Wandsworth Local Plan Examination

Matter 2 – Spatial Development Strategy (Policy SDS1)

Statement of Common Ground between London Borough of Wandsworth and the Home Builders Federation

Context

During the discussion on point 3 of Main Matter 2 ('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 Home Builders Federation sought clarification on the borough's housing trajectory against the adopted London Plan target.

Key Issue for Clarification

The Home Builders Federation (HBF) seeks clarity on the Council's ability to meet the ten-year housing target of the adopted London Plan, which covers the period 2019/2020 to 2028/29.

The Borough's completions (figures from 2019/20 to 2021/22) and projections (2022/23 – 2028/29) for this period are set out in Table 1 below. It demonstrates that there is a deficit of 1,071 units in the first two years against the London Plan target, which is largely as a result of the economic slowdown during the Covid 19 period. However, there is a substantive surplus in the remainder of the Plan period which is projected to translate into an overall surplus over the ten year monitoring period. The projected pipeline demonstrates that the Council anticipates sufficient provision of homes within the remainder of the Plan period against the London Plan target to mitigate any under-provision against the annualised target in individual years. The surplus of 5,292 provides a buffer (as required by the NPPF, para 74) against under-delivery in the Plan period and/or provision for future years beyond the London Plan period, when the pipeline is less certain. It also accommodates the deficit from years 1 and 2.

Table 1: Delivery against London Plan Target (period 2019/20 to 2028/29)

	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	Total
Completions*	1,359	1,470	1,974	2,108	3,712	2,846	4,008	2,424	2,957	1,934	24,792
Target	1,950	1,950	1,950	1,950	1,950	1,950	1,950	1,950	1,950	1,950	19,500

^{*}Past completions 2019/20 to 2021/22; projected completions 2022/23 to 2028/29. Source: 2021/22 Housing AMR, (note: figures are rounded)

Table 2 demonstrates that the Council is able to deliver a completion rate of 1,950 units during the six-year period of the London Plan target that falls within the fifteen year period of the Local Plan (2023/24-2028/29). The annual target beyond the London Plan period is in accordance with para. 4.1.11 of the adopted London Plan. The NPPF, at para 68, requires authorities to identify a supply of 'specific deliverable sites or broad locations for growth for years 6-10' and only 'where possible' for years 11-15, acknowledging the greater uncertainty further into the future.

The trajectory / pipeline for the Plan period is shown below against the target defined by the London Plan in Policy H1 and paragraph 4.1.11.

Table 2: Delivery against Local Plan Target (period 2023/24 to 2037/38)

	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	Total
Completions*	3,712	2,846	4,008	2,424	2,957	1,934	2,277	1,356	873	748	748	671	587	587	587	26,315
Target**	1,950	1,950	1,950	1,950	1,950	1,950	957	957	957	957	957	957	957	957	957	20,313

^{*}Projected completions for the Local Plan period. Source: 2021/22 Housing AMR, figures rounded

Housing Trajectory Methodology

The Housing Authority Monitoring Report (AMR) is prepared annually by the Council. The AMR methodology involves the collection, processing and analysis of data stored and managed in the Council's Development Monitoring Database. The AMR reports on key topics relevant to the Local Plan, including housing delivery and monitors completions against the London Plan and Local Plan targets - detailing the 5-year land supply calculation and the housing trajectory for the whole Local Plan period.

^{**}London Plan Target is applied from 2023/24 to 2028/29 (end of London Plan period); in 2029/30 to 2037/38 the target is 957 derived from SHLAA 2017+Small Sites target; figures rounded.

The housing trajectory in Table 2 was prepared from projected dates of development completion provided by developers and applicants through the Developer Survey (September 2022). This was carried out for major sites within the Vauxhall Nine Elms Battersea (VNEB) Opportunity Area and sites outside VNEB with approved planning permission for six or more residential units of conventional supply and fifty or more units of non-self contained supply. Where it has not been possible to contact the applicant or agent and no alternative source of phasing was available, and for all other sites, phasing assumptions based on past delivery are applied.

Closing

This Statement of Common Ground clarifies the Council's housing trajectory position in relation to delivery against London Plan targets and delivery over the course of the 15 year period of the Local Plan. HBF confirm that by presenting the information clearly and simply as set out above, any concerns raised regarding the Council's ability to meet the London Plan housing targets are allayed.

The Council is content to have a trajectory (Table 2) included within the Plan at Policy SDS1 to assist with the understanding of the future housing supply, acknowledging that this would represent a position in time and that the housing trajectory is updated annually in the AMR. The Council will monitor delivery against both the London Plan and Local Plan targets through its AMR.

This agreement results in no additional and/or main modifications to the Wandsworth Local Plan, other than the inclusion of the trajectory as discussed and agreed with the Inspectors at the Local Plan Examination Hearing Day 2 (16 November 2022), Main Matter 2.

Signed on behalf of the London Borough of Wandsworth						
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Andrea Kitzberger-Smith		22 November 2022				
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Signed on behalf of the Home Builders Federation					
Name	Signature	Date			

James Stevens	22 November 2022
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