

## Wandsworth Local Plan Examination

### Main Matter 16 – Providing Housing (Policies LP23 to LP32)

- **Are the policies relating to Affordable Housing justified by appropriate available evidence, having regard to national guidance, and local context, and SDS1?**

Part A of Policy LP23 is unsound because it is contrary to the London Plan. Part A makes no reference to the ‘threshold approach’ to affordable housing – policy H5 of the London Plan – devised to incentivise the delivery of affordable housing, whereby applicants on non-public sector owned land would benefit from a fast-track to planning permission if they committed to providing no less than 35% affordable housing. Part A makes no reference to this. Part E refers to the consideration of viability evidence, but not the London Plan policy as a whole.

The Wandsworth Local Plan should clarify its position on the Mayor’s threshold policy and whether this will apply in Wandsworth or not.

The evidence of the viability of 50% affordable housing is variable across the borough. We note paragraph 7.21 in the Whole Plan Viability Assessment, which observes this about the 50% affordable housing policy:

*The results in **Table 7.5** show that this requirement would result in most of the tested value area 1 typologies and about half the tested value area 2 typologies may be challenged in delivery viable development. But likewise, around half the tested value 2 area typologies and all the tested value 3 area typologies would still be able to deliver 50% affordable units along with other Reg 19 Local Plan policies, and it is in these two areas where the bulk of site allocations are located.*

In general, the viability evidence points to strong values in the borough able to sustain the policy expectations of the Plan in the locations that will be key. Nevertheless, not everywhere can deliver 50% affordable housing, and with the potential for rising costs plus falling sales values as we enter a period of economic uncertainty, we recommend that the Council embraces the Mayor of London’s threshold approach.

Part G of the Policy LP23 which disapplies or qualifies the application of the Vacant Building Credit (VBC) is unsound because it is contrary to national policy. An attempt to disapply this was attempted by the Mayor of London via the new London Plan, but this was rejected by the examining panel. The Government introduced the VBC in order to incentivise the delivery of housing on brownfield land. The development circumstances in Wandsworth are no different from other boroughs in London or elsewhere in the country to justify a departure from national policy.

**HBF**  
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