



Re: Objection to planning application 17/AP/4508 (6-12 VERNEY ROAD, LONDON, SE16 3DH)

We object that this application should not be approved without an amendment to the officer's recommendation, namely, that there be a Late Stage Viability review, to maximise the amount of affordable housing, in accordance with draft New London Plan H6, Para E 2(b). and the Mayor's Affordable Housing and Viability SPG, which is a material consideration for planning applications in London.

Such a review is required by the GLA Stage 1 report for the application which *states '...late stage review mechanisms'* must be secured (pg1; paras 21, 22).

The Officer's Report addresses the issue of the required amount of affordable housing in para 97-101. It acknowledges that there may be a net loss of B1c space (ie light industry appropriate in a residential area) (101) and that such land should deliver *'at least 50% affordable housing where the scheme would result in a net loss of industrial capacity'*, under the draft London Plan (98). It correctly notes the draft LP threshold for viability assessments in this case as 50% affordable housing (99); however, it omits any reference to the Late Stage Viability Review this entails, under the draft NLP. Instead the Report advises a viability assessment *'as required by the Southwark's plan policies'* has been conducted and that this establishes 35% affordable housing as *the 'maximum that can be provided'* (101).

This cannot be known in the absence of a Late Stage Review.

The Report states that the Council's independent appraisal estimates that the technical level of viability falls far short of being able to provide 35% affordable housing, but that *'the applicant is taking a view that the proposed development will outperform present day market assumptions''* (248). How far the development will outperform present day assumptions therefore must be measured, regardless of how big the viability gap presently appears to be, if the maximum reasonable amount of housing is to be secured.

The Report refers to a *'localised performance affordable threshold'* as allowed by *'current guidance in the Mayor's Housing SPG'* (101), but correctly states that that this approach has been deleted from the draft NLP, so indicating the policy *'direction of travel'* is towards the 50% threshold. In any event, we cannot see any reference to a *'localised performance threshold'* in any of the local plan documents, other than to 40% affordable housing in the draft New Southwark Plan (P1, Viability 2), which this application does not meet.

Grant Funding

The Report makes no mention of the Applicant investigating the availability of grant funding to increase affordable housing, as required by the GLA Stage 1 report (para 22) and according to draft London Plan (Policy H5 A2).