

## Addendum for housing policies in the publication/submission version of the core strategy

### Report recommendations

That the Executive:

1. Agrees the housing section of the core strategy publication/submission version (appendix A) to send to the council assembly for agreement for consultation
2. Agrees the proposed 'housing saved policies' for the Southwark plan as set out in Appendix B to send to Council Assembly for final agreement.

### Report - paragraph 24

There is a typo referring to appendix F. This should be appendix B.

### Appendix A – the core strategy

Comment by	Section	Comment	Proposed change	Change made yes/no
Officers	All	Changes to grammar and spelling	These have been made throughout – a tracked change version is available	
GOL	<b>Policy 5 Providing new homes</b>  We are doing this because	In the justification to this policy you say that you will take account of the revised housing figures from the SHLAA. If you know what these figures are I would suggest that you should make reference to this within the justification to this policy, with the caveat that this is part of the London Plan review that has not been subject to examination. You also state that, with windfall sites, you hope to deliver the proposed 24,450 new	The London Plan 2008 sets us a target of 16,300 net new homes between 2007/08 and 2016/17. We have rolled this target forward to 2026 to cover the 15 years timeframe of the Core Strategy to give ourselves a target of 24,450 net new homes between 2011 and 2026. <u>The consultation draft replacement London Plan 2009 target of 2005 units per year was released on 12<sup>th</sup> October 2009. We will work with GLA officers to reach a</u>	

		<p>homes from 2011 to 2026. Is this in line with the proposed housing targets coming out of the SHLAA? Also, PPS3 (paragraph 59) states that allowances for windfalls should not be included in the first 10 years of land supply unless LPAs can provide robust evidence of genuine local circumstances that prevent specific sites being identified. In these circumstances an allowance should be included but should be realistic having regard to the SHLAA, historic windfall delivery rates and expected future trends.</p> <p>Suggest that you include a reference to your proposed Housing DPD within the policy justification as I understand that this is where you propose to allocate housing sites.</p>	<p><u>common view on the most appropriate target.</u></p> <p>This is the 5th highest housing target in London. In addition to these sites we expect some <del>windfall</del> <u>smaller</u> sites to come forward to help us deliver 24,450 net new homes.</p>	
GOL	<p><b>Policy 5 Providing new homes</b></p> <p>Delivery and Implementatio n</p>	<p>Policy 5 on housing indicates that the SHLAA identifies available land and that sites will be designated on the proposals map. Despite this, it is not immediately clear from the policy itself where the bulk of housing will be delivered.</p>	<p>We have made changes to the implementation section to provide further detail and clarity to provide information required as set out below.</p> <p><b>Meeting London Plan targets</b> Under “How will it be achieved and the Infrastructure needed” column the following text has been added: <u>We need to build as many new homes as possible whilst protecting open space and making sure that places include employment, shopping, leisure and community activities.</u></p>	

			<p><u>Our strategy is to set out how many housing units will be for housing development with the amount of housing that can be built and when this may come forward.</u></p> <p>Under “Phasing” column the following text has been added: <u>Phases are:</u> <u>2009 – 2011</u> <u>2011 – 2016</u> <u>2016 – 2021</u> <u>2021 – 2026</u> <u>2026 – 2031</u></p> <p><u>We use our current targets until 2011. we set targets in the Core Strategy from 2011 – 2021. We predict growth based on a windfall analysis from 2021 – 2031.</u></p> <p>Under “Who Will Be Involved” column the following text has been added: <u>Local Communities</u></p> <p>Under “Funding” column the following text has been added: <u>Action areas will have funding set out in AAPs.</u> <u>We have a programme for unlocking funding for developments</u></p> <p><b>New development within the density ranges set out in the Core Strategy</b></p>	
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			<p>Under “How will it be achieved and the Infrastructure needed” column the following text has been added: <u>AAPs allocating sites for housing in our development management &amp; housing DPDs and by setting out more detailed guidance on housing sites in area SPDs</u></p> <p>Under “Phasing” column the following text has been added: <u>The adoption timetable is set out in our Local Development scheme</u></p> <p>We have added in a new target: <b><u>Improvements to policy and decision making.</u></b></p> <p>Under “How will it be achieved and the Infrastructure needed” column the following text has been added: <u>Developments are monitored every year in the annual monitoring report so that we can review the impact of the set of guidance and decisions. We use this information to change our policies and decision making where needed.</u></p> <p>Under “Phasing” column the following text has been added: <u>Annually</u></p>	
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			<p>Under "Who Will Be Involved" column the following text has been added: <u>Southwark Council</u></p> <p>Under "Funding" column the following text has been added: <u>Southwark Council</u></p>	
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Comment by	Section	Comment	Proposed change	Change made yes/no
GoL	<b>Policy 6 Homes for people on different incomes</b>	This states that development will provide 8558 affordable homes between 2011 and 2026; the justification goes on to say that 35% of all developments of 10 or more units need to be affordable. To add more weight to this policy you may want to include the overall percentage requirement of affordable housing within it. Your justification states that the proposed minimum of 35% affordable housing will help you meet some of the identified need for such housing within the borough. You are aware that London Plan Policy 3A.9 says that <i>“In setting targets boroughs should take account of regional and local assessments of need, the Mayor’s strategic target for affordable housing provision that 50 percent of provision should be affordable and, within that, the Londonwide objective of 70 percent social housing and 30 percent intermediate provision”</i> . You will need to provide a robust evidence base to justify why you are taking this policy forward i.e. that is the most realistic and achievable policy for your borough – particularly as you say that the borough need is higher than what is set out in this policy.	Developments of 10 or more units must provide a mix of types of housing as set out in figure 2. <u>These are:</u> <u>A minimum of 35% affordable housing borough-wide.</u> <u>A minimum of 35% private housing in the Elephant and Castle opportunity area and South Bermondsey, Faraday, Livesey, Peckham, The Lane, Brunswick Park and Camberwell Green wards.</u> <u>The mix for the area actions may be set out in their action plans.</u>	
Officer	<b>Policy 6 Homes for people on</b>	Further clarity of the minimum affordable housing policy should be provided.	We require development of 10 or more units to provide a minimum of 35% of the development as affordable housing. <u>The same 35%</u>	

	<b>different incomes</b>		<u>minimum affordable housing policy will apply to both new and replacement housing. We will set out our required split between social rented and intermediate housing in our housing development plan document. This is to provide increased housing choice, a wide range of housing types and to unlock the development of sites which would not otherwise be viable.</u>	
GoL	<b>Policy 6 Homes for people on different incomes</b>	The reference within this policy to proposed social/intermediate split has been removed. PPS3 says that in local development documents local planning authorities should <i>“Set separate targets for social-rented and intermediate affordable housing where appropriate. A sufficient supply of intermediate affordable housing can help address the needs of key workers and those seeking to gain a first step on the housing ladder, reduce the call on social-rented housing, free up existing social-rented homes, provide wider choice for households and ensure that sites have a mix of tenures.”</i> This is also contrary to London Plan Policy 3A.9.	<u>We will set out our required split between social rented and intermediate housing in our housing development plan document. The policy 4.4 Affordable Housing with this split is being saved in the Southwark Plan.</u>	
GOL	<b>Policy 6 Homes for people on different incomes</b>	The policy needs to include a requirement for the maximum reasonable proportion of affordable housing.	Development should provide as much affordable housing as <u>is reasonably possible</u> whilst also meeting the needs for other types of development and encouraging mixed communities.	
GOL	<b>Policy 6 Homes for people on different incomes</b>	It is not immediately clear from the policy itself how this will be delivered.	We have made changes to the implementation section to provide further detail and clarity to provide information required as set out below.	

	<p><b>incomes</b></p> <p>Delivery and Implementat ion</p>		<p><b>Meet the affordable housing target of 8558 homes</b>  <b>Meeting the mix of housing required in different areas of the borough.</b></p> <p>Under “How will it be achieved and the Infrastructure needed” column the following text has been added:  <u>We need to build as many affordable homes as possible. Our strategy is to require 35% affordable homes everywhere. We also require 35% private homes in areas where most development is 100% affordable to increase housing choice and create a mix of housing.</u></p> <p>Under “Phasing” column the following text has been added:  Phases are  <u>2009 – 2011</u>  <u>2011 – 2026</u>  <u>2016 – 2021</u>  <u>2021 – 2026</u>  <u>2026 – 2031</u>  <u>We use our current targets. We set targets in the core strategy from 2011 to 2026.</u></p> <p><u>We predicted growth based on a windfall analysis from 2021 to 2031.</u></p> <p>Under “Who Will Be Involved” column the following text has been added:  <u>Local Communities</u></p>	
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			<p>We have added in a new target: <u>Improvements to policy and decision making.</u></p> <p>Under “How will it be achieved and the Infrastructure needed” column the following text has been added: <u>Developments are monitored every year in the annual monitoring report so that we can review the impact of the set of guidance and decisions. We use this information to change our policies and decision making where needed.</u></p> <p>Under “Phasing” column the following text has been added: <u>Annually</u></p> <p>Under “Who Will Be Involved” column the following text has been added: <u>Southwark Council</u></p> <p>Under “Funding” column the following text has been added: <u>Southwark Council</u></p>	
Planning Committee	<p><b>Policy 7 Family housing</b></p> <p>General comment</p>	<p>Would support the principle of different levels of family housing based on density. Therefore there could be areas with lower density and lower family housing and vice versa due to provision of amenity space.</p>	<p>Please see Executive member change below</p>	

<p>Executive member</p>	<p><b>Policy 7 Family housing</b></p> <p>We will do this by</p> <p>Also this leads to changes on page 94 and 120 of the housing strategy.</p>	<p>Change the policy to have a variation in requirements for family housing based on the density of areas as set out in the map below.</p>	<p><b>Policy 7 – Family homes</b></p> <p>Development will provide more family housing with 3 or more bedrooms for people of all incomes to help make Southwark a borough which is affordable for families. New homes will have enough space for the needs of occupants.</p> <p><b>We will do this by:</b></p> <p>Developments of 10 or more units must have:</p> <p>At least 60% 2 or more bedrooms</p> <p><u>3, 4 or 5 bedrooms as set out in figure 3. This requires:</u></p> <p><u>At least 10% 3,4 or 5 bedrooms in Potters Field, London Bridge and the north of Blackfriars road.</u></p> <p><u>At least 20% 3, 4 or 5 bedrooms in the urban zone and the central activities zone except where set out above.</u></p> <p><u>At least 30% 3, 4 or 5 bedrooms in the suburban zone.</u></p> <p><del>At least 30% 3, 4 or 5 bedrooms.</del></p> <p>This <del>must</del> <u>may</u> be split between private, social and intermediate housing</p> <p><del>Within the Elephant and Castle Opportunity Area at least 10% must have 3, 4 or 5 bedrooms</del></p> <p>A maximum of 5% as studios and only for private housing.</p> <p>NB Canada Water action area plan 'action area core' will be inserted into the core strategy submission version once the Canada Water action area publication/submission version has</p>	
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			been adopted for consultation.	
Executive member	<p><b>Policy 7 Family housing</b></p> <p>We are doing this because</p>	Reflect the policy change above to family housing in the explanation for the policy.	<p><u>The level of family housing that we require is based on the density of development and the ability of development to provide amenity space for families. We require 30% in the suburban zone because these areas are less dense and are more suitable for families.. We will also require 30% in the Aylesbury to create a new area that is attractive for families and to meet the re-housing needs of existing tenants We require 20% in the urban zone and the areas with a lower density in the central activities zone. We require 10% in areas where we would allow tall buildings. We may vary the level of family housing further through our area actions plans for Canada Water and Peckham and Nunhead.</u></p> <p><u>The policies put forward through the AAPs for family housing will take precedence over the family housing policy in the Core Strategy. Canada Water Area Action Plan is currently at preferred options consultation. Depending on the responses we receive on the AAP, we will set out a level of family housing. Similarly for Peckham and Nunhead, we will consider whether we should vary the level of family housing through the preferred options consultation in 2010.</u></p> <p><u>There are two areas where we have varied the mix of homes. Together these areas will offer a</u></p>	

			<p>genuine choice of housing across the area of Aylesbury and Elephant and Castle. In the Aylesbury action area core, we will achieve slightly higher levels of homes with two or more bedrooms (70%), in order to ensure we can meet the re-housing needs of existing tenants and to ensure the new neighbourhood is attractive to families. This is explained in more detail in the Aylesbury Area Action Plan. Within Elephant and Castle Opportunity Area we require a lower amount of family housing because of the vision for the area as a central London destination with 400,000sqm of new development. As there will be so much new shopping, leisure and business space to transform the area, new homes will normally be above ground floor. This minimises the potential to provide enough outdoor amenity space for family housing. It is very important that all housing development provides open space so that residents have outdoor space in which to play and relax. Family housing must provide a minimum of 10sqm of private amenity space to ensure that children have somewhere safe to play. This requirement is set out in our Residential Design Standards supplementary planning document. New housing developments must also provide communal play areas for children, as required by the Mayor's Supplementary Planning Guidance on Providing for Children and Young People's Play and Informal Recreation. The type of</p>	
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			<p>developments in denser areas proposed through the Elephant and Castle masterplan does not provide enough space to meet these requirements and is more suitable for higher levels of one and two bedroom homes to help transform the area.</p>	
GOL	<p><b>Policy 7 Family homes</b></p> <p>Delivery and Implementation</p>	<p>It is not immediately clear from the policy itself how this will be delivered.</p>	<p>We have made changes to the implementation section to provide further detail and clarity to provide information required as set out below.</p> <p>We have added the following targets:</p> <p><b><u>Suburban Zone and Aylesbury Action Area Core: 30% as 3, 4 or 5 bedrooms</u></b></p> <p><b><u>Urban Zone and most of CAZ: 20% as 3, 4, or 5 Bedrooms</u></b></p> <p><b><u>The four 10% family housing areas (shown in blue on the map): 10% as 3,4 or 5 bedrooms</u></b></p> <p><b><u>Canada Water and Peckham and Nunhead AAP's as set out in the AAP's</u></b></p> <p>Under "How will it be achieved and the Infrastructure needed" column the following text has been added:</p> <p><u>We need to build as many affordable homes as possible. Our strategy is to require 35% affordable homes everywhere. We also require 35% private homes in areas where most development is 100% affordable to increase</u></p>	

			<p><u>housing choice and create a mix of housing.</u></p> <p><u>Through the SHLAA we have demonstrated that we can provide 4023 new family homes through the policy.</u></p> <p><u>Through requiring more family housing in less dense areas.</u></p> <p>Under “Phasing” column the following text has been added: Phases are <u>2009 – 2011</u> <u>2011 – 2026</u> <u>2016 – 2021</u> <u>2021 – 2026</u> <u>2026 – 2031</u> <u>We use our current targets. We set targets in the core strategy from 2011 to 2026.</u> <u>We predicted growth based on a windfall analysis from 2021 to 2031.</u></p> <p>Under “Who Will Be Involved” column the following text has been added: <u>Local Communities</u></p> <p>We have added in a new target: <b><u>Improvements to policy and decision making.</u></b></p> <p>Under “How will it be achieved and the Infrastructure needed” column the following text has been added:</p>	
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			<p><u>Developments are monitored every year in the annual monitoring report so that we can review the impact of the set of guidance and decisions. We use this information to change our policies and decision making where needed.</u></p> <p>Under “Phasing” column the following text has been added: <u>Annually</u></p> <p>Under “Who Will Be Involved” column the following text has been added: <u>Southwark Council</u></p> <p>Under “Funding” column the following text has been added: <u>Southwark Council</u></p>	
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Planni ng Com mittee	<b>Policy 8 Student housing</b>  We will do this by, bullets 2 and 3	Reword to provide clarity that the affordable housing is for general needs rather than for students.	<b>We will do this by:</b> <u>Requiring 35% of <del>purpose built</del> student developments as affordable housing in line with policy 6 and figure 2.</u> <del>Requiring a section 106 agreement for purpose built student housing.</del>	
Planni ng Com mittee	<b>Policy 8 Student housing</b>  We will do this by, bullets 1 and 2	Provide clarity that this is not just purpose built student accommodation as many of the developments are conversions and change of use.	<b>We will do this by:</b> Allowing development of <del>purpose built</del> student homes within the town centres, <u>Requiring 35% of <del>purpose built</del> student developments as affordable housing in line with policy 6 and figure 2.</u>	
Planni ng Com mittee	<b>Policy 8 Student housing</b>  We are doing this because	Provide clarity that this is not just purpose built student accommodation as many of the developments are conversions and change of use.	We will do this because:  We already have the second largest number of <del>purpose built</del> student homes in London. Increasingly we are receiving more and more planning applications and pre-application inquiries about new large scale <del>purpose built</del> student homes.	
GOL	<b>Policy 8 Student housing</b>  Delivery and Implementatio n	It is not immediately clear from the policy itself how this will be delivered.	We have made changes to the implementation section to provide further detail and clarity to provide information required as set out below.  <b>Student housing located in town centres and areas with good public transport accessibility.</b>  Under “How will it be achieved and the Infrastructure needed” column the following text	



			<p>has been added: <u>Our strategy is to work with local colleges and universities to help them meet their needs. We will require affordable housing to ensure affordable and family housing are provided to meet our targets.</u></p> <p>Under “Phasing” column the following text has been added: Phases are <u>2009 – 2011</u> <u>2011 – 2026</u> <u>2016 – 2021</u> <u>2021 – 2026</u> <u>2026 – 2031</u> <u>We use our current targets. We set targets in the core strategy from 2011 to 2026.</u> <u>We predicted growth based on a windfall analysis from 2021 to 2031.</u></p> <p>Under “Who Will Be Involved” column the following text has been added: <u>Local Communities</u></p> <p>We have added in a new target: <b><u>35% affordable housing (including family housing) provided on all student sites of the equivalent of 10 or more housing units</u></b></p> <p>Under “How will it be achieved and the Infrastructure needed” column the following text has been added:</p>	
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			<p><u>We need to build as many affordable homes as possible. Our strategy is to require 35% affordable homes everywhere. We also require 35% private homes in areas where most development is 100% affordable to increase housing choice and create a mix of housing.</u></p> <p><u>We need to provide student housing to meet the needs of local colleges and universities. We need to provide student housing to meet the London need everywhere. It does not prevent us meeting our housing, affordable housing and family housing targets.</u></p> <p>We have added in a new target: <b><u>Improvements to policy and decision making.</u></b></p> <p>Under “How will it be achieved and the Infrastructure needed” column the following text has been added: <u>Developments are monitored every year in the annual monitoring report so that we can review the impact of the set of guidance and decisions. We use this information to change our policies and decision making where needed.</u></p> <p>Under “Phasing” column the following text has been added: <u>Annually</u></p>	
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GLA	<p><b>Policy 9 Homes for Gypsies and Travellers</b> We are doing this because</p>	We need to put in the London Plan target of 15 pitches in table 3.4	<p><u>We will manage the need for provision of new Gypsy and Traveller pitches in the housing development plan document.</u></p>	
GOL	<p><b>Policy 9 Homes for Gypsies and travellers</b>  Delivery and Implementatio n</p>	It is not immediately clear from the policy itself how this will be delivered.	<p>We have made changes to the implementation section to provide further detail and clarity to provide information required as set out below.</p> <p>We have added in a new target: <b><u>Improvements to policy and decision making.</u></b></p> <p>Under “How will it be achieved and the Infrastructure needed” column the following text has been added: <u>Developments are monitored every year in the annual monitoring report so that we can review the impact of the set of guidance and decisions. We use this information to change our policies and decision making where needed.</u></p> <p>Under “Phasing” column the following text has been added: <u>Annually</u></p> <p>Under “Who Will Be Involved” column the following text has been added:</p>	

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