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Dear Affordable Housing LPG Team

Southwark Council response to the draft Affordable Housing and Development Viability
London Plan Guidance (LPG)

Thank you for providing us with the opportunity to comment on the draft London Plan
Guidance on Affordable Housing and Development Viability. Southwark Council welcomes
the introduction of this important draft guidance and its objective to deliver more affordable
housing across London to address the housing crisis.

Threshold Approach

We support the further detailed guidance on how the Threshold Approach should be applied
in practice.

As you may be aware, the adopted Southwark Local Plan 2022 goes further than the
London Plan and requires a minimum of 40% affordable housing (60% in the Aylesbury
Action Area Core) with a policy compliant tenure mix, without grant subsidy, to qualify for the
Fast Track Route.

The Local Plan also states that any development that creates 9 homes or fewer (inclusive)
must provide the maximum amount of social rented and intermediate homes or a financial
contribution towards the delivery of new council social rented and intermediate homes with a
minimum of 35% subject to viability.

We also note that the draft guidance requires development which provides 75% affordable
housing would go through the Fast Track Route regardless of tenure, where this is
supported by the borough. As our adopted Local Plan sets out a clear tenure mix
requirement, we believe that this would enable the Council to secure a policy compliant
tenure mix on these schemes.

We are assured that the draft guidance would not impact on our current policy approach.

Tenure

We welcome the additional guidance on securing a wide range of tenures and that Social Rent is best placed to meet London's affordable housing need. The need for more housing specifically for key workers is also supported as this is an area that the Council is currently focussing on.

Grant Funding

The Council supports the wide range of funding available to deliver more affordable homes in London. Southwark has a pressing need for additional affordable homes and this funding makes a positive contribution to addressing the housing crisis in the borough. Any further funding and support would be greatly appreciated to create a step change in the delivery of new affordable homes.

Build to Rent

We welcome the encouragement to take a positive approach to build to rent in order to increase the delivery of new homes.

We note that the draft guidance states that in order to qualify for the Fast Track Route schemes should deliver 30% Discount Market Rent at levels equivalent to LLR and 70% Discount Market Rent at a range of genuinely affordable rents.

Our adopted Local Plan seeks a minimum of 35% affordable housing of which 15% must be made up of social rent and 20% at affordable rent capped at LLR equivalent. We understand that the draft guidance would not have any impact on our locally agreed approach.

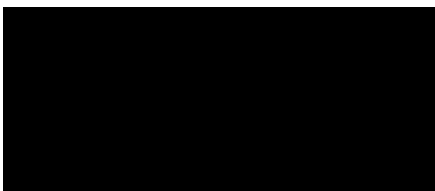
Securing Affordable Housing and Monitoring and Implementation

The additional guidance on how affordable housing should be secured, monitored and implemented is welcomed and should provide applicants with greater clarity on the information and evidence that is required during the planning application stage.

Development Viability LPG

We found the document clear and easy to understand, providing detailed information on how development viability appraisals should be conducted on a range of schemes and the evidence that is required. We welcome the introduction of this document and should provide applicants with greater clarity on the process involved.

Yours Sincerely,



Cllr Helen Dennis

Cabinet Member for New Homes and Sustainable Development