

Draft TEMPLATE FOR OBJECTIONS TO NSP SUBMISSION VERSION

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I wish to take part at the oral examination/public hearings.

New Southwark Plan Policy P1 AFFORDABLE HOMES

This policy is unsound because 35% affordable housing does not meet housing need in Southwark. The Council say the need is 48%, but then say 92% of households in Southwark have an income which requires some form of affordable housing. This is because the threshold to qualify for affordable housing is set at a household income of £90,000 which renders need and affordability meaningless.

The policy is not 35% of all new housing but 35% of developments of 11 or more homes. The policy fails to provide information on what % of total new build will be affordable, but the small sites allocation of 800 homes per year (see draft London Plan 2017) suggests the real policy figure will be under 30%. The policy requirement of 25% social rented is subject to the same caveat as above, well under the stated need for 33% of all new housing as social rented.

Confusion in the Reasons and Fact Box cast doubt on whether the Council intend to deliver 25% social rented homes. Social rent is relabelled as social housing, which in turn is sub-divided into affordable rent and London affordable rent (both at much higher rent levels) as well as social rent. This illuminates why the Council has consistently failed to achieve policy compliance on social rented housing.

The transparency and deliverability of the policy is further undermined by too much emphasis (points 7 and 8) on developments achieving policy compliance even if they do not provide affordable housing on site. This policy creates no go areas for social rented housing, widening spatial inequality in the Borough and inconsistent with Strategic Policy 2 Social Regeneration..

The prominence given to viability is not qualified with the policy approach required by the Mayor of London, such as full public disclosure of all viability assessments (not only viability reviews) and access to expertise independent of the developer.

To make the plan sound, the following changes are needed:

- Higher policy requirement for affordable housing in general and social rented housing in particular
 - The supporting text and Fact Box to be consistent with the social rented requirement to give confidence that the policy is deliverable.
 - Changes on small sites and viability to bring conformity with the draft London Plan
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New Southwark Plan Policy P2 NEW FAMILY HOMES

This policy is unsound as it defines family housing as including 2 bed homes, lacking conformity with the London Plan which says family housing generally has 3,4,5 or more bedrooms.

The policy is not positively prepared as it only requires family homes in major developments, a term which is not explained, and the variations in family housing for central, urban and suburban zones gives policy support for widening spatial inequality. Fewer 3 bed + homes in the central zone and area action plans also means fewer social rented homes in these parts of the Borough.

The policy does not address the evidenced need for 96% of social rented homes to be 3 bed +.

To make the policy sound, table 2 should be deleted and replaced with a policy requirement that the aim is for family housing to be delivered in equal measure across the Borough. The target for 3 bed + homes should be tenure specific so as to meet need.

NSP Policy P3 PROTECTION OF EXISTING HOMES

The policy is unsound because it does not consider the key planning objectives of a) retaining the existing stock of affordable/ social rented housing and b) bringing vacant properties into use, where possible as social rented housing. **It is therefore inconsistent** with current London Plan Policy 3.14 and draft London Plan 2017 Policy H10.

Within the plan, there is inconsistency between this policy and SP2 which emphasises giving every community the opportunity to get their voices heard. There is huge disquiet across the Borough with the policy of estate demolitions, but these voices are not being heard or responded to.

To make the policy sound, Southwark needs to make use of all the tools that are available to protect and increase social rented housing across the Borough. These should include:

- Independent analysis of all estate regeneration options, including refurbishment, with a ***binding ballot*** of tenants and leaseholders to decide what regeneration programme goes forward,
 - A ***social impact assessment*** so that social, health and wellbeing indicators are incorporated into decision making around regeneration schemes,
 - Any ***replacement of social rented housing*** should be carried out on the basis of like for like in terms of tenure, rental cost and size.
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New Southwark Plan Policy P4 PRIVATE RENTED HOMES

It is unsound to apply the 35% affordable housing requirement differently to private rented homes. In Policy P4, affordable housing only applies to schemes providing more than 100 homes and there is the option to provide only 12% of homes at social rent equivalent and 23% as intermediate homes (reversing the proportion in Policy P1). Consideration of actual planning applications shows that social rent equivalent schemes can be £160, £175 and £190 for 1,2 and 3 bed homes respectively compared with target social rents of £97, £111, and £ 124. Social rent equivalents would also only have 3 year tenancies.

The introduction in Policy P4 of a new rent product called discount market rent further confuses and dilutes the need for genuine social rent homes. No evidence is presented about how large scale private rented sector developments meet housing needs when their offer is inferior to conventional housing schemes.

To make this policy sound, the affordable housing offer provided by private rented schemes must be the same as required under Policy P1. The entire Policy P4 must apply to all new private rented housing so that improvements in conditions for private renters, such as longer term tenancies, benefit everyone.

NSP Policy P5 HOUSING FOR OLDER PEOPLE

The policy is unsound. It lacks specific requirements by which the policy can be delivered. All of the following need to be precisely described or measured:

“excellent accessibility and amenity”

“adequate communal areas”

“space for on-site services and facilities”

“good access to local goods and services”

“suitability of location”

The plan fails to plan positively because it does not identify sites where specialist accommodation can be provided. The evidence base does not include monitoring and evaluation of specialist provision over the last 5 years, compared with the target for Southwark in the current London Plan. The policy is inconsistent with the declaration by Southwark of an ‘Age Friendly Borough’.

The policy can be made sound by inserting specific requirements

- to reduce the social isolation of older people,
- to move safely and easily around their home and neighbourhood, including how adaptations will be delivered,
- for communal facilities such as lounge, laundry room and space for classes,
- for a social impact assessment before any loss of specialist housing for older people will be considered

(see current London Plan Policy 7.1 Lifetime Neighbourhoods and Draft London Plan 2017 Policy H15 Specialist Older Persons Housing).

New Southwark Plan Policy P6 - Homes for households with specialist needs

This policy is unsound on accessibility issues because all other new build housing must meet requirement M4(2) for accessible and adaptable dwellings. The policy cannot limit itself to 10% of homes dedicated to wheelchair users. Older people must have the choice of remaining in their own homes as their needs change in the future, rather than moving due to inaccessible accommodation.

To ensure wheelchair users have choice within a development, the requirement for wheelchair user dwellings must apply to all tenures and the wheelchair user dwellings distributed to provide a range of floor level locations, views and unit sizes.

We support at least 10% of housing meeting M4(3) and the design and access standards in table 5. However, to be sound the wording in the policy must make clear that step free access in the dwelling (lifts) will be provided.

The policy is also unsound in not including other households with specialist needs. In particular, it fails to either protect existing Gypsy and Traveller sites or plan to meet the need for more Gypsy and Traveller pitches. The Local Authority has failed to carry out a Gypsy and Traveller needs assessment, when this should have been an evidence base document for the Local Plan. The claim from the Local Authority that Gypsy and Traveller needs do not have a place in the Local Plan, because they can be dealt with in a separate document, is discriminatory.

To make the Local Plan sound, it must actively protect existing Gypsy and Traveller sites. It must adopt the new definition for Gypsies and Travellers in the draft London Plan 2017, and use as a Borough target for pitches the midpoint figure of need in Table 3 of the GLA Gypsy and Traveller Accommodation Topic Paper 2017.

New Southwark Plan Policy P8 - Supported housing and hostels

This policy is unsound because it only refers to hostels, sets out criteria 2.1-2.3 that are discriminatory (instead of bringing agencies and residents together) and fails to provide evidence on supported housing needs in Southwark.

To make this policy sound, it needs to include move on accommodation and accommodation for young people, rough sleepers, victims of domestic abuse, people with mental health issues, those discharged from hospital with support needs, those leaving prison.

The policy should commit to undertake assessments of the short term and long term needs for supported housing, auditing existing provision, identifying shortages in capacity and then planning to meet this need.

New Southwark Plan Policy P9 - Optimising delivery of new homes

The policy is unsound as it fails to balance the delivery of new housing with local character, social infrastructure and green infrastructure. Table 6 and Figure 2 over-develop North Southwark whilst protecting South Southwark thereby increasing the spatial inequality in the Borough

To make the Plan sound, the policy must include details from Lifetime Neighbourhoods Policy 7.1 of the current London Plan. This ensures that new developments build on rather than eradicate the existing qualities and diversity of Southwark's neighbourhoods. It develops inclusive and sustainable communities in which local employment, social and community facilities, parks and open spaces, local services and a wide range of homes are affordable and accessible to everyone. These criteria should be applied equally to residential neighbourhoods in the North and South of the Borough.

New Southwark Plan Policy - P10 Self and Custom Build

This policy is unsound because it places restrictions on self build and custom build which undermine the potential of this policy to empower local communities. The barriers of providing evidence of financial resources and making efficient use of land and appropriate density (all undefined and unevidenced) should be deleted. Neither criteria are included in the London Plan.

To be sound the principles in SP2 Social Regeneration require a package of support being identified that will empower communities and make this community form of housing deliverable. This could include working with the Mayor to provide access to expertise, partnering with smaller housing associations, the Local Authority arranging the appropriate checks on land and ensuring the register is fully accessible to community builders, neighbourhood forums and other community interests.

In accordance with the draft London Plan 2017 Policy H2 Small sites, the definition should be widened to include all community forms of housing (housing co-ops, co-housing, Community Land Trusts).