

GLA Consultation on ‘Supporting Housebuilding in London LPG’ – December 2025

Wandsworth Council Response

Part One: Cycle Standards

Question 1: Are the proposed changes to the cycle parking standards, in conjunction with the wider package proposed by this consultation, likely to make a material difference to the viability of residential schemes while still providing sufficient cycle parking to enable sustainable growth in London and mode shift?

The Council would emphasise the importance of ensuring that new developments are designed in such a way that enables their occupiers to own and park bicycles close to their homes and jobs. The [London Travel Demand Survey](#) shows that Wandsworth experiences much higher rates of cycling in terms of mode share than many other London boroughs. A range of national, regional and local strategies, including the Wandsworth Walking and Cycling Strategy (2022-2030)¹ highlight the importance of facilitating the continued transition towards active and sustainable transport modes in the interests of the multi-functional benefits that active travel provides, including the healthier lifestyles, lower levels of vehicular traffic, less noise, better air quality, and less measurable, but nevertheless important, improvements to the character and safety of local neighbourhoods.

As part of the proposed LPG, it is proposed that current cycle parking standards set out in the London Plan will be temporarily replaced with a set of reduced standards, which will vary between boroughs according to their assigned pre-banding. Despite the broader points raised elsewhere, the Council is pleased to be allocated to Band 1, ensuring that the highest standards remain in effect for Wandsworth.

The use of minimum standards for cycle parking is considered by the Council to be useful for ensuring that new developments adequately encourage and facilitate active travel choices. Evidently, where developments come forward that have inadequate facilities for parking cycles, the tendency for those living there to use a bicycle will be lower. Nonetheless, in line with some of the rationale set out in the consultation, the Council also recognises that cycle ownership is changing and that an increasing proportion of those who cycle choose to hire a bicycle (although they may still own a bicycle in addition) and, anecdotally, we note some developments have been built with an obvious surplus of parking spaces. The principle of reviewing cycle standards to

¹ [Wandsworth Walking and Cycling Strategy 2022-2030](#)

consider whether slightly more flexibility is justified in certain circumstances is therefore considered sensible.

The Council welcomes the recognition that any standard is a minimum, and should not be seen as a quota or a cap. As part of decision-making, the Council will still be responsible for ensuring that any cycle parking proposals are appropriate, in terms of quantity, quality and siting.

With respect to the specific proposals, the Council acknowledges the need for measures to support housebuilding and recognises that a small reduction in cycle parking standards may have a marginally positive impact on viability in some cases. However it considers that, when set against the wider challenges facing the housebuilding sector, including poor absorption of market housing, high build costs and high borrowing costs, the influence of cycle standards on viability will generally be marginal. The Council also notes the list of potential ways in which it is considered that relaxed cycle standards may improve viability at Paragraph 2.3.4. With respect to point 1, for example, the Council considers it very unlikely that basements are being routinely provided on schemes with the sole purpose of accommodating cycle parking, and would suggest that, where provided, basements often also include space for plant, other building infrastructure, and resident facilities (e.g. swimming pool/gym), refuse and recycling storage, and vehicular parking, so that the ground floor of a building can be another land use with an active frontage, such as a commercial one.

For these reasons, the Council considers that a slight decrease in cycle parking standards is unlikely, on its own, to significantly improve the viability of developments that are currently unviable. The introduction of a lower standard that does not improve viability for these ‘stalled sites’ does however create a risk of unintended consequences where the lower standard can still be universally applied by developments that are already viable without the need for site-specific justification. To provide greater mitigation to these risks, and avoid undermining the importance of enabling high uptake of cycling, the Council suggests that applicants wishing to apply the lower standards could be required to provide proportionate evidence which allows the Council to consider whether the reduction in standards is acceptable.

Given that the proposed flexibilities are time-limited on the basis of improving short-term viability, the Council would also encourage consideration of whether existing standards which apply to more viable residential products such as student housing or co-living should be maintained as they are, albeit it is recognised that within Band 1 there may be instances where these developments actually need to increase their cycling provision.

Question 2: Do you consider that the guidance on flexibility and quality in

sections 2.3 and 2.4 of the guidance will address development viability and cycle parking quality challenges?

The notion of alternative forms of cycle parking contributing to the achievement of standards is considered reasonable subject to consideration of local circumstances (including the availability of, and access to, more communal forms of cycle parking). The Council would also want to be confident that any mix of different forms of cycle parking proposed is genuinely sufficient (in quantity and type) and would genuinely cater for a full range of users (including providing opportunities to store other vehicles such as pushchairs) so as to support the overall objective of encouraging the occupants of new developments to take up active travel.

In relation to developments providing space for public cycle or scooter hire, the Council recognises that there is precedent for this model whereby developments have paid to TfL to provide bicycle docking stations which have then been installed on the adopted highway or on private land, subject to agreement.

In relation to managed on-site shared cycles or scooters, the Council's main reservation would be in relation to active and responsible management of any shared cycles for the lifetime of a development. Depending on the size and model of a development, many developments are not routinely staffed, which would create a heightened risk of antisocial use of shared cycles. There may be options through the planning system to manage this, for example through a dedicated management plan, although given the GLA is proposing these flexibilities on the basis of improving viability, it is arguable whether the costs of managing an on-site cycle service would improve viability relative to providing permanent parking facilities.

The additional provision of on-street parking such as cycle hangars is considered a reasonable ambition, subject to local circumstances and an appropriate Traffic Management Order being successfully made. Likewise, additional storage for folding cycles and contributions to off-site communal parking respectively could be reasonable in certain circumstances, provided that any communal cycle parking is secure and well-maintained. Other aspects would need to be considered on a case-by-case basis including the amount of space on the highway being available and any long-term management arrangements.

As previously mentioned, the Council does not oppose the notion of introducing certain flexibilities. However, when assessing planning applications, the Council will still need to ensure that the type and amount of cycle parking proposed is suitable for the specific circumstances. The LPG should make it clear that these flexibilities, while intended to support viability, are not there to enable applicants to select the most financially favourable cycle parking arrangement if it fails to meet the Council's standards for overall provision, type, or balance. This is particularly important in relation to any off-

siting of cycle parking, which can introduce complexities in relation to funding, land ownership and certainty.

In relation to the stated objectives of these flexibilities, the Council notes that greater flexibility might slightly enhance viability for certain developments, but it is considered unlikely that such measures alone will have a significant impact on viability, particularly for sites that are truly unviable. Please see the Council's response to Question 1 which relates further to this concern.

Part Two: Housing Standards

Question 3: The GLA welcomes views on the proposed changes to the housing design standards.

The Council strongly believes that new homes must be delivered to a high standard, fostering a healthy living environment. There is substantial evidence linking housing quality to various health and socioeconomic outcomes, and the risks posed by climate change, particularly overheating in London, underscore the need for ambitious housing standards. These standards help ensure that all households benefit now and in the future, and prevent the need for extensive retrofits, such as mechanical ventilation, to maintain liveability.

Although the LPG would not be formal policy, the Council would emphasise that its publication should not explicitly override existing London Plan or Local Plan policies on housing quality, nor encourage an expectation that local authorities will accept low quality developments. It is essential that the LPG explicitly states that all developments must continue to achieve a high-quality living environment in line with adopted policies, and any deviation should only be justified by exception.

The Council notes that the consultation proposes withdrawing Standards C4.1 and B2.5 from the Housing Design Standards LPG (2023). This would remove the requirement for all new homes to be dual aspect and the cap on the number of homes accessed by a single core. While most measures in the LPG are described as "emergency" and are time-limited, the withdrawal of these standards appears to be permanent.

The Council has some concerns that, rather than encouraging development, these proposals may encourage developers with existing consents to resubmit applications to take advantage of these measures to increase density (and thereby improve site viability or profitability). While this could offer modest encouragement to bring forward some stalled developments, it may also incentivise others to delay implementation and seek new permissions, ultimately slowing the delivery of new housing.

Regarding Standard C4.1, the Council maintains that the policy objective for dual aspect dwellings should remain, consistent with London Plan Policy D6. The Local Plan has a specific policy which requires developments to maximise dual aspect dwellings and generally avoid single aspect units other than in specific circumstances.

Exceptions should only be made in cases where there is clear evidence of adequate passive ventilation, daylight, privacy, and overheating mitigation, and where the overall benefits justify the approach. Whilst the Council recognises that Standard C4.1 may have contributed to an interpretation that single aspect units are incapable of being justified, it notes that this was not ultimately what the relevant policies themselves, which evidently carry more weight, state. In any case, the Council would suggest that any changes to the LPG should clarify that withdrawing Standard C4.1 does not alter the policy position on single aspect dwellings, which, whilst not outrightly banned, will still require specific justification.

The Council does also recognise that planning policies on housing quality can sometimes overlap with Building Regulations or the Building Safety Regulator's role, which can, at times, create an unhelpful regulatory complexity, particularly when Building Regulations subsequently change or new regulatory bodies (e.g. the Building Safety Regulator) have been established. This overlap can also require planners to assess matters outside their expertise which may delay or complicate decision-making.

As for Standard B2.5, the Council supports the principle of not allowing an unlimited number of homes to be accessed by a single core for safety reasons but recognises these matters of building safety are ultimately addressed by the Building Regulations. The Council acknowledges that, depending on design, fire safety requirements from the Building Regulations can conceivably be met with, for example, 9 dwellings per core and that this is not inherently less safe than an alternative configuration with 8 dwellings. In other instances, all such matters fall to be approved by the Building Safety Regulator in any cases.

Whilst currently only out for consultation, the Council recognises that the 2025 version of the NPPF seeks to clarify the need to avoid planning policies (and decisions) overlapping with other regulatory regimes. Provided all relevant regulations and approvals are met, the Council therefore does not oppose relaxing planning controls on this issue.

Part Three: Time-Limited Planning Route

Question 4: The GLA welcomes views on the time-limited planning route.

Do you agree that this will support the early delivery of housing development whilst also maximising affordable housing provision in the short term? Are there any changes to the approach that would more effectively achieve these

objectives?

A key priority for the Council through its Corporate Plan 2022-26² is to become a fairer Borough. A central tenet of this priority is working towards ensuring all local people have a genuinely affordable place to call home. Part of this ambition means that by 2026, the Council is aiming to deliver 1,000 new council homes itself and to ensure developers build homes which best meet the needs of Wandsworth residents.

Since 2023, the Council has been carrying out a Partial Review of its Local Plan which aims to increase the amount of affordable housing delivered across the Borough, with a particular emphasis on social rented housing. As set out in the evidence for this Partial Review, as summarised in the Housing Background Paper³ (2025), the Council is keen to emphasise the particular strength and resilience of our local development market to support housing delivery, and particularly affordable housing delivery. Wandsworth is an extremely popular place to live, and therefore a lucrative place to build, and whilst this growth has brought a lot of positive change, it also heightens inequalities and exacerbates challenges with affordable housing.

The Council's evidence base has highlighted its significant and urgent need for more affordable housing, particularly social rented housing. The Council's Housing Needs Assessment⁴ (2024) identifies that up to 23,000 affordable homes will be needed by 2038, of which over 17,000 would need to be social rented. This would represent around two-thirds of all homes planned to be built over that period. Similarly, over 11,000 households are currently on a Council housing waiting list, of which nearly 4,000 are homeless, and many others are living in inadequate or overcrowded conditions. The Council's Housing Background Paper identifies a wide range of research identifying the socioeconomic imperative for properly planning for national and local social housing needs.

Although the local market remains robust, the Council acknowledges that certain parts of London are facing difficulties in housebuilding, driven by poor sales rates for market housing, rising construction costs, elevated interest rates, broader economic uncertainty, and delays associated with the Building Safety Regulator. The Council supports the principle of co-ordinating actions at every tier of government to encourage development across London but is clear that these should be designed to directly address the root causes of these issues, and targeted at developments that are genuinely stalled because of current market conditions. It is also clear that measures that may be considered justified in an outer London context, should not be unnecessarily applied to a Borough like Wandsworth where they risk offering disproportionate policy flexibility that is not justified by local evidence.

² [The Plan for Wandsworth](#)

³ [sd013_wandsworth_housing_background_paper_april_2025.pdf](#)

⁴ [Wandsworth Housing Needs Assessment](#)

For these reasons, the Council has a number of significant concerns over the justification, effectiveness and legal status of the proposed time-limited planning route, which it sets out in detail below.

Lack of Targeting or Local Justification

The Council has serious concerns that the proposed new time-limited planning route is inadequately targeted to less viable developments. It feels that the planning route is not designed in such a way that only allows unviable developments a degree of policy flexibility in order to be delivered, but instead provides active encouragement to developments that are viable, including those with viable permissions already, to bring forward alternative schemes that provide just 20% affordable housing, without any need to provide a site-specific justification or viability assessment for failing to deliver the full policy requirement of 35%, as would otherwise have been required under the Viability Tested Route.

The Council is concerned by the lack of objective evidence or impact analysis that has been made available to support the introduction of the new planning route. On the basis of the information provided, the Council understands that the rationale for the new planning route is largely a suggestion that some developments across London are struggling to deliver more than a negligible level of affordable housing, and that this new route will therefore increase the amount of affordable housing secured from development. This predicted outcome of the intervention assumes an unrealistic degree of homogeneity across London's housing market and the lack of any geographical or Borough-level differentiation in this rationale is a matter of concern.

It should be noted that, in Wandsworth, we are continuing to see developments come forward at or close to full policy compliance, with 34% of housing completions in 2023/24, and 36% and 32% of housing permissions⁵ in 2023/24 and 2024/25 respectively, being affordable. The overall number of permissions and completions in Wandsworth in 2024/25, at the height of challenges in the development market, remained a healthy 2,395 and 1,805 units, 123% and 93% of the Borough's annual housing target respectively. For boroughs like Wandsworth, it is clear that the new planning route would offer a level of assistance which is completely disproportionate and excessive to local market conditions. The practical impact of this new route is that developments which could have clearly afforded to deliver 35% affordable housing are now incentivised to only deliver 20%. As a result, these developments will have a legitimate route to trading lower affordable housing contributions for abnormal levels of developer profit that far exceed the industry standard of 17.5% of the GDV. Whilst the Council has a number of concerns over the principles of the new route, if it was to be

⁵ Includes permissions on sites <10 homes which are not required to provide affordable housing

introduced, a far more targeted approach is urgently needed so that any flexibility is only available to developments where there is robust evidence that they would otherwise only be able to come forward for less than 20% affordable housing, or conceivably, based on a more spatially evaluated method, such as only in those Boroughs where average affordable housing delivery has fallen below 20% over a sustained period.

Undermining of Evidence-Based Planning Policies

The Council supports the principle of the plan-led system to planning. Maintaining the plan-led system means that opportunities for evidence-led and community-shaped planning are priorities and that the negative consequences of unplanned or speculative development are better avoided.

To support the plan-led system, Local Plans have to go through rigorous testing including whole plan viability testing, as well as detailed analysis of previous levels of affordable housing delivery and levels of future housing need. These factors are then weighed up and balanced in preparing policies that set an appropriate strategy for the delivery of affordable housing, both with respect to the overall amount delivered and the tenure mix. This is a key expectation of national policy.

The legal basis for superseding key strategic policies in the London Plan and Local Plans through London Plan guidance is also a matter of concern. London Plan guidance cannot introduce new policy and must be consistent with the London Plan⁶. In this case, the Council is concerned that London Plan guidance is not the appropriate mechanism for a review of the London Plan's affordable housing policies and would encourage the GLA to instead prioritise such a review through the London Plan review itself, supported by a clear evidence base.

The Council has recently itself been through a Local Plan process which is close to being concluded. As part of this process, the Council prepared detailed evidence which has been made available for public scrutiny, including a Housing Needs Assessment and a Whole Plan Viability Assessment⁷ (2025). The Council's Whole Plan Viability Assessment demonstrated that the vast majority of likely developments coming forward in Wandsworth are able to provide an affordable housing contribution equivalent to at least existing 35-50% thresholds. In summary, 78% of tested typologies could support 35% affordable housing across all benchmark land values which only increases to 87% of typologies at 20% affordable housing. Of those developments that cannot deliver the

⁶ "LPGs have no specific statutory weight and cannot create or change London Plan policies. However, they are considered to be a material planning consideration in the same way as SPDs at a borough level; and can add further, more detailed guidance as to implementation of the London Plan and assist in achieving key objectives in practice. " [London Plan Guidance | London City Hall](#)

⁷

[wandsworth.gov.uk/media/sciea4c0/sd022_wandsworth_whole_plan_viability_assessment_march_2025.pdf](https://www.wandsworth.gov.uk/media/sciea4c0/sd022_wandsworth_whole_plan_viability_assessment_march_2025.pdf)

existing policy requirement of 35% affordable housing (22% of tests), a vast majority fall within existing uses or value areas which are not expected to make up any significant portion of the Borough's future housing supply, and nearly half remained unviable at 0% affordable housing suggesting a lower affordable housing target is of limited value for viability purposes. Detailed analysis of this evidence is set out in response to Question 2.8 in the [Council's Statement for its Affordable Housing Policy](#) prepared as part of the Examination of its Local Plan. In summary, the indications of this evidence demonstrate that a reduction in affordable housing requirement to 20% is not necessary, and is therefore not justified, for a vast majority of sites in Wandsworth. For this vast majority of sites, the new planning route offers an opportunity to deliver less affordable housing than they can afford to. This diminished affordable housing delivery would not be compensated for by higher delivery elsewhere and is likely to be simply lost as a public benefit in the form of increased profit or inflating the price paid for land.

Impacts on Land Values and Long-Term Viability

The Council notes that the new planning route is proposed to exist alongside the Fast Track Route and Viability Tested Route. However it is far from clear what the GLA's envisaged role for the Fast Track Route would be for an interim period, other than for the limited number of sites that are explicitly excluded from this new route.

Clearly any significant degree of use of the new planning route would undermine much of the purpose and functioning of a London-wide Fast Track Route which the Council understands based on past GLA engagement has been to embed the 35% affordable housing requirement in land values in order to improve the ability for a typical development to "afford" the affordable housing contribution. The GLA has iterated this justification in a range of policy and research documents as well as consultation responses directly to the Council in relation to its Local Plan Partial Review. In the *Accelerating Housing Delivery* Practice Note (2024), the GLA made clear that it will continue to raise non-conformity concerns for any Boroughs which sought to deviate from the London Plan in relation to the Fast Track Route.

The Council considers that a lower threshold that is universally available even if only in place for a limited period of time is likely to have an inflationary impact on land values. As such, the new planning route does not align with the GLA's previous evidence on the need to retain the 35% threshold and resist deviations from that threshold. In this respect, the new planning route actually undermines the aim and effective functioning of London Plan Policy H5.

If it is the GLA's view that the new planning route will not have an inflationary impact on land values, the Council would welcome analysis of what impact the new planning route can be expected to have on land values, so that these impacts, and the potential

long-term implications for affordable housing delivery, can be properly appraised. Evidently if land values were to increase as a result of the new planning route, this may render notional expiry dates redundant if it leads to viability pressures that persist in the long-term. This may then make re-implementation of the current Fast Track Route beyond 2028 extremely challenging.

Lack of Available Evidence or Impact Analysis

The Council considers it important that new policy is fully informed by evidence and opportunities for stakeholder and community involvement.

The Council has reviewed the background paper that has been made available alongside the consultation. It notes that this paper soundly appraises a number of challenges currently facing housebuilders in London. However, the Council is concerned that the proposed measures do not themselves address the root causes of these challenges and therefore this evidence base does not provide a cogent justification for the measures.

The Council and GLA worked collaboratively on a number of aspects relating to the Council's emerging Local Plan Partial Review, and together placed a significant emphasis on the need for evidence and proper appraisal of alternatives on the basis of impacts.

It is a matter of particularly deep concern that the new planning route is not supported by any new housing needs or viability evidence. Without this evidence, the consideration of potential impacts is not substantiated.

In terms of implementation, the extent to which this LPG can be considered a material consideration holding material weight is fundamentally limited by the lack of objective evidence that has been made available for scrutiny, particularly when compared against only recently prepared and evidence-based planning policies. The Council would strongly encourage the GLA to delay introduction of any new planning route in order to prepare clear evidence which identifies the proportion of developments likely to be viable at existing policy levels and under the new planning route, and detailed analysis of the consequential impact on affordable housing delivery that can be expected from the new planning route (positive or negative).

Lack of Impact on Root Causes of Poor Build Out

In relation to the background report itself, the Council notes it explores a range of factors that are negatively impacting London's housing market at this time, including build cost inflation, declining sales rates and delays with the Building Safety Regulator. The Council acknowledges that these factors are having a negative impact on London's

development market and, as set out above, would support, in principle, targeted interventions at every tier of government to address these factors. However, it is not clear from the background report how the proposed new planning route relates to these factors. Given the lack of effective demand of market for sale units, the lowering of affordable housing contributions, will in turn lead to a higher share of for-sale market units which will increase the level of risk associated with bringing developments forward. There is a significant amount of evidence, including Lichfield's Start to Finish Report (2024) which shows that increasing the amount of affordable housing is an effective way of improving build out rates, however the proposed measures would do the opposite.

It is also noted that housebuilding is not a sector that follows the typical model of supply and demand. One way in which demand for market homes could be improved is through correction (i.e. reduction) to the asking price. However, there is again significant evidence, including the Letwin Review, which shows that when faced with demand pressures, developers will instead moderate their output to maintain prices as they are.

In relation to the typical viability model, developers are usually allocated 17.5% of profit from market units which reflects the risk associated with market for sale units not selling at the estimated price. Other products such as Build-to-Rent or Affordable Housing are allocated significantly lower levels of profit, 15% and 6% respectively, since the estimation of their GDV is associated with a significantly lower level of risk due to high demand for private and affordable rented housing products. It is important to note that the 17.5% level of profit is not guaranteed to developers but instead estimated based on the level of risk associated with the valuation of a specific housing product. A lower level of actually achieved profit due to changing market conditions is the normal operation of the viability assessment. In this situation, the market should be supported in ways that do not embed lower affordable housing contributions into land values. If intervention is required to improve market absorption, the Council considers that the logical conclusion of the background report ought to be that targeted interventions are urgently needed to improve the availability of affordable housing and the affordability of market housing, as well as addressing some of the strains on build out such as known delays with the Building Safety Regulator.

In terms of the general rationale for the measures, the Council notes it is suggested that the new planning route will help to improve build out by increasing the amount of affordable housing on-site (and therefore reducing the amount of market housing that developers are required to sell). This is on the basis that a lower percentage of affordable housing is likely to be secured without the route. However, as explained elsewhere, this is not likely to be the case for a typical development in Wandsworth, and particularly for any developments which have been recently consented at a higher level

of affordable housing and who now have a financial incentive to return to the Council to seek a lower percentage. The Council is concerned that, by not limiting any new planning route to those sites which genuinely would come forward for less than 20% affordable housing without them, the proposed LPG is likely to actually harm build out by considerably reducing the amount of affordable housing delivered on more viable sites.

Lack of Justification Against Existing Mechanisms

The Council is also concerned that the new planning route will unnecessarily undermine the effective functioning the Viability Tested Route. It is not clear why the Viability Tested Route is not seen as an effective mechanism for enabling an evidence-led decision to be reached on the maximum level of affordable housing achievable on a particular scheme having regard to site-specific and local circumstances, whilst not offering charity to developments which do not require it. The Council's view is that the notion that the Viability Tested Route is burdensome and a disincentive to bringing otherwise viable developments forward is exaggerated. In fact, viability negotiations are very often resolved prior to other material issues.

In relation to the Viability Tested Route, the Council would welcome the publication of objective analysis of the actual timescales involved so that these can be compared with the hypothetical timescales involved with the new planning route. The Council's view is that there is unlikely to be any material advantage to following the new planning route in terms of time to decision. Other factors such as delays with the Building Safety Regulator and the time it takes for the GLA to approve grant rates have a considerably more significant impact on slowing down the delivery of housing. The Council would also welcome an analysis of the impact of determining applications that go through the Viability Tested Route in context of the impacts of these other delays.

To summarise, the Council does not believe that the proposed time-limited planning route will effectively accelerate housing delivery or increase affordable housing provision in the short term. The Council urges the GLA to delay introduction of any new route pending the preparation of further evidence and impact analysis, which should include the preparation of proportionate viability evidence and housing needs assessment. Should these assessments demonstrate that a review of the London Plan is warranted, the Council recommends that the GLA introduce any new policy through suitable mechanisms, such as amending the London Plan, whilst taking appropriate account of local opportunities to maximise the delivery of affordable housing.

Question 5: Do you agree with the proposed eligibility criteria for the time limited planning route? The GLA welcomes any views on whether this will, and how this better can, help to achieve the objective of increasing housing supply and supporting early delivery whilst also maximising affordable

housing provision in the short term

Please see the Council's response to Question 4 which is relevant to this question with respect to the thresholds that would apply.

Notwithstanding the Council's wider concerns, it supports the proposal that Purpose Built Student Accommodation and Purpose Built Shared Living should be exempted from the time-limited planning route. The Council's Whole Plan Viability Assessment and wider evidence across London shows that these forms of accommodation have become disproportionately viable relative to conventional housing, partly due to the different economics at play but also because they often do not contribute towards conventional affordable housing or CIL (within Wandsworth). Because of this dynamic, there is a very apparent risk across parts of London, including Wandsworth, that the prevalence of PBSA and PBSL imbalances land supply away from conventional housing. Given that London Plan policy does not require these products to deliver conventional affordable housing on-site (although noting that the Wandsworth Local Plan seeks to address this), a continued oversupply of these products risks further undermining efforts to meet severe and urgent needs for affordable housing. The Council does however note that eligibility for mixed tenure sites which include PBSA and PBSL is set at 50% of floorspace. The Council considers this should cap the amount of PBSA or PBSL much lower, perhaps at 25%.

Whilst the overall level of affordable housing is extremely importance, the Council wishes to emphasis the wider importance of ensuring the tenure of affordable housing delivered meets local needs. In this context, the Council feels that that the tenure split identified for the new planning route (60% low-cost rent; 40% intermediate) is not justified locally when considering the urgent and severe need for social rented housing in Wandsworth. The Council's emerging policy requires a minimum of 70% of affordable housing to be social rented, which is a sound policy position that has been informed by evidence on both housing need and viability. On housing need alone, the need for social rent would greatly exceed 70%. The Council is concerned that the proposed tenure split is not evidence-led and would serve to underprovide social rented housing relative to need. If it is the GLA's view that such a tenure split is required to maximise viability then it should make any viability evidence which has informed this view available for public scrutiny.

Alternatively, whilst such an alternative would require its own analysis, the Council is more likely to welcome a tenure split which compensates for the overall reduced level of affordable housing by foregoing a larger portion of the intermediate housing and safeguarding the social rented portion (for example, a 25% threshold at 100% social rent). In the absence of any evidence which justifies the tenure split proposed, the

Council does not consider there to be any justification to depart from its recently examined Local Plan policy position.

Question 6: Do you agree that the proposed approach to grant will help to achieve the objective of increasing housing supply and supporting early delivery, whilst also maximising affordable housing provision in the short term? To what extent will this help to support the acquisition of affordable homes secured through the planning process by Register Providers?

The delivery of more affordable and social housing is a key priority for the Council and in this respect, it strongly welcomes the increased availability of additional grant towards affordable and social housing.

The Council notes that under the time-limited route, grant will be automatically available to make up half of the minimum 20 per cent affordable housing contribution without any viability testing. As set out across the Council's comments, it is concerned that the new planning route offers an opportunity for developers of sites which can demonstrably deliver more than 20 per cent affordable housing to reduce their contribution and make an abnormally large profit. In this context, the Council would prefer if any private funding replaced by grant was justified on the basis of viability, given that, in many cases, the need for that private funding will have been known for the entirety of the scheme's development, reflected in the price paid for land, and otherwise already been committed to delivering that affordable housing. The Council would prefer if grant was used instead to increase the amount of affordable housing to be delivered above that which can be delivered through private capital alone. This approach would continue to support deliverability of schemes by raising the proportion of affordable housing on each site, which evidence (including Lichfields' Start to Finish Report (2024)), shows positively influences build-out rates, as it reduces the volume of market housing, currently the most challenging product to sell, remaining on-site.

Outside of the new planning route, the Council would support the principle of reviewing the restrictions within the London Plan which relate to how grant can be used to increase affordable housing delivery. Within existing London Plan policy, grant is only considered if a site is delivering a minimum 35% affordable housing from the developer. However there are many sites where a lower level of affordable housing is shown to be the maximum achievable through developer-funding alone, yet the layout and design of the site would lend itself to additional affordable housing being delivered through grant. As an alternative to what is being proposed, it may be beneficial to reconsider the threshold of affordable housing that must be provided on-site for grant to be applied for from developments following other routes. This would help prevent sites which could have delivered more affordable housing from being incentivised to deliver less whilst meaning sites which are unable to meet affordable housing requirements from private

funding alone do not miss out on grant opportunities. This could also help provide sites where viability has been fully tested and verified to maximise affordable housing delivery through grant.

The Council appreciates the fact that the draft LPG acknowledges the need for additional steps to strengthen the financial position of registered providers. It agrees with the G15's perspective that developers should be required to engage with providers landlords earlier and more effectively, ensuring that the design and quality of homes provided align with their expectations. Furthermore, the Council would endorse provisions in the LPG that prevent developers from benefiting when behaviours that discourage registered providers from accepting affordable units, such as making early and transparent engagement a mandatory condition for any future grant or policy flexibility.

Question 7: The GLA welcomes views on the approach to reviews under the time limited route, including whether any further criteria should be applied which would a) incentivise early delivery, or b) help to ensure that, if reviews are triggered, additional affordable housing contributions are provided where viability improves over the lifetime of the development.

The Council considers it to be vitally important that any time-limited route, if ultimately introduced, is strictly limited to developments that there is sufficient evidence could not be viably delivered without it. However, the Council remains of the view that the Viability Tested Route already offers an appropriate mechanism through which this flexibility can applied and that disincentives associated with the Viability Tested Route should not be overstated.

Late-stage reviews are effective tools that give confidence that affordable housing contributions below policy compliance that are agreed to on the basis of viability are capable of being increased should viability improved. Their existence gives both councils and communities confidence that any lower levels of affordable housing agreed under the Viability Tested Route cannot be cemented in place in a way that means when viability improves, developments can bring forward permissions secured under different market conditions for increased profit.

For these reasons, the Council is of the view that a late-stage review should remain in place for any development that does not meet the full policy requirement towards affordable housing, whether through the Viability Tested Route or any proposed new time-limited route. The Council does not consider that this should be limited to developments that have not reached a prescribed level of build out by 31 March 2030 but rather any developments achieving less than the full policy requirement.

Within the framework of the LPG's specific proposal, the Council would be somewhat concerned that requiring applicants to inform the local planning authority when they have not achieved the expected level of progress could create unintended incentives and lead to varying interpretations of what constitutes completion of the first floor. The LPG should provide a clear, objectively verifiable definition of this milestone, such as one that can be independently confirmed through Building Regulations, and specify that if an applicant fails to self-report a lack of progress, the development will automatically become subject to a late-stage review. This would help prevent delays or incomplete reporting from being used to obscure whether a development qualifies for such a review.

Question 8: Recognising that the substantial implementation milestone of the first floor set out in 4.6.1 may not be appropriate in all instances, are there any circumstances in which an alternative review milestone to completion of the first floor would be necessary and justified, in a way that continues to incentivise fast build out?

Please see response to Question 7.

Question 9: An alternative approach for phased schemes would be for boroughs, and the Mayor for referable applications, to have discretion to agree forward dates and milestones for future phases if it would support the faster build out of the scheme, which if met mean that no review is required for that phase. Do you agree with this and what measures would be required to ensure that this resulted in faster build out than may otherwise be the case?

Please see response to Question 7.

Any indicative milestones for late-stage reviews in multi-phased schemes should not be subject to negotiation unless the local planning authority itself identifies a justification for this negotiation. The implied ability for developers to negotiate out a review mechanism creates obvious incentives for developers to seek more advantageous milestones which effectively extend the period during which the lower affordable housing threshold applies. The implied availability of an extension would also reduce some of the incentives tied to a fast build out, if developers feel that they are likely to find sufficient justification to avoid a review if they do not build out by the prescribed dates.

For these reasons, any flexibility in setting milestones should be solely determined by the local planning authority, using its discretion to decide if the specific circumstances of a development justify proactively agreeing to future milestones. This could include exceptional circumstances such as where agreeing to a different milestone would

clearly enable delivery of additional public benefits which the local planning authority agrees would be in the public interest.

Question 10: The GLA welcomes views on any additional measures that would support the delivery of schemes with existing planning consents which provide 35 per cent or more affordable housing. Do you agree that the time limited planning route would support schemes which have been granted planning consent but are currently stalled?

The Council feels strongly that schemes with existing planning consents should not be eligible for the time-limited route.

As currently proposed, the Council would have significant concerns over the ability for schemes which have an extant planning permission which either achieves a policy compliant level of affordable housing or a level of affordable housing above 20% that has been evidenced through the Viability Tested Route, to re-apply for permission with a reduced level of affordable housing under the new planning route. As currently proposed, the Council would not be able to request new viability evidence to justify that lower level of contribution.

The draft LPG indicates that developers with extant permissions which are securing at least 35 per cent affordable housing but which consider themselves stalled due to viability reasons will be expected to explore the availability of grant to maintain or increase the level of affordable housing. However, this wording is clearly very passive and falls short of indicating that such developments will not be able to access the new planning route unless they maintain their consented level of affordable housing (through grant or other means).

This is particularly concerning as there is no mechanism within the time-limited planning route through which local planning authorities are asked to objectively test whether a site is genuinely stalled due to viability reasons or has been deliberately stalled for another reason. There is widespread reporting of developments across London which have been deliberately stalled to await the proposed new measures or simply because of poor absorption of marketed housing which is not a true viability reason. There is also simply some degree of consented housing which has not been programmed to come forward yet by that developer, which could nevertheless be labelled stalled without an objective definition.

The Council is concerned that any development with an extant permission could self-report as stalled and, because of the lack of provisions for viability testing, the Council would not be able to test whether the original permission is genuinely undeliverable. In some cases, the Council may have only very recently consented developments at full policy compliance or at levels of affordable housing negotiated through the Viability

Tested Route where there is clear evidence, in the form of a recent Full Viability Appraisal, that the development can deliver more than 20% affordable housing. The practical implication of allowing these recently consented developments to access the new planning route without the need for new viability evidence is to legitimise the trading of viable affordable housing for increased profit.

The Council is concerned that the only mitigation to the above offered by the proposed LPG is an expectation that such developers will need to explore whether they can access grant. There is no clear commitment included as to the circumstances in which grant will be guaranteed or clear tests that will be applied as to whether these explorations are sufficient.

Taken as a whole, the Council feels it is highly likely that the new planning route will encourage developers to provide lower levels of affordable housing than they could reasonably afford to deliver. In many cases, it is likely that these proposals will come forward in a way that departs from the requirements of the relevant development plan policies, which is not individually justified by its own evidence, and which the evidence that is available (such as whole plan and site-specific viability assessments) does not support. In these instances, it would appear to be irrational for that local planning authority to allow developers to follow the new planning route, particularly given that the new planning route is not development plan policy and has not been accompanied by any objective evidence which can be weighed in the planning balance against those referenced above.

For these reasons, the Council considers that the LPG should make clear that developments which have been recently consented (for example in the previous 24 months) at levels of affordable housing exceeding 20% will not be considered eligible for the new route and must follow the Viability Tested Route if they wish to renegotiate their affordable housing contribution. Notwithstanding the Council's wider concerns, the ineligibility of recently consented schemes would add a significant amount of rigour to the process.

Question 11: Are there any further measures that would help to prevent the level of affordable housing being reduced in consented schemes where this is not needed to enable the development to progress?

Please see response to Question 10.