

Wandsworth Local Plan Examination

Main Matter 2 – Spatial Development Strategy (Policies SDS1 and PM1)

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?

• 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?

Part A of Policy SDS1 is unsound because it is ineffective, unjustified and contrary to London Plan policy.

Policy SDS1, Part A is unduly restrictive in terms of specifying which sites for housing development will be supported by the Council. Part A states that the Council will adopt a ‘sequential’ approach to permitting land for housing. This implies that land that falls within categories 2,3 and 4 will be refused until all capacity has been tapped entirely in category 1.

This is against the spirit of the London Plan which seeks to encourage land for housing from a more diverse range of sites, including the intensification of more suburban areas to allow for more small sites. The supply of housing through small sites is a strategic priority for the London Plan.

Part 3 reflects better the aim of the London Plan – supporting housing on small sites within areas of higher accessibility – but it is subservient to sites in category 1. It is also vague about what might be judged an area of higher accessibility. The London Plan does encourage greater intensification around transport hubs up to a radius of 800m and we note that this metric is referred to in the Wandsworth Draft Local Plan in Policy LP7.

To assist decision-makers and to ensure soundness, Part A should be amended by removing the word ‘sequential’.

Part A 3 should be amended by including a reference to Policy LP7.

Part A 4 should be amended by including a reference to Policy LP7.

• 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 Plan is unsound in relation to the housing requirement. A requirement for 20,311 homes over the fifteen-year plan period equates to an average of 1,354 dwellings per year. Put another way, the Plan would be providing 1,950dpa for the first ten years, but just 162dpa for the last five.

This would be far below the level of supply that the London Plan indicates would be needed to continue to cater for and meet London’s housing needs – 1,950dpa. It is also far below the level of need indicated by the Council’s own local assessments.

Furthermore, the borough housing requirements set by the London Plan are already constrained. The London Plan treats London as a single housing market area. It has been unable to identify sufficient land to accommodate its entire housing need. The need is for

66,000 homes a year (London Plan, para. 4.1.1), but it can only identify land sufficient to accommodate 52,000 homes a year. Consequently, there is a significant and strategic shortfall in the supply of homes against need across London as a whole.

The Council's assessment of housing need, using the revised standard method – undertaken on 16 December 2020, indicates that the local housing needs figure is 3,425dpa. Paragraph 1.5 of the *Wandsworth Local Housing Needs Assessment*, December 2020, states that the stepped approach set out in PPG results in a figure of 2,537 or 45,666 between 2019 and 2037. Paragraph 1.28 concludes:

The Council should consider its objectively assessed need for housing to be 2,537 dwellings per annum and seek to meet this as much as possible, subject to sufficient supply of deliverable sites being identified.

We note in the *Wandsworth Local Housing Needs Assessment*, December 2020, that the report concludes that the affordable housing model generates a total net need of 3,575 dwellings per annum for the period 2019 and 2037 (paragraph 1.10).

Additionally, the London Plan is under-delivering against its annual housing requirement to provide 52,000 net additions each year for the ten years between 2019/20 and 2028/29 (London Plan Table 4.1).

DLUHC Live Table 122: Net additions to the dwelling stock

London		
Year	2019/20	2020/21
Net additions	40,870	37,183

Against a requirement for 104,000 homes to be provided in the first two years of the London Plan coming into effect in 2019/20 (52,000 x 2), London is already facing a deficit of 25,947 homes.

We acknowledge that the London Plan sets a housing requirement for just ten years and invites the London boroughs to set housing requirements for years 11-15 or longer based on assessments of large site capacity and rolling forward the small site calculation (414dpa in the case of Wandsworth). Even so, in view of the scale of the housing need in London, including the unmet housing need, like other boroughs in London, Wandsworth should roll-forward the annual average figure of 1,950dpa for the last five years of the plan. This would result in an overall housing requirement for 29,250. The Council can then prepare a new plan once a new London Plan is published. At the very least, the Wandsworth Local Plan should aim to provide at least 414dpa from rolling-forward the small sites component. As the London Plan states at para. 4.1.11:

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.

The Council needs also to clarify in the Plan what annual average housing figure it is using for monitoring purposes, including the calculation of the five-year housing land supply and the Housing Delivery Test. This cannot be 1,354dpa for the first decade because this would be lower than the London Plan requirement. Equally, in view of the evidence of housing need, and the requirements of national policy, it would be unacceptable to plan for merely 162dpa for the last five years of the plan.

Housing trajectory

We refer to our representations. As we have discussed above, it is hard to understand what the housing requirement is for the period 2029/30 to 2032/33.

The *Housing and Economic Land Assessment, 2022*, provides a housing trajectory on page 10. This shows delivery peaking towards the middle of the plan but falling dramatically in years 2029/30 to 2032/33.

The requirement according to Policy SDS1 is for 20,311 homes over 15 years, but there could be capacity for 24,380 homes over the same period. Once the 19,500 homes target has been deducted for the first decade, this would leave a figure of 4,880 homes or 976 homes on average in the last five years.

While this is better than the small site assumption (414dpa) it is still well below the evidence of the likely level of housing need.

Small sites

The plan is unsound in relation to planning for small sites because it is contrary to national policy and the London Plan.

Increasing the supply of homes from small sites is a strategic priority for London (London Plan Policy H2). It is also a requirement of national planning policy (NPPF, para. 69).

Table 2 of the *Housing and Economic Land Assessment, January 2022* identifies that over the 15-year plan period there is land for 943 homes on identified small sites and a possible capacity for a further 4,848 homes on small sites through windfall. This provides a possible total supply of 5,791 homes on small sites, or 386 per year. This is lower than the London Plan requirement for 414 homes a year, which the London Plan expects local authorities to roll-forward to cover years 11-15. National policy requires plan-makers to identify land to accommodate at least 10% of the housing requirement on sites of one hectare or less. This would require land for 2,031 homes. This is not the same as windfall supply so Wandsworth Local Plan would be failing in that regard. Similarly, the London Plan invites plan makers to identify sites and not rely solely on windfall.

For the first ten years, the Council has planned for only 372 homes per year on average which is lower than the London Plan requirement for an average of 414 homes a year.

We recognise that identifying small sites is challenging for local authorities and sometimes it may not be possible, but we are concerned that in combination with the very low housing targets for years 11-15 the Council's Plan is not creating the conditions conducive to support an increase in housing delivery in London.

• 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)?

The Wandsworth Local Plan appears to make no provision in policy for older persons housing in the manner the London Plan expects in Policy H13. Increasing the supply of appropriate accommodation for older people is a strategic priority for the Mayor of London.

Policy H13 sets a requirement in Wandsworth for the Council to aim to 120 units of older people's housing a year. This is not a binding target, but a benchmark for performance. It forms a component of the overall housing need to be provided within Wandsworth for 19,500 net additional homes between 2019/20 and 2028/29.

Para.17.56 requires applicants to provide older persons housing to demonstrate a local need. This is unsound because the London Plan has established the need for older persons housing across London and apportioned this among the boroughs. The London Plan states that these benchmarks can inform local assessments of need (para. 4.13.9) but as the Council has not produced one for the Plan, the Plan should be amended to default to the London Plan requirement.

Para. 17.57 refers to the London Plan indicative annual target but qualifies this by requiring applicants to consider more detailed local assessments of need. This is unsound because the London Plan has undertaken the assessment of need. Applicants should not be forced to demonstrate a case for older persons housing when the London Plan has already established this need, and doubly so if the indicative target has not been achieved in any one year.

Policy LP31 should be amended to refer to the indicative annual requirement of 120 units of accommodation each year.

Second, we note that para.17.55 lists examples of the types of accommodation that Policy LP31 applies to. While the list is not exhaustive, by specifying types there is the risk that a provider of a type of older persons housing not included in the list would have the application refused. We are concerned that the list may prevent the supply of specialist older persons housing that does not provide an element of care but is specifically designed and managed for older people (minimum age of 55 years) – a type of older persons housing which is explicitly supported by the London Plan. See London Plan para. 4.13.5.

It would be better to delete para.17.55 and refer instead to the criteria provided in the London Plan at paras. 4.13.4-4.13.6.