



c/o *****

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Dear Sir/Madam

CANTIUM RETAIL PARK 520 OLD KENT ROAD, LONDON SE1 5B Ref 18/AP/3246

We wish to make the following comments on the above planning application in the light of the recently issued Development Management report.

The report states that the Applicant is offering delivers a policy compliant mix of affordable housing, including 70% social rented housing (para 171).

We welcome this, but are concerned that the offer does not appear to be supported by a viability assessment that would ensure delivery of the affordable housing. The report notes that the Applicant's viability assessment, by Savills, calculates a deficit (para 171, 172).

The council's consultants calculate a viable scheme can be delivered with a 12% GDV profit, but the Applicant does not accept this is a reasonable level of profit (para 175).

The report outlines why the council thinks the scheme can be policy compliant in any event, given increases in future market sales values, citing the extension of the Bakerloo Line as a key favourable factor (para 176,177), the affordable housing to be secured by a s106 agreement (para 166).

We nonetheless ask that the Applicant and the council confirm that they are in agreement that a fully policy compliant scheme will be delivered, with social rented housing at target rents (NB we note these are not referred to in the report).

Secondly, we note that the Applicant argues it is unviable to apply for grant funding for additional affordable housing, because it would preclude the opportunity to reduce the scheme's deficit, through increasing free-market values (by reducing the number of free-market units, if we understand correctly) (paras 178-182). There is no reference to viability assessment information supporting this, either from the Applicant or the council.

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We note that the GLA Stage One report states '*The applicant must explore opportunities*

to increase the level of affordable housing by accessing grant funding’.

While a fully policy compliant scheme is welcome, there is nonetheless the London Plan requirement that beyond that, the maximum reasonable amount of affordable housing is secured (Policy 3.12), reinforced by Southwark’s acute need for social rented housing, noted in the report (para 162). **We therefore ask that this point is brought to the attention of the planning committee for full consideration.**

Yours faithfully

Jerry Flynn
35% Campaign