

Wandsworth Council

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Sadiq Khan, Mayor of London

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Sent by Email

Dear Sadiq

CONSULTATION ON SUPPORT FOR HOUSEBUILDING LONDON PLAN GUIDANCE

On behalf of Wandsworth Council, I am pleased to provide our detailed representations on your draft London Plan Guidance titled Support for Housebuilding.

The Council recognises the importance of maintaining a strong pipeline of housing delivery across London for achieving a range of social, economic and environmental benefits, but most importantly to ensure that the right types, tenures and quality of housing are available to meet needs, particularly for those whose needs are not always met through market housing, most particularly those who need affordable housing.

In this context, the Council supports the principle of targeted interventions to support the maintenance of that strong pipeline of housing delivery, provided that those interventions are appropriately targeted to measures that are threatening delivery, without undermining the overall importance of maintaining that delivery and meeting those needs referenced above. The Council is a delivery partner to the GLA and has a proud history of working with you to deliver good growth.

The Council understands that housebuilders active in London have identified a range of challenges which include poor absorption of market housing due to a lack of effective demand for that housing, recent high levels of build cost inflation, wider economic uncertainty, high borrowing costs and technical delays at receiving approvals with the Building Safety Regulator.

The Council itself is strong advocate for good growth and has taken a lead role in delivering new council housing across the Borough through the [Homes for Wandsworth](#) programme. The Council's [Corporate Plan 2022-2026](#) has a key ambition to deliver a fairer Wandsworth, a compassionate Wandsworth and a more sustainable Wandsworth. One of the key ambitions of the Corporate Plan is to work towards ensuring all local people have a genuinely affordable place to call home. This ambition is a key driver of the Council's [Growth Plan \(2025\)](#) and [Local Plan Partial Review](#), which has recently concluded examination, and is supported by a range of evidence that demonstrates the uniquely strong local housebuilding market in Wandsworth, and the opportunities this brings to deliver ambitious public benefits.



We are pleased that Wandsworth continues to be a highly attractive place to build and live, and there is significant evidence that the local housebuilding market remains very resilient to the types of challenge facing other parts of London.

Cycle and Housing Standards

The Council supports maintaining ambitious cycling and housing standards to promote the development of high-quality living environments and encourage healthy, active lifestyles. While we support maintaining ambitious standards, we recognise that allowing a limited degree of additional flexibility in applying these standards may be justified in certain circumstances, particularly due to a changing regulations and habits since the London Plan was published in 2021. The Council has provided specific comments on how these flexibilities could be offered in a proportionate and effective way in its detailed representations which we hope you find useful.

New Planning Route

Since late 2023, the Council has been working to undertake a partial review of its Local Plan, which has involved significant constructive engagement with GLA officers which we are grateful for. The objectives of the Local Plan Partial Review are to ensure local policies better reflect the scale of opportunity within the Borough's strong development market, and the need for ambition to address the severe and urgent levels of need for affordable housing locally. As part of this process, the Council has prepared detailed evidence, including a Housing Needs Assessment (2024) and a Whole Plan Viability Assessment (2025).

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 Assessment (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 \(2025\)](#) identifies a wide range of research identifying the socioeconomic imperative for properly planning for national and local social housing needs.

The Council's Whole Plan Viability Assessment (2025) demonstrates 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 sites 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 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. Lowering the effective affordable housing requirement for private sites from 35% to 20% in Wandsworth will lead to a significantly harmful impact on affordable housing supply in a way that does not reflect local viability or need.

With respect to delivery on the ground, the Council would note that 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 permissions 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.

Having regard to the available evidence on delivery, needs and viability, the Council is very concerned that the new planning route proposed in the London Plan guidance would significantly undercut the level of affordable housing known to be achievable in a Wandsworth and will be harmful to our combined efforts to maximise affordable housing delivery, and particularly social rented housing.

The Council has reviewed the evidence made available alongside the proposed new route. The background report explores a range of challenges 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 challenges in London's development market and, as set out above, it would support further work in collaboration with the Mayor to address these challenges. However, the Council is concerned that the proposed new planning route is not designed to address these underlying challenges.

We recognise that in some parts of London, the new route may offer genuine opportunities to increase the average level of affordable housing on sites, compared to sites currently coming forward. However, we want to emphasise that there is a great deal of heterogeneity to London's development market and, in a Wandsworth context, the new route is very likely to mean that the average share of affordable units on sites will actively decrease, and the share of market units will increase, relative to the averages currently being seen in new permissions and completions. Consequently, the level of risk associated with bringing developments forward may increase. There is also a significant amount of evidence, including Lichfield's Start to Finish Report (2024) which shows that lower rates of affordable housing on sites is harmful to build out rates. Furthermore, in the short to medium term, the proposals create uncertainty which readily risks the unintended consequence of delay, including for sites which could viably progress with delivering a higher quantum of affordable housing without additional public subsidy.

The Council is also particularly concerned over the lack of provisions within the new route for viability testing. As currently proposed, developments will not need to demonstrate that a lower affordable housing contribution is required to make their development viable. In light of the available evidence pointing to significant capacity and resilience within Wandsworth's local market, the ability for the many developments which can viably deliver in excess of 20% affordable housing to simply cap their affordable housing contribution at 20% is considered unjustified. In particular, the ability for developers with extant permissions to use the new route to lower their affordable housing contributions will be particularly unjust where these developments have only recently received planning permission at a higher level of affordable housing, including examples where the Council may have only recently seen a full viability assessment for that site. At present, the mitigation offered to this risk is an expectation that developers will seek grant to maintain that higher contribution, but this falls short of clear instruction that developers which can

afford to provide affordable housing above 20% must maintain this higher level. To be clear, the Council considers that any developments which have an extant permission securing in excess of 20% affordable housing should not be able to lower their affordable housing contribution without providing new, detailed and transparent viability testing.

The Council would also welcome further analysis on how the time-limited planning route is expected to impact upon viability beyond the expiry of the route. One of the key matters upon which the Council and GLA Officers have engaged in the context of the Council's Local Plan Partial Review has been the relationship between policy costs and land values. One of the key arguments made by GLA officers has been that the success of the universal 35% threshold across London has been in the fact it has forced land values to adjust to accommodate that requirement, and that local variations to that universal threshold risks undermining this adjustment. As a result, the Council would be concerned a lower threshold that is universally available, even if only in place for a limited period of time, risks having a re-inflationary impact on land values. This would make it more challenging to accommodate the re-introduction of a higher threshold at the expiry of the measures or through the new London Plan.

As above, the Council has sympathy for the need for targeted, effective and justified measures to support housebuilding in London, with a particular emphasis on social and affordable housing. However, in a Wandsworth context, the Council is concerned that the measures proposed are disproportionate and offer a degree of charity that is unjustified and harmful to efforts to maximise affordable housing delivery. Throughout the Council's response, it has aimed to make constructive suggestions on how the new route could be improved and to avoid and mitigate some of the identified harms which we hope are helpful to you. We would greatly welcome the opportunity to work with you and your teams on the proposals further.

Yours sincerely,

Cllr Aydin Dikerdem

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