



**LONDON BOROUGH OF WANDSWORTH**  
**LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC**  
**WRITTEN STATEMENT**

**MAIN MATTER 2:**  
**SPATIAL DEVELOPMENT STRATEGY**  
**(including Appendices 1, 2 and 3)**  
**(POLICIES SDS1 AND PM1)**

**TUESDAY 15 NOVEMBER 2022**

**Abbreviations**

- AMR – Authority Monitoring Report
- CAZ – Central Activities Zone
- ELPS – Employment Land and Premises Study 2020
- HELAA – Housing and Economic Land Availability Assessment
- HMO – Homes in Multiple Occupation
- LBW – London Borough of Wandsworth
- LP – The London Plan
- NPPF – National Planning Policy Framework
- PTAL – Public Transport Accessibility Level
- SHLAA – Strategic Housing Land Availability Assessment
- SIL – Strategic Industrial Location
- VNEB OA – Vauxhall Nine Elms Battersea Opportunity Area
- WLP – Wandsworth Local Plan

***Is the Spatial Development Strategy 2023 - 2038 for the London Borough of Wandsworth justified by appropriate available evidence, having regard to national guidance, and local context, including the London Plan?***

Policy SDS1 sets out the strategic spatial policy for the borough, and defines the framework for the Local Plan, principally setting out the minimum housing target and the distribution of this target across the borough. In doing this, Policy SDS1 links directly to the Area Strategies, the Site Allocations, the small sites target and other forms of provision including self-build and for Gypsies and Travellers. Policy SDS1 also discusses employment needs and provisions (criterion E/F), support for town centres (criterion F), waste (criterion G) and infrastructure provision (criterion H).

The Local Plan defines the basis for the Spatial Strategy (paras 2.59 – 2.102), emerging from the Vision and Objectives and couched within the three strands of the Council's approach to plan-making: **Placemaking, Inclusive Growth** and **People First**.

The submitted Local Plan reflects national guidance and is – in the opinion of the Council – in 'general conformity' with the London Plan (see Written Statement MM1).

***National Planning Policy Framework***

At the outset of the Government's National Planning Policy Framework (NPPF), it states that the, '*purpose of the planning system is to contribute to the achievement of sustainable development*' (para. 7) and that at the heart of the Framework is a, '*presumption in favour of sustainable development*' (para 10). For plan-making, this means promoting a sustainable pattern of development that meets development needs (particularly the objectively assessed need for housing), aligns growth and infrastructure, improves the environment and mitigates / adapts to climate change.

The NPPF places a value upon the importance of existing centres, and recognises the importance that they play at the heart of communities. It maintains a sequential approach to main town centre uses that ensures that centres are not disadvantaged by such uses which exist away from them (Section 7). It promotes mixed-use communities where social interaction is promoted and places have good street layouts that are easily connected through pedestrian and cycle routes and provided with safe and accessible green space (Section 8). Into this is added the early consideration of transport routes and modes to ensure that sustainable means of movement can be employed and encouraged, and development is focused on locations which are or can be made sustainable (Section 9). In meeting the defined needs of a place – housing and employment in particular – best use

should be made of existing and available land, and its use should be optimised based on character and context assessments.

### **London Plan 2021**

The London Plan aims to be consistent with national policy. It is underpinned by the idea of ‘good growth’ and sets out six key policies (GG1 – GG6) that focus on building strong and inclusive communities, making the best use of land, delivering the homes that London needs and growing the economy whilst maintaining resilience and efficiency.

The London Plan has a spatial strategy that defines the way the Mayor sees the city developing in the plan period. This includes, at Policy SD1, the definition of major Opportunity Areas (OA)<sup>1</sup> and the reinforcement of the Central Activities Zone (CAZ) as an internationally, nationally and regionally important focus providing a concentration of jobs, homes and significant cultural, civic and leisure activities (Policy SD4). The CAZ comprises the City of London, most of Westminster and the inner parts of Camden, Islington, Hackney, Tower Hamlets, Southwark, Lambeth, Kensington & Chelsea and Wandsworth. The VNEB OA falls within the CAZ, which makes this designation spatially important for the borough. The London Plan identifies town centres and high streets outside of the CAZ as central to the lives of Londoners (para 2.6.1), and has a strong town centres first approach to make the most of these concentrations of activity and promote sustainable movement and transport (para 2.7.1).

Within the London Plan, Wandsworth Town, Clapham Junction, Tooting and Putney are defined as major town centres, with Balham and Earlsfield defined as district centres.

Beyond the setting of this spatial framework across London, the London Plan contains a series of policy expectations and targets for individual boroughs that are set out across the suite of policies. In respect of Policy SDS1, the most important of these is the ten-year housing completion target which, for Wandsworth, is set at 19,500 homes between 2019/20 and 2028/29, an annual figure of 1,950. This is expressed at London Plan Policy H1. Within this target is a smaller target for achieving completions on small sites (Policy H2) which, for Wandsworth, is set at 4,140 completions over the same period, an annual figure of 414. These figures are reflected in Policy SDS1.

The London Plan defines a strategic reservoir of industrial land through Policy E5 and, within Wandsworth, Queenstown Road and Summerstown are identified as Strategic Industrial Locations (SIL). These form part of London’s main reservoir of land for industrial, logistics

---

<sup>1</sup> Vauxhall / Nine Elms / Battersea and Clapham Junction are directly relevant for Wandsworth

and related uses and are given this status because they are considered critical to the effective functioning of London’s economy.

In addition, the London Plan contains within it other targets that the borough needs to consider within the plan, such as waste apportionment targets, and other strategic designations – such as open space and strategic transportation proposals – that need to be translated into a local plan.

**Wandsworth Local Plan, Policy SDS1**

Policy SDS1 has been developed to address the long-term needs of the borough and respond to the challenges it faces. It maximises the opportunities that exist for providing new homes, jobs, and the facilities, services and infrastructure needed to ensure that the Council’s Placemaking, Inclusive Growth and People First ambitions are met.

**Criterion A** of the Policy sets out the housing target for the borough as defined in the London Plan, including the small sites allowance.

The target for the period of the Local Plan (2023/24 – 2037/38) is 20,311 dwellings, which is made up of the 1,950 annual requirement of the London Plan to 2028/29 and an annualised target which comes from the London Plan Strategic Housing Land Availability Assessment (SHLAA) 2017, plus small sites target which was agreed as the Local Plan approach in accordance with para 4.1.11 of the London Plan<sup>2</sup>.

**Table 1** below sets out the cumulative target for each five-year period of the plan and how it is made up, alongside the capacity available in each period derived from the HELAA (discussed under criterion B, below).

---

<sup>2</sup> Para 4.1.11 states, “If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites”.

Table 1

Years of Local Plan	Cumulative Target and make up	Capacity
5 Year Years 1-5 (2023/24 to 2027/28)	<b>9,750</b>  London Plan target (1,950 per year) X 5	<b>14,307</b>  <ul style="list-style-type: none"> <li>• Large sites – 12,534</li> <li>• Small sites - 838</li> <li>• Small sites windfall - 935</li> </ul>
10 Year Years 6-10 (2028/29 to 2032/33)	<b>15,528</b>  9,750 (Yrs 1-5) + 5,778  1x London Plan target plus 4x SHLAA 2017+small sites (circa 957 per year – this is based on phasing periods of large sites in the SHLAA)	<b>21,202 (cumulative)</b>  <b>6,895 (Years 6-10)</b>  <ul style="list-style-type: none"> <li>• Large sites – 4953</li> <li>• Small sites -100</li> <li>• Small sites windfall – 1,843</li> </ul>
15 Year Years 11-15 (2033/34 to 2037/38)	<b>20,311</b>  15,528 (Yrs 1-10) + 4,783  5x SHLAA 2017+small sites (circa 957 per year – this is based on phasing periods of large sites in the SHLAA)	<b>24,381 (cumulative)</b>  <b>3,179 (Years 11-15)</b>  <ul style="list-style-type: none"> <li>• Large sites – 1,104</li> <li>• Small sites - 5</li> <li>• Small sites windfall – 2,070</li> </ul>

The target is in general conformity with the London Plan. The Mayor, in his statement of general conformity letter dated 28 February 2022 (Regulation 19 representation), wrote that he notes the inclusion of Policy SDS1 which ‘now includes a housing target of 20,311 new homes over the plan period, including 1,950 new homes per annum up until 2028/29, of which small sites comprise 414 per annum. This aligns with Wandsworth’s targets in the London Plan (including Policy H2 on small site allocations) and is welcome’.

Part A.1-4 of the policy sets out a hierarchy of locations within the borough where this housing need will be distributed<sup>3</sup>. Part A.1 identifies those parts of the borough that are more important for their strategic economic role or their regenerative potential and are defined through the Area Strategies within the Plan. This therefore includes the larger town and district centres identified in the London Plan. It also includes areas of significant change (York Road / Winstanley Estate and Roehampton) and concentrations of significant mixed

<sup>3</sup> A modification is proposed (PPAM/007) to the wording in criterion A in response to representation 606, to make clear that the locations listed in A.1 – A.4 are not interpreted as a sequential approach which requires opportunities in part 1 to be exhausted before those in parts 2, 3 and 4 are undertaken.

use and additional potential (the Riverside and the Wandle Valley). Parts A.2 and A.3 identify other allocated sites and small sites in areas of higher accessibility (partly in line with the ambition to enable and bring forward small sites), whilst A.4 acknowledges that there will be opportunities even beyond this in the wider borough.

The structure of this approach conforms with national guidance, and the emphasis of the London Plan. It allows a focus of development on town centres, which supports their continued vitality and viability, whilst taking advantage of highly accessible locations with a wide mix of uses to support residents.

**Criterion B** of the policy identifies a total capacity for the Area Strategies, which correspond to the locations set out in A.1. Clarification is contained within a footnote to the Plan which states that these figures are derived from the Council’s Housing and Economic Land Availability Assessment (HELAA, SD-047), which identifies future housing capacity over the whole plan period from 2023/24 to 2037/38. These figures – set out in the right-hand column of Table 1 (see above) are separate from the housing requirements and do not reflect the requirement contained in Part A of Policy SDS1. The total capacity has been identified as part of the HELAA process, which identifies the supply of housing (and economic) land to support the Local Plan. Specific details of the HELAA are set out in SD-047 and further detail on specific areas is set out in response to the second question of the Area Strategies and Site Allocation Policies, Main Matters 3 – 12.

**Criterion C** of the policy defines the means by which applications for new homes will be delivered. This reaffirms the pre-eminence of the Area Strategies, Site Allocations and the role of small sites in meeting the needs of the borough and thus, in conforming with the strategic guidance offered by both the London Plan and national guidance.

**Criterion D** references the need to protect existing Traveller sites and accommodate new sites for Travellers if they come forward or are required. This element of policy is covered in more depth in Matter 2 (below) and Matter 16.

**Criterion E** sets out the strategic approach to providing for employment needs across the borough. Part E.1 recognises the importance of retaining and enhancing employment sites and premises where appropriate. This is an important balance to make with such a heavy emphasis on the provision of new homes, and an important balance to make in strategic planning. Criterion E.1 sets the tone for an approach to employment, industrial and business sites that respects their role and seeks to maintain and develop it.

Wandsworth borough's past contribution to London's economy is recognised by the Plan, and the role of the Riverside area from Vauxhall through Nine Elms and towards Battersea and Wandsworth Town is reflected in the continuing desire to see new and existing employers in the regeneration of older traditional employment areas.

Reflecting the London Plan's CAZ and OA designations in the Nine Elms area, criterion E.2 seeks to deliver a net increase in new office space focused around existing or planned centres at Vauxhall and within Battersea Power Station. The Local Plan seeks to deliver larger scale office floorspace for higher value occupiers within these areas, supporting the role of the CAZ and reflecting the higher status of this area as part of the economic heart of the city as a whole.

Outside of the CAZ and OA, E.2 also draws upon the defined town and district centres as suitable locations for new office space and, at E.3 supports the retention and intensification of those established areas of economic activity within or close to centres, as part of long established areas of industry (such as the Wandle Valley) and within defined concentrations (such as the Riverside focal points). This again accords with the strategic approach, supporting existing hubs, enabling sustainable transport and connections, supporting town and other centres and contributing to a mix of uses and the growth and maintenance of ancillary uses within neighbourhoods and employment communities.

**Policy PM1** provides an overarching guide to development within the Area Strategy boundaries to ensure that development positively addresses the Plan's three principles, the objectives of each individual area and the remaining policies of the Plan. Policy PM1 ensures that where Site Allocations are clustered together (as in Wandsworth Town and Nine Elms in particular), owners, developers and landowners come together for the wider benefit of the cluster rather than for constituent parts. This can be achieved through a masterplan or concept framework. The policy also points to any specific supplementary guidance that exists for each of the strategy areas (e.g. the Wandle Delta SPD).

***Is Wandsworth's spatial strategy and the distribution of development as set out in Policies SDS1 and PM1 (Area Strategy and Site Allocations Compliance) supported by robust and up to date evidence and otherwise soundly based?***

Yes. Policies SDS1 'Spatial Development Strategy 2023-2038' and PM1 'Area Strategy and Site Allocations Compliance' are supported by robust and up to date evidence and are sound subject to a proposed modification in PM1 which is explained below.

Policy SDS1 'Spatial Development Strategy 2023-2038' sets out the housing requirement for the local authority as a whole – of 20,311 new homes. This is derived from the London Plan



target of 1,950 new homes per year up until 2028/2029, including on small sites; and then is derived from the 2017 SHLAA and a rolled over small sites target of 414 new homes per a year for the remaining years of the Local Plan period. It is expected that the London Plan will be revised prior to 2028/2029 and an associated revision of the Local Plan will account for the revised London Plan target. The housing requirement is set in accordance with the London Plan.

The capability of the Local Plan to meet the identified need (London Plan housing targets) has been assessed as part of the Housing and Economic Land Availability Assessment (HELAA) (January 2022) (SD-047) . Based on this work, sufficient capacity exists to meet (and exceed) the housing requirement, which is itself a minimum, with an appropriate and justified buffer. The capacity for each area is clearly set out in Table 2.2 of Policy SDS1. The strategy of delivery is set out in SDW part A and C. The distribution of development within each of these areas is based on the availability and deliverability of sites and the design-led approach – this was considered comprehensively and described within the HELAA (SD-047).

The Local Plan sets out detailed planning guidance for seven Area Strategies: Wandsworth Town (including the Wandle Delta sub-area); Nine Elms; Clapham Junction and York Road / Winstanley Regeneration Area; Putney; Tooting; the Roehampton and Alton Estate Regeneration Area; and Balham. The areas selected reflect their strategic importance and the Strategies set out how each area will accommodate change, rather than necessarily promoting growth. The Local Plan does not anticipate growth to occur equally across these locations and the total capacity of the areas (as informed by the HELAA (SD-047) is identified in Policy SDS1. The main growth areas are Nine Elms, Wandsworth Town (including the Wandle Delta sub-area), Clapham Junction, and the contribution made from boroughwide small sites. The Local Plan is not reliant on any single site allocation, nor on the provision of specific infrastructure required to support the delivery of the growth it plans for.

The protection of the Gypsy and Traveller site is based on the needs analysis within the needs assessment (SD-049) further information on the approach is contained in written statement MM16.

For economic/employment needs, the identified need is derived from the Employment Land and Premises Study (October 2020). This sets out a need for an additional 22,500 sqm of office floorspace in the non-CAZ areas of the borough, and for up to 8.6 ha of land required for industrial and related purposes, based on an identified additional floorspace need of 35,700 sqm for core industrial uses and up to 2.1 ha of land for waste. These targets are set

out within the relevant chapters. For economic/employment capacity, site allocations set out requirements for increases in industrial floorspace which is supported by robust protection elsewhere. These indicatively demonstrate enough capacity to meet demand. For office floorspace, potential capacity – including as part of allocated sites – exceeds demand (although policies do not require it to be delivered as such). Further information on capacities is set out within the HELAA (SD-047).

Identified waste needs as set out in the London Plan (waste apportionment targets) and the capacity and approach to meet this need is evidenced in the Waste Evidence base documents (SD-104 and SD-105).

The Local Plan does not require specific (larger-scale) infrastructure to deliver the planned growth; however the borough's Infrastructure Delivery Plan (January 2022) (SD-072) outlines the pipeline and future infrastructure that will assist in doing so. Infrastructure requirements for Nine Elms are set out within the Nine Elms Battersea Development Infrastructure Requirements Refresh Study 2019/2020 (November 2021) (SD-095).

Policy PM1 is considered sound. However, for clarification purposes the Council have proposed a main modification to PM1 B to remove this requirement – in relation to Comment ID 501, 565 – addressed via proposed main modification PPMM/001. This modification is proposed as it is considered to repeat section 38(6) of the Planning and Compulsory Purchase Act 2004.

***In setting a minimum requirement of 20,311 new homes for the plan period 2023 – 2038, does WLP Policy SDS1 make adequate provision to meet Wandsworth's housing needs and does the plan clearly set out a delivery trajectory that is achievable?***

The target (minimum requirement) for the period of the Local Plan (2023/24 – 2037/38) is 20,311 dwellings, which is made up of the 1,950 annual requirement of the London Plan to 2028/29 and an annualised target, which comes from the London Plan SHLAA 2017, plus small sites target, which was agreed as the Local Plan approach in accordance with para 4.1.11 of the London Plan<sup>4</sup>.

---

<sup>4</sup> The LHNA arrived at a Standard Method-based figure of 2,537, though this is an unconstrained figure. The London Plan is supported by evidence of need based on the 2017 London SHMA and the capacity-based assessment in the London SHLAA.

The figures provided in the London Plan are derived from the 2017 SHLAA, which provides the most comprehensive study available of the capital's capacity for housing delivery based on a consistent pan-London methodology.

Policy SDS1 also sets out, in criterion B, a table of capacity across the borough based on the HELAA (SD-047). The HELAA has considered all available sites<sup>5</sup> in the borough and attributed capacities to them to derive an overall figure for the borough from 2023/24 to the end of the plan period. The total capacity over these sites – the supply – is considered to be 24,380, which is beyond the minimum requirement of 20,311. This capacity has potential to meet and exceed the minimum target over the plan period.

Paragraph 68 of the NPPF requires that planning policies should identify a supply of:

- a) Specific, deliverable sites for years one to five of the plan period (*with an appropriate buffer*), and
- b) Specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the Plan.

Although the supply is currently forecast to be lower in years 6–10 and 11–15 relative to years 1–5, (see Table 1, above<sup>6</sup>), assuming all 21,202 dwellings are completed in the first 10 years of the proposed Plan period, the borough is on course to meet and possibly exceed the 2023/24–2032/33 ten-year housing target. This forecasted exceedance over the 10 years of the target provides a buffer that is consistent with the approach in the NPPF of including a buffer of housing land supply to ensure flexibility in sites coming forward is accounted for. Most of the ten year capacity (17,486) and indeed, the total 15 year plan period capacity – 18,342 dwellings – is attributed to the Area Strategy locations, with much of this coming from the major regeneration areas of Nine Elms and Wandsworth Town. A total of 12,266 comes from the allocations made within the Plan (Table 2), with 7,653 coming within the first five year period. These allocated sites are listed in Appendix 3, with an indication of how they will deliver housing across the three five-year phases of the Plan.

---

<sup>5</sup> NPPG advises on the nature of availability at para. 019 Reference ID: 3-019-20190722

<sup>6</sup> Also Table 4 of the HELAA

Table 2

Location	Capacity in Site Allocations	Capacity outside Site Allocations	Total Capacity
Area Strategy for Balham	44	28	72
Area Strategy for Clapham Junction and Winstanley/York Road Regeneration Area	3,137	67	3,203
Area Strategy for Nine Elms	3,417	5,000	8,417
Area Strategy for Putney	180	23	203
Area Strategy for Roehampton	1,012	2	1,014
Area Strategy for Tooting	122	84	206
Area Strategy for Wandsworth Town	2,885	625	3,510
Overarching Area Strategy for the Wandle Valley	402	217	619
Overarching Area Strategy for Wandsworth’s Riverside	595	504	1,098
Rest of Borough	472	718	1,190
Boroughwide small sites	-	4,848	4,848
<b>Total</b>	<b>12,266</b>	<b>12,116</b>	<b>24,382</b>

The HELAA is the key source of evidence for calculating the requirement and assessing future trajectory, whilst the [Authority Monitoring Report](#) (AMR) on Housing reports on completions and completions and updates future trajectory. The requirement of 20,311 and the capacity of 24,381 are set for the submitted Plan, and the latest published AMR relates to the period ending 2020/21. Policy SDS1 includes data to the end of the period 2020/21.

The passage of time enables those early years of the Plan to be updated, through the AMR, as projections become completions. The most recent iteration of the Authority Monitoring Report (AMR) is that for the financial year of 2021/22 (i.e. at the time of 31 March 2022)<sup>7</sup>. Using this data will enable an update of the trajectory in the Local Plan post-Examination to ensure that the Plan is based on the best available information.

On the basis of this new data, the Council have suggested an update to para. 2.104 and Table 2.3, which is included at Appendix 1.

**Housing trajectory**

The 2021/22 AMR shows an increase in the rate of completions in the early part of the 2020s (compared with the drop in completions over the period 2018-2021 shown in Table 4, below), with a more significant increase towards the middle of the decade. This

<sup>7</sup> Made available in late October 2022 as part of the continuous Authority Monitoring work.

demonstrates a healthy supply to the end of the London Plan period, with a significant buffer, though the pipeline drops off from year 2028/29 (Table 3, below and Appendix 2).

It is expected that a review of the London Plan will commence between the adoption of the Wandsworth Local Plan and the end of the current London Plan period, which will revise the borough’s housing requirement. The projected over-supply of 6,363 dwellings by 2028/29 suggests that the borough has sufficient capacity to maintain a higher rate of completions beyond 2028/29 than expected by the current London Plan when averaged out over future years.

Table 3: Housing trajectory between 2021/22 and 2028/29.

The London Plan period ends in 2028/29; the Local Plan period begins in 2023/24, and the AMR tracks the London Plan target from 2021/22.

London Plan Period		2021 London Plan							
Year		21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29
Completions	Past Completions	1,974							
	Projected Completions		2,108	3,712	2,846	4,008	2,424	2,957	1,934
	Cumulative Completions over Plan Period	1,974	4,801	7,793	10,639	14,647	17,072	20,029	21,963
Target	Annual Target	1,950	1,950	1,950	1,950	1,950	1,950	1,950	1,950
	Cumulative Target over Plan Period	1,950	3,900	5,850	7,800	9,750	11,700	13,650	15,600
Delivery against Target	Cumulative Completions above Cumulative Target	24	181	1,943	2,839	4,897	5,372	6,379	6,363

The projections set out in the AMR are a combination of the current monitoring of the progress of planning applications through the Council’s planning department, which includes, where available, phasing of completions based on responses to the annual Developer

Survey and the VNEB Phasing Study and the outcomes of the HELAA, which seeks to identify a supply of housing and economic land to support the proposed Local Plan.

The existing published trajectory relates to the year ending 2021/2022 and is set out in Appendix 2. Full details of the supply that feed the trajectory figures are available on the [Council's AMR website](#).

The trajectory is expected to continue to rise in the early part of the decade. Delivery is expected to stay strong through the middle of the decade as sites in Nine Elms, Clapham Junction and Wandsworth Town continue to deliver.

By the end of the Local Plan period, it is anticipated that the housing requirement set out in the London Plan will have been consistently exceeded, and there is sufficient scope within the trajectory for slippage and delay.

The trajectory appears to be falling away beyond the end of the London Plan target in 2028/29, but within this time new sites may emerge that are not yet deliverable or available, and Plan reviews can be anticipated. It is expected that a review of the London Plan will have taken place by this point, and the housing supply can be reviewed and updated. Monitoring will take place throughout this period on an annual basis.

**Updates to the Regulation 19 Plan text**

Table 2.3 of the Submitted Plan provides a snapshot of the position as it was at January 2020, based on the 2019/20 AMR. The commentary on this table at para 2.104 of the Plan is considered to be in need of a factual update to bring it in line with the latest figures of the 2021/22 AMR. The Council has suggested an update based on more recent data, and has set this out in Appendix 1.

The 2021/22 AMR sets out the completions for the final years of the 2016 London Plan, and for the first year of the current adopted London Plan. The completions in Wandsworth over this period are as follows:

*Table 4: Completions against the previous London Plan*

London Plan Period		2016 London Plan					2021 London Plan
Year		16/17	17/18	18/19	19/20	20/21	21/22
Completions	Past Completions	2,710	2,025	1,877	1,359	1,470	1,974

	Projected Completions						
	Cumulative Completions over Plan Period	2,710	4,735	6,612	7,971	9,441	1,974
<b>Target</b>	Annual Target	1,812	1,812	1,812	1,812	1,812	1,950
	Cumulative Target over Plan Period	1,812	3,624	5,436	7,248	9,060	2,040
<b>Delivery against Target</b>	Cumulative Completions above Cumulative Target	898	1,111	1,176	723	381	24

The table shows that whilst completions dipped below the previous London Plan target between 2019/20 and 2020/21 (coinciding with the sustained period of economic slowdown caused by the Covid -19 pandemic), the cumulative delivery of units was maintained above the required average of 1,812 units per year because of the significant delivery above the target through the previous years.

Table 2.3 within the Regulation 19 Plan anticipated a delivery of 2,571 units in the year 2021/22, but this has fallen below expectations. However, at 1,974 dwellings, this rate of completion is above the target of 1,950 within the new London Plan, and projections for the early years of the plan remain above 1,950 through the mid-2020s.

***Does WLP adequately address the needs for all types of housing and the needs of different groups in the community (as set out in paragraph 62 of NPPF)?***

***National Planning Policy Framework***

Paragraph 62 of the NPPF states that within a context of assessing the minimum number of homes required in an area, ‘the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies (including, but not limited to, those who require affordable housing, families with children, older people, students, people with disabilities, service families, travellers, people who rent their homes and people wishing to commission or build their own homes)’.

***London Plan 2021***

The London Plan aims to be consistent with national policy. It contains a range of policies at the regional level aimed at meeting the needs of the whole population, and sets out a strategic direction for this. Policies within the Plan cover affordable housing, supported and

specialised housing, student accommodation and accommodation for Gypsies and Travellers. Within this mix, the policies also cover different forms of housing that could meet the needs of different groups, including build-to-rent and co-living (large-scale purpose-built) accommodation.

### ***Wandsworth Local Plan***

The housing chapter of the Wandsworth Plan covers all elements of housing relevant to the borough, including a range of types of housing for a broad cross section of the community.

Policy SDS1 provides an annual housing target, which reflects the London Plan figure for the borough of 19,500 dwellings over the plan period, or 1,950 dwellings per year. This figure is derived from a pan-London assessment of need, which adjusts the overall need based upon the capacity of the borough. This headline figure therefore addresses the broad need for new housing in Wandsworth overall. Homes that are considered to be non-self-contained contribute to the housing requirement in accord with paragraph 4.1.9 of the London Plan and are monitored separately.

The detailed policies of the Plan aim to address specific needs within this and set out how they relate to this broad figure. These policies are discussed in more depth below.

### *Local Housing Needs Assessment*

The key piece of evidence informing the housing policies of the Plan is the [Local Housing Needs Assessment](#) (LHNA) (SD-043). The LHNA responds to, and is compliant with, the requirements of the NPPF; in approach and structure it follows the Revised Planning Practice Guidance (PPG), in particular the paragraphs that address ‘housing and economic needs assessments’. The LHNA is used by the Council to:

- inform Wandsworth’s housing requirement within the emerging Local Plan;
- determine the need for affordable housing for Wandsworth;
- determine the need for specialist forms of housing including sheltered, extra care and supported housing; and
- inform wider housing policy in the emerging Local Plan.

The LHNA covers all aspects of housing need and housing type relevant to this borough, considering demographic changes and the existing situation and draws out recommendations for a wide range of housing requirements from affordable housing to older people’s housing, adapted housing and emerging forms of housing such as build-to-rent and co-living.



*Affordable housing, LP23*

The Council expects affordable housing to be delivered in accordance with the London Plan, with an aim to contribute to the Mayor’s strategic target of 50% of all homes to be affordable. The policy – which has also been tested for viability and deliverability through the [Whole Plan Viability Assessment \(SD-052\)](#) – seeks to provide 50% low cost rent products, 25% First Homes and 25% other intermediate products on developments that create 10 or more dwellings (gross). The policy recognises the substantial need for low cost rented homes, but also aims to support those people with lower household incomes who would not qualify for social housing nor be able to afford market housing.

The policy therefore aims to deliver affordable housing in accord with both national and regional advice that would aim to meet the needs of those most in need whilst also seeking to fulfil the need of those in the ‘buy/rent gap’ – those not eligible for social housing yet not able to buy in the local market.

*Housing Mix, LP24*

To address the overall housing need, the Plan provides a preferred housing mix at Policy LP24. This mix – which is set out separately for market and affordable housing – responds both to the demographic trends present in the borough and to the stated preferences of households on the Wandsworth Housing Register. This mix is derived from work undertaken as part of the LHNA.

The policy is proactive in seeking a balance between the type of housing that the evidence suggests is need to meet housing need, and the context into which any proposal is being set. The policy seeks to ensure that new proposals avoid any over-concentration of a housing type, and draws attention to the need for new family housing as well as protecting what family housing already exists. The motivation for looking at this is to ensure that Wandsworth borough’s communities are mixed and balanced. The policy asks applicants to demonstrate how their proposals meet these requirements, and to justify any departure.

The housing mix policy is sufficiently flexible to allow developers to respond to market demand. The policy does not take a prescriptive or rigid approach, and criterion E allows a consideration of the context the site, recognising that each case will be distinct and will have unique features that may require a more nuanced approach. This, however, does not automatically mean that the requirements and considerations of the policy should be cast aside.

*Protecting the Existing Housing Stock / Conversion, LP25 and LP26*

In order to protect family-sized dwellings from conversion, the Council has had a long-standing policy approach of protecting existing houses, family-sized flats and maisonettes. It also aims to ensure that family housing is not lost in meeting the target for small sites set out in Policy SDS1 and further described in Policy LP7.

Policy LP7 works alongside Policies LP25 (Protecting the Existing Housing Stock) and LP26 (Residential Conversions). Policy LP25 seeks to protect existing self-contained housing, in accordance with Policy H8 of the London Plan which allows for the loss of housing where it is replaced by new housing at existing or higher densities. Exceptionally, Policy LP25 allows for the loss of no more than two self-contained non-family sized units where it creates one family sized dwelling of less than 130sqm. Policy LP26 ensures that dwellings of 130sqm or less cannot be converted into flats unless the existing dwelling is unsuitable for families, and that the conversion of dwellings of more than 130sqm create at least one family sized dwelling, and no more than one studio. These policies help to support the existing stock of housing, particularly larger family units.

Recognising the proportion of new housing coming forward at the smaller sizes, and the opportunity for conversion of large houses to smaller flats and apartments, the LHNA supports the retention of the residential conversions policy to enable a mix of housing to be provided and available within the borough. It also supports the conversion of the very largest homes – where there is limited demand – into smaller units where family sized units can also be provided.

The position taken in the Plan strikes a balance between the need to protect family housing and to address the small sites target by allowing conversions of larger family houses. It is particularly important to monitor this in the current time, when the pipeline of housing anticipated within the borough is expected to deliver smaller homes rather than family sized homes.

#### *Housing Standards, LP27*

In terms of ensuring that housing is of a decent standard and includes consideration for a range of different needs and abilities, Policy LP27 relies on the detailed advice given within the London Plan, which is set out at Policies D5 to D7 and D12<sup>8</sup>. These policies cover a wide range of issues associated with accessibility and inclusivity which should ensure that housing in Wandsworth meets the needs of a diverse range of people, including those with

---

<sup>8</sup> The GLA is also producing a [Housing Design Standards LPG](#), which is expected to be published in late 2022. This will provide further detailed advice on housing design which will be couched in terms of the London Plan policies.

normal human ailments that do not need specialist or specific housing or care solutions that are covered by other policies in the plan. This might include general ailments associated with, say, growing older. Considering inclusivity and accessibility broadly will enable all people to adapt their homes as they age without having to consider moving on.

Additionally, the policy covers aspects of development that address design elements that could undermine an occupant's enjoyment of their living space (and arguably affect a person's mental or spiritual health). This includes aspect, noise, ventilation and pollution, amenity space and tenure blindness, all of which can be addressed through thoughtful and considered design and architecture.

A modification is proposed to the Plan (PPMM/094) to address the absence of a locally defined standard for external amenity space, which has been historically applied in Wandsworth, but is absent from the London Plan policy requirement. This would ensure a reasonable provision of external amenity space, and also provide additional space in accommodation that was intended for use by families.

*Purpose-Built Student Accommodation, LP28*

The LHNA examines the intentions of higher education establishments in Wandsworth and assesses whether there is any impact on the housing market in the borough. Both of Wandsworth's higher education establishments – University of Roehampton and St. George's – have accommodation strategies that seek to address accommodation needs in the plan period.

Policy LP28 allows for the provision of new purpose-built student housing in the borough, provided it meets the needs of a defined higher education establishment within reasonable access of the borough. To help achieve this, such development should be located where public transport options are good. In the context of this policy, the supporting test defines this as having a PTAL rating of 4 or higher, including those locations supported by good walking and cycling infrastructure. In line with the earlier policy, LP24, the policy seeks to avoid an over-concentration of student housing within a neighbourhood. Issues around amenity and management will also need to be addressed.

*Housing with shared facilities, LP29 and Build to Rent, LP30*

The LHNA recognises the importance of the private rented sector in Wandsworth, and the role within this that Homes in Multiple Occupation (HMOs) play in meeting housing needs. Also falling within this consideration are emerging forms of housing such as Build-to-Rent and co-living (large scale purpose built shared living). It also recognises difficulties in

controlling and monitoring aspects within the sector owing to the permitted development regime and an element of free will amongst landlords and tenants over what is done with their own property. It also recognises that some aspects of the sector suffer from poorer quality.

The policies are generally open to the development of these facilities with the consistency of ensuring that existing family homes are not compromised, and the developments do not result in an over-concentration of a particular type of housing provision, predominantly to ensure that neighbourhoods sustain mixed and balanced communities.

In the case of large-scale purpose-built shared living, the policy acknowledges the presence of Policy H16 within the London Plan, and defers to it for detailed matters<sup>9</sup>. The over-riding concern of part C of Policy H29 is the contribution that this form of housing makes to mixed and balanced communities. Whilst it is a form of housing that provides a certain need, it is not a route to affordable housing, nor is it a product that could provide an alternative to affordable housing owing to relatively high rents. This form of housing generally has a model which provides a large volume of shorter-term tenancies, and it is difficult to see how it can provide secure affordable homes for those who need it. The policy seeks to protect land where there are outstanding planning consents for conventional housing, or where conventional housing could be provided.

Policy LP30 references London Plan Policy H11, but states a clear preference to secure low-cost rented housing which is delivered in accordance with criteria A.1 and A.2.

*Specialist Housing for Vulnerable People, LP31*

Policy LP31 takes a lead from London Plan Policies H12 and H13 and deals with the needs of older people and those requiring specialist care accommodation (whether or not they are older). The policy wording deals with specialist and supported housing, examples of which are set out in the supporting text (this list is not intended to be definitive, and will include other forms of specialist and supported accommodation not included in this list). Older persons housing without a care element are dealt with through the general policies of the plan.

The 120 units of specialist older persons' housing, if applied to the LBW plan period as set out in the LHNA (2019-38), would produce 2,280 units (or 1,800 over the period 2023-38), well in excess of the need identified in the LHNA (1,443).

---

<sup>9</sup> The GLA has consulted upon a [detailed LPG](#) for this form of accommodation. It is acknowledged that the policy may need to be modified to respond with this guidance.

***Does WLP make adequate provision to meet the housing requirement for Gypsies, Travellers and Travelling Showpeople in Wandsworth?***

*National Planning Policy Guidance*

The National Planning Policy Framework (NPPF) sets out the Government’s planning policies for England and how these should be applied. In respect of issues relating to the planning requirements of Gypsies and Travellers, particularly accommodation, the Framework should be read in conjunction with ‘Planning Policy for Traveller Sites’, which was published in August 2015.

Paragraph 62 of the NPPF says that the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies, which includes the needs of travellers.

*Planning Policy for Traveller Sites (2015)*

Planning Policy for Traveller Sites sets out how Travellers’ housing needs should be assessed, and asserts that the five year supply of deliverable sites for Travellers should be assessed separately from the five year supply of specific deliverable housing sites.

The Government’s aims in respect of Traveller sites are set out at paragraph 4. Para 9 of the document says that local planning authorities should set pitch targets for Gypsies and Travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.

In producing their Local Plan, paragraph 10 states that local planning authorities should:

- identify and update annually, a supply of specific deliverable sites sufficient to provide 5 years’ worth of sites against their locally set targets
- identify a supply of specific, developable sites, or broad locations for growth, for years 6 to 10 and, where possible, for years 11-15
- consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries)
- relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population’s size and density
- protect local amenity and environment.

Para. 11 states that criteria should be set to guide land supply allocations where there is identified need. Where there is no identified need, criteria-based policies should be included to provide a basis for decisions in case applications nevertheless come forward. Criteria based policies should be fair and should facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community.

*London Plan 2021*

The London Plan deals with Gypsy and Traveller accommodation at Policy H14. It requires boroughs to protect existing sites and to meet the identified need for permanent pitches. Plans must include a ten-year pitch target, based upon an up to date needs assessment. Authorities should audit sites working with the occupiers to identify existing and potential issues.

The supporting text of the policy commits the Mayor to a London-wide Gypsy and Traveller accommodation needs assessment, which is ongoing at the time of writing and is not yet available for use in development plans. It is expected that the results of this study will be available in early 2023, and will set out targets for individual boroughs. Wandsworth Council is participating in this study, which will involve a site visit of the Trewint Street site and primary and secondary data collection. This also fulfils the borough's Duty to Cooperate commitment in this respect and will give the Council a full picture of the need within the borough.

In the absence of this updated London-wide study, the policy advises either using the borough targets in Table 4.4 (and Wandsworth's ten year target is 7) or use their own updated needs assessment.

*Wandsworth Gypsies and Travellers Accommodation Needs Assessment (April 2022)*

The Council's principal evidence for the policy approach of the Local Plan is held in the updated Gypsies and Travellers Accommodation Needs Assessment (April 2022).

The borough has one licensed traveller site, at Trewint Street in Earlsfield. It was established in 1975, and has met the needs of the borough to the current day. Whilst fairly centrally located in the borough, the boundary with Merton forms the southern boundary to the site. At April 2022, the site consisted of 11 pitches, with seven households residing across eight of the pitches leaving three vacant.

The Local Plan contains Policy LP32, which protects the site at Trewint Street, and allows for the provision of new sites, should they come forward. Policy SDS1 references the provision

for Gypsies and Travellers set out in LP32. The policy accords with the London Plan as it is based upon an updated needs assessment which provides new data, concluding that, ‘there is no evidenced requirement or need for additional pitches on the Trewint Street site or elsewhere in the wider Borough’.

The Housing team within the Council manage the site on a day-to-day basis and visit the site weekly, dealing with resident concerns and responding to issues and problems.

*Consultation across boundaries and duty to co-operate*

The Duty to Co-operate Statement (SD-014, April 2022) sets out the Council’s discussions on the strategic matter of Travellers. Kingston is the only neighbouring borough that is not able to meet its own need to provide for Travellers, and Wandsworth has set out that it has insufficient flexibility to assist Kingston in this regard (Wandsworth’s boundary with Kingston is limited to about 600m). The remaining neighbouring boroughs have highlighted that they intend to meet their identified needs for Gypsies and Travellers, and as a result this issue is not considered to be a cross-boundary issue. This position is reiterated in the Statement of Common Ground between Wandsworth and the neighbouring authorities (WBC-005, September 2022).

There were no comments received from prescribed bodies or neighbouring authorities regarding Gypsy and Traveller accommodation during the Regulation 19 consultation stage. Comments at the Regulation 18 stage were generally supportive of the provision provided by the policy.

The Greater London Authority is currently undertaking a pan-London Gypsy and Traveller Study which will identify needs to 2031. The Mayor commented (at Regulation 18 and 19) on the approach taken in the Wandsworth Plan at Policy LP32, and references this forthcoming work. He reiterates the approach set out in the London Plan which should be taken by authorities in making an assessment of need for Gypsies and Travellers into the future, but makes no comment on the Wandsworth policy itself (i.e. in respect of conformity or otherwise). It is noted, however, that the GLA has funding available to help boroughs and registered providers to secure new pitches and refurbish existing ones.

*Housing Requirement*

The Accommodation Needs Assessment shows that the Trewint Street site has been an adequate provider of plots and pitches for Wandsworth’s travelling community for a number of years.

Back in 2008, when the Greater London Authority commissioned a Pan-London needs assessment, Wandsworth's figures were very low, with a maximum need over the period 2007-2017 of 10 residential pitches. This is within the capacity at Trewint Street. Those Travellers on the waiting list have been low in number since 2011, and were down to zero in 2019/20. At this time, there were seven households on the site, and three vacant plots (one household occupied two plots).

By July 2020, there was one vacant pitch and one applicant on the waiting list. As of October 2022, 10 of the 11 pitches are tenanted and 1 is void. The void has been pre-allocated for the 1 applicant on the waiting list. As of October 2022, there are six applicants on the housing queue identifying as Gypsy / Traveller (one homeless, four general needs and one on the older persons queue). Three of the four on the general queue are seeking a three-bedroom property and one of these is a current resident on Trewint Street.

There have been no unauthorised encampments in the last five years recorded by the Housing Department. This would also suggest that there is no need for pitches that is not being met by the current provision.

An annual return is provided to the Government for the [Traveller Caravan Count](#).

*Development of the site to the north*

The land to the northern boundary of the Trewint Street Traveller site has recently been developed (planning application reference 2019/1083). In addition to the two rounds of statutory consultation required as part of the planning application, the applicant (The Collective) submitted a statement of community involvement which set out a series of meetings with the neighbouring Traveller site. These were also attended by a councillor and a housing officer from the Council. These meetings discussed works proposed between the two sites including neighbouring amenity, boundary treatment, construction traffic management, access to facilities and height and massing.

In conclusion, the Council does make adequate provision to meet the housing requirement for Gypsies and Travellers, and is participating in the current Pan-London research to understand this more widely. Further questions relating to Traveller provision and the Gypsy and Traveller Accommodation Needs Assessment are set out in Main Matter 16.

***Does WLP make adequate provision to meet Wandsworth's economic growth requirements for the plan period and its timescale for delivery?***



Economic uses are defined within the Local Plan as comprising office and industrial uses (including storage and logistics distribution). The objectively assessed needs for such uses within the borough are set out in the Employment and Premises Study 2020 (SD-034), which in turn has been informed by various London wide-research, including the London Industrial Land Demand Study 2017, the London Industrial Land Supply and Economy Study 2015, and the London Office Policy Review 2017.

For the assessment of the borough's identified need for office premises, the ELPS considers two distinct property markets within the borough, which cater for different users. The first is the emerging office market located within the Vauxhall Nine Elms Battersea Opportunity Area (VNEB OA), in London's Central Activities Zone (CAZ). This comprises high quality and high value modern office space which caters for businesses operating at a regional, national or international scale, which is significantly different to the stock of office premises found elsewhere in the borough. The second and larger component – which comprises over 80% of the borough's total office floorspace – is a local/sub-regional market which caters for small and medium-sized businesses serving customers within the borough and in areas across the south and west of London. This distinction is set out within the Local Plan in paragraph 18.6.

The ELPS identified that approximately 205,000 sqm of planned office development within the VNEB OA is expected to have been completed by 2024, which is corroborated by the Council's latest Authority Monitoring Report on Non-residential Development Report (2019-20 and 2020-21)<sup>10</sup>, which suggest there was a pipeline of 191,678 sqm of office floorspace within this location for the year 2020-21. The study noted that the planned redevelopment of the VNEB OA is creating a step change in office provision in the borough and will form an important addition to the Central London office market, with analysis indicating that the level of supply is likely to provide for demand for such space arising within future demand in this market.

The borough's ELPS indicates that within the local / sub-regional office market in Wandsworth (assumed to be all locations outside of the VNEB OA), there is a net additional requirement for 22,500 sqm of office floorspace to 2034, once vacant floorspace and transitional vacancies have been factored in. The capacity for office floorspace is set out within the borough's Housing and Economic Land Availability Assessment (SD-034). This analysis has identified that the supply of office capacity over the period to 2037/38 outside the Vauxhall, Nine Elms and Battersea Opportunity Area is approximately 52,000 sqm, which meets the identified need. As set out within the HELAA, this is not considered to be

---

<sup>10</sup><https://www.wandsworth.gov.uk/planning-and-building-control/planning-policy/local-plan/local-plan-monitoring/authority-monitoring-report-amr/>

an oversupply as the biggest source of this supply (32,964 sqm) relates to existing planning applications, indicating a high level of demand for this use. The majority of floorspace identified within the borough's 'potential sites' (e.g. site allocations) are located within town centres, which are identified within paragraph 86 of the NPPF as the preferential location for this use. It is important to recognise, furthermore, that the Local Plan provides a degree of flexibility in how many of the sites are brought forward, in many instances permitted office and/or residential development within appropriate locations for both. This enables the Local Plan to be responsive to market conditions and is consistent with paragraph 82 of the NPPF.

The ELPS forecasts a net requirement of 35,700 sqm, or its land equivalent value of 5.5ha, is required to accommodate the demand for 'core industrial uses', which arises in an approximately 3:1 ratio for additional storage and distribution uses (Use Class B8) and light industrial uses / research and development facilities (falling within Class E). The need for these industrial uses offsets a smaller anticipated reduction in the floorspace required by the borough to accommodate general industrial uses (Use Class B2).

As set out within the Council's HELAA (SD-034), the industrial capacity over the period to 2037/38 is 44,828 sqm, which meets the identified demand to 2033/34 of 35,700 sqm, providing a buffer of 9,128 sqm. This buffer will help to accommodate identified waste requirements or will serve as a 'frictional vacancy'. This is identified within the ELPS study as the land take (assumed to be 1ha, with the vacancy rate at the time of the study being 1.4ha) required to allow for the efficient churn of occupiers. Given the constrained nature of the borough's industrial land supply, the limited availability of underutilised land, and the generally high values commanded by land within central London, it is realistic to assume that the land available to accommodate 'frictional vacancy' may at times be lower than the 1ha quantum identified within the ELPS.

Whilst they are not identified as 'economic uses' within the Local Plan, it is noted herein that the borough is able to meet its identified need for retail, as identified within the Council's Town Centre and Retail Needs Assessment (SD-041). This document sets out that there is no clear need to identify or plan for an increase in retail and food/beverage floorspace provision over the majority of the Local Plan period (up to 2035), as the short to medium term growth is expected to be absorbed by the implementation of commitments, the repurposing or take up of existing vacant floorspace, and by increases in turnover efficiency. The assessment does indicate that there is scope for new development in the long term (by 2040), including as an element of residential or economic-led mixed-use development. This is accounted for through site allocations within the Local Plan, although it is important to recognise that the redevelopment, refurbishment or the expansion of sites can also play an

important role in ensuring the vitality of centres. Further information on town centre uses is set out within the Council's Written Statement on Main Matter 18 – Ensuring the Vitality, Vibrancy and Uniqueness of the Borough's Centres (Policies LP41 to LP48).

**Appendix 1: Suggested Updates to Para. 2.104 and Table 2.3 in the Submitted Plan**

Additions are shown in italics and underline, with deletions in ~~strikethrough~~.

The number of new homes to be provided between 2023 and 2038, as set out in SDS1, has had regard to the housing target for the borough set out in the London Plan of a minimum of 1,950 dwellings per annum to 2028/29. The Council’s latest Authority Monitoring Report, 2021/22, demonstrates that there is sufficient capacity provided for through the Wandsworth Local Plan ~~2016~~ (taking into account Site Allocations, extant and implemented planning permissions which have yet to be completed) to deliver 1,950 dwellings per annum for the period 2019/20 (which is the start date of the London Plan) to 2022/23 – i.e. the period prior to the start date of this Plan. It also demonstrates an expectation to meet the 10 year London Plan target.

Year	Completions
2015/2016	<del>2,735</del>
2016/2017	<del>2,710</del>
2017/2018	<del>2,025</del>
2018/2019	<del>1,877</del>
2019/2020	<del>1,359</del>
2020/2021	<del>1,422</del> <u>1,470</u>
2021/2022	<del>2,571 (projected)</del> <u>1,974</u>
2022/2023	<del>2,169</del> <u>2,108</u> (projected)
2023/2024	<del>2,392</del> <u>3,712</u> (projected)
2024/2025	<del>2,460</del> <u>2,846</u> (projected)
2025/2026	<del>1,414</del> <u>4,008</u> (projected)
<u>2026/2027</u>	<u>2,424 (projected)</u>
<u>2027/2028</u>	<u>2,957 (projected)</u>
<u>2028/2029</u>	<u>1,934 (projected)</u>

## Appendix 2: Housing Trajectory

- **Table I: housing trajectory to 2029**
- **Table II: Housing trajectory from 2029**
- **Graph I: Housing trajectory and managed target**
- **Graph II: Housing target over time**

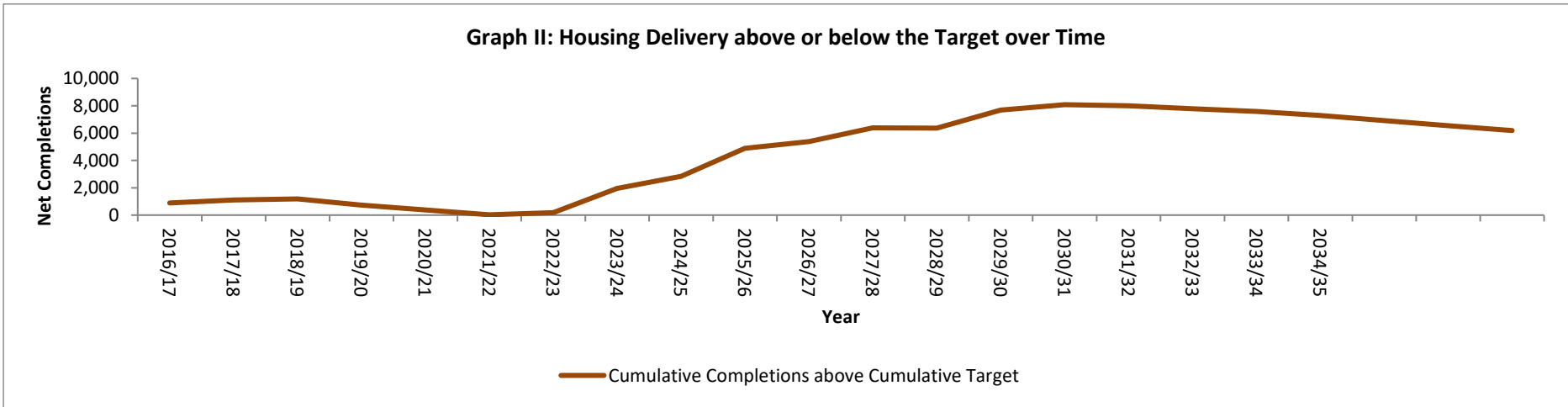
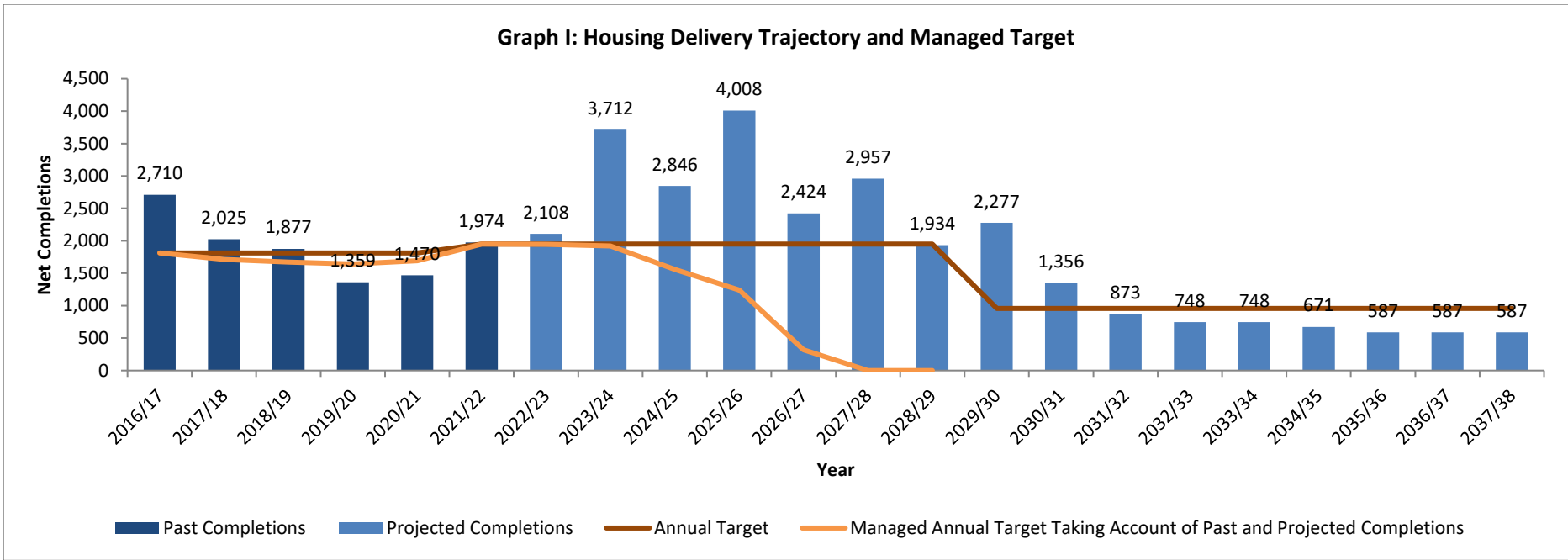
**Table I**

### Housing Trajectory to 2029

London Plan Period		2016 London Plan					2021 London Plan							
Year		16/17	17/18	18/19	19/20	20/21	21/22	22/23	23/24	24/25	25/26	26/27	27/28	28/29
<b>Completions</b>	Past Completions	2,710	2,025	1,877	1,359	1,470	1,974							
	Projected Completions							2,108	3,712	2,846	4,008	2,424	2,957	1,934
	Cumulative Completions over Plan Period	2,710	4,735	6,612	7,971	9,441	1,974	4,081	7,793	10,639	14,647	17,072	20,029	21,963
<b>Target</b>	Annual Target	1,812	1,812	1,812	1,812	1,812	1,950	1,950	1,950	1,950	1,950	1,950	1,950	1,950
	Cumulative Target over Plan Period	1,812	3,624	5,436	7,248	9,060	1,950	3,900	5,850	7,800	9,750	11,700	13,650	15,600
<b>Delivery against Target</b>	Cumulative Completions above Cumulative Target	898	1,111	1,176	723	381	24	181	1,943	2,839	4,897	5,372	6,379	6,363
	Managed Annual Target Taking Account of Past and Projected Completions	1,812	1,712	1,673	1,644	1,692	1,950	1,947	1,920	1,561	1,240	318	0	0

**Table II****Housing Trajectory after 2029**

London Plan Period		Further Alterations to the London Plan (Local Plan target applied)								
Year		29/30	30/31	31/32	32/33	33/34	34/35	35/36	36/37	37/38
<b>Completions</b>	Past Completions									
	Projected Completions	2,277	1,356	873	748	748	671	587	587	587
	Cumulative Completions over Plan Period	24,240	25,596	26,469	27,217	27,965	28,636	29,223	29,809	30,396
<b>Target</b>	Annual Target	957	957	957	957	957	957	957	957	957
	Cumulative Target over Plan Period	16,557	17,514	18,471	19,428	20,385	21,342	22,299	23,256	24,213
<b>Delivery against Target</b>	Cumulative Completions above Cumulative Target	7,683	8,082	7,998	7,789	7,580	7,294	6,924	6,553	6,183
	Managed Annual Target Taking Account of Past and Projected Completions									



**Appendix 3: List of Site Allocations’ Capacity and Phasing expectations**

Note: list includes all allocations; some allocations are non-residential, e.g. wharves / employment. Sites may be allocated to allow the Local Plan to be responsive to market conditions, which is consistent with national policy.

Site Allocation ID	Capacity calculation source	Area Strategy	Net Capacity	Probability*	Net Capacity Probability	Capacity projected within	First Phase					Second Phase					Third Phase				
							2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35	2035/36	2036/37	2037/38
BA1	UDS	Balham	59	100%	59	44	0	0	0	0	0	0	5	5	5	5	5	5	5	5	5
CJ1	UDS	Clapham Junction and Winstanley/York Road Regeneration Area	988	8%	79	59	0	0	0	0	0	0	7	7	7	7	7	7	7	7	7
CJ2	UDS	Clapham Junction and Winstanley/York Road Regeneration Area	202	100%	202	202	0	0	20	20	20	20	20	20	20	20	20	20	0	0	0
CJ3	UDS	Clapham Junction and Winstanley/York Road Regeneration Area	243	100%	243	243	243	0	0	0	0	0	0	0	0	0	0	0	0	0	0
CJ4	UDS	Clapham Junction and Winstanley/York Road Regeneration Area	1038	8%	83	47	0	0	0	0	0	0	0	0	0	0	12	12	12	12	12
CJ5	Planning applications	Clapham Junction and Winstanley/York Road Regeneration Area	1932	99%	1932	1861	35	35	0	597	597	597	0	0	0	0	0	0	0	0	0
CJ6	Planning applications	Clapham Junction and Winstanley/York Road Regeneration Area	204	100%	204	184	10	10	0	55	55	55	0	0	0	0	0	0	0	0	0
CJ7	UDS	Clapham Junction and Winstanley/York Road Regeneration Area	10	100%	10	10	10	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NE1	UDS	Nine Elms	154	100%	154	154	0	0	154	0	0	0	0	0	0	0	0	0	0	0	0



London Borough of Wandsworth  
 Main Matter 2 – Spatial Development Strategy (Policies SDS1 and PM1)

NE2	Planning application/s	Nine Elms	307	100%	307	307	0	0	0	102	102	102	0	0	0	0	0	0	0	0
NE3	UDS	Nine Elms	208	100%	208	208	0	0	208	0	0	0	0	0	0	0	0	0	0	0
NE4	UDS	Nine Elms	184	100%	184	184	0	0	184	0	0	0	0	0	0	0	0	0	0	0
NE5	UDS	Nine Elms	37	100%	37	37	0	0	37	0	0	0	0	0	0	0	0	0	0	0
NE6	Planning application/s	Nine Elms	347**	100%	347	347	0	116	116	116	0	0	0	0	0	0	0	0	0	0
NE7	UDS	Nine Elms	0	100%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NE8	UDS	Nine Elms	0	100%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NE9	UDS	Nine Elms	155	8%	12	12	0	12	0	0	0	0	0	0	0	0	0	0	0	0
NE10	UDS	Nine Elms	7	8%	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
NE11	UDS	Nine Elms	264	8%	21	21	0	4	4	4	4	4	0	0	0	0	0	0	0	0
NE12	Planning application/s	Nine Elms	2573	100%	2573	1979	297	297	0	461	461	461	0	0	0	0	0	0	0	0
NE13	UDS	Nine Elms	168	100%	168	168	0	34	34	34	34	34	0	0	0	0	0	0	0	0
OUT1	UDS	Rest of Borough	44	100%	44	35	0	0	3	3	3	3	3	3	3	3	3	3	3	3
OUT2	UDS	Rest of Borough	253	8%	20	15	0	0	0	0	0	0	2	2	2	2	2	2	2	2
OUT3	Planning application/s	Rest of Borough	813	100%	443	400	174	195	10	21	0	0	0	0	0	0	0	0	0	0
OUT4	Planning application/s	Wandsworth's Riverside	106	80%	85	85	0	0	0	28	28	28	0	0	0	0	0	0	0	0
OUT5	UDS	Rest of Borough	5	100%	5	5	0	1	1	1	1	1	1	1	1	1	0	0	0	0
OUT6	UDS	Rest of Borough	16	100%	16	16	0	2	2	2	2	2	2	2	2	2	0	0	0	0
PUT1	UDS	Putney	97	100%	97	49	24	24	0	0	0	0	0	0	0	0	0	0	0	0
PUT2	UDS	Putney	63	8%	5	4	0	0	0	0	0	0	0	0	0	0	0	0	0	0
PUT3	Planning application/s	Putney	121	100%	121	121	0	0	0	40	40	40	0	0	0	0	0	0	0	0

London Borough of Wandsworth  
 Main Matter 2 – Spatial Development Strategy (Policies SDS1 and PM1)

PUT4	UDS	Putney	7	8%	1	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
PUT5	UDS	Putney	32	8%	3	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
PUT6	UDS	Putney	5	100%	5	5	5	0	0	0	0	0	0	0	0	0	0	0	0	0
RIV1	Planning application/s	Clapham Junction and Winstanley/York Road Regeneration Area	136	100%	136	136	0	0	0	45	45	45	0	0	0	0	0	0	0	0
RIV2	UDS	Clapham Junction and Winstanley/York Road Regeneration Area	280	100%	280	227	0	0	17	17	17	17	17	17	17	17	17	17	17	17
RIV3	Planning application/s	Wandsworth's Riverside	3	100%	3	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
RIV4	UDS	Wandsworth's Riverside	77	100%	77	62	0	0	5	5	5	5	5	5	5	5	5	5	5	5
RIV5a	Planning application/s	Clapham Junction and Winstanley/York Road Regeneration Area	168	100%	168	168	0	0	0	56	56	56	0	0	0	0	0	0	0	0
RIV5b	Planning application/s	Wandsworth's Riverside	72	100%	72	36	18	18	0	0	0	0	0	0	0	0	0	0	0	0
RIV6	UDS	Wandsworth's Riverside	64	100%	64	52	0	0	4	4	4	4	4	4	4	4	4	4	4	4
RIV7	UDS	Wandsworth's Riverside	207	100%	207	168	0	0	13	13	13	13	13	13	13	13	13	13	13	13
RIV8	UDS	Wandsworth's Riverside	71	100%	71	58	0	0	4	4	4	4	4	4	4	4	4	4	4	4
RIV9	Planning application/s	Wandsworth's Riverside	93	100%	93	47	23	23	0	0	0	0	0	0	0	0	0	0	0	0
RIV10	UDS	Wandsworth's Riverside	107	8%	9	6	0	0	0	0	0	0	1	1	1	1	1	1	1	1
RIV11	UDS	Wandsworth's Riverside	81	100%	81	81	81	0	0	0	0	0	0	0	0	0	0	0	0	0
RO1	Planning application/s	Roehampton	815	80%	652	652	0	0	0	217	217	217	0	0	0	0	0	0	0	0
RO2	UDS	Roehampton	130	100%	130	107	0	8	8	8	8	8	8	8	8	8	8	8	8	8
RO3	UDS	Roehampton	303	100%	303	253	0	0	0	0	0	25	25	25	25	25	25	25	25	25
TO1	UDS	Tooting	54	100%	54	41	0	0	0	0	0	0	5	5	5	5	5	5	5	5
TO2	UDS	Tooting	1171	8%	94	76	0	0	6	6	6	6	6	6	6	6	6	6	6	6

TO3	UDS	Tooting	5	100%	5	5	0	1	1	1	1	1	0	0	0	0	0	0	0	0
WT1	UDS	Wandsworth Town	11	100%	11	11	0	0	2	2	2	2	2	0	0	0	0	0	0	0
WT2	Planning application/s	Wandsworth Town	50	100%	50	25	13	13	0	0	0	0	0	0	0	0	0	0	0	0
WT3	UDS	Wandsworth Town	0	100%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
WT4	UDS	Wandsworth Town	462	100%	462	462	0	0	46	46	46	46	46	46	46	46	46	0	0	0
WT5	UDS	Wandsworth Town	31	100%	31	25	0	0	2	2	2	2	2	2	2	2	2	2	2	2
WT6	UDS	Wandsworth Town	172	100%	172	172	0	0	17	17	17	17	17	17	17	17	17	0	0	0
WT7	UDS	Wandsworth Town	7	100%	7	7	0	0	1	1	1	1	1	1	1	1	1	0	0	0
WT8	Planning application/s	Wandsworth Town	105	80%	84	84	0	0	0	28	28	28	0	0	0	0	0	0	0	0
WT9	UDS	Wandsworth Town	141	100%	141	106	0	0	0	0	0	0	12	12	12	12	12	12	12	12
WT10	UDS	Wandsworth Town	452	8%	36	21	0	0	0	0	0	0	0	0	0	0	5	5	5	5
WT11	UDS	Wandsworth Town	0	0%	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0	0
WT12	Planning application/s	Wandsworth Town	480	80%	384	384	0	0	0	128	128	128	0	0	0	0	0	0	0	0
WT13	Planning application/s	Wandsworth Town	554	80%	443	443	0	0	0	148	148	148	0	0	0	0	0	0	0	0
WT14	UDS	Wandsworth Town	130	8%	10	8	0	0	0	0	0	0	1	1	1	1	1	1	1	1
WT15	UDS	Wandsworth Town	191	100%	191	155	0	0	12	12	12	12	12	12	12	12	12	12	12	12
WT16	UDS	Wandsworth Town	260	8%	21	16	0	0	0	0	0	0	2	2	2	2	2	2	2	2
WT17	UDS	Wandsworth Town	35	8%	3	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
WT18	UDS	Wandsworth Town	7	100%	7	5	0	0	0	0	0	0	1	1	1	1	1	1	1	1
WT19	UDS	Wandsworth Town	24	100%	24	24	0	2	2	2	2	2	2	2	2	2	0	0	0	0
WT20	UDS	Wandsworth Town	910	100%	910	910	0	91	91	91	91	91	91	91	91	91	0	0	0	0
WT21	UDS	Wandsworth Town	25	100%	25	25	0	25	0	0	0	0	0	0	0	0	0	0	0	0

WT22	UDS	Wandsworth Town	22	8%	2	0	0	0	0	0	0	0	0	0	0	0	0	0	0
WV1	Planning application/s	Wandle Valley	402	100%	402	402	0	0	0	134	134	134	0	0	0	0	0	0	0

\*Average probability for sites with more than 1 planning permission

100% applied to capacity of sites Under Construction, approved planning permission and sites with no planning permission considered to have 100% probability of development within the Plan Period

90% applied to capacity of sites with planning permission pending a decision

80% applied to capacity of sites with planning permission recommended at Committee subject to legal agreement

8% applied to capacity of sites with no planning permission considered to have low probability of development within the Plan Period

0% applied to capacity of sites with no planning permission considered to have no probability of development within the Plan Period