

2 March 2018  
L 180302 - SAV Southwark LP Representations



Sadiq Khan (Mayor of London)  
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Dear Sir or Madam,

**DRAFT NEW LONDON PLAN CONSULTATION  
REPRESENTATIONS ON BEHALF OF AVIVA INVESTORS PENSIONS LTD & GALLIARD HOMES LTD**

**Introduction**

We write to provide representations to the Draft New London Plan on behalf of Aviva Investors Pensions Limited ('**Aviva**') and Galliard Homes Limited ('**Galliard**').

Aviva owns the Cantium Retail Park on the Old Kent Road. The site is situated within the Old Kent Road Opportunity Area which lies within the authority of the London Borough of Southwark ('**LBS**').

Cantium Retail Park forms part of a wider allocation within the emerging LBS Old Kent Road Area Action Plan ('**OKRAAP**') that establishes its suitability for redevelopment.

Aviva is subsequently preparing the redevelopment of this site with Galliard as a Joint Venture partner for a range of uses including, residential, retail, office and other commercial uses.

We are instructed to submit comments and requests for clarification in respect of the Draft New London Plan Consultation having regard to its deliverability and application.

**Representation on Specific Policies**

***Policy H6– Threshold approach to applications***

Aviva and Galliard support the delivery of affordable housing and specifically the expectation that all development proposals should maximise the delivery of genuinely affordable homes.

However, they wish to highlight some concerns regarding the Mayor's threshold approach to the Viability Tested Route. This includes a requirement to consider the circumstances which exist where redevelopment of existing operational assets such as retail parks and units is proposed.

In order to take account of such circumstances, we request that the supporting text to Policy H6 makes reference to the fact that the redevelopment of such sites may be constrained by the need to provide for the temporary or permanent relocation of a trading asset and the higher existing use value of the land. This will ensure that these challenges are taken into account when considering the provision of affordable housing when following the viability tested route.

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### ***Policy S6– Public toilets***

Policy S6 requires large-scale commercial developments that are open to the public to provide and secure the future management of free publically accessible toilets.

The supporting text to Policy S6 states that Boroughs should define 'large-scale' for their local circumstances.

Aviva and Galliard note that the definition of large scale needs to relate to the individual centre in which a development is proposed to take place but that this must also be subjects to commercial realism in respect of management and viability considerations.

For example, the proposal by London Borough of Southwark to adopt a threshold of 1,000 sq. m for where large schemes are required to provide public toilets, public drinking fountains and public seating is far too low. This quantum of floorspace could effectively comprise a single, standalone retail unit. Large scale commercial development requiring public facilities should be, as a minimum, multi-unit schemes that have a wide catchment or draw.

A full and detailed assessment of existing public facilities and private facilities available to the public (e.g. cafes etc) should also form part of the consideration as to whether new facilities are required.

### ***Policy E9 – Retail, markets and hot food takeaways***

Policy E9 Part E proposes that large scale commercial developments of 2,500 sq.m GIA or more of retail floorspace support the provision of small shops and other commercial units. This includes the provision of affordable units where there is evidence of local need.

The proposed threshold is too low and would be restrictive on the redevelopment of significant sites such as those located within the Old Kent Road Opportunity Area.

In addition, affordable units should be a requirement in multi-unit commercial schemes that exceed a much larger quantum of floorspace i.e. 5,000 sq. m. The proposed 2,500 sq. m threshold could be delivered as a single retail unit which would mean any requirement for affordable units would be overly onerous.

The policy should make it clear that any affordable commercial premises should form part of the overall viability assessment for a development proposal.

Aviva and Galliard also request clarity as to what uses are envisaged to be covered by the term 'commercial units'.

### ***Policy T5 – Cycling***

Aviva and Galliard support the principle of encouraging appropriate and adequate cycle provision as part of new large scale proposals for development.

However, it is noted that there is currently very little evidence presented within the draft London Plan for the proposed increase in the minimum cycle parking standards set out at Table 10.2. This evidence should necessarily be based on surveys of cycle parking usage at existing developments to support the proposed uplift in provision.

Aviva and Galliard do not consider that an increase in the demand for cycle ownership is to the extent which is currently suggested by the draft London Plan. Whilst a general increase in cycling trips within London is not disputed it is not clear as to what proportion of these are as a result of schemes like the Santander Cycle Hire (as opposed to people using their own private bike). Accordingly, we request that further consideration of this is undertaken as part of the evidence base in order to properly inform the policy.



With respect to flexible solutions, Aviva and Galliard welcome the acknowledgement that it is not always possible to provide the full amount of cycle parking onsite and that individuals boroughs should work with developers to provide alternative solutions.

In particular, there has been a recent emergence of Dockless Cycle Hire companies in London, which TfL acknowledges has *'potential to make cycling more accessible and attractive for Londoners'*. Accordingly, further consideration of this is required to help cater for the rise in cycle trips, particularly as it avoids the need to own, store or maintain a private bike, and given how integrated the hire process is via a mobile phone app. The evidence base is totally silent on the potential for Cycle Hire schemes to be successful and to relieve some of the pressure on development sites to provide vast areas of dedicated parking for private cycle ownership.

For high density large-scale apartment blocks, a different approach to cycle parking is needed, one that recognises that some people wish to own and use a bike, whilst others will want to simply hire one and not have the hassle of storing or maintaining one. At the moment, the cycle parking standards are weighted far too heavily in favour of private ownership.

### **Policy T6 – Car Parking**

The general lowering of parking standards is supported. The main concern for development proposals relates to the provision for residential disabled parking, and the difficulty in delivering an initial 3% provision, but being required to show how 10% provision could be accommodated in the future. This is an onerous and unrealistic requirement, particularly for large residential schemes where the difference between 3% and 10% provision is significant in terms of land-take. The policy needs to afford greater flexibility to proposals for major development which will deliver a significant quantum of housing.

The parking management details requested are also onerous and considered excessive. It would be better if individual boroughs set out their own disabled parking requirements according to local data (number of blue badge holders etc.) rather than imposing a blanket-wide provision that is not always needed or practical to provide.

### **Summary**

We trust that these comments are helpful, and would be happy to discuss any of the issues and queries raised in more detail.

In addition, we are also mindful that the NPPF is currently under review and reserve our position to modify these representations in light of any changes to the NPPF.

On behalf our client, we request that we are kept up to date on the progress of the Draft New London Plan which will include notifying us when it is submitted to the Secretary of State.

Yours faithfully

**Savills (UK) Limited**  
Commercial Planning

Encs.

cc. M Watson - Galliard Homes  
H Rainsford - Aviva Investors