

Wandsworth Local Plan Review

Examination on the Publication Draft Local Plan Review

Submissions on behalf of Northport FPR Limited

Matter 2 – Policy SDS1

1. The Inspectors partially pose the following questions in respect of this Matter:

- ***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?***

- ***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)?***

2. In short in respect of at these aspects of the SDS our response is no to both questions.

The Draft Plan Submitted Approach

3. IN addition to comment on draft Policy SDS1 we have made submissions in respect of an ‘Omission Site’ that we are aware that the Inspectors have indicated they do not wish to discuss now. This site is located partially within the Putney area.

4. We have made submissions that will be discussed later in this Examination in respect of Matter 20 – Green and Blue Infrastructure. Those submissions demonstrate that the Councils approach to some of its Green Infrastructure designations is flawed when considered in light of both the PPG and the London Plan.

5. As a result we consider that the Councils approach to its distribution of new homes through SDS1 and also the Area Strategies is at least in part flawed as land that may have contributed to the delivery of new homes has been incorrectly discounted at an early stage.

6. Notwithstanding our submissions on these matters the Council has dismissed these. However in our view if parts of the wider evidence base are flawed, as we indicate, that must affect the evidence that underlies the evidence used to set out the 'Spatial Development Strategy' and draft Policy SDS1.
7. In this respect we note that only 203 new homes have been proposed for the Putney Area as Part B of the Policy as that is what is suggested is the capacity identified. However if the evidence base for land within or on the edge of the Putney area is flawed then surely so is the evidence for identifying only a capacity of 203 new homes in this Area.
8. Further the Policy is unclear as to the position with a Major site that may straddle an Area Strategy boundary. It states "*2. Permitting development on major sites allocated within the Local Plan outside of the Area Strategy boundaries where they comply with all other relevant policies of the Local Plan*". Although the draft plan also states that the Area Strategy boundaries are only 'indicative' and "*should be used to understand the general geographic focus of the strategy in each place, rather than define hard and fast boundaries*" (paragraph 3.7).
9. In terms of the second bullet point above this relates to the type of housing and the needs of different groups. There is the potential for some degree of crossover here with the latter discussion on Putney as Matter 6. However we feel the need to raise this here given the Inspectors question.
10. Draft Policy SDS1 as noted above suggests a capacity of 203 units within Putney. The proposed allocations to deliver these units are all closely to the area around Putney High Street and so within the Town Centre. It is therefore highly likely that these new homes will be in the form of apartments, if not in some instances if not all, above commercial development.
11. There is unlikely to be any opportunity to provide for true family homes in the form of houses. There is a real need for family homes of this nature in the Putney area.
12. The Housing Needs Survey (SD-043) indicates a suggested mix of market homes where 20-35% are family homes (para 10.70). It then states, "*Furthermore in heavily urbanised locations such as LBW density requirements will mean that the built form will be skewed towards flatted development which tend to be more suitable for smaller homes*". But it continues "*That said when opportunity arrives for more family units this should be encouraged*" (para 10.72).

13. The Putney Area and its environs to the east lie within the Thamesfield Ward. Here the Housing Needs Survey indicates that:

*The ward saw substantial amount of development between 2011 and 2019, with around **1,050 units** added to the housing stock. Of these, 23% were affordable. Supply achieved a balance by size, with 18% affordable and 14% of market units of 3 and 4 bedrooms. **95% of these new homes were flats. (our emphasis)**(para 10.140)*

14. This in our view is further evidence that the Strategy with particular reference to the 203 new homes in the Putney Area on the sites allocated is most unlikely to do anything but continue this trend towards flatted provision, rather than family homes with gardens.

15. The WLP does not therefore address all the needs from the Housing Needs Survey.

Conclusion

16. That the Strategy for the distribution of housing is unsound, at least in part, as other matters that will have been taken into account in formulating the Strategy are themselves not in conformity with the PPG, the London Plan and so are unsound.
17. Further that as part of this Strategy the approach to the capacity for new homes in the Putney area seeks to continue the provision of flatted developments at the expense of the provision of houses with gardens and will not address the needs from the Housing Needs Survey.

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