the policy is adopted in the London Plan in its current form, the council suggests further work be undertaken to test these complexities, demonstrate benefits and avoid disadvantage to any authority or other unplanned consequences.</p>
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Chapter 7: Heritage and culture		Detailed comments
Policy HC1	Heritage conservation and growth	<p>The council recommends the guidance relating to heritage significance (7.1.7) should be amended to reference the historic use of the building, which may be the reason behind the original designation and significance.</p> <p>The council considers HC1A should clarify what constitutes 'evidence' that demonstrates London's historic environment.</p> <p>The council also recommends the policy should explicitly consider the relative importance of Grade I and Grade II listed buildings.</p>
Policy HC2	World Heritage Sites	<p>The policy is broadly supported by the council but it is considered the policy lacks clarity. The policy gives no sense of assessment of the views – i.e. what development would be considered acceptable and what development would be unacceptable?</p>
Policy HC3	Strategic and Local Views	<p>The policy supports the designation of Southwark's new local views, as set out in the New Southwark Plan.</p> <p>The council recommends the Mayor use the opportunity of the new London Plan to designate new Strategic Views where they are proven to offer unique views of Strategically-Important Landmarks that make a very significant contribution to the image of London at the strategic level.</p> <p>South London has few existing designated Strategic Views in comparison to the array of views of Strategically-Important Landmarks from viewpoints across north London. The preparation of a new London Plan offers the opportunity to address this anomaly and consider the designation of proven, new Strategic Views from South London, and specifically Southwark.</p> <p>The proposed New Southwark Plan borough views of St Paul's Cathedral from One Tree Hill and Nunhead Cemetery are worthy of Strategic View designation through the new London Plan as they offer unique viewing perspectives and experiences of St Paul's Cathedral from publically accessible points. The view from Nunhead Cemetery is particularly unique.</p> <p>The designation of these two views in the New London Plan would acknowledge and safeguard the unique viewing experience of St Paul's Cathedral, that is</p>

		<p>comparable if not better, than existing designated views of the Cathedral from the North; and recognise Southwark’s strategically important location as part of central London.</p> <p>The council welcomes the opportunity to work with the Mayor to explore the designation of these views and have prepared a robust evidence base to support this.</p> <p>Although borough collaboration is suggested in Policy HC3.G where adjoining boroughs facilitate an important view from one borough through another, it should be recognised that if agreement is not reached between boroughs, important views may not be able to be protected. As such the Mayor should consider these views for Strategic View designation if they meet the required thresholds.</p> <p>The identification and protection of Protected Silhouettes of Tower of London and its OUV is suggested in HC3.D. A Protected Silhouette could potentially be a constraint to the delivery of new tall buildings at London Bridge if, for example, a silhouette in a view from the north east of the Tower (e.g. from Royal Mint towards the Tower) is protected. It should be noted that this is a key area of growth in London Bridge Opportunity Area.</p> <p>An update to the LVMF SPG is suggested in Policy HC3.E. The council has concerns over the potential extension of background assessment area of Strategic Views, if they limit the development potential of Old Kent Road Opportunity Area. The council welcomes the opportunity to be part of further discussions regarding this.</p>
Policy HC4	London View Management Framework	No comments.
Policy HC5	Supporting London’s culture and creative industries	No comments.
Policy HC6	Supporting the night-time economy	The council supports the classification of night-time economy areas in the CAZ, Peckham, Elephant and Castle and Canada Water in Southwark as identified in Annex 1. The council supports the diversification of night-time activities and measures to ensure safety and activity in the ambition for a 24-hour City. The council recommends Old Kent Road is also classified as an area for the night-time economy.
Policy	Protecting public	This policy supports the protection of pubs for their

HC7	houses	heritage, economic, social and cultural value. The policy is consistent with Southwark's strong policies to protect pubs in the New Southwark Plan. The council brought in an Article 4 Direction prior to the change in the GDPO which assessed Southwark's pubs for similar criteria outlined in paragraph 7.7.6 and outlines the strong commitment to securing the continued use and value of pubs. Part B of the policy requires authoritative marketing evidence to be submitted for applications that propose the loss of public houses and the supporting text requires 24 months of marketing following an independent valuation. It is suggested that this requirement could be incorporated into the policy itself to strengthen this requirement.
Chapter 8: Green infrastructure and Natural Environment		Detailed comments
Policy G1	Green infrastructure	The policy is broadly aligned with the council's approach to green infrastructure. The council considers the policy (G12A) should reference trees in private ownership and those in open spaces and not just street trees.
Policy G2	London's Green Belt	No comments
Policy G3	Metropolitan Open Land	Paragraph 8.3.2 makes a reference to land swaps. Elsewhere in the plan land use swaps are suggested for developers to meet their obligations off-site. In this case that would be inconsistent with policy G3 which seeks to prevent harm to MOL and for any alterations of MOL to be made through the Local Plan process. The mention of land swaps in the supporting text is therefore unclear. The council recommends the Mayor to clarify what is meant by 'land swaps' in the context of this policy.
Policy G4	Local green and open space	The council recommends the requirement to undertake an assessment of local green and open space should take account of quantity and quality.
Policy G5	Urban greening	The council supports the introduction of the Urban Greening Factor. The New Southwark Plan requires major development to provide green infrastructure and policy G5 provides a mechanism to quantify that contribution. It is assumed that the final sentence of G5 B is intended to set a target score to be achieved up until boroughs set their own targets. If that is the case it would be improved by making a clear statement that development should meet this target. The current wording is unclear.

		<p>For urban greening to deliver effective green infrastructure and to be consistent with policy G1, policy G5 should be amended to require that greening is designed to deliver multiple benefits and will be managed for the long-term.</p> <p>The policy should require any trees in the development to be planted in such a manner that will not create areas that would hinder the dispersion of pollution. With any green infrastructure, there should be an obligation for the proper maintenance and any necessary replacement of it for a number of years after the development is completed.</p>
Policy G6	Biodiversity and access to nature	<p>The council considers policy G6D could be more ambitious by requiring all development to consider opportunities to achieve a net gain in biodiversity. The New Southwark Plan seeks contributions towards a net gain in biodiversity by requiring development to provide features such as green and brown roofs, green walls, soft landscaping, nest boxes and habitat restoration and expansion, improved green links and buffering of existing habitats.</p>
Policy G7	Trees and woodlands	<p>The council considers policy G7C (which requires the retention of “existing trees of quality”) should not be restricted solely to Category A and B trees. The policy, as currently drafted, risks the removal of lesser quality trees which are integral to the composition and ecological quality and functioning of woodlands or groups of trees which are of significant amenity and biodiversity value.</p> <p>Note [108] should therefore read “Category A and B specimen trees and lesser category trees in woodlands and groups where these are of importance to amenity and biodiversity, as defined by BS 5837:2012, and Natural England and Forestry Commission standing guidance 2018: https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences”.</p> <p>The policy aims to achieve an increase in tree canopy cover of 10% by 2050. Officers consider the increase needs to be measured from a baseline. The council recommends the policy requires boroughs and developers to assess the existing canopy cover area within their boundaries so that this target can then be measurable. The policy wording should state that the baseline and 2050 figures should be reported.</p>

		The council considers the policy should recognise that ancient woodlands are heritage assets and a reserve of preserved archaeological interest.
Policy G8	Food growing	The council considers the policy would be strengthened by adding reference to the previous land uses to avoid the reuse of polluted soil for food growing purposes.
Policy G9	Geodiversity	No comments.
Chapter 9: Sustainable Infrastructure		Detailed comments
Policy S11	Improving air quality	<p>The council recommends the policy highlight that particular care should be taken where development is nearby to existing sources of air pollutants, such as waste management sites.</p> <p>The council supports the requirement for development to reduce emissions from the demolition and construction of buildings.</p> <p>The council supports the hierarchy of emissions reduction, with on-site measures preferable to off-site. The New Southwark Plan also specifies that specific off-site measures should be provided in preference to a financial contribution. The London Plan could support this approach.</p> <p>The council considers developments in Air Quality Focus areas should also achieve an Air Quality Positive Approach. The council would welcome further guidance from the Mayor to define the requirements of a preliminary AQA.</p>
Policy S12	Minimising greenhouse gas emissions	<p>The council supports the requirement for major development to be zero carbon following the energy hierarchy. The council also agrees with the management of construction demand and the use of secondary heat sources to achieve that.</p> <p>The New Southwark Plan applies the energy hierarchy to minor development, without the expectation that they must demonstrate zero carbon but to nevertheless follow best practice in reducing energy demand.</p> <p>The New Southwark Plan requires major development to achieve 40 % reductions beyond 2013 Building Regulations. Policy S12 could support such ambitious reductions. Where this target cannot be met, developments would contribute to a carbon offsetting fund. We have established our fund and are developing spending projects.</p>

		<p>The council supports the monitoring of building performance after completion of development and for an online portal to collect this data. This should support efforts to close the performance gap, which cannot be achieved by boroughs alone.</p> <p>The council supports the integration of air quality, overheating considerations and smart metering in energy strategies. Smart metering could be given more prominence in the policy itself.</p> <p>Paragraph 9.2.10 gives guidance on energy statements. At point i) it states they should “explain how the site has been future proofed to achieve zero-carbon on site emissions by 2050”. Such future proofing could make a significant difference to London’s ability to meet its CO2 reduction target. This could be made more prominent by making it a requirement of policy SI2.</p>
Policy SI3	Energy infrastructure	<p>The council supports the proactive planning of energy infrastructure in areas of largescale redevelopment. This is an important step in ensuring the delivery of decentralised energy networks. They have significant potential to reduce London’s carbon footprint but take up has so far been slow. The council is pursuing this with assistance from the Mayor through the Decentralised Energy Enabling Project for the Old Kent Road Opportunity Area Decentralised Energy Feasibility Study. On-going support for boroughs will be important to make best use of the expertise at GLA.</p> <p>The council supports the integration of air quality considerations with energy infrastructure planning, and the inclusion of ultra-low NOx gas boilers and communal/district heating systems.</p>
Policy SI4	Managing heat risk	<p>The council considers guidance in paragraph 9.4.5 should also include a section on assessing and mitigating overheating risk in new development and meeting the necessary internal noise criteria for the development.</p>
Policy SI5	Water infrastructure	<p>The council considers SI5 C3 could be strengthened to require the water efficiency measures listed rather than just encouraging their provision. Water efficiency will be essential to manage London’s scarce water supply.</p>
Policy SI6	Digital connectivity infrastructure	<p>No comments.</p>
Policy SI7	Reducing waste and supporting the	<p>The council supports the ambitious target for the recycling of construction, demolition and excavation</p>

	circular economy	waste and for referable applications to demonstrate how they will be net zero-waste.
Policy SI8	Waste capacity and net waste self-sufficiency	The council supports boroughs collaborating by pooling apportionment requirements and paragraph 9.8.7 which acknowledges that it will not always be possible or practicable for individual boroughs to meet apportionment targets.
Policy SI9	Safeguarded waste sites	The council supports the plan-led approach to the release of waste sites for development and the increased flexibility to plan across borough boundaries. However, it may not be necessary or appropriate to directly compensate for the entire throughput. Part of the necessary capacity could be provided in advance of the redevelopment of waste sites. Para 9.9.3 states “it may be possible to justify the release of waste sites without capacity re-provision if it can be demonstrated that there is sufficient capacity available elsewhere at appropriate sites over the Plan period. In such cases, sites could be released for other land uses.” For clarity the council suggests this flexibility is reflected in the policy as well.
Policy SI10	Aggregates	The council recommends the policy should note high archaeological impact of mineral extraction and mention assessment/mitigation requirement in Part D. It is requested that in addition to Part D it is stated Development Plans should require adequate evaluation and mitigation of archaeological impact because minerals extraction can be immensely destructive of archaeological remains over large areas. Gravel deposits were particularly attractive for early agricultural communities as a result of which such deposits are known to be rich in archaeology along the entire length of the Thames Valley.
Policy SI11	Hydraulic fracturing (Fracking)	The proposed refusal of all proposals for hydraulic fracturing is supported so that boroughs and the Mayor can meet greenhouse gas emission targets and to protect London’s scarce water supply.
Policy SI12	Flood risk management	The council supports the implementation of the Thames Estuary 2100 recommendations, which has been addressed in the New Southwark Plan.
Policy SI13	Sustainable drainage	The aim to achieve greenfield run-off rates is supported and policy SI13 could be amended to state that this must be achieved. The Old Kent Road Integrated Water Management Strategy includes recommendations for an offset policy, and an approach to strategic sustainable urban drainage measures where on site greenfield run

		<p>off rates are not feasible. This will operate to achieve the aims of the new London Plan policy. The policy would be improved with explicit reference to offsetting, whether through retrofit of the existing built environment or through strategic green infrastructure.</p> <p>Point D of the policy could be strengthened to emphasise the multiple benefits of SUDS integrated with green infrastructure and require these to be considered in their design. These include urban heat management and health improvements.</p>
Policy SI14	Waterways – strategic role	No comments.
Policy SI15	Water transport	<p>The policy encourages the use of water transport for freight and passengers. The policy also safeguards existing boatyards from development unless the facilities are re-provided.</p> <p>The council recommends the policy be revised to acknowledge that improvements to existing boatyards may be achieved by means of rationalisation and therefore a quantitative net loss may be acceptable.</p> <p>The council recommends the following wording: ‘Existing boatyard capacity should be protected and development proposals to increase their capacity or range of services should be supported. The alternative use of boatyard sites should be accepted if the existing capacity and facilities of the site are re-provided within the site or at an alternative site with equivalent capacity and facilities.’</p>
Policy SI16	Waterways – use and enjoyment	No comments.
Policy SI17	Protecting London’s waterways	No comments.
Chapter 10: Transport		Detailed comments
Policy T1	Strategic approach to transport	<p>The policy sets out the Mayors strategic aspirations for transport. Particularly that 80% of trips in London should be made by foot, cycle or public transport.</p> <p>The council recommends the following amendments to Paragraph 10.1.3: The first sentence should include the phrase “and timing of deliveries (just in time), especially in relation to construction traffic, so as to avoid unnecessary movements and concentration of delivery vehicles on the highway.”</p>
Policy T2	Healthy Streets	The council recommends the following amendments: T2.A - The phrase “That reduces the need for residents

		<p>to make motorised journeys” should be appended to this sentence.</p> <p>T2.D – The sentence “Development proposals in their implementation should ensure that proper safeguards are in place to preserve or minimise impact on existing healthy streets (e.g. having a Construction Management Plan incorporating dust/noise suppression measures and consolidation/co-ordination of deliveries etc), should be added as Item 4.</p>
Policy T3	Transport capacity, connectivity and safeguarding	No comments.
Policy T4	Assessing and mitigating transport impacts	<p>The council considers in assessing and mitigating transport impacts in paragraph E, there should be emphasis to include the need for an environmental assessment as well.</p> <p>The council recommends the following amendments: T4.B - The phrase “plus other borough policies/guidelines” needs to be added.</p> <p>T4.E - The phrase “as well as associated effects on public health” should be deleted because it is intuitive in the remaining part of this sentence that effects on public health are being considered.</p> <p>T4.F – The phrase “and where increased road danger is perceived, proper remedial measures must be put into place prior to their execution or occupation”, should be appended.</p> <p>Paragraph 10.4.4 – The phrase “and active travel infrastructure” should be included (after the word ‘connectivity’) in the last bold sentence.</p>
Policy T5	Cycling	The council recommends the following amendments: T5.F – Clarification is required as this statement appears to contradict the minimum (from) used in Table 10.2 e,g A1 use – From a threshold of 100m ² , 1 per 175m ² GEA.
Policy T6 Policy T6.1 Policy T6.2 Policy T6.3 Policy	Car parking Residential parking Office parking Retail parking Hotel and leisure uses parking Non-residential disabled persons	<p>The council recommends the following amendments: T6.B – The phrase “taking into account other factors such as availability of on-street car parking spaces and identified car parking pressure in the vicinity of the development”, should be added.</p> <p>T6.I – This should be rephrased for clarity as “Where sites with existing car parking facilities are being</p>

T6.4 Policy T6.5	parking	<p>redeveloped, re-provision of car parking spaces should reflect current approach.”</p> <p>T6.1.C - We would ask that this be reconsidered because there is no evidence that all vehicles in future would be fully electric but are likely to form a combination of hybrid vehicles with no requirement for plug-in EVC and fully electric vehicles, with the respective projected proportions being unclear at present. It would therefore be more practical to start with the currently adopted 20% active plus 20% passive EVCP's plus a developers' obligation to increase these periodically based on the magnitude of increase in the number of electric vehicles in the development, until the 100% active/passive EVCP's level is attained.</p> <p>T6.3 – Paragraph 10.6.16 – The phrase “so that it does” should be changed to “so that it does”.</p> <p>T6.4B – It is unclear why locations of PTAL3 should be included. Normally, locations of PTAL 3/4 are classed as “moderate/medium” while 5/6 are categorised as “high”.</p>
Policy T7	Freight and servicing	No comments.
Policy T8	Aviation	No comments.
Policy T9	Funding transport infrastructure through planning	No comments.
Chapter 11: Funding the London Plan		Detailed comments
Policy DF1	Delivery of the Plan and Planning Obligations	<p>The council agrees that viability testing should only be undertaken on a site-specific basis where there are clear circumstances creating barriers to development.</p> <p>The council recommends the Mayor does not allow for site-specific exceptional or abnormal costs (which may include ‘issues such as high levels of contamination, requirement to divert major utilities, poor ground conditions necessitating special foundations/ ground works’ (Affordable Housing and Viability SPG). It is one of the inherent risks of being a developer and should not be a factor for planning policy. The presence of such issues will impact land value and the cost should <u>never</u> be born through a reduction in Planning Obligations. The consultant doing the due diligence will need to have professional indemnity insurance to cover any oversight on their part in reporting to their client. Where liability is qualified by the consultant, then the developer should build in sufficient contingency to cover any unknowns.</p>

		<p>The policy notes that where viability is a genuine issue, boroughs should prioritise affordable housing and necessary transport infrastructure. The council recommends the Mayor considers special exemptions to this where a site can contribute towards the delivery of essential social infrastructure such as education or health facilities and acknowledge this may be given elevated priority over affordable housing or transport infrastructure. This is particularly important where the planning authority does not own land or where social infrastructure can be best provided on a mixed-use private-led scheme.</p>
Chapter 12: Monitoring		Detailed comments
Policy M1	Monitoring	<p>This policy sets out KPIs that will be used to monitor the implementation of the plan.</p> <p>It is recommended monitoring targets covering tree canopy cover.</p>