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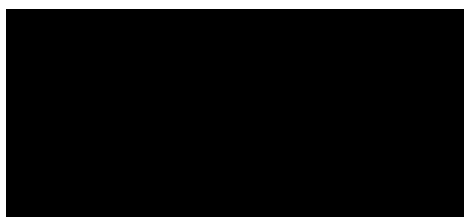
Dear Sir / Madam

### **Wandsworth Local Plan: Regulation 19 consultation**

Thank you for consulting on the Wandsworth Local Plan, Regulation 19 version. The following response is provided by James Stevens, Director for Cities, on behalf of the Home Builders Federation (HBF).

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 51% of all affordable homes built in 2020/21.

James Stevens contact details are:



**HBF would like these representations to read alongside our previous Regulation 19 submission.**

**The HBF would like to appear at the examination-in-public to discuss any remaining issues of soundness raised by these representations.**

### **Plan period**

Para. 1.5 states that the Council's Local Plan will operate over the plan period of 2023 to 2038 – a period of 15 years.

It would be helpful if the Local Plan could state this on its front cover.



## Housing need / plan requirement

The London Plan sets a target for Wandsworth of 19,500 additional homes to be provided over a ten-year period (2019/20 to 2028/29). This represents an annualised average target of 1,950 new homes per year. The Local Plan establishes a requirement for 20,311 homes over the 15-year plan period.

### SDS1 Spatial Development Strategy 2023 – 2038

The policy is unsound because it is inconsistent with London Plan and national policy.

The calculation of the housing requirement and what annualised figure will be used to measure performance is unclear.

Part A of the Policy states:

“Within the period 2023 – 2038 the Local Plan will provide for a minimum of 20,311 new homes. This includes the provision of a minimum of 1,950 new homes per year up until 2028/2029, including on small sites.”

The London Plan establishes a requirement for Wandsworth to provide 1,950 dwellings per year for the ten years running from 2019/20 to 2028/29, or 19,500 homes in total.

First, the Local Plan is unclear as to how the overall requirement figure of 20,311 homes for the 15-year plan period has been calculated. It appears that the Council is assessing delivery for the period 2019/20 - the start date of the London Plan, until 2022/23 – the period prior to the start of the Plan. This implies that the Council is observing the requirement for 1,950 dpa for the four year period 2019/20 to 2022/23. That would suggest a need for 7,800 homes for that three-year period.

The table on page 35 provides a picture of the Council’s performance. This shows for those four years the following figures:

2019/20	1,359
2020/21	1,422
2021/22	2,571 (projected)
2022/23	2,169 (projected)

If delivery keeps pace with the projected figures, that would suggest that 7,521 new dwellings will be provided – a very little short (279) of the 7,800 required. It is unclear if the Plan is factoring this small shortfall into the new housing requirement to ensure that the London Plan targets for Wandsworth are delivered. Moreover, it is unclear what the Plan will do if delivery in 2021/22 and 2022/23 fails to match the projected supply. Will the shortfall be added to the housing requirement for the Local Plan, or is the deficit written-off? The Plan should clarify this.

Second, and of greater concern, it is unclear what annual figure is being used for the 15-year period 2023/24 to 2038/39. It is clearly not the figure of 1,950dpa applied across each of the 15-years from 2023/24 to 2038/39 because that would require 29,250 homes in total.

We acknowledge that the London Plan is only able to establish housing requirements for the London boroughs for the ten-year period 2019/20 to 2028/29. After that, housing capacity is uncertain. The London Plan states that setting annual housing requirements for the period after this should be based on evidence of capacity. As paragraph 4.1.11 states:

*If a target is needed beyond the 10 year period (2019/20 to 2028/29), boroughs should draw on the 2017 SHLAA findings (which cover the plan period to 2041) and any local evidence of identified capacity, in consultation with the GLA, and should take into account any additional capacity that could be delivered as a result of any committed transport infrastructure improvements, and roll forward the housing capacity assumptions applied in the London Plan for small sites.*

The Wandsworth Local Plan needs to be clear what figures it will be using to measure performance for the period 2029/30 to 2038/39. The figure of 20,311 homes would suggest an annualised requirement of 1,354dpa for the fifteen years the plan is intended to operate over. Alternatively, if one assumes that the 1,950dpa figure applies only from 2023/24 to 2028/29 that would give a figure of 9,750. Over ten years that would generate a figure of 19,500. This implies that for the last five years of the Plan a remaining requirement 811 homes or 162dpa.

We accept that there is no established or consistent approach to how local authorities implement the housing targets established by the London Plan for the period after 2029/30. Every local authority seems to have its own approach. Some local authorities roll the London Plan figures forward for the period beyond 2028/29. Others commence delivery of the London Plan targets from the date their new plan commences. It is unclear what approach Wandsworth is following, but an annual figure of 1,354dpa is likely to be insufficient in terms of addressing housing needs, especially if any deficits accrued in the years before the Plan based on the new London Plan targets are written-off.

For example, we note that the Council's most recent assessment of housing need, using the revised standard method – undertaken on 16 December 2020, indicates that the local housing needs figure is 3,425dpa. Paragraph 1.5 of the *Wandsworth Local Housing Needs Assessment*, December 2020 states that the stepped approach set out in PPG results in a figure of 2,537 or 45,666 between 2019 and 2037. As paragraph 1.28 concludes:

*The Council should consider its objectively assessed need for housing to be 2,537 dwellings per annum and seek to meet this as much as possible, subject to sufficient supply of deliverable sites being identified.*

These are high figures, driven no doubt by the acute affordability pressures specifically in Wandsworth and more generally across London (as a single housing market area), indicating that an average figure of 1,354dpa is probably inadequate in terms of addressing the housing needs of the people of the borough.

We note also in the *Wandsworth Local Housing Needs Assessment*, December 2020, the report observes that the affordable housing model generates a total net need of 3,575 dwellings per annum for the period 2019 and 2037 (paragraph 1.10).

It is necessary for Wandsworth to provide some more clarity of what its annual housing requirement is to assist with the monitoring of the Council's performance on housing delivery on an annual basis, especially for the period after the current London Plan annual housing targets cease to operate.

The Council would be prudent to roll-forward the London Plan target in view of the possibility of delays in the production of a fresh London Plan, and because of the shortfall in planned housing supply against assessed need across London in general. On the basis of the new London Plan, that shortfall is 14,000 homes a year. This is the difference between the assessed need for 66,000 homes a year and the capacity for 52,000 homes a year.

The London Plan is also under-delivering against its annual housing requirement to provide 52,000 net additions each year for the ten years between 2019/20 and 2028/29.

### DLUHC Live Table 122: Net additions to the dwelling stock

London		
Year	2019/20	2020/21
Net additions	40,870	37,183

As can be seen, against a requirement for 104,000 homes to have been provided in the first two years of the London Plan (52,000 x 2), London is already facing a deficit in the delivery of 25,947 homes.

To remedy this potential shortcoming with the Plan (if we have understood the Council's approach correctly) the Council could do two things.

1) roll-forward the annual target in the London Plan for the remainder of the plan-period – i.e. 1,950dpa for each year from 2029/30 to 2037/38. This would require 29,250 homes in total.

2) Conversely, an alternative approach would be to set a requirement up to 2032/33 for 1,950dpa – i.e. the first ten years of the Plan, but then make it clear that the Wandsworth Local Plan will default to a new requirement if a new London Plan is adopted before then or else default to the Government's Standard Method for the year 2032/33 to 2037/38.

### Housing capacity

Part B of the policy identifies capacity for 24,380 homes for the plan period. This indicates that the Council would not have the capacity to deliver 1,950dpa for 15-years which would require land for 29,250 homes, but it would have capacity to adhere to our second suggested approach, which is also the approach recommended by the London Plan.

The settlement hierarchy is unsound because it is unjustified.

Part A.1 goes onto state:

*The new homes will be allocated in accordance with the following sequential approach:*

*1. Within the following locations reflecting their strategic economic role and/or opportunities for regeneration as defined through the boundaries of the Area Strategies:*

- a. Wandsworth Town (including the Wandle Delta sub-area)*
- b. Putney*
- c. Tooting*
- d. Balham*
- e. Clapham Junction and the York Road/ Winstanley Estate Regeneration Area*
- f. The Roehampton and Alton Estate Regeneration Area*
- g. Nine Elms*
- h. Wandsworth's Riverside*
- i. The Wandle Valley*

*2. On allocated sites outside of the above areas.*

*3. Through the intensification of small sites within areas of higher accessibility.*

#### *4. Through lower levels of intensification on small sites elsewhere in the borough*

It is unclear what the Council is proposing here. This suggests that planning applications for residential development made in categories 2,3 and 4 – including on sites that have been allocated - will be refused until all development opportunities have been exhausted in category 1. This probably is not the Council's intention, but the reference to a 'sequential approach' means that the policy could be read in this way.

We recommend that the policy is redrafted to read:

*“The new homes will be allocated in the following categories:”*

Parts 2, 3 and 4 are unnecessarily restrictive. The borough is very well served by public transport. Nowhere is so distant from public transport that it could not support fresh housing. Every part of the borough should contribute to meeting housing needs. Housing delivery should be encouraged in all locations, including both windfall supply and on allocated sites. Parts 2, 3 and 4 should be replaced so that the Plan supports residential development on all sites in all locations in addition to the Area Strategies.

#### **Small sites requirement**

The Plan's approach to delivery on small sites is unsound because it is ineffective.

The London Plan introduces a requirement for 4,140 dwellings (or 414 per year) to be provided on small sites of 0.25ha in size or less for the period 2019/20 to 2028/29.

Part B identifies land for 24,380 homes. Within this table is a figure of 4,848 for small sites across the borough. However, this is a 15-year plan, and the London Plan at paragraph 4.1.11 recommends that the small sites assumption is rolled forward for plans that extend beyond the end date of the London Plan, even if the overall annual requirement is not. The small sites requirement of 414dpa for 15 years would require land for 6,210 homes. The Council should identify sufficient land to meet this requirement of the London Plan.

Second, national policy (NPPF, paragraph 69) and the London Plan (Policy H2, Part B3) expect local authorities to identify and allocate sites to achieve these targets. The purpose of these policy interventions by Government and the London Mayor is to assist SME housebuilders who struggle to find land. The tendency for local plans not to allocate small sites (1 ha or less nationally and 0.25ha in London) makes it difficult for SMEs to establish themselves and survive and this inhibits housing delivery overall.

On page 7 of the Housing and Economic Land Assessment, January 2022, the Council observes:

*To avoid double counting of known permissions and the windfall, the total capacity of sites of less than 0.25ha with planning permission projected to complete for each year within the Local Plan period has been deducted from the annualised targets, with the remaining assumed to be the windfall capacity.*

Table 2 in the same report the Council shows the composition of the small sites target:

Table 2: Housing supply (net dwellings) over the plan period

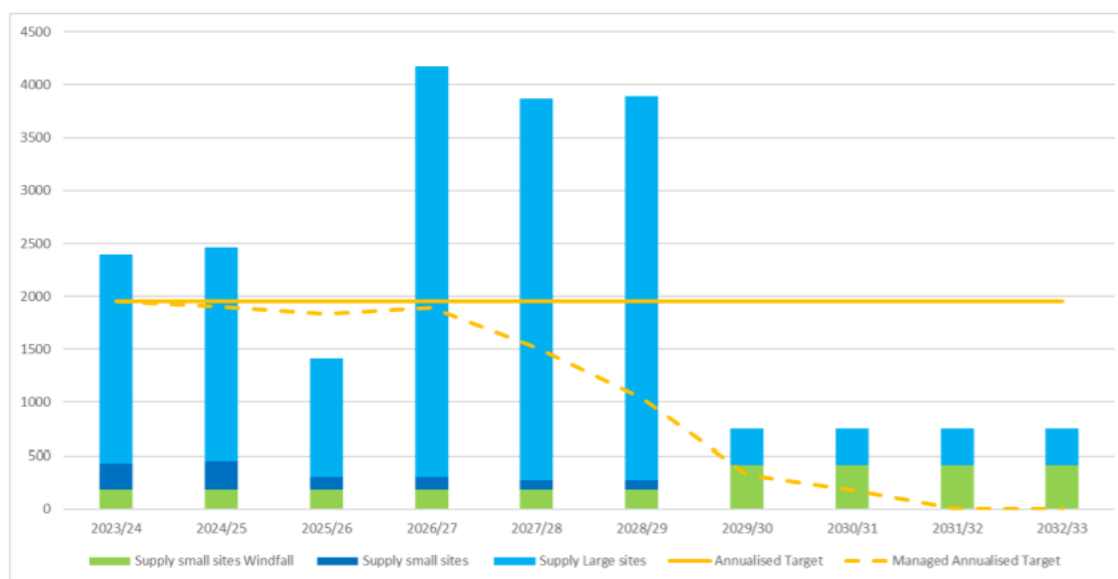
Site Size	Years 1–5 (2023/24–2027/28)	Years 1–10 (2023/24–2032/33)	Years 1–15 (2023/24–2037/38)
Large Sites	12,534	17,486	18,590
Small Sites	838	938	943
Small Sites Windfall	935	2,778	4,848
<b>Total</b>	<b>14,307</b>	<b>21,202</b>	<b>24,381</b>

As the table demonstrates, some of the small sites requirement will be provided on sites with planning permission (therefore allocated) – 2,719 in total. This is a welcome outcome and the Council should be commended for its efforts, but the Council should do more to actively identify and allocate other small sites to ensure the overall requirement of 4,140 homes is delivered (or the higher figure of 6,210 homes if our reasoning about planning for 15-years is accepted). The fact that many of these sites already have planning permission, however, does suggest that these sites were windfall sites that came forward by luck, rather than active allocation by the Council, although may be wrong.

### Local Plan housing trajectory

The *Housing and Economic Land Assessment, 2022*, provides a housing trajectory on page 10. This shows delivery peaking towards the middle of the plan but falling dramatically in years 2029/30 to 2032/33.

Figure 2: Housing trajectory



There are no figures provided for the last five-year segment – the years 2033/34 to 2037/38. This is reinforced by Table 2 reproduced above. Table 2 and Figure 2 suggest that the Council has no firm plans for housing delivery beyond 2032/33. Table 2 suggests that in the period 2033/34 to 2037/38 it appears that only 3,179 homes will be provided (24,381 less 21,202). This equates to 636dpa. The Council’s justification for this is explained in para. 2.105 of the Plan and on page 9 of the *Housing and Economic Land Assessment*. The Council explains, that in line with the advice in the London Plan, it has rolled-forward the small sites target of 414dpa.

Given the evidence of housing need in the borough the Council would be unjustified to plan for so few homes in this five-year period. While we acknowledge that land supply is uncertain

for this period, and much will depend on the next review of the London Plan, it would be unjustified to allow planned housing supply to fall away to such a low level relative to the evidence of need. The Council should amend the plan to adopt either one of the two measures recommended above – roll forward the 1,950dpa figure or default to the Standard Method.

### **LP23: Affordable Housing**

The affordable housing target is unsound in parts because it conflicts with national and London Plan policy.

#### Part A

The policy implies that all eligible schemes will need to provide 50% affordable housing. It is unclear if the Council intends to comply with London Plan policy H5 and operate the threshold approach to providing affordable housing. This is not referred to in the policy. The threshold approach requires applicants for schemes providing market housing to commit to providing at least 35% affordable homes in return for a faster determination of the application that dispenses with the details of viability is an approach that is generally welcomed by the industry. The requirement rises to 50% on public land. There are indications that the policy has helped to increase the supply of affordable homes in London since it was in operation in 2017.

We would welcome Wandsworth's support for the threshold policy approach in its local plan.

#### Part E

The Council says that it will disapply the Vacant Building Credit (VBC) in Wandsworth. This is unsound because it conflicts with national policy. The Mayor sought to suspend the VBC for London as a whole through the London Plan but the examining panel concluded that this would be inappropriate. We acknowledge the acute need for affordable housing but the Government introduced the VBC in order to incentivise the delivery of housing on brownfield land. Many other urban centres in England have not disapplied the VBC.

### **LP31: Specialist Housing for Vulnerable People**

The policy is unsound in part because it does not comply with the London Plan.

We note para. 2.4. This observes:

*“As a result of improvements to life expectancy, the number of elderly residents is increasing. The estimated percentage of older person (65+) residents in the borough was 9.5% (based on 2018 ONS population estimates); this is projected to increase to 12.5% by 2036 (GLA 2018-Based Housing-Led).”*

Although a relatively a young city, increasing life expectancy means that London's population is aging. The London Plan recognises this in paragraph 14.13.1 when it observes:

*“By 2029 the number of older person households (aged 65 and over) will have increased by 37 per cent, with households aged 75 and over (who are most likely to move into specialist older persons housing) increasing by 42 per cent. Appropriate accommodation is needed to meet the needs of older Londoners.”*

To cater for the needs of older people, London Plan policy H13 establishes benchmark targets for each borough for the supply of older persons accommodation. These benchmark figures are provided in Table 4.3. These are not binding targets, but indicative figures to guide the decision-making of the London boroughs to ensure that they are considering the needs for specialist older persons housing. The figure for Wandsworth is 120 units per annum.

Para. 4.13.4 clarifies that this policy does not cover care home accommodation.

To adhere to national and London Plan policy, the Plan should refer to the London Plan policy and the benchmark target for Wandsworth. It should include the benchmark target in its policy LP31. The policy should be clear that the benchmark target relates to the supply of older persons housing that does not provide an element of care but is specifically designed and managed for older people (minimum age of 55 years) is covered by the requirements of this policy. This is set out in paragraph 4.15.5 of the London Plan. The Council may wish to establish separate requirements for other types of specialist accommodation.

Part B, 1 of the policy should be deleted in so far as it relates to older persons housing covered by London Plan policy H13. Applicants to build older persons accommodation should not have to demonstrate a need. That need has been demonstrated by the London Plan. In the same way that the London Plan sets the housing requirements for the London boroughs, based on the GLA SHMA 2017, so it does for older persons housing.

### **LP55 Biodiversity**

Part B, 1 is unsound because it is ineffective.

Part B, 1 states:

*Development proposals will be required to protect and enhance biodiversity, through:*

*1. ensuring that it would not have an adverse effect on the borough's designated sites of habitat and species of importance (including buffer zones), as well as other existing species, wildlife, habitats and features of biodiversity value;*

The policy requires applicants to have regard to buffer zones but we are unaware if these buffer zones have been delineated in the Plan. It would, consequently, be unclear to applicants if a development proposal infringes upon a buffer zone. Paragraph 16 of the NPPF requires that Plans contain policies that are clear and unambiguous to allow decision makers to know how to respond to development proposals. It would be helpful if these buffer zones were shown on Map 21.3. However, this prompts a question about whether these buffer zones would become an obstacle to housing delivery, especially if these buffers are drawn generously. We note that paragraph 21.28 notes that many of the small sites are not identified on the Policies Map. This could cause major uncertainty for development proposals. This is an issue that requires attention.

Part B, 2 is unsound because it is ineffective.

Part B, 2 requires:

*The incorporation and creation of new habitats or biodiversity features on development sites including through the design of buildings and use of Sustainable Drainage Systems where appropriate. Developments will be required to deliver a net gain in biodiversity, through the incorporation of ecological enhancements*

The policy requires applicants to deliver a net gain in biodiversity but without specifying how much. Without specifying this it would be hard for applicants to know what to do. The Council should specify how much and justify this.



## Biodiversity Net Gain

We note paragraph 21.32. The Council says that provisions relating to biodiversity net gain, will be inserted into the Local Plan through a modification. This will happen once the Environment Bill receives royal assent. Among other things, as the Council acknowledges, the Bill is likely to require the creation of Local Nature Recovery Networks and Strategies. These will be important to enable developers to identify opportunities to provide improvements and enhancements to biodiversity if this cannot be secured onsite.

The identification of these areas will be very important to enable the implementation of the objectives of the Plan. Without these opportunities it is possible that the delivery of development needs targets, including targets for housing, will be unfeasible.

## Viability

The Plan is unsound in relation to its treatment of development viability because it is contrary to national policy.

Paragraph 22.14 states:

*The Council has undertaken a 'whole Plan' viability assessment. However, it is recognised that the housing and commercial property markets are inherently cyclical such that a fully policy compliant scheme may make some development proposals unviable at the time of submitting a planning application. The Plan sets out the approach that the Council will take to assessing such proposals and the mechanisms that it will adopt to ensure that schemes contribute fully should viability improve.*

This is not the approach established in national policy. The NPPF begins from an assumption that all policies in an up-to-date local plan are achievable and hence viable, and therefore the scope for applicants to contest the viability of policies is much reduced. The obligation, therefore, at the plan-making stage is on the plan-maker to ensure that the policies in the local plan are viable and will not jeopardise delivery of the plan objectives.

Wandsworth's Local Plan at policy LP23: Affordable Housing requires 50% affordable housing from all eligible developments. As we have discussed above, the Plan is unclear about the role of the Mayor's threshold approach to affordable housing, so it appears that 50% is basic requirement. If that is the case, then the *Local Plan Viability Assessment, January 2022* shows that this will cause delivery issues across a number of scenarios.

The *Local Plan Viability Assessment, January 2022* observes at paragraphs 7.20 and 7.21 that the 50% affordable housing target could cause difficulties against some typologies:

*Therefore Scenario 2 considers the impact of 50% affordable housing across all residential developments with 10 or more dwellings.*

*The results in Table 7.5 show that this requirement would result in most of the tested value area 1 typologies and about half the tested value area 2 typologies may be challenged in delivery viable development. But likewise, around half the tested value 2 area typologies and all the tested value 3 area typologies would still be able to deliver 50% affordable units along with other Reg 19 Local Plan policies, and it is in these two areas where the bulk of site allocations are located.*

Table 7.5 on pages 88-89 of the report is reproduced below.

**Table 7.5 Viability of residential site typologies under alternative Scenario 2**

ID	Typology (no. of dwelling and non-residential floorspace (sqm))	Value area	Site area (ha)	Average no. of floors	Scenario 2 (50% Affordable Homes, with 50%SR, 25%FH w.30%discount, 12.5%SO, 12.5%LLR)
1	2 houses	Zone 1 (W,S,SE)	0.05	2	
2	9 houses	Zone 1 (W,S,SE)	0.23	2	
3	9 flats	Zone 1 (W,S,SE)	0.05	3	
4	30 flats	Zone 1 (W,S,SE)	0.15	5	
5	75 flats	Zone 1 (W,S,SE)	0.18	5	
6	250 flats	Zone 1 (W,S,SE)	1.76	5	
7	600 flats	Zone 1 (W,S,SE)	2.49	6	
8	200 flats + 3,000 retail + 1,000 B1a	Zone 1 (W,S,SE)	1.98	6	
9	400 flats + 1,500 retail	Zone 1 (W,S,SE)	1.95	6	
10	80 flats, 200 retail + 5,000 B1a + 5,000 Ind/whg	Zone 1 (W,S,SE)	1.03	6	
11	2 houses	Zone 2 (Mid,N,E)	0.05	2	
12	9 houses	Zone 2 (Mid,N,E)	0.23	2	
13	9 flats + 4,000 Ind/whg	Zone 2 (Mid,N,E)	0.29	3	
14	30 flats + 400 retail	Zone 2 (Mid,N,E)	0.24	4	
15	75 flats + 2,000 Ind/whg	Zone 2 (Mid,N,E)	0.29	8	
16	150 flats + 2,000 Ba	Zone 2 (Mid,N,E)	0.72	8	
17	300 flats + 5,000 B1a	Zone 2 (Mid,N,E)	0.76	10	
18	50 flats + 1,300 B1a	Zone 2 (Mid,N,E)	0.29	6	
19	150 flats + 5,000 B1a	Zone 2 (Mid,N,E)	0.48	10	
20	480 flats + 7,000 B1a	Zone 2 (Mid,N,E)	2.67	9	
21	100 flats + 2,000 retail	Zone 2 (Mid,N,E)	0.51	6	
22	450 flats + 3,000 B1b/B2/B8	Zone 2 (Mid,N,E)	1.02	10	
23	40 flats + 3,000 retail + 700 B1a	Zone 2 (Mid,N,E)	0.6	4	
24	250 flats + 650 retail + 1,600 B1a	Zone 2 (Mid,N,E)	2.3	8	
25	250 flats + 400 retail + 2,000 B1b/B2/B8	Zone 2 (Mid,N,E)	1.79	8	
26	140 flats + 3,000 retail + 4,000 B1a	Zone 2 (Mid,N,E)	0.6	8	
27	600 flats + 10,000 retail + 1,000 B1b/B2/B8	Zone 2 (Mid,N,E)	3.51	8	
28	500 flats + 800 retail + 3,500 B1b/B2/B8	Zone 2 (Mid,N,E)	2.81	6	
29	12 flats + 500 B1a + 2,500 B1b/B2/B8	Zone 2 (Mid,N,E)	0.39	3	

ID	Typology (no. of dwelling and non-residential floorspace (sqm))	Value area	Site area (ha)	Average no. of floors	Scenario 2 (50% Affordable Homes, with 50%SR, 25%FH w.30%discount, 12.5%SO, 12.5%LLR)
30	350 flats + 7,500 B1a + 15,000 B1b/B2/B8	Zone 2 (Mid,N,E)	2.19	6	
31	180 flats + 700 retail + 500 B1a + 1,800 B1b/B2/B8	Zone 2 (Mid,N,E)	1.25	4	
32	500 flats + 2,500 retail + 5,500 B1a	Zone 2 (Mid,N,E)	1.42	10	
33	1,750 flats + 15,000 retail + 3,500 B1a	Zone 2 (Mid,N,E)	10.63	15	
34	350 retail + 40,000 Offices + 15,000 Ind/whsing	Zone 3 (VNEB)	2.64	15	
35	33,000 B1a + 28,000 B1b/B2/B8	Zone 3 (VNEB)	3.95	8	
36	9 flats	Zone 3 (VNEB)	0.03	10	
36	30 flats + 500 B1a	Zone 3 (VNEB)	0.08	10	
37	50 flats	Zone 3 (VNEB)	0.37	4	
38	400 flats	Zone 3 (VNEB)	1.06	10	
39	400 flats + 3,000 retail	Zone 3 (VNEB)	1.13	10	
40	100 flats + 3,000 B1a	Zone 3 (VNEB)	0.5	8	
41	350 flats + 400 retail + 1,300 B1a	Zone 3 (VNEB)	0.93	10	

As can be seen, several typologies are unviable. The value areas where these developments types are located may not be the areas where the majority of residential development is going

to be concentrated, but given the tight land supply constraints especially the uncertainty of land supply for housing for the period beyond 2033 (the Council relies on a windfall assumption for this period) the Council needs to ensure that all areas of the borough are able to make a contribution to the supply of homes especially in the first ten years of the life of the Plan.

The Council should ensure that the Mayor's threshold approach is supported and adopted by the Wandsworth Plan.

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HBF is very happy to discuss these representations with the Council if this would assist with the progression of the new Local Plan.

**James Stevens**  
**Director for Cities**

