



Appendix 3F: Schedule of Representations to Regulation 19 Consultation (in Plan Order) with Council Response

Version 1.0 April 2025

The table within this appendix lists the representations received to the Publication (Regulation 19) consultation held on the Wandsworth Local Plan Partial Review.

Notes

Representations have been structured under the policy heading they relate to, or under a 'General or Introductory' category where they were not made with respect to a specific policy.

Where representations clearly identify which policy specific comments relate to, these comments have been assigned to these policy headings as directed. However, where representations are not explicit in terms of the relationship between comments and policies, the Council has exercised judgement in assigning comments to the most relevant policy headings. Consequently, representations covering multiple policies have been split across all relevant policy headings. Representations which have been split can be identified in the 'Respondent' column where the Row IDs of other representations from that respondent will be identified. It is recognised some comments, although most relevant to one policy, may equally have been intended to apply to multiple policies, for example comments relating to an evidence base document. Whilst these comments will have only been identified against the most relevant policy, for completeness, and to ensure the process of splitting comments does not result in a loss of meaning, a copy of all representations in the exact form they were received in can be found at Appendix 3G.

In relation to the columns concerning Legal Compliance, Soundness and Duty to Co-operate, and those titled 'Representation' and 'Modifications Suggested', comments have been assigned as directed by representors where they have used the comments form. However, where representors did not use the comments form, the Council has exercised judgement in assigning content to these columns. The main body of a representor's submission will be included in the 'Representation' column. The Council has typically not sought to populate the other columns unless it is clear from the representation that the representor is raising a specific comment around legal compliance, soundness or duty to co-operate, or is putting forward a clear modification.

In relation to the 'Council's response' column, it is recognised that the Council's justification for its policies has been informed by a comprehensive evidence base and that it is not appropriate or efficient to reproduce large parts of this evidence base in this appendix. Therefore, the contents of the 'Council's Response' column should be treated as a high-level summary of either how representations have been addressed or the Council's response to the matters raised. Where appropriate, the Council's Response will signpost to wider documents where a full justification for the policy approach can be found.

The ordering of representations reflects the order in which they were processed and not the order in which they were received or any other order. The Council has not edited the content of representations except for basic formatting (in the interests of clarity) or redaction (where representations included personal data). A copy of complete, original representations has been entered into the submission library in a redacted form in Appendix 3G.

ID #	Respondent	Policy	Do you consider that the Local Plan:			Do you consider the Local Plan is unsound because it is not:	Representation	Modification(s) suggested	Council's Response
			Is Legally compliant	Is Sound	Complies with the Duty to Co-operate				
General or Introductory									
1	Ms Lila Palmer obo Charcot House Residents Association	General	Y	Y	Y		I think the review is considering the long term effects of building new homes and providing enough housing for all individuals in the borough.		Comment Noted.
2	Ms Juliana Annan	General	Y	Y	Y		I support Wandsworth Council review of its local plan with the goal of the needs of getting more social housing from private development from the borough		Support Noted.
3	Bill Majrowski [See also Row 193]	General					<p>Wandsworth Council should impose a moratorium on new car parking spaces as a part of new building developments. Car parking spaces take up valuable inner-city land which must be used for the provision of social housing not cars.</p> <p>We also need secure storage space for bikes for all residents including children and this needs to be prioritized above the provision of car parking spaces.</p> <p>The evidence is also very clear that car use poses a very significant risk to children in terms of death and injury caused by road traffic accidents. Air pollution exposure from road traffic also causes significant lifelong impairment of children's health and wellbeing including impaired cognitive development, increased risk of psychiatric illness and impaired lung growth which results in greater adult susceptibility to respiratory disease. Children living in low-income households in social housing are more likely to live in areas of high air pollution and are therefore more likely to experience the adverse effects of car use. As children living in low-income households do not have the ability to move away from areas of high air pollution Wandsworth Council has an absolute duty to minimize their air pollution exposure and the best way to do this is a moratorium on the provision of car parking spaces in new build developments.</p> <p>The evidence is also very clear that car use significantly restricts local economic growth in addition to causing air pollution and multiple public health and road accident hazards - not to mention the prohibitive costs to Wandsworth Council of maintaining roads damaged by excessive car use. As economic growth is the top Government priority this is not compatible with any policy which either directly or indirectly increases car use. A moratorium on the provision of new car parking spaces in new build and social housing developments is essential to meet the Government priority of sustainable economic growth.</p> <p>All new developments must meet the highest energy efficiency standards to reduce costs for social housing tenants. This must include triple glazing as standard with reflective coatings to reduce overheating during the summer months and a moratorium on the use of gas boilers which should be replaced with heat pumps. All new builds should have solar panels installed on their roofs as an energy saving feature.</p>	All new developments must meet the highest energy efficiency standards to reduce costs for social housing tenants. This must include triple glazing as standard with reflective coatings to reduce overheating during the summer months and a moratorium on the use of gas boilers which should be replaced with heat pumps. All new builds should have solar panels installed on their roofs as an energy saving feature.	Comment Noted. The Partial Review of the Local Plan seeks to review six policies in total, consistent with the objectives published at the Regulation 18 stage. The adopted Wandsworth Local Plan (2023-2038) sets out effective policies for car parking and energy efficiency. The Council has not identified a need to review these policies at this time. The performance of these policies will continue to be monitored and reviewed as necessary in the future.

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4	Linda Stevens	General					<p>A few questions related to the housing proposal;</p> <p>Unsure this is the correct format to raise questions/comments I hope they are valid.</p> <p>Will social housing applicants be means tested?</p> <p>When the income of tenants in social housing rises to a level it's possible to buy a house on the open market, will it be a condition that the house is then released to another applicant on low income?</p> <p>Will there be more checks on social housing occupants to stop sub letting at full market rent of social housing / affordable housing?</p> <p>Will the selling of social/affordable houses be halted to ensure they remain?</p> <p>Is the government paying for the new housing developments in the area?</p> <p>Only non green belt sites to be used for any future housing development.</p> <p>Please contact me if there is an alternative requirement for voicing concerns.</p>		<p>Questions Noted. These issues are beyond the remit of the Local Plan and are generally matters for social housing provider(s).</p> <p>In relation to Green Belt sites, it is relevant to note that Wandsworth Borough contains no Green Belt land.</p>
5	Michelle Statton obo Historic England	General					<p>Thank you for the opportunity to comment on the Wandsworth's Regulation 19 Consultation on the Local Plan Partial Review. As the Government's adviser on the historic environment, Historic England is keen to ensure that the conservation and enhancement of the historic environment is taken fully into account at all stages and levels of the Local Plan process.</p> <p>The partial review is focused on:</p> <ul style="list-style-type: none"> • Policy LP23: Affordable Housing • Policy LP24: Housing Mix • Policy LP28: Purpose-Built Student Accommodation • Policy LP29: Housing with Shared Facilities • Policy LP30: Build to Rent • Policy LP31: Specialist Housing for Vulnerable People and for Older People <p>Having looked at the proposed changes, there does not appear to be any implications for the historic environment. However, should any heritage issues arise as a result of the consultation please do not hesitate to get in touch.</p> <p>It should be noted that this advice is based on the information that has been provided to us and does not affect our obligation to advise on, and potentially object to any specific development proposal which may subsequently arise from these documents, and which may have adverse effects on the environment.</p>		<p>Comment Noted.</p>

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6	Justine McNeill obo Beautify Balham	General					<p>The proposed redevelopment in Balham, termed the "Balham triangle", is situated between Bedford Hill and Balham Station Road. Existing buildings along Bedford Hill are for the most part 3-4 storey Victorian buildings. The proposal indicates the redevelopment would envisage buildings of 7-8 storeys high which is contrary to the council's vision that new builds should blend into the surrounding architecture to keep the coherence and character of Balham centre. 7-8 storey buildings could dwarf all the other neighbouring housing stock and be an eyesore in the centre of Balham.</p> <p>The proposal suggests the creation of an underground car park for Sainsburys and residents of the new build. Providing a car park for residents of the new build when the council is encouraging residents not to use cars seems a little ludicrous. Furthermore, the excellent train and tube lines in very close proximity to the new build would argue against the use of a car.</p> <p>There is a further issue relating to the damage caused by WWII bombing. The site was severely damaged due to bombs and Balham residents who have lived here all their lives speak of an unexploded bomb still unearthed below the parking. Additionally, the land was gifted to the residents of Balham.</p> <p>As residents of Balham, we often notice flooding along Balham Station Road and Bedford Hill Road. Balham sits below Clapham and Streatham Hill and, with higher frequency of violent storms, could suffer from more flooding. However, none of the plans make provisions for preventative solutions with regards to flooding or urban heat island effect. As temperatures rise and volumes of precipitation increase it will be urgent to find shade and effective drainage solutions. The Balham Triangle could play an active role in mitigating flooding by introducing nature-based solutions such as sustainable drainage units (SDUs) and planting trees or pocket parks and would mitigate unsustainable temperatures. Additionally, adding trees and further greening in this area, alongside the redevelopment, would create a stepping stone for biodiversity from Tooting Common to Wandsworth Common and encourage the establishment of green corridors. It's crucial we adapt to the changes caused by climate change and all redevelopments should include measures to mitigate these effects and permit residents and businesses to be resilient and thrive.</p>		<p>Comments Noted.</p> <p>The Partial Review of the Local Plan seeks to change six policies only, consistent with the objectives published at the Regulation 18 stage. It is not proposed to affect the remaining adopted Local Plan policies including site allocation BA1 (Sainsbury's Car Park, Bedford Hill, SW12). A number of these issues may be material to any future planning application on the site but are not directly relevant to the Local Plan Partial Review. Any issues relevant to the Local Plan can be considered should a need be identified to review Site Allocation BA1 in the future.</p>
7	Sharon Jenkins obo Natural England	General					<p>Thank you for your consultation request on the above Strategic Planning Consultation, dated and received by Natural England on 13th January 2025.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England have no comments to make on your consultation request for the Local Plan Partial Review and Sustainable Appraisal for Wandsworth Council.</p> <p>We also note the changes to six of your other policies for consistency or clarity as listed below:</p> <ul style="list-style-type: none"> • Policy LP23: Affordable Housing • Policy LP24: Housing Mix 		<p>Comment Noted.</p>

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							<ul style="list-style-type: none"> • Policy LP28: Purpose-Built Student Accommodation • Policy LP29: Housing with Shared Facilities • Policy LP30: Build to Rent • Policy LP31: Specialist Housing for Vulnerable People and for Older People <p>For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.</p>		
8	Miss Rosalind Graham hunt [See also Row 204]	General					We need more mobility/wheelchair flats.		Comment Noted. The Wandsworth Local Plan (2023-2038) and London Plan set out effective requirements around wheelchair accessibility. The Partial Review of the Local Plan seeks to review only six policies and a need to propose changes to the number of accessible flats that must be provided in new developments has not been identified at this time. The performance of planning policies will continue to be monitored and reviewed where necessary.
9	Raffaele Sava [See also Row 109, 136, 153, 167, 186 and 195]	General					<p>Subject: Response to the Wandsworth Local Plan Partial Review (Regulation 19 Consultation)</p> <p>Dear Planning Policy Team,</p> <p>I am writing to submit my response to the Regulation 19 Consultation on the Wandsworth Local Plan Partial Review. I appreciate the Council's efforts to review and strengthen policies related to affordable housing, housing mix, and specialist accommodation to better meet local needs. Below are my comments on the proposed updates:</p> <p>Conclusion</p> <p>Overall, I support the direction of the Local Plan Partial Review but urge the Council to take stronger steps to ensure affordability, quality, and accessibility in new developments. Thank you for the opportunity to contribute to this important consultation.</p>		Support Noted.
10	Vincent Gabbe obo The Metropolitan Police	General	Y	N	Y	Positively Prepared, Justified, Effective, Consistent with National Policy	<p>Previous Representations submitted to the Wandsworth Draft Infrastructure Delivery Plan</p> <p>We attach representations submitted on behalf of the MPS towards the Wandsworth draft Infrastructure Delivery Plan which were submitted via email on the 4th September 2024. The representation as attached contains information relevant to the current Local Plan consultation, such as the requirements for Neighbourhood Offices in the Borough and the need to account for additional policing infrastructure requirements as a result of additional growth through S106 contributions.</p> <p>We therefore request that information relating to Wandsworth contained in the attached representation is acknowledged within the partial review Local Plan document, and any subsequent Local Plan review documents. The attached representation is particularly relevant, as in delivering the required level of policing that London requires over the next ten years, the MPS will need to grow by c4,500 Police Officers, requiring a growth of estate of c85,500sq m in order to provide sufficient accommodation for these numbers. There is therefore a pressing need to acknowledge the need to support the growth in MPS</p>		<p>Comments Noted.</p> <p>The Partial Review of the Local Plan seeks to change six policies only and will not affect the remaining adopted Local Plan policies including site allocation NE4 (Metropolitan Police Workshop). At this time, there has been no identified need to review Site Allocation NE4 which was found to be sound and subsequently adopted in July 2023 with the comments being made consistent with those made prior to its adoption.</p> <p>The comments made may be relevant were a planning application received in the future for the site and can be taken into account in any subsequent review of the Wandsworth Local Plan affecting Site Allocation NE4.</p> <p>The development of the Infrastructure Delivery Plan is a separate process to the preparation of the Local Plan and the Council will continue to engage positively</p>

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						<p>infrastructure at the Borough level.</p> <p>Site Allocation NE4 Metropolitan Police Workshop, Ponton Road, SW8</p> <p>Whilst it is acknowledged the partial Local Plan review is not consulting on the Site Allocations contained within the adopted Local Plan, the MPS wish to reiterate the points made within previously representations submitted to the now adopted Local Plan objecting to the Ponton Road site allocation. The objection to the allocation is summarised below. The Metropolitan Police Service (MPS) made representations to Site Allocation NE4 in previous drafts of the plan, including on 3rd February 2022, in respect of the Regulation 19 Local Plan consultation, and 1st March 2021, in respect of the Regulation 18 Local Plan consultation. Those representations remain to be addressed within the adopted Local Plan.</p> <p>The site is owned by the Mayor's Office for Policing And Crime (MOPAC) and operated by the MPS as a workshop facility. The MPS is reviewing its current Estate Strategy including on-going disposals. It appears likely that the site is likely to be retained for operational use. The MPS are therefore keen to ensure that surrounding allocations will not have detrimental impacts on the security and operation of the MPS facility.</p> <p>In the unlikely event that the site were disposed of and redeveloped, the work carried out by MPS to date suggests that the proposed allocation would make redevelopment challenging. Complexities included a triangular site, the school requirement, height limitations and proposals for a public footpath through the site.</p> <p>The Infrastructure Delivery Plan, which was adopted in October 2024, has a section at page 23 regarding primary school requirements, indicating that the need or otherwise to allocate for a school use at this site is unclear. The demand is not certain at this stage and another site exists. In this context, it appears unreasonable to burden an operational MPS site with such an allocation.</p> <p>Summary The MPS require Section 106 charges to support policing at the Borough level to meet anticipated growth in the Borough and request that this is acknowledged within the draft Local Plan document. Additionally, we ask that the MPS' objection to Site Allocation NE4 within the adopted Local Plan is acknowledged in this consultation and any subsequent consultations.</p>		with the Metropolitan Police Service to ensure its infrastructure needs are accounted for in updates to that Infrastructure Delivery Plan.	

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11	Daniel True	General					<p>To whom it may concern,</p> <p>I voted for Labour locally and nationally because housing is the biggest challenge this country faces.</p> <p>To solve this issue, we need to build as much housing as possible, as quickly as possible. Housing becomes more affordable the more we build and the fewer we sell to foreign owners.</p> <p>Your only contribution should be to make sure the housing is dense, but also aesthetically pleasing/sympathetic to the local surroundings. There is no such thing as affordable housing, if we had built enough homes over the last 70 years all housing would be affordable, anything else you legislate is a tax.</p>		Comments Noted.
12	Lukas Chalupa	General					<p>I believe the policy more broadly will have a negative effect on the national house-building efforts and will further disintegrate already hesitant and slow developers from building within Wandsworth.</p> <p>Therefore, as Wandsworth resident myself I do not agree with the proposals.</p> <p>The council's primary focus should be to allow as many reasonable developments as possible without endless additional requirements that stifle the efforts further. Ultimately, affordability will be achieved through abundant supply as has been the case across the world in Austin, Texas or New Zealand.</p>		<p>Comments Noted.</p> <p>The Whole Plan Viability Assessment and Housing Background Paper (2025) provide justification on the policy approaches to ensure they provide the appropriate balance between meeting needs and being deliverable. The Council's policies have been designed to ensure they will be deliverable in the context of viability on a majority of likely development sites and contain measures that mean developments which cannot afford to meet the requirements of the policy can still achieve planning permission. The Council's strong housing supply position provides sufficient flexibility that even were the higher level of affordable housing being required from individual sites to result in a small reduction in housing supply, the Local Plan's overall housing requirement can still be achieved.</p>
13	Paul Griffiths	General	N	N	N	Justified, Effective, Consistent with national policy	<p>We don't need "affordable" housing. We need social housing. The old styled council homes, that cannot be sold to family. This is the whole problem and why I did not vote for Labour. Why are you so afraid of the words social housing? Affordable is not social. It's something completely different and it makes a mockery of the housing situation.</p> <p>Affordable homes just makes more money for the greedy landlords or for selling the houses. We need houses for rent, today, more than ever.</p>		Comments Noted. The Council's proposed policies clearly prioritise social housing as the priority tenure of affordable housing to be delivered. Other forms of affordable housing are allowed for in the Council's proposed policies, consistent with the London Plan and national policy.
14	Paul Griffiths	General					<p>The amount of money Wandsworth Council are paying in Housing Benefits to wealthy landlords is obscene. Surely by building or buying more social homes, these capital costs would make more financial sense, for the future. This problem is only going to get worse. The higher the house prices go, the greater the need for rented social homes will be. New "affordable " homes are not what we need, with rents from £2000 per month. We need social housing for individuals and families. I've been on the housing list for 10 YEARS and still have over 1,000 people waiting ahead of me. I'm 51, so how many more years need I wait? Over the past 10 years, Wandsworth Council has paid over [personal data] to my private landlord for a one bedroomed old council flat. You could have bought the property back then for the same price. Now my property is worth over [personal data]. In another 10 years, who knows how much it will be worth. Please use your common sense and realise what's happening in the world.</p>		Comments Noted.

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15	Andrea Franzel	General					<p>Hi</p> <p>I'm Chair of Chancery Building Embassy Gardens Residents Association which I founded 10 years ago.</p> <p>It's the 98 apartments shared-ownership Embassy Gardens Peabody building.</p> <p>My take on shared ownership is that people deciding to join the scheme are not treated fairly when it comes to pick their flat. Constructions companies take advantage of the fact that buyers don't have better options and so they either seclude all apartments in a building apart creating the stigma of "social housing" residents (it's the case of my building) or they select apartments from the ones available so that they are indistinguishable but they select the apartment hard to be sold (first floors apartments, or apartments facing a noisy railway or roundabout).</p> <p>I believe shared-ownership flats within the ones available should be randomly selected via a draw so that they are indistinguishable and also not necessary they ones less appealing.</p> <p>At the same time private flats and shared ownership flats should have the same management company and should have same access to any facility and pay the same service charge fees.</p> <p>This is just some of the many things that can be addressed by a local council without needed a change in legislation.</p> <p>Hope it helps.</p>		<p>Comment noted.</p> <p>In relation to shared ownership housing, the recommendations although reasonable would not be possible to implement due to the nature of how shared ownership homes are purchased and managed by affordable housing providers. Shared ownership homes are typically purchased by an affordable housing provider on a site which means the homes that are shared ownership and the homes that are open market have already been agreed very early in the planning process. This means these dwellings cannot typically be interchanged between open market and shared ownership at a later date as these will have been agreed in the legal agreements as part of planning permission. This also often means that the dwellings owned by the affordable housing provider and the open market homes are managed by a different company. In relation to service charges, it is often different as sometimes the open market homes and affordable homes have access to different spaces. For example open market dwellings may have car parking spaces, which would incur additional service/maintenance charges, it would be inappropriate for the affordable homes to pay for the maintenance of the car parking spaces if they cannot use these. These reasons often mean service charging need to be different for open market and the affordable dwellings.</p> <p>Within Local Plan policy, there is already a requirement for open market and affordable homes to be externally indistinguishable, however, affordable housing providers generally require developers to build out the affordable homes to a standard that is easier for them to maintain, for example, not including custom items such as bathroom/kitchen/flooring fixtures and fittings in the dwellings and circulation spaces that could be very costly or difficult to replace/maintain in the long term. This can sometimes result in disparities between the internal fit out of the affordable dwelling and circulation spaces accessing the affordable dwellings. This is due to the affordable housing providers wanting to ensure long term service charge and maintenance costs are kept to reasonable levels for existing and future occupiers, and the replacement of specialist and/or custom fixtures and fittings could significantly impact on longer term maintenance costs for homeowners. The standard of internal fit out will typically not be within the scope of Local Plan policies to address.</p>
16	Barry Cotter	General					<p>This is among the worst policy ideas I have ever heard and will hopefully be soundly defeated. Build so much housing that the quantity meaningfully makes Wandsworth more affordable. Don't tax market rate housing to subsidise the housing of the less well off. Build so much housing the less well off can afford market rate housing.</p>		<p>Comment Noted.</p>

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17	Richard Swaab	General					<p>Dear Sir,</p> <p>Just a short note to outline my support for the new plan.</p> <p>High time that we committed to more affordable housing for the borough.</p> <p>I hope the plan passes without delay.</p>		Support Noted.
18	Southwark Council	General					<p>Good Afternoon Christine,</p> <p>Hope you're well.</p> <p>Thank you for reaching out to Southwark Council with regards to the consultation on the Wandsworth Local Plan Partial Review.</p> <p>I can confirm that Southwark Council have reviewed the associated consultation documents in question and we do not propose any comments.</p> <p>If there is, however, anything else that you need from us then please do not hesitate to ask.</p> <p>Best regards, Planning Policy Team</p>		Comment Noted.
19	<p>John Turner obo Ballymore Group</p> <p>[See also Row 49, 143, 159, 174 and 177]</p>	General					<p>For the attention of the Planning Policy Team</p> <p>Dear Sir / Madam</p> <p>Regulation 19 Consultation on the LB Wandsworth Local Plan Partial Review Representations on Behalf of the Ballymore Group</p> <p>We write to make representations on the London Borough of Wandsworth's Local Plan Review – Regulation 19 Version. These comments seek to build on the substantial engagement between the Council and Ballymore during the previous consultation events for the recently adopted Wandsworth Local Plan (July 2023) as well as the comments provided on the Regulation 19 Consultation of the Plan in late 2023.</p> <p>You may be aware; Ballymore has significant development landholdings within the Borough. Ballymore is nearing completion of the Embassy Garden Scheme in Nine Elms which once completed will deliver up to 1,750 residential units and circa 45,000 sqm of commercial and retail space. We also have other land holdings and options within the area with the potential future development.</p> <p>Executive Summary and Key Points</p>		Comments Noted. Please see Row ID 49, 143, 159, 174 and 177 for responses to individual comments.

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							<p>Ballymore is understandably keen to ensure that existing and emerging planning policy does not set out any potentially unreasonable or inappropriate barriers to new development on their sites coming forward. This early engagement on the emerging New Local Plan Partial review is a key aspect of ensuring that their sites are deliverable and can come forward quickly to assist the Councils housing supply.</p> <p>To this end, while we support the Council's ambitions to deliver more homes and more affordable homes for its residents and the ethos behind many of the draft revised policies, we have concerns regarding a number of policy approaches set out in the Reg 19 Version of the Local Plan Partial Review and the clear impact these can have on the deliverability of development and specifically site allocations. We are however concerned regarding a perceived lack of recognition of the challenges facing the development industry.</p> <p>Wandsworth Local Plan</p> <p>LB Wandsworth is seeking an ambitious housing target of 1,950 per annum over a 15yr period up to 2038 which is to be commended. However, in achieving this the deliverability of allocated sites and windfall development will be a key issue in seeking to achieve this ambitious target, driven by affordable housing and viability.</p> <p>In our view, there is a risk that proposed amendments to planning policy in the new Local Plan, notably the requirement for 50% affordable housing on site at a tenure split of 70% (low-cost) social rented homes and 30% intermediate will negatively impact upon the viability of new development and impact upon housing delivery. In turn, this would work against the Council's ambition to increase the delivery of affordable housing.</p> <p>The National Planning Policy Framework (2024)</p> <p>On 12th of December 2024 the Ministry of Housing, Communities and Local Government (MHCLG) issued the National Planning Policy Framework ("NPPF") following consultation during early summer 2024. Alongside the new NPPF, they also published the Outcome of the New Standard Method providing updated indicative housing need figures for London and the results of the latest Housing Delivery Test (2023).</p> <p>The NPPF follows the Labour Party Manifesto pledges to undo the "damaging Conservative changes", restore mandatory housing targets and to reform and strengthen the presumption in favour of sustainable development.</p> <p>Paragraph 231 of the NPPF is clear that the policies contained within the Framework are material considerations which should be taken into account when dealing with planning applications from the day of its publication. Paragraph 80 also states that the Housing Delivery Test consequences will apply the day following the annual publication of the Housing Delivery Test results. As a result, both the new NPPF and the result of the Housing Delivery Test now apply to formulation and consideration of policy.</p>		

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						<p>The Presumption in Favour of Sustainable Development</p> <p>Paragraph 11 of NPPF continues to apply the presumption in favour of sustainable development. For decision taking this requires “development proposals that accord with an up-to-date plan” to be approved without delay; or “where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date, granting permission unless:</p> <ul style="list-style-type: none"> • i) the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for refusing the development proposed; or • ii) any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, • iii) when assessed against the policies in this Framework taken as a whole, having particular regard to key policies for directing development to sustainable locations, making effective use of land, securing well-designed places and providing affordable homes, individually or in combination.” The footnote (8) to Paragraph 11 clarifies that where the Government’s Housing Delivery Test indicates that the delivery of housing was substantially below (less than 75% of) the housing requirement of over the previous 3 years, the Local Plan policies will be considered out-of-date for the purposes of Paragraph 11. <p>Housing Supply, the Housing Delivery Test Outcome and Standard Methodology</p> <p>The Wandsworth Housing and Economic Land Availability Assessment (January 2022) identifies that the Council has sufficient land to meet its current targets of adopted Local Plan. The table below showing land availability across the plan period.</p> <table border="1"> <thead> <tr> <th>Site Size</th> <th>Years 1–5 (2023/24–2027/28)</th> <th>Years 1–10 (2023/24–2032/33)</th> <th>Years 1–15 (2023/24–2037/38)</th> </tr> </thead> <tbody> <tr> <td>Large Sites</td> <td>12,534</td> <td>17,486</td> <td>18,590</td> </tr> <tr> <td>Small Sites</td> <td>838</td> <td>938</td> <td>943</td> </tr> <tr> <td>Small Sites Windfall</td> <td>935</td> <td>2,778</td> <td>4,848</td> </tr> <tr> <td>Total</td> <td>14,307</td> <td>21,202</td> <td>24,381</td> </tr> </tbody> </table> <p>In addition, the results of the Government’s Housing Delivery Test 2023 were published by the MHCLG on 12th December 2024. The results confirm the London Borough of Wandsworth (‘LBW’) has delivered 5,745 homes between 20/21 and 22/23 against a target of 5,115 – equating to 112% of the number of homes required.</p> <p>However, the new NPPF confirms that the revision to the new Standard Method has been adopted and that this will be central to ensuring the Government’s stated objective of delivering 1.5 million homes in the next five years will be met. In association with the</p> 	Site Size	Years 1–5 (2023/24–2027/28)	Years 1–10 (2023/24–2032/33)	Years 1–15 (2023/24–2037/38)	Large Sites	12,534	17,486	18,590	Small Sites	838	938	943	Small Sites Windfall	935	2,778	4,848	Total	14,307	21,202	24,381		
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							<p>NPPF, the MHCLG issued a spreadsheet setting out the outcome of applying the new Standard Method to Local Housing Need for each local authority.</p> <p>The outcome to the new Standard Method identifies that LBW should provide 4,383 new homes per annum to meet Local Housing Need. This is a significant increase of 2,433 homes per annum compared to the current London Plan Housing target for LBW (1,950 homes per annum) as set out in the LB Wandsworth Local Plan.</p> <p>In order to meet the Government's objectives, given the substantial increase in targets beyond the delivered position and beyond the current land supply, LBW will need to deliver as much housing as it can on all sites that come forward for development, but particularly from brownfield sites in highly sustainable locations.</p> <p>Ministerial Statement</p> <p>On 30th July 2024 Angela Rayner MP – Deputy Prime Minister and Secretary of State for Housing, Communities and Local Government in a Ministerial Statement to Parliament outlined the significant housing need across the Country with brownfield land being the starting point for where these homes should be located.</p> <p>Paragraph 6 of the NPPF identifies that other statements of government policy may be material when preparing plans or deciding applications, such as relevant Written Ministerial Statements. The Secretary of State notes in her Statement that:</p> <p>“We are in the middle of the most acute housing crisis in living memory. Home ownership is out of reach for too many; the shortage of houses drives high rents; and too many are left without access to a safe and secure home. That is why today I have set out reforms to fix the foundations of our housing and planning system – taking the tough choices needed to improve affordability, turbocharge growth and build the 1.5 million homes we have committed to deliver over the next five years... If we have targets that tell us how many homes we need to build, we next need to make sure we are building in the right places. The first port of call for development should be brownfield land, and we are proposing some changes today to support more brownfield development: being explicit in policy that the default answer to brownfield development should be yes”.</p> <p>At current delivery rates LBW will fail to deliver enough homes under the revised standard methodology as mentioned above.</p> <p>Main Commentary</p> <p>To summarise our comments on the wider plan, we have concerns that the aspirations of the Local Plan could be undeliverable in its current format and therefore unsound; notably in relation to Paragraph 32 of the NPPF.</p> <p>Furthermore, the recent changes to the NPPF places a greater emphasis on the delivery</p>		

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						<p>of new homes at a strategic level. This further reinforces the need for new planning policy to be rooted in delivery and enabling development as opposed to prescriptive requirements.</p> <p>With this in mind, we append to this letter the following comments on the draft Local Plan Partial Review Regulation 19 Consultation with a particular focus on the deliverability of the Council's Strategic Sites and meeting the planned housing target.</p> <p>In each instance we set out our comments in the standard response format for the specific policy matter raised.</p>			
20	<p>Emily Disken obo BlackRock UK Property Fund</p> <p>[See also Row 48]</p>	General				<p>Dear Sir/Madam,</p> <p>PUTNEY EXCHANGE, HIGH STREET, PUTNEY, LONDON, SW15 1TW CONSULTATION ON PARTIAL REVIEW OF WANDSWORTH'S LOCAL PLAN (2023-2038) (REGULATION 19)</p> <p>TOWN AND COUNTRY PLANNING (LOCAL PLANNING) (ENGLAND) REGULATION 2012</p> <p>We write on behalf of our client, BlackRock UK Property Fund, in response to the London Borough of Wandsworth's (hereafter referred to as 'LBW') Regulation 19 Consultation on the Partial Review of the Wandsworth Local Plan (20232038).</p> <p>The LBW Local Plan was adopted in July 2023 and sets out a 15-year strategic vision, objectives and the spatial strategy for the borough, as well as the planning policies and site allocations that will guide future development. The Local Plan looks ahead to 2038 and identifies where the main developments will take place and how places within the borough will change over that period.</p> <p>BACKGROUND AND CONTEXT TO THESE REPRESENTATIONS These representations are submitted on behalf of BlackRock UK Property Fund, who own Putney Exchange Shopping Centre (hereafter referred to as 'the Shopping Centre' / 'the Site').</p> <p>The Shopping Centre is centrally located within Putney on the west side of Putney High Street and the south side of Putney Bridge Road. It was built in the late 1980s and comprises retail and restaurant uses at ground and first floor levels, including the Waitrose Supermarket and associated car parking. The ownership also includes residential flats on the upper floors.</p> <p>Pedestrian access to the Shopping Centre is provided from both Putney High Street and Lacy Road. Vehicular access to the car park is provided via Lacy Road.</p>		Comments Noted. Please see Row ID 48 for responses to individual comments.	

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						<p>The character of the surrounding area in terms of land use is mixed, with predominantly retail and restaurant uses on the ground floor of Putney High Street, with residential and office use on upper floors. The Site includes six late Victorian terraced buildings on Lacy Road along the northern frontage.</p> <p>The Shopping Centre occupies a prominent location in the designated Putney Town Centre. The town centre designation is conducive to the optimisation of the Site which is currently predominantly in retail use, into a mixed-use development including residential and commercial uses. There is a clear incentive to redevelop the Site, to better serve the needs of the community and to bring forward a wider range of planning benefits expected of such a key town centre location.</p> <p>These representations are submitted as BlackRock UK Property Fund wishes to continue to invest in the Shopping Centre to lead the regeneration of Putney Town Centre. The wider benefits that could be delivered by any future redevelopment of the Site include:</p> <ul style="list-style-type: none"> • Delivering much-needed housing, including affordable homes; • Creating high-quality public realm to assist in local place-making and creating permeability through the Site; • Delivering buildings of a high architectural quality to improve the appearance and townscape function of the area; • Providing new areas of playspace which is currently lacking in the town centre; • Improving air quality through use of PVs and encouraging active travel; • Increasing urban greening and a net increase in biodiversity; • Delivering tangible economic benefits to the local area including job creation during construction and in the completed development; and • Providing a mix of uses which compliments and enhances the vitality of Putney Town Centre and stimulates the local economy. <p>Montagu Evans previously submitted representations to LBW's Regulation 18 consultation on the Local Plan Review on behalf of BlackRock UK Property Fund on 4 December 2023. We attach a copy of these representations at Appendix 1 for reference.</p> <p>Since the Regulation 18 consultation, LBW has published documents which form part of the Local Plan Partial Review evidence base, which are intended to give robust evidence of the development needs, pressures and issues within the borough. Of particular relevance to the redevelopment of the Site is the Whole Plan Viability Assessment (November 2024) which tests the ability of development typologies in Wandsworth to accommodate policies in the Local Plan Partial Review.</p> <p>Our client maintains its position as set out in the representations to LBW's Regulation 18 consultation. We provide additional commentary with reference to the documents comprising the evidence base below.</p>			

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							<p>THE IMPACT OF PROPOSED CHANGES ON THE DELIVERY OF HOUSING ACROSS THE BOROUGH</p> <p>At a national level, the Labour Government has committed to the delivery of 1.5 million homes within the next 5 years to address the housing crisis and support growth. Housing delivery is a key objective of the National Planning Policy Framework ('NPPF'), which advocates that a sufficient amount and variety of land should come forward to significantly boost the supply of housing (paragraph 61).</p> <p>The Site is located in an optimum town centre location and has the potential to make a significant contribution towards both national and local housing targets as part of any future redevelopment. However, market conditions including increased build costs, rising inflation and increased labour costs continue to pose challenges for the delivery of redevelopment schemes.</p> <p>On behalf of our client, we re-iterate the comments made in our previous representations in relation to scheme delivery, in that by striving for a policy-compliant level of affordable housing, other elements of a scheme may be comprised. A flexible approach to the application of other policies within the adopted Local Plan, particularly around the tall buildings policy, would likely be necessary. If a site does not fall within a tall buildings zone, which includes the Putney Exchange site, there would be no presumption in favour of tall buildings. Delivering an increased quantum of development through increased building heights may be required to bring forward viable and deliverable schemes if the revised affordable housing targets are adopted, and this should be acknowledged as part of the decision-making process.</p>		
21	Mandip Singh Sahota MRTPI obo NTA Planning LLP	General					<p>Consultation Response – Wandsworth Local Plan Partial Review (Regulation 19)</p> <p>Dear Spatial Planning Team,</p> <p>We appreciate the opportunity to comment on the Wandsworth Local Plan Partial Review and acknowledge the Council's commitment to delivering more genuinely affordable housing in the borough.</p> <p>However, we wish to express our concerns regarding the absence of any proposed revisions to the economic use policies, particularly those relating to Strategic Industrial Locations (SIL), Locally Significant Industrial Sites (LSIS/LSIA), and other industrial land allocations, where there are considerable opportunities to contribute towards the delivery of new homes.</p> <p>The Wandsworth Housing Needs Assessment (December 2024) provides strong evidence of the borough's significant shortfall in genuinely affordable housing, particularly social rented units. The assessment identifies that between 14,600 and 23,600 affordable homes</p>	<p>To ensure that Wandsworth maximises the potential of its industrial land while meeting both economic and housing needs, we propose the following policy amendments:</p> <ul style="list-style-type: none"> • Explicitly incorporate co-location principles within the Local Plan, defining LSIS areas where industrial intensification and residential use can be pursued together. • Commit to a strategic review of industrial land use as part of the wider Local Plan process, identifying underutilised or outdated industrial sites that could be better optimised. • Introduce site-specific guidance or area action plans for key LSIS locations where industrial and residential uses can be successfully integrated. 	<p>Comments Noted.</p> <p>The Partial Review of the Local Plan seeks to review six policies in total, consistent with the objectives of the Partial Review published at the Regulation 18 stage. The Wandsworth Local Plan (2023-2038) sets out effective policies to address Strategic Industrial Locations and Locally Significant Industrial Sites. These policies, in the context of the Local Plan as a whole, seek to balance the need to retain sufficient strategic and significant industrial land to provide employment, with the need to meet the Borough's housing needs. The Wandsworth Local Plan (2023-2038) sets out a strategy to meet the Borough's housing requirement and the Council has not been identified a need to review these policies further to the versions found to be sound and subsequently adopted in July 2023. The Council will continue to monitor these policies and bring forward proposals for their review where a need arises in the future.</p>

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						<p>are needed by 2038, comprising up to 90% of the total projected housing need. Additionally, the report highlights that over 70% of all affordable housing need is for social rented accommodation, reinforcing the urgency to increase delivery through all available mechanisms.</p> <p>The Local Plan Partial Review, while addressing housing policies, does not consider how collocating residential with industrial uses could contribute to this target. Industrial sites, particularly within LSIS areas, present an opportunity to integrate employment-generating spaces with new housing developments, reducing land pressure while enhancing housing supply. The Housing Needs Assessment emphasises that housing pressures in Wandsworth are not solely a matter of affordability but also availability, meaning that creative land use strategies are essential.</p> <p>To meet the ambitious 50% affordable housing target set by the Council, it is imperative that industrial land policies align with this objective. Failing to update LSIS and SIL policies to allow for co-location limits the borough's capacity to deliver much-needed affordable housing while maintaining employment spaces.</p> <p>The report highlights a significant viability challenge in delivering social rent housing. Small sites could contribute significantly to affordable housing supply. The Council is also noted to be considering the disposal of Council-owned land to facilitate affordable housing but must ensure value for money. Consideration of other viable alternatives should be considered at this juncture.</p> <p>Need for a More Proactive Approach to Industrial Land Use</p> <p>While the housing policies have been updated to address affordability and supply issues, the Local Plan Partial Review does not take a more dynamic approach to optimising industrial land use. The policies, as currently drafted, continue to reference London Plan Policy E7 without considering how Wandsworth could take a more proactive stance in facilitating the collocation of industrial and residential uses where appropriate, making a more substantial offering towards the delivery of affordable housing.</p> <p>London Plan 2021 Policy E7 explicitly allows for intensification and consolidation of industrial land to support the delivery of residential and other uses, such as social infrastructure, particularly in LSIS areas. However, the Local Plan Partial Review does not introduce any complementary policies or mechanisms to encourage this approach at a borough level. Given the pressing need for both employment space and housing, and the clear viability concerns of delivery, Wandsworth should ensure that industrial land, which is often more affordable, and therefore deliverable, is used in the most efficient and sustainable manner, rather than maintaining a rigid separation between industrial and residential uses.</p>			

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							<p>Potential for Co-Location and Masterplanning</p> <p>London Plan Policy E7 provides a clear framework for enabling co-location where:</p> <ul style="list-style-type: none"> • Industrial activities are not compromised in terms of operational efficiency. • Industrial intensification is completed before residential occupation. • Appropriate mitigation measures are put in place to safeguard residential amenity while maintaining industrial functions. <p>To this end, we urge the Council to better strategies to develop a plan-led approach that identifies opportunities for intensification and consolidation of SIL and LSIS sites. This could include:</p> <ul style="list-style-type: none"> • Identifying LSIS locations suitable for co-location as part of a masterplanning process, ensuring that industrial and residential uses can exist harmoniously. • Encouraging mixed-use development where industrial activities can be retained while introducing complementary residential and social infrastructure elements. • Exploring innovative industrial formats, such as multi-level industrial space or stacked logistics solutions, to accommodate employment needs alongside new housing. • Setting specific thresholds for affordable housing delivery in the above locations. <p>Policy Recommendations</p> <p>To ensure that Wandsworth maximises the potential of its industrial land while meeting both economic and housing needs, we propose the following policy amendments:</p> <ul style="list-style-type: none"> • Explicitly incorporate co-location principles within the Local Plan, defining LSIS areas where industrial intensification and residential use can be pursued together. • Commit to a strategic review of industrial land use as part of the wider Local Plan process, identifying underutilised or outdated industrial sites that could be better optimised. • Introduce site-specific guidance or area action plans for key LSIS locations where industrial and residential uses can be successfully integrated. <p>Conclusion</p> <p>While we support the Council's ambition to deliver more affordable housing, we believe that a more forward-thinking approach to industrial land use would enhance Wandsworth's ability to meet both housing and employment objectives. The findings of the Housing Needs Assessment (2024) provide clear justification for integrating housing and industrial strategies to maximise land efficiency and urgently increase the delivery of social rented housing.</p> <p>We encourage the Council to take a more flexible stance on LSIS and SIL land to support the best and most effective use of land in the borough, ensuring that all available land assets contribute to meeting local housing needs.</p> <p>We look forward to further engagement on this matter and welcome discussions on how</p>		

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							industrial intensification and co-location could be effectively incorporated into the Local Plan.		
22	George Pavli	General					<p>Dear Wandsworth</p> <p>I refer to the recent article about building more social housing. Please note all social housing that is now being built should be for renting only. No option to buy and Wandsworth Borough needs to continually every year increase the number of homes it owns , controls. The Borough has a good opportunity to achieve this to make sure these homes are used by Blue Collar workers and decent local residents who may be deserving etc. Wandsworth , as a location offers a lot to individuals and both future Blue and Red councils need to keep this momentum going.</p>	Comments Noted	
23	Mark Mildred	General					<p>I am writing to express strong support for the proposals for increased social housing to be provided out of presently ongoing and future developments.</p> <p>Wandsworth diminished its public housing stock to a highly detrimental degree by aggressive marketing and excessive discounts. Whilst this may have been consonant with the pro-home ownership philosophy of the time it is beyond argument that it has left the Borough with grossly inadequate stock.</p> <p>Much more social housing is required to meet the needs of key workers for the majority of whom conventional home ownership is an impossible dream. It is also needed to provide mixed communities thus avoiding the Borough becoming a homogeneous area for young professionals and City workers.</p>	Support Noted.	
24	Sarah Rackham	General					<p>I have read the proposals for a more proactive and effective approach to developing a better housing strategy for Wandsworth .</p> <p>I found the simple read format particularly helpful and accessible.</p> <p>As a life long (75 years) resident in the borough and community worker I am acutely aware of the increasing housing crisis and inequality locally.</p> <p>Homelessness, overcrowding, unaffordable decent rented accommodation not to mention existing social and council stock in desperate need of repairs is a shameful and unacceptable part of life for too many people in our borough.</p> <p>The 6 proposals set in out in the consultation are all extremely important.</p> <p>It is clear that an immense amount of constructive thinking and detailed legal research is the background to this paper.</p> <p>I support all aspects of it and welcome the leadership and determination behind this.</p> <p>Clearly councillors and officers have worked very hard to reach this stage.</p> <p>I respect and appreciate the bold and progressive position and see this as an excellent basis to tackle and improve housing for all those in housing need.</p> <p>This should help Wandsworth to become a less divided and unequal community to the benefit of all.</p> <p>Thank you for giving me the opportunity to comment.</p>	Support Noted.	

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25	Chris Smith	General					<p>Dear Planning Policy team</p> <p>I am writing to indicate my strong support for the Wandsworth new Local Plan. We are in a housing crisis and all councils must do far more to deliver the social housing our families need</p> <p>Please keep me informed as to the next stages</p>		Support Noted.
26	<p>Andrew Catto obo the Putney Society</p> <p>[See also Row 110, 137, 154, 168, 187 and 196]</p>	General					<p>Local Plan 'Partial Review' 2025. Policies LP23 – LP31</p> <p>Putney Society Comments</p> <p>The Putney Society have considered the proposed changes to these policies. We comment:</p> <p>It is symptomatic of how over lengthy, and commensurately vague, the local plan has become that suggested changes to just six policies (out of over 70) fill a 25 page document. We suggest the biblical 10 commandments as a role model. The new text after 17.2, for example, contains no policy.</p> <p>Why does this need to be added?</p>		<p>Comments Noted. The Council's proposed policies have been prepared to address the objectives of the Local Plan and its Partial Review, as informed by evidence. Wider changes to supporting and other text have been identified for consistency or clarity. Had the Council not proposed these changes, text within the Local Plan may have become inconsistent or otherwise unclear, leading to its misinterpretation or misunderstanding.</p>

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27	Nigel Walkden obo National Highways	General					<p>For the Attention of: Christine Cook (Wandsworth Council)</p> <p>Consultation: REGULATION 19 CONSULTATION ON WANDSWORTH LOCAL PLAN PARTIAL REVIEW (PUBLICATION VERSION)</p> <p>National Highways Ref: NH/25/9513</p> <p>Thank you for your email inviting National Highways to comment on the above consultation and indicating that a response is required by 24 February 2025.</p> <p>National Highways was appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to this consultation, our principal interest is safeguarding the operation of the M4 that is located to the northwest of Wandsworth in the London Borough of Hounslow. This is some distance away from Wandsworth, approximately 3.5km from the administrative area to the easternmost section of the motorway.</p> <p>The consultation is seeking views on updates to the following policies</p> <ul style="list-style-type: none"> • Policy LP23: Affordable Housing • Policy LP24: Housing Mix • Policy LP28: Purpose-Built Student Accommodation • Policy LP29: Housing with Shared Facilities • Policy LP30: Build to Rent • Policy LP31: Specialist Housing for Vulnerable People and for Older People <p>We have examined the proposed changes in the partial review and are content that they will have no implications for the M4, particularly due to the distance from the motorway and the neutral effect of the policies on vehicular trip generation. We have no further comments to make in respect of this consultation.</p> <p>We look forward to continuing to participate in future consultations and discussions. In the meantime, if you have any questions with regards to the comments made in this response, please do not hesitate to contact us at planningse@nationalhighways.co.uk</p>		Comments Noted.

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28	Sue Wixley obo Wandsworth Liberal Democrats	General					<p>The Local Plan Partial Review is not justified because it fails to provide an adequate evidence base and plan for the infrastructure required to support thousands of new homes. Specifically:</p> <ol style="list-style-type: none"> 1. Healthcare Infrastructure: The plan does not adequately justify how local GP surgeries, already at capacity with waiting times exceeding 3-4 weeks in some areas, will accommodate thousands of additional residents. There is no assessment of current healthcare capacity gaps or specific plans for new medical facilities. 2. Transport Infrastructure: The plan lacks justified provisions for expanding transport capacity in areas targeted for high-density housing. With Underground, train and bus services already overcrowded during peak hours, the absence of transport improvement plans makes the housing proposals unjustified. 3. Educational Facilities: Despite projections showing population growth, the plan contains insufficient justification for how school places will be provided. Many popular local primary schools are already oversubscribed, and the plan fails to demonstrate how educational needs of new residents will be met. 4. Open and Green Spaces: The plan does not justify the absence of additional green space requirements where new housing will increase population density, nor does it detail the impact of reduced green space requirements. This ignores the evidence-based connection between access to open space and community wellbeing. 5. Community Facilities: There is no justified approach to ensuring community centres, libraries, and local shops will be delivered alongside housing developments, despite evidence from existing developments showing these are essential for creating sustainable communities. <p>The plan therefore fails to take reasonable account of the infrastructure needs that are essential companions to new housing development, making the current approach unjustified when considering the evidence available from both existing developments in Wandsworth and comparable housing schemes elsewhere.</p> <p>The Local Plan Partial Review is also inconsistent with national policy. The Revised National Planning Policy Framework requires "[s]trategic policies [to] make sufficient provision for...infrastructure for transport...community facilities (such as health, education and cultural infrastructure)...". However, the Partial Review fails to assess additional capacity requirements for local infrastructure or plan for its provision.</p> <p>Take account of the infrastructure needed alongside new housing development, for example in section 3 of the Local Plan, Placemaking.</p>	Take account of the infrastructure needed alongside new housing development, for example in section 3 of the Local Plan, Placemaking	<p>Comments Noted.</p> <p>The Partial Review of the Local Plan seeks to review six policies in total, consistent with the objectives of the Partial Review published at the Regulation 18 stage. The adopted Wandsworth Local Plan (2023-2038) sets out policies to address the infrastructure requirements associated with local development, which the Council continues to monitor through updates to its Infrastructure Delivery Plan. The Council has not been identified a need to review policies relating to local infrastructure further to the versions found to be sound and subsequently adopted in July 2023. The policies that are subject to the Partial Review relate to managing the types of housing that are expected to come forward but not directly the amount or location. As such, there are not expected to be any direct implications of the Council's proposed policies on infrastructure that would require wider changes to the adopted Local Plan. The Council will continue to monitor these policies and bring forward proposals for their review where a need arises in the future.</p>
29	Madeleine Riddell	General					I am writing to support the changes detailed in the Local Plan Partial Review because of the need for more social housing in the borough. The despair and hopelessness which local people feel about overcrowding or the simple impossibility of their children being able to afford private rents or find social housing is terrible and we need urgent action, as set out in this Local Plan Partial Review, to start to address this issue		Support Noted.

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30	Dr Simon Sandberg	General					<p>Dear Sir/Madam</p> <p>This looks like a commendably ambitious plan to meet the acute affordable housing crisis existing in Wandsworth (and of course elsewhere). Having worked for Local Authority Housing Departments before I retired, I am conscious of the scale of the problems faced by those earning low or even no wages and thus support the objectives set out in these documents. I wish you every success in negotiating with developers.</p>		Support Noted.
31	Brendan Conway	General					<p>Community Led Housing and the Wandsworth Plan</p> <p>Dear Wandsworth Council,</p> <p>We welcome the opportunity to respond to the Regulation 19 Consultation on the Local Plan Partial Review. This submission advocates for the inclusion and support of Community Led Housing (CLH) as a vital tool for addressing the borough's housing challenges and achieving sustainable development goals.</p> <p>The Case for Community Led Housing</p> <p>Community Led Housing offers a unique approach to meeting housing needs while fostering social cohesion and local engagement. By enabling communities to have a leading role in the development, management, and ownership of housing, CLH provides solutions tailored to specific local demands and enjoys high levels of local support.</p> <p>As Victoria Hills MRTPI FICE, Chief Executive of the Royal Town Planning Institute, emphasises,</p> <p>"Community led schemes add diversity to the housing market, engage communities in the design and location of new housing, and help overcome local opposition to development."</p> <p>CLH is no longer a niche concept. Across the UK, more than 15,000 homes are in the pipeline, supported by over 87,000 members of CLH groups. This growing movement requires planners to adapt policies and practices to unlock its full potential.</p> <p>Alignment with the Wandsworth Plan and National Policy</p> <p>The Wandsworth Local Plan Issues Document (2018) recognises the need for specialised housing to meet the diverse needs of vulnerable groups, families, and those wishing to commission or build their own homes. CLH falls squarely within this category, offering tailored housing solutions that align with the following key policy goals:</p> <p>1. Sustainable Development CLH directly supports Wandsworth Council's commitment to promoting sustainable</p>	<p>To integrate CLH into the Wandsworth Local Plan, we propose the following measures:</p> <ol style="list-style-type: none"> 1. Adopt a Definition of Community Led Housing Incorporate the widely accepted definition of CLH, which includes meaningful community engagement, community ownership or stewardship, and legally protected benefits for the community in perpetuity. 2. Develop a Community-Led Development Supplementary Planning Document (SPD) Create a dedicated SPD to provide detailed guidance on enabling CLH. This document should address: <ul style="list-style-type: none"> o Policy support for CLH as a form of Self and Custom Build housing. o Mechanisms for identifying and unlocking small sites suitable for CLH. o Guidance on planning obligations and viability assessments tailored to CLH schemes. 3. Collaborate with the London Community Led Housing Hub Leverage the expertise and resources of the London CLH Hub to co-produce policies, build local capacity, and support the delivery of CLH projects. 4. Encourage Diverse Housing Models Recognise and support the range of CLH approaches, including cohousing, Community Land Trusts (CLTs), housing cooperatives, and self-help housing. Benefits of Community Led Housing for Wandsworth 	<p>Comments Noted.</p> <p>The Partial Review of the Local Plan seeks to review six policies in total, consistent with the objectives of the Partial Review published at the Regulation 18 stages. The Wandsworth Local Plan (2023-2038) includes policies which encourage community-led development including Policy SDS1. The Council has not been identified a need to review policies relating to community-led development further to the versions found to be sound and subsequently adopted in July 2023. The Council will continue to monitor these policies and bring forward proposals for their review where a need arises in the future.</p>

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						<p>development, particularly in the context of the climate emergency. The collaborative, community-driven nature of CLH fosters local resilience and environmental stewardship.</p> <p>2. Meeting Housing Needs CLH responds to NPPF Paragraphs 59 and 61 by addressing the specific housing needs of diverse groups, including families, older people, and those seeking affordable housing.</p> <p>3. Community Engagement Early community engagement, as highlighted in NPPF Paragraph 39, is a core principle of CLH. This approach facilitates collaboration between planners, developers, and residents, leading to more efficient planning processes and better outcomes for the community.</p> <p>4. Supporting Self and Custom Build Housing The Housing Act 2016 places a statutory duty on local authorities to support self and custombuild housing. CLH provides an effective mechanism for fulfilling this requirement while ensuring long-term community benefit.</p> <p>The Role of Community Led Housing in the London Plan</p> <p>The London Plan emphasises “Good Growth” and inclusive communities. Policies GG1 (Building strong and inclusive communities) and GG4 (Delivering the homes that Londoners need) highlight the importance of housing delivery models that build social value and support diverse housing needs.</p> <p>The Mayor of London’s Housing Strategy acknowledges the challenges faced by CLH groups, including access to land, finance, and expertise. However, the strategy also provides support through initiatives such as the Innovation Fund, the London Community Housing Fund, and the Community Led Housing Hub. We urge Wandsworth Council to actively engage with these resources to enable the delivery of CLH projects.</p> <p>Policy Recommendations</p> <p>To integrate CLH into the Wandsworth Local Plan, we propose the following measures:</p> <p>1. Adopt a Definition of Community Led Housing</p> <p>Incorporate the widely accepted definition of CLH, which includes meaningful community engagement, community ownership or stewardship, and legally protected benefits for the community in perpetuity.</p> <p>2. Develop a Community-Led Development Supplementary Planning Document (SPD) Create a dedicated SPD to provide detailed guidance on enabling CLH. This document should address:</p> <ul style="list-style-type: none"> o Policy support for CLH as a form of Self and Custom Build housing. 	<p>Community Led Housing delivers significant social, economic, and environmental benefits, including:</p> <ul style="list-style-type: none"> · Affordable Housing: CLH provides genuinely affordable homes tailored to local needs, often without being subject to Right to Buy. · Community Cohesion: CLH fosters stronger, more resilient communities through collaborative development processes. · Economic Inclusion: CLH creates training and employment opportunities, empowering vulnerable groups and building local skills. · Sustainability: The community-driven nature of CLH promotes long-term stewardship and environmentally responsible development. <p>Community Led Housing represents a transformative opportunity for Wandsworth to address its housing challenges in a way that promotes sustainability, inclusivity, and community empowerment.</p> <p>By embedding CLH into the Local Plan and engaging with the London CLH Hub, the Council can unlock the potential of this innovative housing model to deliver lasting benefits for its residents.</p> <p>In conclusion, we strongly encourage Wandsworth Council to act in alignment with its stated aim to “put communities at the heart of decision making.”</p>		

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						<p>o Mechanisms for identifying and unlocking small sites suitable for CLH.</p> <p>o Guidance on planning obligations and viability assessments tailored to CLH schemes.</p> <p>3. Collaborate with the London Community Led Housing Hub Leverage the expertise and resources of the London CLH Hub to co-produce policies, build local capacity, and support the delivery of CLH projects.</p> <p>4. Encourage Diverse Housing Models</p> <p>Recognise and support the range of CLH approaches, including cohousing, Community Land Trusts (CLTs), housing cooperatives, and self-help housing.</p> <p>Benefits of Community Led Housing for Wandsworth</p> <p>Community Led Housing delivers significant social, economic, and environmental benefits, including:</p> <ul style="list-style-type: none"> · Affordable Housing: CLH provides genuinely affordable homes tailored to local needs, often without being subject to Right to Buy. · Community Cohesion: CLH fosters stronger, more resilient communities through collaborative development processes. · Economic Inclusion: CLH creates training and employment opportunities, empowering vulnerable groups and building local skills. · Sustainability: The community-driven nature of CLH promotes long-term stewardship and environmentally responsible development. <p>Community Led Housing represents a transformative opportunity for Wandsworth to address its housing challenges in a way that promotes sustainability, inclusivity, and community empowerment.</p> <p>By embedding CLH into the Local Plan and engaging with the London CLH Hub, the Council can unlock the potential of this innovative housing model to deliver lasting benefits for its residents.</p> <p>In conclusion, we strongly encourage Wandsworth Council to act in alignment with its stated aim to “put communities at the heart of decision making.”</p>			
32	Steven Heywood obo London Borough of Lambeth	General			Y	<p>The London Borough of Lambeth welcomes the opportunity to respond to the Wandsworth Local Plan Partial Review. The two boroughs have worked closely together in recent years to discuss common strategic matters and prepare Statements of Common Ground, in line with the Duty to Cooperate, and are jointly committed to delivering more affordable housing in the Vauxhall, Nine Elms and Battersea Opportunity Area. We look forward to continuing this good working relationship as the Wandsworth Local Plan progresses and as we begin to review our own Lambeth Local Plan. We support the aims of the revised policies in the consultation draft to better reflect identified housing need in the borough, and to increase affordable housing delivery on suitable sites throughout Wandsworth. We</p>		Support Noted.	

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							have no specific comments or changes to make on individual policies, and we do not think that the revised policies raise any strategic issues between the two boroughs.		
33	Michael Atkins obo Port of London Authority	General					<p>Apologies for delay in this response from the Port of London Authority (PLA) with regard to the London Borough of Wandsworth Regulation 19 consultation on the Partial review of the Local Plan, in relation to updating the following six policies:</p> <p>Policy LP23: Affordable Housing Policy LP24: Housing Mix Policy LP28: Purpose-Built Student Accommodation Policy LP29: Housing with Shared Facilities Policy LP30: Build to Rent Policy LP31: Specialist Housing for Vulnerable People and for Older People</p> <p>To confirm on review of the consultation documents the PLA has no comments to make on the proposed amendments.</p> <p>Furthermore, in terms of contact information. You can include me as the principal contact at the PLA for future consultations.</p>		Comments Noted.
34	Marie Cannie obo Marine Management Organisation	General					<p>Please find below the MMO standard response to the Wandsworth Local Plan Partial Review Reg 19 consultation.</p> <p>As we discussed at our meeting, given the specific focus of this review, there is limited strategic overlap with the south east marine plan policies with regard to housing in Wandsworth – except for those that impact the inter-tidal zone.</p> <p>We advise that you take note of any relevant policies within the South East Marine Plan documents in regard to areas within the Wandsworth Local Plan Partial Review area that may impact upon the marine environment. We recommend inclusion of the South East Marine Plan when discussing any themes with coastal or marine elements (including tidal area of the Thames River, or tidal extent of any river) and recommend that you follow a whole-plan approach when considering the marine plan policies, please see below for more detail.</p> <p>Consultation response - PLEASE READ</p> <p>Thank you for including the Marine Management Organisation (MMO) in your recent consultation submission. The MMO will review your document and respond to you directly should a bespoke response be required. If you do not receive a bespoke response from us within your deadline, please consider the following information as the MMO's formal response.</p> <p>Kind regards,</p> <p>The Marine Management Organisation</p>		Comments Noted.

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						<p>Marine Management Organisation Functions The MMO is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are: marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing grants.</p> <p>Marine Planning and Local Plan development Under delegation from the Secretary of State for Environment, Food and Rural Affairs (the marine planning authority), the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the Mean High Water Springs (MHWS) mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of MHWS, there will be an overlap with terrestrial plans, which generally extend to the Mean Low Water Springs (MLWS) mark. To work together in this overlap, the Department of Environment, Food and Rural Affairs (Defra) created the Coastal Concordat. This is a framework enabling decision-makers to co-ordinate processes for coastal development consents. It is designed to streamline the process where multiple consents are required from numerous decision-makers, thereby saving time and resources. Defra encourage coastal authorities to sign up as it provides a road map to simplify the process of consenting a development, which may require both a terrestrial planning consent and a marine licence. Furthermore, marine plans inform and guide decision-makers on development in marine and coastal areas.</p> <p>Under Section 58(3) of Marine and Coastal Access Act (MCAA) 2009 all public authorities making decisions capable of affecting the UK marine area (but which are not for authorisation or enforcement) must have regard to the relevant marine plan and the UK Marine Policy Statement. This includes local authorities developing planning documents for areas with a coastal influence. We advise that all marine plan objectives and policies are taken into consideration by local planning authorities when plan-making. It is important to note that individual marine plan policies do not work in isolation, and decision-makers should consider a whole-plan approach. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service: soundness self-assessment checklist. We have also produced a guidance note aimed at local authorities who wish to consider how local plans could have regard to marine plans. For any other information please contact your local marine planning officer. You can find their details on our gov.uk page.</p> <p>See this map on our website to locate the marine plan areas in England. For further information on how to apply the marine plans and the subsequent policies, please visit our Explore Marine Plans online digital service.</p> <p>The adoption of the North East, North West, South East, and South West Marine Plans in 2021 follows the adoption of the East Marine Plans in 2014 and the South Marine Plans in 2018. All marine plans for English waters are a material consideration for public authorities with decision-making functions and provide a framework for integrated plan-led management.</p>			

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						<p>Marine Licensing and consultation requests below MHWS</p> <p>Activities taking place below MHWS (which includes the tidal influence/limit of any river or estuary) may require a marine licence in accordance with the MCAA. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object. Activities between MHWS and MLWS may also require a local authority planning permission. Such permissions would need to be in accordance with the relevant marine plan under section 58(1) of the MCAA. Local authorities may wish to refer to our marine licensing guide for local planning authorities for more detailed information. We have produced a guidance note (worked example) on the decision-making process under S58(1) of MCAA, which decision-makers may find useful. The licensing team can be contacted at: marine.consents@marinemanagement.org.uk.</p> <p>Consultation requests for development above MHWS</p> <p>If you are requesting a consultee response from the MMO on a planning application, which your authority considers will affect the UK marine area, please consider the following points:</p> <ul style="list-style-type: none"> • The UK Marine Policy Statement and relevant marine plan are material considerations for decision-making, but Local Plans may be a more relevant consideration in certain circumstances. This is because a marine plan is not a 'development plan' under the Planning and Compulsory Purchase Act 2004. Local planning authorities will wish to consider this when determining whether a planning application above MHWS should be referred to the MMO for a consultee response. • It is for the relevant decision-maker to ensure s58 of MCAA has been considered as part of the decision-making process. If a public authority takes a decision under s58(1) of MCAA that is not in accordance with a marine plan, then the authority must state its reasons under s58(2) of the same Act. • If the MMO does not respond to specific consultation requests then please use the above guidance to assist in making a determination on any planning application. <p>Minerals and Waste Local Plans and Local Aggregate Assessments</p> <p>If you are consulting on a minerals and waste local plan or local aggregate assessment, the MMO recommends reference to marine aggregates, and to the documents below, to be included:</p> <ul style="list-style-type: none"> • The Marine Policy Statement (MPS), Section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK's) construction industry. • The National Planning Policy Framework (NPPF), which sets out policies for national (England) construction mineral supply. • The minerals planning practice guidance which includes specific references to the role of marine aggregates in the wider portfolio of supply. • The national and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period, including marine supply. <p>The minerals planning practice guidance requires local mineral planning authorities to prepare Local Aggregate Assessments. These assessments must consider the opportunities and constraints of all mineral supplies into their planning regions – including marine sources. This means that even land-locked counties may have to consider the role</p>			

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							that marine-sourced supplies (delivered by rail or river) have – particularly where land-based resources are becoming increasingly constrained.		
35	Ajit Gill obo The Environment Agency	General					My colleague George previously responded to the Local Plan Partial Review consultation (see attached). As the proposed changes to the Plan fall outside of our remit we have no comments on this consultation.		Comments Noted.
36	Mrs Jean Archer	General	Y	Y	Y		The lack of social housing is an absolute national DISGRACE and any/all efforts to improve the situation needs to be 100% applauded and supported		Comments Noted.
37	Alice Yau obo. VSM (NCGM) Ltd. [See also Rows 44, 122, 147, 161, and 176]	General		N	N	Positively prepared, Justified, Effective, Consistent with national policy	<p>Dear Sir/Madam,</p> <p>REPRESENTATIONS TO WANDSWORTH LOCAL PLAN PARTIAL REVIEW (PUBLICATION VERSION REGULATION 19 CONSULTATION)</p> <p>We write on behalf of our client, VSM (NCGM) Ltd (hereafter referred to as "VSM"), to make representations to London Borough of Wandsworth's (LBW) draft of the Wandsworth Local Plan Partial Review (hereafter referred to as the "LP Partial Review" or "Reg 19 LP Review"), which is a "publication" version of the Local Plan and is at the Regulation 19 stage in the development plan preparation process, pursuant to the Town and Country Planning (Local Planning) (England) Regulations 2012. The LP Partial Review is out for consultation from 13 January 2025 to 24 February 2025.</p> <p>The current LBW Local Plan was adopted on 19 July 2023 and covers the Plan Period 2023-2038. The Examination in Public ('EiP') for this Local Plan was carried out in November 2022 and the Plan was ultimately found sound by an Inspector, subject to Main Modifications and adopted in July 2023. As per the National Planning Policy Framework's (NPPF) (2024) paragraph 22, "strategic policies should look ahead over a minimum 15 year period from adoption, to anticipate and respond to long-term requirements and opportunities", the Local Plan covers a 15 year period. Given the recent adoption of this Local Plan, it is considered that to this current moment in time, the policies contained within it should still be considered relevant and sound. NPPF paragraph 4 notes that local plan policies should be reviewed to assess whether they need updating at least once every five years, particularly relevant strategic policies that relate to changing housing need figures, and notes "they are likely to require earlier review if local housing need is expected to change significantly in the near future." No clear justification has been provided as to the reasoning behind the LP Partial Review and the circumstances expected to have significantly changed, so as to require a review of key housing policies alone, 18 months after adoption. It is therefore considered that the LP Partial Review to date has been premature in its nature and has not allowed sufficient time for the monitoring of the recently adopted policies to accurately or reasonably assess their effectiveness. The NPPF defines effective plans when considering the 'soundness' of local plans (para 36) to be those that are deliverable over the plan period and therefore a revision that has been prepared in the immediate aftermath of adoption is not considered</p>		Comment Noted. Please see Row ID 44, 122, 147, 161, and 176 for responses to individual comments.

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						<p>to represent an approach to plan-making that considers the effectiveness of policy.</p> <p>Conversely, it is also noted that the London Plan (2021), which forms part of the Development Plan for LB Wandsworth, is due for review and that this is expected to progress shortly, with an initial Issues and Options document expected in the Spring 2025 and a full draft document anticipated in the Spring 2026.</p> <p>This, alongside the newly adopted NPPF and standard method for considering housing need, will constitute a significant change of context that will warrant a review of local planning policies. To draft the LP Partial Review in isolation of this will render the adopted document immediately out of date and will result in a further early review, which is an ineffective and inefficient approach to policy making. Not only is this a matter of good practice but is also considered necessary to best ensure LB Wandsworth's duty-to-cooperate is met in preparing their Local Plan. As such, it is considered that any review of the recently adopted Wandsworth Local Plan should await progression of such updates in policy at the Mayoral level, to ensure that the Local Plan aligns with this update.</p> <p>These representations focus on whether the Local Plan, as progressing, could meet the National Planning Policy Framework's (NPPF) (2024) four tests of soundness from paragraph 36, when submitted for examination at Regulation 19 stage in the development plan preparation process. For the avoidance of doubt, the four tests are:</p> <ul style="list-style-type: none"> • Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development. • Justified – an appropriate strategy, considering the reasonable alternatives, and based on proportionate evidence. • Effective – deliverable over the plan period and based on effective joint working on crossboundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground. • Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF and other statements of national planning policy, where relevant. <p>In addition to the NPPF tests of soundness, the Local Plan will be examined on meeting the legal requirements from the Section 19 Planning and Compulsory Purchase Act 2004 and the Town and Country Planning (Local Planning) (England) Regulations 2012. We do not wish to make comments on these matters at this stage; except the legal requirement for the Local Plan to be in general conformity to the London Plan (2021). Our views on the Reg 19 LP Review's conformity with the London Plan (2021) are expressed throughout these representations. The representations are set out in the following subheadings of this letter. For simplicity, each sub-heading reflects each chapter of the Reg 19 LP Review and contained within it is a table which assesses the relevant policies of each chapter in terms of the legal requirement for general conformity with the London Plan (2021) and the NPPF</p>			

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						<p>tests of soundness. The table also contains a column for suggested amendments. We have not listed the wording of the proposed policies to avoid repetition (as they are listed in full in the Reg 19 LP Review).</p> <p>The various Regulation 19 LP Review policies are not consistent with the London Plan (2021) and do not meet the NPPF's tests of soundness, as set out in the table above. Amending those policies in line with the aforementioned suggestions would help make the Local Plan legally compliant and sound.</p> <p>Notwithstanding, it is our overarching view that the Local Plan Review is premature to the New London Plan being drafted and the new housing need targets coming into effect in 2026. Drafting a Local Plan Review in isolation of the New London Plan drafting and the newly set housing targets will render local policy to be immediately out of date upon adoption and will trigger the need for a further early review. Applying good policy making practice and duty-to-co-operate principles dictates that the Local Plan Review should be prepared alongside the London Plan Review and new objectively assessed housing need targets. We trust that you will consider our comments and respond accordingly. We would like to highlight that this is an interim representation and that VSM reserves the right to submit further representations in due course as the review of the Local Plan progresses. In the meantime, we welcome the opportunity to discuss the comments with you further should you find this of assistance.</p>			
38	<p>Zelie Batchelor obo Watkin Jones</p> <p>[See also Row 43, 123, 146, 162 and 178]</p>	General		N		<p>Positively prepared; justified; effective; consistent with national policy</p>	<p>Dear Sir / Madam</p> <p>Wandsworth Local Plan Partial Review: Regulation 19 Consultation Representations on behalf of Watkin Jones PLC</p> <p>We write on behalf of our client, Watkin Jones PLC (the "Client / WJG") who have instructed us to make written representations in relation to the Local Plan Partial Review (the "Plan") which was published for consultation on 13 January 2025 by London Borough of Wandsworth (the "Council / LBW").</p> <p>About Watkin Jones PLC</p> <p>WJG is the UK's leading developer and manager of residential for rent homes. Its purpose-built build to rent (BTR), coliving and student homes are designed and built sustainably, and welcome people from all backgrounds to enjoy a great way of life, generating a positive impact for wider communities. Beyond residential for rent, its successful and well established home-building division has an increasing focus on the delivery of affordable housing products.</p> <p>With increasing pressure on many areas to quickly create new housing, WJG an excellent track record of delivering homes fast without compromising on quality. Over 95% of its developments are on site within six months of the grant of planning permission and its in-house construction capacity means that it can rapidly boost local housing supply. Over the</p>	<p>Comment Noted. As set out in these comments, the Local Plan Partial Review has been submitted under transitional arrangements set out in the December 2024 version of the NPPF. The Local Plan Partial Review will therefore be examined under the previous version of the NPPF. The Council does not consider it necessary to review its housing requirement as part of the Local Plan Partial Review on the basis of the contents of a version of the NPPF which is not being used to examine its Local Plan. More specifically, to directly apply the outcomes of the standard method as justification for broadening the scope of the Local Plan Partial Review would be inconsistent with these transitional arrangements and inconsistent with the long-standing role of the London Plan in establishing deliverable housing targets for London Boroughs. In any case, as set out in the Housing Background Paper, the Council considers that the policies set out in the Local Plan Partial Review should not have a negative impact on housing supply. Further justification for the Council's policies is set out in the Housing Background Paper.</p> <p>Please see Row ID 43, 123, 146, 162 and 178 for responses to individual comments.</p>	

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						<p>last 25 years WJG have delivered over 43,000 student beds across 130 sites, with a pipeline of over 12,300 BTR, student or coliving homes currently. It has delivered, or is currently delivering, over 5,000 units within London.</p> <p>Today, WJG successfully works across every part of the UK and closely engages with local authorities, neighbours, and a wide range of relevant stakeholders to focus on investing in central brownfield sites that make the best use of land, and create high quality, appropriately designed places. Its end-to-end delivery model means that it acquires, designs and build places, and often stays to manage them as a valuable long-term member of the community.</p> <p>Fresh are WJG's multi award-winning operator and manager of residential for rent schemes and works on behalf of a wide range of clients, managing over 20,000 rental homes and student bed spaces at over 60 sites across the UK and Ireland. Fresh achieves 95% customer satisfaction, and cares for its residents with a range of wellbeing and community building activities.</p> <p>Scope of Representations</p> <p>Our Client's representations are focused towards the policies relevant to the sectors that it operates in. As such, the representations focus primarily on the following policies:</p> <ul style="list-style-type: none"> • LP23: Affordable Housing; • LP24: Housing Mix; • LP28: Purpose Built Student Accommodation; • LP29: Housing with Shared Facilities; and • LP30: Build to Rent. <p>In preparing these representations, significant weight has been given to national planning policy set by the NPPF. It is important that proper regard is given to policy at the national level which sets prescriptive requirements for how Local Plans should be prepared in order to be capable of adoption.</p> <p>Each of the above policies are addressed in turn along with our proposed recommendations to the policies to ensure that the Plan as a whole meets the tests of soundness established by Paragraph 36 of the National Planning Policy Framework ("NPPF").</p> <p>New NPPF</p> <p>On 12 December 2024, the Government published the new version of the NPPF. This followed a 6-week period of consultation between September and October 2024. The new NPPF is a key component of the Government's aim of building the homes that the country needs.</p> <p>The proposed New Standard Method for calculating local housing need within the new NPPF adopts a two-step approach for each Local Authority Area:</p>			

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						<p>1. Take 0.8% of the current housing stock of the area; and</p> <p>2. Apply an uplift, based on a three-year average of the median workplace-based affordability ratio, with an increase of 15% for every unit above four.</p> <p>The local housing need in the London Borough of Wandsworth under the Previous Standard Method is 3,315 homes per year. The New Standard Method increases this target to 4,383 homes per year. As such, Wandsworth's local housing need has significantly increased, with an additional 1,068 homes being required annually in the Borough.</p> <p>Policy SDS1 (Spatial Development Strategy 2023-2038 (Strategic Policy) of the Local Plan establishes a housing target to deliver a minimum of 20,311 new homes between the plan-period of 2023-2038; equating to 1,354 dwellings per year. As such, the Local Plan housing target does not even strive to meet the local housing need target against the Previous Standard Method, let alone the New Standard Methodology. Against the New Standard Methodology, the Local Plan housing target represents only 30% of the objectively assessed housing need.</p> <p>Whilst the relevant transitional arrangements in Paragraph 234 of the NPPF will apply in this instance which means that the Local Plan Review will be examined against the previous version of the NPPF (and not the new NPPF), Paragraph 34 of the NPPF equally states the following:</p> <p>Policies in local plans and spatial development strategies should be reviewed to assess whether they need updating at least once every five years, and should then be updated as necessary. Reviews should be completed no later than five years from the adoption date of a plan, and should take into account changing circumstances affecting the area, or any relevant changes in national policy. Relevant strategic policies will need updating at least once every five years if their applicable local housing need figure has changed significantly; and they are likely to require earlier review if local housing need is expected to change significantly in the near future [emphasis added]. As Wandsworth's local housing need has increased significantly over and above the Local Plan housing target, it is clear that the Council will need to undertake an early review of the Plan, including a review ahead of the next mandatory review in 2028 (as it will be five years on from the adoption of the current Local Plan).</p> <p>Given that the policies that the Council seeks to amend will have a direct impact on housing delivery, given national legalisation, we would expect that the Partial Review would seek to include a review of additional housing sites to meet its objectively assessed local housing need as set by the New Standard Methodology. This is particularly the case because it is required to do so by the NPPF if local housing need has changed significantly. For this reason, we would question whether the fundamental principles of the Local Plan Review are sound, the basis that it is not positively prepared or consistent with national policy.</p>			

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						<p>This letter will shortly comment on the proposed amendments to the individual policies set out above. For convenience, we have set out the proposed policy wording and our recommendation on what amendments are required to make the policies sound. However, before doing so, it is necessary to comment on the evidence base that supports the Local Plan Partial Review, specifically the Whole Plan Viability Assessment prepared by BNP Paribas Real Estate, as this will determine whether or not such policy amendments are likely to be sound.</p> <p>In summary, we consider that the proposed amendments to the housing policies in the Local Plan will undermine the delivery of housing and therefore are not positively prepared. This comes at a time when LBW's objectively assessed local housing need has increased to 4,383 homes per year – a 323% increase above the Council's Local Plan housing target.</p> <p>On the basis that the NPPF encourages local authorities to undertake an early review of their Plan if local housing need is expected to change significantly, we would expect the Local Plan Partial Review to attempt to identify additional sites to meet its housing need which clearly undermines its robustness as a plan to meet the area's objectively assessed needs. The policies go well beyond the London Plan and are contrary to recent regional publications such as the PBSA LPG (Nov, 2024) and the Accelerating Housing Delivery Practice Note (Dec, 2024). In particular, the increase in the threshold for developments to qualify for the Fast Track Route and the inclusion of a late-stage review for such applications will discourage developers from taking this route and it is likely to result in more viability-tested applications. This will undoubtedly slow down the determination of planning applications and also result in less affordable housing being delivered.</p> <p>The amendments to Policy LP28 fail to acknowledge PBSA as a valid contributor to housing needs and the benefit it provides in freeing up conventional housing elsewhere, including Paragraph 71 of the NPPF and Paragraph 041 (Ref ID: 68-041-20190722) of the NPPG. It also fails to recognise PBSA as an enabler of conventional affordable housing. Finally, it will undermine the prospects of meeting the London Plan target to deliver 3,500 PBSA bed spaces per year. We have also identified concerns regarding the proposed wording of Policy LP29 and Policy LP30 which significantly undermine the deliverability of large-scale purpose-built shared living accommodation and Build to Rent respectively. Our review of the viability assessment that underpins the Local Plan Partial Review raises several areas where further clarification and justification is required to support the proposed Local Plan amendments to ensure soundness. The increased affordable housing requirements as well as changes to tenure mix requires strong viability evidence to demonstrate deliverability and, overall, we consider there is insufficient detail to provide certainty that such policies will not undermine the delivery of housing (including affordable) in the Borough.</p> <p>We therefore contest that the Local Plan Partial Review is unsound when considered in the context of Paragraph 36 of the NPPF. In particular, it is not:</p>			

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						<ul style="list-style-type: none"> • Positively Prepared – it does not provide a strategy which seeks to meet the area’s objectively housing needs; • Justified – the proposed policy amendments go way beyond the London Plan and are not an appropriate strategy to incentivise housing delivery, particularly as the London Plan policies and guidance are a reasonable alternative in this context; • Effective – the proposed policy amendments will stifle housing delivery and undermine the delivery of housing over the plan period; • Consistent with national policy – it does not provide a strategy which seeks to meet the area’s objectively housing needs. <p>We trust that our Client’s representations on these aspects of the Wandsworth Local Plan Partial Review Publication (Regulation 19) Version are of assistance to the Council in making these policies in the Local Plan sound in the context of the NPPF and will be taken into account to inform Regulation 22 of this Local Plan Partial Review. Our Client would be more than willing to meet with officers should they have any points of clarification</p>			
39	Ailish Collins obo Downing [See Also Row 45 and 148]	General				<p>London Borough of Wandsworth Local Plan Partial Review; Publication (Regulation 19) Version (February 2025)</p> <p>Representation on behalf of Downing</p> <p>01. INTRODUCTION</p> <p>01.1.1 We write on behalf of our client, Downing, to make representations on the draft Local Plan partial review (Regulation 19 Consultation).</p> <p>01.1.2 It should be noted that Downing do recognise and support the Council’s ambitions to deliver a fairer Wandsworth. Downing do, however also have concerns regarding some of the new requirements being sought through the draft changes to the recently adopted Local Plan, including the cumulative impact of these requirements on the viability and deliverability of developments. The development industry is experiencing sustained and significant increases in build costs and the introduction of new building standards and legislation, all of which are resulting in increasingly challenging development viability. Downing do not feel that this has been given sufficient consideration in the draft Local Plan policies.</p> <p>01.1.3 With this in mind, we offer the following comments on the proposed Reg 19 amendments to the following recently adopted policies</p> <ul style="list-style-type: none"> • LP23 – Affordable Housing • LP28 – Purposed Built Student Accommodation <p>01.1.4 The National Planning Policy Framework (NPPF) and National Planning Practice Guidance (PPG) sets out how Local Authorities should use proportionate financial viability evidence to support local plan policy requirements a. It expands on the statutory</p>		Comment Noted. Please see Row ID 45 and 148 for responses to individual comments.	

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						<p>requirements set out in the Town and Country Planning Act (1990), Planning Act (2008), Localism Act (2011) and CIL Regulations (2010) as amended.</p> <p>01.1.5 In respect of local plans, the NPPF and PPG confirms in setting local policy requirements and site allocations, an authority must:</p> <ul style="list-style-type: none"> • Ensure the plan is 'justified' (based on proportionate evidence) and 'effective' (deliverable over the plan period) (NPPF Paragraph 35); • Use a viability assessment to ensure that policies and allocations are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan (Ref ID: 10-002-20190509); and • Be informed by a proportionate assessment of viability (ID: 10-001-20190509). <p>01.1.6 Overall, the NPPF and PPG is clear that new local plan policy requirements must be evidence based and, critically, strike an appropriate balance with the potential effects on scheme viability.</p>			
40	<p>James Stevens obo Home Builders Federation</p> <p>[See also Row 46, 125 and 199]</p>	General				<p>Dear Sir / Madam</p> <p>Wandsworth Local Plan Partial Review, Regulation 19</p> <p>Thank you for consulting on the Partial Review to the Wandsworth Local Plan.</p> <p>The Home Builders Federation (HBF) is the representative body of the home building industry in England and Wales. The HBF's member firms account for some 80% of all new homes built in England and Wales in any one year, and include companies of all sizes, ranging from multi-national, household names through regionally based businesses to small local companies. Private sector housebuilders are also significant providers of affordable homes, building 50% of all affordable homes built in the last five years, including all homes for social rent.</p>		Comment Noted. Please see Row ID 46, 125 and 199 for responses to individual comments.	
41	<p>Andrew Hunt obo NHS Healthy Urban Development Unit</p>	General				<p>We have reviewed the corresponding local plan partial review consultation documents in conjunction with NHS partners in South West London's ICB and can confirm we have no substantial comments to submit against any of the draft policies included within this phase of the Council's local plan review.</p> <p>Nevertheless, we welcome many of the amendments made, particularly to policy LP31: Specialist Housing for vulnerable people and for older people and would like to take this opportunity to reiterate the importance of consulting relevant NHS partners in relation to any redevelopment of these types of specialist housing.</p> <p>We wish you the best of luck with the submission and look forward to the next phase of the council's local plan review.</p>		Support Noted.	

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LP23 – Affordable Housing									
42	Joseph Hickling obo George Potter House of Battersea [See also Row 144 and 200]	LP23		N		Positively prepared; justified; effective; consistent with national policy	<p>INTRODUCTION</p> <p>Background</p> <p>1.1 This response to the publication version of the Wandsworth Local Plan Partial Review ('WLPPR') (Regulation 19) and is submitted on behalf of George Potter House of House of Battersea which is a Care Home located at 130 Battersea High Street, Battersea, London, SW11 3JR.</p> <p>1.2 The Local Plan Review Response Form accompanies this representation.</p> <p>Site Context and Proposals</p> <p>1.3 George Potter House is triangular in shape and is currently in a Class C2 (Use Classes Order 1987 (as amended)) Care Home use. The Care Home consists of a number of wings which vary between 1 to 2 storeys in height. Two small car parking areas serve the site and are accessed from Battersea High Street and George Potter Way. The site is bounded to the east by Battersea High Street which comprises retail uses; there are residential uses to the north, west and south; and also a Methodist Church to the south.</p> <p>1.4 The adopted Local Plan identifies the northeastern frontage of the site as being located along an 'Important Local Parade Line'. The site is also in a '6 storey maximum height' zone and within flood zone 2 (although benefitting from flood defence).</p> <p>1.5 George Potter House of Battersea ('GPHoB') has the intention of redeveloping the site to improve the standards and quality of care accommodation, and envisages a scheme design which is more complimentary to the existing setting of Battersea High Street. The development would likely to continue providing a C2 use, but may also incorporate a mixed-use Element through the provision of residential facilities and ground floor retail units. This will serve to regenerate the northern corner of Battersea High Street and offer an enhanced interaction with the 'Important Local Parade' which is located opposite the site at 141-185 Battersea High Street.</p> <p>Scope of this Representation</p> <p>1.6 This representation comments on those matters which pertain directly or indirectly, to George Potter House of Battersea. Our comments regarding the Partial Update of the Local Plan are made in the context of the 'tests of soundness', as set out at paragraph 36 of the NPPF.</p> <p>These tests specify that for a Plan to be sound it must be; "Positively prepared – providing a strategy which, as a minimum, seeks to meet the area's objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and</p>	<p>Comment Noted.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need and is informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment.</p> <p>The Housing Needs Assessment identifies an extremely high need for affordable housing across the plan period, up to 23,600 affordable homes, a majority of which are needed for social rented housing. As set out in the Housing Background Paper, there are strong social and economic imperatives to plan to meet this need.</p> <p>The Council has specifically designed the policy to ensure it is effective and deliverable, as demonstrated through the evidence base. In particular, the Whole Plan Viability Assessment demonstrates that a significant number of development typologies would remain viable at a 45% threshold, which is the threshold required under the Council's Fast Track Route. As set out in the Housing Background Paper, there is also a strong correlation between the more viable typologies and the composition of the Council's housing trajectory. Together, these provide a clear demonstration of the policy being deliverable for a significant proportion of the types of developments likely to come forward over the plan period. This is further supported by a number of site-specific examples identified through the Housing Background Paper which have offered or been secured at an affordable housing percentage in excess of the existing 35% threshold. It is also noted that the policy retains a Viability Tested Route which means that developments which meet the full requirements of the policy can still receive planning permission. For these reasons, the Council considers the proposed approach to affordable housing to be justified, effective and deliverable. Further justification for the policy approach in relation to housing need, housing supply and viability is set out in detail in the Housing Background Paper.</p> <p>The Council has recommended a potential modification to be considered by the Inspector which would add content to the supporting text of Policy LP23 to further clarify how the phrase 'all potential' would be interpreted in the implementation of the policy.</p>	

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						<p>is consistent with achieving sustainable development; Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence; Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework and other statements of national planning policy, where relevant.”</p> <p>2. RESPONSE TO PROPOSED AMENDMENTS OF SUBMISSION PLAN POLICIES</p> <p>2.1 This Section provides George Potter House of Battersea’s comments on select amended policies of the Proposed Submission Plan.</p> <p>Policy LP23: Affordable Housing</p> <p>2.2 Draft Policy LP23 has been amended to closer align with London Plan Policies H4 and H5, rather than make reference to them as per the current adopted Plan. However, Part C of the draft Policy expects 50% of all new homes to be affordable at major developments. This deviates from Policy H5 of the London Plan where the threshold level of affordable housing on gross residential development is initially set at a minimum of 35%. The Viability Assessment (August 2024) which forms an Evidence Base document to the WLLPR does not assess the viability implications of this uplift. Without such an assessment, Part A should specifically make reference to the minimum 35% threshold in order to be clear and unambiguous. Therefore, as currently worded, Part A of draft Policy LP23 is unjustified and unsound.</p> <p>2.3 Part E requires that “applicants should demonstrate how <i>all potential</i> public subsidy options for maximising affordable housing have been utilised to increase the number of affordable habitable rooms on-site”. The draft policy and supporting text does however not explain or define ‘all potential’. Without guidance which explains the extent of when all ‘public subsidy options’ have been exhausted, undertaking such an exercise may be inconclusive which could cause unnecessary delay to the determination of applications, contrary to paragraph 11c of the NPPF. Therefore, as currently worded Part E is unclear and ambiguous, and therefore unsound.</p>			

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43	Zelie Batchelor obo Watkin Jones [See also Row 38, 123, 146, 162 and 178]	LP23		N		Positively prepared; justified; effective; consistent with national policy	<p>Whole Plan Viability Assessment, prepared by BNP Paribas Real Estate Taken individually, and particularly when viewed in concert, all of the proposed amendments to LP23 and LP28 will render policy compliant schemes much less viable. One might therefore assume that market conditions have improved significantly since the last viability assessment in January 2022 in order to justify the proposed changes. However, in reality the following movements in house prices and build costs have occurred over this period: • Flatted values in Wandsworth have declined by approximately 4%; and • the BCIS All-in TPI shows that build costs have increased by around 12%. We have therefore carried out a detailed review of the BNP Paribas (August 2024) Local Plan Viability Study to understand the level of justification behind the proposed changes.</p> <p>Review of Evidence Base Our review of the evidence base has highlighted several areas requiring further clarification.</p> <p>Benchmark Land Value Assessments BNPP's viability testing applies four separate Benchmark Land Value (BLV) assessments across 48 hypothetical scheme typologies. Their assessment of BLV is undertaken on an Existing Use Value Plus (EUV+) approach. This includes adopting Existing Use Values for four types of land uses and then applying a landowner's premium of 20%.</p> <p>The table provides a summary of BNPP's assessment of Benchmark Land Value:</p> <table border="1"> <thead> <tr> <th>Use</th> <th>Existing Use Value (£ per ha)</th> <th>Landowner Premium</th> <th>Benchmark Land Value (£ per ha)</th> </tr> </thead> <tbody> <tr> <td>Office</td> <td>£12.86m</td> <td>20%</td> <td>£15.44m</td> </tr> <tr> <td>Retail</td> <td>£7.64m</td> <td>20%</td> <td>£9.17m</td> </tr> <tr> <td>Industrial</td> <td>£5.07m</td> <td>20%</td> <td>£6.09m</td> </tr> <tr> <td>Open land</td> <td>£0m</td> <td>20%</td> <td>£0.50m</td> </tr> </tbody> </table> <p>Overall, we would note that BNPP's assessment of BLV have decreased across all land uses by 15% to 59% compared to the 2022 assessment. Given the more onerous new policies now proposed, it follows that BNPP's revenue assumptions must be significantly higher (and/or cost assumptions significantly lower) than those in the 2022 Local Plan Viability Assessment to compensate for the reduction in BLV. We consider BNPP's adopted revenue and cost assumptions later.</p> <p>We would note that BNPP's assessment reference 'secondary' office, retail, and industrial uses, as well as cleared land. The underlying assumption appears to be that only secondary brownfield sites will come forward for new residential development.</p> <p>We would also note that there is now no differentiation for office use within the Nine Elms area, and it remains unclear whether any of the 48 hypothetical scheme typologies are situated within this location. This omission could distort viability conclusions.</p>	Use	Existing Use Value (£ per ha)	Landowner Premium	Benchmark Land Value (£ per ha)	Office	£12.86m	20%	£15.44m	Retail	£7.64m	20%	£9.17m	Industrial	£5.07m	20%	£6.09m	Open land	£0m	20%	£0.50m	<p>In relation to the comparison between the 2022 Viability Study and the more recent study carried out by BNPP, it is important to note that the studies were carried out by two different consultants at two different times. As BNPP have extensive knowledge and experience of viability on London having carried out whole plan viability assessments for the majority of London boroughs, the Council is satisfied that their study is demonstrably robust. It would be difficult to carry out a like for like comparison due to the different methodologies applied.</p> <p>BNPP have applied an approach based on open market values and benchmark land values based on a significant number of comparables which are provided in the report. Although the typologies have not been tested by area, the study does include 9 different open market values ranging from £8,030/m2 to £14,240/m2, these correspond with the different locations across the borough including Nine Elms.</p> <p>BNPP have also included a separate value for office rents within Nine Elms in table - 4.13.1, showing the recognise the differences in rents with the wider area, applying rent of; Nine Elms: £601/m2 Elsewhere: £479/m2.</p> <p>In relation to the typologies tested on the basis of assumptions within Nine Elms, BNPP's response to this matter states; "the assessment incorporates the whole of the Borough including Nine Elms. Nine Elms is value zone I in the study".</p> <p>In response to the conservative values applied for existing use values, BNPP's response states:</p> <p>"The purpose of the exercise is to identify sites that accommodate buildings which do not make optimum use of the site, either in terms of income producing potential or containing poor plot ratios. These are typical of the types of sites that land owners are more likely to release for development. Where sites are generating high levels of income and where existing buildings optimise use of the site, landowners are clearly far less likely to release land for development and these sites are very unlikely to come forward for development. Using the latter types of sites as benchmarks would result in unrealistically high land values".</p> <p>In response to concerns, the appraisals incorporate a 5% contingency.</p> <p>In relation to student accommodation, the student housing typologies are based on an assumption of configuration as studios as this reflects the most common typology constructed by the private sector. The appraisals include the requirement for affordable student housing and identify potential for financial contributions towards conventional (C3) affordable housing to be delivered on other sites.</p>
Use	Existing Use Value (£ per ha)	Landowner Premium	Benchmark Land Value (£ per ha)																									
Office	£12.86m	20%	£15.44m																									
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						<p>Appendix 6 of BNPP's report outlines the key inputs and assumptions underpinning each EUV assessment, including rental values, yields, and rent-free allowances. We consider the assumptions adopted for industrial and open land use are particularly conservative, leading to undervalued EUV assessments. As a result, these assessments may not accurately reflect actual market conditions and could artificially inflate viability outcomes.</p> <p>For example, BNPP's EUV assessment for industrial use assumed a rental value of £12 per sq ft. However, their own research, presented in Appendix 3 of their report, provides evidence of industrial accommodation achieving significantly higher rental values, with an average rent of £26 per sq ft.</p> <p>Whilst we acknowledge that BNPP's analysis and assessment of BLV is necessarily high-level, we have concerns that they have significantly underestimated their assessment of EUV, and consequently BLV, which are used for their viability testing, rendering their conclusions to be unreliable.</p> <p>Contingency Allowance It is unclear whether BNPP's updated assessment includes any contingency allowances, raising concerns about the robustness of viability testing.</p> <p>Such allowances are typically a minimum of 5.00% of build costs and therefore have a material impact on viability. We seek confirmation that an appropriate contingency allowance has been included in the BNPP figures</p> <p>Affordable Housing Testing for PBSA. The methodology used to test affordable housing requirements for PBSA schemes lacks clarity. Specifically, it is unclear whether BNPP's assessment accounts for affordable PBSA beds, a financial contribution, or a combination of both. Further details are required on BNPP's key inputs and assumptions, including nomination agreements, tenancy lengths, operational expenditure (OPEX) allowances, and yield assumptions. These are highly sensitive variables that have a significant impact on scheme viability, yet they are not detailed in BNPP's report. Without this level of detail BNPP's analysis holds little weight.</p>	<p>Council's satisfaction, and subject to independent review, the maximum viable affordable housing contribution to be provided. The cost of any independent review must be covered by the applicant.</p> <p>Major Developments (10 dwellings or more (gross))</p> <p>C. For all major development proposals, applicants are expected to deliver 50% of all habitable rooms as affordable housing. Applicants that provide this level of affordable housing will not be required to provide viability information at application stage or be subject to a review mechanism (subject to the conditions of Part D below).</p> <p>D. Applicants may use the Greater London Plan's Fast Track Route, provided they meet the thresholds and requirements below and meet other Local Plan requirements.</p> <p>The threshold for affordable housing on gross residential development is:</p> <p>a) a minimum of 40% 30%; or b) 50% for public sector land where there is no portfolio agreement with the Mayor; or c) 50% for Strategic Industrial Locations and Locally Significant Industrial Areas (LSIA) in accordance with Policy LP34 (Managing Land for Industry and Distribution) and any non-designated industrial land that comes forward for residential uses in accordance with London Plan Policy E7 (Industrial intensification, co-location and substitution) where the scheme would result in a net loss of industrial capacity.</p> <p>1. To follow the Council's Fast Track Route, major development proposals must meet all other criteria set out in Policy LP23. The Council requires a mix of 20% 30% social rented housing (minimum), and 30% intermediate housing (maximum minimum), with the remaining 40% to be agreed by the Borough based on identified need, and higher levels of social rented housing are strongly encouraged.</p> <p>2. Fast tracked development proposals providing between 40 35-50% affordable housing by habitable room are not required to provide a viability assessment at application stage, however, an early and late review mechanism will be applicable and are not subject to a review mechanism, except where an agreed level of progress on implementation is not made within two years of the permission being granted, in which case an early-stage review will be triggered.</p> <p>3. Fast tracked development proposals providing at least 50% affordable housing by habitable room are not required to provide a viability assessment at application stage and are not subject to a review mechanism, except where an agreed level of progress on implementation is not made within two years of the permission being granted, in which case an early-stage review will be triggered.</p> <p>E. Where development proposals do not meet the threshold level (as per part D), applicants should demonstrate how all potential public subsidy options for maximising affordable housing have been utilised to increase the number of affordable habitable rooms on-site. In these circumstances, applicants will be required to use the Viability Tested Route and will be required to submit detailed viability information. This will assess the maximum level of affordable housing (and any other required planning contributions) that a development can deliver and will be subject to independent review, the cost of which must be covered by the applicant. Proposals that cannot reach the required threshold will be expected to maximise the level of social rented housing wherever possible.</p> <p>F. Development proposals which follow the Viability Tested Route and are granted permission for a non-policy compliant level of affordable housing will be subject to detailed review mechanisms (early and late stage) throughout the period up to full completion, including an advanced stage review mechanism.</p> <p>Vacant Building Credit</p> <p>G. The application of the Vacant Building Credit (VBC) is not appropriate in Wandsworth. The use of VBC will only be considered in limited circumstances, where applicants clearly demonstrate there are exceptional reasons why it is appropriate and all of the following criteria are met:</p> <p>1. The building is not in use at the time the application is submitted; 2. The building is not covered by an extant or recently expired permission; 3. The site is not protected for alternative land use; 4. The building has not been made vacant for the sole purpose of redevelopment.</p>	<p>The shared ownership capital values are identified in full in Table 4.11.1. The values for shared ownership are capped at the amount shown in Table 4.11.1 and this is reflective of the lowest unrestricted market value in the Borough-wide range.</p> <p>In relation to the 10% reduction applied to Build to rent scenarios, this approach has been applied in other London borough whole plan viability assessments by BNPP which have been examined and found sound. However, BNPP have confirmed that the testing does not reflect the forward funding structures sometimes applied on BTR schemes which would result in higher residual land values, as BTR does not always follow a forward funded model so would be inaccurate to model all BTR typologies in this manner.</p> <p>In relation to co-living / shared living, within Whole Plan Viability Assessments, it is key to ensure common site typologies are tested, the Council has had very few co-living living schemes completed in the borough in the past 10 years therefore it would not be considered a common typology within the borough, the most comparable typology to co-living schemes are student housing which has been tested within the whole plan viability assessment.</p> <p>In relation to senior living and older person schemes, the proposed amendments to the policy from the adopted Local Plan policy are minimal and align closely with adopted policy.</p> <p>Further analysis of the viability assessment can be found within the Whole Plan Viability Assessment and the Housing Background Paper.</p> <p>The Council has developed its proposed policy approach to be in general conformity with the London Plan, including through retention of a 50% strategic target and a Fast Track Route, whilst incorporating additional features justified on the basis of local circumstances. The Housing Background Paper sets out examples of other London-based authorities who have adopted similar features into affordable housing policies whilst remaining in general conformity with the London Plan. Further analysis on conformity with the London Plan is set out in the Housing Background Paper.</p>	

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						<p>Shared Ownership Values The Shared Ownership values applied in the viability testing lack transparency, particularly in how they reflect variations in private residential values and affordability across different parts of the Borough. We therefore seek clarity on whether BNPP have varied Shared Ownership values by location, as would be prudent. Without this information, it is difficult to determine whether the proposed amendments will be viable Borough-wide.</p> <p>Other Observations The Build-to-Rent (BtR) viability testing is very simplistic, applying a 10% discount to private for sale values for each location alongside savings for developer profit. Further justification for this methodology is required. (A more thorough approach would be to carry out BtR specific appraisals including appropriate rents, yields and operational expenditure deductions).</p> <p>BNPP's assessment excludes testing for senior living and co-living schemes, whereas Porter Planning Economics' previous assessment considered all residential tenures. This omission makes it difficult to assess whether the proposed policy amendments beyond LP23 and LP28 are deliverable across all housing types. This is a particularly important omission given the current prevalence of co-living and senior living schemes.</p> <p>Conclusions Our review of the Whole Plan Viability Assessment that underpins the Local Plan Partial Review raises several areas where further clarification and justification is required to support the proposed Local Plan amendments. Without greater transparency and justification, it is considered that the supporting evidence base does not sufficiently support the proposed policy amendments, and therefore clarification is being sought from BNP Paribas Real Estate (as advisors to the Council) on the following matters:</p> <p>1. What justification can be provided for the significant decrease in Benchmark Land Value (BLV) across all land uses compared to the 2022 assessment? Given the scale of the reduction, is there a risk that this undervaluation</p>		<p>In relation to affordable housing tenure, the London Plan (Policy H6) identifies that a minimum of 30 per cent should be low-cost rented homes (effectively social rented), 30 per cent intermediate products and the remaining 40 per cent based on identified need. The Council's proposed policy satisfies these general parameters and is justified by the high level of need for social rented housing identified through the Housing Needs Assessment. The inclusion of the words "minimum" and "maximum" reflect the extremely high need locally for social rented homes by acknowledging in the policy that there is not expected to be a need to routinely justify developments which provide more than 70% social rented housing at the application stage. This would include, for example, developments brought forward by the Council or registered providers as 100% social rented. Further analysis of the justification for the tenure split is set out in the Housing Background Paper and informed by the Housing Needs Assessment.</p> <p>The policy approach is considered to be sufficiently flexible to account for changing demand. The Council would expect this policy to be reviewed as part of any subsequent review of the Local Plan well before the end of the 15-year plan period.</p> <p>The Council has recommended a potential modification to be considered by the Inspector which would add content to the supporting text of Policy LP23 to further clarify how the requirement for evidence of meaningful discussions with Registered Providers would be interpreted. The Council understands that securing a Registered Provider is a fundamental part of affordable housing delivery in most cases and that Registered Providers are more likely to bid for affordable housing is they are engaged early. The Council considers this requirement to therefore be good and appropriate practice.</p> <p>[Also see Response to Row 48]</p>	

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						<p>distorts the overall viability conclusions?</p> <p>2. Why does BNPP's assessment focus solely on 'secondary' office, retail, and industrial uses? Has adequate consideration been given to the likelihood of higher-quality, prime sites, or office sites in the Nine Elms area, coming forward for residential development? If not, could this omission undermine the robustness of the assessment?</p> <p>3. Can it be confirmed whether contingency allowances have been included in the assessment? If so, at what level, and are they consistent with market norms? If not, does this introduce an undue level of risk into the viability conclusions?</p> <p>4. How has BNPP accounted for the increased affordable housing requirements in Purpose-Built Student Accommodation (PBSA) schemes? Does their assessment reflect the provision of affordable PBSA beds, a financial contribution, or a combination of both? If not, could this lead to an inaccurate representation of scheme viability?</p> <p>5. Can BNPP provide greater transparency on the key inputs and assumptions for PBSA viability testing? Specifically, how have rental values, tenancy lengths, nomination agreements, operating expenditure (OPEX), and yield assumptions been determined, and are they justified?</p> <p>6. How have BNPP determined the Shared Ownership values used in the viability testing?</p> <p>7. Do BNPP's adopted Shared Ownership values vary by location to reflect the differences in private residential values and affordability across the Borough? If not, does this risk misrepresenting the true viability position for different areas?</p> <p>It is therefore strongly encouraged that the Council to carefully reconsider the impact of</p>		<p>The application of a Late Stage Review for Fast Tracked developments providing between 45-50% is intended to provide further incentive for applicants to maximise the amount of affordable housing they deliver in the context of the overall 50% strategic target set out in both the London Plan and Council's Local Plan.</p> <p>The requirement for schemes following the Viability Tested Route to additionally be subject to mid-stage reviews is intended as a discretionary measure for larger, multi-phased sites. A potential modification to the supporting text of Policy LP23 has been recommended to the Inspector which would further clarify the interpretation of the policy in relation to mid-stage reviews.</p>	

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						<p>these amendments and ensure that any policy changes are justified, viable, and consistent with national planning policy to support sustainable development and the delivery of affordable housing across the Borough.</p> <p>LP23: Affordable Housing</p> <p>The proposed updated wording of Policy LP23 is as follows:</p> <div style="border: 1px solid black; padding: 5px;"> <p>LP23 Affordable Housing</p> <p>A. The Council will seek to maximise the delivery of affordable housing with a strategic target of 50% of all new homes (by habitable room) to be affordable. The affordable homes provided should be genuinely affordable for the majority of residents in the borough and, therefore, should prioritise the delivery of social rented housing which is the tenure most needed within the borough. This will be achieved by the following:</p> <ol style="list-style-type: none"> 1. Affordable housing required from major developments must be provided on-site, unless the conditions below are satisfied: <ol style="list-style-type: none"> a) Off-site delivery of affordable housing from major developments will only be accepted in exceptional circumstances where it can be demonstrated that on-site delivery is not feasible, including where an applicant can demonstrate, with evidence, that it has not been possible to secure a provider from any of the Council's preferred Registered Providers or any other Registered Providers operating within Wandsworth, or where it can be demonstrated that off-site provision on another site in the borough would deliver significantly more family-sized affordable homes and/or more social rented homes to a higher standard. In all cases where off-site provision is proposed, applicants will be required to identify a site(s) which would be acceptable for the development of affordable housing. b) Subject to satisfying Part a, where it is clearly demonstrated to the Council's satisfaction that on-site delivery is not feasible and an appropriate alternative site for off-site delivery cannot be identified, the payment of a financial contribution in lieu of on- and off-site delivery will be considered. Payments in lieu and any financial contributions towards affordable housing must be at least equivalent to the increased gross development value resulting from affordable housing not being provided on-site. 2. Where on-site affordable housing is provided, the Council will require an affordable housing tenure split of a minimum of 70% social rent and maximum of 30% intermediate housing (preferably in the form of a rented intermediate tenure) by habitable room. Applications for development proposals which provide affordable housing on-site will require evidence of meaningful discussions with Registered Providers which have informed the proposed tenure, size of units, service charge rates, access and design to address local priorities, aligning with the housing mix included within Policy LP24 (Housing Mix). </div>			

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						<p>3. Development proposals involving the provision of affordable housing will be expected to be tenure blind, achieving the same high-quality standards as the market housing element of the scheme in terms of accessibility, internal space requirements, external appearance, design quality and provision of private outdoor space.</p> <p>4. Development proposals involving the loss of any existing affordable housing will not be accepted, unless it would result in the provision of at least an equivalent amount of affordable housing and deliver a net uplift in the number of social rented by dwellings and/or habitable room. Estate regeneration will be required to provide at least the equivalent amount and tenure of affordable housing by habitable room and is expected to achieve an uplift in provision.</p> <p>Small Sites (1-9 dwellings (gross))</p> <p>B. Developments delivering between 1 and 9 residential dwellings (gross) are required to provide a financial contribution to support the delivery of affordable housing in the borough. The level of contribution required will be £50,000 per unit on a gross basis (subject to indexation). In exceptional cases where a financial contribution is not considered by the applicant to be financially viable, the applicant must provide the Council with a viability assessment which demonstrates to the Council's satisfaction, and subject to independent review, the maximum viable affordable housing contribution to be provided. The cost of any independent review must be covered by the applicant.</p> <p>Major Developments (10 dwellings or more (gross))</p> <p>C. For all major development proposals, applicants are expected to deliver 50% of all habitable rooms as affordable housing. Applicants that provide this level of affordable housing will not be required to provide viability information at application stage or be subject to a review mechanism (subject to the conditions of Part D below).</p> <p>D. Applicants may use the Council's Fast Track Route, provided they meet the thresholds and requirements below and meet other Local Plan requirements.</p> <p>The threshold for affordable housing on gross residential development is:</p> <p>a) a minimum of 45%; or b) 50% for public sector land where there is no portfolio agreement with the Mayor; or c) 50% for Strategic Industrial Locations and Locally Significant Industrial Areas (LSIAs) in accordance with Policy LP34 (Managing Land for Industry and Distribution) and any non-designated industrial land that comes forward for residential uses in accordance with London Plan Policy E7 (Industrial intensification, co-location and substitution) where the scheme would result in a net loss of industrial capacity.</p> <p>1. To follow the Council's Fast Track Route, major development proposals must meet all other criteria set out in Policy LP23. The Council requires a mix of 70% social rented housing (minimum) and 30% intermediate housing (maximum), and higher levels of social rented housing are strongly encouraged.</p> <p>2. Fast tracked development proposals providing between 45-50% affordable housing by habitable room are not required to provide a viability assessment at application stage, however, an early and late review mechanism will be applicable.</p>			

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						<p>3. Fast tracked development proposals providing at least 50% affordable housing by habitable room are not required to provide a viability assessment at application stage and are not subject to a review mechanism, except where an agreed level of progress on implementation is not made within two years of the permission being granted, in which case an early-stage review will be triggered.</p> <p>E. Where development proposals do not meet the threshold level (as per part D), applicants should demonstrate how all potential public subsidy options for maximising affordable housing have been utilised to increase the number of affordable habitable rooms on-site. In these circumstances, applicants will be required to use the Viability Tested Route and will be required to submit detailed viability information. This will assess the maximum level of affordable housing (and any other required planning contributions) that a development can deliver and will be subject to independent review, the cost of which must be covered by the applicant. Proposals that cannot reach the required threshold will be expected to maximise the level of social rented housing wherever possible.</p> <p>F. Development proposals which follow the Viability Tested Route and are granted permission for a non-policy compliant level of affordable housing will be subject to detailed review mechanisms (early, mid and late stage) throughout the period up to full completion, including an advanced stage review mechanism.</p> <p>Vacant Building Credit</p> <p>G. The application of the Vacant Building Credit (VBC) is not appropriate in Wandsworth. The use of VBC will only be considered in limited circumstances, where applicants clearly demonstrate there are exceptional reasons why it is appropriate and all of the following criteria are met:</p> <ol style="list-style-type: none"> 1. The building is not in use at the time the application is submitted; 2. The building is not covered by an extant or recently expired permission; 3. The site is not protected for alternative land use; 4. The building has not been made vacant for the sole purpose of redevelopment. 			
						<p>The proposed amendments to Policy LP23 are contrary to the London Plan and likely to result in developments being financially unviable and undeliverable, which will further suppress the ability for the Council to meet its objectively assessed local housing need. Analysis of the wording of Policy LP23 is set out below.</p> <p><u><i>A.2. Where on-site affordable housing is provided, the Council will require an affordable housing tenure split of a minimum of 70% social rent and maximum of 30% intermediate housing (preferably in the form of a rented intermediate tenure) by habitable room.</i></u></p> <p>The proposed requirement for a minimum of 70% of affordable housing proposed to be provided as social rent and a maximum of 30% as intermediate housing exceeds the London Plan Policy H6 (Affordable Housing Tenure) requirements which requires a minimum of 30% as low-cost rented homes, a minimum of 30% as intermediate housing, with the remaining affordable housing tenure to be determined by the authority based on the identified need. Restricting the minimum quantum of social rented affordable housing at 70% and maximum quantum of intermediate at 30% through the Local Plan provides inflexibility and does not account for potential changing demand over the lengthy 15-year plan period. We would question whether the Plan needs to go this far and whether the proposed approach is justified based on reasonable alternatives.</p>			

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						<p><u>A.2. Applications for development proposals which provide affordable housing on-site will require evidence of meaningful discussions with Registered Providers which have informed the proposed tenure, size of units, service charge rates, access and design to address local priorities, aligning with the housing mix included within Policy LP24 (Housing Mix).</u></p> <p>We would welcome justification of the need for this requirement given the difficulties of obtaining engagement from Registered Providers at planning stage who, understandably, are unwilling to commit significant resources to sites that they are not contractually committed to, nor benefit from planning permission. The implication of this requirement will therefore unnecessarily slow down the planning application process which would have a detrimental impact on overall housing delivery.</p> <p><u>D. Applicants may use the Council's Fast Track Route, provided they meet the thresholds and requirements below and meet other Local Plan requirements. The threshold for affordable housing on gross residential development is: a) a minimum of 45%</u></p> <p>LBW's proposed Fast Track threshold of 45% does not align with the London Plan Fast Track Route, and moreover, significantly exceeds the regional requirements of 35%.</p> <p>Indeed, London Plan Policy H5 (Threshold Approach to Applications) sets out the Mayor's aspirations for a minimum of 35% of gross residential development to be affordable, and therefore the proposed affordable housing provision suggested by LBW demonstrates a 10% increase above regional policy.</p> <p>In addition, the proposed LBW borough Fast Track Route is contrary to Paragraph 3.7 of the December 2024 GLA published 'Accelerating Housing Delivery: Planning and Housing Practice Note' which states that: "a small number of boroughs have proposed local plan affordable housing policies with a site-specific requirement that is higher than the 35 per cent private land threshold in Policy H5. Where such policies have been adopted, the borough may require the applicant to follow the VTR even where the application meets the relevant London Plan criteria for following the FTR. Although intended to secure a higher level of affordable housing, where not supported by robust viability evidence, this approach can disincentivise applicants from following the FTR, slow down the planning process and require additional resourcing to assess the application". As such, this draft policy conflicts with very recent London Plan guidance which recommends authorities to not exceed London Plan policy requirements in attempt to not deter housing delivery.</p> <p><u>D.1. To follow the Council's Fast Track Route, major development proposals must meet all other criteria set out in Policy LP23. The Council requires a mix of 70% social rented housing (minimum) and 30% intermediate housing (maximum), and higher levels of social rented housing are strongly encouraged.</u></p> <p>As mentioned above, the proposed requirement for a minimum of 70% of affordable housing proposed to be provided as social rent and a maximum of 30% as intermediate</p>			

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						<p>housing exceeds the London Plan Policy H6 and restricts potential changing demand over the lengthy 15-year plan period. We do not consider that the proposed approach is justified based on reasonable alternatives.</p> <p><u><i>D.2. Fast tracked development proposals providing between 45-50% affordable housing by habitable room are not required to provide a viability assessment at application stage, however, an early and late review mechanism will be applicable.</i></u></p> <p>The requirement for a late-stage review for developments that align with the Fast Track Route does not align with London Plan Policy H5 (Threshold Approach to Applications) requirements. The effect of this proposed policy change is likely to discourage developers from following the Fast Track Route since a key benefit of the Route is the omission of the late stage review which provides greater certainty of the end development costs of a project. The uncertainty of late-stage reviews makes it difficult to appraise sites for funding and underwriting purposes which, in turn, will slow down or deter development.</p> <p>Furthermore, by imposing a late-stage review for the Fast-Track Route and narrowing the gap between the Fast-Track Route and the Viability Tested Route, it will likely make the Viability Tested Route a more attractive proposition than what is currently which, in turn, will slow down the determination of planning applications and potentially even lead to less affordable housing being delivered of overall.</p> <p><u><i>F. Development proposals which follow the Viability Tested Route and are granted permission for a non-policy compliant level of affordable housing will be subject to detailed review mechanisms (early, mid and late stage) throughout the period up to full completion, including an advanced stage review mechanism.</i></u></p> <p>The requirement for Early, Mid and Late-Stage Viability Review mechanisms for developments following a viability tested route exceeds London Plan Policy H5 policy requirements which details that only Early and Late-Stage Viability Reviews are required for viability tested developments.</p> <p>Furthermore, Mid-Stage Viability Reviews are only seen as necessary for larger phased schemes within Policy H5, and therefore Policy LP23 is contrary to regional policy. This is supported by the Mayor's 'Affordable Housing and Viability' SPG (2017) guidance which outlines that on larger developments that will be built out over a number of phases, LPAs should also consider mid-term reviews which are triggered prior to the implementation of each phase.</p> <p>In addition, London Plan Draft Guidance 'Development Viability' (2023) states that Mid-Stage Viability Reviews should be provided for larger phased schemes including those that propose 500 or more residential units (or for mixed-use schemes, the equivalent amount of development in floorspace, taking into account proposed residential and non-residential uses). There may also be other circumstances where Mid-Stage Viability Reviews are required, for example, where the overall construction programme is five years or longer, or for estate regeneration schemes.</p>			

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							<p>This being said, Part D.2. of Policy LP23 only mentions Early and Late-Stage Viability Review mechanisms, and supporting text of Policy LP23 (Paragraph 17.18) states that a Mid-Stage Viability Review will be at the discretion of the Council, better aligning with London Plan policy requirements as outlined above. Therefore, clarity needs to be provided by LBW as to whether the aspiration is for a Mid-Stage Viability Review to be mandatory for all viability tested developments, or only for larger phased developments, as per London Plan requirements.</p> <p>On the whole, we consider that the wording of the Policy LP23 as set out in the Local Plan Partial Review is unsound. It is neither justified in the context of the London Plan, nor will it be effective as a policy to deliver housing. Our suggested amendments to Policy LP23 to make it sound are set out below.</p>		

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44	Alice Yau obo. VSM (NCGM) Ltd. [See also Rows 37, 122, 147, 161, and 176]	LP23		N	N	Positively prepared; justified; effective; consistent with national policy	<p>DRAFT POLICY LP23- AFFORDABLE HOUSING Draft Policy LP23 – Affordable Housing</p> <p>London Plan conformity Draft Policy LP23 sets out amended threshold levels of affordable housing required to follow LBW's Fast Track Route: as a minimum of 45%; or 50% on publicly owned land, Strategic Industrial Locations, Locally Significant Industrial Areas; or nondesignated industrial land where there is a net loss of industrial capacity. The key change is the 45% Fast Track Route threshold for private, land or where there is no net loss of industrial capacity, which has increased from the currently adopted 35%. Within London Plan Policy H5 (Threshold approach to applications), the threshold level of affordable housing is 35% for private land (or 50% for public-sector or industrial land). Therefore, whilst the London Plan and Adopted Local Plan are in conformity with respect to the threshold approach to applications, draft Policy LP23 does not meet the test of conformity with the London Plan by virtue of the significantly more onerous 45% threshold.</p> <p>The Mayor provided guidance on Accelerating Housing Delivery in a Planning and Housing Practice Note published in December 2024, which sets out the rationale behind the threshold approach to applications. The guidance notes the success of the threshold approach in securing affordable housing delivery, stating that it has "helped to secure significantly higher levels of affordable housing through the planning process in approvals and residential completions" since its first adoption by the Mayor in 2017 (paragraph 3.5). However, Paragraph 3.7 of the Practice Note states "a small number of boroughs have proposed local plan affordable housing policies with a site-specific requirement that is higher than the 35 per cent private land threshold in Policy H5". The paragraph advises that, "although intended to secure a higher level of affordable housing, where not supported by robust viability evidence, this approach can disincentivise applicants from following the FTR [Fast Track Route], slow down the planning process and require additional resourcing to assess the application. It can also result in lower levels of affordable housing being secured or reduce the effectiveness of viability reviews." [Turley emphasis] The Note provides further context by observing that, between 2018 and 2023, the average proportion of affordable housing in referable applications that followed the Fast Track Route has been consistently higher than those that followed the Viability Tested Route. On this basis, paragraph 3.8 of the Note concludes that, where LPAs apply higher thresholds for the Fast Track Route than the London Plan, this "risks the successful implementation of the London Plan threshold approach which is a matter of strategic concern for the Mayor", and that the GLA will continue to raise this as an issue of general conformity with the London Plan at local plan consultations and inquiries. Thus, the proposal to increase the Fast Track threshold to 45% is not considered in conformity with the London Plan and undermines the aim of London Plan Policy H5, and the strategic aims of the London Plan, which is to ensure the timely implementation and completion of affordable housing through deliverable planning permissions. Whether the viability evidence is sufficiently robust to justify this higher threshold is considered below in assessing whether the policy is justified, in accordance with the NPPF tests. It is also noted that the adopted London Plan (2021) is due to be reviewed shortly, with the initial high-level approaches to key topics and policy, to be set out later in spring and summer</p>	<p>It is suggested that the Fast Track Thresholds and affordable tenure mix are maintained as currently adopted, in line with the London Plan, to ensure that deliverability of key sites is not compromised. It is also suggested that any Partial Review of the Local Plan to cover Policy LP23 awaits further progression of the New London Plan, to ensure that the policy can be better aligned with this from the outset.</p>	<p>The GLA have clearly set out within the Practice Note that this is aimed at providing a short-term solution to the delivery of housing, and is more closely aligned with providing support the Registered Providers and the purchase of affordable homes through S106 to help incentivise delivery. Local Plan policy however needs to consider a longer-term approach to delivery as a Local Plan period is at least 15 years. A number of the approaches within the Practice Note are time limited to 3 years from the publishing date of the note (24.12.2024), showing it is aimed at providing short term solutions to current issues within the development industry.</p> <p>Although the London Plan approach seeks to provide a consistent approach across London, there are of course significant disparities in relation to market values and land values which consequently create differences in the viable level of affordable housing deliverable in different parts of London. As stated in its Local Plan, the Council want to maximise affordable housing within the borough, in response to very high levels of need. Past trends on large developments within the borough such as Nine Elms clearly show that simply building large numbers of housing does not necessarily generate large numbers of affordable homes or higher numbers of Social Rented homes which is the most in demand within the borough.</p> <p>Overall, the Whole Plan Viability Assessment results show that 77% of the models tested can viably provide 45% affordable housing within BLV 2, 3 and 4 (this includes retail, industrial and cleared land respectively). This figure reduces to 70% of models being viable at 45% affordable housing, when the BLV 1 (existing office space) is included, and does show a more challenging viability picture due to the higher existing use values of office space. However, as identified within the Housing Background Paper, only small proportion of the Councils housing pipeline is on existing office space.</p> <p>In addition, where sites are generating high levels of income and where existing buildings optimise use of the site which is the case for many existing office uses, landowners are clearly far less likely to release land for development, and these sites are very unlikely to come forward for development. It would be unrealistic the base the borough's viability position on a BLV which illustrates a more challenging position, and makes up a small proportion of projected housing completions.</p> <p>Further analysis of the viability assessment can be found in the Whole Plan Viability Assessment and Housing Background Paper.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The</p>

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						<p>2025. The current direction of the emerging policy is unknown, but the review will need to consider the effectiveness of the existing Threshold approaches set out in Policy H5, and the housing delivery impacts of this, especially in the context of the current market. It is therefore considered that LB Wandsworth's partial review of Policy LP23 is premature. Given the emphasis in the GLA's Accelerating Housing Delivery Note on delivery, and the potential for some circumstances in which the Fast Track Threshold should be lowered to help facilitate this (such as on sites where the affordable is 100% social rent), the review of Local Policy LP23 should be delayed to be considered in the context of the emerging approach to London Plan policy and to ensure alignment from the outset with emerging new policy approaches both to affordable housing provision, as well as housing delivery targets.</p> <p>NPPF: positively prepared</p> <p>No comment.</p> <p>NPPF: justified</p> <p>In addition to setting a higher threshold for private non-industrial land to follow LBW's Fast Track Route, draft Policy LP23 additionally requires an affordable tenure mix of 70% social rented housing as a minimum, and 30% intermediate housing as a maximum (with higher levels of social rented housing being strongly encouraged). This is a change from the requirement of adopted Local Plan LP23 for at least 50% low-cost rent products, with a balance of other intermediate products: specifically, a significant increase in the required mix of social rented housing and decrease in the allowed proportion of intermediate products. These proposed increases to the Fast Track threshold and changes to affordable tenure mixes have been tested in the updated Viability Assessment, prepared by BNP Paribas, dated August 2024. This finds that there is not one percentage threshold that is viable across all the site typologies within the borough. However, the summary of key findings notes that "That said, the outputs of our appraisals indicate that a majority of development typologies we have tested are able to support 40% to 45% affordable housing with a tenure mix of 70% social rent and 30% intermediate." [Turley emphasis], and thus that the proposed policy to increase the Fast Track Threshold is justified, accordingly. From our review of the Viability Assessment, it is not considered that this position is fully justified based on the evidence presented. The reasons for this are set out, in turn, below:</p> <p>Firstly, it is noted that the variables set out in the methodology that the proposed changes to LP23 were being tested against, did not account for the other proposed amendments to Policy under the Partial Review. Chapter 4 sets out the Appraisal Assumptions and notes at paragraphs and tables 4.9-4.10 that the housing mix applied is that sought by the current adopted Local Plan Policy LP24, rather than the proposed amendments to LP24, and the sensitivity testing does not sufficiently account for the proposed changes. As such, this testing is considered to not fully account for the proposed situation under the Local</p>		<p>Housing Needs Assessment identifies an extremely high need for affordable housing across the plan period, up to 23,600 affordable homes, a majority of which are needed for social rented housing. As set out in the Housing Background Paper, there are strong social and economic imperatives to plan to meet this need.</p> <p>The Council has specifically designed the policy to ensure it is effective and deliverable, as demonstrated through the evidence base. In particular, the Whole Plan Viability Assessment demonstrates that a significant number of development typologies would be viable at a 45% threshold, which is the threshold required under the Council's Fast Track Route. As set out in the Housing Background Paper, there is a strong correlation between the most viable typologies and the types of sites expected to contribute to the Borough's long-term housing supply, such that there can be overall confidence in the policy being deliverable for a significant proportion of developments. The policy also retains a Viability Tested Route which means that developments which cannot maintain viability whilst meeting the requirements of the policy can still receive planning permission. The Council also considers it important that deliverability is evaluated across a plan period and as such that it is important to avoid giving disproportionate weight to short-term market conditions when there is a fair and evidenced expectation that market conditions will improve across the plan period. For these reasons, the Council considers there to be no likelihood of the proposed policy having a materially negative impact on local housing supply or deliverability and considers the policy to provide an effective and proportionate mechanism for addressing developments which cannot meet its requirements in full. There are a number of examples of recent developments achieving or offering affordable housing percentages in excess of the existing 35% threshold which demonstrate a higher threshold can be achieved. Further analysis of the matters summarised above, and the overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p>	

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						<p>Plan Partial Review.</p> <p>When reviewing the appraisal results at Tables 6.10.10-13 (appraisal results for the emerging policy tenure mix of 70% Social Rent and 30% Shared Ownership), it is noted that, across different Benchmark Land Value scenarios, a significant number of site typologies have a maximum affordable housing output of between 35% and 40% (i.e. meeting the current 35% Fast Track Route threshold, but falling short of the draft proposed threshold). The majority of scheme's identified within the appraisal which achieve the 35% output, or less, are medium- to high-density flatted schemes with medium Benchmark Land Values, on land previously developed for secondary office, retail or industrial uses. It is noted that such sites also make up a large proportion of the borough's site allocations, adopted in 2023- predominantly comprise brownfield (non-vacant) sites that would accommodate medium- to highdensity development on sites of typically 1-3 hectares. These are therefore considered to be amongst the key site typologies that are needed to contribute towards LBW's housing supply and affordable housing need. However, these site typologies are identified in the appraisal as largely falling short of the draft policy requirements. This suggests the draft policy is overly onerous and would restrict such site typologies from coming forward within the plan period.</p> <p>The latest LBW Monitoring Report 'Housing Trajectory and Summary Tables 2023/24' shows a large number of allocated sites without planning permission, along with the indicative expected housing delivery capacity. It is noted that of those that are expected to deliver large numbers of housing on a single site (160 to 460 homes) are largely existing brownfield industrial land, of medium density deliverysee footnote for some examples. A large number of such sites are shown in table 6.10.12 of the Viability Assessment, as achieving 35-40% affordable provision. Assuming that the sites are re-providing the existing industrial floorspace capacity, this means that a large number of such sites would be able to progress through the Fast Track under the current adopted Threshold approach (set at 35%), but not under the emerging, draft threshold (45%). Ensuring that these sites can come forward and are deliverable, is considered key to LBW achieving its housing targets. Although it is noted that LB Wandsworth is currently meetings its Housing Delivery Test (112% for 2023), this is based on the currently adopted London Plan (2021) housing target of 1,950 homes per year. The new London Plan is being drafted and is likely to be informed by the new indicative housing need numbers calculated using the Government's new standard method (December 2024). This could mean LB Wandsworth's housing target could increase by circa 125% to circa 4,383 homes per year. As such, there is significant risk LB Wandsworth will fail to meet its future housing need with a high Fast Track affordable housing threshold, as a large number of the key sites within the housing delivery pipeline that currently might qualify for Fast Track (at 35%), would no longer be eligible for Fast Track under the draft policy.</p> <p>As noted in the Mayors Accelerated Housing Note, December 2024, the Fast Track Approach is to be applied where possible to help incentivise delivery of both market and affordable housing. If not achieving this Threshold, a large number of significant sites</p>			

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						<p>within LBW's 5 Year Housing Land Supply, notably on medium density industrial sites, would potentially be stalled in viability discussions, resulting delayed and potentially stifled delivery overall. Paragraph 6.7 of the Viability Assessment notes that it would not be appropriate to apply a zonal approach to threshold targets, and this is agreed. However, the inappropriateness of this approach to address vastly varying circumstances across the borough, is not considered sufficiently robust as to justify setting a much higher threshold as a blanket across the borough that may significantly limit and strain a high number of sites.</p> <p>In summary, whilst the majority of sites achieve 45% affordable provision capability in the Viability Assessment, this is not considered to robustly or sufficiently justify the draft policy Fast Track Threshold to be increased from 35% to 45%. The majority of site's that are able to achieve this, as per the Viability Assessment, do not represent LBW as a borough which, as an inner London borough, does not have large areas of vacant land. Instead, it is noted that the site typologies that make up a large proportion of Wandsworth's allocated sites for housing delivery pipeline, have the potential to proceed under the current adopted Fast Track Threshold, but would not achieve the required 45% under draft policy. Therefore, the draft policy amendments would lead to the potential stifling of much needed housing, including affordable, delivery.</p> <p>NPPF: effective</p> <p>As noted above, LBW has an increasing need to ensure a pipeline of completed development to meet the Government's housing targets, particularly following the revised Standard Method for calculating housing supply which, as of the new NPPF's publication in December 2024, would amend LBW's housing target from 2,559 dwellings to 3,880 per annum (a difference of 52%)²</p> <p>. More significantly, in comparison to the adopted London Plan (2021) target for LB Wandsworth, this is a 125% increase. Furthermore, it is acknowledged and agreed that LBW has a strong need for additional affordable housing, with an identified minimum overall need of 14,601 affordable homes as set out in the Wandsworth Housing Background Paper (January 2025). It is already noted that increasing the Fast Track Threshold is not sufficiently justified across the borough, however it is furthermore considered that the proposed updated policy approach could also prove less effective than the existing adopted policy position, in delivering these much-needed affordable homes. The creation of significantly more challenging circumstances in relation to viability of development – through the additional affordable housing requirements over those already evidenced and set out in the London Plan – is considered to stifle housing delivery, including affordable tenures. This is considered to be run counter to the aim of draft Policy LP23 and LBW in general, as evident through the Housing Background Paper, to increase affordable housing delivery. It therefore follows that draft Policy LP23, in its current form with the proposed new 45% threshold plus a requirement for 70% of the affordable tenure as social-rented housing, fails to meet the 'effective' test of soundness within the NPPF when considering the impact it has on delivery in practice.</p>			

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						<p>It is acknowledged that some site circumstances might allow for a higher affordable provision than might be achieved by maintaining the Fast Track Threshold in line with London Plan (35%). However, it is of paramount importance that the ability is preserved for LBW's key site typologies (i.e. 200+ medium density home schemes on brownfield sites) to be released for development under the Mayor's Fast Track approach (as outlined in paragraph 3.7 of the GLA's Accelerating Housing Delivery Practice Note).</p> <p>Overall, it is considered that the true measure of the effectiveness of Local Plan Policy LP23 in increasing affordable (and general) housing supply is to ensure its efficient delivery. LBW is recommended to take full advantage of the Mayor's Fast Track mechanism, through reservation of the evidenced 35% threshold within Policy LP23.</p> <p>NPPF: consistent with national policy</p> <p>Paragraph 35 of the NPPF states that "Plans should set out the contributions expected from development. This should include setting out the levels and types of affordable housing provision required, along with other infrastructure [...]. Such policies should not undermine the deliverability of the plan."</p> <p>As noted above, the levels and type of affordable housing, set out in draft Policy LP23 are considered to undermine the deliverability of the plan in relation to housing delivery, and is considered to have a potential detrimental effect on achieving both existing housing and affordable targets, as set out in LBW's Housing Needs Assessment (December 2024), as well as potential increases to housing delivery targets that are currently unknown.</p> <p>Suggested amendments to policy</p> <p>It is suggested that the Fast Track Thresholds and affordable tenure mix are maintained as currently adopted, in line with the London Plan, to ensure that deliverability of key sites is not compromised. It is also suggested that any Partial Review of the Local Plan to cover Policy LP23 awaits further progression of the New London Plan, to ensure that the policy can be better aligned with this from the outset.</p>			

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45	Ailish Collins obo Downing [See Also Row 39 and 148]	LP23					<p>02. LP23: AFFORDABLE HOUSING</p> <p>02.1.1 Downing strongly supports the use of the threshold approach as set out in the adopted London Plan in determining the required level of affordable housing on a site.</p> <p>02.1.2 It is however the respondents view that the policy requirements set out in Regulation 19 Draft Local Plan do not presently strike an appropriate balance between the approach to development of the Council's areas and the potential effects on scheme viability.</p> <p>02.1.3 They therefore risk inhibiting the delivery of development across the council's area including much needed new homes and affordable homes. This would undermine implementation of the key objectives of the relevant emerging local plan (including the delivery of new housing).</p> <p>02.2 LP23 – PART D</p> <p>02.2.1 Part D of the new draft Policy 23 is not supported and fails to be in compliance with the Strategic Development Plan – London Plan Policy H5 and the recently issued GLA Planning and Housing Practice Note December 2024. Downing opposes the proposed higher fast-track threshold of affordable housing given the stark lack of conformity with the London Plan.</p> <p>02.2.2 Within the Local Plan evidence base, the Housing Background Paper, Wandsworth refer to other London Boroughs that have higher affordable housing targets (Islington, Southwark and the draft Tower Hamlets Local Plan), however the two adopted plans also retain the GLA 35% fast track route and the Tower Hamlets local plan is only at Reg 19 pre EIP stage.</p> <p>02.2.3 Furthermore, since the publication of the London Plan's (2021) and these subsequent local plans, the delivery of residential led development in London has become particularly challenging due to a range of factors including:</p> <ul style="list-style-type: none"> • Sustained inflation in construction costs due to increases in the cost of energy, labour and materials. • Additional costs relating to fire and sustainability regulations. 	<p>REJECT HIGHER THRESHOLD FOR FAST-TRACK AND REVERT TO POLICIES IN LINE WITH THE ADOPTED LONDON PLAN H5.</p>	<p>The Council has developed its proposed policy approach to be in general conformity with the London Plan, including through retention of a 50% strategic target and a Fast Track Route, whilst incorporating additional features justified on the basis of local circumstances. The Housing Background Paper sets out examples of other London-based authorities who have adopted similar features into affordable housing policies whilst remaining in general conformity with the London Plan. Further analysis on conformity with the London Plan is set out in the Housing Background Paper.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The Housing Needs Assessment identifies an extremely high need for affordable housing across the plan period, up to 23,600 affordable homes, a majority of which are needed for social rented housing. As set out in the Housing Background Paper, there are strong social and economic imperatives to plan to meet this need. The Council has specifically designed the policy to ensure it is effective and deliverable, as demonstrated through the evidence base. In particular, the Whole Plan Viability Assessment demonstrates that a significant number of development typologies would be viable at a 45% threshold, which is the threshold required under the Council's Fast Track Route. As set out in the Housing Background Paper, there is a strong correlation between the most viable typologies and the types of sites expected to contribute to the Borough's long-term housing supply, such that there can be overall confidence in the policy being deliverable for a significant proportion of developments. The policy also retains a Viability Tested Route which means that developments which cannot maintain viability whilst meeting the requirements of the policy can still receive planning permission. The Council also considers it important that deliverability is evaluated across a plan period and as such that it is important to avoid giving disproportionate weight to short-term market conditions when there is a fair and</p>

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						<p>• Additional costs relating to higher interest rates.</p> <p>02.2.4 As a consequence, housing starts and completions are at their lowest levels since the wake of the 2008 financial crisis and many schemes are finding it impossible to exceed the GLA's 35% target set back in 2021 when the market was much stronger.</p> <p>02.2.5 The GLA has therefore issued guidance, in the form of a Practice Note dated December 2023, which seeks to support and accelerate the delivery of housing.</p> <p>02.2.6 In respect of the Fast Track approach, practice note states,</p> <p>2.1 Affordable housing secured through the planning system is estimated to account for half of affordable homes delivered nationally and more in London. As well as helping to address housing need this supports the provision of mixed and inclusive communities which is a key principle in the current and previous London Plans.</p> <p>2.2 The Mayor's policies and other interventions have helped to reverse the significant decline in affordable housing provision in residential developments between 2012 and 2016. Since then, the total number of affordable homes in referable applications approved by the Mayor as a proportion of all homes has increased from 25 to 38 per cent in 2023, and 46 per cent by habitable room. Net affordable housing completions in 2023/24 were at their highest level since 2011/12. The delivery of social and low-cost rent affordable housing for low-income households in London has also increased. This is in the context of higher overall housing delivery, with average net residential completions over the last eight years being significantly higher than in the period since 1991.</p> <p>2.3 This has been achieved in large part through the London Plan 'threshold approach' introduced in 2017 and other interventions under the Mayor's planning and housing powers. The threshold approach enables schemes that provide the relevant threshold level of affordable housing to follow the Fast Track Route (FTR). This has helped to ensure that affordable housing requirements are reflected in land values and sped up the planning process. Developments with a lower level of affordable housing are considered through the Viability Tested Route (VTR) to assess the maximum viable level of affordable housing, subject to reviews which determine whether this can be increased if viability improves over time.</p> <p>02.2.7 Furthermore, the Practice Guidance introduces a second lower threshold at 25% where the requirements for review mechanisms are relaxed. This indicates GLA's expectation is that many schemes will not be able to viably exceed 25% affordable housing due to the new constraints.</p> <p>02.2.8 If Wandsworth adopt a higher threshold, schemes which previously would have been considered fast track will be delayed by viability assessments, which take months to resolve and could ultimately result in the Council losing out on upfront affordable housing, due to the developer unwilling to take the commercial decision to agree the higher fast-</p>		<p>evidenced expectation that market conditions will improve across the plan period. For these reasons, the Council considers there to be no likelihood of the proposed policy having a materially negative impact on local housing supply or deliverability and considers the policy to provide an effective and proportionate mechanism for addressing developments which cannot meet its requirements in full. There are a number of examples of recent developments achieving or offering affordable housing percentages in excess of the existing 35% threshold which demonstrate a higher threshold can be achieved. Further analysis of the matters summarised above, and the overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p> <p>Further information regarding the viability of common typologies tested is set out in detail within the Housing Background Paper. In summary, the background paper sets out that the most common site types within the Council's housing pipeline are site including existing retail, industrial and cleared land, as being the most common site types within the housing trajectory making up over 62% of projected completions, and only 7.5% of housing completions are projected to be on existing office space.</p> <p>Overall, the Whole Plan Viability Assessment results show that 77% of the models tested can viably provide 45% affordable housing within BLV 2, 3 and 4 (this includes retail, industrial and cleared land respectively). This figure reduces to 70% of models being viable at 45% affordable housing, when the BLV 1 (existing office space) is included, and does show a more challenging viability picture due to the higher existing use values of office space. However, as stated above, only a small proportion of the Council's housing pipeline is on existing office space.</p> <p>In addition, where sites are generating high levels of income and where existing buildings optimise use of the site which is the case for many existing office uses, landowners are clearly far less likely to release land for development, and these sites are very unlikely to come forward for development. It would be unrealistic the base the boroughs viability position on one BLV which illustrates a more challenging position, and makes up a small proportion of projected housing completions.</p> <p>In relation to build costs, the costs modelled are consistent with BCIS data, which are based on tenders submitted for live developments. The use of BCIS data is advocated by the PPG.</p>	

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						<p>track level and resolving to defend a commercially lower affordable housing offer (which could be less than the current 35% threshold). It will also almost certainly result in many developers deciding not to invest in the delivery of housing in Wandsworth, reducing housing delivery in the borough and London wide.</p> <p>02.2.9 For the relevant evidence base, the Wandsworth Housing Needs Assessment 2024 (WHNA) sets out that 60% of the overall housing requirement is for social rent homes. We note this has been introduced through the requirements of the Regulation 19 plan, and additionally raise the concern that wider documents (such as the London Plan) must be balanced with the findings of WHNA – the identified mix within such wider documents recognises the balance of viability and alternative benefits a scheme may provide, which may limit the possibility for a very high percentage of affordability delivered. We believe the Council has not balanced the findings of the WHNA with wider policy implications, as well as environmental implications (i.e. the recent impacts of recession, and financial stagnancy, upon the development industry) which can cause, overtime, fewer residential tenures and affordable housing across those tenures being built during an increasingly challenging time.</p> <p>02.2.10 We also note that the Housing background paper at section 9 includes a summary of the local housing supply position and that the Borough via the latest AMR demonstrates 7 years worth of housing supply over the next 5 years (delivering at least an expected 30,058 homes against a housing target of 24.213 over the same period). And at paragraph 9.4, states: 9.4 In light of the above, it is clear that there remain ample development opportunities within the Borough to meet short-, medium- and long-term housing requirements and that, as would be expected, these will be identified proactively and progressively through subsequent Local Plan cycles (in tandem with London Plans). The Council routinely monitors its housing supply in the context of its housing requirement and will continue to make this information available to inform the next steps of the Local Plan Partial Review.</p> <p>02.2.11 Table 7 included in the Housing Background Paper includes only 6 examples over a period of 7 years that delivers in excess of 35% affordable housing and only one of these examples includes in excess of 45% affordable housing (and this was the redevelopment of an existing Peabody estate renewal). Noting also that one of the other examples is still an unresolved planning application (Gasholder site).</p> <p>02.2.12 We are also concerned that the viability evidence which has been prepared to support the Reg 19 Draft Local Plan is insufficient to determine the potential effects on the viability of development.</p> <p>02.2.13 The Viability Assessment prepared by BNP Paribas Real Estate (“BNPP report” or “BNPPRE”) (August 2024) provides an updated evidence base for the proposed amendments to the Policy L23 and notes. • The results do not point to any particular level of affordable housing that a majority of schemes can viably deliver.</p>		<p>In relation to finance rates, the consultants BNPP have sought to adopt a level that is consistent with current trends, the rate of finance is consistent with rates applied in financial viability assessments submitted in support of live applications and when considering the Bank of England base rate, which has been steadily reducing over the past year, with the rate currently at 4.5% and reports that this is likely to decrease further.</p> <p>In relation to the number of typologies 48 different typologies have been tested, including a mix of small sites, student, extra care etc. These typologies were based on the previous viability assessment carried out for the adopted Local Plan which was considered acceptable as part of the previous Local Plan examination, and this approach is considered acceptable as per the PPG which states; “A typology approach is a process plan makers can follow to ensure that they are creating realistic, deliverable policies based on the type of sites that are likely to come forward for development over the plan period”, The Council therefore consider the typologies tested to include a suitable mix of likely sites coming forwards within the local plan period.</p> <p>The consultants that carried out the viability testing work across London within the viability industry and have extensive knowledge and experience within viability.</p> <p>In relation to current market conditions, although there are immediate challenging conditions within the development industry, solutions from the GLA including their recent Practice Note have clearly set out that this is aimed at providing a short-term solution to the delivery of housing. As Local Plan periods are required to be a minimum of 15 years it is highly important to consider the longer-term trends. Although there have been recent short-term challenges seen within the development industry, it would be unrealistic to set affordable housing levels purely on immediate trends. It is important to consider recent past trends such as COVID-19 where build out rates suddenly dropped but then recovered quickly in areas such as Wandsworth.</p> <p>Further analysis of the viability assessment can be found in the Whole Plan Viability Assessment and Housing Background Paper.</p>	

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						<p>• Also that the BNPP report indicates that the most viable scenarios where sites have the lowest BLV cannot be brought forward for development via policy nor there is little the Council can do to encourage the 'right' type of sites to come forward, without further delay to the delivery of residential due to viability assessments. And that if owners have options to bring sites forward for uses other than residential (or residential – led mixed use), then the delivery of affordable housing may therefore need to be tempered in lower value areas to avoid land being brought forward for non-residential uses.</p> <p>02.2.14 These extracts are not a glowing endorsement of the approach taken by the Council with regards to viability and point to a clear recognition that the policy approach will cause significant challenges to new development coming forward.</p> <p>02.2.15 In respect of the approach taken to the analysis, firstly Downing are concerned the inputs and assumptions adopted by BNPPRE are not realistic and are not supported by proportionate evidence.</p> <p>02.2.16 Downing's extensive long-term experiences, present day out turn construction costs and more recent processes to raise both equity and debt are at odds with most of the key assumptions made in the BNPP Report. Specifically, the following is noted:</p> <ul style="list-style-type: none"> • Build Costs - The adopted build costs (£2,873/m2) are considered to be unrealistically low for high rise PBSA development. The database used by BNPPRE holds very little data on these types of scheme and cannot therefore be relied upon. The costs associated with the construction of Downing's development at Armoury Way in LBW are estimated to exceed £3,500 /m2 excluding abnormal costs. • Abnormal Costs – The exclusion of abnormal costs is wholly unrealistic for brownfield development in London. These costs have no impact on existing use values and should not therefore be excluded. The costs associated with abnormal at Downing's development at Armoury Way in LBW have increased total construction costs by c.20%. To put this in context, the financial impact of the abnormal is in excess of the cost of delivering 15% Affordable Housing. • Finance Costs – The finance costs adopted (6.5%) are unrealistically low. The cost of development finance has increased substantially in recent years due: i) increases in interest rates and the returns that can be achieved on low or entirely risk free investments; ii) increases in the risk premium associated with funding development. <p>02.2.17 The viability testing conducted by BNPPRE clearly seeks to illustrate the most optimistic potential viability scenario. It is however confirmed in national policy that it is not appropriate for policies requirements to be set at the margins of viability (PPG ID: 25-019-20190901). This approach risks development becoming stalled.</p> <p>02.2.18 Our analysis illustrates that where the above inputs are adjusted to more realistic levels the output of the viability study results would change significantly. This evidences the importance of ensuring assessment inputs are reasonable, supported by proportionate evidence, and/or the application of a significant viability buffer to the results of the testing conducted using more optimistic inputs.</p>			

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						<p>02.2.19 Secondly, insufficient scenarios and typologies have been tested to draw any useful conclusions.</p> <p>02.2.20 Thirdly, the outputs of the viability study have clearly not been verified against the recent findings of local planning application stage viability assessments and/or any actual case study schemes informed by more detailed up to date assessment of design efficiencies, construction costs and achievable values.</p> <p>02.2.21 Finally, the results of the viability assessment do not appear to have been sense checked against any market indicators. For example, it has been widely reported that as a result of weakened market conditions housing delivery is at unprecedented lows in London. The GLA's Datahub illustrates that just 31,909 new homes were started in 2023/24 in London which is less than half needed and substantially below the 88,000 homes allocated to London via the new standard methodology. In LBW, housing starts are down by over 70% compared to 2021/22.</p> <p>02.2.22 The results of the BNPP report indicate that many forms of development should be viable with 45% affordable housing. This is clearly out of kilter with actual market conditions. Again, the GLA Datahub shows an average of 22% affordable housing being delivered in schemes which started in 2023/24. This further suggests the methodology used in the BNPP report needs to be carefully reviewed</p> <p>02.2.23 Whilst Dowling understands the importance in delivering genuinely affordable housing tenures, the proposed 45% affordable threshold requirement (fast-track), where most London Borough's recognise the 35% (and noting the recently adopted 35% fast-track for Wandsworth) will significantly impact on the delivery of housing.</p> <p>RESPONSE</p> <p>REJECT HIGHER THRESHOLD FOR FAST-TRACK AND REVERT TO POLICIES IN LINE WITH THE ADOPTED LONDON PLAN H5.</p>			
46	James Stevens obo Home Builders Federation [See also Row 40, 125 and 199]	LP23		N		<p>Policy LP23 – Affordable Housing (Strategic Policy)</p> <p><u>The revised policy is unsound because it is unjustified. It is also contrary to London Plan policy in places and contrary in places to national policy.</u></p> <p>The policy is unjustified in the context of London's deteriorating level of housing supply. It is the fall in supply London wide which is fuelling the crisis in temporary accommodation and homelessness. The remedy is not to try and extract higher proportion of affordable</p>	We have urged the Mayor to simplify fast-track by first lowering the thresholds required, being less explicit on tenure and unit mix and prioritizing delivery. For Wandsworth, at the very least, it should go no further than the 35% and tenure mix specified in the London Plan (policies H5 and H6	Conformity The Council has developed its proposed policy approach to be in general conformity with the London Plan, including through retention of a 50% strategic target and a Fast Track Route, whilst incorporating additional features justified on the basis of local circumstances. The Housing Background Paper sets out examples of other London-based authorities who have adopted similar features into affordable housing policies whilst remaining in general conformity with the	

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						<p>homes - e.g. half of all dwellings as expected by this policy – but to enable residential schemes to progress to ease the housing market.</p> <p>Paragraph 17.10 explains why the Council considers it necessary to revise this policy of its recently adopted local plan (adopted in 2023). The housing crisis in London is a grievous one, aggravated by the steep decline in completions across London since the current London Plan was adopted. This decline is expected to worsen as approvals and starts for new dwellings are also in steep decline.</p> <p>In January 2024 the Government published its review of the London Plan (London Plan Review: Report of Expert Advisers: MHCLG, January 2024). This found that on average London had provided an average of 37,200 net additional homes a year since the first year of the London Plan – 2019/20 – against a London Plan target for 52,200dpa. The consequence of this is now a need for London to provide an average of 62,300 homes a year until the end of the London Plan in 2028/29 if the overall target is to be achieved. This is likely to represent a significant struggle as the number of dwellings being approved fell from 89,000 in 2018/19 to 40,200 in 2022.23 (see London Plan Review: Report of Expert Advisers, MHCLG, 15 January 2024).</p> <p>It is not a coincidence that the fall in completions and approvals has coincided with significant changes in the global economic situation including rising costs associated with construction and changes in regulation, rendering the London Plan's 'threshold approach' (Policy H5) unworkable and out-of-date. The view of the development community is that the evidence supporting the London Plan policies, especially those related to affordable housing, were formulated in a far more buoyant but no longer representative period (2015-16) and no longer reflects the realities of development in London in 2025. It is the considered view of the residential developer community that the London Plan threshold policy is no longer workable and represents one of the three chief barriers to housing delivery in the Capital. The other two being: a) the related issue of the reduced ability/willingness of registered providers to contract with housebuilders to acquire S106 affordable homes, which we will discuss later in relation to this policy; and b) the effect of changes in regulation relating to fire safety including the role of the Building Safety Regulator.</p> <p>The Mayor of London is aware of the challenges with delivery. In response, he has issued Housing and Planning Practice Note in December 2024 advising the London boroughs, among other things, to adhere to the 35% threshold approach in the London Plan. We will refer to this in more detail later.</p> <p>Data on delivery and approvals</p> <p>Housing delivery in London is faltering to a significant degree.</p> <p>The GLA's Residential Dashboard provides details on approvals, starts and completions</p>	<p>Our members have found it difficult to attract registered providers (RP) to acquire S106 affordable homes, given the financial and regulatory constraints facing the sector, and this is especially true with social rent. The rental yields are too low. We would advise instead that the Council allows for the maximum flexibility and species no more that 30% social rent, with the remaining 70% to be intermediate products</p> <p>However, it is unlikely that even this will work as a policy in the current economic period. We would go further and advise the Council to embrace a 'cascade' mechanism, whereby the applicant, after exercising his/her best endeavour to contract with an RP to sell the affordable homes, can alter the tenure mix to provide the type of homes that could sell, including, the potential for the entire affordable housing element to be provided as 'discounted market sale' (low-cost market homes). The Council should align with the London Plan threshold approach and allow for the maximum flexibility in terms of the tenure mix of the affordable housing element</p> <p>The Council should align with the London Plan threshold approach and allow for the maximum flexibility in terms of the tenure mix of the affordable housing element</p>	<p>London Plan. Further analysis on conformity with the London Plan is set out in the Housing Background Paper.</p> <p>Policy Approach</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The Housing Needs Assessment identifies an extremely high need for affordable housing across the plan period, up to 23,600 affordable homes, a majority of which are needed for social rented housing. As set out in the Housing Background Paper, there are strong social and economic imperatives to plan to meet this need.</p> <p>The Council has specifically designed the policy to ensure it is effective and deliverable, as demonstrated through the evidence base. In particular, the Whole Plan Viability Assessment demonstrates that a significant number of development typologies would be viable at a 45% threshold, which is the threshold required under the Council's Fast Track Route. As set out in the Housing Background Paper, there is a strong correlation between the most viable typologies and the types of sites expected to contribute to the Borough's long-term housing supply, such that there can be overall confidence in the policy being deliverable for a significant proportion of developments. The policy also retains a Viability Tested Route which means that developments which cannot maintain viability whilst meeting the requirements of the policy can still receive planning permission. The Council also considers it important that deliverability is evaluated across a plan period and as such that it is important to avoid giving disproportionate weight to short-term market conditions when there is a fair and evidenced expectation that market conditions will improve across the plan period. For these reasons, the Council considers there to be no likelihood of the proposed policy having a materially negative impact on local housing supply or deliverability and considers the policy to provide an effective and proportionate mechanism for addressing developments which cannot meet its requirements in full. There are a number of examples of recent developments achieving or offering affordable housing percentages in excess of the existing 35% threshold which demonstrate a higher threshold can be achieved. Further analysis of the matters summarised above, and the overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p>	

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						<p>for London. We have used 2019/20 as the base year to correspond to start date in the London Plan. The data can be accessed here: https://data.london.gov.uk/dataset/residential-starts-dashboard . Some questions have been raised about the accuracy of this data (see the note on page 6 of the Government's Review) but it is reasonably accurate indicator of the general situation.</p> <p>Completions</p> <table border="1"> <thead> <tr> <th>Year</th> <th>Completions</th> <th>Target</th> <th>Percentage of target</th> </tr> </thead> <tbody> <tr> <td>2024/25</td> <td>1,793</td> <td></td> <td>0%</td> </tr> <tr> <td>2023/24</td> <td>32,582</td> <td>52,287</td> <td>62%</td> </tr> <tr> <td>2022/23</td> <td>34,942</td> <td>52,287</td> <td>67%</td> </tr> <tr> <td>2021/22</td> <td>38,382</td> <td>52,287</td> <td>73%</td> </tr> <tr> <td>2020/21</td> <td>32,956</td> <td>42,388</td> <td>78%</td> </tr> <tr> <td>2019/20</td> <td>32,752</td> <td>42,388</td> <td>77%</td> </tr> </tbody> </table> <p>Approvals</p> <table border="1"> <tbody> <tr> <td>2019/20</td> <td>66,892</td> </tr> <tr> <td>2020/21</td> <td>63,652</td> </tr> <tr> <td>2021/22</td> <td>71,473</td> </tr> <tr> <td>2022/23</td> <td>46,881</td> </tr> <tr> <td>2023/24</td> <td>42,739</td> </tr> </tbody> </table> <p>Starts</p> <table border="1"> <thead> <tr> <th>2019/20</th> <th>2020/21</th> <th>2021/22</th> <th>2022/23</th> <th>2023/24</th> <th>2024/25</th> </tr> </thead> <tbody> <tr> <td>34</td> <td>31</td> <td>34</td> <td>29</td> <td>4</td> <td>-4</td> </tr> <tr> <td>5,786</td> <td>4,463</td> <td>2,011</td> <td>3,861</td> <td>5,900</td> <td>353</td> </tr> <tr> <td>-9</td> <td></td> <td></td> <td>1</td> <td>494</td> <td>0</td> </tr> <tr> <td>43,739</td> <td>39,071</td> <td>40,496</td> <td>48,089</td> <td>25,511</td> <td>1,946</td> </tr> <tr> <td>49,550</td> <td>43,565</td> <td>42,541</td> <td>51,980</td> <td>31,909</td> <td>2,295</td> </tr> </tbody> </table> <p>Although the data for 2024/25 is either unavailable or possibly provisional, the overall trend is apparent: a precipitate fall across all three indices. What is especially alarming is the steep fall in approvals. As a rule of thumb you need a third more in approvals relative to the target to ensure that the target can be met. In the case of the London Plan, one would expect approvals to be around the 80,000 a year mark to ensure that the target of 52,000 a year can be achieved. This figure would need to rise to around 90,000 approvals</p>	Year	Completions	Target	Percentage of target	2024/25	1,793		0%	2023/24	32,582	52,287	62%	2022/23	34,942	52,287	67%	2021/22	38,382	52,287	73%	2020/21	32,956	42,388	78%	2019/20	32,752	42,388	77%	2019/20	66,892	2020/21	63,652	2021/22	71,473	2022/23	46,881	2023/24	42,739	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	34	31	34	29	4	-4	5,786	4,463	2,011	3,861	5,900	353	-9			1	494	0	43,739	39,071	40,496	48,089	25,511	1,946	49,550	43,565	42,541	51,980	31,909	2,295		<p>The Council has had regard to the implications of the Accelerating Housing Delivery Practice Note (December 2024) in its Housing Background Paper. It notes that the Practice Note is not part of the London Plan nor planning policy.</p> <p>In relation to affordable housing tenure, the London Plan (Policy H6) identifies that a minimum of 30 per cent should be low-cost rented homes (effectively social rented), 30 per cent intermediate products and the remaining 40 per cent based on identified need. The Council's proposed policy satisfies these general parameters. The proposed tenure split reflects the extremely high need locally for social rented homes (identified through the Housing Needs Assessment) and the corresponding need to prioritise this tenure. The Council considers this tenure split to be justified and effective in the context of evidence, including its Housing Needs Assessment. The Council does not consider it appropriate to include a tenure split which prioritises a form of affordable housing which does not best meet local need. Further information on the relationship between affordable housing tenures and local need is set out in the Housing Background Paper.</p> <p>The Council does not consider there to be any fundamental local or long-term challenges in attracting Registered Providers to acquire affordable housing under the proposed tenure split, and has, in any case, provided significantly flexibility for this event as part of Part A1 which identifies ways forward where it has not been possible to secure a provider.</p> <p>Viability</p> <p>The points are noted in relation to the delivery of intermediate rent and shared ownership housing, however, it is important to note the following point within the emerging policy and to read paragraph 17.17 as a whole, as Shared Ownership dwellings are capable of being considered acceptable on viability grounds. The Council would note the importance of considering the fact that grant rates for London Living Rent (LLR) have recently increased, making this form of tenure in many cases as viable if not more viable than shared ownership housing. The Council therefore considers the justification for this element of the policy to be clear and effective.</p> <p>Overall, the Whole Plan Viability Assessment results show that 77% of the models tested can viably provide 45% affordable housing within BLV 2, 3 and 4 (this includes retail, industrial and cleared land respectively). This figure reduces to 70% of models being viable at 45% affordable housing, when the BLV 1 (existing office space) is included, and does show a more challenging viability picture due to the higher existing use values of office space. However, as stated above, a small proportion of the Council's housing pipeline is on existing office space.</p>
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The actual figures since 2019/20 – the first year of the current London Plan- are provided below:</p> <table border="1"> <thead> <tr> <th>2019/20</th> <th>2020/21</th> <th>2021/22</th> <th>2022/23</th> <th>2023/24</th> <th>2024/25</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>19.93%</td> <td>16.73%</td> <td>20.17%</td> <td>26.38%</td> <td>26.65%</td> <td>19.44%</td> <td>24.10%</td> </tr> <tr> <td>79.87%</td> <td>82.78%</td> <td>77.84%</td> <td>73.24%</td> <td>72.49%</td> <td>80.81%</td> <td>75.50%</td> </tr> <tr> <td>0.09%</td> <td>0.10%</td> <td>0.00%</td> <td>0.05%</td> <td>0.02%</td> <td>-0.24%</td> <td>0.03%</td> </tr> <tr> <td>0.11%</td> <td>0.38%</td> <td>2.00%</td> <td>0.33%</td> <td>0.83%</td> <td>0.00%</td> <td>0.36%</td> </tr> </tbody> </table>	Year	Completions	Target	% of target	2024/25	30		0%	2023/24	2,873	1,950	147%	2022/23	2,383	1,950	122%	2021/22	1,143	1,950	59%	2020/21	2,009	1,812	111%	2019/20	1,384	1,812	76%	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	481	936	803	505	151	564	2,776	3,901	2,880	1,803	485	1,548		-1	-5	-1	3		3,257	4,836	3,678	2,307	639	2,112	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	Total	19.93%	16.73%	20.17%	26.38%	26.65%	19.44%	24.10%	79.87%	82.78%	77.84%	73.24%	72.49%	80.81%	75.50%	0.09%	0.10%	0.00%	0.05%	0.02%	-0.24%	0.03%	0.11%	0.38%	2.00%	0.33%	0.83%	0.00%	0.36%		<p>In addition, where sites are generating high levels of income and where existing buildings optimise use of the site which is the case for many existing office uses, landowners are clearly far less likely to release land for development, and these sites are very unlikely to come forward for development. It would be unrealistic the base the borough's viability position on one BLV which illustrates a more challenging position, and makes up a small proportion of projected housing completions.</p> <p>Tenure</p> <p>In relation to tenure, social rent is able to be grant funded, where as other forms such as London Affordable Rent are not grant eligible. In addition, as part of the accelerated funding route grant levels for social rent have been increased. The Council have not experienced any recent issues with RPs seeking to offer LAR in place of social rented dwellings.</p> <p>In relation to the intermediate tenure, there is sufficient flexibility provided within the supporting text to allow applicants to justify deviation from the Council's preferred mix if this is required.</p> <p>The Council have been regularly engaging with the GLA throughout the policy writing process and the tenure split proposed of 70:30 Social Rent to Intermediate tenure has not been raised as a conformity issue.</p> <p>Further analysis of the viability assessment can be found in the Whole Plan Viability Assessment and Housing Background Paper.</p> <p>Small Sites</p> <p>Requiring an affordable housing contribution from small sites is considered to be justified on the basis of the high local need for affordable housing. The construction of the policy is similar to a large number of other London-based Local Plans which have also been justified on the basis of high local need. There is clear precedent across London that high local need may justify an approach which does not accord with national policy relating to small site affordable housing contributions.</p> <p>The value of the proposed small site contribution has been calculated using a recommended formula derived from the Whole Plan Viability Assessment. The derivation of the value, and the components of this formula, is set out clearly in the Housing Background Paper.</p> <p>It is the Council's intention to apply any small sites viability assessment process proportionately, in light of the need to avoid delays or administration that is</p>
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						<p>As can be seen, the best proportion of affordable housing achieved in Wandsworth against the current London Plan (in operation since 2019/20) was a figure of 26.55% in 2023/24. All things remaining equal, and not accounting for future regulatory cost increases, such as the Building Safety Levy, the Future Homes Standard, and increased water connection fees, it is highly unlikely that the Council's expectation that half of all homes on a development can be provided as affordable homes (and ignoring the requirement that 70% should be provided as social rent) can be achieved. This is also true for Wandsworth's threshold hurdle of 45%.</p> <p>We accept that the past is not necessarily an indicator for what might need to happen in the future. Political priorities change. However, the evidence tends to indicate that increasing the threshold from 35% to 45% is a decision that heads in the opposite direction to other economic indicators in London. The proposed policy is unlikely to yield a higher number of affordable dwellings; it is more likely to delay development. Wandsworth is performing much better in delivery terms compared to most other London boroughs, but the signs are there that the market is faltering. Starts in Wandsworth, as in the case of London generally, are falling as the data from the GLA dashboard indicates:</p> <table border="1"> <thead> <tr> <th>2019/20</th> <th>2020/21</th> <th>2021/22</th> <th>2022/23</th> <th>2023/24</th> </tr> </thead> <tbody> <tr> <td>-12</td> <td>650</td> <td>1,036</td> <td>312</td> <td>16</td> </tr> <tr> <td>3,909</td> <td>1,264</td> <td>3,616</td> <td>2,234</td> <td>1,480</td> </tr> <tr> <td>3,897</td> <td>1,914</td> <td>4,652</td> <td>2,546</td> <td>1,496</td> </tr> </tbody> </table> <p>The figure for 2023/24 is the lowest in Wandsworth since 2012/13.</p> <p>Our advice, therefore, would be for the Council not to continue with this draft policy but to reflect the advice in the GLA's Housing and Planning Practice Note, and not treat the London Plan 35% threshold as a barrier, but enter negotiations over lower levels of affordable housing constructively.</p> <p>HBF recognises the need to support the supply of affordable homes, hence our joint statement with the National Housing Federation, calling on the Government to provide a long-term rent settlement for the RP sector and to provide clarity of the Affordable Homes Programme. However, if these measures are supported by the Government, the effect of these interventions will take at least two years to work through before RPs are sufficiently confident against to invest in buying S106 affordable homes.</p> <p>Does the policy conform with: a) the London Plan policy and; b) the recent Housing and Planning Practice Note?</p> <p>The revised policy sets a requirement for half of all homes to be affordable, but with a threshold of 45% to allow applicants to avoid the viability tested route, The Council's</p>	2019/20	2020/21	2021/22	2022/23	2023/24	-12	650	1,036	312	16	3,909	1,264	3,616	2,234	1,480	3,897	1,914	4,652	2,546	1,496		<p>disproportionate to the size of site or wider costs of delivering the site. In taking a simple, evidence-based approach to establishing the value of the small site contribution, and applying a proportionate viability assessment process for those sites which cannot viably provide that contribution, the Council does not consider that there will be a material impact on small sites' delivery in the Borough.</p> <p>Further information on the application of the small sites viability assessment process would be set out in a planned Affordable Housing SPD.</p> <p>All financial contributions collected towards affordable housing, whether payments in lieu or collected as part of the proposed Small Sites contribution, would be used to fund the acquisition or delivery of affordable housing in Wandsworth Borough. The Council has an effective track record in building affordable housing, and has ongoing major programmes including Homes for Wandsworth.</p> <p>Vacant Building Credit</p> <p>Vacant Building Credit offers an incentive to building on previously developed land. Developable land in Wandsworth is almost exclusively previously developed. There is therefore no need for an incentive to encourage previously developed land to be delivered and the inclusion of Vacant Building Credit would lead to an unjustified reduction in affordable housing delivery which is harmful to the need to maximise affordable housing delivery in the Borough.</p> <p>The Council's approach is consistent with that taken in its adopted Local Plan, which found the disapplication of Vacant Building Credit to be justified and sound.</p>
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						<p>approach is a variation on the London Plan, but with a steeper hurdle.</p> <p>The policy is unsound because it is contrary to the London Plan. The London Plan sets a threshold for 35% in policy H5. The recently published GLA Housing and Planning Practice Note (December 2024) also advises boroughs against deviating from the London Plan owing to the fall in the level of housing completions and starts in London. As the Practice Note (PN) observes at paragraph 1.2:</p> <p>In view of current market conditions, the GLA is bringing forward additional measures to support housing delivery under the Mayor's planning and housing powers. This practice note focuses on short-term delivery and forms part of wider approaches established through the London Plan and the Mayor's Housing Strategy. It also sits alongside emerging work to implement the commitments in the Mayor's 2024 Manifesto including the delivery of council homes, rent controlled Key Worker Living Rent Homes, and the City Hall Developer, as well as work towards a new London Plan.</p> <p>In Section 3 of the PN the GLA recognises that developers should be incentivised to meet fast-track route (FTR). To this end the PN calls on the London boroughs not to add additional criteria. As the PN states at paragraph 3.2:</p> <p>Given the benefits of the FTR in terms of delivering higher levels of affordable housing, providing additional certainty to applicants, LPAs and the Mayor, and speeding up the planning process, it is important that applicants are incentivised to follow the FTR and are not required to undertake viability testing unless relevant criteria are not met.</p> <p>We consider this to be the right approach in this uncertain economic period. The starting position for all developers is to try and achieve fast track, although this does not address the central problem which is that the fast-track route is now out of reach for all residential developers owing to the regulatory and economic changes experienced by the development sector. We have urged the Mayor to simplify fast-track by first lowering the thresholds required, being less explicit on tenure and unit mix and prioritizing delivery. For Wandsworth, at the very least, it should go no further than the 35% and tenure mix specified in the London Plan (policies H5 and H6).</p> <p>Additionally, the London Plan specifies a tenure mix for the affordable housing element in Policy H6. This specifies 30% low-cost rent, which can include social rent and affordable rent, 30% intermediate, and the remaining 40% at the discretion of the local authority. Instead, the Council is proposing 70% social rent. While this adheres to the London Plan, social rent is a tenure type that is harder to make work from a viability point of view and is certainly much less popular as a tenure type for registered providers. Our members have found it difficult to attract registered providers (RP) to acquire S106 affordable homes, given the financial and regulatory constraints facing the sector, and this is especially true with social rent. The rental yields are too low. We would advise instead that the Council allows for the maximum flexibility and species no more than 30% social rent, with the</p>			

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						<p>remaining 70% to be intermediate products.</p> <p>However, it is unlikely that even this will work as a policy in the current economic period. We would go further and advise the Council to embrace a 'cascade' mechanism, whereby the applicant, after exercising his/her best endeavour to contract with an RP to sell the affordable homes, can alter the tenure mix to provide the type of homes that could sell, including, the potential for the entire affordable housing element to be provided as 'discounted market sale' (low-cost market homes).</p> <p>Is what is being proposed viable?</p> <p>As with the evidence that informed residential development viability for the current version of the local plan, the borough exhibits a range of values with some types of schemes on some types of existing land use being much less viable than others. As the report acknowledges in the Key Findings section at the opening of the report (paragraph 1.9):</p> <p>Given the diversity of development types across a borough such as Wandsworth, a small number of development typologies will always find it challenging to deliver any level of affordable housing due to high existing use values. However, due to this relationship between scheme value and existing use value, these types of development would be highly unlikely to come forwards for residential development as the returns from existing uses would outweigh the benefits of redevelopment. That said, the outputs of our appraisals indicate that a majority of development typologies we have tested are able to support 40% to 45% affordable housing with a tenure mix of 70% social rent and 30% intermediate. Given that sites unable to achieve these percentages would be a minority of development typologies likely to come forward, a target seeking 40% to 45% affordable housing would align with the aspiration of the NPPF for policies to viable in a majority of cases without the need to undertake significant volumes of viability testing at the development management stage.</p> <p>The report tests various scenarios. These are set out at paragraph 6.2 of the report. Of these scenarios, the one that aligns most closely to the proposed policy is the one that models up to 50% affordable housing, with a tenure mix of 70% Social Rent and 30% London Living Rent. The scenario that models 30% shared ownership, included in the body of the report, cannot be relied upon as this form of tenure is not explicitly supported by the Council (see paragraph 17.17).</p> <p>The Council's proposed policy states that it prefers the 30% intermediate housing element to be provided as a rented tenure (see LP23, part 2) so this scenario is the one most appropriate to consider. The results are provided in Appendix 10 (page 167 onwards).</p> <p>The Council should reflect upon these results carefully. In almost all instances, development would be unviable, except where cleared land is involved, which is hardly likely to be a typical scenario. The secondary retail and industrial land uses are a bit more</p>			

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						<p>viable, but these are hardly land types that would be typically available for residential development in view of the protections on these activities in the London and local plans (especially industrial). As the report acknowledges, lower value areas are very badly affected.</p> <p>What is apparent from a survey of the results, both in tables 6.10 onwards and in Appendix 10, is that a lower level of affordable housing – for example 20-25% - is more viable in more scenarios, indicating that this is the level at which policy should be pitched to ensure that schemes are not hopelessly bogged-down in viability assessments.</p> <p>The Council should align with the London Plan threshold approach and allow for the maximum flexibility in terms of the tenure mix of the affordable housing element.</p> <p>Accelerating Housing Delivery: GLA Housing and Planning Practice Note</p> <p>The GLA's Practice Note (PN) includes several recommendations to help improve the rate of delivery in London. We recommend that the Council considers this and reflects the advice in a revised policy.</p> <p>Among the recommendations are:</p> <ul style="list-style-type: none"> • Community Infrastructure Levy instalment and 'payment in kind' policies to assist development cashflow and encourage the provision of onsite infrastructure. • Accepting a greater number of social rent homes in exchange for fewer affordable homes overall. The PN refers to increasing social rent housing delivery by allowing 27% social rent as an alternative to 35% affordable housing. Although Wandsworth is increasing the overall requirement to 45%, we recommend it aligns with the London Plan and the advice in the PN. • Where an estate regeneration scheme provides half of the additional habitable rooms within the proposal as affordable housing above the re-provided affordable housing floorspace, the GLA will consider not requiring mid-term or late-stage viability reviews. This practice should be supported by the Council. • Accepting other types of intermediate rental tenures. The Council should allow the maximum flexibility on the tenure mix of the intermediate element. <p>Tenure</p> <p><u>The proposed tenure split is unsound because it is unjustified and contrary to the London Plan.</u></p> <p>Although the viability appraisal might conclude that the tenure proposed – 70% social rent and 30% affordable rent – is viable in several cases, it does not follow that this is a tenure mix that RPs would be willing to take on. As mentioned above, social rent is insufficiently lucrative in terms of its rental yields and so is unattractive to RPs in the current period. We recommend that the Council has a discussion with RPs to understand the mix of tenures it</p>			

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						<p>would be willing to procure.</p> <p>The GLA PN makes the following observations at paragraphs 3.7 and 3.8 as to the tendency for some London boroughs to set a higher threshold:</p> <p>3.7 However, a small number of boroughs have proposed local plan affordable housing policies with a site specific requirement that is higher than the 35 per cent private land threshold in Policy H5. Where such policies have been adopted, the borough may require the applicant to follow the VTR even where the application meets the relevant London Plan criteria for following the FTR. Although intended to secure a higher level of affordable housing, where not supported by robust viability evidence, this approach can disincentivise applicants from following the FTR, slow down the planning process and require additional resourcing to assess the application. It can also result in lower levels of affordable housing being secured or reduce the effectiveness of viability reviews.</p> <p>3.8 This approach risks the successful implementation of the London Plan threshold approach which is a matter of strategic concern for the Mayor. This has been raised by the GLA and will continue to be raised as an issue of general conformity with the London Plan at local plan consultations and inquiries.</p> <p>As the PN observes, this practice can be counterproductive. It removes the incentive for housebuilders to try and meet the 35% threshold. By insisting on a higher threshold rate – one that no scheme can achieve - the Council will force every applicant down the time-consuming viability tested route. This consumes the limited time of officers in development management – a function already badly over-stretched – but it also invariably, as the GLA observes, results in even lower levels of affordable housing once the financial details of the scheme are scrutinised in much greater detail. Trying to maximise the number of affordable homes (and the social rent tenure) will be at the expense of maintaining a steady supply of schemes being approved and built out.</p> <p>We would like to see the Council embrace schemes that provide entirely discounted market sale. This is an accepted tenure in national planning policy. This would enable such schemes to benefit from the Fast-Track route through planning.</p> <p>The Council should align with the London Plan threshold approach and allow for the maximum flexibility in terms of the tenure mix of the affordable housing element.</p> <p>Small sites (1-9 dwellings)</p> <p><u>The proposed policy is unsound because it is contrary to national policy.</u></p> <p>The proposed policy will seek affordable housing obligations from minor residential development. The proposed policy is contrary to national policy which exempts minor residential development from contributions to affordable housing. Nor does the London Plan expect contributions to affordable housing from minor development, although it</p>			

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							<p>devolves this matter to the boroughs to decide. The policy seeks a contribution of £50,000 per dwelling instead.</p> <p>We note this conclusion in the Viability Assessment at paragraph 1.9 (page 5):</p> <p>We have tested the viability of development typologies providing fewer than 10 units and the outputs of our appraisals indicate that a contribution equivalent to 10% to 20% affordable housing would be viable in most cases. However, a small number of typologies are not viable with any affordable housing contribution, so a flexible approach will need to be incorporated into any emerging policy to enable these sites in these circumstances to come forward without a contribution.</p> <p>It is apparent from this that not every minor residential development would be able to contribute, but rather than exempting such schemes in accordance with national policy, the Council wishes to force applicants to undertake a detailed viability assessment to prove this. This is time-consuming, costly, and is unlikely to have any beneficial result. In view of the importance of encouraging the delivery of small sites – this being a matter of strategic importance in the London Plan, where small sites are expected to play a critical role in delivering the London Plan housing requirement – 12,000 dwellings a year – it would be more appropriate for the Council to remove this requirement. The current adopted Local Plan does not seek contributions from minor developments.</p> <p>The Government is anxious for the SME housebuilding sector to expand but one of the primary barriers to the growth of this sector is the development management system. The amount of time that SME housebuilders are entangled in development management represents a serious obstacle to delivery. A report by the HBF published in December 2024 (State of Play: Challenges and Opportunities Facing SME Home Builders, 2024-25: HBF, December 2024) which surveyed the state of the SME housebuilding market, identified the two biggest barriers as: a) delays in securing planning permission and discharging conditions; and b) the lack of resources in local planning departments. Any policy measure that forces an SME housebuilder to have to engage with the local authority will add delay to the delivery of housing. The funding model for SME home builders, where they are more dependent on project-by-project finance, carrying little in the way of large cash reserves enabling them to 'weather' delays, means that they are particularly vulnerable to the delays now commonly associated with local authority development management. Half of the SME respondents to the survey said that they had waited longer than a year in the last three years to obtain planning permission. 94% of respondents considered delays in securing planning permission and the discharging of conditions to be the most significant barrier to growth. This is the SME sector's foremost concern for the fifth consecutive year (the survey is conducted annually).</p> <p>As observed above, the number of approvals is falling across London in general but also in Wandsworth. It is necessary to change tack and ease the brakes on development.</p> <p>It is also difficult to know how the Council proposes to spend the affordable housing</p>		

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						<p>monies collected. Although it is unclear in the consultation, we assume the money collected will be directed towards council house building by the Council itself. However, as a report by the HBF in 2024 found, local authorities in England hold £6 billion in unspent S106 obligations. The report found that £817 million had been provided by developers for affordable housing but this was unspent and sitting in local authority bank accounts. Local authorities in major cities with communities at the sharp end of the housing crisis hold the greatest sums of Section 106 monies allocated for affordable housing – with six of the top ten councils with the largest affordable housing sums unspent being in London.</p> <p>Vacant Building Credit</p> <p><u>The proposed policy to disapply the operation of the vacant building credit in Wandsworth is unsound because it is contrary to national policy.</u></p> <p>The Council wishes to disapply national policy relating to the vacant building credit. This is national policy, and the Council should not disapply this through the local plan. The purpose of the vacant building credit is to incentivise the redevelopment of previously developed land for housing. Removing the credit will contribute to poorer rates of residential development in London. This has been demonstrated by London's poor record of housing delivery over the last five years, with completions averaging at 37,000dpa and approvals dropping from 89,000dpa in 2018/19 to just 40,200 in 2022/23 (London Plan Review: Report of Expert Advisers: MHCLG, January 2024).</p>			
47	Giles Reed obo Thinking Works	LP23				<p>What we support:</p> <p>We fully support the proposed changes to the Local Plan, including:</p> <ul style="list-style-type: none"> • 50% of new homes built in the Borough will be affordable housing, • That 70% of new affordable housing being social rented. • That the Local Plan require developments smaller than 10 homes to contribute towards affordable housing. <p>Why do we support this?</p> <ul style="list-style-type: none"> • 75% of our service users issues stem from the lack of affordable, quality housing. Lack of housing removes choice, which means substandard homes can find tenants, and prices charged for poor quality homes is usually exorbitant. Service users routinely feedback to us that after rent is paid, there is no money for food and fuel, and the homes rented are so energy poor that fuel bills are far higher than they should be. Renters are reluctant to complain about substandard housing as there are few protections for them and they risk being evicted and unable to find another home, or find a more expensive one in worse condition. Our most vulnerable residents face high rents and high fuel bills in cold homes. • The lack of affordable, quality housing has been a key issue discussed since I started supporting the fuel poor 17 years ago, and still remains a core issue as fundamental changes, such as those proposed for the Local Plan, have not been made 		Support Noted.	

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							<ul style="list-style-type: none"> Addressing the issue of affordable housing has multiple benefits that will help create, healthy, strong, happy communities where people want to live and work. Wandsworth has a unique opportunity to drive real change that will improve the lives of the many and act as an exemplar for other councils to follow. Now is the time for change, and now is the time for Wandsworth to lead. <p>We are more than happy to provide further information on the issues our service users face because of the lack of affordable housing.</p>		
48	Emily Disken obo BlackRock UK Property Fund [See also Row 20]	LP23					<p>VIABILITY EVIDENCE TO SUPPORT THE REVISED POLICY</p> <p>Paragraph 31 of the NPPF (2024) requires that the preparation and review of all policies is underpinned by relevant and up to date evidence. This should be adequate and proportionate and focused on supporting and justifying the policies concerned considering relevant market signals. LBW has published a Local Plan Viability Assessment dated August 2024 in relation to the Local Plan review.</p> <p>The Viability Assessment tests the ability of development typologies in Wandsworth to accommodate Local Plan policies including the changes proposed through the Local Plan partial review, including the removal of the ability for applicants to apply the 35% fast track route with the application of an increased threshold of 45% and seeking a 70/30 tenure mix in favour of social rent.</p> <p>The Viability Assessment finds that given the diversity of different development typologies across the borough, some developments will find it difficult to achieve the revised affordable housing targets due to high existing use values.</p> <p>Our client's asset currently trades well, with the centre being 88% occupied, as a result of three national multiple retailers recently extending their leases and a number of new lettings to both national and independent retailers. There is clearly a risk that for the Site and other similar development typologies, the revised strategic target of 50% affordable housing and 70/30 tenure split in favour of social rent could mean that the returns from existing uses could outweigh the benefits of redevelopment. This may deter landowners and other parties bringing forward sites for development where there are other clear incentives for redevelopment.</p> <p>In this case, there is an opportunity to bring forward a mixed-use development to help regenerate the wider town centre and deliver significant benefits for the local community including the delivery of much-needed housing and affordable housing, improvements to the townscape function of the area, new public space and playspace, increase urban greening and net increase in biodiversity.</p> <p>Therefore, our client welcomes the retention of the ability to viability test sites which genuinely cannot afford to meet the affordable housing targets within draft Policy LP23 (Affordable Housing) so as not to stymie the redevelopment of sites</p>		<p>Comments Noted.</p> <p>Policy LP23 has been prepared to allow for sufficient flexibility to be applied to developments which cannot viably meet the full requirements of the policy and allows for these developments to receive permission through a Viability Tested Route. In this way, we consider that the policy would not sterilise sites and/or prevent the delivery of other wider planning benefits such as provision of high-quality public space or the creation of new jobs.</p>

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						<p>which can deliver other important benefits such as modern workspace, high-quality public realm and buildings of a high architectural quality expected of such a prominent town centre site.</p> <p>CLOSING</p> <p>Our client is supportive of the delivery of new housing in the Borough, including much-needed affordable housing. The Putney Exchange site occupies a prominent location within the designated Putney Town Centre and could contribute to affordable housing delivery in the Borough as part of a wider mixed-use development which whilst delivering other significant planning benefits.</p> <p>If the proposed amendments to Policy LP23 are adopted, decision-making must have regard to other policies within the adopted Development Plan and other considerations such as the existing use and market considerations. Sufficient flexibility must be retained within the amended policies so as not to sterilise sites and prevent the delivery of other wider planning benefits such as provision of high-quality public space and the creation of new jobs to boost the local economy.</p> <p>We trust that these observations are useful at this consultation stage. We wish to maintain an active role in the engagement process moving forward and look forward to receiving an update as LBW continue to undertake their Partial Plan review.</p>			

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49	John Turner obo Ballymore Group [See also Row 19, 143, 159, 174 and 177]	LP23				<p>Whole Plan Viability (2025)</p> <p>Following on from our comments on the Reg 18 version of the plan we are pleased to see that the Council commissioned the London Borough of Wandsworth: Local Plan Viability Assessment (November 2024) to accompany the Local Plan Regulation 19 Consultation.</p> <p>However, we are concerned that the BNPP (their consultants) report does not give significant weight to the issues facing build costs and market home values there are concerns regarding the values which can be secured for affordable housing within the Borough. This again impacts on the overarching viability of development within LB Wandsworth and the ability to delivery new homes.</p> <p>This concern is already present in the wider market where many conventional housing schemes are stalling or being replaced by other uses such as Purpose-Built Student Accommodation or industrial floorspace. An issue which the Council acknowledges in the new Draft Local Plan through singular policies positions encouraging complementing traditional housing alongside PBSA.</p> <p>In terms of plan-making, the National Planning Policy Framework (NPPF 2023) is clear that the “planning system should be genuinely plan-led” (para 15) and to this end Plans should:</p> <ul style="list-style-type: none"> • “Be prepared positively, in a way that is aspirational but deliverable” (para 15b). • “Contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals” (para 15c). <p>Para 32 goes onto state that “The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals”.</p> <p>Policy LP23 Affordable Housing</p> <p>Whilst we support the desire to deliver affordable housing within the Borough, as stated above we have concerns regarding the realistic chances of success of this approach given</p>	As previously stated above we support the Council in trying to deliver genuinely affordable housing for its residents. However, for the reasons we have set out above we have concerns regarding the delivery of the amended policy and the non-conformity with the London Plan. We would strongly encourage the Council to adopt a consistent approach with the Strategic Policy document to provide clarity to the development process and ultimately encourage delivery of new homes. This is pertinent given the emerging new housing targets for the Borough which are going to place a significant emphasis on the need to deliver.	<p>Comments Noted.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The Housing Needs Assessment identifies an extremely high need for affordable housing across the plan period, up to 23,600 affordable homes, a majority of which are needed for social rented housing. As set out in the Housing Background Paper, there are strong social and economic imperatives to plan to meet this need.</p> <p>The Council has specifically designed the policy to ensure it is effective and deliverable, as demonstrated through the evidence base. In particular, the Whole Plan Viability Assessment demonstrates that a significant number of development typologies would be viable at a 45% threshold, which is the threshold required under the Council's Fast Track Route. As set out in the Housing Background Paper, there is a strong correlation between the most viable typologies and the types of sites expected to contribute to the Borough's long-term housing supply, such that there can be overall confidence in the policy being deliverable for a significant proportion of developments. The policy also retains a Viability Tested Route which means that developments which cannot maintain viability whilst meeting the requirements of the policy can still receive planning permission. The Council also considers it important that deliverability is evaluated across a plan period and as such that it is important to avoid giving disproportionate weight to short-term market conditions when there is a fair and evidenced expectation that market conditions will improve across the plan period. For these reasons, the Council considers there to be no likelihood of the proposed policy having a materially negative impact on local housing supply or deliverability and considers the policy to provide an effective and proportionate mechanism for addressing developments which cannot meet its requirements in full. There are a number of examples of recent developments achieving or offering affordable housing</p>	

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						<p>the current challenging economic circumstances. Regarding Part D of the new draft Policy 23 we consider fails to be in compliance with the Strategic Development Plan – London Plan Policy H5 and the recently issued GLA Planning and Housing Practice Note December 2024.</p> <p>The GLA Planning and Housing Practice Note December 2024 states:</p> <p>2.1 Affordable housing secured through the planning system is estimated to account for half of affordable homes delivered nationally and more in London. As well as helping to address housing need this supports the provision of mixed and inclusive communities which is a key principle in the current and previous London Plans.</p> <p>2.2 The Mayor's policies and other interventions have helped to reverse the significant decline in affordable housing provision in residential developments between 2012 and 2016. Since then, the total number of affordable homes in referable applications approved by the Mayor as a proportion of all homes has increased from 25 to 38 per cent in 2023, and 46 per cent by habitable room. Net affordable housing completions in 2023/24 were at their highest level since 2011/12. The delivery of social and low-cost rent affordable housing for low income households in London has also increased. This is in the context of higher overall housing delivery, with average net residential completions over the last eight years being significantly higher than in the period since 1991.</p> <p>2.3 This has been achieved in large part through the London Plan 'threshold approach' introduced in 2017 and other interventions under the Mayor's planning and housing powers. The threshold approach enables schemes that provide the relevant threshold level of affordable housing to follow the Fast Track Route (FTR). This Has helped to ensure that affordable housing requirements are reflected in land values and sped up the planning process. Developments with a lower level of affordable housing are considered through the Viability Tested Route (VTR) to assess the maximum viable level of affordable housing, subject to reviews which determine whether this can be increased if viability improves over time.</p> <p>We consider that is Wandsworth adopt a higher threshold, schemes which previously would have been considered fast track will be delayed by viability assessments, which in our experience take months to resolve and could ultimately result in the Council losing out on upfront affordable housing, due to the developer unwilling to take the commercial decision to agree the higher fast-track level and resolving to defend a commercially lower affordable housing offer (which could be less than the current 35% threshold).</p> <p>This suggested approach essentially contradicts the original intent of the fast-track policy which sought to incentivise developers to deliver policy compliant levels of affordable housing through simplified determination and review mechanisms.</p> <p>The suggested approach also fails to give due consideration to the current issues</p>		<p>percentages in excess of the existing 35% threshold which demonstrate a higher threshold can be achieved. Further analysis of the matters summarised above, and the overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p> <p>Alongside the findings of the BNPP Whole Plan Viability Assessment, it is important to consider the Council's wider evidence within the Housing Background Paper. In summary, the background paper sets out that the most common site types within the Councils housing pipeline are sites including existing retail, industrial and cleared land, which are the most viable. Summarising the evidence, 77% of the tests carried out on these site types are viable at 45% affordable housing. In addition, these are the most common site types within the housing pipeline, making up over 62% of projected completions, with only 7.5% of housing completions projected to be on existing office space.</p> <p>In relation to the comments, the Council can only consider sites that are submitted for planning and applicants can still use the Viability Tested Route if sites are not viable enough to use the Fast Track Route, however, based on the viability information this would not be applicable to the majority of sites within the housing pipeline.</p> <p>Further analysis of the viability assessment can be found in the Whole Plan Viability Assessment and Housing Background Paper.</p>	

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						<p>prevalent within the wider development industry. To compound the clear viability implications associated the greater provision of affordable homes compared to market housing or amended tenure splits there are also wider issues associated with the delivery of affordable homes.</p> <p>Through our extensive experience in the development market, we are aware that, as with market homes, the value of affordable homes has also been impacted in the past few years. This has been driven by internal costs within the Registered Social Landlords led by inflation as well as a vastly reduced number of Registered Social Landlords actively operating in the market reducing competition.</p> <p>Grant funding has the ability to offset some of the above gaps, notably under the new Affordable Homes Programme (December 2024) recently announced by the Greater London Authority. However, the cyclical nature of the funding means it is difficult to predict and rely upon especially at application stage. This uncertainty is a significant risk when considering whether to proceed towards the delivery of new housing sites.</p> <p>In addition to the issues facing build costs and market home values there are concerns regarding the values which can be secured for affordable housing within the Borough. This again impacts on the overarching viability of development within LB Wandsworth and the ability to delivery new homes.</p> <p>We note that BNP Viability Report which reviews the whole plan and concludes:</p> <p>The results do not point to any particular level of affordable housing that a majority of schemes can viably deliver but the results do indicate that there are some development circumstances in which the emerging policy target of 40% or 50% could be viable and these are secondary retail use, secondary industrial use and backland sites.</p> <p>Also that the BNPP appraisals indicate that the most viable scenarios where sites have the lowest BLV cannot be brought forward for development via policy nor there is little the Council can do to encourage the 'right' type of sites to come forward, without further delay to the delivery of residential due to viability assessments. And that if owners have options to bring sites forward for uses other than residential (or residential – led mixed use), then the delivery of affordable housing may therefore need to be tempered in lower value areas to avoid land being brought forward for non-residential uses.</p> <p>Neither of these extracts are a glowing endorsement of the suggested approach taken by the Council with regards to viability and point to a clear recognition of the challenges facing the development market.</p> <p>As previously stated above we support the Council in trying to deliver genuinely affordable housing for its residents. However, for the reasons we have set out above we have concerns regarding the delivery of the amended policy and the non-conformity with the</p>			

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							<p>London Plan. We would strongly encourage the Council to adopt a consistent approach with the Strategic Policy document to provide clarity to the development process and ultimately encourage delivery of new homes. This is pertinent given the emerging new housing targets for the Borough which are going to place a significant emphasis on the need to deliver.</p> <p>Conclusion</p> <p>Overall, Ballymore supports the Council's ambitions to deliver revisions to the Local Plan which meets the needs of the residents in Wandsworth and safeguards quality of accommodation for existing and future residents.</p> <p>We remain keen to continue working with officers to ensure that the emerging draft policies do not prevent the viable delivery of housing across the Borough, particularly when considering the cumulative impact of the current housing market.</p> <p>We consider that the Local Plan fails to account for the issues currently facing the development industry relating to increases in build costs, stagnation of residential values, and the introduction of new standards and legislation, all of which are resulting in significant increased costs and therefore challenging development viability across London.</p> <p>We strongly feel that this should be given sufficient consideration across the emerging draft Local Plan Partial Review. We are currently concerned regarding the lack of sound evidence supporting the Local Plan consultation and request that this is robustly reviewed in line with the up-to-date NPPF guidance.</p> <p>We trust the above is self-explanatory in providing our comments on the Regulation 19 Consultation on the Wandsworth draft Local Plan Partial Review. We would welcome the opportunity to continue to discuss the commentary with officers as the process moves forward.</p>		

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50	Rory Chambers obo Southside Limited Partnership [See also Row 124]	LP23				<p>Dear Planning Policy Team</p> <p>Wandsworth Local Plan Partial Review Regulation 19 Consultation Representations submitted on behalf of the Southside Limited Partnership These representations have been prepared by Quod on behalf of the Southside Limited Partnership in response to Wandsworth Council's Local Plan Partial Review Regulation 19 consultation.</p> <p>As owners and operator of Southside Shopping Centre, the Southside Limited Partnership has concerns that the revisions proposed to the policies within the Wandsworth Local Plan will significantly impact the viability and deliverability of new development in the borough which includes the deliverability of affordable housing when it is needed most.</p> <p>Context Southside Shopping Centre is home to a wide variety of regional and national businesses and is a significant employer for the local area. Southside Shopping Centre offers a variety of key community services and acts as a hub for community interaction.</p> <p>The joint owners are committed to modernising Southside Shopping Centre to make the space more attractive to investment whilst enabling the shopping centre and Wandsworth to retain and attract a variety regional and national brands. It is within this context that the Southside Limited Partnership have an interest in new development within the Borough.</p> <p>The need for viable development As a long-term, institutional investor and developer, the Southside Limited Partnership recognises that shaping places which stand the test of time requires development that reflects and responds to the needs and aspirations of communities. The Southside Limited Partnership are acutely aware of the urgent need for affordable homes, including social homes, within Wandsworth.</p> <p>As noted in Paragraph 85 of the NPPF, "planning policies and decisions should help create the conditions in which businesses can invest, expand and adapt." The provision of new homes in the right places is an important contributing factor in supporting economic growth and bolstering the economy. The Southside Limited Partnership recognises the intentions behind the proposed amendments to Policies LP23 and LP24 and the need to increase the provision of Affordable Housing within the Wandsworth. However, the Southside Limited Partnership has concerns that the amendments sought will undermine the viability of future development and the ability for the private sector to fund new affordable homes in the borough.</p> <p>Housing starts and completions in the England are at their lowest level since the wake of the 2008 financial crisis. The country faces a severe housing crisis fuelled by historic undersupplies of new housing, a cost-of-living crisis, fluctuating interest rates and an unprecedented rise in construction costs due to increases in the cost of energy, labour and materials. New housing developments in Wandsworth have been significantly</p>	<p>For Wandsworth to continue as a growing and economically competitive borough, the Southside Limited Partnership believe that the following amendments should be made to the draft Local Plan:</p> <ul style="list-style-type: none"> • Policy LP23(A)'s strategic target for affordable housing should be reduced; • Policy LP23(C)'s affordable housing target should be reduced; • The Fast Track route in LP23(D) should be amended to 35%, in line with the London Plan; and • LP24(A) should be amended to remove prescriptive minimum and maximum proportions of market dwelling types. 	<p>Comments Noted.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The Housing Needs Assessment identifies an extremely high need for affordable housing across the plan period, up to 23,600 affordable homes, a majority of which are needed for social rented housing. As set out in the Housing Background Paper, there are strong social and economic imperatives to plan to meet this need.</p> <p>The Council has specifically designed the policy to ensure it is effective and deliverable, as demonstrated through the evidence base. In particular, the Whole Plan Viability Assessment demonstrates that a significant number of development typologies would be viable at a 45% threshold, which is the threshold required under the Council's Fast Track Route. As set out in the Housing Background Paper, there is a strong correlation between the most viable typologies and the types of sites expected to contribute to the Borough's long-term housing supply, such that there can be overall confidence in the policy being deliverable for a significant proportion of developments. The policy also retains a Viability Tested Route which means that developments which cannot maintain viability whilst meeting the requirements of the policy can still receive planning permission. The Council also considers it important that deliverability is evaluated across a plan period and as such that it is important to avoid giving disproportionate weight to short-term market conditions when there is a fair and evidenced expectation that market conditions will improve across the plan period. For these reasons, the Council considers there to be no likelihood of the proposed policy having a materially negative impact on local housing supply or deliverability and considers the policy to provide an effective and proportionate mechanism for addressing developments which cannot meet its requirements in full. There are a number of examples of recent developments achieving or offering affordable housing percentages in excess of the existing 35% threshold which demonstrate a higher threshold can be achieved. Further analysis of the matters summarised above, and the overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p>	

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						<p>impacted by these factors and face extreme viability challenges with new starts in the borough being at their lowest level for four years. Only 460 new permanent dwellings began construction in 2023/24, a 72% decline on the previous year and only around one tenth of the 4,383 homes annual need indicated by the government's Standard Method.</p> <p>For investment to be provided in Wandsworth, there must be a trade-off where policy allows the private sector to deliver viable development. The proposed amendments to Policy LP23 (affordable housing) are out of step with the reality of what is viable. The proposed higher strategic target for affordable housing will inevitably place severe pressure on the deliverability of new housing developments in the borough, in particular for development on urban land which often comes with significant costs to ready for development. In turn, this will impact the ability for affordable housing to be provided in the borough.</p> <p>In addition, increasing the Fast Track threshold to 45% will mean that schemes that previously would have been considered fast track will be delayed by viability assessments which could take considerable time to resolve. In turn, this could result in many developers deciding not to invest in the delivery of housing in Wandsworth which would lead to a reduction of housing delivery in the borough, including affordable housing.</p> <p>Furthermore, the proposed amendments to Policy LP24 (Housing Mix) will further add to growing viability pressures by reducing the average price per square foot of homes, as larger unit types typically achieve lower prices per square foot. In turn, this reduction impacts the ability of schemes to fund affordable housing.</p> <p>Conclusion As a significant landowner within Wandsworth, the Southside Limited Partnership has concerns that the revisions proposed to the policies within the Wandsworth Local Plan will detrimentally impact and constrain the viability and deliverability of new development in the Borough. As set out above, the proposed revisions to Policy LP23 and LP24 do not align with the reality where increased costs have resulted in new building starts in Wandsworth being at their lowest level for four years.</p> <p>For Wandsworth to continue as a growing and economically competitive borough, the Southside Limited Partnership believe that the following amendments should be made to the draft Local Plan:</p> <ul style="list-style-type: none"> • Policy LP23(A)'s strategic target for affordable housing should be reduced; • Policy LP23(C)'s affordable housing target should be reduced; • The Fast Track route in LP23(D) should be amended to 35%, in line with the London Plan; and • LP24(A) should be amended to remove prescriptive minimum and maximum proportions of market dwelling types. <p>If you have any queries regarding the above, we would be pleased to discuss this with you further.</p>			

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51	Andrew Russell obo TfL Places for London [See also Row 158 and 179]	LP23		N		Effective, Justified	<p>Dear Sir / Madam</p> <p>Re: Wandsworth Local Plan Partial Review Publication (Reg 19) Consultation Places for London Response</p> <p>Thank you for providing the opportunity to comment on the Partial Review of the Wandsworth Local Plan. Please note that the views expressed in this letter are those of Places for London planning team in its capacity as landowner and developer only, and do not form part of the Transport for London (TfL) response in its role as transport operator and highway authority.</p> <p>Places for London Places for London is TfL's financially independent property company, formerly known as TTL Properties. TfL is one of the largest landowners in the capital with over 5,500 acres of land across the capital, including highly accessible land and buildings on or next to stations, bus and highways infrastructure. Our mission at Places for London is to release more of the untapped potential on TfL owned land by improving existing property assets and by building homes and workspaces to meet the growing needs of our city. We aim to create high quality places for Londoners to live, work and play which are sensitive to local needs and communities and improve access for all.</p> <p>Our key concerns with the draft policies in the Partial Review are:</p> <ul style="list-style-type: none"> • the proposal to increase the affordable housing threshold from 35% to 45%; • the proposal to require late stage reviews on Fast Track Route compliant applications; • the restrictive approach to Build to Rent schemes which would now all have to follow the Viability Tested Route and prioritise low cost rent either on-site, off-site or via a payment in lieu approach, effectively turning off London Plan policies on Build to Rent in the borough; and • the restrictive approach to intermediate shared ownership even where this complies with the Mayor's definition of 'genuinely affordable housing as set out in the London Plan. We consider that this is not in accordance with the London Plan and would have a negative impact on overall housing supply in the borough. <p>Our comments on the Partial Review of the Local Plan are informed by our wider portfolio of major development opportunities across London and property assets. Within Wandsworth, we have the following sites which we consider have potential for redevelopment / enhancement:</p> <ul style="list-style-type: none"> • Land at East Putney Station • 2, 2a, 2b, 2c and 2d Tooting Bec Road • Land at Trinity Road (inc. 4-8 Trinity Road) • Wandsworth Bridge Roundabout <p>Draft Policy LP23 Affordable Housing The proposed approach would increase the affordable housing threshold in the London Plan from 35% to 45%. Whilst we share the borough's ambition to increase affordable</p>	<p>A more appropriate strategy would be to stick with the Mayor's Fast Track Route which has been found sound at the London Plan Examination in Public and provides certainty and consistency across London.</p> <p>The following change should be made to draft Policy LP23 D2: 'Fast tracked development proposals providing between 45-50% affordable housing by habitable room are not required to provide a viability assessment at application stage, however, an early and late review mechanism will be applicable.'</p> <p>We recommend that the wording of paragraph 17.25 should be revised to read: 'the Council will strongly resist any development provides less than a policy compliant offer of affordable housing on site. following the Viability Tested Route which does not provide the maximum viable level of affordable housing.'</p> <p>Paragraph 17.17 states that shared ownership will need to be justified by applicants at planning submission stage and 'will only be accepted if it facilitates the delivery of a higher number of social rented dwellings'. This approach is not in accordance with the London Plan and is unjustified and unsound and should be deleted.</p>	<p>Comments Noted.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The Housing Needs Assessment identifies an extremely high need for affordable housing across the plan period, up to 23,600 affordable homes, a majority of which are needed for social rented housing. As set out in the Housing Background Paper, there are strong social and economic imperatives to plan to meet this need.</p> <p>The Council has specifically designed the policy to ensure it is effective and deliverable, as demonstrated through the evidence base. In particular, the Whole Plan Viability Assessment demonstrates that a significant number of development typologies would be viable at a 45% threshold, which is the threshold required under the Council's Fast Track Route. As set out in the Housing Background Paper, there is a strong correlation between the most viable typologies and the types of sites expected to contribute to the Borough's long-term housing supply, such that there can be overall confidence in the policy being deliverable for a significant proportion of developments. The policy also retains a Viability Tested Route which means that developments which cannot maintain viability whilst meeting the requirements of the policy can still receive planning permission. The Council also considers it important that deliverability is evaluated across a plan period and as such that it is important to avoid giving disproportionate weight to short-term market conditions when there is a fair and evidenced expectation that market conditions will improve across the plan period. For these reasons, the Council considers there to be no likelihood of the proposed policy having a materially negative impact on local housing supply or deliverability and considers the policy to provide an effective and proportionate mechanism for addressing developments which cannot meet its requirements in full. There are a number of examples of recent developments achieving or offering affordable housing percentages in excess of the existing 35% threshold which demonstrate a higher threshold can be achieved. Further analysis of the matters summarised above, and the overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p> <p>The application of a Late Stage Review for Fast Tracked developments providing between 45-50% is intended to provide further incentive for applicants to maximise the amount of affordable housing they deliver in the context of the overall 50% strategic target set out in both the London Plan and Council's Local Plan.</p> <p>The Council has recommended a potential modification to supporting Paragraph 17.25 for the Inspector's consideration which would clarify that the Council will not</p>

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						<p>housing provision, we are concerned that the proposed approach risks both undermining the Mayor's Fast Track Route and constraining housing delivery. This represents a very substantial increase in the expectations of planning policy at a time when the development industry and housing pipeline is facing severe challenges. This will have significant viability and deliverability implications.</p> <p>The London Plan Fast Track Route is well-established and seeks to provide much needed planning certainty across London. A key purpose of the London Plan Fast Track Route is to provide a consistent pan-London percentage threshold, helping to speed up the planning process. The way the Fast Track Route is intended to work is by incentivising applicants to meet the thresholds to avoid lengthy and uncertain viability tested route and mid and late stage viability review mechanisms. GLA data has shown this to be effective policy approach in terms of both overall and affordable housing delivery .</p> <p>In its recently published Practice Note: Accelerating Housing Delivery (Dec 2024), the GLA underlined the need for boroughs to follow the established London Plan Fast Track Route when setting Local Policies. Boroughs are advised against setting higher affordable housing thresholds given that this risks undermining the overall London Plan approach. Paragraph 3.7-8 of the Practice Note states: 'This approach can disincentivise applicants from following the FTR, slow down the planning process and require additional resourcing to assess the application. It can also result in lower levels of affordable housing being secured. ...This approach risks the successful implementation of the London Plan threshold approach which is a matter of strategic concern for the Mayor.'</p> <p>We question whether current market circumstances and conditions justify increasing the Fast Track Route affordable housing threshold in Wandsworth to 45%. Currently, there are a range of challenges that are affecting housing delivery including significant build cost inflation, higher interest rates, finance costs and construction capacity. The appetite of Registered Providers to take on affordable homes secured via S106 agreements is currently constrained due to well-publicised issues associated with cladding remediation and viability. This overall economic outlook has been compounded by the lack of certainty and procedural clarity on fire safety regulations for residential buildings over 18 metres in height. Consequential impact on housing supply is evidenced by MHCLG and GLA data on housing starts, permissions and completions.</p> <p>In summary, we are concerned that increasing the threshold level to 45% at the present time would not be deliverable in most instances based on our experience. The incentive to follow the Fast Track Route would be significantly eroded and the viability tested route would be followed in most instances. The function of the Fast Track Route would therefore be significantly diluted. Wandsworth's proposed policy approach might result in lower percentages of affordable housing being delivered on schemes and less affordable housing being delivered overall.</p> <p>We consider that the Partial Review is unsound because it is not justified or effective. A</p>		<p>resist development providing less than a policy compliant offer of affordable housing on site, where this is agreed through the application of the Viability Tested Route.</p> <p>The Council's Housing Needs Assessment identifies that Shared Ownership housing is not an affordable product for a majority of the Borough's residents, particularly relative to social rented housing and London Living Rent. In this context, the Council considers it appropriate to prioritise more affordable products within the intermediate tenure to ensure that the affordable housing that is delivered best caters for local needs. The policy as prepared does not, however, preclude the delivery of other forms of intermediate housing where these are justified at the application stage.</p>	

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						<p>more appropriate strategy would be to stick with the Mayor's Fast Track Route which has been found sound at the London Plan Examination in Public and provides certainty and consistency across London.</p> <p>Late stage reviews on Fast Track Route compliant schemes Policy LP23 part D2 sets out a requirement for late-stage reviews for developments which follow the Fast Track Route. Insisting on a late-stage review for fast tracked developments is not in accordance with London Plan Policy H5 and would disincentivise applicants from following the Fast Track Route. The following change should be made to draft Policy LP23 D2: 'Fast tracked development proposals providing between 45-50% affordable housing by habitable room are not required to provide a viability assessment at application stage, however, an early and late review mechanism will be applicable.'</p> <p>Paragraph 17.25 This states that 'the Council will strongly resist any development which provides less than a policy compliant offer of affordable housing on site.' We consider that this sentence should be revised as it is inconsistent with and in conflict with the Viability Tested Route. Where it is verified that a scheme is demonstrably providing the maximum viable level of affordable housing, this is a policy compliant outcome, in accordance with London Plan Policy H5. We recommend that the wording of paragraph 17.25 should be revised to read: 'the Council will strongly resist any development provides less than a policy compliant offer of affordable housing on site. following the Viability Tested Route which does not provide the maximum viable level of affordable housing.'</p> <p>Portfolio Approach London Plan Policy H4 identifies that public sector landowners with agreements with the Mayor can take a portfolio approach to delivering 50% affordable housing across public landholdings in London. As set out in London Plan Policy H5, individual applications on public sector land may be subject to the Mayor's 35% affordable housing threshold where there is a portfolio agreement with the Mayor. This is clarified in paragraph 4.5.6 of the London Plan.</p> <p>Places for London has such an agreement with the Mayor. Under this portfolio agreement, we are required to provide 50% affordable housing across our entire landholdings in London. We therefore welcome the inclusion of 'portfolio agreement with the Mayor' in draft Policy LP23, Part D, b, which should be retained as part of the Partial Review of the Local Plan.</p> <p>Shared ownership We are concerned about the proposed approach to shared ownership, which reads as overly restrictive and negative towards this tenure of affordable housing. Paragraph 17.17 states that shared ownership will need to be justified by applicants at planning submission stage and 'will only be accepted if it facilitates the delivery of a higher number of social</p>			

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						<p>rented dwellings'. This is approach is not in accordance with the London Plan and is unjustified and unsound and should be deleted.</p> <p>London Shared Ownership is one of the Mayor's preferred genuinely affordable intermediate housing tenures, as set out in the London Plan and GLA planning guidance. To be considered genuinely affordable by the Mayor, shared ownership homes are subject to maximum income caps and requirements to ensure no more than 40% of net household income is spent on overall housing costs (including mortgage, interest rates and service charge). Local eligibility restrictions can also apply in terms of maximum income thresholds and other criteria. These restrictions and caps are secured via S106 agreement.</p> <p>Small sites (1-9 dwellings) The aim to secure viable levels of financial contribution towards off-site provision of social rent housing within the borough from small sites must therefore be very carefully balanced against the overarching objective to enable housing delivery on small sites. The impact of this type of policy approach on the viability, complexity and timescales for housing provision on small sites has been evidenced and should be carefully considered . Small sites can be complex and challenging to deliver and any exceptional or abnormal development costs must be taken into account to avoid developable land being rendered unviable and undeliverable. Whilst values in certain parts of the borough could possibly support a financial contribution, other lower value areas of the borough may not, so there should always be a degree of flexibility in application. The policy does state that in 'exceptional cases' applicants may submit Financial Viability Appraisals to demonstrate that this is the case, which would be independently verified. The maximum viable contribution would be sought. This flexibility is welcomed. Public land should be considered. In particular, whether or not sites: (a) form part of a portfolio agreement with the Mayor (see above); or are (b) providing affordable housing on public land. A small number of our wider housing portfolio of sites fall into the category of 'small sites' and could therefore be covered by our portfolio agreement. We trust that the enclosed is in order. Please do not hesitate to contact me on the details provided if you wish to discuss any of the content.</p>			

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52	Lucinda Turner obo Greater London Authority [See also Row 149, 172, 180 and 198]	LP23					<p>Dear Adam,</p> <p>Planning and Compulsory Purchase Act 2004 (as amended); Greater London Authority Acts 1999 and 2007; Town and Country Planning (Local Development) (England) Regulations 2012</p> <p>RE: Wandsworth Local Plan Partial Review: Regulation 19 Consultation</p> <p>Thank you for consulting the Mayor of London on the London Borough of Wandsworth's (LBW's) proposed Draft Submission Local Plan (Partial Review) (Regulation 19). As you are aware, all Development Plan Documents in London must be in general conformity with the London Plan under section 24 (1)(b) of the Planning and Compulsory Purchase Act 2004. The Mayor has afforded me delegated authority to make detailed comments which are set out below.</p> <p>The Mayor provided comments on the earlier LBW Local Plan (Partial Review) (Regulation 18) consultation on the 4 December 2023 (Reference: LDF32/LDD10/LP01/JB01). This letter follows on from that earlier advice and sets out where you should make further amendments so that the draft Plan is in general conformity and more closely aligned with the London Plan 2021 (LP2021). These comments should be read alongside the Mayor's previous response.</p> <p>General The Mayor notes that LBW has an up-to-date Local Plan, which was adopted in July 2023, and understands that this is a Partial Review of the Plan which seeks to reconsider the following six policies; LP23: Affordable Housing, LP24: Housing Mix, LP28: Purpose Built Student Accommodation, LP29: Housing with Shared Facilities, LP30: Build to Rent and LP31: Specialist Housing for Vulnerable People and for Older People.</p> <p>It is the Mayor's opinion that as currently written the draft Plan is not in general conformity with the London Plan due to the proposed approach to affordable housing. Further detail on that is provided in the subsequent sections of this letter.</p> <p>Affordable Housing The Mayor notes that Policy LP23 of the draft Plan reflects his strategic target that 50 per cent of all new housing is to be affordable, as set out in Policy H4 of the LP2021. This is welcomed.</p> <p>In order for residential planning applications on private land to follow the Fast Track Route (FTR), LBW are proposing to set the affordable housing threshold at 45 per cent, which is higher than the 35 per cent threshold level for private, non-industrial land set out in the LP2021.</p> <p>The thresholds set in Policy H5 of the LP2021 have been informed by viability testing and help to embed affordable housing requirements into land values, creating greater certainty</p>	<p>In order for the Mayor to withdraw his general conformity objection LBW should reflect the thresholds established in the LP2021, and remove the requirement for a late-stage viability review from schemes that follow the FTR. This is important to maximise the delivery of affordable housing in the borough.</p>	<p>Comments Noted.</p> <p>The Council has developed its proposed policy approach to be in general conformity with the London Plan, including through retention of a 50% strategic target and a Fast Track Route, whilst incorporating additional features justified on the basis of local circumstances. The Housing Background Paper sets out examples of other London-based authorities who have adopted similar features into affordable housing policies whilst remaining in general conformity with the London Plan. Further analysis on conformity with the London Plan is set out in the Housing Background Paper. The Council will seek to continue its positive engagement with the Greater London Authority and agree a Statement of Common Ground addressing these issues in due course.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The Housing Needs Assessment identifies an extremely high need for affordable housing across the plan period, up to 23,600 affordable homes, a majority of which are needed for social rented housing. As set out in the Housing Background Paper, there are strong social and economic imperatives to plan to meet this need.</p> <p>The Council has specifically designed the policy to ensure it is effective and deliverable, as demonstrated through the evidence base. In particular, the Whole Plan Viability Assessment demonstrates that a significant number of development typologies would be viable at a 45% threshold, which is the threshold required under the Council's Fast Track Route. As set out in the Housing Background Paper, there is a strong correlation between the most viable typologies and the types of sites expected to contribute to the Borough's long-term housing supply, such that there can be overall confidence in the policy being deliverable for a significant proportion of developments. The policy also retains a Viability Tested Route which means that developments which cannot maintain viability whilst meeting the requirements of the policy can still receive planning permission. The Council also considers it important that deliverability is evaluated across a plan period and as such that it is important to avoid giving disproportionate weight to short-term market conditions when there is a fair and evidenced expectation that market conditions will improve across the plan period. For these reasons, the Council considers there to be no likelihood of the proposed policy having a materially negative impact on local housing supply or deliverability and considers the policy to provide an effective and proportionate mechanism for addressing developments which cannot meet its requirements in full. There are a number of examples of recent developments achieving or offering affordable housing percentages in excess of the existing 35% threshold which demonstrate a higher threshold can be achieved. Further analysis of the matters summarised above, and the overall justification for the policy approach in relation to housing need,</p>

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						<p>and consistency across London, and increase affordable housing delivery while also speeding up the planning process. For privately owned land, the 35 per cent threshold is set at a level that has proven effective at securing affordable housing. The 2022 London Plan Annual Monitoring Report illustrates that 84 per cent of all strategic applications provided at least 35 per cent affordable housing, representing an increase from 53 per cent of schemes in 2018.</p> <p>The borough's area-wide viability assessment indicates that for the majority of scenarios tested, providing 45 per cent affordable housing, especially for private, non-industrial sites, would be unviable. Although intended to secure a higher level of affordable housing, in practice this would disincentivise applicants from following the FTR, and require the majority of schemes on private land to be viability tested, slowing down the planning process and requiring additional resourcing to assess applications. Most importantly, it is also likely to result in lower levels of affordable housing being secured and/or reduce the effectiveness of viability reviews.</p> <p>This is important because between 2018 and 2023 the average proportion of affordable housing secured in referable applications that followed the FTR has been consistently higher than those that followed the VTR. The approach would also result in a greater uncertainty when acquiring land due to the lack of consistency in affordable housing provision from site to site.</p> <p>Furthermore, applicants also typically seek to demonstrate the existence of 'viability deficits' through the viability assessment process and use these as a credit in viability review mechanisms which can reduce the likelihood that additional affordable housing is secured over the lifetime of the development.</p> <p>It is also noted that Policy LP23 part D2 sets out a requirement for late-stage reviews for developments which follow the FTR. Insisting on a late-stage review for fast tracked developments is not in accordance with Policy H5 and could further disincentivise applicants from following the FTR. LBW are urged to remove this requirement from the policy and to follow the approach to review mechanisms set out in the LP2021.</p> <p>Overall, this divergence from the approach set out in LP2021 Policy H5 is significant and risks the successful implementation of the London Plan threshold approach which is a matter of strategic concern for the Mayor. For that reason it is the Mayor's opinion that the proposed approach to affordable housing is not in general conformity with the LP2021. The Mayor's position is reflected in the Practice Note on Accelerating Housing Delivery at paragraph 3.8 which is clear that where boroughs intend to increase the threshold level to one which is higher than in the LP2021, the Mayor will raise this as an issue of general conformity with the LP2021 at local plan consultations and inquiries.</p> <p>In order for the Mayor to withdraw his general conformity objection LBW should reflect the thresholds established in the LP2021, and remove the requirement for a late-stage viability</p>		<p>housing supply and viability are set out in detail in the Housing Background Paper.</p> <p>Copies of responses to the previous Regulation 18 consultation are available in a separate appendix.</p> <p>The application of a Late Stage Review for Fast Tracked developments providing between 45-50% is intended to provide further incentive for applicants to maximise the amount of affordable housing they deliver in the context of the overall 50% strategic target set out in both the London Plan and Council's Local Plan.</p> <p>Further information regarding the viability of common typologies tested is set out in detail within the Housing Background Paper. In summary, the background paper sets out that the most common site types within the Councils housing pipeline are site including existing retail, industrial and cleared land, as being the most common site types within the housing trajectory making up over 62% of projected completions, and only 7.5% of housing completions are projected to be on existing office space.</p> <p>Overall, the Whole Plan Viability Assessment results show that 77% of the models tested can viably provide 45% affordable housing within BLV 2, 3 and 4 (this includes retail, industrial and cleared land respectively). This figure reduces to 70% of models being viable at 45% affordable housing, when the BLV 1 (existing office space) is included, and does show a more challenging viability picture due to the higher existing use values of office space. However, as stated above, a small proportion of the Council's housing pipeline is on existing office space.</p> <p>In addition, where sites are generating high levels of income and where existing buildings optimise use of the site which is the case for many existing office uses, landowners are clearly far less likely to release land for development, and these sites are very unlikely to come forward for development. It would be unrealistic the base the boroughs viability position on one BLV which illustrates a more challenging position, and makes up a small proportion of projected housing completions.</p> <p>Net to gross ratios are based on observed ratios seen across a range of live developments.</p>	

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						<p>review from schemes that follow the FTR. This is important to maximise the delivery of affordable housing in the borough.</p> <p>Viability Assessment The draft Plan is supported by a viability assessment. Officers have reviewed this assessment and have the following comments for your consideration:</p> <ol style="list-style-type: none"> 1. The majority of the scenarios tested in the viability assessment appear to be unviable with 45 per cent affordable housing, especially for private, non-industrial sites which have higher benchmark land value (BLVs). 2. The net to gross ratios assumed for the residential typologies in the viability testing seem optimistic. Evidence should be provided to justify the net to gross assumptions adopted in the whole plan viability assessment with reference to recent cases in the borough to ensure that they are realistic. 			
53	Chris Wheaton obo St George's Plc [See Also Row 126]	LP23				<p>Dear Planning Policy Team</p> <p>Wandsworth Local Plan Partial Review Regulation 19 Consultation – Representations Submitted on Behalf of St George Plc</p> <p>Quod is appointed by St George Plc ("St George") to prepare representations in relation to the council's Local Plan Partial Review consultation. Whilst supportive of the council's aims to increase the supply of housing and affordable housing, St George has serious concerns that the policies as proposed will reduce housing delivery at a time when the opposite is needed.</p> <p>Context</p> <p>St George is currently delivering the Wandsworth Mills development (former Ram Brewery), and have a strong track record of delivering homes in LB Wandsworth including St George Wharf and Battersea Reach. At Wandsworth Mills St George are delivering 383 new homes, including the restoration of Grade II listed assets and the creation of new high quality public realm.</p> <p>St George is part of the wider Berkeley Group, one of London's largest developers, with particular expertise in the delivery of large-scale, complex brownfield regeneration. The group has delivered 19,608 homes over the last 5 years and intends to be a significant contributor to the government's aims to deliver 1.5 million homes over the parliament. Given its positive track record in London and Wandsworth it is likely that the Group will explore the opportunity to bring further sites forward in the borough over the plan period.</p> <p>Policy LP23 Affordable Housing</p> <p>Housing market context</p>	<p>Given all of the above, the following changes should be made to draft policy LP23:</p> <ul style="list-style-type: none"> • The strategic target for affordable housing in LP23(A) should be amended to the level which is evidenced to be viable in line with PPG methodology, having regard to the comments made above on the current BNPP viability assessment. • The affordable housing target in LP23(C) should also be amended as above. • The Fast Track route in LP23(D) should be amended to 35% with all other details of the Fast Track route in the policy and supporting text also amended to be in line with the London Plan. • Supporting text 17.23 should be amended to make clear that all Registered Providers (traditional and for-profit) will be acceptable. 	<p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The Housing Needs Assessment identifies an extremely high need for affordable housing across the plan period, up to 23,600 affordable homes, a majority of which are needed for social rented housing. As set out in the Housing Background Paper, there are strong social and economic imperatives to plan to meet this need.</p> <p>The Council has specifically designed the policy to ensure it is effective and deliverable, as demonstrated through the evidence base. In particular, the Whole Plan Viability Assessment demonstrates that a significant number of development typologies would be viable at a 45% threshold, which is the threshold required under the Council's Fast Track Route. As set out in the Housing Background Paper, there is a strong correlation between the most viable typologies and the types of sites expected to contribute to the Borough's long-term housing supply, such that there can be overall confidence in the policy being deliverable for a significant proportion of developments. The policy also retains a Viability Tested Route which means that developments which cannot maintain viability whilst meeting the requirements of the policy can still receive planning permission. The Council also considers it important that deliverability is evaluated across a plan period and as such that it is important to avoid giving disproportionate weight to short-term market conditions when there is a fair and evidenced expectation that market conditions will improve across the plan period. For these reasons, the Council considers there to be no likelihood of the proposed policy having a materially negative impact on local housing supply or deliverability and considers</p>	

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						<p>England faces what the Deputy Prime Minister described as an “acute and entrenched housing crisis”. Within London only 25,511 residential dwellings began construction in 2023/24, down from 48,089 the previous year and less than a third of the 88,000 homes needed under the government Standard Method.</p> <p>New housing starts in Wandsworth are at their lowest level in four years. Only 460 new permanent dwellings began construction in 2023/24, a 72% decline on the previous year and only around one tenth of the 4,383 homes annual need indicated by the government's Standard Method.</p> <p>Build costs have increased in excess of sales values, with the BCIS All-in Tender Price Index indicating an increase of 20% over the last 5 years while Land Registry House Price Statistics indicate sales values in Wandsworth have fallen by 2% over the same period. Changes to Building Regulations and the requirement for 2 staircases have all added to cost and reduced building efficiency whilst finance costs remain high and Registered Providers are often unable to take on new homes due to financial pressures with existing stock. The GLA acknowledges the challenges which London faces, releasing its Accelerating Housing Delivery practice note in December 2024 with measures seeking to start to increase housing delivery.</p> <p>All of the above makes clear the challenges facing housing delivery in Wandsworth. Analysis of the data on housebuilding in the area can only lead to the conclusion that viability is extremely challenging and this is preventing development coming forward. Against this backdrop and the need to increase housing delivery it cannot be logical to increase the requirements for affordable housing, putting further pressure on scheme viability and further reducing delivery.</p> <p>Viability</p> <p>The BNPP Local Plan Viability Assessment (August 2024) supporting the local plan partial review indicates that around 50% affordable homes can be viably delivered in almost all anticipated development scenarios. This conclusion is surprising given that the adopted local plan allows applicants to deliver 35% affordable homes via the Fast Track route but developers are clearly not able to achieve this given the housing delivery position set out above.</p> <p>The following comments are noted in relation to the medium and high density development scenario testing which is most relevant to the types of project delivered by St George:</p> <ul style="list-style-type: none"> • Build costs – Appendix 1 to the viability assessment indicates a build cost ranging from £2,163 to £2,555/m2 excluding external works (£2,379 to £2,811/m2 including external works) for medium to high density apartment schemes. Exceptional / abnormal costs are excluded. The adopted build costs are considered to be unrealistically low for this type of development, in part caused by the almost complete absence of tall buildings within the BCIS database on which BNPP rely. For comparison, the build costs put forward by BNPP 		<p>the policy to provide an effective and proportionate mechanism for addressing developments which cannot meet its requirements in full. There are a number of examples of recent developments achieving or offering affordable housing percentages in excess of the existing 35% threshold which demonstrate a higher threshold can be achieved. Further analysis of the matters summarised above, and the overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p> <p>The Council's Housing Background Paper includes a range of examples of where multiple sites have been offered at either 35% affordable housing or higher percentages on site. In addition, the level of affordable housing permitted on major developments is equivalent to 36% affordable housing within the monitoring year 2023/24, showing there are a significant number of sites within the planning system within the borough that have been able to support at least 35% affordable housing, despite the current Local Plan offering little incentive for applicants to provide more than 35% affordable housing when the Fast Track Route is applied.</p> <p>In relation to build costs, the build costs used are consistent with BCIS data, which are based on tenders submitted for live developments. The use of BCIS data is advocated by the PPG. In relation to the point regarding the Stag Brewery build costs, these have been based on a site specific build costs plan and therefore would not be relevant to the whole plan viability assessment within Wandsworth.</p> <p>Although the BoE base rate did show sudden sharp increases in 2022, interest rates are steadily falling and with Local Plan periods required to be at least 15 years, it is important to consider longer term trends as part of the Local Plan Viability Assessment. For this reason, we considered a 6.5% finance rate to be reasonable. It is also an accepted principle within viability assessments that it is assumed all the costs associated with a development are financed, which, in reality is often not the case, which builds additional flexibility to the testing.</p> <p>In relation to the net to gross ratio, BNPP have provided the following response; “These are based on net to gross ratios seen across a range of live developments”.</p> <p>In addition, the approach adopted by BNPP in relation to abnormal costs and contamination is the approach supported within the NPPG. The Council have recent examples of sites including a BLV of £0 due to excessive costs associated with contamination and enabling works, this is commonplace within viability assessments.</p>	

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						<p>on behalf of the appellant for the recent Stagg Brewery Inquiry amount to £3,520/m2 excluding external works and exceptional items and £5,100/m2 including external works and exceptional items. For the 1,750 home scenario within the viability assessment (typology 34) this means that BNPP allow build costs of £415m whereas applying the costs from the Stagg Brewery appeal pro-rata would amount to £759m. The costs within the viability assessment are therefore substantially below achievable levels.</p> <ul style="list-style-type: none"> • Finance costs – The viability assessment allows a finance rate of 6.5%, this compares to a rate of 6% adopted within the January 2022 viability assessment supporting the adopted local plan. In January 2022 Bank of England base rates were 0.25% compared to today's figure of 4.5%. Bank rates have therefore increased by 4.25% whilst the local plan viability rate has only increased by 0.5%. This is unrealistic and therefore understates finance costs. • Building efficiency – The viability assessment adopts a net:gross ratio of 75 to 85% for the conventional residential scenarios. This figure is unrealistic for medium to high density residential development incorporating 2nd stair requirements and policy requirements in relation to dual aspect. Adoption of an unrealistic efficiency means that BNPP's study substantially under-states the size of buildings and therefore build costs. It is noted that Appendix 18 to the BNPP study suggests that exceptional / abnormal costs are excluded as PPG indicates these should be deducted from the Benchmark Land Value (BLV). This approach is clearly not logical where the BLV is based on an Existing Use Value. As indicated by PPG (Paragraph: 013 Reference ID: 10-013-20190509), the BLV must offer the landowner a reasonable incentive in comparison to other options available. Deducting exceptional costs caused by redevelopment from the EUV would mean that the landowner would receive a sum below the value of the site in its existing use – this would clearly not provide an incentive to sell in comparison to simply retaining the existing (financially more attractive) use. The approach would also disincentivise use of previously developed and brownfield land, contrary to the clear policy support for such land within paragraph 125C of the NPPF. <p>Relevant Policy</p> <p>Local plans adopted by boroughs must be in general conformity with the adopted London Plan. The regulation 19 proposal for a Fast Track threshold of 45% is out of step with the London Plan requirement of 35%, meaning that the plan is not in general conformity with the London Plan. The GLA directly addressed the above issue within its recent Accelerating Housing Delivery practice note (December 2024). The note advised at paragraph 3.8 that the adoption of threshold levels above 35% by a small number of boroughs "risks the successful implementation of the London Plan threshold approach which is a matter of strategic concern for the Mayor. This has been raised by the GLA and will continue to be raised as an issue of general conformity with the London Plan at local plan consultations and inquiries."</p> <p>Wider Matters</p>		<p>In relation to the recently published Practice Note from the GLA, it clearly seeks to provide a short term solution to the delivery of housing. Local Plan policy however needs to consider a longer-term approach to delivery as a Local Plan period is at least 15 years. A number of the approaches within the GLA Practice Note are time limited to 3 years from the publishing date of the note (24.12.2024), showing it is aimed at providing short term solutions to current issues within the development industry. Although it is a legal requirement to conform to the London Plan, there is no specific guidance on conformity and consideration of local circumstances is clearly set out within para 9 of the NPPF which states '<i>Planning policies and decisions should play an active role in guiding development towards sustainable solutions, but in doing so should take local circumstances into account, to reflect the character, needs and opportunities of each area.</i>'</p> <p>Further analysis of the viability assessment can be found in the Whole Plan Viability Assessment and Housing Background Paper.</p> <p>The Council has recommended a potential modification to supporting Paragraph 17.24 for the Inspector's considerations which would clarify how the Council intends to interpret "re-submitted" and to specifically acknowledge the exemption of Section 96A applications.</p> <p>The Council wants to ensure that reasonable rents are maintained in perpetuity for its residents within all forms of affordable housing. 'For profit' affordable housing providers are a concern for the Council as they are less likely to provide the best value for money for residents. The Council will therefore seek to prioritise the delivery of affordable housing by Registered Providers who are not considered for-profit associations.</p> <p>The Council's housing enabling team works extensively with RPs and developers in the borough to ensure developers have multiple opportunities to engage with Registered Providers.</p> <p>The policy justification for the Council needing to provide additional affordable housing and maximise opportunities to deliver affordable housing within the borough are set out in detail within the Council's Housing Background Paper.</p>	

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						<p>Supporting text paragraph 17.24 notes that all schemes which have been “re-submitted” to the council and did not meet the threshold level of affordable homes in the original permission will be subject to inclusion of review mechanisms. The wording “re-submitted” is unclear in scope and should be clarified. The text should make clear that applications for non-material amendment under Section 96A are not covered by this requirement. Applications under Section 96A are by their nature non-material and do not create a new planning permission. It is therefore not appropriate to seek to extend Section 96A applications to require substantial changes to the section 106 agreement and review of viability.</p> <p>Supporting text paragraph 17.23 appears to suggest that for-profit Registered Providers will not be acceptable. For-profit RPs are subject to the same rigorous standards as other RPs, set and monitored by the government’s Regulator of Social Housing. Given current well publicised financial difficulties of traditional RPs, for-profit RPs offer an important additional source of housing funding and should not be excluded from the borough.</p> <p>Given all of the above, the following changes should be made to draft policy LP23:</p> <ul style="list-style-type: none"> • The strategic target for affordable housing in LP23(A) should be amended to the level which is evidenced to be viable in line with PPG methodology, having regard to the comments made above on the current BNPP viability assessment. • The affordable housing target in LP23(C) should also be amended as above. • The Fast Track route in LP23(D) should be amended to 35% with all other details of the Fast Track route in the policy and supporting text also amended to be in line with the London Plan. • Supporting text 17.23 should be amended to make clear that all Registered Providers (traditional and for-profit) will be acceptable. • Supporting text 17.24 should be amended to make clear that this does not apply to section 96a non-material amendments. 			
54	Chris Wheaton obo SGN Mitheridge [See also Row 127]	LP23				<p>Dear Planning Policy Team Wandsworth Local Plan Partial Review Regulation 19 Consultation – Representations Submitted on Behalf of SGN Mitheridge Ltd</p> <p>SGN Mitheridge Ltd has worked collaboratively with the Council for several years developing proposals for Wandsworth Gas Works and Calor Gas Centre, Smugglers Way, London SW18 1EG. SGN Mitheridge supports the Council’s aims to increase the delivery of affordable housing in the borough and has proposed 40% of homes as affordable within the Gas Works scheme, including 70% for social rent. Having reviewed the Regulation 19 Local Plan, SGN Mitheridge has prepared a number of comments indicated below and aimed at ensuring the policies are effective in delivering more homes in the borough. Quod and SGN Mitheridge would be pleased to engage further with the Council on these points if helpful.</p>	Given the points above, policies LP23 and LP24 should be amended to ensure consistency with the London Plan and that requirements enable deliverable schemes.	<p>Comments Noted.</p> <p>The Build Cost assumptions within the Whole Plan Viability Assessment are robust and consistent with BCIS data, which are based on tenders submitted for live developments. The use of BCIS data is advocated by the PPG.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The Housing Needs Assessment identifies an extremely high need for affordable housing across the plan period, up to 23,600 affordable homes, a majority of which are needed for social rented housing. As set out in the Housing</p>	

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						<p>Comments on the Regulation 19 Plan The table overleaf provides feedback on the draft policies as relevant to the type of brownfield regeneration development undertaken by SGN Mitheridge.</p> <p>LP23 Affordable Housing</p> <p>A2 (Tenure Mix)</p> <p>Whilst the aspiration to increase the social rent proportion is supported, this should be supported by robust viability evidence. At present the BNPP study supporting the plan appears not to envisage the quality and fire safety of buildings expected in the borough. For example, BNPP's study allows build costs of £2,163 to £2,555/m2 for medium / high density schemes and a nett:gross efficiency of 75 to 85%. The Council's Independent Assessor for the Gas Works scheme has arrived at build cost figures of £3,110 to £4,213/m2, reflecting the design agreed with the Council planning team and market testing of build costs. The building efficiency is anticipated to be no more than 70%, inclusive of fire safety / 2nd stair requirements. As such the BNPP study is presenting unrealistically optimistic costs and therefore viability.</p> <p>LP23 Affordable Housing</p> <p>D (Fast Track)</p> <p>SGN Mitheridge welcomes the GLA Fast Track route and is following this at the Gas Works site. Any change to the GLA approach requiring 35% affordable homes must be carefully considered, with regard to the viability points noted above and the aim to maximise use of the route. The GLA's recent Accelerating Housing Delivery practice note (December 2024) considered this issue, advising at paragraph 3.8 that the adoption of threshold levels above 35% by a small number of boroughs "risks the successful implementation of the London Plan threshold approach which is a matter of strategic concern for the Mayor. This has been raised by the GLA and will continue to be raised as an issue of general conformity with the London Plan at local plan consultations and inquiries."</p> <p>LP23 Affordable Housing</p> <p>17.23 (Registered Providers)</p> <p>Supporting text paragraph 17.23 appears to suggest that for-profit Registered Providers will not be acceptable. As Council officers are aware, it has been extremely difficult to</p>		<p>Background Paper, there are strong social and economic imperatives to plan to meet this need.</p> <p>The Council has specifically designed the policy to ensure it is effective and deliverable, as demonstrated through the evidence base. In particular, the Whole Plan Viability Assessment demonstrates that a significant number of development typologies would be viable at a 45% threshold, which is the threshold required under the Council's Fast Track Route. As set out in the Housing Background Paper, there is a strong correlation between the most viable typologies and the types of sites expected to contribute to the Borough's long-term housing supply, such that there can be overall confidence in the policy being deliverable for a significant proportion of developments. The policy also retains a Viability Tested Route which means that developments which cannot maintain viability whilst meeting the requirements of the policy can still receive planning permission. The Council also considers it important that deliverability is evaluated across a plan period and as such that it is important to avoid giving disproportionate weight to short-term market conditions when there is a fair and evidenced expectation that market conditions will improve across the plan period. For these reasons, the Council considers there to be no likelihood of the proposed policy having a materially negative impact on local housing supply or deliverability and considers the policy to provide an effective and proportionate mechanism for addressing developments which cannot meet its requirements in full. There are a number of examples of recent developments achieving or offering affordable housing percentages in excess of the existing 35% threshold which demonstrate a higher threshold can be achieved. Further analysis of the matters summarised above, and the overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p> <p>The Council wants to ensure that reasonable rents are maintained in perpetuity for its residents within all forms of affordable housing. 'For profit' affordable housing providers are a concern for the Council as they are less likely to provide the best value for money for residents. The Council will therefore seek to prioritise the delivery of affordable housing by Registered Providers who are not considered for-profit associations.</p> <p>The Council's housing enabling team works extensively with RPs and developers in the borough to ensure developers have multiple opportunities to engage with Registered Providers.</p>	

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							<p>identify RPs who are active in the borough and would be able to take homes at the Gas Works scheme. This is reflective of wider experience and well reported issues of RPs not taking on new homes. Given the above, it would be unhelpful to the delivery of affordable housing to further limit options by ruling out for-profit RPs. For-profit RPs are subject to the same rigorous standards as other RPs, set and monitored by the government's Regulator of Social Housing. Many for-profit RPs have excellent tenant satisfaction and many satisfied residents, they should therefore not be excluded from the borough.</p> <p>Given the points above, policies LP23 and LP24 should be amended to ensure consistency with the London Plan and that requirements enable deliverable schemes.</p>		

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55	Charles Rose obo City Planning Ltd	LP23		N		Justified, Effective	<p>RESPONSE FORM</p> <p>I write on behalf of several small and medium house builders and developers (“SMHBD”) who refurbish properties and redevelop sites in the borough for housing. They wish to object to London Borough of Wandsworth’s (“LBW”) review of their Regulation 19 Local Plan (“R19LP”), which seeks to require affordable housing from small sites below the current threshold of 10 or more homes (gross). This representation should be read in conjunction with our response to the Regulation 18 consultation dated 27th November 2023, which accompanies this representation.</p> <p>This representation first examines the implications of the recently published National Planning Policy Framework. This is followed by commentary on the Evidence Base that LBW have relied upon when preparing the draft policy, namely the Local Plan Viability Assessment produced by BNP Paribas Real Estate and LBW’s Housing Background Paper. Consideration is then given to the draft policy itself.</p> <p>a. National Planning Policy Framework (NPPF). The National Planning Policy Framework (“NPPF”) was revised and published in February 2025. As part of this process, the standard method for calculating housing need has been changed. This will result in LBW and London as a whole, having to deliver considerably more homes. LBW’s current London Plan target is 1,950 homes per annum. Under the standard method this would rise to 3,880 homes per annum. London’s currently target is 52,287 homes per annum. This will increase to 80,000 homes under the standard method. These are significant increases set against a housing delivery background of considerable under performance across the capital. The Inspector’s Report into the London Plan sets out that the London Plan should be revised immediately upon adoption. This has not taken place. Had that review taken place then LBW’s housing figures would be seen within the context of this standard method, which requires London to provide approximately 80,000 housing per annum. This is significantly above the current requirement of 52,287 units.</p> <p>If LBW and London are to achieve the housing that the capital and the country desperately needs, they will need to be far more permissive in their approach to all forms of housing delivery, including those below 10 units. Against this background and as set out in this representation, the introduction of a small sites affordable housing policy (“SSAHP”) will compromise both LBW’s and London’s ability to meet and exceed their housing targets, hence why paragraph 65 of the NPPF expressly states that <u>the provision of affordable housing should not be sought for residential developments that are not major</u></p>	<p>Comment Noted.</p> <p>Requiring an affordable housing contribution from small sites is considered to be justified on the basis of the high local need for affordable housing. The construction of the policy is similar to a large number of other London-based Local Plans which have also been justified on the basis of high local need. There is clear precedent across London that high local need may justify an approach which does not accord with national policy relating to small site affordable housing contributions.</p> <p>The value of the proposed small site contribution has been calculated using a recommended formula derived from the Whole Plan Viability Assessment. The derivation of the value, and the components of this formula, is set out clearly in the Housing Background Paper.</p> <p>It is the Council's intention to apply any small sites viability assessment process proportionately, in light of the need to avoid delays or administration that is disproportionate to the size of site or wider costs of delivering the site. In taking a simple, evidence-based approach to establishing the value of the small site contribution, and applying a proportionate viability assessment process for those sites which cannot viably provide that contribution, the Council does not consider that there will be a material impact on small sites' delivery in the Borough.</p> <p>Further information on the application of the small sites viability assessment process would be set out in a planned Affordable Housing SPD.</p> <p>In relation to small site typologies, the Council have assessed the most common small sites in the borough to ensure a realistic range of sites has been provided and the tested typologies do include schemes of 2 and 4 units. It would not be appropriate or proportionate to model an exhaustive range of small site typologies, however the site typologies modelled include the most common sites. More information on small sites and the reasoning for seeking contributions is available within the Housing Background paper.</p> <p>The Council understands the challenges with delivering housing on small sites and is one of the key drivers for the calculations behind the small sites contribution being based on 15% affordable housing, rather than applying a similar affordable housing requirement as on major sites.</p>	

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						<p>developments (our emphasis). This policy was repeated in the earlier iterations of the NPPF, including the 2021, September 2023 and December 2023.</p> <p>b. Evidence Base for SSAHP</p> <p>This section first discusses missing evidence and then goes on to assess the two key documents that have informed the preparation of the SSAHP.</p> <p>Missing Evidence</p> <p>LBW despite having recently reviewed and adopted their Local Plan in July 2023 LBW have chosen to introduce a SSAHP and amend other selective policies. In doing so, they have had no regard to the impact that this policy will have on other policies within their adopted local plan. As part of the 2023 Local Plan review, LBW proposed changes to their conversion policy. They produced a Residential Conversion Policy and Meeting the Small Sites Housing Target Topic Paper dated April 2022. The purpose of this document was to understand how these revisions would affect their small sites targets and what the implications would be on housing delivery. No such assessment has been undertaken in this review despite this draft policy having more far-reaching implications on housing delivery against a backdrop of increasing housing targets.</p> <p>Local Plan Viability Assessment</p> <p>LBW instructed BNP Paribas to prepare a Local Plan Viability Assessment ("LPVA") in order to inform their draft SSAHP. As set out below, this assessment is flawed and unsound for several reasons. This section assesses the relevant sections in the LPVA in turn, where relevant.</p> <p>Assumptions on Development Typologies</p> <p>Paragraph 1.9 of the LPVA accepts that a small number of typologies are not viable without any affordable housing contribution, so a flexible approach will need to be incorporated into any emerging policy to enable these sites in these circumstances to</p>		<p>The Local Plan Viability Assessment does not focus on the loss of gardens to provide small sites, it purely refers to this as one of a number of different site types that may contribute forwards small site delivery over the plan period.</p> <p>It is also important to be mindful of the new NPPF which adds additional emphasis to the importance of delivering housing on brownfield sites since the adoption of the Local Plan in 2023.</p> <p>In relation to the Benchmark Land Value of backland sites, it is important to consider the approach to determining the BLV set out within National Planning Practice Guidance, which is on the basis of the existing use value, plus premium. Therefore, within the calculation of the viability the price paid for the land is not a consideration within the viability assessment.</p> <p>The calculation of the financial contribution is set out in detail within the Housing Background paper, showing the different methodologies that have been applied. The Council have sought to apply the most common site small site types that have been completed resulting in the typologies included within the viability assessment.</p> <p>Conversions are far more site specific and some are more complex and there remains the opportunity for applicants to submit viability information as part of any small site application to justify if a contribution is not viable in that specific circumstance.</p> <p>Further analysis of the viability assessment is set out in the Whole Plan Viability Assessment and Housing Background Paper.</p> <p>Requiring an affordable housing contribution from small sites is considered to be justified on the basis of the high local need for affordable housing. The construction of the policy is similar to a large number of other London-based Local Plans which have also been justified on the basis of high local need. There is clear precedent across London that high local need may justify an approach which does not accord with national policy relating to small site affordable</p>	

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						<p>come forward without a contribution. Therefore, this approach will result in a proportion of developments having to negotiate affordable housing contributions. However, when you examine the typologies that have been assessed they do not represent the most common types of small site developments.</p> <p>For medium density flatted schemes, only schemes of 5, 7 and 9 have been assessed. No assessment has been made for schemes that deliver 2, 3 or 4 units, which are far more common. As set out in Table 9 of LBW's Annual Monitoring 2022-23, between 2006/7 and 2022/3 of the gross 5,589 converted units completed, the net total was 3,320 units converted. The net to gross ratio would therefore indicate that a large proportion of these schemes were for small numbers of units. No assessment of these smaller sites (five flats gross and under) has been undertaken, so there is no evidence to demonstrate that these types of small schemes would be viable. As we can see from the evidence contained in Tables 6.3 and 6.10 of the LPVA, small sites yielding two houses (gross) are highly sensitive and in many circumstances would be unviable under the draft SSAHP.</p> <p>Paragraphs 6.16 – 6.23 specifically comments upon affordable housing small sites contribution. Paragraph 6.16 states that the economics of providing 10 units are not markedly different from units providing a lower quantum. This is disputed. Small sites are often much more economically sensitive. Small schemes delivering less than 10 units still have to produce a similar level of documentation as larger schemes. They also have similar professional and consultancy fees, whilst having to pay higher costs for building supplies and fixtures and fittings due to the scale of development (see Appendix 4 of the LPVA). Moreover, they can be far more speculative. Reducing a small scheme by one or two units can have a much more profound effect on GDV than a larger scheme. These are all very important matters SMHBD have to consider before embarking on a development and this risk has not been factored into this assessment.</p> <p>When justifying their approach to SSAHP and their development typologies, paragraph 6.19 of the LPVA sets out that the bulk of sites that come forward for redevelopment will be back land, former garage sites, part of large back gardens and small storage yards. However, these assumptions are flawed because they have had little or no regard whatsoever to Local Plan Policy for the following reasons:</p> <ul style="list-style-type: none"> • Paragraph 14.5.1 of the Local Plan states that development on back land sites often involves the loss of garden land. Policy LP7E states that loss of garden land will only 		<p>housing contributions.</p> <p>The Council has prepared its plan under transitional arrangements set out in the National Planning Policy Framework (2024). As a matter of principle, it is improper to apply that version of the NPPF to the policy. Nevertheless, the Council's Housing Background Paper sets out a clear justification for the policy approach in the context of national policy, need, viability and wider implications for housing supply.</p> <p>Conversions are highly difficult to accurately test as the circumstances are too heterogeneous, instead the Council has sought to leave a much larger amount of headroom when considering small sites to allow for different scenarios as well as, the small sites policy allowing applicants to submit viability evidence if there are site specifics that would make the site unviable, this would certainly be the case for more complex conversions. The Council have viability officers in-house to support applicants through the process and we do not anticipate significant impacts on time in determining applications due to having this resource available, this process is no different to that of discussions with design colleagues or sustainability officers which would have all been considered as part of the application process for the site referred to "LPA ref: 2024/4045".</p> <p>In relation to legal agreements, the Council already have draft Unilateral Undertaking templates available to speed up the process and is a similar approach to that used by the viability team within Richmond which also seeks affordable housing contributions on small sites.</p> <p>Although the Inspector did decide to remove the small sites contribution in Lambeth there have been many other London borough that have included small sites contributions, including; Tower Hamlets, Hackney, Southwark and Brent in addition to the earlier agreed small site contributions from; Islington, Camden and Richmond, showing there is a recognised justification for such an approach within London boroughs.</p>	

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						<p>be considered acceptable in exceptional circumstances (our emphasis).</p> <ul style="list-style-type: none"> • Large back gardens need to provide exceptional circumstances for them to be redeveloped for housing (Policy LP7E) (our emphasis); and • Policy LP34D2 of the Local Plan protects small storage yards from redevelopment to housing. This is a new policy that was introduced in the adopted Local Plan (2023). The implications of this policy were never assessed against LBW ability to meet its small sites targets in the same way residential conversions were (see Residential Conversions Policy and Meeting Small Sites Housing Target Topic Paper April 2022). Therefore, it is too soon to see how it has affected small sites delivery (our emphasis). <p>In addition to this, former garage sites are often in multiple ownerships and therefore not readily available for redevelopment. This equally applies to back-land and large back garden sites.</p> <p>Paragraph 6.19 goes onto state that these types of sites have benchmark land values towards the lower end of the range which mean that most small sites should be able to accommodate the full financial equivalent of 50% affordable housing.</p> <p>Therefore, in order to justify their case for SSAHP and the development typologies, the LPVA has chosen types of developments that have low benchmark land values so they can on paper provide a financial contribution. This approach is completely flawed because these types of developments are not supported by Local Plan policy. As such, they are not realistic development typologies in the borough. There are also uncommon.</p> <p>This is evidenced in Table 18 of LBW's AMR. A meaningful proportion of units each year come forward through conversion (9,073 units gross between 2017/18 and 2022/23) Conversions include houses to flats, flats to flats, houses to houses, change of uses and vertical extensions. These types of development are far more common and deliver far higher numbers of units than the type of developments the LPVA has chosen to assess, which are not specifically included in the AMR. Equally, conversions have far higher benchmark land values than the developments chosen in the LPVA.</p> <p>Against this background, paragraph 3.5 of the LPVA states:</p> <p>"Ultimately, the landowner will make a decision on implementing a project on the basis of return and the potential for market change, and whether alternative developments might yield a higher value. The landowner's 'bottom line' will be achieving a residual land value that sufficiently exceeds 'existing use value' or another appropriate benchmark to make development worthwhile. The margin about existing use value may be considerably different on individual sites, where there might be particular reasons why the premium to the landowner should be lower or higher than other sites."</p> <p>In terms of the types of developments included in conversions, it is not just house builders landowners are looking to sell to. For example, in the case of houses, house builders are competing with endusers and (C4 hmo) landlords, as well as other developers.</p>			

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						<p>Wandsworth is a very desirable place to live with inter alia good schools and parks. It attracts all household types. Under the proposed policy, a house suitable for conversion to three flats would have to pay a commuted sum of £150,000. This puts housebuilders at a considerable disadvantage when compared to other potential purchasers who would not be liable for this payment. No analysis has been undertaken regarding these very common scenarios and the implications a SSAHP may have on other Local Plan objectives such as biodiversity, energy and sustainability measures, which will not be delivered if planning applications are not required. Instead, the LPVA have assessed largely unsupported and uncommon forms of developments with very low benchmark land values that will not attract competition from other land users.</p> <p>Report Recommendations</p> <p>Finally, paragraphs 6.20-6.23 of the LPVA sets out the three main approaches to calculating payments in lieu. The third approach is the tariff based system that LBW have adopted. No sum is quoted or justified within the LPVA and there is no mention of the £50,000 payment.</p> <p>Local Plan Partial Review Housing Background Paper</p> <p>In response to the LPVA, LBW published their Local Plan Partial Review Housing Background Paper ("LPPRHBP"). This representation assesses the LPPRHBP section by section, where relevant.</p> <p>The Executive Summary notes in paragraph 12 that the a critical element in policy development is to ensure that the proposed policy approach is deliverable and goes on to state in paragraph 13 that 90% of the small site typologies tested within 9 different value areas across the borough, were viable at 15% affordable housing. This figure is disputed. The typologies chosen are uncommon, not supported by planning policy and have low benchmark land values. As such, they do not properly reflect common development types supported by policy and/or with high benchmark land values. Paragraph 13 goes on to state that the policy retains flexibility and those sites that cannot genuinely afford to meet the requirements will instead be subject to the maximum viable contribution. What this representation demonstrates however is that LBW have wholly under-estimated the number of schemes that will either be forced to enter into negotiations or worse still those schemes that fail to get off the ground because of the additional risks, costs and timescales that will be incurred as a result of having to negotiate.</p> <p>Section 5 of the LPPRHBP provides a summary of the National Planning Policy position. This section ignores paragraph 65 which expressly states that affordable housing should not be sought on minor housing developments. The draft SSAHP is directly in conflict with national guidance.</p> <p>Section 6 of the LPPRHBP provides a summary of the London Plan. The section does not</p>			

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						<p>make reference to Policy H2 which deals with Small Sites. Paragraph 4.2.1 of the London Plan states that increasing the rate of housing delivery from small sites is a strategic priority. Paragraph 4.2.2 identifies that increasing housing output of this scale can also help support a number of related housing and planning policy objectives including reviving the role of small and medium-sized developers in delivering new homes in London. The draft SSAHP will only serve to reduce the rate of housing delivery, particularly those common developments with a high benchmark land value. It will also increase the risk and make the process more complex for small and medium sized developers who do not have the experience or resources that larger house builders have. These factors and the implications that the draft SSAHP will have on small sites delivery has not been properly or comprehensively assessed.</p> <p>This is discussed in paragraph 9.3 of the LPPRHBP, which states that because there has been no material change in circumstance (e.g. a new London Plan) that the Council has not sought to review the overall housing strategy or requirements within this Partial Review. This is clearly no longer the case. The recently published NPPF has changed the standard method, which in turn will significantly increase housing numbers across London at a time when London is failing to deliver enough housing. Policy changes took place to the development typologies referenced in the LPVA in the adopted Local Plan (2023), including back land development, garden land developments and employment yards. The implications of these policy changes were never taken into consideration when considering small sites delivery in the same way residential conversions were. Implementing a contrived SSAHP will simply compound small sites delivery further. Increasing housing delivery from small sites is a London Plan strategic priority. Therefore, introducing a policy that has not assessed these implications is ineffective and therefore unsound.</p> <p>Section 16 of the LPPRHBP assesses the Rational for Approach to Securing Affordable Housing from Small Sites. Paragraph 16.2 states that there is a partial conflict with paragraph 64 of the NPPF. The relevant paragraph in the NPPF that advises against seeking an affordable housing contribution on minor housing developments is paragraph 65. The draft SSAHP is fully in conflict with this policy, not partially. Paragraph 16.3 lists several London Boroughs that have adopted a small sites affordable housing policy. None of these policies have been adopted since the publication of the NPPF and the change to the standard method. Moreover, the LPPRHBP has had no regard whatsoever to the Inspector's comments in relation to the Lambeth Local Plan, where he deleted their small sites policy. LB Lambeth is a neighbouring borough. Several reasons were given by the Inspector for deleting the policy, including creating disputes, protracted negotiations and delays, which resulted in a marked effect on determining timescales and it provided one more hurdle for small sites developers to attempt to jump over. These are all relevant considerations that have not been taken into consideration by LBW.</p> <p>In addition, a very large proportion of LBW's small housing developments currently do not require applicants to enter into legal agreements. Legal agreements delay the determination of applications by up to six months. They also incur additional legal and</p>			

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						<p>professional fees. None of these cost and delay implications have been considered by LBW. These delays mute small site housing delivery.</p> <p>Paragraph 16.7 of the LPPRHBP comments upon the Regulation 18 consultation and states that LBW sought views from smaller developers but their concerns were largely made in principle and in the absence of a quantified contribution or formula. This criticism is unfair as no methodology was put forward for small developers to comment upon. Moreover, those representations set out the difficulties that small developers will face if such a policy was introduced including increased risk, timescales and cost. These were issues the Lambeth Inspector cited. When he recommended the deletion of LB Lambeth's small site's policy, he did not rely upon formulas to do so.</p> <p>Paragraph 16.8 of the LPPRHBP identifies some of the shortfalls of a formulaic approach, including complexity, volatility and that it requires more specialised support and resource. These are valid concerns. However, adopting a fixed price per dwelling approach that does not rely upon realistic and appropriate development typologies will only serve to increase the number of disputes and force negotiations down the formulaic approach. Despite paragraph 16.9 of the LPPRHBP setting out that a rigorous approach was taken based on the most common small site typologies, as set out previously, this clearly has not taken place. It is disconcerting that LBW's planning policy team, who produce the LPPRHBP, have not acknowledged that the small site typologies relied upon by the LPVA are not the most common but also that many are not supported by Local Plan policies, so are wholly unrealistic.</p> <p>Those typologies also have low benchmark land values hence why they are able to demonstrate that a £50,000 per unit contribution is viable, as set out in paragraph 16.12 of the LPPRHBP. However, for the reasons set out in the representation, LBW's position in paragraph 16.12 that this will not place a burden on the deliverability of small sites within the Borough is completely unfounded and baseless.</p> <p>c. Proposed Policy and Supporting Text</p> <p>In terms of the policy itself, for the reasons set out above, the evidence that has informed the formulation of the SSAHP is flawed and not sound. Therefore, the resultant policy is neither reasonable nor properly justified having regard to the NPPF's soundness tests. It has disregarded important typologies of small site developments, such as conversions. Identifying these types of developments as "exceptional" therefore is plainly incorrect and flawed. Moreover, it justifies a tariff based contribution of £50,000 on the viability of developments that specifically have low benchmark land values. Such an approach is biased and unfairly prejudices the SMHBD that both the NPPF and the London Plan are specifically targeting and encouraging to deliver housing that London so acutely needs.</p> <p>We also object to the assessment being made based on gross numbers of units. This immediately puts the starting point for any application for a new unit at £50,000. This will</p>			

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						<p>discourage many development types. For example, the replacement of existing dwellings would incur an immediate charge for the home owner. Replacement new build dwellings bring about significant energy and sustainability benefits. Adding a £50,000 charge to such a development would encourage the home owner to go down the extension route, which would trigger less planning benefits, including energy and sustainability improvements.</p> <p>By way of an example, City Planning has recently obtained planning permission (LPA ref: 2024/4045) for the conversion of a property which contained five units into six units. This resulted in significant planning benefits including the refurbishment of a rundown property, creating flats that meet housing standards, 50%+ reduction in CO2 emissions, bike and waste storage provision, as well as biodiversity and landscaping enhancements. The SSAHP starting point would be a commuted payment of £300,000 for one additional unit. In such circumstances, the housebuilder would simply not proceed with the development. They would just refurbish the existing flats and sell them. There would be no requirement for them to do any of the planning benefits the current development creates.</p> <p>This view is given in the knowledge that if they challenged the payment, this adds considerable uncertainty to the process, complexity and costs as the policy forces them down the London Plan viability route. It would delay the determination of the application whilst negotiations took place, resulting in additional professional fees to represent not only the housebuilder but the council, and it would also incur legal fees for a S106 agreement (both the housebuilder and the Council). Moreover, expecting SMHBD to have to go down the London Plan affordable housing policy route for such small developments places an unreasonable burden on them. It would require them to undertake up to four reviews, quadrupling the costs.</p> <p>It also makes the whole process hugely complex and lengthy. The legal agreement process alone would delay the development by three to six months. In total, if the housebuilder chose to challenge the affordable housing payment, it is likely to increase the determination of the application by at least six months (at least three months for negotiation and at least three months to agree the legal agreement). This would delay the rate of development, increase holding costs and also increase the likelihood of appeal. Evidently, delaying the rate of development was a concern of Lambeth's Local Plan Inspector when he recommended their small sites policy to be deleted. LBW very rarely require a legal agreement for small site developments. A SSAHP would immediately trigger a legal agreement and therefore would instantly delay all small site developments in the borough by at least six months. This type of conversion development is common place i.e. reconfiguring existing conversions/blocks of flats and is identified in LBW's AMR. It has not been assessed for viability purposes. One of the major advantages of conversion developments is that they deliver additional housing quickly and providing a continuous pipeline. The policy would completely stymie this form of development.</p>			

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							<p>d. Conclusions</p> <p>In response to the SSAHP, the following points should be considered:</p> <ul style="list-style-type: none"> • The policy is directly in conflict with the NPPF which states that affordable housing contributions should not be sought from residential schemes of less than 10 units. • The SSAHP is premature. The Local Plan has very recently been reviewed in a relatively holistic manner. The SSAHP has been justified independently from the rest of the Local Plan (see paragraph 9.3 of the LPPRHBP). No consideration has been given to the impact this policy will have on small site delivery nor other Local Plan policies, for example those that seek carbon reduction/biodiversity improvements. Moreover, no consideration has been given to the implications it will have on achieving the new standard method statement set out in the NPPF and the implications it will have on housing targets. Finally, a review of the London Plan will commence shortly. This review and a review of the whole plan should be undertaken in alignment with the London Plan that will set new and increased housing targets and small site targets for the borough. • The evidence base relies upon developments that are not supported by Local Plan policy, and which have very low benchmark land values. These are not typical or common developments in the borough. As such, the viability methodology is flawed. • No consideration has been given to conversion schemes (see AMR) which are very common in the borough and deliver a consistent and reliable number of units each year. These types of development will be under threat by the proposed policy because they typically have a high benchmark land value and attract other uses including landlords and homeowners. • If these developments are to continue to come forward, viability will have to be tested due to their high benchmark land values. The proposed policy forces them down the London Plan affordable housing policy route. This will result in increased costs, timescales for delivery, complexity and will create huge uncertainty. It will create an environment that is not conducive to delivering the amount of housing London requires. • It will hinder the revival of small and medium-sized developers and reduce the rate of housing deliver from small sites which is a London Plan strategic priority. <p>I trust these comments will be taken on board when reviewing the draft SSAHP and I look forward to receiving confirmation these comments have been received.</p>		

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56	Michael Bear	LP23					<p>Setting arbitrary 50% social/affordable housing targets will suppress supply. Any suppression of supply at this point is tipping more water into an overflowing glass - the system continues to break and people can't get in other than those already in it and the meagre few selected by the council. I.e. if you're not uber rich or on benefits there's nothing for you.</p> <p>Cost of housing in Wandsworth is so high BECAUSE the council restricts the supply. The solution is not further interventions from the council to create more reasons to say no to building more housing. It's totally backwards.</p> <p>Just pulled a statistic from the wandsworth.gov website that 'According to the Government's figures 1,377 new homes were built in Wandsworth between October 2020 and October 2021, of which 423 were classed as affordable homes.'</p> <p>The idea that after building a measly 1.5k new homes in a highly desirable area you're complaining that it's evil developers that are the cause of high property prices is absolutely laughable. I am looking to buy my first home soon but I have been priced out of Wandsworth and will have to move to zone 5 just to get a 1 bed, because my council have prioritised signaling over action. The tepid bath of managed decline doesn't even cut it.</p> <p>BUILD MORE HOMES! That is the simple solution that every young person is now desperate for. If you want to make housing in Wandsworth more affordable start allowing 10,000 or even 20,000 properties to be built a year, increase your council tax finally to invest in more social housing, and see what happens. Councils simply can't be allowed to pander to old residents who show up to every meeting and veto any new development.</p>		<p>Comments Noted.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The Housing Needs Assessment identifies an extremely high need for affordable housing across the plan period, up to 23,600 affordable homes, a majority of which are needed for social rented housing. As set out in the Housing Background Paper, there are strong social and economic imperatives to plan to meet this need.</p> <p>The Council has specifically designed the policy to ensure it is effective and deliverable, as demonstrated through the evidence base. In particular, the Whole Plan Viability Assessment demonstrates that a significant number of development typologies would be viable at a 45% threshold, which is the threshold required under the Council's Fast Track Route. As set out in the Housing Background Paper, there is a strong correlation between the most viable typologies and the types of sites expected to contribute to the Borough's long-term housing supply, such that there can be overall confidence in the policy being deliverable for a significant proportion of developments. The policy also retains a Viability Tested Route which means that developments which cannot maintain viability whilst meeting the requirements of the policy can still receive planning permission. The Council also considers it important that deliverability is evaluated across a plan period and as such that it is important to avoid giving disproportionate weight to short-term market conditions when there is a fair and evidenced expectation that market conditions will improve across the plan period. For these reasons, the Council considers there to be no likelihood of the proposed policy having a materially negative impact on local housing supply or deliverability and considers the policy to provide an effective and proportionate mechanism for addressing developments which cannot meet its requirements in full. There are a number of examples of recent developments achieving or offering affordable housing percentages in excess of the existing 35% threshold which demonstrate a higher threshold can be achieved. Further analysis of the matters summarised above, and the overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p>

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57	Jo Anderson obo Citizens Advice	LP23					<p>I am writing on behalf of Citizens Advice Wandsworth to submit representations to the Wandsworth Local Plan Partial Review and specifically to the proposed review of Policy LP23 of the Local Plan.</p> <p>Representation to Wandsworth Local Plan Partial Review – Update of Policy LP23 Affordable Housing Citizens Advice Wandsworth (CAW) strongly support the proposed amendments to Local Plan Policy LP23 in so much as they aim to increase the provision of social rented housing. CAW provide advice and support to residents of the borough who require help with a variety of issues. One of the primary advice areas is housing. We provide advice to residents living in private and socially rented housing, and those who are homeless. Figure 1 shows the percentage change in the number of people who have come to us to seek advice on actual homelessness (includes illegal eviction, rough sleeping, landlord eviction action, and local authority possession action) and threatened homelessness (including domestic abuse, possession action, no recourse to public funds) over a 5 year period (from October 2019 to September 2024). It is clear that there has been a slow and steady increase in clients seeking advice on potential or actual homelessness with peaks in November 2023 and July 2024 of over 150%.</p> <p>Figure 2: Private Rented Sector Advice Issues October 2019- September 024</p> <p>There are some anomalies in the data. A drop in homeless cases can be seen in 2020. This reflects the Covid pandemic and the ban on evictions and the furlough scheme that were in place during this period. As the country emerged from the pandemic and the Cost</p>		Support Noted.

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						<p>of Living Crisis began to bite in 2022 and 2023, a sharp increase in the need for housing and homelessness advice is evident. This is reflective of the national trend of a worsening housing crisis which is well documented elsewhere and shows a steady increase in homelessness and housing need.</p> <p>Figure 2: Private Rented Sector Advice Issues October 2019- September 2024</p> <p>Figure 2 shows advice given to clients relating to Private Rented Sector housing. This includes issues such as possession action by private sector landlords, disrepair, illegal eviction and suitability. Again, it can be seen that during the pandemic when legal measures were in place to protect tenants, the number of clients accessing our service remained relatively stable. However, as we have emerged from the pandemic the numbers have increased significantly and by as much as 287% in September 2023. The lack of secure, safe and affordable private rented housing is a significant issue for our clients. A stronger and more available social rented housing sector could make a significant difference to those who are forced currently to rely on inadequate housing in the private rented sector.</p> <p>It is important to remember that the amount of people advised is limited by the number of staff and volunteers at our service. It cannot therefore be a completely objective and conclusive reflection of total need in the borough. The data is significantly affected by service capacity and demand has consistently outstripped supply of advice during this period.</p> <p>CAW are supportive of Wandsworth Council Policy to increase the stock of genuinely affordable housing for social rent. We are specifically supportive of the proposed changes to policy LP23 which seek to ensure provision of at least 50% of all new housing development to comprise affordable homes and with a 70% requirement for socially rented</p>			

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							properties. I am also attaching the above as an attachment to this email if it makes it easier to read this way.		
58	John Mcelligott	LP23					<p>Dear Wandsworth Council,</p> <p>While I understand the political stance in setting a 50% social housing requirement on new developments in the Borough I do not see it as a commercially sensible position for the Council to adopt.</p> <p>Private developers will only get involved in development if there is a profit opportunity for them and in my view the Council's policy is a major barrier to development when the U.K. government wants to stimulate development and have more homes built. So the Council by adopting its 50% policy is effectively blocking what the government is trying to do.</p> <p>To encourage development and also to add to the social housing stock a threshold of 20% or less would actively encourage development and would be more beneficial. My suggestion would be for developers to pay into a Council Housing Build fund 20% of the cost of any development they obtain planning and BSR permissions to build.</p> <p>The Council should ring fence this fund and use it to build new environmentally sound housing.</p>	<p>My suggestion would be for developers to pay into a Council Housing Build fund 20% of the cost of any development they obtain planning and BSR permissions to build. The Council should ring fence this fund and use it to build new environmentally sound housing.</p>	<p>Comment noted.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p> <p>Setting a lower threshold is not considered to be appropriate. This would lead to the delivery of less affordable housing overall, harming the ability for the Borough's significant need for affordable housing to be met, and mean that developments which would viably afford to contribute more would not be required to. Furthermore, whilst payments in lieu are acceptable in certain circumstances, they are generally not considered to be as effective a delivery mechanism as on-site delivery.</p>

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59	Reginald Hoare	LP23					<p>Dear Sir / Madam</p> <p>Local Plan Partial Review: Regulation 19 consultation</p> <p>I am writing to you regarding the Partial Review of the Local Plan which includes a review and update of your planning policies.</p> <p>Your proposed target of 50% of new homes built in the borough to be affordable is wishful thinking. Merely mandating it, doesn't mean it's achievable. In fact, quite the opposite is likely to happen.</p> <p>Your policy presupposes that developers who wish to build in Wandsworth (as has been the case for many decades) will continue to do so on these new terms. Why would they? Here's why not:</p> <ul style="list-style-type: none"> • Commercially Wandsworth is competing with every other location in the UK, where if the target is less than 50%, developers will logically choose to move their business away to take advantage of less regulation (indeed sensible councils will compete Wandsworth out of the market, by marketing their lower regulation) • The amount of affordable housing mandated is directly proportional to the profitability of a development, especially so where the land value is very high as in Wandsworth (ie higher land values must translate directly into higher selling prices in order to provide developers with an acceptable profit / return on capital - this is basic economics); so the higher you mandate affordable, the less profitable the development becomes, the less likely it is the developers will bother with Wandsworth. At say 10-20% they can live with it, probably. At 50%, not so much. Developer capital will allocate itself along the path of least resistance, this is basic economics. <p>As one commentator has put it in response to your proposed policy, 0% of 0 is 0. Let me spell that out: if you target 50%, no one will choose to develop in Wandsworth, so you'll end up with zero affordable dwellings being built. Not 50%, 0%. 0% of 0. That doesn't help anyone, not least those who need affordable housing. And that will be on your watch.</p> <p>I therefore strongly recommend you reconsider your target, it needs to be a lot, lot lower for any affordable housing to actually be built.</p>	<p>I therefore strongly recommend you reconsider your target, it needs to be a lot, lot lower for any affordable housing to actually be built.</p>	<p>Comment noted.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p> <p>Setting a lower threshold is not considered to be appropriate. This would lead to the delivery of less affordable housing overall, harming the ability for the Borough's significant need for affordable housing to be met, and mean that developments which could viably afford to contribute more would not be required to.</p>
60	Linda Corkill	LP23					<p>I cannot see how a requirement for 50% of a development to be affordable will increase the supply of affordable housing.</p> <p>Surely developers will say that unless they can retain a higher percentage of properties in their development for sale at market prices, the development will not be sufficiently profitable and they will take their plans elsewhere.</p> <p>As a result, Wandsworth will lose out on Council tax and job opportunities. The requirement for affordable housing should be at a lower percentage.</p>	<p>The requirement for affordable housing should be at a lower percentage.</p>	<p>Comments Noted.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p> <p>Setting a lower threshold is not considered to be appropriate. This would lead to</p>

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								the delivery of less affordable housing overall, harming the ability for the Borough's significant need for affordable housing to be met, and mean that developments which could viably afford to contribute more would not be required to.	
61	Capucine Deroulede	LP23		N		Positively prepared; justified; effective; consistent with national policy	<p>Dear Wandsworth Planning Team</p> <p>I am writing to you in relation to the proposed changes related to the Affordable Housing requirements. Below are my thoughts:</p> <p>Soundness</p> <p>1. Positively prepared: just curious to know if there is any evidence of any other borough having implemented this change and it has been successful? Also, the definition of 'Small Sites' and 'Major Developments' (10 dwellings or more) should be revisited because there are many potential developments that would sit between the two and concessions should be given to those developments - imposing a 50% affordable housing on a block of say 40-50 flats is not economically viable.</p> <p>2. Justified: there is a shortage of housing, not just affordable housing so why do we insist on such a great increase in affordable housing? This proposal will most likely result in fewer not more affordable housing given the higher target will dissuade many developers from building. As much as this proposal is well-intended, it is not fully thought through - the focus seems to be all about the result (i.e. increase in affordable housing) but no thought seems to have been given about the actual delivery of it? Developers may have the reputation of being greedy, but at the end of the day they also need to make money to employ pay hard working employees, materials, planning applications, compliance with new fire regs etc. It all adds up very quickly...</p> <p>3. Effective: taking into account the current context (including high construction costs and high interest rates), it is already so difficult to build any development and so imposing additional requirements would make the great majority of schemes unviable and that is not a good outcome for anyone.</p> <p>4. Consistent with national policy: sustainable development is at the core of the National Planning Policy Framework. This includes: economic, social and environmental objectives. This proposal goes against the economic and social objectives as (i) it is disincentivizing developers (all sizes) from building new homes and so land is not being put to good use and (ii) as a result of there being no new / much fewer homes, there is simply no / little community.</p> <p>A recent example in the borough is the regeneration of Nine Elms and Battersea Powerstation - today this is an achievement that has drawn a lot of worldwide attention which the borough should be proud of. It was largely possible because there were economic drivers that propelled the development in the area at a time where planning</p>	<p>The definition of 'Small Sites' and 'Major Developments' (10 dwellings or more) should be revisited because there are many potential developments that would sit between the two and concessions should be given to those developments - imposing a 50% affordable housing on a block of say 40-50 flats is not economically viable</p>	<p>Comments Noted.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The Housing Needs Assessment identifies an extremely high need for affordable housing across the plan period, up to 23,600 affordable homes, a majority of which are needed for social rented housing. As set out in the Housing Background Paper, there are strong social and economic imperatives to plan to meet this need.</p> <p>The Council has specifically designed the policy to ensure it is effective and deliverable, as demonstrated through the evidence base. In particular, the Whole Plan Viability Assessment demonstrates that a significant number of development typologies would be viable at a 45% threshold, which is the threshold required under the Council's Fast Track Route. As set out in the Housing Background Paper, there is a strong correlation between the most viable typologies and the types of sites expected to contribute to the Borough's long-term housing supply, such that there can be overall confidence in the policy being deliverable for a significant proportion of developments. The policy also retains a Viability Tested Route which means that developments which cannot maintain viability whilst meeting the requirements of the policy can still receive planning permission. The Council also considers it important that deliverability is evaluated across a plan period and as such that it is important to avoid giving disproportionate weight to short-term market conditions when there is a fair and evidenced expectation that market conditions will improve across the plan period. For these reasons, the Council considers there to be no likelihood of the proposed policy having a materially negative impact on local housing supply or deliverability and considers the policy to provide an effective and proportionate mechanism for addressing developments which cannot meet its requirements in full. There are a number of examples of recent developments achieving or offering affordable housing percentages in excess of the existing 35% threshold which demonstrate a higher threshold can be achieved. Further analysis of the matters summarised above, and the overall justification for the policy approach in relation to housing need,</p>

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							regulation was sensible. Those developments have resulted in an increase in revenue for the Council via council tax, provided wider social benefits for all people to enjoy through new public realms (i.e. green spaces which contribute towards the environmental objective of the National Planning Policy Framework) and resulted in an increased footfall which then spends money in local cafes, restaurants etc. As always, finding the right balance between what is morally right and what is economically viable is important.		<p>housing supply and viability are set out in detail in the Housing Background Paper.</p> <p>A number of other London based local authorities have Local Plans with similar affordable housing policies. These are analysed further in the Housing Background Paper.</p> <p>The definitions of 'Small Sites' and 'Major Developments' are considered to be robust, defined by numbers of housing units. There are not considered to be residential developments which would not fall into one or the other category.</p>
62	Simon Taylor	LP23					<p>Hello</p> <p>I am writing to express my support to the Wandsworth planning rules to have 50% of new houses to be social housing. We need to make sure that all of these new social houses are given for local people and families who need them and not allowed to be sold off or rented out like many built before</p>		Support Noted. The process through which social houses are allocated is not directly within the scope of the Local Plan Partial Review.
63	Robert Farley	LP23		N			<p>These proposals are not sound. They are far too onerous on developers, and dis-incentivise them from building the homes we need. Leaving the housing mix supply to the market to determine would be far more efficient than you give it credit for.</p> <p>The Plan should be far less prescriptive, particularly when it comes to the proposal to make the developers of Major Developments to deliver 50% of all habitable rooms as affordable housing. Allowing developers to build the properties they want to build – even if they are more premium in nature – would allow high-paying renters to move in, and cheaper properties become available all the way down the housing supply chain.</p> <p>I say this as someone paying [redacted] in rent on a below-median salary. I would not be renting these luxury flats myself, and do not stand to gain directly. But if you allow others to rent them, then more slack is allowed in the rest of the market. If you force the creator of a product to sell a large proportion of their stock at an artificially reduced rate in a certain area – ie Wandsworth - you will create a strong disincentive to build new product in that area, and they will instead build elsewhere.</p> <p>Remove the requirement for developers of Major Developments to provide 50% affordable housing. This would ensure that major developers - who have the biggest potential for supplying the new homes we desperately need - are not dis-incentivised from building in Wandsworth.</p>	<p>Remove the requirement for developers of Major Developments to provide 50% affordable housing. This would ensure that major developers - who have the biggest potential for supplying the new homes we desperately need - are not dis-incentivised from building in Wandsworth.</p>	<p>Comments noted.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p> <p>Having no affordable housing requirement in the Local Plan would not be sound or consistent with national policy. It would fail to provide any effective mechanism for the delivery of affordable housing, which is a type of housing that caters for many in the Borough who cannot afford market housing.</p>

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64	Kanwal Hameed	LP23					<p>Hi there,</p> <p>I'm a resident of [redacted] and express full support for the plan for insisting on 50% affordable housing in property developments. I'd also support avoiding developers seeking supernormal profits wherever possible- and of course, affordable housing also being safe and fit for purpose (thinking of Grenfell cladding malpractice here).</p> <p>I hope this proposal goes ahead and sets a model for other areas. Good luck!</p>		Support Noted.
65	Jack Schofield	LP23					<p>Hi there,</p> <p>I wanted to write to express my concerns at the proposed housing policy changes. Requiring 50% of new houses to be "affordable" Will not have the desired impact and will result in less houses being built overall.</p> <p>We wouldn't do this in any other market- and housing is a vitally important market with existing shortages. We should be reducing regulations around house building, not adding to them.</p>		<p>Comments noted.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p>
66	Archie Mason	LP23					<p>Morning!</p> <p>Just messaging as I saw you were asking for people's views</p> <p>TLDR I am against making the 50% mandatory - all it will do is slow development and make housing more expensive for the rest of us.</p> <p>Making a development 50% affordable doesn't reduce developer profits by 50% - it's a false equivalency.</p> <p>It removes the profit margin by much more (or eliminates it); which leaves them with no incentive to build.</p> <p>Way to think about it is if you have 10 houses that cost £1 and sell for £1.10 you have a 10% 10p profit per unit.</p> <p>If you make them affordable - your price could be 90p - so you remove the profit on that house and another non-affordable unit.</p> <p>Small/medium Developers developers will just say nah and be more selective in their developments - building less and leaving less and more expensive houses for the rest of us.</p> <p>Frankly your 50% affordable plan would only help those who have already bought housing who benefit from rising prices, and those lucky enough to get on your affordable list for the homes that do get built.</p>	Don't do 50%, do 10%.	<p>Comments Noted.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p> <p>Setting a lower threshold is not considered to be appropriate. This would lead to the delivery of less affordable housing overall, harming the ability for the Borough's significant need for affordable housing to be met, and mean that developments which could viably afford to contribute more would not be required to.</p>

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							Oh and it helps large building companies who have the legal resources to use the viability requirement to skirt your S106 requirements anyway! Don't do 50%, do 10%.		
67	Denis MacDaid	LP23					The policy states a requirement of any new development in Wandsworth to provide for 50% social/ affordable/ council housing. Whilst this is an admirable policy anyone with any brains knows this is undeliverable. It does not stack up financially. The 50% requirement has been around for years but has never been delivered in the Greater London Area. It is unfinanceable. Like many of the Labour Party's latest announcements on many policies, great ideas but no chance of deliverability. Pie in the sky. Such a waste of valuable time and effort by council staff.	Comments Noted. Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.	
68	William Byrne	LP23					Dear Wandsworth Council, I've seen your consultation online - i'd really like to fill it out and ensure my views are taken into account as a resident. Please may you advise how I do this? I can't see that there's an online form? My view is entirely opposed to your idea to have 50% mandatory affordable - why would any private enterprise build more homes with that constraint... we're in a housing crisis and you're determined to make it worse.	Comments Noted. Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.	
69	Tom Bailey [See also Row 150]	LP23					Hi I am a Labour party member and local resident. I wish to input my views on the proposed changes. Although I can see the intention of councillors is positive, I think these changes will undermine housing delivery and thereby make the problem worse. London is the most expensive city in the world to build, according to Arcadis. Requiring 50% affordable housing will make schemes less viable, reduce delivery and thereby exacerbate the housing crisis. It will be counterproductive and go beyond the affordable percentage required by the London plan for fast track. The only way to boost affordability is to increase supply. I attended a consultation for a scheme near me by Tooting Bec within the last year or so, and was told that, even before consultation, planning officers had told the developer to reduce the size of it. This is ridiculous. We are not getting any more land. We need to densify and build up if we are to boost supply and be able to deliver affordable units via private developers. 20-30% of a bigger number of homes will do much more than 50% of a considerably lower number. If the local plan should be changed, it should focus on supporting densification across	If the local plan should be changed, it should focus on supporting densification across Wandsworth. Comments Noted. Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper. Setting a lower threshold is not considered to be appropriate. This would lead to the delivery of less affordable housing overall, harming the ability for the Borough's significant need for affordable housing to be met, and mean that developments which could viably afford to contribute more would not be required to.	

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						Wandsworth. Please rethink these flawed proposals.			
70	Ryan Davison	LP23				<p>I am emailing to voice my opposition to the requirement for developers to deliver 50% affordable housing across new developments. As evidence from the USA shows (link below), where similar policies have been carried out, it has simply reduced total housing supply, including that of 'affordable housing', since builders decide it is no longer affordable to build.</p> <p>https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4578637</p> <p>This policy will there do nothing to increasing housing affordability in Wandsworth, and may even actively harm it. As a private renter, I know that the only policy that will make housing affordable for all is a mass increase in housebuilding of all kinds - this policy fails to do that: to paraphrase the Prime Minister, this policy is simply another blocker when we need more builders.</p>		<p>Comments Noted.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p>	
71	Jack Simpson	LP23				<p>50% Affordable is an awful idea, I want houses to be built, tax it, use that to improve services.</p> <p>Please think.</p>		<p>Comments Noted.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p>	

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72	Joe Summerell	LP23					<p>Dear Wandsworth Council.</p> <p>I am not a resident of Wandsworth but I am a first-time buyer in another, very expensive part of the country.</p> <p>If you would like more homes to be built, forcing housebuilders to ensure new developments contain "50% affordable homes" is only going to achieve the following:</p> <ul style="list-style-type: none"> - Not as many homes built - The "affordable homes" built will be of sub-optimal standard <p>Forcing housebuilders to provide "affordable housing" is an admirable, sensible-looking request on the surface but it never works, as it devastates builders' profit margins on developments.</p> <p>This means that even fewer sites become desirable for development, as fewer sites will offer a good opportunity to achieve a suitable ROI.</p> <p>Further to this, the homes within developments are usually finished to a more basic, sub-optimal level; as achieving profit on them relies on using cheaper plans, cheaper labour, cheaper materials and cheaper fittings.</p> <p>Businesses do not absorb hits on their profit margins, in order to pass on incentives promised by council policy. They have costs to pay and labour to employ.</p> <p>The only way to ease the housing crisis is to work with developers to find suitable sites and expedite planning applications. Expedite compulsory purchases and/or the demolition of derelict buildings, so that a site can be prepared for development.</p> <p>I have been saving for a house for nearly a decade and have seen new development after new development in my area (the south west) get more and more expensive, as sites were frequently encumbered with an expectation that a certain percentage would be "affordable".</p> <p>But what happens in reality? A tiny number of properties get listed as "affordable" with a queue a mile long. The other properties on the site then get a 15, 20, 25, 30% premium added to their price, to make up for the loss on the affordable homes. Sellers in nearby areas then see these new homes getting listed at outrageous prices and start following suit when listing their homes that were not even built within the new development! This tactic only ensures that prices rise and greater number of people fight over a smaller number of "affordable" homes. The only way out of this is more development. By both finding new sites and encouraging density where it is suitable.</p> <p>Many thanks for your time.</p>		<p>Comments Noted.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p> <p>Policies setting standards for new housing are set out in the adopted Wandsworth Local Plan (2023-2038) and are not proposed to change as part of the Local Plan Partial Review.</p>

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73	Simon Goldring	LP23					I've been a private renter in the Lewisham station area for two and a half years. I work next to Waterloo Station. I looked at a flat in the Wandsworth Town area last summer, and am interested in moving there in the future. The area has relatively good public transport access to my work, and would be better situated for my partner, who lives in Sutton. I am strongly against the proposed 50% affordable housing requirement, as it would hinder the delivery of market-rate housing, further driving up average rent. London is an outlier in having a very proportion of social housing, and that housing is commonly in what are now very desirable areas.		Comments Noted. Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.
74	Zac Evans	LP23					<p>Hello,</p> <p>This is an awful idea and will achieve the polar opposite of what you are trying to do.</p> <p>Whilst you may dislike developers making money, their goal is to generate profit. They are not in the market for satisfying local politicians whims. It is totally unreasonable to expect profit making enterprises to hobble themselves in order to hit your 'affordable' target. They will simply build elsewhere or not build at all. So rather than getting new developments they won't develop at all.</p> <p>As with your national party's policy on private education, ideology trumps results so I have no doubt you will plough on anyway regardless of whether residents agree or not.</p> <p>Whilst I do think a level of affordable housing is a good idea, 50% is ridiculous. To command any developer they have to sell half their units at below market rate is the perfect recipe for not getting any units.</p> <p>I can only imagine other London boroughs are rubbing their hands together at the thought of getting Wandsworth's developers to come and build in their borough.</p>		Comments Noted. Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.
75	Mark Swindells	LP23					<p>Dear sir or madam</p> <p>In response to your consultation about requiring developers to offer 50% 'affordable' units.</p> <p>I suggest you ask <any> economist for advice. If the objective is to maximise supply and lower prices and rents the policy should be to allow the lowest cost development with no subsidy requirement. That will be best for all.</p>	If the objective is to maximise supply and lower prices and rents the policy should be to allow the lowest cost development with no subsidy requirement. That will be best for all.	Comments Noted. Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper. Having no affordable housing requirement in the Local Plan would not be sound or consistent with national policy. It would fail to provide any effective mechanism for the delivery of affordable housing, which is a type of housing that caters for many in the Borough who cannot afford market housing.

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76	Matthew Marsh	LP23					<p>Hi,</p> <p>As a resident of the Latchmere Estate and Wandsworth council I would like to argue against the utterly insane and economically illiterate proposal of mandating 50% affordable housing levels.</p> <p>The first thing to acknowledge is that all of the available academic literature shows that mandates this high make housing MORE unaffordable. For example:</p> <p>https://ternercenter.berkeley.edu/wp-content/uploads/2024/04/Inclusionary-Zoning-Los-Angeles-April-2024.pdf</p> <p>You are, quite literally, choosing to cause more harm, more homelessness, more deprivation. It is utterly shameful.</p> <p>You are making owning a house the preserve of the super rich. An affordability mandate this high means that only the super wealthy will be able to buy a new home. Ordinary people should be able to buy a house in this borough.</p>		<p>Comments Noted.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p>
77	Paul McDonnell obo Battersea & Wandsworth Trades Union Council [See also Row 128]	LP23					<p>Policy LP23 The Battersea and Wandsworth Trades Union Council (BWTUC) is in agreement with this proposed change provided it is not applied retrospectively to sites where different percentages have already been agreed in principle and where retrospective application would result in a loss of affordable housing and employment (eg the remaining Battersea Power Station sites)</p> <p>Policy LP23 Small Sites BWTUC supports this with the obvious (but unstated) proviso that it would not apply to small developments by housing co-operatives.</p> <p>Policy LP23 A.2 The BWTUC agrees with this proposed change.</p> <p>Policy LP23 A.4 BWTUC would prefer to see rehabilitation prioritised over demolition where possible and is opposed to the loss of amenity space on existing estates.</p> <p>Policy LP23 C The BWTUC supports this change.</p> <p>Para 17.19 - The BWTUC is in agreement.</p>		<p>Comment Noted. The proposed policy would be applied to new permissions and certain re-submitted applications. The Council has recommended a potential modification to the supporting text for the Inspector's consideration. This modification would clarify what is meant by "resubmitted".</p> <p>The proposed Small Sites requirement would apply to all types of housing, subject to viability. Viability assessments associated with small sites will be proportionate and designed so as to avoid placing a financial or administrative burden on applicants that is disproportionate to the size of the scheme. This will be further set out in a planned Affordable Housing SPD.</p> <p>The Council has recommended a potential modification to the supporting text for the Inspector's consideration which clarifies that small sites delivering the net equivalent of 15% or more affordable housing on-site would not be required to make an additional financial contribution.</p>

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78	Avish Kumar	LP23					<p>Dear Council,</p> <p>I am writing in response to your request for comment per https://x.com/wandbc/status/1891095186589331854, which sought opinions by London residents on the Council's plans to require "developers to deliver 50% affordable housing across new developments". As a 21-year-old who has lived in London since I was born and seen the cost of housing skyrocket due to insufficient building, I would like to voice my strong disapproval of this policy proposal.</p> <p>Those trying to build housing in London have dealt with absurd amounts of regulation governing the amount of new development, and this is the main reason London has repeatedly fallen significantly short of the Mayor's target of 52000 new homes each year (London Plan). In fact, we fall over 30% short of this target every year. Hamstringing developers with yet more regulation cannot be the answer to our problems, especially with margins being so low. A housing developer forced to sell 50% of their stock at well below market rates will clearly not be able to turn a profit, and so building will simply be cancelled. While the proportion of affordable housing may go up, the actual quantity goes down, and the latter figure is what actually matters to people like me who want to move out of our parents' homes into new houses.</p> <p>London's population growth outstrips the amount of new housing stock added, and this means prices continuously rise unchecked. The only cities around the world which have successfully caused house prices to fall have done so by actually allowing houses to be built, such as Austin, Texas. We are not going to legislate our way into housing being built: developers will not operate at a loss, they will simply quit building! A proposal designed to make building new housing less profitable is certainly no friend of people trying to enter the housing market, and for that reason I urge you to strongly reconsider this "feel-good" policy which exacerbates one of the biggest crises facing not only the borough, but the entire city.</p>		<p>Comments Noted.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p>
79	Oliver Fernandes	LP23					<p>Good afternoon,</p> <p>Please do not mandate for a higher percentage of "affordable" housing in new developments. This means that fewer houses in total will be built, resulting in overall house prices for everyone else.</p> <p>While the policy might be great for the absolute poorest in the area, it's the young working age population who once again are being squeezed and are having to foot the bill despite barely being able to afford to live in London, but get no support whatsoever.</p> <p>PLEAAE reconsider this proposal.</p>		<p>Comments Noted.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p>
80	Ronald Graham	LP23					<p>I am a resident of Wandsworth and have been for 20 years.</p> <p>We desperately need more housing but having spoken to many developers it is clear that a 50% level of social housing is uneconomic and will stop developments that could</p>	<p>A 20% level is a much more realistic limit. I urge us to keep to 20% not 50%.</p>	<p>Comments Noted.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a</p>

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							<p>otherwise happen.</p> <p>A 20% level is a much more realistic limit. I urge us to keep to 20% not 50%. We must build more housing private and social - but please stick to a balance that will deliver this. A 50% level of social housing will not.</p>		<p>Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p> <p>Setting a lower threshold is not considered to be appropriate. This would lead to the delivery of less affordable housing overall, harming the ability for the Borough's significant need for affordable housing to be met, and mean that developments which could viably afford to contribute more would not be required to.</p>
81	Michael Williams	LP23					<p>The 50% affordable housing dogma is more an ideological blockage to progress than a realistic aspiration.</p> <p>It is a huge deterrent to developers at a time when new builds are desperately needed and planning processes are already hopelessly sclerotic.</p> <p>A 20 or 25% requirement would yield a much-improved level of response from developers. At the 50% level, the aspiration for new investment will remain an aspiration, not an attainable objective.</p>	<p>A 20 or 25% requirement would yield a much-improved level of response from developers. At the 50% level, the aspiration for new investment will remain an aspiration, not an attainable objective.</p>	<p>Comments Noted.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p> <p>Setting a lower threshold is not considered to be appropriate. This would lead to the delivery of less affordable housing overall, harming the ability for the Borough's significant need for affordable housing to be met, and mean that developments which could viably afford to contribute more would not be required to.</p>
82	James Callen	LP23					<p>Just seen the advert for this online. I really don't think it's been thought through. This is essentially a 50% tax on all new developments for private building companies.</p> <p>If the idea is to stop developments in the borough then this will work as companies will take their business elsewhere.</p> <p>Let's make it more attractive to building companies to develop areas of the borough and house prices and affordable rentals will improve for everyone.</p>		<p>Comments Noted.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p>
83	Caroline Osborne	LP23					<p>I have read through the planning information and I fully support the council's plans to require developers to build a higher percentage of social housing.</p> <p>With so many homeless families and 13,000 families on the waiting list, housing needs to be genuinely affordable and linked to the London Living Rent.</p> <p>Given the recent history of property development in the borough it is especially important that developers increase the percentage of affordable housing.</p> <p>The composition of the population of Wandsworth would suggest an increase in the</p>		<p>Support Noted.</p>

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						<p>number of 1 and 2 bedded houses, and multiple occupancy housing with shared facilities, is a sensible initiative too.</p> <p>Most importantly I am pleased that the percentage of new affordable homes that are socially rented has been increased.</p> <p>(Now we just have to persuade the government to stop selling off council properties).</p> <p>Thank you for all the hard work involved, especially for young renters in the borough.</p>			
84	Laura Giuliani	LP23				<p>I couldn't get my head around the consultation form! The 50% affordable housing requirement is likely to put developers off. I would like to see it removed, it's extremely likely to stop development. I can see the attraction to it, but we must be pragmatic to start meeting the housing needs of Londoners!</p> <p>I believe developers should pay cash to the council in lieu of building affordable housing themselves. The council could then use this money to construct and maintain their own social housing. The flexibility is likely to mean more housing is built - it would mean development was more profitable, so more money was available for affordable housing. And the housing could be built anywhere in the area, potentially meaning more units could be built for the same costs.</p>	<p>The 50% affordable housing requirement is likely to put developers off. I would like to see it removed, it's extremely likely to stop development</p> <p>I believe developers should pay cash to the council in lieu of building affordable housing themselves. The council could then use this money to construct and maintain their own social housing</p>	<p>Comments Noted.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p> <p>Requiring developers to pay cash in lieu of building affordable housing themselves as the default route to delivering affordable housing would be inconsistent with national policy and risks leading to less inclusive communities.</p>	
85	William Richardson	LP23				<p>Requiring developers to deliver 50% affordable housing across new developments will reduce housing supply vs realistic counterfactuals.</p> <p>Much better to allow the developments, see supply grow than attempt 'pre-distribution' and have nothing built.</p> <p>London population is growing rapidly and it's population are best served by councils that allow housing and infrastructure to grow with it rather than restrict it.</p> <p>Government for the builders, not the blockers!</p>		<p>Comments Noted.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p>	
86	Valerie Mowah obo Merton Council	LP23				<p>Merton supports Wandsworth's proposed objective to strengthen the Local Plan policy requirement for new housing development in the borough as it is considered that this will help more effectively contribute towards addressing Wandsworth's identified local needs and the London Plan strategic target for 50% of all homes delivered across London to be genuinely affordable.</p> <p>Merton supports:</p> <ol style="list-style-type: none"> 1) Proposed fast track threshold requirements set out in Strategic Policy LP23 Affordable Housing. 2) Proposed changes to policies LP24 Housing Mix; LP28 Purpose-Built Student Accommodation; LP29 Housing with Shared Facilities; LP30 Build to Rent and LP31 Specialist Housing for Vulnerable People and for Older People. 		<p>Support Noted.</p>	

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							The proposed changes to these policies are supported by an evidence base, the robustness of which will be tested via the Local Plan Examination.		
87	Ian Reid	LP23					I believe 50% affordable sounds good but is too hard a requirement, is likely to be counterproductive and result in less new housing rather than more as developers struggle for profitability and an easier target should be set. Quality of housing and fittings may be impacted by this target in order to lower costs.	Comments Noted. Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper. Policies setting standards for new housing are set out in the adopted Wandsworth Local Plan (2023-2038) and are not proposed to change as part of the Local Plan Partial Review.	
88	Sarah Chapman obo Wandsworth Foodbank	LP23	Y	Y	Y		As a local borough-wide charity supporting people in hardship and on the very lowest incomes - many of who experience insecure housing, difficulties of private renting on a low income (and accessing private tenancies using Universal Credit), or are in temporary accommodation - we very much welcome Wandsworth Council's strategic policy to proactively increase the amount of social housing available for local people in most need. Having a safe, secure, affordable and decent home is essential in enabling families and individuals in need to put down roots, sustain employment, access education, be able to afford basic essentials like food, plan for the future and to flourish. Our community needs to enable people on the lowest incomes, many of whom working incredibly hard as unpaid carers or in lower-paid but essential work, to live and thrive locally. This is for the benefit of us all.	Support Noted.	
89	Mt Richard Paul Griffiths	LP23	N	N	N	Positively prepared, Justified, Effective, Consistent with national policy	We need social housing NOT affordable housing. That is the crucial difference. Social housing	We need social housing not affordable	Comment Noted. The Council's proposed policies clearly prioritise social housing as the priority tenure of affordable housing to be delivered. Other forms of affordable housing are allowed for in the Council's proposed policies, consistent with the London Plan and national policy.
90	Ms Zlatka Jackin	LP23	Y	Y	Y		2. For 1-9 dwellings developments there should be a minimum 25% of sold and advertised at value combined for all dwellings. Publicly owned buildings should not be offered to private developers and used to meet 100% public needs including converting those to social housing dwellings.		Comment Noted. These issues are outside the scope of planning policies.

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91	Ms Sarah Kearney	LP23	Y	Y	Y		If I have understood correctly the local building plan will mean more council housing being built. This can only be a good thing	Support Noted.	
92	Ms Rhiannon Hughes obo South West Law Centres	LP23				Effective	With over 13,513 households on the housing waiting list including 3000 homeless households in overcrowded accommodation I would like to query what is meant by the term 'habitable' rooms. Will these be rooms that include large kitchens where a bed could be placed or the expectation that a living space could be converted into a 'habitable' bedroom? Families are forced into overcrowding because of terms like 'habitable' and the expectation that large kitchens and living spaces should be used for beds and that families renting social rented homes can do without any living or developmental space. We would like clarity on the formula that is being used to calculate 'habitable' rooms and whether that will be used to determine household size. Why was the term 'habitable' perceived as a more useful approach than determining social rented building targets on bedroom need assessed against the needs of the housing waiting list. We would like clarity on the term 'habitable' and why this wording is being used.	We would like clarity on the term 'habitable' and why this wording is being used.	Comment Noted. The term 'Habitable rooms' refers to types of rooms within a home that are used or intended to be used for sleeping, cooking, living or eating purposes. This definition is derived from the London Plan. Habitable rooms does not refer to the quality of the room for the purposes of habitation. The Council's policy refers to affordable housing as a proportion of habitable rooms which is an accepted method for measuring the proportion of affordable housing across a development. This approach accords with the London Plan.
93	Ms Janine Streuli [See also Row 130 and 145]	LP23	Y	Y	Y		I fully support the increase to 50% affordable housing being necessary for all new developments. For very small sites, there should be a stronger commitment by the council to sell land for self-build projects for local people at an affordable price.	For very small sites, there should be a stronger commitment by the council to sell land for self-build projects for local people at an affordable price.	Support Noted. The disposal of Council land is not directly within the scope of planning policies.
94	Mrs Halima Mahmoud	LP23	N	N	N	Justified, Effective, Consistent with national policy	Nonesens, let us build proper housing		Comment Noted.
95	Mr. Duarte Martins	LP23	N	N	N	Positively prepared; justified; effective; consistent with national policy	<p>I do not consider the policy wording to be sound as currently drafted. The proposed 50% affordable housing target is not positively prepared, not justified, not effective, and not consistent with national policy.</p> <p>2. Reasons for Unsoundness</p> <p>A. Economic Viability Concerns The policy mandates that 50% of all habitable rooms in major developments must be affordable housing, with a significant portion allocated to social rent. This requirement is economically unviable and is likely to result in no new housing being built at all. High Affordable Housing Targets Reduce Housing Supply Evidence from other London boroughs, such as Islington, shows that high affordable housing targets deter development rather than increase affordable housing provision. When a 50% affordable housing target was introduced, housing supply declined, leading to a net reduction in total new housing. Cambridge had a similar experience with a 40% affordable housing target, which led to a slowdown in development, forcing the council to revise the target downwards to ensure continued housing delivery. Impact on Land Supply Developers and landowners price land based on potential revenue. If land values cannot sustain development under a 50% affordable housing mandate, landowners will not sell, and development will not occur. This will artificially constrain housing supply,</p>	3. Recommended Modifications To make the policy legally compliant and sound, the following modifications are necessary: Remove the affordable housing target entirely (0%) and focus on meeting housing needs via alternative mechanisms, such as direct public investment in social housing and housing benefit support. Evidence from Shelter and the Centre for Cities indicates that direct public investment in social housing is more effective at meeting housing needs than rigid affordability quotas that deter development. Encourage private sector development without restrictive quotas, allowing for increased housing supply that naturally reduces market pressures. The Adam Smith Institute has published reports demonstrating how excessive affordability mandates reduce total housing production. Introduce demand-side mechanisms such as subsidies or rental	<p>Comment Noted.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The Housing Needs Assessment identifies an extremely high need for affordable housing across the plan period, up to 23,600 affordable homes, a majority of which are needed for social rented housing. As set out in the Housing Background Paper, there are strong social and economic imperatives to plan to meet this need.</p> <p>The Council has specifically designed the policy to ensure it is effective and deliverable, as demonstrated through the evidence base. In particular, the Whole Plan Viability Assessment demonstrates that a significant number of development typologies would be viable at a 45% threshold, which is the threshold required under the Council's Fast Track Route. As set out in the Housing Background Paper, there is a strong correlation between the most viable typologies and the</p>

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						<p>worsening affordability in the borough. Disincentivising Private Sector Investment The policy assumes that private developers can subsidise half of all new housing, which misaligns with real estate financial models. Developers require a minimum of 15-20% profit margins for a project to be viable. If market-rate housing cross-subsidises an excessive affordable housing quota, projects become financially unviable. The result will be a withdrawal of investment, leading to stagnation in housing development.</p> <p>B. Adverse Impact on Small Developers LP23 imposes a £50,000 per unit levy on small developments (1-9 units). Small developers often operate on higher margins due to increased financial risk. This levy makes smaller projects financially non-viable, driving small developers out of the borough and further reducing overall housing supply. C. Misalignment with National Planning Policy Framework (NPPF) The NPPF (2021) requires Local Plans to be deliverable and viable. However: No clear financial mechanisms are in place to ensure the 50% target is deliverable. The policy assumes developers will fill the financial gap without evidence that this is possible. This contradicts NPPF guidance, which states that policies should not threaten the viability of development as a whole. 3. Recommended Modifications To make the policy legally compliant and sound, the following modifications are necessary: Remove the affordable housing target entirely (0%) and focus on meeting housing needs via alternative mechanisms, such as direct public investment in social housing and housing benefit support. Evidence from Shelter and the Centre for Cities indicates that direct public investment in social housing is more effective at meeting housing needs than rigid affordability quotas that deter development. Encourage private sector development without restrictive quotas, allowing for increased housing supply that naturally reduces market pressures. The Adam Smith Institute has published reports demonstrating how excessive affordability mandates reduce total housing production. Introduce demand-side mechanisms such as subsidies or rental support to assist those in need without deterring development. Research from the Institute for Fiscal Studies (IFS) suggests that housing affordability can be better addressed through targeted subsidies rather than supply-side restrictions. Remove the £50,000 per unit levy for small developers, which discourages small-scale development and limits housing supply. Evidence from the Federation of Small Businesses indicates that over-burdensome levies drive small firms out of local development markets. Align the policy with the NPPF by ensuring that affordability strategies do not render development unviable. The Royal Town Planning Institute (RTPI) has warned that local policies which do not properly assess economic viability at the plan-making stage lead to under-delivery of housing.</p>	<p>support to assist those in need without deterring development. Research from the Institute for Fiscal Studies (IFS) suggests that housing affordability can be better addressed through targeted subsidies rather than supply-side restrictions. Remove the £50,000 per unit levy for small developers, which discourages small-scale development and limits housing supply. Evidence from the Federation of Small Businesses indicates that over-burdensome levies drive small firms out of local development markets. Align the policy with the NPPF by ensuring that affordability strategies do not render development unviable. The Royal Town Planning Institute (RTPI) has warned that local policies which do not properly assess economic viability at the plan-making stage lead to under-delivery of housing.</p>	<p>types of sites expected to contribute to the Borough's long-term housing supply, such that there can be overall confidence in the policy being deliverable for a significant proportion of developments. The policy also retains a Viability Tested Route which means that developments which cannot maintain viability whilst meeting the requirements of the policy can still receive planning permission. The Council also considers it important that deliverability is evaluated across a plan period and as such that it is important to avoid giving disproportionate weight to short-term market conditions when there is a fair and evidenced expectation that market conditions will improve across the plan period. For these reasons, the Council considers there to be no likelihood of the proposed policy having a materially negative impact on local housing supply or deliverability and considers the policy to provide an effective and proportionate mechanism for addressing developments which cannot meet its requirements in full. There are a number of examples of recent developments achieving or offering affordable housing percentages in excess of the existing 35% threshold which demonstrate a higher threshold can be achieved. Further analysis of the matters summarised above, and the overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p> <p>Requiring an affordable housing contribution from small sites is considered to be justified on the basis of the high local need for affordable housing. The construction of the policy is similar to a large number of other London-based Local Plans which have also been justified on the basis of high local need. There is clear precedent across London that high local need may justify an approach which does not accord with national policy relating to small site affordable housing contributions.</p> <p>The value of the proposed small site contribution has been calculated using a recommended formula derived from the Whole Plan Viability Assessment to ensure it is viable for a majority of small sites. The derivation of the value, and the components of this formula, is set out clearly in the Housing Background Paper.</p> <p>It is the Council's intention to apply any small sites viability assessment process proportionately, in light of the need to avoid delays or administration that is disproportionate to the size of site or wider costs of delivering the site. In taking a simple, evidence-based approach to establishing the value of the small site contribution, and applying a proportionate viability assessment process for those sites which cannot viably provide that contribution, the Council does not consider</p>	

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								that there will be a material impact on small sites' delivery in the Borough. Further information on the application of the small sites viability assessment process would be set out in a planned Affordable Housing SPD.	
96	Mr William Byrne	LP23	N				My view is entirely opposed to your idea to have 50% mandatory affordable - why would any private enterprise build more homes with that constraint... we're in a housing crisis and you're determined to make it worse.	Comments Noted. Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.	
97	Mr Tom Kearney	LP23 - General Support	Y	Y	Y		If I have understood correctly the local building plan proposals would mean more council housing being built. This can only be a good thing	Support Noted.	
98	Mr Samuel Nodet Owers [See also Row 132, 164 and 182]	LP23	Y	N	Y	Consistent with national policy	Requiring 50% affordable housing from house builders is an effective tax on new homes which will reduce the incentives to build new housing which is what we desperately need as a country. I completely reject the wording and the policy as a whole.	Requiring 50% affordable housing from house builders is an effective tax on new homes which will reduce the incentives to build new housing which is what we desperately need as a country. I completely reject the wording and the policy as a whole. Comments Noted. Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.	
99	Mr Ross Cameron	LP23	N	N	N	Justified, Effective	This policy will undoubtedly impact the financial viability of any future residential developments in Wandsworth. Any new development will be significantly (negatively) impacted by the policy. Why would any developer wish to develop in Wandsworth in the	Comments Noted.	

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							knowledge that the financial value of any private units within any such development would be adversely impacted by the possible inclusion of 50% social housing and the negative impact of such on the overall financial viability of the development. Moreover, who in their right mind would wish to buy into the private element of any such development in the knowledge that 50% of the development could be social housing.		Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.
100	Mr Richard Arko-Adjei [See also Row 133, 165 and 183]	LP23	N	N	N	Positively prepared, Justified, Effective, Consistent with national policy	In accordance with the National Planning Policy Framework, local authorities should refrain from imposing affordable housing contribution requirements on small-scale developments. The financial viability of such projects is inherently precarious, given the high rates of financing required e.g. 12-14%, and the unwarranted imposition of these costs, unrelated to the development itself, further jeopardizes their feasibility. Should a council wish to increase its affordable housing stock, can it not pursue funding options of their own, such as borrowing, similar to larger developers, and undertake projects based on sound economic principles. Furthermore, recent instances of major developers, such as Barratt's, withdrawing from projects due to financial viability concerns arising from affordable housing contribution criteria underscore the critical need for a balanced and realistic approach. NPPF (2018, paragraph 63): Affordable housing should not be sought on residential schemes that are not major developments. Paragraph 63 of the 2018 NPP confirms the Affordable Housing threshold as 10 or less dwellings or a combined floor space of 1,000sqm. This policy is likely to deter small site developers and undermine their ability to attract funding. You should not impose any affordable housing contribution on small sites as per the national guidance: NPPF 2018 paragraph 63; NPPF 2024 paragraph 65.	You should not impose any affordable housing contribution on small sites as per the national guidance: NPPF 2018 paragraph 63; NPPF 2024 paragraph 65.	Comment Noted. Requiring an affordable housing contribution from small sites is considered to be justified on the basis of the high local need for affordable housing. The construction of the policy is similar to a large number of other London-based Local Plans which have also been justified on the basis of high local need. There is clear precedent across London that high local need may justify an approach which does not accord with national policy relating to small site affordable housing contributions. The value of the proposed small site contribution has been calculated using a recommended formula derived from the Whole Plan Viability Assessment to ensure it would be viable for a majority of small sites. The derivation of the value, and the components of this formula, is set out clearly in the Housing Background Paper. It is the Council's intention to apply any small sites viability assessment process proportionately, in light of the need to avoid delays or administration that is disproportionate to the size of site or wider costs of delivering the site. In taking a simple, evidence-based approach to establishing the value of the small site contribution, and applying a proportionate viability assessment process for those sites which cannot viably provide that contribution, the Council does not consider that there will be a material impact on small sites' delivery in the Borough. Further information on the application of the small sites viability assessment process would be set out in a planned Affordable Housing SPD.
101	Mr Peter Carpenter [See also Row 134, 152, 184 and 203]	LP23	Y	N	Y	Justified, Effective	The requirement for 50% affordable housing will simply restrict the number of developments coming forward as few developments will be economically viable with a 50% affordable component (especially given the high proportion of social housing required). The result would be to reduce rather than increase the number of affordable housing units provided. In order to make such developments viable there would have to be a change in the land valuations used, changing these is a matter for National, not Local government. I would reduce the proportion of affordable housing to 35% and reduce the % of social housing within that.	I would reduce the proportion of affordable housing to 35% and reduce the % of social housing within that.	Comments Noted. Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.
102	Mr Jamie Colclough @ Imabi Ltd	LP23	Y	Y	Y		2. It's really important to me that Wandsworth gets more affordable housing and I believe this policy will achieve that.		Support Noted.

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103	Mr Cristian Nedelea	LP23	Y	N	N	Effective	Forcing developers to sell half (!!) the homes they build at a huge discount will kill many of the viable projects. Nobody will take on such risks in the future at least nothing nice or of quality. This is NOT free market capitalism, once you force such discounts, it's the beginning of the end. The Government should step in and rewrite your plan.	The Government should step in and rewrite your plan.	Comments Noted. Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.
104	Mr Charles Glover-Short obo Southern Housing [See also Row 135, 166, 185, 194 and 201]	LP23	Y	Y	Y		<p>We support the main aims and principle of this policy and make the following comments: -</p> <p>Support for Social Rent Priority - Southern Housing welcomes the 70% social rent requirement, aligning with the need for genuinely affordable homes. However, ensuring financial viability for mixed-tenure developments remains a challenge -</p> <p>On-Site Delivery & RP Engagement - the on-site provision requirement is positive but may create challenges in securing Registered Providers (RPs) for certain schemes, managing service charges, and ensuring feasibility. Clearer expectations on early (i.e. design stage) RP engagement would be beneficial -</p> <p>Viability & Financial Contributions - the Â£50,000 per unit contribution for small sites may not reflect site-specific viability. While the Fast Track Route is useful, achieving 45-50% affordable provision could be difficult for some developments -</p> <p>Off-Site Provision & Payment in Lieu - the strict approach to off-site delivery limits flexibility, even where it could increase social rent supply. Payment in lieu calculations should account for market fluctuations -</p> <p>Vacant Building Credit (VBC) & Public Subsidy - a rigid stance against VBC could discourage brownfield regeneration. Clarity on how the Council will facilitate access to funding would support RPs. -</p> <p>Design & Estate Regeneration - we support tenure-blind design and net increases in social housing for estate regeneration. However, clear funding mechanisms are needed for successful implementation.</p>		<p>Support Noted.</p> <p>The Council has recommended a potential modification to be considered by the Inspector which would add content to the supporting text of Policy LP23 to further clarify how the requirement for evidence of meaningful discussions with Registered Providers would be interpreted. The Council understands that securing a Registered Provider is a fundamental part of affordable housing delivery in most cases and that Registered Providers are more likely to bid for affordable housing if they are engaged early. The Council considers this requirement to therefore be good and appropriate practice.</p> <p>Requiring an affordable housing contribution from small sites is considered to be justified on the basis of the high local need for affordable housing. The construction of the policy is similar to a large number of other London-based Local Plans which have also been justified on the basis of high local need.</p> <p>The value of the proposed small site contribution has been calculated using a recommended formula derived from the Whole Plan Viability Assessment to ensure it is set at a value that is viable for the majority of small sites. The derivation of the value, and the components of this formula, is set out clearly in the Housing Background Paper.</p> <p>It is the Council's intention to apply any small sites viability assessment process proportionately, in light of the need to avoid delays or administration that is disproportionate to the size of site or wider costs of delivering the site. In taking a simple, evidence-based approach to establishing the value of the small site contribution, and applying a proportionate viability assessment process for those sites which cannot viably provide that contribution, the Council does not consider that there will be a material impact on small sites' delivery in the Borough.</p> <p>Further information on the application of the small sites viability assessment</p>

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								<p>process would be set out in a planned Affordable Housing SPD.</p> <p>Overall, Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p> <p>The Council's preferred approach is for affordable housing to be delivered on-site, with off-site delivery and payments in lieu requiring justification. This approach is consistent with national policy and the London Plan. Where an exceptional case to come forward where off-site provision could result in the delivery of materially more affordable homes, it would be possible for this to be considered a material consideration without the need to specifically acknowledge this in the policy.</p> <p>Vacant Building Credit offers an incentive to building on previously developed land. Developable land in Wandsworth is almost exclusively previously developed. There is therefore no need for an incentive to encourage previously developed land to be delivered and the inclusion of Vacant Building Credit would lead to an unjustified reduction in affordable housing delivery which is harmful to the need to maximise affordable housing delivery in the Borough.</p> <p>The Council's approach is consistent with that taken in its adopted Local Plan, which found the disapplication of Vacant Building Credit to be justified and sound.</p> <p>The Council has recommended a potential modification to the supporting text for the Inspector to consider which would better define how applicants are expected to demonstrate use of public subsidy. The availability of public subsidy is largely separate to the planning process, however the Council can offer routine support and signposting for potential public subsidy that is available.</p>	
105	Mr Ayomide Bamidele	LP23	Y	N	Y	Positively prepared, Justified, Effective, Consistent with national policy	<p>4. I appreciate that the council wishes to focus on affordable housing in Wandsworth borough. However, does the council have any evidence that increasing the affordable housing requirements on developments will lead to more housing affordability in the borough? We are in a post covid world where building costs have risen dramatically financing has a much higher interest payment cost. Has it been considered that this new 50% requirement could actually _reduce_ the amount of housing supply in the borough? More than 80% of current affordable housing starts are stalled currently due to the projects being now unviable [1]. I am struggling to see how increasing the affordability requirement is sound and will lead to increase housing affordability in Wandsworth when the reality of construction is the way it is currently. Has the council considered any evidence that analyses the effect of inclusionary zoning (i.e. affordability requirements) in London? One study [2] found that since 2008, the affordability requirements on boroughs in London have</p>	<p>To make this plan sound - it needs to have policies that increase the supply of housing in the borough. Increasing the supply of housing will not only make private rents more affordable, but will also reduce temporary accommodation costs and free up council funds to build more social housing. For housing delivery and sustainability the document should set out to increase the density of housing in the borough - we can look to Croydon's SPD (Supplementary Planning Documents) published in 2018. It streamlined the planning process to convert</p>	<p>Comment Noted.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The Housing Needs Assessment identifies an extremely high need for affordable housing across the plan period, up to 23,600 affordable homes, a majority of which are needed for social rented housing. As set out in the Housing</p>

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						<p>only led to *2* additional affordable homes, per year in London. It also found a reduction in construction of developments affected by affordability requirements. Is this really the best way to improve the affordability of housing in the borough? Does the council have any additional evidence to support this? The average and median rent of the borough has only been increasing, the median rent for a 2 bedroom flat in Wandsworth is £2150 [3]. Has the council considered evidence from other similar countries with affordability requirements and their effect on housing supply, rents and affordable housing? High affordability requirements often mean that developers have to raise the price of units that aren't included to afford to build the subsidised units which are not available to everyone on the market [4]. This could lead to an _increase_ in prices for new homes on the housing market in Wandsworth and make overall affordability worse for everyone (including the council, which pays private rents for temporary accommodation) - has this outcome been considered? Overall, I urge the council to consider what the actual _effects_ of these affordability requirements will be as there is little to no evidence that housing affordability will improve after this local plan change, and in fact a lot of evidence that it will get worse as less housing is built and housing demand increases. As a young person in the private rental market, who is spending more than 50% of my income on rent, it honestly quite distressing to see that the council is going in a direction that from all the evidence will do nothing to improve overall affordability in the borough and will likely make it worse. [1] https://www.bbc.co.uk/news/articles/c39nedd49nzo [2] https://www.planning.org/blog/9229188/examining-the-impact-of-londons-mandatory-inclusionary-housing/ [3] https://www.london.gov.uk/programmes-strategies/housing-and-land/improving-private-rented-sector/london-rents-map [4] https://www.mercatus.org/research/policy-briefs/inclusionary-zoning-hurts-more-it-helps</p> <p>5. To make this plan sound - it needs to have policies that increase the supply of housing in the borough. Increasing the supply of housing will not only make private rents more affordable, but will also reduce temporary accommodation costs and free up council funds to build more social housing. For housing delivery and sustainability the document should set out to increase the density of housing in the borough - we can look to Croydon's SPD (Supplementary Planning Documents) published in 2018. It streamlined the planning process to convert large homes into multiple units and in the following years lead to dramatic increases in housing affordability [1] compared to the rest of London. Has the council considered instead of increasing affordability requirements, making it easier and cheaper for housing conversions to happen in the borough to allow for denser, more sustainable and affordable living? Building on that, has the council considered the wealth of evidence internationally on the effects of policy that easily allow "upzoning" on housing affordability? For example, Auckland, the largest city in New Zealand, released a new local plan in 2016 that changed the 'zoning' for large parts of the city. In practice, this meant that most of the land that was previously designated as 'Single House Zone' was redesignated as either a 'Mixed Use Suburban Zone', a 'Mixed Use Urban Zone' or as a 'Terraced Housing and Apartments Zone'. This streamlined planning permission for developments near public transport and did not include any affordability requirements for mid density developments or redevelopments. As a result, housing became more affordable in Auckland. Average rents after inflation in Auckland fell by 2 per cent from</p>	<p>large homes into multiple units and in the following years lead to dramatic increases in housing affordability [1] compared to the rest of London. Has the council considered instead of increasing affordability requirements, making it easier and cheaper for housing conversions to happen in the borough to allow for denser, more sustainable and affordable living? Building on that, has the council considered the wealth of evidence internationally on the effects of policy that easily allow "upzoning" on housing affordability? For example, Auckland, the largest city in New Zealand, released a new local plan in 2016 that changed the 'zoning' for large parts of the city. In practice, this meant that most of the land that was previously designated as 'Single House Zone' was redesignated as either a 'Mixed Use Suburban Zone', a 'Mixed Use Urban Zone' or as a 'Terraced Housing and Apartments Zone'. This streamlined planning permission for developments near public transport and did not include any affordability requirements for mid density developments or redevelopments. As a result, housing became more affordable in Auckland. Average rents after inflation in Auckland fell by 2 per cent from</p>	<p>Background Paper, there are strong social and economic imperatives to plan to meet this need.</p> <p>The Council has specifically designed the policy to ensure it is effective and deliverable, as demonstrated through the evidence base. In particular, the Whole Plan Viability Assessment demonstrates that a significant number of development typologies would be viable at a 45% threshold, which is the threshold required under the Council's Fast Track Route. As set out in the Housing Background Paper, there is a strong correlation between the most viable typologies and the types of sites expected to contribute to the Borough's long-term housing supply, such that there can be overall confidence in the policy being deliverable for a significant proportion of developments. The policy also retains a Viability Tested Route which means that developments which cannot maintain viability whilst meeting the requirements of the policy can still receive planning permission. The Council also considers it important that deliverability is evaluated across a plan period and as such that it is important to avoid giving disproportionate weight to short-term market conditions when there is a fair and evidenced expectation that market conditions will improve across the plan period. For these reasons, the Council considers there to be no likelihood of the proposed policy having a materially negative impact on local housing supply or deliverability and considers the policy to provide an effective and proportionate mechanism for addressing developments which cannot meet its requirements in full. There are a number of examples of recent developments achieving or offering affordable housing percentages in excess of the existing 35% threshold which demonstrate a higher threshold can be achieved. Further analysis of the matters summarised above, and the overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p>	

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						<p>2016 to 2021, and, for those on low incomes, they fell by 6 per cent. In contrast, rents in the rest of New Zealand rose, with Wellington overtaking Auckland as the most expensive city in New Zealand. Likewise, house prices rose by 70 per cent in the rest of New Zealand over the same time period, but rose by only 20 per cent in Auckland [2]. Another area in New Zealand which introduced similar "upzoning" policies to increase housing supply and housing affordability lead to a 21% reduction in rent prices [3]. There is also a lot of evidence on how allowing market rate housing makes housing affordable for low and middle income residents by creating "moving chains" where residents move into "luxury" or "market rate" flats and move out of their previous residences which make them cheaper for residents lower down on the income scale [4]. In light of this real world evidence, could the council consider streamlining the planning process and lowering affordability requirements drastically for medium density size and small developments? This would make development much more viable and lead to an overall higher supply of housing in Wandsworth and would make housing in the borough more affordable. If the council does not want to consider lowering affordability requirements could evidence be provided that housing affordability in the borrow will actually increase after these requirements are put into place? I hope the council can consider the immense scale of the housing crisis that we are experiencing. And for someone already paying an extortionate amount on rent in the borough it might seem strange that I am asking for affordability requirements to be reduced. I am doing this because all the evidence we have available shows that affordability requirements have not significantly increased affordability of housing in London at all - and I think raising the requirements in despite any clear evidence will only risk reducing the supply of housing in the borough and make the housing crisis _worse_. [1] https://www.ft.com/content/de34dfc7-c506-4a81-b63d-41d994efaa89 (graph attached) [2] https://www.centreforcities.org/blog/new-zealand-shows-how-planning-reform-will-end-britains-housing-crisis/ [3] https://www.sciencedirect.com/science/article/pii/S1051137724000512 [4] https://www.sciencedirect.com/science/article/pii/S0094119022001048 6. Yes</p>	<p>down on the income scale [4]. In light of this real world evidence, could the council consider streamlining the planning process and lowering affordability requirements drastically for medium density size and small developments? This would make development much more viable and lead to an overall higher supply of housing in Wandsworth and would make housing in the borough more affordable. If the council does not want to consider lowering affordability requirements could evidence be provided that housing affordability in the borrow will actually increase after these requirements are put into place? I hope the council can consider the immense scale of the housing crisis that we are experiencing. And for someone already paying an extortionate amount on rent in the borough it might seem strange that I am asking for affordability requirements to be reduced. I am doing this because all the evidence we have available shows that affordability requirements have not significantly increased affordability of housing in London at all - and I think raising the requirements in despite any clear evidence will only risk reducing the supply of housing in the borough and make the housing crisis _worse_. [1] https://www.ft.com/content/de34dfc7-c506-4a81-b63d-41d994efaa89 (graph attached) [2] https://www.centreforcities.org/blog/new-zealand-shows-how-planning-reform-will-end-britains-housing-crisis/ [3] https://www.sciencedirect.com/science/article/pii/S1051137724000512 [4] https://www.sciencedirect.com/science/article/pii/S0094119022001048</p>		

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106	Mr Angus Robertson	LP23	Y	N	Y	Justified	<p>2. I fully support the overall aim of the proposed policy LP23 in that it seeks to maximise the delivery of affordable housing with the strategic target of all new homes to be affordable (and within that 70% to be social rent).</p> <p>4. I do not feel that the wording of section A.4 is sound. I feel that it is not 'Justified' because it does not set out an appropriate strategy to achieve the overall aim of policy LP23 i.e. to maximise the delivery of affordable housing. The wording of section A.4 sets an expectation for development proposals and estate regenerations, where there is a loss of existing affordable housing, to 'deliver a net uplift in the number of socially rented homes'. However this net uplift could be negligible (it could be one single dwelling/room) and therefore this requirement would not provide an effective way to meet the aim of the policy (to maximise the delivery of affordable housing). 5. The wording of this section A.4 should be strengthened to ensure that the requirement, where there is a loss of existing affordable housing, for a 'net uplift' in socially rented dwellings is 'substantial' or it should incorporate a % target for that uplift. By strengthening the wording of this section A.4 in this way, the overall strategic policy could be supported, in cases when there is a loss of existing affordable housing, and so the policy section could be made sound.</p>	<p>The wording of this section A.4 should be strengthened to ensure that the requirement, where there is a loss of existing affordable housing, for a 'net uplift' in socially rented dwellings is 'substantial' or it should incorporate a % target for that uplift. By strengthening the wording of this section A.4 in this way, the overall strategic policy could be supported, in cases when there is a loss of existing affordable housing, and so the policy section could be made sound.</p>	<p>Comments Noted.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p> <p>The Council has recommended a potential modification for the Inspector to consider which would better clarify what is meant by 'net uplift'. However, the principle of the policy objective is considered to be sound as currently drafted and it is not considered appropriate to prescribe a percentage uplift as this percentage could appear arbitrary. The use of the term 'net uplift' provides a clear and precise way of ensuring the loss of affordable housing can only proceed where it would be justified by an overall uplift in the Borough's social housing stock.</p>
107	Mr Benjamin Chance	LP23	Y	N	Y	Justified, Effective	<p>4. A proposal to require a 50% affordable housing mix is unsound and will ultimately be detrimental to the local area. It is patently poor economics, as developers will retreat from the market or otherwise build low quality housing due to the inability to generate proper returns on their investment accounting for the risk that they are taking. This is poor policy and therefore unsound.</p>		<p>Comments Noted.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p>
108	Mr Aydin Dikerdem (Wandsworth Council)	LP23	Y	Y	Y		<p>As a councillor for just under a decade in Wandsworth, I have seen the need for social housing within our own waiting lists and via the temporary accommodation numbers spiral in an unprecedented way. Given the values that can be derived from development in Wandsworth, there is scope to deliver a much fairer balance of tenures than previous local plans have achieved while ensuring viability. I full endorse this programme of changes.</p>		<p>Support Noted.</p>
109	Raffaele Sava [See also Row 9, 136, 153, 167, 186 and 195]	LP23					<p>I strongly support the commitment to delivering 50% affordable housing, with a greater emphasis on social rented homes. This is crucial for ensuring that local residents, particularly low-income families and key workers, can access secure and genuinely affordable housing. However, I urge the Council to:</p> <ul style="list-style-type: none"> • Strengthen enforcement measures to ensure developers meet these targets. • Prioritize on-site delivery of affordable housing, rather than allowing developers to offer financial contributions in place of affordable units. 	<p>However, I urge the Council to:</p> <ul style="list-style-type: none"> • Strengthen enforcement measures to ensure developers meet these targets. • Prioritize on-site delivery of affordable housing, rather than allowing developers to offer financial contributions in place of affordable units. 	<p>Support Noted.</p> <p>The Council monitors and enforces its planning policies through dedicated teams within the Planning department. Policy LP23 prioritises on-site delivery of housing and only allows for off-site or financial contributions in exceptional cases where it is demonstrated, with evidence, to not be possible to secure affordable housing on-site.</p>
110	Andrew Catto obo the Putney Society	LP23					<p>Policy LP23 – Affordable Housing</p> <p>The Society supports the desire for more housing delivery but we fear that at a time of rising building costs and a continuing fall in the number of development applications, any extra demands on developers will further shrink the supply of new homes of all types. Based on your figures we calculate that at the current level of taxation on development only some 160 'low cost rented' homes are being built in Wandsworth each year. Raising</p>		<p>Comments Noted.</p> <p>Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall</p>

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	[See also Row 26, 137, 154, 168, 187 and 196]						<p>the tax on development makes more sites no longer viable. That's why the only crane in Putney today is on a council owned site.</p> <p>This is particularly true of small sites (LP 23 B) which are often difficult to develop. £50,000 on top of the CIL is 15% of typical local flat values. No profit = no development.</p>		<p>justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p> <p>Requiring an affordable housing contribution from small sites is considered to be justified on the basis of the high local need for affordable housing. The construction of the policy is similar to a large number of other London-based Local Plans which have also been justified on the basis of high local need. There is clear precedent across London that high local need may justify an approach which does not accord with national policy relating to small site affordable housing contributions.</p> <p>The value of the proposed small site contribution has been calculated using a recommended formula derived from the Whole Plan Viability Assessment to ensure it is viable for a majority of small sites. The derivation of the value, and the components of this formula, is set out clearly in the Housing Background Paper.</p> <p>It is the Council's intention to apply any small sites viability assessment process proportionately, in light of the need to avoid delays or administration that is disproportionate to the size of site or wider costs of delivering the site. In taking a simple, evidence-based approach to establishing the value of the small site contribution, and applying a proportionate viability assessment process for those sites which cannot viably provide that contribution, the Council does not consider that there will be a material impact on small sites' delivery in the Borough.</p> <p>Further information on the application of the small sites viability assessment process would be set out in a planned Affordable Housing SPD.</p>

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111	Battersea Society [See also Row 131, 151, 163, 181 and 192]	LP23					<p>LP23 Affordable Housing LP23 A. We welcome the proposal to maximise the delivery of affordable housing within the London Plan strategic target of 50% for all new homes. We also support the tightening of the requirements for on-site, rather than off-site provision of affordable housing; and for developments to be tenure-blind (though Policy LP 23 A3 may need to include a reference to Policy LP 30 with its preference for a separate core for affordable housing). We also support the policy that 70% of affordable homes should be for social rent (thus not including the London Affordable Rent allowed for in the London Plan); and that for the remaining 30%, priority should be given to London Living Rent rather than shared ownership or other products, including Discounted Market Rents. We suggest that this priority should be stated in the policy itself, rather than being relegated to the supporting text.</p> <p>LP23 A4 While we support the new guard in policy against the loss of affordable housing, we have reservations about the wording at the end of the first sentence. We suggest that it should read "the uplift in the number of social rented dwellings"</p> <p>.LP23 C. We have reservations about the proposed charge of £50k per unit for developments on small sites of from one to nine units. We support the measures proposed in paragraph 17.13 to guard against any attempts to evade the threshold for major developments; but we are concerned that, combined with liabilities for CIL, this additional charge may risk failure to build housing on otherwise viable small sites.</p> <p>LP23 D. We support the introduction of a Fast Track Route at an enhanced threshold (as compared with the London Plan) for developments providing 45% affordable housing and meeting the requirements of all relevant parts of LP 23. We have reservations, however, about the requirements for both early and late-stage reviews for those developments that provide between 45% and 50% affordable housing (where no such reviews are required for the latter).</p> <p>LP23 E. We support the proposed use of the Viability Tested Route, but we believe that the final sentence concedes too much. We suggest it should read "to maximise the level of social rented housing to the level suggested by the viability testing".</p>	<p>We also support the policy that 70% of affordable homes should be for social rent (thus not including the London Affordable Rent allowed for in the London Plan); and that for the remaining 30%, priority should be given to London Living Rent rather than shared ownership or other products, including Discounted Market Rents. We suggest that this priority should be stated in the policy itself, rather than being relegated to the supporting text.</p> <p>LP23 A4 While we support the new guard in policy against the loss of affordable housing, we have reservations about the wording at the end of the first sentence. We suggest that it should read "the uplift in the number of social rented dwellings"</p>	<p>Comment Noted.</p> <p>The policy refers to the Council's preference for a form of rented intermediate tenure. The Council is conscious there are a wide range of intermediate products and in the interests of avoiding the policy becoming excessive in its detail, the Council does not consider it necessary to further define preferred tenures or products in the policy, as this is adequately addressed in the supporting text.</p> <p>The Council has recommended a potential modification to the supporting text to Policy LP23 for the Inspector to consider. This modification would further clarify what is meant by 'net uplift' in the context of Part A4.</p> <p>Requiring an affordable housing contribution from small sites is considered to be justified on the basis of the high local need for affordable housing. The construction of the policy is similar to a large number of other London-based Local Plans which have also been justified on the basis of high local need. There is clear precedent across London that high local need may justify an approach which does not accord with national policy relating to small site affordable housing contributions.</p> <p>The value of the proposed small site contribution has been calculated using a recommended formula derived from the Whole Plan Viability Assessment. The derivation of the value, and the components of this formula, is set out clearly in the Housing Background Paper.</p> <p>It is the Council's intention to apply any small sites viability assessment process proportionately, in light of the need to avoid delays or administration that is disproportionate to the size of site or wider costs of delivering the site. In taking a simple, evidence-based approach to establishing the value of the small site contribution, and applying a proportionate viability assessment process for those sites which cannot viably provide that contribution, the Council does not consider that there will be a material impact on small sites' delivery in the Borough.</p> <p>Further information on the application of the small sites viability assessment process would be set out in a planned Affordable Housing SPD.</p> <p>The application of a Late Stage Review for Fast Tracked developments providing between 45-50% is intended to provide further incentive for applicants to maximise the amount of affordable housing they deliver in the context of the overall 50% strategic target set out in both the London Plan and Council's Local Plan.</p> <p>Further justification on the use of review mechanisms in the proposed policy is set out in the Housing Background Paper.</p>

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								<p>The wording of Paragraph E indicates that proposals which follow the Viability Tested Route will be expected to maximise the level of social rented housing. The Council consider this wording, in the context of the preceding sentences, to clearly relate to the maximum level of social rented housing indicated by viability testing.</p>	

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112	Miss Katherine Stewart obo Shelter	LP23	Y	Y	Y		As long as the plan is followed, the social rent is both affordable and reasonable, and service charges are not prohibitive and exclusionary. Also, that any increases in Rent and Service Charges are kept affordable.		Support Noted.
113	Maurice Mcleod (Wandsworth Council) [See also Row 138, 155, 169, 188 and 202]	LP23	Y	Y	Y		I agree with the proposed policy		Support Noted.
114	Mariam Jatta	LP23	Y	N	N	Positively prepared, Justified, Effective, Consistent with national policy	2. Apologies but this is not how economics works, if you mandate policies that are not feasible/profitable from the perspective of the homebuilders, they simply won't build, which will actually exacerbate the housing crisis. The best bet is to build taller/denser/beautiful buildings, with an income mix within them. As we know the only way a housebuilder will be incentivised to make 50% of homes 'affordable' means they would have to sell a multi-million flat for them to breakeven. This is pure common economic sense, please don't make things worse and continue to go down the path of unintentionally leading to lower house construction! 5. speak to the homebuilders, understand their business model, they will quickly tell you that if you mandate 50% absolutely none of them will build anymore. Instead, co-operate with the government in finding ways to lower the costs for them to build more, at the end of the day they are a business not a charity!	speak to the homebuilders, understand their business model, they will quickly tell you that if you mandate 50% absolutely none of them will build anymore. Instead, co-operate with the government in finding ways to lower the costs for them to build more, at the end of the day they are a business not a charity!	Comments Noted. Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.
115	Leonie Charmes [See also Row 139, 156, 170, 189 and 197]	LP23	N	N	N	Positively prepared; justified; effective; consistent with national policy	This policy is economic suicide for housing supply in Wandsworth. The 50% affordable housing mandate is a massive tax on development, ensuring fewer homes get built. You cannot subsidize half of a product and expect more of it to appear. Developers are not charitiesâ€”if projects are unprofitable, they won't happen. The result? Less housing, higher prices, and an even worse affordability crisis. This is a self-defeating policy. If the goal is more affordable homes, the only way to achieve that is by increasing supply. Instead, this plan throttles development, making new projects financially unviable. Forcing developers to provide 70% of 'affordable' units as social rented housing only makes it worse. Social housing requires heavy subsidy, meaning market-rate buyers shoulder the cost. This either inflates prices for private buyers or kills projects altogether. The idea that off-site provision or financial contributions will solve this is laughable. If you extract more from developers than projects can sustain, they simply won't build. The financial contribution requirements on small sites (1-9 dwellings) are even more absurd. A Â£50,000 per unit levy is a direct attack on small-scale developmentâ€”the kind most likely to be delivered by local builders rather than big corporations. This effectively bans small developments, ensuring only large, deep-pocketed firms can participateâ€”firms that will simply avoid Wandsworth altogether. The so-called 'Fast Track Route' is a bureaucratic trap. The idea that developers should be rewarded with fewer viability assessments for handing over 50% of their units below market value is absurd. No serious	The proposed policy is unsound on all four counts: Not Positively Prepared -This policy does not meet Wandsworth's housing needs. A 50% affordable housing mandate is a direct disincentive to development, meaning fewer homes will be built overall. The result will be higher prices, worsening affordability for everyone. A sound policy would focus on increasing total housing supply, not obstructing it. Not Justified -There is no evidence that this policy will achieve its intended goal. If anything, real-world examples suggest the opposite: excessive affordability mandates reduce housing supply, making housing scarcer and more expensive. The viability requirements and forced tenure splits further discourage investment. This policy is built on ideological wishful thinking, not economic reality. Not Effective -A policy that	Comments Noted. Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper. Requiring an affordable housing contribution from small sites is considered to be justified on the basis of the high local need for affordable housing. The construction of the policy is similar to a large number of other London-based Local Plans which have also been justified on the basis of high local need. There is clear precedent across London that high local need may justify an approach which does not accord with national policy relating to small site affordable housing contributions. The value of the proposed small site contribution has been calculated using a

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							investor will touch these projects because they cannot make a return. The constant review mechanisms and public subsidy clawbacks just add more uncertainty, making investment even less attractive. Finally, refusing to allow Vacant Building Credit (VBC) is another nail in the coffin. VBC exists to encourage redevelopment of unused buildings. Banning it in Wandsworth ensures that viable projects are abandoned, leaving derelict sites empty instead of being turned into new homes. The proposed policy is unsound on all four counts: Not Positively Prepared - This policy does not meet Wandsworth's housing needs. A 50% affordable housing mandate is a direct disincentive to development, meaning fewer homes will be built overall. The result will be higher prices, worsening affordability for everyone. A sound policy would focus on increasing total housing supply, not obstructing it. Not Justified - There is no evidence that this policy will achieve its intended goal. If anything, real-world examples suggest the opposite: excessive affordability mandates reduce housing supply, making housing scarcer and more expensive. The viability requirements and forced tenure splits further discourage investment. This policy is built on ideological wishful thinking, not economic reality. Not Effective - A policy that prevents development is inherently ineffective. By making housing projects unprofitable, this policy ensures that fewer homes are affordable or otherwise built. Developers will simply build elsewhere, avoiding Wandsworth altogether. No homes mean no affordable homes. Not Consistent with National Policy - The National Planning Policy Framework (NPPF) requires policies to be deliverable. This is not. The NPPF also emphasizes boosting housing supply to meet local needs. By undermining development viability, this policy contradicts that objective. Moreover, national policy encourages a flexible approach to affordable housing contributions, which this policy blatantly ignores. There is no true way to rescue this policy. The closest way would be to lower this mandate to < 5%.	prevents development is inherently ineffective. By making housing projects unprofitable, this policy ensures that fewer homes are affordable or otherwise built. Developers will simply build elsewhere, avoiding Wandsworth altogether. No homes mean no affordable homes. Not Consistent with National Policy -The National Planning Policy Framework (NPPF) requires policies to be deliverable. This is not. The NPPF also emphasizes boosting housing supply to meet local needs. By undermining development viability, this policy contradicts that objective. Moreover, national policy encourages a flexible approach to affordable housing contributions, which this policy blatantly ignores. There is no true way to rescue this policy. The closest way would be to lower this mandate to < 5%.	recommended formula derived from the Whole Plan Viability Assessment to ensure it is viable for a majority of small sites. The derivation of the value, and the components of this formula, is set out clearly in the Housing Background Paper. It is the Council's intention to apply any small sites viability assessment process proportionately, in light of the need to avoid delays or administration that is disproportionate to the size of site or wider costs of delivering the site. In taking a simple, evidence-based approach to establishing the value of the small site contribution, and applying a proportionate viability assessment process for those sites which cannot viably provide that contribution, the Council does not consider that there will be a material impact on small sites' delivery in the Borough. Further information on the application of the small sites viability assessment process would be set out in a planned Affordable Housing SPD.
116	Jenny Scott-Thompson [See also Row 140]	LP23		Y	Y		2. Thank you for increasing the requirements for social housing and genuinely affordable housing. We really need this for our local community to be healthy.		Support Noted.
117	Jamie Banks [See also Row 141, 171 and 190]	LP23	N	N	N	Positively prepared, Justified, Effective, Consistent with national policy	Struggling to work out if you are morons, or purposely introducing aristocratic anti-housing policies under stealth. I would almost have more respect if you were truly self interested and representing the views of your richest inhabitants, bourgeoisie land owners, but all but preventing any new development. However I sense you are actually well intentioned, and just incredibly dim. I wonder if any of you have taken even a first year economics course?	Struggling to work out if you are morons, or purposely introducing aristocratic anti-housing policies under stealth. I would almost have more respect if you were truly self interested and representing the views of your richest inhabitants, bourgeoisie land owners, but all but preventing any new development. However I sense you are actually well intentioned, and just incredibly dim. I wonder if any of you have taken even a first year economics course?	Comment Noted. Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.
118	James King	LP23	Y	Y	Y		I support the proposals as building more is the only way out of this housing crisis		Support Noted.
119	Dr Fay Dowker	LP23	Y	Y	Y		I am a resident of Wandsworth. The policy is clear and comprehensive. It will improve the quality of life and that of my family and neighbours. The prioritisation of genuinely		Support Noted.

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							affordable housing is in line with the economic and social needs of the borough. The borough needs housing that is genuinely affordable by working people, including teachers, doctors, nurses, council workers, retail staff, restaurant staff, so that the essential people we need to work here can live here too, boosting our economy.		
120	Dr Antonio Fidalgo [See also Row 157]	LP23	Y	Y	Y		I agree with the 50% affordable housing. Moreover, I propose that the very small plots that would only house 1 or 2 home to be made available to local self-builder on the relevant register to further promote affordable housing to local residents.	Support Noted.	
121	Alex Long	LP23	N	N	N	Consistent with national policy	<p>4. It should be noted explicitly that a proposed development that complies with the local plan on affordable housing targets will still need to comply with other aspects of the local plan, e.g. on building heights. Compliance on affordable housing is not to be used as a way to circumvent any other planning requirements.</p> <p>5. It should be noted explicitly that a proposed development that complies with the local plan on affordable housing targets will still need to comply with other aspects of the local plan, e.g. on building heights. Compliance on affordable housing is not to be used as a way to circumvent any other planning requirements.</p>	<p>It should be noted explicitly that a proposed development that complies with the local plan on affordable housing targets will still need to comply with other aspects of the local plan, e.g. on building heights. Compliance on affordable housing is not to be used as a way to circumvent any other planning requirements.</p> <p>Comment Noted. Planning applications will be considered against all relevant policies within the development plan and it is not necessary to state explicitly that compliance with one policy will not preclude the need to comply with other relevant policies.</p>	

LP24 – Housing Mix

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122	Alice You obo. VSM (NCGM) Ltd. [See also Rows 37, 44, 147, 161, and 176]	LP24		N		Justified	<p>LP24 – Housing Mix London Plan conformity London Plan Policy H10(A) does not set prescriptive standards for housing mix. However, H10(A)(1) requires housing mix to be informed by “robust local evidence of need”. As set out in the 'justified' section below, there is not considered to be robust evidence providing a demonstrable change in need since the adoption of the Local Plan in July 2023.</p> <p>NPPF: positively prepared</p> <p>No comment</p> <p>NPPF: justified</p> <p>Draft Policy LP24 sets out the dwelling mix required for both market and affordable housing provision, which provides a change from the current adopted position. Regarding the market dwelling mix, there is a reduction to the targeted 1-bedroom units from 30-40% to 20-30%, with no other proposed changes to the target proportions of other market housing sizes.</p> <p>The justification for these changes to the housing mix are not apparent in the evidence base supporting documents that accompany the Local Plan Partial Review.</p> <p>It is noted that these documents comprise a Housing Needs Assessment, dated December 2024, prepared by Opinion Research Services. This is understood to provide an update to the Wandsworth Local Housing Needs Assessment prepared in December 2020 by GL Hearn, which was prepared to support the current adopted policy and found sound and adopted in July 2023. However, it is not considered in the first instance that this updated Needs Assessment provides comparable or sufficient evidence to justify a deviation from such a recently adopted policy. The updated study does not provide significant analysis of required mix or makes policy recommendations for amendments to the mix, and what the changing factors are resulting in the required update to the policy over a short period of time, specifically in relation to market housing 1 bedroom provision. The rationale for decreasing proportions of 1-bedroom market units within LBW's dwelling mix in the draft policy is set out in section 17 of the Local Plan Partial Review Housing Background Paper (Jan 2025) which states that updated demographic modelling within the Council's Housing Needs Assessment (2024) identifies much lower requirements of 6% need for market 1 bedroom dwellings, set out at Table 13. The details set out at Table 13 appear to be extrapolated from Figure 1 in the Housing Needs Assessment (2024).</p> <p>The Housing Needs Assessment dated December 2020, which underpins the recently adopted Local Plan (2023), sets out existing household type splits and projected changes (see Table 29 of the study), factoring in number of adults, ages and dependents in a</p>	<p>The proposed amendments to the market housing mix proposed in the draft Policy are considered to be unsubstantiated and not supported by “robust local evidence of need” as required by the London Plan to demonstrate the proposed substantial changes, particularly to the 1-bedroom market units requirement. As such, it is considered that the policy does not require update.</p>	<p>Comments Noted.</p> <p>As set out in the Housing Background Paper, the borough-level indicative proportions in the policy strike a balance between demographically modelled need and other considerations, including market considerations. The Council's Housing Needs Assessment identifies a large need for family market dwellings and a relatively small need for one-bed properties. Whilst family dwellings are the priority in the Borough, the proportion of one-beds allowed for within these indicative proportions has been retained at a relatively high level to ensure the policy remains effective and justified. The Council considers it to be important that its housing mix policy sets an effective strategy for meeting identified local housing needs, which includes the needs for different sizes of home, in line with national policy. Further justification for Policy LP24 can be found in the Housing Background Paper.</p> <p>The Housing Needs Assessment (2024) provides a clear assessment of the Borough's future housing mix, including in terms of housing mix. It follows a methodology that accords with the Planning Practice Guidance. It is more up-to-date than previous Housing Needs Assessments which the Council considers to be unreliable.</p>

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							<p>household. In contrast, the December 2024 study focuses on changes in age of demographic only (see figure 6) and is reliant on a number of unsubstantiated assumptions on the behaviour and lifestyle preferences of different demographics. For example:</p> <ul style="list-style-type: none"> • It is assumed that down-sizing is less likely to take place given that “there is no mechanism in place to compel smaller households to downsize, so we do not assume that any under-occupying households will move to a smaller property.” (paragraph 17 of the Housing Needs Assessment 2024). This statement and assumption do not appear to be substantiated in either document. • Paragraph 5.55 of the Housing Needs Assessment (2024) identifies a projected fall in single person households aged 25-34 years by 3,490 in Wandsworth in the period to 2041, whilst the number of ‘Other’ households headed by someone aged 25-34 years is projected to rise by 4,110. The Assessment attributes this to the increasing pressures for social housing and rising private rents, seeing fewer young households living on their own and an increasing number living in HMO-style accommodation. <p>Furthermore, paragraph 5.62 concludes that “it is difficult to project a need for studio apartments or co-housing schemes aimed at young single person and couples because it may be that many young people prefer to share and save for their own property rather than have their own more expensive separate unit.” The Housing Needs Assessment characterises the trend of increasing use of HMO-style accommodation for these groups both as a consequence of rising house prices and social housing pressures (paragraph 5.55) as well as a “preference” (paragraph 5.62). It is considered that this trend is not necessarily a preference, within a context of rising house prices/social housing pressures.</p> <p>It is considered that in addition to recognising preferences and pressures of different demographics and individuals, the Local Plan should seek to positively drive housing delivery and affordable housing delivery, which should aid in addressing living costs. Such an assessment, based on unsubstantiated assessment of preferences, also fails to acknowledge that there is also a growing cohort of young adults that are not driven by ownership, but by quality, amenity and location.</p> <p>This approach to the methodology in the Housing Needs Assessment 2024 is also noted to result in a much lower need for market 1 bedroom units, suggesting that this is only 6%- as identified in Table 13 of Housing Background Paper (2025) and Figure 1 in the Housing Needs Assessment (2024). Whilst it is acknowledged and supported that the draft policy does not seek to lower the target in the draft policy for this tenure and type so drastically, such a significant reduction in need between the Needs Assessment carried out in 2020 and that carried out in 2024, demonstrates a distinct difference in approach between the two Assessments. It cannot be assumed, without further evidence, that Wandsworth’s need has changed so drastically in such a short period of time, and that the methodology and approach of considering age demographics as a key factor is therefore more accurate or valid than the household-type approach set out in the 2020 Needs Assessment, which was ultimately found sound and adopted, only a year prior. As such, it is considered that the Evidence Base does not fully account for, or justify, a reduction in market 1-bedroom</p>		

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						<p>dwelling. Insufficient justification is presented within the evidence base to justify the proposed reduction. There is a clear need for all unit sizes and 1-bedroom market dwellings are in high demand within LB Wandsworth, particularly in highly accessible, mixed-use regeneration areas. The lack of robust evidence to justify the change risks the ability to provide the borough-wide housing need requirements. Normal fluctuations in the housing market in relation to demand and preference are also considered to be already accounted for within the policy, under Part E which sets out separate considerations to be considered on a site-by-site basis. This is considered sufficient to address any changes since the adoption of the current Local Plan, and any adjustments going forward over the 5 years of the Plan period prior to review. As such, the inclusion of Part E is supported.</p> <p>NPPF: effective No comment</p> <p>NPPF: consistent with national policy No comment</p> <p>Suggested amendments to policy</p> <p>The proposed amendments to the market housing mix proposed in the draft Policy are considered to be unsubstantiated and not supported by "robust local evidence of need" as required by the London Plan to demonstrate the proposed substantial changes, particularly to the 1-bedroom market units requirement. As such, it is considered that the policy does not require update.</p>			

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123	Zelie Batchelor obo Watkin Jones [See also Row 38, 43, 146, 162 and 178]	LP24		N		Positively prepared; justified; effective; consistent with national policy	<p>LP24: Housing Mix</p> <p>The proposed updated wording of Policy LP24 is as follows:</p> <div style="border: 1px solid black; padding: 5px;"> <p>LP24 Housing Mix</p> <p>A. Development proposals creating additional residential units will be supported where the market housing dwelling mix:</p> <ol style="list-style-type: none"> Includes a range of dwelling sizes to address local need, including for family-sized housing and down-sizing; Takes into account the existing housing stock in the neighbourhood in order to avoid any over-concentration of a single size of homes, where this would undermine the achievement of creating mixed and balanced communities; and Contributes to the borough-level indicative proportions detailed below: <table border="1"> <thead> <tr> <th>Tenure</th> <th>1 Bed</th> <th>2 Bed</th> <th>3 Bed</th> <th>4 Bed</th> </tr> </thead> <tbody> <tr> <td>Market</td> <td>20-30%</td> <td>30-40%</td> <td>15-25%</td> <td>5-10%</td> </tr> </tbody> </table> <p>B. Development proposals creating 10 or more units (gross), will not be supported where 1 person/studio accommodation exceeds 5% of all market units. 1 person/studio accommodation will only be supported within the market element of the housing to be provided.</p> <p>C. Planning applications will be required to be supported by evidence, proportionate to the nature and scale of development proposed, to justify the mix of new market homes to be provided.</p> <p>D. Development proposals will be supported where the affordable housing dwelling mix contributes to the borough-level indicative proportions detailed below:</p> <table border="1"> <thead> <tr> <th>Tenure</th> <th>1 Bed</th> <th>2 Bed</th> <th>3 Bed</th> <th>4 Bed</th> </tr> </thead> <tbody> <tr> <td>Rented</td> <td>30-40%</td> <td>30-40%</td> <td>25-35%</td> <td>10-15%</td> </tr> <tr> <td>Intermediate</td> <td>35-45%</td> <td>45-55%</td> <td>0-5%</td> <td>0-5%</td> </tr> </tbody> </table> <p>E. The dwelling mix will be considered on a site by site basis and in applying the preferred housing mix regard will be given to:</p> <ol style="list-style-type: none"> Current evidence in relation to housing need; The surrounding context and character; The overall level of affordable housing proposed; and The financial viability of the scheme. </div> <p>We note that the changes to the preferred housing mix mirrors the 'Wandsworth Housing Needs Assessment' (2024), which forms part of the supporting documentation of this Local Plan Partial Review.</p> <p>The following comment is made in relation to Part C.</p> <p><u>C. Planning applications will be required to be supported by evidence, proportionate to the nature and scale of development proposed, to justify the mix of new market homes to be provided.</u></p> <p>We would recommend that further clarification is required to ascertain that if a planning application broadly aligns with LBW's indicative housing mix, it should not be required to</p>	Tenure	1 Bed	2 Bed	3 Bed	4 Bed	Market	20-30%	30-40%	15-25%	5-10%	Tenure	1 Bed	2 Bed	3 Bed	4 Bed	Rented	30-40%	30-40%	25-35%	10-15%	Intermediate	35-45%	45-55%	0-5%	0-5%	<p>LP24 Housing Mix</p> <p>A. Development proposals creating additional residential units will be supported where the market housing dwelling mix:</p> <ol style="list-style-type: none"> Includes a range of dwelling sizes to address local need, including for family-sized housing and down-sizing; Takes into account the existing housing stock in the neighbourhood in order to avoid any over-concentration of a single size of homes, where this would undermine the achievement of creating mixed and balanced communities; and Contributes to the borough-level indicative proportions detailed below: <table border="1"> <thead> <tr> <th>Tenure</th> <th>1 Bed</th> <th>2 Bed</th> <th>3 Bed</th> <th>4 Bed</th> </tr> </thead> <tbody> <tr> <td>Market</td> <td>20-30%</td> <td>30-40%</td> <td>15-25%</td> <td>5-10%</td> </tr> </tbody> </table> <p>B. Development proposals creating 10 or more units (gross), will not be supported where 1 person/studio accommodation exceeds 5% of all market units. 1 person/studio accommodation will only be supported within the market element of the housing to be provided.</p> <p>C. Where the proposed housing mix does not broadly align with the borough-level indicative proportions, Planning applications will be required to be supported by evidence proportionate to the nature and scale of development proposed, to justify the mix of new market homes to be provided.</p> <p>D. Development proposals will be supported where the affordable housing dwelling mix contributes to the borough-level indicative proportions detailed below:</p>	Tenure	1 Bed	2 Bed	3 Bed	4 Bed	Market	20-30%	30-40%	15-25%	5-10%	<p>Comment Noted.</p> <p>Part C of Policy LP24 clearly identifies that any evidence required to justify the mix of new market homes to be provided will be proportionate to the nature and scale of development proposed. Where a development proposal falls within the indicative proportions set out in Table 17.1, the Council would not envisage a need for particular evidence to justify this housing mix.</p>
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							provide justification for the proposed mix. Evidence to support the proposed mix should only be required if the mix departs significantly from the borough's indicative housing mix.		
124	Rory Chambers obo Southside Limited Partnership [See also Row 50]	LP24					<p>Furthermore, the proposed amendments to Policy LP24 (Housing Mix) will further add to growing viability pressures by reducing the average price per square foot of homes, as larger unit types typically achieve lower prices per square foot. In turn, this reduction impacts the ability of schemes to fund affordable housing.</p> <p>Conclusion</p> <p>As a significant landowner within Wandsworth, the Southside Limited Partnership has concerns that the revisions proposed to the policies within the Wandsworth Local Plan will detrimentally impact and constrain the viability and deliverability of new development in the Borough. As set out above, the proposed revisions to Policy LP23 and LP24 do not align with the reality where increased costs have resulted in new building starts in Wandsworth being at their lowest level for four years.</p> <p>For Wandsworth to continue as a growing and economically competitive borough, the Southside Limited Partnership believe that the following amendments should be made to the draft Local Plan:</p> <ul style="list-style-type: none"> • Policy LP23(A)'s strategic target for affordable housing should be reduced; • Policy LP23(C)'s affordable housing target should be reduced; • The Fast Track route in LP23(D) should be amended to 35%, in line with the London Plan; and • LP24(A) should be amended to remove prescriptive minimum and maximum proportions of market dwelling types. 	LP24(A) should be amended to remove prescriptive minimum and maximum proportions of market dwelling types.	Comment Noted. The Council's Whole Plan Viability Assessment incorporates sensitivity testing on the basis of different housing mix scenarios. The justification for Policy LP24 (and other policies) is set out further in the Housing Background Paper.
125	James Stevens obo Home Builders Federation [See also Row 40, 46 and 199]	LP24		N		Effective; Consistent with national policy	<p>Policy LP24: Housing Mix</p> <p><u>The size mix proposed is too prescriptive and could prove ineffective.</u></p> <p>The RP sector is anxious to have much greater say over the size, as well as tenure, of the affordable housing element of residential schemes. RPs are much less inclined to contract to purchase S106 affordable housing where the sizes of the homes offered fail to reflect the types of homes that complement their own business case. Owing to the financial pressures on the RP sector, RPs are giving much greater thought to the type of homes that they can rent (and sometimes sell – like shared ownership) most profitably.</p> <p>If planning policy on size is too prescriptive, then this could mean that market housebuilders are left with S106 affordable homes that they are unable to sell to an RP. It could also mean that schemes are not progressed if the local plan policy tends to militate against the type of homes customers want – including the RP sector. The G15 group of RSLs is about to publish guidance for housebuilders on how to manage the current S106 affordable housing impasse. One piece of the G15 advice is for housebuilders to engage</p>		<p>Comment Noted. Policy LP24 has been designed to provide indicative borough-level proportions which balance need with other considerations. The justification for Policy LP24 is set out in more detail in the Housing Background Paper.</p> <p>The Council consider it important that its policies set an appropriate strategy for meeting local housing needs, which includes housing needs on the basis of dwelling size. The Council's approach to housing mix is considered to accord with national policy. The Council does not consider Policy LP24 to be overly prescriptive, but rather that in setting indicative borough-level proportions, the policy retains deliberate flexibility to have regard to site-by-site circumstances. Part E to the policy sets a clear mechanism for development proposals which differ from the indicative borough-level proportions to receive permission where individually justified (including on the basis of current evidence which would include evidence of changing circumstances).</p> <p>Part C of Policy LP24 clearly identifies that any evidence required to justify the mix of new market homes to be provided will be proportionate to the nature and</p>

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						<p>at an early stage with RPs about the size and tenure of the affordable homes that could be provided, to ensure these match the business requirements of the RP sector, i.e. homes that they can rent at the rent levels they require. This is not possible, if local plan policy is highly prescriptive on these matters.</p> <p>Parts A and D say that the preferred size mix is meant to serve as an indication. It will be important for the Council to reflect on the needs of the RP sector to ensure that the Council's preferences accord with the expectations of the RP sector.</p> <p>Part C states that planning applications will need to be supported by evidence to justify the size mix. <u>This is unsound because it is unjustified and contrary to national policy.</u> If the application accords with policy LP24 in terms of the size mix specified there is no need for further evidence. Paragraph 16 of the NPPF states that local plans must:</p> <p>d) contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.</p> <p>We operate within a plan-led system. The local plan must provide sufficient information to enable an applicant to submit, with confidence, an application that s/he should be entitled to expect to be approved within the statutory period, especially if it accords with the policies of the development plan. We realise that in London, that might be highly unlikely, owing to the volume of planning policy in both the London and local plans, but that is a problem, and it is contributing to the crisis in housing delivery (especially as all applications are forced down the viability testing route). Nevertheless, it must remain the aim that applications that accord with the development plan should be approved as quickly as possible. Applications that depend on the production of evidence and a viability assessment must be the exception, not the rule. It is unsound for local policies to stipulate the need to produce additional evidence by the applicant.</p> <p><u>Part E is also unsound for the same reasons as Part C is unsound. It is contrary to national policy.</u></p>		<p>scale of development proposed. Where a development proposal falls within the indicative proportions set out in Table 17.1, the Council would not envisage a need for particular evidence to justify this housing mix. However, where a development proposal falls partly or wholly outside those indicative proportions, the provision of proportionate evidence to justify the proposed housing mix is considered to be justified and effective. Likewise, Part E of the policy allows for flexibility to depart from the borough-level indicative proportions where justified. Requiring proposals which do not meet the full requirements of a policy to produce evidence to justify this is not considered to be unsound but rather a consistent principle applied across the Local Plan as a whole.</p> <p>Both Part C and E to the policy are not proposed to change relative to the adopted Wandsworth Local Plan (2023-2038) which was found to be sound and subsequently adopted in 2023.</p>	

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126	Chris Wheaton obo St George's plc [See also Row 53]	LP24				<p>Do you consider the Local Plan is unsound because it is not:</p>	<p>Policy LP24 Housing Mix Policy LP24(A) provides an indicative mix for market homes. The mix includes a minimum of 20% 3 bed+ homes and limits studio dwellings to 5% of a scheme. As noted under Policy LP23 above, viability within Wandsworth is extremely challenging and very few homes are currently coming forward. The proposals within LP24(A) will add to pressure on viability, reducing the average price per square foot of homes (larger unit types tending to achieve lower prices on a per square foot basis) and therefore the ability of schemes to fund affordable homes.</p> <p>The proposal to limit studio units is also in conflict with forecast population changes in the borough. ONS projections indicate total household growth in Wandsworth over 25 years of 15,545. Of this total 7,749 (50%) are projected to be single person households. Restricting the delivery of smaller unit types to 5% will therefore put this well below the need arising.</p> <p>Whilst it is acknowledged that supporting text to the policy indicates viability can inform the unit type mix, this creates uncertainty for developers considering acquiring land and also means that viability may be needed for otherwise Fast Track applications, delaying progress.</p> <p>Given all of the above, the following changes should be made to draft policy LP24: • LP24(A) should be amended to remove prescriptive minimum and maximum proportions of market dwelling types</p> <p>I hope the above is useful in informing the local plan process. Quod and St George would be pleased to discuss any matters with the council if helpful and would request the ability to participate in the local plan hearings should the suggested changes not be incorporated.</p>	<p>Given all of the above, the following changes should be made to draft policy LP24: • LP24(A) should be amended to remove prescriptive minimum and maximum proportions of market dwelling types</p>	<p>Support Noted.</p> <p>As set out in the Housing Background Paper, the borough-level indicative proportions in the policy strike a balance between demographically modelled need and other considerations, including market considerations. The Council's Housing Needs Assessment identifies a large need for family market dwellings and a relatively small need for one-bed properties. Whilst family dwellings are the priority in the Borough, the proportion of one-beds allowed for within these indicative proportions has been retained at a relatively high level to ensure the policy remains effective and justified. The Council considers it to be important that its housing mix policy sets an effective strategy for meeting identified local housing needs, which includes the needs for different sizes of home, in line with national policy. The Council does not consider it to be effective or justified to reduce the proportion of family-sized homes, or increase the proportion of one-beds, as this would risk the policy ceasing to be effective in meeting local needs as suggested by the Housing Needs Assessment. A range of housing mix requirements have been tested as part of the Whole Plan Viability Assessment which, when considered across the Council's policy proposals as a whole, suggests a majority of likely site typologies remain viable. Notwithstanding this fact, there remains provision for significant flexibility in Part E of Policy LP24 which clearly states that the financial viability of a scheme can be taken into account when justifying the dwelling mix on a site by site basis. Further justification for Policy LP24 can be found in the Housing Background Paper.</p> <p>The 5% 'cap' on studio dwellings is considered to be a justified and effective measure to ensure that new homes contribute to supporting the creation of stable local neighbourhoods and cohesive communities. The Housing Needs Assessment projects a very small need for one-bed properties in the Borough. However, the policy has been deliberately drafted to offer flexibility where justified by evidence. Developments proposing a higher level of studio dwellings would be capable of exceptional justification based on evidence.</p> <p>Further justification to the policy approach is set out in the Housing Background Paper.</p>

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127	Chris Wheaton obo SGN Mitheridge [See also Row 54]	LP24					LP24 Housing Mix A&B (Unit Type Mix) Maximising family accommodation in social rent homes is supported and requires cross-subsidy from market homes. At present the requirements for market sale 3 and 4 bed homes will reduce the value achievable for these on a per square foot basis and therefore threaten scheme viability / the ability to follow the Fast Track route. The requirements are also at odds with ONS population projections for the borough which indicate that 50% of all household growth will be for single person households, with no growth at all in the number of family households.		Comment Noted. As set out in the Housing Background Paper, the borough-level indicative proportions in the policy strike a balance between demographically modelled need and other considerations, including market considerations. The Council's Housing Needs Assessment identifies a large need for family market dwellings and a relatively small need for one-bed properties. Whilst family dwellings are the priority in the Borough, the proportion of one-beds allowed for within these indicative proportions has been retained at a relatively high level to ensure the policy remains effective and justified. The Council considers it to be important that its housing mix policy sets an effective strategy for meeting identified local housing needs, which includes the needs for different sizes of home, in line with national policy. The Council does not consider it to be effective or justified to reduce the proportion of family-sized homes, or increase the proportion of one-beds, as this would risk the policy ceasing to be effective in meeting local needs as suggested by the Housing Needs Assessment. A range of housing mix requirements have been tested as part of the Whole Plan Viability Assessment which, when considered across the Council's policy proposals as a whole, suggests a majority of likely site typologies remain viable. Notwithstanding this fact, there remains provision for significant flexibility in Part E of Policy LP24 which clearly states that the financial viability of a scheme can be taken into account when justifying the dwelling mix on a site by site basis. Further justification for Policy LP24 can be found in the Housing Background Paper. The Housing Needs Assessment provides a clear assessment of the Borough's future housing mix, including in terms of housing mix. It follows a methodology that accords with the Planning Practice Guidance and includes analysis of ONS population projections.
128	Paul McDonnell obo Battersea & Wandsworth Trades Union Council [See also Row 77]	LP24					Policy LP24 - The BWTUC supports the housing mix proposals.		Support Noted.
129	Ms Tamara Flanagan [See also Row 160, 175 and 191]	LP24	Y	Y	Y		I fully support the proposed policy-would want to see also housing specified for key workers. I fully Support the Policy detail on Housing mix		Support Noted.

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130	Ms Janine Streuli [See also Row 93 and 145]	LP24	Y	Y	Y		A good mix of sizes is proposed. A larger number of family sized homes (3 bedroom +) would be desirable.	A larger number of family sized homes (3 bedroom +) would be desirable.	Support Noted. The Council has set indicative dwelling mix ranges which seek to strike an appropriate balance between different considerations. Further justification for the policy can be found within the Housing Background Paper and drawing upon evidence from the Housing Needs Assessment.
131	Battersea Society [See also Row 111, 151, 163, 181 and 192]	LP24					LP24 Housing Mix We are disappointed by the very minor changes to the indicative proportions of dwelling sizes, which we believe require much more significant change. To suggest that up to 30% of market housing, and 40-45% of affordable housing should be provided as one-bed units flies in the face of all evidence. The recent Housing Needs Assessment (HNA) indicates that more than 4,000 households are currently overcrowded in affordable housing, and many have been waiting several years for moves to larger dwellings. It also shows that both in the private rented and in the owner-occupied sectors, the largest increases in prices arise when residents move from two-bedroom to larger flats and houses. This indicates high demand for larger dwellings. And a core conclusion of the HNA is that "the highest need is for 2 and 3 bedrooms; approaching 70% of the overall affordable need is for 2 and 3-bedroom properties". Nothing in the HNA suggests that anything remotely approaching the minimum range proposed for one-bedroom dwellings - 20% for market housing and 30-35 for affordable housing - is required as a response to housing need. We must therefore urge that the indicative ranges for such dwellings be reduced to match the evidence presented in the HNA.		Comment Noted. As set out in the Housing Background Paper, the borough-level indicative proportions have been informed by a range of evidence, including demographic modelling contained within the Housing Needs Assessment, the composition of the Council's Housing Waiting Lists and wider market signals and considerations. As a result, whilst family dwellings are the priority in the Borough, the proportion of one-beds allowed for within these indicative proportions has been retained at a relatively high level to ensure the policy remains effective and justified. The Council does not consider it to be effective or justified to set an indicative range which severely restricts one-bed properties given the reasonably high need for affordable one-bed properties indicated by the Council's Housing Waiting Lists and the need to balance the types of developments that make up the Council's housing supply (including a large proportion of flatted developments) and the need to maximise the potential of developable land within the Borough in the context of the Borough's housing requirement, which will together support a need to target a higher proportion of one-bed dwellings than indicated by demographic modelling alone. Further justification on the borough-level indicative proportions is set out in the Housing Background Paper.
							But further, we have strong reservations about both the HNA's methodology and some of its conclusions, especially its focus on two-bedroom dwellings. This seems to derive from its finding that half of the increase in projected households between now and 2038 will derive from couples without children; but nearly half of that increase derives from couples over the age of 65, not from inward migration or household formation. Most couples in that age group will thus already be resident in dwellings in Wandsworth, rather than in need of new housing, unless they decide to downsize; and the evidence shows they have a marked reluctance to do so. Since the HNA suggests that fewer of them are leaving the borough than in the past, the overall supply of larger houses depends increasingly on their demise. But the biggest problem with the HNA is its sole focus on need and demand (with a marked tendency to present the two as equivalent). It fails, like previous exercises, to acknowledge that supply and demand are inextricably linked. The result has been over many years policies promoting an over-supply of one-bedroom and two-bedroom dwellings, which attract the young adults who, as the HNA and much other data shows, come to the borough from elsewhere to live in such dwellings; but then move out when they need the larger dwellings with three or more bedrooms of which there is a restricted supply in the borough. This militates against creating and sustaining the mixed and balanced communities that are repeatedly claimed to be core aims for the Council. It is not easy to understand why the Council wishes to continue with policies on housing mix that	To repeat, the indicative proportions must be changed radically, away from any significant supply of one-bedroom dwellings, and towards more larger dwellings. If not, the revised Plan will fail the soundness test set out in the NPPF paragraph 36.	The Housing Needs Assessment follows a methodology which accords with the requirements of the Planning Practice Guidance and which has informed a large number of sound plans. The Housing Needs Assessment is also clear in how it uses and interprets a range of publicly available data in reaching its conclusion. The Council has confidence in the methodology and findings of the Housing Needs Assessment.

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							contradict those aims. To repeat, the indicative proportions must be changed radically, away from any significant supply of one-bedroom dwellings, and towards more larger dwellings. If not, the revised Plan will fail the soundness test set out in the NPPF paragraph 36.		
132	Mr Samuel Nodet Owers [See also Row 98, 164 and 182]	LP24	Y	N	Y	Positively prepared, Justified, Effective, Consistent with national policy	More regulations like this make it more expensive to build more houses which is ultimately footed by the buyers of the new homes. It also reduces the incentives to build new homes which is exactly what we don't need in this country as there is a housing shortage. I completely reject this policy	Comment Noted. The Council's policy takes a balanced and evidence-based approach to ensuring the homes that are built meet local needs whilst maintaining overall deliverability, and is informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. This Whole Plan Viability Assessment incorporates housing mix assumptions and demonstrates that a significant number of development typologies would be viable at a 45% threshold, which is the threshold required under the Council's Fast Track Route, such that there can be overall confidence in the policy being deliverable for a significant proportion of developments. Further justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.	
133	Mr Richard Arko-Adjei [See also Row 100, 165 and 183]	LP24	N	N	N	Positively prepared, Justified, Effective	The proposed 5% cap on single-person/studio units within developments of 10 or more units appears excessively restrictive. This policy doesn't adequately consider the inherent challenges of increasing housing supply in London. Furthermore, given the high prevalence of single-person households in urban areas, particularly in London, this limit seems disproportionate. I would amend the requirement to a maximum of 10% of the dwelling mix for units of 10 to 20. At this level, larger developers would not be interested in the plot. However, beyond 20 units you can apply a sliding scale towards the 5%.	I would amend the requirement to a maximum of 10% of the dwelling mix for units of 10 to 20. At this level, larger developers would not be interested in the plot. However, beyond 20 units you can apply a sliding scale towards the 5%.	Comment Noted. The 5% 'cap' on studio dwellings is considered to be a justified and effective measure to ensure that new homes contribute to supporting the creation of stable local neighbourhoods and cohesive communities. The Housing Needs Assessment projects a very small need for one-bed properties in the Borough. However, the policy has been deliberately drafted to offer flexibility where justified by evidence. Developments proposing a higher level of studio dwellings would be capable of exceptional justification based on evidence. Further justification to the policy approach is set out in the Housing Background Paper
134	Mr Peter Carpenter [See also Row 101, 152, 184 and 203]	LP24	Y	N	Y	Justified, Effective	The minimum proportions of 3 and 4 bedroom intermediate homes are too small. There should be a minimum of 10% for 3 bedroom and 5% for 4 bedroom. While I appreciate the difficulty of providing 3 and 4 bedroom intermediate homes, failing to provide a minimum number will result in an imbalance in housing provision. 10% minimum for 3 bedroom, 5% minimum for 4 bedroom.	10% minimum for 3 bedroom, 5% minimum for 4 bedroom.	Comment Noted. As identified in the Housing Background Paper, and supporting text, there are practical difficulties in delivering 3 or 4 bed intermediate homes relating to income caps and wider eligibility. Consequently the Council considers it appropriate to restrict the proportion of 3 or 4 bed intermediate homes targeted in the policy to ensure the policy is capable of being applied practically. Nevertheless, Policy LP24 has been deliberately designed to offer flexibility where justified, and higher levels of 3 or 4 bed intermediate homes would be capable of such justification through the policy.
135	Mr Charles Glover-Short obo Southern Housing	LP24	Y	Y	Y		We support the general approach to this policy. We also welcome the flexibility afforded by the supporting text at paragraph 17.26 and the reference to "current evidence". This should allow flexibility where there is a specific local need and/or as need changes during the course of the plan period. We also welcome the reference to the reports of the Office for National Statistics as a source of suitable evidence, as this is an accessible source of information and leaves less ambiguity regarding the suitability of evidence.		Support Noted.

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	[See also Row 104, 166, 185, 194 and 201]								
136	Raffaele Sava [See also Row 9, 109, 153, 167, 186 and 195]	LP24					I support the policy's focus on increasing family-sized homes and providing a balanced mix of housing types. However, I encourage the Council to: <ul style="list-style-type: none"> • Set specific targets for 3+ bedroom homes in new developments. • Ensure housing developments cater to multigenerational households, given the rising demand. 	<ul style="list-style-type: none"> • Set specific targets for 3+ bedroom homes in new developments. • Ensure housing developments cater to multigenerational households, given the rising demand. 	Support Noted. The indicative dwelling mix ranges in Policy LP24 include an appropriate range for 3+ bedroom homes as a proportion of the overall development. Whilst the policy does not specifically reference multigenerational households, there are a number of references to the importance of delivering mixed and balanced communities throughout the Local Plan, including Part A2 to Policy LP24.
137	Andrew Catto obo the Putney Society [See also Row 26, 110, 154, 168, 187 and 196]	LP24					Policy LP24 - Housing Mix should be clear and specific. 'contributes to borough wide indicative proportions' cannot be measured. Any planning KC can show that even an 8 bedroom mansion 'contributes ..' Why if family housing is needed (as you say elsewhere) do these figures require 2 out of 3 homes as small flats?		<p>Comment Noted. The phrase 'borough-level indicative proportions' is followed by the words 'detailed below' and relates to Table 17.1. This is considered to be sufficiently clear to be effective.</p> <p>As set out in the Housing Background Paper, the borough-level indicative proportions have been informed by a range of evidence, including demographic modelling contained within the Housing Needs Assessment, the composition of the Council's Housing Waiting Lists and wider market signals and considerations. As a result, whilst family dwellings are the priority in the Borough, the proportion of one-beds allowed for within these indicative proportions has been retained at a relatively high level to ensure the policy remains effective and justified. The Council does not consider it to be effective or justified to set an indicative range which severely restricts one-bed properties given the reasonably high need for one-bed properties indicated by the Council's Housing Waiting Lists and the need to balance the types of developments that make up the Council's housing supply (including a large proportion of flatted developments) and the need to maximise the potential of developable land within the Borough in the context of the Borough's housing requirement, which will together support a need to target a higher proportion of one-bed dwellings than indicated by demographic modelling alone. Further justification on the borough-level indicative proportions is set out in the Housing Background Paper.</p>
138	Maurice Mcleod (Wandsworth Council) [See also Row 113, 155, 169, 188 and 202]	LP24 - General Support	Y	Y	Y		I support this policy		Support Noted.

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139	Leonie Charmes [See also Row 115, 156, 170, 189 and 197]	LP24	N	N	N	Positively prepared; justified; effective; consistent with national policy	<p>Not Positively Prepared - Instead of encouraging housing delivery, this policy restricts what can be built, making development harder and reducing overall supply. A positively prepared plan should focus on enabling housing construction, not micro-managing unit sizes based on arbitrary quotas.</p> <p>Not Justified - There is no evidence that a rigid dwelling mix improves affordability or meets demand effectively. The 5% cap on studios, in particular, hurts affordability by limiting smaller, lower-cost units. If people want studios, why block them? This is social engineering, not sound policy.</p> <p>Not Effective - This policy ensures fewer homes get built. The more restrictions placed on developers, the harder it becomes to deliver housing at scale. Overly prescriptive mix requirements do not reflect actual demand and make projects financially unviable. A policy that reduces supply cannot be effective in tackling housing affordability.</p> <p>Not Consistent with National Policy - The National Planning Policy Framework (NPPF) requires local plans to be deliverable and responsive to market conditions. LP24 fails both tests. It imposes arbitrary dwelling size quotas, restricting developers from responding to actual housing needs. National policy prioritizes increasing supply - this does the opposite.</p> <p>Scrap the Fixed Dwelling Mix Requirements - Let developers respond to demand. The housing market is not static, and restricting what can be built leads to inefficiencies.</p> <p>Remove the 5% Cap on Studios - Studios provide an affordable option for young professionals and key workers. Artificially limiting them is counterproductive. Drop the "Over-Concentration" Rule - There is no economic justification for this. If an area has a high demand for a specific housing type, developers should be able to meet it. Prioritize Supply Over Central Planning - If Wandsworth actually wants more housing, it needs to reduce restrictions, not increase them. The best way to create affordability is to let people build.</p>	<p>Scrap the Fixed Dwelling Mix Requirements -Let developers respond to demand. The housing market is not static, and restricting what can be built leads to inefficiencies. Remove the 5% Cap on Studios -Studios provide an affordable option for young professionals and key workers. Artificially limiting them is counterproductive.</p> <p>Drop the "Over-Concentration" Rule -There is no economic justification for this. If an area has a high demand for a specific housing type, developers should be able to meet it. Prioritize Supply Over Central Planning -If Wandsworth actually wants more housing, it needs to reduce restrictions, not increase them. The best way to create affordability is to let people build.</p>	<p>The Council's policy takes a balanced and evidence-based approach to ensuring the homes that are built meet local needs whilst maintaining overall deliverability and is informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. This Whole Plan Viability Assessment incorporates housing mix assumptions and demonstrates that a significant number of development typologies would be viable at a 45% threshold, which is the threshold required under the Council's Fast Track Route, such that there can be overall confidence in the policy being deliverable for a significant proportion of developments. Further justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p> <p>The provision within the policy which avoids over-concentration is considered a sound planning principle to deliver and maintain mixed and balanced communities. Neighbourhoods characterised by a single size of dwelling fail to cater for a diverse need and undermine this sound planning principle.</p> <p>The 5% 'cap' on studio dwellings is considered to be a justified and effective measure to ensure that new homes contribute to supporting the creation of stable local neighbourhoods and cohesive communities. The Housing Needs Assessment projects a very small need for one-bed properties in the Borough.</p> <p>However, the policy has been deliberately drafted to offer flexibility where justified by evidence. Developments proposing a higher level of studio dwellings would be capable of exceptional justification based on evidence. Further justification to the policy approach is set out in the Housing Background Paper.</p>
140	Jenny Scott-Thompson [See also Row 116]	LP24		Y	Y		2. Thank you for continuing to keep a mix of housing types for good community.		Support Noted.
141	Jamie Banks [See also Row 117, 171 and 190]	LP24	N	N	N	Positively prepared, Justified, Effective, Consistent with national policy	Struggling to work out if you are morons, or purposely introducing aristocratic anti-housing policies under stealth. I would almost have more respect if you were truly self interested and representing the views of your richest inhabitants, bourgeoisie land owners, but all but preventing any new development. However I sense you are actually well intentioned, and just incredibly dim. I wonder if any of you have taken even a first year economics course?	Struggling to work out if you are morons, or purposely introducing aristocratic anti-housing policies under stealth. I would almost have more respect if you were truly self interested and representing the views of your richest inhabitants, bourgeoisie land owners, but all but preventing any new development. However I sense you are actually well intentioned, and just incredibly dim. I wonder if any of you have taken even a first year economics course?	Comment Noted. The justification for Policy LP24 is set out in the Housing Background Paper.

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142	Dr Vanessa Yardley [See also Row 173]	LP24	Y	Y	Y		2. Wondering if HMOs (house in multiple occupation) should be mentioned, namely these are not supported by WBC?		Comment Noted. As set out in the supporting text, the policy applies to a number of types of residential developments falling within Use Clas C3 and C4 Other policies within the Local Plan address wider requirements concerning HMOs.
143	John Turner obo Ballymore Group [See also Row 19, 49, 159, 174 and 177]	LP24					<p>Policy LP24 Housing Mix</p> <p>Ballymore supports the Council's desire to ensure residential developments deliver a range of housing types and sizes to secure quality, mixed and balanced communities, however, we do raise concerns regarding the increasing requirements in terms of unit mix set out within draft policy LP24 notably in relation to the larger sized units for market accommodation. It is considered that the Council should prioritise the delivery of affordable family housing (where there is the most acute need) and allow greater flexibility across the market homes to support the delivery of these affordable family homes.</p> <p>Draft policy H4 seeks to secure a maximum of 20-30% of all new market homes as 1 bedroom essentially requiring additional larger homes to be provided. As set out above, we have concerns that this will place increased financial pressure on the delivery of schemes and, particularly when balanced with affordable housing delivery, could have significant impacts on the viability and delivery of schemes (particularly large strategic sites).</p> <p>These smaller units often help to improve the viability and deliverability of a scheme, thereby allowing the scheme to support a higher proportion of family housing across the affordable tenure. We would support the Council in resisting these smaller units within the affordable element of a scheme, however, contend that 1 bedroom and studio homes should be allowed as an element of the overall private housing offer of a scheme to support the viable delivery of sites. Further, we don't consider the 5% limit on studio units to be supported by appropriate evidence and we query whether this has been robustly viability tested as part of the Local Plan process, if not it should be.</p> <p>As currently drafted, we have significant concerns that draft policy LP24 would jeopardise the delivery of the Council's other housing ambitions and policy requirements (such as affordable housing), and therefore suggest the above revisions be made to allow greater flexibility across the market tenure.</p>	<p>It is considered that the Council should prioritise the delivery of affordable family housing (where there is the most acute need) and allow greater flexibility across the market homes to support the delivery of these affordable family homes.</p> <p>These smaller units often help to improve the viability and deliverability of a scheme, thereby allowing the scheme to support a higher proportion of family housing across the affordable tenure. We would support the Council in resisting these smaller units within the affordable element of a scheme, however, contend that 1 bedroom and studio homes should be allowed as an element of the overall private housing offer of a scheme to support the viable delivery of sites. Further, we don't consider the 5% limit on studio units to be supported by appropriate evidence and we query whether this has been robustly viability tested as part of the Local Plan process, if not it should be.</p> <p>As currently drafted, we have significant concerns that draft policy LP24 would jeopardise the delivery of the Council's other housing ambitions and policy requirements (such as affordable housing), and therefore suggest the above revisions be made to allow greater flexibility across the market tenure.</p>	<p>Comment Noted.</p> <p>As set out in the Housing Background Paper, the borough-level indicative proportions in the policy strike a balance between demographically modelled need and other considerations, including market considerations. The Council's Housing Needs Assessment identifies a large need for family market dwellings and a relatively small need for one-bed properties. Whilst family dwellings are the priority in the Borough, the proportion of one-beds allowed for within these indicative proportions has been retained at a relatively high level to ensure the policy remains effective and justified. The Council considers it to be important that its housing mix policy sets an effective strategy for meeting identified local housing needs, which includes the needs for different sizes of home, in line with national policy. The Council does not consider it to be effective or justified to reduce the proportion of family-sized homes, or increase the proportion of one-beds, as this would risk the policy ceasing to be effective in meeting local needs as suggested by the Housing Needs Assessment. A range of housing mix requirements have been tested as part of the Whole Plan Viability Assessment which, when considered across the Council's policy proposals as a whole, suggests a majority of likely site typologies remain viable. Notwithstanding this fact, there remains provision for significant flexibility in Part E of Policy LP24 which clearly states that the financial viability of a scheme can be taken into account when justifying the dwelling mix on a site by site basis. Further justification for Policy LP24 can be found in the Housing Background Paper.</p> <p>The 5% 'cap' on studio dwellings is considered to be a justified and effective measure to ensure that new homes contribute to supporting the creation of stable local neighbourhoods and cohesive communities. However, the policy has been deliberately drafted to offer flexibility where justified by evidence. Developments proposing a higher level of studio dwellings would be capable of exceptional justification based on evidence. Further justification to the policy approach is set out in the Housing Background Paper.</p>

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144	Joseph Hickling obo George Potter House of Battersea [See also Row 42 and 200]	LP24		N		Positively prepared; justified; effective; consistent with national policy	<p>Policy LP31: Specialist Housing for Vulnerable People and for Older People</p> <p>Housing Mix and Dwelling Sizes</p> <p>2.4 Draft Policy LP31 and its supporting text makes no caveats which allows for Specialist Housing for Older Person's housing to deviate from the dwelling size mix detailed in Draft Policy LP24 (Housing Mix). It is notable that the dwelling size mix set out in Draft Policy P24 has been informed by the Wandsworth Housing Needs Assessment 2024. However, the document nor Draft Policy LP24 specifically identifies future need for dwelling size mix for Specialist Housing for Older People tenures within the borough.</p> <p>2.5 This approach is inconsistent with NPPF Paragraph 63 which states that the size of housing needed for older people needs to be established, as follows: "Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to)...older people (including those who require retirement housing, housing with-care and care homes)...".</p> <p>2.6 Further to this, the London Plan's Policy H13 (Specialist older persons housing) supporting text at paragraph 4.13.11 states that following: <i>"the tenure split requirements for specialist older persons housing may differ to those set out in Policy H6 Affordable housing tenure. Where they do, they should be clearly set out in local Development Plan Documents or supplementary guidance."</i></p> <p>2.7 The dwelling size/tenure split set out in Draft Policy LP24 proposes to reduce the quantum of smaller homes, and increase the size of larger homes. This is not representative of the general market need for Specialist Housing for Older People where occupiers seek to downsize when living in Retirement and Assisted Living housing, and in the instance of C2 (Care Homes and Extra Care), occupiers most commonly live in 1 and 2 bedroom homes. To evidence this, the limited reference there is to dwelling size projections in the Wandsworth Housing Needs Assessment 2024 confirms a need for 4,142 household additional single and couple household over the plan period up to 2038. The need for 'other' households is only stated as a 823 unit increase.</p> <p>2.8 Therefore, from a dwelling size perspective, as currently proposed, Draft Policy LP31 is inconsistent with the NPPF and ineffective.</p>	<p>Comment Noted.</p> <p>Paragraph 17.28 acknowledges that flexibility will be applied for developments providing for retirement, sheltered or extra care housing, whilst Paragraph 17.29 acknowledges that dwelling mix requirements within Policy LP24 do not apply to developments that provide housing for specific community needs. This could conceivably include some types of specialist housing. As a result, the Council considers the policy to provide flexibility for specialist forms of accommodation where it may not be appropriate to directly apply the indicative proportions within Policy LP24. Whilst the Council could conceivably remove this supporting text and instead set distinct indicative proportions for specialist housing within the policy, the Council considers this would be a less effective approach given the need to account for a wide diversity of types and need of specialist housing, which may themselves have very different housing mix needs, and the reduced flexibility that setting such proportions would result in.</p> <p>The Council has recommended a potential modification for the Inspector to consider which would add an additional consideration to Part E of the policy that would recognise that specialist forms of accommodation may have a different housing mix requirement to that set out in Policy LP24 and to create a mechanism through which the borough-level indicative proportions set out within the policy would be disapplied in favour of an alternative evidenced mix in such a case.</p>	

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LP28 – Purpose-Built Student Accommodation									
145	Ms Janine Streuli [See also Row 93 and 130]	LP28	Y	Y	Y		It is pleasing that PBSA is now required to meet the needs of local HEPs. This has previously not been the case and, sadly, urbanest Battersea let all its affordable units to an out-of-borough provider, leaving those in the borough short-changed. It is important that even PBSA has a high number of affordable units for students studying at small and specialist HEPs in the borough.		Support Noted.
146	Zelie Batchelor obo Watkin Jones [See also Row 38, 43, 123, 162 and 178]	LP28		N		Positively prepared; justified; effective; consistent with national policy	<p>LP28: Purpose Built Student Accommodation</p> <p>The proposed updated wording of Policy LP28 is as follows:</p> <div style="border: 1px solid black; padding: 5px;"> <p>LP28 Purpose Built Student Accommodation</p> <p>A. Proposals for Purpose-Built Student Accommodation will be supported where the development:</p> <ol style="list-style-type: none"> 1. Is proposed on a site which is not suitable for conventional housing; 2. Includes a financial contribution towards affordable housing equivalent to Local Plan Policy LP23 (Affordable Housing); 3. Includes affordable student housing provision as set out in London Plan Policy H15; 4. Is accompanied by a site management and maintenance plan which demonstrates that the accommodation will be managed and maintained over its lifetime so as to ensure an acceptable level of amenity and access to facilities for its occupiers, and would not give rise to unacceptable impacts on the amenities of existing residents in the neighbourhood, including outside of term times. 5. Has access to sufficient levels of public transport, and to shops, services and leisure facilities appropriate to the student population; 6. Can demonstrate a priority for meeting the accommodation needs firstly of recognised HEPs in Wandsworth, and then in neighbouring authorities or within a practical travelling distance from Wandsworth; 7. Would not result in an over-concentration of single-person accommodation at the neighbourhood level which may be detrimental to the balance and mix of uses in the area or place undue pressure on local infrastructure; 8. Can make facilities provided for student residents available to the wider community, particularly where there is an acknowledged shortfall in such provision within the neighbourhood; 9. Provides a high-quality living environment, including the provision of adequate functional living spaces and layouts, well-integrated internal and external communal areas, and a high level of amenity (providing good levels of daylight and sunlight, and natural ventilation); and 10. Provides at least 10% of student rooms which are readily adaptable for occupation by wheelchair users. <p>B. The loss of existing student accommodation will be permitted when it is demonstrated that the facility no longer caters for current or future needs and the floorspace is replaced by another form of residential accommodation that meets other Local Plan housing requirements. Proposals for a change of use of existing student accommodation which result in the net loss of student residential floorspace will only be permitted when:</p> <ol style="list-style-type: none"> 1. The loss of student housing would be replaced by another priority housing need; or 2. The loss of student accommodation would be solely at ground floor level; and <p>a. The development would replace the ground floor student accommodation with active ground floor uses; and b. The proposed ground floor uses would pass the sequential test for main town centre uses in accordance with Policy LP43 (Out of Centre Development).</p> </div> <p>The proposed amendments to Policy LP28 are contrary to the London Plan and likely to result in developments being financially unviable and undeliverable, which will further suppress the ability for the Council to meet its objectively assessed local housing need,</p>	<p>Proposed wording of Policy LP28</p> <p>Our recommended amendments to Policy LP28 are set out below in red.</p> <div style="border: 1px solid black; padding: 5px;"> <p>LP28 Purpose Built Student Accommodation</p> <p>A. Proposals for Purpose-Built Student Accommodation will be supported where the development:</p> <ol style="list-style-type: none"> 1. is proposed on a site which is not suitable for conventional housing; 2. Includes a financial contribution towards affordable housing equivalent to Local Plan Policy LP23 (Affordable Housing) or affordable student housing provision as set out in London Plan Policy H15; 3. Includes affordable student housing provision as set out in London Plan Policy H15; 4. is accompanied by a site management and maintenance plan which demonstrates that the accommodation will be managed and maintained over its lifetime so as to ensure an acceptable level of amenity and access to facilities for its occupiers, and would not give rise to unacceptable impacts on the amenities of existing residents in the neighbourhood, including outside of term times. 5. Has access to sufficient levels of public transport, and to shops, services and leisure facilities appropriate to the student population; 6. Can demonstrate a priority for meeting the accommodation needs firstly of recognised HEPs in Wandsworth, and then in neighbouring authorities or within a practical travelling distance from Wandsworth; 7. Would not result in an over-concentration of single-person accommodation at the neighbourhood level which may be detrimental to the balance and mix of uses in the area or place undue pressure on local infrastructure; 8. Where possible, can make facilities provided for student residents available to the wider community as part of mixed use developments, provide community uses, particularly where there is an acknowledged shortfall in such provision within the neighbourhood; 9. Provides a high-quality living environment, including the provision of adequate functional living spaces and layouts, well-integrated internal and external communal areas, and a high level of amenity (providing good levels of daylight and sunlight, and natural ventilation); and 10. Provides at least 10% of student rooms which are readily adaptable for occupation by wheelchair users. <p>B. The loss of existing student accommodation will be permitted when it is demonstrated that the facility no longer caters for current or future needs and the floorspace is replaced by another form of residential accommodation that meets other Local Plan housing requirements. Proposals for a change of use of existing student accommodation which result in the net loss of student residential floorspace will only be permitted when:</p> <ol style="list-style-type: none"> 1. The loss of student housing would be replaced by another priority housing need; or 2. The loss of student accommodation would be solely at ground floor level; and <p>a. The development would replace the ground floor student accommodation with active ground floor uses; and b. The proposed ground floor uses would pass the sequential test for main town centre uses in accordance with Policy LP43 (Out of Centre Development).</p> <p>Our recommended amendments to the supporting text of Policy LP28 are set out below in red.</p> <div style="border: 1px solid black; padding: 5px;"> <p>17.46: Proposals for student accommodation shall should use reasonable endeavours to be either be operated directly by a HEP or the majority of the bedrooms in the development shall should use reasonable endeavours to have an agreement in place from initial occupation with one or more HEPs, to provide housing for its students, and to commit to having such an agreement for as long as the development is used for student accommodation in accordance with London Plan Policy H15.</p> <p>17.48: Where Purpose-Built Student Accommodation is considered acceptable in accordance with Policy LP28, it should be directed to well-connected locations with good level of access to public transport, including those supported by good walking and cycling infrastructure. It is also important that Purpose-Built Student Accommodation is sited so student residents have access to a wide range of services and facilities within a 20+4-minute walking distance. Purpose-Built Student Accommodation will also be supported where the development is capable of having good access to public transport and facilities as a result of proposed transport improvements, including through a package of measures that the proposal would deliver.</p> </div> </div> <p>The Council's policy approach sets out that student housing schemes will be expected to contribute to both conventional affordable housing and affordable student housing (in line with the London Plan) which has been tested as part of the Whole Plan Viability Assessment. The Council has recommended a potential modification to Paragraph 17.43 for the Inspector to consider which would further clarify how the Council expects developers to calculate and prioritise their contributions towards both types of affordable housing. Further justification to the policy approach is set out in the Housing Background Paper.</p> <p>The policy has been prepared to encourage student housing developments to prioritise the needs of local HEPs where possible. The policy also sets out the need to provide a proportion of rooms as affordable student accommodation, in line with the London Plan.</p> <p>Paragraph 17.46 requires the operation of student accommodation to be in accordance with London Plan Policy H15.</p> <p>Accessibility requirements are set out in London Plan Policy H15 and do not require repeating in the Local Plan policy. Nevertheless, the policy contains a clause which requires prioritisation of meeting the needs of local HEPs and then a sequential approach to prioritising the needs of those in neighbouring authorities or within a practical travelling distance. The Council considers this clause to provide a meaningful mechanism for ensuring PBSA schemes prioritise locations which are accessible to the HEP they relate to.</p>	Comment Noted.

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						<p>including the needs of specialist housing such as PBSA.</p> <p>Analysis of the wording of Policy LP28 is set out below.</p> <p><u>A.1. Proposals for Purpose-Built Student Accommodation will be supported where the development is proposed on a site which is not suitable for conventional housing. Part 1 of the Policy states that PBSA will be supported on sites that are "not suitable for conventional housing".</u></p> <p>Greater clarity is requested as to what makes a site not suitable for conventional housing, but suitable for student housing. Indeed, both conventional housing and student housing are residential tenures in which development plan policy requires such uses to provide a high standard of living accommodation and wider environment. We therefore would not expect any sites to be suitable for one residential tenure, but not the other. The supporting text of Policy LP28 (Paragraph 17.45) implies that the only sites that are not suitable for conventional housing are those on existing Higher Education Provider ("HEP") campuses. This, in effect, would suggest that PBSA would only likely be acceptable on HEP campuses (i.e. Roehampton Main Campus and St George's University). However, this pays no regard to the fact that HEP's have limited funds or appetite to develop sites for accommodation and typically rely on specialist PBSA developers to take development risk, preferring instead to enter into nominations agreements. It also implies that student housing will be met wholly on two campuses which is an unrealistic assumption for the Borough in a strategic London context. Furthermore, despite parts of the Borough being well connected by public transport to a number of HEP's in London (which makes such sites suitable for PBSA in principle in accordance with Policy H15) the supporting text would suggest that the Council would only support PBSA on land owned by the two HEPs within the Borough. This approach is contrary to Policy H15 of the London Plan which intentionally does not set borough-level targets to achieve the regional target of 3,500 student beds per year and is purposefully flexible to allow the location of the need to vary over the plan period, having regard to changes in higher education providers' estate and expansion plans, availability of appropriate sites, and change in Government policy that affect their growth and funding. Paragraph 17.42 of the supporting text of Policy LP28 seeks to justify the safeguarding of land for conventional housing on the basis of the need to support the delivery of social rented housing. However, it does not necessarily follow that conventional housing will deliver more social rented housing than a PBSA scheme could, particularly as the PBSA LPG (2024) acknowledges that boroughs can take a flexible approach to affordable housing on PBSA schemes and can prioritise delivery of conventional affordable housing over affordable student housing. As such, there is already existing guidance in place that allows boroughs to seek delivery of conventional affordable housing (including social rented) alongside PBSA. Indeed, this is the case in respect of the Client's live planning appeal in the Borough on Battersea Park Road (LPA ref: 2022/1835) in which the scheme proposes to deliver 762 PBSA bedrooms, alongside 55 conventional affordable dwellings. The site has an extant planning permission for 307 residential dwellings including 57 intermediate affordable dwellings, and 20 affordable rented dwellings. The appeal scheme, whilst a PBSA led scheme, would contribute more housing</p>			

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						<p>17 towards the Council's housing land supply than the extant planning permission (502 equivalent dwellings compared to 307 dwellings) and would deliver 27 social rented dwellings, whereas the extant permission does not provide any social rented dwellings. This is an example which demonstrates that rather than be perceived as a blocker of conventional affordable housing, PBSA can, in fact, be an enabler of affordable housing and we encourage that the Local Plan recognises this, as the PBSA LPG does. The challenge in building affordable housing has not been greater, and in November 2024, Inside Housing1 reported that affordable housing starts in 2023-2024 fell 39% on the previous year, with an 88% decrease in London. In London, there were just 3,156 starts for the 2023-24 financial year, compared with 26,386 during the previous year, the data from the Ministry of Housing, Communities and Local Government (MHCLG) showed. Therefore, with the need for affordable housing only increasing but evidence pointing to a slow down in supply, it is essential that decision-makers are being flexible in their approach to maximising affordable housing delivery. This is also recognised in by Paragraph 71 of the NPPF which states that "Mixed tenure sites can provide a range of benefits, including creating diverse communities and supporting timely build out rates, and local planning authorities should support their development through their policies and decisions (although this should not preclude schemes that are mainly, or entirely, for Social Rent or other affordable housing tenures from being supported). Mixed tenure sites can include a mixture of ownership and rental tenures, including Social Rent, other rented affordable housing and build to rent, as well as housing designed for specific groups such as older people's housing and student accommodation, and plots sold for custom or self-build." In essence, there is no justification to implement a policy that favours conventional housing over PBSA. Indeed, PBSA contributes towards the delivery of housing and in the absence of sufficient PBSA, students are left with the alternative of occupying Houses in Multiple Occupation (HMOs) which reduces the stock (and affordability) available for single family households. This also applies to future housing stock being built, which will have less demand from student residents if there is an available supply of PBSA. Having established that the delivery of PBSA is a valid contributor toward meeting housing needs and can assist in freeing up larger homes in the borough and making them available for single family households, it is clear that there are significant benefits attached to the delivery of PBSA, and therefore their delivery should not be restricted to limited sites. We therefore strongly recommend that Part A1 of Policy LP28 is omitted in order for the policy as a whole to be positively prepared, justified, effective and consistent with national policy.</p> <p>[See also Row 43 for relevant comments relating to the viability assessment] <u>A.2. Proposals for Purpose-Built Student Accommodation will be supported where the development includes a financial contribution towards affordable housing equivalent to Local Plan Policy LP23 (Affordable Housing):</u></p> <p>Whilst there is no objection in principle for the mix of affordable housing to be a combination of affordable PBSA and conventional housing (if the site can accommodate both) as this is supported by the PBSA LPG, the requirement for a financial contribution towards affordable housing equivalent to the policy target in LP23 to be provided alongside affordable student at the policy target for affordable student housing is wholly</p>			

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						<p>unreasonable and will significantly impact the viability and therefore the delivery of PBSA development. Indeed, taking Policy H15 of the London Plan and Policy LP23 of the Local Plan Partial Review together would effectively mean that a PBSA development would be expected to deliver 35% (or 50%) affordable student accommodation alongside a financial contribution equivalent to at least 45% conventional affordable housing. This would clearly make such 1 'Collapse in London affordable housing starts fuels 39% national decrease' article, published by Inside Housing on 25 November 2024. 18 development unviable undermining PBSA delivery against the annual need of 3,500 bed spaces per year as well as affordable housing delivery (whether that be affordable student housing or conventional affordable housing).</p> <p><u>A.8. Proposals for Purpose-Built Student Accommodation will be supported where the development can make facilities provided for student residents available to the wider community, particularly where there is an acknowledged shortfall in such provision within the neighbourhood.</u></p> <p>As part of a mixed-use development, there is no reason why PBSA-led developments cannot provide community uses. However, it is not practical to allow community access to ancillary student facilities given the obvious safeguarding requirements for students. As such, the wording of this policy should be altered to make it clear that this relates to separate community facilities within a wider development (as part of a mixed-use development), rather than ancillary student communal amenity space.</p> <p><u>Supporting Text Paragraph 17.46: Proposals for student accommodation must either be operated directly by a HEP or the majority of the bedrooms in the development must have an agreement in place from initial occupation with one or more HEPs, to provide housing for its students, and to commit to having such an agreement for as long as the development is used for student accommodation in accordance with London Plan Policy H15.</u></p> <p>The request within this supporting text does not align with the recently published Mayor's 'Purpose-Built Student Accommodation' LPG (2024) which states that developers should use reasonable endeavours to secure nomination agreements, rather than strictly requiring it, to allow for greater flexibility. Therefore, this paragraph should be amended to allow for greater flexibility and to accord with London Plan guidance.</p> <p>Supporting Text Paragraph 17.48: Where Purpose-Built Student Accommodation is considered acceptable in accordance with Policy LP28, it should be directed to well-connected locations with good level of access to public transport, including those supported by good walking and cycling infrastructure. It is also important that Purpose-Built Student Accommodation is sited so student residents have access to a wide range of services and facilities within a 15-minute walking distance. Purpose-Built Student Accommodation will also be supported where the development is capable of having good access to public transport and facilities as a result of proposed transport improvements, including through a package of measures that the proposal would deliver. Supporting Text</p>			

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							Paragraph 17.48 would benefit from the inclusion of a minimum Public Transport Accessibility Levels ("PTAL") rating to clearly identify well-connected locations suitable for PBSA. This would align with the Mayor's 'Purpose Built Student Accommodation' LPG (2024) which states that areas likely to be suitable for PBSA will include areas of PTAL 5 or 6 and Inner London PTAL 4. On the whole, we consider that the wording of the Policy LP28 as set out in the Local Plan Partial Review is unsound. It is neither positively prepared, effective, justified or consistent with national planning policy. Our suggested amendments to Policy LP28 to make it sound are set out below.		
147	Alice You obo. VSM (NCGM) Ltd. [See also Rows 37, 44, 122, 161, and 176]	LP28		N		Positively prepared, Justified, Effective, Consistent with national policy	<p>DRAFT POLICY LP28- PURPOSE BUILT STUDENT ACCOMMODATION Draft Policy Draft LP28 – Purpose Built Student Accommodation (PBSA)</p> <p>London Plan conformity London Plan (2021) Policy H15 sets the strategic policy direction for PBSA in London. Since its adoption, a number of policies have come forward at borough level across London, both adopted and emerging, that follow the principles set by H15, but also that make further local requirements or distinctions (which it is understood have been references by LB Wandsworth policy team in their consideration of the emerging Draft Policy LP28). The GLA have also adopted a London Plan Guidance ('LPG') document on Purpose Built Student Accommodation (October 2024), that seeks to provide further guidance and clarity on a number of matters that are being played out at borough levels in applications, particularly in relation to affordable provision and approach to nominations agreements.</p> <p>As noted, the London Plan review is expected to progress shortly and is expected to provide further updated strategic guidance to reflect the updates and application in practice of Policy H15 since its adoption. To make significant changes to Policy LP28, in particular its affordable approach, ahead of this process is considered to be inefficient and such policy updates should await strategic direction at Mayoral level to ensure that they align. It is also considered necessary to best ensure LB Wandsworth's duty-to-co-operate is met in preparing their Local Plan.</p> <p>Notwithstanding the above, draft policy at Part (A)(1) specifies that student accommodation will be supported on sites that are not suitable for conventional housing. Draft supporting text to this policy, paragraph 17.44, does allow for some flexibility however for co-location of the two uses, noting "In exceptional circumstances where a student housing development is proposed on a site which could accommodate some conventional housing, the equivalent level of affordable housing as required by Policy LP23 should be provided as a separate block on the site as part of the scheme and phased accordingly". This approach is supported and is considered to align in principle with the GLA's Purpose Built Student Accommodation London Planning Guidance ('LPG') (October 2024). This LPG however goes further and states at paragraph 2.5.3, that such an approach (of co-locating PBSA and C3 accommodation) may not only be acceptable, but "even desirable as part of pursuing mixed and inclusive neighbourhood objectives". Indeed, providing student accommodation on sites alongside C3 and other uses also</p>	<p>Suggested amendments to policy The following suggestions are made:</p> <ul style="list-style-type: none"> • Updates to Policy LP28 await strategic direction from the forthcoming London Plan Review • Part (A)(1) of draft Policy LP28 is amended to allow for greater flexibility to co-locate PBSA and conventional C3 housing where appropriate, to align with the Mayoral LPG and acknowledge the planning benefits that can be unlocked through provision of PBSA on mixed use regeneration sites. • Part A(2) and (3) and relevant supporting text of the draft Policy LP28 are reviewed in the context of the strategic aims of the policy to ensure effectiveness, and in relation to the practical applications and outcomes of policies from other boroughs, such as Southwark, with a suggest approach being to make clear the prioritisation of affordable provision, and two options rather than a doubling up of affordable provision. Suggested wording for the policy is proposed as noting either 35% on-site affordable student accommodation is provided, or C3 affordable provision accommodation with the latter being the priority. Further clarification then on if there is a sequential approach to prioritisation, this can also be provided 	<p>Comment Noted.</p> <p>The purpose of Part A1 to the policy is to ensure there is balance between the need to deliver student housing whilst ensuring land is appropriately safeguarded for conventional housing, including conventional affordable housing, for which a high level of need is demonstrated through the Housing Needs Assessment. The Council has recommended a potential modification for the Inspector's consideration which would further clarify Part A1 to list specific categories of site where student housing will be resisted, with particular reference to sites which are allocated or identified for conventional housing. A further modification is recommended to the supporting text which would elaborate on how these sites would be defined and identified. Further justification to the policy approach is set out in the Housing Background Paper.</p> <p>The Council's policy approach sets out that student housing schemes will be expected to contribute to both conventional affordable housing and affordable student housing (in line with the London Plan) which has been tested as part of the Whole Plan Viability Assessment. The Council has recommended a potential modification to Paragraph 17.43 for the Inspector to consider which would further clarify how the Council expects developers to calculate and prioritise their contributions towards both types of affordable housing. Further justification to the policy approach is set out in the Housing Background Paper</p>

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						<p>aligns with London Plan Policy H15(b) that encourages PBSA to be provided as “part of mixed-use regeneration and redevelopment schemes”.</p> <p>It is acknowledged that there is a demonstrable need for conventional housing, particularly affordable. However, it is important that student accommodation need is also provided for and it should be acknowledged that student accommodation does contribute towards housing delivery, as noted at paragraph 2.1.1 of the LPG “London Plan Policy H15 acknowledges the role that PBSA has in meeting housing need, in supporting London’s knowledge economy, and in contributing more generally to regeneration – which are needs established at the London level”. The LPG suggests at paragraphs 2.5.3, 2.5.4 and 2.5.5 that a balance should be achieved when considering the provision of both these uses and that options to co-locate student accommodation with C3 may be “particularly relevant where C3 delivery, is relatively poor, including on sites where previous C3 consents have not been built out”. This approach of encouraging co-locating the two uses is noted explicitly within Box 2 of the LPG as a potential policy approach to help manage issues of concentration and dominance, which is noted is also an aim of draft Policy LP28 at Part 7.</p> <p>Therefore, it is considered that review of draft Policy LP28 should await strategic direction from the imminent London Plan Review. Notwithstanding this, in relation to draft Policy LP28 as currently drafted, further clarification should be provided to Part (A)(1) of draft Policy LP28 and greater flexibility acknowledged in the supporting text at paragraph 17.44, to align with the adopted LPG and allow for flexibility to co-locate student accommodation on sites with conventional C3 accommodation where this would result in increased delivery against two demonstrable housing needs (PBSA and conventional C3) and on mixed use regeneration sites.</p> <p>NPPF: positively prepared</p> <p>NPPF paragraph 63 notes in relation to establishing housing need that “Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies” and notes that this includes students.</p> <p>Within the London context, the provision of PBSA is cross-boundary in nature. Paragraph 5.64 of the Housing Needs Assessment (December 2024) notes that “the nature of the transport network in London implies that students can study in one borough but live elsewhere”. Therefore, local planning policy should ensure that the provision of accommodation for students is sufficiently shared out between boroughs, taking advantage of the most sustainable locations for student accommodation within each borough across the capital. LB Wandsworth is particularly well located in comparison to some other boroughs, given proximity to central London and good public transport accessibility, further enhanced recently by the Northern Line Extension, providing excellent access and connectivity to the majority of HEIs throughout London.</p>			

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						<p>PBSA is also considered to make important contributions towards student housing need, not least relieving demand to convert conventional housing into student houses in multiple occupation and providing the accommodation where the necessary associated uses and transport connectivity can be ensured, as acknowledged in the Mayoral LPG at Box 1 and paragraph 2.1.1. However, for reasons detailed below, it is considered that Draft Policy LP28 would fail to provide the conditions for local and strategic demand for student accommodation to be met, and therefore the contribution towards London's strategic wider need. The Wandsworth Housing Needs Assessment (December 2024) notes that, of the total 91,000 PBSA bedspaces and 350,000 full-time students across London, "Wandsworth provides around 1% of the total PBSA capacity and contains around 2% of the students" (paragraph 5.64). It goes on to note that the London Plan, Policy H15 considers the need for PBSA, identifying an annual need for 3,500 units of PBSA. The Wandsworth Housing Needs Assessment (2024) goes on to note that, "if Wandsworth was to continue to provide for 2% of all students in London, this would equate to around 70 PBSA per annum" (paragraph 5.66). The London Plan (2021) target is not broken down into borough-level targets, Paragraph 4.15.3 notes that the location of this need will vary over the Plan period. Therefore, it is not considered effective plan-making to assume a continued provision proportionate to the existing contribution that Wandsworth makes towards student accommodation across London, which at 2% is already very low.</p> <p>Given that paragraph 5.65 of the Wandsworth Housing Needs Assessment demonstrates the delivery of only 938 PBSA beds within the borough over a 22 year period (from 2002-2023), the majority of which are to be provided in a single scheme (Palmerston Court in Battersea), it is noted that the 2% provision of annual need, is already not being achieved in any case. In addition, the 2% historic provision fails to recognise the progression of suitability for PBSA schemes within LB Wandsworth as Borough. LB Wandsworth is well located with a large area of the borough being within Zone 1 and with strong public transport connections and areas benefiting from substantial improvements associated with sustainable transport modes, such as the Northern Line Extension. As such, the Borough is suitable for and delivering, a number of large, mixed use regeneration schemes. Such qualities also are considered to make it ideal for contributing towards student accommodation need at a higher level.</p> <p>Furthermore, such an approach risks embedding uneven provision and clusters of student accommodation (undermining the strategic aim of the London Plan (2021) Policy H15 to achieve mixed and inclusive neighbourhoods) across different borough boundaries. It is noted that neighbouring borough, Lambeth, has delivered a significant number of student accommodation beds and has a strong pipeline of delivery. Relying on neighbouring boroughs to deliver student accommodation in line with the London Plan's (2021) identified annual need targets, is not considered to constitute effective joint working on cross-boundary strategic matters, a measure of effectiveness within the policy soundness tests set out in the NPPF. Therefore, it is suggested that the draft Policy wording at A(1) is updated to acknowledge the need for student accommodation and the role that it can play in meeting housing need and contributing more generally to regeneration (see para 2.1.1</p>			

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						<p>of the LPG), and that development proposals that seek to address that need on appropriate sites will be supported.</p> <p>NPPF: justified</p> <p>Part A (3) of the draft policy requires affordable housing provision on student schemes to be provided in line with London Plan Policy H15. Policy H15 requires the maximum level of affordable student accommodation to be provided (via following the Fast Track Route thresholds or via viability testing).</p> <p>Part A (2) of the draft requires a financial contribution towards the affordable housing equivalent to draft Local Plan Policy LP23. The supporting text at draft paragraphs 17.42 and 17.43 notes that the financial contribution towards affordable conventional C3 housing is to be 'prioritised' in proposals for student accommodation. However, the current draft wording of Part A of the policy does not reflect a prioritisation and, in fact, appears to suggest that both on-site affordable student rooms (as per draft policy part A(3)) and an affordable housing financial contribution (as per draft policy part A(2)) will be sought. This approach is considered to be double counting the affordable provision on student schemes and therefore is overly onerous and will restrict development. The Local Plan Viability Assessment dated August 2024, provides rationale for this approach, referencing at paragraph 7.10 "Some boroughs have sought to reduce the impact on affordable housing supply of this 'leakage' of sites from conventional housing by introducing policies that require student housing to provide an element of 'conventional' C3 affordable housing. For example, LB Southwark requires that purpose-built student housing schemes provide 35% conventional C3 affordable housing, with 35% of the remaining student accommodation let at affordable student rents. This policy is applied on a 'subject to viability' basis, in line with its other Local Plan policies relating to affordable housing. Clearly, this is an option that Wandsworth could consider if it anticipates a significant increase in the number of sites being brought forward as purpose-built student accommodation."</p> <p>This reference relates to the direct-let route set out in LB Southwark student accommodation policy (Policy P5), adopted in 2022. The LB Southwark PSBA Policy P5 provides two distinct routes regarding the delivery of student accommodation; fully nominated or fully direct let. Whilst a fully nominated scheme is expected to provide student affordable rents on site, only, where a direct-let scheme is proposed, P5(2) applies. P5(2) notes "When providing direct lets at market rent, provide the maximum amount, with a minimum of 35% as conventional affordable housing by habitable room subject to viability, as per policy P4, as a first priority. In addition to this, 27% of student rooms must be let at a rent that is affordable to students as defined by the Mayor of London." [Turley emphasis]. Since the adoption of this policy, this policy point under P5(2) has been subject to much discussion during the determination of applications and clear approaches on the practical application of it have been established. It is considered that rather than replicate the Southwark policy, LB Wandsworth should consider the implications of the practical application to ensure that the aims of the policy are achieved</p>			

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							<p>and ensure that the policy is effective (as per the NPPF tests). Although the LB Southwark policy P5(2) does note a requirement for both C3 affordable and affordable student rents, the LB Southwark policy clearly sets out a level of prioritisation, through the inclusion of the wording 'as a first priority'-with the minimum of 35% conventional C3 accommodation being the priority and the potential for the affordable student rent rooms to be subject to viability testing. This is also demonstrated in the practical application of the policy- on the most recent direct-let PBSA schemes either approved or receiving resolution to grant in the borough, all have maximised their affordable provision in their viability testing to provide C3 affordable (either on-site or via a payment-in-lieu), with no affordable student rents provided. These schemes are:</p> <ul style="list-style-type: none"> • Chatelain House, 182-202 Walworth Road (ref. 24/AP/0892) - on-site C3 affordable homes • 31 Amelia Street (ref. 22/AP/0850)- payment-in-lieu towards off-site affordable C3 • Devonshire Place - 747-759 & 765-775 Old Kent Road (ref. 23/AP/1862)-on-site C3 affordable homes • Kings Place, Land At 19 21 And 23 Harper Road (ref. 23/AP/0479)- on-site C3 affordable homes and payment-in-lieu towards off-site affordable C3 to top up towards strategic affordable target • Sylvan Grove/ Daisy Business Park (ref. 23/AP/0582)- on-site C3 affordable homes and payment-in-lieu towards off-site affordable C3 to top up towards strategic affordable target • Rockingham Street (ref. 22/AP/1068)- payment-in-lieu towards off-site affordable C3 <p>This is due to the clear hierarchy within the policy that requires C3 affordable provision (or contribution as payment-in-lieu) to be prioritised and therefore only requires affordable student rents, if this is achieved and maximised. It is considered that this has resulted in clear planning benefits for LB Southwark, by not requiring direct-let PBSA schemes to either split their affordable provision, or double up on it, across two different products, Southwark have achieved a more efficient and increased delivery of affordable C3 housing, whilst also delivering on PBSA need in the borough. It is important to note that the policy also allows for a fully nominated route at P5(1) which requires the affordable provision to be in the form of affordable student rents on site only, thereby allowing for two options and routes, both of which deliver their own planning benefits; affordable student rents on site for P5(1) nominated, and affordable C3 delivery as the priority for P5(2) direct-let schemes. The approach to allowing for C3 conventional affordable provision (and therefore the co-location of C3 with PBSA, hence our suggestions on draft Policy A (1)), is supported by the PBSA LPG. This notes at paragraph 2.5.4 a number of considerations in relation to balancing C3 affordable housing and affordable student accommodation on sites, which includes (inter alia) "the acute and increasing need for C3 affordable housing", "the greater flexibility of C3 housing to meet a wider range of needs" to arrive at an appropriate balance. It is therefore considered that LB Wandsworth should consider lessons learned from the practical application and effectiveness of the LB Southwark policy, as well as the provision of the two options for schemes. It is therefore suggested that the prioritisation noted in supporting text paragraph 17.44 to the draft Policy LP28, is made clear in draft Policy LP28 and that it allows for two alternative options of planning benefit to be realised. Therefore, Draft policy LP28 should be updated to make it clear that</p>		

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						<p>either 35% on-site affordable student accommodation is provided, or affordable C3 accommodation (by way of on-site provision or a financial payment) , with the latter being the priority.</p> <p>In relation to the form that the C3 affordable provision takes (on-site provision or financial contribution), it is considered that this can also be provided in a sequential way, similarly to how this is set out in the LBW draft Policy LP30 on Build to Rent. This suggested approach is considered to represent a more robustly justified assessment based on Southwark's policy than the current draft Policy LP28. However, as noted previously, it is considered that a fully justified approach should wait to consider the strategic approach of the imminent London Plan Review.</p> <p>NPPF: effective It is considered that draft Policy LP28 is not effective, for the reasons set out in the section above, as it has been based upon existing policies from other boroughs, without assessing their effectiveness in practice, or the context of that policy as a whole. However, as currently drafted, draft Policy LP28 also provides misalignments that could affect the effectiveness of the draft policy if adopted, given that the aim is unclear. Two examples of this include:</p> <ul style="list-style-type: none"> • At Part A (1) it notes that PBSA should not take place on sites suitable for conventional housing but at supporting text paragraph 17.44 notes that this may be possible. • Parts A(2) and (3) suggest that both affordable student rent and a financial contribution to C3 should be provided on site with no distinction between the two, whilst supporting text paragraphs 17.42 and 17.43 suggests that proposals for PBSA should ensure that a C3 financial contribution is prioritised. <p>It is considered that the draft Policy is reviewed in relation to the strategic aims of the policy and the expected outcomes, to ensure that the draft Policy is worded effectively to help achieve these.</p> <p>It is also considered that a review of Policy LP28 would be most effective if it were to await updated further strategic guidance from the London Plan Review.</p> <p>NPPF: consistent with national policy</p> <p>As noted above, NPPF paragraph 63 notes in relation to establishing housing need that "Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies" and notes that these include students. For the reasons set out above in the 'positively prepared' section, the draft Policy is not considered to comply with this by not assessing or establishing the real need for student accommodation in the borough but instead basing this of previous delivery rates rather than need.</p> <p>Suggested amendments to policy The following suggestions are made:</p> <ul style="list-style-type: none"> • Updates to Policy LP28 await strategic direction from the forthcoming London Plan Review 			

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							<ul style="list-style-type: none"> Part (A)(1) of draft Policy LP28 is amended to allow for greater flexibility to co-locate PBSA and conventional C3 housing where appropriate, to align with the Mayoral LPG and acknowledge the planning benefits that can be unlocked through provision of PBSA on mixed use regeneration sites. Part A(2) and (3) and relevant supporting text of the draft Policy LP28 are reviewed in the context of the strategic aims of the policy to ensure effectiveness, and in relation to the practical applications and outcomes of policies from other boroughs, such as Southwark, with a suggest approach being to make clear the prioritisation of affordable provision, and two options rather than a doubling up of affordable provision. Suggested wording for the policy is proposed as noting either 35% on-site affordable student accommodation is provided, or C3 affordable provision accommodation with the latter being the priority. Further clarification then on if there is a sequential approach to prioritisation, this can also be provided 		
148	Ailish Collins obo Downing [See Also Row 39 and 45]	LP28		N		Justified, Consistent with national policy	<p>03. LP28: PURPOSE-BUILT STUDENT ACCOMMODATION</p> <p>03.1.1 Each proposed amendment is referenced below and the reasons why the proposed change is not consistent with the London Plan (2021) and NPPF.</p> <p>03.2 LP28 PART A 1 RESPONSE</p> <p>LP28 A I. SHOULD BE REINSTATED TO THE PREVIOUS ADOPTED WORDING.</p> <p>REASON:</p> <p>03.2.1 GLA London Plan Guidance (October 2024) is adopted supplementary planning guidance primarily to support adopted London Plan Policy H15 (2021). The PBSA guidance states when considering the role of PBSA in meeting different policy objectives as part of mixed and balanced inclusive neighbourhoods:</p> <ul style="list-style-type: none"> Housing need is met by PBSA directly through housing students (including those with 	<p>LP28 A I. SHOULD BE REINSTATED TO THE PREVIOUS ADOPTED WORDING.</p> <p>PBSA SCHEMES SHOULD PROVIDE AFFORDABLE STUDENT ACCOMMODATION IN ACCORDANCE WITH POLICY H15 OF THE LONDON PLAN, OR IN AGREEMENT WITH THE COUNCIL PROVIDING AFFORDABLE HOUSING EITHER ON SITE OR VIA A FINANCIAL CONTRIBUTION IN ACCORDANCE WITH LOCAL PLAN POLICY LP23 (AFFORDABLE HOUSING)</p>	<p>Comment Noted.</p> <p>The purpose of Part A1 to the policy is to ensure there is balance between the need to deliver student housing whilst ensuring land is appropriately safeguarded for conventional housing, including conventional affordable housing, for which a high level of need is demonstrated through the Housing Needs Assessment. The Council has recommended a potential modification for the Inspector's consideration which would further clarify Part A1 to list specific categories of site where student housing will be resisted, with particular reference to sites which are allocated or identified for conventional housing. A further modification is recommended to the supporting text which would elaborate on how these sites would be defined and identified. Further justification to the policy approach is set out in the Housing Background Paper.</p>

					<p>particular affordability and/or disability-related needs); and indirectly through helping to alleviate pressure on traditional rented homes. As such, it is counted as part of housing supply; and may also have a role in supporting wider housing delivery in an area.</p> <ul style="list-style-type: none"> • This is a shift from the situation in the 2010s. Consumer surveys suggest 'all-inclusive' rents and properties, and brand quality, are increasingly significant in students' housing choices. This reflects the desire to have more predictable bills; and dedicated study, sleeping and social spaces that are well designed and maintained. PBSA, particularly where it incorporates ASA, should therefore now have more potential to attract students out of the private rental sector. In turn, this should help alleviate demand pressures reflected in rents and availability of family-sized homes at the London-wide level. However, current indications suggest a lack of PBSA supply relative to growing numbers of students; this is instead contributing to competition and higher rents in the private rental market, especially as this is facing other constraints. • In areas where there is a lot of ongoing housing development, PBSA, along with related housing types (such as Build to Rent) has the potential to provide diversification that can help with market absorption. In this way, it can support delivery of overall housing numbers while in itself meeting an important segment of housing need. • Support for the economy is achieved by the students' spending in their local areas and taking on part-time jobs during their studies. Being able to offer accommodation guarantees (e.g. to first-year students) through PBSA is also important to the universities competing for students domestically and internationally and contributes to their ongoing viability, growth and world-class status. In turn, many people who study in London stay here after graduating, and go on to be part of London's highly qualified workforce and pool of innovative entrepreneurs. This underpins crucial economic sectors, from research and development to creative industries and professional services. • Regeneration impacts are realised through the new activity and people that are brought to an area: people who live, spend and work in the neighbourhood, adding to and typically diversifying what exists currently. Some students may go on to be longer-term residents, particularly where there is an appropriate mix of conventional housing (and workspace) in an area that they can 'graduate' into. This can contribute to the creation of new communities where an area has seen population instability, or where the land use is changing to become more residential – for example, in town centres <p>03.2.2 Paragraph 4.15.1 of the London Plan states 4.15.1 London's higher education providers make a significant contribution to its economy and labour market. It is important that their attractiveness and potential growth are not compromised by inadequate provision for new student accommodation. The housing need of students in London, whether in Purpose-Built Student Accommodation (PBSA) or shared conventional housing, is an element of the overall housing need for London determined in the 2017 London SHMA. London's overall housing need in the SHMA is expressed in terms of the number of conventional self-contained housing units. However, new flats, houses or bedrooms in PBSA all contribute to meeting London's housing need. The completion of new PBSA therefore contributes to meeting London's overall housing need and is not in addition to this need. [my bold]</p> <p>03.2.3 The proposed amendments to the policy do not consider the positive contribution PBSA accommodation brings to an area, nor that PBSA accommodation contributes to the housing delivery within the Borough.</p> <p>03.2.4 As such the proposed change to part A1 of Policy L28 FAILS the tests of soundness of the Local Plan by the changes being unjustified and inconsistent with national policy.</p> <p>03.3 LP28 PART A 2 & 3 RESPONSE PBSA SCHEMES SHOULD PROVIDE AFFORDABLE STUDENT ACCOMMODATION IN ACCORDANCE WITH POLICY H15 OF THE LONDON PLAN, OR IN AGREEMENT WITH THE COUNCIL PROVIDING AFFORDABLE HOUSING EITHER ON SITE OR VIA A FINANCIAL CONTRIBUTION IN ACCORDANCE WITH LOCAL PLAN POLICY LP23 (AFFORDABLE HOUSING) [NOTE REPRESENTATIONS HAVE ALSO BEEN MADE ON THE PROPOSED</p>	<p>[NOTE REPRESENTATIONS HAVE ALSO BEEN MADE ON THE PROPOSED AMENDMENTS TO POLICY LP23]</p> <p>DELETE Part A6 AND REPLACE WITH.... student accommodation providers and higher education providers are encouraged to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes. AND the use of the accommodation is secured for students Delete Part A.8 Paragraph 17.35 should be reinstated</p> <p>Delete Paragraph 17.45</p>	<p>The wording at Part A6 encourages applicants to prioritise the accommodation needs of local HEPs and sets out a clear sequential prioritisation based on distance. The policy does not preclude proposals which would meet the needs of an HEP outside the parameters in the policy, nor does it interfere with the London Plan approach to student housing. Rather the policy encourages applicants to demonstrate that they have prioritised locating accommodation close to the HEP it is serving, and therefore reduced the need to travel, which is considered to be a sound and justified planning principle.</p> <p>The Council has recommended a potential modification for the Inspector to consider which would clarify that Part A.8 would be subject to feasibility. This could include instances where developers can demonstrate that safeguarding considerations prevent public access to facilities.</p> <p>The Council considers its policy and supporting text to provide a clear mechanism for balancing the need for student housing with conventional housing without the express need for this to be stated in the supporting text.</p> <p>The Council's policy approach sets out that student housing schemes will be expected to contribute to both conventional affordable housing and affordable student housing (in line with the London Plan) which has been tested as part of the Whole Plan Viability Assessment. The Council has recommended a potential modification to Paragraph 17.43 for the Inspector to consider which would further clarify how the Council expects developers to calculate and prioritise their contributions towards both types of affordable housing. Further justification to the policy approach is set out in the Housing Background Paper</p>
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						<p>AMENDMENTS TO POLICY LP23] REASON 03.3.1 London Plan supporting text (paragraph 4.15.14) states that C3 (conventional) affordable housing should not be required, where part A of the policy H15 has been complied with. While PBSA need should be addressed in line with policy H15, on larger sites (typically more than 0.25 ha) the inclusion of separate conventional (C3) housing may nonetheless be acceptable and even desirable as part of pursuing mixed and inclusive neighborhood objectives. This may be particularly relevant where C3 delivery, is relatively poor, including on sites where previous C3 consents have not been built out. However, there may be trade-offs in terms of site use and management efficiency. 03.3.2 Downing do not object to the Council widening the ability for PBSA schemes to contribute towards affordable student or conventional housing subject to the wording of the policy being amended to meet the requirements of Policy 15 and build in the flexibility that is supported via the supplementary guidance for affordable housing in larger schemes (where agreed by both the applicant and the Council). 03.3.3 However as presently drafted, Policy LP28 requires schemes to provide 45% conventional affordable housing AND 35% Affordable Student Accommodation (ASA). This is a total affordable housing requirement of 80%. 03.3.4 As such the proposed change to part A2 and A3 of Policy L28 FAILS the tests of soundness of the Local Plan by the changes being unjustified and ineffective as currently drafted. 03.3.5 It also directly contradicts the GLA Practice Guidance (December 2023) which confirms Local Plans should not seek to introduce more onerous affordable housing requirements than set out in the London Plan (2021).</p> <p>03.4 LP28 PART A 6 RESPONSE DELETE AND REPLACE WITH.... student accommodation providers and higher education providers are encouraged to develop student accommodation in locations well-connected to local services by walking, cycling and public transport, as part of mixed-use regeneration and redevelopment schemes. AND the use of the accommodation is secured for students</p> <p>REASON 03.4.2 Paragraph 4.15.3 of the London Plan states There is no requirement for the higher education provider linked by the agreement to the PBSA to be located within the borough where the development is proposed. 03.4.3 Furthermore, London Plan Paragraph 4.15.3 clearly states that the strategic need for PBSA is not broken down into borough-level targets as the location of this need will vary over the Plan period. There is a need for more student accommodation to serve the strategic needs of London, not just the borough of Wandsworth. It is not considered that part 6 of Policy LP28 meets the test for being effective, in accordance 03.4.4 As such the proposed change to part A6 of Policy L28 FAILS the tests of soundness of the Local Plan by the changes being unjustified and inconsistent with national policy.</p>			

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						<p>03.5 LP28 PART A 8 RESPONSE DELETE PART A.8 REASON</p> <p>03.5.1 PBSA schemes provide communal support facilities in the form of study areas, common room lounges, sports facilities that are located predominantly within the secure environment of the accommodation. It would be a security and management issue to allow public access into secure PBSA environments.</p> <p>03.5.2 Part A 8 is unclear on the facilities that are expected to be shared with the community. It is for the LPA to determine the level of community facilities that are needed within a neighbourhood and work with the developer to deliver those public community facilities, rather than seeking to use the student facilities within a PBSA scheme.</p> <p>03.5.3 As such the proposed change to part A8 of Policy L28 FAILS the tests of soundness of the Local Plan by the changes being unjustified and ineffective.</p> <p>03.6 PARAGRAPH 17.35 17.35 The Council supports the provision of new student accommodation as long as such provision responds to a clearly identified need. While the LHNA highlights an acute need for conventional housing, insufficient provision for university students could place additional pressure on the lower end of the private rented sector (PRS), and therefore it is important that provision is made for new facilities close to their places of study in order to cater for existing and projected increases in demand. Inadequate local provision, with students having to travel long distances to attend college, would also be contrary to sustainable development principles.</p> <p>RESPONSE PARAGRAPH 17.35 SHOULD BE REINSTATED</p> <p>03.6.1 This paragraph is consistent with the GLA LHNA and recognises the contribution PBSA has to meeting housing need.</p> <p>03.7 PARAGRAPH 17.42 17.42 The London Plan identifies that more student housing is required across London. Over the past 5 years within Wandsworth around 1,000 student rooms have been either, planned, under construction or completed, providing a substantial increase in student rooms across Inner London. However, with significant pressures on the availability of land for genuinely affordable housing within the borough, the priority over the Local Plan period is to ensure new student accommodation supports the delivery of social rented housing, by safeguarding land appropriate for conventional housing and through a financial contribution towards conventional affordable housing. New purpose-built student accommodation is required to provide a financial contribution equivalent to the relevant criteria and thresholds set out within Policy LP23. The financial contribution should be calculated on the basis of the difference between the Gross Development Value including the relevant policy requirement of affordable habitable rooms, and the Gross Development Value of the scheme with no affordable habitable rooms provided, subject to viability.</p>			

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						<p>Proposals for student accommodation should ensure that this financial contribution is prioritised.</p> <p>RESPONSE 03.7.1 The London Plan requires PBSA schemes to provide on-site Affordable Student Accommodation (ASA). Off-site financial contributions should therefore only be provided where both the applicant and the council are in agreement. When calculating the off-site payment, additional adjustments should be made to reflect any increase in the costs of the private homes delivered in lieu of onsite affordable including, for example, CIL and marketing feed. Further clarification is sought on how the affordable contribution would be calculated.</p> <p>03.8 PARAGRAPH 17.44 17.44 In exceptional circumstances where a student housing development is proposed on a site which could accommodate some conventional housing, the equivalent level of affordable housing as required by Policy LP23 should be provided as a separate block on the site as part of the scheme and phased accordingly.</p> <p>RESPONSE 03.8.1 The London Plan requires PBSA schemes to provide on-site Affordable Student Accommodation (ASA). The delivery of other types of affordable housing in lieu of ASA should therefore only be provided where both the applicant and the council are in agreement. It is unclear from the currently proposed wording of Paragraph 17.44 how affordable housing provision would be calculated as a measure of PBSA. Further clarification from the LPA is sought on this point.</p> <p>03.9 PARAGRAPH 17.45 17.45 Proposals for new student accommodation which will prioritise supporting HEPs (Higher Education Providers) located within Wandsworth will be accepted on sites that are not suitable for conventional housing, such as a site located within an existing HEP campus, where conventional housing would be inappropriate.</p> <p>RESPONSE DELETE PARAGRAPH 17.45</p> <p>REASON 03.9.1 Paragraph 4.15.3 of the London Plan states there is no requirement for the higher education provider linked by the agreement to the PBSA to be located within the borough where the development is proposed. 03.9.2 Furthermore, London Plan Paragraph 4.15.3 clearly states that the strategic need for PBSA is not broken down into borough-level targets as the location of this need will vary over the Plan period. There is a need for more student accommodation to serve the strategic needs of London, not just the borough of Wandsworth. It is not considered that part 6 of Policy LP28 meets the test for being effective, in accordance with the NPPF and NPPG.</p>			

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							03.9.3 As such the proposed change paragraph 17.45 FAILS the tests of soundness of the Local Plan by the changes being unjustified and inconsistent with national policy.		
149	Lucinda Turner obo Greater London Authority [See also Row 52, 172, 180 and 198]	LP28					Student Accommodation Draft Policy LP28 supports the provision of purpose-built student accommodation (PBSA) on sites that are not suitable for conventional housing and seeks a financial contribution towards affordable housing equivalent to Local Plan Policy LP23. Whilst the Mayor does not object to the requirement for financial contributions towards conventional C3 affordable housing, it should be noted that LP2021 Policy H15 states that affordable student housing should be sought in the first place. Furthermore, there should be provision allowing schemes to follow the FTR if they provide affordable student accommodation in line with Policy H15.	Whilst the Mayor does not object to the requirement for financial contributions towards conventional C3 affordable housing, it should be noted that LP2021 Policy H15 states that affordable student housing should be sought in the first place. Furthermore, there should be provision allowing schemes to follow the FTR if they provide affordable student accommodation in line with Policy H15	The Council's policy approach sets out that student housing schemes will be expected to contribute to both conventional affordable housing and affordable student housing (in line with the London Plan) which has been tested as part of the Whole Plan Viability Assessment. The Council has recommended a potential modification to Paragraph 17.43 for the Inspector to consider which would further clarify how the Council expects developers to calculate and prioritise their contributions towards both types of affordable housing. Further justification to the policy approach is set out in the Housing Background Paper. Proposals providing both forms of affordable housing would be eligible for the Fast Track Route. The Council has recommended a potential modification to the supporting text for the Inspector to consider which would make the relationship between the policy and the Fast Track Route clearer.
150	Tom Bailey [See also Row 69]	LP28					The London plan requires affordable units in student accommodation for students. I do not understand why students should not be a priority for affordable units or how the council can override the London plan. That is also flawed.		Comment Noted. Policy LP28 has been prepared to require developers of student accommodation to contribute towards both conventional affordable housing and affordable student housing. The policy does not override the London Plan's requirements towards affordable student housing. Further justification for Policy LP28 is set out in the Housing Background Paper.
151	Battersea Society [See also Row 111, 131, 163, 181 and 192]	LP28					LP 28. Purpose-Built Student Accommodation We support the Council's aim to restrict the provision of new student accommodation, for the reasons set out in in paragraph 17.42. We are concerned, however, that the requirement that new student accommodation should be provided only on sites that are not suitable for conventional housing may be too restrictive. The number of sites that might in principle be available for new student accommodation, but not suitable for conventional housing, must be very small indeed beyond the Roehampton University campus (see paragraph 17.45). We presume that for the purposes of this proposed requirement, 'conventional housing' means housing that meets the UN definition: rooms in a 'permanent building or structurally-separated part thereof which, by the way it has been built, rebuilt or converted, is intended for habitation by one household'. We also suggest that the policy set out in the supporting text paragraph 17.44 should be included in the main policy statement. We strongly support, however, the requirement in Policy LP28 A6, that priority should be	We also suggest that the policy set out in the supporting text paragraph 17.44 should be included in the main policy statement.	Comment Noted. The purpose of Part A1 to the policy is to ensure there is balance between the need to deliver student housing whilst ensuring land is appropriately safeguarded for conventional housing, including conventional affordable housing, for which a high level of need is demonstrated through the Housing Needs Assessment. The Council has recommended a potential modification for the Inspector's consideration which would further clarify Part A1 to list specific categories of site where student housing will be resisted, with particular reference to sites which are allocated or identified for conventional housing. A further modification is recommended to the supporting text which would elaborate on how these sites would be defined and identified. Further justification to the policy approach is set out in the Housing Background Paper. Conventional housing is defined in the glossary to the Wandsworth Local Plan (2023-2038).

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							given to the needs of first, recognised HEPs in Wandsworth, and then those in neighbouring authorities or within a practical travelling distance from Wandsworth.		
152	Mr Peter Carpenter [See also Row 101, 134, 184 and 203]	LP28	Y	N	Y	Justified, Effective	The purposes are internally contradictory. 1 is contradicted by 7 and 9. It appears from 1 that the Council is proposing to drive students into ghettos which are unsuitable for other housing use. Coming from a Labour Council this is disgraceful. Anyone would think you wear a bunch of fascists. Delete 1 'Is proposed on a site which is not suitable for conventional housing'.	Delete Part 1. "is proposed on a site which is not suitable for conventional housing"	Comment Noted. The purpose of Part A1 to the policy is to ensure there is balance between the need to deliver student housing whilst ensuring land is appropriately safeguarded for conventional housing, including conventional affordable housing, for which a high level of need is demonstrated through the Housing Needs Assessment. The Council has recommended a potential modification for the Inspector's consideration which would further clarify Part A1 to list specific categories of site where student housing will be resisted, with particular reference to sites which are allocated or identified for conventional housing. A further modification is recommended to the supporting text which would elaborate on how these sites would be defined and identified. Further justification to the policy approach is set out in the Housing Background Paper.
153	Raffaele Sava [See also Row 9, 109, 136, 167, 186 and 195]	LP28					While I welcome clearer policies on student housing, I request that: • Developers be required to provide a proportion of affordable student accommodation to ensure housing is accessible to students from diverse backgrounds. • Student housing does not negatively impact the supply of homes for local residents.	• Developers be required to provide a proportion of affordable student accommodation to ensure housing is accessible to students from diverse backgrounds. • Student housing does not negatively impact the supply of homes for local residents.	Comment Noted. The Council supports these aims however the allocation of affordable student accommodation on the basis of background is largely outside of the control of planning policies. The Council has prepared Policy LP28 with the intention that it carefully balances the need for student housing with the need to safeguard land for conventional housing, including conventional affordable housing.
154	Andrew Catto obo the Putney Society [See also Row 26, 110, 137, 168, 187 and 196]	LP28					Policy LP 28 – Students Agreed that this should be related to specific educational establishments. Ideally within walking distance, even if this does mean a concentration in specific areas.		Support Noted.
155	Maurice Mcleod (Wandsworth Council) [See also Row 113, 138, 169, 188 and 202]	LP28	Y	Y	Y		I support this policy		Support Noted.

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156	<p>Leonie Charmes</p> <p>[See also Row 115, 139, 170, 189 and 197]</p>	LP28	N	N	N	<p>Positively prepared, Justified, Effective, Consistent with national policy</p>	<p>This policy is a direct attack on students and economic growth. Wandsworth is making it all but impossible to build student housing, despite students being one of the most important demographics for local economies. The Affordable Housing Mandate is Absurd - Requiring student housing developers to contribute the same level of "affordable housing" as conventional housing (LP23) makes no sense. Student housing is already a form of affordable accommodation. Students do not compete in the same market as families or working professionals. Taxing student housing like this just ensures less of it gets built.</p> <p>The "Affordable Student Housing" Requirement is Redundant - The London Plan already requires affordable student accommodation. Why add yet another layer of bureaucracy? This is just another barrier to development. The Location Restriction is Arbitrary - Forcing student housing onto "sites not suitable for conventional housing" limits supply and pushes developments into less desirable areas. If a site is viable for student housing and financially feasible, why block it?</p> <p>The Over-Concentration Rule is Nonsense - The idea that too much single-person accommodation is bad for the "balance of the area" is anti-growth nonsense. London is a global city that needs student accommodation. Artificially restricting supply drives up prices and pushes students into overcrowded HMOs, worsening rental affordability for everyone.</p> <p>The "Make Facilities Available to the Wider Community" Requirement is a Joke - Why should student accommodation be forced to act as a community center? No one applies this standard to any other type of housing. This is just another unnecessary burden on developers. The Restrictions on Losing Student Housing are Incoherent - If student housing demand drops in the future, why make conversion to another use so difficult? If we want a flexible, dynamic housing market, we should allow conversions without forcing developers to jump through hoops.</p> <p>Remove the Affordable Housing Requirement - Student housing is already a form of affordable accommodation. Taxing it like general housing makes projects unviable and reduces supply. Scrap the "Over-Concentration" Rule - There is no justification for limiting student housing clusters. Students need to live near universities. Artificial restrictions push them into the general rental market, worsening affordability. Allow Student Housing on Any Suitable Site - The current restriction to "unsuitable for conventional housing" sites arbitrarily limits development. If a site works for student housing, let it be built. Drop the Community Facility Requirement - No other housing type is forced to provide public facilities. This is an unnecessary burden that raises costs and deters investment.</p>	<p>Remove the Affordable Housing Requirement - Student housing is already a form of affordable accommodation. Taxing it like general housing makes projects unviable and reduces supply. Scrap the "Over-Concentration" Rule -There is no justification for limiting student housing clusters. Students need to live near universities. Artificial restrictions push them into the general rental market, worsening affordability. Allow Student Housing on Any Suitable Site -The current restriction to "unsuitable for conventional housing" sites arbitrarily limits development. If a site works for student housing, let it be built. Drop the Community Facility Requirement -No other housing type is forced to provide public facilities. This is an unnecessary burden that raises costs and deters investment.</p>	<p>Comment Noted.</p> <p>The Council's policy approach sets out that student housing schemes will be expected to contribute to both conventional affordable housing and affordable student housing (in line with the London Plan) which has been tested as part of the Whole Plan Viability Assessment. The Council has recommended a potential modification to Paragraph 17.43 for the Inspector to consider which would further clarify how the Council expects developers to calculate and prioritise their contributions towards both types of affordable housing. Further justification to the policy approach is set out in the Housing Background Paper.</p> <p>The purpose of Part A1 to the policy is to ensure there is balance between the need to deliver student housing whilst ensuring land is appropriately safeguarded for conventional housing, including conventional affordable housing, for which a high level of need is demonstrated through the Housing Needs Assessment. The Council has recommended a potential modification for the Inspector's consideration which would further clarify Part A1 to list specific categories of site where student housing will be resisted, with particular reference to sites which are allocated or identified for conventional housing. A further modification is recommended to the supporting text which would elaborate on how these sites would be defined and identified. Further justification to the policy approach is set out in the Housing Background Paper.</p> <p>The Council has recommended a potential modification for the Inspector to consider which would clarify that Part A.8 would be subject to feasibility. This could include instances where developers can demonstrate that safeguarding considerations prevent public access to facilities.</p>

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157	Dr Antonio Fidalgo [See also Row 120]	LP28	Y	Y	Y		The vast majority of student housing should be affordable for uk students. Moreover, an allocation should be made to small local HE providers so that they can accommodate their students within a reasonable distance from where they have lectures.		Comment Noted. The policy has been prepared to encourage student housing developments to prioritise the needs of local HEPs where possible. The policy also sets out the need to provide a proportion of rooms as affordable student accommodation, in line with the London Plan.
158	Andrew Russell obo TfL Places for London [See also Row 51 and 179]	LP28					Draft Policy LP29: Purpose Built Student Accommodation The revisions to the adopted Local Plan policy introduce a requirement to provide a financial contribution towards conventional affordable housing to be delivered off-site. This is to be calculated based on the difference between the Gross Development Value (GDV) of a policy compliant affordable offer and a scheme with no affordable housing, subject to viability. The draft policy also seeks affordable student accommodation as set out in London Plan Policy H15. We support policy providing an appropriate degree of flexibility to provide social rent on-site within a separate block, on the basis that this could address the requirement for a payment in lieu / on-site student affordable housing. However, we are confused as to whether the policy is seeking both the maximum payment in lieu and also the maximum required on-site student accommodation and this should be clarified. This is unlikely to be viable.	However, we are confused as to whether the policy is seeking both the maximum payment in lieu and also the maximum required on-site student accommodation and this should be clarified.	Comment Noted. The Council's policy approach sets out that student housing schemes will be expected to contribute to both conventional affordable housing and affordable student housing (in line with the London Plan) which has been tested as part of the Whole Plan Viability Assessment. The Council has recommended a potential modification to Paragraph 17.43 for the Inspector to consider which would clarify how the Council expects developers to calculate and prioritise their contributions towards both types of affordable housing. Further justification of Policy LP28 is set out in the Housing Background Paper
159	John Turner obo Ballymore Group [See also Row 19, 49, 143, 174 and 177]	LP28		N		Justified; Consistent with National Policy	Policy LP28 Purpose-Built Student Accommodation We do not support the proposed changes to Part A1 of Policy LP28 which seeks to introduce a test related to the suitability of the site for conventional residential. While we appreciate the pressing need for new conventional residential within the Borough GLA London Plan Guidance (October 2024) is adopted supplementary planning guidance primarily to support adopted London Plan Policy H15 (2021). The PBSA guidance states when considering the role of PBSA in meeting different policy objectives as part of mixed and balanced inclusive neighborhoods. Housing need is met by PBSA directly through housing students (including those with particular affordability and/or disability-related needs); and indirectly through helping to alleviate pressure on traditional rented homes. As such, it is counted as part of housing supply; and may also have a role in supporting wider housing delivery in an area. This is a shift from the situation in the 2010s. Consumer surveys suggest 'all-inclusive' rents and properties, and brand quality, are increasingly significant in students' housing choices. This reflects the desire to have more predictable bills; and dedicated study, sleeping and social spaces that are well designed and maintained. PBSA, particularly where it incorporates ASA, should therefore now have more potential to attract students out of the private rental sector. In turn, this should help alleviate demand pressures reflected in rents and availability of family-sized homes at the London-wide level. However, current indications suggest a lack of PBSA supply relative to the growing numbers of students; this is instead contributing to competition and higher rents in the private rental market,		Comment Noted. The purpose of Part A1 to the policy is to ensure there is balance between the need to deliver student housing whilst ensuring land is appropriately safeguarded for conventional housing, including conventional affordable housing, for which a high level of need is demonstrated through the Housing Needs Assessment. The Council has recommended a potential modification for the Inspector's consideration which would further clarify Part A1 to list specific categories of site where student housing will be resisted, with particular reference to sites which are allocated or identified for conventional housing. A further modification is recommended to the supporting text which would elaborate on how these sites would be defined and identified. Further justification to the policy approach is set out in the Housing Background Paper.

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						<p>especially as this is facing other constraints.</p> <p>In areas where there is a lot of ongoing housing development, PBSA, along with related housing types (such as Build to Rent) has the potential to provide diversification that can help with market absorption. In this way, it can support delivery of overall housing numbers while in itself meeting an important segment of housing need.</p> <p>Support for the economy is achieved by the students' spending in their local areas and taking on part-time jobs during their studies. Being able to offer accommodation guarantees (e.g. to first-year students) through PBSA is also important to the universities competing for students domestically and internationally and contributes to their ongoing viability, growth and world-class status. In turn, many people who study in London stay here after graduating and go on to be part of London's highly qualified workforce and pool of innovative entrepreneurs. This underpins crucial economic sectors, from research and development to creative industries and professional services.</p> <p>Regeneration impacts are realised through the new activity and people that are brought to an area: people who live, spend and work in the neighbourhood, adding to and typically diversifying what exists currently. Some students may go on to be longer-term residents, particularly where there is an appropriate mix of conventional housing (and workspace) in an area that they can 'graduate' into. This can contribute to the creation of new communities where an area has seen population instability, or where the land use is changing to become more residential – for example, in town centres.</p> <p>Paragraph 4.15.1 of the London Plan states:</p> <p>4.15.1 London's higher education providers make a significant contribution to its economy and labour market. It is important that their attractiveness and potential growth are not compromised by inadequate provision for new student accommodation. The housing need of students in London, whether in Purpose-Built Student Accommodation (PBSA) or shared conventional housing, is an element of the overall housing need for London determined in the 2017 London SHMA. London's overall housing need in the SHMA is expressed in terms of the number of conventional self-contained housing units. However, new flats, houses or bedrooms in PBSA all contribute to meeting London's housing need. The completion of new PBSA therefore contributes to meeting London's overall housing need and is not in addition to this need.</p> <p>The proposed amendments to the policy do not consider the positive contribution PBSA accommodation brings to an area, nor that PBSA accommodation contributes to the housing delivery within the Borough.</p> <p>As such the proposed change to part A1 of Policy L28 fails the tests of soundness of the Local Plan by the changes being unjustified and inconsistent with national policy.</p>			

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LP29 – Housing with Shared Facilities									
160	Ms Tamara Flanagan [See also Row 129, 175 and 191]	LP29	Y	Y	Y		I fully support Wandsworth councils position on HMOs		Support Noted.
161	Alice Yau obo. VSM (NCGM) Ltd. [See also Rows 37, 44, 122, 147, and 176]	LP29		N		Justified; effective	<p>DRAFT POLICY LP29- HOUSING WITH SHARED FACILITIES Policy LP29 – Housing with Shared Facilities London Plan conformity Draft Policy LP29 Part D(3) notes that proposals for large-scale purpose-built shared living ('PBSL') accommodation should "provide an financial contribution towards the provision of affordable housing in the Borough, equivalent to the corresponding threshold level set out in [draft]Policy LP23(Affordable Housing) to be provided at a discount of 50% of the market rent". This means that either draft Policy LP23's newly set 45% or 50% fast thresholds will apply, which differs from London Plan Policy H16 that stipulates the financial contribution should be the equivalent of either 35% or 50% of units. Furthermore, London Plan Policy H16 states that all PBSL schemes will be subject to the viability test route, but developments that provide a contribution equal to 35% of the units at 50% of the market rent will not be subject to a Late-Stage Viability Review. Draft Policy LP29 significantly deviates from this in stating that any PBSL schemes that do not provide a contribution equivalent to at least 50% of units will be subject to reviews mechanisms as early, late and mid stages. This is significantly more onerous and unjustified. Part F of Policy H5 of the London Plan makes it clear that Mid Term viability Reviews should be applied for prior to implementation of phases for larger phased schemes – this is not translatable for a single phased PBSL scheme. Although the supporting Viability Assessment (2024) tests Build to Rent schemes, it is not clear if PBSL have been specifically tested and it is, therefore, not demonstrated why it is appropriate to deviate from the London Plan in setting more onerous thresholds and viability review mechanisms. It reads as an overly punitive approach reflective of the policies in principle 'resistance' to PBSL.</p> <p>NPPF: positively prepared</p> <p>The provision of a policy in relation to Shared Living and PBSL, recognising this as a distinct and separate housing need, is supported and is considered to be positively prepared (subject to other elements set out in this table being addressed).</p> <p>NPPF: justified</p> <p>As noted above, the Viability Assessment does not seem to specifically test the viability of PBSL, which is a different form of tenure to standard BTR and homes for sale. It is, therefore, not justified for draft Policy LP29 to deviate from the affordable housing thresholds and viability review mechanisms of London Plan Policy H16. In addition to the</p>	<p>Suggested amendments to policy</p> <p>Remove that PBSL "will generally be resisted" from Part C and instead note that proposals should meet the requirements set out under Part C. Remove paragraph 17.58 that sets an expectation for the affordability of market rates. Draft policy LP29 should revert back to reflecting London Plan (2021) Policy H16 in setting affordable housing equivalent thresholds at 35% and 50% (not 45% and 50%), allowing for Late-Stage Viability Reviews to be avoided if the 35% threshold is met (not 50%), and removing any reference to mid-stage viability reviews in order to conform with the London Plan (2021)</p>	<p>Comment Noted.</p> <p>The Council considers Policy LP29 to be an effective and balanced approach to housing with shared facilities that sets a range of requirements for such developments to ensure they meet appropriate standards and are suitably located. Part C of the Policy aims to ensure that large-scale purpose-built shared living accommodation is resisted in light of the need to safeguard scarce land for conventional housing for which there is a much higher need locally, as identified through the Housing Needs Assessment. It does not, however, preclude such developments subject to meeting requirements C1-3. This policy approach is not subject to a proposed change as part of the Local Plan Partial Review and remains as was found to be sound and subsequently adopted in 2023.</p> <p>The changes proposed to Policy LP29 are required for consistency with Policy LP23. Overall, Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The Housing Needs Assessment identifies an extremely high need for affordable housing across the plan period, up to 23,600 affordable homes, a majority of which are needed for social rented housing. As set out in the Housing Background Paper, there are strong social and economic imperatives to plan to meet this need.</p> <p>The Council has specifically designed the policy to ensure it is effective and deliverable, as demonstrated through the evidence base. In particular, the Whole Plan Viability Assessment demonstrates that a significant number of development typologies would be viable at a 45% threshold, which is the threshold required under the Council's Fast Track Route. As set out in the Housing Background Paper, there is a strong correlation between the most viable typologies and the types of sites expected to contribute to the Borough's long-term housing supply, such that there can be overall confidence in the policy being deliverable for a</p>

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						<p>financial affordable housing contribution sought under draft Policy LP29, Para. 17.58 of the supporting text states: "It is important to ensure that large-scale purpose-built shared living can effectively contribute to the accommodation needs of its main target group, which includes young professionals and other single persons on lower quartile and median incomes.[...] Applicants will therefore be required to demonstrate that shared-living units would be more affordable for people on lower-quartile and median incomes than conventional units (including 'room only' options)." It is noted that PBSL is specifically noted as not considered suitable as a form of affordable housing itself (as per paragraph 4.16.7 of the London Plan). Whilst the above draft supporting text does not specify that the accommodation should be an affordable housing product, as traditionally understood, it is considered that the comments demonstrating affordability at paragraph 17.58 should be removed accordingly, to comply with the approach set out in the London Plan (2021). It is not considered justified to require both a financial contribution towards other affordable housing products, as well as securing rents that are affordable on the PBSL product. It is also not considered justified to control the affordability or rent levels of a market rate private product that is dictated by the market, not defined as an 'affordable product' and that entails different providers in the market with a varying range of target demographics, specifications and price points. Part C of the Draft Policy L29 notes that proposals for PBSL accommodation will 'generally be resisted'. Given that Part C goes on to set out scenarios and circumstances in which large-scale purpose-built shared living would be acceptable, this statement is not considered to be justified.</p> <p>NPPF: effective</p> <p>It is considered the wording of draft Policy LP29 and its overall negative stance and onerous affordable housing requirements set on PBSL as a housing typology has the effect of stymying its delivery. This is despite PBSL being recognised in the London Plan as potentially providing "a housing option for single person households who cannot or choose not to live in self-contained homes or HMOs" (paragraph 4.16.1) and it being considered to contribute towards housing need numbers at a ratio of 1.8: 1. The Housing Needs Assessment (December 2024) notes at paragraph 5.60 that whilst Wandsworth is projected to see only a small rise in single young person households, "as a policy led response to the increasing lack of housing for younger people in the area, the schemes could have a role in short term housing for groups such as recent graduates looking to establish themselves in Wandsworth as an alternative to living in HMOs". It is further noted at paragraph 5.61 that "Purpose built co-living could meet the needs of some single people and couples as a short-term lifestyle choice, but these individual people and couples will be looking to move to permanent accommodation 18 of one form or another." However, temporary or transient nature of accommodation is not considered to result in any less of a need for such accommodation. Examples of where this can meet a need includes: • People who are on work / training placements, like at St George's Hospital; • People who are transitioning from student living to young professional independent living; • People have moved into the Borough for the first time and are seeking an interim home to meet people and get their bearings; • People who value location and amenities over size of living space. Bullet two above is acknowledged in paragraph 5.62 of the Housing</p>		<p>significant proportion of developments. The policy also retains a Viability Tested Route which means that developments which cannot maintain viability whilst meeting the requirements of the policy can still receive planning permission. The Council also considers it important that deliverability is evaluated across a plan period and as such that it is important to avoid giving disproportionate weight to short-term market conditions when there is a fair and evidenced expectation that market conditions will improve across the plan period. For these reasons, the Council considers there to be no likelihood of the proposed policy having a materially negative impact on local housing supply or deliverability and considers the policy to provide an effective and proportionate mechanism for addressing developments which cannot meet its requirements in full. There are a number of examples of recent developments achieving or offering affordable housing percentages in excess of the existing 35% threshold which demonstrate a higher threshold can be achieved. Further analysis of the matters summarised above, and the overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.</p> <p>The Whole Plan Viability Assessment (2024) has not specifically tested the affordable housing requirements on large-scale purpose-built shared living typologies, as the relative paucity of such schemes in Wandsworth, including its housing pipeline, make such schemes a relatively unlikely typology. This approach accords with Planning Practice Guidance. Nevertheless, the Whole Plan Viability Assessment includes testing for purpose-built student housing schemes which are essentially very similar, with differences relating to length of occupation. Further information on the justification for the policy approach is set out in the Housing Background Paper.</p> <p>As stated in responses under LP23, the Council's use of mid-stage reviews would be limited to large multi-phased schemes, in line with the London Plan. The use of late-stage reviews for schemes providing under 50% affordable housing (equivalence) is considered to be a justified and effective measure for incentivising applicants to maximise the amount of affordable housing they deliver in the context of the overall 50% strategic target set out in both the London Plan and Council's Local Plan. Further justification on the use of review mechanisms in the proposed policy is set out in the Housing Background Paper. . Further detail on the relationship between Policy LP23 can be found in the Council's response to representations in the Policy LP23 section of this document.</p>	

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						<p>Needs Assessment, stating "the scale of the student numbers in Wandsworth would suggest that there may be a market for post-student self-contained units which could run in to hundreds of units and that this is likely in turn to reduce the need for larger market properties to be converted to HMOs, but LSPBSL provides short term rather than permanent housing." This is considered to be a positive benefit, to provide a transitional form of accommodation between student and young one person or couple households for young professionals in the borough. Indeed, students are often considered to be a transient population and characterised as a population that, as a result, does not get actively involved in, or invest in the success of a local community long-term. Providing short term, transitional accommodation for students in the borough, to transition from study to an early career, is considered a positive benefit, encouraging young people to stay within and contribute to, mixed and inclusive local communities, and creative industries and economic development, for the long-term.</p> <p>NPPF: consistent with national policy</p> <p>Paragraph 71 of the NPPF states that "mixed tenures can provide a range of benefits, including creating diverse communities and supporting timely build out rates, and local planning authorities should support their development through their policies and decisions". In setting a restrictive and punitive policy position on PBSL, which Local Plan paragraph 17.58 recognises as reaching a target demographic of young professionals and single persons, draft Policy LP29 is considered to not be consistent with the NPPF in encouraging a mix of tenures to meet housing need.</p> <p>Suggested amendments to policy</p> <p>Remove that PBSL "will generally be resisted" from Part C and instead note that proposals should meet the requirements set out under Part C. Remove paragraph 17.58 that sets an expectation for the affordability of market rates. Draft policy LP29 should revert back to reflecting London Plan (2021) Policy H16 in setting affordable housing equivalent thresholds at 35% and 50% (not 45% and 50%), allowing for Late-Stage Viability Reviews to be avoided if the 35% threshold is met (not 50%), and removing any reference to mid-stage viability reviews in order to conform with the London Plan (2021)</p>		<p>The provisions within Paragraph 17.58 are considered to be appropriate for ensuring that purpose-built shared living accommodation effectively contributes to the accommodation needs of its main target group, and that it can be properly appraised against the need to safeguard scarce land for conventional housing for which there is a clear and demonstrable need</p>	

<p>162</p>	<p>Zelie Batchelor obo Watkin Jones [See also Row 38, 43, 123, 146, and 178]</p>	<p>LP29</p>	<p>N</p>		<p>Positively prepared; justified; effective; consistent with national policy</p>	<p>LP29: Housing with Shared Facilities</p> <p>The proposed updated wording of Policy LP29 is as follows:</p> <div data-bbox="897 249 1619 1086" style="border: 1px solid black; padding: 5px;"> <p>LP29 Housing with Shared Facilities</p> <p>A. Development proposals for new Houses in Multiple Occupation (HMOs) will be supported where they:</p> <ol style="list-style-type: none"> Do not result in the loss of housing suitable for occupation by families as defined in Part A of Local Plan Policy LP26 (Conversions); Do not result in an overconcentration of HMOs and other single-person accommodation at the neighbourhood level; Do not give rise to adverse impacts on the amenity of the surrounding properties and the character of the neighbourhood, including as a result of cumulative impacts; Have access to good levels of public transport (PTAL 4 or higher), and to shops and services appropriate to the needs of the intended occupiers; and Provide a good quality of accommodation, in line with Policy LP27 (Housing Standards). <p>B. Development proposals that result in the loss of an HMO will be resisted unless:</p> <ol style="list-style-type: none"> It can be demonstrated that the existing building does not meet the appropriate standards for an HMO and has no realistic prospect of meeting the standards; or Adequate replacement provision can be secured within the borough, having regard to the requirements of Part A above, such that there would be no net loss in HMO floorspace. <p>C. Development proposals for large-scale purpose-built shared living accommodation which is defined as being a 'sui generis' use will generally be resisted. Such accommodation will only be permitted where:</p> <ol style="list-style-type: none"> It is proposed on a site which is not suitable for conventional housing; It is clearly demonstrated that large-scale purpose-built shared living accommodation is better suited to meeting the local housing needs than conventional housing; and It would not lead to an overconcentration of single-person accommodation at the neighbourhood level. <p>D. Where the principle of large-scale purpose-built shared living accommodation is accepted in line with Part C, proposals must:</p> <ol style="list-style-type: none"> Meet criteria A1-A9 of London Plan Policy H16; Demonstrate through the submission of a management plan that the development will be managed and maintained over its lifetime so as to ensure an acceptable level of amenity and access to facilities for its occupiers and would not give rise to unacceptable impacts on the amenities of existing residents in the neighbourhood; and Provide a financial contribution towards the provision of affordable housing in the borough, equivalent to the corresponding threshold level set out in Policy LP23(Affordable Housing) to be provided at a discount of 50% of the market rent. All large-scale purpose-built shared living schemes will be subject to the Viability Tested Route set out in Policy LP23, and any proposals which do not provide a contribution equivalent to at least 50% of units will be subject to review mechanisms (early, mid and late-stage). </div> <p>The proposed amendments to Policy LP29 are contrary to the London Plan and will result in developments being financially unviable and undeliverable, which will further suppress the ability for the Council to meet its objectively assessed local housing need. Analysis of the wording of Policy LP29 is set out below.</p> <p><u><i>D.3. Where the principle of large-scale purpose-built shared living accommodation is accepted in line with Part C, proposals must provide a financial contribution towards the provision of affordable housing in the borough, equivalent to the corresponding threshold level set out in Policy LP23 (Affordable Housing) to be provided at a discount of 50% of the market rent. All large-scale purpose-built shared living schemes will be subject to the Viability Tested Route set out in Policy LP23, and any proposals which do not provide a contribution equivalent to at least 50% of units will be subject to review mechanisms (early, mid and late-stage).</i></u></p> <p>The requirement for a financial contribution towards the provision of affordable housing equivalent to LBW's proposed Fast Track Route fails to align with the London Plan Fast Track Route in terms of the affordable housing percentage threshold, significantly exceeding the regional requirements. London Plan Policy H5 (Threshold Approach to Applications) sets out the Mayor's aspirations for a minimum of 35% of gross residential development to be affordable, and therefore the proposed affordable housing provision of</p>	<p>Proposed wording of Policy LP29</p> <p>Our recommended amendments to Policy LP29 are set out below in red.</p> <div data-bbox="1788 646 2242 1186" style="border: 1px solid black; padding: 5px;"> <p>LP29 Housing with Shared Facilities</p> <p>A. Development proposals for new Houses in Multiple Occupation (HMOs) will be supported where they:</p> <ol style="list-style-type: none"> Do not result in the loss of housing suitable for occupation by families as defined in Part A of Local Plan Policy LP26 (Conversions); Do not result in an overconcentration of HMOs and other single-person accommodation at the neighbourhood level; Do not give rise to adverse impacts on the amenity of the surrounding properties and the character of the neighbourhood, including as a result of cumulative impacts; Have access to good levels of public transport (PTAL 4 or higher), and to shops and services appropriate to the needs of the intended occupiers; and Provide a good quality of accommodation, in line with Policy LP27 (Housing Standards). <p>B. Development proposals that result in the loss of an HMO will be resisted unless:</p> <ol style="list-style-type: none"> It can be demonstrated that the existing building does not meet the appropriate standards for an HMO and has no realistic prospect of meeting the standards; or Adequate replacement provision can be secured within the borough, having regard to the requirements of Part A above, such that there would be no net loss in HMO floorspace. <p>C. Development proposals for large-scale purpose-built shared living accommodation which is defined as being a 'sui generis' use will generally be resisted. Such accommodation will only be permitted where:</p> <ol style="list-style-type: none"> It is proposed on a site which is not suitable for conventional housing; It is clearly demonstrated that large-scale purpose-built shared living accommodation is better suited to meeting the local housing needs than conventional housing; and It would not lead to an overconcentration of single-person accommodation at the neighbourhood level. <p>D. Where the principle of large-scale purpose-built shared living accommodation is accepted in line with Part C, proposals must:</p> <ol style="list-style-type: none"> Meet criteria A1-A9 of London Plan Policy H16; Demonstrate through the submission of a management plan that the development will be managed and maintained over its lifetime so as to ensure an acceptable level of amenity and access to facilities for its occupiers and would not give rise to unacceptable impacts on the amenities of existing residents in the neighbourhood; and Provide a financial contribution towards the provision of affordable housing in the borough, equivalent to the corresponding threshold level of a minimum of 35% affordable housing as set out in Policy LP23 (Affordable Housing) to be provided at a discount of 50% of the market rent. All large-scale purpose-built shared living schemes that do not meet the Fast Track Route threshold will be subject to the Viability Tested Route set out in Policy LP23, and any proposals which do not provide a contribution equivalent to at least 50% of units will be subject to review mechanisms (early, mid and late-stage). </div>	<p>Comment Noted.</p> <p>The changes proposed to Policy LP29 are required for consistency with Policy LP23. Overall, Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The Housing Needs Assessment identifies an extremely high need for affordable housing across the plan period, up to 23,600 affordable homes, a majority of which are needed for social rented housing. As set out in the Housing Background Paper, there are strong social and economic imperatives to plan to meet this need.</p> <p>The Council has specifically designed the policy to ensure it is effective and deliverable, as demonstrated through the evidence base. In particular, the Whole Plan Viability Assessment demonstrates that a significant number of development typologies would be viable at a 45% threshold, which is the threshold required under the Council's Fast Track Route. As set out in the Housing Background Paper, there is a strong correlation between the most viable typologies and the types of sites expected to contribute to the Borough's long-term housing supply, such that there can be overall confidence in the policy being deliverable for a significant proportion of developments. The policy also retains a Viability Tested Route which means that developments which cannot maintain viability whilst meeting the requirements of the policy can still receive planning permission. The Council also considers it important that deliverability is evaluated across a plan period and as such that it is important to avoid giving disproportionate weight to short-term market conditions when there is a fair and evidenced expectation that market conditions will improve across the plan period. For these reasons, the Council considers there to be no likelihood of the proposed policy having a materially negative impact on local housing supply or deliverability and considers the policy to provide an effective and proportionate mechanism for addressing developments which cannot meet its requirements in full. There are a number of examples of recent developments achieving or offering affordable housing percentages in excess of the existing 35% threshold which demonstrate a higher threshold can be achieved. Further analysis of the matters summarised above, and the overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper. Further detail on the relationship between Policy LP23 can be found in the Council's response to representations in the Policy LP23 section of this document.</p> <p>As stated in responses under LP23, the Council's use of mid-stage reviews would be limited to large multi-phased schemes, in line with the London Plan. The use of late-stage reviews for schemes providing under 50% affordable housing (equivalence) is considered to be a justified and effective measure for incentivising applicants to maximise the amount of affordable housing they deliver in the context of the overall 50% strategic target set out in both the London Plan and Council's Local Plan. Further justification on the use of review mechanisms in the proposed policy is set out in the Housing Background Paper.</p>
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						<p>45% suggested by LBW demonstrates a 10% percentage point increase above regional policy. The requirement for a Mid and Late-Stage Viability Review for all developments, regardless of if they meet the Fast Track Route or not, does not align with London Plan Policy H5 requirements which outlines that only where an application does not meet the requirements of the Fast Track Route, and must follow the Viability Tested Route will it be subject to a Late Stage Viability Review.</p> <p>In addition, the requirement for Early, Mid and Late-Stage Viability Review mechanisms for developments following a viability tested route exceeds London Plan Policy H5 policy requirements which details that only Early and Late-Stage Viability Reviews are required for viability tested developments. Mid Stage Viability Reviews are only seen as necessary for larger phased schemes within Policy H5, and therefore Policy LP29 is contrary to regional policy. This is supported by the Mayor's 'Affordable Housing and Viability' SPG (2017) guidance which outlines that on larger developments that will be built out over a number of phases, LPAs should also consider mid term reviews which are triggered prior to the implementation of phases. In addition, London Plan Draft Guidance 'Development Viability' (2023) states that Mid-Stage Viability Reviews should be provided for larger phased schemes including those that propose 500 or more residential units (or for mixed-use schemes, the equivalent amount of development in floorspace, taking into account proposed residential and non-residential uses). There may also be other circumstances where Mid-Term Reviews are required, for example, where the overall construction programme is five years or longer, or for estate regeneration schemes. On the whole, we consider that the wording of the Policy LP29 as set out in the Local Plan Partial Review is unsound. It is neither positively prepared, effective, justified or consistent with national planning policy. Our suggested amendments to Policy LP28 to make it sound are set out below</p> <p>[see also row 43 for relevant comments relating to the viability assessment]</p>		
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163	Battersea Society [See also Row 111, 131, 151, 181 and 192]	LP29					LP 29. Housing with Shared Facilities We welcome the continued restrictions on new developments of large-scale purpose-built shared living accommodation; and we support the increase – as compared to London Plan Policy H16 A10 – in the cash contribution towards the provision of conventional housing. But the wording of the first sentence of Policy LP 29 D3 is obscure at best. We fail to understand what it might mean.		Part D3 requires developers of large-scale purpose-built shared living accommodation to provide a financial contribution towards affordable housing. This contribution must be the financial equivalent of meeting the Fast Track Route thresholds within Policy LP23 (i.e. 45% for Private Sites or 50% for Public or Industrial sites) provided at a discount of 50% of market rent. Further information on how to calculate this requirement can be included in a planned Affordable Housing SPD.
164	Mr Samuel Nodet Owers [See also Row 98, 132 and 182]	LP29	Y	N	Y	Effective, Consistent with national policy	Requiring 50% contribution to affordable housing is an effective tax on new buildings which reduces the incentives to build new homes. This is not consistent with the national housing crisis.		Comment Noted. The changes proposed to Policy LP29 are required for consistency with Policy LP23. Overall, Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.
165	Mr Richard Arko-Adjei [See also Row 100, 133 and 183]	LP29	N	N	N	Positively prepared, Justified, Effective	If the goal is to expand affordable housing options while acknowledging the need for diverse living arrangements, the current policy appears overly critical of HMOs, particularly Sui Generis. I believe a more balanced approach would support high-quality Sui Generis accommodation, especially when it incorporates communal spaces.	I believe a more balanced approach would support high-quality Sui Generis accommodation, especially when it incorporates communal spaces.	Comment Noted. The Council does not consider that Policy LP29 is overly critical of HMOs or shared living developments but rather sets a range of requirements for such developments to ensure they meet appropriate standards and are suitably located. Part C of the Policy aims to ensure that large-scale purpose-built shared living accommodation is resisted in light of the need to safeguard scarce land for conventional housing for which there is a much higher need locally, as identified through the Housing Needs Assessment. It does not, however, preclude such developments subject to meeting requirements C1-3. This policy approach is not subject to a proposed change as part of the Local Plan Partial Review and remains as was found to be sound and subsequently adopted in 2023.
166	Mr Charles Glover-Short obo Southern Housing [See also Row 104, 135, 185, 194 and 201]	LP29	Y	Y	Y		We support the principle of this policy. While we note the reference to Policy H16, it may also be beneficial to refer to Policy H9, which offers general support for HMO. Both policies should be considered with regard to local context (as set out in the supporting text).		Support Noted. The Council acknowledges the reference in Policy H9 to the role of HMOs but considers that Policy LP29 is effective without a specific cross-reference to Policy H9.
167	Raffaele Sava [See also Row 9, 109, 136, 153, 186 and 195]	LP29					I acknowledge the role of co-living developments in providing housing options, but I urge the Council to: • Introduce clear minimum space standards for private rooms to ensure acceptable living conditions. • Require that a proportion of units in co-living schemes are offered at affordable rents.	• Introduce clear minimum space standards for private rooms to ensure acceptable living conditions. • Require that a proportion of units in co-living schemes are offered at affordable rents.	Comment Noted. Policy LP29 includes a cross-reference to meeting Policy LP27 which sets out a range of requirements which ensure appropriate housing standards for all new residential developments. Policy LP29 identifies that large-scale residential developments will be required to make a financial contribution towards affordable housing in lieu of affordable housing on-site. This approach is consistent with London Plan Policy H16.

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168	Andrew Catto obo the Putney Society [See also Row 26, 110, 137, 154, 187 and 196]	LP29					Policy LP29 – HMOs Why are you so afraid of concentrations of single people? Cross referring to Policy LP27 for space standards doesn't work because that refers to the NDSS which doesn't cover shared accommodation. See also below since changes between small HMO's and Class C3 dwellinghouses is permitted development		Comment Noted. Policy LP27 (Housing Standards) sets out a range of requirements which ensure appropriate housing standards for all new residential developments, and is not limited to the Nationally Described Space Standard (NDSS). The Council considers there are, nevertheless, parts of the NDSS which could be applied to developments considered under Policy LP29. The policies within the Local Plan only apply to applications requiring the consent of the Council as local planning authority and not development that is permitted development. Nevertheless, it is important that the Council's policies provide a sound framework for considering relevant issues as the permitted development framework is subject to renewal and revision. It would therefore be inappropriate for the Council's policies to carve out exceptions for permitted development.
169	Maurice Mcleod (Wandsworth Council) [See also Row 113, 138, 155, 188 and 202]	LP29	Y	Y	Y		I support this policy		Support Noted.

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170	Leonie Charmes [See also Row 115, 139, 156, 189 and 197]	LP29	N	N	N	Positively prepared; justified; effective; consistent with national policy Not Positively Prepared - It actively restricts affordable housing options like HMOs and shared living, making it harder for people to find places to live. A plan that limits supply rather than expanding it is not positively prepared. Not Justified - There is no evidence that restricting shared housing improves affordability or community well-being. The "overconcentration" rule is an arbitrary restriction designed to appease homeowners, not meet actual housing needs. Not Effective - Blocking HMOs and purpose-built shared living ensures fewer affordable options, pushing renters into higher-cost or overcrowded housing. Penalizing developers with financial contributions makes projects unviable, meaning they won't get built at all. Not Consistent with National Policy - The National Planning Policy Framework (NPPF) prioritizes housing delivery and affordability. This policy does the opposite, restricting supply and making housing more expensive. National policy supports flexible housing solutions "Wandsworth is undermining that goal. This policy shrinks supply, raises costs, and restricts choice. To be sound, it must: Remove the overconcentration rule - let demand, not arbitrary limits, shape supply. Scrap the financial contribution for shared living" stop making projects unviable. Allow HMO conversions where appropriate - not all need preserving.	This policy is paternalistic, anti-choice, and anti-affordability. Key Problems: People Should Choose How They Want to Live - Not everyone wants or can afford a traditional flat or house. HMOs and shared living exist because people demand them. Why let bureaucrats dictate housing choices? Overconcentration Rule = Protecting the Wealthy - This restriction exists to appease homeowners who don't want renters nearby. It prioritizes the comfort of the privileged over the basic right of others to find affordable housing. Shared Housing Lowers Costs" HMOs and co-living provide cheaper, flexible options. Artificially restricting supply just forces renters into more expensive, unsuitable alternatives. Punishing Developers = Fewer Homes - The financial contribution demand makes purpose-built shared living unviable. If it doesn't get built, renters suffer. This policy shrinks supply, raises costs, and restricts choice. To be sound, it must: Remove the overconcentration rule "let demand, not arbitrary limits, shape supply. Scrap the financial contribution for shared living" stop making projects unviable. Allow HMO conversions where appropriate "not all need preserving.	Comment Noted. The overconcentration clause in the policy exists not to excessively limit the ability for HMOs to be delivered but to avoid neighbourhoods becoming excessively dominated by one form or size of housing such that they cease to be mixed and balanced. The Council considers delivering and maintaining mixed and balanced neighbourhoods to be a sound and justified planning principle. Similarly the provisions of Part B to the policy aim to ensure the Borough's stock of HMOs can be maintained for the benefit of those relying upon HMOs, unless the loss can be justified due to quality or re-provision. The Council has prepared supporting evidence including a Housing Needs Assessment, Whole Plan Viability Assessment and a Housing Background Paper where the justification for the policy approach can be found. The Housing Needs Assessment identifies that the Borough has an exceptionally high need for social rented housing, a large proportion of which already exists. The changes proposed to Policy LP29 are required for consistency with Policy LP23. Overall, Policy LP23 takes a justified, effective and deliverable approach to meeting high levels of affordable housing need informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. The overall justification for the policy approach in relation to housing need, housing supply and viability are set out in detail in the Housing Background Paper.	
171	Jamie Banks [See also Row 117, 141 and 190]	LP29	N	N	N	Struggling to work out if you are morons, or purposely introducing aristocratic anti-housing policies under stealth. I would almost have more respect if you were truly self interested and representing the views of your richest inhabitants, bourgeoisie land owners, but all but preventing any new development. However I sense you are actually well intentioned, and just incredibly dim. I wonder if any of you have taken even a first year economics course?	Struggling to work out if you are morons, or purposely introducing aristocratic anti-housing policies under stealth. I would almost have more respect if you were truly self interested and representing the views of your richest inhabitants, bourgeoisie land owners, but all but preventing any new development. However I sense you are actually well intentioned, and just incredibly dim. I wonder if any of you have taken even a first year economics course?	Comment Noted. The Council has prepared supporting evidence including a Whole Plan Viability Assessment and a Housing Background Paper where the justification for the policy approach can be found.	

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172	Lucinda Turner obo Greater London Authority [See also Row 52, 149, 180 and 198]	LP29					Housing with shared facilities Draft Policy LP29 of the Plan requires schemes for housing with shared facilities which do not provide a contribution equivalent to at least 50 per cent of units to be subject to review mechanisms. This is not consistent with LP2021 Policy H16 which sets the requirement at 35 per cent and should be amended accordingly.	Draft Policy LP29 of the Plan requires schemes for housing with shared facilities which do not provide a contribution equivalent to at least 50 per cent of units to be subject to review mechanisms. This is not consistent with LP2021 Policy H16 which sets the requirement at 35 per cent and should be amended accordingly	Comment Noted. The Council has prepared supporting evidence including a Housing Needs Assessment, Whole Plan Viability Assessment and a Housing Background Paper where the justification for the policy approach can be found. The Housing Needs Assessment identifies that the Borough has an exceptionally high need for social rented housing, a large proportion of which already exists. The changes proposed to Policy LP29 are required for consistency with Policy LP23. Overall, the Council has taken a balanced and evidence-based approach to meeting high levels of affordable housing need whilst maintaining overall deliverability and is informed by a range of evidence including a Housing Needs Assessment and a Whole Plan Viability Assessment. This Whole Plan Viability Assessment demonstrates that a significant number of development typologies would be viable at a 45% threshold, which is the threshold required under the Council's Fast Track Route, with the 50% discount being broadly equivalent to the Council's preferred tenure split, such that there can be overall confidence in the policy being deliverable for a significant proportion of developments. The policy also retains a Viability Tested Route which means that developments which cannot maintain viability whilst meeting the requirements of the policy can still receive planning permission. Overall, the Council considers its policy approach to be effective, justified and deliverable. Further information can be found in the Housing Background Paper.
173	Dr Vanessa Yardley [See also Row 142]	LP29	Y	Y	Y		2. Suggest that 17.57 and 17.59 are moved up in section order. Emphasis should be on the provision of conventional accommodation rather than HMOs. They do have a place but quality is hugely variable and the Council will need to rigorously monitor provision.	2. Suggest that 17.57 and 17.59 are moved up in section order.	Comment Noted. The Council is satisfied that the ordering of the paragraphs is effective as currently prepared.
174	John Turner obo Ballymore Group [See also Row 19, 49, 143, 159, and 177]	LP29					Policy LP29 Housing with Shared Facilities We do not consider there to be any specific justification that proposals which meet the fast-track route (policy compliant levels of affordable housing in line with LP23) should be required to submit a viability assessment. Given that the Council within the same policy agree that policy compliant levels are not subject to review mechanisms we cannot see any material reason why a viability assessment would be required. Ultimately the need for a viability assessment to be submitted would only serve to delay the determination of the development with no tangible reasons or benefits associated with its provision.		Comment Noted. The requirement for all large-scale purpose built shared living schemes to be subject to the Viability Tested Route is set out in Policy H16 of the London Plan at Part A10). The inclusion of that requirement within Policy LP29 is considered to be required to ensure conformity with the London Plan.

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LP30 – Build to Rent									
175	Ms Tamara Flanagan [See also Row 129, 160 and 191]	LP30	Y	Y	Y		I fully support Wandsworth Councils policy position on Build to Rent		Support Noted.
176	Alice Yau obo. VSM (NCGM) Ltd. [See also Rows 37, 44, 122, 147, and 161]	LP30		N		Justified, Effective, Consistent with national policy	<p>DRAFT POLICY LP30- BUILD TO RENT Policy LP30 – Build to Rent</p> <p>London Plan Conformity</p> <p>Similarly to the comments on draft LP23 and LP29 above, it is considered that the requirement for affordable housing to be provided in line with LP23 is not consistent with the London Plan (2021), based on the current draft provisions of Policy LP23. Therefore, it is suggested that this wording is updated to reference compliance with the Fast Track Thresholds as set out in Policy H5 of the London Plan. The draft Policy LP30 is also considered to not comply with Policy H11 of the London Plan (2021) in relation to the approach to affordable provision. Policy H11 sets out at Part A that “the affordable housing offer can be solely Discounted Market Rent (DMR) at a genuinely affordable rent, preferably London Living Rent level.” Draft Policy LP30 is directly in conflict with this approach, setting out a cascade mechanism under Part A (1) that prioritises affordable provision to be on-site via a separate residential block for low cost rented housing to be managed by a Registered Provider, followed by provision of these units off-site, and finally followed by a financial contribution equivalent to this. This mechanism set out under draft Policy LP30 does not allow for the affordable provision on Build to Rent developments to be provided as Discount Market Rent (‘DMR’), which is not in conformity with the provisions of the London Plan (2021).</p> <p>NPPF: positively prepared</p> <p>No comment</p> <p>NPPF: justified</p> <p>The Viability Assessment (2024) accompanying the Local Plan Partial Review sets out the results of testing Build to Rent (‘BtR’) scenarios at Appendix 13. This demonstrates significantly lower viability performance than the traditional for sale residential. There are a far greater number that are not achieving the required viability levels, suggesting that the approach to affordable tenures and the lack of inclusion of DMR needs to be reconsidered. Furthermore, it is noted that a number of the typologies assessed, and that come out as more viable, in line with achieving 30%+, are not considered as applicable to BtR schemes as many consist of 1-75 homes/flats. It is noted that the majority of BtR</p>	Remove reference for compliance with LP23 affordable thresholds and refer to London Plan Policy H5 thresholds instead at 35% and 50% (not 45% and 50% as drafted). • Amend the cascade mechanism setting out the preferences for affordable housing provision to allow for the inclusion of DMR as an acceptable onsite affordable provision, in line with London Plan Policy H16 and the NPPF (December 2024) • Update Part 2 to note that dwelling mix for Build to Rent should take account of local evidence of need and demand and does not require strict alignment with Draft Policy LP23 as a reflection of the different nature and target demographic of this tenure. It is considered that Draft Policy LP23 is written and evidenced to more clearly relate to private market sale, social rent and intermediate products – it is not demonstrably transferrable to BTR	<p>The Council has prepared supporting evidence including a Housing Needs Assessment, Whole Plan Viability Assessment and a Housing Background Paper where the justification for the policy approach can be found. The Housing Needs Assessment identifies that the Borough has an exceptionally high need for social rented housing, a large proportion of which already exists. The Housing Needs Assessment also identifies that forms of intermediate housing, including Discounted Market Rent fail to meet the needs of a majority of the Borough's residents. The Council considers that Discounted Market Rent should be resisted where there are feasible opportunities to instead deliver more affordable tenures. This approach is already included in the adopted Wandsworth Local Plan (2023-2038) Build to Rent policy and is specifically allowed for in the London Plan at supporting paragraph 4.11.10.</p> <p>The Council has recommended a proposed modification to Policy LP24 for the Inspector's consideration which would provide greater flexibility for types of development which can demonstrate a different housing mix need to that set out for C3 Market and Affordable Housing.</p> <p>The Council considers that this evidence base demonstrates that a majority of likely development types coming forward in the Borough would be viable under the policy proposals with the typologies including a range of scheme sizes above 50 units, the bulk of which far exceed 50 units (including schemes of between 75 and 1750 units). The affordable housing requirements are also subject to the provisions of the Viability Tested Route set out in Policy LP23. Further justification for the policy approach can be found in the Housing Background Paper.</p>

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						<p>schemes are usually at least 80 units plus and are usually located in higher densities. Furthermore, the London Plan defines purpose built BtR development of consisting of at least 50 homes, as per Part B(1) of Policy H16, and therefore a large number of these sizes should not be considered under the assessment for BtR. Therefore, it is suggested that the approach to affordable tenures on BtR developments in Draft Policy LP23 is re-considered to ensure that development is viable and deliverable.</p> <p>NPPF: effective</p> <p>Part 2 notes that the dwelling sizes should be in line with Policy LP24 'Housing Mix'. It is considered that this does not consider the potential for differences in housing need for this typology and tenure. The Housing Needs Assessment (2024) notes at paragraph 5.61 that "PRS is an important tenure that has grown since 1991 to house a significant proportion of 20 other households. It may be that dwellings are currently being built as family housing but are being occupied by sharing young households". This acknowledges and reflects that dwelling sizes are often occupied differently than intended in the PRS and Build to Rent sector, and it is considered that the proposed policy position should allow flexibility to reflect these differences.</p> <p>NPPF: consistent with national policy</p> <p>Annex 2 of the NPPF sets out the definitions of different types of affordable housing products. In addition to social rent and other affordable housing for rent, there is a separate definition of "c) Discounted market sales housing: is that sold at a discount of at least 20% below local market value. Eligibility is determined with regard to local incomes and local house prices. Provisions should be in place to ensure housing remains at a discount for future eligible households." Draft Policy LP30 removes the potential for Discounted Market Rent to be provided on site, instead only allowing for social rent or other low-cost affordable rent products to be provided with a separate core and managed by a Registered Provider. This approach is inconsistent with the NPPF's (2024) definition of 'Other affordable housing for rent' under Annex 2: Glossary, where it states (Turley emphasis added): "Other affordable housing for rent: meets all of the following conditions: (a) the rent is set in accordance with the Government's rent policy for Affordable Rent, or is at least 20% below local market rents (including service charges where applicable); b) the landlord is a registered provider, except where it is included as part of a Build to Rent scheme (in which case the landlord need not be a registered provider); and c) it includes provision to remain at an affordable price for future eligible households, or for the subsidy to be recycled for alternative affordable housing provision. For Build to Rent schemes affordable housing for rent is expected to be the normal form of affordable housing provision (and, in this context, is known as Affordable Private Rent)"</p> <p>Suggested amendments to policy</p> <p>It is suggested to: • Remove reference for compliance with LP23 affordable thresholds and refer to London Plan Policy H5 thresholds instead at 35% and 50% (not 45% and 50%)</p>			

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							as drafted). • Amend the cascade mechanism setting out the preferences for affordable housing provision to allow for the inclusion of DMR as an acceptable onsite affordable provision, in line with London Plan Policy H16 and the NPPF (December 2024) • Update Part 2 to note that dwelling mix for Build to Rent should take account of local evidence of need and demand and does not require strict alignment with Draft Policy LP23 as a reflection of the different nature and target demographic of this tenure. It is considered that Draft Policy LP23 is written and evidenced to more clearly relate to private market sale, social rent and intermediate products – it is not demonstrably transferrable to BTR		
177	John Turner obo Ballymore Group [See also Row 19, 49, 143, 159, and 174]	LP30					<p>Policy LP30 Build to Rent</p> <p>Ballymore supports the inclusion of a Build to Rent policy within the draft Local Plan, the delivery of Build to Rent (BtR) housing can often improve the viability of a scheme (particularly as part of a wider strategic site) and therefore will assist the Council in meeting their housing targets over the Plan period.</p> <p>The Build to Rent requirements set out within draft Policy H5 largely reflect Policy H11 in the London Plan and are therefore supported, with the exception of the affordable housing requirement. At present, the draft policy requires affordable housing within BtR schemes to be provided in line with draft policy LP23 – i.e. a 70/30 tenure split between social rent and intermediate housing. However, it is not appropriate to provide social rent housing within a Build to Rent block as this would require the provision of a separate core and for the social rented accommodation to be under separate management (i.e. a Registered Social Landlord). DMR (Discounted Market Rent) housing is therefore the only appropriate affordable tenure within Build to Rent housing, and the draft policy should be amended to reflect London Plan policy H11 in this regard.</p>	DMR (Discounted Market Rent) housing is therefore the only appropriate affordable tenure within Build to Rent housing, and the draft policy should be amended to reflect London Plan policy H11 in this regard.	<p>Comments Noted.</p> <p>The Council has prepared supporting evidence including a Housing Needs Assessment, Whole Plan Viability Assessment and a Housing Background Paper where the justification for the policy approach can be found. The Housing Needs Assessment identifies that the Borough has an exceptionally high need for social rented housing, a large proportion of which already exists. The Housing Needs Assessment also identifies that forms of intermediate housing, including Discounted Market Rent fail to meet the needs of a majority of the Borough's residents. The Council considers that Discounted Market Rent should be resisted where there are feasible opportunities to instead deliver more affordable tenures. This approach is already included in the adopted Wandsworth Local Plan (2023-2038) Build to Rent policy and is specifically allowed for in the London Plan at supporting paragraph 4.11.10.</p> <p>The Council considers that this evidence base demonstrates that a majority of likely development types coming forward in the Borough would be viable under the policy proposals with the typologies including a range of scheme sizes above 50 units, the bulk of which far exceed 50 units (including schemes of between 75 and 1750 units). The affordable housing requirements are also subject to the provisions of the Viability Tested Route set out in Policy LP23. Further justification for the policy approach can be found in the Housing Background Paper.</p>

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178	Zelie Batchelor obo Watkin Jones [See also Row 38, 43, 123, 146 and 162]	LP30		N		Positively prepared; justified; effective; consistent with national policy	<p>LP30: Build to Rent</p> <p>The proposed updated wording of Policy LP30 is as follows:</p> <div style="border: 1px solid black; padding: 5px;"> <p>LP30 Build to Rent</p> <p>A. Development proposals for Build to Rent housing which meet the criteria set out in Part B to London Plan Policy H11 will be supported where they:</p> <p>1. Provide affordable housing in line with Policy LP23 (Affordable Housing), subject to the following additional requirements:</p> <p>a. Where a development has potential to include more than one residential core and/or block, applicants should use this separate core and/or block to provide low cost rented housing to be managed by a registered provider. To follow the Council's Fast Track Route, 70 per cent of the overall affordable housing requirement should be provided as social rented units within this separate core and/or block, with the remaining 30 per cent at a range of genuinely affordable rents to meet priority housing need in Wandsworth.</p> <p>b. Where an applicant can demonstrate to the Council's satisfaction that it is not feasible in design and viability terms to include a separate residential core and/or block in the development proposal, the Council will accept the provision of the equivalent number, tenure and quality of affordable housing units being provided off-site.</p> <p>c. Where an applicant can demonstrate to the Council's satisfaction that it is not feasible to include a separate residential core and/or block in the development proposal or to provide the affordable housing units off-site, the Council will accept a financial contribution equivalent to the requirements of Policy LP23 (Affordable Housing).</p> <p>d. If the above requirements are not met, the scheme must follow the Viability Tested route set out in Policy LP23 (Affordable Housing). In these circumstances, the Council will seek from the applicant the optimum affordable housing offer for the development as a whole.</p> <p>2. Provide a mix of dwelling sizes that meets identified local housing needs, in accordance with Policy LP24 (Housing Mix).</p> </div> <p>The proposed amendments to Policy LP30 are contrary to the London Plan and likely to result in developments being financially unviable and undeliverable, which will further suppress the ability for the Council to meet its objectively assessed local housing need. Analysis of the wording of Policy LP30 is set out below.</p> <p><u><i>A.1.a. Development proposals for Build to Rent housing which meet the criteria set out in Part B to London Plan Policy H11 will be supported where they provide affordable housing in line with Policy LP23 (Affordable Housing), subject to the following additional requirements: Where a development has potential to include more than one residential core and/or block, applicants should use this separate core and/or block to provide low cost rented housing to be managed by a registered provider. To follow the Council's Fast Track Route, 70 per cent of the overall affordable housing requirement should be provided as social rented units within this separate core and/or block, with the remaining 30 per cent at a range of genuinely affordable rents to meet priority housing need in Wandsworth.</i></u></p> <p>The requirement for a financial contribution towards the provision of affordable housing equivalent to LBW's proposed Fast Track Route fails to align with the London Plan Fast Track Route in terms of the the affordable housing percentage threshold, significantly exceeding the regional requirements. London Plan Policy H11 (Build to Rent) sets out the Mayor's aspirations for Build to Rent schemes to deliver a minimum of 35% affordable housing, and therefore the proposed affordable housing provision of 45% suggested by LBW demonstrates a 10% increase above regional policy. 24 In addition, the request for</p>	<p>Proposed wording of Policy LP30</p> <p>Our recommended amendments to Policy LP30 are set out below in red.</p> <div style="border: 1px solid black; padding: 5px;"> <p>LP30 Build to Rent</p> <p>A. Development proposals for Build to Rent housing which meet the criteria set out in Part B to London Plan Policy H11 will be supported where they:</p> <p>1. Provide affordable housing in line with Policy LP23 (Affordable Housing), subject to the following additional requirements:</p> <p>a. Where a development has potential to include more than one residential core and/or block, applicants should use this separate core and/or block to provide low cost rented housing to be managed by a registered provider. To follow the Council's Fast Track Route, 70 30 per cent of the overall affordable housing requirement should be provided as social rented units within this separate core and/or block, with the remaining 30 per cent at a range of genuinely affordable rents to meet priority housing need in Wandsworth, with the remaining 40% to be agreed by the Borough based on identified need.</p> <p>b. Where an applicant can demonstrate to the Council's satisfaction that it is not feasible in design and viability terms to include a separate residential core and/or block in the development proposal, the Council will accept the provision of the equivalent number, tenure and quality of affordable housing units being provided off-site.</p> <p>c. Where an applicant can demonstrate to the Council's satisfaction that it is not feasible to include a separate residential core and/or block in the development proposal or to provide the affordable housing units off-site, the Council will accept a financial contribution equivalent to the requirements of Policy LP23 (Affordable Housing).</p> <p>d. If the above requirements are not met, the scheme must follow the Viability Tested route set out in Policy LP23 (Affordable Housing). In these circumstances, the Council will seek from the applicant the optimum affordable housing offer for the development as a whole.</p> <p>2. Provide a mix of dwelling sizes that meets identified local housing needs, in accordance with Policy LP24 (Housing Mix).</p> </div>	<p>Comments Noted.</p> <p>The Council has prepared supporting evidence including a Housing Needs Assessment, Whole Plan Viability Assessment and a Housing Background Paper where the justification for the policy approach can be found. The Housing Needs Assessment identifies that the Borough has an exceptionally high need for social rented housing, a large proportion of which already exists. The Housing Needs Assessment also identifies that forms of intermediate housing, including Discounted Market Rent fail to meet the needs of a majority of the Borough's residents. The Council considers that Discounted Market Rent should be resisted where there are feasible opportunities to instead deliver more affordable tenures. This approach is already included in the adopted Wandsworth Local Plan (2023-2038) Build to Rent policy and is specifically allowed for in the London Plan at supporting paragraph 4.11.10.</p> <p>The Council considers that this evidence base demonstrates that a majority of likely development types coming forward in the Borough would be viable under the policy proposals with the typologies including a range of scheme sizes above 50 units, the bulk of which far exceed 50 units (including schemes of between 75 and 1750 units). The affordable housing requirements are also subject to the provisions of the Viability Tested Route set out in Policy LP23. Further justification for the policy approach can be found in the Housing Background Paper.</p>

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						<p>the use of more than one residential core to provide affordable housing should be reworded to residential block only, given that the new Building Safety Act guidelines require multiple means of escape for all 'higher risk buildings' for fire safety reasons.</p> <p><i>A.1.c. Development proposals for Build to Rent housing which meet the criteria set out in Part B to London Plan Policy H11 will be supported where they provide affordable housing in line with Policy LP23 (Affordable Housing), subject to the following additional requirements: where an applicant can demonstrate to the Council's satisfaction that it is not feasible to include a separate residential core and/or block in the development proposal or to provide the affordable housing units off site, the Council will accept a financial contribution equivalent to the requirements of Policy LP23 (Affordable Housing)</i></p> <p>This part of the policy is contrary to the NPPF and London Plan which both support Discount Market Rent tenures to be brought forward as an affordable products alongside market tenures. London Plan Policy H11 states at B.5) that there should be a unified ownership and unified management approach of the private and Discount Market Rent elements of a scheme. The draft policy moves away from this by insisting on separate blocks or delivery off-site, or if this is not feasible, a financial contribution. This policy seeks to act contrary to the planning objectives to provide mixed and balanced communities and therefore is not positively prepared.</p> <p>[see also row 43 for relevant comments relating to the viability assessment]</p>			
179	<p>Andrew Russell obo TfL Places for London</p> <p>[See also Row 51 and 158]</p>	LP30		N	Justified	<p>Draft Policy LP30 Build to Rent</p> <p>The proposed approach represents a significant deviation from London Plan Policy H11. Build to Rent proposals within Wandsworth would be required to navigate a number of very challenging, complex and time-consuming planning policy hurdles before they can be considered acceptable by the borough. This includes:</p> <p>a) First, demonstrating whether there is potential to provide a separate core and/or block in social rent tenure within a development proposal / site. In relation to cores, it is worth noting that the requirements of Policy LP30A1a would mean a total of 4 cores under emerging approach for High Risk Buildings over 18 metres which would have significant viability implications and should be tested.</p> <p>b) Second, where on-site social rent provision is not possible, demonstrating that the equivalent number of social rent homes can be provided off-site. Presumably this would require a donor site and linked planning application or detail to be prepared by applicants to demonstrate that no potential donor sites are available. This would add significant complexity, uncertainty, risk and delays to any proposal).</p> <p>c) Third, where neither of the above options are feasible, the proposed draft policy would require any Build to Rent scheme to follow to Viability Tested Route. It states that the Council's preference is for a cash financial payment in lieu, rather than London Plan compliant Build to Rent affordable tenure split.</p> <p>We have our own Build to Rent programme in partnership with Grainger - Connected Living London. See here for further information.</p>	<p>We recommend that clauses b, c and d of the policy should be deleted and replaced with policies in keeping with the London Plan Fast Track Route and London Plan Policy H11.</p>	<p>Comments Noted.</p> <p>The Council has prepared supporting evidence including a Housing Needs Assessment, Whole Plan Viability Assessment and a Housing Background Paper where the justification for the policy approach can be found. The Housing Needs Assessment identifies that the Borough has an exceptionally high need for social rented housing, a large proportion of which already exists. The Housing Needs Assessment also identifies that forms of intermediate housing, including Discounted Market Rent fail to meet the needs of a majority of the Borough's residents. The Council considers that Discounted Market Rent should be resisted where there are feasible opportunities to instead deliver more affordable tenures. This approach is already included in the adopted Wandsworth Local Plan (2023-2038) Build to Rent policy and is specifically allowed for in the London Plan at supporting paragraph 4.11.10.</p> <p>The Council considers that this evidence base demonstrates that a majority of likely development types coming forward in the Borough would be viable under the policy proposals with the typologies including a range of scheme sizes above 50 units, the bulk of which far exceed 50 units (including schemes of between 75 and 1750 units). The affordable housing requirements are also subject to the provisions of the Viability Tested Route set out in Policy LP23. Further justification for the policy approach can be found in the Housing Background</p>	

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							<p>We feel that the Build to Rent sector needs more support via planning policy in London, in line with the London Plan. We question how the approach can be considered in generally consistent with the London Plan for the reasons set out below:</p> <ul style="list-style-type: none"> • Paragraph 4.11.1 of the London Plan states that 'boroughs should take a positive approach to the Build to Rent sector'. This is in recognition of the role that the Build to Rent sector plays in terms of housing delivery in London. • London Plan Policy H11 sets out an enabling planning policy framework for Build to Rent developments in London, ensuring high quality, professionally managed housing stock with unified ownership. • London Plan Policy H11 permits wholly intermediate rent affordable housing comprised of London Living Rent and Discount Market Rent. Applications are eligible for the GLA Fast Track Route where 30% of the required threshold level of affordable housing is secured at the GLA's London Living Rent levels and the remainder set at a range of genuinely affordable discounts to market rent level. • It should be noted that London Living Rent provides substantial discount relative to market rent levels in Wandsworth and should be considered a policy compliant affordable housing offer on Build to Rent schemes, in line with the London Plan. • The approach to affordable housing for Build to Rent schemes in the London Plan is bespoke to the sector for the reasons set out in paragraph 4.11.3. Build to Rent providers are not normally Registered Providers and incorporating separate cores and blocks to be managed by Registered Providers within Build to Rent is not often feasible due to layout, management, ownership and investment reasons. • We recognise that paragraph 4.11.10 of the London Plan does potentially provide a degree of scope for boroughs to introduce Local Plan policies requiring low cost rent housing on Build to Rent schemes where this can be justified and adopted via Local Plans. However, to add the further layers of complexity and policy hurdles through the cascade approach set out in draft Policy LP30 would, in our view, entirely depart from the London Plan. This would mean that all Build to Rent schemes in Wandsworth would need to follow the Viability Tested Route and a far more challenging and unpredictable avenue compared to what was envisaged in the London Plan. • Importantly, cash payments in lieu are meant to be the reserve of exceptional limited circumstances on major developments containing conventional housing in Class C3 use, requiring robust justification, as set out in London Plan Policy H4 and the NPPF. However, the proposed approach in draft Policy LP30 seeks to normalise reliance on either off-site and/or cash payment in lieu approaches on Build to Rent schemes. This clearly conflicts with national policy and the London Plan. <p>To reiterate this point, we refer to paragraphs 4.49 and 4.4.10 of the London Plan:</p> <p>Affordable housing should only be accepted as an off-site contribution in exceptional circumstances where it can be robustly demonstrated that affordable housing cannot be delivered on-site or where an off-site contribution would better deliver mixed and inclusive communities than an on-site contribution.</p> <p>Cash in lieu contributions should be used in even more limited circumstances,⁵⁵ and only where there is detailed evidence to demonstrate that on-site affordable housing delivery is</p>	<p>Paper.</p> <p>The Council agrees that financial contributions should generally be a last resort for securing affordable housing and hence Policy LP30 has been prepared to sequentially prefer on-site or off-site delivery wherever feasible. The Council considers that securing a financial contribution which can be used towards types of affordable housing that best meet local needs, including for social rented housing, is an overall more effective and justified approach than a policy which defaults to the delivery of Discounted Market Rent on-site, which, as stated above, has been shown through the Council's evidence base to be an ineffective product for a majority of the Borough's residents with affordable housing needs. The Council has a strong track record in spending financial contributions and has a range of Council-led housing programmes, including Homes for Wandsworth, which mean that financial contributions can be effectively used to acquire or develop new affordable housing.</p>	

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						<p>not practical, off-site options have been explored but are not acceptable and that accepting a cash in lieu contribution will not be detrimental to the delivery of mixed and inclusive communities.</p> <p>The impact of boroughs adopting more restrictive Local Plan policies on Build to Rent developments must be carefully considered in terms of housing supply and the overall health of this important sector. Research by the British Property Federation published in July 2024 shows that the potential Build to Rent pipeline in London totalled 100,000 homes, including 44,000 completions, with a further 17,000 homes under construction and 36,000 in planning.</p> <p>Build to Rent schemes meet identified and rapidly growing housing need in London, as evidenced in the 2017 London Strategic Housing Market Assessment and Housing in London Reports published GLA which inform the Mayor's Housing Strategy . Research by JLL published in 2023 showed:</p> <ul style="list-style-type: none"> • Nearly one third of housing starts in London were within Build to Rent schemes • between 2011 and 2021, the number of households within the private rented sector rose 33%, exceeding 1 million in 2021-22 and overtaking the number of owner-occupiers with a mortgage. • The proportion of households renting has doubled since the English Housing Survey began tracking this in 2003-04. This is being driven by population increase, net migration trends and rising house prices relative to salaries. • In total, £15 billion has been invested in London Build to Rent sector since the start of 2015, funding 42,147 homes. <p>We consider that a more appropriate balance needs to be taken to ensure social rent is delivered but also enable the Build to Rent sector in London to thrive. The GLA Practice Note states: 'While the overwhelming need in London is for social rented housing, the GLA believes that supporting intermediate rent homes helps those on middle incomes, which in turn benefits London's economy and services, and can also help wider viability issues on projects.'</p> <p>In summary, we consider draft policy LP30 Build to Rent to be in conflict with the London Plan for the reasons set out above. The proposed policy cascade prioritises off-site affordable and financial payments in lieu on Build to Rent schemes. It would remove the ability for London Plan compliant Build to Rent schemes from following the Viability Tested Route. This could have a significant negative impact on housing supply from the Build to Rent sector. The implications of relying on cash payments to fund affordable housing, rather than on-site provision as prioritised in the NPPF and London Plan has not been appropriately considered. We therefore consider that the approach is unjustified and unsound.</p> <p>We recommend that clauses b, c and d of the policy should be deleted and replaced with policies in keeping with the London Plan Fast Track Route and London Plan Policy H11.</p>			

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180	Lucinda Turner obo Greater London Authority [See also Row 52, 149, 172, and 198]	LP30					Build to Rent Accommodation Draft Policy LP30 of the Plan sets out that for Build to Rent developments to follow the Council's FTR 70 per cent of the overall affordable housing requirement should be provided as social rented units, with the remaining 30 per cent of units provided as a range of genuinely affordable rents. In line with LP2021, for clarity, the policy should specify that the remaining 30 per cent of affordable units should be provided as intermediate housing (e.g. London Living Rent or Discounted Market Rent). The GLA has published the Accelerating Housing Delivery Planning and Housing Practice Note December 2024 which provides further support in the delivery of intermediate rent units, relating to the maximum income threshold, maximum housing costs, and flexibility on grant funding eligibility.	In line with LP2021, for clarity, the policy should specify that the remaining 30 per cent of affordable units should be provided as intermediate housing (e.g. London Living Rent or Discounted Market Rent). The GLA has published the Accelerating Housing Delivery Planning and Housing Practice Note December 2024 which provides further support in the delivery of intermediate rent units, relating to the maximum income threshold, maximum housing costs, and flexibility on grant funding eligibility.	Comment Noted. The Council has recommended a potential modification for the Inspector to consider which would update the supporting text to clarify that the remaining 30% should be a range of intermediate rents.
181	Battersea Society [See also Row 111, 131, 151, 163 and 192]	LP30					LP 30. Build to Rent We support the new requirements to make this policy consonant with Policy LP23. We also support the suggestion in paragraph 17.64 that the Council should resist the inclusion of Discounted Market Rent products among the affordable housing to be provided. We suggest that this should be included within the policy itself, rather than being relegated to the supporting text.		Support Noted. The policy sets out a sequential approach to meeting affordable housing requirements. It is therefore not considered necessary to include references to Discounted Market Rent (DMR) within the policy as DMR is clearly excluded from the requirements in the policy.
182	Mr Samuel Nodet Owers [See also Row 98, 132 and 164]	LP30	Y	N	Y	Effective, Consistent with national policy	More regulation on new buildings reduces the incentives to build which is not consistent with the national housing crisis. Terrible policy proposal		Comment Noted. The Council has prepared supporting evidence including a Whole Plan Viability Assessment and a Housing Background Paper where the justification for the policy approach can be found. The Council considers that this evidence base demonstrates that a majority of likely development types coming forward in the Borough would be viable under the policy proposals, with the affordable housing requirements subject to the provisions of the Viability Tested Route set out in Policy LP23. As a result, the Council considers there to be no likelihood of the proposed policy having a materially negative impact on local housing supply. Further justification for the policy approach can be found in the Housing Background Paper.
183	Mr Richard Arko-Adjei [See also Row 100, 133 and 165]	LP30	N	N	Y	Positively prepared, Justified, Effective, Consistent with national policy	The current policy seems disproportionately favorable towards large corporate developers. While acknowledging their ability to deliver affordable housing due to economies of scale and access to competitive financing, I believe the policy would benefit from greater clarity and explicitly stating affordable housing needs to be provided for. Specifically, I recommend explicitly stating the minimum unit threshold at which developers are required to provide an affordable housing contribution. Furthermore, given the infrastructure and scale of larger developments, it would be beneficial to prioritise partnerships with social housing providers at an early stage.	Specifically, I recommend explicitly stating the minimum unit threshold at which developers are required to provide an affordable housing contribution. Furthermore, given the infrastructure and scale of larger developments, it would be beneficial to prioritise partnerships with social housing providers at an early stage.	Comment Noted. As identified in Supporting Text paragraph 17.63, Policy LP30 aligns with the definition set out in Part B1 to London Plan Policy H11 which sets a minimum size of 50 units to be considered Build to Rent. The minimum development size for Policy LP30 to be relevant to a proposal, and subsequently for the affordable housing requirements of the policy to apply, would therefore be 50 units. Developments of fewer than 50 units may still be subject to affordable housing requirements under other policies within the Local Plan, including Policy LP23.

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184	Mr Peter Carpenter [See also Row 101, 134, 152 and 203]	LP30	Y	N	Y	Justified, Effective	The requirement to provide 70% of affordable housing as social rent is too onerous, it should be reduced to 50%. The result of such a high requirement from the lowest rent from of housing will simply make man development uneconomic as so result in a reduction, rather than an increase in socially rented housing. Reduce the proportion of socially rented housing from 70% to 50%.	Reduce the proportion of socially rented housing from 70% to 50%.	Comment Noted. The Council has prepared supporting evidence including a Housing Needs Assessment, Whole Plan Viability Assessment and a Housing Background Paper where the justification for the policy approach can be found. The Housing Needs Assessment identifies that the Borough has an exceptionally high need for social rented housing, a large proportion of which already exists. The Council considers that this evidence base demonstrates that a majority of likely development types coming forward in the Borough would be viable under the policy proposals, with the affordable housing requirements subject to the provisions of the Viability Tested Route set out in Policy LP23. As a result, the Council considers there to be no likelihood of the proposed policy having a materially negative impact on local housing supply. Further justification for the policy approach can be found in the Housing Background Paper.
185	Mr Charles Glover-Short obo Southern Housing [See also Row 104, 135, 166, 194 and 201]	LP30	Y	Y	Y		We support the principle of this policy. We also welcome the reference to separate cores for rented units at point 1a and in the supporting text at paragraph 16.65.		Support Noted.
186	Raffaele Sava [See also Row 9, 109, 136, 153, 167, and 195]	LP30					The proposed policy changes are positive in encouraging long-term affordability in Build-to-Rent developments. However, I recommend that: • More emphasis is placed on rent controls to prevent excessive rent increases. • Tenant protections, such as longer tenancy agreements, are strengthened.	• More emphasis is placed on rent controls to prevent excessive rent increases. • Tenant protections, such as longer tenancy agreements, are strengthened.	Comments Noted. These matters are largely outside the scope of planning policies.
187	Andrew Catto obo the Putney Society [See also Row 26, 110, 137, 154, 168, and 196]	LP30					LP30 - Build to Rent. History shows us that homes built for one tenure often change later to another. Locally there are thousands of examples of once rented homes later sold, and of once owner occupied homes now rented out. Cut out this whole section and treat these as you would any other block of the same size.	Cut out this whole section and treat these as you would any other block of the same size.	Comments Noted. Removing the Build to Rent policy is not considered to be a suitable alternative approach as it is a distinct housing product which has specific requirements that may not be adequately covered by other housing policies within the Local Plan. Having a local policy also provides an opportunity to complement the requirements of London Plan Policy H11.
188	Maurice Mcleod (Wandsworth Council)	LP30	Y	Y	Y		I support this policy		Support Noted.

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	[See also Row 113, 138, 155, 169 and 202]								
189	<p>Leonie Charmes</p> <p>[See also Row 115, 139, 156, 170 and 197]</p>	LP30	N	N	N	<p>Positively prepared; justified; effective; consistent with national policy</p>	<p>This policy is paternalistic, anti-choice, and anti-affordability. It protects a privileged few at the expense of young people and renters who just want a fair shot at housing. Instead of enabling new homes, Wandsworth is erecting bureaucratic barriers that will ensure fewer rental properties are built, driving up costs and entrenching inequality. It treats housing as a privilege, not a right. By forcing build to rent developments to meet the same unaffordable LP23 requirements, the council is actively discouraging investment in rental homes. The result is predictable: fewer homes, higher rents, and more young people forced out of Wandsworth entirely. The separate cores and blocks rule is classist nonsense. The idea that social tenants must be physically segregated shows an aristocratic, outdated view of housing. Instead of integrating communities, it reinforces a system where a lucky few win the housing lottery while everyone else is priced out. The off-site and financial contribution requirements are just a tax on renters. The council is trying to extract money from developments until they are no longer viable, ensuring that only a handful of homes ever get built. Viability testing is a bureaucratic trap. Any development that can't jump through these impossible hoops gets stuck in endless "reviews" meaning projects get delayed or scrapped entirely. Meanwhile, demand keeps rising, and prices keep going up. The rigid dwelling mix rules show that the council thinks it knows better than renters themselves. People should be free to choose what type of housing works for them. Instead, the council is micromanaging private investment, ensuring supply remains stagnant and young people are shut out. In summary, it fails on all counts: -</p> <p>Not positively prepared " Instead of expanding rental housing, this policy restricts supply, ensuring that fewer homes get built. It prioritizes the interests of existing property owners over the needs of renters and young people who are already struggling to find affordable housing. A positively prepared plan would increase housing options, not regulate them out of existence. -</p> <p>Not justified - There is no evidence that these excessive restrictions improve affordability. Segregating social tenants into separate blocks is an aristocratic, outdated approach that entrenches inequality rather than addressing it. Taxing build to rent projects through excessive affordability requirements only makes these developments financially unviable, ensuring they don't get built at all.</p> <p>Not effective - If the goal is to make housing more affordable, this policy does the opposite. By making it harder to build rental homes, Wandsworth is guaranteeing higher rents and more displacement of young people and lower-income residents.</p> <p>- Not consistent with national policy - The National Planning Policy Framework (NPPF) supports increasing housing supply, ensuring flexibility, and reducing unnecessary barriers to development. This policy contradicts those principles by imposing unnecessary financial</p>	<p>Stop treating rental housing as something that needs to be regulated into oblivion. Housing should be built where there is demand, not subjected to arbitrary quotas. Get rid of the separate core/block rule. This is a patronizing, top-down dictate that reinforces social divisions instead of solving them. Allow developers to build what people actually want, instead of forcing an outdated vision of housing on a city that desperately needs more homes. Make viability testing the exception, not the rule. Developers should not have to prove over and over again that their projects make sense.</p>	<p>Comments Noted.</p> <p>The Council has prepared supporting evidence including a Housing Needs Assessment, Whole Plan Viability Assessment and a Housing Background Paper where the justification for the policy approach can be found. The Housing Needs Assessment identifies that the Borough has an exceptionally high need for social rented housing, a large proportion of which already exists. The Housing Needs Assessment also identifies that forms of intermediate housing, including Discounted Market Rent fail to meet the needs of a majority of the Borough's residents. The Council considers that Discounted Market Rent should be resisted where there are feasible opportunities to instead deliver more affordable tenures. This approach is already included in the adopted Wandsworth Local Plan (2023-2038) Build to Rent policy and is specifically allowed for in the London Plan at supporting paragraph 4.11.10.</p> <p>The requirement for a separate core or block is not related to segregation of the residents of different tenures but rather a recognition that the management of Build to Rent developments is typically unitary and that it will often be impractical for separately managed social rented housing to be included within the same building. Delivering the social rented housing in a separate core or block allows for separation of management.</p> <p>The Council considers that this evidence base demonstrates that a majority of likely development types coming forward in the Borough would be viable under the policy proposals with the typologies including a range of scheme sizes above 50 units, the bulk of which far exceed 50 units (including schemes of between 75 and 1750 units). The affordable housing requirements are also subject to the provisions of the Viability Tested Route set out in Policy LP23. Further justification for the policy approach can be found in the Housing Background Paper.</p>

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							<p>burdens and bureaucratic hurdles that prevent homes from being built.</p> <p>Stop treating rental housing as something that needs to be regulated into oblivion. Housing should be built where there is demand, not subjected to arbitrary quotas. Get rid of the separate core/block rule. This is a patronizing, top-down dictate that reinforces social divisions instead of solving them. Allow developers to build what people actually want, instead of forcing an outdated vision of housing on a city that desperately needs more homes. Make viability testing the exception, not the rule. Developers should not have to prove over and over again that their projects make sense.</p>		
190	Jamie Banks [See also Row 117, 141 and 171]	LP30	N	N	N	Positively prepared, Justified, Effective, Consistent with national policy	<p>Struggling to work out if you are morons, or purposely introducing aristocratic anti-housing policies under stealth. I would almost have more respect if you were truly self interested and representing the views of your richest inhabitants, bourgeoisie land owners, but all but preventing any new development. However I sense you are actually well intentioned, and just incredibly dim. I wonder if any of you have taken even a first year economics course?</p>	<p>Struggling to work out if you are morons, or purposely introducing aristocratic anti-housing policies under stealth. I would almost have more respect if you were truly self interested and representing the views of your richest inhabitants, bourgeoisie land owners, but all but preventing any new development. However I sense you are actually well intentioned, and just incredibly dim. I wonder if any of you have taken even a first year economics course?</p>	<p>Comment Noted. The Council has prepared supporting evidence including a Whole Plan Viability Assessment and a Housing Background Paper where the justification for the policy approach can be found.</p>
LP31 – Specialist Housing for Vulnerable and Older People									
191	Ms Tamara Flanagan [See also Row 129, 160 and 175]	LP31	Y	Y	Y		I fully support Wandsworth Council's proposed policy on Specialist Housing for vulnerable and older people.		Support Noted.
192	Battersea Society [See also Row 111, 131, 151, 163, and 181]	LP31					<p>LP 31. Housing for Vulnerable and Older People</p> <p>We support the changes to the existing policy to make it compatible with Policy LP 23. We suggest, however, that the policy should make clear that the Council will support redevelopment of existing housing for vulnerable and older people that will provide enhanced and/or additional dwellings.</p>		<p>Comment Noted.</p> <p>The Council has recommended a potential modification for the Inspector to consider which would amend Part A and the supporting text to more clearly identify how alternative forms of housing will be considered as replacements for specialist housing.</p>
193	Bill Majrowski [See also Row 3]	LP31					<p>At least 20% of social housing should be fully accessible by design for disabled and elderly people including fully step free access with no trip hazards, provision of wheelchair accessible shower rooms instead of baths, and provision of wide access doors and internal spaces to allow easy wheelchair access. For people with severe visual impairment like myself good natural illumination is an essential part of sustainable housing design.</p>	<p>At least 20% of social housing should be fully accessible by design for disabled and elderly people including fully step free access with no trip hazards, provision of wheelchair accessible shower rooms instead of baths, and provision of wide access doors and internal spaces to allow easy wheelchair access. For people with severe visual impairment like myself good natural</p>	<p>Comment Noted.</p> <p>Policy D7 of the London Plan sets out requirements for accessible housing, including that all dwellings must meet Building Regulation requirement M4(2) and at least 10% of dwellings must meet Building Regulations Requirement M4(3) (wheelchair user dwellings). The Council is aware that developers of social housing may also voluntarily exceed the M4(3) threshold. At this time, the Council has not identified a need to strengthen these policy requirements further however</p>

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194	Mr Charles Glover-Short obo Southern Housing [See also Row 104, 135, 166, 185, and 201]	LP31	Y	Y	Y		The text within the second sentence of point A.2 currently states "Where the loss existing"• , we believe this should be "Where the loss of existing"• . While we support the principle of this policy, we note that little guidance has been provided regarding how to demonstrate that an existing property is no longer viable (Point A.1). It may be beneficial to provide guidance regarding viability e.g. marketing duration (12 months).	The text within the second sentence of point A.2 currently states "Where the loss existing"• , we believe this should be "Where the loss of existing"• . While we support the principle of this policy, we note that little guidance has been provided regarding how to demonstrate that an existing property is no longer viable (Point A.1). It may be beneficial to provide guidance regarding viability e.g. marketing duration (12 months).	Comment Noted. The Council has recommended a potential modification for the Inspector to consider to add the missing word "of" in the text of Point A.2. The Council has not sought to prescriptively define how an applicant should demonstrate that there is no longer an identified need for the retention of the accommodation. Whilst marketing evidence will typically be required in instances where there is a viability reason, the provisions of Part A.1. would not exclusively relate to viability and could relate to wider changes in demand.
195	Raffaele Sava [See also Row 9, 109, 136, 153, 167, and 186]	LP31					I fully support efforts to provide more housing for elderly and vulnerable residents. To improve the policy further, I recommend: • Ensuring wheelchair-accessible housing is included in all new developments. • Prioritizing locations with good transport links and proximity to healthcare facilities.	To improve the policy further, I recommend: • Ensuring wheelchair-accessible housing is included in all new developments. • Prioritizing locations with good transport links and proximity to healthcare facilities.	Comment Noted. Policy D7 of the London Plan sets out requirements for accessible housing, including that all dwellings must meet Building Regulation requirement M4(2) and at least 10% of dwellings must meet Building Regulations Requirement M4(3) (wheelchair user dwellings). The Council agrees with the principle of the second suggestion but considers that other policies within the Local Plan adequately address the suitability of development locations and access to services.
196	Andrew Catto obo the Putney Society [See also Row 26, 110, 137, 154, 168, 187]	LP31					LP 31 – Vulnerable and Older People. No specific comment.		Comment Noted.

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197	<p>Leonie Charmes</p> <p>[See also Row 115, 139, 156, 170, and 189]</p>	LP31	N	N	N	<p>Positively prepared, Justified, Effective, Consistent with national policy</p>	<p>This policy is well-intentioned but ultimately too rigid, making it harder to provide specialist housing that adapts to changing needs. Protecting existing stock is reasonable in principle, but the way this policy is structured risks trapping outdated, unsuitable housing in place while discouraging new development. Relax the "no net loss" requirement. Instead of a rigid ban on reducing specialist housing, allow redevelopment or conversion where it demonstrably leads to better housing outcomes. Some older stock is no longer fit for purpose, and restricting change limits opportunities for improvement.</p> <p>Streamline approval for new specialist housing " Remove the excessive requirement to "robustly demonstrate" an identified need. Developers and care providers respond to demand"forcing an additional bureaucratic hurdle only slows down delivery. Ensure flexibility for future housing needs " The policy should explicitly allow for reconfiguration, adaptation, or conversion of specialist housing in response to shifting demographics, advances in care models, and evolving local priorities. Exempt specialist housing from LP23 affordability requirements - Specialist housing already serves vulnerable populations, often with higher operating costs than standard housing. Forcing additional affordability contributions makes projects financially unviable, reducing overall provision.</p>	<p>Relax the "no net loss" requirement -Instead of a rigid ban on reducing specialist housing, allow redevelopment or conversion where it demonstrably leads to better housing outcomes. Some older stock is no longer fit for purpose, and restricting change limits opportunities for improvement. Streamline approval for new specialist housing -Remove the excessive requirement to "robustly demonstrate" an identified need. Developers and care providers respond to demand"forcing an additional bureaucratic hurdle only slows down delivery. Exempt specialist housing from LP23 affordability requirements -Specialist housing already serves vulnerable populations, often with higher operating costs than standard housing. Forcing additional affordability contributions makes projects financially unviable, reducing overall provision. Ensure flexibility for future housing needs -The policy should explicitly allow for reconfiguration, adaptation, or conversion of specialist housing in response to shifting demographics, advances in care models, and evolving local priorities.</p>	<p>Comments Noted.</p> <p>Policy LP31 provides flexibility for operators of specialist housing to repurpose or redevelop housing where there is either no need for the ongoing operation of the housing or the housing can be reprovided elsewhere. The "no net loss" provision within the policy only applies where the applicant has not otherwise demonstrated there is no longer a need for the specialist housing and helps to ensure specialist housing stock is not lost without justification. The Council does not consider the requirements of the policy to be rigid in this regard.</p> <p>Part B of Policy LP31 is not subject to any changes as part of the Local Plan Partial Review and remains the version found sound and adopted in July 2023. The purpose of Part B1 is not to create a barrier to the delivery of specialist or supported housing but rather to ensure that the specific type of specialist or supported housing proposed relates to an identified need at the time of the assessment.</p> <p>Exempting specialist housing from affordable housing requirements is not considered to be a reasonable alternative. It would result in the delivery of less affordable housing, including less specialist affordable housing, for which there is a proven high level of need identified in the Housing Needs Assessment (2024) and would be inconsistent with the London Plan. Specialist housing developments which cannot viably provide affordable housing benefit from the same Viability Tested Route set out in Policy LP23.</p>
198	<p>Lucinda Turner obo Greater London Authority</p> <p>[See also Row 52, 149, 172 and 180]</p>	LP31				<p>Specialist and Older Persons Housing</p> <p>Draft Policy LP31 seeks to protect existing specialist and supported housing where it is considered suitable for its use and sets out the criteria that needs to be addressed should it be proposed to be redeveloped or re-purposed. While that is welcomed, the draft Plan should establish what the need is for specialist older persons housing. In the absence of a figure of need, LBW should rely on the Mayor's indicative benchmark figure which is set out in Table 4.3 of the LP2021 for the delivery of 120 new homes a year. In accordance with Policy H13 of the LP2021 and in order to meet identified need, LBW should work in collaboration with providers to identify sites which may be suitable for specialist older persons housing.</p>	<p>In the absence of a figure of need, LBW should rely on the Mayor's indicative benchmark figure which is set out in Table 4.3 of the LP2021 for the delivery of 120 new homes a year. In accordance with Policy H13 of the LP2021 and in order to meet identified need, LBW should work in collaboration with providers to identify sites which may be suitable for specialist older persons housing</p>	<p>Comments Noted.</p> <p>The Council recognises the London Plan Borough-level target of 120 new units per annum. The Council 's policy makes reference at Paragraph 17.70 to the London Plan's benchmark target for older person's housing and makes clear that this should be considered in the context of more detailed local assessments of specific types of need.</p>	

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199	James Stevens obo Home Builders Federation [See also Row 40, 46 and 125]	LP31		N		Effective	<p>Policy LP31: Specialist housing for vulnerable people and older people</p> <p><u>The draft policy is unsound because it is ineffective.</u></p> <p>Paragraph 17.68 states that the policy responds to London Plan policies H12 and H13. London Plan policy H13 establishes benchmark indicative targets for the provision of housing for older people. These are for the period 2017-2029. As the assessment of housing needs in general (London Plan policy H1), these benchmark targets are based on an assessment of need undertaken by the GLA for London as a whole (as a single housing market area). The indicative target for Wandsworth is for 120 units of older persons housing per year. This is set out in table 4.3 which supports policy H13.</p> <p>Supporting paragraph 4.13.4 explains the type of accommodation this policy is designed to support. It is clear that the aim of this policy is not to be confused with care-home accommodation. It is for specialise retirement homes for older people. The supporting text states:</p> <p>This policy contains requirements for 'specialist older person housing'. It does not apply to accommodation that has the following attributes, which is considered 'care home accommodation':</p> <ul style="list-style-type: none"> • personal care and accommodation are provided together as a package with no clear separation between the two • the person using the service cannot choose to receive personal care from another provider • people using the service do not hold occupancy agreements such as tenancy agreements, licensing agreements, licences to occupy premises, or leasehold agreements or a freehold • likely CQC-regulated activity will be 'accommodation for persons who require nursing or personal care' <p>Wandsworth's draft policy does not refer to the benchmark target for Wandsworth, but it needs to do so to be effective and in conformity with the London Plan.</p> <p><u>Part B is unsound</u> because it requires the applicant to demonstrate the need for this type of housing. This is unnecessary, because the GLA, through the London Plan, has conducted this assessment. The Council should not dispute the need.</p> <p>We recommend that the policy is amended to reflect the aims of the London Plan and to refer to the benchmark target for Wandsworth.</p>	<p>Wandsworth's draft policy does not refer to the benchmark target for Wandsworth, but it needs to do so to be effective and in conformity with the London Plan.</p> <p>We recommend that the policy is amended to reflect the aims of the London Plan and to refer to the benchmark target for Wandsworth.</p>	<p>Comments Noted.</p> <p>The Council recognises the London Plan Borough-level target of 120 new units per annum. The Council 's policy makes reference at Paragraph 17.70 to the London Plan's benchmark target for older person's housing and makes clear that this should be considered in the context of more detailed local assessments of specific types of need.</p> <p>Part B of Policy LP31 is not subject to any changes as part of the Local Plan Partial Review and remains the version found sound and adopted in July 2023. The purpose of Part B1 is not to create a barrier to the delivery of specialist or supported housing but rather to ensure that the specific type of specialist or supported housing proposed relates to an identified need at the time of the assessment.</p>

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200	Joseph Hickling obo George Potter House of Battersea [See also Row 42 and 144]	LP31		N		Positively prepared; justified; effective; consistent with national policy	<p>[See Response in Row 144] Identifying Sites for Development</p> <p>2.9 In the context of Draft Policy LP31, it is notable that the policy wording has not been updated to reflect London Policy H13 Part A (Specialist Older Persons Housing) which states that "Boroughs should work positively and collaboratively with providers to identify sites which may be suitable for specialist older persons housing...".</p> <p>2.10 As noted above, the Wandsworth Housing Needs Assessment 2024 sets out a significant projected increase in local need for Specialist Housing for Older People at 4,966 units over the plan period. However, no specific amendments are proposed to be made to the draft wording of Policy LP31 to identify sites which may be suitable for specialist older persons housing.</p> <p>2.11 GPHoB strongly encourages the Council to reconsider the unjustified decision to neglect consideration of allocating sites to deliver specialist housing to meet the identified needs of a specific group within the community, as required by the NPPF and PPG. In particular, GPHoB recommends that the Council allocate specific sites or at least identify specific requirements within Policy LP31 to assist in meeting the identified need for retirement housing, housing with care, and care homes.</p> <p>2.12 In this respect, the National Planning Policy Framework ('NPPF') at paragraph 63 is clear that: "Within this context of establishing need, the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies. These groups should include (but are not limited to)...older people (including those who require retirement housing, housing with-care and care homes)...".</p> <p>2.13 Furthermore, Planning Practice Guidance ('PPG') is clear that 'it is up to the plan-making body to decide whether to allocate sites for specialist housing for older people'. However, PPG provides that "allocating sites can provide greater certainty for developers and encourage the provision of sites in suitable locations. This may be appropriate where there is an identified unmet need for specialist housing" (Paragraph: 013 Reference ID: 63-01320190626).</p> <p>2.14 Consequently, GPHoB considers that for the WLPPR to be considered sound, Draft Policy LP31 must include consideration of a requirement specifically to meet the needs of specialist accommodation, including affordable housing, as part of an effective, positively prepared and justified approach. In neglecting to consider the allocation of sites to meet these identified needs, the draft plan leaves the direction of specialist accommodation to chance, relying on speculative planning applications coming forward within the plan period.</p>	<p>Consequently, GPHoB considers that for the WLPPR to be considered sound, Draft Policy LP31 must include consideration of a requirement specifically to meet the needs of specialist accommodation, including affordable housing, as part of an effective, positively prepared and justified approach. In neglecting to consider the allocation of sites to meet these identified needs, the draft plan leaves the direction of specialist accommodation to chance, relying on speculative planning applications coming forward within the plan period.</p> <p>In this context, the policy wording should be amended to reduce ambiguity surrounding how such requirements for priority housing needs would be delivered. For example, rather than simply state 'contribute' the text could be updated to state that priority housing need should only be delivered on site where practicable or feasible</p>	<p>Comments Noted.</p> <p>The Council recognises the London Plan Borough-level target of 120 new units per annum. The Council 's policy makes reference at Paragraph 17.70 to the London Plan's benchmark target for older person's housing and makes clear that this should be considered in the context of more detailed local assessments of specific types of need.</p> <p>At this time, the site allocations contained within the Wandsworth Local Plan (2023-2038) are considered to provide sufficient breadth and flexibility such that they do not preclude or discourage proposals for specialist housing at a scale commensurate with identified need. Since the adoption of the Wandsworth Local Plan (2023-2038), the Council has not identified a further need to allocate specific sites for specialist housing within site allocations. The performance of the Council's housing policies will continue to be monitored and appropriate action can be taken as part of any subsequent plan review.</p> <p>The Council has recommended a potential modification for the Inspector to consider which would amend Part A and the supporting text to more clearly identify how alternative forms of housing will be considered as replacements for specialist housing.</p> <p>In relation to affordable housing, the specific requirements for specialist older persons' housing have been reflected in the Whole Plan Viability Assessment. Further information is also included in the Housing Background Paper. In relation to viability, where there are circumstances which mean that it is not possible for a proposed specialist housing development to meet the full affordable housing requirements (including conceivably because there are significant costs associated with achieving regulatory compliance), developments would still have a clear route to permission through the Viability Tested Route provisions within Policy LP23.</p>

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							<p>Re-Use of Specialist Housing for Vulnerable People</p> <p>2.15 Draft Policy LP31 includes new proposed text, as follows: "Where the loss existing specialist and supported housing is proposed and satisfies the requirements of Part A, proposals for re-use or re-development of this housing will be supported where they would contribute to meeting another priority housing need (including social rent)"</p> <p>2.16 As currently worded, the policy is unspecific and therefore ambiguous. The Partial Local Plan Update includes no definition of 'Priority Housing'. It is therefore unclear if the requirement to contribute to such a provision is feasible or viable. For the policy to be justified and effective, a definition of 'Priority Housing' must be set out.</p> <p>2.17 On the matter of viability, the policy has not been assessed from a viability standpoint in the Wandsworth Housing Needs Assessment 2024. There will be circumstances in the borough where existing Specialist Housing for Older People developments need to be redeveloped to ensure ongoing compliance with modern Care Quality Commission (CQC) expectations and therefore ensure the long term viability of the operator will be futureproofed. By virtue, such developments will promote inclusivity and accessibility to those who need a specialist older persons community within the borough.</p> <p>2.18 Funding such upgrades at existing sites is achievable by diversifying existing facilities and providing an additional quantum of development such as through market housing and mixed-use development. Given that 'Priority Housing Need' is undefined and not viability tested, it is unclear whether such upgrades would be viable or feasible.</p> <p>2.19 Feasibility is often an issue in the context of practicality. In Specialist Accommodation for Older Persons development's, it is generally accepted that on many IRC's, there are practical difficulties of providing affordable housing on site for operational purposes such as liability to service charges. Furthermore, CQC requirements on the owner and a duty of care to existing residents, particularly in relation to Care Homes and access on sites to an</p> <p>2.20 affordable housing providers residents raises welfare and safeguarding issues. As such, it is sometimes not possible to deliver affordable housing on site and rather affordable housing contributions are more suitable.</p> <p>2.21 In this context, the policy wording should be amended to reduce ambiguity surrounding how such requirements for priority housing needs would be delivered. For example, rather than simply state 'contribute' the text could be updated to state that priority housing need should only be delivered on site where practicable or feasible.</p> <p>3. CONCLUSION</p> <p>3.1 These representations have been prepared on behalf of George Potter House of</p>		

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							<p>Battersea. They consider the Wandsworth Local Plan Partial Review: Regulation 19 consultation and the Evidence Base documents in relation to George Potter House, Battersea High Street.</p> <p>3.2 These representations provide comment on policies included within the Draft Plan.</p> <p>3.3 GPHoB are supportive of the Partial Local Plan Review in principle. However, it is noted that draft policies LP23 and LP31 can be further refined to comply with the NPPF, PPG and ensure that the requirements are achievable and justified. This will be necessary to ensure that the new Local Plan meets the tests of soundness when it is submitted for examination.</p> <p>3.4 We ask to be kept informed of the progress with the emerging Local Plan and look forward to further opportunities to engage with Wandsworth Council in respect of these representations.</p>		
Other Wording Changes									
201	Mr Charles Glover-Short obo Southern Housing [See also Row 104, 135, 166, 185 and 194]	Other Wording	Y	Y	Y		We welcome the inclusion of the amendments to paragraphs 2.81 and 2.82 regarding housing and affordable housing.		Support Noted.
202	Maurice Mcleod (Wandsworth Council) [See also Row 113, 138, 155, 169 and 188]	Other Wording	Y	Y	Y		I agree		Support Noted.
203	Mr Peter Carpenter [See also Row 101, 134, 152 and 184]	Other Wording	Y	Y	Y				Support Noted
204	Miss Rosalind Graham hunt [See also Row 8]	Other Wording	Y	Y	Y		We need more mobility/wheelchair flats		Support Noted

