



LONDON BOROUGH OF WANDSWORTH

LOCAL PLAN INDEPENDENT EXAMINATION IN PUBLIC

WRITTEN STATEMENT

MAIN MATTER 16:

PROVIDING HOUSING

(POLICIES LP23 - LP32)

WEDNESDAY 23 NOVEMBER 2022

Abbreviations

AHO – Affordable Home Ownership

BtR – Build to Rent

HMO – Houses in Multiple Occupation

LBW – London Borough of Wandsworth

LHNA – Local Housing Needs Assessment

LP – The London Plan

NPPF – National Planning Policy Framework

SPG – Supplementary Planning Guidance

WLP – Wandsworth Local Plan

Are the requirements of the Housing policies justified by appropriate available evidence, having regard to national guidance, local context, and the London Plan?

The requirements of the policies in Chapter 17 ‘Providing Housing’ are justified by appropriate available evidence and have had regard to national guidance, local context and the London Plan.

The primary sources of evidence are as follows:

- [Wandsworth Local Housing Needs Assessment December 2020](#) (SD-043)
- [First Homes December 2021](#) (SD-044)
- [Affordability and financial viability impact of First Homes July 2021](#) (SD-045)
- [A Housing Offer for Wandsworth People: Housing and Homelessness Strategy 2019-2022](#) (SD-046)
- [Gypsies and Travellers Accommodation Needs Assessment April 2022](#) (SD-049)
- [Residential Conversion Policy and Meeting the Small Sites Housing Target Topic Paper April 2022](#) (SD-050)
- [Standards for External Amenity Space in Residential Conversions Topic Paper April 2022](#) (SD-051)

Chapter 17 ‘Providing Housing’ sets out the policies for the detailed delivery and management of new housing provision within the borough and supports the implementation of Policy SDS1 (see the Council’s Statement in relation to Main Matter 2). The policies are in accordance with the National Planning Policy Framework (NPF) and in general conformity with the London Plan.

Policy SDS1 sets the overall housing requirement and the capacity figures for the Area Strategies identified in the Local Plan Publication Version (the Plan) and for locations outside of the Area Strategy Areas. This specifically covers different types, forms and tenures of development for different groups of people and sets out the Council’s expectations for securing this housing through the implementation of development proposals.

The evidence which supports the housing policies of the Plan (LP23 – LP32 inclusive) is set out above. In particular, the Local Housing Needs Assessment¹ (LHNA, SD-043) uses Wandsworth specific demographic information and trends to determine the overall needs for both mainstream and affordable housing, together with the housing mix to be sought and the

¹ The NPPF advocates a Local Housing Needs Assessment at para.61; ‘strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance’.

levels of need for a range of specific needs including student housing and supported housing. The LHNA also considers emerging forms of housing such as co-living and build-to-rent (BtR), and considers the role of the private rented sector and Houses in Multiple Occupation (HMO). It is therefore a sound basis for the housing policies.

Meeting the need for affordable housing provides a key objective for the Council over the plan period, and there is a strong indication that smaller homes are required both by those on the housing waiting lists and by younger renters and buyers in relation to mainstream market housing. Relevant policies in Chapter 17 also look to balance the need for bigger houses and protect the existing stock of larger houses and family homes to ensure that communities can remain mixed and inclusive. Where appropriate, policies also seek to ensure that over-concentration of any kind of home in a particular neighbourhood does not undermine this same principle.

Chapter 5 of the NPPF deals with delivering a sufficient supply of homes. It looks to the planning system to support the objective to significantly boost the supply of homes. It is important, states para. 60, that *'a sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed'*. Paragraph 62 asks that, *'the size, type and tenure of housing needed for different groups in the community should be assessed and reflected in planning policies.'* This includes the need for affordable housing. The Housing chapter of the Plan sets out how the requirements of the NPPF will be delivered.

The London Plan provides a framework for ensuring that both affordable housing and other housing products are delivered, in accordance with national policy and guidance, and to inform the development of the borough's own locally focused policies.

Affordable housing policies are set out at Policies H4 to H7 of the London Plan. Policy H4 sets out a strategic target for the capital of 50% that all new homes delivered across London should be genuinely affordable. Policy H5 specifies a threshold approach for major development which enables schemes which provide for a minimum of 35% affordable housing in return for a fast-track approach to viability.

Policy H6 defines the tenure split applicable to affordable housing (with a preference towards a higher proportion of low-cost rented products), and Policy H7 sets out the approach to monitoring affordable housing delivery. The London Plan policies were adopted prior to the introduction by Government of the First Homes policy. The Mayor's office subsequently issued a [practice note](#) regarding First Homes. The Mayor has also produced Supplementary

Planning Guidance covering [Affordable Housing and Viability](#) which deals with the threshold approach and viability assessment along with specific requirements for Build to Rent schemes. Policy H6 identifies the affordable housing tenure split that should be sought, being 30% low cost rented, 30% intermediate product and the remaining 40% to be determined by each borough based on its locally evidenced identified need.

The key policies in the London Plan for dealing with specific needs, or specific forms of housing are dealt with in policies H11 – H16, as follows:

- H11 – Build to Rent
- H12 – Supported and specialised accommodation
- H13 – Specialist older persons housing
- H14 – Gypsy and Traveller accommodation
- H15 – Purpose-built student accommodation
- H16 – Large-scale purpose-built shared living

The policies within the London Plan are comprehensive and contain clear criteria against which development proposals will be determined. This seeks to ensure that a clear and consistent approach is taken across London, subject to the addition of local evidence where a policy provides flexibility.

Policy H11, 'Build to Rent', relates to this distinct form of housing product and provides both a definition of the type of development that would be considered as such, and a means of securing the affordable element with such schemes. Para 4.11.10 provides flexibility for boroughs (through their own development plan) to seek a proportion of affordable housing as low cost rent as opposed to the discounted market rent.

Policy H12 supports the provision of supported and specialised housing that meets the needs of its intended occupiers and where the need for its provision is evidenced. Policy H13 deals with specialist older persons housing (i.e. housing that does not provide an element of care but is specifically designed and managed for older people (minimum age of 55 years)). This policy provides a benchmark figure for Wandsworth of 120 units per annum.

Policy H14 provides for meeting Gypsy and Traveller accommodation needs and provides a target for the provision of pitches within each borough, noting that this is based on a 2008 pan-London study which is in the process of being updated; it is understood that the results of this will be published in early 2023.

Policy H15 addresses the need for purpose-built student accommodation and sets out specific criteria for ensuring that such accommodation contributes to mixed and inclusive neighbourhoods and is secured for students. Such accommodation should be in locations that are accessible and close to local services. There are no targets defined for student accommodation, but the number of students in London is a quantifiable amount.

Policy H16 relates to large-scale purpose-built shared living. This form of housing is similar in nature to student accommodation but provides short term rental accommodation in a block with shared facilities (such as workspace, kitchens, laundry and events spaces). This is an emerging part of the housing market aimed primarily for young, working people who are unable to buy and prefer not to rent more traditional rental properties. Policy H16 provides a definition and a means to securing an affordable housing contribution from such schemes. The Mayor is proposing to publish further guidance in due course.

Policies D6 and D7 set out comprehensive standards for new homes including in terms of internal room size, aspect, storage and accessibility amongst other things. Policies D5 (Inclusive Design) and D12 (Fire Safety) are also policies of relevance.

Wandsworth Local Plan

Policy LP24 'Housing Mix' is in general conformity with Policy H10 of the London Plan and reflects the findings of the LHNA. Based on demographic trends, the policy sets out that the mix of new market housing should be directed primarily towards 1- and 2-bedroom properties. The mix of new affordable housing should also be focused on smaller properties, reflecting the preferences of households on the Wandsworth's Housing Register.

The LHNA also recognises that there will still be a need for larger homes. The policy therefore sets out that 15-25% of new housing should be 3-bed and 5-10% of new homes should be 4+ bed. The LHNA also identifies that there are minor demographic differences between wards. Consequently, the policy is not intended to be entirely prescriptive in that Part E allows for a site by site consideration to be applied where evidence suggest that a different approach is justified.

Policy LP25 'Protecting the Existing Housing Stock' seeks to limit the loss of the existing housing stock. Policy LP26 'Conversions' reflects the continued importance of family housing within the borough by seeking to limiting the conversion of family dwellings into flats. The policy sets out the circumstances when conversions into flats will be acceptable. The background and reasoning for this approach is set out in Residential Conversion Policy Topic Paper (SD-050).

Policy LP27 'Housing Standards' is in general conformity with Policies D5, D6, D7 and D12 of the London Plan. The Council has suggested Main Modifications to this Policy (see WBC-010 References PPMM/094, PPMM/095) in relation to the inclusion of a local standard for external amenity space. This is in general conformity with London Plan Policy D6 Part 9. These suggested Main Modifications are also consistent with the standards sought for external amenity space in Policies LP7 and LP26 (see Standards for External Amenity Space in Residential Conversions Topic Paper, SD-051).

LP28 'Purpose Built Student Accommodation', is in general conformity with London Plan Policy H15. There are two higher educational establishments in Wandsworth. The LHNA identifies the relationship between the provision of purpose-built student accommodation and the impact on elements of the general housing market, particularly in the private rented sector. Therefore, there is a need to support such provision where there is a clearly identified need. Policy LP28 also provides flexibility where it can be clearly demonstrated that demand for the provision of such accommodation no longer exists and also recognises that student accommodation may be proposed in Wandsworth to provide for students at establishments outside of the Wandsworth administrative area.

Policy LP29 'Housing with Shared Facilities' relates to Houses in Multiple Occupation (HMO) within Parts A and B, and large-scale purpose-built shared living within Parts C and D. The policy is in general conformity London Plan Policy H9, which supports the presence of HMOs and recognises their contribution to the wider housing market. The Local Plan policy also emphasise the wider aim of protecting and maintaining family housing.

Parts C and D are in general conformity with London Plan Policy H16 in Part D. Part C of Policy LP29 generally resists large-scale purpose-built shared living accommodation in order to avoid, for example, an overconcentration of single-person accommodation at the neighbourhood level but states the circumstances under which proposals may be considered acceptable. The nature of 'co-living' schemes is such that they can often result in high volumes of similar short term rented rooms which are likely to have a limited appeal for those seeking accommodation. In addition, affordable housing cannot be secured on-site. The policy reflects the Council's priority of securing the delivery of conventional housing that meets the identified needs of Wandsworth's population.

Policy LP30 'Build to Rent' is in general conformity with London Plan Policy H11. The Council's preference is to secure low-cost rented housing through schemes involving Build to Rent (para. 17.51). The criteria set out in Policy LP30 include the Council's approach to securing low-cost rented housing, which would then be managed through a Registered

Provider. Build to Rent schemes are expected to provide a mix of housing in accord with LP24, with the objective of avoiding an over-concentration of a single type and size of accommodation.

Policy LP31 ‘Specialist Housing for Vulnerable People’ is in general conformity with London Plan Policies H12 and H13. The policy seeks to ensure that there is a sufficient supply of appropriate housing available for older people, homeless people, disabled people and vulnerable people. The need for such accommodation is identified in the LHNA. The supporting text refers to the benchmark target provided by the London Plan (see para 17.57).

Are the policies relating to Affordable Housing justified by appropriate available evidence, having regard to national guidance, and local context, and SDS1?

Affordable housing need is assessed through the LHNA (SD-043)². The affordable housing model used to inform the LHNA identifies a total net need for the borough of 3,575 dwellings per annum. This comprises 2,327 affordable rented dwellings per annum and 1,248 Affordable Home Ownership (AHO) units per annum between 2019 and 2037. The overall need for affordable homes exceeds the borough’s housing requirement as set out in Policy SDS1. As such the borough’s evidenced Affordable Housing need cannot in practice be met. Such circumstances are recognised in national policy, which requires the Council to set affordable housing targets that are realistic. The Council has therefore focused its approach to delivery of affordable housing through LP23 on those who are in priority need.

The LHNA recommends, at para 1.30, that *‘the affordable housing policy should seek to strike a balance between low-cost rented and intermediate tenures. Whilst there is a significant need for low-cost rented housing, the tenure mix should also meet the needs of those working households on low to middle incomes who would neither have priority for social housing nor be able to afford most forms of market housing’*.

It goes on to state at para 1.31 that, *‘The approach to affordable housing should take into account forecast demographic trends to offer a route to suitable accommodation to a range of households in order to maintain mixed and balanced communities. The analysis indicates that LBW should allocate up to 50 per cent (20 percentage points) of the discretionary*

² The role of the LHNA and its compliance with national guidance is set out in response to the question, ‘Does WLP adequately address the needs for all types of housing and the needs of different groups in the community?’ at Matter 2.

affordable housing target to intermediate tenures as long as future policies prioritise London Living Rent over Affordable Rent dwellings at 80% market discount’.

Policy LP23 ‘Affordable Housing’ meets the requirements of national policy and guidance, and is in general conformity with the London Plan. LP23 Part B states that major development must provide affordable housing in accord with the threshold approach set out at London Plan Policy H5. Part C sets out a tenure split of 50% low-cost rent, 25% First Homes and 25% other intermediate products.

The Council has considered the Mayor’s Regulation 19 response in relation to his expressed ‘concern’ with the inclusion of a proportion of First Homes in Policy LP23. The approach was considered to be justified at the time of the publication of the Plan on the basis of early evidence collected and published (see Local Housing Needs Assessment – First Homes (SD-044) and Affordability and Financial Viability Impact of First Homes (SD-045)). However, to date, no First Homes have been secured in the borough and uncertainty exists as to the deliverability and viability of First Homes within the borough. On the basis of these matters, the Council has suggested proposed Main Modifications to Policy LP23 and its supporting text in this regard (see WBC-010 References PPMM/091, PPMM/092 and PPMM/093, page 23) Further commentary is provided in the Council’s response to MM1 – Legal Requirements and Overarching Issues.

Parts D, E and F to Policy LP23 relate to the locational provision of the affordable housing, the need for viability information and the management of the housing provided. Part G sets out the Council’s position that Vacant Building Credit is not justified in Wandsworth. This is consistent with the Mayor’s approach as set out in the Affordable Housing and Viability Supplementary Planning Guidance but provides some flexibility by identifying the limited exceptional circumstances where Vacant Building Credit may be justified.

Is the Gypsies and Travellers Accommodation Needs Assessment April 2022 up to date and robust in its identification of needs for plots and pitches?

The Gypsies and Travellers Accommodation Needs Assessment is up-to-date and is in general conformity with the London Plan and national policy and guidance. Annual counts are undertaken to satisfy Government requirements, and the Council’s Housing team make regular visits to the existing site within the borough at Trewint Street.

Further background and compliance with national and London Plan policy is provided in the Council’s response to Main Matter 2.

Does the Council’s approach in relation to traveller sites generally conform with the expectations of Planning Policy for Traveller Sites (August 2015)?

The Council’s approach in relation to Traveller sites conforms with the expectation of the Government’s Planning Policy for Traveller Sites. Regard has been had to Paragraph 4 of the Policy, including that the Council:

- Has undertaken its own assessment of need;
- Works with neighbouring authorities on a regular basis;
- Has assessed need on the basis of a reasonable timescale, and will be responsive to the outcomes of the current Pan-London assessment;
- Allows for the provision of additional sites in the borough through a fair and unambiguous criteria-based policy;
- Provides protection for the current provision;
- Includes through Policy LP32 the requirements of paragraph 13 of the Policy (see below).

Further background and compliance with Planning Policy for Traveller Sites is provided in the Council’s response to Main Matter 2.

Does policy LP32 provide an adequate criterion-based policy for the assessment of Gypsy and Traveller site proposals?

Paragraph 11 of Planning Policy for Traveller Sites sets out that plans have criteria-based policies to provide a basis for decisions should applications come forward for sites. Policies, according to this paragraph, should be *‘fair and ... facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community.’*

Policy LP32 draws on previous experience by providing the policy framework to enable the Council to respond to applications that may be forthcoming. In accordance with Paragraph 13 of Planning Policy for Travellers Sites, the policy specifically includes the need for there to be access to schools, and health and welfare facilities. Other considerations required include the need for adequate access and accessibility, compatibility with context and surroundings and the need to avoid areas at risk from flooding. The policy includes clear and unambiguous language that assists with decision-making.

Do Policies LP23 – LP32 provide clear direction as to how a decision maker should react to a development proposal?

The Council consider that Policies LP23 to LP32 are in accordance with Paragraph 16 of the NPPF, which requires that they are, '*clearly written and unambiguous*', and drafted in such a manner that it is '*evident how a decision maker should react to development proposals*.' Policies are positively worded unless local evidence suggests an alternative approach, and – where appropriate – set out the requirements for decision makers using a criteria-based approach. The thresholds to which a policy applies are clearly set out. The justification for each policy and how it will be applied is clearly set out within the relevant supporting text.

The policies are clearly linked to the relevant environmental, social and economic objectives of the Local Plan, as set out in Chapter 2. These objectives support the achievement of the Local Plan's vision and form the basis of its spatial strategy. The Council assessed the clarity and intent of the policies using the Planning Advisory Services Soundness Self-Assessment Checklist (SD-015), and in particular Q44 which asks, 'Are the objectives the policies are trying to achieve clear, and can the policies be easily used and understood for decision making?'

Following the public consultation on the Pre-Publication (Regulation 18) Local Plan, changes were made to Policies LP23 to LP32³, including to expressly address matters of clarity. The Council's detailed responses and the outcome of the representations submitted with respect to the Local Plan are set out in the Council's Statement of Consultation Regulation 18, Appendix 5: Responses to Local Plan Pre-Publication Consultation and Officer Comments (SD-004), with those specific to policies LP23 to LP32 from pages 363 to 413.

The Publication (Regulation 19) Local Plan (SD-001) has been submitted to the Secretary of State for Examination. However, the Council has reviewed the representations received and have set out detailed comments within the Schedule of Representations on the Publication (Regulation 19) Local Plan and the Council's Responses (WBC-007 and WBC-008). The responses identify, where considered appropriate, a small number of specific changes to the wording of policies and the supporting text for the sake of clarity. These are set out within the Schedules of Proposed Main and Additional Modifications Suggested by the Council (WBC-010 References PPMM/091 - PPMM/095 and WBC-011 PPAM/077 – PPAM/078), respectively.

³ Numbered LP25 – LP35 at Regulation 18.