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Dear Sadiq,

Southwark Council's response to "A City for All Londoners" consultation.

Thank you for the opportunity to give our views on "A City for All Londoners". Our full response to the consultation is attached and we are broadly aligned with the ambitions outlined in the document.

Southwark welcomes the "good growth" approach to developing a city where anyone can thrive and be supported regardless of their needs. Indeed, many of the regeneration projects in our borough are already following this approach. Opportunities to improve the transport capacity and connections in south London are encouraged, though we would value an overarching assessment of how growth can be supported by transport functions and vice versa.

A growing economy needs to be supported by a skilled workforce, and in Southwark we are committed to ensuring residents of all ages and abilities have access to the opportunities available across the city. By 2018 we aim to have supported 5,000 residents into employment, and we have already helped more than 3,000 residents secure a job. Where our residents need to grow their skills, we are working with partners to deliver new offers such as the Southwark Construction Skills Centre, which you visited in September. The devolution of the Adult Education Budget presents yet another opportunity to ensure Southwark residents have access to a skills offer that is relevant, local, and fit for purpose.

The various housing proposals outlined in "A City for all Londoners" have our broad support, and we note the recent publication of "Homes for Londoners". In 2015, Southwark Council agreed a new housing strategy which included a target to build 11,000 council homes over 30 years, and we look forward to working with you to ensure a good range of affordable options are delivered in Southwark.

We fully recognise the importance of London's culture sector, which is unique, in its vibrancy and innovation, and we are proud to host so many cultural landmarks and institutions in Southwark. Our Cultural Strategy will influence or directly deliver cultural activity in the borough, from opening seven new theatres to delivering new commissions in conjunction with partners. The cultural economy is crucial to London's growth, and we urge you to support places and spaces that nurture the talent and ideas that are so critical to the success of the sector.

We welcome steps to improve the health of our high streets and reduce health inequalities, but the focus needs to extend beyond walking and cycling. We want our high streets and town centres to be places where making healthy choices is easy. To do this we need to make sure shops, public spaces and transport amenities work together to support healthy choices. Similarly the valuable role that leisure centres, parks, libraries have in helping people lead healthy, active lives should not be overlooked. We treasure and invest in these spaces in Southwark, because they help improve the borough's health and wellbeing and are part of the social infrastructure that "A City for All Londoners" seeks to nurture.

We thank you for the opportunity to give our views and we hope that these comments will be used to inform forthcoming strategies.

Yours sincerely

Councillor Peter John, OBE
Leader of the Council

Southwark Council's Response to "A City for All Londoners" Consultation

December 2016

1. Accommodating Growth

Employment land in central London

The Central Activities Zone is identified as having a job creating role, and we welcome the Mayors intention to resist conversion of offices to residential space in this area.

Employment land across the city

The paper identifies the absence of river crossings in the east of London as a constraint and states that the Mayor will progress plans for a new bridge for pedestrians and cyclists between Rotherhithe and Canary Wharf which Southwark Council supports. Southwark Council has also identified this as a project for funding on our Community Infrastructure Levy section 123 list, and while we welcome the health and economic benefits that the bridge may support, we encourage any decisions to be rooted in evidence of demand and support from wider stakeholders.

Good growth

Southwark has demonstrated successful examples of the application of the "good growth" agenda at Elephant and Castle, and we support the pursuit of "good growth" to avoid problems associated with single use development; early planning to identify the cultural, health and green growth requirements; and accessible and affordable housing built to decent space standards.

Available resources must be directed to growth areas to ensure delivery of the "good growth" agenda. The designation of Housing Zones to support growth at Canada Water and Old Kent Road is a good start. However, "good growth" is broader than just housing. Budgets need to be pooled to support all aspects of this agenda, including transport, otherwise there is a concern that admirable objectives will not be delivered. Investment in broadband at Canada Water is also a priority to support growth, as it will enable residents and businesses to take advantage of digital services and support our vision for a modern, well connected, growing neighbourhood.

Cultural capital

Southwark Council is working smarter to achieve new cultural provision that benefits the whole of London, with seven new theatre buildings already open or agreed – these include Theatre Peckham, Skipton House, Mountview Academy of Theatre Arts, The Bunker, The Spanish Theatre Company, Union Theatre and The Bridge.

Local authorities do not necessarily need to be the developers for new cultural places as the value of cultural facilities is well recognised by developers, especially in London. Where developer contributions have been provided we have seen some very exciting commissions such as “Full Stop” at More London, and “Poured Lines” on Southwark Street. We will see significant enhancements to our portfolio in the next two years with the Shard commission and Network Rail.

We are encouraging and working with developers to take on a greater role in supporting the boroughs cultural offer and shoulder the financial cost to ensure the development of these assets, though achieving this goal requires supportive planning policy. We welcome the Cultural Infrastructure Plan and look forward to more detail on how this will be achieved and applied.

The intention to protect creative workspace in the London Plan will support the efforts and successes already achieved in Southwark. However, the Planning Policy Framework could be strengthened to protect B1 office space/light industrial space which might be low cost and attractive to the creative sector. The Government has recently amended permitted development rights to allow change of use from B1 office to residential without the need for planning consent. We have secured an opt out from this in the Central Activities Zone until 2018, however there is no protection in other major centres such as Elephant & Castle, Peckham and Camberwell, where arguably these types of buildings are more affordable to the sector. A London policy framework to support such initiatives would enable us to protect workspaces for the creative sector beyond the Central Activities Zone.

We encourage the Mayor to address issues around large land owners which are currently housing creative business, such as Network Rail who are seeking to maximise rents, which makes it challenging for arts organisations to run viable businesses. Furthermore if the government pursues its proposal to privatise the ownership of the rail arches, the problem of high rents could be exacerbated.

Infrastructure for people and communities

We welcome the commitment to improve community based healthcare facilities and the focus on chronic conditions and the aging population. The provision of NHS services to meet demographic changes is essential and we welcome the identification of the planning of the health and community premises infrastructure as being essential to the growth of London.

However, it is disappointing to see a lack of focus on open spaces and leisure facilities; both are part of the physical infrastructure and supportive of social infrastructure, and key to supporting and encouraging social interaction and thriving town centres - this is evident in Southwark, where 25 of our parks have achieved green flag status and our newly opened Castle Leisure Centre has proved to be a popular facility in the heart of the borough.

Changing the way we travel

While active transport (walking and cycling) is a key aspect of ‘healthy streets’, there are other important pieces of the jigsaw. As people walk and cycle more, and are more engaged with their surroundings, the streets themselves need to be ‘healthier’ spaces i.e. places that allow the healthier choice to be easier choice and should therefore also provide smoke free open spaces, including smoke free outdoor seating and a healthier food and drink offer.

Increasing transport capacity

We fully support the proposals to increase rail and tube capacity, but note that the proposals for addressing bus overcrowding are less developed and will require a significant reconsideration of how key user groups are supported at peak times to address severe overcrowding (such as the needs of workers and school children).

2. Housing

We agree that London needs a tailored approach to its unique housing market. The growing gap between private house prices/rents and average incomes has resulted in extremely high demand for affordable housing. Therefore we welcome the strategic target that 50% of new build housing will be affordable, though believe this will be very challenging given the current low base across London.

The proposal that housing should be intensified around new and existing transport hubs has our full support, and we are already implementing this approach through two agreed Housing Zones in the borough, at Canada Water and Old Kent Road. We also agree that we need to work with a range of types of housebuilders, from larger players to smaller house builders.

We welcome the move towards developing genuinely affordable rented housing. Since the affordable rent product was introduced Southwark Council has been concerned that affordable rents at higher proportion of market rent were unaffordable to a large number of households in housing need. As a result, in 2015, Southwark Council agreed a new housing strategy which included a target to build 11,000 council homes over 30 years. We note the commitment and funding to develop a range of homes going forward, under the three proposed types:

- London Affordable rent (at rents close to target rent)
- London Living Rent (at rents based on 1/3rd of local incomes)
- Shared ownership.

We will need to explore how we can work with the Mayor on ensuring a good range of all three of the affordable options are delivered in Southwark. Furthermore we are interested to learn how the £3.15 billion housing deal announced in the Autumn Statement will be used to deliver public and private homes at scale.

Whilst the council supports helping people to achieve home ownership, there are a number of households for whom this is not possible, therefore the move to developing London Living Rent homes with rents linked to incomes is a step in the right direction. We also need to ensure there is a sufficient housing offer to residents who do not qualify for the various housing schemes that are either on offer, or being proposed. These residents need sufficient numbers of new lower rent properties to help reduce council housing registers.

We note the intention to review how planning policies can recognise the distinct economics of build to rent. As a borough we support the development of purpose built private rented developments as these can help to meet particular types of housing need. However, we believe this needs careful consideration to ensure that this is not at the expense of affordable housing provision.

Improving the private rented sector is a priority for the Council which is why we have introduced a selective licensing scheme in Southwark. We welcome the Mayor's support for boroughs to introduce their own schemes where they choose to do so, and evidence supports this.

We look forward to working with the Mayor of London around ideas for reducing rough sleeping and around preventing homelessness, as well as opportunities to better coordinate with other boroughs on issues such as procuring temporary accommodation.

3. Economy

Working with the world

C40 Cities Climate Leadership Group is identified in the context of a good example of international collaboration in tackling climate change and supporting low carbon economy. Our partner Lend Lease's Elephant Park scheme is an urban regeneration project which is a part of the C40 programme and we support them in this initiative.

Talent

London is a vibrant and diverse city, and we are proud that so many people from around the world choose to make Southwark their home on arriving to the capital. We welcome the Mayors efforts to keep London open, following the decision of the majority of the UK electorate to leave the EU. Through our wide range of business networks, such as BIDs and the Southwark Business Forum, we will work with employers to prepare for changes to their workforce that may arise as we exit the EU, and as more imminent plans for the apprenticeship levy roll out.

The recent announcement that the Adult Education Budget will be devolved to City Hall is welcome news and we look forward to the working with the LEP to ensure the skills offer in Southwark and our surrounding boroughs is genuinely local, fit for purpose, and provides the pathway from school, college, university - into and through the work opportunities that our residents deserve.

We will also work with employers to ensure the opportunities available in London are made available to residents. Since 2014 our locally commissioned employment support services have helped over 3,000 unemployed residents back into employment, and our employment rate stands over 78% compared to the London average of 73%. The recent launch of the Southwark Construction Skills Centre will further grow the skills of London's workforce, with over 350 supported through the centre since opening.

Southwark Council is well aware of the key role that libraries play in digital training and upskilling of local community through internet access and IT training. Libraries also offer assistance for local people to find employment through, help with CV writing & job clubs to assist with job seeking. The broad range of services offered by libraries and the value they add to local communities is just one of the reasons why Southwark has kept all our libraries open in the face of unprecedented reductions in funding by central government. We urge the Mayor to consider the valuable role that libraries have in nurturing London's local talent and social infrastructure.

The role of business

We support the London Living Wage (LLW) for all businesses across London - Southwark was amongst the first boroughs to implement LLW and we actively encourage our partners to support the LLW via our procurement strategies, Diversity Standard, and employer engagement activities such as the Living Wage Symposium. Like the Mayor, we want to see the erosion of the gender pay gap, and through our Economic Wellbeing Strategy we will pursue a programme of work to further promote the London Living Wage and reduce the gender pay gap.

The proposed principle to drive up workplace standards is encouraged, though we would like to emphasise that this is broader than economic standards, and should extend to standards relevant to being good employers, fully engaged in supporting best practice including the London Healthy Workplace Charter. Southwark Council, the CCG, the local hospitals, the local universities and some of our major private sector employers have implemented the London Healthy Workplace Charter and we would like to see this approach taken up by all businesses.

Night time economy

A vibrant night time economy is identified as giving London a competitive edge. Southwark makes a significant contribution to this, however the night time economy is often located in areas which are facing considerable development pressure. Policies need to be developed to allow key operators to coexist in a mixed use environment consistent with the Central Activities Zone and Inner London.

Similarly, we need to promote a more even night time economy which includes theatres, cinemas, leisure, shopping and food opportunities. There is evidence that for some parts of London, a night time economy is dominated by alcohol licensed premises, fast food outlets and a very late night economy (between midnight – 5am). There has to be a balanced approach, taking into consideration existing and new housing, the needs of local communities versus the needs of town centre visitors. Growth in the night time economy needs appropriate resourcing in the form of late night transport, police and community safety, urgent health care provision, cleaning and regulatory service support.

Small and medium sized businesses

We agree that the spaces available to creative industries and SMEs need to be protected and encouraged, as these businesses, like those that support the night time economy, are under pressure from regeneration which can result in the loss of affordable workspaces. In line with our Council Plan commitment to invest in more affordable business space, Southwark Council would support the Mayor in identifying innovative funding mechanisms to help grow these sectors, within the context of new mixed use development which is taking place at Old Kent Road, Elephant & Castle and Canada Water.

4. Environment, Transport and Public Space

Road transport and buildings emissions

We fully support the proposal for cleaner outdoor air quality and the extension of the Ultra Low Emission Zone, we would welcome more details on how the extension will be phased in to allow businesses and residents to adapt. The proposed “toxicity charge” seems fair in principle, but we would like to understand how funds generated from the charge will be used, with the expectation that funds would be invested in sustainable transport options. We expect the GLA to consult fully with residents before moving forward with any plans.

We strongly welcome the introduction of greener and zero emission buses and would like a commitment from the Mayor to prioritise these for areas and roads which are the most polluted in London, such as the Old Kent Road, Walworth Road and Tower Bridge.

The proposal to lead by example through TfL is welcome and in addition to phasing out diesel buses, there is a strong case for TfL (as an extensive and influential organisation and with a widespread network of stations) to promote a healthier environment through, for example, adopting a code to promote healthier advertising.

Public space

We very much welcome the commitment to good and well designed public space and buildings. The physical environment needs to be attractive and support social integration; public space should also have smoke free options and support active design principles.

There is good evidence that social integration is supported by the creation and use of ‘shared space’ easily accessible by all communities. While business and security concerns need to be taken into account, we encourage owners of private outdoor spaces (such as roof gardens) to explore the many models through which these spaces can be enjoyed by all (a relatively high proportion of outdoor (non public parks) space in London is private).

There are also various successful approaches to designing indoor space, in particular in large residential developments and office buildings to create more shared accessible public space (such as atriums and indoor green space) and these successful approaches should be promoted.

We support the ambition to deliver a diversity of public space; however given the limited availability of space in the city, we feel that new public spaces should be of a high enough quality withstand the extra demands placed on them.

5. A City for all Londoners

Active citizenship

We fully support the promotion of active citizenship – Southwark has a strong commitment to volunteering and we would welcome working with you to promote successful approaches. Our recently adopted Voluntary and Community Sector Strategy outlines a collective approach to the way the Southwark Council, the CCG and the VCS community will work together to reduce and prevent future demand on high cost, high demand services, and sustain and build strong, cohesive communities, where no one group or community is left behind.

Healthy London

We especially welcome the recognition that lifestyle, in addition to NHS provision will need to be addressed to make London healthier. We would like to reiterate that a 'healthier street' is one which supports people to make healthier decisions – where the healthier choice is the easier choice. A healthy high street will promote active travel, healthier eating and sensible drinking. Smoking is still the major cause of ill health and mortality, a healthier street should be one where illicit tobacco is actively tackled and smoking discouraged.

There is a strong case to create environments that are less conducive to health problems such as obesity, which includes looking at the unhealthier food offer on our high streets. Achieving this will require both a promotion approach (e.g. promoting Sugar Smart or healthier catering) and regulation (e.g. A5 use class restrictions). While there must be a good mix of provision on all high streets and town centres, in some parts of London, premises with alcohol licenses dominate with related problems such anti-social behaviour and ambulance call outs. To tackle this 'unhealthier' physical environment, both promotion (e.g. best practice and harm reduction schemes) as well as regulation (licensing and planning) will have an important role.

We welcome a London approach to tackling health inequalities and we fully endorse the importance of tackling the wider social inequalities such as living conditions. However, as already highlighted, supporting people to make healthier choices and creating a healthy physical environment, must be an essential aspect of the London approach; there is a strong health inequalities dimension to obesity and tobacco use and this must be reflected in the London Health Inequalities Strategy.

Similarly, there is little to no mention in the document about sports and physical activity and the multiple benefits that can be gained from high quality facilities and opportunities to engage in physical inactivity. We consider parks and leisure facilities to be absolutely essential to tackling health inequality, and have been running an extremely successful "Free Swim & Gym" offer to residents and council employees since 2015. The benefits of leisure facilities to individuals and communities are immense, and can help to tackle long term, life limiting health problems.

Mental health

We welcome the Mayor's proposals around mental health; however we would like to see more information about how the changes are to be delivered against the background of existing national and local policy. We agree that early intervention is vital, but would also highlight the importance of prevention. There is scope to improve preventative work through a range of initiatives, including (but not limited to):

- More preventative work and discussions in schools and communities (faith groups, clubs, social activities).
- More and better social prescribing.
- Connecting people and communities via peer support/group peer support.
- Peer support.
- We also believe more needs to be done from a holistic perspective to address both mental and physical health. Local Care Networks have an important role to play in this.

Transport for all Londoners

Overall the intentions are to be sound. Any improvements that support the ability of people with disabilities to remain independent – and subsequently prevent the development of care needs are welcomed. Also the improvement of transport systems may lead to people with disabilities accessing services that they had previously been unable to access due to the multiple barriers when trying to navigate London (several of which the Mayor has made clear he intends to address).

As the first council in London to achieve World Health Organisation accredited Age Friendly status, we are fully aware of the importance of making services accessible to residents of all ages and abilities. Southwark's Highways Team are also developing a Vulnerable Persons Panel to ensure the needs and views of vulnerable residents shape our road networks, and we encourage the GLA and LAs to share good practice in this area.

However, a number of points regarding the accessibility of existing transport facilities should be noted:

- Dial-a-Ride is generally run well, but there are frequent issues regarding a lack of availability which impacts hugely on people with disabilities. The system used does not help them get most efficiencies (e.g. where rounds could be merged if flexible opportunities were identified). People often find that they can only get a booking in advance if they give an exact time. But in doing so, the system limits the flexibility to match people and routes; this leads to more inefficiencies and therefore less available bookings again, therefore perpetuating the problem.
- TfL buses are still very difficult to access in a wheelchair/scooter. New designs have not been an improvement and many people in wheelchairs simply cannot get on buses (or can only get on certain models/routes).
- Attitudes and bad experiences are also major barrier for people. Many disabled people still report bad experiences and poor driver/staff and poor public awareness. Many disabilities are also “invisible” and more awareness training is essential. We are glad to see this is highlighted in the paper.
- Some forms of public transport place wheelchair users at high risk of injury in the event of an accident, and we would like to see more safety measure introduced for those in wheelchairs and mobility scooters.
- We welcome innovations in technology to support sensory impairment, and every step free change is positive, but support from members of staff should also be made available.
- “Step free” access rarely means level access for wheelchair users - and gaps / small thresholds are as much a barrier as physical obstacles.
- Additionally, cycle routes crossing behind bus stops have been raised as safety concerns for people with mobility/cognitive and sensory impairments. There is evidence of new routes like Elephant and Castle being very difficult to negotiate now as a result of these new road layouts.

Participation in culture

We understand that for equality to be achieved culture must be something that everyone can access. In Southwark we are ensuring existing and new communities are catered for within the cultural landscape and that culture is accessible to all through our programming, commissioning and partnerships. The Theatre Peckham and Art Assassins led by the South London Gallery are just a few examples of how local young people are engaging and leading the arts, and we encourage the Mayor to build on the range of good practice already present in London.

Libraries also play a vital role in offering literature, poetry & music events and festivals to provide enjoyment, well-being and cultural development. As well as promoting books, literature and events for under-represented groups including the Black History Month programme and resources for LGBT communities. All in all, libraries are a crucial way of engaging people from all walks of life; providing them with a neutral space to explore culture, relax and learn.

Summary

We broadly welcome and look forward to onward dialogue and engagement with the Mayor and his officers. We are keen to contribute and play our part in the delivery of the strategies associated with the “City for All Londoners” consultation, especially where those plans help achieve our Council Plan ambition of a fairer future for all Southwark residents.