

# GREATER LONDON AUTHORITY

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**Department: Planning**  
Our reference: LDF32 /LDD02/LP02/AT01

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Email: bankssolutionsuk@gmail.com

Dear Charlotte,

**Re: Wandsworth Local Plan Partial Review Examination Response to the Inspectors' Matters, Issues and Questions.**

Thank you for inviting written statements in advance of the London Borough of Wandsworth's (LBW) Local Plan Examination in Public hearing sessions. The appended statements respond to the Inspector's Matters, Issues and Questions published in September 2025 (ref: ID-002) and address the relevant questions raised.

Please read this statement in conjunction with the Mayor's response to the Regulation 19 consultation in February 2025 where he raised a general conformity objection regarding the proposed approach to affordable housing as set out in Policy LP23 of the Wandsworth Local Plan Partial Review ("WLPPR") (LBW Ref: SD001). Without necessary amendments to the policies as discussed below and as currently written, the draft WLPPR continues to not be in general conformity with the London Plan.

If you have any specific questions in relation to this Statement, please contact David Nip at [david.nip@london.gov.uk](mailto:david.nip@london.gov.uk)

Yours sincerely



Karen Montgomerie  
**Team Leader Strategic Planning (Local Plans)**

Cc: James Small-Edwards, Chair of London Assembly Planning Committee  
Leonie Cooper, London Assembly Constituency Member  
National Planning Casework Unit, MHCLG

## **Matter 1: Legal Requirements and Overarching Issues**

### **London Plan**

#### **Is the WLPPR in 'general conformity' with the London Plan as required by the provisions of Section 24 of the 2004 Act??**

The Development Plan Documents prepared by London boroughs must be in general conformity with the Spatial Development Strategy for London (referred to as the London Plan), in accordance with Section 24 of the Planning and Compulsory Purchase Act 2004 (as amended). The current London Plan was published on 2 March 2021, and now forms part of LBW's Development Plan and alongside with the borough's adopted Local Plan, it contains the most up-to-date policies.

In his Local Plan Regulation 19 response, the Mayor made it clear that, as currently written, it was his opinion that the draft WLPPR was not in general conformity with the London Plan, particularly regarding the proposed approach to affordable housing and review mechanisms, and its failure to reflect the Threshold Approach as set out in London Plan Policy H5.

Since the Regulation 19 consultation, LBW have proposed a number of modifications to the WLPPR, however, the overall policy position and approach on affordable housing have not changed. The Mayor considers that this remains a significant issue and that the WLPPR continues not to be in general conformity with the London Plan.

If there are further proposed modifications to the draft WLPPR and subsequent consultations in the future, the Mayor would review and provide his opinion on the general conformity of the WLPPR at that time.

**Matter 2: Policy 23 - Affordable Housing**

**Are the requirements for Affordable Housing set out in Policy LP23 justified by appropriate available evidence, having regard to national guidance, and local context, and is it in 'general conformity' with the London Plan?**

As set out in LBW's Housing Background Paper (ref: SD013), it is acknowledged that the borough has great affordable housing need and GLA officers do not object to the Council's objective in seeking to maximise affordable housing delivery through the planning system.

GLA officers do not have any concerns in respect to the adoption of the 50% strategic target set out in Policy LP23 Part A, which is in line with London Plan Policy H4. As set out above, our main concern is the proposed 45% affordable housing threshold for private, non-industrial land as set out in Policy LP23 Part D, is inconsistent with Policy H5 Part B (1) of the London Plan.

The Council relies on identified housing needs, the whole plan viability assessment (ref:SD022), and the additional viability information (ref: SD043) as evidence base for the proposed 45% threshold. GLA officers have reviewed the evidence and found that the majority of the scenarios tested in the viability assessment, including the additional site testing dated September 2025 appear to be unviable with 45% affordable housing for private, non-industrial land.

Apart from the viability information submitted by LBW, GLA officers have also had regard to the Council's previous approval figures. Table 3 of LBW's Housing Background Paper indicates that 18-34% on-site affordable housing has been secured by the borough for every year over the period of 2019-24. It is worth noting that the data measures schemes on private, non-industrial land as well as including schemes on public and industrial land, which are subject to a 50% threshold under the London Plan. When factoring off-site or financial contributions secured, the level of affordable housing slightly rises to 19-36% between 2019-24.

GLA officers have reviewed the Planning London Datahub and Table 1 below illustrates the levels of affordable housing delivery achieved by the unit in the Borough over the last five years. Again, it is important to note that the figures above include both public and industrial land schemes, which are subject to a 50% affordable housing threshold.

*Table 1 Level of Affordable Housing Delivery by Unit, London Borough of Wandsworth*

Year	Total Units	Open Market Units		Affordable Units	
		Units	%	Units	%
2020/21	4,836	3900	80.6%	936	19.4%
2021/22	4,518	3715	82.2%	803	17.8%
2022/23	2,297	1792	78.0%	505	22.0%
2023/24	744	487	65.5%	257	34.5%
2024/25	2,237	1635	73.1%	602	26.9%

GLA officers requested further information on the affordable housing approvals for major developments over the last five years for schemes on private, non-industrial land, so that GLA officers could further consider whether the proposed 45% threshold is deliverable and is realistic, when considered alongside the Local Plan Viability Assessment.

LBW officers responded with a number of major schemes on non-industrial or publicly owned land, as specified within the Housing Background paper, including 120 Battersea Bridge Road (LBW ref: 2021/1677), which secured 38% onsite affordable housing (36% by hab room). GLA officers have reviewed the application and noted that the scheme did not secure any social rent housing and the affordable units are all intermediate.

Another case which LBW officers highlighted was B&Q Depot Smugglers Way (LBW ref 2019/4583), which secured 36% by hab room. GLA officers noted that this scheme secured only 30% low cost rent units and 70% intermediate units, which is the inverse of the council's proposed tenure mix requirements.

LBW officers have provided a list of approved schemes on private, non-industrial land to support the proposed 45% threshold. GLA officers have carried out further analysis on the Council's previous approvals and noted that majority of the affordable units secured are intermediate housing (see final column of Table 2 below).

It is accepted that the approvals included in Table 2 are on private, non-industrial land except 2 Shuttleworth Road which was partly owned and now fully acquired by the Council. Nonetheless, it is noticed that majority of the approved schemes in Table 2 contain either only or predominately intermediate units. If the affordable housing contributions in the approved schemes had been delivered in line with the proposed 70/30 tenure mix in favour of social rent, the overall affordable housing level secured would have been considerably lower, as low cost rented housing (e.g. social rent) is a more affordable tenure that attracts a lower sales value and requires a higher amount of development cross subsidy.

Therefore, the Mayor retains his position that the WLPPR, particularly the proposed 45% threshold, is not supported by robust evidence and is not in general conformity with the London Plan.

### **Are the requirements for Affordable Housing set out in Policy LP23 positively prepared 'in a way that is aspirational but deliverable'?**

The current Local Plan was adopted in July 2023, where the 35% affordable housing threshold for private, non-industrial land, was considered sound by the Inspector following the EiP in November 2022.

In the WLPPR, the council is proposing to increase the threshold from 35% to 45% and increase the social rent requirements from 50% to 70% in the proposed affordable housing tenure mix. It is expected that LBW should provide evidence to demonstrate that since the adoption of the current Local Plan, there have been significant changes to economic circumstances which justify the proposed increase in the affordable housing requirements. Otherwise, without robust evidence to support this position, the proposed policies would likely result in more developments being unviable when assessed against the Development Plan.

GLA officers' main concern is that this would undermine the threshold approach sets out in the London Plan policy H5 and would result in more applications following the viability tested route and being subject to site specific viability testing at the application stage. More importantly, this approach would likely result in lower level of affordable housing being delivered overall.

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*Table 2 Affordable Housing Tenure Split of Previous Approvals, London Borough of Wandsworth*

Application	Site Name	Total units	AH Units	AH%	Site Type	AH Tenure Split
2016/5644	Part of Plantation Wharf, York Place, Gartons Way (Plantation Wharf)	127	40	32%	Y (Include) - Office	100% Shared Ownership
2017/0535	Land west of 86-96, Garratt Lane	27	10	37%	Y (Include) - Cleared Land (Car parking)	100% Discounted Market Sale
2017/1874	329-339 & 45-53 Putney Bridge Road & Putney High Street, Putney Bridge Road (The Blades)	123	33	27%	Y (Include) - Mixed use	100% Shared Ownership
2018/0210	Land rear of 4-24, Thrale Road (Land rear of Mitcham Lane)	22	6	27%	Y (Include) - Cleared land	100% Shared Ownership
2018/3709	9, 11 and 19 Osiers Road	168	168	100%	Y (Include) - Office	50:50 LAR/SO
2018/3776	York Road Business Centre, 55-59 Lombard Road	168	60	36%	Y (Include) - Retail/mixed	65:35 LAR/SO
2018/4176	Riverside Business Centre and Former Bingo Hall, Bendon Valley	402	122	30%	Y (Include) - Retail/mixed	53:47 LAR/SO
2018/4664	92 Putney Bridge Road	19	5	26%	Y (Include) - Retail	100% Shared Ownership
2014/6746 (VOC - 2019/0921)	Car Park and Land South of Osiers Road	85	19	22%	Y (Include) - Cleared land	100% Shared Ownership
2019/4583	B and Q Depot, Smugglers Way	554	197	36%	Y (Include) - Retail	30:70 LAR/SO
2019/4841	Balham Club, 7-9 Ramsden Road	26	10	38%	Y (Include) - Community/mixed	100% Shared Ownership
2020/0011	Homebase, Swandon Way	480	159	33%	Y (Include) - Retail	60:40 LAR/SO
2020/0457	25-29 Tooting High Street	29	6	21%	Y (Include) - Retail/mixed	100% Shared Ownership
2020/2369	Battersea Bar/The Chopper, 58-70 York Road	93	38	41%	Y (Include) - Retail	100% Shared Ownership
2021/1677	120 Battersea Bridge Road	24	9	38%	Y (Include) - Community use	100% Shared Ownership
2021/3601	Riverside Business Centre and Former Bingo Hall, Bendon Valley	433	132	30%	Y (Include) - Retail/mixed	56:44 LAR/SO
2022/1694	223 Balham High Road	42	5	12%	Y (Include) - Retail	100% LAR
2023/1310 (Original: 2015/2963, subsequently modified by 2017/0764)	Battersea Park Studios, 2 Shuttleworth Road (131 Battersea High Street)	71	71	100%	Y (Include) - Office/mixed <b>Council-owned land</b>	96:4 LAR/SO (by unit)

**Is the Policy clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?**

Decision makers are expected to determine planning applications in accordance with the Development Plan, unless material considerations indicate otherwise. Contrary to the current Local Plan, which is consistent with Policy H5, the proposed 45% threshold in WLPPR would result in two separate affordable housing requirements as it conflicts with London Plan policy H5.

The Viability section of the PPG sets out that the role for viability assessment is primarily at the plan making stage. GLA officers' view is that the proposed 45% threshold is not robustly supported by evidence and therefore, it would undermine the effectiveness of London Plan Policy H5 and disincentivise applicants from following the FTR.

This approach would run the risk of the affordable housing requirements being unviable for most of the private non-industrial sites within the borough and inevitably at planning application stage, resulting in site-specific financial viability assessments being submitted by applicants to reduce the level of affordable housing which the scheme can provide.

This approach could also result in viability deficits being identified through viability assessments at decision making stage, which could lead to applicants seeking to include deficits within viability review mechanisms which would reduce the effectiveness of the reviews and their ability to provide additional affordable housing.

In practice, where viability testing is required for proposed developments, this serves to slow down the application-stage decision-making process and requires more resources from applicants and LPAs, and also increases the likelihood of further disputes and potential appeals.

**Is the requirement to provide a housing tenure split of 70% social rent and maximum of 30% intermediate by habitable room consistent with national policy and in general conformity with the London Plan? If not, what justification is there for doing so?**

GLA officers consider that the proposed tenure mix, when considering on its own, is in general conformity with the London Plan. However, it is important to note that this tenure mix should be based on the 35% affordable housing threshold for private, non-industrial land. Setting this tenure mix with a 45% threshold is likely to result in majority of the private, non-industrial sites in the borough being unviable and needing to be viability tested at the application stage. Consequently, this undermines the intention of the London Plan Policy H5 and would likely result in lower levels of affordable housing being secured in the borough during the plan period.

As noted in the response above, the Council's previous approvals significantly weighed towards intermediate housing which fails to support the proposed 45% threshold at a tenure mix with 70% social/30% intermediate.

**Will this tenure split deliver an uplift in the level of affordable housing across the borough?**

The proposed tenure split, compared to the adopted Local Plan (2023) of 50/50 split between low-cost rent and intermediate tenures, will likely result in a higher level of social rent housing provision, but may result in an overall lower level of affordable housing across the borough. This

is because the higher social rent requirements would result in more development cross subsidy being required to provide the additional social rent housing, which would result in lower levels of intermediate housing provision as well as the overall level of affordable housing across the scheme.

**What would be the effect of requiring 45% affordable housing on sites using the FTR on the deliverability/viability of such developments?**

GLA officers' concern is that the 45% affordable housing requirement would likely to result in a significant number of development proposals on private, non-industrial land being unviable, which means applicants are more likely to follow the Viability Tested Route and provide lower levels of affordable housing than 45%.

The submitted evidence by LBW does not robustly demonstrate that majority of private, non-industrial sites in the borough can viably provide 45% affordable housing and therefore, the Mayor is concerned that this requirement would adversely affect the deliverability and viability of those developments, and setting the threshold unreasonably high would disincentivise applicants to follow the FTR and London Plan Policy H5.

**Is the requirement to provide 45% affordable housing on sites using the Fast Track Route (FTR) consistent with national policy and in general conformity with the London Plan? If not, what justification is there for doing so?**

The 45% requirements for using the FTR is not in general conformity with the London Plan, specifically Policy H5 Part B (1). As noted in our response above, the Council's previous approvals do not justify the proposed 45% threshold at the 70% social/30% intermediate tenure mix.

Further, the submitted viability information is not robust in demonstrating that majority of the sites would meet this requirement and therefore, the 45% affordable housing requirement is not effective and inconsistent with the London Plan. The 45% requirement would undermine the Threshold Approach as set out in Policy H5 of the London Plan which is a well-established and widely adopted policy across London.

**Is it clear within Policy LP23 when an early, mid or late stage review will, or will not, be required?**

The Policy clearly sets out when early, mid or late-stage review will, or will not be required. As stated in our Reg 19 responses, GLA officers have concerns regarding Policy LP23 part D2, which sets out a requirement for late-stage reviews for developments which follow the FTR. Insisting on a late-stage review for fast tracked applications is not in accordance with London Plan Policy H5 and could further disincentivise applicants from following the FTR. The Council is advised to remove this requirement from the policy and to follow the approach to review mechanisms set out in the London Plan.

**Policy LP23 - Affordable housing requirement on small-scale residential developments**

**Is the wording of Policy LP23 clear about when major and small-scale development is required to contribute towards the provision of affordable housing?**

Regarding major developments, we reiterate our concerns regarding the proposed 45% affordable housing threshold and the requirement of late stage review for schemes following the FTR. No comments regarding small-scale non-major developments.

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## **Matter 4: Policy LP28 - Purpose Built Student Accommodation (PBSA)**

**Are the requirements for PBSA set out in Policy LP28 justified by appropriate available evidence, having regard to national guidance, and local context, and is it in 'general conformity' with the London Plan?**

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 Policy LP23. Whilst the Mayor does not object to the principle of requiring financial contributions towards conventional C3 affordable housing, it should be noted that London Plan 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 London Plan Policy H15.

**Are the requirements for PBSA set out in Policy LP28 positively prepared 'in a way that is aspirational but deliverable'?**

No comments except the concerns raised regarding Policy LP23.

**Is the Policy clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?**

No comments except the concerns raised regarding Policy LP23.

**Does Policy LP28 allow developments to follow the FTR? If not, what justification is there for doing so?**

There should be provision allowing schemes to follow the FTR if they provide affordable student accommodation in line with London Plan Policy H15.

Draft Policy LP28 requires PBSA developments to provide financial contributions towards affordable housing equivalent to Local Plan Policy LP23. Whilst we have no objection to the principle in the Council seeking conventional C3 affordable housing throughout PBSA developments, as stated above, we have concerns regarding the proposed 45% affordable housing requirements as set out in Policy LP23.

**Matter 5: Policy LP29: Housing with Shared Facilities**

**Are the requirements for Housing with Shared Facilities set out in Policy LP29 justified by appropriate available evidence, having regard to national guidance, and local context, and is it in 'general conformity' with the London Plan?**

Draft Policy LP29 requires schemes for housing with shared facilities which do not provide a contribution equivalent to at least 50 per cent of units (at a discount of 50 per cent of the market rent) to be subject to review mechanisms. Whilst GLA officers do not consider this as a general conformity concern, this is not consistent with London Plan Policy H16 which only requires a late stage viability review for schemes providing a contribution less than 35 per cent affordable housing.

**Is the requirement of Policy LP29 to expect 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, consistent with national policy and in 'general conformity' the London Plan? If not, what justification is there for doing so?**

See first response in Matter 5 above.

**Matter 6: Policy LP30: Build to Rent**

**Are the requirements for Build to Rent set out in Policy LP30 justified by appropriate available evidence, having regard to national guidance, and local context, and is it in 'general conformity' with the London Plan?**

Draft Policy LP30 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 intermediate rents.

The draft policy also makes reference to the affordable housing requirements set out in LP23, which we have addressed in response to Matter 2 as in why we consider that is not in general conformity with the London Plan.

**Are the requirements for Build to Rent set out in Policy LP30 positively prepared 'in a way that is aspirational but deliverable'?**

GLA officers are concerned that majority of Build to Rent developments on private, non-industrial land, which is subject to the affordable housing requirements in LP23, would not be viable with the 45% affordable housing requirements (as set out in response to Matter 2 above). Therefore, the requirements of this policy are not considered to be deliverable.

**Is the Policy clearly defined and unambiguous so that it is evident how a decision maker should react to development proposals?**

No comments except the concerns raised regarding Policy LP23.